

WRITTEN PUBLIC COMMENTS FOR WP24-06

(Apologies for the Delay)

40 Oppose

Fw: [EXTERNAL] Comments on Southeast Proposals**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:14 PM

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

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

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>**Sent:** Thursday, July 6, 2023 8:51 AM**To:** Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>**Subject:** Fw: [EXTERNAL] Comments on Southeast Proposals

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From: Ryan Beason <rlbeason14@gmail.com>**Sent:** Saturday, July 1, 2023 1:46 PM**To:** AK Subsistence, FW7 <subsistence@fws.gov>**Subject:** [EXTERNAL] Comments on Southeast Proposals

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I am opposed to the following proposals

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>

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

Sent: Tuesday, June 27, 2023 1:33 PM

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

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

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From: art dunn <adunn1848@gmail.com>

Sent: Sunday, June 25, 2023 5:25 PM

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

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

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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] 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>

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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

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

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>

*Theo Matuskowitz
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From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>**Sent:** Wednesday, June 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

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.

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>

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

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

To: Matuskowitz, 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

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

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(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>

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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>

*Theo Matuskowitz
Supervisory Regulations Specialist
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Office of Subsistence Management
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 1:51 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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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>

*Theo Matuskowitz
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theo_matuskowitz@fws.gov*

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

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

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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

Fw: [EXTERNAL] Attn Theo Matuskowitz

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:19 PM

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

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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

<https://outlook.office365.com/mail/inbox/id/AAQkADq4NGE1ZTUxLWJiNDEtNDAXYi04MihhLTkwYiA4M2JlYTkWYqAQAIrcDxul%2BUq7hZAqCGraizU...> 1/2

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>

*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 1:32 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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theo_matuskowitz@fws.gov*

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

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From: Walker, Jesse <JWalker@coeur.com>**Sent:** Tuesday, June 27, 2023 7:01 AM**To:** AK Subsistence, FW7 <subsistence@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

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

Kaleb Baird

<https://outlook.office365.com/mail/inbox/id/AAQkADg4NGE1ZTUxLWJjNDEtNDAXYi04MjhhLTkwYjA4M2JiYTkWYgAQAE7wAKwrm1OtqhzGOYUip4...> 2/2

Fw: [EXTERNAL] Attention: Federal Subsistence Board Office of Subsistence
Management (Attn: Theo Matuskowitz) 1011 E. Tudor Road, MS-121 Anchorage, Alaska
99503-6199 Email: subsistence@fws.gov Fax: (907) 786-3898

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:32 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: Friday, June 23, 2023 8:12 AM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Attention: Federal Subsistence Board Office of Subsistence Management (Attn: Theo Matuskowitz) 1011 E. Tudor Road, MS-121 Anchorage, Alaska 99503-6199 Email: subsistence@fws.gov Fax: (907) 786-3898

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: <https://www.doi.gov/subsistence>
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From: Chris Carson <bornalaska@yahoo.com>
Sent: Thursday, June 22, 2023 11:21 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Attention: Federal Subsistence Board Office of Subsistence Management (Attn: Theo Matuskowitz) 1011 E. Tudor Road, MS-121 Anchorage, Alaska 99503-6199 Email: subsistence@fws.gov Fax: (907) 786-3898

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Regarding: WP24-06 SE Deer 4 Pelican area - close to non-federally qualified users Nov. 1-15 19, to close a portion of Chichagof Island around Pelican from Nov 1-15.

I was born in Juneau in 1965. I lived in Pelican for a few years in the last 60's and currently have family still living full time in Pelican and many more living in Juneau. We have a family cabin up Lisianski Inlet from Pelican where my family spend a lot of time fishing and hunting during the summer and late into the fall.

Hunting is especially something that family members take part in as they rely very much on putting venison away for the winter. Just because you live in a larger community, doesn't mean you don't have the need for these resources. My son has three young children and with the cost of EVERYTHING, hunting is extremely important.

Now AGAIN, some local thinks the few locals who ACTUALLY hunt in Pelican, should get exclusive access to deer during the rut. Over the past four years we have witnessed less then a half dozen boats travel past our cabin to hunt during this time period.

