Federal Subsistence Board Public Meeting

Meeting Materials: Volume II A

(Non-Consensus Agenda Proposals and Closure Reviews)

April 12-15, 2022

Via Teleconference

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VOLUME II

Non-Consensus Agenda

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FEDERAL SUBSISTENCE BOARD

PUBLIC MEETING AGENDA
April 12 - 15, 2022

April 12, 2022: 1:30 p.m. to 5:00 p.m. (or until recessed)
April 13 - 15, 2022: 9:00 a.m. to 5:00 p.m. (or until recessed) daily

The meeting will convene by **teleconference only**
To participate, dial toll free **(888) 455-7761**, (passcode **2266069**)

On April 12th, prior to 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 closure reviews and proposals to change Federal Subsistence Regulations. The Public Meeting will begin at 1:30 p.m. Updates on the Board's progress through the agenda will be posted online at https://www.doi.gov/subsistence/board/ and www.facebook.com/subsistencealaska.

Public Meeting

***Asterisk denotes Action Item**

1. **Call to Order and Welcome**
2. **Review and Adopt Agenda***
3. **Federal Subsistence Board Information Sharing**
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. **Old Business**
7. **2022–2024 Subparts C&D Proposals and Closure Reviews** *(Wildlife Regulations)*
   a. Announcement of Consensus Agenda
   (see detailed agenda that follows)
   b. Public Comment Period on Consensus Agenda Items *(This opportunity is available at the beginning of each subsequent day prior to the final action)*
   c. Board deliberation and action on Non-Consensus Agenda items*
   (See detailed agenda that follows)
   d. Adoption of Consensus Agenda*
8. **WSA22-01, Units 22 and 23 muskox*** *(Supplemental)*
9. **FP21-10 Lower Copper River Area Salmon*** *(Supplemental)*
10. **Schedule of Upcoming Board meetings***
    a. 2022 Summer Work Session (*Date and topics to be determined*)
    b. 2023 Winter Public Meeting (*Fish and Shellfish Regulations – Date to be determined*)
11. **Federal Subsistence Management Program correspondence procedures**
12. **Other Business**
13. **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.

Proposal	Region/Unit/Species	Recommendation	Analysis Page
WP22-05	Southeast/Unit 3/Elk	Oppose	Vol. II 572
WP22-09	Southeast/Unit 4/Deer	Oppose	Vol. II 792
WP22-11	Southeast/Unit 5/Goat	Support with OSM modification	1
WCR22-02	Southeast/Unit 5/Moose	Maintain status quo	20
WP22-13	Statewide/Unit 6/Deer	Oppose	40
WP22-14	Southcentral, Southeast/Unit 6/ Black Bear	Oppose	51
WP22-15	Southcentral/Unit 7/All Furbearers	Oppose	63
WP22-16 / 17 / 18 / 19 / 21 / 22 / 23 / 24 / 26a	Southcentral/Units 7, 15/Caribou, Goat, Moose, Sheep	Support WP22-16/17/18/21/23/26a; Support WP22/24 as modified by the SCRAC; Oppose WP22-19	127
WP22-20 / 25a / 27	Southcentral/Units 7, 15/Moose, Sheep	Oppose WP22-20; Support WP22-25a; Support WP22-27 as modified by the SCRAC	158
WP22-32	Southcentral/Unit 15/Black Bear, Brown Bear, Caribou, Goat, Moose, Sheep	Oppose	184
WP22-33	Statewide/Units 11, 12/Black Bear	Support	209
WP22-34	Southcentral, Eastern Interior/ Units 11, 12/Sheep	Oppose	218
WP22-37	Statewide/Unit 9/Ptarmigan	Support with OSM modification	226
WP22-38a	Kodiak-Aleutians, Bristol Bay/ Unit 10/Caribou	Support	240

Proposal	Region/Unit/Species	Recommendation	Analysis Page
WP22-38b	Kodiak-Aleutians, Bristol Bay/ Unit 10/Caribou	Support as modified by the KARAC	253
WP22-40	Statewide/Units 9, 17/Wolf, Wolverine	Support as modified by the BBRAC	280
WP22-41	Bristol Bay, YK Delta, Western Interior, Seward Peninsula/Units 9, 17, 18, 19/Caribou	Support	300
WCR22-07	Bristol Bay, Western Interior/ Unit 17/Caribou	Maintain status quo	331
WP22-42	YK Delta, Western Interior, Seward Peninsula/Unit 18/ Moose	Support	346
WP22-43	YK Delta, Western Interior/Unit 18/Moose	Oppose	Vol. II 1063
WP22-46	Western Interior/Unit 24/Brown Bear	Support	361
WP22-48	Seward Peninsula/Unit 22/ Moose	Support	375
WCR22-09c	Seward Peninsula/Unit 22/ Moose	Maintain status quo	387
WCR22-16	Seward Peninsula/Unit 22/ Moose	Maintain status quo	408
WP22-50	Statewide/Unit 23/Beaver	Support with OSM modification	420
WCR22-27	Northwest Arctic, North Slope/ Unit 23/Muskox	Modify or eliminate closure as recommended by OSM	428
WP22-51	Eastern Interior/Unit 20/Moose	Support	438
WP22-52	Eastern Interior/Unit 25/Moose	Support as modified by the EIRAC	444
WP22-53	Statewide/Unit 25/Arctic Fox	Support	454
WCR22-22	Eastern Interior/Unit 25/Moose	Maintain status quo	460
WP22-55	North Slope/Unit 26/Muskox	Support with OSM modification	Supplemental
WP22-56	North Slope/Unit 26/Brown Bear	Support	477
WCR22-25	North Slope/Unit 26/Muskox	Maintain status quo	490

FEDERAL SUBSISTENCE BOARD
NON-CONSENSUS AGENDA

Procedure for considering proposals:

Analysis *(Lead Author)*

Summary of public comments *(OSM Staff)*

Open floor to public testimony

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

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

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

Interagency Staff Committee comments *(ISC Chair)*

Board discussion with Council Chairs and State Liaison

Federal Subsistence Board action

Proposal	Region/Unit/Species	Analysis Page
WP22-01	Statewide/All Units/Various	500
WP22-02	Statewide/Units 6, 9, 10, 22, 23, 26/Various	519
WP22-03	Statewide/Unit 2/Wolf	542
WP22-04	Southeast/Units 1-4/Elk	572
WP22-06	Southeast/Unit 3/Moose	Supplemental
WP22-07	Southeast/Unit 4/Deer	594
WP22-08	Southeast/Unit 4/Deer	701
WP22-10	Southeast/Unit 4/Deer	792
WCR22-01	Southeast/Unit 2/Deer	912
WP22-12	Statewide/Unit 6/Deer	941
WP22-25b / 26b	Statewide/Unit 7/Sheep	958
WP22-28 / 29	Southcentral/Unit 7/Moose	983
WP22-30 / 31	Southcentral/Unit 15/Moose	994
WP22-35	Southcentral, Eastern Interior/Unit 11/Caribou	1012
WP22-36	Southcentral, Eastern Interior/Units 11, 12, 13/Caribou, Moose	Supplemental
WP22-39	Statewide/Units 9, 17/Hare	1035
WCR22-05	Bristol Bay/Unit 9/Moose	1048
WP22-44	YK Delta, Western Interior/Unit 18/Moose	1063
WP22-45	Statewide/Units 18, 22, 23/Hare	1094

Proposal	Region/Unit/Species	Analysis Page
WP22-47	Seward Peninsula, YK Delta, Northwest Arctic, Western Interior, North Slope/Unit 22/Caribou	1109
WP22-49	Seward Peninsula/Unit 22/Moose	1138
WCR22-09b	Seward Peninsula/Unit 22/Moose	1158
WCR22-11 / 12	Seward Peninsula/Unit 22/Moose	113
WCR22-13	Seward Peninsula/Unit 22/Moose	1185
WCR22-14	Seward Peninsula/Unit 22/Moose	1197
WCR22-18	Northwest Arctic, North Slope/Unit 23/Sheep	1212
WCR22-45	Northwest Arctic, Seward Peninsula, Western Interior, North Slope/Unit 23/Caribou	1226
WP22-54	North Slope/Unit 26/Moose	1253

WP22–01 Executive Summary	
General Description	Proposal WP22-01 requests clarification of who is and who is not a participant in a community harvest system and how that affects community and individual harvest limits. Submitted by: the Office of Subsistence Management
Proposed Regulation	***§_____.25 Subsistence taking of fish, wildlife, and shellfish: general regulations*** *(c) Harvest limits* . . . ***(5) Fish, wildlife, or shellfish taken by a participant in a community harvest system counts toward the community harvest limit or quota for that species as well as individual harvest limits, Federal or State, for each participant in that community harvest system, however, the take does not count toward individual harvest limits, Federal or State, of any non-participant. Fish, wildlife, or shellfish taken by someone who is not a participant in a community harvest system does not count toward any community harvest limit or quota.*** ***(i) For the purposes of this provision, all residents of the community are deemed participants in the community harvest unless the Board-approved framework requires registration as a prerequisite to harvesting or receiving any fish, wildlife, or shellfish pursuant to that community harvest, in which case only those w*ho register are deemed participants in that community harvest.** ***§_____.26 Subsistence taking of wildlife*** *(e) Possession and transportation of wildlife.* . . . ~~*(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts toward the community harvest limit for that species. Except for wildlife taken pursuant to §____.10(d)(5)(iii) or as otherwise provided for by this part, an animal taken as part of a community harvest limit counts toward every community member's harvest limit for that species taken under Federal or State of Alaska regulations.*~~
OSM Conclusion	**Support**

WP22–01 Executive Summary	
Southeast Alaska Subsistence Regional Advisory Council Recommendation	**Take no action**
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	**Support**
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	**Support**
Bristol Bay Subsistence Regional Advisory Council Recommendation	**Support**
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	**Support**
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	**Support**
Seward Peninsula Subsistence Regional Advisory Council Recommendation	**Defer** WP22-01 to regions with community harvest systems
Northwest Arctic Subsistence Regional Advisory Council Recommendation	**Support**
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	**Support**
North Slope Subsistence Regional Advisory Council Recommendation	**Support**
Interagency Staff Committee Comments	The Interagency Staff Committee found the staff analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and Federal Subsistence Board action on the proposal.
ADF&G Comments	**No position**
Written Public Comments	**None**

STAFF ANALYSIS
WP22-01

ISSUES

Wildlife Proposal WP22-01, submitted by the Office of Subsistence Management (OSM), requests clarification of who is and who is not a participant in a community harvest system and how that affects community and individual harvest limits.

Discussion

The proponent requests specific language clarifying who is and who is not a participant in a community harvest system and how this relates to individual and community harvest limits. While developing the framework for a community harvest system in summer 2020, Ahtna Intertribal Resource Commission (AITRC) representatives and Federal agency staff realized that current Federal regulations stipulate that any animals harvested under a community harvest limit count toward the harvest limits of every community member whether or not they choose to participate in the community harvest system. This provision is perceived as unfair to community members who are not interested in participating in a community harvest system because their individual harvest limits would be met involuntarily by participants in the community harvest system.

This proposal would affect community and individual harvest limits as well as define who is and who is not a participant in a community harvest system for wildlife, fish, and shellfish, statewide. In addition to clarifying who is and who is not a participant in a community harvest system, the intent of this proposal is to allow community members who opt out of a community harvest system to retain their individual harvest limits.

Note: While the proposal as submitted listed the proposed regulations under §100.25(c)(2), the proponent clarified their intention was to create a separate section for these regulations as §100.25(c)(5).

Existing Federal Regulation

> **36 CFR 242.25 and 50 CFR 100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations**
>
> *(c) Harvest limits*
>
> **§_____.26 Subsistence taking of wildlife**
>
> *(e) Possession and transportation of wildlife.*
>
> . . .

(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts towards the community harvest limit for that species. Except for wildlife taken pursuant to §____.10(d)(5)(iii)[1] or as otherwise provided for by this part, an animal taken as part of a community harvest limit counts toward every community member's harvest limit for that species taken under Federal or State of Alaska regulations.

Proposed Federal Regulation

§_____.25 Subsistence taking of fish, wildlife, and shellfish: general regulations

(c) Harvest limits

. . .

(5) Fish, wildlife, or shellfish taken by a participant in a community harvest system counts toward the community harvest limit or quota for that species as well as individual harvest limits, Federal or State, for each participant in that community harvest system, however, the take does not count toward individual harvest limits, Federal or State, of any non-participant. Fish, wildlife, or shellfish taken by someone who is not a participant in a community harvest system does not count toward any community harvest limit or quota.

(i) For the purposes of this provision, all residents of the community are deemed participants in the community harvest unless the Board-approved framework requires registration as a prerequisite to harvesting or receiving any fish, wildlife, or shellfish pursuant to that community harvest, in which case only those who register are deemed participants in that community harvest.

§_____.26 Subsistence taking of wildlife

(e) Possession and transportation of wildlife.

. . .

~~*(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts toward the community harvest limit for that species. Except for wildlife taken pursuant to §____.10(d)(5)(iii) or as otherwise provided for by this part, an animal taken as part of a community harvest limit counts toward every community member's harvest limit for that species taken under Federal or State of Alaska regulations.*~~

State of Alaska Regulations

State general regulations describing its community harvest program are in **Appendix 1.**

1 §____.10(d)(5)(iii) The fish and wildlife is taken by individuals or community representatives permitted a one-time or annual harvest for special purposes including ceremonies and potlatches;

Federal Public Lands

Federal public lands comprise approximately 54% of Alaska statewide and consist of 36% U.S. Fish and Wildlife Service managed lands, 28% Bureau of Land Management managed lands, 25% National Park Service managed lands, and 11% U.S. Forest Service managed lands.

Customary and Traditional Use Determination

This is a statewide proposal for wildlife, fish, and shellfish.

Regulatory History

In 1991, after extensive public comment on the Federal Subsistence Management Program's first Temporary Rule, the Federal Subsistence Board (Board) committed to addressing community harvest limits and alternative permitting processes (56 Fed. Reg. 123, 29311 [June 26, 1991]).

In 1992, responding to approximately 40 proposals requesting community harvest systems and numerous public comments requesting alternative permitting systems, the Board supported the concept of adjusting seasons and harvest limits based on customs and traditions of a community (57 Fed. Reg. 103, 22531–2 [May 28, 1992]). The Board said specific conditions for the use of a particular harvest reporting system may be applied on a case-by-case basis and further development and refinement of guidelines for alternative permitting systems would occur as the Federal Subsistence Management Program evolved (57 Fed. Reg. 104, 22948 [May 29, 1992]). These regulations at ____.6 were modified to state that intent more clearly:

> *§_____.6 Licenses, permits, harvest tickets, tags, and reports*[2]
>
> *(f) The Board may implement harvest reporting systems or permit systems where:*
>
> *(1) The fish and wildlife is taken by an individual who is required to obtain and possess pertinent State harvest permits, tickets, or tags, or Federal permits, harvest tickets, or tags;*
>
> *(2) A qualified subsistence user may designate another qualified subsistence user to take fish and wildlife on his or her behalf;*
>
> *(3) The fish and wildlife is taken by individuals or community representatives permitted a one-time or annual harvest for special purposes including ceremonies and potlatches;*
>
> *(4) The fish and wildlife is taken by representatives of a community permitted to do so in a manner consistent with the community's customary and traditional practices.*

In 1993, the Board adopted Proposal P93-12, which clarified that community harvest limits and individual harvest limits may not be accumulated, community harvest systems will be adopted on a case-by-case basis and defined under unit-specific regulations, and wildlife taken by a designated hunter for another person then counts toward the individual harvest limit of the person for whom the wildlife is taken. These new regulations specified that for wildlife, after taking your individual harvest limit, you may not

2 Subsequently moved to §___.10(d)(5) Federal Subsistence Board—Power and Duties.

continue to harvest in areas outside of your community harvest system area (58 Fed. Reg. 103, 31255 [June 1, 1993]). These new regulations were the following:

> **§____**.25 Subsistence taking of wildlife[3]
>
> *(c) Possession and transportation of wildlife*
>
> *(1) Except as specified in §___.25(c)(3)(ii)* [below] *or (c)(4)* [trapping regulations]*, or as otherwise provided, no person may take a species of wildlife in any Unit, or portion of a Unit, if that person's total statewide take of that species has already been obtained under Federal and State regulations in other Units, or portions of other Units.*
>
> *(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts toward the community harvest for that species. Except for wildlife taken pursuant to §____.6(f)(3)* [above], *an animal taken by an individual as part of a community harvest limit counts toward that individual's bag limit for that species taken under Federal or State regulations for areas outside of the community harvest area.*
>
> *(3) Individual bag limits (i) bag limits authorized by §____.25 and in State regulations may not be accumulated; (ii) Wildlife taken by a designated hunter for another person pursuant to §____6(f)(2)* [above]*, counts toward the individual bag limit of the person for whom the wildlife is taken.*

In 1993, "community harvest systems" were adopted by the Board simply by adding the use of designated hunters to unit-specific regulations for Unit 25 West moose and Unit 26A sheep (58 FR 103, 31252–3 [June 1, 1993]). In this way, designated harvesters and resource quotas became a common method for allocating harvests communally.

In 1996, administrative clarification was made at §____.25(c)(2) to better represent the Board's intent (61 Fed. Reg. 147, 39711 [July 30, 1996]). Before this clarification was made, a member of a community with a community harvest limit who had not taken an individual harvest limit could take an individual harvest limit after the community had met its harvest limit. The effect of the clarification was that members of community in a community harvest system can harvest only as part of the community harvest system:

> **§____**.25 Subsistence taking of wildlife
>
> *(c) Possession and transportation of wildlife*
>
> . . .
>
> *(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts toward the community harvest for that species. Except for wildlife taken pursuant to §____.6(f)(3)* [above], *an animal taken* ~~*by an individual as part of a community harvest limit counts toward that individual's bag limit* ***every community member's harvest limit*** *for that species taken under Federal or State regulations for areas outside of the community harvest area.*~~

3 Subsequently moved to §____.26 Taking of wildlife.

Later, the language "or as otherwise provided for by this part" was added to the provision. The effect was to allow an exceptions to the provision if the exception was placed in regulation:

> *(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts towards the community harvest limit for that species. Except for wildlife taken pursuant to §____.10(d)(5)(iii)* ***or as otherwise provided for by this part****, an animal taken as part of a community harvest limit counts toward every community member's harvest limit for that species taken under Federal or State of Alaska regulations.*

In April 2020, the Board adopted deferred Proposal WP18-19 with modification, which added a community harvest system for moose in Unit 11 and caribou and moose in Unit 13 to unit-specific regulations. The modification was to name individual communities within the Ahtna traditional use territory authorized to harvest moose in Unit 11 and caribou and moose in Unit 13 as part of a community harvest system, subject to a framework established by the Board (see Existing Federal Regulation section in Proposal WP22-36 analysis).

In July 2020, the Board approved Wildlife Special Action WSA20-02 with modification to: (1) name individual communities authorized to participate in the community harvest system on Federal public lands in Units 11, 12, and 13, specifically the eight Ahtna traditional communities of Cantwell, Chistochina, Chitina, Copper Center, Gakona, Gulkana, Mentasta Lake, and Tazlina; (2) define the geographic boundaries of eligible communities as the most recent Census Designated Places established by the U.S. Census Bureau; (3) extend these actions through the end of the wildlife regulatory cycle (June 30, 2022); (4) specify that harvest reporting will take the form of reports collected from hunters by AITRC and be submitted directly to the land managers and OSM, rather than through Federal registration permits, joint State/Federal registration permits, or State harvest tickets; and (5) set the harvest quota for the species and units authorized in the community harvest system as the sum of individual harvest limits for those opting to participate in the system (OSM 2020).

In January 2021, the Board approved Wildlife Special Action WSA20-07 temporarily adding the following language to unit-specific regulations for moose and caribou in Units 11, 12, and 13: "Animals taken by those opting to participate in this community harvest system do not count toward the harvest limits of any individuals who do not opt to participate in this community harvest system." At this meeting, the Board also approved a community harvest system framework that describes additional details about implementation of the system (OSM 2021).

Currently, the following community harvest systems are codified in Federal regulations: Lime Village for Unit 19 caribou and moose; Nikolai for Unit 19 sheep; Anaktuvuk Pass for Units 24 and 26 sheep; Ninilchik for Kasilof River and Kenai River community gillnets for salmon; and Cantwell, Chistochina, Chitina, Copper Center, Gakona, Gulkana, Mentasta Lake, and Tazlina for moose in Unit 11 and caribou and moose in Unit 13.

Current Events Involving the Species

Proposal WP22-36, submitted by AITRC, requests the Board to adopt existing temporary regulations regarding the community harvest system for moose and caribou in Units 11, 12, and 13.

Cultural Knowledge and Traditional Practices

Community harvest and designated harvester provisions provide recognition of the customary and traditional practices of sharing and redistribution of harvests. A host of research supports a need for these alternative permitting systems in Federal subsistence regulations to harmonize fundamental harvesting characteristics of rural Alaskan communities with the Federal Subsistence Management Program. Family-based production is the foundation of the mixed subsistence-cash economy found in rural Alaskan communities (cf. Wolfe 1981, 1987; Wolfe and Walker 1987; Wolfe et al. 1984). Family-based production is when two or more individual households linked by kinship distribute the responsibility to harvest, process, and store wild resources based on factors such as skills and abilities, availability of able workers, sufficient income to purchase harvesting and processing technology, and other factors. Units of family-based production typically contain at least one "super-household" that produces surpluses of wild foods (Wolfe 1987). On a statewide basis, about 30% of households in a community are super-households that produce about 70% or more of the community's wild food harvest (Sahlins 1972; Andrews 1988; Magdanz, Utermohle, and Wolfe 2002; Sumida 1989; Sumida and Andersen 1990). Conversely, 20% to 30% of households in units of family-based production did not produce enough food to feed members of that household (Sahlins 1972). Inequalities in individual and household production levels are equalized via processes of distribution (sharing and feasting) and exchange (trade and barter).

Recent studies on disparities in household food production demonstrate that super-households participate heavily in food-sharing. Wolfe et al. (2007) looked at household food production in 67 rural Alaska communities representing Aleut, Athabascan, Inupiat, Tlingit-Haida, and Yup'ik cultural groups. The majority of these communities were comprised of mostly Alaska Native households with at least one Native head of household, although communities in Southeast Alaska were ethnically mixed. The researchers found that there were household variables commonly associated with levels of food production throughout these communities. Household variables including higher levels of income, participation in commercial fishing, and households with three or more adult males over 15 years of age were associated with higher levels of food production. Households in which there was a single or elder head of household were associated with lower levels of food production. Most remarkably, the study also demonstrated that high-producing households gave the most food to others and giving to other households may be a primary motivation for over-production. Wolfe et al. (2007) further recommended that policy and management regulations account for food production and sharing practices within Alaskan mixed subsistence-cash communities. They wrote:

> *The findings about the concentration of subsistence harvests also have social policy implications for the management of hunts and fisheries. Annual and daily bag limits that require that individuals or households harvest at equal levels, as is common for sport fishing and sport hunting, operate from different principles from those operating in subsistence systems. In the subsistence system, individuals and households commonly are not equivalent producers. Instead, a relatively small segment of high-producers harvest most of the fish or game. The average harvests among community households may be in line with bag and harvest limits required for conservation reasons, but the actual production is concentrated in a small number of households. Flexible regulations that allow for this type of concentrated harvest would be most compatible with the actual patterns of subsistence production (Wolfe et al. 2007:29).*

Community harvest and designated harvester systems in use in the Federal Subsistence Management Program are intended to provide some flexibility in harvest regulations to make legal the activities of

super-households in rural communities. Supporting the distribution of wild foods in villages allows people to continue their subsistence way of life.

Effects of the Proposal

If this proposal is adopted, then Federal regulations will recognize that the Board, when approving the framework for a community harvest system, may allow community members to choose whether they want to participate in the community harvest system or retain their individual harvest limits. The Federal regulations will specify that fish, wildlife, or shellfish harvested under a community harvest system will not count against the individual harvest limits of non-participants. Similarly, fish, wildlife, or shellfish harvested by non-participants will not count against the harvest limit set for the community harvest system. Effects to nonsubsistence uses, wildlife, fish, and shellfish are not anticipated.

If this proposal is not adopted, then Federal regulations will continue to stipulate that any harvest within a community harvest system counts towards the individual harvest limit of every community member regardless of whether they participate in the community harvest system. Additionally, the Board's authority to approve community harvest frameworks, and to allow community members to opt in or opt out of a community harvest, will not be clearly stated. Effects to nonsubsistence uses, wildlife, fish, and shellfish are not anticipated.

OSM CONCLUSION

Support Proposal WP22-01.

Justification

Subsistence users and others will find these regulations less confusing and easier to use. In this way, the proposed regulatory changes provide more equitable harvest options and opportunities for subsistence users. They also prevent unintentional and unnecessary restrictions from being placed on any community members who choose not to participate in a community harvest system and clarifies Federal regulations.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Southeast Alaska Subsistence Regional Advisory Council

Take no action on WP22-01. The Council deferred to regions with community harvest systems.

Southcentral Alaska Subsistence Regional Advisory Council

Support WP22-01. This proposal clarifies that those who are not participants in the community hunt can still hunt under Federal harvest regulations to obtain their individual harvest limit to meet their subsistence harvest needs, and the Ahtna people can continue their customary and traditional ways of hunting.

Kodiak/Aleutians Subsistence Regional Advisory Council

Support WP22-01. The Council appreciated the regulatory clarity provided by the proposal even though their region does not have any community hunts.

Bristol Bay Subsistence Regional Advisory Council

Support WP22-01. The proposal allows a community harvest system in the region to operate under clearer guidelines.

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

Support WP22-01. The Council supports Ahtna people and their community harvest system, which is impacted by individuals who do not want necessarily to share their harvests but whose individual harvest limits are used up by the community harvest limit. Separating those two types of hunters will be helpful by identifying who is and who is not participating in the community harvest system. The proposal will benefit the Yukon Kuskokwim Region if a community harvest system is created

Western Interior Alaska Subsistence Regional Advisory Council

Support WP22-01. The proposal allows people to opt out of a community harvest system and will benefit all subsistence users statewide.

Seward Peninsula Subsistence Regional Advisory Council

Defer WP22-01 to regions with community harvest systems. There are no community harvest systems in our region.

Northwest Arctic Subsistence Regional Advisory Council

Support WP22-01. Customary and traditional patterns of harvest in the region are consistent with community harvest systems in regulation. Hunters distribute their harvests to elders first and then to other households that need it most. The Council also supports the proposal so that regulations are consistent across regions.

Eastern Interior Alaska Subsistence Regional Advisory Council

Support WP22-01. The proposal is beneficial to subsistence users who will find this regulation less confusing.

North Slope Alaska Subsistence Regional Advisory Council

Support WP22-01. Only Federally qualified subsistence users can participate in Federal community harvest systems.

INTERAGENCY STAFF COMMITTEE COMMENTS

The Interagency Staff Committee found the staff analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and Federal Subsistence Board action on the proposal.

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

Wildlife Proposal WP22-01

This proposal seeks to clarify who is and who is not a participant in a community harvest system and how that affects community and individual harvest limits.

Background

While the impetus for this change primarily comes from the action taken by the Federal Subsistence Board (FSB) regarding the WP18-19 proposed by the Ahtna Inter-tribal Resource Commission (AITRC), WP22-01 has implications for any future federal community harvest program as well.

If implemented as stated by OSM this request will ensure that animals taken by those opting to participate in this community harvest system do not count toward the harvest limits of any individuals who do not opt to participate in this community harvest system.

ADF&G would also like to take this opportunity to reiterate the concerns it has expressed in the past over the community harvest system being implemented. We cannot find where Congress authorized the Federal Subsistence Board the ability to delegate administration of a federal subsistence hunt to a tribe or nonprofit organization, or to delegate the authority to determine who is authorized to hunt to a tribe or nonprofit organization, or to limit a hunt to a tribe or nonprofit organization. This system also appears to be inconsistent with ANILCA, as it excludes some rural communities who should be eligible to participate in this community hunt but cannot because they are simply not identified as a community in the Ahtna traditional territory. Some communities can be identified as being within this area; however, are excluded from this community harvest system even when they have a customary and traditional use determination for caribou and moose. Any system put into place should be fair and equitable to federal subsistence hunters in the area.

It is reasonable to assume that there are no concerns at face value if the collective bag limit equals the sum of those individual bag limits. If this isn't adhered to then there could very well be a situation in which you would have over harvest. There are also concerns regarding the harvest reporting aspect, but these are a part of ongoing concerns ADF&G has with other hunts where a lack of reporting leads to unreliable harvest data. All those participating in the community hunt should be issued a permit with their collective bag limit, and hunt reports should be submitted after the season just as a person would with what is required on the stateside with a harvest ticket or registration permit. ADF&G has found that the way in which OSM collects its data, often months after the season, yields poor/incomplete harvest data which causes managers to make much more conservative decisions when determining acceptable harvest rates. This ultimately impacts the available harvest for everyone.

Impact on Subsistence Users

This proposal would reduce the current confusion amongst subsistence users by clarifying who is and who is not a participant in a community harvest system.

Impact on Other Users

If adopted there could be impacts to other users if the federal community harvest system is not adhered to and enforced.

Conservation Issues

Depending on how the allocation to the community hunt program is determined and how timely and complete harvest data is reported there could be conservation issues as overharvest is a very real possibility.

Enforcement Issues

There are no foreseeable enforcement issues with the specific mechanics of this proposal.

Position

ADF&G takes NO POSITION on the specific action being requested in WP22-01. How participation and harvest data is collected and reported needs to be of the same standard as the individual hunt reporting requirements so that proper management can continue to occur, and conservation concerns do not develop due to underreporting. It is necessary for consistent updates to be given to the federal agencies or else have a repeat of the issue with the data request from the community harvest system in GMU 13 in the fall of 2021 occur in the future.

ADF&G still contends that the FSB did not have the authority under ANILCA to approve this system. Congress never authorized the FSB the ability to delegate administration of a federal subsistence hunt to any non-governmental organization, or to delegate the authority to determine who is authorized to hunt to that non-governmental organization.

APPENDIX 1

STATE OF ALASKA COMMUNITY HARVEST PROGRAM

5 AAC 92.074. Community subsistence harvest hunt areas

(a) The commissioner or the commissioner's designee may, under this section and 5 AAC 92.052, issue community-based subsistence harvest permits and harvest reports for big game species where the Board of Game (board) has established a community harvest hunt area under (b) of this section and 5 AAC 92.074.

(b) The board will consider proposals to establish community harvest hunt areas during regularly scheduled meetings to consider seasons and bag limits for affected species in a hunt area. Information considered by the board in evaluating the proposed action will include

(1) a geographic description of the hunt area;

(2) the sustainable harvest and current subsistence regulations and findings for the big game population to be harvested;

(3) a custom of community-based harvest and sharing of the wildlife resources harvested in the hunt area by any group; and

(4) other characteristics of harvest practices in the hunt area, including characteristics of the customary and traditional pattern of use found under 5 AAC 99.010(b).

(c) If the board has established a community harvest hunt area for a big game population, residents of the community or members of a group may elect to participate in a community harvest permit hunt in accordance with the following conditions:

(1) a person representing a group of 25 or more residents or members may apply to the department for a community harvest permit by identifying the community harvest hunt area and the species to be hunted, and by requesting that the department distribute community harvest reports to the individuals who subscribe to the community harvest permit; the community or group representative must

(A) provide to the department the names of residents or members subscribing to the community harvest permit and the residents' or members' hunting license numbers, permanent hunting identification card numbers, or customer service identification numbers, or for those residents or members under 18 years of age, the resident or member's birth date;

(B) ensure delivery to the department of validated harvest reports from hunters following the take of individual game animals, records of harvest information for individual animals taken, and collected biological samples or other information as required by the department for management;

(C) provide the department with harvest information, including federal subsistence harvest information, within a specified period of time when requested, and a final report of all game taken under the community harvest permit within 15 days of the close of the hunting season or as directed in the permit; and

(D) make efforts to ensure that the applicable customary and traditional use pattern described by the board and included by the department as a permit condition, if any, is observed by subscribers including meat sharing; the applicable board finding and conditions will be identified on the permit; this provision does not authorize the community or group administrator to deny subscription to any community resident or group member;

(E) from July 1, 2014 until June 30, 2018, in the community harvest hunt area described in 5 AAC 92.074(d), permits for the harvest of bull moose that do not meet the antler restrictions for other resident hunts in the area will be limited to one permit for every three households in the community or group. Beginning July 1, 2018, in the community harvest hunt area described in 5 AAC 92.074(d) , permits for the harvest of bull moose that do not meet the antler restrictions for other resident hunts in the area will be distributed to participants using the scoring criteria described in 5 AAC 92.070.

(2) a resident of the community or member of the group who elects to subscribe to a community harvest permit

(A) may not hold a harvest ticket or other state hunt permit for the same species where the bag limit is the same or for fewer animals during the same regulatory year; however, a person may hold harvest tickets or permits for same-species hunts in areas with a larger bag limit following the close of the season for the community harvest permit, except that in Unit 13, prior to July 1, 2018, only one caribou may be retained per household, and on or after July 1, 2018, up to two caribou may be retained per household;

(B) may not subscribe to more than one community harvest permit for a species during a regulatory year;

(C) must have in possession when hunting and taking game a community harvest report issued by the hunt administrator for each animal taken;

(D) must validate a community harvest report immediately upon taking an animal; and

(E) must report harvest and surrender validated harvest reports within five days, or sooner as directed by the department, of taking an animal and transporting it to the place of final processing for preparation for human use and provide information and biological samples required under terms of the permit;

(F) must, if the community harvest hunt area is under a Tier II permit requirement for the species to be hunted, have received a Tier II permit for that area, species, and regulatory year.

(G) participants in the community harvest hunt area described in 5 AAC 92.074(d) must commit to participation for two consecutive years. This does not apply to participants that applied in 2016 for the 2018 regulatory year.

(3) in addition to the requirements of (1) of this subsection, the community or group representative must submit a complete written report, on a form provided by the department, for the community or group participating in the community harvest hunt area described in 5 AAC 92.074(d), that describes efforts by the community or group to observe the customary and traditional use pattern described by board findings for the game populations hunted under the conditions of this community harvest permit; in completing the report, the representative must make efforts to collect a complete report from each household that is a member of the community or group that describes efforts by the household to observe the customary and traditional use pattern using the eight elements described in this paragraph; a copy of all household reports collected by the community or group representative shall be submitted to the department as a part of the representative's written report; complete reports must include information about efforts to observe the customary and traditional use pattern of the game population, as follows:

(A) Element 1: participation in a long-term, consistent pattern of noncommercial taking, use, and reliance on the game population: the number of years of taking and use of the game population; and involvement of multiple generations in the taking and use of the game population; and use of areas other than the community subsistence hunt area for harvest activities;

(B) Element 2: participation in the pattern of taking or use of the game population that follows a seasonal use pattern of harvest effort in the hunt area: the months and seasons in which noncommercial harvest activities occur in the hunt area;

(C) Element 3: participation in a pattern of taking or use of wild resources in the hunt area that includes methods and means of harvest characterized by efficiency and economy of effort and cost: costs associated with harvests; and methods used to reduce costs and improve efficiency of harvest; and number of species harvested during hunting activities;

(D) Element 4: participation in a pattern of taking or use of wild resources that occurs in the hunt area due to close ties to the area: number of years of taking and use of the game population; and involvement of multiple generations in the taking and use of the game population; and variety of harvesting activities that take place in the hunt area; and evidence of other areas used for harvest activities;

(E) Element 5: use of means of processing and preserving wild resources from the hunt area that have been traditionally used by past generations: complete listing of the parts of the harvested game that are used; and preservation methods of that game; and types of foods and other products produced from that harvest;

(F) Element 6: participation in a pattern of taking or use of wild resources from the hunt area that includes the handing down of knowledge of hunting skills, values, and lore

about the hunt area from generation to generation: involvement of multiple generations in the taking and use of the game population; and evidence of instruction and training;

(G) Element 7: participation in a pattern of taking of wild resources from the hunt area in which the harvest is shared throughout the community: amount of harvest of the game population that is shared; and evidence of a communal sharing event; and support of those in need through sharing of the harvest of the game population; and

(H) Element 8: participation in a pattern that includes taking, use, and reliance on a wide variety of wild resources from the hunt area: the variety of resource harvest activities engaged in within the hunt area; and evidence of other areas used for harvest activities.

(d) Seasons for community harvest permits will be the same as those established for other subsistence harvests for that species in the geographic area included in a community harvest hunt area, unless separate community harvest hunt seasons are established. The total bag limit for a community harvest permit will be equal to the sum of the individual participants' bag limits, established for other subsistence harvests for that species in the hunt area or otherwise by the board. Seasons and bag limits may vary within a hunt area according to established subsistence regulations for different game management units or other geographic delineations in a hunt area.

(e) Establishment of a community harvest hunt area will not constrain nonsubscribing residents of the community or members of the group from participating in subsistence harvest activities for a species in that hunt area using individual harvest tickets or other state permits authorized by regulation, nor will it require any resident of the community or member of the group eligible to hunt under existing subsistence regulations to subscribe to a community harvest permit.

(f) The department may disapprove an application for a community subsistence harvest permit from a community or group that has previously failed to comply with requirements in (c)(1) and (3) of this section. The failure to report by the community or group representative under (c)(1) and (3) of this section may result in denial of a community subsistence harvest permit during the following regulatory year. The department must allow a representative the opportunity to request a hearing if the representative fails to submit a complete report as required under (c)(1) and (3) of this section. A community or group aggrieved by a decision under this subsection will be granted a hearing before the commissioner or the commissioner's designee, if the community or group representative makes a request for a hearing in writing to the commissioner within 60 days after the conclusion of the hunt for which the person failed to provide a report. The commissioner may determine that the penalty provided under this subsection will not be applied if the community or group representative provides the information required on the report and if the commissioner determines that

(1) the failure to provide the report was the result of unavoidable circumstance; or

(2) extreme hardship would result to the community or group.

(g) A person may not give or receive a fee for the taking of game or receipt of meat under a community subsistence harvest permit.

(h) Nothing in this section authorizes the department to delegate to a community or group representative determination of the lawful criteria for selecting who may hunt, for establishing any special restrictions for the hunt and for the handling of game, and for establishing the terms and conditions for a meaningful communal sharing of game taken under a community harvest permit.

(i) In this section,

(1) "fee" means a payment, wage, gift, or other remuneration for services provided while engaged in hunting under a community harvest permit; and does not include reimbursement for actual expenses incurred during the hunting activity within the scope of the community harvest permit, or a non-cash exchange of subsistence-harvested resources.

(2) a "community" or "group" is a mutual support network of people who routinely (at least several times each year) provide each other with physical, emotional, and nutritional assistance in a multi-generational and inter/intra familial manner to assure the long-term welfare of individuals, the group, and natural resources they depend on; for purposes of this regulation, a "community" or "group" shares a common interest in, and participation in uses of, an identified area and the wildlife populations in that area, that is consistent with the customary and traditional use pattern of that wildlife population and area as defined by the board.

WP22–02 Executive Summary	
General Description	Proposal WP22-02 requests to remove language from designated hunting regulations prohibiting the use of a designated hunter permit by a member of community operating under a community harvest system. *Submitted by the Office of Subsistence Management.*
Proposed Regulation	See page 523
OSM Conclusion	**Support**
Southeast Alaska Subsistence Regional Advisory Council Recommendation	**Take no action**
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	**Support**
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	**Support**
Bristol Bay Subsistence Regional Advisory Council Recommendation	**Support** WP22-02 **with the Eastern Interior Council's modification**
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	**Support**
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	**Support**
Seward Peninsula Subsistence Regional Advisory Council Recommendation	**Defer** WP22-02 to regions with community harvest systems
Northwest Arctic Subsistence Regional Advisory Council Recommendation	**Support**
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	**Support** WP22-02 **with modification** to clarify participants in a community harvest system cannot designate another Federally qualified subsistence user to take wildlife on their behalf.
North Slope Subsistence Regional Advisory Council Recommendation	**Support**

WP22–02 Executive Summary	
Interagency Staff Committee Comments	The Interagency Staff Committee found the staff analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and Federal Subsistence Board action on the proposal.
ADF&G Comments	**Support**
Written Public Comments	**None**

STAFF ANALYSIS
WP22-02

ISSUES

Wildlife Proposal WP22-02, submitted by the Office of Subsistence Management (OSM), requests to remove language from designated hunting regulations prohibiting the use of a designated hunter permit by a member of community operating under a community harvest system.

Discussion

While developing the framework for a community harvest system in summer 2020, Ahtna Intertribal Resource Commission (AITRC) representatives realized that residents of communities in a community harvest system cannot designate another person to harvest on their behalf, pursuant to Federal designated hunter regulations. AITRC and Federal agency staff perceived this provision as unfair to community members who choose not to participate in a community harvest system because their options for acquiring their individual harvest limits are curtailed involuntarily.

The proponent clarified that the intent of this proposal is to allow members of a community with a community harvest system to request a hunter to harvest on their behalf to fulfill either their individual harvest limit or to count toward the community harvest limit depending on whether or not they choose to participate in the community harvest system.

Existing Federal Regulation

> *36 CFR 242 and 50 CFR 100.25(e)* **Hunting by designated harvest permit**
>
> **If you are a Federally qualified subsistence user (recipient), you may designate another Federally qualified subsistence user to take deer, moose, and caribou, and in Units 1-5, goats, on your behalf unless you are a member of a community operating under a community harvest** *system or unless unit-specific regulations in §____.26 preclude or modify the use of the designated hunter system or allow the harvest of additional species by a designated hunter. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than two harvest limits in his/her possession at any one time except for goats, where designated hunters may have no more than one harvest limit in possession at any one time, and unless otherwise specified in unit-specific regulations in §____.26.*
>
> *§_____.26***(n)(6)(ii) Unit 6 specific regulations**
>
> *(D) A federally qualified subsistence user (recipient) who is either blind, 65 years of age or older, at least 70 percent disabled, or temporarily disabled may designate another federally qualified subsistence user to take any moose, deer, black bear, and beaver on his or her behalf in Unit 6, and goat in Unit 6D, unless the recipient is a member of a community operating under a community harvest system. The designated hunter must obtain a designated hunter permit*

and must return a completed harvest report. The designated hunter may hunt for any number of recipients, but may have no more than one harvest limit in his or her possession at any one time.

*§_____.26***(n)(9)(iii) Unit 9 specific regulations**

(E) For Units 9C and 9E only, a federally qualified subsistence user (recipient) of Units 9C and 9E may designate another federally qualified subsistence user of Units 9C and 9E to take bull caribou on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report and turn over all meat to the recipient. There is no restriction on the number of possession limits the designated hunter may have in his/her possession at any one time.

(F) For Unit 9D, a federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take caribou on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than four harvest limits in his/her possession at any one time.

*§_____.26***(n)(10) Unit 10 specific regulations**

(iii) In Unit 10—Unimak Island only, a federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take caribou on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than four harvest limits in his/her possession at any one time.

*§_____.26***(n)(22)(iii) Unit 22 specific regulations**

(E) A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take musk oxen on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must get a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients in the course of a season, but have no more than two harvest limits in his/her possession at any one time, except in Unit 22E where a resident of Wales or Shishmaref acting as a designated hunter may hunt for any number of recipients, but have no more than four harvest limits in his/her possession at any one time.

*§_____.26***(n)(23)(iv) Unit 23 specific regulations**

(D) For the Baird and DeLong Mountain sheep hunts—A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take sheep on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for only one recipient in the course

of a season and may have both his and the recipients' harvest limits in his/her possession at the same time.

(F) A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take musk oxen on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must get a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients, but have no more than two harvest limits in his/her possession at any one time.

*§_____.26***(n)(26)(iv) Unit 26 specific regulations**

(C) In Kaktovik, a federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take sheep or musk ox on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than two harvest limits in his/her possession at any one time.

(D) For the DeLong Mountain sheep hunts—A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take sheep on his or her behalf unless the recipient is a member of a community operating under a community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for only one recipient in the course of a season and may have both his and the recipient's harvest limits in his/her possession at the same time.

Proposed Federal Regulation

§_____.25(e) Hunting by designated harvest permit

If you are a Federally qualified subsistence user (recipient), you may designate another Federally qualified subsistence user to take deer, moose, and caribou, and in Units 1-5, goats, on your behalf ~~unless you are a member of a community operating under a community harvest system or~~ unless unit-specific regulations in §100.26 preclude or modify the use of the designated hunter system or allow the harvest of additional species by a designated hunter. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than two harvest limits in his/her possession at any one time except for goats, where designated hunters may have no more than one harvest limit in possession at any one time, and unless otherwise specified in unit-specific regulations in §100.26.

*§_____.26***(n)(6)(ii) Unit 6 specific regulations**

(D) A federally qualified subsistence user (recipient) who is either blind, 65 years of age or older, at least 70 percent disabled, or temporarily disabled may designate another federally qualified subsistence user to take any moose, deer, black bear, and beaver on his or her behalf in Unit 6, and goat in Unit 6D, ~~unless the recipient is a member of a community operating under a community harvest system.~~ The designated hunter must obtain a designated hunter permit

and must return a completed harvest report. The designated hunter may hunt for any number of recipients, but may have no more than one harvest limit in his or her possession at any one time.

*§_____.26***(n)(9)(iii) Unit 9 specific regulations**

(E) For Units 9C and 9E only, a federally qualified subsistence user (recipient) of Units 9C and 9E may designate another federally qualified subsistence user of Units 9C and 9E to take bull caribou on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest system~~. The designated hunter must obtain a designated hunter permit and must return a completed harvest report and turn over all meat to the recipient. There is no restriction on the number of possession limits the designated hunter may have in his/her possession at any one time.

(F) For Unit 9D, a federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take caribou on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest system~~. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than four harvest limits in his/her possession at any one time.

*§_____.26***(n)(10) Unit 10 specific regulations**

(iii) In Unit 10—Unimak Island only, a federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take caribou on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest system~~. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than four harvest limits in his/her possession at any one time.

*§_____.26***(n)(22)(iii) Unit 22 specific regulations**

(E) A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take musk oxen on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest system~~. The designated hunter must get a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients in the course of a season, but have no more than two harvest limits in his/her possession at any one time, except in Unit 22E where a resident of Wales or Shishmaref acting as a designated hunter may hunt for any number of recipients, but have no more than four harvest limits in his/her possession at any one time.

*§_____.26***(n)(23)(iv) Unit 23 specific regulations**

(D) For the Baird and DeLong Mountain sheep hunts—A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take sheep on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest system~~. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for only one recipient in the course

of a season and may have both his and the recipients' harvest limits in his/her possession at the same time.

(F) A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take musk oxen on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest system.~~ The designated hunter must get a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients, but have no more than two harvest limits in his/her possession at any one time.

*§_____.26***(n)(26)(iv) Unit 26 specific regulations**

(C) In Kaktovik, a federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take sheep or musk ox on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest syste~~m. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than two harvest limits in his/her possession at any one time.

(D) For the DeLong Mountain sheep hunts—A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take sheep on his or her behalf ~~unless the recipient is a member of a community operating under a community harvest system~~. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for only one recipient in the course of a season and may have both his and the recipient's harvest limits in his/her possession at the same time.

Existing State Regulation

The State of Alaska provides for the transfer of harvest limits from one person to another through its proxy hunting program (5 AAC 92.011; see Appendix 1). Table 1 is a side-by-side comparison of the State's proxy system to the Federal designated hunter system.

Table 1. State of Alaska Proxy System compared to Federal Designated Hunter System.

State of Alaska Proxy System	Federal Subsistence Management Program Designated Hunter System
Applies where there is an open State harvest season.	Applies to Federal public lands when there is an open Federal harvest season.
Applies to caribou, deer, and moose.	Applies to caribou, deer, moose, and in Units 1–5, goats, as well as other species identified in unit-specific regulations.
Available to a hunter who is blind, physically or developmentally disabled (requires physician's affidavit), or 65 years of age or older	Available to Federally qualified subsistence users.
Either the recipient or the hunter may apply for the authorization.	Recipient obtains a permit or harvest ticket and designates another Federally qualified subsistence user to harvest on his/her behalf. Designated hunter obtains a Federal designated hunter permit.
No person may be a proxy for more than one recipient at a time.	A person may hunt for any number of recipients, but may have no more than two harvest limits in his/her possession at any one time.

Federal Public Lands

Federal public lands comprise approximately 54% of Alaska statewide and consist of 36% U.S. Fish and Wildlife Service managed lands, 28% Bureau of Land Management managed lands, 25% National Park Service managed lands, and 11% U.S. Forest Service managed lands.

Customary and Traditional Use Determination

This is a statewide proposal regarding wildlife.

Regulatory History

In 1991, after extensive public comment on the Federal Subsistence Management Program's first Temporary Rule, the Federal Subsistence Board committed to addressing community harvest limits and alternative permitting processes (56 Fed. Reg. 123, 29411 [June 26, 1991]).

In 1992, responding to approximately 40 proposals requesting community harvest systems and numerous public comments requesting alternative permitting systems, the Board supported the concept of adjusting seasons and harvest limits based on customs and traditions of a community (57 Fed. Reg. 103, 22531–2 [May 28, 1992]). The Board said specific conditions for the use of a particular harvest reporting system may be applied on a case-by-case basis and further development and refinement of guidelines for alternative permitting systems would occur as the Federal Subsistence Management Program evolved (57 Fed. Reg. 104, 22948 [May 29, 1992]. These regulations at ____.6 were modified to state that intent more clearly:

§_____.6 Licenses, permits, harvest tickets, tags, and reports[1]

(f) The Board may implement harvest reporting systems or permit systems where:

(1) The fish and wildlife is taken by an individual who is required to obtain and possess pertinent State harvest permits, tickets, or tags, or Federal permits, harvest tickets, or tags;

(2) A qualified subsistence user may designate another qualified subsistence user to take fish and wildlife on his or her behalf;

(3) The fish and wildlife is taken by individuals or community representatives permitted a one-time or annual harvest for special purposes including ceremonies and potlatches;

(4) The fish and wildlife is taken by representatives of a community permitted to do so in a manner consistent with the community's customary and traditional practices.

In 1993, the Board adopted Proposal P93-12, which clarified that community harvest limits and individual harvest limits may not be accumulated, community harvest systems will be adopted on a case-by-case basis and defined under unit-specific regulations, and wildlife taken by a designated hunter for another person counts toward the individual harvest limit of the person for whom the wildlife is taken. These new regulations specified that for wildlife, after taking your individual harvest limit, you may not continue to harvest in areas outside of your community harvest area (58 Fed. Reg. 103, 31255 [June 1, 1993]). These new regulations were the following:

§____.25 Subsistence taking of wildlife[2]

(c) Possession and transportation of wildlife

(1) Except as specified in §___.25(c)(3)(ii) [below] *or (c)(4)* [trapping regulations]*, or as otherwise provided, no person may take a species of wildlife in any Unit, or portion of a Unit, if that person's total statewide take of that species has already been obtained under Federal and State regulations in other Units, or portions of other Units.*

(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts toward the community harvest for that species. Except for wildlife taken pursuant to §____.6(f)(3) [above], *an animal taken by an individual as part of a community harvest limit counts toward that individual's bag limit for that species taken under Federal or State regulations for areas outside of the community harvest area.*

(3) Individual bag limits (i) bag limits authorized by §____.25 and in State regulations may not be accumulated; (ii) Wildlife taken by a designated hunter for another person pursuant to §____6(f)(2) [above]*, counts toward the individual bag limit of the person for whom the wildlife is taken.*

In 1993, community harvest strategies were adopted by the Board simply by adding the use of designated hunters into unit-specific regulations for Unit 25 West moose and Unit 26C sheep (58 Fed. Reg. 103,

1 Subsequently moved to §___.10(d) Federal Subsistence Board—Power and Duties.

2 Subsequently moved to §____.26 Taking of wildlife.

31252–3 [June 1, 1993]). In this way, designated harvesters and resource quotas became a common method for allocating harvests communally.

> *Unit 25(D)(West)—. . .1 antlered moose by a Federal registration permit. Alternate permits allowing for designated hunters are available to qualified applicants who reside in Beaver, Birch Creek, or Stevens Village. Moose hunting on public land in this portion of Unit 25(D)(West) is closed at all times except for residents of Beaver, Birch Creek and Stevens Village during seasons identified above. The moose season will be closed when 30 antlered moose have been harvested in the entirety of Unit 25D West* (58 Fed. Reg. 103, 31287 [June 1, 1993]).

> *Unit 26(C)—3 sheep per year; the Aug. 10–Sept 20 season is restricted to 1 ram with 7/8 cur1 horn or larger. A State registration permit is required for the Oct. 1–Apr. 30 season, except for residents of the City of Kaktovik. Kaktovik residents may harvest sheep in accordance with a Federal community harvest strategy for Unit 26(C) which provides for the take of up to two bag limits of 3 sheep by designated hunter. Procedures for Federal permit issuance and community reporting will be mutually developed by Kaktovik and Federal representatives prior to the season opening. Open season: Aug. 10–Sept. 30 and Oct. 1–Apr. 30 (58 Fed. Reg. 103, 31289 [June 1, 1993]).*

In 1994, the Board rejected four proposals concerning the use of designated hunters to harvest wildlife for others and redirected staff to work with Regional Advisory Councils and develop regulations for the 1995/96 regulatory year that address designated harvesters on a state-wide basis (59 Fed. Reg. 29033, June 3, 1994).

In October 1994, a Designated Hunter Task Force published its report describing four options for alternative permitting systems (OSM 1994).

In 1996, administrative clarification was made at §____.25(c)(2) to better represent the Board's intent (61 Fed. Reg. 147, 39711 [July 30, 1996]). Before this clarification was made, a member of a community with a community harvest limit who had not taken an individual harvest limit could take an individual harvest limit after the community had met its harvest limit. The effect of the clarification was that members of community in a community harvest system can harvest only as part of the community harvest system:

> **§____**.25 Subsistence taking of wildlife
>
> *(c) Possession and transportation of wildlife*
>
> . . .
>
> *(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts toward the community harvest for that species. Except for wildlife taken pursuant to §____.6(f)(3) [above], an animal taken ~~by an individual~~ as part of a community harvest limit counts toward ~~that individual's bag limit~~ **every community member's harvest limit** for that species taken under Federal or State regulations ~~for areas outside of the community harvest area.~~*

Later, the language "or as otherwise provided for by this part" was added to the provision. The effect was to allow an exception to the provision if the exception was placed in regulation:

(2) An animal taken under Federal or State regulations by any member of a community with an established community harvest limit for that species counts towards the community harvest limit for that species. Except for wildlife taken pursuant to §____.10(d)(5)(iii) ***or as otherwise provided for by this part****, an animal taken as part of a community harvest limit counts toward every community member's harvest limit for that species taken under Federal or State of Alaska regulations.*

In 2001, administrative clarifications were added to regulations at §____.25(e) *Hunting by designated harvest permit.* New provisions stipulated that a designated hunter recipient may not be a member of a community operating under a community harvest system, reflecting §____.25(c)(2), above (66 Fed. Reg. 122, 33758 [June 25, 2001]). These new provisions were the following:

§____.25 Subsistence taking of fish, wildlife, and shellfish: general regulations[3]

(e) Hunting by designated harvest permit

(1) As allowed by §____.26 [Subsistence taking of wildlife]*, if you are a Federally-qualified subsistence user, you (beneficiary) may designate another Federally-qualified subsistence user to take wildlife on your behalf unless you are a member of a community operating under a community harvest system.*

(2) The designated hunter must obtain a designated hunter permit and must return a completed harvest report.

(3) You may not designate more than one person to take or attempt to take fish on your behalf at one time.

(4) The designated hunter may hunt for any number of recipients but may have no more than two harvest limits in his/her possession at any one time, unless otherwise specified in §____.26.

After 1994, the Board recommenced adopting designated harvester provisions in unit-specific regulations through 2002.

Prior to 2003, the Board adopted designated hunter regulations for 21 unit-specific hunts. In 2003, the Board established the statewide designated hunter system, based on Regional Advisory Council recommendations, providing opportunities for subsistence users to receive deer, caribou, and moose from designated hunters, subject to unit-specific regulations to include other species and special provisions (68 Fed. Reg. 38466 [June 27, 2003]). Where Councils agreed with these general statewide provisions, then unit-specific regulations were rescinded unless they included other species or special provisions.

In April 2020, the Board adopted deferred Proposal WP18-19 with modification to establish a community harvest system for moose in Unit 11 and caribou and moose in Unit 13 that will be administered by the Ahtna Intertribal Resource Commission (AITRC). The modification was to name individual communities within the Ahtna traditional use territory authorized to harvest caribou and moose in Unit 13 and moose in Unit 11 as part of a community harvest system, subject to a framework established by the Board under unit specific regulations. While developing the framework for the community harvest system

3 §____.25 was formerly *Subsistence taking of wildlife* that was moved to §____.26 to make room for these *general regulations*.

over the summer of 2020, AITRC representatives and Federal agency staff realized that current Federal regulations prevent the use of designated hunters by any community member whether or not they choose to participate in the community harvest system (OSM 2020). In January 2021, the Board approved the community harvest system framework that describes additional details about implementation of the system (OSM 2021a).

Harvest History

The Designated Hunter Permit database is maintained at the Office of Subsistence Management. **Table 2** describes the use of the designated hunter system since 2002 when the permit system was implemented. Designated hunters have reported harvesting caribou, deer, moose, sheep, goats, and muskoxen. Most of the reported harvest by designated hunters is for deer (84%, or 4,717 deer), and most of those are taken in Southeast Alaska (Units 1–5). Designated hunter harvests of caribou account for 12% (658 caribou), and moose 4% (212 moose).

Table 2. Use of Federal designated hunter system based on completed harvest reports 2002-2020 cumulative, by species and management unit (OSM 2021b).

Management Unit	Number of Animals Harvested by Designated Hunters – 2002-2020
Caribou	
9	4
12	109
13	477
17	8
18	6
20	31
Unknown	23
Total	658

Management Unit	Number of Animals Harvested by Designated Hunters – 2002-2020
Dall Sheep	
23	3
Deer	
1	57
2	873
3	1,178
4	1,858
5	11
6	3
8	682
Unknown	55
Total	4,717

Management Unit	Number of Animals Harvested by Designated Hunters – 2002-2020
Moose	
1	9
3	9
5	34
6	36
11	7
12	1
13	67
15	18
18	3
19	12
21	2
24	5
25	1
26	2
Unknown	6
Total	212

Management Unit	Number of Animals Harvested by Designated Hunters – 2002-2020
Mountain Goats	
1	1
4	5
Total	6

Management Unit	Number of Animals Harvested by Designated Hunters – 2002-2020
Muskoxen	
22	3

Cultural Knowledge and Traditional Practices

See the Cultural Knowledge and Traditional Practices section in the Proposal WP22-01 analysis.

Effects of the Proposal

If this proposal is adopted, then Federal designated hunter regulations will no longer preclude members of communities within community harvest systems from requesting another person to take wildlife on their behalf to fulfill either their individual harvest limit or count toward the community harvest limit, depending on whether or not they choose to participate in the community harvest system. Effects to nonsubsistence uses or wildlife are not anticipated.

If this proposal is not adopted, then Federal designated hunting regulations will continue to preclude residents of communities within community harvest systems from designating another person to take wildlife on their behalf, even though they choose not to participate in the community harvest system. Effects to nonsubsistence uses or wildlife are not anticipated.

OSM CONCLUSION

Support Proposal WP22-02.

Justification

The intent of the proposed regulation change is to allow members of a community within community harvest systems to request another person to harvest on their behalf to meet either their individual harvest limit or count toward the community harvest limit depending on whether or not they choose to participate in the community harvest system. Therefore, the statements in general and unit-specific regulations addressed by this proposal, WP22-02, will no longer be relevant and should be removed. Additionally, these regulatory changes will provide more harvest options and opportunities for subsistence users.

LITERATURE CITED

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OSM. 2021a. Federal Subsistence Board News Release, February 3, 2021: Federal Subsistence Board approves changes to subsistence fishing regulations. https://www.doi.gov/subsistence/news/general/federal-subsistence-board-approves-changes-subsistence-fishing-0. Retrieved July 14, 2021. Office of Subsistence Management, USFWS, Anchorage, AK.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Southeast Alaska Subsistence Regional Advisory Council

Take no action WP22-02. There are no community harvest systems in Southeast Alaska. The Council deferred to regions with community harvest systems.

Southcentral Alaska Subsistence Regional Advisory Council

Support WP22-02. The proposal provides more opportunity for people to hunt. This proposal allows members of a community with a community harvest system to designate another person to harvest on their behalf. This benefits subsistence users by providing more opportunity for hunting and increasing the chances that subsistence users can get meat in their freezer. The ability to meet subsistence harvest needs benefits subsistence users.

Kodiak/Aleutians Subsistence Regional Advisory Council

Support WP22-02. The Council based their decision to support this proposal on the OSM justification. The intent of the proposed regulation change is to allow members of a community with a community harvest system to designate another person to harvest on their behalf to meet their individual harvest limit if they do not participate in the community hunt, pursuant to Federal designated harvester regulations. Therefore, the statements in general and unit-specific regulations addressed by this proposal, WP22-02, will no longer be relevant and should be removed. Additionally, these regulatory changes will provide more equitable harvest options and opportunities for subsistence users.

Bristol Bay Subsistence Regional Advisory Council

Support WP22-02 with the Eastern Interior Council's modification to clarify participants in a community harvest system cannot designate another Federally qualified subsistence user to take wildlife on their behalf. Adding clarity to the regulation protects the rights and opportunities of the individual who cares to hunt separately. These hunting regulations would be simpler, provide clarity and protect the hunting opportunity of individual Federally qualified subsistence users.

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

Support WP22-02. The Council supports Ahtna people and their community harvest system. The proposal will benefit the Yukon Kuskokwim Region if a community harvest system is created.

Western Interior Alaska Subsistence Regional Advisory Council

Support WP22-02. The proposal supports our neighbors in the Ahtna region.

Seward Peninsula Subsistence Regional Advisory Council

Defer WP22-01 to regions with community harvest systems. There are no community harvest systems in our region.

Northwest Arctic Subsistence Regional Advisory Council

Support WP22-02. The proposal clarifies how these systems work and concurs with recommendations of other Councils.

Eastern Interior Alaska Subsistence Regional Advisory Council

Support WP22-02 with modification to clarify participants in a community harvest system cannot designate another Federally qualified subsistence user to take wildlife on their behalf. The modification was recommended by a representative of the Ahtna Intertribal Resource Commission and also the Wrangell-St. Elias National Park Resource Subsistence Commission. This modification will allow people outside of a community harvest system to have a designated hunter to meet their subsistence needs. This will be beneficial to subsistence users.

The modified regulation should read:

§_____.25(e) Hunting by designated harvest permit

If you are a Federally qualified subsistence user (recipient), you may designate another Federally qualified subsistence user to take deer, moose, and caribou, and in Units 1-5, goats, on your behalf unless you are a ~~member of community operating under~~ ***participant in a*** *community harvest system or unless unit-specific regulations in §100.26 preclude or modify the use of the designated hunter system or allow the harvest of additional species by a designated hunter. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than two harvest limits in his/her possession at any one time except for goats, where designated hunters may have no more than one harvest limit in possession at any one time, and unless otherwise specified in unit-specific regulations in §100.26.*

§_____.26(n)(6)(ii) Unit 6 specific regulations

(D) A federally qualified subsistence user (recipient) who is either blind, 65 years of age or older, at least 70 percent disabled, or temporarily disabled may designate another federally qualified subsistence user to take any moose, deer, black bear, and beaver on his or her behalf in Unit 6, and goat in Unit 6D, unless the recipient is a ~~member of community operating under~~ ***participant in a community*** *harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients, but may have no more than one harvest limit in his or her possession at any one time.*

§_____.26(n)(9)(iii) Unit 9 specific regulations

(E) For Units 9C and 9E only, a federally qualified subsistence user (recipient) of Units 9C and 9E may designate another federally qualified subsistence user of Units 9C and 9E to take bull caribou on his or her behalf unless the recipient is a ~~member of community operating under~~ ***participant in a*** *community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report and turn over all meat to the recipient. There is no restriction on the number of possession limits the designated hunter may have in his/her possession at any one time.*

(F) For Unit 9D, a federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take caribou on his or her behalf unless the recipient is a ~~member of community operating under~~ ***participant in a*** *community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than four harvest limits in his/her possession at any one time.*

§_____.26(n)(10) Unit 10 specific regulations

(iii) In Unit 10—Unimak Island only, a federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take caribou on his or her behalf unless the recipient is a ~~member of community operating under~~ ***participant in a*** *community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than four harvest limits in his/her possession at any one time.*

§_____.26(n)(22)(iii) Unit 22 specific regulations

(E) A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take musk oxen on his or her behalf unless the recipient is a ~~member of community operating under~~ ***participant in a*** *community harvest system. The designated hunter must get a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients in the course of a season, but have no more than two harvest limits in his/her possession at any one time, except in Unit 22E where a resident of Wales or Shishmaref acting as a designated hunter may hunt for any number of recipients, but have no more than four harvest limits in his/her possession at any one time.*

§_____.26(n)(23)(iv) Unit 23 specific regulations

(D) For the Baird and DeLong Mountain sheep hunts—A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take sheep on his or her behalf unless the recipient is a ~~member of community operating under~~ ***participant in a*** *community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for only one recipient in the course of a season and may have both his and the recipients' harvest limits in his/her possession at the same time.*

(F) A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take musk oxen on his or her behalf unless the recipient is a ~~member of community operating under~~ ***participant in a*** *community harvest system. The designated hunter must get a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients, but have no more than two harvest limits in his/her possession at any one time.*

§_____.26(n)(26)(iv) Unit 26 specific regulations

(C) In Kaktovik, a federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take sheep or musk ox on his or her behalf unless the recipient

is a ~~member of community operating under~~ ***participant in a*** *community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for any number of recipients but may have no more than two harvest limits in his/her possession at any one time.*

(D) For the DeLong Mountain sheep hunts—A federally qualified subsistence user (recipient) may designate another federally qualified subsistence user to take sheep on his or her behalf unless the recipient is a ~~member of community operating under~~ ***participant in a*** *community harvest system. The designated hunter must obtain a designated hunter permit and must return a completed harvest report. The designated hunter may hunt for only one recipient in the course of a season and may have both his and the recipient's harvest limits in his/her possession at the same time.*

North Slope Alaska Subsistence Regional Advisory Council

Support WP22-02. The proposal is beneficial to meeting subsistence needs because that need sometimes is not met by elders and those who are disabled.

