

WRITTEN PUBLIC COMMENTS FOR WP24-05

(Apologies for the Delay)

1 Support

33 Oppose

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

- Ryan Beason

Fw: [EXTERNAL] Proposals to limit deer hunting in SE Alaska**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:29 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

*Theo Matuskowitz
Supervisory Regulations Specialist
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1011 East Tudor Road, MS 121
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theo_matuskowitz@fws.gov*

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

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

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I am writing to address the following proposals: WP24-04, WP24-05, and WP24-06.
In short, I am adamantly opposed to these proposals.

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

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

Sincerely,
Arthur C Dunn

Fw: [EXTERNAL] WP24-04 and WP24-05**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:14 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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

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From: Patrick malecha <patmalecha55@gmail.com>**Sent:** Friday, June 30, 2023 11:29 PM**To:** AK Subsistence, FW7 <subsistence@fws.gov>**Subject:** [EXTERNAL] WP24-04 and WP24-05

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Federal Subsistence Boards
Attn: Theo Matuskowitz,

Office of Subsistence Management

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

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

Respectfully,
Pat Malecha

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

June 29, 2023

Dear Federal Subsistence Board,

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

Sincerely,

Juneau Douglas Advisory Committee

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

Dear Federal Subsistence Board,

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

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

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

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

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

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

Fw: [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:21 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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

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

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Mr. Matuskowitz,

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

Thank you for considering my comments.

John Bohan
Juneau Alaska

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

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:18 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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

Sent: Friday, June 30, 2023 3:28 PM

To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

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

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From: Go Hawks <kennethsteven80@gmail.com>

Sent: Friday, June 30, 2023 9:46 AM

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

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

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Mr. Muskowitz,

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

Ken Brown
Juneau

Fw: [EXTERNAL] Response to WP04 4 thru 6**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:21 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>**Sent:** Wednesday, June 28, 2023 11:07 AM**To:** Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>**Subject:** Fw: [EXTERNAL] Response to WP04 4 thru 6

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

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Parking? Missed shots? and anchoring....really!

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

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

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

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

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

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

Thank you for this opportunity to respond....

Sent from my iPhone

Fw: [EXTERNAL] Public Comment on Proposed SEAK Deer Season Changes**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:25 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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

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

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Good Morning,

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

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

Thank you for your time.

Matt Creswell
Juneau

Fw: [EXTERNAL] Federal Subsistence Board Proposals WP24-04, WP24-05 and WP24-06**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:25 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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

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

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Attn: Mr. Theo Matuskowitz

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

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

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

Respectfully,

John DeMuth
Juneau, Alaska

Fw: [EXTERNAL] Opposition to proposals**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:28 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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

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

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Good morning-

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

Thanks for the opportunity to comment!

Jason Hass

Fw: [EXTERNAL] Federal proposals, WP24-04, WP24-05, and WP24-06**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:34 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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theo_matuskowitz@fws.gov*

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>**Sent:** Wednesday, June 21, 2023 10:41 AM**To:** Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>**Subject:** Fw: [EXTERNAL] Federal proposals, WP24-04, WP24-05, and WP24-06

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From: Wayne Hall <wayne240ak@gmail.com>**Sent:** Wednesday, June 21, 2023 9:24 AM**To:** AK Subsistence, FW7 <subsistence@fws.gov>**Subject:** [EXTERNAL] Federal proposals, WP24-04, WP24-05, and WP24-06

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Attn: Theo Matuskowitz

7/7/23, 11:34 AM

Mail - Mckinney, Kayla T - Outlook

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

WP24-06

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

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

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

I oppose all aspects of the three proposals.

Regards,

Wayne Hall

Juneau resident.