This has nothing to do with the deer population, as it is very healthy in Lisianski Inlet. My family are very avid hunters and have hunted the ABC islands over the past 50 years and are well aware of deer populations. This simply has to do with some locals (very few) desire to hunt strictly from their boat without others scaring deer back up into the woods.

With the aging population in Pelican, approval of this proposal would limit the ability of out of town family members to successfully assist elder family living in Pelican. Hunting during the rut increases anyones chance of calling in a deer for a successful hunt. Limiting any particular American citizen from hunting on public land (fed\state) should be found unconstitutional and never allowed.

People living in Pelican are already allowed to hunt through January, if they can't shoot their 6 deer in six months, then they are not trying hard enough.

I strongly recommend this proposal be DENIED.

Thank you,

Chris L. CARSON

June 15, 2023

Norm Carson
PO Box 98
Pelican, AK 99832

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

RE: Proposal 24-6

I am adamantly opposed to this proposal. I first came to Pelican in 1966 as a college kid working at the cold storage. In the fall of 1968 I was hired by the Alaska State Troopers. Obviously, I had to depart Pelican for work reasons, but between 1966 and 2022 I deer hunted every year in the areas around Pelican described in this proposal. In the mid-80's my wife and I acquired a 3 acre parcel along Lisianski Inlet not far from Pelican. Later we would inherit my parents home in Pelican, and then later purchase another home in Pelican.

We have two sons, one recently retired from the Alaska State Troopers and another with about 7 years to go to retirement from the same agency. Both boys hunted with myself and my parents for deer in this proposal area. The oldest son resides in Juneau and has hunted out here for many years; under this proposal he would be excluded. Our younger son is about to transfer to Bethel and would also be excluded. The time frame within this proposal mirrors the time of the fall the boys joined us for a family tradition of deer hunting and a time to be together. Mid-November is also the time the Alaska Marine Highway System traditionally schedules a ferry from Juneau to Pelican.

Back in 2021 the State Board voted down a similar proposal; has anything changed to warrant a reversal? I say no; we have more deer and the # of hunters has not increased. We have a home along Lisianski Inlet and I can say we have not seen any increase in hunting pressure since 2021; we

have seen a continued healthy number of deer. I will also point out that since the 2021 proposal was voted down there has not been a local referendum on this matter. Why have the local hunters not been asked for an opinion before this proposal was brought up again?

As it stands now, the State regulations provide a substantial restriction on non-resident hunters. A non-resident is required to purchase a \$160 hunting license and buy a deer tag for each deer harvested at \$300. Add to the license/tag expense a one way airplane ticket from Juneau costs \$287.00. The presenter offered several subjective reasons for this proposal, here are a few:

- **This proposal is to establish a meaningful preference for the continuation of subsistence uses of deer. Pelican residents depend on deer and are experiencing difficulty meeting their subsistence needs— —**
 - *Their was no offering of data to support this. How many local hunters are there?*
 - *How many hunters were not harvesting deer?*
 - *How many deer does it take to meet their subsistence needs? Between August 1 and January 31st local hunters could not harvest enough deer to feed their family! Is there data to support this?*
 - *Pelican just saw the opening of a general store by year round residents; The owner is submitting the paperwork necessary to accept SNAP payment for persons of low income.*
- **Non-Federally-qualified anchor boats in small bays which inhibits access to traditional hunting areas by subsistence users.**
 - *After over 50 years of hunting in the proposal area I can not recall any boats anchored overnight in the bays. Is the presenter suggesting the boat is there for an extended number of days? I have never seen this. Is there a log book or photos to substantiate this statement? Actually I can not think of many places in the proposal area I would want to anchor over night in November.*
- **Non-Federally-qualified users may also decrease the success of subsistence users if they shoot deer and miss causing the deer to be more skittish and wary.**
 - *What may happen is not a valid reason to deny other Alaska*

residents of their right to hunt. Actually, I did find a 2 point buck about 5 years ago, dead and floating in the inlet. As it turned out, a local Pelican resident messed up and did not adequately check on the deer he shot on the beach. At that time I posted a photo of this on a community bulletin board.