INTERAGENCY STAFF COMMITTEE COMMENTS

The Interagency Staff Committee found the staff analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and Federal Subsistence Board action on the proposal.

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

Wildlife Proposal WP22-02

This proposal seeks to allow those individuals who live in communities operating under a federal community harvest system to utilize the designated hunter program if they choose not to participate in the community harvest system.

Background

While the impetus for this change primarily comes from the action taken by the Federal Subsistence Board (FSB) regarding the WP18-19 proposed by the Ahtna Inter-tribal Resource Commission, WP22-01 has implications for any future federal community harvest program as well. Currently, a member of a community eligible under a federal community harvest system may not designate a hunter to hunt on their behalf if they choose not to participate in the community harvest system.

It is reasonable to assume that there are no concerns at face value if the collective bag limit equals the sum of those individual bag limits. If this isn't adhered to then there could very well be a situation in which you would have over harvest. There are also concerns regarding the harvest reporting aspect, but these are a part of ongoing concerns ADF&G has with other hunts where a lack of reporting leads to unreliable harvest data. Harvest reports should be submitted after the season just as a person would with what is required on the stateside with a harvest ticket or registration permit. ADF&G has found that the way in which OSM collects its data, often months after the season, yields poor/incomplete harvest data which causes managers to make much more conservative decisions when determining acceptable harvest rates. This ultimately impacts the available harvest for everyone.

Impact on Subsistence Users

This proposal would reduce the current confusion among subsistence users by clarifying who is and who is not a participant in a community harvest system. It would allow subsistence users who reside in designated communities but choose not to participate in the community harvest system to be able to use a designated hunter through traditional federal designated hunter permits.

Impact on Other Users

If adopted there could be impacts to other users if the federal community harvest system is not adhered to and enforced.

Conservation Issues

Depending on how the allocation to the community hunt program is determined it could present conservation issues as overharvest is a very real possibility, especially for otherwise protected age-class bulls.

Enforcement Issues

There are always enforcement concerns when a new hunt system is put into place.

Position

While ADF&G SUPPORTS the specific action being requested in WP22-01, we have to stress that it will be imperative that timely and accurate harvest information is collected. What ADF&G experienced in requesting harvest data in the fall of 2021 is a perfect example. Multiple contacts had to be made at both BLM and OSM in order to obtain that data. Not only is this information important for inseason management decisions, if this is not done, the likelihood for overharvest becomes more probable and conservation concerns would then occur. Furthermore, all federal hunt reports for moose in GMU 13 should include antler data (spread, brow tines, total points for spike or fork) for hunt managers to be able to make accurate management decisions in an area with substantial harvest of bull moose that are in otherwise protected age classes.

ADF&G would like to take this opportunity to reiterate the concerns it has expressed in the past over the community harvest system being implemented. We cannot find where Congress authorized the Federal Subsistence Board the ability to delegate administration of a federal subsistence hunt to a tribe or nonprofit organization, or to delegate the authority to determine who is authorized to hunt to a tribe or nonprofit organization, or to limit a hunt to a tribe or nonprofit organization.

APPENDIX 1

STATE PROXY HUNTING REGULATIONS

5 AAC 92.011. Taking of game by proxy

(a) A resident hunter (the proxy) holding a valid resident hunting license may take specified game for another resident (the beneficiary) who is blind, physically or developmentally disabled, or 65 years of age or older, as authorized by AS 16.05.405 and this section.

(b) Both the beneficiary and the proxy must possess copies of a completed proxy authorization form issued by the department. The completed authorization must include

(1) names, addresses, hunting license numbers, and signatures of the proxy and the beneficiary;

(2) number of the required harvest ticket report or permit harvest report;

(3) effective dates of the authorization; and

(4) signature of the issuing agent.

(c) A proxy authorization may not be used to take a species of game for a beneficiary for more than the length of the permit hunt season listed on the proxy authorization or for the maximum length of the species general season listed on the proxy authorization.

(d) A person may not be a proxy

(1) for more than one beneficiary at a time;

(2) more than once per season per species in Unit 13;

(3) for Tier II Caribou in Unit 13, unless the proxy is a Tier II permittee;

(4) for more than one person per regulatory year for moose in Units 20(A) and 20(B).

(e) Repealed 7/26/97.

(f) A proxy who takes game for a beneficiary shall, as soon as practicable, but not later than 30 days after taking game, personally deliver all parts of the game removed from the field to the beneficiary.

(g) Except for reporting requirements required by (h) of this section, a proxy who hunts or kills game for a beneficiary is subject to all the conditions and requirements that would apply to the beneficiary if the beneficiary personally hunted or killed the game.

(h) Reporting requirements for proxy and beneficiary are as follows:

(1) if the proxy takes the bag limit for the beneficiary, the proxy shall provide the beneficiary with all the information necessary for the beneficiary to complete and return the harvest ticket report or permit harvest report, as required by regulation, to the department within the time periods specified for such reports; the beneficiary is responsible for the timely return of the harvest ticket and permit harvest reports;

(2) if the proxy is unsuccessful or does not take the bag limit for the beneficiary, the proxy shall provide the beneficiary with any information necessary for the beneficiary to complete and return the harvest ticket report or permit harvest report, as required by regulation, to the department within the time periods specified for such reports; the beneficiary is responsible for the timely return of the harvest ticket and permit harvest reports;

(3) the department may require the proxy to complete a proxy hunter report issued with the authorization form and mail it to the department within 15 days after the effective period of the authorization.

(i) A person may not give or receive remuneration in order to obtain, grant, or influence the granting of a proxy authorization.

(j) A proxy participating in a proxy hunt must remove at least one antler from the skull plate or cut the skull plate in half, on an antlered animal, for both the proxy's animal and the beneficiary's animal before leaving the kill site, unless the department has established a requirement that complete antlers and skull plates must be submitted to the department.

(k) Proxy hunting under this section is only allowed for

(1) caribou;

(2) deer;

(3) moose in Tier II hunts, any-bull hunts, and antlerless moose hunts; and

(4) emperor geese.

(l) Notwithstanding (k) of this section, proxy hunting is prohibited in the following hunts where the board has determined that the use of the proxy would allow circumvention of harvest restrictions specified by the board, or where the board has otherwise directed:

(1) Unit 20(E) moose registration hunts and Units 20(B), 20(D), 20(E), 20(F), and 25(C) Fortymile and White Mountains caribou registration hunts;

(2) Units 21(B), 21(C), 21(D), and 24 moose hunts if either the proxy or the beneficiary holds a drawing permit for Units 21(B), 21(C), 21(D), or 24 moose hunts;

(3) Units 9(A) and 9(B), unit 9(C), that portion within the Alagnak River drainage, and units 17(B), 17(C), 18, 19(A), and 19(B) caribou hunts from August 1 through October 31;

(4) Unit 5(A) deer hunts from October 15 through October 31;

(5) Unit 20(D), within the Delta Junction Management Area, the moose drawing hunt for qualified disabled veterans.

WP22-03 Executive Summary	
General Description	Proposal WP22-03 requests that all wolves taken in Unit 2 be sequentially numbered/marked by the hunter or trapper, that hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and that all hides must be sealed within 15 days of take. *Submitted by: Alaska Department of Fish and Game.*
Proposed Regulation	**Unit 2 –Wolf Hunting** *No limit.* **Sept. 1-Mar. 31.** *Any wolf taken in Unit 2 ~~must be sealed within 30 days of the end of the season~~.* ***shall be sequentially numbered/marked by the hunter or trapper, hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take.*** **Unit 2 –Wolf Trapping** **No limit.** **Nov. 15-Mar. 31.** *Any wolf taken in Unit 2 ~~must be sealed within 30 days of the end of the season.~~* ***shall be sequentially numbered/marked by the hunter or trapper, hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take.***
OSM Preliminary Conclusion	**Support**
OSM Conclusion	**Support with modification** to remove the seven-day reporting requirement
Southeast Alaska Subsistence Reginal Advisory Council	**Support with modification** to remove the seven-day reporting requirement
Interagency Staff Committee Comments	The Interagency Staff Committee found the staff analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and Federal Subsistence Board action on the proposal.
ADF&G Comments	**Support**
Written Public Comments	None

STAFF ANALYSIS
WP22-03

ISSUES

Wildlife Proposal WP22-03, submitted by Alaska Department of Fish and Game (ADF&G), requests that all wolves taken in Unit 2 be sequentially numbered/marked by the hunter or trapper, that hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and that all hides must be sealed within 15 days of take.

DISCUSSION

The proponent states current Federal sealing regulations no longer align with new State sealing regulations designed to gather more precise information from harvested wolves for use in ADF&G's annual Unit 2 wolf population estimates. Managing harvest of the Unit 2 wolf population to maintain the fall population within the objective range of 150-200 wolves relies on accurate and precise estimates of abundance. In 2019 when State and Federal regulations were updated to implement ADF&G's new Unit 2 wolf harvest management strategy, ADF&G neglected to consider the effect that changing the sealing requirement from within 14 days of harvest to within 30 days after the season closes would have on data used for population estimates. The purpose of this proposal is to correct that error by aligning Federal sealing regulations for wolves harvested in Unit 2 with State sealing requirements, updated by the Alaska Board of Game (BOG) at its March 18, 2021 meeting. The proponent believes this would eliminate confusion among users over which regulations apply to harvested wolves and enhance the ability of enforcement agencies to enforce regulations across land management jurisdictions.

The proponent explains that ADF&G annually estimates the number of wolves in Unit 2 using a non-invasive DNA-based spatially explicit capture-recapture method where wolf DNA is acquired when wolves roll on an array of scented hair boards throughout northern and central Prince of Wales Island. The Hydaburg Cooperative Association and US Forest Service (USFS) cooperate in this effort. For wolves detected at hair boards and subsequently harvested, harvest represents a "recapture" event that can be incorporated into population estimates. Recaptures are valuable for population estimates, particularly when users provide precise information on when and where individual wolves were harvested. The goal of this proposal is to ensure users can provide precise information for individual wolf hides at sealing. More precise data should result in more precise wolf population estimates. More precise estimates will allow managers to provide the greatest sustainable harvest opportunity while also maintaining the wolf population within the objective range.

Note: Wolves in Southeast Alaska are classified as a subspecies called the Alexander Archipelago wolf (*Canis lupus ligoni)* and will be referred to as Alexander Archipelago wolf/wolves throughout this analysis.

Existing Federal Regulation

Unit 2 –Wolf Hunting

No limit. *Sept. 1-Mar. 31.*

Any wolf taken in Unit 2 must be sealed within 30 days of the end of the season.

Unit 2 –Wolf Trapping

No limit. *Nov. 15-Mar. 31.*

Any wolf taken in Unit 2 must be sealed within 30 days of the end of the season.

Proposed Federal Regulation

Unit 2 –Wolf Hunting

No limit. *Sept. 1-Mar. 31.*

Any wolf taken in Unit 2 ~~*must be sealed within 30 days of the end of the season.*~~ ***shall be sequentially numbered/marked by the hunter or trapper, hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take.***

Unit 2 –Wolf Trapping

No limit. *Nov. 15-Mar. 31.*

Any wolf taken in Unit 2 ~~must be sealed within 30 days of the end of the season.~~ ***shall be sequentially numbered/marked by the hunter or trapper, hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take****.*

Existing State Regulation

Unit 2−Wolf Hunting	*Season*
Residents and Non-residents—5 wolves	*Dec. 1-Mar. 31*

All wolves taken in Unit 2 shall be sequentially numbered/marked by the hunter or trapper, hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take.

Unit 2−Wolf Trapping	**Season**
Residents and Non-residents—No limit.	*Nov. 15-Mar. 31*

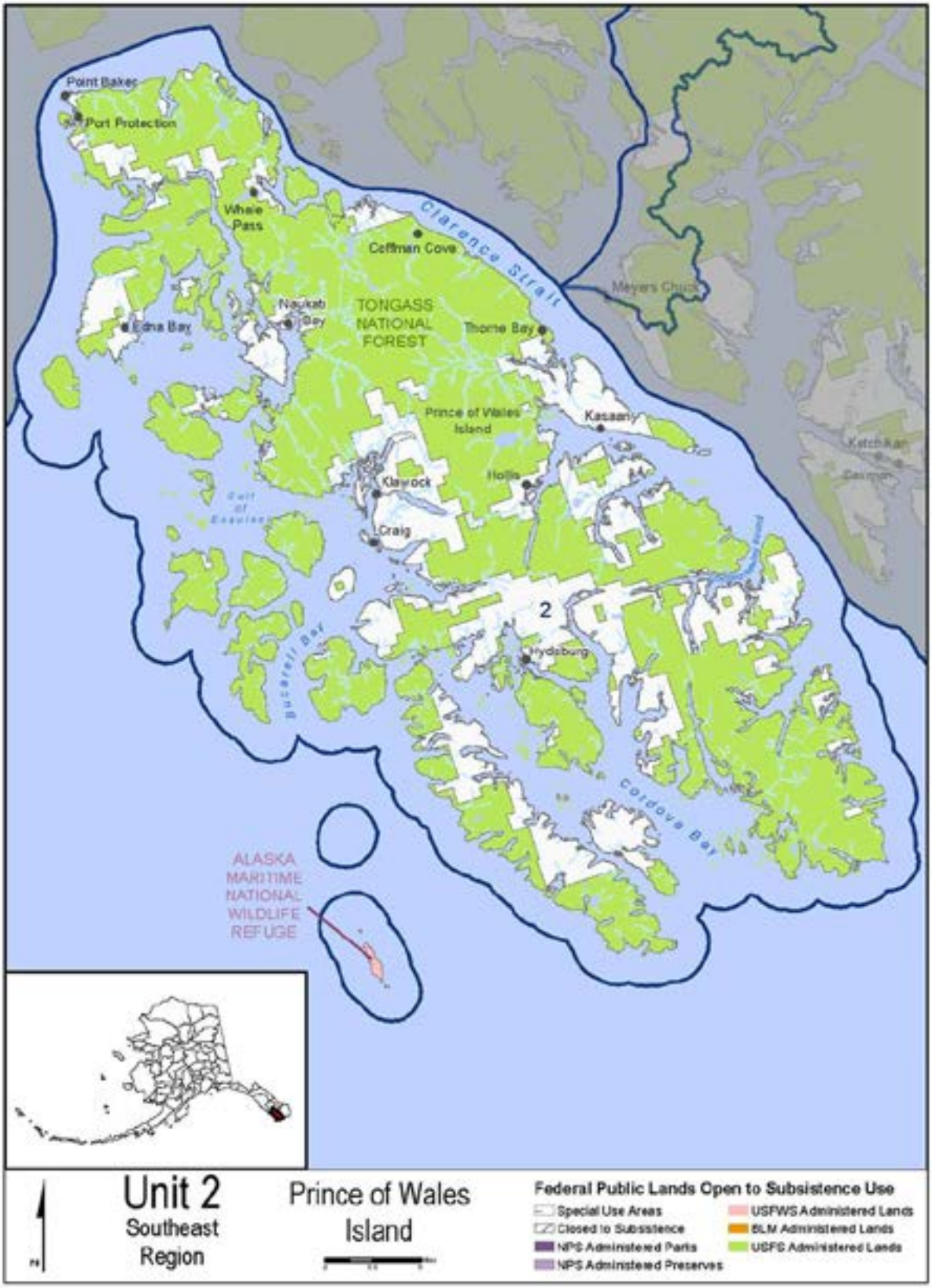
All wolves taken in Unit 2 shall be sequentially numbered/marked by the hunter or trapper, hunters and trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take.

Extent of Federal Public Lands

Unit 2 is comprised of 71.7% Federal public lands and consists of 71.6% USFS managed lands and 0.1% U.S. Fish and Wildlife Service (USFWS) managed lands (**Map 1**).

Customary and Traditional Use Determinations

The Federal Subsistence Board (Board) has not made a customary and traditional use determination (C&T) for wolves in Unit 2. Therefore, all Federally qualified subsistence users may harvest wolves in Unit 2.


Point Baker
Port Protection
Whale Pass
Coffman Cove
Clarence Strait
Meyers Chuck
Naukati Bay
Edna Bay
TONGASS NATIONAL FOREST
Thorne Bay
Prince of Wales Island
Kasaan
Ketchikan
Saxman
Klawock
Hollis
Craig
Gulf of Esquinas
2
Hydaburg
Bucareli Bay
Cordova Bay
ALASKA MARITIME NATIONAL WILDLIFE REFUGE
Unit 2
Southeast Region
Prince of Wales Island
Federal Public Lands Open to Subsistence Use
Special Use Areas
Closed to Subsistence
NPS Administered Parks
NPS Administered Preserves
USFWS Administered Lands
BLM Administered Lands
USFS Administered Lands

Map 1. Unit 2

Regulatory History

From 1915 through the early 1970s, the government paid a cash bounty for wolves in Southeast Alaska and, during the 1950s, the Federal government poisoned wolves in the region to increase deer numbers (Porter 2018). Following the discontinuance of the wolf bounty program, wolf hunting and trapping regulations in Unit 2 remained the same until 1992 (Larsen 1994).

In 1990, Federal hunting and trapping regulations were adopted from State regulations. State and Federal trapping seasons were Nov. 10-Apr. 30 with no harvest limits, and State and Federal hunting seasons were year-round with no harvest limits.

Also in 1990, an interagency committee sponsored by the USFS expressed concern about the viability of wolves in Southeast Alaska due to extensive timber harvesting on the Tongass National Forest (Porter 2018).

In 1992, the BOG restricted the State hunting season to Aug. 1-Apr. 30 and decreased the harvest limit to 5 wolves. The State hunting season has not changed since, and the State trapping season remained the same until 2019.

In 1993, the Biodiversity Legal Foundation and an independent biologist from Haines, Alaska, petitioned the USFWS to list the Alexander Archipelago wolf as a threatened subspecies pursuant to the Endangered Species Act (ESA) (Porter 2018).

In 1994, the Board adopted Proposal P94-02 to align the Federal wolf hunting season and harvest limit with the State hunting season (Aug. 1-Apr. 30 with a 5 wolf harvest limit).

In 1995 and 1997, the USFWS responded to the 1993 petition, finding the listing not to be warranted because the Alexander Archipelago wolf population appeared to be stable and because of a 1997 Tongass National Forest Management Plan, which identified a system of old-growth forest reserves geared toward conserving deer (primary prey of wolves) and, by extension, wolves (USFWS 1995, 2016, Porter 2003).

In 1997, the BOG implemented an annual Harvest Guideline Level (HGL) of 25% of the estimated Unit 2 fall wolf population (Table 1). The BOG established this maximum harvest level in response to a record and possibly unsustainable wolf harvest of 132 wolves in 1996 (Porter 2018). As the estimated wolf population was 360, the harvest quota was 90 wolves (see Biological Background section for sustainable harvest rates). The BOG also shortened the State hunting and trapping seasons to Dec. 1-Mar. 31 and required sealing within 30 days of harvest (Person and Logan 2012, Porter 2003).

Also, in 1997, the Board adopted Proposal P97-08 to align Federal wolf hunting and trapping seasons and sealing requirements with the new State regulations. The Board also required that wolves must have the radius and ulna of the left foreleg naturally attached to the hide until sealing. Foreleg bone measurements are used as a proxy for wolf ages (pup, yearling, adult), providing population age structure and recruitment information.

In 1999, ADF&G closed the wolf season a month early (on February 29, 1999) because the HGL was predicted to be reached before the normal closing date (Person and Logan 2012, Bethune 2012, Porter 2003). Several new trappers worked Unit 2 in 1999 with good success, whereas historically only 3-4 trappers took more than 10 wolves each (Porter 2003).

In 2000, the BOG increased the HGL to 30% based on analyses indicating Unit 2 wolves experience low natural mortality (Porter 2018). The assumed wolf population was adjusted to 300 wolves, so the quota remained 90 wolves (Porter 2018).

In 2001, the Board adopted Proposal WP01-05 to shift both the hunting and trapping seasons from Dec. 1- Mar. 31 to Nov. 15- Mar. 15. The intent was to provide better access when less snow is on the ground and to coincide seasons with when wolf pelts are the most prime.

In 2003, the Board adopted Proposal WP03-10 with modification to extend the wolf hunting season from Nov. 15-Mar. 15 to Sep. 1-Mar. 31 to provide additional subsistence harvest opportunity, particularly during the fall deer hunting season and because wolf pelts prime early in Unit 2 (OSM 2003). The Board also delegated authority to the Craig and Thorne Bay District Rangers to close the Federal hunting and trapping season in consultation with ADF&G and the Chair of the Southeast Alaska Subsistence Regional Advisory Council (Council) when the combined Federal-State harvest quota is reached.

In 2007, the Board adopted Proposal WP07-15 with modification to change the closing date of the trapping season from March 15 to March 31 to provide more subsistence opportunity and to align the closing dates of State and Federal hunting and trapping seasons. The modification eliminated the requirement of leaving the radius and ulna of the left foreleg naturally attached to the hide until sealing.

In 2010, the ADF&G reduced the harvest quota to 60 wolves in response to a perceived decline in the wolf population (Porter 2018).

In 2011, the BOG changed the sealing requirement from 30 days to 14 days after harvest to help managers make quicker in-season management decisions (Bethune 2012).

Also in 2011, the Center for Biological Diversity and Greenpeace filed a second petition to list the Alexander Archipelago wolf as a threatened or endangered species under the ESA, including a request to consider Unit 2 wolves as a distinct population segment (DPS) (Porter 2018, Toppenberg et al. 2015).

In 2012, the Board adopted Proposal WP12-19 to change Federal sealing requirements to 14 days after harvest, aligning with State regulations. The Board shortened the sealing requirement to allow more efficient tracking of harvest to avoid exceeding harvest quotas.

From 2013-2018, ADF&G closed the Unit 2 wolf season early by emergency order because harvest quotas were expected to be met (Table 1). In 2014, ADF&G further reduced the harvest quota to 25 wolves based on recent population estimates (Porter 2018).

In 2015, the BOG revised the HGL to 20% in response to decreased population estimates and high estimates of unreported mortality (Porter 2018). As an additional conservation measure to account for unreported harvests and to address concerns about a declining population and potential listing under the ESA, State and Federal managers reduced the harvest quota by 50% (10% HGL) in 2015 and 2016 (Table 1) (SERAC 2017).

Also, in 2015, the Board rejected Special Action Request WSA15-13 to close the Federal wolf hunting and trapping seasons for the 2015/16 regulatory year to all users. The Board determined the closure was not warranted for either conservation concerns or continuation of subsistence uses, noting that ADF&G and the USFS had established a very conservative harvest quota for the year.

In January 2016, the USFWS issued another "not warranted" finding in response to the 2011 ESA petition as the Alexander Archipelago wolf appeared stable and viable across most of its range (USFWS 2016, Porter 2018). Additionally, the USFWS determined that Unit 2 wolves did not meet the criteria for a DPS designation (persisting in a unique ecological setting, marked genetic differences, comprising a significant portion of the range) (USFWS 2016, Porter 2018).

In 2018, the Board rejected WP18-04 to increase the HGL to 30% under Federal regulations. The Council had submitted the proposal because it believed previous quotas were too conservative and did not accurately reflect the Unit 2 wolf population. The Board rejected the proposal due to conservation concerns over unsustainable harvests as well as concerns about the difficulty of State and Federal managers implementing separate quotas, which would also create confusion among users (FSB 2018). However, the Board expressed desire for the USFS and ADF&G to work together to find a sustainable solution to the Unit 2 wolf issue (FSB 2018).

In October 2018, the Board issued a new delegation of authority letter to the in-season managers of Unit 2 wolves. The new letter stated that the in-season managers could close, reopen, or adjust the Federal hunting and trapping season for wolves in Unit 2. Coordination with ADF&G, OSM, and the Council Chair is required.

In 2018, the BOG received three proposals for Unit 2 wolves for the 2018/19 regulatory cycle (effective July 1, 2019). The Council submitted Proposal 42 to increase the HGL to 30%. ADF&G submitted Proposal 43 to change the harvest management strategy from using HGLs to meeting specified population objectives. Proposal 43 also proposed changing the sealing requirement for the State trapping season to 30 days after the close of the season as the new management strategy would not depend on in-season harvest management (ADF&G 2019d). The Craig Fish and Game Advisory Committee (Craig AC) submitted Proposal 44 to change the opening date of the wolf trapping season from Dec. 1 to Nov. 15, which would align with the Federal trapping season opening date. The Council and ADF&G had identified the need for population objectives for Unit 2 wolves to clarify and direct management and that population objectives should be set through a transparent, public process (Porter 2018, SERAC 2017). The Council withdrew Proposal 42 in support of Proposal 43.

In January 2019, the BOG adopted Proposal 43 as amended, which had overwhelming support from five Advisory Committees and the public (SERAC 2019, ADF&G 2019d). The BOG established the population objective range for Unit 2 wolves as 150-200 wolves (see Biological Background section) (ADF&G 2019a). The BOG also adopted Proposal 44, extending the State trapping season to align with the Federal season.

In 2019, the Council submitted Wildlife Special Action Request WSA19-02 to extend the sealing period for wolf hunting and trapping and to remove language referencing a combined Federal-State harvest quota for wolves in Unit 2 for the 2019/20 regulatory year. In August 2019, the Board approved WSA19-02, stating that the new management strategy should help ensure a sustainable population and encourage better harvest reporting. The Board also stated that announcing predetermined season lengths provides predictability to users and renders the in-season sealing requirement unnecessary (ADF&G 2019f).

In late October 2019, ADF&G and the USFS announced that 2019/20 State and Federal hunting and trapping seasons for wolves in Unit 2 would close on January 15, 2020, resulting in a two month trapping season based on the unit-wide population estimate of 170 wolves. Under the new harvest management

strategy, when the most current population estimate is within the objective range of 150-200 wolves, the trapping season may be up to two months long (see Biological Background for more information on the new harvest management strategy) (ADF&G and USFS 2019).

In April 2020, the Board adopted Proposal WP20-16/17. WP20-16 requested extending the sealing period for wolf trapping in Unit 2 from within "14 days of harvest" to "within 30 days of the end of the season" and removing language referencing a combined Federal-State harvest quota. WP20-17 requested the same sealing period extension and removal of harvest quotas for wolf hunting in Unit 2, as well as increasing the hunting harvest limit from "5 wolves" to "no limit". The proposed changes mirrored the requests of WSA19-02 with the exception of changing the hunting harvest limit to "no limit." The Board adopted these proposals to facilitate management of the wolf population and reduce regulatory complexity by aligning Federal and State regulations, noting that the majority of wolves harvested in Unit 2 are taken on State-managed lands. The Board also stated that extending the sealing requirement reduced the regulatory burden on Federally qualified subsistence users. Proposals WP20-16/17 were also supported by the Council, ADF&G, and the Interagency Staff Committee (FSB 2020).

Also, in 2020, Emergency Wildlife Special Action WSA20-08 submitted by Alaskans for Wildlife requested delaying the opening date of the wolf hunting season in Unit 2 from September 1 to November 1. This was intended to allow time for the 2019 population estimate to become available. The new harvest management strategy adopted by the Board and the BOG relies on population estimates to set season lengths. ADF&G reported delays in lab analysis of the DNA samples due to the COVID-19 pandemic and did not expect the population estimates before mid-to-late September. Lack of a population estimate required a cautious approach to wolf management given the high reported wolf harvest in 2019. The Federal in-season manager used their delegated authority to announce the delayed opening date of October 31 to allow time for the population estimate to become available. Population data were released on October 26, 2020, estimating 316 wolves. Harvest effort during fall 2019 was much higher than anticipated (165 wolves) and resulted in an unsustainable level of harvest (>50%). After a public hearing on October 29, 2020, managers limited State and Federal wolf trapping seasons in Unit 2, closing all seasons on December 5, 2020. Federally qualified users had 36 days of hunting and 21 days of trapping opportunity for wolves in Unit 2 for the 2020 season (ADF&G and USFS. 2020a, ADF&G and USFS. 2020b).

In March 2021, the BOG adopted Proposal 194 as amended, requiring all wolves taken in Unit 2 to be sequentially numbered/marked by the hunter or trapper. In addition, it required hunters and trappers to call the ADF&G within seven days of take to report the date and location of take for each wolf, and that all hides must be sealed within 15 days of take. ADF&G brought Proposal 194 before the BOG to correct an unforeseen consequence of a 2019 change in regulation. The reduction in reporting and sealing time would allow for more precise information to improve population estimates. The Southeast Alaska Subsistence Reginal Advisory Council (Council) opposed Proposal 194 as it was presented especially if it was implemented in a shortened wolf season. Proposal 194 required wolves to be sealed within seven days of harvest. The Council expressed concerns that a seven day after harvest sealing requirement could affect a trapper's ability to trap efficiently while meeting weekly sealing requirements. The Council stated they would support a sealing requirement of seven days after the end of the season and a companion Federal proposal should be submitted. Proposal 194 was amended twice. The amendments changed the sealing requirement from seven days after harvest to 15 days after harvest and added the requirement to call ADF&G within seven days of harvest to report the date and location of the wolf harvest. Additionally,

the amendments also required hunters and trappers to sequentially number/mark the hides (ADF&G 2021).

In November 2021, ADF&G and USFS announced a 31 day wolf trapping season under State and Federal regulations from Nov. 15-Dec. 15, 2021 based on the most recent population estimate of 386 wolves (ADF&G and USFS, 2021, Schumacher 2021, pers. comm).

Table 1. Management data for Unit 2 wolves using the Harvest Guideline Level (HGL) management strategy (Schumacher 2019, pers. comm. as cited in OSM 2020, ADF&G and USFS 2019, Schumacher 2021, pers. comm, ADF&G 2022).

Regulatory Year	Population Estimate*	Harvest Guideline level (HGL %)	Harvest Quota	Reported Harvest	Date closed by State Emergency Order
1996				132	
1997	360	25	90	78	
1998	360	25	90	91	
1999	360	25	90	96	Feb. 29
2000	300	30	90	73	
2001	300	30	90	62	
2002	300	30	90	64	
2003	300	30	90	33	
2004	300	30	90	77	
2005	300	30	90	60	
2006	300	30	90	38	
2007	300	30	90	36	
2008	300	30	90	24	
2009	300	30	90	22	
2010	200	30	60	28	
2011	200	30	60	28	
2012	200	30	60	52	
2013	200	30	60	57	Mar. 19
2014	221	30	25	29	Feb. 22
2015	89	20	9	7	Dec. 20
2016	108	20	11	29	Dec. 21
2017	231	20	46	61	Dec. 16
2018	225	20	45	44	Dec. 18/21**
2019	170	n/a	n/a	165	Jan. 15***
2020	316	n/a	n/a	68	Dec. 5****
2021	386	n/a	n/a	64	Dec. 15

* Population estimates from 1997-2013 were assumed estimates based on harvest levels and a 1994 population estimate. Population estimates from 2014-2020 are from DNA-based spatially explicit capture-recapture studies, and reflect the estimate used to determine that years quota/season length (see Biological Background section).

** Season closed by Emergency Order on Dec. 18 but reopened to Dec. 21 because bad weather prevented trappers from recovering gear.

***Season closing date announced according to the new harvest management strategy.

****Federal hunting season was closed September 1 and reopened on October 31 to allow time to acquire the 2019 population estimate (ADF&G and USFS. 2020b).

Current Events Involving the Species

In July 2020, the Center for Biological Diversity, Alaska Rainforest Defenders, and Defenders of Wildlife submitted a petition to the U.S. Department of the Interior to list the Alexander Archipelago wolf in Southeast Alaska as threatened or endangered under the ESA (Wolf et al. 2020).

On July 27, 2021, the USFWS announced in a 90-day finding that the petition to list the Alexander Archipelago wolf presented substantial information, including illegal and legal trapping and hunting, indicating that the petitioned action may be warranted. Therefore, the USFWS will initiate a status review to determine whether the petitioned action is warranted.

Biological Background

Unit 2 wolves are part of the Alexander Archipelago wolf subspecies, which ranges from coastal British Colombia north to Yakutat, Alaska, and includes the islands in Southeast Alaska, excluding Unit 4 (USFWS 2015). Alexander Archipelago wolves tend to be smaller with shorter hair than continental wolves and can be genetically differentiated (USFWS 2015, Porter 2018). Because of the relatively high density of prey available, the islands of Unit 2 have long been assumed to support the highest densities of wolves in Alaska (Porter 2018). Using the best available data and modeling, USFWS (2015, 2016) estimated that the 2013 and 2014 Unit 2 wolf population comprised 13% (130-378 wolves) and 6% (50-159 wolves) of the total Alexander Archipelago wolf population (865-2,687 wolves), respectively. Indeed, USFWS (2015) notes that even the low, 2014 wolf density estimates for Unit 2 (9.9 wolves/1,000 km2) are not particularly low by most standards for Northern wolf populations (Fuller et al. 2003).

State management objectives for Unit 2 wolves include:

- Manage harvest to meet a population objective of 150-200 wolves.

From 1997, when the HGL management strategy was implemented, through 2013, Unit 2 wolf abundance was uncertain. Managers based decisions (e.g. harvest quotas) on assumed population levels, sealing records, and a 1994 population estimate (SERAC 2019, ADF&G 2019b, Porter 2003). Person and Ingle (1995) used a simulation model using radio-collared wolf data collected for a graduate research project estimated that 321 wolves and 199 wolves inhabited Unit 2 in fall 1994 and spring 1995, respectively (Porter 2003). The smaller spring estimate reflects overwinter mortality, primarily from trapping (Porter 2003). Between 1998 and 2002, Porter (2003) assumed the Unit 2 wolf population had remained relatively abundant because of consistently high harvests, which provided a population index.

Several methods have been used to improve the accuracy of wolf populations estimates. Since 2013, ADF&G in cooperation with the USFS, the Hydaburg Cooperative Association, and The Nature Conservancy have employed a DNA-based spatially explicit capture-recapture (SECR) method to estimate Unit 2 wolf abundance (SERAC 2019, ADF&G 2019b). This method has been found to be the most robust and least biased method of estimating wolf populations in forested habitats (Roffler et al. 2016). The study uses hair boards equipped with scent lure to attract wolves and barbed wire to obtain hair samples that are sent to a lab for DNA analysis. Samples are collected from mid-October through

December and lab results are usually available in late July (SERAC 2019, ADF&G 2015). Thus, harvest management decisions are made with last year's wolf population estimate. While these surveys and population estimates are currently conducted annually, they are expensive and labor intensive. Therefore, ADF&G will likely transition to conducting population estimates every 2-3 years in the future (ADF&G 2019d).

Recent population estimates suggest that the Unit 2 population has been growing. Between 2013 and 2021, Unit 2 wolf population estimates have ranged from 89-386 wolves (Table 1, Figure 1) (Schumacher 2019, pers. comm. as cited in OSM 2020, ADF&G, and USFS. 2020a). While the point estimates for the first two years differ drastically, statistically, no difference exists between the two estimates due to overlapping confidence intervals (C.I.). As the study progressed, more hair boards were deployed, more wolves were recaptured in subsequent years, and staff became more skilled at handling samples, resulting in tighter 95% confidence intervals. The wolf population estimate increased significantly between 2016 and 2017 (ADF&G and USFS 2020a). The most recent 2021 estimate was 386 wolves, with a 95% C.I. of 320-472 wolves (Schumacher 2021, pers. comm). In addition to SECR population estimates, local hunters and trappers have expressed seeing many more wolves in recent years (SERAC 2017, 2018).

Carroll et al. (2014) considered wolf populations <150-200 individuals as small, and USFWS (2015) notes that most minimum viable population estimates for gray wolves range between 100 and 150 wolves. However, despite the comparatively small size and insularity of the Unit 2 wolf population, inbreeding probably is not affecting it (Breed 2007, USFWS 2015).

Humans cause the majority of wolf mortality in Unit 2. Natural causes account for only 4% of the annual mortality of the Unit 2 wolf population, while human-caused mortality accounts for the remainder (Person and Russell 2008, Wolf Technical Committee 2017). Person and Russell (2008) studied 55 radio-collared wolves in Unit 2 from 1993-2004: 39 wolves (71%) were killed by humans, while only 5 (9%) died from natural causes. Similarly, ADF&G collared an additional 12 wolves from 2012-2015, and 8 (67%) were killed by humans, while only 1 (8%) died from natural causes (USFWS 2015). However, these studies took place in portions of Unit 2 where road access was greater, likely resulting in higher harvest. Therefore, human-caused mortality rates may be potentially inflated (USFWS 2015).

While wolves are generally resilient to high levels of harvest and human activity (USFWS 2015, Weaver et al. 1996), over-exploitation can still be a risk. Wolves usually buffer human predation with their high potential annual productivity and long dispersal abilities. If sufficient prey is available, wolves can rapidly repopulate areas depleted by hunting and trapping (USFWS 2015, Ballard et al. 1987). However, due to differences in wolf population characteristics (e.g. sex/age structure), a universal, sustainable human-caused mortality rate does not exist, and the Unit 2 wolf population may be particularly vulnerable to overexploitation due to its insularity and lack of immigration (USFWS 2015, Wolf Technical Committee 2017). Person and Russell (2008) reported that a >38% total annual mortality rate for Unit 2 wolves was likely unsustainable based on past harvest rates and population estimates. The ADF&G Regional Wildlife Supervisor for Southeast Alaska stated that other wolf research and the scientific literature indicate that a healthy wolf population can sustain 30% annual mortality (SERAC 2017). Additionally, wolf harvest records indicate neither offering a cash bounty nor poisoning wolves during the early 20th century had any lasting effects on wolf abundance or distribution on Southeast Alaska islands (Porter 2018).

Alexander Archipelago wolves start breeding at 22-34 months of age, and litter sizes range from 1-8 pups, averaging 4.1 pups (USFWS 2015, Person et al. 1996, Person and Russell 2009). Person and

Russell (2008) reported survival rates for Unit 2 wolves > 4 months of age as 0.54 between 1993 and 2004 (USFWS 2015). Den use occurs from mid-April through early-July, after which pups are relocated to rendezvous sites usually <1 km from their den where they remain until October (USFWS 2015, Person and Russell 2009). Pack sizes on Prince of Wales Island (POW) average 7.6 wolves in the fall and 4.0 wolves in the spring, and home range sizes average 535 km2, which is a quarter of the size estimated for wolves on the northern mainland of southeastern Alaska (ADF&G 2015d as cited in USFWS 2015).

New Harvest Management Strategy

Unit 2 is a good place to implement population objectives because there is very little dispersal into and out of the unit (ADF&G 2019d). The new wolf management strategy consists of four management zones (Figure 2). Zone 1 sets the minimum wolf population threshold at 100 wolves and seasons remain closed until the wolf population recovers. Zone 2 is the conservation zone, where the wolf population is estimated between 100-149 wolves, with seasons of up to six weeks to provide limited harvest opportunity and a buffer to recover the population before it declines into Zone 1. In Zone 3, the population objective range is 150-200 wolves. This is the desirable zone, and harvest would occur during seasons of up to eight weeks. When the population is in Zone 3, SECR population estimates would only be conducted every 2-4 years. Zone 4 is the over-objective zone where wolf numbers exceed 200, and seasons of up to 4 months are geared toward population reduction (ADF&G 2019b). An issue with this new strategy is the one-year time lag in obtaining population estimates. For example, if the wolf population is in Zone 1, an additional trapping season would occur before managers learned this (ADF&G 2019b, 2019c). However, the HGL management strategy also announced harvest quotas based on population estimates that were at least one year old and, prior to 2014, were assumed estimates (Figure 1). State and Federal managers will announce season lengths annually before November 15, the opening date for Federal and State trapping seasons (OSM 2020).

Setting these population objectives incorporates biological as well as social concerns as various user groups have strong and differing opinions about wolves in Unit 2 (e.g. subsistence deer hunters view wolves as competitors, ESA petitioners view wolves as threatened) (SERAC 2017, 2018, Wolf Technical Committee 2017, ADF&G 2019d). The population objectives also included traditional knowledge. The Craig Tribal Association testified that the USFS determined 150-200 wolves to be a sustainable range after talking with local and traditional knowledge holders on POW (SERAC 2017). Similarly, a working group of the Council also thought the population objective range should be 150-200 wolves, which is the range the BOG adopted (SERAC 2017).

Stressors

Unit 2 wolves experience numerous stressors, including harvest, logging, road development, and climate-related events (USFWS 2015, Porter 2018). In their comprehensive status assessment for the Alexander Archipelago wolf, the USFWS (2015) determined the Unit 2 wolf population had low resiliency due to high rates of unreported harvest, high rates of timber harvest with detrimental effects on deer, high insularity (little immigration or emigration), and high levels of boat and road access for hunters and trappers.

The presence of wolves in an area is closely linked with prey availability (USFWS 2015). While Unit 2 wolves feed on a variety of species including beavers and salmon, deer are their primary prey (USFWS 2015, Porter 2018). Both the comprehensive conservation assessment (Person et al. 1996) and the species status assessment (USFWS 2015) prepared in response to the 1993 and 2011 ESA listing petitions, respectively, identified maintaining deer populations as a primary conservation measure for Alexander

Archipelago wolves (Porter 2018). Wolf abundance may be especially linked to deer abundance and availability in Unit 2 where other ungulate prey species (e.g. moose, elk, caribou) are not present (USFWS 2015).

Deer are primarily limited by habitat rather than by predation (SERAC 2017, USFWS 2015). In Unit 2, deer habitat is adversely affected by industrial-scale logging of old-growth forests, which has occurred in the unit since the 1950s and peaked in the 1980s (USFWS 2015). Clear-cut logging has been the primary timber harvesting method and, as of 2015, 23% of forests in Unit 2 were logged (Shanley 2015 as cited in USFWS 2015). Albert and Schoen (2007) modeled deer habitat capability in Unit 2 for two time periods (1954 and 2002), determining it to have lost 38% and 11% of its habitat value in northern and southern POW, respectively (USFWS 2015). USFWS (2015, 2016) predict that past timber harvest in Unit 2 will result in 21-33% declines in the deer population and 8-14% declines in the wolf population over the next 30 years, with future timber harvest exacerbating these declines. However, in 2014 (most recent information available), the Unit 2 deer population appeared to be stable to slowly increasing (Bethune 2015). USFWS (2016) states the rate of future timber harvest is difficult to project.

Declines in understory vegetation correspond with decreased deer carrying capacity (USFWS 2015). Severe (deep snow) winters often result in deer population declines (e.g. Brinkman et al. 2011), and these effects are exacerbated by loss of old-growth forests. Old-growth forests have multi-layered canopies that intercept snow and moderate temperature and wind, providing shelter for and facilitating movements of deer in the winter (USFWS 2015, Porter 2018). They also maintain diverse understories that provide continuous forage for deer (USFWS 2015). Conversely, clear-cuts may temporarily provide deer with winter forage, but this forage can be buried during winters with deep snow (Porter 2018). The initial flush of forbs and shrubs in clear-cuts provide deer with lower-quality forage, and regenerating trees shade out the understory vegetation after 20-35 years (Porter 2018, USFWS 2015). Since Unit 2 timber harvest peaked in the 1980s, many stands are entering the successional stage that is very poor deer habitat (USFWS 2015).

In addition to altering the habitat of their primary prey species, logging also impacts Unit 2 wolves by constructing roads that provide relatively easy access for hunters and trappers into previously remote areas (Porter 2018, USFWS 2015). Person and Russell (2008) found roads clearly increased risk of death for POW wolves from hunting and trapping and contributed to unsustainable harvest rates. They also determined road density to be an important predictor of harvest up to 0.9 km of road per square kilometer (km/km2). Above this threshold, increased road density did not correspond to increased harvest rates. Mean road density in Unit 2 is 0.62 km/km2, ranging from 0-1.57 km/km2 (Albert 2015 as cited in USFWS 2015). Person and Logan (2012) believed harvest from the densely roaded northcentral and central portions of POW were frequently unsustainable. The USFS aims to shift timber harvest to regenerating stands and away from old-growth stands, which also allows for the use of existing roads as opposed to constructing new ones (USFWS 2015, 2016).

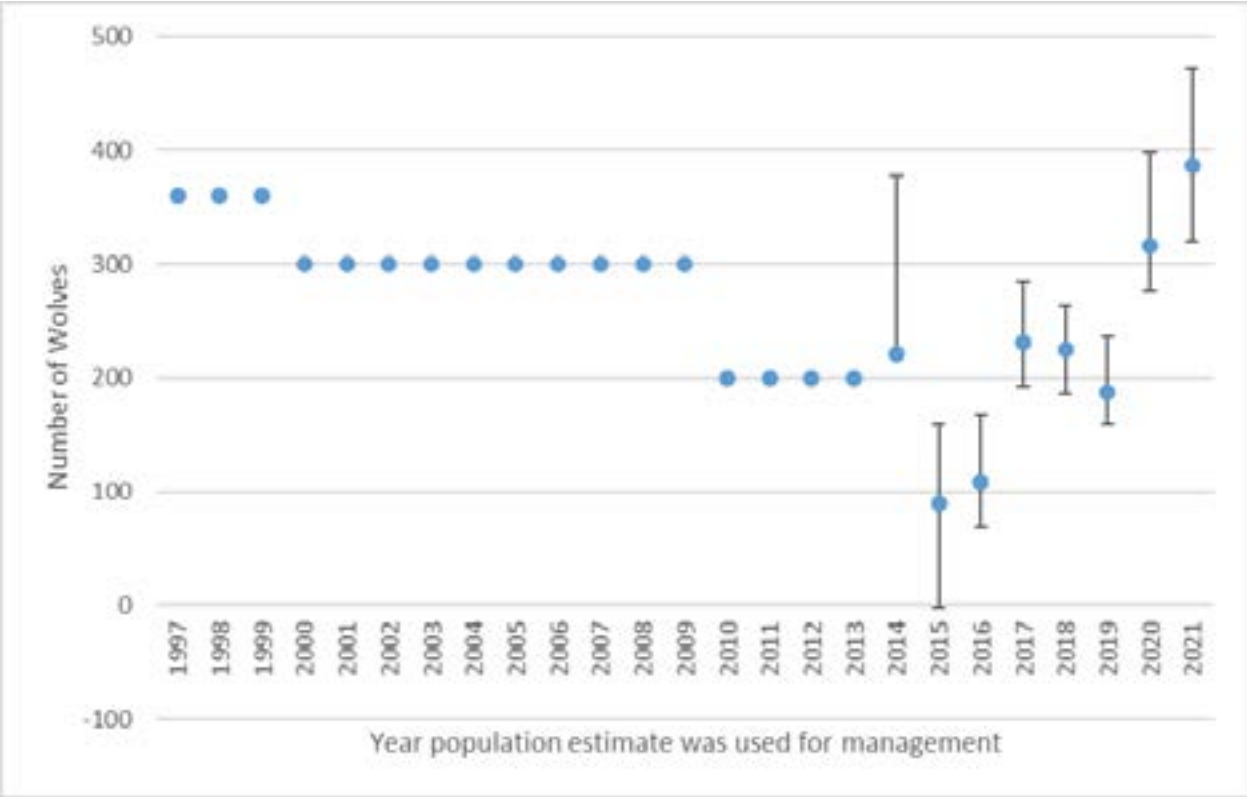


Figure 1. Unit 2 wolf population estimates, 1997-2021. Estimates from 1997-2013 are assumed from sealing records and a 1994 population estimate. Estimates from 2014-2021 are from a DNA mark/recapture study. The error bars represent 95% confidence intervals. Estimates take a year to determine; thus the population estimate for 2014 was used to set 2015 harvest quotas. The population estimates in this graph reflect the one year time lag (e.g. the 2015 population estimate actually reflects wolf numbers during fall 2014, but was used to set harvest quotas for the 2015 season) (Schumacher 2019, pers. comm. as cited in OSM 2020, ADF&G 2020b, ADF&G and USFS 2019, ADF&G and USFS. 2020a, Schumacher 2021, pers. comm).

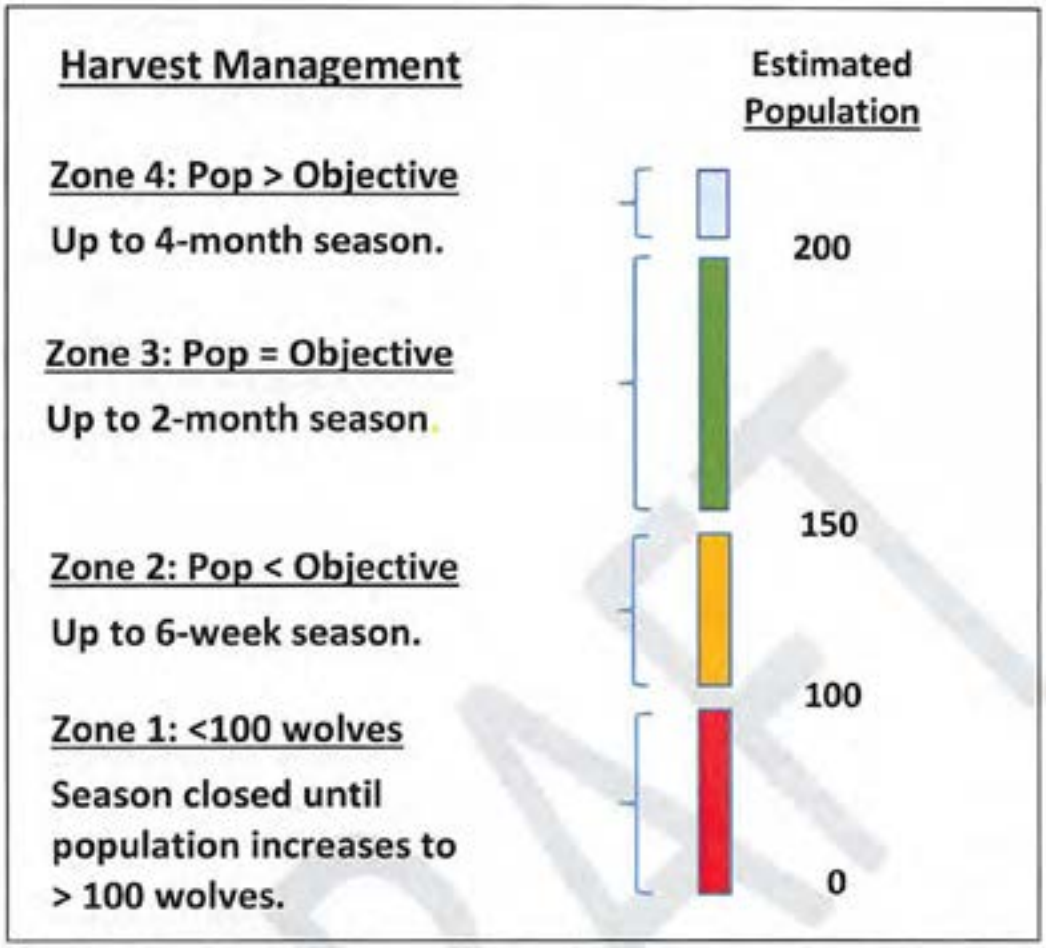


Figure 2. Population thresholds and harvest management strategies for the Unit 2 wolf population. The BOG adopted population objectives of 150-200 wolves in 2019 (figure from ADF&G 2019b).

Cultural Knowledge and Traditional Practices

Wolves have had significant economic and cultural importance throughout Southeast Alaska. Wolves were traditionally harvested for furs and hides throughout their range in Southeast Alaska (ADF&G 2008). Historically the fur of this species was used in making ceremonial masks, blankets, robes, and other articles of clothing (ADF&G 2008). The furs and hides were traded between communities and with other regions of the state (De Laguna 1972, Oberg 1973, Petroff 1884).

Traditionally, wolves were harvested in the late fall and early winter because the fur was considered prime during these seasons and there was no deep snow to restrict travel (ADF&G 2008). Trapping usually started in November and continued through December, and was accomplished with snares and deadfalls set across game trails frequented by wolves (ADF&G 2003, ADF&G 2008, De Laguna 1972, Goldschmidt and Haas n.d. [1946], Goldschmidt and Haas 1998, Oberg 1973). Families built and maintained trapping cabins in remote areas exhibiting high furbearer abundance and placed them in accordance with clan ownership rights (Goldschmidt and Haas 1998). Harvest areas were traditionally owned by clans that were inherited through family lineages (ADF&G 2008).

Wolves also occupy important symbolic roles, particularly with both Tlingit and Haida communities. Tlingit society is divided into two moieties, which include the Raven and Eagle/Wolf (Emmons 1991). Within the moieties, several clans claim wolves as symbols or crests (Swanton 1909). Members of wolf clans ceremonially address wolves as relatives and believe the animals embody their ancestors (ADF&G 2008). Haida people believed in similar relationships between wolves and people. In Haida practices, however, the wolf is claimed by the Raven rather than the Eagle moiety (Blackman 1998).

The wolf's mythical and symbolic nature within Tlingit culture resulted in great care and respect being shown to both the living and harvested members of this species (ADF&G 2008). Wolves were not normally eaten, except as a famine food (ADF&G 2008).

Preparation of animal skins was traditionally assigned to women in both Tlingit and Haida cultural groups (Blackman 1998, Emmons 1991). The order of value among available furs within the Tlingit culture was sea otter, marten, beaver, river otter, black fox, mink, wolverine, wolf, and bear (Oberg 1973). Wolves contemporarily retain cultural value, and wolf harvest, sharing, and use have been recently documented in many areas of Southeast Alaska (ADF&G 2008). Wolf fur continues to be used in Native handicrafts such as blankets, ceremonial robes, winter coat ruffs, and art, but are also sold to commercial fur traders (ADF&G 2008).

Though wolves traditionally and contemporarily play important cultural and economic roles within Southeast Alaska, wolves are also now seen as a direct competitor for an important subsistence food source in Unit 2 – deer (Wolf Technical Committee 2017). Wolves also present other considerations for area residents including their role in both consumptive and non-consumptive tourism, as a top predator within the ecological system, and as a potential threat to humans and pets. It is believed that improving forage production within young-growth stands that are near areas preferred for human hunting of deer will help to alleviate some of the human-wolf-deer tensions in Unit 2 (Wolf Technical Committee 2017).

Harvest History

From the 1950s through the mid-1990s, wolf harvest in Unit 2 increased in conjunction with a growing human population and increased road access associated with the logging industry, peaking at 132 wolves in 1996 (Figure 3) (Porter 2018). Since 1996, trapper numbers in Unit 2 have generally been declining, possibly due to an aging trapper pool and a human population that is decreasing in response to fewer timber-related jobs (Bethune 2012). Between 1997 and 2018, total trapper numbers in Unit 2 ranged from 4-26 trappers per year, averaging 14.5 trappers per year (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018). Over the same time period, trappers living in Unit 2 accounted for 60-100% of the annual Unit 2 wolf harvest, averaging 89% (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018). Most of the non-local resident harvest is by residents of adjacent communities, including Ketchikan, Petersburg, Wrangell, and Sitka (Schumacher 2019, pers. comm. as cited in OSM 2020). In 2019, total trapper numbers in Unit 2 increased substantially, with 32 trappers sealing wolves from Unit 2 (ADF&G 2020a). (Note: As there is no customary and traditional use determination for wolves in Unit 2, all rural residents are Federally qualified subsistence users. Ketchikan and Juneau are the only non-rural communities in Southeast Alaska).

Between 1997 and 2018, average catch ranged from 1.8-5.5 wolves per trapper, averaging 3.4 wolves per trapper (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, Porter 2003). However, in most years, just 2-3 skilled trappers harvest most of the wolves (Schumacher 2019, pers. comm. as

cited in OSM 2020). Between 1996 and 1998, ADF&G conducted household harvest surveys in all POW communities (ADF&G 2019e). The communities of Klawock and Craig accounted for 80% of the POW wolf harvest, and <.05% of POW residents attempted to harvest wolves (ADF&G 2019e).

Unit 2 wolf harvest is primarily monitored through mandatory sealing of pelts (Porter 2018). Harvest primarily occurs on non-Federal lands, including tide lands (ADF&G 2019d, SERAC 2017, Person and Logan 2012). Most wolves are harvested under a combination hunting/trapping license (Schumacher 2019, pers. comm. as cited in OSM 2020). The only wolves known to be taken under a hunting license are harvested from Sept. 1-Nov. 14 during the Federal hunting season, but before State and Federal trapping seasons open (Schumacher 2019, pers. comm. as cited in OSM 2020). In Unit 2, wolves can be harvested with a firearm under a trapping license under both State and Federal regulations.

Between 1997, when the HGL was initiated (see Regulatory History), and 2018, annual reported wolf harvest has ranged from 7-96 wolves, averaging 50 wolves (Figure 3) (Schumacher 2019, pers. comm. as cited in OSM 2020). The annual harvest quota has been exceeded five times (Table 1). Most wolves are harvested using traps and relatively few are shot. Between 1997 and 2018, 21%, 53%, and 25% of harvested wolves were shot, trapped, and snared, respectively (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, Bethune 2012). In 2019, the first year under the new harvest management strategy without any quotas, the reported wolf harvest was 165 wolves, which is the highest number ever recorded in Unit 2 (ADF&G 2020a). ADF&G (2020a) noted that trapper harvest depends primarily on trapper effort and believes the unusually high harvest in 2019 resulted from a doubling of the normal trapping effort (32 trappers v. the historical average of 14. 5 trappers). In 2021, reported harvest was 64 wolves (ADF&G 2022).

Most of the wolf harvest in Unit 2 has occurred in January and February when pelts are most prime and fur prices are highest (Porter 2018). Since 2015, most of the wolf harvest has occurred in December because seasons have closed early by emergency order (ADF&G 2019c). Little harvest occurs before December (Porter 2018, SERAC 2017). Between 1997 and 2014, 60% of wolf harvest occurred in January and February on average (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, Bethune 2012). Over the same time period, on average 3% of wolves were harvested before December. Between 2015 and 2018, 32% of wolves were harvested before December on average due to seasons closing early (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, Bethune 2012). Between 2011 and 2018, reported wolf harvest in September and October ranged from 0-6 wolves per year, averaging 0.8 wolves per year (Schumacher 2019, pers. comm. as cited in OSM 2020).

Unreported human-caused mortality includes wounding loss, illegal harvest, and vehicle collisions. As part of an ADF&G research program, Person and Russell (2008) estimated unreported human-caused mortality as 47% of total human-caused mortality based on a study of 55 radio-collared wolves in which 16 of 34 human-caused wolf kills were unreported. Most of the unreported kills were either shot out of season or killed during open seasons and not reported (Person and Russell 2008). Later in the research program, ADF&G reported three of eight radio-collared wolves that died during their study were not reported, suggesting 38% of human-caused wolf kills are unreported (USFWS 2015, Schumacher 2019, pers. comm. as cited in OSM 2020). Thus, unreported harvest accounts for a substantial portion of wolf harvest in Unit 2, which likely resulted in unsustainable harvests in some years (Figure 4) (USFWS 2015, 2016). USFWS (2016) estimated mean total (reported and unreported) annual harvest as 29%, ranging from 11-53%, and concluded that harvest has impacted the Unit 2 wolf population. However, unreported

harvests are implicitly accounted for with the new management strategy as management is based on population estimates and objectives rather than on harvest quotas and reported harvests.

USFWS (2015) notes harvest may explain most of the 2013-2014 population decline if unreported harvest is considered. Relatively easy boat and road access may contribute to high rates of unreported harvest in Unit 2, while the insularity of the population makes it more susceptible to overharvest (USFWS 2015). However, as few wolves in Unit 2 are currently radio-collared, documenting unreported human-caused mortality is difficult and accounting for it when setting harvest quotas was a contentious issue (Porter 2018). Additionally, testimony from Federally qualified subsistence users to the Council indicates high levels of illegal harvest are not occurring (SERAC 2017).

In 1999, the wolf season closed early by emergency order for the first time. Afterward, annual reported harvest declined substantially (Person and Logan 2012, Bethune 2012). Similarly, Porter (2003) notes that the number of successful trappers averaged 17 per year from 1999-2001, which was well below the 10-year average of 27 successful trappers per year. Between 2002 and 2014, the number of successful trappers averaged 12 per year (Porter 2018). The threat of early season closures likely discouraged hunters and trappers from reporting their harvests, and harvest data after 1999 may be less accurate than harvest data prior to 1999 (Person and Logan 2012).

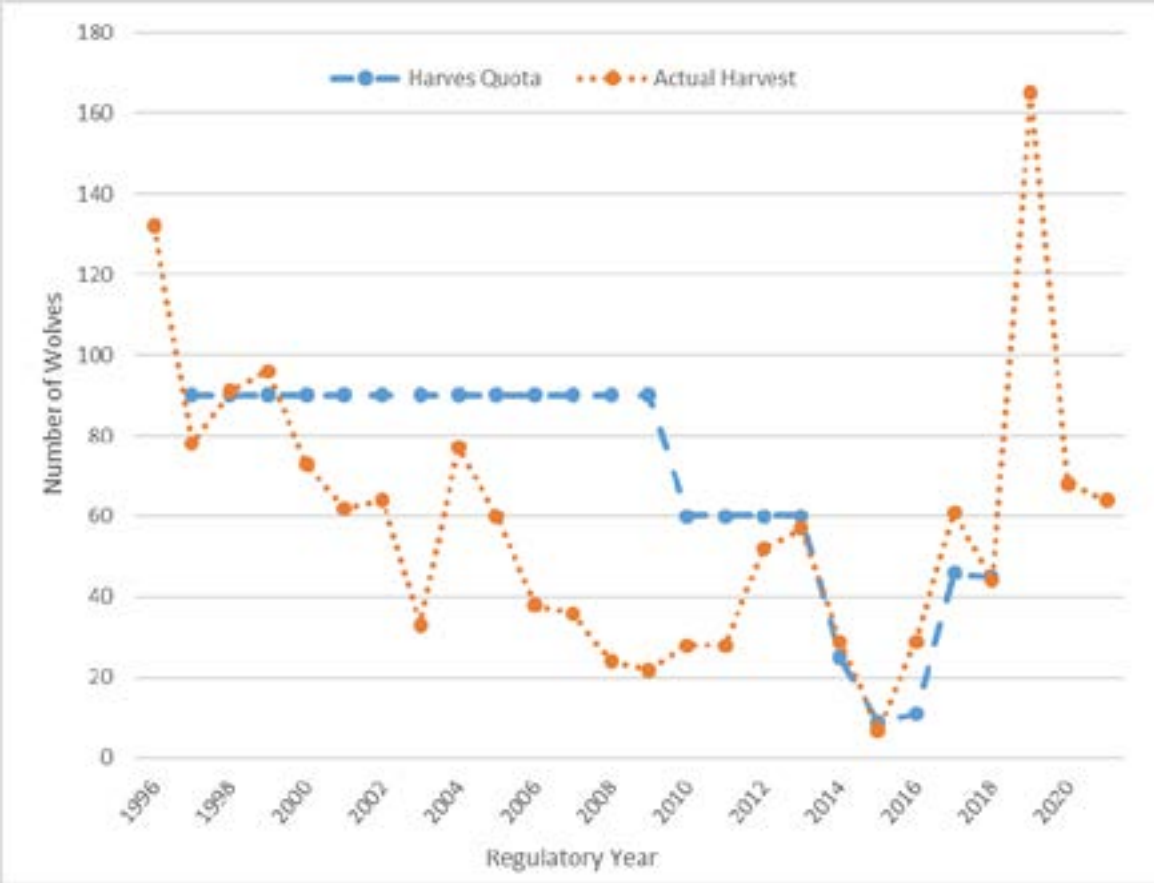


Figure 3. Unit 2 reported wolf harvest and harvest quotas, 1996-2020. Harvest includes reported harvest and other documented human-caused mortality (e.g. vehicle collisions) (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, ADF&G 2020a, 2020b, Schumacher 2021, pers. comm, ADF&G 2022).

