KODIAK/ALEUTIANS SUBSISTENCE REGIONAL ADVISORY COUNCIL MEETING MATERIALS

September 19-20, 2023

King Cove, Alaska

What's Inside

On the cover...

A Sitka black-tailed deer forages on fireweed blossoms. Introduced in 1924, deer now range throughout Kodiak Refuge

USFWS photo by Steve Hillebrand

KODIAK/ALEUTIANS SUBSISTENCE REGIONAL ADVISORY COUNCIL

King Cove Bingo Hall
King Cove
September 19-20, 2023
Convening at 9:00 am daily

TELECONFERENCE: call the toll-free number: 1-833-436-1163, then when prompted enter the Conference ID: 469480238#.

PUBLIC COMMENTS: Public comments are welcome for each agenda item and for regional concerns not included on the agenda. The Council appreciates hearing your concerns and knowledge. Please fill out a comment form to be recognized by the Council chair. Time limits may be set to provide opportunity for all to testify and keep the meeting on schedule. Written comments may also be emailed to subsistence@fws.gov.

PLEASE NOTE: These are estimated times and the agenda is subject to change. Contact staff for the current schedule. Evening sessions are at the call of the chair.

AGENDA

*Asterisk identifies action item.

1. **Invocation**
2. **Call to Order** (*Chair*)
3. **Roll Call and Establish Quorum** (*Secretary*)..... *4*
4. **Welcome and Introductions** (*Chair*)
5. **Review and Adopt Agenda*** (*Chair*) *1*
6. **Review and Approve Previous Meeting Minutes*** (*Chair*) *5*
7. **Reports**

   Council Member Reports

   Chair's Report
8. **Service Awards**
9. **Public and Tribal Comment on Non-Agenda Items** (available each morning)
10. **Old Business** (*Chair*)
    a. 805(c) Report – summary (*Council Coordinator*)
    b. Board FY2022 Annual Report Replies – summary (*Council Coordinator*)
    c. Update on proposed move of OSM to the Office of the Assistant Secretary of Indian Affairs (*presenter TBD*)
    d. Update on Adak's Lake Andrew outlet blockage (*presenter TBD*)
    e. Update on Wildlife Protection in Unalaska and Cold Bay (*presenter TBD*)

f. Update on Unalaska Salmon Issues (*presenter TBD*)

11. New Business (*Chair*)

a. Wildlife Reports – Federal
b. Wildlife Reports – State
c. Wildlife Proposals and Closure Reviews* – Proposal and closure review procedures overview (*Council Coordinator*) *16*

Regional Proposals and Closure Reviews (*OSM Wildlife/ Anthropology Staff*)

WP24-10 - Kodiak Brown Bear tag fee in Unit 8 (*Dr. Jason Roberts, OSM Anthropology*) *17*

WP24-11 - Kodiak deer harvest limit (*Kendra Holman, OSM Wildlife*) *35*

Crossover Proposals and Closure Reviews

WCR24-04 and WCR 24-06 – Review closures to caribou hunting in Unit 9C, remainder and Unit 9E, respectively. These closures target the Northern Alaska Peninsula Caribou Herd (NAPCH) (*Kendra Holman, OSM Wildlife*)..... *47*

WP24-16/17 – Include residents of Unit 9C in ANILCA Section §804 restriction for caribou in Unit 9E (crossover with BBRAC) (*Kendra Holman, OSM Wildlife*)..... *65*

Statewide Proposals

WP24-01 – Allow the sale of brown bear hides (*Dr. Jason Roberts and Pippa Kenner, OSM Anthropology*) *83*

WP24-07 – Clarification of Federal trapping regulations to all federally qualified subsistence users on Federal Lands in Municipality of Anchorage (*Kendra Holman, OSM Wildlife*)..... *107*

d. Fisheries Program Updates (*OSM Fisheries/Anthropology*) *115*
   - 2024 Fisheries Resource Monitoring Program
   - Fisheries Regulatory Cycle Update
   - Partners for Fisheries Monitoring Program
e. Identify Issues for FY2023 Annual Report* (*Council Coordinator*) *137*
f. Fall 2023 Council application/nomination open season (*Council Coordinator*)
g. Winter 2024 All-Council meeting proposed topics discussion (*Council Coordinator*)
h. Proposed land exchange involving Izembek NWR* (*Council Coordinator/Presenter TBD*)

12. Agency Reports

(Time limit of 15 minutes unless approved in advance)

Tribal Governments

- Qawalangin Tribe of Unalaska – Fisheries and Environmental Project Updates (*Rachel Lekanoff, Fisheries Manager; Mandy Salminen, Environmental Director*)

Native Organizations

Alaska Department of Fish and Game

- Division of Subsistence – FRMP Project Updates *(Chance Wilcox and Jackie Keating*) *139*
- Division of Wildlife
- Division of Commercial Fisheries

Fish and Wildlife Service

- Anchorage Fish and Wildlife Conservation Office – Summary of public fishery stakeholder's hearing June 20, Re potential in-season fisheries management actions and temporary or emergency Federal subsistence regulations for newly rescinded closures in Trout and Russell Creeks. (*Jon Gerken*)
- Alaska Maritime NWR
- Izembek NWR
- Kodiak NWR

Bureau of Land Management

Office of Subsistence Management

13. Future Meeting Dates*

Announce winter 2024 All-Council meeting dates and location *140*

Confirm fall 2024 meeting date and location..... *141*

14. Closing Comments

15. Adjourn (*Chair*)

To call into the meeting, dial the toll-free number: call the toll-free number: 1-833-436-1163, then when prompted enter the Conference ID: 469480238#.

Reasonable Accommodations
The Federal Subsistence Board is committed to providing access to this meeting for all participants. Please direct all requests for sign language interpreting services, closed captioning, or other accommodation needs to Lisa Hutchinson-Scarbrough 907-310-4097, lisa_hutchinson@fws.gov, or 800-877-8339 (TTY), by close of business on September 12, 2023.

REGION 3—Kodiak/Aleutians Regional Advisory Council

Seat	Yr. appointed *Term Expires*	Member Name & Address		Represents
1		**VACANT**		
2	2001 ***2026***	**Patrick Brian Holmes** Kodiak		Subsistence
3	2009 ***2026***	**Richard Rudolph Koso** Adak		Subsistence
4	2004 ***2026***	**Samuel Isaac Rohrer** Kodiak		Comm/Sport
5	2017 ***2023***	**Christopher Lee Price Secretary** Unalaska		Subsistence
6	2014 ***2023***	**Coral Ann Chernoff** Kodiak		Subsistence
7	2014 ***2023***	**Rebecca Louise Skinner Vice Chair** Kodiak		Comm/Sport
8	1997 ***2026***	**Della Trumble Chair** King Cove		Subsistence
9	2018 ***2026***	**Natasha M. Hayden** Kodiak		Subsistence
10		**VACANT**		

KODIAK/ALEUTIANS SUBSISTENCE REGIONAL ADVISORY COUNCIL

Meeting Minutes

Kodiak National Wildlife Refuge Visitor Center
Kodiak, Alaska
March 29-30, 2023

Invocation:

Mr. Patrick Holmes provided an invocation.

Call to Order, Roll Call, and Quorum Establishment:

The Kodiak/Aleutians Subsistence Regional Advisory Council (Council) winter 2023 meeting was called to order at 9:13 am on March 29, 2023, by Vice Chair Rebecca Skinner. Chair Della Trumble asked Vice Chair Rebecca Skinner to chair the meeting because Chair Trumble was not able to travel to the meeting to meet in person; however, she fully attended via teleconference as did member Rick Koso. Vice Chair Rebecca Skinner, Secretary Christopher Price, and Council Members Coral Chernoff, Patrick Holmes, and Sam Rohrer attended in person, and Council member Natasha Hayden was not able to attend. With seven out of eight seated Council members present (Council has two vacant seats) the quorum was established.

Attendees:

In person:

- Qawalangin Tribe of Unalaska: ***Rachel Lekanoff, Mandy Salimen***
- Koniag Regional Corporation: ***Amy Peterson***
- Bureau of Indian Affairs (BIA): Federal Subsistence Board (Board) acting member ***Dr. Glenn Chen***
- Alaska Department of Fish and Game (ADF&G): ***Bill Dunker, Mathew Keyse, Kelly Krueger, Tyler Lawson, Nate Svoboda, Amy Vandervoort, Trooper Walsh, Mark Witteveen***
- US Fish and Wildlife Service (FWS), Izembek National Wildlife Refuge (NWR): ***Alison Williams***
- FWS Kodiak NWR: ***Michael Brady, Robin Corcoran, Danielle Fujii-Doe, Danny Hernandez, Bill Pyle***
- FWS: ***Kate Martin*** (Migratory Birds)
- Office of Subsistence Management (OSM): ***Lisa Grediagin, Kendra Holman, and Lisa Hutchinson-Scarbrough, Orville Lind, Dr. Jason Roberts***

Via teleconference:

- ADF&G: ***Mark Burch, Jackie Keating, Evelyn Lichwa, Liliana Naves, Todd Rinaldi, Chance Wilcox***

- University of Alaska (UAA), Alaska Sea Grant Marine Advisory Program: ***Melissa Good***
- National Oceanic and Atmospheric Administration (NOAA): Fisheries Science Center, ***Dr. Ellen Yasumiishi;*** National Weather Service, ***Dr. Brian Brettschneider***
- United States Forest Service (USFS): Interagency Staff Committee member ***Greg Risdahl***
- FWS: ***Jill Klein*** (Interagency Staff Committee); ***Julian Fischer, Robert Kaler, Heather Renner*** (Migratory Birds), ***Dr. Paul Schuette*** (Marine Mammals)
- FWS Alaska Maritime NWR: ***Jeff Williams***
- FWS Izembek NWR: ***Maria Fosado, Laticia Melendez***
- OSM: ***Robin La Vine, Katya Wessels, Jarred Stone, Sue Detwiler***
- Department of the Interior, Assistant Secretary of Office of Indian Affairs: ***Brian Newland***

Welcome of new and reappointed Council members:

Council Coordinator Lisa Hutchinson-Scarbrough welcomed newly reappointed Council members Patrick Holmes, Rick Koso, and Samuel Rorer and thanked them for their continuing service.

Review and Adopt Agenda:

Motion by Member Holmes, seconded by Member Price, to adopt the agenda as read with the following additions:

- Discuss closure review findings from the Board
- 11i. Alaska Board of Fisheries (BOF) February meeting; discussion on findings for Proposals 98, 103 and 169
- 12.c.2 ADF&G Kodiak Area Wildlife Conservation update
- Move National Oceanic and Atmospheric Administration (NOAA) report up on agenda to accommodate presenter

The motion passed on a unanimous vote

Election of Officers:

Motion by Member Koso, seconded by Member Holmes, to nominate Della Trumble as Chair.

The motion passed on a unanimous vote.

Motion by Member Holmes to nominate Rebecca Skinner as Vice Chair.

The motion passed on a unanimous vote.

Motion by Member Rohrer to nominate Christopher Price as Secretary.

The motion passed on a unanimous vote.

Review and Approve Previous Meeting Minutes:

Motion by Member Koso, seconded by Member Chernoff, to approve their fall 2022 meeting minutes.

The motion passed on a unanimous vote.

Council Member and Chair Reports:

Coral Chernoff (Kodiak) – Member Chernoff reported that last fall she embarked on a mission to apply for and get subsistence permits and found that the process is clumsy, unclear, and a barrier to subsistence (except for the Alaska Migratory Bird Co-Management Council (AMBCC)), which she said is easy to get online. She said this creates a barrier to subsistence and agencies need to develop clear maps and processes and provide education for where people can get permits. She will be working on that with others in towns and at the agencies.

Pat Holmes (Kodiak) – Member Holmes didn't get out doing subsistence last year because of problems with his ears; however, his kids in their 40s gave him venison and goat meat, and he has a full freezer and shared meat with others. He has heard that the deer harvest is picking up. He noticed that Kodiak NWR made comments on proposed changes to state mountain goat hunts on the island. He participated in a study group with the local Fish and Game Advisory Committee (AC) on goats and worked things out so folks in villages have a registration hunt and have an advantage late in the season when goats are more available. State of Alaska Board of Game's (BOG) actions were pretty much status quo. He feels that communities try to provide benefits to local folks to harvest their food, which he said is a good thing.

Since the 2022 fall Council meeting, he did personal research on Lake Andrews communicating with Jeff Williams, Refuge Manager with the Alaska Maritime NWR, and found a stream rehabilitation person for Lake Andrews and Unalaska systems who works with FWS in Anchorage and has stream rehabilitation and grant writing experience. He was shocked that nothing had happened on Unalaska systems and found a lady in the ADF&G habitat division who located a draft of a study he had once worked on with other ADF&G folks on practical solutions to Unalaska systems. He will make sure that it gets to ADF&G for management purposes. These are things he can do without hauling deer over mountains.

Rick Koso (Adak) – Member Koso shared good and bad news. Bad news: The Aleutian School District is anticipating closing the Adak School in 2023 and 2024. Good news: he has been working with processors and the Aleut Corp to get a buyer to open the plant and hope to have a fish processor here in Adak next year. They had a meeting on caribou in March last year [2022] with Alaska Maritime NWR staff, a couple Adak City Council people, guides, and residents. There was good showing of interest from the community. There were a couple disagreements with the NWR, but that's the way it goes. He is happy the NWR provides caribou information to the community. Overall, it was a good meeting.

The population in Adak continues to decline with only 30 people currently. The only thing that might bring the community back would be a fish plant. They are having a tough time, but subsistence-wise and with salmon and halibut, there's not too much of a problem. As far as Lake Andy goes, Pat (Holmes) has been front-lining that. He is aware of contractors that would open up the river, so fish can get into the lake. But after two years, the land ownership would go to the NWR or Aleut Corporation with lots of liability because not all unexploded ordinances may be out of the beach area.

Chris Price, Secretary (Unalaska) – Member Price said he was looking forward to the meeting. Unalaska had a decent winter, not too much snow but had a couple really big storms and big rainfall events that led to emergency declarations as flooding closed roads and some infrastructure. Unalaska is working toward improving wildlife and fisheries habitat, including cleaning up contaminated sites in Unalaska Lake and looking at habitat issues with Unalaska Lake and McLees Lake and other fishery issues. The Tribe will continue to work with ADF&G on the McLees weir as long as funding can be secured. The Qawalangin Tribe sponsored their Environmental Program Director, and their Fisheries Manager to attend the Council meeting, and they will be providing reports to the Council later during this meeting.

Sam Rohrer (Kodiak) – Member Rohrer's interests are on the game side of things. Winter has been mild island wide. The deer population around the island is recovering, and last year's harvest was good for himself, his family, and others he has spoken to. He spent the prior week at the BOG meeting in Kenai; there were a few proposals our Council would be interested in, including a proposal to reduce bag limits for deer in Unit 8 for both residents and nonresidents. The BOG heard a lot of public testimony about localized high hunting pressure around villages and easy to access hunting spots. The BOG ultimately modified the proposal to reduce non-resident limits to reduce the effect of charter boats, leaving resident limits as is. Member Rohrer asked Della Trumble if she would provide a report on the King Cove road issue.

Rebecca Skinner, Vice Chair (Kodiak) – Vice Chair Skinner reported that the Kodiak AC had discussion about concerns over localized access to deer. The Kodiak AC formed a transporter working group because of concerns over licensed transporters bringing non-resident hunters to Kodiak for deer hunters and making it difficult for locals to access deer. She anticipates there will be additional meetings to discuss this and flesh out exactly where the concerns are greatest and develop solutions, perhaps through the BOG or the Board. She wants to let the public know these discussions are happening and that they're public, so if anyone wants to be on the e-mail list, let her or the AC coordinator know.

She also attended the Board meeting in January and wanted to report that all of the Council's recommendations were approved by the Board, including all the closure reviews. The Kodiak/Aleutians Region had the most closure reviews, so congrats to everyone. Lastly, something that has come up a lot (in meetings and in media) is tension between commercial and subsistence fishing. For our region, it's important to note that our communities are very dependent on both commercial and subsistence fishing. There is a subsistence priority, but when looking at trade-offs, there will be impacts when there's restrictions on commercial fishing. That tension in our region is obvious, more so than in other regions. It was obvious to her at the Board meeting.

Della Trumble, Chair (King Cove) – Chair Trumble reported that the weather in King Cove and surrounding region this winter has been horrendous with lots of big storms, wind, and rain. Bears haven't gone into hibernation and are still wandering around. There's very limited snow. State and Federal cod seasons were very short; the crab season hardly happened, one lasted four to five days in bad weather. She did attend the BOF meetings and heard the contentions with Area M. We need to continue to work

together, and education is big part. She had a call with the Department of the Interior Secretary regarding the King Cove Road and was given news the project was being pulled, but she committed to continuing to work with us. The Deputy Director and other officials were just in King Cove to discuss the road issue and figure out next steps.

Service Awards:

Dr. Glen Chen, Acting Regional Director for BIA, member of the Interagency Staff Committee, presented long-delayed five-year Service Awards to Council members Chernoff and Skinner that are now serving their eight years. In addition, Council Member Holmes was acknowledged for his 20-year service during the fall meeting, but this meeting was presented with the nicer 20-year framed service award.

Public and Tribal Comment on Non-Agenda Items:

There were no public comments presented or received either day of the meeting.

Old Business:

2023 North American Caribou Workshop & Arctic Ungulate Conference

Kendra Holman (OSM) followed up with the Council about the May 2023 North American Caribou Workshop and Arctic Ungulate Conference they discussed last fall. Chair Trumble commented that she would also like to attend the conference if possible. OSM said they would investigate options for her to attend in addition to the Council's nominee Rick Koso. Member Koso commented that he would be in Anchorage at the time and would not need airfare or lodging provided if this would allow for Chair Trumble to go. The Council provided the following feedback on the Alaska ungulate management symposium that will occur during the conference:

- Predator control is an important topic because our Council is very concerned about caribou on the peninsula and on Unimak Island. Hopefully ADF&G will present Lem Butler's study (former wildlife biologist with ADF&G) about selective predator control on calving ground
- Effects of roads on caribou distribution is another topic of concern on the Alaska Peninsula. It needs to be looked at in an academic way, not an emotional way
- The importance of surveys (4, 15); impacts of climate change (8, 21); conflicting regulations (3); and food security (20); characterizing resident herds (7); wanton waste (14); Collection of biological data; sport hunter disturbance (23); harvest reporting (24); 1, 3, 4, 6, 7, 8, 12, 14, 15, 20, 21, 23, & 24.

Update on Federal Subsistence Board's Actions and Fisheries Cycle

Dr. Jason Roberts, Anthropologist with OSM, provided a summary of the actions taken up by the Board during their January 31-February 3, 2023, fisheries regulatory meeting. Vice Chair Skinner attended the Board meeting and presented the Council's recommendations on the 14 closure reviews and 4 fishery proposals. The Board took action on all Kodiak/Aleutians fisheries proposals and closure reviews at their January 2023 fisheries regulatory meeting. He said to expect that the new regulations arising from that meeting will be published in the Federal Register in late spring or early summer. The Council may

wish to submit proposals next cycle to define harvest limits and gear types for the recently rescinded fisheriesHe added that the Board retained four salmon closures in the Unalaska region at McLees Lake drainage, Unalaska drainage, Summers and Morris Lake drainages, and the freshwaters flowing into Unalaska Bay. Dr. Roberts reminded the Council that the Council's next fisheries cycle will start at their 2024 winter meeting and the Council will need to review the Unalaska closure reviews again.

Vice Chair Skinner commented that the Council needs to do some homework between now and next fisheries cycle for the Council and with help from members of the public to figure out and recommend what kind of regulations should be in place for these areas where closure reviews were rescinded, for example should a gillnet be allowed as a gear type in a particular stream or not. She said opportunity and access for subsistence needs to be provided but also protecting the resource. Chair Trumble agreed and said she is currently working with the community of Cold Bay to determine what will best for this community.

Summary of Findings, Alaska Board of Fisheries (BOF)

Tyler Lawson, Fisheries Biologist with ADF&G, provided a brief summary of findings by the BOF at the February Alaska Peninsula, Chignik, and Aleutian Finfish meeting including findings for proposals 98 (allow subsistence fishing to occur during commercial fishing in Cold Bay region) and Board had unanimous support. Proposal 103 to reduce bag limit for sport fishing of salmon in Cold Bay Region failed, and Proposal 169 to allow for the collection of dead invasive crayfish in the Buskin River passed. Proposal 165 to allow for charter boats in Unalaska to transport people to McLees or other areas to subsistence fish, but the charter boat Captain cannot assist with any of the fishing or harvesting, passed as modified.

New Business:

Indian Affairs Briefing Regarding Office of Subsistence Management

Brian Newland, Assistant Secretary of Office of Indian Affairs, provided an hour long briefing with time included for questions regarding a proposed move of OSM from the U.S. Fish and Wildlife Service to the Office of Indian Affairs that is in the President's budget and will be considered by Congress. The Council asked several questions and voiced concerns about how this move would potentially affect the mission of the Regional Advisory Council's (Councils) and expressed frustration that the Councils were not consulted, nor were there any public hearings held in the Kodiak/Aleutian Region on this topic, prior to this plan being put into the President's budget.

Wildlife Reports

Kodiak NWR Wildlife Report –

Kodiak Refuge Manager Michael Brady provided an update. The Kodiak NWR is the issuing office for Federal subsistence permits including deer, elk, brown bear, and designated hunter. The refuge assembled a team to explain the permitting process in plain language and developed four separate hand-outs for the public: one each for elk and bear, and two for deer. The goal is to have these available at their office and on their website. They plan on doing a similar thing for fisheries permits. It's been an ongoing concern for years on who's eligible for Federal subsistence permits and understanding what the regulations are for

different species. Member Rohrer commented that he would like to have Kodiak NWR staff at BOG meetings.

ADF&G Wildlife Report –

Bill Dunker and Nate Svoboda, ADF&G Wildlife Biologists, provided a short overview of findings relevant to Kodiak at the recent BOG meeting March 17-22, 2023, for Southcentral Alaska. The BOG rejected Proposal 77 (eliminate permits when a female bear is harvested in Unit 8) because they already have the discretionary authority to implement what the proposal was asking. Member Rohrer further commented that the BOG Chair noted that the BOG has never told ADF&G to do something that contradicts their management plan. So, their expectation is that if ADF&G needs to limit brown bear permits to follow their management plan, then they will.

Unit 8 – Kodiak Deer: They reported that the deer population is believed to be stable or increasing since the last surveys were conducted. The proportion of harvest by non-resident hunters is increasing.

Unit 9D – Southern AK Peninsula Caribou Herd (SAPCH): Composition surveys were scheduled but not completed last October. Parturition and composition surveys are scheduled for this spring and fall, respectively. Population increases above objectives is a concern, especially considering the historical population crashes. The State liberalized harvest limits for SAPCH, but harvest has not been enough to curb population growth.

Unit 10 – Unimak Island Herd. The caribou population estimate is 500 caribou. This herd experiences little Federal harvest and is closed to State harvest. There's lower interest overall due to the liberal harvest limits of the SAPCH. The State is trying to avoid a crash. This herd seems to have adapted to predation by calving further up mountainsides and not in groups.

Closure Review WCR24-06 – Unit 9C and 9E Caribou

Mrs. Holman (OSM) provided an overview of the closure review process, followed by an overview of the one closure review for unit 9C and 9E and caribou, that the Council will take up during their fall meeting (KARAC only has C&T for Unit 9E – not Unit 9C, remainder). The Council asked what is preventing recovery of the Northern Alaska Peninsula Caribou herd (predation, habitat etc.). Mrs. Holman will look into it and include in the analysis for their fall meeting.

Call for Wildlife Proposals

Mrs. Holman introduced the call for Federal Wildlife Proposals and opened the floor for Council action The Council did not submit any proposals.

Council Charter Review

Ms. Hutchinson-Scarbrough provided an overview of review process for the 2021 Northwest Arctic Council Charter. The Council discussed ways to have more youth representation at Council meetings and possibly amending their charter to request a youth development seat. The Council ultimately decided to defer this discussion to a later meeting to allow members time to think about and develop this idea.

Motion by Member Rohrer, seconded by Member Holmes, to approve charter as written.

Motion passed on a unanimous vote.

Unalaska Fishery and Wildlife Enforcement Update

ADF&G biologists Lawson and Matt Keyse and State Fish and Wildlife Trooper Walsh provided an update on the lack of wildlife enforcement in Unalaska and Cold Bay during the summer salmon fisheries. The Council discussed writing a letter to State Troopers (Colonel or State commissioner) asking the Wildlife Trooper to stay in Unalaska during critical fishing periods during salmon runs in June and July because a lot of people claim to be residents who aren't really residents. However, no motion or action was ultimately taken.

Adak Island, Lake Andrew Blockage Update

Mr. Williams and Council member Holmes provided the Council with an update on the blockage. It was reported that the blockage had been opened but that a permanent solution is needed. Mr. Holmes provided some ideas how this problem could be resolved, and the Council added additional details of this concern to their annual report.

Annual Report

Ms. Hutchinson-Scarbrough provided the Council with an overview of their draft FY 2022 annual report and requested feedback on any changes that they may have. The Council modified and added language in a few topics (Fisheries Enforcement, King Cove Road, and Lake Andrews). They also added two new topics: (1) the need to work together on resources that cross regional boundaries, and (2) the proposed OSM move from the U.S. Fish and Wildlife to under Assistant Secretary of Indian Affairs.

Motion – by Member Rohrer, seconded by Member Holmes, to approve the Annual Report with amendments.

Motion passed on a unanimous vote.

Correspondence Policy

Lisa Grediagin (OSM) provided the Council with an overview of the proposed changes to the Board's Subsistence Regional Advisory Council Correspondence Policy and offered the Council an opportunity to comment. The Council initially expressed concerns over the changes under element one, but ultimately agreed with the revisions as they greatly simplified the language. The Council did request that a sentence be added under #5 that the Council Chair reviews draft correspondence before it's sent to the OSM-Assistant Regional Director for review. No other actions were recommended by the Council for the Correspondence policy.

Motion by Member Rohrer, seconded by Member Price, to add a sentence be added under #5 that the Council Chair reviews draft correspondence before it's sent to the OSM-Assistant Regional Director for review.

Motion passed on a unanimous vote.

OSM Fisheries Updates

Dr. Roberts (OSM) introduced the Fisheries Resource Monitoring Program (FRMP) update and provided a general overview of the FRMP process. He also provided a briefing that updated the Council on the Partners for Fisheries Monitoring Program. He reported that there were 15 proposals received statewide for this cycle for the Partners program, and that an review Panel met in February to determine which applicants would be funded. He said that OSM will send a news release when the proposals are awarded. Karen Hyer, Fisheries Biologist with OSM, is the primary contact person for the Partners program.

Reports:

- Dr. Ellen Yasumiishi (National Oceanic and Atmospheric Administration (NOAA), Alaska Fisheries Science Center) – provided a report on the 2022 NOAA Research and Ecosystem for Bering Sea, Aleutian Islands and Gulf of Alaska
- Dr. Brian Brettschneider (NOAA, National Weather Service) – provided a Regional Spring Climate Outlook
- Jeff Williams (Alaska Maritime NWR) – provided the Refuge activity report
- Michael Williams (Kodiak NWR) – provided the Refuge activity report
- Alison Williams (Izembek NWR) – provided the Refuge activity report including caribou survey
- Dr. Paul Schuette (USFWS, Marine Mammal Division) provided an update of sea otters and associate nearshore Ecosystems, for Kodiak Area. This included a stock assessment report, background on Southeast stakeholder working group, and a genetic research study

<u>Partners in Migratory Bird, Waterfowl and Seabird Monitoring Program Updates:</u>

- Julian Fischer (USFWS, Migratory Bird Management, Alaska Region) Brant and Emperor Goose Population Surveys, and Management Plan Revision Process
- Kate Martin (USFWS, Migratory Bird Management, Alaska Region) Atlas of Sea Duck Key Habitat Sites Identified in the Kodiak-Aleutian
- Alison Williams (Izembek NWR) gave a report on, Brant Age Ratio Survey
- Heather Renner (Alaska Maritime NWR) Gave a presentation *"Half of Alaska's Common Murres Killed in Heat Wave"*
- Robert Kaler (USFWS Migratory Bird Management), Seabird Update for KARAC region
- Robin Corcoran (Kodiak NWR) gave an update on the Kodiak Summer Marine bird and Marine Mammal Surveys

<u>State of Alaska Reports</u>

- Lilliana Naves (ADF&G Division of Subsistence) gave an overview of the 2020 Aleutian-

Kodiak Bird and Egg Harvest Survey

- Jackie Keating (ADF&G Division of Subsistence) gave an update on Subsistence research Projects for the Kodiak/ Alaska Peninsula and Aleutian Island Regions
- Kelly Krueger, Mark Witteveen (ADF&G, Division of Sport Fish) Update on the Buskin River Sockeye Salmon Stock Assessment
- Tyler Lawson and Mathew Keyse (ADF&G, Division of Commercial Fisheries) provided salmon escapement and project updates from the fall Council meeting for the Alaska Peninsula and Aleutian Islands
- Melissa Good (University of Alaska, Alaska Sea Grant Marine Advisory Program) provided an overview of the Alaska Mariculture Program

Tribal Reports

- Mandy Salimen, Environmental Program Director for Qawalangin Tribe, provided a short update on the environmental program projects including facing effects of climate change on subsistence and that they are applying for grants to clean up contamination from WW II and fishing industries in Unalaska Lake and Tribal lands
- Rachel Lekanoff, Fisheries Manager for the Qawalangin Tribe, provided a short update on the upcoming field season for summer of 2023 with ADF&G to operate the McLees Lake salmon weir and monitor the local sockeye run for subsistence uses. She said that they were awarded funds through the Partners Project for 2024 and 2025 to be able to continue that co-management relationship with ADF&G.

Future Meeting Dates:

- The Council confirmed its Fall 2023 meeting to be held September 19-20 in King Cove.
- The Council selected preferred dates for the Winter 2024 All-Council Meeting for week of March 5: first choice week of March 11 and second choice week of March 25.
- The Council selected its Fall 2024 meeting to be held September 4-6 (3-day meeting so they could visit local streams with closure reviews) in Unalaska, with Cold Bay as a backup.

Closing Comments:

The Council members thanked OSM staff for their support and to all the people that presented reports. Vice Chair Skinner thanked the members of staff and members of the public that attended and the Council member for the time that they spent preparing for and attending the meeting. Chair Trumble commented that she was happy to receive all the informative reports presented especially the migratory bird report updates that have not been heard in a few years and she felt was one of the better Council meetings she has attended. She thanked Vice Chair Skinner for chairing the meeting and other Council members and

acknowledged each of the Council's ability and willingness to work together representing the entire region and the importance of the Council to the communities in the Kodiak Aleutian Region.

Adjourn:

Vice Chair Skinner adjourned the meeting at 5:45 PM, March 30.

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Lisa Hutchinson-Scarbrough, DFO
USFWS Office of Subsistence Management

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Della Trumble, Chair
Kodiak Aleutian Subsistence Regional Advisory Council

These minutes will be formally considered by the Kodiak Aleutian Subsistence Regional Advisory Council, September 19-20, 2023, in King Cove, and any corrections or notations will be incorporated in the minutes at that meeting.

For a more detailed report of this meeting, copies of the transcript and meeting handouts are available upon request. Call Lisa Hutchinson-Scarbrough at 1-800-478-1456 or 907-310-4097, email at lisa_hutchinson@fws.gov.