- **High fuel costs, depressed economy, small boats and inclement weather also affect the ability of Pelican residents to meet their subsistence needs. They cannot afford to have many unsuccessful hunts or to travel far from their community to hunt deer because of these safety and economic concerns.**

—High fuel costs are the same for everyone whether from Juneau or Pelican. For years I hunted all of this area out of a 14' Lund; very economical with a small outboard. Us Pelican residents have the upper hand when it comes to weather; we can hunt the good days while others are still trying to get to Pelican. Weather deters Juneau based hunters from traveling to Pelican.

—“Travel far from their community”, this proposal encompasses an inlet 22 miles long and straits about another 11 miles long. Why advocate closing such a large area if the local hunters can not afford to travel very far?

—Depressed economy, there are jobs going unfilled by locals! Homes with multiple family members receive multiple PFD's. I do not characterize Pelican as a community on the edge of a food shortage.

—Safety concerns? What are they?

- **Non-Federally-qualified users exacerbate these concerns by obstructing access, competing for deer, and potentially altering deer behavior all of which decreases chances of successful subsistence hunts and hinder the continuation of subsistence uses.**

—All of this is generalized opinion. There is no data to substantiate the obstructing of access, or competing for deer; what are the ADF&G stats on this? How many Juneau residents hunted this area? “Potentially” is not justification. There is no demonstration of the hindering the continuation of subsistence uses; us locals can hunt until the end of January.

- **Subsistence hunting focuses on efficiency. The proposed two week closure window in early November is the most efficient time for subsistence deer hunting in Unit 4 for several reasons:**

—First. The deer are still fat providing the highest quality and amount of meat.

- Second.** The deer are in the rut making them more vulnerable to harvest.
- Third.** Weather conditions are favorable for proper meat care and processing.
- None of these points are justifiable reasons to exclude Alaska residents. ANILCA requires a conservation issue, not whether the species is fat, in the rut, or if the weather conditions are favorable for taking care of the meat.*
- **Deer are primarily pushed to beaches by heavy snowfalls which usually occur after the requested closure period in early November. Additionally, much of the proposed closure area is extremely steep and does not contain many beaches. Lastly, when deer are on the beaches they are usually feeding above the mean high tide line, which is under Federal jurisdiction.**
 - The area in this proposal actually contains approximately 75 miles of shoreline. There are approximately 50 beaches and small coves that invite hunting access. I have harvested numerous deer on the beach under legal means to do so.*
 - Behind State subdivided lots there is a substantial number of acres of State land. This proposal will encourage non-federally qualified substance hunters to access those acres; so along with beach hunting there will be more “skittish deer”.*

For such a serious matter as denying Juneau based hunters access to hunting in two weeks of November, this proposal is based upon opinion and hyperbole. I urge the council **not** to pass this proposal; leave State regulations for the sport season and Federal for the extended subsistence season.

Norm Carson
907-321-1950
lcarson@att.net

As a lifelong Alaskan, I appreciate the efforts made in Proposal 24-6 to establish a meaningful preference for the continuation of subsistence uses of deer. However, it is essential to ensure that any decisions regarding hunting regulations are based on sound scientific data and the advice of wildlife biologists with expertise in the area.

It is essential to maintain the sustainability of the deer population, and any restrictions on hunting should be based on accurate and reliable information to achieve the best outcome for all stakeholders, including subsistence users and non-Federally qualified users.

Therefore, I urge the Federal Subsistence Board to conduct a thorough and objective analysis of the available data on deer populations and consult with wildlife biologists before making any final decisions on the proposed regulation. This will help ensure that the interests of all stakeholders are taken into account and that the regulation is effective and sustainable in the long term.

There has yet to be a measurable impact on deer populations in the Pelican area from non-federally qualified hunters. Additionally, many of the non-Federally qualified hunters who hunt in the area surrounding Pelican are either previous Pelican residents or family members returning to Pelican to hunt with family who still reside in Pelican, as in my case.