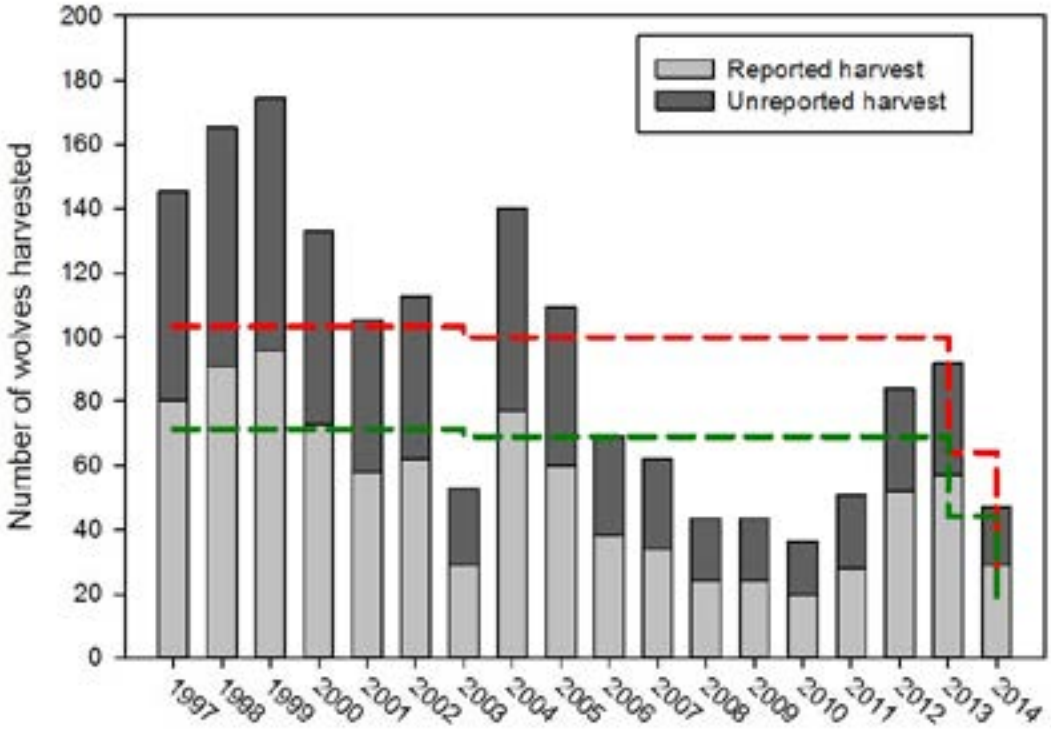


Figure 4. Estimated total number of wolves harvested by regulatory year in Unit 2, 1997-2014. Unreported harvest was estimated using a rate of 0.45 of total harvest from 1997-2011 (Person and Russell 2008) and a proportion of 0.38 of total harvest from 2012-2014 (ADF&G 2015a as cited in USFWS 2015). The green and red dotted line indicates 20% and 30% of the estimated population size, respectively (figure from USFWS 2015).

Effects of the Proposal

If adopted, this proposal would align Federal and State regulations by requiring Federally qualified subsistence users to sequentially number/mark hides, call ADF&G within 7 days of take to report the date and location of take for each wolf, and seal all hides within 15 days of take. Wolves in Unit 2 are managed cooperatively between State and Federal managers. Realigning regulations through adoption of WP22-03 would help continued effective management of wolves in Unit 2.

One of the drivers for this regulation change is the precision of population estimation. DNA from wolves for the annual SECR estimates are collected from mid-October to mid-December. A harvested wolf would represent a data point and, if the harvested wolf was previously detected at a hair board, it would represent a valuable recapture event. The requirement of sequential numbering/marking hides along with a 7-day call-in requirement will aid in minimizing lost or incorrect data and coincide with the methods used for the SECR. Having the hides sequentially numbered/marked will allow data acquired during the 7-day call-in to be correctly correlated with each individual harvested wolf's hair (DNA) sample taken during the sealing process. The State has undergone criticism for the accuracy of wolf population estimates in Unit 2 (ADF&G 2021). In addition, a petition to list the Alexander Archipelago wolf was submitted in 2020 identifying inadequacy of existing regulatory mechanisms as a threat (Wolf et al. 2020). These proposed regulation changes would allow the management agencies to acquire the most precise data possible to aid in estimating the wolf population with more precision and defensibility in

Unit 2. The ability to incorporate harvest data into the SECR estimates will increase the effectiveness of the regulations, avoid exceeding the sustainable harvest of wolves, and help safeguard the wolves from becoming a listed species (ADF&G 2021).

Reducing the sealing timeframe would have minimal effects on Federally qualified subsistence users. From 2012 to 2020, Federally qualified subsistence users were required to seal hides within 14 days of harvest. Requiring the sequential numbering/marking of hides and reporting the date and location of take for each wolf within 7 days may be more burdensome for Federally qualified subsistence users but should benefit them long-term by providing more accurate and precise information on when and where individual wolves were harvested for ADF&G's wolf population estimates and ultimately maximizing harvest opportunity. The new management strategy announces the season length ahead of time providing predictability rather than closing the season when harvest quotas are met. Thus, the sealing requirement should not discourage harvest reporting like it did in the past.

This proposal would not affect other users because this regulation already exists under State regulations. Both subsistence users and non-Federally qualified users may benefit from this proposal since more effective management will help ensure continued long-term availability of this resource.

OSM PRELIMINARY CONCLUSION

Support Proposal WP22-03.

Justification

The sealing requirement is shorter than the current regulation but is one day longer than the sealing requirement prior to the regulation change in 2020. The sequential numbering/marking of hides and reporting the date and location of take for each wolf within 7 days will be more burdensome to hunters/trappers but is essential to tying in harvest data to SECR estimates. Sequentially numbering/marking hides and reporting within 7 days will also help increase the accuracy of hunter's/trapper's records when the hides are sealed, especially if there is a delay due to weather or access to a sealer. Overall, with minimal impacts to Federally qualified subsistence users, this regulation change will allow the management agencies to more effectively estimate the population of wolves in Unit 2, avoid exceeding sustainable harvest, and help safeguard the wolves from becoming a listed species. All users should benefit long-term from more effective use of regulations to manage the wolf population in Unit 2. Effective wolf management in Unit 2 requires coordination between State and Federal agencies, and these proposed changes would realign State and Federal regulations.

ANALYSIS ADDENDUM

OSM CONCLUSION

Support Proposal WP22-03 with modification to remove the seven day reporting requirement.

The modified regulation should read:

Unit 2 –Wolf Hunting

No limit. *Sept. 1-Mar. 31.*

Any wolf taken in Unit 2 ~~must be sealed within 30 days of the end of the season.~~ ***shall be sequentially numbered, marked with the date and location recorded by the hunter or trapper for each wolf, and all hides must be sealed within 15 days of take.***

Unit 2 –Wolf Trapping

No limit. *Nov. 15-Mar. 31.*

Any wolf taken in Unit 2 ~~must be sealed within 30 days of the end of the season.~~ shall be sequentially numbered, marked with the date and location recorded by the hunter or trapper for each wolf, and all hides must be sealed within 15 days of take.

Justification

Reporting harvest at 7 days and again at 15 days after harvest could result in regulatory fatigue for subsistence users and confusion related to the reporting requirements. Reporting harvest within 15 days of take as well as recording the date and location of the wolves taken would be sufficient to provide the data needed to allow the management agencies to estimate the population of wolves more effectively in Unit 2 without the added burden for subsistence users to report their harvest twice.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Southeast Alaska Subsistence Regional Advisory Council

Support WP22-03 with modification to remove the seven-day reporting requirement.

The modified regulations should read:

Unit 2 –Wolf Hunting

No limit.	*Sept. 1-Mar. 31.*

Any wolf taken in Unit 2 ~~must be sealed within 30 days of the end of the season.~~ shall be sequentially numbered, marked with the date and location recorded by the hunter or trapper for each wolf, and all hides must be sealed within 15 days of take.

Unit 2 –Wolf Trapping

No limit.	*Nov. 15-Mar. 31.*

Any wolf taken in Unit 2 ~~must be sealed within 30 days of the end of the season.~~ shall be sequentially numbered, marked with the date and location recorded by the hunter or trapper for each wolf, and all hides must be sealed within 15 days of take.

Justification

The Council was concerned that the numerous changes in regulations applied to hunters/trappers may result in regulatory fatigue and confusion. Double reporting of data is an unnecessary burden on the subsistence user and may produce inaccurate information. The Council recommends removing the seven-day phone reporting requirement, recognizing that hunters and trappers will still be required to provide date and location of wolves within 15 days to help address the need for collecting information. This reporting helps successfully manage wolf populations within Unit 2 to prevent the need to list the Alexander Archipelago wolf as an Endangered Species.

INTERAGENCY STAFF COMMITTEE COMMENTS

The Interagency Staff Committee found the staff analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and Federal Subsistence Board action on the proposal.

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

Wildlife Proposal 22-03

This proposal would align state and federal regulations for the sealing requirements for wolves taken by hunting and trapping in Game Management Unit (GMU) 2.

Background

Current federal sealing regulations no longer align with new state sealing regulations designed to gather more precise information from harvested wolves for use in the Alaska Department of Fish & Game's (ADF&G) annual GMU 2 wolf population estimates. Managing harvest of the GMU 2 wolf population to maintain the fall population within the objective range of 150-200 wolves relies on accurate and precise estimates of abundance. In 2019 when state and federal regulations were updated to implement ADF&G's new GMU 2 wolf harvest management strategy ADF&G neglected to consider the effect that changing the sealing requirement from within 14 days of harvest to within 30 days after the season closes would have on data used for population estimates. The purpose of this proposal is to correct that error on the federal side by aligning their subsistence sealing regulations for wolves harvested in GMU 2 with state sealing requirements updated by the Alaska Board of Game (BOG) at its March 18, 2021 meeting.

ADF&G annually estimates the fall population size for wolves in GMU 2 using a non-invasive DNA-based spatially explicit capture-recapture method where wolf DNA is acquired when wolves roll on an array of scented hair boards throughout northern and central Prince of Wales Island. The Hydaburg Cooperative Association and US Forest Service cooperate in this effort. For wolves detected at hair boards and subsequently harvested, harvest represents a "recapture" event that can be incorporated into population estimates. However, to be valuable as a "recapture event" the DNA, harvest date, and location of the harvested wolf must be matched with the DNA of that same wolf collected at one of the hair boards. Consequently, trappers need to keep track of the date and location where each individual hide was taken. The goals of the shorter sealing period and labeling requirement are to ensure users can keep track of each hide they harvest so they can provide accurate information for individual wolf hides at sealing. More precise data should result in more precise wolf population estimates. More precise estimates will allow managers to provide the greatest sustainable harvest opportunity while also maintaining the wolf population within the objective range.

Wolves sampled at hair board stations may be harvested on federally managed lands where federal subsistence regulations apply or on state, municipal, or private lands where state regulations apply. Aligning state and federal sealing requirements for wolves across GMU 2 would help ensure consistent data for ADF&G's population estimates are collected from all wolves harvested in the unit. Aligning state and federal sealing regulations would also eliminate confusion among users over which regulations apply to harvested wolves and enhance the ability of enforcement agencies to enforce regulations across land management jurisdictions.

Impact on Subsistence Users

This change will not affect subsistence use of wolves, but it will eliminate confusion among users over which regulations apply to harvested wolves.

Impact on Other Users

This change will not affect other uses of wolves, but it will eliminate confusion among users over which regulations apply to harvested wolves.

Hunting and trapping seasons and bag limits for wolves in GMU 2

State season	Bag Limit	Resident and Nonresident
Hunting	five wolves	December 1 – March 31
Trapping	no limit	November 15 – March 31

Federal Season	Bag Limit	Rural Residents Season Length
Hunting	no limit	September 1 – March 31
Trapping	no limit	November 15 – March 31

Conservation Issues

More precise information on when and where each wolf is harvested should contribute toward a more accurate and precise GMU 2 wolf population estimates. More accurate population estimates will enable state and federal managers to better regulate the wolf population through harvest to meet the fall population objective of 150-200 wolves. Maintaining the population within that range is intended to balance the need for a sustainable wolf population with the effect of wolf predation on deer.

Enforcement Issues

If this proposal is adopted it would align state and federal sealing requirements for wolves in GMU 2. A consistent sealing requirement would reduce confusion for federally qualified users. Without alignment, federally qualified users would have to comply with state regulations on state, municipal, and private lands, including the beach below the mean high tide line, and federal requirements on federal land. Law enforcement officers may be unduly burdened if state and federal regulations are not aligned.

Position

ADF&G SUPPORTS the proposal as submitted. The BOG changed state sealing requirements for wolves harvested in GMU 2 in March 2021. To be effective the Federal Subsistence Board should adopt this regulation to reduce regulatory confusion, ease enforcement burden, and promote sound management practices for sustainable harvest of GMU 2 wolves.

WP22-04/05 Executive Summary	
General Description	Proposal WP22-04 requests the establishment of a year-round Federal elk hunt in Units 1, 2, 3, and 4, except on Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands in Unit 3 with a harvest limit of one elk by Federal registration permit. *Submitted by: Southeast Alaska Subsistence Regional Advisory Council.* Proposal WP22-05 requests the establishment of a draw permit hunt for elk in the Etolin Island area of Unit 3 with one permit issued per household *Submitted by: Southeast Alaska Subsistence Regional Advisory Council*
Proposed Regulation	WP22-04 **Units 1, 2, 3, and 4—Elk** *Unit 3, Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands* — No Federal open season *Units 1, 2, 4, and 3 remainder - 1 elk by Federal registration permit* — **July 1- June 30** *Successful hunters are required to send a photo of their elk antlers to ADF&G and a 5-inch section of the lower jaw with front teeth.*

WP22-04/05 Executive Summary		
Proposed Regulation	**WP22-05** **Unit 3—Elk** *Unit 3, Etolin Island area bounded by a line beginning at the intersection of Stikine Strait and Clarence Strait, running southeast following the midline of Clarence Strait, down to its intersection with Ernest Sound, then northeast following the midline of Ernest Sound, excluding Niblack Islands, to its intersection with Zimovia Strait, then northwest following the western shoreline of Zimovia Strait to its intersection with Chichagof Passage, then west along the midline of Chichagof Passage to its intersection with Stikine Strait, then southwest along the midline of Stikine Strait back to the point of beginning– 1 bull by Federal draw permit.* *There will be a drawing for each hunt period. Harvest limit is one bull elk per Federal draw permit. Only one elk permit will be issued per household. A household receiving a State draw permit for elk may not receive a Federal permit. The annual harvest quota will be announced by the USDA Forest Service, Wrangell Ranger District office, in consultation with ADF&GThe Federal harvest allocation will be 25% (rounded up to the next whole number) of elk permits. Successful hunters are required to send a photo of their elk antlers to ADF&G and a 5-inch section of lower jaw with front teeth.* **Unit 3 remainder**	~~*No Federal open season*~~ *Oct 1 – Oct 15* *Oct 16 – Oct 31* **No Federal open season**
OSM Conclusion	**Support** Proposal WP22-04 and **Oppose** Proposal WP22-05.	
Southeast Alaska Subsistence Regional Advisory Council Recommendation	**Support** Proposal WP22-04 and **Oppose** Proposal WP22-0	

WP22-04/05 Executive Summary	
Interagency Staff Committee Comments	WP22-04 The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal. WP22-05 The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.
ADF&G Comments	**Oppose** Proposal WP22-04 and **Oppose** Proposal WP22-05.
Written Public Comments	None

STAFF ANALYSIS
WP22-04/05

ISSUES

Proposal WP22-04, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests the establishment of a year-round Federal elk hunt in Units 1, 2, 3, and 4, except on Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands in Unit 3 with a harvest limit of one elk by Federal registration permit.

Proposal WP22-05, also submitted by the Council, requests establishing a draw permit hunt for elk in the Etolin Island area of Unit 3 with one permit issued per household (Map 1).

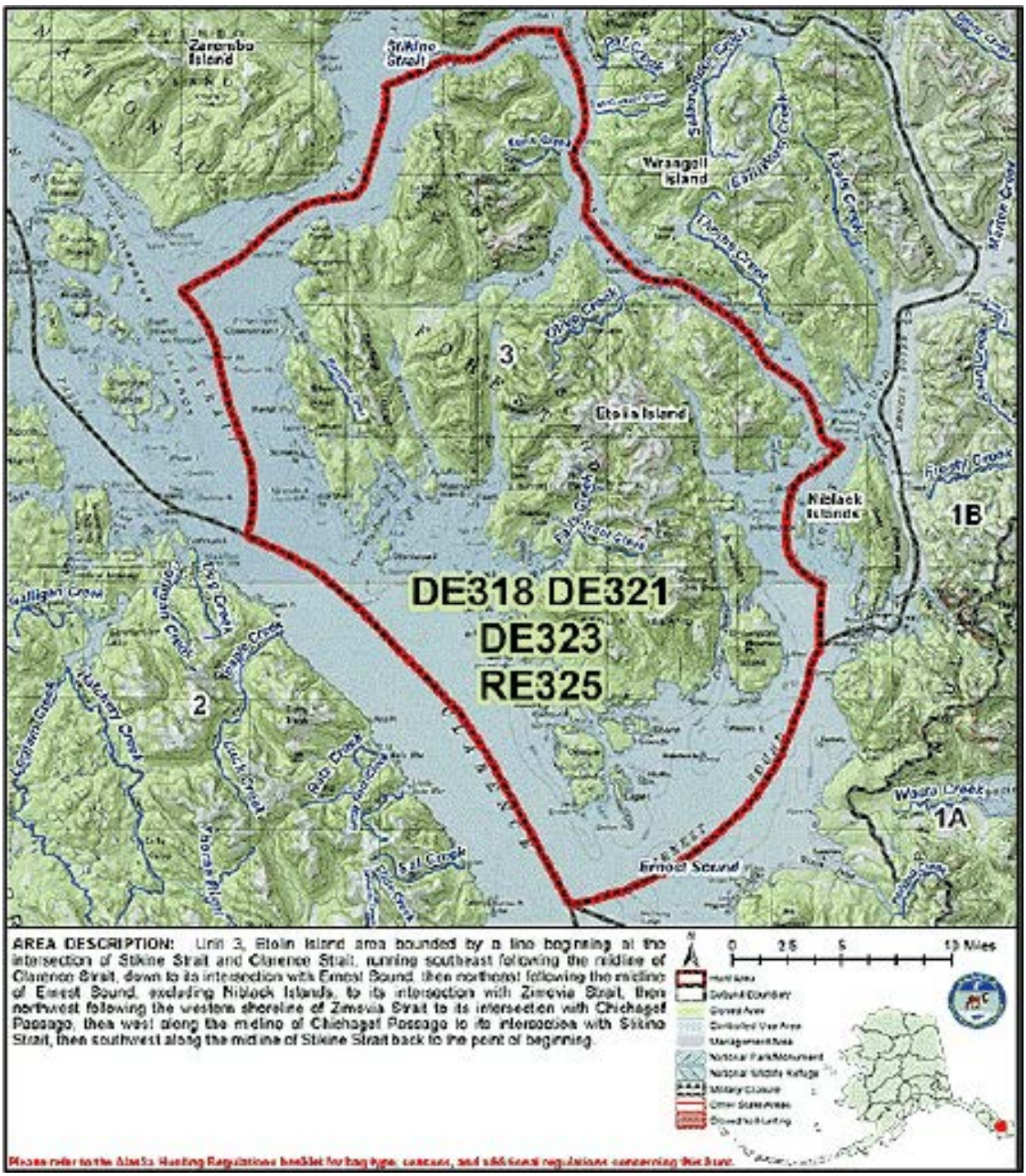
DISCUSSION

In regard to Proposal WP22-04, the proponent requests that a Federal general season be established for harvesting elk outside of the managed Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands to aid in the control of non-native elk and to provide a meaningful subsistence hunting opportunity. The proponent cites the previous State general elk season that encompassed the proposed area and was closed in November of 2018.

In regard to Proposal WP22-05, the proponent requests that a Federal draw permit hunt be established for elk in the Etolin Island area of Unit 3. The proponent stipulates that 25% (rounded up to the next whole number) of the State's annual permit quota be allocated to a Federal draw system. Federally qualified subsistence users will be limited to one permit per household. If one or more members of a household receives a State draw permit, they will be ineligible for a Federal draw permit. The proponent states this proposal would provide a meaningful subsistence priority by reducing competition with non-Federally qualified users and resulting in increased harvests by Federally qualified subsistence users. The proponent states the annual harvest quota prevents any conservation concerns.

Existing Federal Regulation

Units 1, 2, 3, and 4—Elk	*No Federal open season*



Map 1. Hunt area for Unit 3 elk permits DE318, DE321, DE323, and RE325Map was taken from ADF&G 2020-2021 hunting regulations: *https://www.adfg.alaska.gov/static/regulations/wildliferegulations/pdfs/regulations_complete.pdf*

Proposed Federal Regulation

WP22-04

Units 1, 2, 3, and 4—Elk

Unit 3, Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands	*No Federal open season*
Units 1, 2, 4, and 3 remainder - 1 elk by Federal registration permit	*July 1- June 30*

Successful hunters are required to send a photo of their elk antlers to ADF&G and a 5-inch section of the lower jaw with front teeth.

WP22-05

Unit 3—Elk

Unit 3, Etolin Island area bounded by a line beginning at the intersection of Stikine Strait and Clarence Strait, running southeast following the midline of Clarence Strait, down to its intersection with Ernest Sound, then northeast following the midline of Ernest Sound, excluding Niblack Islands, to its intersection with Zimovia Strait, then northwest following the western shoreline of Zimovia Strait to its intersection with Chichagof Passage, then west along the midline of Chichagof Passage to its intersection with Stikine Strait, then southwest along the midline of Stikine Strait back to the point of beginning– 1 bull by Federal draw permit	~~*No Federal open season*~~ *Oct1 – Oct15* *Oct16 – Oct31*

There will be a drawing for each hunt period. Harvest limit is one bull elk per Federal draw permit. Only one elk permit will be issued per household. A household receiving a State draw permit for elk may not receive a Federal permit. The annual harvest quota will be announced by the USDA Forest Service, Wrangell Ranger District office, in consultation with ADF&GThe Federal harvest allocation will be 25% (rounded up to the next whole number) of elk permits. Successful hunters are required to send a photo of their elk antlers to ADF&G and a 5-inch section of lower jaw with front teeth.

Unit 3 remainder	*No Federal open season*

Existing State Regulation

Units 1, 2, and 4—Elk			*No open season*
Unit 3—Elk			
Residents and Nonresidents: Etolin Island area bounded by a line beginning at the intersection of Stikine Strait and Clarence Strait, running southeast following the midline of Clarence Strait, down to its intersection with Ernest Sound, then northeast following the midline of Ernest Sound, excluding Niblack Islands, to its intersection with Zimovia Strait, then northwest following the western shoreline of Zimovia Strait to its intersection with Chichagof Passage, then west along the midline of Chichagof Passage to its intersection with Stikine Strait, then southwest along the midline of Stikine Strait back to the point of beginning	*1 bull by bow and arrow only by permit*	*DE318*	*Sep1 – Sep30*
	1 bull by permit	*DE321*	*Oct1 – Oct15*
	1 bull by permit	*DE323*	*Oct16 – Oct31*
	1 bull by permit	*RE325*	*Nov15 – Nov30*
Residents and Nonresidents: Unit 3, Remainder			*No open season*

Extent of Federal Public Lands

Table 1. Federal public lands in the Southeast Alaska Region, Units 1–4.

Management unit	Percentage Federal public lands	Percentage of Federal public lands managed by each agency
1A	91.3%	91.3% U.SForest Service
1B	98.1%	98.1% U.SForest Service
1C	95.5%	62.6% U.SForest Service 32.9% National Park Service[a]
1D	43.8%	24.9% National Park Service[a] 18.9% U.SForest Service
2	74.0%	74.0% U.SForest Service
3	90.6%	90.6% U.SForest Service
4	92.2%	92.2% U.SForest Service

[a] Glacier Bay National Park, closed to subsistenc

Customary and Traditional Use Determinations

Rural residents of Units 1-5 have a customary and traditional use determination for elk in Unit 3A customary and traditional use determination has not been made for elk in Units 1, 2, and 4. Therefore, all Federally qualified subsistence users may hunt elk in these units.

Regulatory History

Elk were planted on Etolin Island in Unit 3 in 1987 and stable populations became established on both Etolin and Zarembo Islands (Burris and McKnight 1973; Paul 2009). In 1996, a bull only hunt was developed for the 1997 season under State regulations with 30 bull draw permits. The following season, the State issued 70 draw permits for bull elk and a separate archery only season was established. After 6 bulls were harvested on Zarembo Island during the 2005 September- October draw hunt, an emergency order was issued to close the registration elk hunting season on Zarembo Island (Harper 2014). State managers closed Zarembo Island to elk harvest until the bull:cow ratio and total population increased. The island remains closed to elk harvest.

In 2001, in an attempt to limit the dispersal of elk outside of the managed Zarembo and Etolin Islands population, the State instituted a general elk season for Units 1, 2, and the remainder of Unit 3 (Harper 2014). The season allowed for the harvest of any elk outside of the Unit 3 managed areas from August 1 to December 31. The first elk harvested under the general elk hunt was a cow harvested on Shrubby Island in 2004. In 2005, 4 cows were harvested off Shrubby Island and another cow was later harvested from Bushy Island. In a 2012 Alaska Board of Game action, Bushy, Shrubby, and Kashevarof Islands were added to the restricted area and removed from the general elk hunt due to concerns of false reporting and illegal harvest of Zarembo Island elk. In 2018, the State issued an emergency order to discontinue the general elk hunt due to concerns that one or more of the elk harvested during the general season had been harvested illegally from Zarembo or Etolin Islands. The State was never able to verify any harvest locations of elk taken during the general season and believed that hunters were killing elk in the closed or managed areas and submitting false reports or not reporting the harvest.

A Federal elk hunt has never occurred in Units 1-4. In 2020, the Board adopted Proposal WP20-13, establishing a customary and traditional use determination for elk in Unit 3 for rural residents of Units 1-5.

Biological Background

An interagency taskforce was assembled in 1984 to evaluate Etolin, Zarembo, Prince of Wales, and Kuiu Islands for the feasibility of establishing an elk herd (ADF&G 1984, 1986). Both Etolin and Zarembo Islands were found to provide adequate winter and summer habitat and browse for elk. Etolin Island was chosen for its low probability of poaching due to remoteness, lack of snowfall in key areas, size, predator to prey ratio, and low probability of elk spreading to a wilderness (although South Etolin Island later became a wilderness) (USDA Forest Service 1986).

Elk (*Cervus elaphus*) were unsuccessfully transplanted to Southeast Alaska six times prior to 1987 (Burris and McKnight 1973; Paul 2009). In 1985, Alaska passed legislation requiring the introduction of 50 elk to Etolin Island to provide hunting opportunity. In the spring of 1987, 33 Roosevelt (*C. e. roosevelti*) and 17 Rocky Mountain (*C.e nelson*) elk were transplanted to Etolin Island (Harper 2014). Within the first 18 months, roughly two-thirds of the elk were lost due to various causes of mortality. However, a breeding

population was established and spread to Zarembo Island. The original State management goal for Etolin Island was to maintain 250 elk with a harvest of 20 bulls (Harper 2014). The current management goals are to 1) Provide a hunt opportunity 2) Maintain Etolin and Zarembo Island elk herds below the carrying capacity 3) Limit the dispersal of elk to other islands and 4) Maintain an annual post-harvest ratio of 25-30 bulls:100 cows.

The most recent published State aerial survey of southern Etolin Island was on 15 August 2010 and counted 91 elk in 1 herd which was made up of 13 bulls, 59 cows, and 19 calves (Harper 2014). The bull:cow ratio was 22 bulls:100 cows and the calf:cow ratio was 32 calves:100 cows. Collared elk on Etolin Island have been used to determine winter and summer range, calving and rutting areas, important habitat, and to locate elk for minimum population estimates and composition counts. Population estimates of elk in Unit 3 are difficult due to dense brush and remote habitat.

After the elk populations on Etolin and Zarembo were established, concerns developed about the spread of elk throughout Southeast Alaska. Unverified sightings of elk on neighboring islands and documentation of a radio collard elk on Farm Island at the mouth of the Stikine River, led to the State general elk season from 2001-2018 (Paul 2009). The degree of competition between elk and deer in Southeast Alaska is unknown, but the potential exists for elk to compete with Sitka black-tailed deer both directly through physical displacement or indirectly through competition for resources or through changes to the predator prey dynamics (Harper 2014). A study by Kirchhoff and Larsen (1998) showed that the high degree in dietary overlap between elk and deer has the potential to result in competition for valuable browse (Kirchhoff and Larsen 1998).

Harvest History

The State of Alaska issued an average of 181 Unit 3 Etolin Island elk permits per year from 2010 to 2020 (**Table 2**). On average, roughly 40% of permit holders hunted for elk and had a success rate of 8%. During that period, 71 elk were harvested through the State draw DE318 archery (17%), DE321 (49%), DE323 (15%) and registration RE325 (18%) hunts (**Figure 1**). Harvest in those hunts were primarily by Federally qualified residents of Units 1-5 (58%) followed by non-Federally qualified residents of Units 1-5 (Ketchikan, Juneau, Douglas; 35%) (**Table 3**). Alaska residents from the remainder of the state and non-residents made up six percent and one percent of Unit 3 elk harvest, respectively. From 2010 to 2020 Federally qualified residents of Units 1-5 received 46% (925 permits) of the Unit 3 elk permits (**Table 4**). However, only 48% (446 permits) of those permit holders attempted to harvest elk. In general, less than ten percent of draw applicants receive a permit. In 2020, 6 percent of the 2,015 draw applicants received a permit (ADF&G 2021). Hunters who do not draw a permit have the option to receive a State registration permit for Unit 3 elk from Nov. 15 – Nov. 30 unless closed by the State.

The Unit 3 general elk hunt was available from 2001 to 2018 and allowed for the harvest of any elk outside of the Unit 3 elk management area (Etolin and Zarembo Islands). The first elk harvested under the general elk hunt was a cow harvested in 2004In 2005, 5 more cows were harvested during the general season. No elk harvest was reported during the Units 1-3 general elk season between 2010 and the emergency closure in 2018. With no reported harvest and limited anecdotal reports of sightings on neighboring islands, the season was closed by the State. The State was not able to verify the harvest locations of elk taken under the general permit and cited concerns over the use of the permit to poach elk from Etolin and Zarembo Islands in the 2018 closure notice.

Table 2. Permits issued, permits hunted, and elk harvested from 2010-2020 in Unit 3Data provided by ADF&G permit harvest records (Robbins 2021, perscomm.).

Year	Permits Issued	Permits Hunted	Elk Harvest
2010	180	51	6
2011	174	58	9
2012	173	72	7
2013	187	77	4
2014	184	76	5
2015	185	57	7
2016	196	73	5
2017	174	80	9
2018	189	86	7
2019	182	85	7
2020	166	73	5
Total	**1990**	**788**	**71**
Avg.	**181**	**72**	**6**

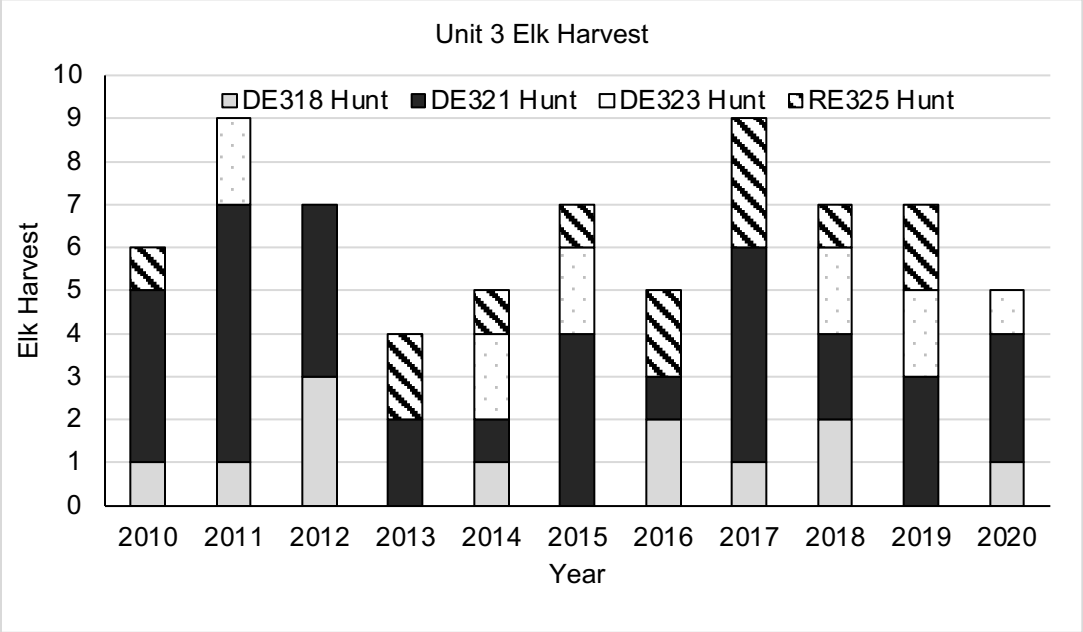


Figure 1. Unit 3 elk harvest by hunt permit DE318 Archery (Sep1-Sep30), DE321 (Oct1-Oct15), DE323 (Oct16-Oct31), and RE325 (Nov15-Nov30) from 2010-2020Three additional bull elk were harvested between 2010-2020 through ADF&G's auction permit program. No elk were harvested during the Unit 1-3 general season hunt between 2010 and the emergency closure in 2018Data provided by ADF&G permit harvest records (Robbins 2021, per-scomm.).

Table 3. Unit 3 total elk harvest by community and residency for DE318 Archery (Sep1-Sep30), DE321 (Oct1-Oct15), DE323 (Oct16-Oct31), and RE325 (Nov15-Nov30) from 2010-2020Table includes percent total harvest by community from 2010-2020Data provided by ADF&G permit harvest records (Robbins 2021, perscomm.).

Residency	Community	Elk Harvest	Percent
Federally Qualified Resident Units 1-5	Coffman Cove	1	1%
	Craig	9	13%
	Edna Bay	3	4%
	Hollis	1	1%
	Klawock	6	8%
	Naukati Bay	1	1%
	Petersburg	4	6%
	Sitka	2	3%
	Thorne Bay	1	1%
	Wrangell	13	18%
	Total	**41**	**58%**
Non-Federally Qualified Resident Unit 1-5	Douglas	1	1%
	Juneau	6	8%
	Ketchikan	18	25%
	Total	**25**	**35%**
Non-Resident	Nonresident	1	1%
	Total	**1**	**1%**
Other Alaska Residents	Anchorage	1	1%
	Homer	1	1%
	Sterling	1	1%
	Tok	1	1%
	Total	**4**	**6%**

Table 4. Unit 3 elk harvest by Federally qualified subsistence users from 2010-2020 by community. Harvest was during for DE318 Archery (Sep1-Sep30), DE321 (Oct1-Oct15), DE323 (Oct16-Oct31), and RE325 (Nov15-Nov30) Data provided by ADF&G permit harvest records (Robbins 2021, pers Comm.).

Community	Permits Issued	Permits Hunted	Elk Harvested
Coffman Cove	62	29	1
Craig	131	59	9
Edna Bay	6	4	3
Elfin Cove	2	0	0
Gustavus	2	2	0
Haines	18	4	0
Hollis	2	1	1
Hoonah	9	1	0
Hydaburg	1	1	0
Kake	2	2	0
Kasaan	2	0	0
Klawock	29	14	6
Metlakatla	8	3	0
Meyers Chuck	11	7	0
Naukati Bay	3	1	1
Pelican	3	0	0
Petersburg	122	62	4
Sitka	44	19	2
Tenakee Springs	3	2	0
Thorne Bay	76	32	1
Ward Cove	67	29	0
Whale Pass	2	0	0
Wrangell	320	174	13
Total	**925**	**446**	**41**

Other Alternatives Considered

One considered alternative to Proposal WP22-05 was to establish a Federal season within the management area of Unit 3 with a harvest limit of one bull elk by Federal registration permit. A Federal registration permit hunt would preclude the allocation issue of draw permits as proposed by WP22-05. Considering only six elk are harvested each year on average out of 181 permits issued, the elk population can likely withstand some increase in harvest. Additionally, since only 48% of Federally qualified draw permit holders actually hunt and only account for about half of the elk harvest in Unit 3 each year, harvest within the management area by a Federal registration permit hunt is expected to be very low but would provide a meaningful subsistence priority and opportunity. Furthermore, authority to close the season when a certain number of elk were reported by Federal permit could be delegated to a Federal in-season manager to further mitigate any conservation concerns associated with overharvest.

Effects of the Proposal

WP22-04

The proposed regulation would allow Federally qualified users to harvest one elk by Federal registration permit from Units 1, 2, 4, and the remainder of Unit 3. The proposed harvest would provide additional subsistence opportunity for residents of Units 1-5 in Unit 3 and for all Federally qualified subsistence users in Units 1, 2, and 4. However, sightings of elk on islands other than Etolin and Zarembo have been rare and anecdotal, suggesting that harvest opportunity would be very limited. The State management goals for elk in Unit 3 include limiting the dispersal of elk to islands other than Etolin and Zarembo. A general elk season may help limit the spread of elk to islands in the area while providing subsistence opportunity.

Elk in Southeast Alaska may compete with deer and alter predator prey interactions. A general elk season would be a helpful management tool if a population of elk were to colonize neighboring islands. There are no known conservation concerns associated with a general elk season due to the State's desire to limit elk populations to a specific management area (Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands) and because elk are a non-native species in these units. However, the populations of elk within the management area may be negatively affected if general elk permits are used to illegally harvest from these populations, as suspected during the State general season.

Enforcement of a general elk season would be difficult as the elk management area and the general season harvest area are both large and difficult to patrol. Law enforcement was unable to verify the site of any elk harvested under the State's general elk season and would likely have the same difficulties with the proposed Federal general elk season.

Adoption of Proposal WP22-04 would also increase regulatory complexity and user confusion by misaligning State and Federal regulations. Federally qualified subsistence users would need to distinguish between Federal and non-Federal lands when hunting elk in these units to ensure the elk are legally harvested on Federal public lands.

The proposal also requires successful hunters to send a photo of their elk antlers and section of the lower jaw to ADF&G. However, this requirement under Federal regulations needs approval from the Office of Management and Budget and cannot be authorized solely by the Board through adoption of a wildlife proposal.

WP22-05

The proposed regulation would allocate 25 percent of the Unit 3 State elk draw permits to a Federal subsistence draw permit hunt. The Federal elk draw hunt could increase the participation of Federal harvesters in the Unit 3 elk harvest. However, between 2010 and 2020, 46 percent of elk permits were received by Federally qualified residents. During that same period approximately 52 percent of Federally qualified permit holders did not participate in the hunt, suggesting that there is a surplus of permits issued to Federally qualified residents each year. Due to the low success rate, remoteness, and rough terrain of the harvest area, participation in the Federal draw hunt would likely be similar to the State draw hunts. Additionally, Federal draw permit holders could only hunt on Federal public lands and would need to distinguish between Federal and non-Federal managed lands.

Section 815 of ANILCA provides that the Board may restrict non-subsistence uses on Federal public lands if "necessary for the conservation of healthy populations of fish and wildlife" or "to continue subsistence uses of such populations." 50 CFR 100.4; 36 CFR 242.4. The residents of Ketchikan have historically received the largest single proportion (25%) of Unit 3 elk permits. The allocation of Federal permits would negatively impact non-Federally qualified users.

The Federal draw hunt would not increase the number of Unit 3 elk draw permits issued and would not likely increase the number of elk harvested under draw permits. However, the proposal, as written, would allow a Federal harvester to receive a Federal draw permit and a State registration permit which may increase harvest opportunity. State regulations currently prohibit anyone from receiving two Unit 3 elk permits in one year.

The proposal restricts any household from receiving more than one Unit 3 Federal elk permit or using both a State draw and Federal draw permit for the same year. Enforcing the permit restrictions would be difficult and may require a permit holder to list all members of their household to be shared with both State and Federal managers. There is currently no system for ensuring that harvesters do not obtain both State and Federal permits for the same year. Additionally, Federal regulations cannot prohibit participation by an individual in a State hunt, so this requirement is not legal.

OSM CONCLUSION

Support Proposal WP22-04 and **Oppose** Proposal WP22-05.

Justification

WP22-04

There is no conservation concern for elk outside of the Unit 3 elk management area. A Federal general elk season may provide limited subsistence opportunity to residents of the area while helping to manage the spread of elk.

WP22-05

Federally qualified subsistence users harvest an average of 58 percent of Unit 3 elk. Roughly 52 percent of the permits issued to Federally qualified residents in the past 11 years were not used, likely due to the low success rate, remoteness, and difficult terrain of the hunt. Hunters who do not draw a permit have the option to receive a State registration permit for Unit 3 elk from Nov. 15 – Nov. 30 unless closed by the State. The large percentage of unused permits by both Federally qualified and non-Federally qualified users, and the availability of a State registration permit suggest that the restriction of non-Federally qualified users is not necessary to continue subsistence uses of the Unit 3 elk population. Enforcement of the Federal draw permit's household restriction would be difficult for both State and Federal managers since it may require sharing permit holder information, while prohibiting participation in the State hunt is not legal.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Southeast Alaska Subsistence Regional Advisory Council

Support WP22-04. The Council submitted this proposal to create subsistence harvest opportunity while avoiding restrictions to non-Federally qualified harvesters or harvest closures. The Council recognized local knowledge that there are elk outside of the elk management area and believes that a Federal season would control the spread of elk. The proposed Federal elk season is in line with established fish and wildlife principals and would stop elk from spreading to neighboring islands and outcompeting deer. There are no conservation concerns, and this opportunity would be beneficial to subsistence users.

Oppose WP22-05. The Council submitted this proposal to create a meaningful subsistence priority; however, based on the information contained in the analysis, the proposal, as written, would not meet its intent. The Council suggested that a future proposal on this issue should include a registration hunt to allow for subsistence harvest on Federal public lands to provide a meaningful priority for Federally qualified users.

INTERAGENCY STAFF COMMITTEE COMMENTS

WP22-04

The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.

WP22-05

The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

Wildlife Proposal WP22-04

This proposal would establish a federal registration hunt for elk in Game Management Units (GMU) 1,2,4, and the remainder of GMU 3 excluding Etolin, Zarembo, Bushy, Shrubby, and the Kashevarof Islands. Federally qualified users (FQU) residing in GMUs 1-5 would be eligible to participate in this hunt.

Background

In 1987 33 Roosevelt and 17 Rocky Mountain elk were translocated from Oregon to Southeast Alaska and released on Etolin Island. Following an initial decline, the population grew, and by the summer of 1991 a small group of Rocky Mountain elk had dispersed to nearby Zarembo Island. Both populations continued to grow, and the first hunt occurred in fall 1997. Since then, a variety of archery and rifle draw, registration, and general season hunts have been used to manage these elk populations to meet Alaska Board of Game (BOG) expectations. In 1993 and 1998 the BOG issued findings stating that to minimize

the potential for competition with or transmission of diseases or parasites to native Sitka black-tailed deer the department should manage hunting to maintain elk below carrying capacity and confine them to Etolin and Zarembo islands.

In 2000, the BOG established boundaries for the GMU 3 drawing hunt area and authorized an either sex elk hunt from 1 August through 31 December in GMUs 1, 2, and the remainder of GMU 3 outside of the drawing hunt area. The goal of that hunt was to confine the introduced elk to Etolin and Zarembo islands.

Since 2001, a total of seven elk, including six cows, have been reported harvested under the general season hunt. In 2004 a cow elk was reported harvested outside the GMU 3 drawing permit area on Shrubby Island. In 2005 four hunters each reported harvesting cow elk on Shrubby Island. In 2011 a hunter reported harvesting a cow elk at Fool's Inlet on Wrangell Island. None of those harvest locations were verified by department biologists or enforcement officials. Zarembo Island is the closest known population of elk to Shrubby Island. In 2017 there was verified harvest of a bull elk on Southerly Island, immediately adjacent to Zarembo Island and the drawing hunt area boundary. Due to apparent low numbers, elk hunting on Zarembo Island has been closed since 2005.

ADF&G closed the general season elk hunt in 2018 for the remainder of GMU 3 by emergency order over concern that elk were being illegally harvested within the drawing hunt area but reported as taken outside that area under the general season hunt. That concern was bolstered by the absence of confirmed elk sightings outside of the Etolin and Zarembo drawing hunt boundary, and in 2019 the BOG eliminated the state general season elk hunt. Illegal take of elk from Etolin and Zarembo islands is an ongoing concern for managers. See the Enforcement Issues section for an account of poaching from fall 2021.

Impact on Subsistence Users

Adopting this proposal would provide additional elk hunting opportunity for FQUs residing in GMUs 1-5. However, there is no evidence that elk are found outside of Etolin and Zarembo islands, and this additional hunting opportunity is unlikely to result in lawful harvest.

Impact on Other Users

Adopting this proposal may reduce elk hunting opportunity for other users. The state general season elk hunt was eliminated because over 30 years after they were introduced there was no verified evidence of elk outside of Etolin and Zarembo islands and because of concern that the general hunt facilitated unlawful take of elk from Etolin and Zarembo islands. Adopting this proposal may again facilitate unlawful harvest, which would deprive other users of future lawful harvest opportunity.

Opportunity Provided by State

State customary and traditional use findings: The BOG has made a negative customary and traditional use findings for elk in GMU 3.

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 board 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.

There is no ANS for elk in GMUs 1–4. The seasons and bag limit for elk in GMU 3 is:

Unit/Area	Bag Limit	Open Season (Permit/Hunt #) Resident[a]	Open Season (Permit/Hunt #) Nonresident
GMU 3/Etolin and associated islands	1 bull (by bow and arrow only)	1 Sept– 30 Sept. (Draw Permit/DE318)	1 Sept– 30 Sept. (Draw Permit/DE318)
GMU 3/Etolin and associated islands	1 bull	*1 Oct– 15 Oct (Draw Permit/DE321)*	*1 Oct– 15 Oct (Draw Permit/DE321)*
GMU 3/Etolin and associated islands	1 bull	16 Oct– 31 Oct. (Draw Permit/DE323)	16 Oct– 31 Oct. (Draw Permit/DE323)
GMU 3/Etolin and associated islands	1 bull	15 Nov– 30 Nov (Registration Permit)	15 Nov– 30 Nov (Registration Permit)

[a] Subsistence and General Hunts.

Special instructions: Successful state hunters are required to report harvested elk to ADF&G within 5 days, as well as submit the lower front teeth (on a 5-inch section of jaw) and a photograph of their elk antlers.

Conservation Issues

There are no conservation concerns for elk in GMU 3. However, management objectives for GMU 3 elk include confining them to the Etolin and Zarembo islands hunt area. In recent decades ADF&G has no evidence that elk occur outside of Etolin and Zarembo islands. Due to dense forest cover abundance of elk on both islands is difficult to monitor. Both populations are believed to be relatively small, particularly the Zarembo Island population, which has been closed to hunting since 2005. Unlawful harvest remains a concern (see Enforcement Issues), and the proposed hunt could facilitate additional unlawful harvest from those small populations.

Enforcement Issues

The state general season hunt for elk was eliminated because of concern that elk were being unlawfully harvested from Etolin and Zarembo Islands and reported as harvested during the general season hunt outside the GMU 3 elk drawing hunt area. Unlawful take of elk from Etolin and Zarembo islands remains a concern. On November 13, 2021 state and federal enforcement officials on a joint patrol discovered remains of a cow elk on Beach Road northern Zarembo Island. The skull appeared to have entry and exit wounds from a bullet and the hide was cut and removed in a manner consistent with human processing. Photos were taken, specimens were collected, and the incident was documented in Alaska Wildlife Trooper case file, AK21130680. If this proposal is adopted, concern about the new federal subsistence hunt enabling illegal take would resurface. It is unclear what capacity the federal in-season manager, the U.S. Forest Service, has to enforce hunting regulations in the remote areas affected by this proposal.

Position

ADF&G **OPPOSES** this proposal. It has been over 30 years since elk were introduced and there are still no verified accounts of elk becoming established outside of Etolin and Zarembo islands. Consequently,

this hunt is unnecessary for confining elk to those islands and provides no real opportunity for subsistence harvest, but it would again invite unlawful harvest from the Zarembo and Etolin island populations.

Wildlife Proposal WP22-05

This proposal would establish two federal drawing hunts for elk in GMU 3 with bag limits of one bull elk. Those hunts would correspond to state draw hunts, DE321/323, and 25 percent of the "harvest allocation", which given how the system currently operates we interpret to mean permits, available for those hunts would be allocated to the federal draw hunts. Federally qualified users (FQU) residing in Game Management Units (GMU) 1-5 would be eligible to apply for permits.

Background

In 1987 33 Roosevelt and 17 Rocky Mountain elk were translocated from Oregon to Southeast Alaska and released on Etolin Island. Following an initial decline, the population grew, and by the summer of 1991 a small group of Rocky Mountain elk had dispersed to nearby Zarembo Island. Both populations continued to grow, and the first hunt occurred in fall 1997. Since then, a variety of archery and rifle draw, registration, and general season hunts have been used to manage these elk populations to meet Alaska Board of Game (BOG) expectations. In 1993 and 1998 the BOG issued findings stating that to minimize the potential for competition with native Sitka black-tailed deer the department should manage hunting to maintain elk below carrying capacity and confine them to Etolin and Zarembo islands.

In 1996 the BOG established a bull only drawing hunt in GMU 3 with the first hunt occurring in fall 1997. In 2000 the BOG established boundaries for the GMU 3 drawing hunt area. The original drawing hunt area included both Etolin and Zarembo Islands. In 2005 following harvest of 6 bulls in the archery hunt, an emergency order was issued closing the Zarembo Island portion of the hunt area. Prior to the start of the 2006 season a decision was made not to reopen the elk season on Zarembo Island until the population's bull:cow ratio increased, and Zarembo Island has remained closed ever since.

The current GMU 3 elk hunt area includes Etolin Island and a collection of small islands to the south. ADF&G presently offers 3 drawing hunts including an archery-only hunt (DE318) and two rifle hunts (DE321 and DE323). A total of 125 drawing permits are issued each year. A state registration hunt (RE325) is also offered. Registration permits are not limited, and over the last 10 years an average of 66 registration permits have been issued. Both resident and nonresident hunters are eligible to obtain drawing and registration permits for GMU 3 elk.

Resident hunters are far more successful than nonresidents. Of the 50 elk permits issued to nonresident hunters between 2011 and 2020 only 13 reported hunting and none were successful. From 2011 through 2020 an average of 181 elk permits (drawing and registration) were issued for GMU 3 elk (Table 1), and nearly half of those permits were issued to FQUs. Elk hunting in GMU 3 is physically and logistically challenging, and on average only about 40% of hunters issued permits report hunting.

Table 1. GMU 3 elk harvest data for all permit hunts (2011-2020)

Regulatory year	Permits Issued[a]	Percent did not hunt	Percent successful hunters	Bulls	Cows	Harvest
2011	174	67	16	9	0	9
2012	173	58	10	7	0	7
2013	187	59	5	3	1	4

Regulatory year	Permits Issued[a]	Percent did not hunt	Percent successful hunters	Bulls	Cows	Harvest
2014	184	58	7	5	0	5
2015	185	69	12	7	0	7
2016	196	62	7	5	0	5
2017	174	54	11	9	0	9
2018	189	54	8	7	0	7
2019	182	53	8	7	0	7
2020	166	56	7	5	0	5
Average	181	59	9	6.4	0	**6.5** [a]

Includes the total number of draw and registration permits issued

Over the last 10 seasons an average of 7 elk were harvested annually, ranging from 4 in 2013 to 9 in 2011 and 2017. During this period most elk were harvested under drawing hunts, DE321/323. Archery hunters harvested an average of 1 elk per year during the September archery drawing hunt, and registration permit hunters also harvested an average of 1 elk during the 16-day November season. Hunter success over the last 10 seasons has averaged 9% and ranged from 5% in 2013 to 16% in 2011.

Analysis

This proposal would reduce hunting opportunity for non-federally qualified users (NFQU) by allocating 25% of the permits available for state draw hunts, DE321/323, to the federal draw hunts. This proposal equates to a partial closure to NFQUs at a time when there are no conservation concerns associated with the Etolin Island elk population. That introduced population of elk is inherently small and managed with drawing permits due to habitat constraints and findings by the BOG directing the department to manage hunting to confine elk to Etolin and Zarembo islands.

Further, the BOG made a negative Customary and Traditional Use determination for elk in GMU 3. That finding likely reflects that the elk were introduced, the population is confined and offers limited sustainable harvest opportunity, and that the hunt is among the most physically and logistically challenging hunts in Southeast Alaska. In an average year over 50 FQUs are issued state drawing permits, but less than half report that they actually hunted elk. This low rate of participation by permitted FQUs suggests that elk hunting opportunity provided by the current state hunts already exceeds demand and that additional opportunity provided by the proposed federal permits would only serve to further exceed that demand while unnecessarily depriving NFQUs of opportunity.

Locally based FQUs also already enjoy substantial advantages in this hunt compared to NFQUs. The elk primarily occur on southern Etolin Island, which is mostly within the US Forest Service South Etolin Wilderness. No registered guides offer elk hunts, no lodges or cabins are available, and there are few sheltered anchorages. Therefore, stormy fall weather can play a big role in access and hunter success. Compared to NFQUs locally based FQU hunters can wait for good weather and hunt when conditions are favorable.

Finally, an unlimited number of state registration permits (RE325) are available to all hunters including FQUs. Those permits provide 16 days of elk hunting opportunity during the latter half of November when elk are concentrated at lower elevations and more commonly visible near the beach.

Impact on Subsistence Users

Adopting this proposal would increase opportunity for FQUs by allocating 25% of the drawing permits

available under state hunts DE321/323 to two new federal draw hunts open only to the small number of FQUs residing in GMUs 1-5. Those same FQUs would remain eligible to participate in the state draw for DE321/323 permits, but they could only possess one GMU 3 elk drawing permit.

Impact on Other Users

If adopted, the number of permits issued through the state drawing hunt system for hunts DE321/323 would decline by 25 percent to compensate for the number of federal permits issued for parallel federal hunts. Opportunity for NFQUs and FQUs residing outside of GMUs 1-5 would decrease.

Opportunity Provided by State

State customary and traditional use findings: The BOG has made negative customary and traditional use findings for elk in GMU 3.

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 board 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.

There is no ANS for elk in GMU 3. The season and bag limit for GMU 3 is:

Unit/Area	Bag Limit	Open Season (Permit/Hunt #) Resident[a]	Open Season (Permit/Hunt #) Nonresident
GMU 3/Etolin and associated islands	1 bull (by bow and arrow only)	1 Sept– 30 Sept. (Draw Permit/DE318)	1 Sept– 30 Sept. (Draw Permit/DE318)
GMU 3/Etolin and associated islands	1 bull	*1 Oct– 15 Oct (Draw Permit/DE321)*	*1 Oct– 15 Oct (Draw Permit/DE321)*
GMU 3/Etolin and associated islands	1 bull	16 Oct– 31 Oct. (Draw Permit/DE323)	16 Oct– 31 Oct. (Draw Permit/DE323)
GMU 3/Etolin and associated islands	1 bull	*15 Nov– 30 Nov (Registration Permit)*	*15 Nov– 30 Nov (Registration Permit)*

[a] Subsistence and General Hunts.

Special instructions

Successful state hunters are required to report harvested elk to ADF&G within 5 days, as well as submit the lower front teeth (on a 5-inch section of jaw) and a photograph of their elk antlers.

Conservation Issues

There are no conservation concerns for the Etolin Island elk population. The introduced and inherently small Etolin Island elk herd is constrained by available habitat and by findings of the BOG directing ADF&G to confine elk to Etolin and Zarembo islands. Due to dense forest cover elk abundance is difficult to monitor, so the department has designed a hunt strategy that offers significant harvest opportunity while also conserving the population

Enforcement Issues

Federal subsistence regulations only apply on federal public lands, and nearly all uplands in the proposed hunt area are federally managed. However, elk are often visible on tidelands, and tidelands below mean high water are owned by the State. Hunters and enforcement officials will have difficulty determining when elk sighted on tidelands are lawful to harvest under federal permits. It is also unclear what capacity the U.SForest Service has to enforce hunting regulations on the remote southern end of Etolin Island where federal permittees are most likely to hunt elk.

Position

ADF&G **OPPOSES** this proposal because there are no conservation concerns for the Etolin Island elk population and there is no evidence the continuation of subsistence uses is currently being impacted. As directed by Congress in Section 802 of ANILCA, subsistence uses of wildlife shall be the priority consumptive use on federal public lands "when it is necessary to restrict taking in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such population." Section 815 of ANILCA provides that a restriction on taking wildlife for non-federally qualified hunters is only authorized if "necessary for the conservation of healthy populations of fish and wildlife, for the reasons in Section 816, to continue subsistence uses of such populations, or pursuant to other applicable law." The State currently provides ample elk hunting opportunity in GMU 3 through three drawing hunts and one registration hunt under which an unlimited number of permits is available. All FQUs may acquire a state-issued RE325 registration permit and hunt elk on Etolin Island from Nov. 15 – Nov. 30. If this was such a necessity then a person could assume that more than 40% of FQUs who acquire state registration or draw permits would be hunting for the elk they obtained a permit to hunt. Passing this proposal would only further complicate management of this elk herd and cause confusion for FQUs on where they are allowed to legally hunt.

WP22-07 Executive Summary	
General Description	Wildlife Proposal WP22-07 requests that the Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner in Unit 4 be closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users. *Submitted by: Southeast Alaska Subsistence Regional Advisory Council.*
Proposed Regulation	**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 Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users hunting under these regulations.***
OSM Conclusion	**Oppose**
Southeast Alaska Subsistence Regional Advisory Council Recommendation	**Support** WP22-07 **with modification** to remove wildlife analyses areas 4044 and4043 from the proposed closure area. OSM's interpretation of the Council's intent is: The modification 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* ***Drainages of Admiralty Island flowing into Chatham Strait between Fishery Point and Point Gardner, except drainages flowing into Thayer Lake, Hasselborg Lake, and Hasselborg Creek are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users.***

WP22-07 Executive Summary	
Interagency Staff Committee Comments	The ISC acknowledges the extensive discussion by the Council members about the closure policy application to this situation. This was one of four proposals for Unit 4, which overall has a healthy population of deer, but is experiencing subareas where subsistence users are not able to harvest enough deer for their needs. The Council submitted this proposal because of concerns brought to them by the affected Federally qualified subsistence users in Angoon about not meeting subsistence needs for deer. The proposal review process allowed them to review the available data and hear testimony from all affected users of the resources. During the meeting, they acknowledged that the data in the State reporting system used to measure effort does not reflect success in subsistence hunting because subsistence hunting of deer is opportunistic and users generally only report when they are successful. They crafted a modification in area and season that limits the impacts to the non-Federally qualified users and addresses the needs of subsistence users.
ADF&G Comments	**Oppose**
Written Public Comments	**57 Oppose, 1 Neutral**

STAFF ANALYSIS
WP22-07

ISSUES

Wildlife Proposal WP22-07, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests that Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner in Unit 4 be closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users.

DISCUSSION

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

Existing Federal Regulation

Unit 4 - Deer

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

Proposed Federal Regulation

Unit 4 - Deer

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

Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, 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		
3 deer total	*Bucks*	*Aug. 1 – Sept.14*
	Any deer	*Sept. 15 – Dec. 31*
Remainder		
6 deer total	*Bucks*	*Aug. 1 – Sept.14*
	Any deer	*Sept. 15 – Dec. 31*

Extent of Federal Public Lands

Unit 4 is comprised of approximately 96% Federal Public Lands and consist of 99% U.S. Forest Service (USFS) managed lands and less than 1% National Park Service or U.S. Fish and Wildlife Service managed lands (**Figure 1**. Unit 4 map with proposal analysis area encircled in red.). It consists primarily of Admiralty, Baranof, and Chichagof Islands, along with some smaller adjacent islands.

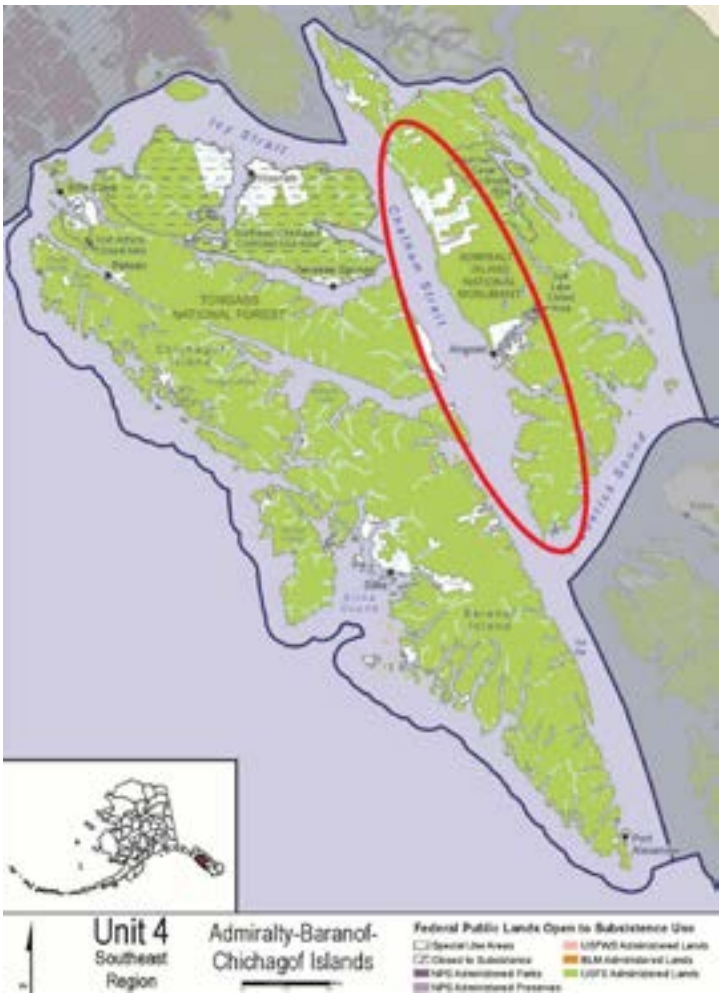

Figure 1. Unit 4 map with proposal analysis area encircled in red.

Most of the area addressed in this proposal is within the Admiralty Island National Monument and the Kootznoowoo Wilderness. The most notable non-Federal land holdings are the area immediately surrounding the village of Angoon, and a strip of land surrounding most of Mitchell, Kanalku, and Favorite Bays, where the Kootznoowoo Corporation owns lands within 660 feet of tidewater (Alaska National Interest Lands Conservation Act, Section 506(a)(3)(c)).

CUSTOMARY AND TRADITIONAL USE DETERMINATION

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

Regulatory History

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. Harvest of antlerless deer has 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. In 1993, the northeast Chichagof Island area was closed to non-Federally qualified users after November 1.

Since 1992, the State season has been from August 1 through December 31 with the antlerless deer season 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 harvest limit has been three deer while the harvest limit for the remainder of Unit 4 has been four deer. 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 six deer and the season was extended from August 1 until January 31. In 2019, the Board of Game increased the State bag limit from 4 to 6 deer in the Unit 4 remainder area, excluding Chichagof Island east of Port Frederick and north of Tenakee Inlet.

There were three regulatory proposals during the 2010 Federal subsistence wildlife cycle addressing Unit 4 deer regulations following the steep population drop that occurred during the prior harsh winters. These proposals analyzed a variety of timing and harvest restrictions to protect the deer population and subsistence priority. None of the proposals were adopted. Instead, Federal and State managers closed the doe harvest season in the Northeast Chichagof Controlled Use Area (NECCUA) for the 2010 regulatory year and portions of the 2011 and 2012 regulatory years to help the deer population recover from deep-snow winters of 2006 through 2009.

Proposal WP12-06 sought to rescind the January Federal deer season in Unit 4 but was rejected by the Federal Subsistence Board because it would not address a conservation concern and the January season is important for Federally qualified subsistence users. There have been no Federal regulatory changes since 2012.

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 the primary predator, besides humans, are brown bears. Brown bears are estimated to kill an amount of deer equal to 15%-20% of the annual total deer harvested by hunters (Mooney 2009). Unit 4 deer population levels fluctuate, primarily because of winter snow depths (Olson 1979).

Habitat

Old-growth forests are considered primary deer winter range, in part because the complex canopy cover allows sufficient sunlight through for forage plants to grow but intercepts snow, making it easier for deer to move and forage during winters when deep snow hinders access to other habitats. Some areas of Unit 4 have been impacted by large scale changes in habitat, while the habitat is largely intact in other areas.

Areas with substantial timber harvest, such as northeastern Chichagof and northwestern Baranof Islands, are expected to have lower long-term carrying capacity compared to pre-harvest conditions. Most of the area covered under this proposal is located in productive old-growth forests within Admiralty Island National Monument and Kootznoowoo Wilderness.

Population Information

McCoy (2017) outlines the limitations of estimating deer populations, while Bethune (2020) discusses the most recent deer population status in Unit 4. Overall, the deer population in Unit 4 has recovered from the mortality incurred during the severe winters of 2006-2008 and is probably reaching winter carrying capacity in some areas. There have not been any significant mortality events recorded since 2008 and recent winters have been mild with no significant snowfall.

While no pellet surveys have been recently conducted in the proposal area, surveys in other portions of Unit 4 have shown increases from prior years (McCoy 2019). Pellet counts conducted in 2019 in Pybus Bay, on the eastern side of Admiralty Island, increased by 106% from the previous survey in 1998, and surveys in other nearby Unit 4 areas surveyed (Pavlof Harbor and Kelp Bay) also indicated increasing populations.

ADF&G also conducts aerial surveys during summer in alpine habitat. Between 2014 and 2016, five aerial surveys were conducted on Admiralty Island with increasing results (**Figure 2**. Number of deer observed during five aerial surveys on Admiralty Island. (Lowell and Valkenburg 2017)**.,** Lowell and Valkenburg 2017). The metrics specific to Admiralty Island were highest of all survey areas in Unit 4 (**Figure 3**).