Presentation Procedure for Proposals and Closure Reviews

1. **Introduction and Presentation of Draft Staff Analysis**
2. **Report on Board Consultations:**
    a. Tribes
    b. ANCSA Corporations
3. **Agency Comments:**
    a. ADF&G
    b. Federal
    c. Tribal
4. **Advisory Group Comments**:
    a. Other Regional Advisory Council(s)
    b. Fish and Game Advisory Committees
    c. Subsistence Resource Commissions
5. **Summary of Written Public Comments**
6. **Public Testimony**
7. **Regional Council Recommendation (motion to support)**
8. **Discussion/Justification**
    - Is the recommendation consistent with established fish or wildlife management principles?
    - Is the recommendation supported by substantial evidence such as biological and traditional ecological knowledge?
    - Will the recommendation be beneficial or detrimental to subsistence needs and uses?
    - If a closure is involved, is closure necessary for conservation of healthy fish or wildlife populations, or is closure necessary to ensure continued subsistence uses?
    - Discuss what other relevant factors are mentioned in OSM Draft Staff Analysis
9. **Restate final motion for the record**
10. **Council's Vote**

WP24 10 Executive Summary	
General Description	WP24-10 requests that the requirement to obtain a State locking tag be eliminated for federally qualified subsistence users hunting under a Federal registration permit for brown bears in Unit 8. *Submitted by: Koniag, Inc. and Kodiak National Wildlife Refuge*
Proposed Regulation	**Unit 8 – Unit Specific Regulations** *§___.26(n)(8)(ii)* ***You may hunt brown bear in Unit 8 with a Federal registration permit in lieu of a State locking tag if you have obtained a Federal registration permit prior to hunting.***
OSM Preliminary Conclusion	**Support** WP24-10
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**4 Support**

DRAFT STAFF ANALYSIS
WP24-10

ISSUES

WP24-10, submitted by Koniag, Inc. and Kodiak National Wildlife Refuge, requests that the requirement to obtain a State locking tag be eliminated for federally qualified subsistence users hunting under a Federal registration permit for brown bears in Unit 8.

DISCUSSION

The proponents state that the current requirement that federally qualified subsistence users (FQSUs) hunting brown bears under Federal regulations in Unit 8 obtain a State locking tag is burdensome and inconsistent with Federal regulations in surrounding Game Management Units (GMUs). The proponents note that the $25 fee for a State locking tag adds to the high cost of subsistence hunting. According to the proponent, the cost as well as the accessibility of obtaining the state locking tag has acted as a deterrent to participation in the hunt, particularly in the shorter December season. The proponents explain that because the December season is short, and the expired locking tag must be repurchased before the April to May season, some hunters forego the December season altogether if they do not already have a locking tag. Further, the proponents are concerned that this cost detracts from the ability of residents to pass on their knowledge pertaining to brown bear hunting. The proponents say that bear hunting and processing is laborious and done to share with the wider community, so obstacles to subsistence brown bear hunting should be removed. Finally, the proponents note that State locking tags are not required in some surrounding GMUs.

Existing Federal Regulation

Relationship to State procedures and regulations

§___.14(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

Unit 8 – Brown Bear

1 bear by Federal registration permit only. Up to 2 permits may be issued in Akhiok; up to 1 permit may be issued in Karluk; up to 3 permits may be issued in Larsen Bay; up to 3 permits may be issued in Old Harbor; up to 2 permits may be issued in Ouzinkie; and up to 2 permits may be issued in Port Lions. Permits will be issued by the Kodiak Refuge Manager	*Dec. 1–Dec. 15* *Apr. 1–May 15*

Proposed Federal Regulation

Unit 8 – Unit Specific Regulations

§___.26(n)(8)(ii) ***You may hunt brown bear in Unit 8 with a Federal registration permit in lieu of a State locking tag if you have obtained a Federal registration permit prior to hunting****.*

Existing State Regulation

Statewide Provisions – Licenses and Tags

5 AAC 92.012(c) A resident may not take a brown bear, except as provided in 5 AAC 92.015, or a musk ox, without possessing a numbered, nontransferable, appropriate tag, issued to that person. The person taking game shall, prior to leaving the kill site, affix the locking tag to the portion of the animal required to be salvaged from the field, and the person shall keep the tag affixed until the animal is prepared for storage, consumed, or exported.

Hunting seasons and bag limits for brown bear

5 AAC 85.020 …Unit 8, that portion of Kodiak Island and adjacent islands, including all drainages into Chiniak, Anton Larsen, and northeast Ugak (east of Saltery Creek drainage) Bays Oct. 25 - Nov. 30 (General hunt only) Oct. 25 - Nov. 30 Apr. 1 - May 15Apr. 1 - May 15 (General hunt only) 1 bear every 4 regulatory years by registration permit only

Remainder of Unit 8 Apr. 1 - May 15 (General hunt only) Oct. 25 - Nov. 30 (General hunt only) Apr. 1 - May 15 Oct. 25 - Nov. 30 1 bear every 4 regulatory years by permit only, as provided in 5 AAC 92.061

Extent of Federal Public Lands/Waters

Unit 8 is comprised of 48.58% Federal public lands and consists of 48.38% U.S. Fish and Wildlife Service (USFWS) managed lands and 0.20 % Bureau of Land Management (BLM) managed lands.

Customary and Traditional Use Determinations

Residents of Old Harbor, Akhiok, Larsen Bay, Karluk, Ouzinkie, and Port Lions have a customary and traditional use determination for brown bear in Unit 8.

Regulatory History

Following Statehood in 1959, no subsistence brown bear hunt was permitted on Kodiak Island; opportunity existed through State drawing permits (Mishler 2001). In 1996 the Federal Subsistence Board (Board) adopted proposal 96-26, recognizing the customary and traditional use of brown bear in

Unit 8 by residents of Old Harbor, Akhiok, Larsen Bay, Karluk, Ouzinkie, and Port Lions. That same year, the Board deferred proposal 96-27, which requested establishment of a Federal brown bear hunting season and harvest limit in Unit 8. Both proposals were submitted by the Kodiak/Aleutians Subsistence Regional Advisory Council.

In 1997, the Board took up deferred proposal 96-27 and adopted brown bear seasons in Unit 8 from Dec. 1-15 and Apr. 1-May 15 and established a harvest limit of one bear by Federal registration permit. Up to 11 permits were to be distributed as follows: "up to 1 permit may be issued to Akhiok, up to 1 permit may be issued to Karluk; up to 3 permits may be issued to Larsen Bay; up to 2 permits may be issued in Old Harbor; up to 2 permits may be issued in Ouzinkie; and up to 2 permits may be issued in Port Lions" (62 FR 29040).

In 2014, the Board adopted WP14-20, increasing the number of Federal subsistence brown bear permits available in Unit 8 for the communities of Akhiok and Old Harbor, so that now a total of up to 13 permits could be issued, with up to two of these going to Akhiok and up to three going to Old Harbor. The permits were to be issued by the Kodiak Refuge Manager.

In a proximal unit, Unit 9E, the Board adopted WP04-41 in 2004 with modification to remove the State locking tag requirement in that unit when a Federal registration permit is used. The Board was confident that reporting requirements would still be met through the permitting process. Because Unit 9E is adjacent to Unit 8, this history is included for context (**Table 1**). With this change to allow a Federal registration permit in lieu of a State locking tag, the Board also relaxed sealing requirements for brown bears in Unit 9E, so that sealing is now only required when a bear hide or skull is transported from Unit 9.

State Locking Tags

In addition to a hunting license, both nonresident and resident hunters must buy State locking tags for most bear hunts in Alaska, although there are exemptions, such as for State resident subsistence hunts. The locking tags help to ensure that only one bear is harvested per registration permit-holder and provide a source of revenue for the State. Use of locking tags is separate from the sealing process. **Table 1** shows that in portions of Unit 9 adjacent to Unit 8, the Board has in some cases exempted FQSUs from the State locking tag requirement.

Table 1. For Unit 8 and adjacent subunits 9C and 9E, Table 1 shows whether a State locking tag is required under State or Federal regulations, as well as where Federal registration hunts occur. This table is intended to provide context for the current Unit 8 State locking tag requirements.

	Federal registration permit?	**State locking tag required under State regulations?**	**State locking tag required under Federal regulations?**
Unit 8 Kodiak Shelikoff Area	Yes	Yes	Yes

	Federal registration permit?	**State locking tag required under State regulations?**	**State locking tag required under Federal regulations?**
Unit 9C	Yes	Yes, except for within five miles of the communities of King Salmon, Naknek, and South Naknek.	Yes
Unit 9E	Yes	In that portion of 9E with all drainages into the Pacific Ocean between Cape Kumliun and border of Unit 9E and 9D, not required for Alaska residents hunting under RB502 subsistence permit. Also not required within five miles of the communities of Egegik, Pilot Point, Ugashik, Port Heiden, Port Moller, Chignik Lake, Chignik Lagoon, Chignik Bay, Perryville, and Ivanof Bay.	No – Federal exempt
Unit 9E	Yes	Required in residual portions of Unit 9E not listed above.	No – Federal exempt

Biological Background

In 2002, the Kodiak Archipelago Bear Conservation and Management Plan (ADF&G 2002) was developed by a Citizens Advisory Committee which consisted of representatives from 12 diverse groups, including the Alaska Department of Fish and Game (ADF&G) and Kodiak National Wildlife Refuge (Kodiak NWR). The three main themes from the 270 recommendations on Kodiak bear management and conservation were continued conservation of the bear population at their current levels, increased outreach and education to teach people how to live with bears in Kodiak, protection of

bear habitat with allowances for continued human use of the Kodiak Archipelago (Van Daele and Crye 2011).

State management objectives for brown bear management in Unit 8 are (Svoboda and Crye 2023):

- Maintain a stable brown bear population that will sustain an annual harvest of 150 bears composed of at least 60% males.
- Maintain diversity in the gender and age composition of the brown bear population, with adult bears of all ages represented in the population and in the harvest.
- Limit human-caused mortality of female brown bears to a level consistent with maintaining maximum productivity.

ADF&G, with the assistance of staff from Kodiak NWR and the Alaska State Troopers conducted intensive aerial surveys in 9 study areas on Kodiak Island from 1987 to 2010 using methods developed by Barnes and Smith (1997). Seven of these areas were sampled more than once. The data was extrapolated to estimate the total population in 1995 and 2005 (Van Daele and Crye 2011). Population estimates from the survey in 1995 were 2,980 brown bears in Unit 8. By 2005, brown bear population estimates were 3,526 brown bears on in Unit 8 (Van Daele and Crye 2011). Unit 8 is now divided into six regions for intensive aerial surveys. The latest surveys were conducted in 2017-2018 and indicate a brown bear population estimate of 2,724 to 4,292 in Unit 8 (**Table 2**) (Svoboda and Crye 2023).

In addition, aerial brown bear surveys are conducted yearly since 2000 along selected streams in the southern portion of Kodiak Island to monitor trends in cub production (Van Daele and Crye 2011). To determine appropriate harvest strategies and guidelines the harvest and population data are analyzed using a population model (Van Daele and Crye 2011). Inter-annual variation in the composition of brown bears from these aerial surveys, which is considerable, may be due in part to the timing of the surveys with respect to peak periods of berry and salmon abundance. The percentage of adult females in the areas surveyed from 1985-2009 ranged from a high of 19.6% (1990-1994) to a low of 11.3% (2005, 2008-2009) (**Table 3**). Adult females are the most important segment of the population with respect to population growth (Miller 1990, Van Daele 2007).

Table 2. Estimated number of bears in each geographic unit surveyed within Unit 8 (Svoboda and Crye 2023 and Van Daele and Crye 2009).

Geographic Unit	1995 Total Bears	2005 Total bears	2017-2018 Total Bears
Afognak and Northern Islands	330	430	328-549
Northwestern Kodiak	808	908	681-1,134
Northwestern Kodiak (Road System)	90	101	78-129
Southeastern Kodiak	471	744	573-860
Southwestern Kodiak	1,019	1,094	920-1,381
Aliulik Peninsula	262	249	144-239

Geographic Unit	1995 Total Bears	2005 Total bears	2017-2018 Total Bears
Unit 8 Total	2,980	3,526	2,724-4,292

Table 3. The percentage of adult females in the areas surveyed from 1985-2009 (Svoboda and Crye 2023).

Survey years	% Females
1985-1989	15.40%
1990-1994	16.80%
1995-1999	19.60%
2000-2004	18.20%
2005, 2008-2009	11.30%

Cultural Knowledge and Traditional Practices

The original inhabitants of Kodiak Island are the Alutiiq/Sugpiaq people, whose cultural ancestors were living in the area by at approximately 7,500 years ago (Crowell et al. 2001). Historically, brown bears were one of the few large land mammals available for harvest on Kodiak Island. The archaeological record contains evidence of use of bears on the island, generally ranking below marine mammals in frequency of occurrence (Clark 1974).

Brown bears, known as *tarogaq* in Alutiiq, have historically been a source of food and raw materials. The traditional hunting seasons occurred in December and April to May, in line with the current Federal seasons (Mishler 2001). All parts of the bear were used for food except the hide, bones, claws, head, and entrails. Bear hunting is a special skill, and traditionally, bear harvests are shared, especially as they result in the harvest of a large animal with a great deal of meat and fat. Bears also had—and continue to have—symbolic importance to the indigenous inhabitants of Kodiak Island. Some oral traditions suggest analogies and relationships between bears and humans.

The social and cultural process of learning to hunt for bears is just as vital as the actual harvest. According to Mishler:

> Alutiiqs see bear hunting, however, as something just as important as bear meat. Learning and understanding bear behavior, facing the danger of bear attacks, and going out on the land are considered just as important as killing bears and eating their meat. Knowledge about bear is an integral part of the culture that is passed on from older men to young boys, and some important rituals were attached to bear hunting (2001).

Following Statehood in 1959, no subsistence brown bear hunt was permitted on Kodiak Island; opportunity existed through State drawing permits (Mishler 2001). Subsistence hunting for brown

bears on Kodiak Island did not become legal again until the Federal Subsistence Board established a hunt on Federal public lands in Unit 8 in 1997 (FB0802). According to Mishler's ethnography of Old Harbor, brown bear hunting traditions were interrupted both by lack of opportunity and by fear of violating regulations (2001). According to Sill et al., younger hunters today express the concern that the knowledge of "real bear men" and other elders who were trained to hunt bears is being lost. They say that if people are not knowledgeable about bears and bear hunting, they may become fearful and careless when they encounter one (2021).

The five communities with a customary and traditional use determination for brown bear in Unit 8 are Akhiok, Karluk, Larsen Bay, Old Harbor, Ouzinkie, and Port Lions. These are small, predominantly Alutiiq/Sugpiag communities located on the coast of Kodiak Island. **Table 4** shows population estimates for each community as of 2022. Several of these communities have experienced population decline in recent decades. For example, the population of Larsen Bay has declined from about 150 in 1990 to 28 today, and the population of Ouzinkie has declined from more than 200 in 1990 to 116; Port Lions has also experienced some decline (DCRA 2023, ADLWD 2022).

Table 4. Estimated population of communities with a customary and traditional use determination for brown bear in Unit 8, as of 2022 (ADLWD 2022).

Community	Estimated Population
Akhiok	65
Karluk	28
Larsen Bay	28
Old Harbor	200
Ouzinkie	116
Port Lions	165

Subsistence surveys conducted periodically by ADF&G, Division of Subsistence between 1982 and 2018 indicate that brown bear hunting is a more common activity in some of the five Kodiak Island communities than others (CSIS 2023). Because bear hunting tends to be a specialized activity, conducted by a small number of households (and also limited by permit availability), it is possible that the individuals hunting bears may be missed by subsistence surveys. For small communities such as those with a customary and traditional use determination for brown bear in Unit 8, ADF&G Division of Subsistence usually attempts to survey all households, but households may be left out if they are unavailable or choose to not participate (e.g. Sill et al. 2021).

Harvest data (**Table 7**) show that of the five communities with a customary and traditional use determination for brown bears in Unit 8, the most bears are harvested by Old Harbor, which is also the largest of the five communities. Subsistence surveys do not distinguish between harvest conducted under State or Federal permits.

In the most recent survey year, 2018, four out of 30 surveyed Old Harbor households harvested brown bears, or approximately 13% of households (Sill et al. 2021; **Table 5**). This accounts only for those

households surveyed; the study also estimated that a total of nine bears were harvested by the community as a whole that year (**Table 5**). In all survey years where data on sharing are available, the same number of Old Harbor households that reported harvesting brown bears also reported giving bear meat away, indicating that it is obtained for the wider community (CSIS 2023).

Table 5. Three measures of brown bear use in Old Harbor according to subsistence surveys between 1982 and 2018 (CSIS 2023).

Year	Number of Surveyed Households	Number of Surveyed Households Attempting to Harvest Brown Bears	Number of Surveyed Households Harvesting Brown Bears	Estimated Number of Brown Bears Harvested by Entire Community
1982	77	--	4	6
1986	44	2	2	5
1989	48	0	0	0
1991	42	0	0	0
1997	43	1	1	2
2003	52	2	0	0
2018	30	4	4	9

Surveyed households in Larsen Bay reported harvesting brown bears in three of ten survey years, with an average of five surveyed households attempting to harvest bears in those three years (CSIS 2023). Surveyed households in Port Lions reported harvesting brown bears in three of five survey years, with successful harvests occurring in two of those years. During those two years, one to two surveyed households harvested bears (CSIS 2023).

Hunting and use of brown bears, while present in some survey years for Akhiok and Karluk, was far less common than in Old Harbor, Port Lions, and Larsen Bay. No attempted harvest or use of brown bears was reported for any survey year by residents of Ouzinkie (CSIS 2023).

Harvest History

Brown bear hunting in Unit 8 has been conducted with State registration (RB230 and RB260) and drawing permits since at least 1989. A Federal season was first established in 1997 (FB0802). **Table 6** shows all brown bear kills in Unit 8 between 2000 and 2021. Brown bear harvests in Unit 8 increased in the early 2000s as the bear population grew, but harvest levels have stabilized since the early 2010s (Svoboda and Crye 2023). Between 1996 and 2018, the percent of males harvested annually has been greater than 68%, which exceeds the State management goal of 60% (Svoboda and Crye 2023).

Table 6. Unit 8 brown bear kills, regulatory year 2000/2001 to 2021/2022 (Svoboda and Crye 2015; Svoboda 2023, pers. comm.). Note that although legal harvest is responsible for the largest percentage

of bears killed, this table includes all take, including that due to defense of life and property or bears killed by management agencies, etc.

Regulatory Year	Male	Female	Unknown	Total
2000	126	51	5	182
2001	149	43	10	202
2002	108	43	11	162
2003	133	46	13	192
2004	145	39	15	199
2005	169	57	5	231
2006	166	64	10	240
2007	137	59	13	209
2008	182	91	13	286
2009	158	60	14	232
2010	159	79	22	260
2011	146	66	12	224
2012	142	50	14	206
2013	129	43	8	180
2014	142	47	9	198
2015	153	50	14	217
2016	148	67	7	222
2017	136	69	15	220
2018	150	62	16	228
2019	69	25	5	99
2020	172	33	0	205
2021	157	58	0	215
Total	3176	1202	231	4609
Average	145.2	54.8	10.8	210.8

Between 2000 and 2022, an average of four FB082 Federal Subsistence permits were issued for brown bears in Unit 8, with most of these permits going to just two communities, Larsen Bay and Old Harbor (OSM 2023). Since the establishment of a Federal season, Larsen Bay has been allotted up to three permits per regulatory year. Old Harbor was allotted up to two permits per regulatory year until 2014, when the Board increased this number to three.

Between 2000 and 2022, FQSUs harvested an average of 1.13 brown bears per year under Federal registration permit FB0802 in Unit 8 (OSM 2023; **Table 7)**. The community with the greatest number of Federal permit harvests over this period was Old Harbor, followed by Larsen Bay. Between 2000 and 2021, FQSUs using the FB0802 Federal registration permit accounted for about 0.5% of all brown bears taken in Unit 8 (Svoboda and Crye 2015, OSM 2023).

Table 7. The number of brown bears reported harvested under Federal subsistence permit FB0802 between 1996 and 2022, by harvesters' community of residence (OSM 2023). Years with no FB0802

harvests are not included. In years for which no harvests were made by a particular community, the corresponding cell has been left blank.

Regulatory Year	Akhiok	Karluk	Larsen Bay	Old Harbor	Port Lions	Grand Total
2000			1	2		3
2001			1	1		2
2003				1		1
2004	1		2			3
2005			2			2
2006			1	1		2
2009				1		1
2010	1					1
2011				2		2
2015			1			1
2016				1		2
2017				1		1
2018			1			1
2020				2		3
2022				1		1
Grand Total	**2**	**0**	**9**	**13**	**0**	**26**
Average	**0.09**	**0**	**0.39**	**0.57**	**0**	**1.13**

Alternatives Considered

One alternative considered would relax sealing requirements in addition to removing the locking tag requirement for FQSUs hunting under a Federal registration permit for brown bears in Unit 8. Under this scenario, sealing would only be required when a bear hide or skull is transported outside of Unit 8. Taking this action would be consistent with the Board's previous action on locking tag and sealing requirements in Unit 9E in 2004 (WP04-41; see regulatory history) and would remove an additional burden associated with subsistence hunting for brown bears in Unit 8. However, this alternative was rejected because it exceeds the scope of the proponents' request. Koniag, Inc., one of the proponents of this proposal, has emphasized that the request is to remove the locking tag fee only. The current Federal regulatory language on brown bear sealing, which applies to Unit 8, is given in the following section of this analysis.

A second alternative considered would remove the locking tag requirement for all Federal registration brown bear hunts across the State. Given that the State does not require the locking tag for any of its subsistence brown/grizzly bear hunts, removing the requirement from Federal subsistence hunts would ensure that Federal subsistence requirements are not more onerous than State subsistence requirements. However, this alternative was rejected because it exceeds the scope of this proposal, and because the implications of such an action would require further analysis on a unit-by-unit basis.

Effects of the Proposal

This proposal would remove the current State locking tag requirement and fee for FQSUs hunting brown bear on Federal public lands in Unit 8 with a Federal registration permit, eliminating an obstacle to participation in this hunt and increasing subsistence opportunity. The State locking tag and associated fee would still be required for FQSUs hunting under State regulations.

Of note, the State does not require the State locking tag fee for its subsistence brown bear hunts, such as in the RB502 subsistence registration hunt in Unit 9E; however, there is no State subsistence brown bear hunt in Unit 8.

This proposal would not change sealing requirements. The current Federal regulations on sealing are as follows:

> **Sealing of Bear Skins and Skulls**
>
> *§___.26(j) (1) Sealing requirements for brown bear taken apply in all Units, except as specified in this paragraph (j)…*
>
> *(2) You may not possess or transport from Alaska the untanned skin or skull of a bear unless the skin and skull have been sealed by an authorized representative of ADF&G in accordance with State or Federal regulations, except that the skin and skull of a brown bear taken under a registration permit in Units 5, 9B, 9E, 17, 18, 19A, and 19B downstream of and including the Aniak River drainage, and Units 21D, 22, 23, 24, and 26A need not be sealed unless removed from the area.*
>
> *(3) You must keep a bear skin and skull together until a representative of the ADF&G has removed a rudimentary premolar tooth from the skull and sealed both the skull and the skin; however, this provision does not apply to brown bears taken within Units 5, 9B, 9E, 17, 18, 19A, and 19B downstream of and including the Aniak River drainage, and Units 21D, 22, 23, 24, and 26A and which are not removed from the Unit.*
>
> *(i) In areas where sealing is required by Federal regulations, you may not possess or transport the hide of a bear that does not have the penis sheath or vaginal orifice naturally attached to indicate conclusively the sex of the bear.*

Given that the Federal subsistence share of overall brown harvest in Unit 8 is approximately 0.5%, elimination of the State locking tag is likely to have a minimal impact on tracking brown bear harvest tracking, particularly as registration permit and sealing requirements would remain in place.

OSM Preliminary Conclusion

Support Proposal WP24-10.

Justification

Removing the State locking tag requirement and fee for FQSUs hunting brown bears on Federal public lands in Unit 8 with a Federal registration permit would remove an obstacle to subsistence hunting for brown bears, increasing opportunity. Historically, regulatory obstacles have been one factor contributing to reduced participation by FQSUs in subsistence brown bear hunting on Kodiak Island, as demonstrated by ethnographic research. Given that the Federal subsistence share of all brown bears taken in Unit 8 is approximately 0.5%, elimination of the State locking tag requirement and fee is likely to have a minimal impact on tracking brown bear harvests, particularly as the Federal registration permit and sealing requirements would remain in place. The Board has already removed the locking tag requirement for FQSUs hunting brown bears with a Federal registration permit in adjacent Unit 9E.

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WRITTEN PUBLIC COMMENTS

Native Village of Afognak

To embrace, protect, develop, and enhance Alutiiq culture, protect our traditional use areas and encourage unity among the Alutiiq of the Kodiak Archipelago

March 21, 2023

Jonana "JJ" Orloff
Native Village of Afognak
115 Mill Bay Road
Kodiak, AK 99615

RE: Support for the proposed changes to the Federal Subsistence Brown Bear State Locking tag requirement

Dear Federal Subsistence Management Board:

The Koniag region encompasses the Kodiak Island area and a portion of the Alaska Peninsula. Approximately 1800 Alutiiq/Sugpiaq live on Kodiak Island. Kodiak Island includes 10 Tribes throughout the archipelago. A customary and traditional lifestyle is a daily teaching in the Alutiiq Sugpiaq culture. For over 7,500 years the Alutiiq Sugpiaq have and will continue to be the primary stewards of air, land, and sea.

As a Tribe in the Koniag region, we reach out to you today in support of the proposed changes to the Federal Subsistence Wildlife Regulations general provisions Unit 8 brown bear requirements for the state locking tags. As mentioned in the proposal change, this is an added cost to the approved permitted hunter. Additional costs defeat the purpose of customary & traditional/subsistence hunting. Currently, the customary & traditional hunt permits are underutilized in our rural communities. Let's work together to keep cultural traditions alive in our rural communities. **[Please see attached proposal]**

We appreciate your time and attention to this matter and look forward to the proposed changes being approved.

Sincerely,

JJ Orloff
Tribal Administrator

115 Mill Bay * Kodiak, AK 99615 * phone 907-486-6357 * fax 907-486-6529

ALUTIIQ TRIBE OF OLD HARBOR
PO Box 62, Old Harbor AK 99643
Phone: (907)286-2215 Fax (907)286-2350
Website: Alutiiqtribeoh.org

March 21, 2023

Stella Krumrey, Tribal Chief/President
PO Box 62
Old Harbor, AK 99643

RE: Support for the proposed changes to the Federal Subsistence Brown Bear State Locking tag requirement

Dear Federal Subsistence Management Board:
The Koniag region encompasses the Kodiak Island area and a portion of the Alaska Peninsula. Approximately 1800 Alutiiq/Sugpiaq live on Kodiak Island. Kodiak Island includes 10 Tribes throughout the archipelago. A customary and traditional lifestyle is a daily teaching in the Alutiiq Sugpiaq culture. For over 7,500 years the Alutiiq Sugpiaq have and will continue to be the primary stewards of air, land, and sea.
As a Tribe in the Koniag region, we reach out to you today in support of the proposed changes to the Federal Subsistence Wildlife Regulations general provisions Unit 8 brown bear requirements for the state locking tags. As mentioned in the proposal change, this is an added cost to the approved permitted hunter. Additional costs defeat the purpose of customary & traditional/subsistence hunting. Currently, the customary & traditional hunt permits are underutilized in our rural communities. Let's work together to keep cultural traditions alive in our rural communities. **[Please see attached proposal]**
We appreciate your time and attention to this matter and look forward to the proposed changes being approved.

Sincerely,

Stella Krumrey
Tribal Chief/President
Alutiiq Tribe of Old Harbor

"Old Harbor is a community based in rich traditions that come together to celebrate its people, culture, and heritage. We demonstrate this through our language, arts, traditional dancers and spiritual history and our respect for the Elders and honoring of our children."

NATIVE VILLAGE OF Port Lions
Traditional Tribal Council
P.O. Box 69, Port Lions, Alaska 99550
PORTLIONSTRIBE.NET

March 22, 2023

Nancy Nelson
Port Lions Traditional Tribal Council
PO Box 69
Port Lions, AK 99550

RE: Support for the proposed changes to the Federal Subsistence Brown Bear State Locking tag requirement

Dear Federal Subsistence Management Board:

The Koniag region encompasses the Kodiak Island area and a portion of the Alaska Peninsula. Approximately 1800 Alutiiq/Sugpiaq live on Kodiak Island. Kodiak Island includes 10 Tribes throughout the archipelago. A customary and traditional lifestyle is a daily teaching in the Alutiiq Sugpiaq culture. For over 7,500 years the Alutiiq Sugpiaq have and will continue to be the primary stewards of air, land, and sea.
As a Tribe in the Koniag region, we reach out to you today in support of the proposed changes to the Federal Subsistence Wildlife Regulations general provisions Unit 8 brown bear requirements for the state locking tags. As mentioned in the proposal change, this is an added cost to the approved permitted hunter. Additional costs defeat the purpose of customary & traditional/subsistence hunting. Currently, the customary & traditional hunt permits are underutilized in our rural communities. Let's work together to keep cultural traditions alive in our rural communities. **[Please see attached proposal]**
We appreciate your time and attention to this matter and look forward to the proposed changes being approved.

Sincerely,

Nancy Nelson

Nancy Nelson
Port Lions Traditional Tribal Council President
Native Village of Port Lions

March 24, 2023

Alex Cleghorn, President
Tangirnaq Native Village
3449 East Rezanof Drive
Kodiak, AK 99615

RE: Support for the proposed changes to the Federal Subsistence Brown Bear State Locking tag requirement

Dear Federal Subsistence Management Board:

The Koniag region encompasses the Kodiak Archipelago and a portion of the Alaska Peninsula. Approximately 1,800 Alutiiq/Sugpiaq reside in the Archipelago and include ten federally recognized Tribes. Throughout Sugpiaq history it is customary to share with the next generation the traditions that were followed by our ancestors. For over 7,500 years the Alutiiq/ Sugpiaq will continue to be the primary stewards of air, land, and sea.

The Tangirnaq Native Village, along with the Kodiak National Wildlife Refuge and the Koniag Regional tribes, implore you to support the proposed changes to the Federal Subsistence Wildlife Regulations general provisions Unit 8 brown bear requirements for the state locking tags. As mentioned in the proposal change, this is an added cost burden to the approved permitted hunter. Additional, requiring a cost defeats the purpose of customary and traditional/subsistence hunting. Currently, the customary & traditional hunt permits in our rural communities are underutilized. Please help us to maintain our cultural traditions in a way that is not a cost burden to the hunters and that allows for these traditions to be passed down for generations to come. **[Please see attached proposal]**

We thank you in advance for this consideration and anticipate the proposed changes are approved.

Sincerely,

Alex Cleghorn, President

3449 East Rezanof Drive · Kodiak AK 99615 · Phone (907) 486-9872 · info@woodyisland.com
www.woodyisland.com

WP24–11 Executive Summary	
General Description	Wildlife proposal, WP24-11, proposes to eliminate the antlerless deer restriction in Unit 8. *Submitted by: Kodiak National Wildlife Refuge*
Proposed Regulation	**Unit 8—Deer** *All lands within the Kodiak Archipelago within the Kodiak National Wildlife Refuge, including lands on Kodiak, Ban, Uganik, and Afognak Islands—3 deer~~; however, antlerless deer may be taking only from Oct. 1 – Jan. 31.~~* *Aug. 1 – Jan. 31*
OSM Preliminary Conclusion	**Support** Proposal WP24-11
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None

DRAFT STAFF ANALYSIS
WP24-11

ISSUES

Proposal WP24-11, submitted by Kodiak National Wildlife Refuge (NWR), requests the restriction on antlerless deer harvest in Unit 8 to be eliminated.

DISCUSSION

The proponent states that the prohibition on harvest of antlerless deer between Aug. 1-Sep. 30 unnecessarily limits deer harvest opportunity by residents of Unit 8 as there is no biological basis for this restriction. The current regulation, set in 2002, was based on anecdotal information indicating that the deer population had crashed in response to severe winters in the late 1990s. The intent of the restriction was to increase survival of antlerless deer (does, yearlings, and fawns) during the first two months of the hunting season. The restriction likely had a negligible effect on deer survival because severe winters are the primary factor that influence deer survival on the remote Federal public lands of Unit 8, and most deer hunting on those lands occurs during rut between late October and early December. Furthermore, results of Kodiak NWR surveys indicated that intensive deer use of key winter browse (e.g., red elderberry) first documented in 2017 was sustained through 2022, which suggests that the population has not decreased. In conclusion, the effect of the proposed change would be to increase harvest opportunity for rural residents with no substantive effect on deer survival or population size expected.

Existing Federal Regulation.