It is worth noting that the deer populations in Unit 4 are reported to be healthy and sustainable. Therefore, any restrictions on hunting should be based on sound scientific data and the advice of wildlife biologists, ensuring that the regulation is tailored to the actual needs of the wildlife and the people who depend on it.

In conclusion, I recommend that the Federal Subsistence Board consider a balanced approach to regulating deer hunting in the proposed closure by not making any changes to the current deer hunting regulations. This will help ensure the sustainability of the deer population and maintain equitable access to this valuable resource for all users.

A handwritten signature in black ink, appearing to read "Scott Carson", with a stylized, cursive script.

Scott Carson

June 15, 2023

Steve Christensen
509-643-8488
Email: FinnFinn2018@gmail.com

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

RE: WP24-6
Lisianski Deer Restriction

I moved to Alaska in 1985 and resided in Juneau for almost 30 years. I moved to the Lower 48 for personal reasons. Five years ago I returned to Alaska and purchased a home in Pelican. I am presently employed in Pelican helping remodel a private home.

I have always been an avid hunter and fisherman; I was involved in subsistence hunting and fishing. I hunted to put food on my table in my first 30 years in Alaska.

A recent study by the Department of Fish & Game states the deer population in the area of Lisianski Inlet & Strait is not at all threatened. In years past I have experienced regulation changes by the ADF&G when they felt it necessary to protect the deer population; this is not the current situation.

WP24-6 would restrict deer hunting in the Lisianski area between November 1 and 15 to only those residents meeting the qualifications for a Rural Qualified Hunter. Only the residents of two communities in Southeast do not meet the rural standard; those would be of Juneau and Ketchikan.

In the past 5 years I have seen plenty of deer along the shores of Lisianski Inlet. All experienced hunters in Southeast understand that weather conditions and individual effort determine success or failure.

By current statistics, the deer population is flourishing and subsistence hunters are more successful now than in previous years.

I ask that WP24-6 not be passed.

Sincerely,

Steve Christensen
General Delivery
Block 1, Lot 7
Pelican AK 99832

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

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

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Wednesday, June 21, 2023 10:40 AM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] regarding WP24-06 SE Deer 4 Pelican area

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From: Sanders, Andrew - FS, AK <Andrew.Sanders@usda.gov>
Sent: Tuesday, June 20, 2023 10:46 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Cc: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>; Cross, Robert - FS, AK <robert.cross@usda.gov>
Subject: RE: [EXTERNAL] regarding WP24-06 SE Deer 4 Pelican area

Thanks for passing this on, Bernard. If Theo and Rob aren't the folks that need to get this, they will know where else to send it.

From: Shavings, Bernard <bernard_shavings@fws.gov> **On Behalf Of** AK Subsistence, FW7
Sent: Tuesday, June 20, 2023 8:23 AM
To: Sanders, Andrew - FS, AK <Andrew.Sanders@usda.gov>
Subject: Fw: [EXTERNAL] regarding WP24-06 SE Deer 4 Pelican area

Good morning Andrew, I'm forwarding this email to you. I contacted Brian Ubelaker here in Anchorage and he said that you would be able to get this where it needs to go.

Thank you,
Bernard Shavings

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
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From: denny corbin <dennycorbin.dc@gmail.com>
Sent: Friday, June 16, 2023 7:44 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] regarding WP24-06 SE Deer 4 Pelican area

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Attention: Federal Subsistence Board
Office of Subsistence Management
(Attn: Theo Matuskowitz)
1011 E. Tudor Road, MS-121
Anchorage, Alaska 99503-6199
[Email: subsistence@fws.gov](mailto:subsistence@fws.gov)
Fax: (907) 786-3898

Regarding: WP24-06 SE Deer 4 Pelican area - close to non-federally qualified users Nov. 1-15 19, to close a portion of Chichagof Island around Pelican from Nov 1-15.

Expressing my opposition to a deer hunting law that is not about deer hunting...

A short while ago I attended an event at the Pelican community hall featuring local youngsters singing and playing instruments. It was a nice event and performance. I noticed how the kids seemed enthusiastic. Not like when I was going to school in Pelican and there were always a few of the guys who were "too cool" to perform... these kids seemed happy to have the opportunity to participate. It was nice.