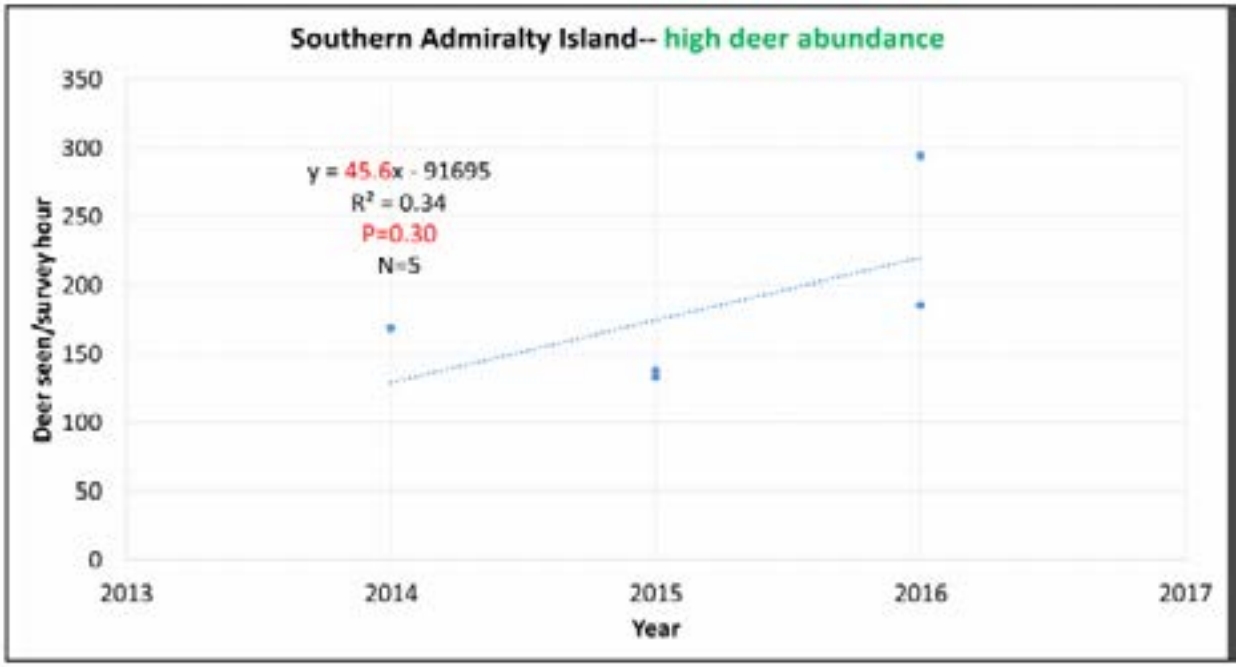

Figure 2. Number of deer observed during five aerial surveys on Admiralty Island. (Lowell and Valkenburg 2017).

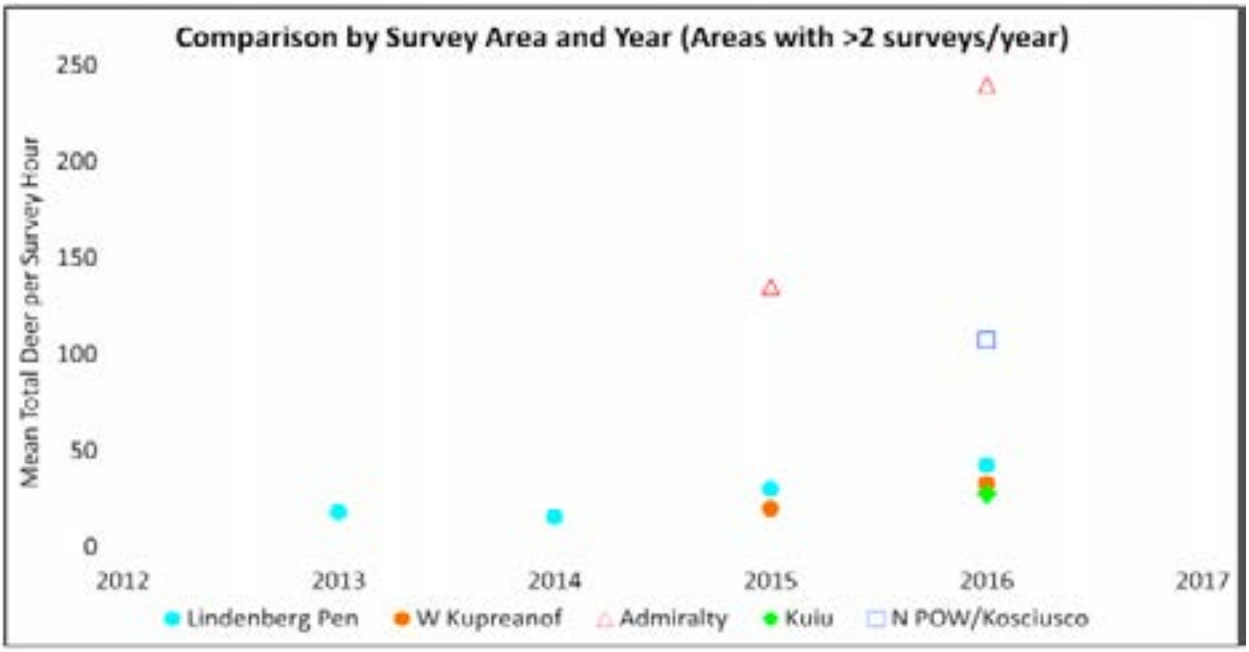

Figure 3. Average number of deer observed per hour during aerial alpine surveys in Southeast Alaska. (Lowell and Valkenburg 2017).

Cultural Knowledge and Traditional Practices

Deer are an important subsistence resource for rural residents throughout southeast Alaska. In a 2012 survey of Angoon residents, 49% of households reported attempting to harvest deer, 45% of households reported successfully harvesting deer, and 84% of households reported using deer (Sill and Koster 2017). An estimated 218 deer were harvested, for a total of 17,452 pounds, or 51 pounds per capita. The deer hunting areas documented in the survey ranged from Cube Cove to Whitewater Bay on Admiralty Island, and the Peril Strait areas of Baranof and Chichagof Islands (Figure 4. Reported deer hunting locations used by residents of Angoon. From Sill and Koster 2017.).

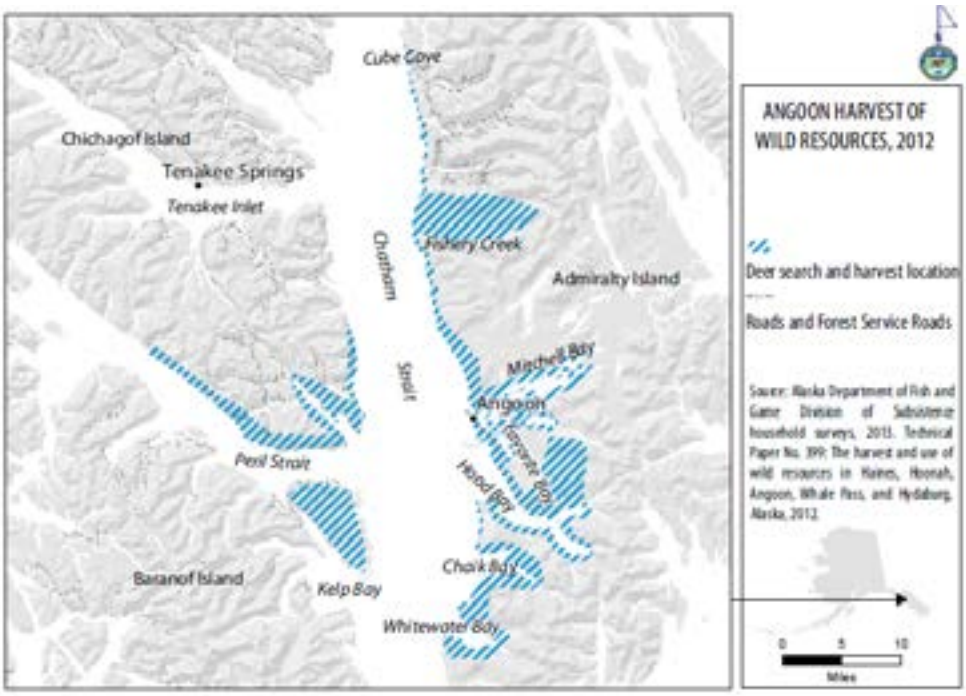

Figure 4. Reported deer hunting locations used by residents of Angoon. From Sill and Koster 2017.

The population of Angoon has been on a steady decline over the past two decades. In the 2000 census, the population was 572, dropping to 459 in the 2010 census, and was estimated at 404 in July 2019, a 30% decline over that time period (Robinson 2020). Angoon and nearby communities maintain strong ties to Juneau as a commercial and economic hub, and many rural residents of the area move to Juneau for economic opportunities. Based on year-to-year changes in residency of Permanent Fund Dividend applicants, an average of 61 residents of the Hoonah-Angoon census area moved to Juneau each year between 2009 and 2020, while an average of 47 moved from Juneau to the Hoonah-Angoon census area (Alaska Department of Labor and Workforce Development 2021).

Harvest History

The harvest data reported below is based on both mail-out surveys (pre-2011) and returned harvest reports (2011 and later) (ADF&G 2021, Bethune 2020). The overall average reporting rate is about 60-70% but may be much lower in some small rural communities. To account for hunters who did not report, data are proportionally expanded by community size. If the response rate is low within a community, a small number of hunters may have a disproportionate effect on the data. As confidence intervals are not available for these data, harvest numbers should be considered estimates and used with caution. Trends observed, especially at larger scales, are more likely to be indicative of general population change, however.

Harvest data from 2000 through 2019 were used to evaluate the deer harvest patterns and trends within the portion of western Admiralty Island addressed by the proposal the "proposal area." Harvest and effort were grouped by Wildlife Analysis Area (WAA), which roughly corresponds to major watersheds or other distinct geographic areas. Since effort was calculated by WAA, individual hunters using multiple WAAs in a regulatory year may be counted multiple times and over-represented in calculations. The WAAs used

to represent the proposal area for the purposes of this analysis are displayed in Figure 5. Wildlife Analysis Areas within the WP22-07 analysis area..

The amount of hunter effort in the proposal area, as measured by numbers of hunters and hunter-days, stayed relatively stable between 2000 and 2019 (Figure 6. Number of Federally qualified and non-Federally qualified users using the proposal area, 2000-2019., Figure 7. Number of hunter-days by Federally qualified and non-Federally qualified users within the proposal area, 2000-2019.). Most of the effort is from non-Federally qualified users, mostly from Juneau, and represented 68% of the hunters and 74% of the hunter-days. The remaining 32% of hunters and 26% of the hunter-days are from Federally qualified subsistence users, the majority residing in Angoon.

Juneau residents comprised 52% of the hunter-days between 2000 and 2019, and Angoon residents comprised 29% (ADF&G 2021). Nonresident effort is low, representing only 2% of the hunter days. Angoon is the only community within the proposal area, and about 65% of the deer hunting effort and harvest by Angoon residents occurs within the proposal area. Most of Angoon's remaining hunting effort and harvest takes place on the east coast of Chichagof and Baranof Islands, across Chatham Strait from Angoon.

Two measures were used to assess the success rate of hunters over this time period: days hunted per deer harvested, and deer harvested per hunter. Between 2000 and 2019, the number of days it took to harvest a deer remained fairly constant (Figure 8. Number of days hunted per deer harvested by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.). Federally qualified subsistence users required fewer days to harvest a deer compared to non-Federally qualified users, however. The number of deer harvested per Federally qualified subsistence user declined between 2006 and 2009 but has remained relatively stable since then (Figure 9. Number of deer harvested per hunter by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.). Since 2009, the number of deer harvested per hunter has been roughly similar between Federally qualified and non-Federally qualified users.

The total number of deer harvested in the proposal area by both Federally qualified and non-Federally qualified users has varied over the years, likely due to changes in deer abundance (**Figure 10**. Number of deer harvested by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.). Most years, non-Federally qualified users harvested more deer from the proposal area due to the larger number hunters. Some of the variability in the harvest by Federally qualified subsistence users may be due to shifts in hunting locations. In recent years, the overall number of deer harvested by Angoon residents has remained relatively high, but a larger proportion has been taken from outside the proposal area, or from unknown locations (**Figure 11**. Total number of deer harvested by Angoon residents, by harvest location, 2000-2019.).

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 during the month of January, as well. Most harvest occurs later in the season, as snow forces deer to lower elevations where they are easier to harvest. Nearly half (45%) of the harvest in Unit 4 occurs during the month of November; and 67% occurs from September through November (Table 1. Percentage of Unit 4 deer harvest by month and user type, 2000-2019.). Data are available monthly, so the proportion of deer taken before and after September 15 could not be calculated.

Figure 5. Wildlife Analysis Areas within the WP22-07 analysis area.

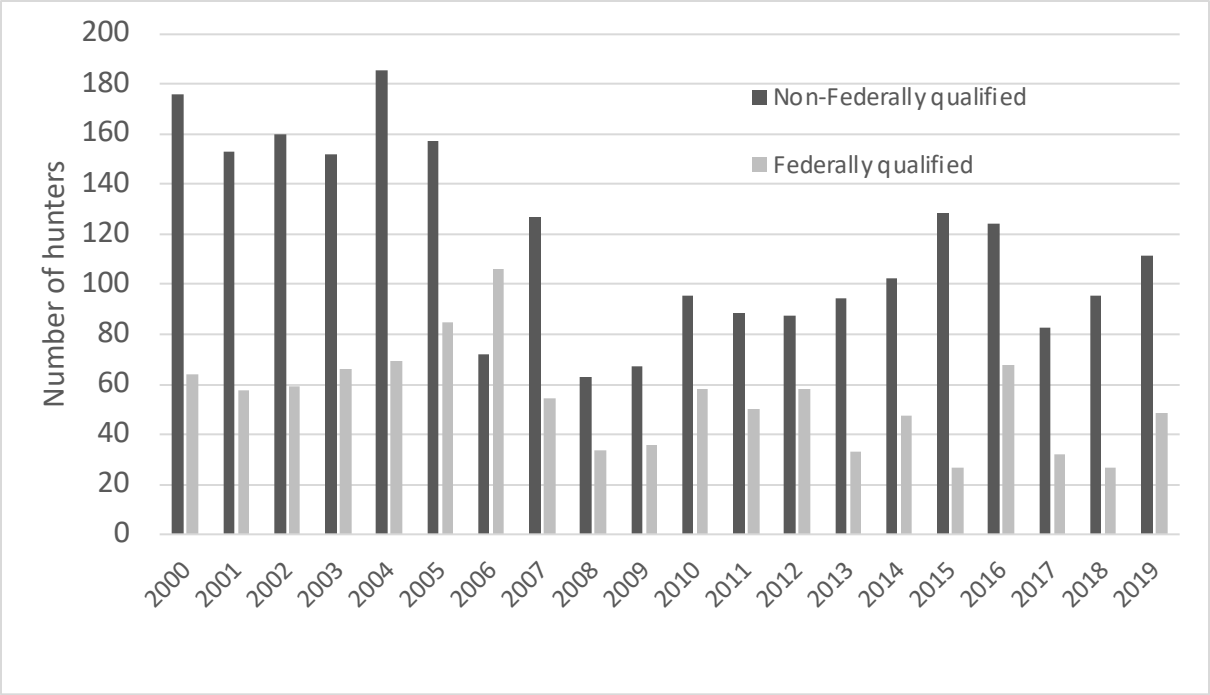

Figure 6. Number of Federally qualified and non-Federally qualified users using the proposal area, 2000-2019.

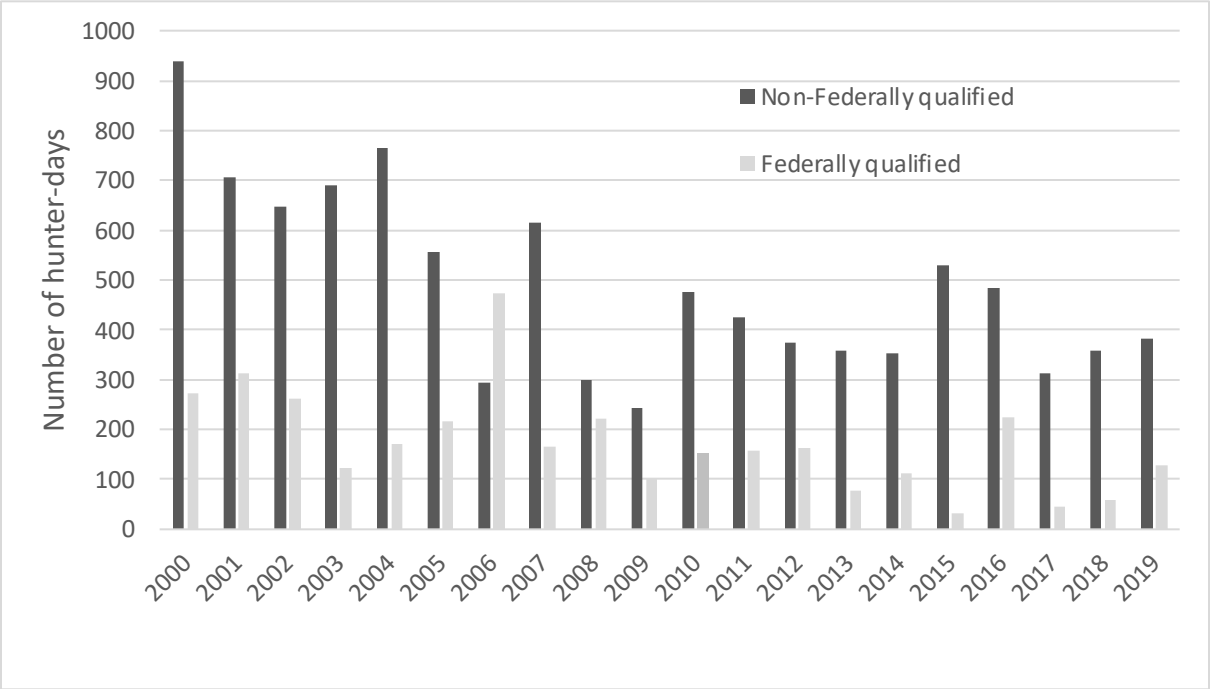

Figure 7. Number of hunter-days by Federally qualified and non-Federally qualified users within the proposal area, 2000-2019.

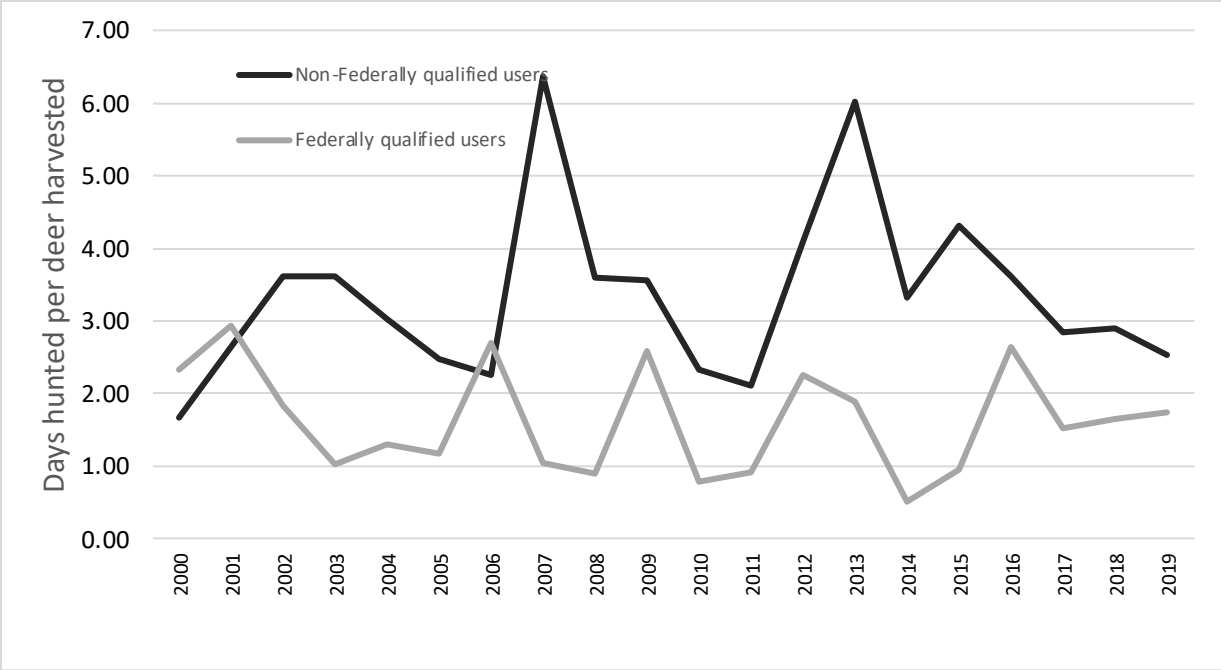

Figure 8. Number of days hunted per deer harvested by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.

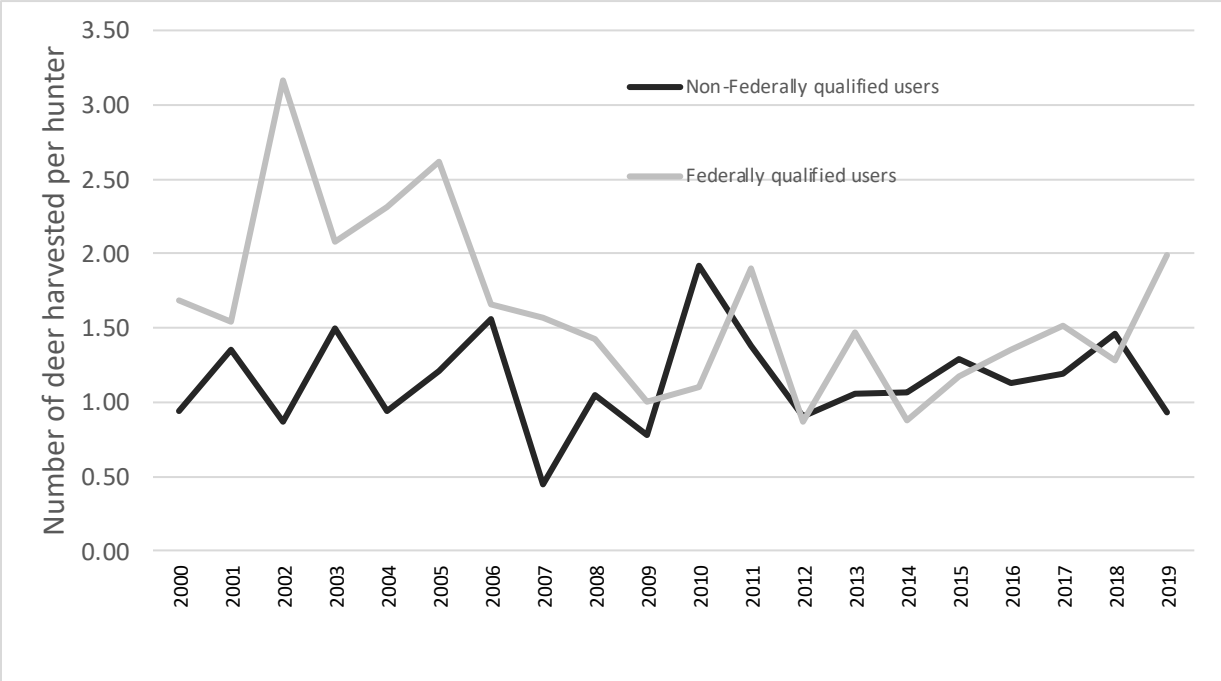

Figure 9. Number of deer harvested per hunter by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.

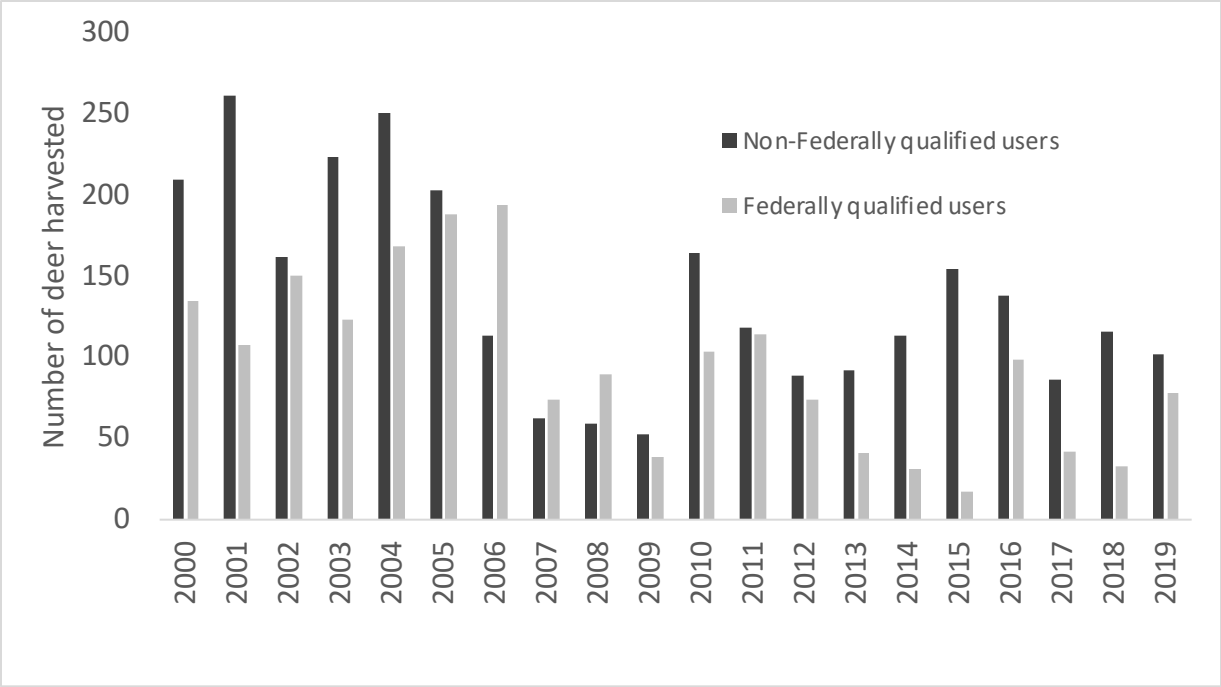

Figure 10. Number of deer harvested by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.

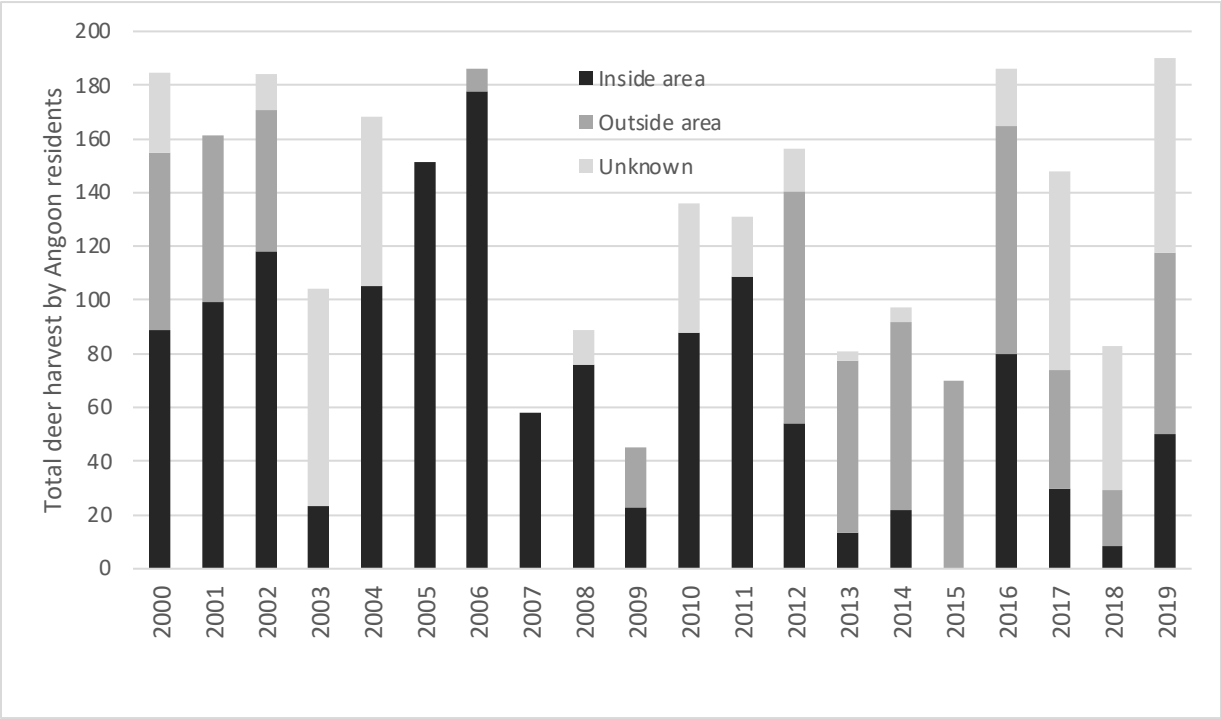

Figure 11. Total number of deer harvested by Angoon residents, by harvest location, 2000-2019.

Table 1. Percentage of Unit 4 deer harvest by month and user type, 2000-2019.

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

Other Alternatives Considered

A reduction of the bag limit for non-Federally qualified users in the proposal area would reduce harvest and may reduce competition between non-Federally qualified and Federally qualified subsistence users. However, relatively few hunters harvest the full bag limit, and with high deer abundance a bag limit reduction would likely have a negligible effect on the success rate of Federally qualified subsistence users and may represent an unnecessary restriction on non-Federally qualified users, which is contrary to Title VIII of ANLCA.

Another alternative is to reduce the extent of the closure area. Reducing the closed area to the Angoon Area WAA (roughly the Mitchell Bay drainages) would displace fewer non-Federally qualified users while still reducing competition between user groups in Angoon's most heavily used deer hunting area. However, even with a reduced area, the proposal may not meet the criteria for a closure to non-subsistence uses under ANILCA Section 815(3). Deer populations in the area are healthy, and there is little evidence that Federally qualified subsistence users are having trouble meeting their needs for deer.

Effects of the Proposal

This proposal would restrict non-Federally qualified users hunting deer on portions of Admiralty Island during the months of peak effort and harvest. Currently, non-Federally qualified users represent roughly 60-70% of the hunting effort and harvest in the proposal area, which is comprised almost entirely of Federal public lands. The proposed September 15 - November 30 closure for non-Federally qualified users would likely eliminate over half of the hunter effort and harvest of deer in the proposal area. Non-Federally qualified users would likely shift their effort to other areas of Unit 4, leading to increased competition with hunters in these other areas. It could also lead to increased effort in the proposal area during the month of December, after the closed period has ended.

The intent of the proposal is to increase opportunity for Federally qualified subsistence users by limiting competition from non-Federally qualified users. However, there is little evidence that the proposed regulation would provide much benefit for Federally qualified subsistence users. Deer populations within the proposal area appear to be healthy and close to carrying capacity and, therefore, the elimination of a substantial portion of the harvest is unlikely to result in a significant increase in the deer population. In addition, if a population increase did occur it could result in the population exceeding its carrying capacity, especially on winter range during years with severe winters, which could negatively affect future Federal subsistence harvest opportunity.

While the proponent states that subsistence users have had trouble meeting their deer needs due to increased competition from non-Federally qualified users, the effort levels, success rates, and total harvest for all hunters in the proposal area have been stable. The harvest data does not indicate any recent

increase in the amount of hunting effort or harvest by non-Federally qualified users, at least over the time period for which data is available. It also shows that within the proposal area, the number of days required to harvest a deer and the number of deer harvested per Federally qualified subsistence user have been fairly consistent for over a decade.

Since there does not appear to be any significant change in the deer harvest and hunting effort by Federally qualified subsistence users in the proposal area, and deer populations in the area are healthy, competition from non-Federally qualified users does not appear to have reduced subsistence uses of deer in the proposal area. However, the perception that Federally qualified subsistence users are experiencing more competition may stem from increases in encountering other hunters, or other user conflicts that are not captured in harvest and effort data. The proposed regulation would reduce the number of such conflicts.

The proposal may also have the unintended consequence of preventing non-Federally qualified users with local ties to the area from participating in subsistence activities. Many people from Angoon and other rural areas move to Juneau to seek employment but return to these communities to participate in subsistence harvesting with family and friends. Under the proposed regulation, these users would be prevented from hunting deer in the area during the closed season.

OSM CONCLUSION

Oppose Proposal WP22-07

Justification

Section 802(2) of ANILCA requires that subsistence uses by rural residents of Alaska shall be "the priority consumptive uses of all such resources on the public lands of Alaska." Section 804 provides a preference for subsistence uses, specifically "…the taking on public lands of fish and wildlife for nonwasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes." Section 815(3) provides that the Board may restrict non-subsistence uses on Federal public lands if "necessary for the conservation of healthy populations of fish and wildlife" or "to continue subsistence uses of such populations."

Based on available data, hunting effort and harvest success rates of subsistence users have been stable and favorable over the last 20+ years, suggesting that the closure is not necessary to continue the subsistence uses of the deer population. Deer populations within the area are healthy and there is no conservation concern for deer on the west coast of Admiralty Island, indicating a closure is not necessary for conservation reasons. Thus, the proposed regulation does not meet the criteria identified in Section 815(3) of ANILCA for a closure or restriction of non-subsistence uses.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Southeast Alaska Subsistence Regional Advisory Council

Support WP22-07 **with modification** to remove wildlife analyses areas 4044 and 4043 from the proposed closure area.

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*
Drainages of Admiralty Island flowing into Chatham Strait between Fishery Point and Point Gardner, except drainages flowing into Thayer Lake, Hasselborg Lake, and Hasselborg Creek are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users.	

Harvest data have shown a decline in deer harvest by subsistence users, and the local Council member testified that Angoon residents are having a hard time getting deer. The decrease in competition from other non-Federally qualified users will be beneficial to subsistence users. The proposed closure is not necessary for conservation purposes, but it will be necessary to ensure continued subsistence uses by residents of Angoon whose harvest levels have fallen in recent years. The Council found that the proposal is consistent with established fish and wildlife management principles in that it uses a change in hunting seasons for some users as a tool.

The Council removed sections from the originally proposed closure area that had the highest rates of use by non-Federally qualified users. The intent of the modification was to reduce the impact of the closure on those users. The Council acknowledged that wildlife analysis areas could not be used in Federal regulation and requested that OSM develop modified regulatory language to reflect the Council's intent. The original and modified closure areas are shown in **Figure 12**.

Figure 12. The original (within black outline) and modified (with cross-hatching) proposed closure area.

INTERAGENCY STAFF COMMITTEE COMMENTS

The ISC acknowledges the extensive discussion by the Council members about the closure policy application to this situation. This was one of four proposals for Unit 4, which overall has a healthy population of deer, but is experiencing subareas where subsistence users are not able to harvest enough deer for their needs. The Council submitted this proposal because of concerns brought to them by the affected Federally qualified subsistence users in Angoon about not meeting subsistence needs for deer. The proposal review process allowed them to review the available data and hear testimony from all affected users of the resources. During the meeting, they acknowledged that the data in the State reporting system used to measure effort does not reflect success in subsistence hunting because subsistence hunting of deer is opportunistic and users generally only report when they are successful. They crafted a modification in area and season that limits the impacts to the non-Federally qualified users and addresses the needs of subsistence users.

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

Wildlife Proposal 22-07

This proposal would close federal public land draining into Chatham Strait between Point Marsden and Point Gardner to deer hunting by non-federally qualified users (NFQU) from September 15 – November 30 (**Figure 1**). Federally qualified users (FQU) could continue to hunt in this area August 1 through January 31.

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

Background

The Southeast Alaska Subsistence Regional Advisory Council (SERAC) claims that NFQUs are unfairly competing with FQUs when hunting Sitka black-tailed deer and seeks to change the federal hunting regulations in Game Management Unit (GMU) 4.

GMU 4 encompasses the ABC Islands (Admiralty, Baranof, and Chichagof) and the surrounding archipelago. Hunters residing in Southeast Alaska (GMUs 1-5) excluding 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 to January 31 with a bag limit of 6 deer (bucks only August 1 – September 14). The current State season is August 1 to December 31 with a bag limit of 6 deer (bucks only August 1 – September 14). In 2019, the Alaska Board of Game (BOG) increased the deer bag limit in GMU 4 from 4 to 6 deer because there is such a healthy population of deer within this GMU.

The BOG has made a positive customary and traditional use finding for deer in GMU 4 and established an annual amount reasonably necessary for subsistence (ANS) for deer in GMU 4 of 5,200-6,000 deer. ANS differs from the undefined term “subsistence need” used in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Under Alaska law ANS is the harvestable portion of a game population that is sufficient to provide a reasonable opportunity for subsistence uses. “Reasonable

opportunity" is that which allows a normally diligent hunter a reasonable expectation of success. The BOG establishes an ANS for a game population through review of long-term population and harvest information. A portion of the state-designated Juneau Nonsubsistence Area extends into GMU 4 on northern and eastern Admiralty Island.

The indices of deer abundance, deer hunter effort, and harvest in GMU 4 are all important aspects to consider when reviewing the validity of this proposal. Deer abundance trends are derived from annual deer pellet group transects, aerial alpine surveys, and spring mortality surveys. Hunter effort and harvest 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 & Game (ADF&G) are the only annually collected, objective, and quantitative information on deer abundance, hunter effort, and harvest available for Southeast Alaska.

GMU 4-Wide Population and Harvest

Monitoring deer abundance in forested habitat is challenging as deer cannot be directly counted through ground or aerial surveys, so we currently look at several types of survey data. Since the 1980s ADF&G has used spring pellet group counts to monitor broad (>30%) changes in deer abundance. Spring pellet group surveys are conducted in numerous US Forest Service Value Comparison Units across Southeast Alaska after snow melts and before spring green-up.

GMU 4 consistently has the highest pellet group counts in Southeast Alaska (**Figure 2**). Pellet group counts <1.0 group/plot generally correspond to low density populations, 1.0 – 1.99 group/plot to moderately dense populations and > 2.0 group/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. Although the specific area affected by this proposal is rarely sampled, this broad index of deer abundance suggests the GMU 4 population remains at high levels with no indication of depleted populations or conservation concerns.

In 2013, ADF&G began evaluating mid-summer aerial counts of deer in alpine habitat as an index of deer abundance. Surveys were conducted for 2 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. Estimates from Northeast Chichagof were similar to Prince of Wales Island (POW) and higher than all other survey areas except Southern Admiralty and POW.

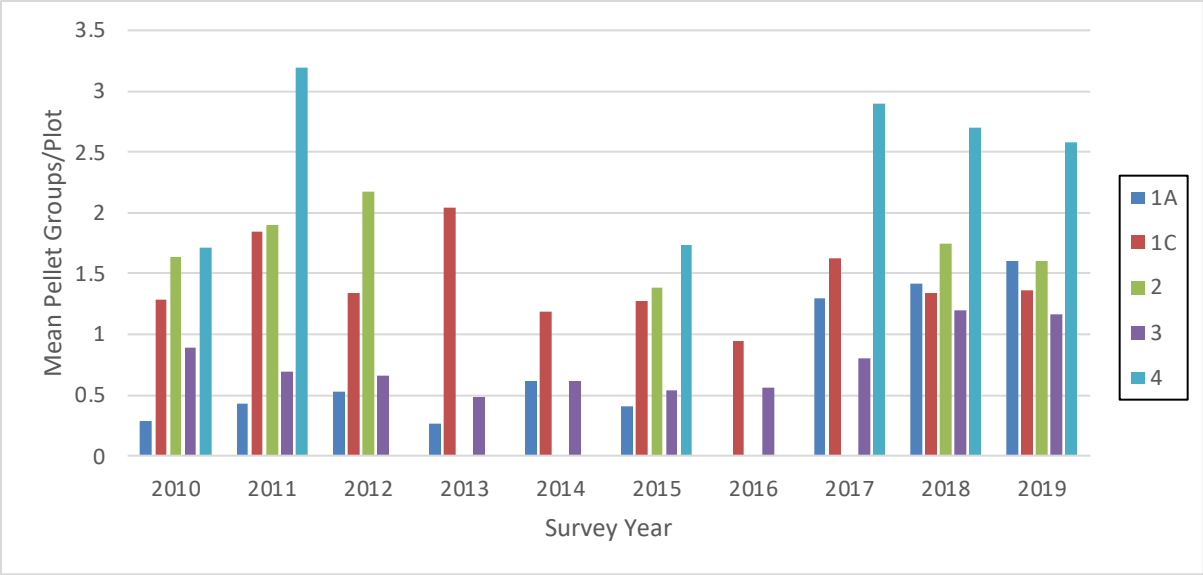

Figure 2. Mean number of deer pellet groups/plot for Southeast Alaska by GMU, 2010-2019.

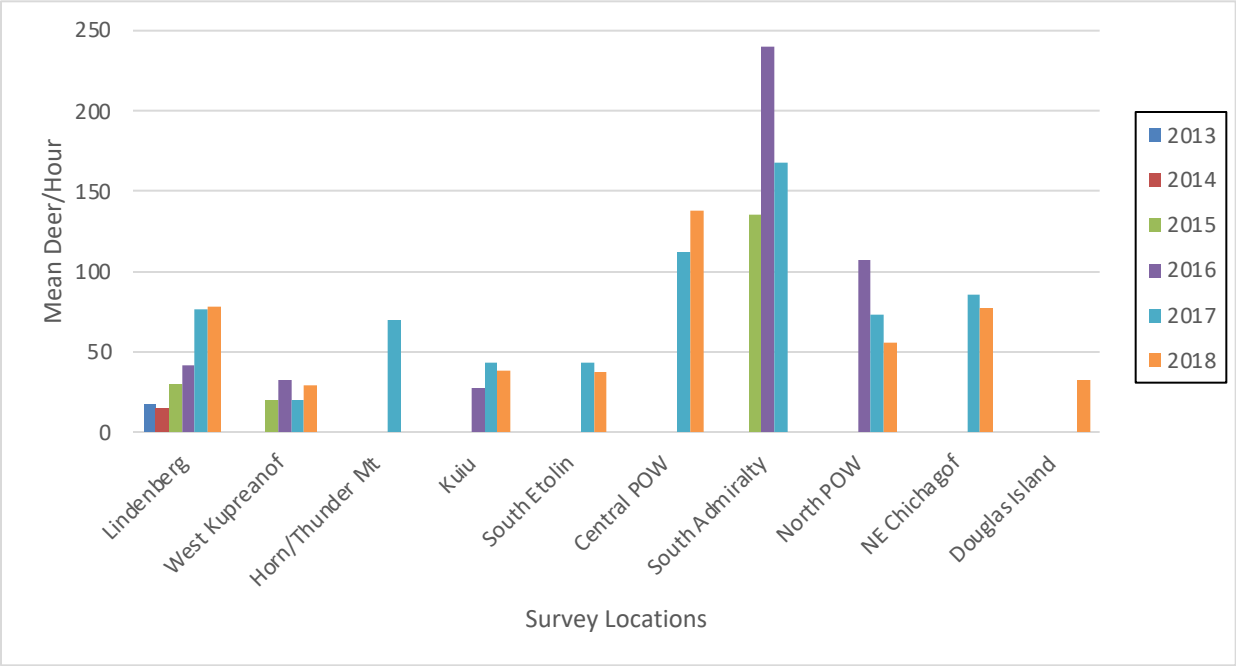

Figure 3. Mean number of deer counted per hour during mid-summer aerial alpine deer surveys in Southeast Alaska, 2013-2018.

Management biologists in GMU 4 began conducting beach mortality transects in the early 1990s. Although these mortality surveys are a relatively insensitive indicator of population trend, they are an indicator of mortality resulting from severe winters 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 adult male, adult female 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 very high number of carcasses

found during spring 2007 surveys (**Figure 4**). In the years since then, few carcasses were found indicating high overwinter survival and no winter related population declines.

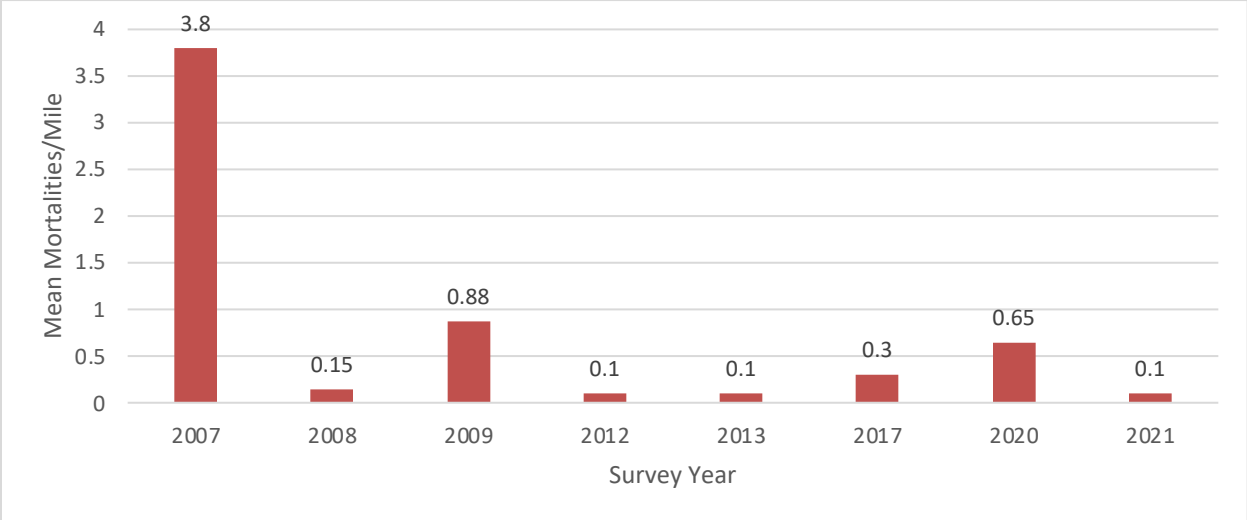

Figure 4. Mean number of mortalities per mile of beach surveyed in GMU 4.

Taken together, these indices of deer abundance (pellet group surveys, alpine counts, mortality transects) suggest 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 deer population.

Hunter Effort and Harvest

GMU 4 managers also use harvest as an indicator of trend in the deer population. ADF&G estimates hunter effort and harvest using information provided by hunters. 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 deer they harvested.

Since 1997 the estimated average annual harvest in GMU 4 has been 5,643 deer taken by 3,275 hunters (**Figure 5**). Currently, GMU 4 supports the highest deer harvest in the state with harvest remaining fairly stable with between 5,000-7,000 deer harvested annually. The exception being the severe winter of 2006/2007 when high harvest was followed by significant overwinter mortality of deer throughout GMU 4. This resulted in a precipitous decline in harvest from 7,734 deer in 2006 to 1,933 deer in 2007. Based on harvest and other indicators of deer abundance, managers believe the deer population had fully recovered by the 2013 season.

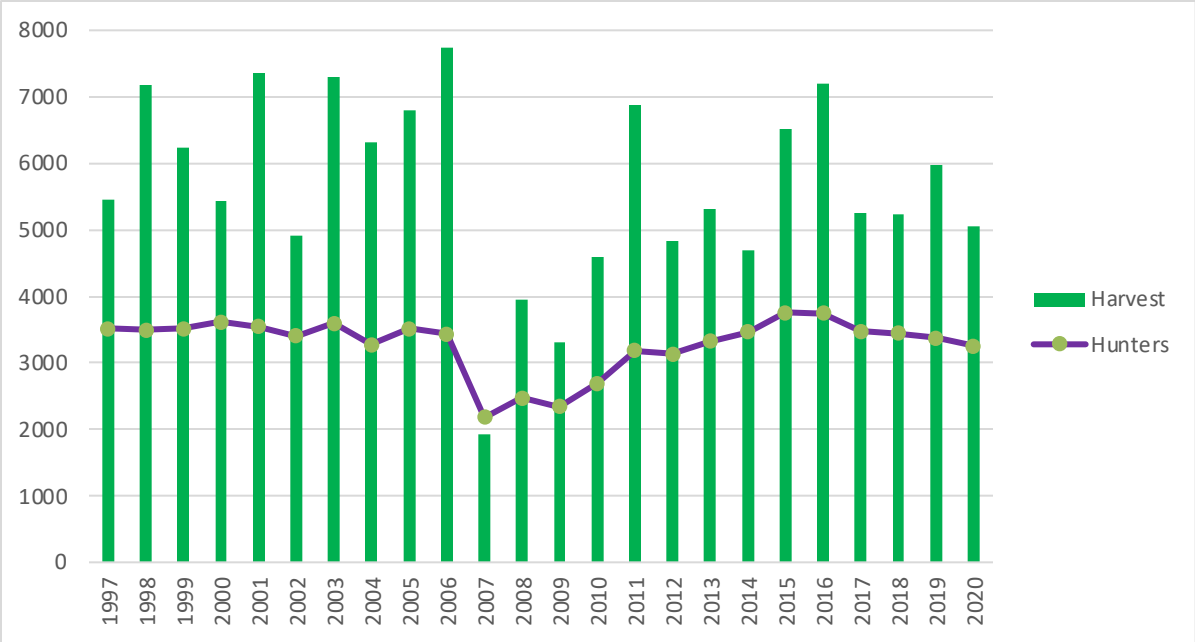

Figure 5. Numbers of people hunting deer and estimated deer harvest for GMU 4, RY97-RY20**.**

Data Summaries for the Impacted Area

The following analyses present data summarized for FQUs and NFQUs in the 6 ADF&G Wildlife Analysis Areas (WAAs 4041-4044, 4054 and 4055) that intersect with the area this proposal covers (Figure 1). WAA boundaries generally correspond with watersheds and are the finest scale at which data can be meaningfully summarized. For this proposal, WAA boundaries directly correspond to the proposal area.

Long-term records indicate a declining trend in harvest for both FQUs and NFQUs (**Figure 6**). From 1997 to 2006, FQUs harvested on average 157 deer annually. Harvest declined with the severe winter of 2006/2007. Since 2013, when ADF&G considered the deer population recovered, FQUs have harvested an average of 56 deer annually. This represents an approximate 65% decline. There is a similar pattern for NFQUs, who averaged 200 deer annually from RY97 to RY06. Since RY13, that average has declined to 119 deer annually.

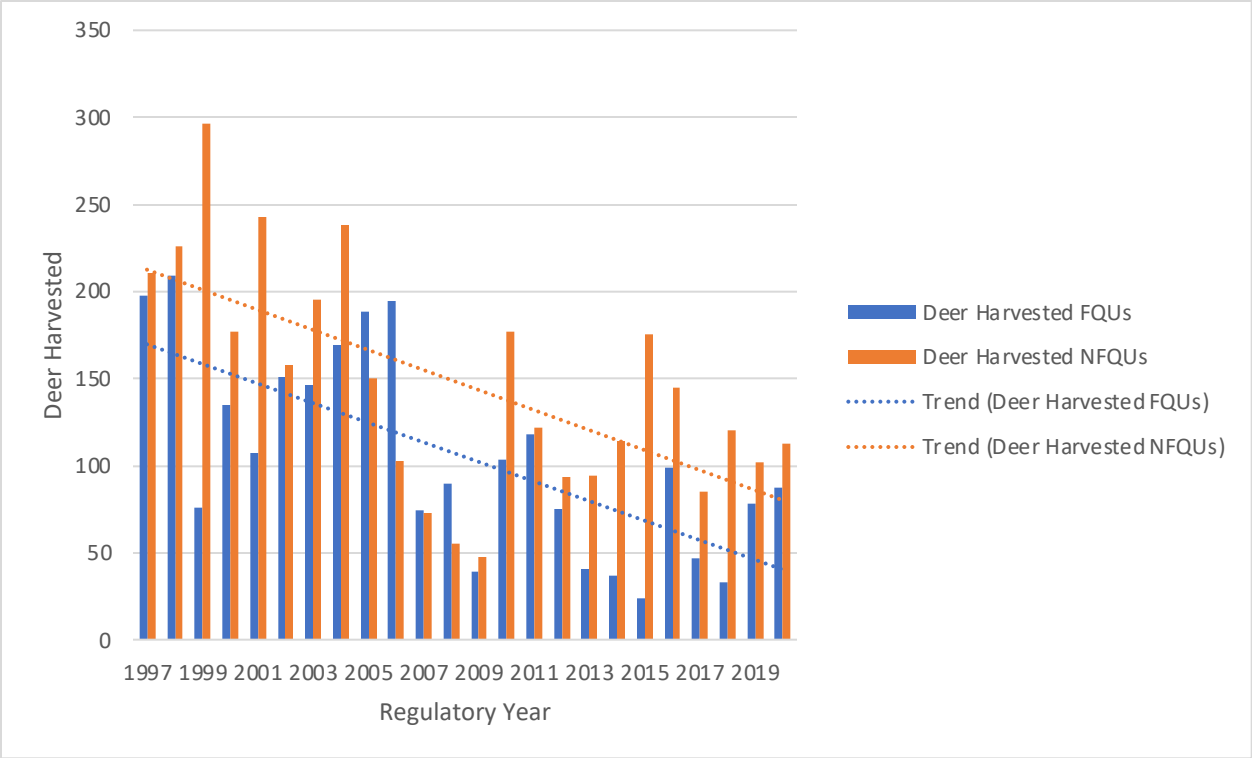

Figure 6. Trends of estimated deer harvest by FQU and NFQUs, western Admiralty Island, RY97-RY20.

To evaluate potential reasons for the decline in deer harvest we examined trends in the numbers of FQU and NFQU hunters and days of hunting effort by those hunters. Since 1997, the number of FQUs and NFQUs have both declined (Figure 7). From 1997-2006 the number of FQUs averaged 72 hunters and NFQUs averaged 143 hunters. 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 recovered. From 2013-2020 the numbers of FQUs averaged only 37 hunters, a decline of approximately 50 percent. For that same period the number of NFQUs averaged 101 hunters, a decline of 30 percent.

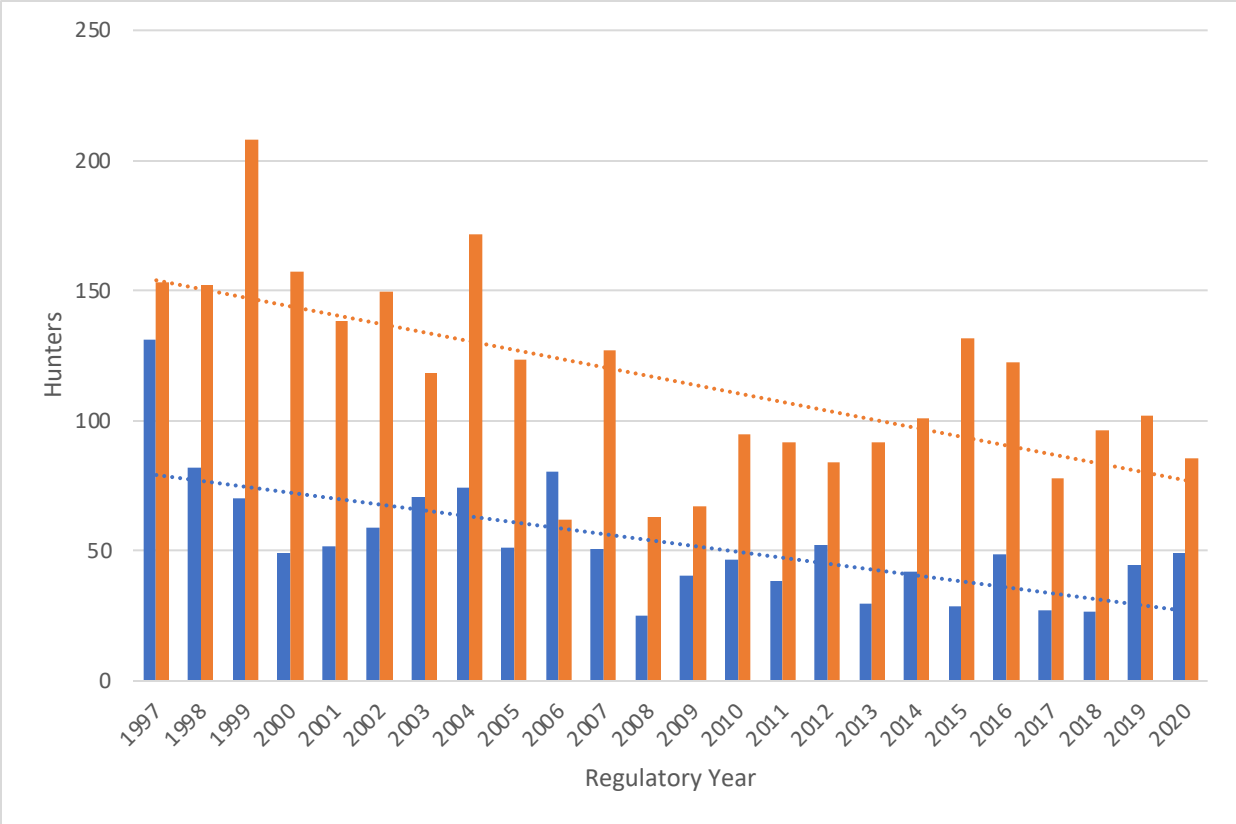

Figure 7. Trends in number of FQUs and NFQUs, western Admiralty Island, RY97-RY19.

In Angoon specifically, there has been an approximate 25% declining trend in the number of Angoon residents who have obtained deer harvest tickets (**Figure 8).**

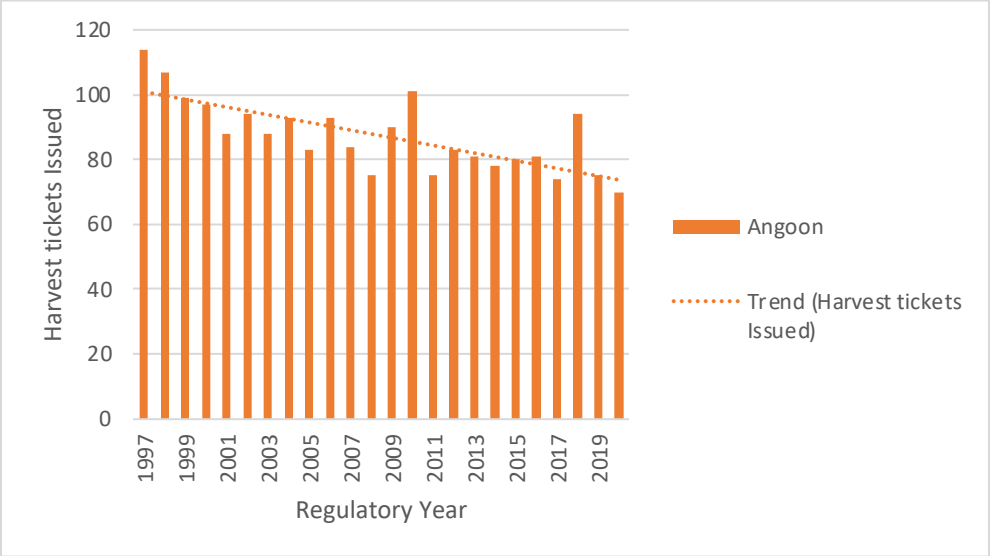

Figure 8. Deer Harvest Tickets Issued in Angoon RY97-RY20

Trends in days hunted are similar to trends for number of FQUs and NFQUs (**Figure 9**). Days of hunting effort by FQUs and NFQUs both declined, but the decline for FQUs has been greater. FQUs spent as

many as 630 days afield in RY97 and as few as 39 days in RY15. Decreasing numbers of hunters and days hunted indicate reduced effort for both NFQU and FQUs for this area of GMU 4.

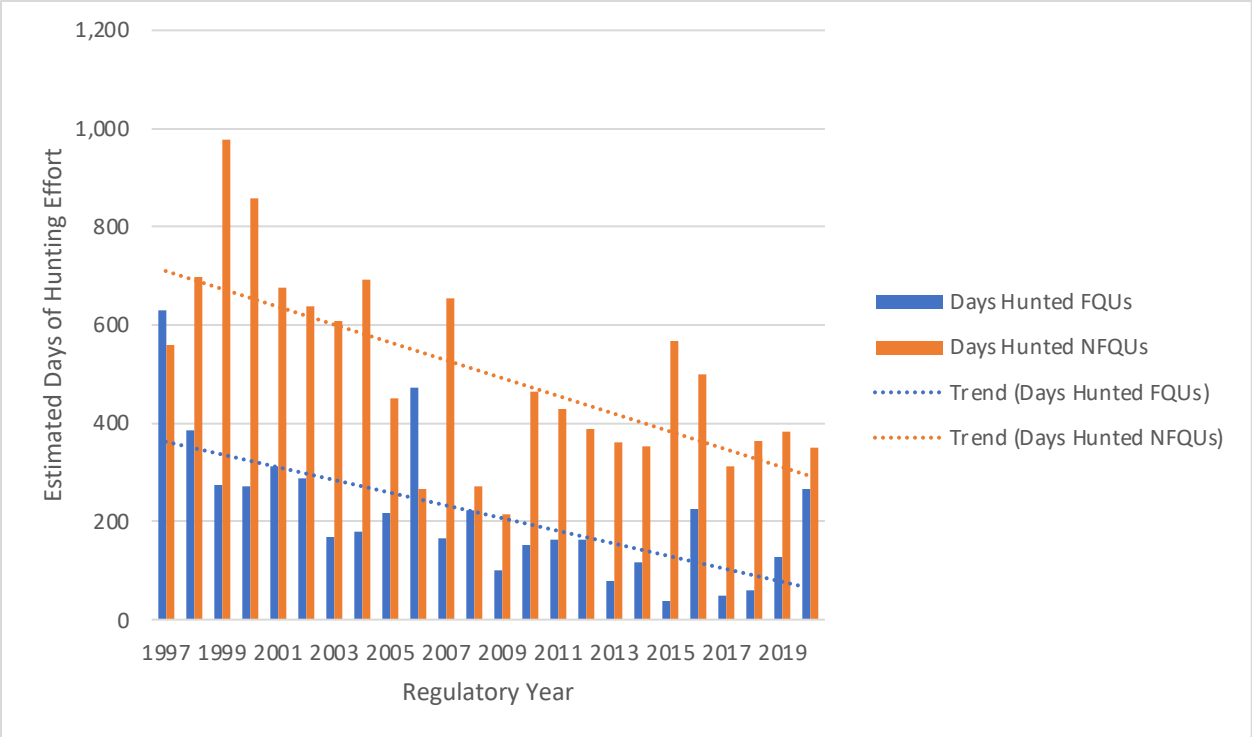

Figure 9. Trends in estimated days of hunting effort by FQUs and NFQUs, western Admiralty Island, RY97-RY20.

Trends in Hunter Efficiency

Hunter efficiency, or the days of hunting effort required to harvest 1 deer, is another indicator of the availability of deer to GMU 4 hunters. FQUs are consistently more efficient than NFQUs in time it takes to harvest a deer (**Figure 10**). Since 1997 FQUs hunting in the proposal area have required an average of only 2.0 days of hunting effort to harvest 1 deer, whereas NFQUs have required 3.4 days of effort.

Deer hunting in GMU 4 is extremely efficient compared to deer hunter effort required to harvest a deer elsewhere in the state. In comparison, hunters on Prince of Wales Island (GMU 2) average 4.0 days of hunting per deer harvested, Kodiak (GMU 8) averages 3.6 days/deer, GMU 1A (Ketchikan) averages 5.0 days/deer, GMU 3 (Petersburg/Wrangell) averages 6.1 days/deer, GMU 6 (Prince William Sound) averages 3.0 days/deer and in GMU 1C (Juneau) hunters average 7.9 days/deer (ADF&G 2013-2020). The effort required to harvest one deer in GMU 4 (2.4 days/deer) is lower than anywhere in Alaska.