Unit 8—Deer

All lands within the Kodiak Archipelago within the Kodiak National Wildlife Refuge, including lands on Kodiak, Ban, Uganik, and Afognak Islands—3 deer; however, antlerless deer may be taking only from Oct. 1 – Jan. 31.	*Aug. 1 – Jan. 31*

Proposed Federal Regulation

Unit 8—Deer

All lands within the Kodiak Archipelago within the Kodiak National Wildlife Refuge, including lands on Kodiak, Ban, Uganik, and Afognak	*Aug. 1 – Jan. 31*

Islands—3 deer~~; however, antlerless deer may be taking only from Oct. 1—Jan. 31.~~

Existing State Regulation

Unit 8—Deer

Kodiak Road System Management Area (both residents and nonresidents) – One buck	*Aug. 1 – Oct. 31*
OR	
One deer by bow and arrow, crossbow, or muzzleloader only	*Nov. 1 – Nov. 14*
OR	
One deer by bow and arrow, crossbow, or muzzleloader only. Youth hunt only	*Nov. 16 – Dec. 31*
Unit 8 Remainder (residents) – Three deer total	
Bucks only	*Aug. 1 – Sep. 30*
Any deer	*Oct. 1 – Dec. 31*
Unit 8 remainder (nonresidents) – One Buck	*Aug. 1 – Dec. 31*

Extent of Federal Public Lands

Unit 8 is comprised of 49% Federal public lands and consists of 48% U.S. Fish and Wildlife Service (USFWS) managed lands and 1% Bureau of Land Management (BLM) managed lands.

Customary and Traditional Use Determinations

Residents of Unit 8 have a customary and traditional use determination for deer in Unit 8.

Regulatory History

In 2000, Federal regulations for deer in Unit 8 consisted of three hunt areas: a northeastern hunt area near the community of Kodiak, Unit 8 south of Terror and Ugak bays, and Unit 8 remainder. The season in Unit 8 south of Terror and Ugak bays and Unit 8 remainder was Aug. 1–Jan. 31 with harvest limits of 5 deer; however, antlerless deer could only be taken from Oct. 1-Jan. 31.

In 2001, the Federal Subsistence Board (Board) approved Wildlife Special Action WSA01-01, that requested to reduce the harvest limit for federally qualified subsistence users from 5 to 3 deer within Kodiak NWR, starting Aug. 1, 2001. The severe winters of 1997/98 and 1998/99 had an estimated 50% deer mortality rate, resulting in the population estimate to be 40,000 deer, which was well below the States minimum population objective of 75,530 deer (FWS 2001). Additionally in 2001, the State

simplified their Unit 8 deer regulations to include road system and non-road system hunt areas. The State also changed to a three deer harvest limit and a December 1-31 antlerless season (FSB 2001).

In 2002, the Board adopted Proposal WP02-22 to help with the recovery of the Unit 8 deer population, while continuing to provide subsistence harvest opportunities. This action reduced the codified deer harvest limit to 3 deer, simplified the hunt area descriptions, resulting in a single hunt area, and revised the antlerless season from Oct. 1-Jan. 31 to Nov. 1-Jan. 31 (FSB 2002). The deer population had not recovered from the harsh winters of 1997/98 and 1998/99 and would not be able to sustain the harvest increase back up to 5 deer per person when WSA01-01 expired (OSM 2002).

In 2006, the Board adopted Proposal WP06-21, which changed the opening date of the antlerless deer season in Unit 8 from Nov. 1 to Oct. 1 in alignment with State regulations. As the Federal season closed Jan. 31 and the State season closed Dec. 31, federally qualified subsistence users continued to have a longer deer season and maintain a subsistence priority.

Current Events Involving the Species

In March 2023, the Alaska Board of Game (BOG) adopted Proposal 73 as amended, reducing the nonresident harvest limit for deer in Unit 8 to one buck, while retaining the resident harvest limit of three deer in Unit 8, remainder. The proposal as submitted requested the Unit 8, remainder harvest limit be reduced to two deer for residents and one deer for nonresidents. In the past five years there has been a large increase in the number of non-resident hunters for deer in Unit 8. These hunters typically harvest from the beach areas, leading to declines in the populations in these areas (ADF&G 2023a). The BOG modified the Proposal 73, to address this concern with the deer population (ADF&G 2023a).

May 25, 2023, there is an additional BOG meeting scheduled to discuss a proposal delaying the implementation of the new Unit 8 deer harvest regulations, until 2024. The BOG discussed the limited time frame for this process to be completed. BOG members were concerned that not all requirements may have been discussed at the original March 2023 meeting. It was determined that all requirements were covered adequately, and the regulation would change for the RY 2023/24 season (ADF&G 2023f).

Biological Background

The Sitka black-tailed deer population originated from three transplant events, totaling 25 deer, made to Long Island and Kodiak Island between 1924 and 1934. By the early 1940s, deer occupied northeastern Kodiak Island, and the first hunt was established in 1953. The deer population continued to expand into unoccupied habitat, and by the late 1960s deer were distributed throughout Kodiak, Afognak, and adjacent islands. The population suffered high mortality during the 1968/69 and 1970/71 winters, causing declines in harvests and hunter success. An increase in the population occurred from 1972 to the mid-1980s, when the population reached peak numbers, exceeding 100,000 animals. Winter severity, beginning in the 1987/88 winter, caused a declining population trend through 1992 (Van Daele 2003).

Deer populations in Unit 8 are generally the highest on the southern one-third of Kodiak Island. Deer abundance on the island is primarily a function of winter severity at lower elevations (0–1,000'), which is the deer's typical winter range. Deer populations can decline sharply following a series of severe winters but may also recover rapidly when winter conditions are more favorable (OSM 2006).

The Unit 8 deer population began to rebound in 1993. Survival was much improved during the 1992/93 and 1993/94 winters, and the upward population trend continued through the winters of 1994/95 and 1995/96 (OSM 2022). However, the deer population suffered moderate winter kills in 1997/98, and very heavy winter mortality in 1998/99, with at least 50% of the population suspected to have perished. Mortality was significantly lower during the 1999/00 winter as the population started to recover (OSM 2002).

Prior to the winter of 1997/98, the Unit 8 deer population was estimated at 80,000–100,000. After the severe winter kills of 1998/99, the population was estimated at about 40,000 deer in the fall of 2000 for all of Unit 8, with approximately 65%–70% of the population occurring on Kodiak NWR lands. For five successive winters, from 1999/00 to 2004/05, conditions were relatively mild, and consistent with previous patterns, the deer population responded positively. Estimates of deer numbers or densities are derived from harvest data and subjective accounts from hunters, which give an indicator of population trend. The 2004 population estimate was 60,000 deer and appeared to be increasing throughout Unit 8 (Van Daele 2005).

The Alaska Department of Fish and Game (ADF&G) and the Kodiak NWR has historically conducted annual winter mortality index surveys in selected portions of Unit 8 each spring. The purpose of these surveys was to document the cyclic changes in deer numbers in response to varying winter weather. The mild winter of 2004/05 prevailed in western Kodiak Island and likely promoted high deer survival. As a result, the deer population on Kodiak NWR increased (FWS 2005).

The current management objective determined by the ADF&G for Unit 8 is to maintain a population of 70,000 to 75,000 deer and an annual harvest of 8,000 to 8,500 deer (Svoboda and Crye 2020).

Winter browse surveys from 2017-2022 by the Kodiak NWR indicate that there has not been any decrease in population. The State has not conducted any activities to estimate the deer population since at least 2011 (Svoboda and Crye 2020; ADF&G 2023a). However, the State has monitored and assessed the deer population by using other metrics such as harvest monitoring, hunter success and effort, and winter mortality surveys (Svoboda and Crye 2020).

Cultural Knowledge and Traditional Practices

Kodiak Island is the second largest island in the United States, measuring roughly 3,600 miles in area, with a current population of approximately 13,287 residents (Sill et al 2021, ADCCED 2023). Most of the population of Kodiak Island Borough is located in Kodiak City and the surrounding road connected communities (Sill et al 2021). However, there are also seven other smaller communities located off the road system, including: Aleneva on Afognak Island; Port Lions and Ouzinkie located on the northern

end of Kodiak Island; and Akhiok, Old Harbor, Larsen Bay, and Karluk located on the southern end of Kodiak Island (Sill et al 2021).

The Alutiiq/Sugpiaq people are the original inhabitants of Kodiak Island and the surrounding area, with a history of residence dating back at least 7,500 years (Sill et al 2021, Clark 1998). The traditional subsistence economies of the Alutiiq/ Sugpiaq were based on the harvest of marine and freshwater resources such as marine mammals, non-salmon fish, shellfish, sea or littoral birds and their eggs, and salmon (Sill et al 2021, Clark 1998). The current subsistence practices of the rural residents of Kodiak and Afognak Islands still reflect the cultural traditions of the Alutiiq/Sugpiaq, as well as those of Eastern European, Asian, and American settlers. Commercial fishing and processing has also been an important industry in the area since the 1800s (Sill et al. 2021). Commercial fishing and processing, tourism, the service industry, and government operations are now important economic complements to the more traditional subsistence practices that have taken place in the area for generations (USFWS 2004). The commercial fishing industry has also been particularly important to many subsistence users on Kodiak Island, as commercial harvesters often bring home or give away part of their surplus commercial catch for local subsistence use (Mishler et al. 1995).

Large land mammals have traditionally been secondary components of local subsistence economies on Kodiak and Afognak Islands, as only the Kodiak brown bear (Ursus arctos middendorffi) is native to this area (USFWS 2023). Deer, elk, and mountain goats were all introduced to the area in the early-to-mid-1900s (Sill et al 2021). Deer in particular have been increasingly integrated into the seasonal round of subsistence harvest activities by Kodiak Island communities since their introduction in 1924 (Sill et al 2021). Deer are now the most dominant and important large land mammal species utilized by Kodiak Island residents in their subsistence efforts (Svoboda and Crye 2020, Sill et al 2021). Recent comprehensive subsistence harvest surveys conducted in Kodiak Island communities by ADF&G have consistently shown the importance of deer in terms of household utilization and overall bulk contribution to subsistence diets (**Table 1**). This data conforms to findings from subsistence studies conducted in many other rural Alaskan communities, where a smaller proportion of households often harvest a greater percentage of local subsistence resources, which they typically share with other households (Wolfe and Walker 1987). Harvesting and sharing deer has been particularly important among some of the communities located off the Kodiak Island road system (**Table 1**).

Table 1. Harvest, Use, and Sharing of Deer in Kodiak Island Communities from most Recently Reported Subsistence Studies (ADF&G 2023e).

Community	Study Year	Community Population	Percent Using Deer	Percent Attempting to Harvest Deer	Precent Harvesting Deer	Percent Giving Deer	Percent Receiving Deer	Estimated Total Deer Harvested	Harvet per Household (lbs.)	Harvest per Person (lbs.)
Road Connected Communities										
Chiniak	1982	615	88%	59%	59%	n/a	n/a	688	191	48
Kodiak City	1993	6058	70%	40%	27%	24%	49%	2165	47	15
Kodiak Road	1991	4002	72%	61%	41%	21%	41%	1803	67	19
Kodiak Station	1991	611	52%	61%	45%	10%	19%	185	47	13
Off-Road Communities										
Akhiok	2018	48	91%	73%	73%	64%	46%	36	110	32
Karluk	2003	39	71%	43%	43%	14%	43%	9	25	8
Larsen Bay Old	2018	67	100%	43%	38%	52%	81%	44	64	28
Har-bor Ouzinkie	2018	203	93%	57%	57%	57%	60%	188	121	40
	2003	204	84%	43%	37%	39%	69%	78	49	16
Port Lions	2003	191	76%	46%	46%	28%	48%	146	89	33

Harvest History

Since their introduction on Kodiak Island in 1924, deer have been integrated into the seasonal round of harvest activities among local residents. Based on information collected by the ADF&G during the 1990s from nine Kodiak Island communities, the portion of households utilizing deer as a food resource ranged from 51% on the Coast Guard Base to 80% in Port Lions, 70% in Kodiak City, 88% in Chiniak, and more than 90% of the households in the remaining study communities. The average harvest of Kodiak City households was about 58 pounds (ADF&G 2001).

Annual deer harvests during the 1990s averaged between 7,000–9,000 deer, approximately half of which occurred on Kodiak NWR lands. Following the deer population decline in 1998/99, the estimated annual harvest averaged 3,065 deer for the four winters from 1999/00 through 2002/03 (Van Daele 2005).

Harvests have cycled from these lower levels to higher levers after severe winters (**Table 2**). Since 2010, there have been two severe winters and one moderately severe winter. The regulatory year following these three winters had a harvest number drop of 51-63% (**Table 2**) (ADF&G 2023c). These low harvest numbers are indicative of the heavy influence severe winter weather has on the deer population in Unit 8 (ADF&G 2023c).

Many federally qualified subsistence users prefer to wait until late in the season to hunt, when snow at higher elevations forces deer to concentrate at lower elevations and on beaches, making them easier to find, harvest, and transport by boat. Also, there are fewer non-federally qualified users, non-local hunters, later in the season. Unit 8 residents harvest average has decreased by 7% the last five years (RY2017-R2021) when compared to the previous five years (RY2012-RY2016) (**Table 3**) (ADF&G 2023c). While, non-residents and non-local resident (non-federally qualified users), combined harvest has increased to 66% over the RY2017-R2021, compared to the 60% during the previous five years (**Table 3**) (ADF&G 2023c).

Harvest of deer along the shoreline is easier for non-local State of Alaska residents and non-residents to find and transport by boat. This type of harvest has caused a source sink dynamic within the Unit 8 deer population (ADF&G 2023a). There can be conservation concerns, on a micro level, within these sink locations on the beaches; however, the remainder of the population does not have conservation concerns (ADF&G 2023a).

Over the last 10 years the ADF&G's minimum harvest objective was only reached in 2016. Harvest of Unit 8 female deer has remained under 1,000, except in 2021 (ADF&G 2023d). The large proportion of males in the harvest can be attributed to more conservative doe seasons, harvest limits, and preference of hunters.

Table 2. Total reported deer harvest from 1997-2022 in Unit 8 (ADF&G 2023b).

Unit 8		Unit 8Z	
Year	**Harvested**	**Year**	**Harvested**
1997	4,862	2010	3,276
1998	-	2011[a]	4,907
1999[a]	-	2012	2,794
2000	-	2013	3,212
2001	-	2014	4,390
2002	2,723	2015	6,078
2003	4,542	2016[a]	8,137
2004	-	2017	4,199
2005	5,766	2018	5,029
2006[a]	4,862	2019[b]	5,460
2007	2,503	2020	3,484
2008[a]	3,200	2021	4,797
2009	3,573	2022	

[a] Indicates a severe winter

[b] Indicates a moderately severe winter

Table 3. Average deer harvest by residency, split into 5-year time periods (ADF&G 2023a).

Deer Harvest by Residency - 5-year average

	RY2012-RY2016	RY2017-RY2021
Non-local Alaska Residents	43%	40%
Unit 8 Alaska Residents	39%	32%
Nonresidents	17%	28%

Effects of the Proposal

If this proposal is adopted, the Federal deer hunt in Unit 8 will provide for greater subsistence hunting opportunity. Specifically, removing the restriction on antlerless deer harvest will allow federally qualified subsistence users to harvest antlerless deer throughout the entire deer season, including August and September. Annual harvest has not reached the 8,000-8,500 deer objective in the management plan, since 2016.

The Unit 8 deer population does have a conservation concern on a more micro scale; there are concerns for the deer population along the beaches (ADF&G 2023a). However, winter browse surveys, conducted by the Kodiak NWR, indicate that the deer population has not decreased overall (Pyle pers. comm. 2023).

Winter severity is the primary driver for deer abundance in Unit 8, while hunter harvest does not appear to be a major limiting factor (ADF&G 2023c). During severe winters, the deer population is most likely to decrease; however, it then appears to recover quickly with light winters. During the past 10 years there was one severe winter (2016) and one moderately severe winter (2019). Winter browse surveys from 2017 to 2022 suggest that the deer population did not decrease during that time (Pyle pers. comm. 2023).

OSM PRELIMINARY CONCLUSION

Support Proposal WP24-11.

Justification

This proposal provides additional opportunity for deer harvest in Unit 8 by Federally qualified subsistence users. The harvest objective from the management plan has not been reached since 2016, indicating that additional harvest opportunity is available independent of sex or age of additional animals harvested. The overall deer population does not currently have a conservation concern.

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WCR24 04/06 Executive Summary	
Closure Location and Species	Unit 9C remainder, and 9E—Caribou
Current Regulation	**Unit 9−Caribou** *Unit 9C, remainder – 1 bull by Federal registration permit or State permit. Federal public lands are closed to the taking of caribou except by residents of Unit 9C and Egegik* *May be announced* *Unit 9E – 1 bull by Federal registration permit or State permit. Federal public lands are closed to the taking of caribou except by residents of Unit 9E, Nelson Lagoon, and Sand Point* *May be announced*
OSM Preliminary Conclusion	**Retain the Status Quo**
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None

FEDERAL WILDLIFE/FISHERIES CLOSURE REVIEW
WCR24-04 and WCR24-06

Issue: Wildlife Closure Reviews WCR24-04 and WCR24-06 review closures to caribou hunting in Unit 9C, remainder and Unit 9E, respectively. In Unit 9C, remainder, Federal public lands are closed to caribou hunting, except by residents of Unit 9C and Egegik. In Unit 9E, Federal public lands are closed to caribou hunting, except by residents of Unit 9E, Nelson Lagoon, and Sand Point. These closures target the Northern Alaska Peninsula Caribou Herd (NAPCH).

Closure Location and Species: Unit 9C remainder, and 9E—Caribou (**Figure 1**)

Current Federal Regulation

Unit 9−Caribou

Unit 9C, remainder – 1 bull by Federal registration permit or State permit. Federal public lands are closed to the taking of caribou except by residents of Unit 9C and Egegik	*May be announced*
Unit 9E – 1 bull by Federal registration permit or State permit. Federal public lands are closed to the taking of caribou except by residents of Unit 9E, Nelson Lagoon, and Sand Point	*May be announced*

Closure Dates: Year-round

Current State Regulation

Unit 9−Caribou

Residents: Unit 9C, south of the north bank of the Naknek River – 1 caribou by permit	*TC505*	*Aug. 10 – Oct. 10* *Nov. 1 – Feb. 28*
Residents: Unit 9E – 1 caribou by permit	*TC505*	*Aug. 10 – Oct. 10* *Nov. 1 – Apr. 30*

Regulatory Year Initiated: 1999, closed except to residents of Units 9C and 9E; 2006, closed to all users; 2016, closed except by some Federally qualified subsistence users.

Extent of Federal Public Lands/Waters

Unit 9C is comprised of 85% Federal public lands and consists of 78% National Park Service (NPS) managed lands, 4% U.S. Fish and Wildlife Service (USFWS) managed lands and 4% Bureau of Land Management (BLM) managed lands. Of note, Katmai National Park is closed to subsistence hunting.

Unit 9E is comprised of 49% Federal public lands and consists of 44% USFWS managed lands and 5% NPS managed lands (**Figure 1**).

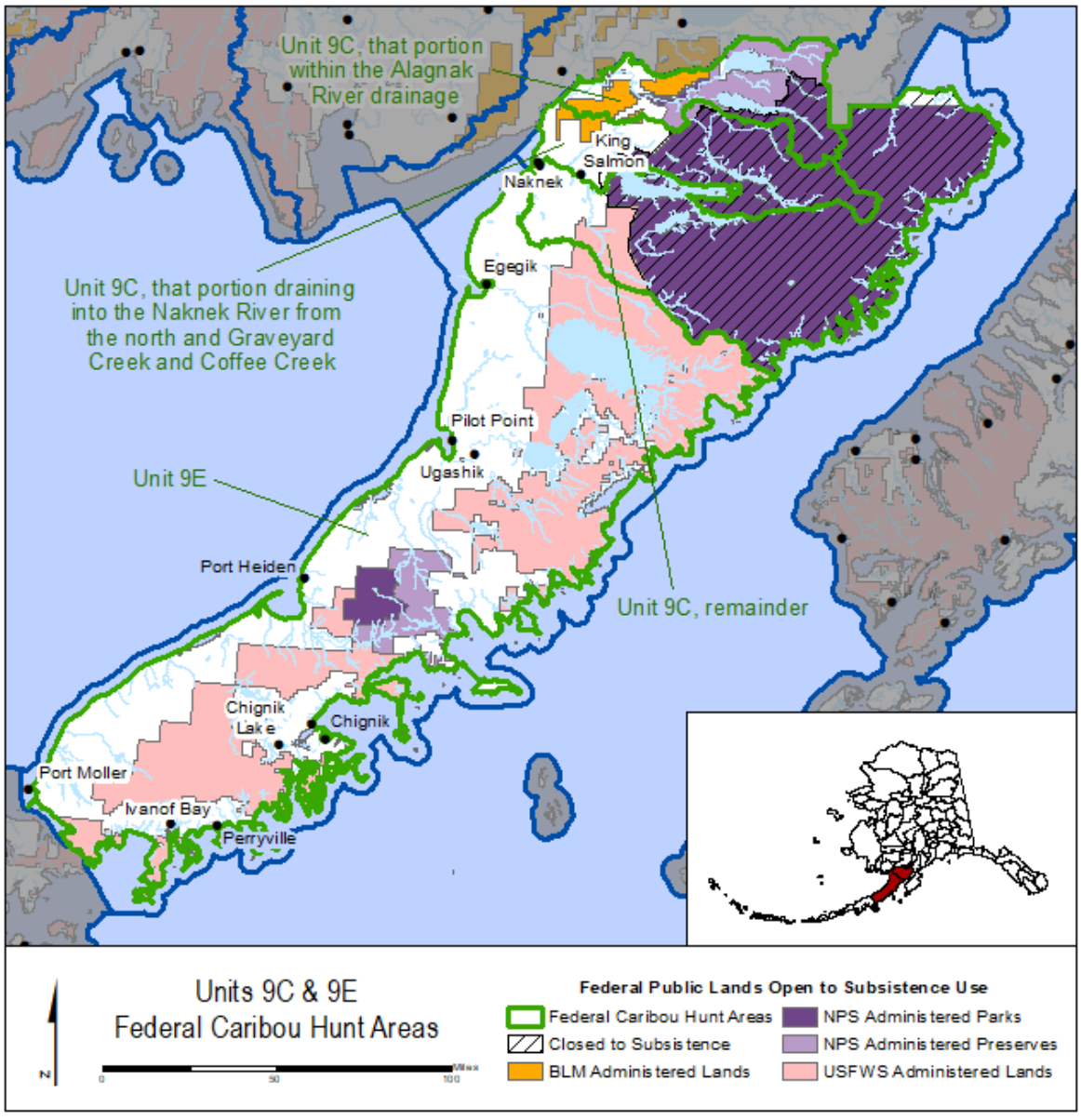

Figure 1. Units 9C and 9E Federal caribou hunt areas.

Customary and Traditional Use Determination

Residents of Units 9B, 9C, 17, and Egegik have a customary and traditional use determination for caribou in Unit 9C remainder.
Residents of Units 9B, 9C, 9E, 17, Nelson Lagoon, and Sand Point have customary and traditional use determination for caribou in Unit 9E.

Regulatory History

Prior to 1999, the harvest limit in Unit 9C remainder and Unit 9E remainder (which included most of Unit 9E) was 4 caribou. The season began on Aug. 1 in both hunt areas and ended on March 31 in Unit 9C remainder and on Apr. 30 in Unit 9E remainder. At that time, there was no Federal season in the southernmost portion of Unit 9E.

The Federal Subsistence Board's (Board) 1999 decision on three proposals resulted in the first iteration of the current closure. Collectively, WP99-32, submitted by the Bristol Bay Subsistence Regional Advisory Council (Council), WP99-33, submitted by Tim Enright of Pilot Point, and WP99-34, submitted by Chignik Lagoon Traditional Council, requested more restrictive harvest limits, more conservative seasons, and closure of some Federal public lands to the harvest of caribou in Units 9C and 9E. In response to a decline in the Northern Alaska Peninsula Caribou Herd (NAPCH), the Board adopted these proposals with modification. In addition to reduction in harvest limits and seasons, this action resulted in the closure of Federal public lands within Unit 9C remainder and all of Unit 9E to caribou harvest except by residents of Unit 9C and 9E. The Alaska Board of Game (BOG) implemented a Tier II hunt for the NAPCH the same year.

In 2000, the Board considered WP00-33, which was submitted by the Bristol Bay Native Association and requested the provision of designated hunter permits for caribou in Unit 9C and 9E. The Board approved this request because it was consistent with customary and traditional hunting practices and was not expected to impact the caribou population.

In 2004, the Board considered WP04-43, a request from the Council to allow same day airborne hunting for caribou throughout Units 9 and 17, except on NPS managed lands. All four Subsistence Regional Advisory Councils that voted on this proposal (Bristol Bay, Yukon-Kuskokwim Delta, Western Interior Alaska, Kodiak/Aleutians) opposed it, and the Board rejected the proposal.

In 2005, caribou seasons in Units 9C remainder and 9E were the subject of two special actions, both submitted by the Office of Subsistence Management (OSM). The first, Emergency Special Action WSA05-02, requested that caribou hunting on Federal lands be closed in Unit 9C remainder and Unit 9E, following the rapid decline of the NAPCH and the State's closure of the Tier II season. As authorized by the Board, this request was approved with the unanimous consent of the Interagency Staff Committee. Subsequently, Temporary Special Action WSA05-11 was submitted, a necessary step to extend the closure beyond the 60-day period approved through WSA05-02. With support of the Council, the Board adopted this request, resulting in closure of the caribou season for the entirety of the 2005-06 regulatory year.

The Council reviewed the Federal public lands closures in Units 9C remainder and 9E at their winter in 2005 meeting (WCR05-04/06). The Council concurred with OSM's recommendation, which was to maintain the status quo given continued population decline and insufficient recruitment. At the same meeting, the Council voted to submit a proposal to close Federal public lands in Units 9C remainder and 9E to the harvest of caribou by all users, effectively extending the closure that resulted from the Board's actions on WSA05-02 and WSA05-11. This proposal, WP06-22, was adopted by the Board, resulting in elimination of the Federal season for caribou in these units (BBRAC 2005). The State Tier II hunt was closed in 2005 as well.

In 2011, the Council reviewed the Federal public lands closure again (WCR10-04/06) and voted in favor of maintaining the closure (BBRAC 2011).

In 2015, the Council reviewed Wildlife Closure Review 14-04 and 15-06 (WCR14-04/06). During this meeting Alaska Department of Fish and Game (ADF&G) reported a limited Tier II hunt would occur in fall 2016, dependent on the NAPCH survey results having positive composition counts and population minimum counts (BBRAC 2015). The Council unanimously recommended to modify the closure to provide for a hunt on Federal public lands to Federally qualified subsistence users, should the State open the Tier II hunt. This resulted in Wildlife Proposal 16-21 (WP16-21).

In response to the 2014 closure review, the Council voted to submit Proposal WP16-21 to modify the conditions of the hunt. Specifically, the Council requested that the closure be modified to allow caribou harvest by residents of Units 9C and 9E. The Council also requested that a may-be-announced caribou season be established in Units 9C remainder and 9E, noting that the State was considering opening a Tier II drawing hunt. The Council believed that it would be useful for Federal managers to have the flexibility to open a hunt on Federal lands as well, particularly considering the extent of Federal land in Unit 9 (BBRAC 2015).

In 2016, the Board adopted Proposal WP16-21 was adopted by the Board at their April 2016 meeting, establishing a may-be-announced season (FC0914 and FC0915) and delegate authority to open and close the season, set quotas, any permit requirements or conditions, and harvest limit, including any sex restrictions to the Alaska Peninsula Becharof National Wildlife Refuge (NWR) manager. The Board adopted the proposal with modification to reduce the pool of eligible subsistence users on Federal public lands in Unit 9C remainder to residents of Unit 9C and Egegik, and on Federal public lands in Unit 9E to residents of Unit 9E, Nelson Lagoon, and Sand Point. The new Federal hunt coincided with 2016 changes in State regulations that opened a Tier II hunt (TC505).

In 2018, State harvest regulations for caribou in Unit 9 were again modified when the BOG acted on Proposals 125 and 127. As a result of the BOG's action on Proposal 125, the Tier II season for the NAPCH was extended throughout the TC505 permit area. In the portion of Unit 9C south of the north bank of the Naknek River, it was extended by 34 days to Aug. 10 – Oct. 10 and Nov. 1 – Feb. 28. In Unit 9E, it was extended by 20 days to Aug. 10 – Oct. 10 and Nov. 1 – Apr. 30. The BOG's action on proposal 127 resulted in the portion of Unit 9C north of the Naknek River and south of the Alagnak River drainage

becoming part of the RC503 Mulchatna Caribou Herd (MCH) permit area, with an Aug. 1 – Mar. 31 season, rather than part of the NAPCH TC505 permit area.

The Board considered a similar change in 2018. Proposal WP18-21, submitted by the Council, in part requested that the caribou season in Unit 9C north of the Naknek River be changed from a may-be-announced season to an Aug. 1 – Mar. 15 season with a harvest limit of 2 caribou. This request was consistent with requested Federal regulation changes throughout the range of the MCH and similar to the new State regulations in this hunt area. The Board adopted WP18-21 with modification to create a new hunt area, removing the portion of Unit 9C that drains into the Naknek River from the north and Graveyard Creek and Coffee Creek from Unit 9C remainder. The Board's action effectively shifted the regulatory emphasis within the new hunt area from the NAPCH to the MCH, reflecting current distribution patterns of these two herds.

In August 2020, the Board approved a revised closure policy, which stipulated all closures will be reviewed every four years. The policy also specified that closures, similar to regulatory proposals, will be presented to the Councils for a recommendation and then to the Board for a final decision. Previously, closure reviews were only presented to Councils who then decided whether to maintain the closure or to submit a regulatory proposal to modify or eliminate the closure.

In 2020, the Board reviewed the closure in Unit 9C, draining into the Naknek River from the north and Graveyard Creek and Coffee Creek; Unit 9C, remainder; and Unit 9E. The Board retained the closures within Units 9C remainder and 9E because the NAPCH continued to have a low population count and insufficient recruitment. The closure in Unit 9C, draining into the Naknek River from the north and Graveyard Creek and Coffee Creek was rescinded, as the NAPCH no longer range within this area.

Closure last reviewed: 2020 – WCR20-04/06

Justification for Original Closure:

§815(3) of ANILCA states:

> *Nothing in this title shall be construed as –) authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on public lands other than national parks and monuments) unless necessary for the conservation of healthy populations of fish and wildlife, for the reasons set forth in section 6, to continue subsistence uses of such populations, or pursuant to other applicable law*

The original closure, in 1999, was initiated at a time when the NAPCH population was declining and there was a need to ensure subsistence opportunity for local users. By 2006, when Federal public lands were closed to all users, the caribou population had declined to a point that any harvest was unsustainable. In 2016, the state opened a Tier II system, and the Board adopted a may-be-announced season dependent on having positive composition counts and population minimum counts.

Council Recommendation for Original Closure:

The Council's actions in 1999 addressed both conservation concerns and the need to provide continued subsistence opportunity for local communities. Specifically, the Council supported more restrictive harvest limits and seasons due to the declining caribou population size. They also supported closing Federal public lands in Units 9C remainder and 9E to caribou harvest except by residents of Unit 9C and 9E. The Council believed it was reasonable to limit distribution of Federal permits to these users, considering who has a customary and direct dependence on the resource, who is in closest proximity to the resource, and who has access to alternative resources.

In 2006, noting that recruitment was insufficient to offset adult mortality, the Council agreed that closing Federal public lands to all users was an appropriate compliment to the State's decision to close the State Tier II season.

In 2016, the Council supported Proposal WP16-21, which closed Units 9C remainder and 9E, except by some Federally qualified subsistence users s, established a may-be-announced season, a cultural and traditional use determination for the NAPCH in Unit 9C and 9E, and delegated authority to Alaska Peninsula Becharof NWR manager to manage the hunt.

State Recommendation for Original Closure:

In 1999, the State supported efforts to improve herd productivity by restricting harvest limits, reducing the season and limiting harvest through the use of quotas. In 2006, acknowledging the serious conservation concern, the State stopped issuing Tier II permits and supported closing the Federal caribou season. In 2016, the State opened a Tier II system, dependent on having positive composition counts and population minimum counts.