And then I wondered... How many of these kids will find it necessary to leave Pelican when they graduate high school (assuming they stay even that long)? There aren't really any legitimate opportunity's for work or life opportunities in Pelican anymore... Not since Pelican Cold Storage closed many years ago. The town has shrunk to a fraction of the size it was when I was a kid and barely struggles along by anyones honest assessment.

In the good old days we would bring loads of fat king salmon, halibut and black cod in to fill the freezers and ship out on the barge. There was lots of money to be made then. There were other young people around too and fun to be had... not so much now.

It struck me as sad, that these kids might hunt with their family and friends growing up here, but then find it necessary to go to a larger town to find work, or a life... and that they then would be shut out from deer hunting in the traditional place that they had hunted growing up.

That these kids would upon leaving suddenly become second class citizens in a place they regard as home, because they needed to find a way to make a living, because they found they had to leave to find opportunity, because a small town in bush Alaska just won't offer enough so that a person can support a family, buy property or save for retirement.

These kids that have to leave... If they have kids, and their parents still lived in the village, they wouldn't be able to bring their kids home to hunt with the grandparents. If they did that it would be a federal crime. So there is no way to pass down the tradition.

The federal substance laws perfectly break the bond of culture and traditions around subsistence living that rural Alaskans cherish. The Feds are good at doing that it seems. destroying communities and cultures.

This proposed law is not about the need of local people to get extra time to catch deer. They are already here year round, all that they have is time!

I will resist the urge to go into further details regarding what I think is really going on. Suffice to say, this is a bad idea that will destroy something I thought was important.

Best Regards,

Denny Corbin
Sunnyside, Alaska

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Fw: [EXTERNAL] WP24-06

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:16 PM

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

*Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
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FAX (907) 786-3898
theo_matuskowitz@fws.gov*

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

Sent: Wednesday, July 5, 2023 8:29 AM

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

Subject: Fw: [EXTERNAL] WP24-06

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
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From: Patrick malecha <patmalecha55@gmail.com>

Sent: Friday, June 30, 2023 11:25 PM

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

Subject: [EXTERNAL] WP24-06

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June 30, 2023

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

Dear Federal Subsistence Board,

I am writing this letter in strong opposition to WP24-06.

I am an Alaskan resident who has hunted in Southeast Alaska for 27 years. I currently reside in Juneau but for many years, I lived a subsistence lifestyle on Baranof Island. Over the last 15 years, I have hunted Lisianski Inlet and the surrounding areas with my friend, who is a property owner in Lisianski Inlet. Our hunting trips usually take place in November, when our work schedules allow us a short amount of free time from our jobs. As I am now a non-federally qualified user (NFQU), WP24-06 would unfairly restrict me from hunting in Lisianski Inlet, Lisianski Strait, and Stag Bay during a part of the year when I have time to hunt.

This proposal is misguided, misinformed and would unfairly exclude Alaskan residents from hunting a healthy and sustainable population of deer.

According to ADFG statistics:

- 1) Since 2013, the average number of deer harvested per year by federally qualified users (FQU) in the Lisianski area increased and the number of days required for FQU to harvest a deer decreased, i.e., efficiency increased.
- 2) The number of NFQU hunting in the Lisianski area and the number of deer harvested per year by NFQU has been stable since 1997. The number of hunting days by NFQU has decreased.
- 3) The deer population in GMU 4 is higher than anywhere else in the state. Multiple ADFG deer abundance indices (pellet survey, alpine counts, and winterkill beach mortality transects) all indicate that the deer population in Game Management Unit 4 is high and stable.

FQU hunters are harvesting more deer per hunter and are more efficient than in previous years; the number of NFQU hunters is not increasing; and there is not a deer conservation concern in the proposed area.

I strongly encourage the Federal Subsistence Board to do its due diligence and look at the facts and reject WP24-06. Without careful review of the best available data, making any decisions would be inappropriate and reactionary. If the proposal were approved, it would unnecessarily and unfairly restrict hunting opportunities for Alaskan residents who cherish the opportunity to hunt and relish its sustaining results.