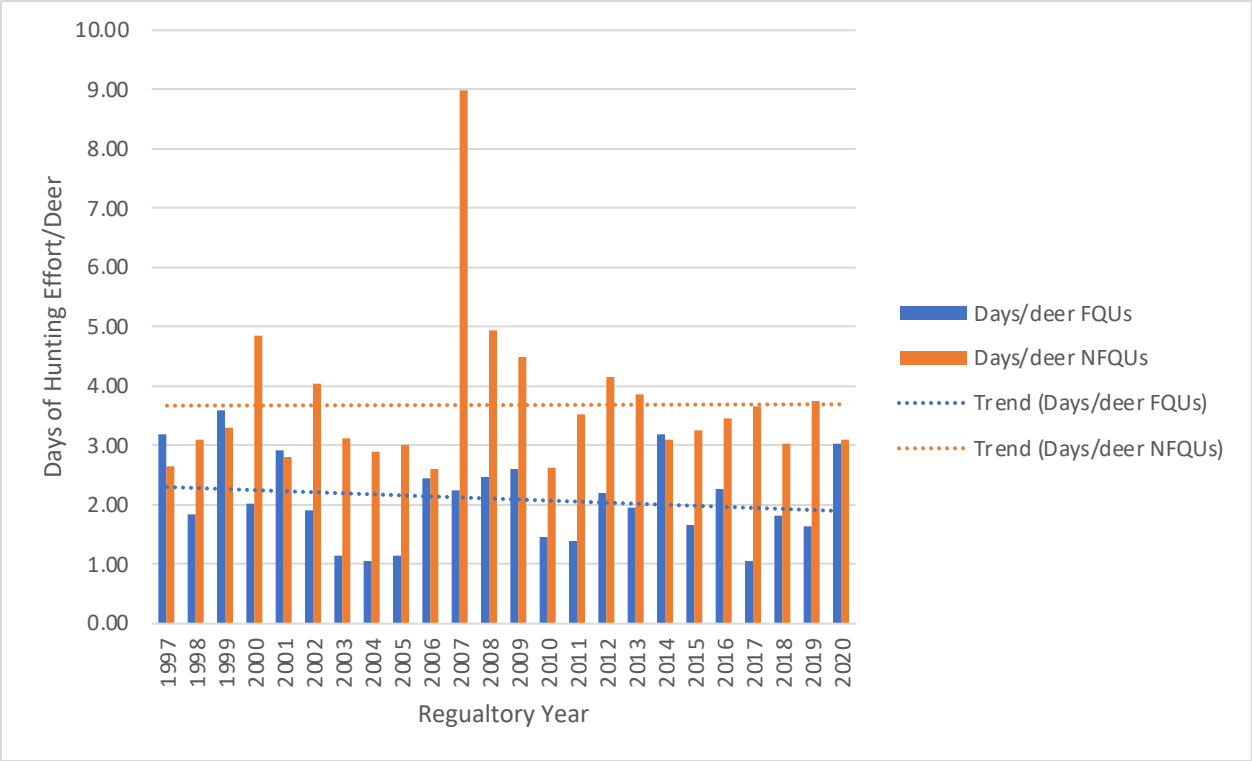

Figure 10. Trends in estimated days of hunting effort required by FQUs and NFQUs to harvest one deer, western Admiralty Island, RY97-RY20.

The number of deer harvested per hunter is another gauge of deer abundance and hunting success. Over the long term this metric has declined for both groups of hunters with the decline for FQUs greater than for NFQUs. However, since RY13 when ADF&G considered the deer population recovered from the severe winter of 2006/2007, the number of deer harvested per NFQU has remained steady and averaged about 1.25 deer/hunter. In contrast, the number of deer harvested per FQUs has trended upwards suggesting that FQUs are experiencing increasing success (**Figure 11**).

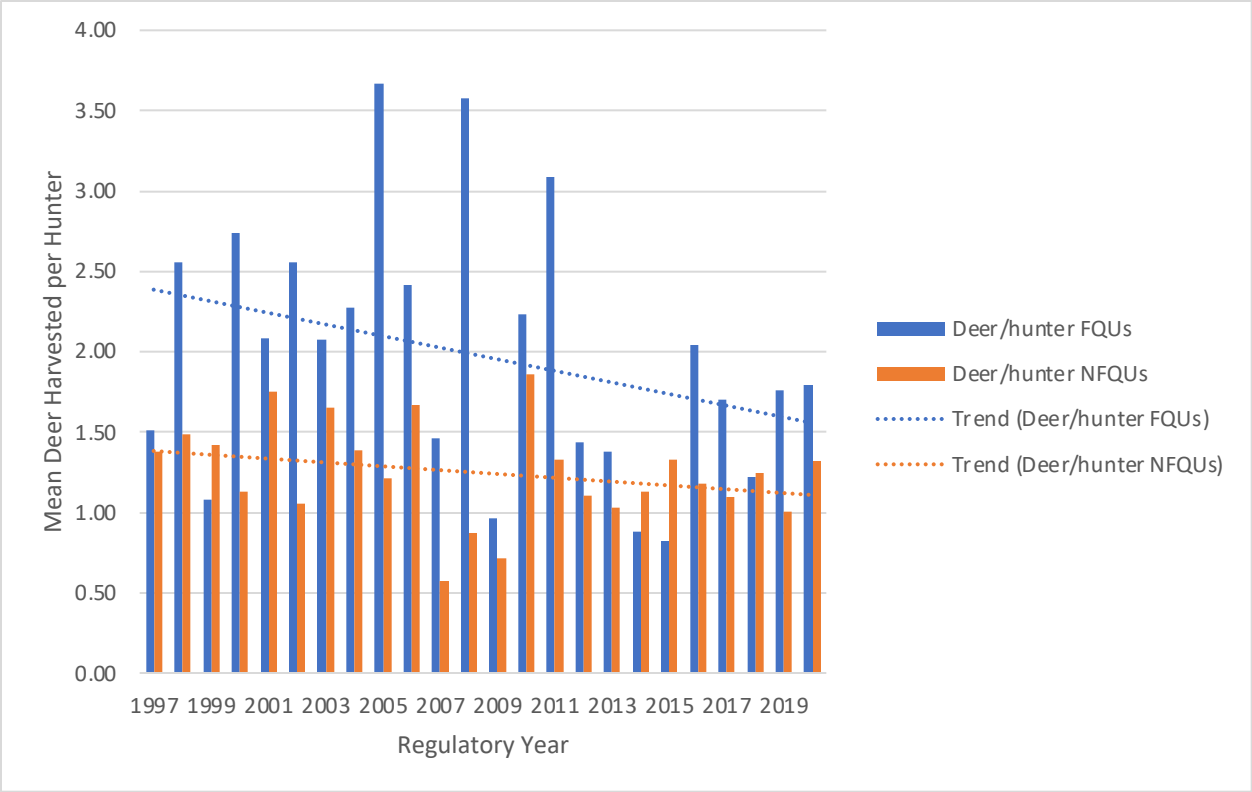

Figure 11. Trends in mean numbers of deer harvested per FQU and NFQU hunters, western Admiralty Island, RY97-RY20.

Hunt Chronology

Mid-October through November 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. Hunters report hunting effort and harvest by month, so data can only be summarized by month. The period, September – November, encompasses 64% of hunters, 67% of days hunted, and 64% of the harvest for FQUs hunting in Unit 4. Figures for NFQUs are slightly higher at 70%, 76% and 72% respectively (Table 1).

Table 1. Unit 4 Deer Hunting Chronology of Harvest and Effort for FQUs and NFQUs as both numbers and percentage of total.

FQUs RY11-RY20						
Month	**Hunters**	**%**	**Days Hunted**	**%**	**Deer Harvested**	**%**
August	**2,405**	**8**	**4,081**	**6**	**2,124**	**6**
September	**2,741**	**10**	**4,961**	**8**	**2,672**	**8**
October	**4,686**	**17**	**9,677**	**15**	**4,991**	**14**
November	**10,480**	**37**	**28,035**	**44**	**14,641**	**42**
December	**5,807**	**21**	**12,840**	**20**	**7,821**	**22**
January	**2,149**	**7**	**4,050**	**6**	**2,992**	**8**
Total	**28,268**		**63,644**		**35,241**	

NFQUs RY11-RY20						
Month	Hunters	%	Days Hunted	%	Deer Harvested	%
August	1,763	8	3,694	5	1,220	6
September	1,763	8	4,651	7	1,565	7
October	3,529	16	9,475	14	2,599	12
November	10,256	46	38,204	55	11,350	53
December	5,005	22	13,268	19	4,503	21
Total	22,316		69,292		21,237	

Analysis

The analyses presented here are based on several different metrics that came from the only annually collected, objective, and quantitative information available on deer abundance, hunter effort and harvest in the area affected by this proposal. Deer abundance data is not only gathered by ADF&G, but hunters report their effort and harvest to ADF&G, including the local residents of Angoon.

The proposal asserts that the deer population on western Admiralty Island is "depleted" and that in recent years FQUs have had difficulty meeting their subsistence needs for deer because of increasing competition with NFQUs. Because the term "subsistence need" is not defined and ANILCA does not require the federal program to quantify historical levels of harvest for subsistence uses, there is no way to objectively verify when those needs are being met. Our analysis focuses on measures of deer abundance and trend in GMU 4 and on trends in effort and harvest by FQUs and NFQUs in the proposal area. Conditions that would support the assertion that NFQUs are hindering deer harvest by FQUs would include increasing numbers of hunters, days of hunting effort, and harvest by NFQUs that coincide with declining harvest by FQUs while numbers and effort by FQU hunters remained stable or increased.

ADF&G monitors abundance and trend of deer at the scale of the GMU or subunit, so we can only note that the available data indicate GMU 4 deer populations are currently at high and stable levels. Winter severity, particularly deep and lingering snowpack, is the biggest limiting factor for Sitka black-tailed deer in GMU 4. The last winter with above average snowfall occurred in 2011/2012. Since then, winters have been average to mild with little overwinter mortality. Pellet group and aerial alpine deer counts also support the conclusion that deer remain abundant throughout GMU 4.

The proposal also asserts that FQUs on western Admiralty Island are having an increasingly difficult time meeting their subsistence needs. The term "subsistence need" as used in Title VIII of ANILCA has no quantitative benchmark analogous to ANS in state regulations. Consequently, there is no way of verifying whether the existing federal regulations are adequately providing for subsistence harvest or not. Because the proposal notes that increasing competition from NFQUs is making subsistence harvest more difficult and because no similar proposal has been submitted before, we can presume that in the past FQUs were able to provide for subsistence uses. Therefore, to evaluate the need for this restriction of NFQU opportunity we investigated harvest and measures of hunter effort for trends of increasing effort and harvest by NFQUs.

We found that the numbers of FQUs and NFQUs hunting deer in this area has declined, but that decline in participation was much greater among FQUs. This decline in hunter participation appears related to the severe winter of 2006/2007. The average number of FQUs hunting deer in this area before RY07 was approximately 50% greater than the average from RY13 to present. We have also seen an historic decline in the number of Angoon residents who received deer harvest tickets. Numbers of NFQUs hunting deer in this area also declined, but by only 30%. Days of hunting effort showed a similar trend. The number of days hunted by FQUs has declined from the 1997-2006 average of 320 days per year to an average of only 121 days per year since 2013, a decrease of 62%. The decline in hunting effort for NFQUs for the same time periods has been approximately 38%. This finding directly contradicts the assertion in the proposal that increasing competition from NFQUs is hindering harvest by FQUs. In fact, total deer hunting effort and the potential for competition between FQUs and NFQUs in this area has substantially declined.

To evaluate whether FQUs are having an increasingly difficult time harvesting deer we looked for trends in the number of days of hunting effort required to harvest 1 deer and number of deer harvested per hunter. Since RY97 days of hunting effort to harvest 1 deer has been stable for NFQUs but is trending slightly downward for FQUs. In recent years FQUs on western Admiralty Island are harvesting fewer deer per hunter than they did prior to 2012. However, since RY13, deer harvested per FQU has been trending upward suggesting FQUs are enjoying increasing success.

If harvesting deer was becoming more difficult for FQUs, we would expect to see an increase in the number of days of hunting effort required to harvest a deer and a decline in the number of deer harvested per FQU hunter. However, these measures of hunter success based on hunt reports provided by FQUs, including residents of Angoon, indicate that deer hunting conditions on western Admiralty Island remain very good and that in recent years FQUs have enjoyed greater hunting success.

Summary

The proposal asserts that the deer population on western Admiralty Island is depleted and that in recent years FQUs have had difficulty meeting their subsistence needs because of increasing competition from NFQUs. Our analysis of the deer population, hunter effort and harvest trends found no support for either contention. Instead, the available indicators support that deer remain abundant throughout GMU 4. On western Admiralty Island it is unlikely that hunter harvest has reduced deer abundance because total hunting effort is relatively light, and over the last 2 decades hunter effort and harvest have declined.

We could find no support for the contention that competition from NFQUs has increased or that NFQUs are hindering harvest by FQUs. In fact, over the past 2 decades, rather than increasing, the number of NFQUs and days of hunting effort by NFQUs has declined. Further, days of hunting effort by FQUs required to harvest a deer remains very low and the number of deer harvested per FQU has been increasing.

Our analysis does indicate a decline in the number of deer harvested by FQUs on western Admiralty Island. However, that decline is attributable to a decline in the number of FQUs and days of effort by those hunters. Over the last 20 years the number of FQUs and days of hunting effort by those hunters has declined by half. Deer remain abundant and competition from NFQUs is stable or declining, so we conclude that the decline in federal subsistence harvest of deer results from a decline in participation and effort by FQUs, not depleted deer populations or increasing competition from NFQUs.

Impact on Subsistence Users

This proposal would result in eliminating some competition in this area between FQUs and NFQUs between September 15 and November 30. However, hunting under state regulations could still occur on state-owned tidelands below mean high tide and private property confusing state and federal subsistence hunters on where they can and cannot hunt.

Impact on Other Users

Opportunity for NFQUs to harvest deer on federal public lands on western Admiralty Island would be severely reduced. Seventy-two percent of the NFQU harvest from this area occurs during the period targeted for closure by this proposal.

Opportunity Provided by the State

The State hunting season and bag limit for deer in GMU 4 including western Admiralty Island is:

Bag Limit *6 deer*	**Resident Open Season**	**Nonresident Open Season**
(bucks only to Sep 14th)	*Aug 1 – Dec 31* (*Harvest ticket)*	*Aug 1 – Dec 31* (*Harvest ticket*)

Conservation Issues

There are no conservation issues for the deer population in GMU 4. Following 9 consecutive mild winters, the available population indices suggest the GMU 4 deer population remains high and stable. 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 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.

Enforcement Issues

If this proposal is adopted NFQUs will still be able to hunt deer on state-owned tidelands below the mean high tide line and on private property. The tideline is not marked, so NFQUs and enforcement officers will have difficulty determining when deer are above or below the line of mean high tide.

Position

ADF&G **OPPOSES** this proposal as originally submitted as well as with the changes suggested by the SERAC during their meeting in October 2021. There is no evidence that hunting by NFQUs has negatively affected FQUs overall ability to harvest deer. Adopting this proposal would deprive NFQUs of sustainable deer hunting opportunity contrary to terms laid out in Title VIII of ANILCA. This proposal would also unnecessarily restrict Alaskans, whom many are former residents of the area who have had to move away for a variety of reasons. They would then be put into a situation where they would be restricted in their ability to practice their traditional and cultural way of life.

Approximately 90% of land in GMU 4 is federally managed, and current federal regulations provide greater opportunity to federally qualified deer hunters compared to NFQUs. FQUs are eligible to hunt an entire month longer than NFQUs with a season extending through the month of January as well as a liberal designated hunter program.

As directed by Congress in Section 802 of ANILCA, subsistence uses of wildlife shall be the priority consumptive use on federal public lands "when it is necessary to restrict taking in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such population." Section 815 of ANILCA provides that a restriction on taking wildlife for non-federally qualified hunters is only authorized if "necessary for the conservation of healthy populations of fish and wildlife, for the reasons in Section 816, to continue subsistence uses of such populations, or pursuant to other applicable law." Proponents of this proposal, and similar ones that will be considered, interpret these conditions to mean it gives them the right to total exclusivity to an area based on the aesthetics of hunting. They justify the FSB passing this proposal with statements, "Just trying to find a way so people can hunt in peace here" or "… going to a favorite spot and, you know, seeing another boat there. It doesn't matter whether or not they're successful hunters or not, it's just the fact that they're there alter the way you hunt." Based on ADF&G's analysis of the only annually collected, objective, and quantitative data available, none of those conditions apply. There is no conservation concern for the deer population, and the continued subsistence uses of deer are not being impacted by NFQUs.

Data Tables

Table 2. Summary Table Federally Qualified Deer Hunters, WAAs 4041, 4042, 4043, 4044, 4054 and 4055.

Regulatory Year	No. of Hunters	Total Hunt Days	Bucks Harvested	Does Harvested	Total Harvest	Deer per Hunter	Days per Deer
1997	131.1	630.2	138.9	58.8	197.7	1.5	3.2
1998	82	385.9	169.1	40.4	209.5	2.6	1.8
1999	70.2	273.9	52.7	23.4	76.1	1.1	3.6
2000	49.2	271.6	87.5	47.2	134.7	2.7	2.0
2001	51.6	312.4	80.7	26.7	107.5	2.1	2.9
2002	59.1	288.8	85.3	65.6	150.9	2.6	1.9
2003	70.4	167.9	117.8	28.5	146.3	2.1	1.1
2004	74.2	179.2	118.3	50.7	169	2.3	1.1
2005	51.4	216.7	131.7	56.8	188.5	3.7	1.1
2006	80.5	473.5	162.8	31.8	194.5	2.4	2.4
2007	50.7	165.5	54.1	20.1	74.2	1.5	2.2
2008	25.1	221.9	51.8	38	89.8	3.6	2.5
2009	40.3	101.4	33.2	5.8	39	1.0	2.6
2010	46.3	151.3	87.4	16	103.4	2.2	1.5
2011	38.2	162.1	78	39.8	117.8	3.1	1.4
2012	52.1	164.1	59.3	15.7	75	1.4	2.2
2013	29.8	80.4	31.3	9.9	41.1	1.4	2.0
2014	41.9	118.2	26.2	10.8	37	0.9	3.2
2015	28.8	39.2	19.1	4.4	23.6	0.8	1.7
2016	48.5	224.7	77.6	21.3	98.9	2.0	2.3
2017	27.3	48.8	30.2	16.4	46.5	1.7	1.0
2018	26.8	59.8	25.7	7	32.8	1.2	1.8
2019	44.4	128.1	63.2	15	78	1.8	1.6
2020	48.9	265.5	50.5	37.1	87.5	1.8	3.0

Table 3. Summary Table NFQ Deer Hunters, WAAs 4041, 4042, 4043, 4044, 4054 and 4055.

Regulatory Year	No. of Hunters	Total Hunt Days	Bucks Harvested	Does Harvested	Total Harvest	Deer per Hunter	Days per Deer
1997	153.2	558.7	137.8	72.9	210.7	1.4	2.7
1998	152.3	697.9	127.8	98.3	226.2	1.5	3.1
1999	208.2	976.7	179	117.3	296.2	1.4	3.3
2000	157.1	858.1	138.7	38.4	177.1	1.1	4.8
2001	138.5	677.3	168.4	74.1	242.5	1.8	2.8
2002	149.5	637.2	106.7	50.8	157.5	1.1	4.0
2003	118.3	607.9	132.9	62.3	195.2	1.7	3.1
2004	171.5	692	172.2	66.3	238.5	1.4	2.9
2005	123.6	450.7	106.9	43.4	150.3	1.2	3.0
2006	61.8	267.7	51.5	51.5	103	1.7	2.6
2007	126.8	653.2	48.4	24.2	72.6	0.6	9.0
2008	63	271.2	45.4	9.5	54.9	0.9	4.9
2009	67	215.5	33.5	14.4	47.9	0.7	4.5
2010	94.9	464.7	136	40.8	176.7	1.9	2.6
2011	91.7	429.2	92.4	29.7	122	1.3	3.5
2012	84.2	388.4	52.2	41	93.3	1.1	4.2
2013	91.6	362.5	65.8	28.2	94	1.0	3.9
2014	101	354.5	86	28.4	114.4	1.1	3.1
2015	131.5	568.7	132	43.2	175.2	1.3	3.2
2016	122.2	500.4	115.5	29.1	144.6	1.2	3.5
2017	77.8	313.1	56.8	28.7	85.5	1.1	3.7
2018	96.1	364.8	89.1	31	120.1	1.2	3.0
2019	101.9	384.3	81.1	21	102.3	1.0	3.8
2020	85.7	350.4	80.2	32.8	112.9	1.3	3.1

WRITTEN PUBLIC COMMENTS

[EXTERNAL] Alaska Outdoor Council comments - 2022-2024 Wildlife Proposals

Rod Arno <rodarno@gmail.com>
Mon 7/19/2021 12:23 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Cc: Mulligan, Benjamin J (DFG) <ben.mulligan@alaska.gov>

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Alaska Outdoor Council
310 K Street, Suite 200
Anchorage, Alaska 99501
July 19, 2021

RE: Public comments for FSB 2022-2024 Wildlife Proposals

The Alaska Outdoor Council (AOC) is a Statewide coalition of individual members and clubs representing 10,000 Alaskans who hunt, trap, fish and recreate on public lands/waters in Alaska. AOC Club Representative have participated in the regulatory process of managing and allocating fish and game in Alaska since before statehood in 1959.

Numerous proposals submitted by Federal Subsistence Regional Advisory Councils, federally recognized subsistence communities, and individuals confirm the fears that many AOC Representatives had at the time of the passage of Alaska National Interest Lands Conservation Act (ANILCA) 1980. Dual management of who can harvest game depending on whether you are on state public and private lands or if you are on federal lands was not the intend of Congress when they passed ANILCA.

AOC opposes WP22-07, WP22-08, WP22-09.
Alaska Department of Fish & Game data should not invoke a complete closure to non-Federally Qualified Subsistence Users under Section 804 of ANILCA. Even the 9th Circuit Court, *Noatakat Traditional Council v. U.S.*, 227 F.3d 1186 in 2000 understood the priority given in Title VIII of ANILCA was not absolute.

AOC opposes WP22-15.
Congress's findings and declaration in Sec. 801 of ANILCA should leave no room for regulatory action by the Federal Subsistence Board (FSB) regarding anti-trapper claims. Sec. 801(3) of ANILCA should have the FSB concentrating only on "remote federal lands", as was the intent of Congress when they passed 802(2) of ANILCA.

AOC opposes WP22-16 thru 22.
Providing a priority for some individuals or communities to harvest game on federal public lands located on the Kenai Peninsula only exacerbates the conflict between federally qualified hunters and Alaskans living in non-federally qualified areas of the state. Both groups of hunters are similarly situated.

AOC opposes WP22-32.
It would be in Alaskan's best interest if the FSB would reduce the number of Alaskans allowed a priority to harvest game on federal lands just based solely on where they live, not how.

Thanks for the opportunity to provide public comments.

Rod Arno, Public Policy Director
Alaska Outdoor Council

Sent from Rod Arno's iPad.

To Whom It May Concern,

I am writing today thankful for the opportunity to voice my opinion regarding the following proposals.

WP22-07 - To exclude hunting privileges in this region to Juneau residents who depend solely on deer meat to survive is simply outrageous. Angoon hunters DO NOT hunt anywhere remotely close to Hawk Inlet and have the benefit of hunting more productive and safer waterways near town. (Mitchell Bay) Where Juneau residents even on a good weather day cannot reach. It will confine hunting areas to Juneau residents which will increase pressure on already overcrowded areas furthermore helping to create unsafe scenarios. It is discriminatory, unethical, and does not show good land management for the "American people" rather it divides and polarizes Alaskans in the region.

WP22-08 – I hope this is not a biased proposal toward Juneau hunters and is actually based on science relating to current deer populations. How did we go from 6 to 2? Snow and ice lead to winter die off which effects overall deer populations not hunters.

WP22-09 - Rural hunters outside of Juneau already have the benefit of a longer harvest period. Just because our jobs and lives are based in Juneau does not mean we want the high cost of inferior meat from Costco.

In closing please do not take away these beautiful places to Juneau residents limiting our access to the outdoors, feeding our families, and the social benefits hunting brings us.

Thank you

Adam S. Anderson

Mike Bethers
P.O. Box 210003
Auke Bay, AK 99821
(907)-321-1186
mikebethers@gmail.com

June 22, 2021

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

Re: Wildlife Proposals 22-07, 22-08, and 22-09

Dear Mr. Matuskowitz:

Please include these comments in the public record. Please give a copy to each board member.

Subsistence deer hunters (Federally Qualified Users or FQUs) from Angoon, Hoonah and Pelican are claiming that non-subsistence deer hunters (Non-Federally Qualified Users or NFQUs) are out competing them for blacktail deer. Village residents are federally qualified and already have priority use of the deer resource as their season runs through January 31, while the NFQU season ends December 31.

The Southeast Alaska Subsistence Regional Advisory Council has developed three wildlife proposals – 22-07 Angoon, 22-08 Hoonah, and 22-09 Pelican – to address claims that NFQUs are responsible for reduced subsistence harvests in these villages. These proposals are based only on comments from villagers and are not based on any actual data or documented observations.

Based on my personal observations made deer hunting in Northern Southeast Alaska over the last fifty years and findings of the Alaska Department of Fish and Game (ADF&G) harvest studies, these proposals can not be justified in any way and should not be adopted.

I have been a lifelong deer hunter and am over seventy years old. The last several years I've spent more than fifty days in the woods annually, and for the last fifty years, my hunting has been in Northern Southeast Alaska; I've hunted in all areas included in these proposals. I can still get up the mountain farther than I can get a big buck out of the woods and am very selective of what I harvest and where. I use a boat to access my hunting areas and do a lot of calling and don't hunt from drivable roads. I haven't been on the Hoonah road system in decades. Every year I let many deer walk away rather than shoot them and have absolutely no problem getting enough deer to meet my family's needs.

Theo Matuskowitz
June 22, 2021
Page 2

Following are comments that apply to all three proposals (22-07, 22-08, and 22-09)

FQUs already have priority to deer as they can hunt through January when deer are often most available while NFQU's season ends December 31.

The winter of 2007-2008 saw a record high snowfall throughout Northern Southeast Alaska and as a consequence, deer where driven to the beach in numbers not seen since. They were at the peak of availability. Since the winter of 2007-2008 there has been less snowfall and deer have not hit the beach in numbers seen during the 2007-2008 winter. In the last three to four years there has been less snow and more rain. Deer have not herded up on the beach much and it has been more miserable to hunt in the rain but hunters I associate with, that like to hunt and eat venison, were out there hunting.

In the areas I've hunted the last ten years, I have seen fewer hunters than in earlier years.

Since the deer killing winter of 2007-2008, the deer populations in all three areas have rebounded and currently are at or near all time highs.

Comments on 22-07 Admiralty

This proposal would essentially close federal lands from Pt. Marsden to Pt. Gardener to deer hunting by NFQUs from September 15 through November 30.

Most NFQUs from Juneau who hunt the West side of Admiralty usually turn around at Funter Bay or Hawk Inlet as there are few to no good anchorages south of Pt. Marsden. Also, the proposed closed area is too far from Juneau for day trips. It is my belief that most subsistence hunting from Angoon is done on the beaches, which are not included in this proposal as beaches are state land.

I know several NFQU hunting parties that hunt West Admiralty, mostly north of Pt. Marsden, and they are typically quite successful. I know of two parties of NFQUs that hunt out of Angoon and they always get their deer.

Comments on 22-08 Hoonah

Hoonah has really degraded local wildlife habitat through extensive clear-cut logging (which has been shown to significantly impact wildlife values over the long period) and the extensive road system (which has been shown to also reduce the area's wildlife values). The Hoonah road system has become a favorite place to conduct hunting by Hoonah residents, especially after doe season opens. Please note that reduced sailing schedules of the Alaska Marine Highway's ferries have reduced opportunity for NFQUs from Juneau to get to Hoonah to compete with local hunters.

Over the years, deer have adjusted to the heavy hunting pressure along the Hoonah road system. After a week or two of harassment by road hunters, surviving animals move away from the roadside. However, I know those that hunt in the woods accessed by the Hoonah road system have had no problem finding deer.

Theo Matuskowitz
June 22, 2021
Page 3

I have heard of two Hoonah residents who in the past typically shot many more deer than the limit, which would take deer away from other hunters.

Also please note that data shows there is minimal exchange of deer between the north shore of Tenakee Inlet and areas accessed by the Hoonah road system. The mountains on the north side of Tenakee Inlet serve as a dividing line for Tenakee Inlet deer and deer living north of the mountains in areas accessed by the Hoonah road system. Therefore, only areas accessed by the Hoonah road system on northeast Chichagof Island should be included in proposal 22-08 and the north shore of Tenakee Inlet should be excluded.

ADF&G deer harvest and hunter effort data applies to all three proposals.

1. Deer populations are at very high levels.
2. There have been substantial decreases in hunting effort by FQUs
3. There has not been any noticeable increase in hunting effort by NFQUs
4. The reduced number of FQUs still hunting are harvesting more deer than in the past.
5. There is simply no justification to support any of the three proposals.

In conclusion

There are very high numbers of deer available in all areas covered by these proposals, however, FQU hunters are no longer hunting. They are not taking advantage of the standard deer season (August 1 – December 31) or their priority opportunity of hunting through January. Deer are often most available during January, due to winter snow levels, etc.

Any restriction of NFQU deer hunting opportunity will not increase subsistence harvests in the villages. FQUs from the villages need to get out of the house and out of their vehicles and back into the woods to get their deer. They will have no problem.

Proposals 22-07, 22-08, and 22-09 are based on inaccurate beliefs of FQUs in the villages and lack any justification. Adoption of any of these proposals would be a needless and huge disservice to many hunters in northern southeast Alaska, hunting a strong public resource, on public lands.

Please reject (not approve) proposals 22-07, 22-08, and 22-09.

Thank you for the opportunity to comment.

Sincerely,

Mike Bethers
Auke Bay, Alaska

Mike Bovitz

9500 N Douglas Hwy

Juneau, AK 99801

(907)723-2279

Metalworks@gci.net

Theo Matuskowitz

Federal Subsistence Board

Office of Subsistence Management

1011 East Tudor Road , MS-121

Anchorage, Ak 99503-6199

Re: wildlife proposals 22-07, 22-08, and 22-09

Hello Mr. Matuskowitz:

I am NOT in support of the 3 wildlife proposals-22-07 Angoon, 22-08 Hoonah, and 22-09 Pelican.

The rural subsistence deer hunters/Federally qualified users are claiming it is getting harder to fill their quota of deer. They are concerned about the potential of not enough deer for their personal use to live a subsistence living. There is no science based facts to what is being questioned or science based facts to what they are stating on the deer population.

Alaska fish and game do harvest studies, pellet counts, flights for deer etc, etc. This is all paid for by every Alaskan through tax dollars. Based on their science the number of deer is quite plentiful and Federally Qualified Users already have an extended season going through January 31st. Alaska fish and game last year allowed every resident 6 deer instead of the normal 4. Why would they do that if there was a resource problem?

The only thing that has changed over the past years is our weather pattern. Snow is no longer coming in and staying on the beach for long periods of time driving the deer to the beach. Which is a good thing because as those big snow falls happen mother nature NOT man takes over and the deer start to die .

Proposals 22-07, 22-08, and 22-09 are not science based, have no justification, and would be the wrong thing to do to many Southeast Alaska hunters, hunting a public resource.

Please REJECT and NOT APPROVE proposal 22-07, 22-08, 22-09

Thank you for your time,

Mike Bovitz

[EXTERNAL] SE Deer Hunting

Lee Bridgman <Lee.aklife@outlook.com>
Fri 7/9/2021 1:53 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

RE: proposed changes to deer hunting in Unit 4 are WP22-07, WP22-08, WP22-09, and WP22-10.

I myself do not hunt in the Southeast and do not believe the large numbers are making their way to hunt deer in this area. The cost of getting there compared to the game meat taken would make the trip counter productive. As for the Wanton Waste of game meat, I would believe that F&G would be very able to check vessels arriving in Juneau for proper care of the game meat.

The proposals will only further divide the user groups, which is not a desired result. If limits need to be reduced, for all, then so be it.

Do not proceed with these proposals.

Thank you,

Lee H. Bridgman
763 Wanda Dr
North Pole, AK 99705

[EXTERNAL] WP22-07

Tel k <tel.brown89@gmail.com>
Mon 7/5/2021 9:17 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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WP22-07 there is no reason to close deer hunting on admiralty Island to the public. The population is plentiful so there is no need to make this subsistence only. There are plenty of deer on this island and there have been for years. I personally work with people who live or have lived in angoon and none of them have ever had a problem harvesting deer. If they aren't turning in deer tags it's because they don't report the deer they kill. There is no reason what so ever to close admiralty Island for public deer hunting. There are more than enough deer on the island to support hunting. I even work on the island so you can't tell me there aren't enough deer on admiralty.

[EXTERNAL] FW: [External Email]Deer hunting

Perry, Deanna -FS <deanna.perry@usda.gov>
Mon 7/19/2021 1:30 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

From: Alpine Construction Enterprises <alpineconstructionenterprises@gmail.com>
Sent: Monday, July 19, 2021 1:20 PM
To: Perry, Deanna -FS <deanna.perry@usda.gov>
Subject: [External Email]Deer hunting

[External Email]
If this message comes from an **unexpected sender** or references a **vague/unexpected topic;**
Use caution before clicking links or opening attachments.
Please send any concerns or suspicious messages to: Spam.Abuse@usda.gov

To whom it may concern;

I'm writing in reference to:
WP22-07 2022 Wildlife Proposed Regulation Change Organization

I am opposed to the changes presented to harvesting of deer in these areas. I do not believe this is an accurate pertayal of the deer hunting situation. As a land owner in the village of Angoon to not be allowed to hunt without permanent residency would be absurd.

Thank you,

Adam Brown

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[EXTERNAL] Public comment: Wildlife proposals 22-07, 08, 09

Kelly Cates <kacates@alaska.edu>
Mon 7/19/2021 9:31 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Subsistence Management Board,

I am writing in opposition to wildlife proposals 22-07, 22-08 and 22-09. I am a SE hunter and my family regularly hunts in each of the proposed areas. We rely on subsistence meats to feed us through the year and enjoy the memories created from our hunting trips. It is unclear to me why these proposals were initiated as the data outlined in the packets suggests that deer populations are thriving and that FQU's are harvesting more deer than they used to. So if there are plenty of deer and enough for all users, why should one user group be excluded? Again, I oppose these proposals and hope the facts outlined in the information packets are fairly weighed in the boards decision.

Thanks,
Kelly Cates
--

Kelly Cates, PhD Candidate
College of Fisheries and Ocean Sciences
Juneau Fisheries Division, University of Alaska Fairbanks
kacates@alaska.edu | (360) 620-5032

'May your trails be crooked, winding, lonesome, dangerous, leading to the most amazing view'

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[EXTERNAL] Comments for WP22-07,8,9,10

Matthew Catterson <mattcatterson@yahoo.com>

Fri 7/16/2021 4:30 PM

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

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Federal Subsistence Board Members,

I am writing to comment in respectful opposition to the regulatory actions proposed in WP22-07, WP22-08, WP22-09, WP22-10. I am currently a resident of Juneau, but I have spent most of the past 15 years residing in the Southeast Alaska communities of Yakutat and Sitka. My time living, working, fishing, and hunting in these communities has engendered in me a great respect and connection to the subsistence lifestyle.

Because of my background, I can certainly empathize with the concerns presented by the authors of these proposals. However, the information provided in ADF&G Department comments is aligned with my experiences hunting in the proposal areas, which is that hunting effort in these areas is minimal and that competition between hunters is not responsible for trends of reduced deer harvest by FQUs or NFQUs. I believe it is widely accepted that environmental conditions (harsh winters), not hunting pressure, is the primary driver of deer abundance in Northern Southeast Alaska.

I would ask Federal Subsistence Board members to very carefully consider these proposals that significantly reduce available hunting areas to residents of Juneau. As you know, just because someone lives in a larger community like Juneau, does not mean they don't live a subsistence lifestyle and place great cultural, traditional, and personal value on a connection to the natural world that is based on procuring food for themselves, their family, and their community. The closures and bag limits reductions in these proposals would significantly impact traditional hunting use patterns for many people who live in Juneau and should only be enacted in extremely dire circumstances.

As an alternative, I would not oppose regulatory changes that increase opportunity for FQU's while maintaining existing hunting opportunity for NFQUs. This type of regulatory change, coupled with ADF&G assertions that deer abundance is relatively stable in proposal areas, may achieve the increased harvest sought by proposal authors.

Thank you for your time and consideration of my comments.

Matt Catterson, Douglas, Alaska

[EXTERNAL] Unit 4 WP22-07, WP22-08, WP22-09, WP22-10 Proposed closure of Blacktail deer seasons to non-subsistence hunters

Ken Couch <kc_n_gurls@yahoo.com>

Mon 7/19/2021 5:35 AM

To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>; AK Subsistence, FW7 <subsistence@fws.gov>
Cc: AK Subsistence, FW7 <subsistence@fws.gov>

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I am opposed to these proposals because there is no scientific evidence or biological data to support these recommendations. ADFG biologists are on record stating the proposed closures will unnecessarily restrict non-subsistence hunters of opportunity to hunt contrary to Title VIII of ANILCA. There is no biological evidence or even a reason to believe that non-subsistence hunters are affecting the federally-qualified subsistence hunters ability to harvest deer.

I am getting tired of RACs, aided and abetted by the Subsistence Office of FWS Region7 continuing to waste public funds on these frivolous proposals to give federally-qualified subsistence hunters a private hunting club paid for by all Federal tax payers. Federal Regulations REQUIRE that the proponent of any rule change has the burden of proof to show the proposed change is necessary. The RAC has not provided any proof. Instead, all this is just wasting tax dollars. Maybe all the non-subsistence hunters should start making frivolous proposals that the RAC has to fight. Then maybe they would not have time to waste time and tax dollars on unsubstantiated claims.

Ken Couch

Sent from my iPhone

[EXTERNAL] Proposals 22-07/08/09

Elias Daugherty <elias1547@yahoo.com>
Mon 7/12/2021 4:39 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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I Elias Daugherty
Oppose the proposal 22- 07/08/09
The deer numbers show healthy and Sustainable.

I do think that nNon-residents becoming residents should have a stricter and longer qualification period
For hunting
Privileges
Such as a 5 year stay required.

I also believe if there is a concern about deer numbers being taken that the price for non-resident dear tags should increase. And Stricter non-guided deer hunts.

Sent from my iPhone

[EXTERNAL] deer hunting proposal

Atlin Daugherty <akhomefire@yahoo.com>
Sat 7/17/2021 10:31 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello my name is Atlin Daugherty I am a third generation Alaskan and my son is forth. I was born and raised in Juneau. I am a commercial fisherman and a hunting guide my two occupations. Deer hunting is very dear to me and my family and our main meat food source. I am writing in opposition to the three proposals to close fee hunting areas to non subsistence deer hunters. I am opposed to all three I personally hunt the North West corner of Chichagof.

The state biologist data for deer numbers and harvest numbers do not support such an aggressive proposals and shut down. Also the displacement of hunts could have a unintended adverse affect on the deer population out side of these areas.

Many people who grew up in villages and now live in Juneau, will be locked out out of these proposed area's. Or multi generational family such as myself and who were born and raised in Juneau who use these areas to deer hunt will no longer be doing so. The Irony of this is Life long Alaskans who live in Juneau or Ketchikan Year Round won't be able to hunt these area while somebody who claims residency in one of these villages spends 4 months there and then spends the rest of the year in Hawaii qualify for these hunts.

One solution to this might be to have the non substance qualified users deer harvest to go back to 4 deer per person rather then 6.

Thank you for your time

Atlin Daugherty

Sent from my iPhone

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

John Demuth <jdemuth@pndengineers.com>
Wed 6/30/2021 5:46 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Attention: Theo Matuskowitz

The intent of this email is to voice my opposition to the following proposals:

- WP22-07
- WP22-08
- WP22-09

The population of deer in these areas (as all areas in SE Alaska and Kodiak) has historically been impacted primarily by weather, and in particular the amount of snow experience in a given winter/early spring – NOT by the small percentage of hunters who may choose to venture further away from towns/areas with greater hunting pressure – i.e. Juneau. When heavy snow kills off deer, EVERYONE feels the impacts due to reduced numbers of deer.

W22-07 in particular is extremely exclusive and excessive as it covers over 70 miles of the west side of Admiralty Island – 40 miles north and 30 miles south. This is simple outrageous. NOBODY in Angoon hunts 30-40 miles from town, but rather they hunt primarily in Mitchell Bay due to the close proximity and favorable weather conditions – i.e. protected from high wind/waves. In addition, the vast majority of hunting pressure on the south end of Admiralty is from Petersburg and Kake hunters – who also qualify as subsistence hunters and hence will continue to compete with Angoon hunters – effectively changing nothing. The proposal clearly is intended to exclude Juneau hunters from hunting on the west side of Admiralty Island and will hence increase hunting pressure on the east side of Admiralty. The intent seems reasonable, but the range/area is far too large and should be reconsidered to be more focused on the immediate area around Angoon.

Thank you for your consideration.

- John DeMuth

[EXTERNAL] Unit 4 deer proposal

luke dihle <lukeolaf@yahoo.com>
Sun 7/18/2021 8:21 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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In regards to limitations in non subsistence hunters access to federal lands to hunt I believe this time period is too extreme. I am a lifelong Alaskan and currently live in Juneau. I would support some limited period of time that rural communities could hunt around there areas without "outsiders"but this time frame is too long. As shown by the numbers outlined in Fish and games response this does not appear necessary. It's limits many other Alaskans ability to fill their freezer with minimal benefit to a few.
Sincerely
Luke Dihle

Sent from my iPhone

[EXTERNAL] Public Comments Regarding Subsistence Management Program 2022-2024

Jared Erickson <erickson_jared@yahoo.com>

Sat 7/17/2021 7:43 AM

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

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Public Comments Regarding Federal Subsistence Management Program 2022-2024:
WP22-07
WP22-08
WP22-09
WP22-10

Federal Subsistence Board-
I would like to take this opportunity to voice my opposition to the proposed changes to the above referenced deer hunting regulations in SE Alaska. To manage a population of a targeted animal species for harvest, I do believe it would be a mistake to consider anything other than the health of the population of that species. The ADF&G recently produced a comment response to the above proposed changes and the general trends show that there are fewer FQU's hunting, and they are hunting fewer days per year. The data also strongly suggested that the the Sitka Black Tail Deer populations in the areas referenced above are absolutely healthy and stable. That is, it has been a renewable source of food for all user groups for many years. The above proposals also do not take into account that deer at, or below, the mean high tide mark would still be eligible for harvest by the NFQU user group. I believe that this would actually make the concern worse due to the fact that all hunting efforts in these areas by NFQU's would be focused on the easier deer to harvest. If a NFQU is not allowed to harvest deer at elevation, or via flying into a lake that drains into these areas, the focus will shift to the deer near below the mean high tide level. This would generate the exact opposite effect as what is desired. I also believe it would be very hard to enforce the new proposals. The most concerning example I can think of is what will happen if a deer is shot below mean high tide, but then expires and is recovered above the mean high tide? A difficult scenario and one that invites controversy.
The above areas do have a natural barrier against too much traffic. For the months of concern, the population from Juneau must transit around Point Retreat and navigate Southern Lynn Canal to get to these areas if they are hunting by boat. This is the same body of water that will often prevent the Alaska Marine Highway System from making scheduled trips due to wave height and wind. The FQU's are positioned in the heart of the best hunting areas, giving them distinct geographic advantage.
If the true problem is FQU's not meeting their ANS, there are alternatives to the above proposals. Perhaps the Subsistence Board could consider subsidies to the FQU's in terms of fuel or equipment. Another option may be to liberalize proxy hunting for the communities in need. But if the real reason the FQU is experiencing a decrease in deer harvest rates has to do with fewer hunters putting in fewer days we should not penalize other user groups who use the same resource for the same reasons.
I have been a resident of Alaska my entire life, nearly 45 years, and Sitka Blacktail Deer from the regions above are an important part of calories for myself and my family throughout the year. I would like to voice my support for keeping the hunting regulations as they are and not preventing NFQU's the opportunity to continue to utilize this healthy, renewable source of food in our region.
Sincerely-
Jared Erickson
Juneau, AK

[EXTERNAL] Comments RE: All Southeast deer proposals, including but not limited to WP22-07, WP22-08, WP22-09, and WP22-10

Kyle Ferguson <pabucktail@hotmail.com>

Mon 7/19/2021 5:34 PM

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

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

As an over 20 year resident of Sitka, and a federally qualified subsistence deer hunter, I would like to state my opposition to the proposals attempting to limit the deer hunting opportunity for non-qualified hunters in Southeast Alaska. My opposition is for the following three reasons:

First, there is no valid scientific reason for the proposed limitations. There are currently no existing or anticipated population concerns for deer in Southeast Alaska. Deer numbers across the region are increasing. With the general pattern of mild winters in the last decade Admiralty, Baranof, and Chichagof deer numbers are as good as they've ever been. In GMU 3 it looks like deer numbers are the best they've been in at least a generation. Scientific study of deer numbers in GMU 4 showed that numbers are high enough to sustain a limit for all residents of 6 deer per year. Anecdotal information from hunters and people who live in Southeast's subsistence communities indicates the general impression of excellent deer numbers.

Secondly, there is no valid social reason for the proposed limitations. In a 7/16/21 article in the Sitka Sentinel members of the Regional Advisory Council were interviewed and stated their rationalizations for these proposals. The reasoning revolved around perceptions of unfairness related to boats and trucks owned by other hunters accessing hunting areas, and perceptions of increased competition and decreased opportunity for federally qualified users. Neither of these points stands up under the scrutiny of facts. No matter who we are, there will always be someone with a better truck or boat than any one of us. Being offended by this reality will make us all a bunch of victim-based thinkers, and in sum are the mere voice of emotions rather than real facts. In regards to the idea of increased competition and decreased opportunity, if anywhere were to qualify for such an idea it would be Sitka, the subsistence community with the greatest numbers of qualified, non-qualified and non-resident hunters. In spite of the greatest numbers of competition, Sitka hunters don't seem to have a problem meeting their subsistence deer meat needs. This fact was acknowledged by Sitka RAC member Harvey Kitka who stated Sitka hunters don't have the problems alluded to by the RAC members from other communities.

In contrast, there are actual social reasons for rejecting these proposals. Deer hunting anywhere, but especially in Southeast Alaska, is a time-honored activity which affords people an opportunity to sustain themselves while enjoying and passing on a heritage that transcends generations. We all live in small towns here. The reality is that for reasons of employment, marriage, medical concerns, education, or various other factors, any one of us could find ourselves with family members living in non-qualified Alaska communities, or down south. I hate to envision a scenario where a grandfather in Sitka, an uncle in Angoon, or father in Kake couldn't take a young person deer hunting because a proposal such as this made it illegal to mentor the next generation.

Lastly, data and facts shows there's no practical reason for the proposed limitations. In the same 7/16/21 Sitka Sentinel article ADF&G biologist Steve Bethune was interviewed. He pointed out some

interesting facts related to hunter effort. Across the region it seems hunting pressure is light. Additionally, non-qualified hunter effort has remained stable while hunting effort by qualified subsistence hunters has declined. I don't know why there are presumably less qualified subsistence hunters, or why the same numbers of hunters are hunting less days. But the fact remains that the data shows if anything, hunters in the communities involved in this proposal have even greater opportunity than they did ten or twenty years ago.

Thank you for your hearing and consideration,

Kyle Ferguson, Sitka

sent from Outlook

[EXTERNAL] opposition to these proposals

Ron Flint <ron@nuggetoutfitter.com>
Mon 7/19/2021 2:02 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Federal Subsistence Board;

Count me in opposition to the following proposals.

1. western Admiralty from Sept 15 to Nov 30 that includes Hawk Inlet and south WP22-07
2. reduced bag limit for Chichagof (Hoonah and Tenakee, Freshwater Bay) from 3 to 2 WP22-08
3. closure of Lisianski Oct 15-Dec 31 WP22-09

Thank you for your time,
Ron Flint
12070 Cross St.
Juneau, AK. 99801

[EXTERNAL] Comments regarding 22-07, 22-09

Peter Flynn <flynn.peter@gmail.com>
Mon 7/19/2021 8:32 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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To whom it may concern,

I am an active hunter from Juneau, AK who would be affected by proposals 22-07 and 22-09. Myself and the group of people whom I hunt with also respect and hold great respect for the subsistence rights of other people in this state and wholly support their right to put food in the freezer. As hunters we hunt what only we can eat, aren't after trophies, and respect the land. We often hunt out of a cabin off the hoonah road system, always enjoying our conversations with neighbors and locals whether on the ferry, on the roads, or in town. We also fly into many of the affected areas, sometimes directly from juneau sometimes from other local airports, enjoying the cabins and beautifully different terrains that are available there. I am opposed to the aforementioned proposals as I believe there are better tools than closure to ensure that subsistence needs are protected without wholly excluding other parties, especially with such a healthy population of blacktails. Other tools are available that would provide for all affected parties such as altering bag limits depending on your subsistence qualification. Curtailing bag limits for non-subsistence-qualified hunters in these areas would keep subsistence as the dominant harvests while regional hunters from larger towns would be able to participate, as is being proposed in 22-08.

Thank you for your consideration,

Peter Flynn

[EXTERNAL] WP22-07, WP22-08, and WP22-09

Charles Frey <cfrey09@gmail.com>
Fri 7/16/2021 3:36 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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I am firmly opposed to WP22-07, WP22-08 and WP22-09. These proposals rely on hearsay & unscientific data to back up the proposed changes. The Alaska Dept of Fish & game who studies these areas is opposed as they cite healthy deer numbers. In addition, these areas are hard to access & have relatively light hunting pressure. This is pure & simple federal overreach & an attempt to lock down Alaska's wilderness for a self-serving reason by those in charge & those who sponsored these proposals.

Regards,
Charles Frey

[EXTERNAL] Oppose WP22-07

Ben Genz <bengenz@yahoo.com>

Mon 7/19/2021 7:43 AM

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

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I am opposed to this proposal as there is no scientific evidence or biological data to support these recommendations. ADFG biologists are on record stating the proposed closures will unnecessarily restrict non-subsistence hunters of opportunity to hunt contrary to Title VIII of ANILCA. There is no biological evidence that non-subsistence hunters are affecting the federally-qualified subsistence hunters ability to harvest deer.

Federal Regulations require the proponent of any rule change has the burden of proof to show the proposed change is necessary. The RAC has not provided any proof.

[EXTERNAL] WP22-07 Deer Hunting proposal for Admiralty Island, Unit 4

gilbertson@gci.net <gilbertson@gci.net>
Tue 7/13/2021 8:08 PM
To: deanna.perry@usda.gov <deanna.perry@usda.gov>; AK Subsistence, FW7 <subsistence@fws.gov>

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I am taken aback by the breadth of the proposal to limit deer hunting opportunities on Admiralty Island. It is too far-reaching.

Much of the northern part of Admiralty Island is a popular deer hunting area for residents who don't live in Angoon. I have property and a cabin on Wheeler Creek just east of Pt. Marsden and have hunted there every fall since 1975. I spend many weeks there in the fall. It is part of my urban subsistence lifestyle. Wild food has been part of my existence for many years. In all those years I have rarely encountered people from elsewhere in the woods. It is 40 miles from Pt Marsden to Angoon and it takes a lot of fuel and good weather to go that far for a deer.

Another observation after hunting in the area for 46 years and watching current populations of deer is that there are plenty to go around for everyone. Mostly it is weather that affects whether you can get deer or not, not just keeping other hunters from your area.

My preference is for this proposal to be turned down. However, an acceptable alternative that addresses the intent of the proposal, would be to limit the exclusive area boundary north of Angoon to Fishery Pt rather than Pt Marsden. This would provide adequate exclusive hunting opportunities for Angoon hunters without igniting the urban versus rural debate. It would also continue the opportunity for hunters to fly into Lake Kathleen and Lake Florence.

Steve Gilbertson
Wheeler Creek property owner

[EXTERNAL] Opposition of proposals 22-07, 22-08 and 22-09

Mary Glaves <Mare_e86@hotmail.com>
Mon 7/19/2021 1:24 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Dear Federal Subsistence Board,

These proposals do not seem to be being proposed based on science and monitoring of deer populations. ADF&G recently INCREASED the annual bag limit of deer from 4-6 in Port Frederick. FQUs are also allotted an additional month (January 1-31) to subsistence hunt, which actually puts unnecessary pressure on deer during the hardest month of winter for the deer, and the easiest month for someone to harvest a deer as they get pushed down to the beaches. These proposals add unnecessary restrictions to Juneau and Ketchikan residents. ADF&G assessments for all units to do support these proposals. I, also, do not support them.

Mary Glaves

[EXTERNAL] opposition to all federal deer subsistance proposals. WP2207 -- Wp2212

RICHARD HARRIS <RHDevelopment@gci.net>

Thu 7/15/2021 12:38 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>
Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

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Attn: Theo Matuskowitz,
Office of Subsistence Management
Regarding : Federal deer subsistence proposals Region-1 Southeast Alaska
Proposal Numbers: WP2207, WP2208, WP2209, WP2210, WP2212

As a lifelong deer hunter of Southeast Alaska I am writing to oppose the federal subsistence proposals for deer harvesting in Southeast Alaska. I have hunted some of these areas my entire life, access to the areas listed is very difficult, needing good weather and much planning, I believe the weather controls much of the hunting pressure from non-federally qualified users in these areas(somewhat self regulating). I could understand supporting a lower per hunter harvest number in some areas, but shutting these areas down entirely during the period of Oct. 15 – Dec. 31, to non-federally qualified hunters is not acceptable. limiting hunting to any months other than Oct. 15 – Dec. 31 should be considered a complete shut down as this is the only period a hunter can actually hunt and experience the calling of a deer, during the rutting season. Any regulation changes made should include some changes to the federally qualified user as well, not all but some are doing as much damage to the resource with immediate access and extended hunt seasons as the non-federally qualified user who has limited access and shorter harvest seasons. Also as I understand these proposals have no basis, there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. I hope you will take these comments into consideration and reject these proposals.

Thank you,

Richard Harris
P.O. Box 32403
Juneau, Alaska 99803

Richard Harris

Territorial Sportsmen Inc.

Post Office Box 32712 • Juneau, Alaska 99803

Telephone: (907) 789-2399 • Fax: (907) 586-6020

July 14, 2021

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

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-07) to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort is also declining. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

TSI opposes this proposal and respectively asks that it not be adopted.

Sincerely,

Shawn Hooton
Vice President, TSI

Sportsmen Promoting Conservation of Alaska's Fish and Wildlife Since 1945

[EXTERNAL] Subsistence proposals for Sitka Blacktail Deer in AK

Brooks Horan <brookshoran@yahoo.com>
Wed 7/14/2021 9:58 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

3 attachments (2 MB)
WP22_09 ADFG comments Draft_Final.pdf; WP22_08 ADFG comments Draft_Final.pdf; WP22_07 ADFG comments Draft_Final.pdf;

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Dear Sir/Ma'am,
I am writing to express my lack of support for the proposed changes to sitka blacktail hunting in SE Alaska. The data just does not support these changes. I understand that the purpose of the subsistence board is to listen to rural residents in AK. I have respect for the decisions made by the board to ensure proper distribution of resources. As a past Kodiak resident, I experienced scientifically sound board decisions first hand, and benefited from them. But in this instance, the data does not support the proposed changes. Take the Lisianski proposal, the hunter data shows that success rates for rural residents/federally qualified users (FQUs) is the best in the state. Given that success rate, the actual number of rural resident hunters has decreased. There is just no mathematical or scientific reason to support this change to limit access to non-federally qualified users (NFQUs). I fear cutting such huge swaths of land out for FQUs will concentrate NFQUs into a smaller area making overall deer management that much more difficult. I strongly oppose these proposals as a scientist and as a resource user. I have attached the ADFG comments which represents the best evidence to support my input. Thank you for your time and for the work you do to ensure that the best science is followed in these management decisions. I hope this comment reaches you before the July 19th deadline and can be considered in your decision along with the comments of my fellow Alaskans.
Very Respectfully,
Brooks Horan

[EXTERNAL] Wildlife proposal 22-07

Aaron Hulett <aaronthenurse@icloud.com>
Sat 7/17/2021 10:13 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Regarding wildlife proposal 22-07 on Admiralty island in Alaska I would like to voice my opposition. The numbers of deer on the island and harvest data do not support the claims made. This change would have a dramatic negative impact on non-federally qualified users and minimal or no positive effect for federally qualified users.

Thank you,

Aaron Hulett
1670 Mendenhall Peninsula Rd
Juneau, AK 99801
(360)460-4179

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 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

[EXTERNAL] Wildlife proposals 22-07 through 22-09

Jones Chiropractic <akchiros@gmail.com>
Mon 7/19/2021 10:34 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

Federal Subsistence Board
Office of Subsistence Management.
Attention: Theo Matuskowitz
1011 E. Tudor Road, MS-121
Anchorage, Alaska 99503

Dear Federal Subsistence Board,

I have deer hunted Admiralty Island and Chichagof Island for the last 25 years. From my personal experience, I wholly agree with Alaska Department of Fish and Game's (ADF&G's) assessments on the following proposals.

I oppose the Wildlife proposal 22-07 that attempts to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). I wholly support ADF&G's comments opposing this proposal.

I agree with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty (highest in the State), ADF&G increased the annual bag limit from 4 to 6 in 2019. Additionally, total hunting effort is relatively light and hunter efforts and harvests have declined.

ADF&G concludes the actual reason for the decline of federally qualified user (FQU) deer harvests are from a decline in participation and effort by FQU's, NOT depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort is also declining. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQU's, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-07 and respectively ask that it not be adopted.

I oppose Wildlife Proposal 22-08 that attempts to reduce the bag limit from 3 to 2 deer for the Northeast Chichagof Controlled Use Area (NECCUA).

I agree with ADF&G's, assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer in NECCUA, ADF&G increased the annual bag limit from 4 to 6 west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.

ADF&G concludes that the actual reason for the decline of FQU deer harvests is from a decline in participation and effort by FQU's, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort have remained stable. Additional, FQU's are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer, compared to 3 deer for NFQUs. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-08 and respectively ask that it not be adopted.

I oppose Wildlife Proposal 22-09 that attempts a closure of Lisianski Inlet, Lisianski Strait, and Stag Bay of Chichagof Island October 15 to December 31.

I agree with ADF&G's, assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 in 2019. Additionally, total hunting effort is relatively light and hunter efforts and harvests have declined.

ADF&G concludes that the actual reason for the decline of FQU deer harvests is from a decline in participation and effort by FQU's, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort have remained stable. Additional, FQU's are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-09 and respectively ask that it not be adopted.

Warm Regards,

Resident Hunter of Alaska

--

Dr. Stefanie Jones

10004 Glacier Hwy
Suite B
Juneau, AK 99801

[EXTERNAL] WP-22 07,08 and 09

David Keller <saltheart76@gmail.com>
Mon 7/19/2021 1:58 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Good afternoon,

I am writing to you today to voice my opposition to proposed regulation changes WP-22 07, 08 and 09. I feel that the changes, if approved, would negatively affect hunters who do not qualify for subsistence permits.

Thank you for considering my comments.

Regards,

[EXTERNAL] Changes 22-07 22-08 and 22-09

Chris klawonn <chris.klawonn@gmail.com>
Fri 7/2/2021 7:18 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Hello,

My name is Chris Klawonn, I live in Juneau and have been a resident in Juneau for a vast majority of my life. I plan on raising my children here, and I have loved the aspect of boating, fishing, and hunting my entire life. I'd like to keep this short and simple as I hope you are busy reading lots of comments on this topic. Closing the back side of admiralty to specifically Juneau residents is unnecessary, and would be costly and near impossible to regulate.
The number of Juneau residents hovers around 35,000, the total number of reported hunters in GMU 4 that reported a harvest in 2019 is 3,377 according to the ADF&G website. Let's assume that every single one of those harvests came from Juneau, which I know from friends and Facebook isn't the case, that's only 1 in 10 people that live in Juneau claiming deer on admiralty. I don't see this as anything near an issue effecting deer population on admiralty.
Second, if this proposition did pass you'd need troopers to nearly constantly monitor the back side of admiralty to ensure that nobody is breaking the law. How many officers, boats, and planes would it take to find the few boats from Juneau to genuinely balance the manpower, equipment, and fuel costs.
Please understand, I realize the people's frustration of seeing pictures with a huge commercial fishing boat with 20 deer on the bow, and realize that this is a bit excessive on the taking of such a great resource. Even worse is hearing the wonton waste of deer or really any animals, on this island or in any other location. But to squarely place the blame for this on the residents of Juneau is wrong.
Admiralty island is 1,646.4 square miles, making it the 7th largest island in the United States. Cutting off half of it to one community of 3000 or so hunters isn't right, and I hope you can see my side.

Good luck with your decision and thank you for your time.

[EXTERNAL] Object to Proposals

Jay/Amy Lloyd <jayamylloyd@gmail.com>
Mon 7/19/2021 12:28 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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I would like to submit my objection to proposals WP22-07, WP22-08 and WP22-09.

The abundance of the animals in the areas as stated by the Alaska Department of FIsh and Games objection to the proposals does not warrant this action. Federally qualified hunters also have an extended season that they can hunt these areas. I do not feel that these proposals are necessary or required at this time.

Sincerely,
Jay Lloyd

[EXTERNAL] Comments opposed to proposals WP22-07, WP-08, and WP-09

David Love <pandalid@yahoo.com>
Tue 7/13/2021 11:51 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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These comments concern Federal subsistence management program's Proposals WP22-07, WP22-08, and WP22-09.

As a hunter who lives in a non-subsistence area (Juneau) but uses sport hunting means to harvest wild game which is an essential source of protein for my annual sustenance, it is my observation (borne out by the ADF&G surveys) that there is not a conservation need to limit sport harvest of deer in any part of Unit 4, Southeast Alaska.

ADF&G Wildlife Conservation has many years of objective, quantitative data that shows that the deer populations in Unit 4 are not depleted, but are in fact at high and stable population levels, even after the heavy snow year of 2020/2021. Restrictions on non-subsistence hunters is not necessary and unfairly targets sport hunters whose numbers and hunt days are stable when NFQUs are declining. Also, the average number of deer harvested in Unit 4 has been stable for all users for 10+ years with good success rates in deer harvested. There is not increasing competition for deer among FQUs and NFQUs.

I urge the Federal Board to NOT support these proposals, and vote to oppose these proposals, since their claims are not true compared to the objective, quantified data showing strong population trends and stable deer harvest in Unit 4.

Thank you for your time, David Love, hunter and resident of Juneau

BACKCOUNTRY
HUNTERS & ANGLERS
ALASKA

Alaska Backcountry Hunters & Anglers Comments on Wildlife Proposal 22-07 and Wildlife Proposal 22-09

Proposed Change to Federal Regulation:

"Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users hunting under these regulations."

Backcountry Hunters & Anglers advocates for an ecosystem wide approach to land and wildlife management and to ensure that the public landscapes we speak up for remain open to hunting and angling. We are supportive of science-based management decisions and support the responsibility of state wildlife agencies to manage fish and wildlife populations on public and private land. We support and strongly encourage cooperation between state and federal management agencies to maintain robust fish and wildlife populations on Federal public land.

Alaska BHA has reviewed the proposals submitted by the Southeast Subsistence Regional Advisory Council (SRAC), the meeting transcripts, as well as hunter participation, harvest and population data provided by the Alaska Department of Fish and Game. We recommend the Federal Subsistence Board oppose the proposed closure of Federal public lands to hunting of deer by non-federally qualified users. Alaska BHA does not see that there is adequate information related to deer populations and harvest to meet the high burden needed to close Federal public lands or that these proposed closures will necessarily solve the problems identified by the SRAC.

Although we are opposing this proposal, Alaska BHA would like to bring up concerns that we have, some of which were expressed by the Council.

1. The Council expressed concern in the spring meetings that there is a limited selection of tools available for them to use to address their concerns. Several members expressed hesitancy over supporting these proposals due to their concern that they did not necessarily want to limit non-federally qualified users but lacked any other options.
    a. Alaska BHA would like to express our support of the Council in this regard and we would take this opportunity to support and encourage the concept of agency co-management. We understand the unique situation of subsistence management in Alaska and believe this situation calls for a stronger working relationship between state and federal agencies than is needed in other states where federal agencies are charged with managing habitat on federal land. An uncooperative relationship between state and federal agencies, as has been recently demonstrated in Alaska by ongoing litigation, leaves hunters and anglers to pay the price, regardless of federal status.
2. Data provided by the Alaska Department of Fish and Game shows that participation by federally qualified users (FQUs) and non-federally qualified users (NFQUs) has been decreasing but that FQUs participation is decreasing at a higher rate.
    a. Alaska BHA believes that the OSM and ADF&G Subsistence Section should be conducting more surveys to better understand why this decrease is

WWW.BACKCOUNTRYHUNTERS.ORG/ALASKA_BHA
ALASKA@BACKCOUNTRYHUNTERS.ORG

occurring, particularly when Federal land closures are involved. Factors far outside the realm of deer populations and hunt management can affect participation in a hunt and should be considered.

b. We would like to make the secondary point that decreasing participation rates among hunters and anglers is a concern of our organization. Our Hunting for Sustainability program is focused on ensuring we have future generations of hunters who will speak up on behalf of our lands, waters and wildlife. We do not want people to stop hunting and fishing, regardless of federal status.

3. Alaska BHA heard from both FQUs and NFQUs who share frustrations about waste of game in areas that receive higher hunting pressure, specifically around the Hoonah road system. When game is wasted it takes away present and future opportunities for both NFQUs and FQUs to put food in their freezers. We encourage Federal and State law enforcement agencies to increase enforcement of existing laws and work with local communities to identify illegal hunting activity.
4. Backcountry Hunters & Anglers was founded around the need for an organization of hunters and anglers to speak up for an ecosystem wide practice of conservation. The Council discussed several concerns leading up to these proposals that Alaska BHA, out of our concern for ecosystem wide conservation, believes are relevant.
   a. A general reduction in other available resources causes strain on hunters and anglers, especially those who depend more upon food harvested from the land. Reduced salmon and herring runs means less available opportunities to harvest additional food and increases the need to harvest the food that is available, in this case deer.
   b. Reduction in resources that other animals depend on increases competition. For example: bears, dependent on robust and healthy salmon runs that are now less consistent, may target more deer and thereby make deer more difficult to harvest.
   c. We share the frustrations of the Council, and many other Alaskans, over the issue of commercial trawl bycatch when many opportunities around the state to harvest halibut, salmon and other fish to put in our freezers are being limited. This increases strain on both FQUs and NFQUs.
5. Alaska BHA strongly emphasizes the need for these issues to be addressed and would like to remind both State and Federal agencies of your obligations to manage for subsistence priority, regardless of your definition of user group.