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

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:26 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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

Sent: Tuesday, June 27, 2023 1:52 PM

To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

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

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From: Brandon Ivanowicz <bivanowicz@pndengineers.com>

Sent: Monday, June 26, 2023 2:00 PM

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

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

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--

Hi Theo, I have reviewed the proposals WP24-04, WP24-05 and WP24-06 and strongly oppose them. These proposals are simply revisiting similar ones that were made in the same areas a few years ago, and which were

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

Brandon Ivanowicz

Fw: [EXTERNAL] WP24-06

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:33 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

*Theo Matuskowitz
Supervisory Regulations Specialist
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theo_matuskowitz@fws.gov*

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

Sent: Thursday, June 22, 2023 2:31 PM

To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Subject: Fw: [EXTERNAL] WP24-06

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From: jerome kristjanson <rnjk8@gci.net>

Sent: Thursday, June 22, 2023 8:48 AM

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

Subject: [EXTERNAL] WP24-06

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Subsistence Board,

I am in opposition to WP24-06 as a property owner , Lot 14 Phoneograph Creek, there are many deer in my yard, when I hike there is sign of deer(scats) in abundance. The proposed restrictions do not benefit locals or those whom have family in Juneau who have hunted in this area and know the resource is being unfairly targeted by outside interests.

Jerome A Kristjanson

PO Box 14

Pelican AK 99832

Sent from my iPhone

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

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:24 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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

Sent: Tuesday, June 27, 2023 2:01 PM

To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

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

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From: Greg Lockwood <greenhoochie@icloud.com>

Sent: Tuesday, June 27, 2023 12:29 PM

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

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

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Theo,

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

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

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

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

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

Fw: [EXTERNAL] A few concerns on WP24-04, WP24-05, WP2406**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:21 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

*Theo Matuskowitz
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theo_matuskowitz@fws.gov*

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>**Sent:** Wednesday, June 28, 2023 11:05 AM**To:** Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>**Subject:** Fw: [EXTERNAL] A few concerns on WP24-04, WP24-05, WP2406

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From: Bob MacKinnon <bob@alaskaelectricllc.com>**Sent:** Tuesday, June 27, 2023 2:17 PM**To:** AK Subsistence, FW7 <subsistence@fws.gov>**Subject:** [EXTERNAL] A few concerns on WP24-04, WP24-05, WP2406

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Hello Mr. Matuskowitz,

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

--

Bob MacKinnon

Alaska Electric

PO Box 33835

Juneau, AK 99803

(907) 988-8080

Fw: [EXTERNAL] Southeast deer proposals**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:28 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

*Theo Matuskowitz
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From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>**Sent:** Tuesday, June 27, 2023 1:42 PM**To:** Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>**Subject:** Fw: [EXTERNAL] Southeast deer proposals

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From: Charlie Martelle <martellec@yahoo.com>**Sent:** Monday, June 26, 2023 8:37 AM**To:** AK Subsistence, FW7 <subsistence@fws.gov>**Subject:** [EXTERNAL] Southeast deer proposals

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Hello,

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

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

Charlie Martelle

[Sent from Yahoo Mail for iPhone](#)

Fw: [EXTERNAL] opposition to proposals WP24-04, WP24-05, WP24-06**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:26 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>**Sent:** Tuesday, June 27, 2023 1:51 PM**To:** Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>**Subject:** Fw: [EXTERNAL] opposition to proposals WP24-04, WP24-05, WP24-06

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From: Michelle Morris <umi_4u@hotmail.com>**Sent:** Monday, June 26, 2023 12:57 PM**To:** AK Subsistence, FW7 <subsistence@fws.gov>**Subject:** [EXTERNAL] opposition to proposals WP24-04, WP24-05, WP24-06

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To Federal Subsistence Board:
Attn: Theo Matuskowitz

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

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

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

Thank you for your consideration.

Michelle Morris
Juneau resident

Fw: [EXTERNAL] proposed hunting closures**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:27 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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

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From: Richard Morris <akreeldeal@gmail.com>**Sent:** Monday, June 26, 2023 8:37 AM**To:** AK Subsistence, FW7 <subsistence@fws.gov>**Subject:** [EXTERNAL] proposed hunting closures

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Good morning,

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

WP24-04 (Southwest Admiralty)

WP24-05 (Hoonah Area / NCCUA)

WP24-06 (Pelican Area / Lisianski Inlet)

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

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

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

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

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

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

Cheers,
Rich Morris

Fw: [EXTERNAL] Deer hunting proposals**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:30 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

*Theo Matuskowitz
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theo_matuskowitz@fws.gov*

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

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

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

My family has been hunting in these areas for three decades. I totally object to the reasoning for these new proposals, the arguments are simply not valid. When we are hunting in these areas we seldom see any other people. Most of the hunting traffic we see are those that are trolling the beaches looking for an easy deer to shoot from their boats. As a long time user of these areas I oppose these proposed regulations they are unwarranted.