Thank you for your consideration,

Patrick Malecha

Fw: [EXTERNAL] Public Comment on Proposal WP 24-6 (Jamal Moss)**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:30 PM

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

*Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
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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 1:30 PM**To:** Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>**Subject:** Fw: [EXTERNAL] Public Comment on Proposal WP 24-6 (Jamal Moss)

Office of Subsistence Management
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From: Jamal Moss <jamalmoss@gmail.com>**Sent:** Sunday, June 25, 2023 11:38 AM**To:** AK Subsistence, FW7 <subsistence@fws.gov>**Subject:** [EXTERNAL] Public Comment on Proposal WP 24-6 (Jamal Moss)

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Dear Federal Subsistence Board Office of Subsistence Management (Attn: Theo Matuskowitz)

I am writing to express my opposition to Proposal 24-6 which is proposing deer hunting closures in Lisianski Inlet and surrounding areas. Proposal 24-6 is misguided because the deer population in and around Lisianski Inlet is abundant.

I am an Alaskan who has lived here for over 20 years and owns a home in Pelican. However, I am currently living in Juneau and do not qualify for federal subsistence. As an Alaskan, I have a deep appreciation for subsistence rights and the need for food security. The ability to harvest fish and game in the area surrounding Pelican is especially important to me as I intend to make my Pelican my primary residence in 10 years.

I can personally attest to the high abundance of deer in and around Lisianski Inlet from annual observations and my harvest success since 2006. The Alaska Department of Fish and Game (ADF&G) summarized 25 years of pellet data that support a robust deer population along with declining hunter pressure. Please recognize and give substantial weight to this robust and independent data and not restrict opportunities of non-subsistence qualified hunters. ADF&G also reports that hunter success in the region is higher than anywhere else in the State. Proposal 24-6 does not qualify as a subsistence hardship. Please reject this proposal.

Sincerely,

Fw: [EXTERNAL] Comments from Mini Reink, Pelican Resident**Matuskowitz, Theo TM** <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:30 PM

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

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

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>**Sent:** Tuesday, June 27, 2023 1:26 PM**To:** Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>**Subject:** Fw: [EXTERNAL] Comments from Mini Reink, Pelican Resident

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
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From: Norm Carson <nrcarson@att.net>**Sent:** Saturday, June 24, 2023 2:13 PM**To:** AK Subsistence, FW7 <subsistence@fws.gov>**Subject:** [EXTERNAL] Comments from Mini Reink, Pelican Resident

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Federal Subsistence Board Office of Subsistence Management
Attn: Theo Matuskowitz

1011 E. Tudor Road, MS-121
Anchorage, Alaska 99503-6199

Re: Proposal 24-6

Dear Board Members:

I believe the right to hunt for Alaskans has always been honored by all the families around our area and should be left as is it. We don't need to but into something that is already working. Don't mess this up for all the local families that have hunted with their families and let us honor and respect what we do without complicating it.

Thank you,,

Mini Reink
PO Box 106
Pelican, AK 99832

907-735-2311
360-961-2540

Fw: [EXTERNAL] WP24-06

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>

Thu 7/6/2023 12:27 PM

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

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

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

Sent: Tuesday, June 27, 2023 1:46 PM

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

Subject: Fw: [EXTERNAL] WP24-06

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
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From: Mary Robidoux <maryrobidoux333@gmail.com>

Sent: Monday, June 26, 2023 9:03 AM

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

Cc: Clay Robidoux <robidoux@gmail.com>; Mary Robidoux <maryrobidoux333@gmail.com>