As an organization that counts both federally qualified users (FQUs) and non-federally qualified users (NFQUs) among our ranks, the Alaska Chapter of Backcountry Hunters and Anglers would like to offer our assistance in facilitating long-term solutions to the problems addressed by the Council.

WWW.BACKCOUNTRYHUNTERS.ORG/ALASKA_BHA
ALASKA@BACKCOUNTRYHUNTERS.ORG

[EXTERNAL] Proposal WP22-07

Jamalea Martelle <jamalealynn@gmail.com>
Mon 7/19/2021 10:14 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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I am writing in regards to proposal WP22-07.
I am a resident of Juneau and I consider myself to be a subsistence hunter. My family's main source of protein comes from our harvests of wild game and fish within Juneau and surrounding Southeast Alaska communities. While there are opportunities to hunt deer in the Juneau and Douglas area, my family and I take one to two trips during the fall to Admiralty Island for deer hunting. These trips are traditional getaways and opportunities for us to to explore the many beautiful, remote areas of Admiralty. We support the local economy by chartering flights to and from Forest Service cabins. By taking away the opportunity for non federally qualified subsistence users to hunt deer on Admiralty, you are taking away the privilege of many Alaskans that are traditional, subsistence hunters regardless of living rural. I strongly oppose this Proposal.

Thank you for your time,
Jamalea Martelle

Sent from my iPhone

[EXTERNAL] Southeast proposed subsistence deer limitations

Charlie Martelle <martellec@yahoo.com>
Tue 6/29/2021 10:29 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Hello,

I am writing about the proposed changes of wp-22 07, Wp-22 08, and wp-22 09. I am not in favor of limiting Juneau residents on these areas. I rely on wild game as my main source of protein. By limiting me and other residents of Juneau we will see an increase in the number of hunters in the areas that are not mentioned. This would mean it would be harder to get away from others and find the game we fill our freezers when we hunt closer to town.

We are already so limited in Juneau with hunting, one needs to either have a boat or charter a float plane to find "good" hunting. By dropping the limit on the road system in hoonah you would essentially take our one hunt that doesn't require owning a vessel or chartering.

From my experience on the coast there is abundant numbers of deer, same with the south west side of admiralty. If there was a shortage of animals I would be all for reducing bag limit, but I do not believe this is the case.

Again I am against any changes to the current regulations.

Thank you for your time
Charlie Martelle

Sent from Yahoo Mail for iPhone

[EXTERNAL] Federal subsistence hunting and trapping regulations comment 2021

Sarah Matula <s_matula1@yahoo.com>

Mon 7/19/2021 1:14 PM

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

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Federal Subsistence Board Members,

I am writing to comment in respectful opposition to the regulatory actions proposed in WP22-07, WP22-08, WP22-09, WP22-10. I have been a resident of Juneau for 8 years, and have been lucky enough to have gained relationships with people through out SE. Through these relationships, I have had the opportunity to learn, experience, and put into practice in my own life the respect and appreciation for the substance lifestyle.

I would ask Federal Subsistence Board members to very carefully consider these proposals that significantly reduce available hunting areas to residents of Juneau. As you know, just because someone lives in a larger community like Juneau, does not mean they don't live a subsistence lifestyle and place great cultural, traditional, and personal value on a connection to the natural world that is based on procuring food for themselves, their family, and their community. The closures and bag limits reductions in these proposals would significantly impact traditional hunting use patterns for many people who live in Juneau and should only be enacted in extremely dire circumstances.

Thank you for your time-
Sarah Matula, Douglas, Alaska

[EXTERNAL] Attn: Theo Matuskowitz

Mikesell, John <mik11001@byui.edu>
Sun 7/18/2021 8:08 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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To:

The Federal Subsistence Board

Attention: Theo Matuskowitz

The following is my comment on Subsistence regulation WP22-07:

I disagree with the proposed changes to the regulation. I have had the opportunity to hunt in the Angoon area for the past 18yrs and do not see the need to change the current regulation. I have not seen or been informed of any scientific data that would support the reason for the proposed regulation. Restricting Juneau residents from hunting in those areas would distance family members from being able to hunt in the Angoon community, if anything we want to help these communities. If you believe that this regulation needs to change, I suggest instead of restricting people from hunting altogether, possibly reduce the harvest limit from 6 deer to 4 deer for Juneau residents. I would also suggest limiting taking deer past December 31 to bucks only from December 31st through January 31st(for subsistence). Additionally, if the population of deer is the concern, I strongly disagree with the need to harvest deer past December 31st in the area. Unless an emergency order has been put in place.

Thank you for your time and consideration of my comments.

John Mikesell
Juneau Resident

[EXTERNAL] WP 22-07; WP 22-08; WP 22-09; WP 22-10

Grey Mitchell <fullcurl@live.com>
Wed 7/14/2021 9:04 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Attn: Theo Matuskowitz, Office of Subsistence Management

I am writing to oppose the referenced federal subsistence proposals for deer in Southeast Alaska as listed above. These proposals have no basis, as there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. Without specific data to demonstrate a particular subsistence purpose, these proposals are not only arbitrary and capricious, but they will violate the constitutional rights of non-federally qualified users. The credibility of federal subsistence management of wildlife resources on public lands hinges on the use of scientific data. Not only do these proposals lack scientific data, they lack any data to demonstrate a justified subsistence need. I urge the rejection of these unsupported and unjust proposals. Thank you.

Grey Mitchell
Alaskan since 1966
3065 Douglas Highway
Juneau, Alaska 99801

Sent from my iPhone

[EXTERNAL] WP22-07, WP22-08, WP22-09

Richard Morris <akreeldeal@gmail.com>
Mon 7/19/2021 8:40 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Attention Teo Matuskowitz

Good day,

There are a few proposals that I am writing in opposition to.

The first is WP22-07, which proposes to close the western side of Admiralty from Hawk inlet to the southern tip to non-federal users to make it easier for one group to gather food. I also try to fill my freezer with wild game so this would be selecting them over me. Although I have never hunted the area due to its remoteness and difficulty to get to during the hunting season I feel it will be a stepping stone to closing more of the National Forest as they request larger areas to make it easier for them and more difficult for others. I would say that looking at the ADFG hunt records would show that the majority of hunt effort from Juneau is on the eastern side of Admiralty island and any that can make it to the proposed area would say that hunting there is so much more easy than the eastern side. It is all relative.

WP22-08 is the looking to close the northern area of Chichagof island to non-federal users. I bought property in Freshwater bay for the main purpose of hunting. There are already regulations in place that have a harvest limit of 3 deer versus the 6 I could shoot anywhere else on the ABC islands. This is another remote area for someone from Juneau to access and has limited pressure from Juneau as could be found in the hunt records. The majority of deer that are harvested in the area are mainly road hunts as there is an abundance of logging roads throughout the area. As is the case with hunting, it can be challenging for those that don't get out into the forest and expect to fill there freezer shooting deer on the side of the road. Closing this area would impact the value of my cabin and experiences that come with having it there.

WP22-09 is looking to close other areas in the Hoonah area. Again, due to the remoteness this area does not get a lot of pressure from non-federal users.

In closing, these three proposals are trying to make harvesting deer a sure thing for the communities of Angoon and Hoonah. It is hunting, there are no guarantees that you will see a deer, let alone harvest one. Closing these areas will only benefit a few, and probably only to a small degree. These

areas are in the Tongass National Forest, which is to be managed for all user groups. With these proposals it will start to be managed for the select few and I oppose it.

Thank you,

Rich Morris

[EXTERNAL] Wildlife Proposal 22-07, 22-08, 22-09

Michael Nelson <michaelbn78@gmail.com>
Thu 7/1/2021 2:49 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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I am writing in opposition of these specific proposals, Wildlife Proposal 22-07, Wildlife Proposal 22-08 and Wildlife Proposal 22-09.

These proposals discriminate against Juneau residents unjustly. Excluding the small percentage of Juneau residents that have the ability to hunt in these areas will not increase subsistence means.

Michael Nelson
208-755-7618

[EXTERNAL] Angoon Resident Comment on subsistence regulation WP22-07

James Parkin <jwparkin4@gmail.com>
Fri 7/16/2021 6:24 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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To:
The Federal Subsistence Board
Attention: Theo Matuskowitz

Mr. Matuskowitz

The following is my comment on subsistence regulation WP22-07:

If the regulation is adopted it should include an allowance for juneau residents to be able to hunt with friends and family of those who live in Angoon or other communities within the restricted area.
If this provision cannot be given the regulation should not be adopted. Too many who once lived in the area but had to move to find work or medical care, still have family and friends in the area and return home for subsistence from time to time.

Thank you for your thoughtful consideration of my comments.

P.S.
Please reply to my email to let me know my comments have been properly submitted and will be reviewed.

Jim Parkin

Sent from my iPhone

[EXTERNAL] Attention: Theo Matuskowitz - Comment on the subsistence regulation WO22-07

Crystal Shumway <sweetcrystal31@yahoo.com>

Sat 7/17/2021 7:49 PM

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

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Mr. Matuskowitz

The following is my comment on the subsistence regulation WP22-07

I do not agree with the proposed changes to the regulation. I have been living in Angoon for 28 years and do not see the need for such a drastic change to the current regulation. Furthermore, at this time I have not been informed of any scientific data supporting the changes. Friends and family that grew up in Angoon still return from time to time for hunting. If you strongly believe the the regulation needs to be changed. I would suggest that you look at a change in the limit instead of cutting people off all together. For example, instead of 6 deer maybe 3 for non residents of Angoon.

Thank you for your time and consideration of my comments

Jimmy Parkin

P.s.
Please email me to let me know my comments have been properly received and will be reviewed

[EXTERNAL] WP22-07

nicholasporr <nicholasporr@yahoo.com>
Mon 7/19/2021 1:51 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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I am writing to urge the board to not pass WP22-07. Though the proposal claims that non-federally qualified hunters are impinging on the ability of federally qualified hunters to meet their subsistence needs, his own testimony at the SE AK federal subsistence board indicates that was not the reason for the proposal. Rather, he said he wanted to limit activity of fall bear hunters who he had caught stealing from his crab pots. While I certainly sympathize with the proposal's author, this proposal is the wrong course of action to address his concerns. It was suggested to the proposal's author at the SE AK federal subsistence board meeting that contacting the USFW district ranger might be a more appropriate course of action. I agree with that suggestion and add that the author might be better served using the ADFG proposal process to address the actions of bear hunters.

This proposal will do nothing to increase the ability of federally qualified hunters to meet their subsistence needs. Most of the non-federally qualified hunters in that area are likely friends & relatives of Angoon residents. As such, given the distance and expense involved in accessing this area, passing this proposal will only serve to strain cultural ties between Angoon and their Juneau based friends and relatives.

[EXTERNAL] Proposals 22-07,08,09,10

Tom Radandt <tomradandt0@gmail.com>
Fri 7/9/2021 2:52 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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There is no scientific evidence that supports the idea that non-Federally qualified users impact the success of qualified users. Therefore you must reject proposals 22-07, 22-08, 22-09 and 22-10.

To favor one group over another bases on any political characteristics is discrimination, which illegal.

Tom

RHAK
Resident Hunters of Alaska
unapologetically FOR ALASKAN RESIDENTS
PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

July 19, 2021

To: Federal Subsistence Board
Office of Subsistence Management
(Attn: Theo Matuskowitz)
1011 E. Tudor Road, MS-121
Anchorage, Alaska 99503-6199

Re: Federal Subsistence Board 2022-2024 Wildlife Proposals and Existing Closures

Dear Federal Subsistence Board Members,

Resident Hunters of Alaska (RHAK) represents several thousand members from across the state, rural and urban, who advocate for sustainable wildlife management policies and a resident hunting priority according to Article 8 of our state constitution.

RHAK participates in Regional Advisory Council (RAC) meetings and Federal Subsistence Board (FSB) meetings, and we have become alarmed at the continuing wildlife proposals and special action requests that are not based on actual biological emergencies or conditions that would prevent federally qualified subsistence users (FQU) from meeting their subsistence needs.

What makes any FSB closures and restrictions especially problematic is that there is no differentiation in the federal system between Alaska residents and nonresidents from another state or country; both Alaska residents and nonresidents are deemed the same under federal regulations by definition of a who is a FQU. A prime example of why this is so problematic is that often complaints about competition from non-local non-federally qualified subsistence users (NFQU) center on the nonresident component, which can often comprise the majority of NFQ hunters participating in these hunts. So, when any restrictions or closures on federal lands happen, Alaskans who used to live in a designated rural area but for whatever reason have moved to more urban areas of the state, can't return home to hunt and carry on their traditional hunting activities on federal lands, nor can other Alaskans participate in these hunts.

It has always been RHAK's position that when and where we have wildlife conservation concerns or subsistence opportunities are not being met, that the ***nonresident component should always be the first group of hunters***

restricted. If other restrictions are still necessary, only then can we support restrictions on resident hunters.

We have always advised RACs to first use the Board of Game (BOG) process when and where there are concerns with too much competition from non-local NFQ hunters, as the BOG can differentiate between Alaska residents and nonresidents.

Comments on Individual Proposals and Existing Closures

WP22-07 Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users hunting under these regulations.

OPPOSE

The rationale of WP22-07 is not based on any biological data or harvest statistics that show a conservation concern for the deer population on Admiralty Island or that subsistence needs are not being met.

According to Alaska Department of Fish & Game (ADF&G) data, over the last decade we have had mild winters in Game Management Unit 4 and the deer population is "*high and stable*." The deer population on western Admiralty Island is ***not*** depleted, as the proposal states. Nor are there any conservation concerns for the deer population under the current hunting regulations.

The proposal also states that there has been increased "*hunting pressure*" from NFQ hunters and it has "*become more challenging for subsistence hunters in Angoon to harvest sufficient deer for their needs*." But according to ADF&G data, over the last two decades there has been a ***decrease*** in both the number of FQU and NFQU.

The FSB operates under ANILCA guidelines and the federal code of regulations that govern when and why any closures to NFQU can happen: "*With respect to subsistence uses of a particular fish or wildlife population, the Board may only approve a proposed closure if necessary for reasons of public safety, administration, or to assure the continued viability of such population (ANILCA §816(b), 36 CFR 242.10(d)(4)(vii) and 50 CFR 100.10(d)(4)(vii)).* ***Meanwhile, the Board may approve a proposed closure of nonsubsistence uses of a particular fish or wildlife population for any of these same reasons, or if necessary for the conservation of healthy populations of fish and wildlife,***

or to continue subsistence uses of such population (ANILCA §815(3), 36 CFR 242.10(d)(4)(vi) and 50 CFR 100.10(d)(4)(vi)). [1]

The Board should vote down this proposal based on the above guidelines of when any restrictions or closures on federal lands for NFQU are allowed to happen.

WP22-09 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) are closed to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users hunting under these regulations.

OPPOSE

Refer to our comments on WP22-07

WCR22-01 Deer Prince of Wales closed Aug. 1-15, except by Federally qualified subsistence users; non- Federally qualified users may only harvest 2 bucks

Rescind closure to NFQU on Price of Wales Island

WCR22-45 Caribou Unit 23 - Portions of Unit 23 - closed to non- Federally qualified users

Rescind closure to NFQU in those portions of Unit 23

Thank you for the opportunity to comment.

Sincerely,

Mark Richards
Executive Director Resident Hunters of Alaska

[1] https://www.doi.gov/sites/doi.gov/files/uploads/closure-policy-revised-2020-08-04.pdf

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

Mark Sams <msams@pndengineers.com>
Mon 7/19/2021 7:53 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Attention: Teo Matuskowitz

I would like to make a few opposition comments on the below listed federal subsistence deer hunting proposals

WP22-07
I oppose this change to the deer hunting regulations on the Chatham straight side of Admiralty Island. The regulation will only isolate one user group which has a very low impact on the area due to the distance from Juneau. Due to the distance Juneau residence do not regularly access this area since it is more than 1.5-2hr run time. All other local communities are subsistence communities including, Petersburg, Kake, Tenekee, and Hoonah, leaving Juneau, the furthest community from the location a user group that would be isolated. I think it would be very easy to look at the hunting records collected by the state of Alaska every year to determine how much pressure Juneau actually has on the location to determine how much this change in regulations would actually effect the overall hunting pressure.

WP22-08
I oppose this change to the northern Chichagof Island since it again singles out a single user group. I currently Own a cabin on norther Chichagof Island but am a Juneau resident. This proposed change would limit my access to deer hunting at my cabin which I have invested heavily in over the past 5 years to use as a place to hunt. For me, the area is difficult to access from Juneau due to weather and distance, over 2hrs. Again if you look at hunting records, I believe you would find Juneau residences have a limited impact on the overall harvest on Norther Chichagof Island.

WP22-09
I oppose this change in regulations for closing deer hunting in Lisianski Inlet. This area is also very remote and very difficult for non-subsistence hunters, Juneau residence, to access. Hunting records should show that this area is seldomly access from Juneau this time of year due to weather so this proposal will have little effect on competition. The only residences this change will effect are from Juneau since access is limited to Pelican and Elfin Cove.

In general I believe instating restrictions that only effect one group is a poor decision that becomes a slippery slope for other communities to make similar requests. Pretty soon, Juneau would have very limited hunting locations in a National Forest that is supposed to be managed for all user groups. If subsistence user groups are having difficulty harvesting deer, maybe that's an indication that the bag limits for all groups are to high and a better proposal would be to limit all harvest verses a single user group that has low impact on all three proposed areas. Another option would be to limit the ability to proxy hunt. I know fishermen can go out and

get to these remote places in the winter and shoot more deer than their limit due to proxy hunting. I understand the need for it in certain instances, but maybe limiting the number of proxy tags allowed to hunt at one time would help spread the pressure out over a longer period and less deer would be harvested. This would reduce the overall pressure and competition for sub-subsistence harvesters.

Historically these areas being proposed, as all deer habitat, is far more effected by weather and old growth timber harvests(heavy snow and large scale timber clear cuts) than the limited number of hunters. When these environmental and man-made (timber harvest) factors affect the population, all hunters are effected equally.

These proposed changes will also hurt any non-resident hunting charters that are based out of these local communities, hurting the local economies. Non-resident hunters will bring a large boost to these small communities at the end of the typical tourist season helping fortify the community with funds to weather the winter. Out of town hunters will not use Angoon based on the proposed WP22-07 since they would be very limited in hunting locations.

Thank you for taking the time to read my comments.

Mark Sarns
Owner of Cabin in Freshwater Bay, Directly effected by 2 out of three of these proposed changes.

[EXTERNAL] Opposition of Federal subsistence proposals Southeast Alaska for deer WP 2207, wp2208, wp2209, wp2210, wp 2212

CHARLES SCHULTZ <cjs16@me.com>

Sun 7/18/2021 3:53 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>
Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Attention Theo Matuskowitz,
Office of Subsistence Management

I am writing to oppose the federal subsistence proposals that affect Southeast Alaska Deer hunting. I oppose WP2207, WP22-08, WP22-09, WP22-10, and WP22-12.
Proposals WP22-07, WP 22-08, WP22-09 and prevents non-qualified subsistence users from access to deer hunting on public lands. As an Alaskan resident I also rely on deer meat as a primary source of red meat that is locally available. Limiting non-qualified subsistence users from access to hunt deer in areas around Angoon, Hoonah and Pelican is entirely unfair to those who live in other areas of the state, who are non-qualified Subsistence hunters. There is no science to suggest that the over harvest of deer is related to non-qualified subsistence users, in fact I would suggest that the over harvest in the areas around Hoohah, Angoon, and Pelican may actually be from the subsistence users who may be killing every available deer seen in late season, on the beach and uncaring if the deer is antlerless and uncaring of size. Preservation of breeding antlerless deer may prove to allow fawn bearing deer an opportunity to give birth in the spring. Also education of subsistence hunters to harvest mature deer would improve the size of deer and thereby increase the available pounds of edible meat.

Extending the season in unit 6 is exactly a dichotomy of what the Subsistence Board may be wanting to achieve. The complaint of less harvestable deer will only be compounded if deer seasons are extended during their most vulnerable times. Then the subsistence deer harvest will continue to over extend the available deer to breed for next year, and likely they will complain that non-subsistence harvest is the blame.

Hunters of deer need equal access to public lands. We are all Alaskans trying to provide natural, local deer meat.

Please take the comments of non-subsistence hunters into consideration.
Also consider making all Alaskans subsistence users. We all live here. We all have subsistence needs, not based on size of community we live in.

Thanks for your consideration ,
Charles Schultz
Juneau, Alaska

SCI Alaska Chapter
Eagle River, Alaska 99577
Cell (907) 903-8329
Tel: (907) 980-9018
www.aksafariclub.org

July 19, 2021

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

[Electronic Submission]
subsistence@fws.gov

RE: SCI-AK comments on Wildlife Proposal 22-07 Admiralty

Dear Chairman Matuskowitz,

The Safari Club International Alaska Chapter (SCI-AK) writes in opposition to Wildlife Proposal 22-07 (WP22-07). Founded in 1971, Safari Club International is the country's leading hunter rights advocate and additionally promotes worldwide wildlife conservation. SCI-AK is nationally and internationally recognized for its contributions in support of SCI's four major mission areas: Advocacy, Conservation, Education, and Humanitarian Services.

WP22-07 is counter to our goal of ensuring fair and equitable access to game resources in Alaska. The below comments focus on the indices of deer abundance, deer hunter effort, and harvest in Alaska Game Management Unit 4 (GMU 4) as reasons to reject WP22-07.

The proposal claims that non-federally qualified users (NFQU) are unfairly competing with federally qualified users (FQU) when hunting Sitka black-tailed deer in GMU 4. WP22-07 asserts that the deer population on western Admiralty Island is depleted and that in recent years FQUs have had difficulty meeting their subsistence needs because of increasing competition from NFQUs. Alaska Department of Fish and Game (ADF&G) analysis of deer population, hunter effort, and harvest trends found no support for either contention. Instead, the available indicators support that deer remain abundant throughout GMU 4.

GMU 4 encompasses the ABC Islands (Admiralty, Baranof, and Chichagof) and the surrounding archipelago. Hunters residing in Southeast Alaska (GMUs 1-5), excluding 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 to January 31 with a bag limit of 6 deer (bucks only August 1 – September 14). The current State season is August 1 to December 31 with a bag limit of 6 deer (bucks only August 1 – September 14). In 2019, the Alaska Board of Game increased the deer bag limit in GMU 4 from 4 to 6 deer because of the GMU's uniquely healthy population of Sitka black-tailed deer.

GMU 4 consistently shows a high black-tailed population. Pellet group counts are usually well above the high-density threshold and are often double the counts in other GMUs. Aerial surveys — measured in deer/hour sighted — were conducted for two locations in GMU 4, Southern Admiralty Island (2015-2017) and Northeast Chichagof Island (2017-2018). Southern Admiralty had the highest deer/hour of any survey area in Southeast Alaska and estimates from Northeast Chichagof were similar to Prince of Wales Island (POW) and higher than all other survey areas except Southern Admiralty and POW.

Management biologists in GMU 4 began conducting beach mortality transects in the early 1990s. Although these mortality surveys are a relatively insensitive indicator of population trend, they are an indicator of mortality resulting from severe

winters. 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. Yet, based on harvest and other indicators of deer abundance, managers believe the deer population had fully recovered by the 2013 season.

GMU 4 Sitka black-tailed deer are usually above the high-density threshold and are often double the counts in other GMUs. Although the area affected by this proposal is rarely sampled, this broad index of deer abundance suggests the GMU 4 population remains at high levels with no indication of depleted populations or conservation concerns. Taken together, these indices of deer abundance — pellet group surveys, alpine counts, mortality transects — suggest this proposal cannot be based entirely on a conservation concern.

Overhunting is often used as a justification for area closures or implementation of restrictive conservation measures. ADF&G produces estimates for hunter effort and harvest using information provided by hunters. To hunt deer in Southeast Alaska all hunters must obtain harvest tickets. Since 2011 harvest tickets have come with a mandatory reporting requirement. From 1997-2019 the estimated average annual harvest in GMU 4 has been 5,725 deer taken by 3,282 hunters. GMU 4 supports the highest deer harvest in the state and the historical harvest has remained fairly stable with between 5,000-7,000 deer harvested annually. The exception being the severe winter of 2006/2007 when high harvest was followed by significant overwinter mortality of deer throughout GMU 4. This resulted in a precipitous decline in harvest from 7,900 deer in 2006 to 1,932 deer in 2007.

Long-term records indicate a declining trend in harvest for both FQUs and NFQUs. From 1997 to 2006, FQUs harvested on average 152 deer annually. Since 2013, FQUs have harvested an average of 49 deer annually. This represents an approximate 70% decline. There is a similar pattern for NFQUs, who averaged 349 deer annually from 1997-2006. Since 2013, that average has declined to 115 deer annually. SCI-AK notes hunter numbers are decreasing across the board on a national level, not just in Alaska or even GMU 4. This proposal will further restrict access for hunters and lead to a further decrease in the number of hunter's in one of the state's most viable hunting regions.

The Alaska Board of Game has also established an annual amount reasonably necessary for subsistence (ANS) for deer in GMU 4 of 5,200-6,000 deer. ANS differs from the undefined term "subsistence need" used in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Under Alaska law, ANS is the harvestable portion of a game population that is sufficient to provide a reasonable opportunity for subsistence uses. "Reasonable opportunity" is that which allows a normally diligent hunter a reasonable expectation of success. The board establishes an ANS for a game population through review of long-term population and harvest information. With deer harvest levels within the recommended ANS range, the argument that the closure needs to occur in order to benefit ANS users is moot.

SCI-AK members are especially supportive of family hunting traditions because learning to hunt starts with family and community mentors. FCU status is not inherited. Children who leave federally qualified communities to attend school elsewhere will be excluded and harmed by WP22-07. In November, many FCUs invite their family members home for peak season deer hunts. Other NFCUs return to traditional hunting areas to harvest deer on state hunting proxies or kill deer on their limit to share with family, friends, or elders. None of this use would be allowed to continue in the WP22-07 area if it is passed.

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, the department has concluded that there is no conservation concern for the GMU 4 deer population. With deer population remaining high and stable, harvest within its historical range, and state ANS requirements being met it is unnecessary to restrict hunting in GMU 4 to the benefit of a small handful of users. WP22-07 will reduce the amount of deer meat coming into communities while simultaneously failing to provide conservation benefits to an already healthy deer population. SCI-AK urges you to not adopt WP22-07.

Thank you for your consideration.

John Sturgeon
SCI Alaska Chapter President
E-mail: president@aksafariclub.org
Cell: (907) 230-0072

Safari Club International Alaska Chapter
First for Hunters - First for Wildlife

[EXTERNAL] Wp22-08 wp22-07

isaiah Sipniewski <stansipak@gmail.com>
Thu 7/15/2021 8:09 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello,

I'm writing this email in regards to the recent proposals for restrictions on harvesting deer in the above subject line.

As a Juneau resident of 20 years I have enjoyed hunting these areas on chichicoff Island and the south end of admiralty Island.

I have a family cabin on admiralty at the southern end where dating back as far as my wife's grandfather, has used for hunting deer.
There is no decline in deer population and no reason why this area should be restricted to Juneau hunters. There are more than enough deer for those who choose to "break suction from there truck or boat seat" and hike to find deer.

I have family in hoonah who I have enjoyed staying with and hiking the mountains together. Taking my sons and teaching them how to navigate the mountains. On the road systems in hoonah I have enjoyed hiking to my favorite spots for as long as ive lived in Alaska.

I see no good reason why any of the 3 proposals should even be on the table.
If people are complaining of not enough deer it is due to their own laziness and unwillingness to hike into the woods for deer. There are more than enough for the surrounding residents and residents of Juneau.

Thank you for taking my comments into consideration.

Stanley sipniewski

[EXTERNAL] WP22-07

Scott Spickler <sspickler@gmail.com>
Mon 7/19/2021 10:21 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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I would like to urge you to not take action to implement these new regulations and suggested guidelines to ban non subsistence hunters in this region.

This is the first I have heard of these proposals and feel that you have not done a good enough job publicizing these policies to allow more hunters to respond.

The fish and wildlife in Alaska belong to all of us and you are tipping the scales to a select number of hunters to the detriment of all Alaskans and where will it ever end? Is the east side of Northern Admiralty island next?

This proposal is divisive and unnecessary and should be abolished.

Thank you,

Scott Spickler
10754 Horizon Dr
Juneau, AK. 99801

Sent from my iPad

[EXTERNAL] Subsistence Hunting Closure

Peter Strow <pstrow@hotmail.com>
Mon 7/19/2021 5:20 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello,

I would like to submit a commit regarding the closure of hunting to Juneau residents for WP22-07, WP22-08 and WP22-09. I don't believe these areas should be closed to Juneau hunters. Accessible hunting is difficult in Southeast Alaska and many Juneau residents depend hunting deer in these areas. Proposing these closings should be backed by scientific data and I think this needs to be further studied before any closures are passed.

Thank you,
Peter Strow

Sent from my iPhone

SPORTSMEN'S ALLIANCE

July 16, 2021

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

RE: Comments on WP22-07 Closure to non-Federally qualified users, Admiralty Island; WP22-08 Place a harvest restriction on non-Federally qualified users, Northeast Chichagof Controlled Use Area; WP22-09 Closure to non-Federally qualified users, Lisanski Strait; WP22-10 Lower harvest limits for non-Federally qualified users, Lisianski Strait;

Dear members of the Federal Subsistence Board:

The Sportsmen's Alliance is a leading national organization that defends the right of our members to hunt, fish and trap in all 50 states. I am writing today to urge you to use sound scientific evidence to discharge policy related to changing existing hunting seasons, harvest limits and methods and means of taking wildlife related to federal subsistence hunting and trapping and more specifically proposals WP22-07, WP22-08, WP22-09 and WP22-10.

The Sportsmen's Alliance strongly believes that if populations are abundant than all public land users in the Alaska should have access to these lands for hunting and trapping. These lands are managed and conserved using public funds contributed by sportsmen across Alaska and the United States through license fees and excise taxes paid on the purchase of firearms and other hunting equipment.

When determining whether to close certain federal lands to land users that are non-subsistence hunters, the Alliance on behalf of our Alaska members urge you to follow scientific evidence and population data to determine the best course of action. If wildlife populations numbers indicate abundant numbers of game species these lands should remain open to both subsistence hunters and non-subsistence hunters. The North American Model of Wildlife Conservation dictates that science should be the guiding tool for discharging wildlife policy and our membership stands firmly on the principles of this model.

We understand the complex nature of this decision, so we urge you to make these determinations based solely on science and not based on political or social pressure. Thank you for the opportunity to comment on this issue and thank you for your time.

Best,

Jacob Hupp
Sportsmen's Alliance
Associate Director of State Services

[EXTERNAL] Opposition

Luke N. Taintor <ltaintor@bartletthospital.org>

Mon 7/19/2021 2:45 PM

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

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I oppose the new regulations on that subsistence hunters are making that drastic of an impact on the deer population numbers. The numbers don't support the claims. Thank you for your time

My house rules are be kind yourself, be kind to others, and be kind to nature. I hope you guys make the right choice.

[EXTERNAL] Opposition to WP22-07, WP22-08, WP22-09

Brandon Ivanowicz <blvanowicz@pndengineers.com>

Mon 7/19/2021 4:11 PM

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

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Attention: Theo Matuskowitz

The intent of this email is to be on record in my opposition to the following proposals:

- WP22-07
- WP22-08
- WP22-09

I support the views of the Terrritorial Sportsmen, Inc. of Juneau and the Alaska Department of Fish and Game in their opposition to these proposals. Please see the attachment. Thank you. Brandon Ivanowicz.

There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters! - Territorial Sportsmen

Territorial Sportsmen

Representing the sporting lifestyle of Southeast Alaskans

There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters!

Posted on July 17, 2021 by territorialsport in Homepage

Comments on these are due by this Monday, July 19, 2021 (email: subsistence@fws.gov or fax: 907-786-3898).

The first proposal (WP22-07) is a closure of most of west Admiralty Island September 15 – November 30 for Juneau hunters. This includes all areas south of Hawk Inlet. Here are TSI's comments opposing that proposal (& supporting ADF&G):

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-07) to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort is also declining. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

TSI opposes this proposal and respectively asks that it not be adopted.

The second proposal (WP22-08) reduces the bag limit from 3 to 2 deer for the Northeast Chichagof Controlled Use Area (NECCUA – Hoonah & Tenakee areas). Here are TSI's comments opposing that proposal (& supporting ADF&G):

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-08) to reduce the deer hunting bag limit to 2 deer within the Northeast Chichagof Controlled Use Area (NECCUA) for non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on in NECCUA, ADF&G increased the annual bag limit from 4 to 6 deer west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort have remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer (compared to 3 deer for NFQUs). This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

TSI opposes this proposal and respectively asks that it not be adopted.

The third proposal (WP22-09) is a closure of Lisianski Inlet, Lisianski Strait, & Stag Bay on Chichagof Island October 15 – December 31. Here are TSI's comments opposing that proposal (& supporting ADF&G):

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-09) to close deer hunting in Lisianski Inlet, Lisianski Strait, & Stag Bay on Chichagof Island from October 15 to December 31 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort has remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

Dillon Tomaro <dillonpaultomaro@gmail.com>
Mon 7/19/2021 9:06 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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I would like to make a few opposition comments on the below listed federal subsistence deer hunting proposals

WP22-07

I oppose this proposed change to the 2022 regulations. I have been hunting south of Hawk Inlet towards and beyond Angoon my whole life and I have not witnessed any decrease in deer population other than the years following an excessive amount of snow that caused the yearlings to die. I have had nothing but pleasant encounters with the hunters of Angoon and they always seem to kill more deer than us at ease with their local knowledge (same concept that I would have a better knowledge of the landscape, and therefore the upper hand with hunting in the Barlow area). That is some of my favorite hunting territory with all of the old growth that you cannot find north of Hawk Inlet. I also enjoy hunting Florence Lake which would be affected by this proposal. Rarely do I encounter other hunters from Juneau when I am hunting South of Hawk Inlet and I believe this should be easy to see by looking at peoples hunting reports. I do not think that the Juneau residents' impact on the deer population south of Hawk inlet is significant at all and there is no way that it is hurting the Angoon residents' harvest needs. If this proposal goes through then to be fair, the Angoon residents should not be able to hunt north of Hawk Inlet (even though it is the same case that their hunting has no impact on Juneau residents deer population). There has been no problem in the past with Juneau residents affecting the Angoon residents hunting opportunity and I believe it is simply unfair to go through with this proposal.

WP22-08

I oppose this proposed change to the 2022 regulations. I believe that again the Juneau resident impact is very low in this area.

Thank you for taking the time to read my comments.

Dillon Tomaro

Lifelong Southeast Alaska Hunter

[EXTERNAL] Comment on WP22-08, WP22-09, WP22-07

John Unzicker <jmunzicker@gmail.com>
Wed 6/30/2021 8:56 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Hello,

This comment is regarding the following proposals:
WP22-08, WP22-09, WP22-07

We are all Alaska state residents and have the right to utilize all of the state land regardless of our primary residence. As a lifelong Juneau resident who pays the same fees to hunt game in SE AK as anyone else in the state, I am extremely discouraged by these proposals.

Juneauites would be forced out of major hunting areas during the prime time of the season. If Juneau residents are not allowed to hunt the far, outlying areas, we will all be forced to hunt the immediate areas around Juneau which will result in over-hunting, overcrowding, and less game around Juneau. This proposal is absolutely inequitable and will divide communities.

What about hunters who have cabins or family in Hoonah, Pelican, or Angoon? This is absolutely wrong and only goes to serve a very small population of the state. Residents of Juneau have just as much right to hunt these zones as the residents of Hoonah, Pelican, and Angoon have the right to hunt anywhere in the state. There is enough wildlife and land for everyone to utilize for subsistence and it should be shared equally.

And does this mean that any other resident not from Juneau can hunt these areas? Sitka? Haines? Gustavus? Petersburg? Why only Juneau?

Thank you,
John Unzicker
2016 Glacier Bear Blvd.
Juneau, AK. 99801
907-723-3191

[EXTERNAL] Public comment on WP22-07

akmac93@gmail.com <akmac93@gmail.com>
Mon 7/19/2021 8:30 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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This email is in relation to proposal WP22-07.

I strongly feel that this proposal will greatly diminish non-subsistence use of the unit. Furthermore deer populations and animal take are both robust In the proposed area, there is ample deer for both user groups participating in the take of deer.
I Mac Wilson oppose WP22-07

Thank you for your consideration.

Sent from my iPhone

[EXTERNAL] proposals WP22-7, WP22-8 and WP22-9

Luke Woodruff <alaskan_waters@yahoo.com>
Wed 6/30/2021 9:23 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Please do not consider the new proposals WP22-7, WP22-8 and WP22-9 as new regulation. I do not believe the current deer harvest levels combined with predation/winter kills deem this kind of proposal necessary. Subsistence and non subsistence communities alike count on deer as a part of their diet along with fish, water fowl and berries. Every year is different, sometimes hunting is difficult and other times not. Let's avoid creating regulations that favor one group over another because one group thinks they are having to work harder.

Luke Woodruff
Juneau, AK

Sent from Yahoo Mail for iPhone

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

STAFF ANALYSIS
WP22-08

ISSUES

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

DISCUSSION

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

Existing Federal Regulation

Unit 4 - Deer

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

Proposed Federal Regulation

Unit 4 - Deer

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

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

Existing State Regulation

Unit 4 - Deer

Chichagof Island east of Port Frederick and north of Tenakee Inlet

Residents and Nonresidents - 3 deer total	*Bucks*	*HT*	*Aug. 1 - Sept.14*
	Any deer	*HT*	*Sept. 15 - Dec. 31*

Unit 4 - Deer

Remainder

Residents and Non-residents - 6 deer total	*Bucks*	*HT*	*Aug. 1 - Sept.14*
	Any deer	*HT*	*Sept. 15 – Dec. 31*

Extent of Federal Public Lands

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

Customary and Traditional Use Determination

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

Regulatory History

See Proposal WP22-07 analysis.

Biological Background

See Proposal WP22-07 analysis.

Habitat

See Proposal WP22-07 analysis.

Population Information

McCoy (2017) outlines the limitations of estimating deer populations, while Bethune (2020) discusses the most recent deer population status in Unit 4. Overall, the deer population in Unit 4 has recovered from the mortality incurred during the severe winters of 2006-2008 and is probably reaching winter carrying capacity in some areas. There have not been any significant mortality events recorded since 2008 and recent winters have been mild with no significant snowfall. McCoy (2019) explained that Unit 4 deer pellet-group counts in 2019 were higher than previous counts in all three survey areas. Pavlov Harbor, within the proposal analysis area (**Map 1**), was surveyed in 2019. Results indicate a 39% increase in pellet-groups from the last survey conducted in 2010 (McCoy 2010).

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

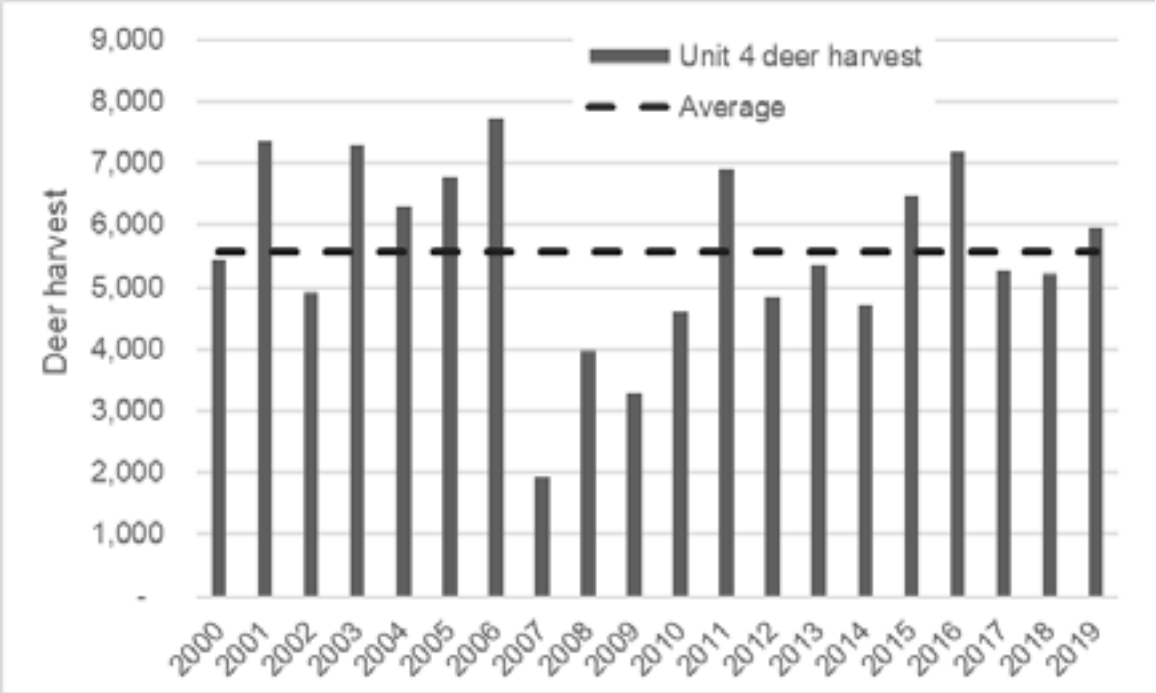


Figure 1. Unit 4 estimated annual legal deer harvest, 2000-2019.

Cultural Knowledge and Traditional Practices

Deer are an important subsistence resource for rural residents throughout southeast Alaska. In a 2012 survey of Hoonah residents, 59% of households reported attempting to harvest deer, 48% of households reported successfully harvesting deer, and 77% of households reported using deer (Sill and Koster 2017). An estimated 470 deer were harvested, for a total of 37,558 pounds, or 51 pounds per capita. The deer hunting areas documented in the survey were primarily northeast Chichagof Island east of Port Frederick and north of Tenakee Inlet (**Figure 2**). Sill and Koster (2017) also report that Hoonah respondents expressed concern about deer populations and harvests. Some respondents expressed concern that non-local hunters were taking too many deer and causing competition from over-crowding in the local areas and roads.

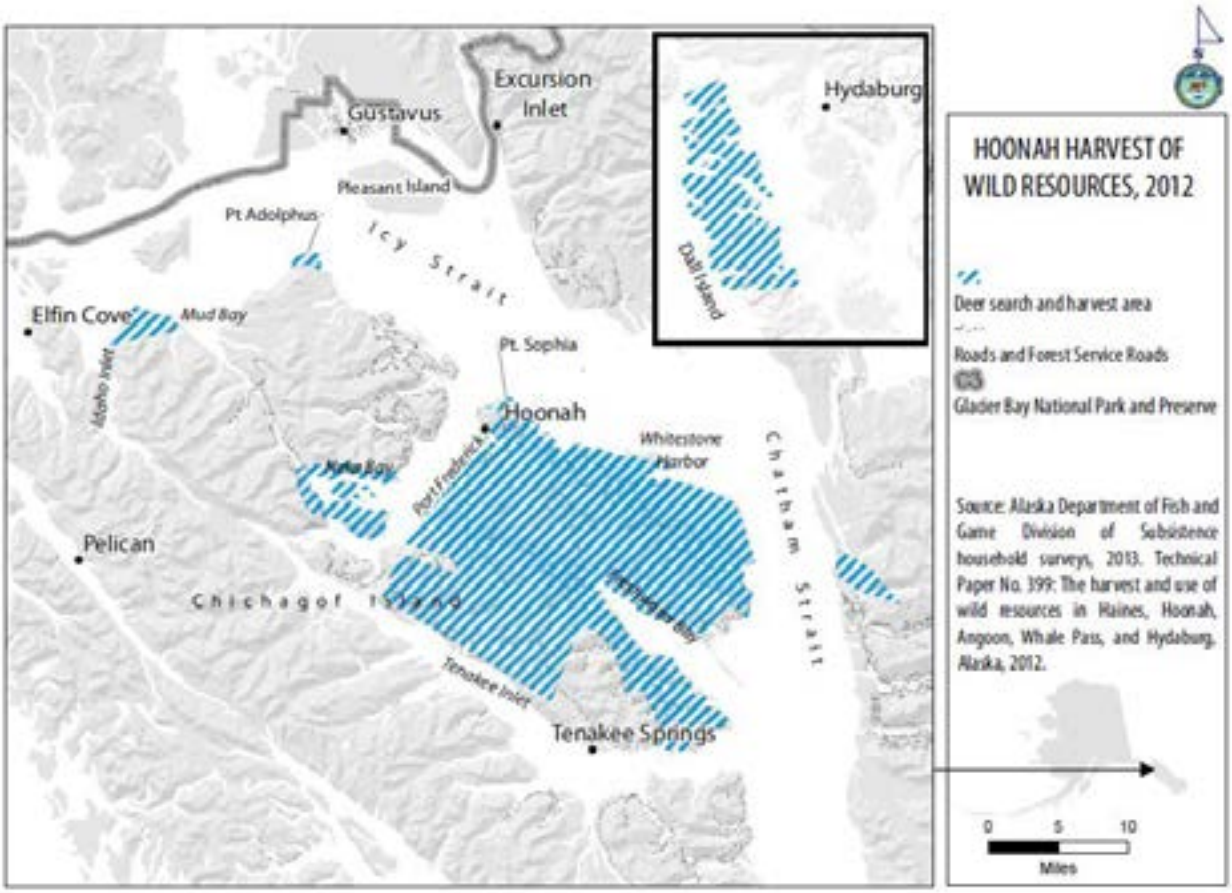


Figure 2. Reported deer hunting locations used by residents of Hoonah in 2012. From Sill and Koster 2017.

Hoonah and nearby communities maintain strong ties to Juneau as a commercial and economic hub, and many rural residents of the area move to Juneau for economic opportunities. Hoonah is the most populated place in the Hoonah-Angoon census area. The population has been stable since 2000 and was 782 in the 2019 census (Sill and Koster 2017; Alaska Department of Labor and Workforce Development 2020). Based on year-to-year changes in residency of Permanent Fund Dividend applicants, an average of 61 residents of the Hoonah-Angoon census area moved to Juneau each year between 2009 and 2020, while an average of 47 moved from Juneau to the Hoonah-Angoon census area (Alaska Department of Labor and Workforce Development 2021).

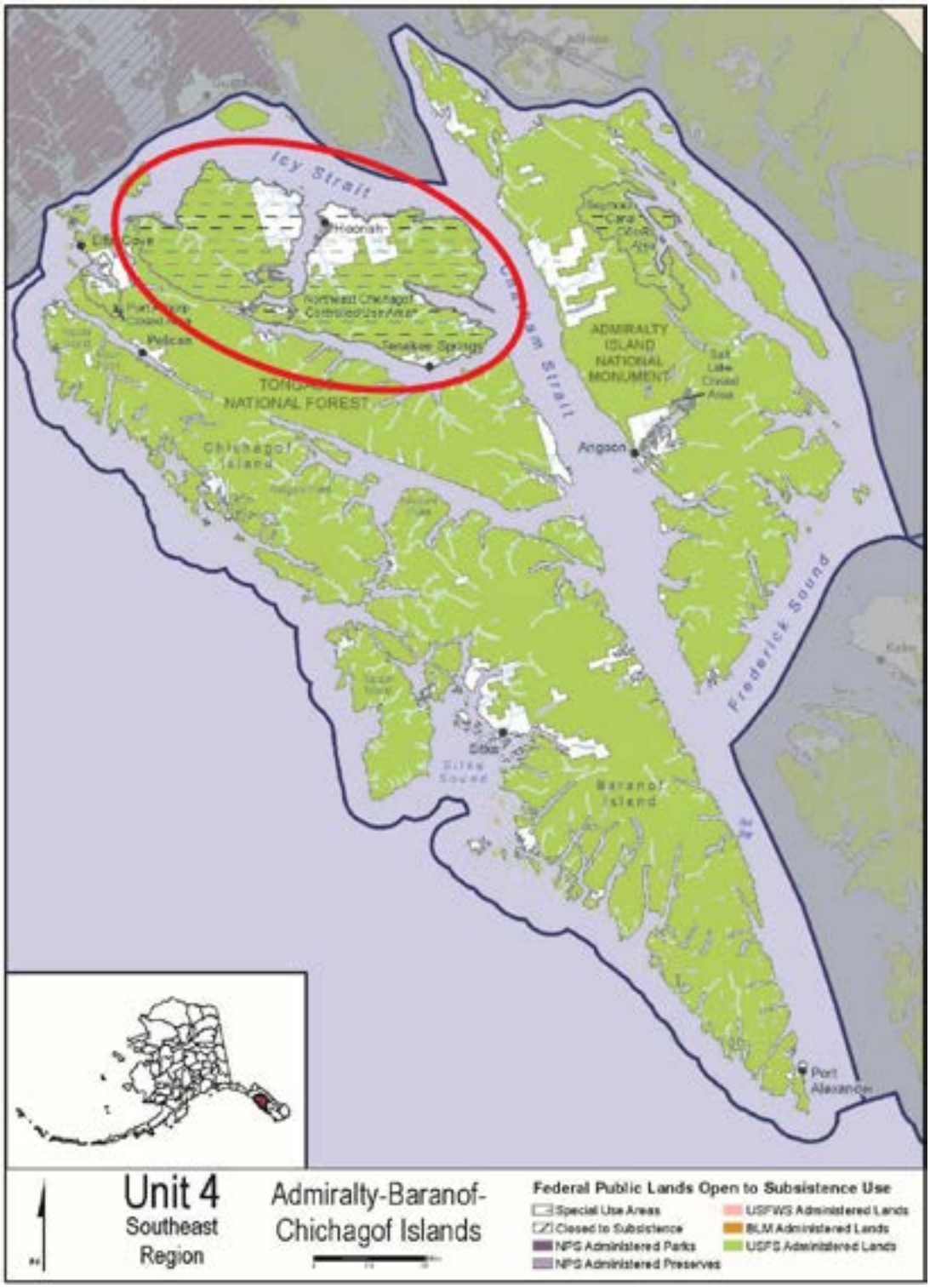
Harvest History

Through 2010, deer harvest data provided by the Alaska Department of Fish and Game (ADF&G) are based on a sample of hunters. In general, 35% of hunters from each community are surveyed each year and, while response rates vary by community, the overall response rate across communities is approximately 60%. Harvest numbers are extrapolated using expansion factors calculated as the total number of harvest tickets issued to a community divided by the total number of survey responses for that community. If response is low from a community, an individual hunter may have a disproportionate effect on the data. As confidence intervals are not available for these data, exact numbers should be considered estimates and used with caution. Trends, however, especially at larger scales, should be indicative of general population change. Since 2011, harvest data have been gathered through mandatory reporting.

ADF&G expands the harvest estimate based on the number of reports returned to account for unreturned harvest reports (Bethune 2020).

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

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



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

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

Harvest and effort by Federally qualified subsistence users and non-Federally qualified users in the relevant WAAs is presented in **Figures 3 and 4** below. Federally qualified harvest is higher in most years compared to other users (**Figure 3**) while effort, expressed in hunter days, is generally lower (**Figure 4**). Non-Federally qualified users have a lower success rate which results in higher hunting effort compared to Federally qualified subsistence users. Between 2007 and 2019, Federal subsistence harvest increased to a high in 2016 before dropping slightly (**Figure 3**). Over the same period, effort in days hunted appears to be decreasing from a high in 2015, with Federally qualified subsistence user hunt days dropping the most. Eighty-two percent of non-Federally qualified users harvest 2 deer or less annually from Unit 4 (**Figure 5**). Female deer harvest by non-Federally qualified users has averaged 17% since 2000, with a peak of 33% in 2017 (**Figure 6**).

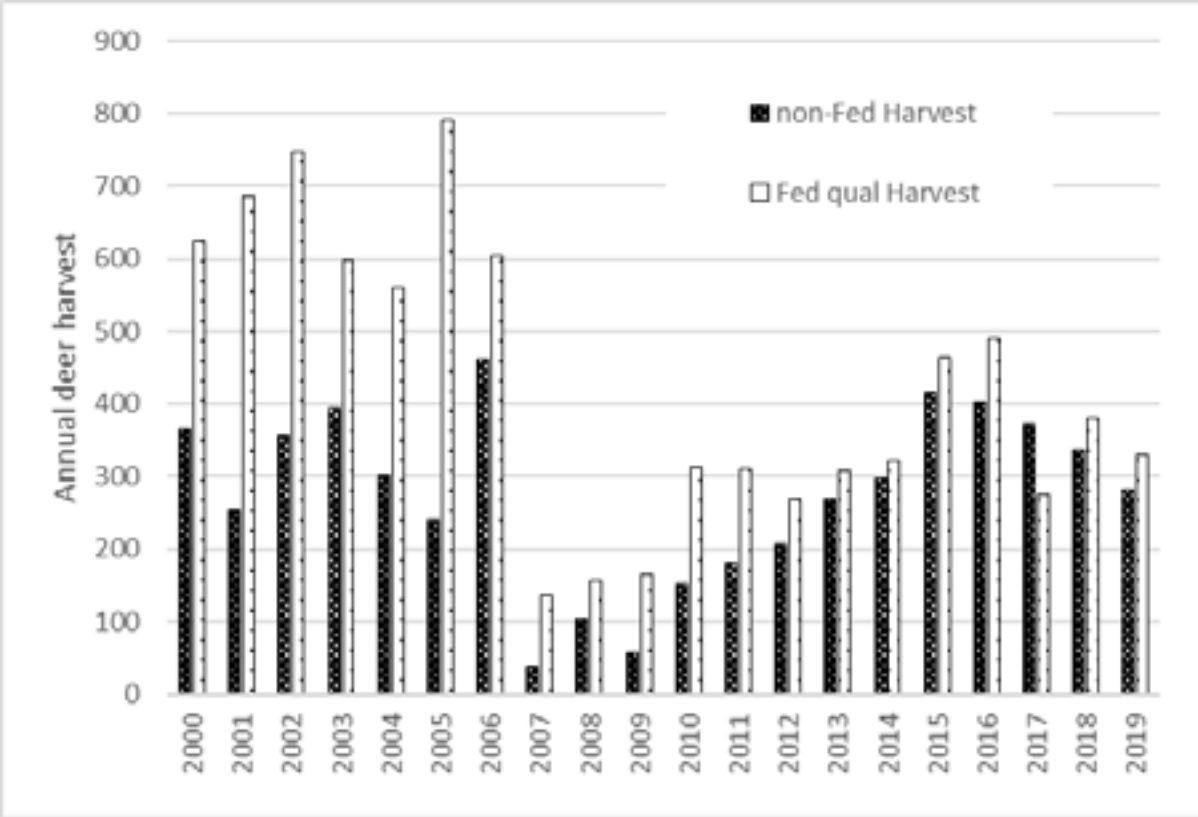


Figure 3. Annual deer harvest in the proposal analysis area, 2000-2019 (ADF&G unpublished data).

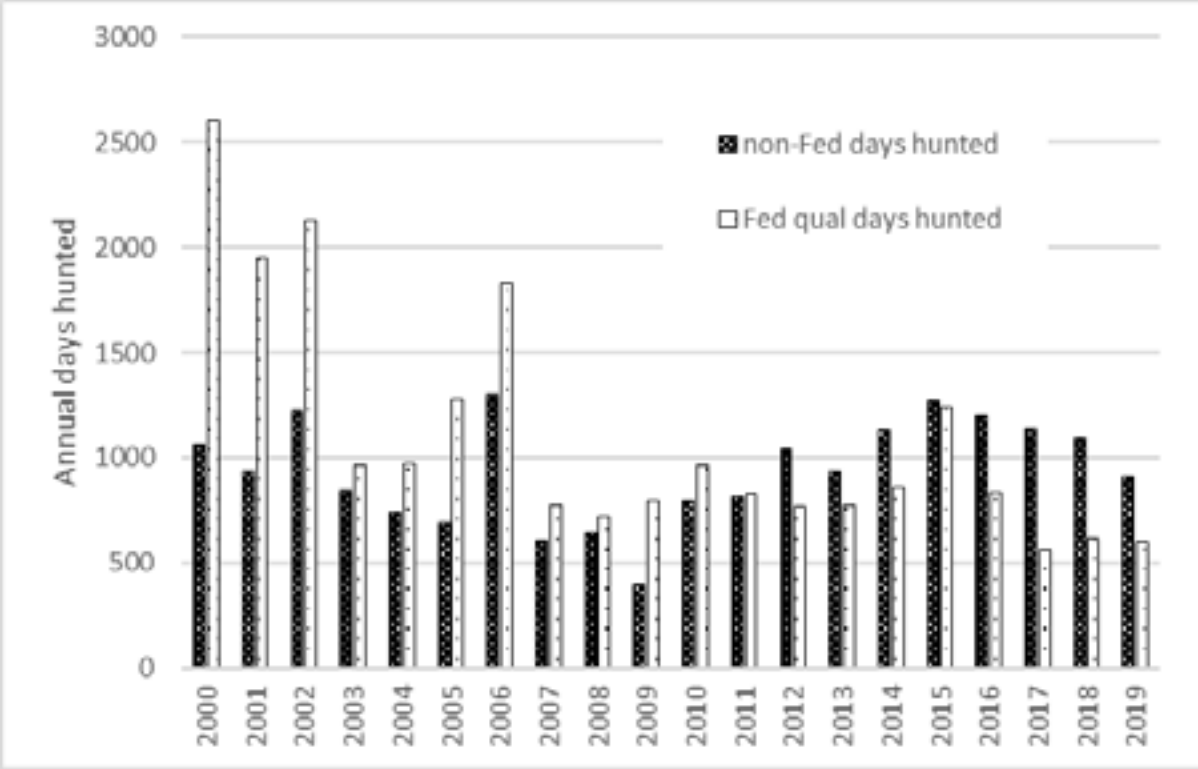


Figure 4. Annual effort, in hunter days, in the proposal analysis area, 2000-2019 (ADF&G unpublished data).

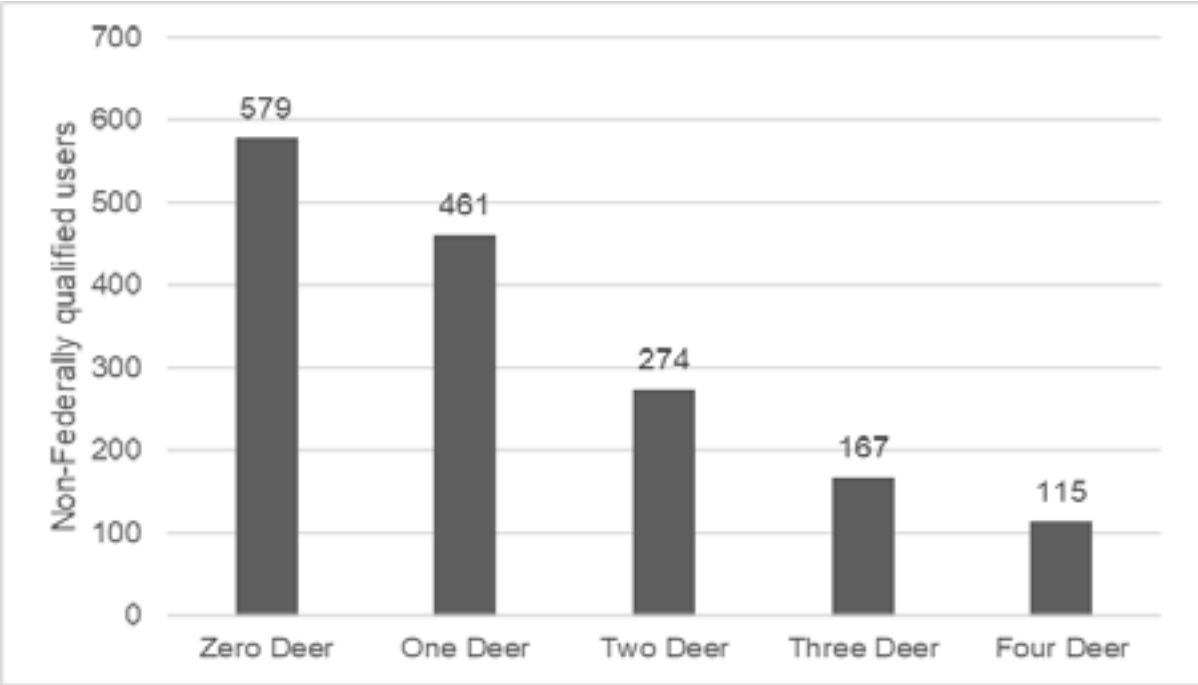


Figure 5. Average number of non-Federally qualified users harvesting 0-4 deer annually in Unit 4, 2000-2019 (AD-F&G unpublished data).

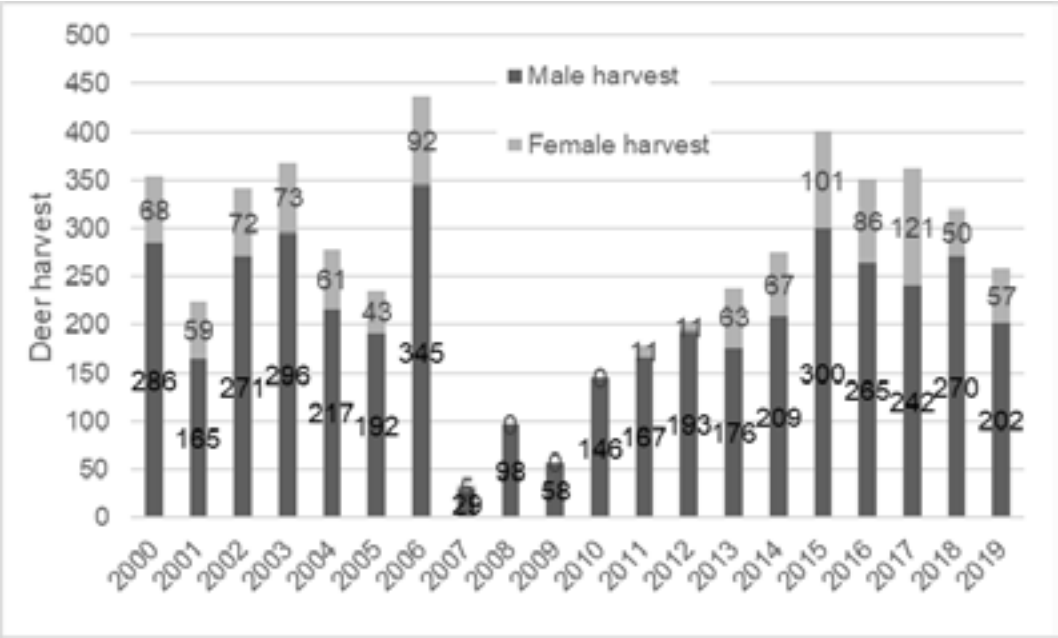


Figure 6. Number of male and female deer harvested by non-federally qualified users in NECCUA, 2000-2019. Female deer harvest was restricted 2007-2012. (ADF&G unpublished data).

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

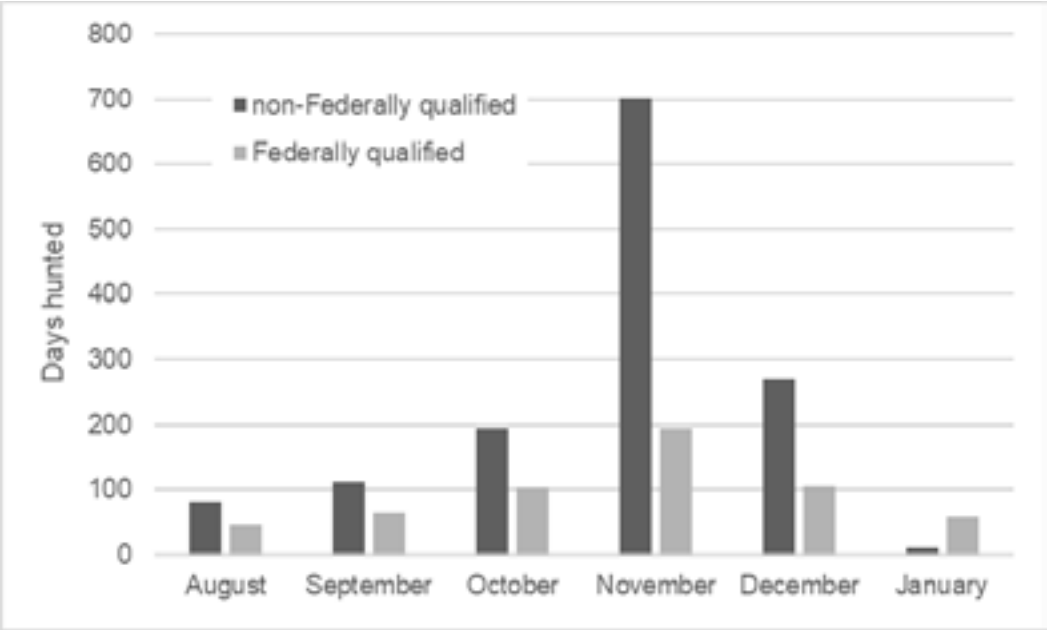


Figure 7. Average number of days hunted annually by Federally qualified subsistence users and non-Federally qualified users in Unit 4, 2000-2019 (ADF&G unpublished data).

Hunter success rate and the number of deer harvested per hunter, are indicators of whether user nutritional needs are being satisfied. For data management purposes, a hunt is considered successful when any num-

ber of animals is harvested on a single hunt. The success rate for residents of Hoonah and the number of deer per hunter has been trending up since 2009 (**Figure 8**).