Mike Nizich

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

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:18 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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

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

To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

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

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From: Nicholas Orr <nicholasporr@yahoo.com>

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

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

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

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Attn: Theo Matuskowitz

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

Thanks
Nicholas Orr

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

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:26 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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

Sent: Tuesday, June 27, 2023 1:49 PM

To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

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

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From: James Parkin <jwparkin4@gmail.com>

Sent: Monday, June 26, 2023 12:49 PM

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

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

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I am a 30 year resident of Angoon.

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

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

Thank you for you time

Sent from my iPhone

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
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From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Thursday, June 29, 2023 1:19 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Attn Theo Matuskowitz

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From: Ben Pinney <benpinney@gmail.com>
Sent: Thursday, June 29, 2023 10:56 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Attn Theo Matuskowitz

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Hello, I'm writing to voice my objection to

WP24-04

WP24-05

WP24-06

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

I object to all above proposals as they are simply subjective statements not based on true data. NO hunting opportunities should be closed down without basing the decision on objective facts.

Rebuttal to specific reason #1) Juneau residents may miss deer. Do we have any data on what that percentage that actually is? Also, do we know that it is any more significant than "local hunters" one could just as easily claim that local hunters miss deer more and this make the hunting more difficult for non locals.

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

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

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

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

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

Thank you for your consideration,
Ben Pinney

Sent from my iPhone

Fw: [EXTERNAL] proposed hunting closures**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:20 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

 1 attachments (13 KB)

Alex Reid.vcf;

*Theo Matuskowitz
Supervisory Regulations Specialist
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~~Office: (907) 786-3867~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov*

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>**Sent:** Wednesday, June 28, 2023 11:59 AM**To:** Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>**Subject:** Fw: [EXTERNAL] proposed hunting closures

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

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



Fw: [EXTERNAL] Comments

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:29 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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

Sent: Tuesday, June 27, 2023 1:32 PM

To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Subject: Fw: [EXTERNAL] Comments

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From: Kaye Sullivan <ak.kayesullivan@gmail.com>

Sent: Sunday, June 25, 2023 12:40 PM

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

Subject: [EXTERNAL] Comments

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Theo Matuskowitz

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

Thank you

Catherine Sullivan

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

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:32 PM

To: McKinney, Kayla T <kayla_mckinney@fws.gov>

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

Sent: Thursday, June 22, 2023 2:35 PM

To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

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

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From: Joel Teune <joel_teune@hotmail.com>

Sent: Thursday, June 22, 2023 10:10 AM

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

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

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Theo,

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

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

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

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

Thanks for your time.

Joel Teune

Fw: [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:25 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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

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

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Mr. Matuskowitz,

I am a lifelong Juneau resident and deer hunter. I mainly hunt in Tenakee inlet and on Admiralty Island. I am writing to express opposition to proposals WP24-04, WP24-05, and WP24-06. These proposals are largely similar to proposals that have been submitted and have failed in recent years. I would urge the OSM to reject these proposals on the same grounds that the previous proposals failed. They are wholly unnecessary. Thank you for considering my comments.

Jesse Walker,
Juneau Alaska

have friends and family that live there and we hunt together every year. we harvest deer together. with no problems. There are only a few locals who hunt the places we do. it's funny how they claim there are no parking spaces. or we take up all the anchorages. a lot of them claim to be subsistence lifestyles but the fact is do you know how many hoonah residents I see at Costco, Fred's, Safeway with carts full of processed foods and tons of sodas. Sometimes it's hard to find a parking spot at these stores because of all the small towns and villages around Juneau to shop. do you know how many people I see or we see in the woods or in skiffs. during season hardly any. they're just upset because you can't just find deer on the side of the road. There are tons of healthy deer in that area if you can't find one that's on you!! I'm also curious as to who is raising all the commotion because I know a lot of people who are there. and a lot of them don't [care.it](#) seems one-sided. They want to come to Juneau for whatever they need and depend on Juneau's services. but want to keep a few hunters out for hunting season. but some of the same people had no problem with 500k people coming through and charter boat after charter boat targeting salmon and halibut by the ton. just seems one-sided. I would like to remain anonymous thank you