Subject: [EXTERNAL] WP24-06

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Attn: Theo Matuskowitz

Hello Mr. Matuskowitz - I am objecting to closing the above area to Juneau Hunters from Nov 1 - Nov 15. My family has hunted there for generations at our family's cabin. There has always and will continue to be an abundance of deer in that Pelican area. Some years, it is true that there were fewer deer present which was usually because of winterkill or an abundance of bears in the area. Those two factors alone could make for a scarcity of the deer population; not because of Juneau hunters. The reasons cited in closing the area to Juneau hunters are really ridiculous. If Juneau hunters miss their shots, maybe, they need to do more practice at a rifle range. Every one misses their intended target occasionally. Juneau hunters obstruct access by anchoring in all the best anchorages? Wouldn't it be better to be a good neighbor? I'm pretty sure that these Juneau hunters spend a few dollars in the towns which would then go away. Public safety concerns? Do these places not have a police department or a VPSO? Hoonah residents can't find a place to park to go hunting? Do these parking spaces charge a fee? There is always an economic fact to consider.

As you can see from my writing above, my family and I totally object to the present proposals to close areas around Pelican/Hoonah and Southwest Admiralty.

Thanks for your consideration.

Sincerely,

Dwight Robidoux

br2@gci.net

907-209-6017



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 24-06

Dear Federal Subsistence Board:

Safari Club International (“SCI”) submits this comment in strong opposition to Wildlife Proposal 24-06 (“WP24-06”), which would close federal public lands within the the Lisianski Inlet and Lisianski Strait area (“Lisianski Area”) in Game Management Unit 4 (“GMU 4”) to Sitka black-tailed deer hunting for non-federally qualified users (“NFQUs”) from November 1 to November 15. In February 2023, the Federal Subsistence Board (“FSB”) rejected a related proposal, which sought to reduce the bag limit for NFQUs from six deer to four deer within the Lisianski Area (“WP22-10”). WP24-06 has no more support than WP22-10, and it should be denied for the same reasons.

In denying WP22-10, the FSB acknowledged that it ran counter to the directives set out in the Alaska National Interest Lands Conservation Act of 1980 (“ANILCA”) because the FSB “may only restrict non-subsistence uses on Federal public lands if it is necessary for the conservation of healthy populations of fish and wildlife, to continue subsistence uses of such populations or for health and human safety reasons.”¹ The FSB found that the proposal did not meet the criteria for a closure or restriction to non-subsistence uses. WP24-06 suffers from the same deficiencies.

SCI fully understands and supports ANILCA’s directives that subsistence use must be prioritized, and that non-subsistence use must be limited if a conservation need exists. However, the population of Sitka black-tailed deer in this area is healthy. There is no reason for non-subsistence hunting to be restricted to protect subsistence use. Accordingly, SCI urges the FSB to reject WP24-06.

¹ See Greg Risdahl, representative from the United States Forest Service, testimony on WP22-10 at the FSB Fisheries Regulatory Meeting, available at <https://www.doi.gov/sites/doi.gov/files/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 WP24-06 were adopted. In addition, many SCI members are professional hunters and guides in Alaska, whose livelihoods will be affected by this proposed restriction. Many nonresident SCI members visit Alaska to enjoy its beautiful habitat, abundant wildlife, and unique hunting opportunities.

SCI's missions include conservation of wildlife, protection of the hunter, and education of the public concerning hunting and its use as a conservation and wildlife management tool. SCI has long been an advocate of fair and equitable access to game resources in Alaska. And while SCI supports a subsistence priority as appropriate, SCI is concerned about the lack of biological or conservation support for WP24-06.

WP24-06's proposed closure is not authorized by ANILCA.

The FSB should reject WP24-06 because it requests relief outside the subsistence priority established in ANILCA. ANILCA Section 815(3) allows the FSB to close federal lands to non-subsistence hunting in very limited circumstances. The statute provides that “[n]othing in this title shall be construed as ... authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on the public lands ... unless necessary for the conservation of healthy populations of fish and wildlife,” or “to continue subsistence uses of such populations.”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 restrictions due to perceived “competition” between user groups.³ WP24-06 makes no showing that this limited restriction standard has been satisfied.

Significantly, the deer population in GMU 4 is one of the largest in the state.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 for NFQUs would not be “necessary” to ensure the “continued viability”

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 840, available at <https://www.doi.gov/sites/doi.gov/files/book-c-1-non-consensus-agenda.pdf> (“FSB 2023”).