Biological Background

Generally speaking, the NAPCH occupies Units 9C and 9E, from the Naknek River in the north to Port Moller in the south. It has varied considerably in size in the last century, ranging from approximately 2,000 during population lows to approximately 20,000 during population highs. These fluctuations in population size have been accompanied by shifts in distribution and movement patterns, likely due to impacts of population size on habitat quality. Following the most recent population peak in the mid-1980s, the herd began wintering north of the Naknek River. More recently, this northern range has become less important, with few caribou crossing to the north side of the Naknek River by 2000 (Crowley 2015).

The NAPCH experienced a steady multi-decade decline in population size between the mid-1980s and the mid-2010s, approximating historical lows of 2,000 caribou. Nutritional limitations have been implicated in the decline. In recent years, the population has showed a positive growth trend and was estimated to be approximately 3,800 caribou in 2018 (**Table 1**) but remains well below the State's population objective of 12,000 – 15,000 caribou (Crowley 2014, 2015, 2016, 2019, pers. comm.).

Calf-cow ratios have improved markedly from the single digit ratios of the mid-2000s. At last count, in 2018, there were 35 calves:100 cows. Bull:cow ratios have also improved in the last decade. The two most

recent surveys, prior to 2018, estimated at least 70 bulls:100 cows (**Table 1**). Regardless, the bull:cow ratios have shown an increasing trend and local biologists believe that the current bull:cow ratio exceeds the management objective of 35 bulls:100 cows (Crowley 2014, 2016, 2018 pers. comm.).

Table 1. Northern Alaska Peninsula Caribou Herd composition counts and population estimates, 1984 – 2018 (Crowley 2014, 2016, 2019, pers. comm. and Reiley 2021, pers. Comm).

	Bulls:	Calves:	% of Total bulls				
Year	100 cows	100 cows	Small bulls	Medium bulls	Large bulls	Composition sample size	Population Estimate
1984	39	39	67	16	17	1,087	20,000
1990	41	29	-	-	-	1,484	17,000
1991	42	47	54	34	12	1,639	17,000
1992	40	44	44	38	19	2,766	17,500
1993	44	39	52	29	19	3,021	16,000
1994	34	34	58	28	14	1,857	12,500
1995	41	24	49	29	22	2,907	12,000
1996	48	38	71	19	10	2,572	12,000
1997	47	27	54	31	14	1,064	10,000
1998	31	30	57	28	15	1,342	9,200
1999	40	21	58	30	12	2,567	8,600
2000	38	18	59	24	18	1,083	7,200
2001	49	28	61	24	15	2,392	6,300
2002	46	24	57	19	24	1,007	6,600
2003	36	11	46	30	24	2,776	-
2004	34	7	40	34	25	1,355	-
2005	23	7	37	41	22	1,914	-
2006	26	14	26	43	31	1,725	-
2007	27	7	29	38	33	1,719	-
2008	19	10	33	25	43	1,841	-
2009	19	16	30	35	35	2,126	-
2010	25	18	30	31	39	1,795	2,169[a]
2011	26	20	26	37	37	2,395	2,321[a]
2012	28	22	24	37	40	1,352	2,525[a]
2013	31	21	26	41	33	2,076	2,708[a]
2014	40	34	23	50	28	2,295	3,101[a]
2015[b]	38	29	53	29	18	2,122	3,411[a]
2016	70[c]	24	30	47	23	1,556	3,617[a]
2017	-	-	-	-	-	-	-
2018	72[c]	35	29	42	29	1,327	3,800 [a]

[a]Estimate based on simulation modeling.

[b]Survey limited to northern portion of NAP range.

[c]Likely biased high due to inability to locate entire herd

Cultural Knowledge and Traditional Practices

There are 33 communities with an estimated total population of over 7,500 people included in the customary and traditional use determination for caribou in Units 9C remainder and 9E. However, only 14 of these communities have been eligible to harvest caribou on Federal public lands since 2015, based on the three criteria in ANILCA Section 804: (1) reliance on the resource as the mainstay of livelihood, (2) proximity to the resource, and (3) availability of other resources (see Proposal WP16-22 described above in **Regulatory History**). Eligible communities in the Unit 9C remainder hunt area are King Salmon, Naknek, South Naknek, and Egegik; and in the Unit 9E hunt area are Chignik Bay, Chignik Lagoon, Chignik Lake, Egegik, Perryville, Ivanof Bay, Pilot Point, Port Heiden, Ugashik, Nelson Lagoon, and Sand Point (**Figure 1**). The population of these communities is estimated at almost 2,000 people based on the 2020 U.S. Census and has declined since the 1990s (**Table 2**, ADCCED 2022).

Caribou were among the most important subsistence resource for Northern Alaska Peninsula communities (Fall 1993). The herd last peaked in about 1984, and harvest seasons were closed from 2005 through 2015. Residents of eligible communities have reported their harvests on household surveys since 1983. Residents' overall harvest of caribou and per person harvest in pounds edible weight have generally decreased by community since 1983 (ADF&G 2022, **Appendix 1**). Because of the lack of commercial vendors selling hunting licenses and the remoteness of many of the communities, reported harvest and periodic household subsistence surveys have been used in conjunction to produce more accurate estimates of community harvest.

The most recent household harvest surveys were conducted in 2014, 2016, and 2018. Residents of Egegik, Pilot Point, and Ugashik participated in harvest surveys in 2014 before the hunting season opened in 2016 (Sill et al. 2022). Residents commented on their preference for caribou, "Many respondents, particularly elders, commented that though salmon was a very important food source, caribou remained their preferred wild resource even though many had not had any in more than two decades. There were residents who longed for caribou to return to their region so they could once again acquire them to feed their families" (Sill et al. 2022:247).

Some expressed fear that people would lose the ability to hunt and process caribou with legal hunts being closed for so long. An Ugashik resident made this comment during they survey, "I worry that the younger generation will not have anyone to teach them how to hunt if caribou return." Others spoke of how much they missed eating caribou, for example from Pilot Point, "I have not had one piece of caribou in so long I can't remember, but I can still taste it" (Sill et al. 2022:247).

Some harvesting opportunity has been provided since 2015. The results of harvest surveys conducted since 2015 are described in **Table 3**. In the 1980s and 1990s, the annual caribou harvest for Pacific drainage communities in Unit 9E were generally lower than those of the Bristol Bay side—which includes Port Heiden and Egegik—because of more limited access to caribou (Fall 1993).

In 2018, Port Heiden community members commented on their experiences hunting caribou since 2015 after the long closure and reduced herd size. Jones and Cunningham (2020) described these comments,

> Reestablishing caribou hunting also regenerated important learning, sharing, and trading networks within the community and with other communities. Port Heiden residents explained that enough people are still around and available to help bestow their caribou hunting and processing wisdom upon the younger generation whose members had yet to experience caribou hunting due to the regulatory closure. Regarding the transmission of caribou hunting knowledge, one key respondent explained: '. . . . Tier II caribou hunts closed, and hunting was a lost art. They [Port Heiden youth] didn't know how to hunt, where to go, how to process. We're lucky that hunt came back, and we were able to get the young people involved' (Jones and Cunningham 2020:100).

Jones and Cunningham (2020) described changes in hunting patterns in 2018 compared to in the 1980s and 1990s, "According to elders and expert caribou hunters from Port Heiden, in the past, frozen rivers provided access to caribou hunting areas throughout the Alaska Peninsula. However, since the Tier II permit hunt opened in 2016, many of the rivers that hunters traditionally used for winter travel have not frozen adequately enough for safe passage to caribou hunting grounds. Many commented on this change in access to caribou hunting" (Jones and Cunningham 2020:98).

Table 2. The number of people living in northern Alaska Peninsula communities. Residents of these communities have been eligible to harvest caribou in Units 9C remainder and 9E since 2016 when hunting opportunity was provided for the first time since 2004 (ADCCED 2022).

Community of residence	Community	1980	1990	200	2010	2020
9C	King Salmon	545	696	442	374	307
9C	Naknek	318	575	678	544	470
9C	South Naknek	145	136	137	79	67
9E	Egegik	75	122	116	109	39
9E	Chignik Bay	178	188	79	91	97
9E	Chignik Lagoon	48	53	103	78	72
9E	Chignik Lake	138	133	145	73	61
9E	Ivanof Bay	40	35	22	7	1
9E	Perryville	111	108	112	113	88
9E	Pilot Point	66	53	100	68	70
9E	Port Heiden	92	119	119	102	100
9E	Ugashik	13	7	11	12	4
9D	Nelson Lagoon	59	83	83	52	41
9D	Sand Point	625	878	952	976	578
	TOTAL	2,453	3,186	3,099	2,678	1,995

Table 3. The estimated harvest of caribou by residents of communities eligible to harvest caribou in Units 9C remainder and 9E for one year study periods since reopening in 2016 (CI 95%, lower harvest estimate is the lower bound of the estimate or the reported harvest, whichever is larger) (ADF&G 2022a).

Community	Study year	Estimated Harvest	Lower harvest estimate	Upper harvest estimate	Per person harvest in pounds edible weight
Port Heiden	2018	44	37	51	64
Port Heiden	2016	31	23	39	44
Chignik Bay	2016	6	5	8	11
Chignik Lagoon	2016	0	0	0	0
Chignik Lake	2016	6	5	8	9
Egegik	2016	0	0	0	0
Perryville	2016	6	4	9	8
Sand Point	2016	4	2	7	1

Harvest History

Harvest of the NAPCH peaked in 1993 and has declined since. These changes correspond to population size and harvest restrictions. Between 1990 and 1993, when the herd was large and seasons and harvest limits were liberal, annual reported harvest approached or exceeded 800 caribou annually. Declining herd size, fluctuating distribution and more restrictive regulations resulted in reported annual harvests of 400 – 500 caribou between 1994 and 1999 (**Table 4**). Reported harvest during the 1990s was skewed heavily toward hunters residing outside of Units 9C and 9E. However, unreported harvest was high at an estimated 500 – 1,500 caribou annually, particularly among residents of Units 9C and 9E. Accounting for this, residents of Units 9C and 9E likely harvested a greater proportion than harvest data suggests (Sellers 1995, 1999).

In 1999, following implementation of the State Tier II hunt, more restrictive Federal regulations, and implementation of the Federal public lands closure, reported harvest declined dramatically, averaging just 96 caribou per year between 1999 and 2004 (**Table 4**). User demographics shifted as well, with at least 90% of the reported harvest attributable to local users, defined here as those who are currently eligible to harvest caribou on Federal public lands in either Unit 9C remainder or in Unit 9E (residents of Units 9C, Egegik, 9E, Sand Point, and Nelson Lagoon). Legal harvest ceased in 2005, following closure of the State and Federal hunting seasons (ADF&G 2018b).

Federal and State seasons were reestablished in 2016. Since then, State reported harvest has averaged 52 caribou annually (**Table 4**), all of which were taken by local users. Federal reported harvest has averaged 2 caribou annually (**Table 5**). On average, harvest was 84% bulls, and 60% of reporting hunters were successful. Nearly two-thirds of the total harvest was taken during the winter hunt, between December and April. September and December were the most popular months, with an average of 19% of the total harvest occurring during each of these months (ADF&G 2018b, 2019c). Local biologists believe that the NAPCH can sustain a 4% harvest rate (152 caribou, based on 2018 population) and continue to grow (BOG 2018). Local State and

Federal managers have the authority to manage for this quota through Emergency Orders and Special Actions. The quota has not been exceeded since seasons were opened in 2016.

Table 4. Reported harvest of the Northern Alaska Peninsula Caribou Herd 1990 – 2021, by sex. (Sellers 1995, 1999; ADF&G 2018b, 2019c, 2022b).

	Harvest (number of caribou)			
Year	**Total**	**Males**	**Females**	**Unknown Sex**
1990	791	679	110	2
1991	806	688	115	3
1992	921	816	98	7
1993	1,345	1,165	175	5
1994	569	478	91	-
1995	533	486	47	-
1996	481	438	43	-
1997	482	446	36	-
1998	490	453	31	6
1999	155	147	8	-
2000	82	76	6	-
2001	95	87	8	-
2002	82	78	4	-
2003	128	122	6	-
2004	32	30	2	-
2005-2015[a]	-	-	-	-
2016	82	74	8	-
2017	58	42	16	-
2018	63	55	8	-
2019	43	39	3	1
2020	38	26	12	-
2021	25	23	1	1

[a]No season

Table 5. Reported harvest with Federal permits (FC0914, Unit 9C remainder and FC0915, Unit 9E) from 2016-2021 (OSM 2022). (Prior to 2017, FC0914 was CE0920.)

	FC0914		**FC0915**	
	Permits Issued	**Successful**	**Permits Issued**	**Successful**
2016	1	1	0	0
2017	2	0	0	0
2018	5	0	8	3
2019	4	0	11	3
2020	0	0	3	1
2021	2	0	2	0
2022	0	0	5	0

Effects

Retaining the status quo would maintain the Federal subsistence priority and continue Federally qualified subsistence users to harvest at low levels on Federal public land. The caribou population remains low, and recruitment continues to be low. The population is unable to sustain additional harvest.

Rescinding the closure would allow for non-Federally qualified subsistence users to hunt caribou on Federal public lands under State regulations. Historically a large number of non-Federally qualified subsistence users hunted this area; however, currently the State hunt is a Tier II permit hunt, which limits participation and harvest. Currently the caribou population is not large enough to sustain high levels of hunting pressure or any additional harvest.

Modifying the closure to open to all Federally qualified subsistence users and, closed to non-Federally qualified users would allow a larger number of subsistence users to harvest caribou. Currently, the population of the NAPCH remains low and is unable to sustain additional harvest. There remains a conservation concern for the herd.

Modifying the closure to close to all users would prevent Federally qualified subsistence users from harvesting an important subsistence source. While the population of the NAPCH is low, it is on the rise from the lowest point in 2010, and current harvest levels appear to be sustainable (Crowley 2014 pers. comm.), but it is still not large enough to open to all users.

OSM PRELIMINARY CONCLUSION:

X Retain the Status Quo
_ Rescind the Closure
_ Modify the closure to . . .
_ Defer Decision on the Closure or Take No Action

Justification

The NAPCH remains a population of concern in Unit 9C remainder and Unit 9E. Although this population has shown recent improvement in population size, as well as bull:cow and calf:cow ratios, it remains well below the established population size objective. The current management approach, which includes the State's Tier II hunt, limiting harvest on Federal lands to those with recognized customary and traditional use of the resource and direct dependence on it, and a harvest quota managed by Emergency Order/Special Action, appears to be effective in allowing harvest while supporting population growth. Consequently, retaining the Federal public lands closure within Units 9C remainder and 9E is appropriate and likely offers the best opportunity for both continuations of subsistence uses and recovery of the NAPCH.

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APPENDIX 1

Appendix 1. The estimated harvest of caribou by residents of communities eligible to harvest caribou in Units 9C remainder and 9E for one year study periods between 1983 and 2018 (CI 95%, lower harvest estimate is the lower bound of the estimate or the reported harvest, whichever is larger) (ADF&G 2022).

Unit of residence	Community	Study year	Estimated Harvest	Lower harvest estimate	Upper harvest estimate	Per person harvest
9C	King Salmon	1983	182	122	242	74
		1994	226	155	297	92
		1995	183	121	245	66
		1996	114	58	169	46
		2007	16	14	18	10
	Naknek	1983	140	92	188	55
		1994	432	332	532	118
		1995	252	167	336	70
		1996	279	201	357	82
		2007	74	66	83	21
	South Naknek	1983	135	75	195	147
		1992	82	68	100	91
		1994	103	77	129	119
		1995	128	110	149	133
		1996	138	128	175	157
		2007	2	2	3	7
9E	Chignik Bay	1984	6	4	9	7
		1989	12	11	15	15
		1991	13	9	20	16
		1994	1	1	2	2
		1995	3	3	5	6
		1996	5	5	6	9
		2003	1	1	3	2
		2016	6	6	8	11
	Chignik Lagoon	1984	5	4	8	11
		1989	4	4	4	15
		1994	21	20	24	33
		1995	15	9	26	25
		1996	5	3	9	10
		2003	8	6	13	17
		2016	0	0	0	0
	Chignik Lake	1984	82	66	98	79
		1989	129	97	180	173
		1991	105	79	131	120
		1994	111	91	134	105
		1995	67	48	86	88
		1996	55	36	77	76
		2003	19	13	33	25
		2016	6	5	8	9
	Egegik	1984	151	112	190	233
		1994	147	90	204	186
		1995	128	109	146	144

Unit of residence	Community	Study year	Estimated Harvest	Lower harvest estimate	Upper harvest estimate	Per person harvest
		1996	77	56	98	86
		2014	0	0	0	0
		2016	0	0	0	0
	Ivanof Bay	1984	20	12	31	82
		1989	23	23	23	108
		1994	5	4	6	21
		1995	14	9	29	52
		1996	13	13	13	78
	Perryville	1984	30	22	41	39
		1989	22	19	29	28
		1994	12	8	22	18
		1995	24	15	49	27
		1996	23	16	42	29
		2003	12	10	17	15
		2016	6	4	9	8
	Pilot Point	1987	98	93	109	229
	PilotPoint/Ugashik	1991	135	135	135	261
	Pilot Point	1994	127	118	144	182
		1995	51	44	61	65
		1996	129	113	160	170
		2014	0	0	0	0
	Port Heiden	1987	168	168	168	245
		1991	174	174	174	227
		1994	139	114	178	197
		1995	240	167	312	275
		1996	175	120	241	228
		2016	31	23	39	44
		2018	44	37	51	64
	Ugashik	1987	20	20	20	300
		1994	21	16	26	350
		1995	21	13	29	300
		1996	34	31	37	435
		2014	0	0	0	0
9D	Nelson Lagoon	1987	53	38	81	119
	Sand Point	1992	39	22	56	10
		2016	4	2	7	1

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WP20 16/17 Executive Summary	
General Description	**Proposal WP24-16** is a request to add the rural residents of Unit 9C, including the communities of King Salmon, Naknek, and South Naknek, to the group of communities who are eligible to harvest caribou in Unit 9E. *Submitted by: the Bristol Bay Regional Advisory Council* **Proposal WP24-17** is a request to add the communities of King Salmon, Naknek, and South Naknek to the group of communities who are eligible to harvest caribou in Unit 9E. *Submitted by: Adam Grenda of King Salmon*
Proposed Regulation	**Proposal WP24-16** **Unit 9E—Caribou** *1 bull by Federal registration permit (FC0915) or State permit.* — *May be announced* Federal public lands are closed to the taking of caribou except by residents of **Unit 9C**, Unit 9E, Nelson Lagoon, and Sand Point. **Proposal WP24-17** **Unit 9E—Caribou** *1 bull by Federal registration permit (FC0915) or State permit.* — *May be announced* *Federal public lands are closed to the taking of caribou except by residents of **King Salmon, Naknek,** Nelson Lagoon, Sand Point, **and South Naknek**.*
OSM Preliminary Conclusion	**Support** Proposal **WP24-16**. **Take no action** on Proposal **WP24-17** based on action to support Proposal WP24-16.
Bristol Bay Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	

WP20 16/17 Executive Summary	
ADF&G Comments	
Written Public Comments	**None**

DRAFT STAFF ANALYSIS
WP24-16/17

ISSUES

Proposal WP24-16, submitted by the Bristol Bay Regional Advisory Council, is a request to add the rural residents of Unit 9C, including the communities of King Salmon, Naknek, and South Naknek, to the group of communities who are eligible to harvest caribou in Unit 9E.

Proposal WP24-17, submitted by Adam Grenda of King Salmon, is a request to add the communities of King Salmon, Naknek, and South Naknek to the group of communities who are eligible to harvest caribou in Unit 9E.

DISCUSSION

Proposal WP24-16

The proponent of Proposal WP24-16, the Bristol Bay Council, said that residents of King Salmon, Naknek, and South Naknek have many generations of customary and traditional use of caribou in Unit 9E, and the alternative in Unit 9C is the Mulchatna caribou herd; however, the population of caribou in the Mulchatna herd has declined.

Proposal WP24-17

The proponent of Proposal WP24-16 wants to hunt caribou on Federal public lands in Unit 9E during the Federal caribou seasons of August 10–October 10 and November 1–April 30, but currently, he is not eligible. He said King Salmon, Naknek, and South Naknek residents hunted northern Alaska Peninsula caribou in Unit 9 when the herd was thriving from the 1970s to the 1990s. Currently, there is a State Tier II hunt for caribou on State-managed lands in Unit 9E (TC505); however, the proponent states the majority of caribou spend summer, fall, and winter on Federal public lands in Unit 9E. The proponent continues,

> Early in the season caribou spend their time in higher elevations out of the bugs and where they have the advantage of being able to see long distances to watch for predators. Later as they start to migrate, they stay on Unit 9 Federal lands and will not enter State lands during the hunting season. Later into winter, most caribou get taken via snow machine. Usually, March is one of the best months for us to hunt on snow machine for caribou. This is because the days are longer, and we usually have a lot of snowfall during that timeframe. However, Unit 9C [State season] closes at the end of February, and we have to travel further south into Unit 9E to get to an open hunt area. This is completely feasible except for the fact that we are unable to hunt Unit 9E Federal lands, which really limits where we can take caribou in Unit 9E.

The proponent submitted information from Alaska Department of Fish and Game (ADF&G) studies in order to demonstrate the vital importance of caribou to the communities and show that caribou were the most important ungulate harvested for food. He said because of many factors, moose have not been and still are not the main sources of meat for families in these communities. He said in 2023, ADF&G increased the number of available Tier II permits (hunt TC505) for Units 9C and 9E from 300 to 600 to increase the caribou harvest; the Northern Alaska Peninsula caribou herd is growing and can sustain this harvest. In ending, the proponent said this is a simple yet effective rule change that will give the communities access to lands on the Alaska Peninsula to target caribou they have heavily relied on in the past as a food source.

Existing Federal Regulation

Unit 9E—Caribou

1 bull by Federal registration permit (FC0915) or State permit. *May be announced*

Federal public lands are closed to the taking of caribou except by residents of Unit 9E, Nelson Lagoon, and Sand Point.

Proposed Federal Regulation

Proposal WP24-16

Unit 9E—Caribou

1 bull by Federal registration permit (FC0915) or State permit. *May be announced*

*Federal public lands are closed to the taking of caribou except by residents of **Unit 9C**, Unit 9E, Nelson Lagoon, and Sand Point.*

Proposal WP24-17

Unit 9E—Caribou

1 bull by Federal registration permit (FC0915) or State permit. *May be announced*

*Federal public lands are closed to the taking of caribou except by residents of Unit 9E, **King Salmon, Naknek**, Nelson Lagoon, Sand Point, and **South Naknek***

Existing State Regulation

Unit 9E—Caribou

1 caribou by permit (TC505)	*Aug. 10–Oct. 10*
	Nov. 1–April 30

Extent of Federal Public Lands/Waters

Unit 9E is comprised of approximately 49% Federal public lands and consists of 44% U.S. Fish and Wildlife Service (USFWS) lands, 5% National Park Service lands, and less than 0.1 % Bureau of Land Management lands. These Federal public lands are primarily within the boundaries of Becharof and Alaska Peninsula national wildlife refuges and Aniakchak National Monument and Preserve (see **Figure 1**).

Customary and Traditional Use Determination

Rural residents of Units 9B, 9C, 9E, 17, and the communities of Nelson Lagoon and Sand Point have a customary and traditional use determination for caribou in Unit 9E..

However, currently Federal public lands in Unit 9E are closed to the taking of caribou except by rural residents of Unit 9E and the communities of Nelson Lagoon, and Sand Point, based on the three criteria in Alaska National Interest Lands Conservation Act (ANILCA) section 804.

Additionally, concerning Aniakchak National Monument in Unit 9E, under the guidelines of ANILCA, National Park Service regulations identify qualified local rural subsistence users in National Parks and National Monuments by: (1) identifying Resident Zone Communities that include a significant concentration of people who have customarily and traditionally used subsistence resources on park lands; and (2) identifying and issuing subsistence use (13.440) permits to individuals residing outside of the Resident Zone Communities who have a personal or family history of subsistence use within the park or monument.

Regulatory History

In 1999, the Federal Subsistence Board adopted the recommendation of the Bristol Bay Regional Advisory Council and closed Federal public lands that are south of the Naknek River drainage in Units 9C and 9E to the harvest of caribou except by residents of Units 9C and 9E (Proposal WP99-32/33/34). This was due to the declining population of the northern Alaska Peninsula caribou herd and local residents' dependence upon this subsistence resource. Adoption of the proposals changed the harvest limit in Units 9C and 9E from 4 caribou annually to one bull by Federal permit (64 Fed. Reg. 126; 35777, 35800 [July 1, 1999]).

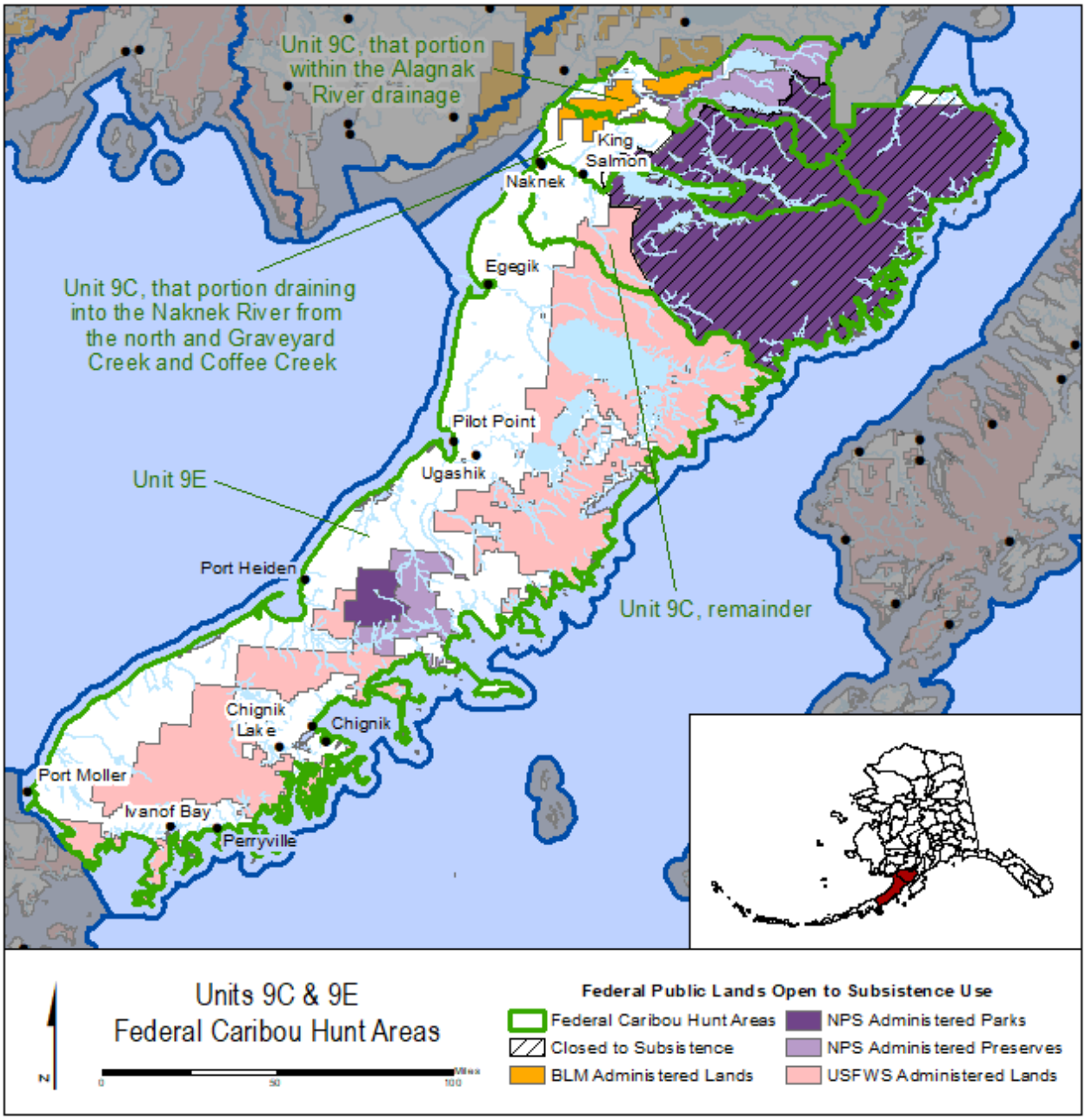

Figure 1. Federal caribou hunt areas in Units 9C and 9E in 2023.

In 2005 the Board approved Emergency Special Action WSA05-02, submitted by OSM, and temporarily closed Federal public lands in Units 9C remainder and 9E to the harvest of caribou except by federally qualified subsistence users. Subsequently, Temporary Special Action WSA05-11 was submitted, a necessary step to extend the closure beyond the 60-day period approved through WSA05-02. With support of the Bristol Bay Council, the Board adopted this special action, resulting in closure of the caribou season for the entirety of the 2005 regulatory year (BBSRAC 2005:124, OSM 2023a).

In 2006 the Board agreed with the Bristol Bay Council and adopted Proposal WP06-22, which closed Federal public lands in Units 9C remainder and 9E to the harvest of caribou by all user groups. The Board

took this action due to conservation concerns based on the continued decline of the Northern Alaska Peninsula caribou herd (OSM 2006; 71 Fed. Reg. 126, 37645, 37668 [June 30, 2006]). The State Tier II hunt was closed in 2005 as well.

In 2010 the Bristol Bay Council was briefed on Wildlife Closure Review WCR10-04/06, which discussed the closure for caribou in Units 9C remainder and 9E. The Council recommended retaining the closure based on conservation concerns for the caribou herd (OSM 2011, 2023b).

In 2014, the Council considered Wildlife Closure Review WCR14-04/06 and submitted Proposal WP16-21. Specifically, the Council requested that the closure be modified to allow caribou harvests by residents of 9C and 9E. The Council also requested that a may-be-announced caribou season be established in Units 9C remainder and 9E, noting that the State was considering opening a Tier II subsistence hunt. The Council believed that it would be useful for Federal managers to have the flexibility to open a hunt on Federal lands as well, particularly considering the extent of Federal lands in Unit 9. In 2016 the Board agreed with the Bristol Bay Council and adopted with modification to reduce the pool of eligible subsistence users on Federal public lands in Unit 9C remainder to residents of Unit 9C and Egegik, and on Federal public lands in Unit 9E to residents of 9E, Nelson Lagoon and Sand Point, based on the three criteria in ANILCA section 804. It was noted that residents of Unit 9E are not in the customary and traditional use determination for caribou in Unit 9C (BBRAC 2016; 81 Fed. Reg. 152, 52553 [August 8, 2016]).

Biological Background

Generally speaking, the Northern Alaska caribou herd occupies Units 9C and 9E, from the Naknek River in the north to Port Moller in the south (see **Figure 1**). It has varied considerably in size in the last century, ranging from approximately 2,000 during population lows to approximately 20,000 during population highs. These fluctuations in population size have been accompanied by shifts in distribution and movement patterns, likely due to impacts of population size on habitat quality. Following the most recent population peak in the mid-1980s, the herd began wintering north of the Naknek River. More recently, this northern range has become less important, with few caribou crossing to the north side of the Naknek River by 2000 (Crowley 2015).

The herd experienced a steady multi-decade decline in population size between the mid-1980s and the mid-2010s, approximating historical lows of 2,000 caribou. Nutritional limitations have been implicated in the decline. In recent years, the population has showed a positive growth trend and is currently estimated to be approximately 3,800 caribou but remains well below the State's population objective of 12,000 – 15,000 caribou (Crowley 2014, 2015, 2016; 2019, pers. comm.).