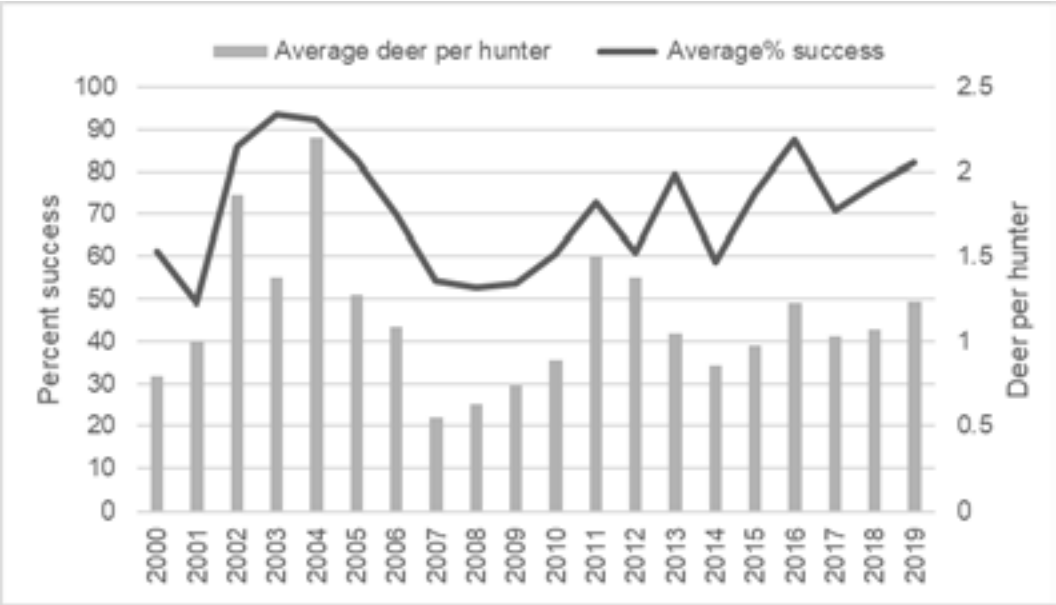


Figure 8. Hunter success rate and deer harvested per hunter for Hoonah residents hunting in Unit 4, 2000-2019 (ADF&G unpublished data).

Effects of the Proposal

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

OSM CONCLUSION

Oppose Proposal WP22-08.

Justification

Section 802(2) of ANILCA requires that subsistence uses by rural residents of Alaska shall be "the priority consumptive uses of all such resources on the public lands of Alaska." Section 804 provides a preference for subsistence uses, specifically "…the taking on public lands of fish and wildlife for nonwasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife

for other purposes." Section 815(3) provides that the Board may restrict nonsubsistence uses on Federal public lands if "necessary for the conservation of healthy populations of fish and wildlife, for the reasons set forth in section 816, to continue subsistence uses of such populations, or pursuant to other applicable law."

Restricting non-Federally qualified users to two male deer annually in the proposal area does not appear necessary because deer populations in Unit 4 are high and may be approaching carrying capacity in some locations.

Restricting non-Federally qualified users to two male deer annually in the proposal area does not appear necessary for the continuation of subsistence uses. The average annual success rate for Hoonah deer hunters has been increasing since 2008 and the deer harvested per hunter had rebounded to pre-2007 levels. Further, few non-Federally qualified users harvest more than 2 deer in Unit 4 and they harvest primarily males in the analysis area; therefore, the proposed restriction is not likely to significantly affect effort by non-Federally qualified users or the hunting experience of Federally qualified subsistence users.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Southeast Alaska Subsistence Regional Advisory Council

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

INTERAGENCY STAFF COMMITTEE COMMENTS

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

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

Wildlife Proposal 22-08

This proposal would reduce the bag limit for non-federally qualified users (NFQU) to 2 bucks within the Northeast Chichagof Controlled Use Area (NECCUA, Figure 1).

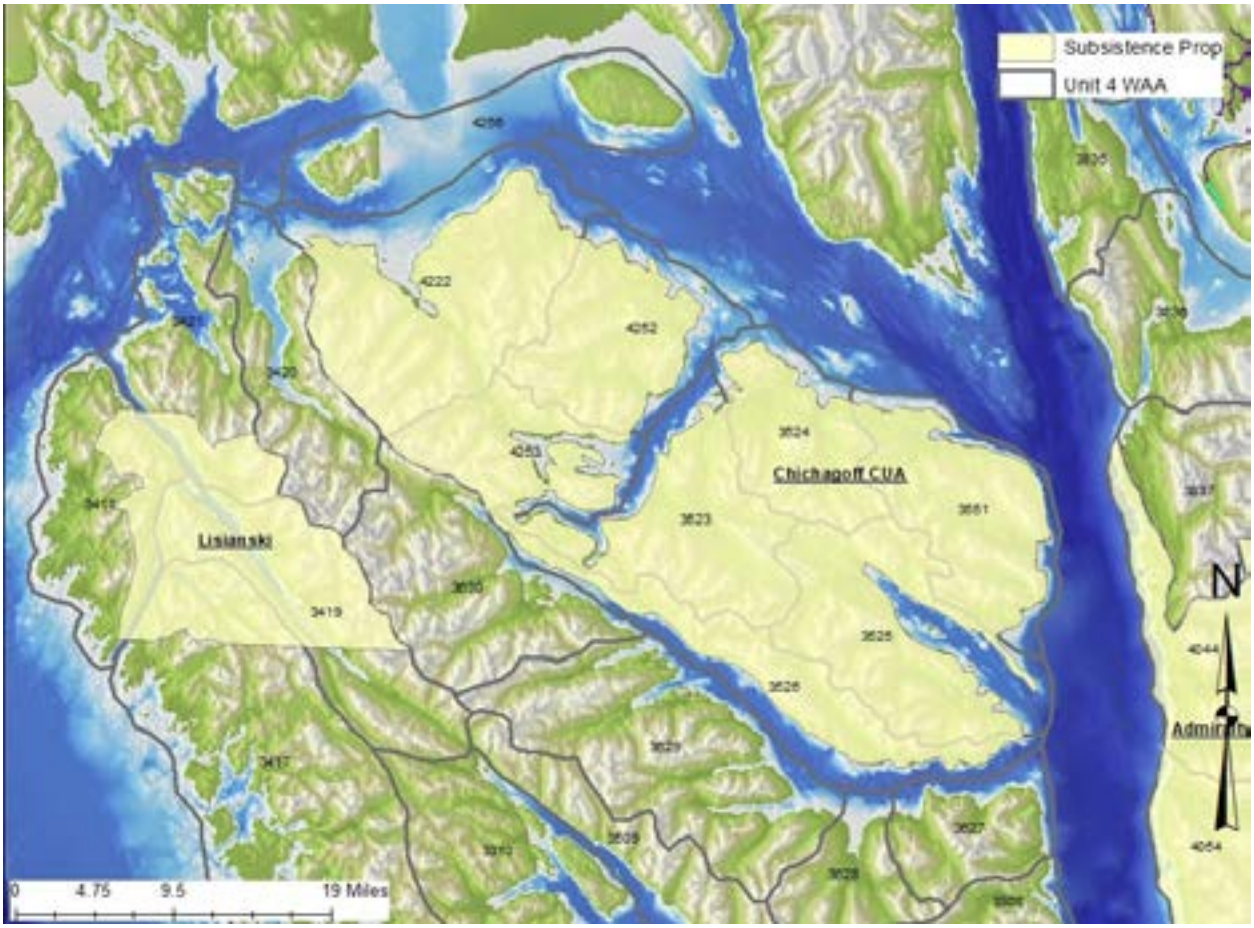

Figure 1. Map of the NECCUA proposal and boundaries of the ADF&G WAAs for deer hunter data used to analyze effects of the proposal.

Background

The Southeast Alaska Subsistence Regional Advisory Council (SERAC) claims that NFQUs are unfairly competing with federally qualified users (FQU) when hunting Sitka black-tailed deer. Currently within the NECCUA, NFQUs have a bag limit of 3 deer east of Port Frederick and 6 deer west of Port Frederick (bucks only August 1 – September 14). This proposal does not affect the current FQU bag limit for deer within the NECCUA (6 deer).

GMU 4 encompasses the ABC Islands (Admiralty, Baranof and Chichagof) and the surrounding archipelago. Hunters residing in Southeast Alaska (GMUs 1-5) excluding 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 to January 31 with a bag limit of 6 deer (bucks only August 1 – September 14). The current State season is August 1 to December 31 with a bag limit of 6 deer (bucks only August 1 – September 14) west of Port Frederick and 3 deer east of Port Frederick. In 2019, the Alaska Board of Game (BOG) increased the deer bag limit in GMU 4 from 4 to 6 deer (except the NECCUA east of Port Frederick which remained 3 deer) because there is such a healthy deer population within this GMU.

Under State regulations the NECCUA east of Port Frederick and north of Tenakee Inlet is treated separately from the remainder of GMU 4 with a more conservative bag limit. This area has been

extensively logged and features a network of logging roads that facilitate access for hunting. It is also prone to heavy snow and much of the deer winter range has been altered by clearcut logging.

The BOG has made positive customary and traditional use findings for deer in GMU 4 and established an annual amount reasonably necessary for subsistence (ANS) for deer in GMU 4 of 5,200–6,000 deer. ANS differs from the undefined term "subsistence need" used in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Under Alaska law ANS is the harvestable portion of a game population that is sufficient to provide a reasonable opportunity for subsistence uses. "Reasonable opportunity" is that which allows a normally diligent hunter a reasonable expectation of success. The BOG establishes an ANS for a game population through review of long-term population and harvest information. A portion of the state-designated Juneau Nonsubsistence Area extends into GMU 4 on northern and eastern Admiralty Island.

The indices of deer abundance, deer hunter effort and harvest in GMU 4 and withing the NECCUA are all important aspects to consider when reviewing this proposal. Deer abundance and trend 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.

GMU 4-Wide Population and Harvest

Monitoring deer abundance in forested habitat is challenging as deer cannot be directly counted through ground or aerial surveys. We present several types of survey data. Since the 1980s ADF&G has used spring pellet group counts to monitor broad (>30%) changes in deer abundance. Spring pellet group surveys are conducted in numerous US Forest Service Value Comparison Units across Southeast Alaska after snow melts and before spring green-up.

GMU 4 consistently has 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. Although the area affected by this proposal is rarely sampled, this broad index of deer abundance suggests the GMU 4 population remains at high levels with no indication of depleted populations or conservation concerns.

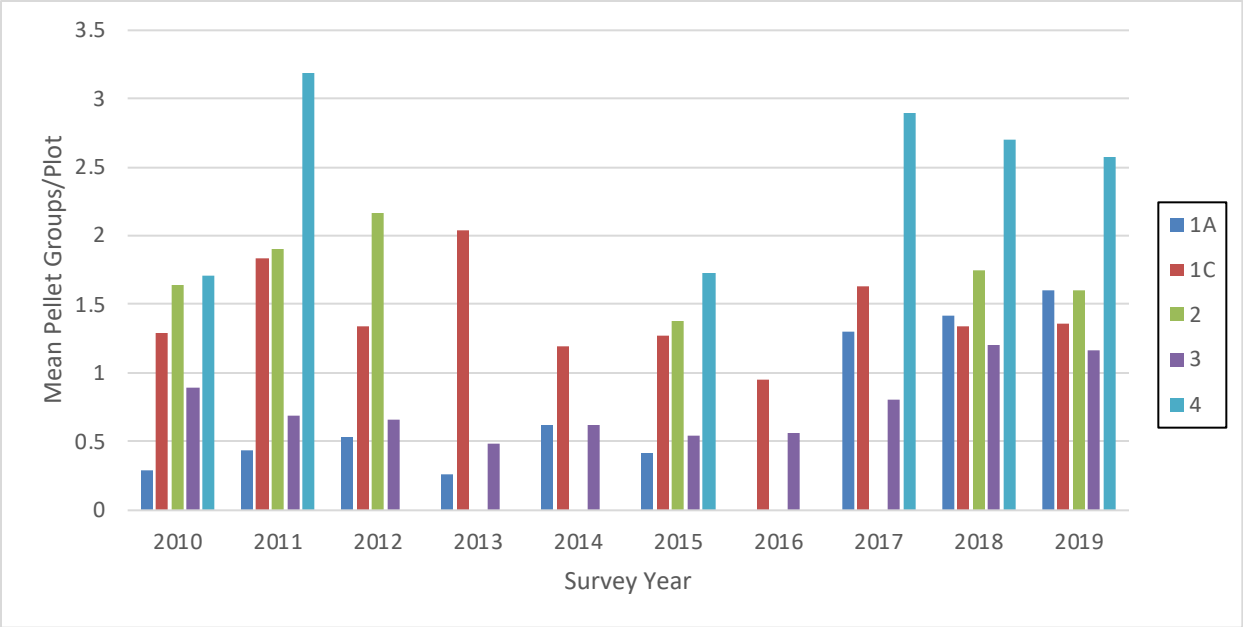

Figure 2. Mean number of deer pellet groups/plot for Southeast Alaska by GMU, 2010-2019**.**

In 2013 ADF&G began evaluating mid-summer aerial counts of deer in alpine habitat as an index of deer abundance. Surveys were conducted for 2 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. Estimates from Northeast Chichagof were similar to Prince of Wales Island (POW) and higher than all other survey areas except Southern Admiralty and POW.

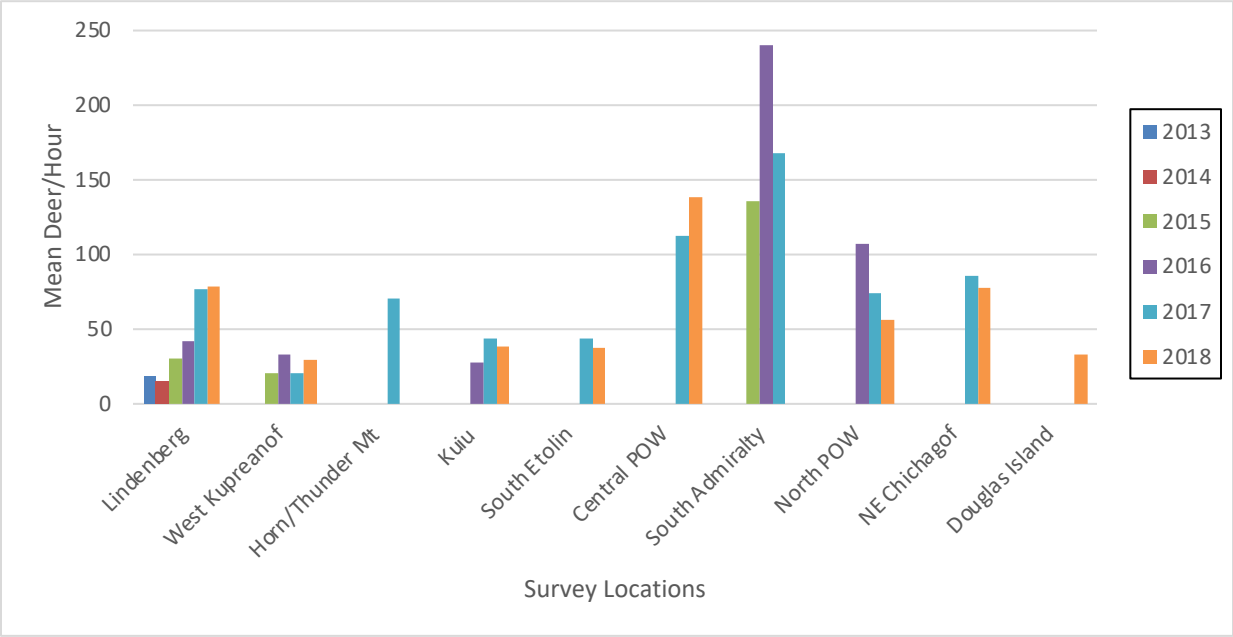

Figure 3. Mean number of deer counted per hour during mid-summer aerial alpine deer surveys in Southeast Alaska, 2013-2018.

Management biologists in GMU 4 began conducting beach mortality transects in the early 1990s. Although these mortality surveys are a relatively insensitive indicator of population trend, they are an indicator of mortality resulting from severe winters, 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 adult male, adult female 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 very high number of carcasses found during spring 2007 surveys (Figure 4). In the years since then, few carcasses were found indicating high overwinter survival and no winter related population declines.

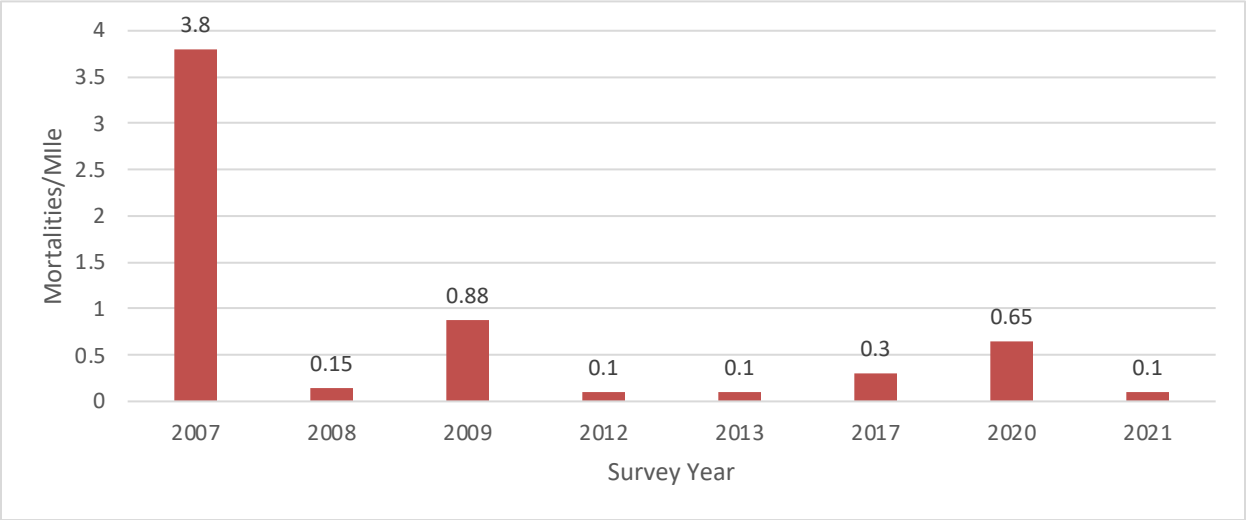

Figure 4. Mortalities per mile of beach transect conducted in GMU 4.

Taken together, these indices of deer abundance (pellet group surveys, alpine counts, mortality transects) suggest 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 deer population.

Hunter Effort and Harvest

GMU 4 managers also use harvest as an indicator of trend in the deer population. ADF&G estimates hunter effort and harvest using information provided by hunters. 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 deer they harvested.

Since 1997 the estimated average annual harvest in GMU 4 has been 5,643 deer taken by 3,275 hunters (**Figure 5**). GMU 4 supports the highest deer harvest in the state. Harvest has remained fairly stable with between 5,000-7,000 deer harvested annually. The exception being the severe winter of 2006/2007 when high harvest was followed by significant overwinter mortality of deer in GMU 4. This resulted in a precipitous decline in harvest from 7,734 deer in 2006 to 1,933 deer in 2007. Based on harvest and other indicators of deer abundance, managers believe the deer population had fully recovered by the 2013 season.

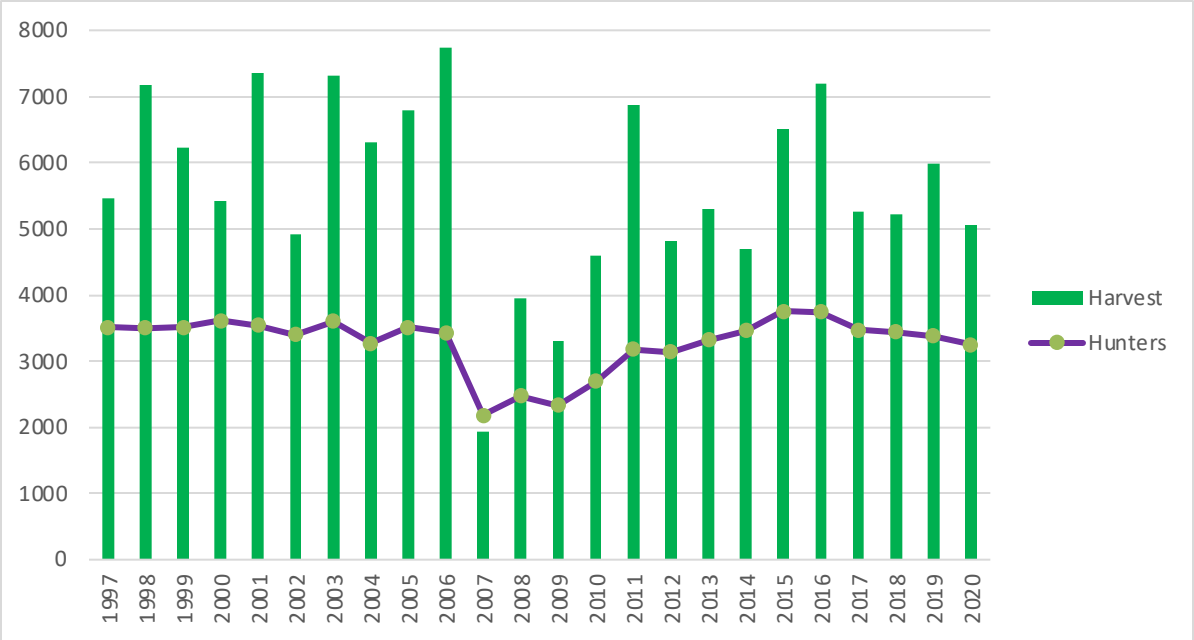

Figure 5. Numbers of people hunting deer and estimated deer harvest for GMU 4, RY97-RY20.

Data Summaries for Impacted Area

The following analyses present data summarized for FQUs and NFQUs in the 8 ADF&G Wildlife Analysis Areas (WAAs 3523-3526, 3551, 4222, 4252 and 4253) that intersect with the area this proposal covers (**Figure 1**). WAA boundaries generally correspond with watersheds and are the finest scale at which data can be meaningfully summarized. For this proposal, WAA boundaries directly correspond to the proposal area.

Long-term records indicate a declining trend in harvest for FQUs and a stable trend for NFQUs (Figure 6). From 1997 to 2006, FQUs harvested an average of 747 deer annually. Harvest by FQUs declined following the severe winter of 2006/2007. Since 2013, when ADF&G considered the deer population recovered, average annual harvest by FQUs grew to an average of 401 deer annually but remains about 50% lower than prior to RY07. Harvest by NFQUs also declined following the winter of 2006/2007 but has returned to approximately 90% of pre-2007 levels (**Figure 6**).

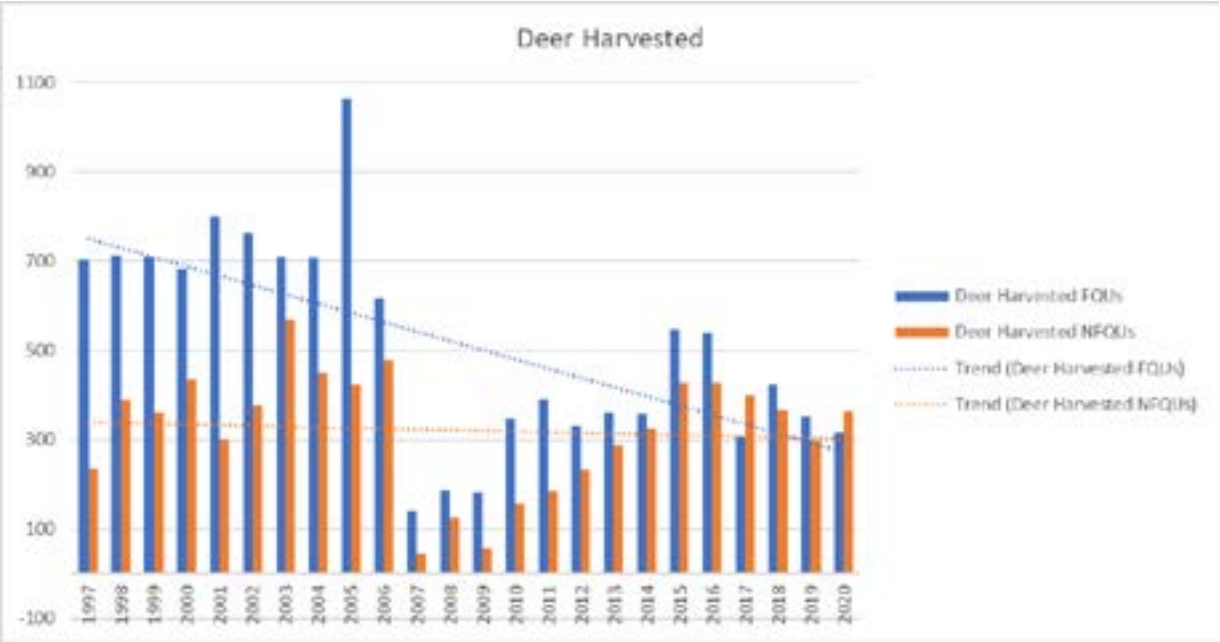

Figure 6. Trends of estimated deer harvest by FQUs and NFQUs, NECCUA, RY97-RY20.

To evaluate potential reasons for the decline in deer harvest by FQUs we examined trends in the numbers of FQU and NFQU hunters and days of hunting effort by those hunters. The number of FQUs hunting in the NECCUA has declined approximately 50% since the late 1990s. Prior to the winter of 2006/2007 an average of 333 FQUs took to the field. The number of FQUs participating in this hunt never fully recovered and since 2013 has only averaged 239 hunters. The number of NFQUs hunting in the NECCUA also declined after the winter of 2006/2007 but returned to pre-2006 levels by 2012 **(Figure 7**).

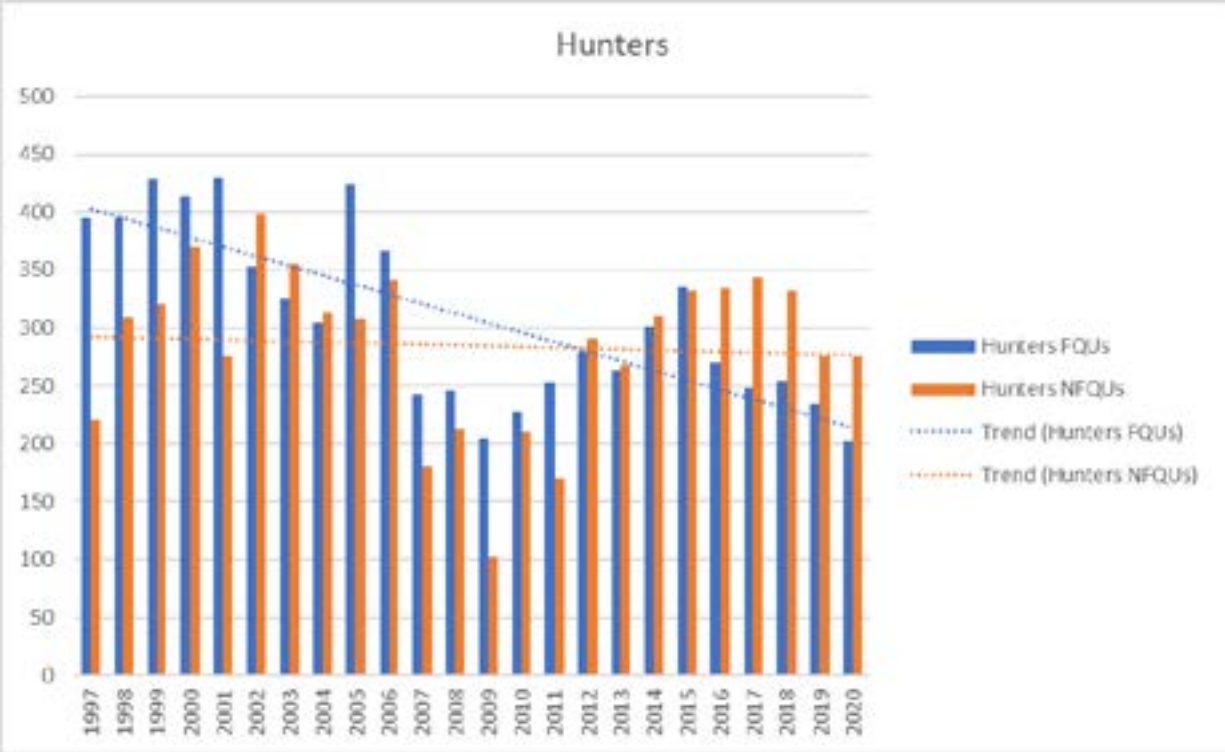

Figure 7. Trends in number of FQUs and NFQUs, NECCUA, RY97-RY20.

In Hoonah specifically, there has been an approximate 10% declining trend in the number of Hoonah residents who have obtained deer harvest tickets (Figure 8).

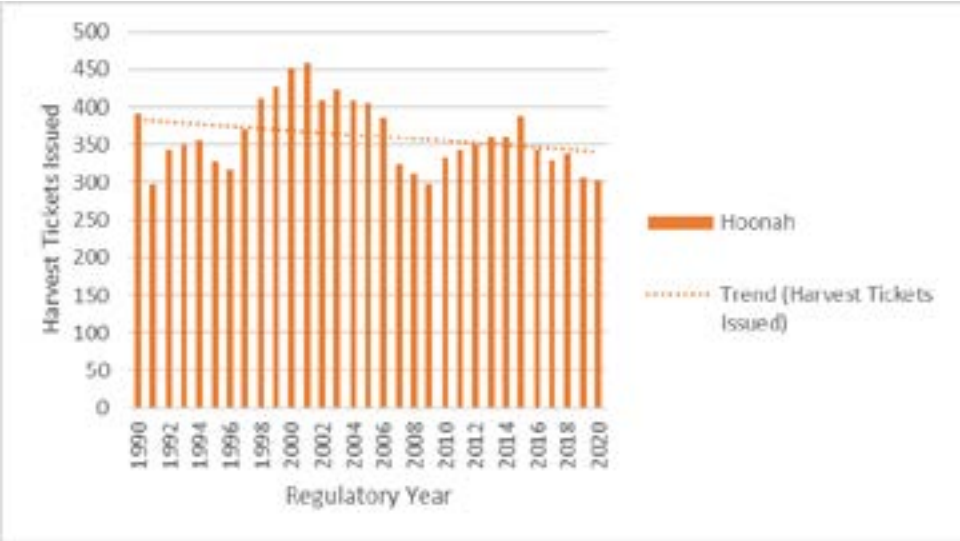

Figure 8. Deer harvest tickets issued to Hoonah residents RY97-RY20.

Trends in days hunted approximate the trends for number of hunters for both user groups. Since 1997 the number of days of hunting effort by FQUs has declined by over 50% while days of hunting effort by NFQUs has remained stable (Figure 9). Similar to the number of hunters, days of hunting effort by FQUs never recovered from the steep decline following the winter of 2006/2007. The number of hunters along

with the number of days hunted both indicate decreased deer hunting effort for this area of GMU 4 by FQU hunters.

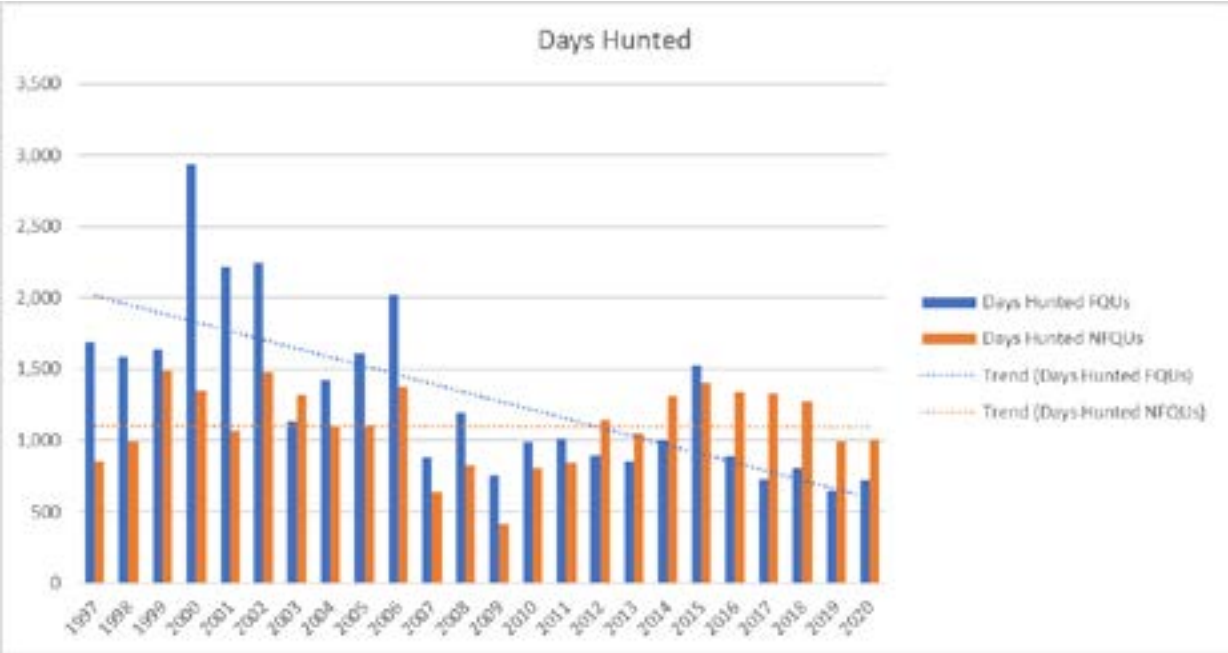

Figure 9. Trends in estimated days of hunting effort by FQUs and NFQUs, NECCUA, RY97-RY20.

Trends in Hunter Efficiency

Hunter efficiency, or the days of hunting effort required to harvest 1 deer, is another indicator of deer availability to GMU 4 hunters. FQUs in the NECCUA are consistently more efficient than NFQUs (Figure 10). Since 2013, NFQUs required an average of 3.4 days to harvest 1 deer, but FQUs required only 2.2 days to harvest one deer. This metric is trending slightly down for FQUs (becoming more efficient) and has been below 2.0 days/deer for 3 of the past 5 seasons.

Compared to deer hunting effort required to harvest a deer elsewhere in the state, this is an extremely efficient hunt. Hunters in GMU 4 require approximately 2.4 days/deer. In comparison, hunters on Prince of Wales Island (GMU 2) average 4.0 days of hunting per deer harvested, Kodiak (GMU 8) averages 3.6 days/deer, GMU 1A (Ketchikan) averages 5.0 days/deer, GMU 3 (Petersburg/Wrangell) averages 6.1 days/deer, GMU 6 (Prince William Sound) averages 3.0 days/deer, and in GMU 1C (Juneau) hunters average 7.9 days/deer (ADF&G 2013-2020). Hunters in GMU 4 experience the most efficient deer hunting of anywhere in Alaska. FQU hunters in the NECCUA have a better days/deer average than Unit 4 as a whole.

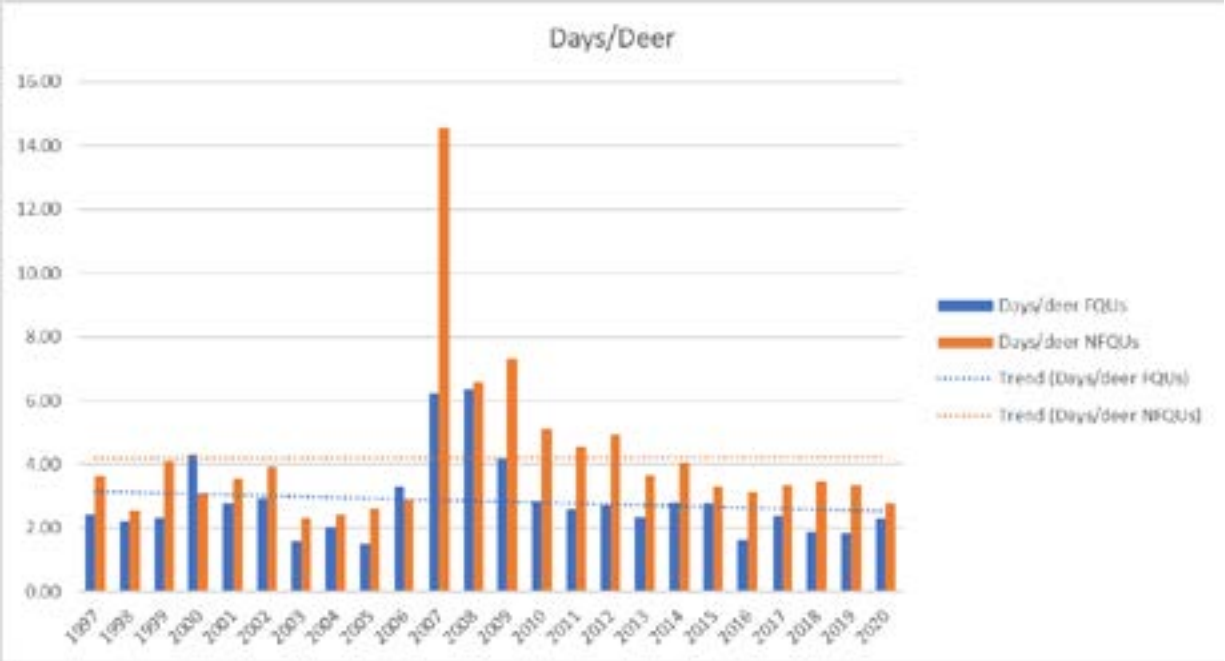

Figure 10. Trends in estimated days of hunting effort by FQUs and NFQUs required to harvest 1 deer, NECCUA, RY97-RY20.

The number of deer harvested per hunter is another gauge of deer abundance and hunting success. Since 1997 the number of deer harvested per NFQU has averaged 1.2. FQUs report harvesting about 1.9 deer/hunter. Prior to the winter of 2006/2007 FQU hunters averaged 2.2 deer/hunter. Since RY13, FQU hunters are only harvesting 1.7 deer/hunter. NFQU deer/hunter numbers have generally returned to pre-RY07 levels. Although the deer/hunter numbers for FQU hunters is trending down, this is more a function of fewer hunters spending less days afield than it is an indicator of hunting efficiency. Particularly in light of days/deer and that NFQU harvests have nearly reached pre-RY07 levels. (**Figure 11**).

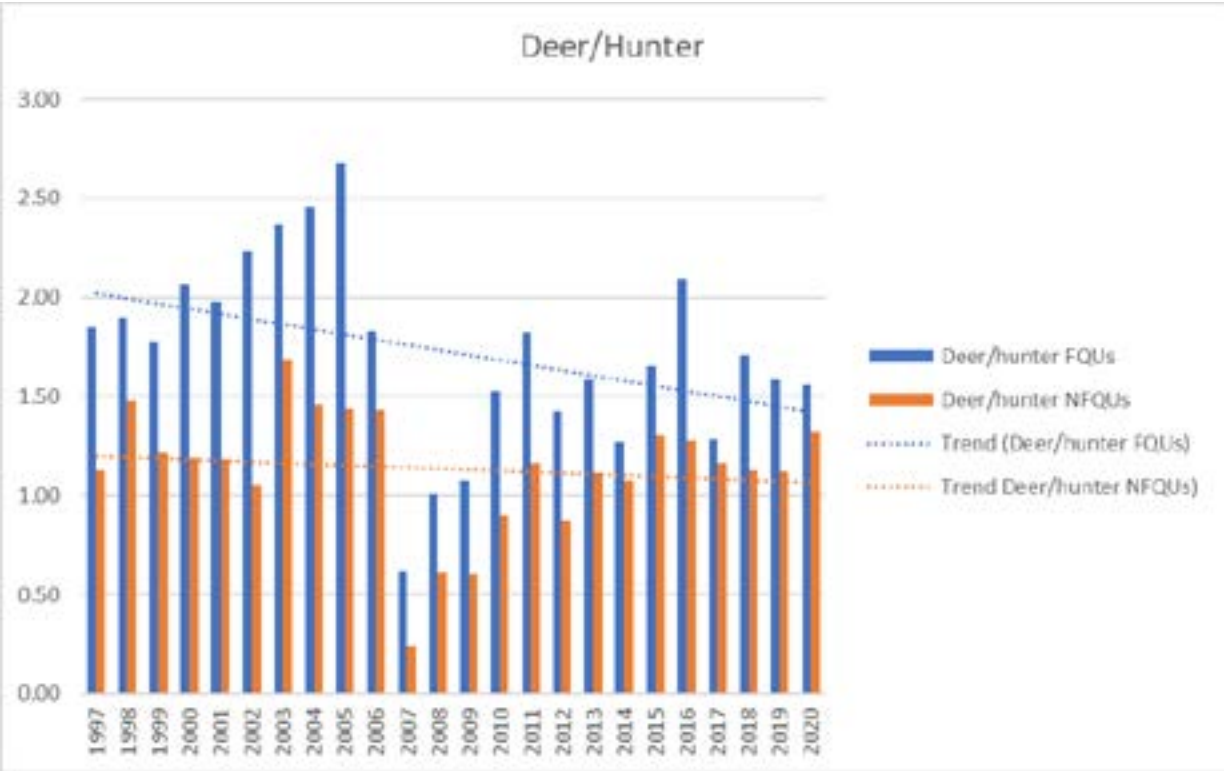

Figure 11. Trends in mean number of deer harvested per FQU and NFQU, NECCUA, RY97-RY20.

Within the NECCUA, the bag limit for NFQUs is 6 deer west of Port Frederick and 3 deer east of Port Frederick. This proposal seeks to reduce that bag limit to 2 bucks for the entire NECCUA. ADF&G collects data on the number of deer individual hunters report taking relative to the bag limit in areas they report hunting. Within GMU 4, 83.5% of NFQUs take 2 or fewer deer (Figure 12, ADF&G RY19-RY20). Eight and a half percent of NFQUs take 3 deer and 5% take 4 deer. The percentage of hunters who took 5 or 6 deer (legal as of RY19) was 1.5% for each.

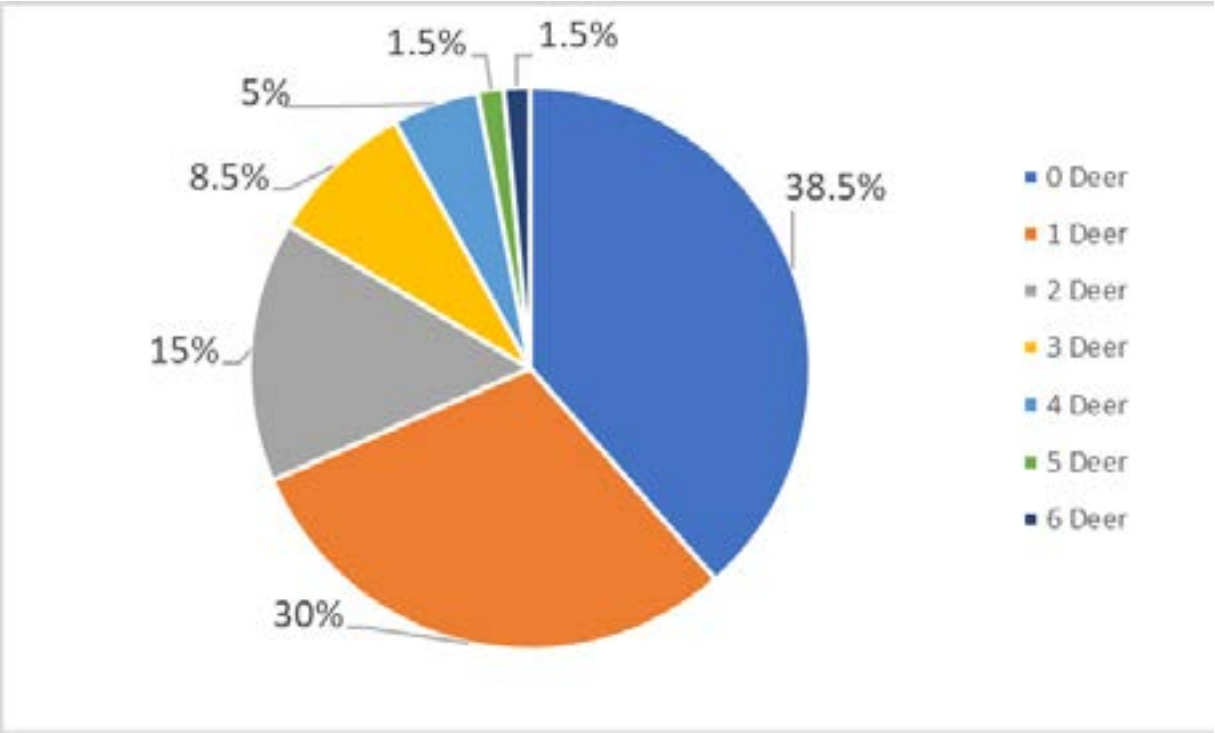

Figure 12. Percentages of NFQUs who report harvesting 0, 1, 2, 3, 4, 5, or 6 deer in , GMU 4, RY19-RY20.

Under federal regulations, FQU hunters were able to harvest six deer prior to RY19 when the State bag limit was raised to six. On average, more FQU hunters take multiple deer than NFQU hunters. For example, 37% of FQU hunters take three or more deer (Figure 13) compared to 16.5% of NFQU hunters.

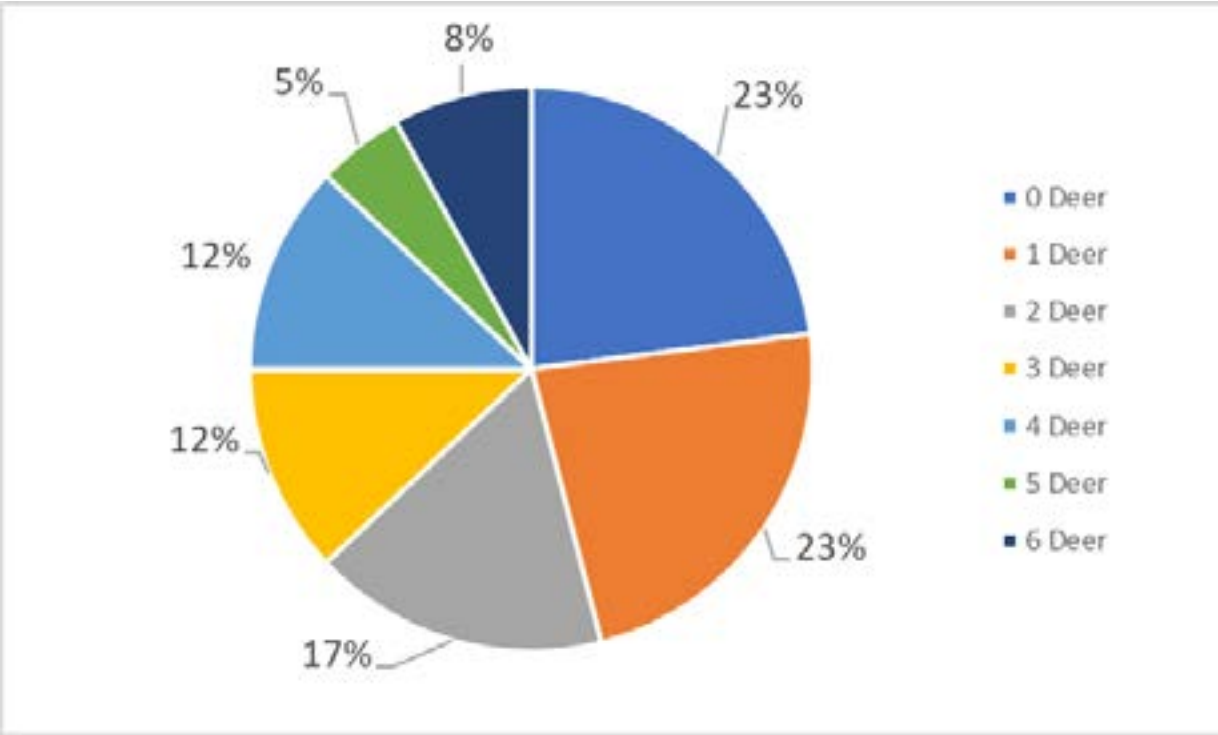

Figure 13. Percentages of FQUs who report harvesting 0, 1, 2, 3, 4, 5 or 6 deer in GMU 4, RY11-RY20.

Doe harvest accounts for approximately 25% of both the FQU and NFQU annual harvest. Since RY13 FQUs have averaged approximately 87 does annually and NFQUs about 93. These calculations do not include RY07-RY12 when doe harvests were restricted to facilitate recovery of the deer herd following the winter of 2006/2007.

Analysis

The analyses presented here are based on several different metrics that come from the only annually collected, objective, and quantitative information available on deer abundance, hunter effort and harvest in the area affected by this proposal. Deer abundance data is not only gathered by ADF&G, but hunters report their effort and harvest to ADF&G, including the local residents of Hoonah.

The proposal asserts that the deer population within the NECCUA is "depleted" and that in recent years FQUs have had difficulty meeting their subsistence needs for deer because of increasing competition from NFQUs. The term, "subsistence need", as used in Title VIII of ANILCA has no quantitative benchmark analogous to ANS in state regulations. ANILCA also does not require the federal program to quantify historical levels of harvest for subsistence uses. Consequently, there is no objective way of verifying whether the existing federal regulations continue to provide for adequate subsistence harvest opportunity. Therefore, our analysis focuses on measures of deer abundance and trend in GMU 4 and on trends in effort and harvest by FQUs and NFQUs in the proposal area. Conditions that would support the assertion that NFQUs are hindering deer harvest by FQUs would include increasing numbers of hunters, days of hunting effort, and harvest by NFQUs that coincide with declining harvest by FQUs while numbers and effort by FQU hunters remained stable or increased.

ADF&G monitors deer abundance at the scale of the GMU or subunit, so we can only note that the available data indicate GMU 4 deer populations are currently at high and stable levels. Winter severity, particularly deep and lingering snowpack, is the biggest limiting factor for Sitka black-tailed deer in GMU 4. The last winter with above average snowfall occurred in 2011/2012. Since then, winters have been average to mild with little overwinter mortality. Pellet group and aerial alpine deer counts also support the conclusion that deer remain abundant in GMU 4.

The proposal is predicated on the idea that FQUs in the NECCUA area are having an increasingly difficult time meeting their subsistence needs. Because no similar proposal has been submitted before, we can presume that previously FQUs were able to meet their needs. Therefore, to evaluate the need for this restriction of NFQUs opportunity we evaluated harvest and measures of hunter effort for trends of increasing effort and harvest by NFQUs.

We found that harvest by FQUs and NFQUs declined in response to the severe winter of 2006/2007. Since then, harvest by NFQUs has recovered to pre-2007 levels, but harvest by FQUs remains much lower than before RY07. To investigate reasons for declining harvest after the deer population recovered, we examined numbers of FQUs and NFQUs participating in this hunt and days of hunting effort by both groups of hunters. We found that since RY07 the number of individual FQUs within the NECCUA has declined by 50%, whereas the number of NFQUs has returned to pre-2007 levels. Days of hunting effort by FQUs showed a similar trend while days of hunting effort by NFQUs returned to pre-2007 levels. This finding directly contradicts the assertion in the proposal that increasing competition from NFQUs is hindering harvest by FQUs. In fact, total deer hunting effort and the potential for competition between hunters in this area has substantially declined.

To evaluate whether FQUs are having an increasingly difficult time harvesting deer we looked for trends in the number of days of hunting effort required to harvest one deer and number of deer harvested per hunter. Since RY13, FQUs require 2.2 days of hunting effort per deer compared to 3.5 days of effort for NFQUs. Since RY13 days of hunting effort required to harvest a deer has been trending down for FQUs and has been below 2.0 days/deer for 3 of the past 5 seasons.

If harvesting deer was becoming more difficult for FQUs, we would expect to see an increase in the number of days of hunting effort required to harvest a deer and a decline in the number of deer harvested per FQU hunter. While there has been a decline in the number of deer/hunter (2.2 to 1.7 between RY97-RY06 and RY13-RY20), there hasn't been a corresponding increase in days/deer. These measures of hunter success based on hunt reports provided by FQUs, including residents of Hoonah, indicate that deer hunting conditions in the NECCUA remain very good and that in recent years FQUs have enjoyed very good hunting success.

Potential effects of the proposed change on the deer population or FQU harvest are difficult to project. NFQ hunters take on average 93 does annually in the NECCUA. By applying the percentage of NFQUs who take 0, 1, 2, 3, 4, 5 or 6 (only hunters west of Port Frederick can harvest more than three) deer to previous harvests by NFQUs in the NECCUA, the average annual reduction in harvest would be approximately 25 deer west of Port Frederick and 40 deer East of Port Frederick. But, those calculations do not take into account deer harvested below mean high tide and on other State and private lands, or whether hunters would harvest additional bucks if does were not legal. Because NFQUs take an average of only 1.2 deer per hunter, and harvest 75% bucks, the proposed regulatory change is unlikely to affect the deer population or result in any substantial increases in opportunity for FQUs.

Summary

The proposal asserts that the deer population within the NECCUA is depleted and that in recent years FQUs have had difficulty meeting their subsistence needs because of increasing competition from NFQUs. Our analysis of the deer population, hunter effort and harvest trends found no support for either contention. Instead, the available information indicates that deer remain abundant throughout GMU 4. Within the NECCUA it is unlikely that hunter harvest has reduced deer abundance because total hunting effort is relatively light, and over the last 2 decades total hunter effort and harvest have both declined.

We could find no support for the contention that competition from NFQUs has increased or that NFQUs are hindering harvest by FQUs. In fact, the number of NFQUs and days of hunting effort by NFQUs has remained stable over the past 2 decades. Further, days of hunting effort required to harvest one deer remains very low.

Our analysis does indicate a long-term decline in the number of deer harvested by FQUs within the NECCUA. However, that decline is attributable to a decline in the number of FQUs and days of effort by those hunters. Over the last 20 years the number of FQUs and days of hunting effort by those hunters has declined by more than half. Deer remain abundant and competition from NFQUs is unchanged, so we conclude that the decline in federal subsistence harvest of deer results from a decline in participation and effort by FQUs, not depleted deer populations or increasing competition from NFQUs.

Impact on Subsistence Users

The reduction in the bag limit of NFQUs would not have any impact on FQUs given the data showing how many deer NFQUs typically harvest.

Impact on Other Users

Opportunity for NFQUs to harvest deer on federal public lands in the NECCUA would be reduced. Bag limits west of Port Frederick would decline from 6 deer per hunter to 2 bucks. East of Port Frederick the NFQU bag limit would be reduced from 3 deer to 2 bucks.

Opportunity Provided by the State

The State season and bag limit for the NECCUA in GMU 4 is:

GMU 4 NECCUA East of Port Frederick		
Bag Limit 3 deer (bucks only to Sep 14th)	**Resident Open Season Aug1-Dec 31** **(Harvest ticket)**	**Resident Open Season Aug1-Dec 31** **(Harvest ticket)**

GMU 4Remainder		
Bag Limit 6 deer (bucks only to Sep 14th)	**Resident Open Season Aug1-Dec 31** **(Harvest ticket)**	**Resident Open Season Aug1-Dec 31** **(Harvest ticket)**

Conservation Issues

There are conservation issues for the deer population in GMU 4. Following 9 consecutive mild winters, the available population indices suggest the GMU 4 deer population remains high and stable. 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 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.

Enforcement Issues

Passage of this proposal will create increasingly complex regulations for NFQUs. Enforcement will be challenging because NFQU's will remain eligible to hunt deer (including does) on state-owned tidelands below the line of mean high tide and private property. The tideline is not marked, so NFQUs and enforcement officers will have difficulty determining when deer are above or below that line of mean high tide.

Position

ADF&G OPPOSES this proposal because there is no evidence that hunting by NFQUs has affected FQUs ability to harvest deer. There is no conservation concern and therefore no biological justification for reducing the bag limit of NFQUs. Adopting this proposal would deprive NFQUs of sustainable deer hunting opportunity contrary to terms in Title VIII of ANILCA.

Approximately 90% of land in GMU 4 is federally managed, and current federal regulations provide greater opportunity for FQUs compared to NFQUs. FQUs are eligible to hunt an entire month longer than NFQUs with a season extending through January. In the NECCUA, east of Port Frederick (where 70% and 80% of FQU and NFQU harvest occurs, respectively), FQUs have a much more liberal bag limit (6 deer compared to 3 deer for NFQUs) as well as a very liberal designated hunter program.

In Alaska v. Federal Subsistence Bd., 544 F.3d 1089, 1100 (9th Cir. 2008), the Ninth Circuit ruled that, under ANILCA, the Federal Subsistence Board may regulate subsistence use but is prohibited from limiting nonsubsistence use. A bag limit reduction for NFQUs for deer in GMU 4 is inconsistent with ANILCA under applicable case law on federal preemption. As directed by Congress in Section 802 of ANILCA, subsistence uses of wildlife shall be the priority consumptive use on federal public lands "when it is necessary to restrict taking in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such population." Section 815 of ANILCA authorizes federal restrictions on nonsubsistence uses on the public lands only if "necessary for the conservation of healthy populations of fish and wildlife" or if necessary to "continue subsistence uses." Based on ADF&G's analysis of the only annually collected, objective, and quantitative data available, neither of those reasons apply. There is no conservation concern for the NECCUA deer population, and no restrictions on NFQU bag limit are needed to continue subsistence uses of deer. Data largely provided by FQUs residing in the NECCUA clearly indicate that the decline in harvest by that user group resulted from substantially lower participation and effort by FQU deer hunters.

Data Tables

Table 1. Number of GMU 4 NFQUs that harvest 0, 1, 2, 3, 4, 5, or 6 deer.

Reg Year	Total Hunters	Zero Deer	One Deer	Two Deer	Three Deer	Four Deer	Five Deer	Six Deer
2011	1533	433	419	296	218	166	0	0
2012	1546	637	446	250	119	94	0	0
2013	1660	579	520	286	170	100	1	0
2014	1808	762	534	287	148	78	0	0
2015	1875	588	559	340	232	155	0	2
2016	1872	596	589	325	220	141	0	0
2017	1783	663	558	303	168	90	0	1
2018	1779	645	550	327	173	83	0	0
2019	1750	664	569	274	124	76	26	18
2020	1793	697	504	253	171	108	29	30
Average	1740	626	525	294	174	109	28	24

Table 2. Number of GMU 4 FQUs who harvest 0,1,2,3,4,5, or 6 deer.

Reg Year	Total Hunters	Zero Deer	One Deer	Two Deer	Three Deer	Four Deer	Five Deer	Six Deer
2011	1644	246	304	282	200	247	115	251
2012	1578	424	328	256	234	155	73	108
2013	1644	408	402	291	174	184	91	95
2014	1662	536	375	280	178	157	66	71
2015	1903	412	472	328	235	243	104	108
2016	1883	340	386	281	235	322	123	196
2017	1717	462	400	305	217	175	76	83
2018	1684	414	441	302	215	144	80	88
2019	1646	277	404	278	198	201	121	167
2020	1464	402	339	251	186	138	64	86
Average	1683	392	385	285	204	207	91	125

Table 3. Summary Table Federally Qualified Deer Hunters WAAs 3523-3526, 3551, 4222, 4252 and 4253.

Regulatory Year	No. of Hunters	Total Hunt Days	Bucks Harvested	Does Harvested	Total Harvest	Deer per Hunter	Days per Deer
1997	345	1692	545	159	704	2.04	2.40
1998	347	1586	545	168	713	2.05	2.22
1999	391	1640	482	228	711	1.82	2.31
2000	334	2933	517	164	682	2.04	4.30
2001	378	2215	531	270	800	2.12	2.77
2002	325	2246	710	53	763	2.35	2.94
2003	276	1134	528	183	711	2.58	1.59

Regulatory Year	No. of Hunters	Total Hunt Days	Bucks Harvested	Does Harvested	Total Harvest	Deer per Hunter	Days per Deer
2004	261	1429	513	194	708	2.71	2.02
2005	358	1609	707	357	1064	2.97	1.51
2006	319	2026	466	150	616	1.93	3.29
2007	230	879	115	25	141	0.61	6.23
2008	192	1190	177	10	187	0.97	6.36
2009	161	759	182	0	1825	1.13	4.17
2010	192	989	283	32	348	1.81	2.84
2011	196	1010	378	12	390	1.99	2.59
2012	220	894	296	33	331	1.50	2.70
2013	213	853	267	94	361	1.69	2.36
2014	260	1004	275	83	358	1.38	2.80
2015	314	1527	435	113	548	1.75	2.79
2016	246	889	462	77	540	2.20	1.65
2017	223	726	235	71	306	1.37	2.37
2018	238	803	324	98	422	1.77	1.90
2019	214	643	283	70	353	1.65	1.82
2020	203	719	229	88	316	1.56	2.28

Table 4. Summary Table NFQU Deer Hunters WAAs 3523-3526, 3551, 4222, 4252 and 4253.

Regulatory Year	No. of Hunters	Total Hunt Days	Bucks Harvested	Does Harvested	Total Harvest	Deer per Hunter	Days per Deer
1997	206	850	200	34	234	1.14	3.63
1998	290	993	275	113	388	1.34	2.56
1999	311	1482	226	136	362	1.16	4.09
2000	360	1345	363	72	435	1.21	3.09
2001	244	1067	219	82	301	1.23	3.54
2002	383	1475	302	77	378	0.99	3.90
2003	331	1318	435	135	570	1.72	2.31
2004	303	1095	333	118	451	1.49	2.43
2005	293	1106	308	115	424	1.45	2.61
2006	326	1372	386	93	479	1.47	2.86
2007	155	641	39	5	44	0.28	14.57
2008	202	823	125	0	125	0.62	6.58
2009	92	416	57	0	57	0.62	7.30
2010	188	805	157	0	157	0.84	5.13
2011	157	843	172	11	184	1.17	4.58
2012	262	1142	217	14	232	0.89	4.92
2013	249	1048	212	76	287	1.15	3.65
2014	293	1310	248	78	325	1.11	4.03

Regulatory Year	No. of Hunters	Total Hunt Days	Bucks Harvested	Does Harvested	Total Harvest	Deer per Hunter	Days per Deer
2015	320	1405	313	114	427	1.33	3.29
2016	331	1339	327	100	427	1.29	3.14
2017	337	1334	274	127	400	1.19	3.34
2018	323	1270	305	62	366	1.13	3.47
2019	269	995	231	68	299	1.11	3.33
2020	275	1005	243	121	364	1.32	2.76

WRITTEN PUBLIC COMMENTS

[EXTERNAL] Alaska Outdoor Council comments - 2022-2024 Wildlife Proposals

Rod Arno <rodarno@gmail.com>
Mon 7/19/2021 12:23 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Cc: Mulligan, Benjamin J (DFG) <ben.mulligan@alaska.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Alaska Outdoor Council
310 K Street, Suite 200
Anchorage, Alaska 99501
July 19, 2021

RE: Public comments for FSB 2022-2024 Wildlife Proposals

The Alaska Outdoor Council (AOC) is a Statewide coalition of individual members and clubs representing 10,000 Alaskans who hunt, trap, fish and recreate on public lands/waters in Alaska. AOC Club Representative have participated in the regulatory process of managing and allocating fish and game in Alaska since before statehood in 1959.

Numerous proposals submitted by Federal Subsistence Regional Advisory Councils, federally recognized subsistence communities, and individuals confirm the fears that many AOC Representatives had at the time of the passage of Alaska National Interest Lands Conservation Act (ANILCA) 1980. Dual management of who can harvest game depending on whether you are on state public and private lands or if you are on federal lands was not the intend of Congress when they passed ANILCA.

AOC opposes WP22-07, WP22-08, WP22-09.
Alaska Department of Fish & Game data should not invoke a complete closure to non-Federally Qualified Subsistence Users under Section 804 of ANILCA. Even the 9th Circuit Court, *Ninilchik Traditional Council v. U.S.*, 227 F.3d 1186 in 2000 understood the priority given in Title VIII of ANILCA was not absolute.

AOC opposes WP22-15.
Congress's findings and declaration in Sec. 801 of ANILCA should leave no room for regulatory action by the Federal Subsistence Board (FSB) regarding anti-trapper claims. Sec. 801(3) of ANILCA should have the FSB concentrating only on "remote federal lands", as was the intent of Congress when they passed 802(2) of ANILCA.

AOC opposes WP22-16 thru 22.
Providing a priority for some individuals or communities to harvest game on federal public lands located on the Kenai Peninsula only exacerbates the conflict between federally qualified hunters and Alaskans living in non-federally qualified areas of the state. Both groups of hunters are similarly situated.

AOC opposes WP22-32.
It would be in Alaskan's best interest if the FSB would reduce the number of Alaskans allowed a priority to harvest game on federal lands just based solely on where they live, not how.

Thanks for the opportunity to provide public comments.

Rod Arno, Public Policy Director
Alaska Outdoor Council

Sent from Rod Arno's iPad.

To Whom It May Concern,

I am writing today thankful for the opportunity to voice my opinion regarding the following proposals.

WP22-07 - To exclude hunting privileges in this region to Juneau residents who depend solely on deer meat to survive is simply outrageous. Angoon hunters DO NOT hunt anywhere remotely close to Hawk Inlet and have the benefit of hunting more productive and safer waterways near town. (Mitchell Bay) Where Juneau residents even on a good weather day cannot reach. It will confine hunting areas to Juneau residents which will increase pressure on already overcrowded areas furthermore helping to create unsafe scenarios. It is discriminatory, unethical, and does not show good land management for the "American people" rather it divides and polarizes Alaskans in the region.