⁵ *Id.* at 847.

of a healthy Sitka black-tailed deer population. The proponents of WP24-06 do not even try to assert that the closure is necessary for conservation purposes.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 Game and Fish Department (“ADFG”) data, FQUs, including Pelican hunters, have seen a decrease in the number of days of hunting effort required to harvest a deer.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.

WP24-06 should be rejected because it does not comply with FSB regulations authorizing restrictions.

It is also improper to close federal public lands because WP24-06 does not satisfy the regulatory criteria that allows the FSB to restrict non-subsistence harvest. As noted above, under limited circumstances specified in Title VIII of ANILCA, the FSB is authorized to restrict, close, and reopen federal public lands to the non-subsistence hunting of wildlife.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 would not be necessary for continued subsistence use. Data show that over the last twenty years, FQUs’ effort to harvest deer have remained low while their success has increased. NFQUs’ days of effort have also declined, reducing the potential overlap of hunting days between the two groups.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 855.

⁸ *Id.* at 856.

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 840.

¹² FSB 2023 at 855.

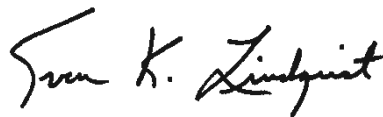
declined due to competition with NFQUs is unsupported.¹³ The proponents do not cite any concerns about public safety or administration.

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 WP24-06 because it does not meet the standards set forth in its implementing regulations.

Conclusion

SCI urges the FSB to follow their reasoning from February 2023, and to reject WP22-06. Thank you for the opportunity to comment on this important proposal. If you have any questions or need anything further, please contact Madie Demaske, SCI Litigation Associate, at litigation@safariclub.org.

Sincerely,

A handwritten signature in black ink that reads "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 20, available at <https://www.doi.gov/sites/doi.gov/files/pages-from-wildlife-proposal-book-2024-2026-part-i-wp24-01-wp24-18.pdf>.

Fw: [EXTERNAL] Opposition to 2024-2026 Wildlife Proposal WP24-06

Gould-Fehrs, Sherri L <sherri_gould-fehrs@fws.gov>

on behalf of

AK Subsistence, FW7 <subsistence@fws.gov>

Thu 6/15/2023 2:58 PM

To: Mckinney, Kayla T <kayla_mckinney@fws.gov>; Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>; Grediagin, Lisa M <Lisa_Grediagin@fws.gov>; Holman, Kendra B <kendra_holman@fws.gov>

Office of Subsistence Management

U.S. Fish and Wildlife Service - R7

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Like us on Facebook! www.facebook.com/subsistencealaska

From: Alan Steininger <al_steininger@yahoo.com>

Sent: Thursday, June 15, 2023 9:44 AM

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

Subject: [EXTERNAL] Opposition to 2024-2026 Wildlife Proposal WP24-06

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This proposal, if approved, would close deer hunting on Federal public lands draining into a large part of the Pelican area, between November 1st and November 15th, except by Federally qualified subsistence users.

The apparent reason for this proposal is not a conservation issue but a perceived notion that **only** non-federally qualified users are making it difficult for Pelican's Federally qualified subsistence users to meet their subsistence needs in one, specific, two week period. This proposal did not consider the same difficulties created by groups of Federally qualified subsistence users from outside of the Pelican area who hunt in the same area and time period. Anchoring boats in small bays and causing deer to be more skittish and wary **is not limited** to just non-federally qualified users.

With the exception of Juneau, all residents in the Northern Southeast Alaska Region are Federally qualified subsistence users. Some of the local cabins are owned by a small number of Juneau residents who hunt in the Pelican area. Through observation and without documentation, it is hard to accept that a small number of the Southeast region's non-federally qualified residents **alone** have made it difficult for Pelican residents to meet their subsistence needs by hunting during this specific two week period.

Considering that the abundance of deer in the Pelican area has been documented by the Alaska Department of Fish and Game and the unsubstantiated difficulties stated, this proposal should not be approved.

Submitted by: Al Steininger
(907)209-8508
al_steininger@yahoo.com

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 horizontal stroke at the end.

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