Community Background

Residents of only 11 communities area currently eligible to harvest caribou in Unit 9E. Eight are situated within Unit 9E (Chignik, Chignik Lagoon, Chignik Lake, Egegik, Ivanof Bay, Perryville, Pilot Point, and Port Heiden) and two are situated south of Unit 9E (Nelson Lagoon and Sand Point), based on the three criteria in ANILCA section 804: (1) customary and direct dependence upon the populations as the

mainstay of livelihood, (2) local residency, and (3) the availability of alternative resources. These communities share some characteristics. Almost all are small with populations of less than 100 people, and populations have been trending downward since the 2000 U.S. Census (ADCCED 2023, **Table 1**). Most of these communities are not connected by roads and are accessed by boats or planes. The proposal is a request to add three communities, which are King Salmon, Naknek, and South Naknek, to the pool of those eligible to harvest caribou in Unit 9E (**Table 2**). This would significantly increase the number of people eligible to harvest caribou from Federal public lands in Unit 9E. These three communities together are the entire population of the Bristol Bay Borough and Unit 9C. King Salmon and Naknek are connected by a State-maintained 15-mile paved road.

Table 1. Human population of the communities currently eligible (source: ADCCED 2023).

Community	1980	1990	2000	2010	2020
Chignik	178	188	79	91	97
Chignik Lagoon	48	53	103	78	72
Chignik Lake	138	133	145	73	61
Egegik	75	122	116	109	39
Ivanof Bay	40	35	22	7	1
Nelson Lagoon	59	83	83	52	41
Perryville	111	108	112	113	88
Pilot Point	66	53	100	68	70
Port Heiden	92	119	119	102	100
Sand Point	625	878	952	976	578
Ugashik	13	7	11	12	4
TOTAL	1,445	1,779	1,842	1,681	1,151

Table 2. Human population of the communities in the request (source: ADCCED 2023).

Community	1980	1990	2000	2010	2020
King Salmon	545	696	442	374	307
Naknek	318	575	678	544	470
South Naknek	145	136	137	79	67
TOTAL	1,008	1,407	1,257	997	844

Customary Knowledge and Traditional Practices

Caribou were among the most important subsistence resources for these Alaska Peninsula communities (Fall 1993). The herd last peaked in about 1984, and harvest seasons were closed from 2005 through 2015. Residents of eligible communities have reported their harvests on household surveys since 1983. Communities' overall harvest of caribou and per person harvest in pounds of edible weight have generally decreased since the 1990s (see **Appendix**; ADF&G 2023).

In the 1980s and 1990s, Pacific drainage communities in Unit 9E harvested caribou at generally lower rates than communities on the Bristol Bay side because of less access to caribou on the Pacific side (Fall 1993). The Bristol Bay coastal plain on the Bering Sea side of Unit 9E consists of flat to rolling tundra, lakes, shrub habitat, and poorly drained meadows. The Pacific side consists of mountainous terrain with steep faces and cliffs, sandy beaches, shrub habitat and sedge meadows. The Aleutian Mountain Range separates these areas.

The most recent household harvest surveys were conducted in 2014, 2016, and 2018. Residents of Egegik, Pilot Point, and Ugashik participated in harvest surveys in 2014 before the hunting season re-opened in 2016 (Sill et al. 2022). Residents commented on their preference for caribou, "Many respondents, particularly elders, commented that though salmon was a very important food source, caribou remained their preferred wild resource even though many had not had any in longer than two decades. There were residents who longed for caribou to return to their region so they could once again acquire them to feed their families" (Sill et al. 2022:247).

Some expressed fear that people would lose the ability to hunt and process caribou with legal hunts being closed for so long. An Ugashik resident made this comment during they survey, "I worry that the younger generation will not have anyone to teach them how to hunt if caribou return." Others spoke of how much they missed eating caribou, for example from Pilot Point, "I have not had one piece of caribou in so long I can't remember, but I can still taste it" (Sill et al. 2022:247).

Some harvesting opportunity has been available since 2015. The results of harvest surveys conducted since 2015 are described in **Table 3**.

Table 3. The estimated harvest of caribou for one year study periods by communities eligible to harvest caribou in Unit 9E since reopening in 2016, based on households harvest surveys (CI 95%, lower harvest estimate is the lower bound of the estimate or the reported harvest, whichever is larger; source: ADF&G 2023).

Community	Study year	Number of households interviewed	Percentage of households using caribou	Estimated harvest of caribou	Lower estimate	Upper estimate	Per person harvest (in pounds of edible weight)
Chignik City	2016	24	46%	6	5	8	11
Chignik Lagoon	2016	20	30%	0	0	0	0
Chignik Lake	2016	28	61%	6	5	8	9
Egegik	2016	20	10%	0	0	0	0
Perryville	2016	26	50%	6	4	9	8
Port Heiden	2016	27	79%	31	23	39	44
Sand Point	2016	101	15%	4	2	7	1
Port Heiden	2018	27	93%	44	37	51	64

In 2018, Port Heiden community members commented on their experiences hunting caribou since 2015 after the long closure and reduced herd size. Jones and Cunningham (2020) described these comments,

> Reestablishing caribou hunting also regenerated important learning, sharing, and trading networks within the community and with other communities. Port Heiden residents explained that enough people are still around and available to help bestow their caribou hunting and processing wisdom upon the younger generation whose members had yet to experience caribou hunting due to the regulatory closure. Regarding the transmission of caribou hunting knowledge, one key respondent explained: ". . . . Tier II caribou hunts closed, and hunting was a lost art. They [Port Heiden youth] didn't know how to hunt, where to go, how to process. We're lucky that hunt came back, and we were able to get the young people involved" (Jones and Cunningham 2020:100).

Jones and Cunningham (2020) described changes in hunting patterns in 2018 compared to the 1980s and 1990s, "According to elders and expert caribou hunters from Port Heiden, in the past, frozen rivers provided access to caribou hunting areas throughout the Alaska Peninsula. However, since the Tier II permit hunt opened in 2016, many of the rivers that hunters traditionally used for winter travel have not frozen adequately enough for safe passage to caribou hunting grounds. Many commented on this change in access to caribou hunting" (Jones and Cunningham 2020:98).

Harvest History

Caribou harvest and use data before 2013 are lacking or incomplete for Unit 9 communities. One cause of this data gap is that while caribou hunters were required to obtain harvest tickets before hunting in some areas of Unit 9 before the 2013 regulatory year, returning harvest reports was not always mandatory. Information concerning the harvest and use of caribou in Unit 9 was obtained primarily through household harvest surveys (see the results of these surveys in the **Appendix**; ADF&G 2015, 2023; USFWS 2015).

The reported harvest of the northern Alaska Peninsula caribou has varied considerably since 1990. These changes correspond to herd size and harvest restrictions. Between 1990 and 1993, when the herd was large and seasons and harvest limits were liberal, annual reported harvest approached or exceeded 800 caribou annually. Declining herd size, fluctuating distribution and more restrictive regulations resulted in reported harvests of from 400 to 500 caribou annually between 1994 and 1999. Reported harvest during the 1990s was skewed heavily toward hunters residing outside of Units 9C and 9E. However, unreported harvest was high from an estimated 500 to 1,500 caribou annually, particularly among residents of Units 9C and 9E. Accounting for this, residents of Units 9C and 9E likely harvested a greater proportion than harvest data in the State reporting system suggests (Sellers 1995, 1999).

In 1999, following implementation of the State Tier II hunt, more restrictive Federal regulations, and implementation of the Federal public lands closure, reported harvest declined dramatically, averaging just 96 caribou per year between 1999 and 2004. User demographics shifted as well, with at least 90% of the reported harvest attributed to those people who are currently eligible to harvest caribou on Federal public lands in either Unit 9C remainder or in Unit 9E (residents of Units 9C, 9E, Sand Point and Nelson Lagoon). Legal harvest ceased in 2005 in Unit 9C remainder and 9E following closure of the State and Federal hunting seasons (ADF&G 2018b).

Federal and State seasons were reestablished in 2016. Since then, State reported harvest has averaged 52 caribou annually, all of which were taken by residents of Unit 9C remainder or Unit 9E. Federal reported harvest has averaged 2 caribou annually. Nearly two-thirds of the total harvest was taken during the winter hunt, between December and April. September and December were the most popular months, with an average of 19% of the total harvest occurring during each of these months (ADF&G 2018b, 2019c). Local biologists believe that the herd can sustain a 4% harvest rate (152 caribou, based on 2018 population) and continue to grow (Alaska Board of Game 2018). Local State and Federal managers have the authority to manage for this quota through emergency orders and special actions. The quota has not been exceeded since seasons were opened in 2016.

ANILCA Section 804 Subsistence User Prioritization

Section 804 of ANILCA mandates that the taking on Federal public lands of fish and wildlife for nonwasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes. Section 804 further requires that whenever it is necessary to restrict the taking of populations of fish and wildlife on such lands for subsistence uses in order to protect the continued viability of such populations, or to continue subsistence uses, such a priority shall be implemented through appropriate limitations based on the application of three criteria. The three criteria are: (1) customary and direct dependence upon the populations as the mainstay of livelihood, (2) local residency, and (3) the availability of alternative resources. In other words, an analysis based on Section 804 of ANILCA identifies which residents of communities or areas have a priority for the take of the resource. The Board does not use such decisions for resource management or for restricting harvest. The Board addresses conservation concerns for a particular population through the imposition of harvest limits or season restrictions.

In this case, the Board has been asked to increase the pool of federally qualified subsistence users to rural residents of Units 9C (the communities of King Salmon, Naknek, and South Naknek), 9E, and the communities of Nelson Lagoon and Sand Point. These will be the communities who are eligible to hunt for caribou in Unit 9E. Currently, Unit 9C communities are excluded and have been since 2016 when the hunting season in Unit 9E re-opened after a long closure, and the ANILCA section 804 in current regulations was implemented by the Board. Without the ANILCA section 804 currently in place, roughly 8,400 people in 33 widely dispersed communities would be eligible based on the customary and traditional use determination for caribou in Unit 9E (ADLWD 2023).

1. Customary and Direct Dependence upon the Populations as a Mainstay of Livelihood

Table 4 demonstrates that Unit 9C communities are highly dependent on caribou, based on household harvest surveys conducted periodically between 1983 and 2007. Additionally, between 33% and 93% of surveyed households in each community reported using caribou during each study year. In 1983, when surveys of the harvest of all wild resources were conducted, caribou were 35% of total harvest of all wild resources in pounds of edible weight in King Salmon, 29% in Naknek, and 55% in South Naknek (ADF&G 2023).

Table 4. The estimated harvest of caribou for one year study periods by communities in the request, based on households harvest surveys (CI 95%, lower harvest estimate is the lower bound of the estimate or the reported harvest, whichever is larger) (source: ADF&G 2023).

Community	Study year	Number of households interviewed	Percentage of households using caribou	Estimated harvest of caribou	Lower estimate	Upper estimate	Per person harvest (in pounds of edible weight)
King Salmon	2007	49	33%	16	14	18	10
	1996	32	76%	114	58	169	46
	1995	26	87%	183	121	245	66
	1994	37	86%	226	155	297	92
	1983	43	74%	182	122	242	74
Naknek	2007	75	49%	74	66	83	21
	1996	43	67%	279	201	357	82
	1995	41	57%	252	167	336	70
	1994	59	85%	432	332	532	118
	1983	52	73%	140	92	188	55
South Naknek	2007	21	62%	2	2	3	7
	1996	35	89%	138	128	175	157
	1995	31	87%	128	110	149	133
	1994	25	96%	103	77	129	119
	1992	35	86%	82	68	100	91
	1983	21	91%	135	75	195	148

In 2016 the Board implemented the ANILCA section 804 in effect today (Proposal WP16-21). Harvest records used when making that decision indicated residents of Unit 9C were harvesting caribou from the Mulchatna herd in areas that are north of the Naknek River. These areas are now closed to caribou harvest due to the decline in the Mulchatna Caribou Herd's population. Currently Unit 9C communities do not have alternative populations of caribou to harvest. They have only northern Alaska Peninsula caribou in Units 9C remainder and 9E (OSM 2023c).

Subsistence studies also indicate that the three communities were dependent on Unit 9E caribou in the past, as described by the proponents of these Proposals WP24-16 and 17 (Fall 1993).

2. Local Residency

Naknek and South Naknek are situated in Unit 9C immediately adjacent to the boundary with Unit 9E The boundary is not a geographic feature visible on the landscape and is defined by the southern extent of the Naknek River drainage (see **Figure 1)**. The boundary begins just south of the mouth of the Naknek River in an area where Naknek and South Naknek are situated. King Salmon is connected to Naknek by a 15-mile paved road and is otherwise about 20 miles due north of the boundary of Unit 9E. Hunt areas in Unit 9E are accessed by boats during the fall hunt and by snowmachines and all-terrain vehicles during the winter hunt.

3. Availability of Alternative Resources

King Salmon, Naknek, and South Naknek are all highly dependent upon the annual cycle of subsistence harvests of resources (ADF&G 2023). The harvest of wild resources is a critical component of the economies in these communities, and the communities rely on the harvest of a wide diversity of resources, including salmon, nonsalmon fish, land mammals (caribou, moose), marine mammals (seals, sea lions), migratory waterfowl (ducks, geese), other birds (ptarmigan, grouse), furbearers, berries, greens, and wood. It is typical for harvests to be dominated by fish and large land mammals, including caribou and moose (Morris 1985, Jones and Cunningham 2020, ADF&G 2023).

The Mulchatna Caribou Herd is located in Units 9B, 9C, 17A, 17B, 17C, 18, 19A and 19B. Population estimates show an increase from 18,599 in 1981 to 200,000 in 1996. Subsequently, the herd began a period of decline that persisted until recently (Barten 2017, ADF&G 2019a). The most recent estimates, obtained in July 2020, 2021, and 2022, were approximately 13,500, 12,850, and 12,112 caribou. These estimates are less than half of the State's minimum population objective (ADF&G 2020, 2021a; BBRAC 2023). The decline in the caribou population may be due to a combination of factors including predation, weather, nutrition, survival rates, and disease. In the 1990s the Mulchatna Caribou Herd was expanding its range and may have overharvested resources needed for survival, while at the same time hunters reported seeing more wolves and bears in the areas where they hunted caribou (Woolington 2013). The portion of the Mulchatna herd's range in Unit 9C north of the Naknek River is currently closed under State regulations. While an open season exists in Federal regulations, no harvest has been reported, likely because Federally qualified subsistence hunters can't get a State registration permit that they need to hunt in this area under Federal regulations.

Declining caribou populations in Unit 9 have led to increased tensions between user groups wanting to harvest more moose as caribou numbers dropped (Riley 2011). Overall, according to ADF&G, "Harvests in Unit 9 have remained relatively stable for the past 30 years, despite major changes to moose regulations. Recent declines in moose harvest have been associated with a decrease in the number of people hunting moose in Unit 9" (Riley 2011:112). All communities opportunistically harvest caribou or moose, depending on what is available and the regulations in place. Restricting the harvest of caribou in a given area will presumably have an impact on moose populations and vice versa, because many hunters are opportunistic and will harvest whatever large land mammals are available.

Effects of the Proposal

If Proposal WP24-16/17 is adopted, then residents of Unit 9C will be eligible to harvest caribou on Federal public lands in Unit 9E under Federal regulations. These Federal public lands are primarily within the boundaries of Becharof and Alaska Peninsula National Wildlife Refuges and Aniakchak National Monument and Preserve. Adopting the proposal will have no effect on other users or moose populations. These concerns are addressed through harvest limits or season lengths.

If Proposal WP24-16/17 is not adopted, then residents of Unit 9C will not be eligible to harvest caribou on the Federal public lands in Unit 9E.

OSM PRELIMINARY CONCLUSION

Support Proposal WP24-16.

Take no action on Proposal WP24-17 based on action to support Proposal WP24-16.

Justification

King Salmon, Naknek, and South Naknek have demonstrated increased dependence on caribou in Unit 9E over time since 2016 when this area was closed to hunting by them. Harvest records used when making that decision indicated residents of Unit 9C were still harvesting caribou from the Mulchatna herd in areas that are north of the Naknek River. These areas are now closed to caribou hunting due to the decline in Mulchatna Caribou Herd population. Currently Unit 9C communities do not have alternative populations of caribou to harvest. They have only Northern Alaska Peninsula caribou in Units 9C remainder and 9E. Additionally, King Salmon, Naknek, and South Naknek are situated adjacent to and nearby the Unit 9E boundary. Subsistence studies indicate that the three communities were dependent on Unit 9E caribou in the past. Supporting Proposal WP24-16 over Proposal WP24-17 is to clarify that these three communities make up the total population of Unit 9C, all of whom should be eligible to harvest caribou in Unit 9E.

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Appendix

The estimated harvest of caribou for one year study periods by communities currently eligible to harvest caribou in Units 9C remainder and/or 9E, based on household harvest surveys (CI 95%, lower harvest estimate is the lower bound of the estimate or the reported harvest, whichever is larger; source: ADF&G 2023).

Community	Study year	Number of households interviewed	Percentage of households using caribou	Estimated harvest caribou	Lower estimate	Upper estimate	Per person harvest (in pounds of edible weight)
Chignik Bay	1984	19	68%	6	4	9	7
	1989	35	77%	12	11	15	15
	1991	30	87%	13	9	20	16
	1994	24	71%	1	1	2	2
	1995	20	71%	3	3	5	6
	1996	17	63%	5	5	6	9
	2003	17	55%	1	1	3	2
	2016	24	46%	6	5	8	11
Chignik Lagoon	1984	17	77%	5	4	8	11
	1989	15	73%	4	4	4	15
	1994	27	93%	21	20	24	33
	1995	20	83%	15	9	26	25
	1996	18	93%	5	3	9	10
	2003	14	63%	8	6	13	17
	2016	20	30%	0	0	0	0
Chignik Lake	1984	23	100%	82	66	98	79
	1989	21	95%	129	97	180	173
	1991	24	100%	105	79	131	120
	1994	32	94%	111	91	134	105
	1995	19	100%	67	49	86	88
	1996	26	100%	55	36	77	76
	2003	21	95%	19	13	33	25
	2016	28	61%	6	5	8	9
Egegik	1984	25	96%	151	112	190	233
	1994	22	86%	147	90	204	186
	1995	26	94%	128	109	146	144
	1996	19	83%	77	56	98	86
	2014	20	0%	0	0	0	0
	2016	20	10%	0	0	0	0
Ivanof Bay	1984	6	100%	20	12	31	82
	1989	7	100%	23	23	23	108
	1994	8	88%	5	4	6	21
	1995	6	100%	14	9	29	52
	1996	7	100%	13	13	13	78
King Salmon	1983	43	74%	182	122	242	74
	1994	37	86%	226	155	297	92
	1995	26	87%	183	121	245	66
	1996	32	76%	114	58	169	46
	2007	48	33%	16	14	18	10
Naknek	1983	52	73%	140	92	188	55

Community	Study year	Number of households interviewed	Percentage of households using caribou	Estimated harvest caribou	Lower estimate	Upper estimate	Per person harvest (in pounds of edible weight)
	1994	59	85%	432	332	532	118
	1995	41	57%	252	167	336	70
	1996	43	67%	279	201	357	82
	2007	75	49%	74	66	83	21
Nelson Lagoon	1987	13	92%	53	38	81	119
Perryville	1984	20	100%	30	22	41	39
	1989	27	67%	22	19	29	28
	1994	20	75%	12	8	22	18
	1995	21	82%	24	15	49	27
	1996	25	86%	23	16	42	29
	2003	27	70%	12	10	17	15
	2016	26	50%	6	4	9	8
Pilot Point	1987	17	94%	98	93	109	229
	1994	27	100%	127	118	144	182
	1995	30	100%	51	44	61	65
	1996	28	100%	129	113	160	170
	2014	17	0%	0	0	0	0
Pilot Point / Ugashik	1991	18	100%	135	135	135	261
Port Heiden	1987	37	100%	168	168	168	245
	1991	28	100%	174	174	174	227
	1994	32	100%	139	114	178	197
	1995	26	100%	240	167	312	275
	1996	22	91%	175	120	241	228
	2016	29	79%	31	23	39	44
	2018	27	93%	44	37	51	64
Sand Point	1992	104	51%	39	22	56	10
	2016	101	15%	4	2	7	1
South Naknek	1983	21	91%	135	75	195	147
	1992	35	86%	82	68	100	91
	1994	25	96%	103	77	129	119
	1995	31	87%	128	110	149	133
	1996	35	89%	138	128	175	157
	2007	21	62%	2	2	3	7
Ugashik	1987	5	80%	20	20	20	300
	1994	2	100%	21	16	26	350
	1995	4	100%	21	13	29	300
	1996	6	100%	34	31	37	435
	2014	4	0%	0	0	0	0

WP24 01 Executive Summary	
General Description	Proposal WP24-01 is a request to allow the sale of brown bear hides. *Submitted by: Kaleb Rowland*
Proposed Regulation	**§___.25 Subsistence taking of fish, wildlife, and shellfish: general regulations** *(j) Utilization of fish, wildlife, or shellfish* . . . *(13) You may sell the raw/untanned and tanned hide or cape from a legally harvested **brown bear**, caribou, deer, elk, goat, moose, musk ox, and sheep.*
OSM Preliminary Conclusion	**Support** Proposal WP24-01 **with modification** to allow the sale of brown bear hides with claws attached in areas where the Federal harvest limit is two bears every regulatory year and after first obtaining a permit available at the time of sealing from an ADF&G sealing officer. The modified regulation should read: **§___.25 Subsistence taking of fish, wildlife, and shellfish: general regulations** *(j) Utilization of fish, wildlife, or shellfish* . . . *(13) You may sell the raw/untanned and tanned hide or cape from a legally harvested caribou, deer, elk, goat, moose, musk ox, sheep, **and brown bear with claws attached harvested in an area with a two brown bear limit per regulatory year in Federal regulations only after first obtaining a permit at the time of sealing from the Alaska Department of Fish and Game.***
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	

WP24 01 Executive Summary	
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Northwest Arctic Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
North Slope Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	

WP24 01 Executive Summary	
Written Public Comments	**None**

DRAFT STAFF ANALYSIS
WP24-01

ISSUE

Proposal WP24-01, submitted by Kaleb Rowland of McCarthy, Alaska, is a request to allow the sale of brown bear hides.

DISCUSSION

The proponent states federally qualified subsistence users in many areas of Alaska must salvage the hides of brown bears, however, the hides must not be sold. The proponent continues that the hides of many other legally harvested big game species may be sold, and brown bears should be added to this regulation.

Existing Federal Regulation

> **§___.25 Subsistence taking of fish, wildlife, and shellfish: general regulations**[1]
>
> *(j) Utilization of fish, wildlife, or shellfish*
>
> . . .
>
> *(13) You may sell the raw/untanned and tanned hide or cape from a legally harvested caribou, deer, elk, goat, moose, musk ox, and sheep.*

Proposed Federal Regulation

> **§___.25 Subsistence taking of fish, wildlife, and shellfish: general regulations**
>
> *(j) Utilization of fish, wildlife, or shellfish*
>
> . . .
>
> *(13) You may sell the raw/untanned and tanned hide or cape from a legally harvested* ***brown bear****, caribou, deer, elk, goat, moose, musk ox, and sheep.*

[1] Sections of the regulatory booklet produced for the public that describe legal utilization of brown bears are incorrect. The Code of Federal Regulations regarding the utilization of brown bears are correctly reflected in the **Appendix**.

Existing State Regulation

5 AAC 92.200—Purchase and sale of game

. . .

(b) Except as provided in 5 AAC 92.031, a person may not purchase, sell, advertise, or otherwise offer for sale:

(1) any part of a brown bear, except an article of handicraft made from the fur of a brown bear, and except skulls and hides with claws attached of brown bears harvested in areas where the bag limit is two bears per regulatory year by permit issued under 5 AAC 92.031;*

***Note**: The harvest limit for a resident hunting in Units 16B, 17, 19A, 19D, 20E, 21, 22A, 22B, 22D, 22E, 23, 24B, 25D, and 26A is two brown bears per regulatory year. A person may not take more than one brown bear, statewide, in any regulatory year, except that in these units, a person may take two brown bears per regulatory year (*5 AAC 92.132 Bag limit for brown bears*).

5 AAC 92.031 - Permit for selling skins, skulls, and trophies

. . .

(g) A person may sell, advertise, or otherwise offer for sale a skull or hide with claws attached of a brown bear harvested in an area where the bag limit is two brown bears per regulatory year only after first obtaining a permit from the department. Any advertisement must include the permit number assigned by the department, and the department will permanently mark all hides and skulls intended for sale. All bears sold under this permit must be reported to the department within the time frame specified on the permit.*

***Note**: A "Permit to Sell a Brown/Grizzly Bear Hide and/or Skull" is available at the time of sealing from the sealing officer.

Extent of Federal Public Lands

Federal public lands comprise approximately 54% of Alaska and consist of 20% U.S. Fish and Wildlife Service managed lands, 15% Bureau of Land Management managed lands, 14% National Park Service managed lands, and 6% U.S. Forest Service managed lands.

Customary and Traditional Use Determinations

This is a statewide proposal. For more information refer to the customary and traditional use determinations at *§___.24 Customary and traditional use determinations*.

Background

Convention on International Trade in Endangered Species of Wild Fauna and Flora

All Alaskan brown/grizzly bears are classified as the same species, *Ursus arctos*, but are referred to differently depending on where they are found and their diet. In general, the common name "brown bear" refers to those Ursus arctos found in the coastal regions, and the common name "grizzly bear" refers to those found in the interior. The brown bear conservation environment in the lower 48 is related but very different than in Alaska, which is the only remaining state with an abundant brown bear population. Brown bears once ranged from northern Alaska and western Canada south to Mexico, and from the west coast east across the great plains of the United States. Over the last 200 years, the number and range of brown bears south of Canada has declined by more than 95% largely as a result of excessive human caused mortality and habitat loss (ADF&G 2000). In 1990, fewer than 1,000 brown bears remained in the states south of the Canadian border (Schoen 1990). Today, Alaska is home to more than 98% of the brown bear population in the United States and 70% of the brown bears in North America (ADF&G 2000). With the demise of brown bears in other areas, Alaska has become a premier locale for trophy bear hunting.

In 1975 the North American brown bear was listed by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) as an Appendix II species, which means it may become threatened by extinction if trade is not strictly regulated and monitored. This listing is designed to protect threatened populations elsewhere in North America, outside of Alaska. Commercial trade, in Appendix II species is allowed only if the state of export issues permits reporting that the trade will not be detrimental to the survival of the species in the wild. The transport of brown bear parts between states or countries is subject to both State and Federal consideration and permitting (USFWS 2023).

Licensed hunting of brown bears occurs in four provinces and territories in Canada (Yukon, Northwest Territories, Nunavut, and British Columbia). In Canada, almost all trade in brown bear parts, including gall bladders and paws, is prohibited (some exceptions apply to Aboriginal groups for personal or ceremonial use). Some manufactured, non-food items, such as tanned hides, may be sold, but such trade in brown bear parts is low. In Canada, brown bears are mainly traded as hunting trophies (skins, rugs, or taxidermy mounts). A provincial or territorial permit is needed to legally possess, sell, and export brown bear parts, including those killed by accident or for defense of life and property. A CITES export permit is required for international export (Government of Canada 2012, 2014).

Sale of Hides

People have sold and exported brown bear pelts from Alaska for centuries. During the Russian Period in Alaska, the Russian American Company exported large numbers of brown bear skins to St. Petersburg and Asia (Bockstoce 2009).

Conservation efforts, led by Eastern conservationists, began with the passage of the Game Law of 1908 that implemented hunting seasons and a licensing system for brown bear parts that were being shipped out of Alaska, and limited exports to three brown bear hides annually per person and a $5 dollar fee on

each hide. The primary deterrent to the sale and export of brown bear hides was the export limit and fee (Holzworth 1930).

In 1925 a new game law was passed that eliminated market hunting of big game, including brown bears, and established the Alaska Game Commission, the predecessor to the Alaska Department of Fish and Game (ADF&G), that was responsible for imposing and revising seasons and harvest limits in Alaska. However, lack of enforcement and increases in sport and trophy hunting, especially for big coastal bears, continued to threaten brown bear populations in some areas of Alaska. Alaska Natives were exempted under the new law and were still permitted to hunt game at any time of year for food and to sell game hides within the state unless otherwise restricted (Dufresne 1965).

Beginning in 1961 after Alaska statehood, the purchase, sale, or barter of brown bears or brown bear parts was prohibited by the State of Alaska (State of Alaska 1961). Salvage and sealing requirements, introduced in 1961, mandated that a hunter retrieve the hide with claws attached and skull so that scientific information regarding the sex, age, and hide quality of harvested bears could be obtained by biologists. Beginning in 1968, the harvest limit in all units open to brown bear hunting was one bear every four regulatory years. Beginning in 1977, all hunters were required to purchase a tag before hunting a brown bear. However, in rural western Alaska, participation by subsistence users was very limited, and few subsistence harvests were reported through this system (Thornton 1992).

The issue of claw retention was examined extensively by the Brown Bear Claw Handicraft Working Group. The group was formed by the Federal Subsistence Board in 2009 to discuss a range of issues relating to brown bear claws including their use in handicrafts, the feasibility of tracking, and potential changes to regulations. Of particular concern to this group was preventing the illegal harvest and sale of brown bear parts that can garner significant monetary value in worldwide markets, and which may incentivize illegal harvest of brown bear populations elsewhere in North America where conservation concerns are prevalent. Brown bear claws, paws, and gall bladders are the primary illegal items sought for these markets (OSM 2010).

Sealing requirements help to track the sale of wildlife parts, to validate that an animal was legally harvested, and to provide documentation to allow individuals traveling to another country to obtain a CITES permit for the item to be legally transported across international borders (OSM 2010). For example, during Alaska Board of Game deliberations on Proposal 57 (sale of brown bear hides with claws attached and/or skulls, see Regulatory History, below) in March 2016, Alaska Wildlife Troopers testified that law enforcement tracks internet activity for hides and attempts to verify permit and sealing records when bear products are encountered. Very few brown bear hides had been encountered. At the time of the testimony, all bear hides sold by Alaska residents were appropriately harvested under a predation control permit. These permits are for the purpose of predation control to recover depleted prey populations such as moose and caribou (ADF&G 2023a).

Western/Northwestern Alaska Brown Bear Management Areas

In 1992, the Alaska Board of Game adopted the Western Alaska and Northwestern Alaska brown bear management areas and more liberal subsistence harvesting regulations. Brown bear subsistence harvest

seasons in most of these areas were lengthened to September 1–May 31, and harvest limits were increased to one brown bear every regulatory year. Under subsistence regulations, Alaska residents did not have to seal brown bears unless the hide or skull was being removed from the area or presented for commercial tanning. For brown bears, sealing means taking the skull and hide (with claws and evidence of sex attached) of the bear you killed to an officially designated "sealing officer." The skull must be skinned from the hide (*5 AAC 92.165 - Sealing of bear skins and skulls*). Hides and skulls are permanently marked by ADF&G (*5 AAC 92.990 – Definitions*).

An Alaska resident hunting in these management areas was required to have a State subsistence registration permit and to salvage the meat, but the hide and skull need not be salvaged. Over time the Alaska Board of Game has further modified these regulations. Currently, State subsistence registration hunts in which the hide and skull need not be sealed, unless removed from the area or presented for commercial tanning, occur in Unit 9B, all drainages in Unit 9E that drain into the Pacific Ocean between Cape Kumliun and the border of Unit 9D and Unit 9E, Unit 17, Unit 18, that portion of Units 19A and 19B downstream of and including the Aniak River drainage, Unit 21D, Unit 22, Unit 23, Unit 24, and Unit 26A (*5 AAC 92.165 Sealing of bear skins and skulls*).