WP22-08 – I hope this is not a biased proposal toward Juneau hunters and is actually based on science relating to current deer populations. How did we go from 6 to 2? Snow and ice lead to winter die off which effects overall deer populations not hunters.

WP22-09 - Rural hunters outside of Juneau already have the benefit of a longer harvest period. Just because our jobs and lives are based in Juneau does not mean we want the high cost of inferior meat from Costco.

In closing please do not take away these beautiful places to Juneau residents limiting our access to the outdoors, feeding our families, and the social benefits hunting brings us.

Thank you

Adam S. Anderson

Mike Bethers
P.O. Box 210003
Auke Bay, AK 99821
(907)-321-1186
mikebethers@gmail.com

June 22, 2021

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

Re: Wildlife Proposals 22-07, 22-08, and 22-09

Dear Mr. Matuskowitz:

Please include these comments in the public record. Please give a copy to each board member.

Subsistence deer hunters (Federally Qualified Users or FQUs) from Angoon, Hoonah and Pelican are claiming that non-subsistence deer hunters (Non-Federally Qualified Users or NFQUs) are out competing them for blacktail deer. Village residents are federally qualified and already have priority use of the deer resource as their season runs through January 31, while the NFQU season ends December 31.

The Southeast Alaska Subsistence Regional Advisory Council has developed three wildlife proposals – 22-07 Angoon, 22-08 Hoonah, and 22-09 Pelican – to address claims that NFQUs are responsible for reduced subsistence harvests in these villages. These proposals are based only on comments from villagers and are not based on any actual data or documented observations.

Based on my personal observations made deer hunting in Northern Southeast Alaska over the last fifty years and findings of the Alaska Department of Fish and Game (ADF&G) harvest studies, these proposals can not be justified in any way and should not be adopted.

I have been a lifelong deer hunter and am over seventy years old. The last several years I've spent more than fifty days in the woods annually, and for the last fifty years, my hunting has been in Northern Southeast Alaska; I've hunted in all areas included in these proposals. I can still get up the mountain farther than I can get a big buck out of the woods and am very selective of what I harvest and where. I use a boat to access my hunting areas and do a lot of calling and don't hunt from drivable roads. I haven't been on the Hoonah road system in decades. Every year I let many deer walk away rather than shoot them and have absolutely no problem getting enough deer to meet my family's needs.

Theo Matuskowitz
June 22, 2021
Page 2
Following are comments that apply to all three proposals (22-07, 22-08, and 22-09)

FQUs already have priority to deer as they can hunt through January when deer are often most available while NFQU's season ends December 31.

The winter of 2007-2008 saw a record high snowfall throughout Northern Southeast Alaska and as a consequence, deer where driven to the beach in numbers not seen since. They were at the peak of availability. Since the winter of 2007-2008 there has been less snowfall and deer have not hit the beach in numbers seen during the 2007-2008 winter. In the last three to four years there has been less snow and more rain. Deer have not herded up on the beach much and it has been more miserable to hunt in the rain but hunters I associate with, that like to hunt and eat venison, were out there hunting.

In the areas I've hunted the last ten years, I have seen fewer hunters than in earlier years.

Since the deer killing winter of 2007-2008, the deer populations in all three areas have rebounded and currently are at or near all time highs.

Comments on 22-07 Admiralty

This proposal would essentially close federal lands from Pt. Marsden to Pt. Gardener to deer hunting by NFQUs from September 15 through November 30.

Most NFQUs from Juneau who hunt the West side of Admiralty usually turn around at Funter Bay or Hawk Inlet as there are few to no good anchorages south of Pt. Marsden. Also, the proposed closed area is too far from Juneau for day trips. It is my belief that most subsistence hunting from Angoon is done on the beaches, which are not included in this proposal as beaches are state land.

I know several NFQU hunting parties that hunt West Admiralty, mostly north of Pt. Marsden, and they are typically quite successful. I know of two parties of NFQUs that hunt out of Angoon and they always get their deer.

Comments on 22-08 Hoonah

Hoonah has really degraded local wildlife habitat through extensive clear-cut logging (which has been shown to significantly impact wildlife values over the long period) and the extensive road system (which has been shown to also reduce the area's wildlife values). The Hoonah road system has become a favorite place to conduct hunting by Hoonah residents, especially after doe season opens. Please note that reduced sailing schedules of the Alaska Marine Highway's ferries have reduced opportunity for NFQUs from Juneau to get to Hoonah to compete with local hunters.

Over the years, deer have adjusted to the heavy hunting pressure along the Hoonah road system. After a week or two of harassment by road hunters, surviving animals move away from the roadside. However, I know those that hunt in the woods accessed by the Hoonah road system have had no problem finding deer.

Theo Matuskowitz
June 22, 2021
Page 3

I have heard of two Hoonah residents who in the past typically shot many more deer than the limit, which would take deer away from other hunters.

Also please note that data shows there is minimal exchange of deer between the north shore of Tenakee Inlet and areas accessed by the Hoonah road system. The mountains on the north side of Tenakee Inlet serve as a dividing line for Tenakee Inlet deer and deer living north of the mountains in areas accessed by the Hoonah road system. Therefore, only areas accessed by the Hoonah road system on northeast Chichagof Island should be included in proposal 22-08 and the north shore of Tenakee Inlet should be excluded.

ADF&G deer harvest and hunter effort data applies to all three proposals.

1. Deer populations are at very high levels.
2. There have been substantial decreases in hunting effort by FQUs
3. There has not been any noticeable increase in hunting effort by NFQUs
4. The reduced number of FQUs still hunting are harvesting more deer than in the past.
5. There is simply no justification to support any of the three proposals.

In conclusion

There are very high numbers of deer available in all areas covered by these proposals, however, FQU hunters are no longer hunting. They are not taking advantage of the standard deer season (August 1 – December 31) or their priority opportunity of hunting through January. Deer are often most available during January, due to winter snow levels, etc.

Any restriction of NFQU deer hunting opportunity will not increase subsistence harvests in the villages. FQUs from the villages need to get out of the house and out of their vehicles and back into the woods to get their deer. They will have no problem.

Proposals 22-07, 22-08, and 22-09 are based on inaccurate beliefs of FQUs in the villages and lack any justification. Adoption of any of these proposals would be a needless and huge disservice to many hunters in northern southeast Alaska, hunting a strong public resource, on public lands.

Please reject (not approve) proposals 22-07, 22-08, and 22-09.

Thank you for the opportunity to comment.

Sincerely,

Mike Bethers
Auke Bay, Alaska

Mike Bovitz

9500 N Douglas Hwy

Juneau, AK 99801

(907)723-2279

Metalworks@gci.net

Theo Matuskowitz

Federal Subsistence Board

Office of Subsistence Management

1011 East Tudor Road , MS-121

Anchorage, Ak 99503-6199

Re: wildlife proposals 22-07, 22-08, and 22-09

Hello Mr. Matuskowitz:

I am NOT in support of the 3 wildlife proposals-22-07 Angoon, 22-08 Hoonah, and 22-09 Pelican.

The rural subsistence deer hunters/Federally qualified users are claiming it is getting harder to fill their quota of deer. They are concerned about the potential of not enough deer for their personal use to live a subsistence living. There is no science based facts to what is being questioned or science based facts to what they are stating on the deer population.

Alaska fish and game do harvest studies, pellet counts, flights for deer etc, etc. This is all paid for by every Alaskan through tax dollars. Based on their science the number of deer is quite plentiful and Federally Qualified Users already have an extended season going through January 31st. Alaska fish and game last year allowed every resident 6 deer instead of the normal 4. Why would they do that if there was a resource problem?

The only thing that has changed over the past years is our weather pattern. Snow is no longer coming in and staying on the beach for long periods of time driving the deer to the beach. Which is a good thing because as those big snow falls happen mother nature NOT man takes over and the deer start to die .

Proposals 22-07, 22-08, and 22-09 are not science based, have no justification, and would be the wrong thing to do to many Southeast Alaska hunters, hunting a public resource.

Please REJECT and NOT APPROVE proposal 22-07, 22-08, 22-09

Thank you for your time,

Mike Bovitz

[EXTERNAL] SE Deer Hunting

Lee Bridgman <Lee.aklife@outlook.com>
Fri 7/9/2021 1:53 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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RE: proposed changes to deer hunting in Unit 4 are WP22-07, WP22-08, WP22-09, and WP22-10.

I myself do not hunt in the Southeast and do not believe the large numbers are making their way to hunt deer in this area. The cost of getting there compared to the game meat taken would make the trip counter productive. As for the Wanton Waste of game meat, I would believe that F&G would be very able to check vessels arriving in Juneau for proper care of the game meat.

The proposals will only further divide the user groups, which is not a desired result. If limits need to be reduced, for all, then so be it.

Do not proceed with these proposals.

Thank you,

Lee H. Bridgman
763 Wanda Dr
North Pole, AK 99705

[EXTERNAL] Public comment: Wildlife proposals 22-07, 08, 09

Kelly Cates <kacates@alaska.edu>
Mon 7/19/2021 9:31 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Dear Subsistence Management Board,

I am writing in opposition to wildlife proposals 22-07, 22-08 and 22-09. I am a SE hunter and my family regularly hunts in each of the proposed areas. We rely on subsistence meats to feed us through the year and enjoy the memories created from our hunting trips. It is unclear to me why these proposals were initiated as the data outlined in the packets suggests that deer populations are thriving and that FQU's are harvesting more deer than they used to. So if there are plenty of deer and enough for all users, why should one user group be excluded? Again, I oppose these proposals and hope the facts outlined in the information packets are fairly weighed in the boards decision.

Thanks,
Kelly Cates

--

Kelly Cates, PhD Candidate
College of Fisheries and Ocean Sciences
Juneau Fisheries Division, University of Alaska Fairbanks
kacates@alaska.edu | (360) 420-5032

'May your trails be crooked, winding, lonesome, dangerous, leading to the most amazing view'

[EXTERNAL] Comments for WP22-07,8,9,10

Matthew Catterson <mattcatterson@yahoo.com>

Fri 7/16/2021 4:30 PM

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

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Federal Subsistence Board Members,

I am writing to comment in respectful opposition to the regulatory actions proposed in WP22-07, WP22-08, WP22-09, WP22-10. I am currently a resident of Juneau, but I have spent most of the past 15 years residing in the Southeast Alaska communities of Yakutat and Sitka. My time living, working, fishing, and hunting in these communities has engendered in me a great respect and connection to the subsistence lifestyle.

Because of my background, I can certainly empathize with the concerns presented by the authors of these proposals. However, the information provided in ADF&G Department comments is aligned with my experiences hunting in the proposal areas, which is that hunting effort in these areas is minimal and that competition between hunters is not responsible for trends of reduced deer harvest by FQUs or NFQUs. I believe it is widely accepted that environmental conditions (harsh winters), not hunting pressure, is the primary driver of deer abundance in Northern Southeast Alaska.

I would ask Federal Subsistence Board members to very carefully consider these proposals that significantly reduce available hunting areas to residents of Juneau. As you know, just because someone lives in a larger community like Juneau, does not mean they don't live a subsistence lifestyle and place great cultural, traditional, and personal value on a connection to the natural world that is based on procuring food for themselves, their family, and their community. The closures and bag limits reductions in these proposals would significantly impact traditional hunting use patterns for many people who live in Juneau and should only be enacted in extremely dire circumstances.

As an alternative, I would not oppose regulatory changes that increase opportunity for FQU's while maintaining existing hunting opportunity for NFQUs. This type of regulatory change, coupled with ADF&G assertions that deer abundance is relatively stable in proposal areas, may achieve the increased harvest sought by proposal authors.

Thank you for your time and consideration of my comments.

Matt Catterson, Douglas, Alaska

[EXTERNAL] Unit 4 WP22-07, WP22-08, WP22-09, WP22-10 Proposed closure of Blacktail deer seasons to non-subsistence hunters

Ken Couch <kc_n_gurls@yahoo.com>

Mon 7/19/2021 5:35 AM

To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>; AK Subsistence, FW7 <subsistence@fws.gov>
Cc: AK Subsistence, FW7 <subsistence@fws.gov>

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I am opposed to these proposals because there is no scientific evidence or biological data to support these recommendations. ADFG biologists are on record stating the proposed closures will unnecessarily restrict non-subsistence hunters of opportunity to hunt contrary to Title VIII of ANILCA. There is no biological evidence or even a reason to believe that non-subsistence hunters are affecting the federally-qualified subsistence hunters ability to harvest deer.

I am getting tired of RACs, aided and abetted by the Subsistence Office of FWS Region7 continuing to waste public funds on these frivolous proposals to give federally-qualified subsistence hunters a private hunting club paid for by all Federal tax payers. Federal Regulations REQUIRE that the proponent of any rule change has the burden of proof to show the proposed change is necessary. The RAC has not provided any proof. Instead, all this is just wasting tax dollars. Maybe all the non-subsistence hunters should start making frivolous proposals that the RAC has to fight. Then maybe they would not have time to waste time and tax dollars on unsubstantiated claims.

Ken Couch

Sent from my iPhone

[EXTERNAL] Proposals 22-07/08/09

Elias Daugherty <elias1547@yahoo.com>
Mon 7/12/2021 4:39 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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I Elias Daugherty
Oppose the proposal 22- 07/08/09
The deer numbers show healthy and Sustainable.

I do think that nNon-residents becoming residents should have a stricter and longer qualification period
For hunting
Privileges
Such as a 5 year stay required.

I also believe if there is a concern about deer numbers being taken that the price for non-resident dear tags should increase. And Stricter non-guided deer hunts.

Sent from my iPhone

[EXTERNAL] WP22-08

sam davis <ffdavis769@gmail.com>

Sat 6/19/2021 11:22 AM

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

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I have an alternative to this proposal that would be a win win for everyone involved. Rather than limiting deer harvest limit to non subsistence hunters who still rely on that meat for filling freezers, why not increase predator control in the northeast chichagoff control use area. Hoonah has always had a history of brown bear problems in town. The first option would be to allow a brown bear every regulatory year. The second option would be allow land motor vehicles to be used in the taking of brown bear. Lower the number of bears in the area and raise the fawn survival rate. I hope you take this into consideration. Thank you for your time.

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

John Demuth <jdemuth@pndengineers.com>

Wed 6/30/2021 5:46 PM

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

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Attention: Theo Matuskowitz

The intent of this email is to voice my opposition to the following proposals:

- WP22-07
- WP22-08
- WP22-09

The population of deer in these areas (as all areas in SE Alaska and Kodiak) has historically been impacted primarily by weather, and in particular the amount of snow experience in a given winter/early spring – NOT by the small percentage of hunters who may choose to venture further away from towns/areas with greater hunting pressure – i.e. Juneau. When heavy snow kills off deer, EVERYONE feels the impacts due to reduced numbers of deer.

W22-07 in particular is extremely exclusive and excessive as it covers over 70 miles of the west side of Admiralty Island – 40 miles north and 30 miles south. This is simple outrageous. NOBODY in Angoon hunts 30-40 miles from town, but rather they hunt primarily in Mitchell Bay due to the close proximity and favorable weather conditions – i.e. protected from high wind/waves. In addition, the vast majority of hunting pressure on the south end of Admiralty is from Petersburg and Kake hunters – who also qualify as subsistence hunters and hence will continue to compete with Angoon hunters – effectively changing nothing. The proposal clearly is intended to exclude Juneau hunters from hunting on the west side of Admiralty Island and will hence increase hunting pressure on the east side of Admiralty. The intent seems reasonable, but the range/area is far too large and should be reconsidered to be more focused on the immediate area around Angoon.

Thank you for your consideration.

- John DeMuth

[EXTERNAL] Public Comments Regarding Subsistence Management Program 2022-2024

Jared Erickson <erickson_jared@yahoo.com>
Sat 7/17/2021 7:43 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Public Comments Regarding Federal Subsistence Management Program 2022-2024:
WP22-07
WP22-08
WP22-09
WP22-10

Federal Subsistence Board-
I would like to take this opportunity to voice my opposition to the proposed changes to the above referenced deer hunting regulations in SE Alaska. To manage a population of a targeted animal species for harvest, I do believe it would be a mistake to consider anything other than the health of the population of that species. The ADF&G recently produced a comment response to the above proposed changes and the general trends show that there are fewer FQU's hunting, and they are hunting fewer days per year. The data also strongly suggested that the the Sitka Black Tail Deer populations in the areas referenced above are absolutely healthy and stable. That is, it has been a renewable source of food for all user groups for many years. The above proposals also do not take into account that deer at, or below, the mean high tide mark would still be eligible for harvest by the NFQU user group. I believe that this would actually make the concern worse due to the fact that all hunting efforts in these areas by NFQU's would be focused on the easier deer to harvest. If a NFQU is not allowed to harvest deer at elevation, or via flying into a lake that drains into these areas, the focus will shift to the deer near below the mean high tide level. This would generate the exact opposite effect as what is desired. I also believe it would be very hard to enforce the new proposals. The most concerning example I can think of is what will happen if a deer is shot below mean high tide, but then expires and is recovered above the mean high tide? A difficult scenario and one that invites controversy.
The above areas do have a natural barrier against too much traffic. For the months of concern, the population from Juneau must transit around Point Retreat and navigate Southern Lynn Canal to get to these areas if they are hunting by boat. This is the same body of water that will often prevent the Alaska Marine Highway System from making scheduled trips due to wave height and wind. The FQU's are positioned in the heart of the best hunting areas, giving them distinct geographic advantage.
If the true problem is FQU's not meeting their ANS, there are alternatives to the above proposals. Perhaps the Subsistence Board could consider subsidies to the FQU's in terms of fuel or equipment. Another option may be to liberalize proxy hunting for the communities in need. But if the real reason the FQU is experiencing a decrease in deer harvest rates has to do with fewer hunters putting in fewer days we should not penalize other user groups who use the same resource for the same reasons.
I have been a resident of Alaska my entire life, nearly 45 years, and Sitka Blacktail Deer from the regions above are an important part of calories for myself and my family throughout the year. I would like to voice my support for keeping the hunting regulations as they are and not preventing NFQU's the opportunity to continue to utilize this healthy, renewable source of food in our region.
Sincerely-
Jared Erickson
Juneau, AK

[EXTERNAL] Comments RE: All Southeast deer proposals, including but not limited to WP22-07, WP22-08, WP22-09, and WP22-10

Kyle Ferguson <pabucktail@hotmail.com>
Mon 7/19/2021 5:34 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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As an over 20 year resident of Sitka, and a federally qualified subsistence deer hunter, I would like to state my opposition to the proposals attempting to limit the deer hunting opportunity for non-qualified hunters in Southeast Alaska. My opposition is for the following three reasons:

First, there is no valid scientific reason for the proposed limitations. There are currently no existing or anticipated population concerns for deer in Southeast Alaska. Deer numbers across the region are increasing. With the general pattern of mild winters in the last decade Admiralty, Baranof, and Chichagof deer numbers are as good as they've ever been. In GMU 3 it looks like deer numbers are the best they've been in at least a generation. Scientific study of deer numbers in GMU 4 showed that numbers are high enough to sustain a limit for all residents of 6 deer per year. Anecdotal information from hunters and people who live in Southeast's subsistence communities indicates the general impression of excellent deer numbers.

Secondly, there is no valid social reason for the proposed limitations. In a 7/16/21 article in the Sitka Sentinel members of the Regional Advisory Council were interviewed and stated their rationalizations for these proposals. The reasoning revolved around perceptions of unfairness related to boats and trucks owned by other hunters accessing hunting areas, and perceptions of increased competition and decreased opportunity for federally qualified users. Neither of these points stands up under the scrutiny of facts. No matter who we are, there will always be someone with a better truck or boat than any one of us. Being offended by this reality will make us all a bunch of victim-based thinkers, and in sum are the mere voice of emotions rather than real facts. In regards to the idea of increased competition and decreased opportunity, if anywhere were to qualify for such an idea it would be Sitka, the subsistence community with the greatest numbers of qualified, non-qualified and non-resident hunters. In spite of the greatest numbers of competition, Sitka hunters don't seem to have a problem meeting their subsistence deer meat needs. This fact was acknowledged by Sitka RAC member Harvey Kitka who stated Sitka hunters don't have the problems alluded to by the RAC members from other communities.

In contrast, there are actual social reasons for rejecting these proposals. Deer hunting anywhere, but especially in Southeast Alaska, is a time-honored activity which affords people an opportunity to sustain themselves while enjoying and passing on a heritage that transcends generations. We all live in small towns here. The reality is that for reasons of employment, marriage, medical concerns, education, or various other factors, any one of us could find ourselves with family members living in non-qualified Alaska communities, or down south. I hate to envision a scenario where a grandfather in Sitka, an uncle in Angoon, or father in Kake couldn't take a young person deer hunting because a proposal such as this made it illegal to mentor the next generation.

Lastly, data and facts shows there's no practical reason for the proposed limitations. In the same 7/16/21 Sitka Sentinel article ADF&G biologist Steve Bethune was interviewed. He pointed out some

interesting facts related to hunter effort. Across the region it seems hunting pressure is light. Additionally, non-qualified hunter effort has remained stable while hunting effort by qualified subsistence hunters has declined. I don't know why there are presumably less qualified subsistence hunters, or why the same numbers of hunters are hunting less days. But the fact remains that the data shows if anything, hunters in the communities involved in this proposal have even greater opportunity than they did ten or twenty years ago.

Thank you for your hearing and consideration,

Kyle Ferguson, Sitka

sent from Outlook

[EXTERNAL] opposition to these proposals

Ron Flint <ron@nuggetoutfitter.com>

Mon 7/19/2021 2:02 PM

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

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Federal Subsistence Board;

Count me in opposition to the following proposals.

1. western Admiralty from Sept 15 to Nov 30 that includes Hawk Inlet and south WP22-07
2. reduced bag limit for Chichagof (Hoonah and Tenakee, Freshwater Bay) from 3 to 2 WP22-08
3. closure of Lisianski Oct 15-Dec 31 WP22-09

Thank you for your time,

Ron Flint
12070 Cross St.
Juneau, AK. 99801

[EXTERNAL] Comments regarding 22-07, 22-09

Peter Flynn <flynn.peter@gmail.com>
Mon 7/19/2021 8:32 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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To whom it may concern,

I am an active hunter from Juneau, AK who would be affected by proposals 22-07 and 22-09. Myself and the group of people whom I hunt with also respect and hold great respect for the subsistence rights of other people in this state and wholly support their right to put food in the freezer. As hunters we hunt what only we can eat, aren't after trophies, and respect the land. We often hunt out of a cabin off the hoonah road system, always enjoying our conversations with neighbors and locals whether on the ferry, on the roads, or in town. We also fly into many of the affected areas, sometimes directly from juneau sometimes from other local airports, enjoying the cabins and beautifully different terrains that are available there. I am opposed to the aforementioned proposals as I believe there are better tools than closure to ensure that subsistence needs are protected without wholly excluding other parties, especially with such a healthy population of blacktails. Other tools are available that would provide for all affected parties such as altering bag limits depending on your subsistence qualification. Curtailing bag limits for non-subsistence-qualified hunters in these areas would keep subsistence as the dominant harvests while regional hunters from larger towns would be able to participate, as is being proposed in 22-08.

Thank you for your consideration,

Peter Flynn

[EXTERNAL] WP22-07, WP22-08, and WP22-09

Charles Frey <cfrey09@gmail.com>
Fri 7/16/2021 3:36 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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I am firmly opposed to WP22-07, WP22-08 and WP22-09. These proposals rely on hearsay & unscientific data to back up the proposed changes. The Alaska Dept of Fish & game who studies these areas is opposed as they cite healthy deer numbers. In addition, these areas are hard to access & have relatively light hunting pressure. This is pure & simple federal overreach & an attempt to lock down Alaska's wilderness for a self-serving reason by those in charge & those who sponsored these proposals.

Regards,
Charles Frey

[EXTERNAL] Opposition of proposals 22-07, 22-08 and 22-09

Mary Glaves <Mare_e86@hotmail.com>
Mon 7/19/2021 1:24 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Dear Federal Subsistence Board,

These proposals do not seem to be being proposed based on science and monitoring of deer populations. ADF&G recently INCREASED the annual bag limit of deer from 4-6 in Port Frederick. FQUs are also allotted an additional month (January 1-31) to subsistence hunt, which actually puts unnecessary pressure on deer during the hardest month of winter for the deer, and the easiest month for someone to harvest a deer as they get pushed down to the beaches. These proposals add unnecessary restrictions to Juneau and Ketchikan residents. ADF&G assessments for all units to do support these proposals. I, also, do not support them.

Mary Glaves

[EXTERNAL] opposition to all federal deer subsistance proposals. WP2207 -- Wp2212

RICHARD HARRIS <RHDevelopment@gci.net>

Thu 7/15/2021 12:38 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>
Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

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Attn: Theo Matuskowitz,
Office of Subsistence Management
Regarding : Federal deer subsistence proposals Region-1 Southeast Alaska
Proposal Numbers: WP2207, WP2208, WP2209, WP2210, WP2212

As a lifelong deer hunter of Southeast Alaska I am writing to oppose the federal subsistence proposals for deer harvesting in Southeast Alaska. I have hunted some of these areas my entire life, access to the areas listed is very difficult, needing good weather and much planning, I believe the weather controls much of the hunting pressure from non-federally qualified users in these areas(somewhat self regulating). I could understand supporting a lower per hunter harvest number in some areas, but shutting these areas down entirely during the period of Oct. 15 – Dec. 31, to non-federally qualified hunters is not acceptable. limiting hunting to any months other than Oct. 15 – Dec. 31 should be considered a complete shut down as this is the only period a hunter can actually hunt and experience the calling of a deer, during the rutting season. Any regulation changes made should include some changes to the federally qualified user as well, not all but some are doing as much damage to the resource with immediate access and extended hunt seasons as the non-federally qualified user who has limited access and shorter harvest seasons. Also as I understand these proposals have no basis, there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. I hope you will take these comments into consideration and reject these proposals.

Thank you,

Richard Harris
P.O. Box 32403
Juneau, Alaska 99803

Richard Harris

Territorial Sportsmen INC.

Post Office Box 32712 • Juneau, Alaska 99803

Telephone: (907) 789-2399 • Fax: (907) 586-6020

July 14, 2021

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

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-08) to reduce the deer hunting bag limit to 2 deer within the Northeast Chichagof Controlled Use Area (NECCUA) for non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on in NECCUA, ADF&G increased the annual bag limit from 4 to 6 deer west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort have remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer (compared to 3 deer for NFQUs). This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

TSI opposes this proposal and respectively asks that it not be adopted.

Sincerely,

Shawn Hooton
Vice President, TSI

Sportsmen Promoting Conservation of Alaska's Fish and Wildlife Since 1945

[EXTERNAL] Subsistence proposals for Sitka Blacktail Deer in AK

Brooks Horan <brookshoran@yahoo.com>
Wed 7/14/2021 9:58 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

3 attachments (2 MB)
WP22_09 ADFG comments Draft_Final.pdf; WP22_08 ADFG comments Draft_Final.pdf; WP22_07 ADFG comments Draft_Final.pdf;

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Dear Sir/Ma'am,
I am writing to express my lack of support for the proposed changes to sitka blacktail hunting in SE Alaska. The data just does not support these changes. I understand that the purpose of the subsistence board is to listen to rural residents in AK. I have respect for the decisions made by the board to ensure proper distribution of resources. As a past Kodiak resident, I experienced scientifically sound board decisions first hand, and benefited from them. But in this instance, the data does not support the proposed changes. Take the Lisianski proposal, the hunter data shows that success rates for rural residents/federally qualified users (FQUs) is the best in the state. Given that success rate, the actual number of rural resident hunters has decreased. There is just no mathematical or scientific reason to support this change to limit access to non-federally qualified users (NFQUs). I fear cutting such huge swaths of land out for FQUs will concentrate NFQUs into a smaller area making overall deer management that much more difficult. I strongly oppose these proposals as a scientist and as a resource user. I have attached the ADFG comments which represents the best evidence to support my input. Thank you for your time and for the work you do to ensure that the best science is followed in these management decisions. I hope this comment reaches you before the July 19th deadline and can be considered in your decision along with the comments of my fellow Alaskans.
Very Respectfully,
Brooks Horan

[EXTERNAL] Wildlife proposal 22-08

Aaron Hulett <aaronthenurse@icloud.com>

Sat 7/17/2021 10:14 AM

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

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Regarding wildlife proposal 22-08 on Chichagoff island in Alaska I would like to voice my opposition. The numbers of deer on the island and harvest data do not support the claims made. This change would have a dramatic negative impact on non-federally qualified users and minimal or no positive effect for federally qualified users.

Thank you,

Aaron Hulett
1670 Mendenhall Peninsula Rd
Juneau, AK 99801
(360)460-4179

[EXTERNAL] Opposition to WP22-07, WP22-08, WP22-09

Brandon Ivanowicz <blvanowicz@pndengineers.com>
Mon 7/19/2021 4:11 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Attention: Theo Matuskowitz

The intent of this email is to be on record in my opposition to the following proposals:

- WP22-07
- WP22-08
- WP22-09

I support the views of the Terrritorial Sportsmen, Inc. of Juneau and the Alaska Department of Fish and Game in their opposition to these proposals. Please see the attachment. Thank you. Brandon Ivanowicz.

There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters! - Territorial Sportsmen

≡ Navigation

Territorial Sportsmen

Representing the sporting lifestyle of Southeast Alaskans

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There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters!

Posted on July 17, 2021 by territorialsport in Homepage

Comments on these are due by this Monday, July 19, 2021 (email: subsistence@fws.gov or fax: 907-786-3898).

The first proposal (WP22-07) is a closure of most of west Admiralty Island September 15 – November 30 for Juneau hunters. This includes all areas south of Hawk Inlet. Here are TSI's comments opposing that proposal (& supporting ADF&G):

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-07) to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort is also declining. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

TSI opposes this proposal and respectively asks that it not be adopted.

The second proposal (WP22-08) reduces the bag limit from 3 to 2 deer for the Northeast Chichagof Controlled Use Area (NECCUA – Hoonah & Tenakee areas). Here are TSI's comments opposing that proposal (& supporting ADF&G):

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-08) to reduce the deer hunting bag limit to 2 deer within the Northeast Chichagof Controlled Use Area (NECCUA) for non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on in NECCUA, ADF&G increased the annual bag limit from 4 to 6 deer west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort have remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer (compared to 3 deer for NFQUs). This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

TSI opposes this proposal and respectively asks that it not be adopted.

The third proposal (WP22-09) is a closure of Lisianski Inlet, Lisianski Strait, & Stag Bay on Chichagof Island October 15 – December 31. Here are TSI's comments opposing that proposal (& supporting ADF&G):

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-09) to close deer hunting in Lisianski Inlet, Lisianski Strait, & Stag Bay on Chichagof Island from October 15 to December 31 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort has remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

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

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

[EXTERNAL] Wildlife proposals 22-07 through 22-09

Jones Chiropractic <akchiros@gmail.com>
Mon 7/19/2021 10:34 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Federal Subsistence Board
Office of Subsistence Management.
Attention: Theo Matuskowitz
1011 E. Tudor Road, MS-121
Anchorage, Alaska 99503

Dear Federal Subsistence Board,

I have deer hunted Admiralty Island and Chichagof Island for the last 25 years. From my personal experience, I wholly agree with Alaska Department of Fish and Game's (ADF&G's) assessments on the following proposals.

I oppose the Wildlife proposal 22-07 that attempts to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). I wholly support ADF&G's comments opposing this proposal.

I agree with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty (highest in the State), ADF&G increased the annual bag limit from 4 to 6 in 2019. Additionally, total hunting effort is relatively light and hunter efforts and harvests have declined.

ADF&G concludes the actual reason for the decline of federally qualified user (FQU) deer harvests are from a decline in participation and effort by FQU's, NOT depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort is also declining. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQU's, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-07 and respectively ask that it not be adopted.

I oppose Wildlife Proposal 22-08 that attempts to reduce the bag limit from 3 to 2 deer for the Northeast Chichagof Controlled Use Area (NECCUA).

I agree with ADF&G's, assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer in NECCUA, ADF&G increased the annual bag limit from 4 to 6 west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.

ADF&G concludes that the actual reason for the decline of FQU deer harvests is from a decline in participation and effort by FQU's, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort have remained stable. Additional, FQU's are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer, compared to 3 deer for NFQUs. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-08 and respectively ask that it not be adopted.

I oppose Wildlife Proposal 22-09 that attempts a closure of Lisianski Inlet, Lisianski Strait, and Stag Bay of Chichagof Island October 15 to December 31.

I agree with ADF&G's, assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 in 2019. Additionally, total hunting effort is relatively light and hunter efforts and harvests have declined.

ADF&G concludes that the actual reason for the decline of FQU deer harvests is from a decline in participation and effort by FQU's, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort have remained stable. Additional, FQU's are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-09 and respectively ask that it not be adopted.

Warm Regards,

Resident Hunter of Alaska
--
Dr. Stefanie Jones

10004 Glacier Hwy
Suite B
Juneau, AK 99801

[EXTERNAL] WP-22 07,08 and 09

David Keller <saltheart76@gmail.com>

Mon 7/19/2021 1:58 PM

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

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Good afternoon,

I am writing to you today to voice my opposition to proposed regulation changes WP-22 07, 08 and 09. I feel that the changes, if approved, would negatively affect hunters who do not qualify for subsistence permits.

Thank you for considering my comments.

Regards,

[EXTERNAL] WP22-(8,9,10) comment

elickirby@gmail.com <elickirby@gmail.com>
Sun 7/4/2021 11:00 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Hopefully I got the numbers correct for the sections on the deer limits for the areas around pelican hoonah and angoon. I think a reduction in harvest limit like the one proposed in pelican will be more effective while also allowing people like myself(juneau resident) access and use of the forest. Even a reduction to 2 deer per season in these areas would cause a large reduction in the game taken while allowing us to still hunt. The area around the mainland of juneau receives a lot of pressure so the ability to hunt outside has a lot of value for people like me who primarily eat deer, bear, and moose throughout the year.
Thanks for your time and protection of the forests.
Sincerely
Elic Kirby

[EXTERNAL] Changes 22-07 22-08 and 22-09

Chris klawonn <chris.klawonn@gmail.com>
Fri 7/2/2021 7:18 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello,

My name is Chris Klawonn, I live in Juneau and have been a resident in Juneau for a vast majority of my life. I plan on raising my children here, and I have loved the aspect of boating, fishing, and hunting my entire life. I'd like to keep this short and simple as I hope you are busy reading lots of comments on this topic. Closing the back side of admiralty to specifically Juneau residents is unnecessary, and would be costly and near impossible to regulate.
The number of Juneau residents hovers around 35,000, the total number of reported hunters in GMU 4 that reported a harvest in 2019 is 3,377 according to the ADF&G website. Let's assume that every single one of those harvests came from Juneau, which I know from friends and Facebook isn't the case, that's only 1 in 10 people that live in Juneau claiming deer on admiralty. I don't see this as anything near an issue effecting deer population on admiralty.
Second, if this proposition did pass you'd need troopers to nearly constantly monitor the back side of admiralty to ensure that nobody is breaking the law. How many officers, boats, and planes would it take to find the few boats from Juneau to genuinely balance the manpower, equipment, and fuel costs.
Please understand, I realize the people's frustration of seeing pictures with a huge commercial fishing boat with 20 deer on the bow, and realize that this is a bit excessive on the taking of such a great resource. Even worse is hearing the wonton waste of deer or really any animals, on this island or in any other location. But to squarely place the blame for this on the residents of Juneau is wrong.
Admiralty island is 1,646.4 square miles, making it the 7th largest island in the United States. Cutting off half of it to one community of 3000 or so hunters isn't right, and I hope you can see my side.

Good luck with your decision and thank you for your time.

[EXTERNAL] Object to Proposals

Jay/Amy Lloyd <jayamylloyd@gmail.com>
Mon 7/19/2021 12:28 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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I would like to submit my objection to proposals WP22-07, WP22-08 and WP22-09.

The abundance of the animals in the areas as stated by the Alaska Department of Fish and Games objection to the proposals does not warrant this action. Federally qualified hunters also have an extended season that they can hunt these areas. I do not feel that these proposals are necessary or required at this time.

Sincerely,
Jay Lloyd

[EXTERNAL] Comments opposed to proposals WP22-07, WP-08, and WP-09

David Love <pandalid@yahoo.com>
Tue 7/13/2021 11:51 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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These comments concern Federal subsistence management program's Proposals WP22-07, WP22-08, and WP22-09.

As a hunter who lives in a non-subsistence area (Juneau) but uses sport hunting means to harvest wild game which is an essential source of protein for my annual sustenance, it is my observation (borne out by the ADF&G surveys) that there is not a conservation need to limit sport harvest of deer in any part of Unit 4, Southeast Alaska.

ADF&G Wildlife Conservation has many years of objective, quantitative data that shows that the deer populations in Unit 4 are not depleted, but are in fact at high and stable population levels, even after the heavy snow year of 2020/2021. Restrictions on non-subsistence hunters is not necessary and unfairly targets sport hunters whose numbers and hunt days are stable when NFQUs are declining. Also, the average number of deer harvested in Unit 4 has been stable for all users for 10+ years with good success rates in deer harvested. There is not increasing competition for deer among FQUs and NFQUs.

I urge the Federal Board to NOT support these proposals, and vote to oppose these proposals, since their claims are not true compared to the objective, quantified data showing strong population trends and stable deer harvest in Unit 4.

Thank you for your time, David Love, hunter and resident of Juneau

[EXTERNAL] Southeast proposed subsistence deer limitations

Charlie Martelle <martellec@yahoo.com>
Tue 6/29/2021 10:29 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Hello,

I am writing about the proposed changes of wp-22 07, Wp-22 08, and wp-22 09. I am not in favor of limiting Juneau residents on these areas. I rely on wild game as my main source of protein. By limiting me and other residents of Juneau we will see an increase in the number of hunters in the areas that are not mentioned. This would mean it would be harder to get away from others and find the game we fill our freezers when we hunt closer to town.

We are already so limited in Juneau with hunting, one needs to either have a boat or charter a float plane to find "good" hunting. By dropping the limit on the road system in hoonah you would essentially take our one hunt that doesn't require owning a vessel or chartering.

From my experience on the coast there is abundant numbers of deer, same with the south west side of admiralty. If there was a shortage of animals I would be all for reducing bag limit, but I do not believe this is the case.

Again I am against any changes to the current regulations.

Thank you for your time
Charlie Martelle

Sent from Yahoo Mail for iPhone

[EXTERNAL] Federal subsistence hunting and trapping regulations comment 2021

Sarah Matula <s_matula1@yahoo.com>
Mon 7/19/2021 1:14 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Federal Subsistence Board Members,

I am writing to comment in respectful opposition to the regulatory actions proposed in WP22-07, WP22-08, WP22-09, WP22-10. I have been a resident of Juneau for 8 years, and have been lucky enough to have gained relationships with people through out SE. Through these relationships, I have had the opportunity to learn, experience, and put into practice in my own life the respect and appreciation for the substance lifestyle.

I would ask Federal Subsistence Board members to very carefully consider these proposals that significantly reduce available hunting areas to residents of Juneau. As you know, just because someone lives in a larger community like Juneau, does not mean they don't live a subsistence lifestyle and place great cultural, traditional, and personal value on a connection to the natural world that is based on procuring food for themselves, their family, and their community. The closures and bag limits reductions in these proposals would significantly impact traditional hunting use patterns for many people who live in Juneau and should only be enacted in extremely dire circumstances.

Thank you for your time-
Sarah Matula, Douglas, Alaska

[EXTERNAL] WP 22-07; WP 22-08; WP 22-09; WP 22-10

Grey Mitchell <fullcurl@live.com>
Wed 7/14/2021 9:04 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Attn: Theo Matuskowitz, Office of Subsistence Management

I am writing to oppose the referenced federal subsistence proposals for deer in Southeast Alaska as listed above. These proposals have no basis, as there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. Without specific data to demonstrate a particular subsistence purpose, these proposals are not only arbitrary and capricious, but they will violate the constitutional rights of non-federally qualified users. The credibility of federal subsistence management of wildlife resources on public lands hinges on the use of scientific data. Not only do these proposals lack scientific data, they lack any data to demonstrate a justified subsistence need. I urge the rejection of these unsupported and unjust proposals. Thank you.

Grey Mitchell
Alaskan since 1966
3065 Douglas Highway
Juneau, Alaska 99801

Sent from my iPhone

[EXTERNAL] WP22-07, WP22-08, WP22-09

Richard Morris <akreeldeal@gmail.com>
Mon 7/19/2021 8:40 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Attention Teo Matuskowitz

Good day,

There are a few proposals that I am writing in opposition to.

The first is WP22-07, which proposes to close the western side of Admiralty from Hawk inlet to the southern tip to non-federal users to make it easier for one group to gather food. I also try to fill my freezer with wild game so this would be selecting them over me. Although I have never hunted the area due to its remoteness and difficulty to get to during the hunting season I feel it will be a stepping stone to closing more of the National Forest as they request larger areas to make it easier for them and more difficult for others. I would say that looking at the ADFG hunt records would show that the majority of hunt effort from Juneau is on the eastern side of Admiralty island and any that can make it to the proposed area would say that hunting there is so much more easy than the eastern side. It is all relative.

WP22-08 is the looking to close the northern area of Chichagof island to non-federal users. I bought property in Freshwater bay for the main purpose of hunting. There are already regulations in place that have a harvest limit of 3 deer versus the 6 I could shoot anywhere else on the ABC islands. This is another remote area for someone from Juneau to access and has limited pressure from Juneau as could be found in the hunt records. The majority of deer that are harvested in the area are mainly road hunts as there is an abundance of logging roads throughout the area. As is the case with hunting, it can be challenging for those that don't get out into the forest and expect to fill there freezer shooting deer on the side of the road. Closing this area would impact the value of my cabin and experiences that come with having it there.

WP22-09 is looking to close other areas in the Hoonah area. Again, due to the remoteness this area does not get a lot of pressure from non-federal users.

In closing, these three proposals are trying to make harvesting deer a sure thing for the communities of Angoon and Hoonah. It is hunting, there are no guarantees that you will see a deer, let alone harvest one. Closing these areas will only benefit a few, and probably only to a small degree. These

areas are in the Tongass National Forest, which is to be managed for all user groups. With these proposals it will start to be managed for the select few and I oppose it.

Thank you,

Rich Morris

[EXTERNAL] Wildlife Proposal 22-07, 22-08, 22-09

Michael Nelson <michaelbn78@gmail.com>

Thu 7/1/2021 2:49 PM

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

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I am writing in opposition of these specific proposals, Wildlife Proposal 22-07, Wildlife Proposal 22-08 and Wildlife Proposal 22-09.

These proposals discriminate against Juneau residents unjustly. Excluding the small percentage of Juneau residents that have the ability to hunt in these areas will not increase subsistence means.

Michael Nelson
208-755-7618

[EXTERNAL] WP22-08 comments

nicholasporr <nicholasporr@yahoo.com>

Sun 7/18/2021 11:34 AM

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

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I am writing to urge the board not to pass proposal WP22-08, which would reduce the bag limit to 2 deer for non-federally qualified hunters. There is no shortage of deer in the hoonah area nor are non-federally qualified hunters displacing Hoonah hunters. I understand that last November was quite challenging for all hunters, though this is likely due to the ice storm that passed over northern southeast Alaska. In addition to being unnecessary for federally qualified hunters to meet their subsistence needs, this proposal will needlessly affect a number of cabin owners in Freshwater Bay. These hunters are typically not hunting the road system and are not placing any pressure on road system deer. For these reasons, I ask the board to not pass this proposal.

[EXTERNAL] Proposals 22-07,08,09,10

Tom Radandt <tomradandt0@gmail.com>

Fri 7/9/2021 2:52 PM

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

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There is no scientific evidence that supports the idea that non-Federally qualified users impact the success of qualified users. Therefore you must reject proposals 22-07, 22-08, 22-09 and 22-10.

To favor one group over another bases on any political characteristics is discrimination, which illegal.

Tom

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

Mark Sams <msams@pndengineers.com>
Mon 7/19/2021 7:53 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Attention: Teo Matuskowitz

I would like to make a few opposition comments on the below listed federal subsistence deer hunting proposals

WP22-07
I oppose this change to the deer hunting regulations on the Chatham straight side of Admiralty Island. The regulation will only isolate one user group which has a very low impact on the area due to the distance from Juneau. Due to the distance Juneau residence do not regularly access this area since it is more than 1.5-2hr run time. All other local communities are subsistence communities including, Petersburg, Kake, Tenekee, and Hoonah, leaving Juneau, the furthest community from the location a user group that would be isolated. I think it would be very easy to look at the hunting records collected by the state of Alaska every year to determine how much pressure Juneau actually has on the location to determine how much this change in regulations would actually effect the overall hunting pressure.

WP22-08
I oppose this change to the northern Chichagof Island since it again singles out a single user group. I currently Own a cabin on norther Chichagof Island but am a Juneau resident. This proposed change would limit my access to deer hunting at my cabin which I have invested heavily in over the past 5 years to use as a place to hunt. For me, the area is difficult to access from Juneau due to weather and distance, over 2hrs. Again if you look at hunting records, I believe you would find Juneau residences have a limited impact on the overall harvest on Norther Chichagof Island.

WP22-09
I oppose this change in regulations for closing deer hunting in Lisianski Inlet. This area is also very remote and very difficult for non-subsistence hunters, Juneau residence, to access. Hunting records should show that this area is seldomly access from Juneau this time of year due to weather so this proposal will have little effect on competition. The only residences this change will effect are from Juneau since access is limited to Pelican and Elfin Cove.

In general I believe instating restrictions that only effect one group is a poor decision that becomes a slippery slope for other communities to make similar requests. Pretty soon, Juneau would have very limited hunting locations in a National Forest that is supposed to be managed for all user groups. If subsistence user groups are having difficulty harvesting deer, maybe that's an indication that the bag limits for all groups are to high and a better proposal would be to limit all harvest verses a single user group that has low impact on all three proposed areas. Another option would be to limit the ability to proxy hunt. I know fishermen can go out and

get to these remote places in the winter and shoot more deer than their limit due to proxy hunting. I understand the need for it in certain instances, but maybe limiting the number of proxy tags allowed to hunt at one time would help spread the pressure out over a longer period and less deer would be harvested. This would reduce the overall pressure and competition for sub-subsistence harvesters.

Historically these areas being proposed, as all deer habitat, is far more effected by weather and old growth timber harvests(heavy snow and large scale timber clear cuts) than the limited number of hunters. When these environmental and man-made (timber harvest) factors affect the population, all hunters are effected equally.

These proposed changes will also hurt any non-resident hunting charters that are based out of these local communities, hurting the local economies. Non-resident hunters will bring a large boost to these small communities at the end of the typical tourist season helping fortify the community with funds to weather the winter. Out of town hunters will not use Angoon based on the proposed WP22-07 since they would be very limited in hunting locations.

Thank you for taking the time to read my comments.

Mark Sams
Owner of Cabin in Freshwater Bay, Directly effected by 2 out of three of these proposed changes.

[EXTERNAL] Opposition of Federal subsistence proposals Southeast Alaska for deer WP 2207, wp2208, wp2209, wp2210, wp 2212

CHARLES SCHULTZ <cjs16@me.com>
Sun 7/18/2021 3:53 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Attention Theo Matuskowitz,
Office of Subsistence Management

I am writing to oppose the federal subsistence proposals that affect Southeast Alaska Deer hunting. I oppose WP2207, WP22-08, WP22-09, WP22-10, and WP22-12.
Proposals WP22-07, WP 22-08, WP22-09 and prevents non-qualified subsistence users from access to deer hunting on public lands. As an Alaskan resident I also rely on deer meat as a primary source of red meat that is locally available. Limiting non-qualified subsistence users from access to hunt deer in areas around Angoon, Hoonah and Pelican is entirely unfair to those who live in other areas of the state, who are non-qualified Subsistence hunters. There is no science to suggest that the over harvest of deer is related to non-qualified subsistence users, in fact I would suggest that the over harvest in the areas around Hoohah, Angoon, and Pelican may actually be from the subsistence users who may be killing every available deer seen in late season, on the beach and uncaring if the deer is antlerless and uncaring of size. Preservation of breeding antlerless deer may prove to allow fawn bearing deer an opportunity to give birth in the spring. Also education of subsistence hunters to harvest mature deer would improve the size of deer and thereby increase the available pounds of edible meat.

Extending the season in unit 6 is exactly a dichotomy of what the Subsistence Board may be wanting to achieve. The complaint of less harvestable deer will only be compounded if deer seasons are extended during their most vulnerable times. Then the subsistence deer harvest will continue to over extend the available deer to breed for next year, and likely they will complain that non-subsistence harvest is the blame.

Hunters of deer need equal access to public lands. We are all Alaskans trying to provide natural, local deer meat.

Please take the comments of non-subsistence hunters into consideration.
Also consider making all Alaskans subsistence users. We all live here. We all have subsistence needs, not based on size of community we live in.

Thanks for your consideration ,
Charles Schultz
Juneau, Alaska

SCI Alaska Chapter
Eagle River, Alaska 99577
Cell (907) 903-8329
Tel: (907) 980-9018
www.aksafariclub.org

July 19, 2021

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

[Electronic Submission]
subsistence@fws.gov

RE: SCI-AK comments on Wildlife Proposal 22-08 Hoonah

Dear Chairman Matuskowitz,

The Safari Club International Alaska Chapter (SCI-AK) writes in opposition to Wildlife Proposal 22-08 (WP22-08). Founded in 1971, Safari Club International is the country's leading hunter rights advocate and additionally promotes worldwide wildlife conservation. SCI-AK is nationally and internationally recognized for its contributions in support of SCI's four major mission areas: Advocacy, Conservation, Education, and Humanitarian Services.

WP22-08 is counter to our goal of ensuring fair and equitable access to game resources in Alaska. The below comments focus on the indices of deer abundance, deer hunter effort, and harvest in Alaska Game Management Unit 4 (GMU 4) as reasons to reject WP22-08.

The proposal claims that non-federally qualified users (NFQU) are unfairly competing with federally qualified users (FQU) when hunting Sitka black-tailed deer in GMU 4. WP22-08 asserts that the deer population on western Admiralty Island is depleted and that in recent years FQUs have had difficulty meeting their subsistence needs because of increasing competition from NFQUs. Alaska Department of Fish and Game (ADF&G) analysis of deer population, hunter effort, and harvest trends found no support for either contention. Instead, the available indicators support that deer remain abundant throughout GMU 4.

GMU 4 encompasses the ABC Islands (Admiralty, Baranof, and Chichagof) and the surrounding archipelago. Hunters residing in Southeast Alaska (GMUs 1-5), excluding 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 to January 31 with a bag limit of 6 deer (bucks only August 1 – September 14). The current State season is August 1 to December 31 with a bag limit of 6 deer (bucks only August 1 – September 14). In 2019, the Alaska Board of Game increased the deer bag limit in GMU 4 from 4 to 6 deer because of the GMU's uniquely healthy population of Sitka black-tailed deer.

GMU 4 consistently shows a high black-tailed population. Pellet group counts are usually well above the high-density threshold and are often double the counts in other GMUs. Aerial surveys — measured in deer/hour sighted — were conducted for two locations in GMU 4, Southern Admiralty Island (2015-2017) and Northeast Chichagof Island (2017-2018). Southern Admiralty had the highest deer/hour of any survey area in Southeast Alaska and estimates from Northeast Chichagof were similar to Prince of Wales Island (POW) and higher than all other survey areas except Southern Admiralty and POW.

Management biologists in GMU 4 began conducting beach mortality transects in the early 1990s. Although these mortality surveys are a relatively insensitive indicator of population trend, they are an indicator of mortality resulting from severe

winters. 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. Yet, based on harvest and other indicators of deer abundance, managers believe the deer population had fully recovered by the 2013 season.

GMU 4 Sitka black-tailed deer are usually above the high-density threshold and are often double the counts in other GMUs. Although the area affected by this proposal is rarely sampled, this broad index of deer abundance suggests the GMU 4 population remains at high levels with no indication of depleted populations or conservation concerns. Taken together, these indices of deer abundance — pellet group surveys, alpine counts, mortality transects — suggest this proposal cannot be based entirely on a conservation concern.

Overhunting is often used as a justification for area closures or implementation of restrictive conservation measures. ADF&G produces estimates for hunter effort and harvest using information provided by hunters. To hunt deer in Southeast Alaska all hunters must obtain harvest tickets. Since 2011 harvest tickets have come with a mandatory reporting requirement. From 1997-2019 the estimated average annual harvest in GMU 4 has been 5,725 deer taken by 3,282 hunters. GMU 4 supports the highest deer harvest in the state and the historical harvest has remained fairly stable with between 5,000-7,000 deer harvested annually. The exception being the severe winter of 2006/2007 when high harvest was followed by significant overwinter mortality of deer throughout GMU 4. This resulted in a precipitous decline in harvest from 7,900 deer in 2006 to 1,932 deer in 2007.

Long-term records indicate a declining trend in harvest for both FQUs and NFQUs. From 1997 to 2006, FQUs harvested on average 152 deer annually. Since 2013, FQUs have harvested an average of 49 deer annually. This represents an approximate 70% decline. There is a similar pattern for NFQUs, who averaged 349 deer annually from 1997-2006. Since 2013, that average has declined to 115 deer annually. SCI-AK notes hunter numbers are decreasing across the board on a national level, not just in Alaska or even GMU 4. This proposal will further restrict access for hunters and lead to a further decrease in the number of hunter's in one of the state's most viable hunting regions.

The Alaska Board of Game has also established an annual amount reasonably necessary for subsistence (ANS) for deer in GMU 4 of 5,200-6,000 deer. ANS differs from the undefined term "subsistence need" used in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Under Alaska law, ANS is the harvestable portion of a game population that is sufficient to provide a reasonable opportunity for subsistence uses. "Reasonable opportunity" is that which allows a normally diligent hunter a reasonable expectation of success. The board establishes an ANS for a game population through review of long-term population and harvest information. With deer harvest levels within the recommended ANS range, the argument that the closure needs to occur in order to benefit ANS users is moot.

SCI-AK members are especially supportive of family hunting traditions because learning to hunt starts with family and community mentors. FCU status is not inherited. Children who leave federally qualified communities to attend school elsewhere will be excluded and harmed by WP22-08. In November, many FCUs invite their family members home for peak season deer hunts. Other NFCUs return to traditional hunting areas to harvest deer on state hunting proxies or kill deer on their limit to share with family, friends, or elders. None of this use would be allowed to continue in the WP22-08 area if it is passed.

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, the department has concluded that there is no conservation concern for the GMU 4 deer population. With deer population remaining high and stable, harvest within its historical range, and state ANS requirements being met it is unnecessary to restrict hunting in GMU 4 to the benefit of a small handful of users. WP22-08 will reduce the amount of deer meat coming into communities while simultaneously failing to provide conservation benefits to an already healthy deer population. SCI-AK urges you to not adopt WP22-08.

Thank you for your consideration.

John Sturgeon
SCI Alaska Chapter President
E-mail: president@aksafariclub.org
Cell: (907) 230-0072

Safari Club International Alaska Chapter
First for Hunters - First for Wildlife

[EXTERNAL] Wp22-08 wp22-07

isaiah Sipniewski <stansipak@gmail.com>
Thu 7/15/2021 8:09 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Hello,

I'm writing this email in regards to the recent proposals for restrictions on harvesting deer in the above subject line.

As a Juneau resident of 20 years I have enjoyed hunting these areas on chichicoff Island and the south end of admiralty Island.

I have a family cabin on admiralty at the southern end where dating back as far as my wife's grandfather, has used for hunting deer.
There is no decline in deer population and no reason why this area should be restricted to Juneau hunters. There are more than enough deer for those who choose to "break suction from there truck or boat seat" and hike to find deer.

I have family in hoonah who I have enjoyed staying with and hiking the mountains together. Taking my sons and teaching them how to navigate the mountains. On the road systems in hoonah I have enjoyed hiking to my favorite spots for as long as ive lived in Alaska.

I see no good reason why any of the 3 proposals should even be on the table.
If people are complaining of not enough deer it is due to their own laziness and unwillingness to hike into the woods for deer. There are more than enough for the surrounding residents and residents of Juneau.

Thank you for taking my comments into consideration.

Stanley sipniewski

[EXTERNAL] Subsistence Hunting Closure

Peter Strow <pstrow@hotmail.com>
Mon 7/19/2021 5:20 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Hello,

I would like to submit a commit regarding the closure of hunting to Juneau residents for WP22-07, WP22-08 and WP22-09. I don't believe these areas should be closed to Juneau hunters. Accessible hunting is difficult in Southeast Alaska and many Juneau residents depend hunting deer in these areas. Proposing these closings should be backed by scientific data and I think this needs to be further studied before any closures are passed.

Thank you,
Peter Strow

Sent from my iPhone

SPORTSMEN'S ALLIANCE

July 16, 2021

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

RE: Comments on WP22-07 Closure to non-Federally qualified users, Admiralty Island; WP22-08 Place a harvest restriction on non-Federally qualified users, Northeast Chichagof Controlled Use Area; WP22-09 Closure to non-Federally qualified users, Lisianski Strait; WP22-10 Lower harvest limits for non-Federally qualified users, Lisianski Strait;

Dear members of the Federal Subsistence Board:

The Sportsmen's Alliance is a leading national organization that defends the right of our members to hunt, fish and trap in all 50 states. I am writing today to urge you to use sound scientific evidence to discharge policy related to changing existing hunting seasons, harvest limits and methods and means of taking wildlife related to federal subsistence hunting and trapping and more specifically proposals WP22-07, WP22-08, WP22-09 and WP22-10.

The Sportsmen's Alliance strongly believes that if populations are abundant than all public land users in the Alaska should have access to these lands for hunting and trapping. These lands are managed and conserved using public funds contributed by sportsmen across Alaska and the United States through license fees and excise taxes paid on the purchase of firearms and other hunting equipment.

When determining whether to close certain federal lands to land users that are non-subsistence hunters, the Alliance on behalf of our Alaska members urge you to follow scientific evidence and population data to determine the best course of action. If wildlife populations numbers indicate abundant numbers of game species these lands should remain open to both subsistence hunters and non-subsistence hunters. The North American Model of Wildlife Conservation dictates that science should be the guiding tool for discharging wildlife policy and our membership stands firmly on the principles of this model.

We understand the complex nature of this decision, so we urge you to make these determinations based solely on science and not based on political or social pressure. Thank you for the opportunity to comment on this issue and thank you for your time.

Best,

Jacob Hupp
Sportsmen's Alliance
Associate Director of State Services

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

Dillon Tomaro <dillonpaultomaro@gmail.com>
Mon 7/19/2021 9:06 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I would like to make a few opposition comments on the below listed federal subsistence deer hunting proposals

WP22-07

I oppose this proposed change to the 2022 regulations. I have been hunting south of Hawk Inlet towards and beyond Angoon my whole life and I have not witnessed any decrease in deer population other than the years following an excessive amount of snow that caused the yearlings to die. I have had nothing but pleasant encounters with the hunters of Angoon and they always seem to kill more deer than us at ease with their local knowledge (same concept that I would have a better knowledge of the landscape, and therefore the upper hand with hunting in the Barlow area). That is some of my favorite hunting territory with all of the old growth that you cannot find north of Hawk Inlet. I also enjoy hunting Florence Lake which would be affected by this proposal. Rarely do I encounter other hunters from Juneau when I am hunting South of Hawk Inlet and I believe this should be easy to see by looking at peoples hunting reports. I do not think that the Juneau residents' impact on the deer population south of Hawk inlet is significant at all and there is no way that it is hurting the Angoon residents' harvest needs. If this proposal goes through then to be fair, the Angoon residents should not be able to hunt north of Hawk Inlet (even though it is the same case that their hunting has no impact on Juneau residents deer population). There has been no problem in the past with Juneau residents affecting the Angoon residents hunting opportunity and I believe it is simply unfair to go through with this proposal.

WP22-08

I oppose this proposed change to the 2022 regulations. I believe that again the Juneau resident impact is very low in this area.

Thank you for taking the time to read my comments.

Dillon Tomaro

Lifelong Southeast Alaska Hunter

[EXTERNAL] Comment on WP22-08, WP22-09, WP22-07

John Unzicker <jmunzicker@gmail.com>
Wed 6/30/2021 8:56 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>

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Hello,

This comment is regarding the following proposals:
WP22-08, WP22-09, WP22-07

We are all Alaska state residents and have the right to utilize all of the state land regardless of our primary residence. As a lifelong Juneau resident who pays the same fees to hunt game in SE AK as anyone else in the state, I am extremely discouraged by these proposals.

Juneauites would be forced out of major hunting areas during the prime time of the season. If Juneau residents are not allowed to hunt the far, outlying areas, we will all be forced to hunt the immediate areas around Juneau which will result in over-hunting, overcrowding, and less game around Juneau. This proposal is absolutely inequitable and will divide communities.

What about hunters who have cabins or family in Hoonah, Pelican, or Angoon? This is absolutely wrong and only goes to serve a very small population of the state. Residents of Juneau have just as much right to hunt these zones as the residents of Hoonah, Pelican, and Angoon have the right to hunt anywhere in the state. There is enough wildlife and land for everyone to utilize for subsistence and it should be shared equally.

And does this mean that any other resident not from Juneau can hunt these areas? Sitka? Haines? Gustavus? Petersburg? Why only Juneau?

Thank you,
John Unzicker
2016 Glacier Bear Blvd.
Juneau, AK. 99801
907-723-3191

[EXTERNAL] proposals WP22-7, WP22-8 and WP22-9

Luke Woodruff <alaskan_waters@yahoo.com>
Wed 6/30/2021 9:23 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Please do not consider the new proposals WP22-7, WP22-8 and WP22-9 as new regulation. I do not believe the current deer harvest levels combined with predation/winter kills deem this kind of proposal necessary. Subsistence and non subsistence communities alike count on deer as a part of their diet along with fish, water fowl and berries. Every year is different, sometimes hunting is difficult and other times not. Let's avoid creating regulations that favor one group over another because one group thinks they are having to work harder.

Luke Woodruff
Juneau, AK

Sent from Yahoo Mail for iPhone

[EXTERNAL] WP22-09

greg-donica@gci.net <greg-donica@gci.net>

Mon 7/19/2021 12:06 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>; deanna.perry@usda.gov <deanna.perry@usda.gov>
Cc: Norm and Linda Carson <nlcarson@att.net>

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To Southeast Subsistence Regional Advisory Council:

There have been many personal discussions lately on deer hunting in Lisianski Inlet and Pelican area. Almost to the point of "Hatfield & McCoys" situation.
It seems pretty simple to me. Alaska Fish & Game has done a good job of managing the hunting of deer. The rules and regulations in place are reasonable, practical and effective. Abide by them. Until there is obvious and proven data to verify a severe reduction in deer population, leave it as it is.
ALL hunters should use good judgement when hunting, doing so in a safe manner. They should be aware of and respect personal property, be it a year around residence or a cabin. Don't hunt so near.
There are times when bears are in abundance and their food sources are not. Extreme fall & winter weather can also contribute to more deer being taken by bears. And yet, data does not support any reduction in deer population, due to bears or hunters. Should that ever happen, then cut the limit of deer to be taken. If a hunter knows he/she will not use the amount of deer allowed, take less.
My husband has hunted in this area with other family members who live in Pelican, our son-in-law as well. We have been property owners in Pelican for twenty years. Generations of families still hunt there and hope to continue to do so. They may not be FQU. For some reason, that has been a topic that is causing those who are and those who are not, to be divided and confrontational. Is that really necessary?
Be a legal and responsible hunter.
Please consider this an opposition to WP22-09, and also WP22-07, WP22-08, & Wo22-10.

Thank you,
Greg & Donica Jerue
PO Box 211434
Auke Bay, Ak. 99821

[EXTERNAL] opposition to all federal deer subsistance proposals. WP2207 -- Wp2212

RICHARD HARRIS <RHDevelopment@gci.net>

Thu 7/15/2021 12:38 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>
Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

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Attn: Theo Matuskowitz,
Office of Subsistence Management
Regarding : Federal deer subsistence proposals Region-1 Southeast Alaska
Proposal Numbers: WP2207, WP2208, WP2209, WP2210, WP2212

As a lifelong deer hunter of Southeast Alaska I am writing to oppose the federal subsistence proposals for deer harvesting in Southeast Alaska. I have hunted some of these areas my entire life, access to the areas listed is very difficult, needing good weather and much planning, I believe the weather controls much of the hunting pressure from non-federally qualified users in these areas(somewhat self regulating). I could understand supporting a lower per hunter harvest number in some areas, but shutting these areas down entirely during the period of Oct. 15 – Dec. 31, to non-federally qualified hunters is not acceptable. limiting hunting to any months other than Oct. 15 – Dec. 31 should be considered a complete shut down as this is the only period a hunter can actually hunt and experience the calling of a deer, during the rutting season. Any regulation changes made should include some changes to the federally qualified user as well, not all but some are doing as much damage to the resource with immediate access and extended hunt seasons as the non-federally qualified user who has limited access and shorter harvest seasons. Also as I understand these proposals have no basis, there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. I hope you will take these comments into consideration and reject these proposals.

Thank you,

Richard Harris
P.O. Box 32403
Juneau, Alaska 99803

Richard Harris