Fw: [EXTERNAL] Comment on WP24-05

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:33 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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

Sent: Wednesday, June 21, 2023 10:51 AM

To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Subject: Fw: [EXTERNAL] Comment on WP24-05

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From: Miakah Nix <mnix@ecotrust.org>

Sent: Wednesday, June 21, 2023 10:05 AM

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

Subject: [EXTERNAL] Comment on WP24-05

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Theo Matuskowitz,

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

Thank you for the opportunity to weigh in,
Miakah

Fw: [EXTERNAL] WP24-05 Comment**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:27 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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

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

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Theo Matuskowitz,

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

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

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

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

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

Thanks,
Mark

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

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June 30, 2023

Electronic Submission via subsistence@fws.gov

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

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

Dear Federal Subsistence Board:

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

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

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

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

Safari Club International

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

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

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

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

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

² 16 U.S.C. § 3125(3).

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

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

⁵ *Id.* at 806.

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

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

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

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

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

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

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

⁷ FSB 2023. at 816.

⁸ *Id.* at 815.

⁹ 16 U.S.C. §§ 3114, 3125(3), 3126(b).

¹⁰ 36 C.F.R. § 242.10(d)(4)(vi).

¹¹ E.g., FSB 2023 at 798.

¹² FSB 2023 at 815.

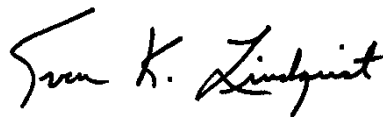
declined due to competition with NFQUs is unsupported.¹³ The proponents do not cite any concerns about public safety or administration.

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

Conclusion

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

Sincerely,

A handwritten signature in black ink, reading "Sven K. Lindquist". The signature is fluid and cursive, with the first name "Sven" and last name "Lindquist" clearly legible.

Sven Lindquist
President, Safari Club International

¹³ See SERAC Proposal, Federal Subsistence Management Program 2024-2026 Wildlife Proposals (Part I), at 17, available at <https://www.doi.gov/sites/doi.gov/files/pages-from-wildlife-proposal-book-2024-2026-part-i-wp24-01-wp24-18.pdf>.

Fw: [EXTERNAL] Public Comment on WP24-04 and WP24-05**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:20 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>

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theo_matuskowitz@fws.gov*

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>**Sent:** Wednesday, June 28, 2023 12:02 PM**To:** Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>**Subject:** Fw: [EXTERNAL] Public Comment on WP24-04 and WP24-05

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From: Chris Lunsford <clunsford1@gmail.com>**Sent:** Wednesday, June 28, 2023 11:37 AM**To:** AK Subsistence, FW7 <subsistence@fws.gov>**Subject:** [EXTERNAL] Public Comment on WP24-04 and WP24-05

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To: Federal Subsistence Board Office of Subsistence Management
From: Chris Lunsford

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

Chris Lunsford

June 29, 2023

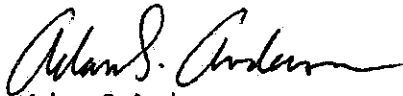
ATTN: Theo Matuskowitz,

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Adam S. Anderson". The signature is fluid and cursive, with a long, sweeping underline.

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

June, 23, 2023

TO:

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

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

FROM:

Roger Harding
1785 Mendenhall Peninsula Road
Juneau AK 99801

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

Dear Southeast Subsistence Regional Advisory Council:

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

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

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

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

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

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

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

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

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

Thank you for the opportunity to comment on these proposals.

Sincerely,

Roger Harding

To whom it may concern,

I am writing in regards to the following proposals:

Admiralty: WP24-04

Chichagof (Hoonah): WP24-05

Lisianski (Pelican): WP24-06

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

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

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

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

-Justin Dorn

Juneau, Alaska