Regulatory History

Customary Trade

In 1992, the Federal Subsistence Board adopted final Federal subsistence regulations in which it defined customary trade to be the following: "*Customary trade means cash sale of fish and wildlife resources regulated herein, not otherwise prohibited by Federal law or regulation, to support personal and family needs; and does not include trade which constitutes a significant commercial enterprise*" (*§___.4 Definitions*). The Board said it would continue to refine the definition of customary trade (57 Fed. Reg. 104, 22941 [May 29, 1992]). Customary trade is part of the definition of subsistence uses in Federal regulations.[2]

The Federal Subsistence Board's customary-trade focus has been refining regulations to address two issues on a region-by-region basis. One is the sale of salmon and the second is the sale of handicrafts that incorporate brown bear claws. The Board appointed working groups to propose regulations with input from Regional Advisory Councils. In 2003, the Board adopted regulations defining a significant commercial enterprise of salmon in some regions of the state and requiring a permit and reporting of customary trades of salmon in other regions of the state (*§___.27(b)(11)(i)* and *(ii)*; *§___.27(b)(12)*) and allowing the sale of handicrafts that incorporate brown bear claws in 2012 (*§___.25(j)(7)(ii)*). To allow the sale of handicrafts incorporating brown claws, a modification to the sealing certificate, which is managed by the State of Alaska, was required to include a place on the certificate indicating that the

[2] *Subsistence means the customary and traditional uses by rural Alaska residents of wild, renewable resources for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation; for the making and selling of handicraft articles out of nonedible byproducts of fish and wildlife resources taken for personal or family consumption; for barter, or sharing for personal or family consumption; and for* ***customary trade*** *(§___.4 Definitions)*

bear was harvested by a Federally qualified subsistence user (*§___.25(j) Utilization of fish, wildlife, or shellfish*, see regulations in the **Appendix**) (68 Fed. Reg. 81, 22309, [April 28, 2003]; 77 Fed. Reg. 114, 35498 [June 13, 2012]).

Sale of Brown Bear Hides

In 2002, Proposal WP02-01, submitted by a resident of Fort Yukon, requested the Federal Subsistence Board to classify black bears and brown bears as furbearers, which opened up the possibility that bear hides may be sold (*If you are a Federally qualified subsistence user, you may sell the raw fur or tanned pelt with or without claws attached from legally harvested furbearers (___25(j)(8)*).

Regional Advisory Councils differed in their recommendations. The Southeast Alaska Council was the only one that supported legalizing the sale of brown bear and black bear hides. The Southeast Alaska Council justification read,

> The Council was in favor of full use of subsistence resources and did not believe that allowing sale of bear parts would increase bear harvests, promote illegal trade, or cause conservations concerns. The Council noted that hunting regulations for bear limit the number of bears that can be taken and that sale of parts of legally taken bears would provide only a minor financial return to the harvester. There were no conservation concerns for the brown bear population under existing management; the southeast population is healthy, and fewer bears are taken than the harvest guideline would allow. This change in classification would not affect other users and could be positive for subsistence users (OSM 2002: 23).

One Council supported the sale of black bear pelts only, and five other Councils supported allowing the sale of only handcrafts that incorporate black bear fur (thereby aligning Federal and State regulations). One Council said the sale of bear parts could threaten bear populations and was not a customary and traditional use in the region. A Western Interior Alaska Council member abstained from voting on the proposal because of a cultural taboo that women do not talk about bears. Two Councils said that such decisions should be made on a region-by-region basis and not statewide (OSM 2002). The Board adopted a motion to only allow the sale of handicrafts incorporating black bear fur: *If you are a Federally qualified subsistence user, you may sell handicraft articles made from the skin, hide, pelt, or fur, including claws, of a black bear (§___.25(j)(6)*) (67 Fed. Reg. 125, 43711 [June 28, 2002]).

In 2006, the Alaska Board of Game adopted regulations to allow the sale of raw brown bear hides, with claws attached, harvested in specific predator control management areas under a State permit: "*After the skin and skull is sealed as required under 5 AAC 92.165(a), a person may sell the untanned skin, with claws attached, and skull of a brown bear taken in an active brown bear predator control area listed in 5 AAC 92.125 only under a permit issued by the department"* (*5 AAC 92.031(d)*). The purpose of predation control is to recover depleted prey populations such as moose and caribou (ADF&G 2006a, 2006b:5, 2023a).

In 2016, the Alaska Board of Game adopted Proposal 57 to allow the sale of brown bear hides and/or skulls by Alaska residents in units where the harvest limit is two bears annually: *A person may sell, advertise, or otherwise offer for sale a skull or hide with claws attached of a brown bear harvested in an area where the bag limit is two brown bears per regulatory year. . . .* (*5 AAC 92.031(g)*). Currently, these units with two-bear harvest limits in State regulations are 16B, 17, 19A, 19D, 20E, 21, 22A, 22B, 22D, 22E, 23, 24B, 25D, and 26A (*5 AAC 92.132 Bag limit for brown bears*) (ADF&G 2016a, 2016b:32, 2016c:5).

In 2018, the Federal Subsistence Board rejected the recommendations of affected Councils on Proposal WP18-44 to allow the sale of brown bear hides with claws attached and/or skulls in Unit 23. The Board said black markets for illegally acquired brown bear parts are known to encourage poaching and increasing market availability for brown bear parts may intensify illegal harvest. The Board also noted there is insufficient evidence that residents of Unit 23 have an established pattern of customary trade involving brown bear hides and skulls, and few residents of Unit 23 harvest brown bears under the Federal subsistence regulation due to meat salvage and sealing requirements. The lack of a component to the proposal that would require a permit for sale in line with State regulations was also a factor in the Board's justification for rejecting the proposal (OSM 2018).

Current General Regulations

Federal subsistence regulations prohibit the sale of wildlife or their parts unless specifically allowed under Federal subsistence regulations: "*You may not exchange in customary trade or sell fish or wildlife or their parts, taken pursuant to the regulations in this part, unless provided for in this part*" (*§___.7(b) Restriction on use*).

One specific authorization in Federal subsistence regulations for the sale of the non-edible byproducts of brown bears harvested for subsistence is for handicrafts: "*If you are a Federally qualified subsistence user, you may sell handicraft articles made from the skin, hide, pelt, or fur, including claws, of a brown bear taken from Units 1–5, 9A–C, 9E, 12, 17, 20, 22, 23, 24B (only that portion within Gates of the Arctic National Park), 25, or 26"* (*§___.23(j) Utilization of fish, wildlife, or shellfish*).

Federal subsistence regulations define a brown bear hide as having claws attached: *. . . skin, hide, or pelt of a bear shall mean the entire external covering with claws attached"* (*§___.23(a) Definitions*).

Additionally, customary trade shall not constitute a significant commercial enterprise: *Customary trade means exchange for cash of fish and wildlife resources regulated in this part, not otherwise prohibited by Federal law or regulation, to support personal and family needs; and does not include trade which constitutes a significant commercial enterprise* (§___*.4 Definitions*). Sales that rise to the level of a significant commercial enterprise are not defined on a statewide basis and instead may be defined on a region-by-region basis by placing monetary caps on sales and/or requiring permits for and reporting of customary trades (see examples of these regulations in the **Appendix** at *§___.27 Subsistence taking of fish*).

Biological Background

Brown bears on Kodiak Island are the only distinct subspecies (*Ursus arctos middendorffi)* because they are genetically and physically isolated from other Ursus arctos. However, all "grizzly bears" and "brown bears" are considered "brown bears" for purposes of harvest in Alaska.

Alaska has an estimated 30,000 brown bears statewide (ADF&G 2023b). Brown bears range throughout most of Alaska, except the islands of the Aleutian Chain west of Unimak and in Southeast Alaska south of Frederick Sound (**Figure 1**). High densities of brown bears occur on Kodiak Island, the Alaska Peninsula, and the Admiralty, Baranof, and Chichagof Islands of Southeast Alaska. The density of brown bears in Alaska varies considerably with habitat and ranges anywhere from 2.6 bears/ 1,000 km^2 on the North Slope (Lenart 2021) to 275 bears/1,000 km^2 in Southeast Alaska (Bethune 2021), although these estimates are extrapolated from an estimate derived from a reanalysis of 20-year-old data. Except for breeding pairs and females with offspring, brown bears are typically solitary creatures and avoid the company of other bears.

Figure 1. Map showing the range of brown bears in Alaska (ADF&G 2023c).

Brown bear populations are extremely sensitive to disruption. This is because brown bears exhibit the lowest reproduction rate of any North American mammal. In some areas with low population densities, such as in northern Alaska, brown bear populations are often managed conservatively for several reasons: large home ranges are required to meet resource needs (McLoughlin et al. 2002); female brown bears generally do not successfully reproduce until they are more than five years old and have low reproductive rates, small litters, and long intervals between litters. Sows exhibit high fidelity to home ranges with little emigration or immigration, and monitoring methods are imprecise and expensive (USFWS 1982, Reynolds 1989, Miller et al. 2011)

Brown bears are difficult to survey precisely due to their solitary nature and their sensitivity to disturbance, as is evident from the lack of current population data. Statewide, population estimates are sometimes based on surveys conducted in the 1990s or early 2000s and extrapolated to arrive at a current estimate. In Unit 4 in Southeast Alaska, there has not been a population estimate for brown bears for almost two decades (Bethune 2021). Historically, ADF&G estimated densities of between 227 and 275 bears/1000 km^2, with population estimated for Unit 4 of 4,303 bears. In Unit 13, there is currently no population monitoring (Hatcher 2023). The last population estimate was in 1998 and it estimated 1,260 bears in the unit, with a density of 21.3 bears/1,000 km^2. In Units 25 and 26 current population estimates are based on models using population data from 1999. These calculations give an estimated density of 2.6 bears/1,000 km^2, with a non-statistically derived estimate of 333 bears for Unit 26B (Lenart 2021).

Most population data collected is from sealing records of harvested brown bears. In some areas, brown bears harvested under Federal or State subsistence regulations are not required to be sealed except under certain conditions. Where sealing is not required, a Federal or a State hunting permit is required that sometimes allows for the collection of similar data to sealing records The data collected from each is used to assess trends in harvest and to inform in-season management actions (Bethune 2021).

Harvest History

Harvests levels of brown bears have generally increased over the last 40 years with harvest peaking in the early 2010s followed by a downward trend to the current year (ADF&G 2022).

Concerning the sale of the hides with claws attached of legally harvested brown bears in State regulations since 2016, ADF&G has not detected increased harvest. Although brown bear harvest increased slightly (then decreased right back to "normal" levels) when brown bears were first allowed to be taken over bait, hunting seasons were also being lengthened that might have contributed to this slight increase in harvest around the same time. Staff have been instructed to issue sale permits to anyone that harvests a brown bear in a two-bear harvest limit area that might possibly be interested in selling it down the road (Bogle 2023, pers. comm.; Weber 2023, pers. comm.). As of August 2022, ADF&G had distributed 38 sale permits for hunts across 10 subunits and has received seven sale notifications from permit holders (Paragi 2023, pers. comm.).

In addition to a State tag or permit, a Federal subsistence permit has been available in some areas of Alaska to harvest brown bears since 1995. In the 20 years from 2002 to 2021, 158 subsistence hunters

have reported harvesting a total of 40 brown bears by Federal permit cumulatively from Units 5, 8, 9, and in the Southcentral Alaska Region (OSM 2023). Subsistence hunters use these Federal permits because it allows them to hunt in areas where there is competition in the State system to obtain permits (for example draw hunts in Units 8), where there formerly was competition in the State system to obtain permits (for example in Unit 15), the hunt area is on National Park or Monument lands (such as in Unit 9), which are closed to the harvest of brown bears except by subsistence users, or in areas with more liberal Federal harvest limits (in Unit 5 for example).

Cultural Knowledge and Traditional Practices

Alaska Natives have harvested bears and competed with them for subsistence resources for at least 14,000 years (Birkedal 2001). Brown bears have traditionally been a very important part of the Alaska Native cultures. Because of their powerful senses and ability to hear through the ground, brown bears are usually referred to indirectly" and respectfully so that they will continue to give themselves to hunters. For this reason, the Yup'ik call them *carayak* (terrible fearsome thing), *ungungssiq* (land animal, quadruped), *naparngali* (one who stands upright) or *kavirluq* (red thing, as opposed to *tan'gerliq*, black bear)" (Fienup-Riordan 2007:164). Athabaskans call the brown bear *ghonoy*, *ghonoy tlaaga* or *dlil ta bahoolaanee*. Tlingits call it *yats'inEt* or *ya'Et'gu tutw'adi'at*. The Iñupiat call it *aklaq*.

Brown bears have been hunted for their meat and hides, and other parts of the bear have been used for traditional medicine or fashioned into such things as tools, amulets, ceremonial regalia, and art (Thornton 1992, Nelson 1983, Fall and Hutchinson-Scarborough1996, Loon and Georgette 1989, Behnke 1981, ADF&G 1990). Nelson (1983) reports that the brown bear takes an apex of power among Koyukon Athabascan spirits of the natural world, perhaps below only the wolverine. People's behavior toward the brown bear is subject to a number of culturally based requirements. Nelson (1983) reports that disregard or violation of these cultural requirements is sharply punished. Traditionally, when Koyukon men hunted brown bears, they followed prescribed rituals. For example, a man is not to openly discuss the brown bear hunt before or after it occurs, and care must be taken to prevent the hide from coming in contact with women. The Koyukon Athabascans have a taboo against women eating brown bear meat or young men eating meat from a brown bear's head (Nelson 1983). Dena'ina Athabascans in the Lake Clark and Katmai areas competed directly with brown bears for subsistence resources; it is thought that the Dena'ina likely displaced brown bear from the very best salmon fishing sites on certain rivers (Birkedal 2001). The Dena'ina reserved some secondary stream drainages for the exclusive use of bears and for bear hunting. It is reported that Alutiiq residents of the Alaska Peninsula believed that bears are human ancestors that must be shown respect (Sherwonit 1998). In the Chignik Bay, Chignik Lagoon, Chignik Lake, Ivanof Bay and Perryville area, brown bear hunting is governed by a system of traditional Alutiiq beliefs that emphasize respectful treatment of the bear and protection of the hunters (Fall and Hutchinson-Scarborough 1996). According to these traditions, the skull and hide of the bear are left at the kill site; the skull is placed facing in a southern or southeastern direction. Traditional Southeast Alaska, brown bear hunting by Alaska Natives was surrounded by numerous behavioral prescriptions that were considered vital to the success of the hunt. Brown bears are an important symbol of Tlingit social and ceremonial life, and there is emphasis on the close relationship

between humans and bears (Thornton 1992). Bear hides were used for ceremonial robes, clothing, rugs and bedding. Thornton (1992) reported that the Tlingit traditionally preferred brown bear hides for children's bedding, as the hides provided not only warmth, but also were thought to prevent illnesses. Loon and Georgette (1989) and Georgette (2001) described the widespread respect of the Iñupiat for bears and the belief that the bears must be treated appropriately. An Iñupiat man is not to openly discuss the bear hunt before or after it occurs. Traditionally, the bear's head is given to the eldest member of the community or hung on a tree or pole in camp. The Iñupiat give the bear hide to an elder or use it for bedding and clothing. It has been customary practice of some Yup'ik villagers to use bear hides for mattresses, trimming on clothing and skin for boats and to bury the bear's skull facing east at the kill site. Brown bear harvesting is a specialized pursuit that is concentrated in certain villages and certain families (Coffing 1991).

Effects of the Proposal

If Proposal WP23-01 is adopted, the sale of the hide of a brown bear legally harvested from Federal public lands under Federal regulations will be legal as long as the edible meat is salvaged for human consumption, claws are attached to the hide, and the hide is sealed by a representative of ADF&G.

However, this outcome might conflict with CITES and State regulations implementing CITES. CITES provides for the commercial trade of hides of legally harvested brown bears only if the state of export issues permits reporting that the trade will not be detrimental to the survival of the species in the wild. The State of Alaska currently issues these permits but only for the sale of the hides of brown bears legally harvested in areas with a two-brown bear harvest limit (in Units 16B, 17, 19A, 19D, 20E, 21, 22A, 22B, 22D, 22E, 23, 24B, 25D, and 26A).

It is already legal under State regulations to sell the hide of brown bears legally harvested in areas of Alaska where the harvest limit is two brown bears per year except for lands designated as National Park or Monument, which are only open to hunting under Federal subsistence regulations. Effects on nonsubsistence users are not anticipated. Effects on the resource, specifically whether, or how much, the harvest of brown bears will increase is anticipated to be minimal.

If Proposal WP23-01 is not adopted, the sale of brown bear hides will not be legal under Federal regulations but will remain legal in areas of Alaska under State regulations where the harvest limit is two brown bears per year including on most Federal public lands, except for lands designated as National Park or Monument. No effects on nonsubsistence users or the resource are anticipated.

OSM PRELIMINARY CONCLUSION

Support Proposal WP24-01 **with modification** to allow the sale of brown bear hides with claws attached in areas where the Federal harvest limit is two bears every regulatory year and after first obtaining a permit available at the time of sealing from an ADF&G sealing officer.

The modified regulation should read:

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

(j) Utilization of fish, wildlife, or shellfish

. . .

(13) You may sell the raw/untanned and tanned hide or cape from a legally harvested caribou, deer, elk, goat, moose, musk ox, sheep, ***and brown bear with claws attached harvested in an area with a two brown bear limit per regulatory year* in Federal regulations only after first obtaining a permit* at the time of sealing from the Alaska Department of Fish and Game.***

***Note**: Harvest limits of two brown bears per regulatory year in 2022/24 Federal regulations include all or portions of Units 22B, 22D, 23, 24B, 25D, and 26A. A "Permit to Sell a Brown/Grizzly Bear Hide and/or Skull" is available at the time of sealing from the sealing officer.

Justification

Conservation is a concern regarding brown bear populations in Alaska for several reasons including their low productivity rates, their solitary nature, difficulty obtaining population estimates, and high sport use in some areas. The OSM modification to the proposal puts limits on sales of brown bear hides. The sale of brown bear hides could only occur for brown bears shown to be legally harvested from Federal public lands under Federal regulations, and only in areas where there is a two brown bear harvest limit in Federal regulations. Currently, such areas are all or portions of Units 22B, 22D, 23, 24B, 25D, and 26A. Further, the edible meat must be salvaged (*§___.25(j)(2)(ii)*), the hide must have the claws attached (*§___.25(a)*), and the hide must be sealed by ADF&G before it can be removed from the area (*§___.26(j)*).

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) provides for the commercial trade of hides of legally harvested brown bears only if the state of export issues permits reporting that the trade will not be detrimental to the survival of the species in the wild. Therefore, a permit from ADF&G is required. The Alaska Department of Fish and Game issues this type of permit before selling the hide of a brown bear legally harvested under State regulations but only in areas with a two brown bear harvest limit (in Units 16B, 17, 19A, 19D, 20E, 21, 22A, 22B, 22D, 22E, 23, 24B, 25D, and 26A). Allowing the sale of the hide of a brown bear harvested from other areas would require negotiation with the State over the use of its permitting system.

These requirements would limit from where and how many hides would be sold by federally qualified subsistence users. Limiting legal sales to only brown bears taken from areas with two-bear harvest limits would be a protection from over harvest. Other tools exist for the Board to use if harvests were to rise above sustainable yields in an area. These tools include reducing seasons and harvest limits, placing monetary caps on sales on a region-by-region bases, and requiring permits for and reporting of customary trades.

This is a statewide proposal that will be reviewed by all 10 Regional Advisory Councils. Each Council can inform the Board whether the regulation is culturally appropriate for their region.

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Appendix

Relevant Federal Regulations

§___.4 Definitions

The following definitions apply to all regulations contained in this part:

. . .

Customary trade *means exchange for cash of fish and wildlife resources regulated in this part, not otherwise prohibited by Federal law or regulation, to support personal and family needs; and does not include trade which constitutes a significant commercial enterprise.*

. . .

Subsistence *means the customary and traditional uses by rural Alaska residents of wild, renewable resources for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation; for the making and selling of handicraft articles out of nonedible byproducts of fish and wildlife resources taken for personal or family consumption; for barter, or sharing for personal or family consumption; and for customary trade.*

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

(a) Definitions

. . .

Bear *means black bear, or brown or grizzly bear*

. . .

Big game *means black bear, brown bear, bison, caribou, Sitka black-tailed deer, elk, mountain goat, moose, musk ox, Dall sheep, wolf, and wolverine.*

. . .

Edible meat *means . . For black bear, brown and grizzly bear, "edible meat" means the meat of the front quarter and hindquarters and meat along the backbone (backstrap).*

. . .

Handicraft *means a finished product made by a rural Alaskan resident from the nonedible byproducts of fish or wildlife and is composed wholly or in some significant respect of natural materials. The shape and appearance of the natural material must be substantially changed by the skillful use of hands, such as sewing, weaving, drilling, lacing, beading, carving, etching, scrimshawing, painting, or other means, and incorporated into a work of art, regalia, clothing, or other creative expression, and can be either traditional or contemporary in design. The handicraft must have substantially greater monetary and aesthetic value than the unaltered natural material alone.*

. . .

Sealing *means placing a mark or tag on a portion of a harvested animal by an authorized representative of the ADF&G; sealing includes collecting and recording information about the conditions under which the animal was harvested, and measurements of the specimen submitted for sealing, or surrendering a specific portion of the animal for biological information.*

. . .

Skin, hide, pelt, or fur *means any tanned or untanned external covering of an animal's body. However, for bear, the skin, hide, pelt, or fur means the external covering with claws attached.*

. . .

Trophy means *a mount of a big game animal, including the skin of the head (cape) or the entire skin, in a lifelike representation of the animal, including a lifelike representation made from any part of a big game animal; "trophy" also includes a "European mount" in which the horns or antlers and the skull or a portion of the skull are mounted for display*

. . .

(j) Utilization of fish, wildlife, or shellfish.

. . .

(2) If you take wildlife for subsistence, you must salvage the following parts for human use:

. . .

(ii) The hide and edible meat of a brown bear, except that the hide of brown bears taken in Units 5, 9B, 17, 18, portions of 19A and 19B, 21D, 22, 23, 24, and 26A need not be salvaged;

. . .

(7) If you are a Federally qualified subsistence user, you may sell handicraft articles made from the skin, hide, pelt, or fur, including claws, of a brown bear taken from Units 1–5, 9A–C, 9E, 12, 17, 20, 22, 23, 24B (only that portion within Gates of the Arctic National Park), 25, or 26.

(i) In Units 1, 2, 3, 4, and 5, you may sell handicraft articles made from the skin, hide, pelt, fur, claws, bones, teeth, sinew, or skulls of a brown bear taken from Units 1, 4, or 5.

(ii) Prior to selling a handicraft incorporating a brown bear claw(s), the hide or claw(s) not attached to a hide must be sealed by an authorized Alaska Department of Fish and Game representative. Old claws may be sealed if an affidavit is signed indicating that the claws came from a brown bear harvested on Federal public lands by a Federally qualified user. A copy of the Alaska Department of Fish and Game sealing certificate must accompany the handicraft when sold.

. . .

(13) You may sell the raw/untanned and tanned hide or cape from a legally harvested caribou, deer, elk, goat, moose, musk ox, and sheep.

§___.27 Subsistence taking of fish.

. . .
(b) Methods, means, and general restrictions.

. . .
(11) Transactions between rural residents. Rural residents may exchange in customary trade subsistence-harvested fish, their parts, or their eggs, legally taken under the regulations in this part, for cash from other rural residents. The Board may recognize regional differences and regulates customary trade differently for separate regions of the State.

(i) Bristol Bay Fishery Management Area—The total cash value per household of salmon taken within Federal jurisdiction in the Bristol Bay Fishery Management Area and exchanged in customary trade to rural residents may not exceed $500.00 annually.

(ii) Upper Copper River District—The total number of salmon per household taken within the Upper Copper River District and exchanged in customary trade to rural residents may not exceed 50 percent of the annual harvest of salmon by the household. No more than 50 percent of the annual household limit may be sold under paragraphs (b)(11) and (12) of this section when taken together. These customary trade sales must be immediately recorded on a customary trade recordkeeping form. The recording requirement and the responsibility to ensure the household limit is not exceeded rests with the seller.

(iii) Customary trade of Yukon River Chinook salmon may only occur between Federally qualified rural residents with a current customary and traditional use determination for Yukon River Chinook salmon.

(12) Transactions between a rural resident and others. In customary trade, a rural resident may exchange fish, their parts, or their eggs, legally taken under the regulations in this part, for cash from individuals other than rural residents if the individual who purchases the fish, their parts, or their eggs uses them for personal or family consumption. If you are not a rural resident, you may not sell fish, their parts, or their eggs taken under the regulations in this part. The Board may recognize regional differences and regulates customary trade differently for separate regions of the State.

(i) Bristol Bay Fishery Management Area—The total cash value per household of salmon taken within Federal jurisdiction in the Bristol Bay Fishery Management Area and exchanged in customary trade between rural residents and individuals other than rural residents may not exceed $400.00 annually. These customary trade sales must be

immediately recorded on a customary trade recordkeeping form. The recording requirement and the responsibility to ensure the household limit is not exceeded rest with the seller.

(ii) Upper Copper River District—The total cash value of salmon per household taken within the Upper Copper River District and exchanged in customary trade between rural residents and individuals other than rural residents may not exceed $500.00 annually. No more than 50 percent of the annual household limit may be sold under paragraphs (b)(11) and (12) of this section when taken together. These customary trade sales must be immediately recorded on a customary trade recordkeeping form. The recording requirement and the responsibility to ensure the household limit is not exceeded rest with the seller.

(iii) Customary trade of Yukon River Chinook salmon may only occur between Federally qualified rural residents with a current customary and traditional use determination for Yukon River Chinook salmon.

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WP24 07 Executive Summary	
General Description	Proposal WP24-07 requests clarification of Federal trapping regulations that exempt Federally qualified subsistence users from Municipality of Anchorage trapping closures on Federal public lands in Units 7 and 14C. *Submitted by: Tom Lessard of Cooper Landing*
Proposed Regulation	*§100.26(n)(7)(iii)(**B**) & §100.26(n)(14)(iii)(**A**)* ***Federally qualified subsistence users trapping under these regulations are exempt from Municipality of Anchorage Ordinance AO 2019-050(S) while on Federal public lands which are open to trapping**.*
OSM Preliminary Conclusion	**Oppose** Proposal WP24-07.
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	
Yukon-Kuskokwim Delta Subsistence Regional	

WP24 07 Executive Summary	
Advisory Council Recommendation	
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Northwest Arctic Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
North Slope Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None

DRAFT STAFF ANALYSIS
WP24-07

ISSUES

Wildlife Proposal WP24-07, submitted by Tom Lessard of Cooper Landing, requests clarification of Federal trapping regulations that exempt Federally qualified subsistence users from Municipality of Anchorage trapping closures on Federal public lands in Units 7 and 14C.

DISCUSSION

The proponent states that Municipality of Anchorage Ordinance Number 2019-50(S) prohibits otherwise legal Federal subsistence trapping on Federal public lands within the Municipality of Anchorage in the Turnagain Arm and Portage Valley areas. The Anchorage Assembly created "Prohibited Trapping Zones" for safe trails within 50 yards of developed trails, excluding off-shoots; and within one-quarter mile of established trailheads, campgrounds, and permanent dwellings. The proponent states that the Municipal ordinance prohibits trapping, punishable by fines, on approximately 20 square miles within Portage Valley, which is mostly Federal public land.

Existing Federal Regulation

None

Proposed Federal Regulation

*§100.26(n)(7)(iii)(**B**) & §100.26(n)(14)(iii)(**A**)*

Federally qualified subsistence users trapping under these regulations are exempt from Municipality of Anchorage Ordinance AO 2019-050(S) while on Federal public lands which are open to trapping.

Existing State Regulation

5 AAC 92.510 Areas Closed to Trapping

(3) Unit 14(C) (Anchorage Area):

(A) the drainages into Eklutna River and Eklutna Lake, within Chugach State Park except Thunderbird Creek and those drainages flowing into the East Fork of the Eklutna River upstream from the bridge above the lake;

(B) the Eagle River Management Area;

(C) that portion of Chugach State Park outside of the Eagle River, Anchorage, and Eklutna management areas is open to trapping under Unit 14(C) seasons and bag limits, except that trapping of wolf, wolverine, land otter, and beaver is not allowed; killer style steel traps with an inside jaw spread seven inches or greater are prohibited; a person using traps or snares in the area must register with the Department of Natural Resources Chugach State Park area office and provide a trapper identification; all traps and snares in the area must be marked with the selected identification; the use of traps or snares is prohibited within

(i) 50 yards of developed trails;

(ii) one-quarter mile of trailheads, campground, and permanent dwellings;

(iii) repealed 7/1/2009;

(D) all land and water within the Anchorage Management Area as described in 5 AAC 92.530(3);

(E) in the Anchorage Coastal Wildlife Refuge in Unit 14(C), described in AS 16.20.031: all land and water south and west of and adjacent to the toe of the bluff that extends from Point Woronzof southeasterly to Potter Creek;

(F) the Joint Base Elmendorf-Richardson (JBER) Management Area, except for beaver, muskrat, mink, weasel, marten, otter, fox, and coyote in areas designated by the commander;

Extent of Federal Public Lands/Waters

Unit 7 is comprised of 77% Federal public lands and consists of 52% U.S. Forest Service (USFS) managed lands, 23% National Park Service (NPS) managed lands, and 2% U.S. Fish and Wildlife Service (USFWS) managed lands.

Unit 14C is comprised of 16% Federal public lands and consists of 11% USFS managed lands and 5% Bureau of Land Management (BLM) managed lands.

Customary and Traditional Use Determinations

The Federal Subsistence Board (Board) has not made a customary and traditional use determination for furbearers in Units 7 and 14C. Therefore, all rural residents of Alaska may harvest furbearers in these units.

Regulatory History

In 2014, the Board rejected Proposal WP14-01, which requested Federal regulations requiring trapper identification tags on all traps and snares, the establishment of a maximum allowable time limit for checking traps, and establishment of a harvest/trapping report form to collect data on non-target species captured. The proposal analysis indicated statewide application would be unmanageable, would require substantial law enforcement and public education efforts, and could cause subsistence users to avoid the regulation by trapping under State regulations. The proposal was unanimously opposed by all ten Federal Subsistence Regional Advisory Councils, Alaska Department of Fish and Game (ADF&G), and the public as reflected in written public comments.

In 2015, the Alaska Board of Game (BOG) considered Proposal 180, to prohibit trapping within 250 feet of most public roads and trails in the Cooper Landing Area. They opposed the proposal, stating trappers and local residents need to work together to find a solution or compromise upon which all users can agree. BOG members also noted concerns about the enforceability of the proposal and loss of trapping opportunity by requiring trappers to travel 250 feet off trail and back to set and check traps (ADF&G 2015).

In 2016, the BOG considered Proposal 80, to restrict trapping in and around cities with populations over 1,000 people. Specifically, trapping within one-quarter mile of publicly maintained roads, 200 feet of publicly maintained trails, and one mile of permanent dwellings, schools, businesses, and campgrounds would be prohibited. ADF&G stated that proposals restricting trapping should be addressed at regional rather than statewide BOG meetings, so affected local communities can comment. ADF&G also referred to State regulations that limit trapping in management areas. The BOG opposed the proposal due to opposition by 26 Fish and Game Advisory Committees and concern for unintended consequences. The BOG also commented that these types of restrictions could be better handled through city or borough ordinances (ADF&G 2016).

In 2019, the Anchorage assembly passed Municipal ordinance AL No. 2019-50(S), which made it illegal to trap within a prohibited trapping zone. This ordinance established prohibited trapping zones within the Municipality of Anchorage boundaries on public lands owned by the municipality and any land within 50 yards of developed trails and one-quarter mile of trailheads, campgrounds, and permanent dwellings. It also required anyone trapping within the municipal boundary to mark each trap with trapper identification number or contact information of trapper. The Anchorage assembly passed this ordinance for the safety of trail users and pets in Anchorage (MOA 2019).

In 2020, Proposal WP20-20, submitted by Robert Gieringer, requested that hunting and trapping in Unit 7 be prohibited within one mile of roads and trails and that traps be marked with brightly colored tape. This proposal was on the consensus agenda but was removed at the Board meeting by request from a member of the public. The Board rejected the proposal. The Board stated Federal regulations would be more restrictive than State regulations, violating the rural subsistence priority mandated by the Alaska National Interest Land Conservation Act (ANILCA). Furthermore, all users would still be able to hunt and trap without restrictions under State regulations, decreasing the proposal's

effectiveness and increasing user confusion. The Board also stated marking traps with brightly colored tape could result in attracting more people to the trap and possibly pets (FSB 2020).

In March 2022, the BOG considered deferred Proposal 199 at their 2022 Statewide Regulations meeting. Proposal 199 requested 50-yard setbacks along certain multi-use trails and trailheads in Units 13, 14, and 16. This proposal was deferred from the January 2022 BOG meeting so a workshop could be held to reach a compromise on the proposal. The BOG attempted to modify the proposal several times with different amendments, including language created from the workshop. All versions of this proposal were rejected.

In April 2022, the Board considered Proposal WP22-15, submitted by the Cooper Landing Community Safe Trails Committee, requesting setbacks of 1,000 feet on both sides of certain trails; 1,000-foot setbacks on certain roads; and trapping moratoriums in campgrounds plus 1,000-foot setbacks around certain campgrounds. The Southcentral Alaska Subsistence Regional Advisory Council, ADF&G, Interagency Staff Committee and Office of Subsistence Management were all in opposition to this proposal due to potential of lost subsistence opportunity and regulatory confusion. While this proposal received 25 written public comments in support of the action, the Board rejected this proposal on the consensus agenda.

In March 2023, at the Southcentral Region BOG meeting in Soldotna, the BOG considered numerous trap setback proposals. Proposals 145–153 included trap setbacks at various locations throughout Units 7 and 15. While most of these proposals did not pass, three were adopted by the BOG. Amended Proposal 145 made it illegal to hunt and trap within one-quarter mile of wildlife crossings along the Sterling Highway. Amended Proposals 146 and 149 established trap setbacks along certain trails within Kachemak Bay State Park and along the perimeter of campgrounds in Unit 7, respectively. Setback distance was set at 50 yards unless the trap was elevated at least 3 feet above the ground, under water, under ice, or enclosed.

Effects of the Proposal

If this proposal is adopted, clarification would be provided in codified Federal regulations that federally qualified subsistence users trapping under Federal regulations on Federal public lands in Units 7 and 14C are exempt from the trapping closures established by the Municipality of Anchorage Ordinance AO 2019-050(S). Functionally, this would have no effect on subsistence users or wildlife populations as State and municipal regulations do not apply to federally qualified subsistence users taking fish or wildlife on Federal public lands under Federal regulations. However, adoption of this proposal could reduce user confusion by explicitly clarifying this exemption.

OSM PRELIMINARY CONCLUSION

Oppose Proposal WP24-07.

Justification

OSM opposes this proposal because the ordinance passed by the Anchorage assembly does not apply to federally managed lands. Therefore, federally qualified subsistence users trapping under Federal regulations are currently exempt from this ordinance.

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FISHERIES RESOURCE MONITORING PROGRAM

INTRODUCTION

The Fisheries Resource Monitoring Program (Monitoring Program) is a collaborative, interagency, interdisciplinary approach to enhance fisheries research and data in Alaska and effectively communicate information needed for subsistence fisheries management on Federal public lands and waters. In 1999, the Federal government assumed responsibility for management of subsistence fisheries on Federal public lands and waters in Alaska. Section 812 of the Alaska National Interest Lands Conservation Act (ANILCA) directs the Departments of the Interior and Agriculture to research fish and wildlife subsistence uses on Federal public lands and waters and to seek data from, consult with, and incorporate knowledge of rural residents engaged in subsistence. The Secretaries of the Interior and Agriculture are committed to increasing the quantity and quality of information available to manage subsistence fisheries; meaningful involvement by federally-recognized tribes and Alaska Native and rural organizations; and, collaboration among Federal, State, Alaska Native, and rural organizations.

Every two years, the Office of Subsistence Management announces a notice of funding opportunity for investigation plans addressing subsistence fisheries on Federal public lands. The Monitoring Program is administered through regions to align with stock, harvest, and community issues common to a geographic area. There are six distinct Monitoring Program regions (**Figure 1**) as well as a multi-region category for projects that encompass more than one region.

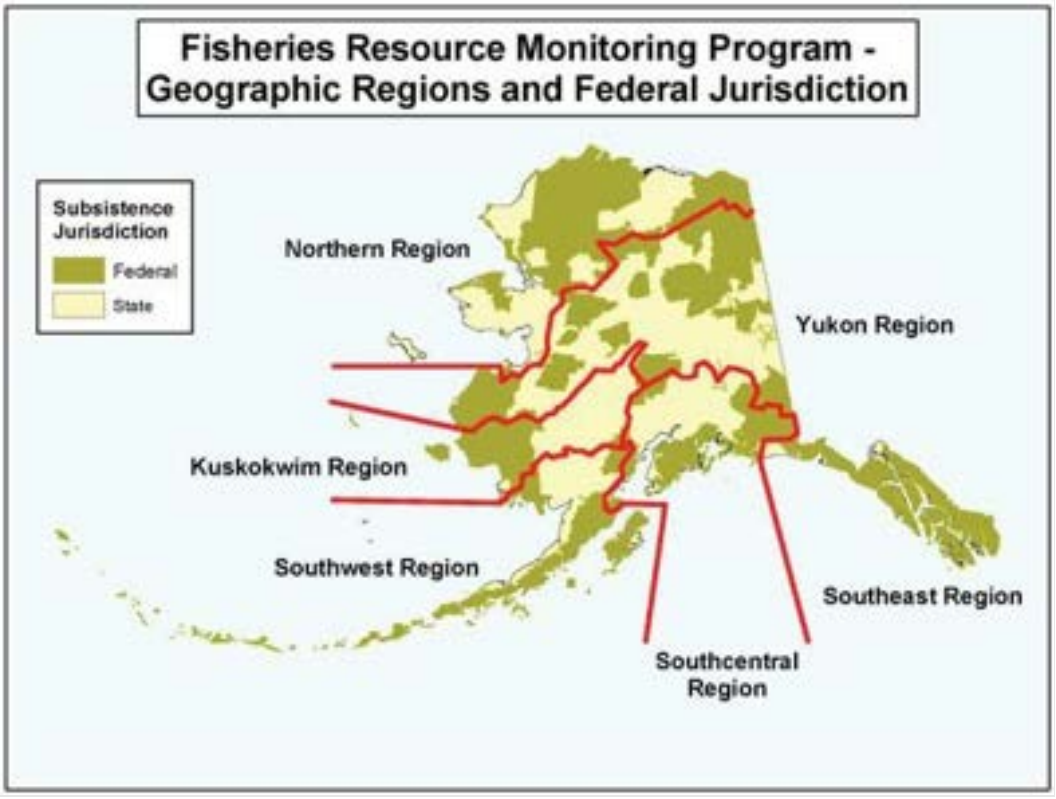

Figure 1. Geographic regions of the Fisheries Resource Monitoring Program in Alaska.

During each two-year funding cycle, the Monitoring Program funds ongoing projects from the previous cycle (projects may be 1–4 years in duration) as well as new projects. Funding allocation guidelines are established by geographic region (**Table 1**). The regional guidelines were developed using six criteria that included level of risk to species, level of threat to conservation units, amount of subsistence needs not being met, amount of information available to support subsistence management, importance of a species to subsistence harvest, and level of user concerns regarding subsistence harvest. Funding allocation guidelines provide an initial target for planning; however, they are not final and are adjusted annually as needed.

Table 1. Regional allocation guideline for Fisheries Resource Monitoring Program Funds.

Region	U.S. Department of the Interior Funds	U.S. Department of Agriculture Funds
Northern Alaska	17%	0%
Yukon Drainage	29%	0%
Kuskokwim Drainage	29%	0%
Southwest Alaska	15%	0%
Southcentral Alaska	5%	33%
Southeast Alaska	0%	67%
Multi-Regional	5%	0%

The Monitoring Program was first implemented in 2000 with an initial allocation of $5 million. Since 2000, a total of $139.9 million has been allocated for the Monitoring Program to fund a total of 524 projects (**Figure 2** and **Figure 3**).

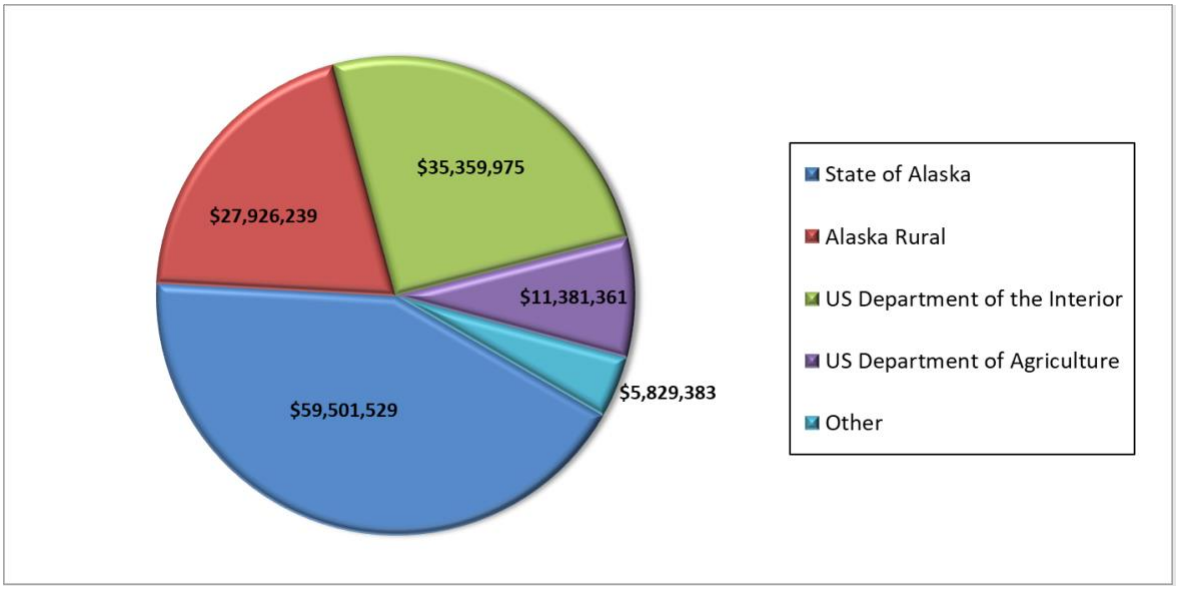

Figure 2. Monitoring Program fund distribution since 2000, identified by primary recipient organization type.

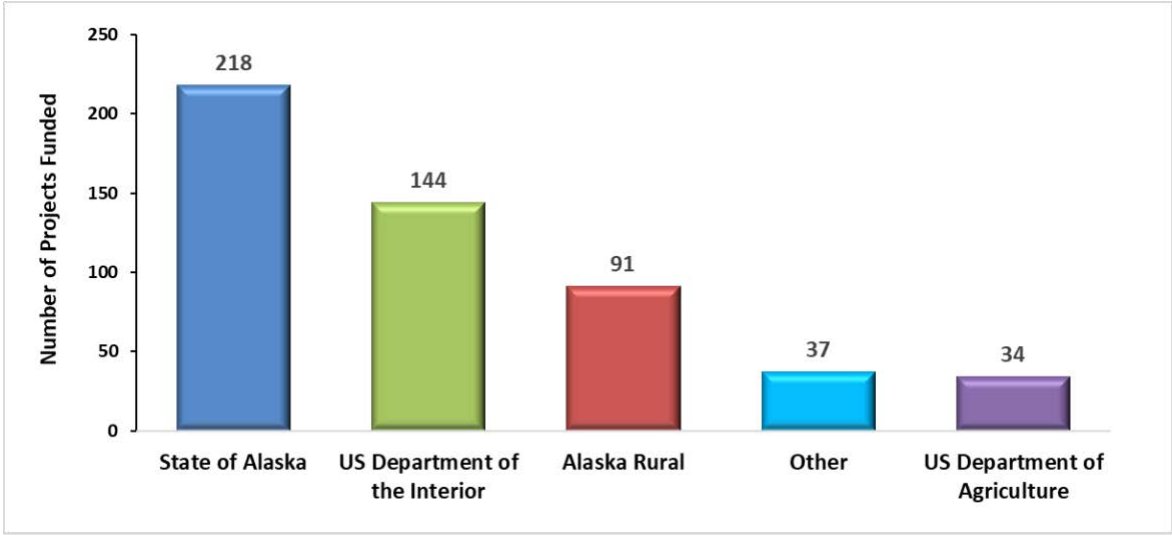

Figure 3. Number of Monitoring Program projects funded since 2000, listed by primary recipient organization type.

The three broad categories of information solicited by the Monitoring Program are (1) harvest monitoring, (2) traditional ecological knowledge, and (3) stock status and trends. Projects that combine these approaches are encouraged.

Harvest monitoring studies provide information on numbers and species of fish harvested, locations of harvests, and gear types used. Methods used to gather information on subsistence harvest patterns may include harvest calendars, mail-in questionnaires, household interviews, subsistence permit reports, and telephone interviews.

Traditional ecological knowledge studies are investigations of local knowledge directed at collecting and analyzing information on a variety of topics such as the sociocultural aspects of subsistence, fish ecology, species identification, local names, life history, taxonomy, seasonal movements, harvests, spawning and rearing areas, population trends, environmental observations, and traditional management systems. Methods used to document traditional ecological knowledge include ethnographic fieldwork, key respondent interviews with local experts, place name mapping, and open-ended surveys.

Stock status and trends studies provide information on abundance and run timing, age-sex-length composition, migration and geographic distribution, survival of juveniles or adults, stock production, genetic stock identification, and mixed stock analyses. Methods used to gather information on stock status and trends include aerial and ground surveys, test fishing, towers, weirs, sonar, video, genetics, mark-recapture, and telemetry.

PROJECT EVALUATION PROCESS

The Monitoring Program prioritizes high quality projects that address critical subsistence and conservation concerns. Projects are selected for funding through an evaluation and review process that is designed to advance projects that are strategically important for the Federal Subsistence Management Program, technically sound, administratively competent, promote partnerships and capacity building, and

are cost effective. Proposed projects are first evaluated by a panel called the Technical Review Committee. The Technical Review Committee's function is to provide evaluation, technical oversight, and strategic direction to the Monitoring Program. This committee is a standing interagency committee of senior technical experts that reviews, evaluates, and makes recommendations about proposed projects that are consistent with the mission of the Monitoring Program. Recommendations from the Technical Review Committee provide the basis for further comments from Subsistence Regional Advisory Councils, the public, the Interagency Staff Committee, and the Federal Subsistence Board, with final approval of the Monitoring Plan by the Assistant Regional Director of the Office of Subsistence Management.

To be considered for funding under the Monitoring Program, a proposed project must have a nexus to Federal subsistence fishery management. Proposed projects must have a direct association to a Federal subsistence fishery, and the subsistence fishery or fish stocks in question must occur in or pass-through waters within or adjacent to Federal public lands in Alaska (National Wildlife Refuges, National Forests, National Parks and Preserves, National Conservation Areas, National Wild and Scenic River Systems, National Petroleum Reserves, and National Recreation Areas). A complete project package must be submitted on time and must address the following five specific criteria.

1. ***Strategic Priorities***—Studies should be responsive to information needs identified in the 2024 Priority Information Needs available at the Monitoring Program webpage at https://www.doi.gov/subsistence/frmp/funding. All projects must have a direct linkage to Federal public lands and/or waters to be eligible for funding under the Monitoring Program. Projects should address the following topics to demonstrate links to strategic priorities:

    - Federal jurisdiction—The extent of Federal public waters in or nearby the project area
    - Direct subsistence fisheries management implications
    - Conservation mandate—Threat or risk to conservation of species and populations that support subsistence fisheries
    - Potential impacts on the subsistence priority—Risk that subsistence harvest users' goals will not be met
    - Data gaps—Amount of information available to support subsistence management and how a project answers specific questions related to these gaps
    - Role of the resource—Contribution of a species to a subsistence harvest (number of villages affected, pounds of fish harvested, miles of river) and qualitative significance (cultural value, unique seasonal role)
    - Local concern—Level of user concerns over subsistence harvests (upstream vs. downstream allocation, effects of recreational use, changes in fish abundance and population characteristics)

    To assist in evaluation of submittals for projects previously funded under the Monitoring Program, investigators must summarize project findings in their investigation plans. This

summary should clearly and concisely document project performance, key findings, and uses of collected information for Federal subsistence management. It should also justify the continuation of the project, placing the proposed work in context with the ongoing work being accomplished.

2. ***Technical-Scientific Merit***—Technical quality of the study design must meet accepted standards for information collection, compilation, analysis, and reporting. To demonstrate technical and scientific merit, applicants should describe how projects will:

    - Advance science
    - Answer immediate subsistence management or conservation concerns
    - Have rigorous sampling and/or research designs
    - Have specific, measurable, realistic, clearly stated, and achievable (attainable within the proposed project period) objectives
    - Incorporate traditional knowledge and methods

    Data collection, compilation, analysis, and reporting procedures should be clearly stated. Analytical procedures should be understandable to the non-scientific community.

3. ***Investigator Ability and Resources***—Investigators must show they are capable of successfully completing the proposed project by providing information on the ability (training, education, experience, and letters of support) and resources (technical and administrative) they possess to conduct the work. Investigators that have received funding in the past, via the Monitoring Program or other sources, are evaluated and scored on their past performance, including fulfillment of meeting deliverable and financial accountability deadlines. A record of failure to submit reports or delinquent submittal of reports will be considered when rating investigator ability and resources.

4. ***Partnership and Capacity Building***—Investigators must demonstrate that capacity building has already reached the communication or partnership development stage during proposal development and, ideally, include a strategy to develop capacity building to higher levels, recognizing, however, that in some situations higher level involvement may not be desired or feasible by local organizations.

    Investigators are requested to include a strategy for integrating local capacity development in their study plans or research designs. Investigators should inform communities and regional organizations in the area where work is to be conducted about their project plans. They should also consult and communicate with local communities to ensure that local knowledge is used and concerns are addressed. Investigators and their organizations should demonstrate their ability to maintain effective local relationships and commitment to capacity building. This includes a plan to facilitate and develop partnerships so that investigators, communities, and regional organizations can pursue and achieve the most meaningful level of involvement. Proposals

demonstrating multiple, highly collaborative efforts with rural community members or Alaska Native Organizations are encouraged.

Successful capacity building requires developing trust and dialogue among investigators, local communities, and regional organizations. Investigators need to be flexible in modifying their work plan in response to local knowledge, issues, and concerns, and must also understand that capacity building is a reciprocal process in which all participants share and gain valuable knowledge. The reciprocal nature of the capacity building component(s) should be clearly demonstrated in proposals. Investigators are encouraged to develop the highest level of community and regional collaboration that is practical including joining as co-investigators.

Capacity can be built by increasing the technical capabilities of rural communities and Alaska Native organizations. This can be accomplished via several methods, including increased technical experience for individuals and the acquisition of necessary gear and equipment. Increased technical experience would include all areas of project management including logistics, financial accountability, implementation, and administration. Other examples may include internships or providing opportunities within the project for outreach, modeling, sampling design, or project specific training. Another would be the acquisition of equipment that could be transferred to rural communities and tribal organizations upon the conclusion of the project.

A "meaningful partner" is a partner that is actively engaged in one or more aspects of project design, logistics, implementation, and reporting requirements. Someone who simply agrees with the concept or provides a cursory look at the proposal is not a meaningful partner.

5. ***Cost/Benefit*—**This criterion evaluates the reasonableness (what a prudent person would pay) of the funding requested to provide benefits to the Federal Subsistence Management Program. Benefits could be tangible or intangible. Examples of tangible outcomes include data sets that directly inform management decisions or fill knowledge gaps and opportunities for youth or local resident involvement in monitoring, research, and/or resource management efforts. Examples of possible intangible goals and objectives include enhanced relationships and communications between managers and communities, partnerships and collaborations on critical resource issues, and potential for increased capacity within both communities and agencies.

   Applicants should be aware that the Government shall perform a "best value analysis" and the selection for award shall be made to the applicant whose proposal is most advantageous to the Government. The Office of Subsistence Management strives to maximize program efficiency by encouraging cost sharing, partnerships, and collaboration.

POLICY AND FUNDING GUIDELINES

Several policies have been developed to aid in implementing funding. These policies include:

- Projects of up to four years in duration may be considered

- Proposals requesting Monitoring Program funding that exceeds $235,000 in any one year are not eligible for funding
- Studies must not duplicate existing projects
- Long term projects will be considered on a case-by-case basis

Activities that are not eligible for funding include:

- Habitat protection, mitigation, restoration, and enhancement
- Hatchery propagation, restoration, enhancement, and supplementation
- Contaminant assessment, evaluation, and monitoring
- Projects where the primary or only objective is outreach and education (for example, science camps, technician training, and intern programs), rather than information collection

The rationale behind these policy and funding guidelines is to ensure that existing responsibilities and efforts by government agencies are not duplicated under the Monitoring Program. Land management or regulatory agencies already have direct responsibility, as well as specific programs, to address these activities. However, the Monitoring Program may fund research to determine how these activities affect Federal subsistence fisheries or fishery resources.

The Monitoring Program may fund assessments of key Federal subsistence fishery stocks in decline or that may decline due to climatological, environmental, habitat displacement, or other drivers; however, applicants must show how this knowledge would contribute to Federal subsistence fisheries management. Similarly, the Monitoring Program may legitimately fund projects that assess whether migratory barriers (e.g., falls, beaver dams) significantly affect spawning success or distribution; however, it would be inappropriate to fund projects to build fish passes, remove beaver dams, or otherwise alter or enhance habitat.

2024 NOTICE OF FUNDING OPPORTUNITY

The 2024 Notice of Funding Opportunity focused on priority information needs developed by the Subsistence Regional Advisory Councils with input from subject matter specialists. Investigation plans were due in February 2023. Submitted plans were reviewed and evaluated by the Office of Subsistence Management and U.S. Forest Service staff, and then scored by the Technical Review Committee. Each investigation plan was scored on the following five criteria: strategic priority, technical and scientific merit, investigator ability and resources, partnership and capacity building, and cost/benefit.

2024 FISHERIES RESOURCE MONITORING PLAN

A Fisheries Resource Monitoring Plan is developed during each Monitoring Program cycle that provides an overview of the process, the submitted materials, and the final list of funded projects. The 2024

Fisheries Resource Monitoring Plan will include regional overviews and comments from Regional Advisory Councils and the Interagency Staff Committee. Regional Overviews for each of the seven Monitoring Program regions contain area specific background information as well as the 2024 Technical Review Committee justifications and project executive summaries specific to those regions. The Regional Overviews are distributed for comment through Subsistence Regional Advisory Council meetings, beginning in September 2023. Regional Advisory Council comments are recorded and included in the draft 2024 Fisheries Resource Monitoring Plan that will be forwarded to the Interagency Staff Committee for their comments and finally to the Federal Subsistence Board.

The draft 2024 Fisheries Resource Monitoring plan will be presented to the Federal Subsistence Board at their January/February 2024 public meeting. The Board will review the draft plan and will forward their comments and recommendations to the Assistant Regional Director of the Office of Subsistence Management. Final project selection and funding approval lie with the Assistant Regional Director of the Office of Subsistence Management. For this funding cycle, a total of 26 investigation plans were received and 25 were considered eligible for funding. Investigators are expected to be notified in writing of the status of their proposals by late spring or early summer 2024.

FISHERIES RESOURCE MONITORING PROGRAM
SOUTHWEST ALASKA REGION OVERVIEW

Since the inception of the Monitoring Program in 2000, a total of 65 projects have been funded in the Southwest Alaska Region at a cost of $13.8 million (**Figure 1**). The State of Alaska has had the most projects funded in the region, followed by the U.S. Department of the Interior, other organizations, and Alaska rural organizations (**Figure 2**). See **Appendix 1** for more information on Southwest Alaska Region projects completed since 2000 and a list of all organizations that have received funding through the Monitoring Program.

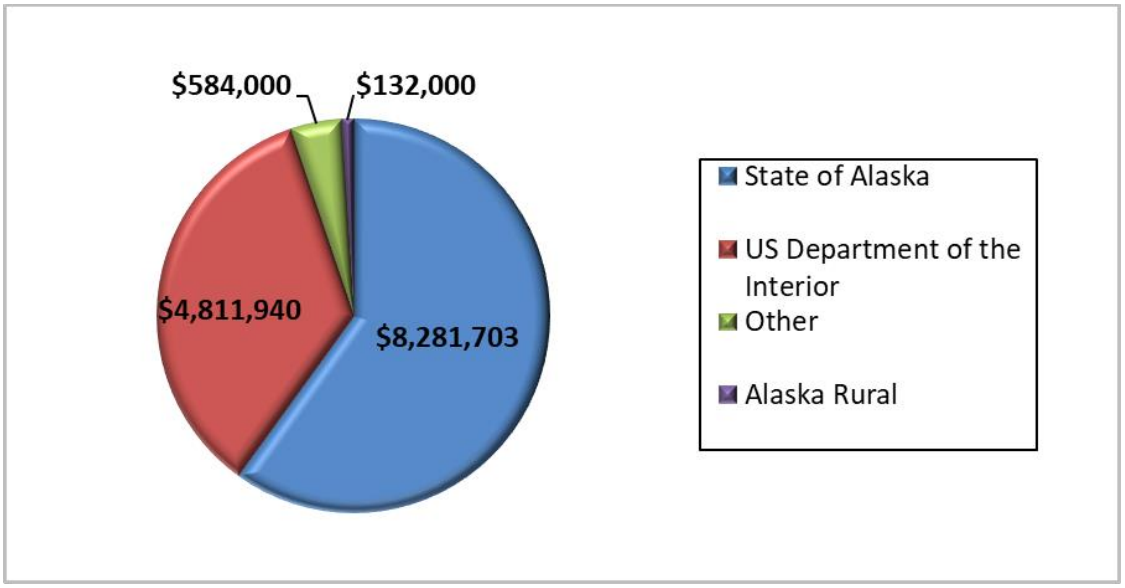

Figure 1. Monitoring Program fund distribution since 2000 in the Southwest Region.

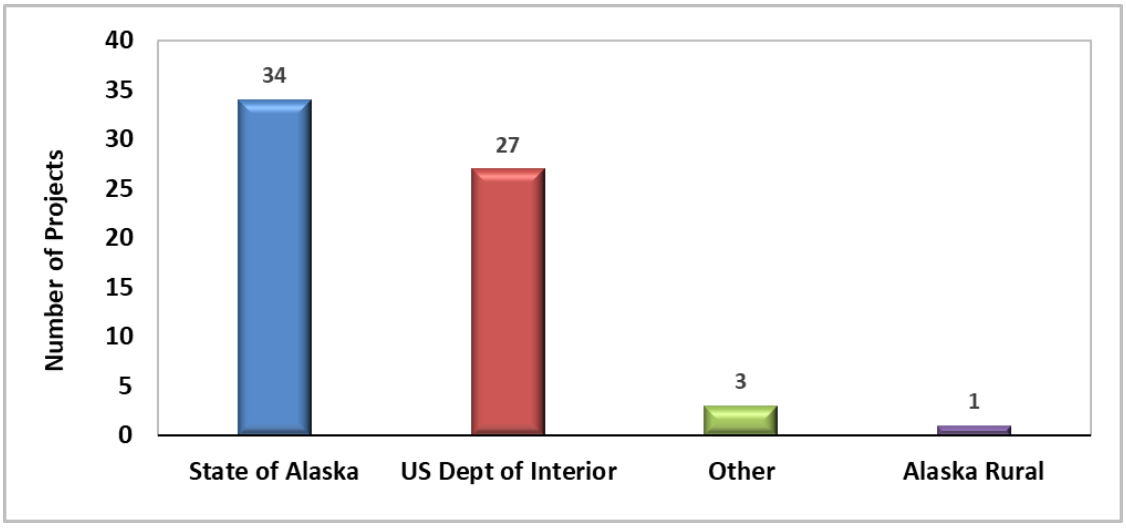

Figure 2. Number of Monitoring Program projects funded since 2000 in the Southwest Region.

PRIORITY INFORMATION NEEDS

The 2024 Notice of Funding Opportunity for the Southwest Alaska Region contained the following nine priority information needs developed by the Bristol Bay and Kodiak/Aleutians Regional Advisory Councils:

- Reliable estimates of Chinook Salmon escapement, evaluation of quality of escapement and harvest monitoring in Alagnak River, Big Creek, Meshik River, Naknek River, and Togiak River, including egg deposition, sex and size composition of spawners, and spawning habitat quality and utilization for determining the reproductive potential of spawning stocks. Harvest monitoring by user groups for the region is also encouraged.
- Comparative ecological evaluation of lake rearing habitats of Sockeye Salmon stocks in southwest Kodiak Island, including Olga Lakes and Akalura Lake watersheds, and the assessment of (1) declines of salmon stocks and associated subsistence harvest opportunities, and (2) effects of climate change on salmon production in these lake systems.
- Annual estimates of Sockeye Salmon escapement in the Lake Clark watershed.
- Evaluation of Chinook and Sockeye salmon populations in the Chignik River area to understand the decline in salmon stocks and associated subsistence harvest opportunities, such as reliable estimates of escapement, quality of escapement, and environmental impacts.
- Reliable estimates of abundance of salmon populations in the Kodiak Archipelago and Aleutian Islands areas important for subsistence use and assessment of changes in these populations. Specific areas of concern are McLees Lake, Mortensen's Lagoon, Unalaska Lake, and Kodiak Archipelago stocks.
- Using scale analyses of fresh and saltwater growth patterns over multiple years, examine how recent changes in the ocean affect growth and survival of Chinook and Sockeye salmon within their range and habitats of the Kodiak/Aleutian drainages of particular concern include the following drainages (Buskin, Karluk, Ayakulik, McClees drainages) and/or the Bristol Bay/Alaska Peninsula drainages (Chignik, Nushagak, Big Creek, Alagnak, Meshik, and Togiak drainages). The Chignik drainage is of particular concern.
- Evaluate effects on subsistence users in the Southwest Alaska region resulting from changes in fish populations, including biological considerations of run timing, run quality, sex ratios, and age composition, and incorporating local observations and knowledge. Research should include a multi-disciplinary approach and include elements of Traditional Ecological Knowledge as well as Stock Status and Trends.
- Enumeration of salmon smolt outmigration in the Buskin River system.
- Understanding subsistence sharing networks of fish throughout the Bristol Bay region and the importance of resource networks.

2024 MONITORING PLAN DEVELOPMENT FOR THE SOUTHWEST REGION

For the 2024 Monitoring Plan, one proposal was submitted for the Southwest Region (**Table 1**).

Table 1. Projects submitted for the Southwest Alaska Region, 2024 Monitoring Plan, including project duration and total funds requested.

Project Number	Title	Project Duration (Years)	Total Project Request
24-400	Estimation of Sockeye Salmon escapement into McLees Lake	4	$748,157
Total			**$748,157**

EXECUTIVE SUMMARY AND TECHNICAL REVIEW COMMITTEE JUSTIFICATION

The following executive summary was written by the principal investigator and submitted to the Office of Subsistence Management as part of a proposal package. It may not reflect the opinions of the Office of Subsistence Management or the Technical Review Committee. The executive summary may have been altered for length.

Technical Review Committee justifications are a general description of the committee's assessment of proposals when examining them for strategic priority, technical and scientific merit, investigator ability and resources, partnership and capacity building, and cost/benefit. More in-depth reviews are provided to investigators following project selection.

Investigator Submitted Executive Summary:

Project Number:	24-400
Title:	Estimation of Sockeye Salmon escapement into McLees Lake
Geographic Region:	Southwest Alaska
Data Types:	Stock Status and Trends
Principal Investigator:	Rachel Lekanoff, Qawalangin Tribe of Unalaska
Co-investigator:	Mandy Salminen, Qawalangin Tribe of Unalaska
	Tyler Lawson, Alaska Department of Fish and Game
	Matt Keyse, Alaska Department of Fish and Game
Project Request:	**2024:** $178,986 **2025:** $165,900 **2026:** $204,726 **2027:** $198,545
Total Request:	$748,157

Issue: This project addresses two priority information needs identified by the Federal Subsistence Regional Advisory Council 1) provide reliable abundance estimates of McLees Lake sockeye salmon *Oncorhynchus nerka* and 2) use scale analyses of fresh and saltwater growth patterns over multiple years to examine how recent changes in the ocean affect growth and survival of sockeye salmon in the McLees

drainage. McLees Lake, on Unalaska Island, lies within the Alaska Maritime National Wildlife Refuge. As such, its run of sockeye salmon is identified as a managed stock in federal subsistence regulations. By utilizing both abundance and scale/habitat data, a more complete understanding of McLees Lake sockeye salmon production will be gained to maintain the health of this stock and help to ensure future subsistence fishing opportunities. This proposal is a continuation of Fisheries Resource Monitoring Program (FRMP) projects 04-228, 06-205, 10-205, 14-207, and 20-201, which have provided in-season stock composition estimates of chum salmon to fishery managers within 24 to 48 hours of receiving samples from the Pilot Station sonar test fishery. The disparate strength of individual stocks within and among years makes it clear that in-season stock return data assists management to meet escapement. It provides a real-time tool that allows for informed decisions on regulating fisheries to meet escapement and harvest allocations.

Objective:

1. Enumerate the daily passage of sockeye salmon through the weir;
2. Describe the run-timing, or proportional daily passage, of sockeye salmon through the weir;
3. Estimate the weekly sex and age composition of sockeye salmon such that simultaneous 90% confidence intervals have a maximum width of 0.20;
4. Estimate the mean length of sockeye salmon by sex and age;
5. Estimate the production thresholds for rearing juvenile sockeye salmon; and
6. Use scale analyses of fresh and saltwater growth patterns to examine growth and survival of sockeye salmon

Methods: McLees Lake is located northwest of Unalaska village within the Alaska Maritime Wildlife Refuge and empties into the Bering Sea at Reese Bay. A rigid picket weir is operated during each summer of the project. The weir and sampling trap is inspected daily and maintained to ensure integrity. Fish are passed and enumerated. Daily escapement counts are relayed to ADF&G, allowing project data to be used in making in-season management decisions for the Reese Bay subsistence fishery.

Data on sockeye salmon age, sex, and length (ASL) are collected using a temporally stratified sampling design. Fish ages are assigned by ADF&G fish biologists. Image measurement software will be used to evaluate the relative growth of fish by measuring freshwater and saltwater annuli. The growth measurement data will be explored to evaluate the relative health of the freshwater residence time, growth relationships to climate indices and the utility of using saltwater growth measurements to predict future runs.

Limnological sampling will continue to be done to assess habitat quality, zooplankton productivity, and estimate the capacity of McLees Lake to rear juvenile sockeye salmon and support adult escapement.

Partnerships/Collaboration: This project will continue the development of partnerships between the U.S. Fish and Wildlife Service, the Qawalangin Tribe of Unalaska, and ADF&G. McLees Lake sockeye

salmon are heavily harvested by Unalaska subsistence users and are vital to the Qawalangin Tribe's culture and food security. The Qawalangin Tribe has a Partners Program Biologist hired for 2024-2025 to continue to strengthen a Fisheries Science, Research, and Development Program, funded by the Partners for Fisheries Monitoring Program, F24AS00002. The Partners biologist position will continue to strengthen the Tribe's ability to participate in the assessment of the McLees Lake (Reese Bay) subsistence fishery and will reinforce trust and partnerships within the community of Unalaska and the other numerous stakeholders through consultation and the exchange of information. Through a Partners biologist, the Qawalangin Tribe will be able to assess and understand local fisheries management by performing weir operations, facilitating logistical needs, and assisting with data management. By developing technical fisheries expertise, the Partners biologist will increase the tribe's involvement in the meaningful support of this important salmon resource. This collaboration will empower the Qawalangin Tribe's ability to continue weir operations in future years.

Additional capacity building will occur with the Qawalangin Tribe by their direct participation in the hiring of the field technicians and ongoing consultation to develop educational opportunity. For this proposal period, ADF&G will hire two field technicians, and the Qawalangin Tribe will hire one technician through the Partners for Fisheries Monitoring Program. The Partner technician will be a local hire, or an Alaska Native Science and Engineering Program (ANSEP) student. ADF&G will hire the two field technicians with recommendation and consultation from the Qawalangin Tribe to provide emphasis on a local applicant pool. The ADF&G project and crew leader will act as mentors with the purpose of training the technicians to advance their careers and knowledge in fisheries management. The Qawalangin. Tribe and ADF&G will present results of the project at Kodiak/Aleutians Regional Advisory Council meetings.

Technical Review Committee Justification: This project directly addresses two priority information needs identified by the Kodiak/Aleutians Subsistence Regional Advisory Council. Each objective is clear, measurable, and achievable and the project uses proven methods that have been in place during many years of operation. The project addresses immediate subsistence and conservation concerns by informing State fishery managers about run timing and run strength for in-season management decisions. The comprehensive data collection may lead to a better understanding of environmental effects on Sockeye Salmon populations. The Qawalangin Tribe has increasingly taken on other administrative responsibilities since the project restarted in 2020 and took over the main duties of logistical support for the current Monitoring Program project during the 2022 field season. Starting in 2024, the Qawalangin Tribe will be responsible for most aspects of in-season logistical support, budget management, and reporting, and they have articulated a clear plan for project success. The ADF&G has volunteered to train personnel and provide advice and support to the Qawalangin Tribe investigators. Local hires and ANSEP students will be targeted to staff the project. The fund request is somewhat reasonable for the planned effort and deliverables, considering there is substantial ADF&G volunteer uncommitted resources and Partners Program funds used for this project. Letters of support were provided from the City of Unalaska, the Ounalashka Corporation, and the United Native Fishermen's Association.

APPENDIX 1
PROJECTS FUNDED IN THE SOUTHWEST ALASKA REGION SINCE 2000

Project Number	Project Title	Investigators
	Bristol Bay Salmon Projects	
00-010	Togiak River Salmon Weir	USFWS
00-031	Alagnak River Sockeye Salmon Escapement	AFD&G, NPS, BBNA
00-033	Alagnak River Angler Effort Index	ADF&G, NPS, BBNA
00-042	Lake Clark Sockeye Salmon Assessment	USGS
01-047	Togiak River Subsistence Harvest Monitoring	BBNA, ADF&G, USFWS
01-075	Nondalton Sockeye Salmon and Freshwater Fish TEK	NPS, NTC, USGS
01-095	Lake Clark Sockeye Salmon Escapement	USGS, NTC
01-109	Traditional Ecological Knowledge of Alaska Peninsula/Becharof NWR	ADF&G, BBNA
01-173	Alagnak River Harvest Salmon Escapement Estimation	ADF&G
01-204	Ugashik Lakes Coho Salmon Escapement Estimation	USFWS
03-046	Fisheries Biotechnician Training Program	NPS
04-411	Lake Clark Sockeye Salmon Run Timing	USFWS, BBNA
04-454	Bristol Bay Sharing, Bartering, and Traded of Subsistence Resources	ADF&G, BBNA
05-402	Lake Clark Sockeye Salmon Escapement	NPS, USGS
08-402	Togiak River Chinook Salmon Radio Telemetry	USFWS, BBNA, ADF&G
08-405	Lake Clark Sockeye Salmon Assessment	NPS, USS&E, BBNA
10-402	Togiak River Chinook Salmon Adult Assessment	USFWS, BBNA, ADF&G
16-451	Bristol Bay Subsistence Salmon Networks	ADF&G, BBNA, OSU
16-453	Togiak River Chinook Salmon Subsistence Harvest Assessment	ADF&G, BBNA
22-452[a]	False Pass and Nelson Lagoon Subsistence Harvest Monitoring and Traditional Ecological Knowledge (TEK) Investigation	ADF&G
22-453[a]	Subsistence Harvests and Uses of Salmon and Other Wild Resources in Manokotak, Alaska	ADF&G, BBNA
	Chignik Salmon Projects	
02-098	Kametalook River Coho Salmon Escapement & Carrying Capacity	USFWS, BBNA
02-099	Clark River Estimation of Sockeye and Coho Salmon Escapement	USFWS, BBNA
03-043	Perryville Coho Salmon Escapement	USFWS
05-405	Perryville-Chignik Coho and Sockeye Salmon Aerial Surveys	USFWS
07-404	Perryville-Clark River Coho and Sockeye Salmon Aerial Surveys	USFWS
22-401[a]	Chignik River Subsistence Harvest Surveys and Escapement Indexing	ADF&G, USFWS, CIC

Project Number	Project Title	Investigators
	Bristol Bay-Chignik Freshwater Species Projects	
00-011	Togiak River Dolly Varden Genetic Baseline Development	USFWS
00-012	Bristol Bay Traditional Knowledge of Fish	ADF&G
02-034	Kvichak River Resident Species Subsistence Fisheries	ADF&G, BBNA
04-401	Ungalikthlik and Negukthlik Rivers Rainbow Trout Assessment	USFWS
04-415	Tazimina Rainbow Trout Assessment	ADF&G
05-403	Lake Clark Whitefish Assessment	ADF&G
07-408	Togiak River Rainbow Smelt Assessment	USFWS, BBNA
07-452	Kvichak Watershed Subsistence Fishing Ethnography	ADF&G, BBNA, NPS
12-452	Whitefish Trends in Lake Clark and Iliamna Lake	ADF&G, BBNA, NPS, NTC
	Kodiak-Aleutians Projects	
00-032	Buskin River Sockeye Salmon Stock Assessment	ADF&G
01-059	McLees Lake Sockeye Salmon Escapement	USFWS
01-206	Mortenson Creek Sockeye and Coho Salmon Escapement	USFWS
02-032	Lower Alaska Peninsula/Aleutians Subsistence Fish Harvest Assessment	ADF&G, APIA, ISU
03-047	Afognak Lake Sockeye Smolt Enumerations Feasibility	ADF&G
04-402	Mortenson Creek Sockeye and Coho Escapement	USFWS
04-403	McLees Lake Sockeye Salmon Escapement	USFWS
04-412	Afognak Lake Sockeye Salmon Stock Assessment	ADF&G
04-414	Buskin River Sockeye Salmon Stock Assessment	ADF&G
04-457	Kodiak Subsistence Fisheries Harvest and TEK	ADF&G, KANA
07-401	Afognak Lake Sockeye Salmon Smolt Assessment	ADF&G
07-402	Buskin River Sockeye Salmon Weir	ADF&G
07-405	McLees Lake Sockeye Salmon Weir	USFWS, ADF&G, QT
10-401	Afognak Lake Sockeye Salmon Smolt and Adult Assessment	ADF&G
10-403	Buskin River Sockeye Salmon Adult Assessment	ADF&G
10-404	Buskin River Sockeye Salmon Smolt Assessment Feasibility	ADF&G
10-406	McLees Lake Sockeye Salmon Weir	USFWS, ADF&G, QT
12-450	Aleutian Islands Salmon and Other Subsistence Harvests	ISU
12-453	Kodiak Salmon Fishery Changing Patterns	ADF&G
14-401	Buskin River Sockeye Salmon Stock Assessment	ADF&G
14-402	Afognak Lake Sockeye Salmon Stock Assessment	ADF&G
16-452	Western Gulf of Alaska Salmon and Other Harvests	ISU
18-400	Buskin River Sockeye Salmon Stock Assessment and Monitoring	ADF&G
18-450	Unalaska Fish Harvest Practices	ADF&G
18-451	Subsistence Harvest Trends of Salmon and Nonsalmon Fish in 4 Southern Kodiak Island Communities	ADF&G
20-400[a]	McLees Lake Sockeye Salmon Escapement	ADF&G/QT

Project Number	Project Title	Investigators
20-450[a]	Kodiak Road System Subsistence Salmon and Nonsalmon	ADF&G
22-400[a]	Buskin River Salmon Stock Assessment and Monitoring, Kodiak, Alaska	ADF&G
22-454[a]	Reliable estimates of subsistence harvests and uses in Ouzinkie and Port Lions	ADF&G, USFWS

a= Ongoing project.

Abbreviations used for investigators are: **ADF&G** = Alaska Department of Fish and Game, **APIA** = Aleutian-Pribilof Islands Association, **BBNA** = Bristol Bay Native Association, **CIC** = Chignik Intertribal Coalition, **ISU** = Idaho State University, **KANA** = Kodiak Area Native Association, **NPS** = National Park Service, **NTC** = Nondalton Tribal Council, **OSU** = Oregon State University, **QT** = Qawalangin Tribe, **USFWS** = U.S. Fish and Wildlife Service, **USGS** = U.S. Geological Survey, **USS&E** = U.S. Science and Education, and **UW** = University of Washington.

FISHERIES RESOURCE MONITORING PROGRAM
MULTI-REGION OVERVIEW

Since the inception of the Monitoring Program in 2000, a total of 18 multi-Region projects have been funded at a cost of $2.1 million (**Figure 1**). The State of Alaska has had the most multi-Region projects funded, followed by Department of the Interior agencies, other organizations, and the Department of Agriculture (**Figure 2**). See **Appendix 1** for more information on multi-Region projects completed since 2000 and a list of all organizations that have received funding through the Monitoring Program.

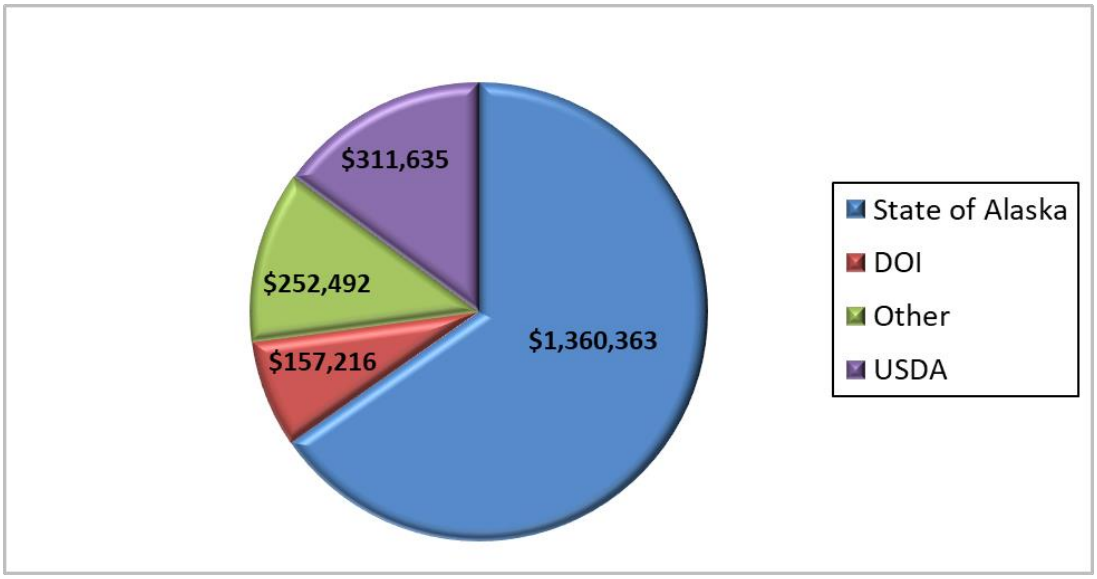

Figure 1. Monitoring Program fund distribution since 2000 for multi-Region projects.

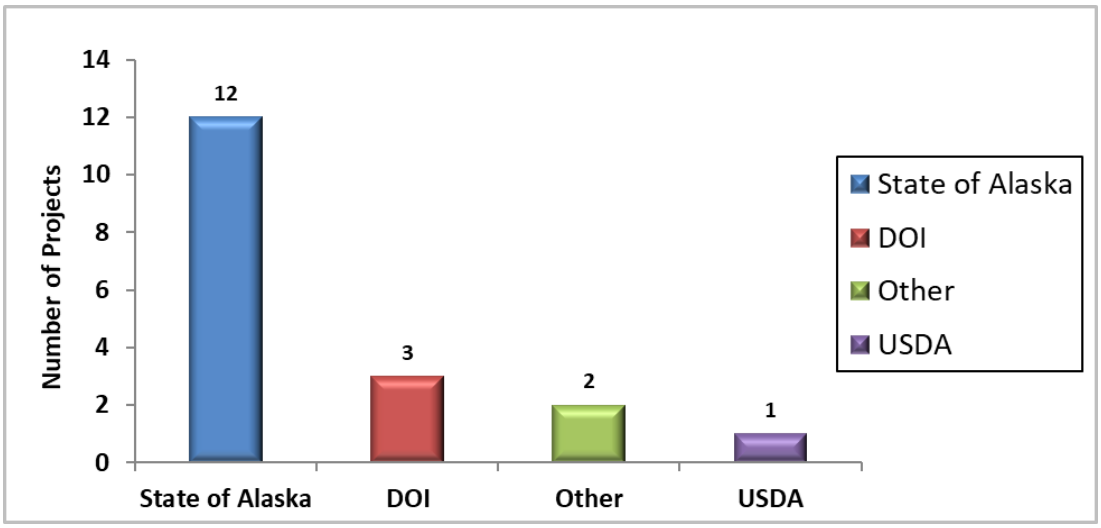

Figure 2. Number of Monitoring Program projects funded since 2000 for multi-Region projects.

PRIORITY INFORMATION NEEDS

The 2024 Notice of Funding Opportunity for multi-Region projects contained the following four priority information needs identified by Regional Advisory Councils:

- Gain a better understanding of ecosystem factors negatively impacting subsistence salmon runs and harvest practices in Alaska, including ocean conditions, freshwater conditions, and changing climate conditions.
- Changes in relative abundance and species composition of salmon species, and expansion of salmon species into new waters.
- The impact of changing weather on traditional fish processing practices and food security.
- Effects of fluctuating water levels on salmon spawning viability.

2024 MONITORING PLAN DEVELOPMENT FOR THE MULTI-REGION

For the 2024 Monitoring Plan, one multi-Region proposal was submitted (**Table 1**).

Table 1. Multi-Region projects submitted for the 2024 Monitoring Plan, including project duration and total funds requested.

Project Number	Title	Project Duration (Years)	Total Project Request
24-750	Understanding Ecosystem Change on Traditional Salmon Subsistence Practices and Community Food Security in Three Coastal Alaskan Communities	3	$517,285
Total			**$517,285**

EXECUTIVE SUMMARY AND TECHNICAL REVIEW COMMITTEE JUSTIFICATION

The following executive summary was written by the principal investigator and was submitted to the Office of Subsistence Management as part of a proposal package. It may not reflect the opinions of the Office of Subsistence Management or the Technical Review Committee. The executive summary may have been altered for length.

Technical Review Committee justifications are a general description of the committee's assessment of proposals when examining them for strategic priority, technical and scientific merit, investigator ability and resources, partnership and capacity building, and cost/benefit. More in-depth reviews are provided to investigators following project selection.

Investigator Submitted Executive Summary:

Project Number:	24-750
Title:	Evaluating Ecosystem Change on Traditional Salmon Subsistence Practices and Community Food Security in Three Coastal Alaskan Communities.
Geographic Region:	Multi-Regional
Data Types:	Harvest Monitoring (HM) and Traditional Ecological Knowledge (TEK)
Principal Investigator:	Chance Wilcox, Alaska Department of Fish and Game
Co-investigator:	Jacqueline Keating, Alaska Department of Fish and Game
	Lauren Sill, Alaska Department of Fish and Game
Project Request:	**2024:** $158,771 **2025:** $174,343 **2026:** $184,171
Total Request:	$517,285

Issue: This project responds to two priority information needs identified for the multi-regional category in the 2024 Fisheries Resource Monitoring Program call for proposals prepared by the Office of Subsistence Management: "Gain a better understanding of ecosystem factors negatively impacting subsistence salmon runs and harvest practices in Alaska, including ocean conditions, freshwater conditions, and changing climate conditions" and "the impact of changing weather on traditional fish processing practices and food security." This research project will collect subsistence salmon harvest data, community food security information, and harvest assessments over time by residents of Akutan, Nanwalek, and Hoonah and document their traditional and contemporary subsistence harvest and use areas and traditional ecological knowledge (TEK) regarding local ecosystem changes and their effect on salmon populations and subsistence salmon harvest and processing practices. The data from this study will be useful for regulatory bodies such as the Alaska Board of Fisheries and the Federal Subsistence Board in their assessments of whether subsistence needs are being met and inform federal and state managers on subsistence regulations from the perspective of local resource users, especially considering ecosystem changes such as coastal erosion that affect fishing practices.

Pacific salmon are a fundamental subsistence resource for the communities of Akutan, Hoonah, and Nanwalek. In addition to the social, economic and cultural importance of this resource, the ability to harvest and process subsistence salmon in coastal Alaska is essential to community food security for the residents of the three communities. Both salmon spawning and rearing habitats, as well as subsistence harvest and uses of salmon by these three communities occur within some federal conservation system boundaries, where there are overlapping subsistence fishing opportunities provided by the Federal Subsistence Board (FSB). Harvest and uses of subsistence salmon by residents of Akutan occurs within the boundaries of the Alaska Maritime National Wildlife Refuge. The community of Hoonah is located within the bounds of the Tongass National Forest, and residents harvest subsistence salmon through the area. Areas of the Kenai National Wildlife Refuge are utilized by residents of Nanwalek for subsistence pursuits of salmon.

The most recent ADF&G Division of Subsistence surveys from Akutan (2008), Hoonah (2013), and Nanwalek (2014) documented that salmon made up the largest portion of these communities' subsistence harvests. However, these studies did not investigate how changing ecosystem features, such as more

frequent and less predictable storms, changing wind patterns, and warmer ocean temperatures affected salmon populations, traditional salmon processing methods, and community food security.

This project will utilize face-to-face household surveys, mapping, key respondent interviews, and participant observation to investigate how ecosystem and weather changes have altered subsistence practices and community food security over time. This proposed project will: 1) update subsistence salmon harvest and use estimates in Akutan, Hoonah, and Nanwalek for the calendar year 2025; 2) document observations related to the effects of environmental change on salmon populations and subsistence pursuits by study community residents; and 3) integrate the results across the study communities to identify comparisons as well as regional trends or associations with particular environmental features. The documentation of TEK will aid in contextualizing harvest estimates and collate the observations of changes linked to climate on local salmon populations and subsistence activities. For example, studies throughout coastal Alaska have documented rapidly increasing coastal shoreline erosion and increasing ocean temperatures; these and other climate related phenomena may alter subsistence activities and cause area residents to adapt their subsistence harvest and processing practices. The results of this study will increase federal and state fisheries managers' understanding of community-based subsistence fisheries, especially considering the rapidly changing environmental conditions of coastal Alaska.

Objectives: The goal of the project is to document observations of ecosystem factors affecting salmon runs and subsistence practices in coastal Alaska communities. The project will result in a better understanding of the effects of unpredictable and changing weather patterns experienced by coastal Alaska communities as they relate to subsistence salmon harvesting and processing and community food security.

To accomplish this, the project has three objectives:

1. Document, characterize, and quantify salmon harvest and processing and changes thereto in Akutan, Nanwalek, and Hoonah to better understand impacts of ecosystem change on community subsistence practices and food security.
2. Estimate subsistence salmon harvest amounts and locations for three coastal Alaska communities for study year 2025.
3. Record the geographic extent of harvest and use areas for salmon by residents of Akutan, Nanwalek, and Hoonah during the study year and compare with areas used for salmon harvest activities over time.

Methods: This study will take place in three communities, Akutan, Nanwalek, and Hoonah, and will integrate three social science data gathering methods to estimate the harvest and use of salmon for subsistence by community residents, measure food security in each community, and document TEK related to observed effects of environmental change on salmon harvest and processing. These methods are: 1) participant observation, 2) key respondent interviews, and 3) comprehensive household harvest surveys. The data gathering methods for this project were designed to be integrated so that data collected using one method inform the development and implementation of other methods. Data from all three methods will provide quantitative and qualitative material to accomplish Objective 1. Objective 2 will be achieved using data from the household harvest surveys and accompanying geographic data. Geographical

data collected with the household harvest surveys will accomplish Objective 3, although data from interviews and participant observation will also address this objective.

Partnerships/Capacity Building: In accordance with principles for ethical research and to establish and maintain working relationships, the Hoonah Indian Association, Chugach Regional Resources Commission, and the Native Village of Akutan were consulted during the development of this proposal. Ongoing consultation with the tribal councils will occur throughout the project. Prior to the publication of the technical report, researchers will return to their research communities to disseminate study results, answer questions, and collect feedback people may have about the project and resulting data. During the project, researchers will work with local tribal councils to obtain assistance with survey development, interview protocols, and logistics. Local research assistants in each community will help coordinate local logistical support and participation in project activities. Through the surveys and interviews, community members will have the opportunity to share their knowledge of salmon used for subsistence and their experiences with these resources.

Technical Review Committee Justification: The proposed project is a compelling, multi-region study that will document and compare local observations of ecosystem factors that are impacting salmon runs and subsistence practices in coastal Alaskan communities. The project will combine participant-observation, harvest and use surveys, key respondent interviews, and mapping to better understand the impacts of unpredictable and changing weather patterns experienced by coastal Alaskan communities as they relate to subsistence salmon harvesting and processing and community food security. The project will also provide updated salmon harvest and use data for the communities of Akutan, Nanwalek, and Hoonah. The project will also document traditional and contemporary subsistence harvest and use areas and traditional ecological knowledge (TEK) regarding local ecosystem changes impacting subsistence in southern coastal Alaska. Several regional priority information needs and key issues of concern are addressed that have been specifically discussed in many Regional Advisory Councils' reports to the Federal Subsistence Board for at least the past decade.

The scientific framework of the project is sound, and it displays a greater commitment to the benefits of mixed-methods research. Specifically, the project should provide for a better integration of qualitative data such as traditional ecological knowledge with quantitative harvest and use data. Still, the project would benefit from a more thorough explanation of how and why particular survey and interview numbers were chosen for each study community, and how these amounts of surveys and interviews will ensure the representativeness of the study's findings. The project has the potential to be of interest and use to public, policymakers, and scientific interests both inside and outside the realms of Alaskan subsistence. However, the project would be a stronger candidate for funding if the research communities were more directly reliant upon federal subsistence fisheries, and if the research protocol could be expanded to focus on all key subsistence fish and shellfish harvested in each proposed study community. This is particularly important considering the overall amount of funding requested for this project. The project could also make a stronger effort to forge meaningful working research partnerships with tribal organizations, rural organizations, and/or the Federal land and resource management agencies working in and around the study communities. Despite the potential of the project, it is also worth questioning the cost effectiveness of some aspects of the proposed budget.

APPENDIX 1
PROJECTS FUNDED IN THE YUKON REGION SINCE 2000

Project Number	Project Title	Investigators
00-016	Information Access of AYK Fish Data	ADF&G
00-017	Statewide Subsistence Harvest Strategy	ADF&G, AIT
01-010	Regulatory History of Alaska Salmon Regulations	ADF&G, EA
01-106	Validity and Reliability of Fisheries Harvest	ADF&G, AITC, NPS
01-107	Implementation of Statewide Fisheries Harvest Strategy	ADF&G, AITC
01-154	Project Information and Access System	ADF&G
02-043	Alaska Subsistence Fisheries Database GIS Integration	ADF&G
02-069	Shared Fishery Database	ADF&G
04-701	Develop Shared Fishery Database	ADF&G
04-751	Subsistence Harvest Database Update and Report	ADF&G
05-702	Whitefish Genetic Species Markers	USFWS
06-701	Dolly Varden Stock Composition	USFWS
08-701	Stream Temperature Monitoring	ARRI
12-700	Genetic Baseline for Inconnu from the Yukon and Kuskokwim Rivers	USFWS
14-701	Stream Temperature Monitoring	ARRI
16-752	Subsistence Harvest and Use Patterns of Nonsalmon by Yukon-Kuskokwim Delta Coastal Communities	ADF&G
18-751	Subsistence Harvest Assessment and Stock Composition of Dolly Varden and Nonsalmon fish stocks in the Togiak National Wildlife Refuge	ADF&G

Abbreviations used: ADF&G=Alaska Department of Fish and Game, AITC=Alaska Inter-Tribal Council, ARRI=Aquatic Restoration and Research Institute, EA=Elizabeth Andrews, NPS=National Park Service, USFWS=U.S. Fish and Wildlife Service.

ANNUAL REPORTS

Background

ANILCA established the Annual Reports as the way to bring regional subsistence uses and needs to the Secretaries' attention. The Secretaries delegated this responsibility to the Board. Section 805(c) deference includes matters brought forward in the Annual Report.

The Annual Report provides the Councils an opportunity to address the directors of each of the four Department of Interior agencies and the Department of Agriculture Forest Service in their capacity as members of the Federal Subsistence Board. The Board is required to discuss and reply to each issue in every Annual Report and to take action when within the Board's authority. In many cases, if the issue is outside of the Board's authority, the Board will provide information to the Council on how to contact personnel at the correct agency. As agency directors, the Board members have authority to implement most of the actions which would effect the changes recommended by the Councils, even those not covered in Section 805(c). The Councils are strongly encouraged to take advantage of this opportunity.

Report Content

Both Title VIII Section 805 and 50 CFR §100.11 (Subpart B of the regulations) describe what may be contained in an Annual Report from the councils to the Board. This description includes issues that are not generally addressed by the normal regulatory process:

- an identification of current and anticipated subsistence uses of fish and wildlife populations within the region;
- an evaluation of current and anticipated subsistence needs for fish and wildlife populations from the public lands within the region;
- a recommended strategy for the management of fish and wildlife populations within the region to accommodate such subsistence uses and needs related to the public lands; and
- recommendations concerning policies, standards, guidelines, and regulations to implement the strategy.

Please avoid filler or fluff language that does not specifically raise an issue of concern or information to the Board.

Report Clarity

In order for the Board to adequately respond to each Council's annual report, it is important for the annual report itself to state issues clearly.

- If addressing an existing Board policy, Councils should please state whether there is something unclear about the policy, if there is uncertainty about the reason for the policy, or if the Council needs information on how the policy is applied.
- Council members should discuss in detail at Council meetings the issues for the annual report and assist the Council Coordinator in understanding and stating the issues clearly.

- Council Coordinators and OSM staff should assist the Council members during the meeting in ensuring that the issue is stated clearly.

Thus, if the Councils can be clear about their issues of concern and ensure that the Council Coordinator is relaying them sufficiently, then the Board and OSM staff will endeavor to provide as concise and responsive of a reply as is possible.

Report Format

While no particular format is necessary for the Annual Reports, the report must clearly state the following for each item the Council wants the Board to address:

1. Numbering of the issues,
2. A description of each issue,
3. Whether the Council seeks Board action on the matter and, if so, what action the Council recommends, and
4. As much evidence or explanation as necessary to support the Council's request or statements relating to the item of interest.

FRMP Project Updates

1. **FRMP 2020-450: Subsistence harvest trends of salmon and nonsalmon fish in Kodiak City and road-connected areas** (Ends June 30, 2024)
   Purpose: (1) Provide reliable harvest estimates of the use of salmon and other nonsalmon fish species for subsistence, and (2) document local observations of change in fish populations and associated effects on subsistence uses for the Kodiak Road System.
   Next step: Division and Sun'aq Tribe of Kodiak (STK) staff conducted additional in-depth mapping interviews with 7 key respondents in July 2023. Subsistence staff accompanied STK biologist Daniel Smith and intern Molly Kummen on a diving trip for crayfish in Buskin Lake, and recorded an interview on the Tribe's research efforts on crayfish and subsistence salmon. The Division will present the final draft report to STK and the Kodiak National Wildlife Refuge for review in spring of 2024, and the final report will be complete by June 2024.

Daniel Smith with crayfish

2. **FRMP 2022-454: Reliable estimates of subsistence harvests and uses in Ouzinkie and Port Lions**
   (Ends December 31, 2024)
   Purpose: (1) Produce reliable estimates of salmon and other resources harvested and used for subsistence; (2) Create comprehensive spatial maps of subsistence harvest areas; and (3) Document local observations of subsistence harvesting practices and potential changes in subsistence resource populations, harvesting trends, and areas used.
   Next step: ADF&G is currently analyzing data from household surveys conducted in February 2023. Division staff will travel to Port Lions and Ouzinkie in the fall of 2023 with Koniag Community Affairs Liaison Amy Peterson to host community meetings and conduct participant observation during deer hunting season. A final community data review meeting will take place in fall of 2024, and the report will be completed in December 2024.

Harvest surveys in Port Lions

3. **FRMP 2022-452: False Pass and Nelson Lagoon Subsistence Harvest Monitoring and Traditional Ecological Knowledge (TEK) Investigation** (Ends June 30, 2025)
   Purpose: (1) Estimate subsistence salmon and other wild resources harvest amounts for study year 2023; (2) evaluate the subsistence salmon permit system and recommend improvements based on study findings; (3) document traditional ecological knowledge (TEK) observations related to the effects of environmental change on salmon populations and subsistence activities.
   Next step: Researchers will travel to both communities for a scoping meeting prior to the 2024 household harvest surveys for the 2023 study year. Household harvest surveys will occur in early 2024 in both communities.

For more information or concerns about subsistence

Kodiak: Jackie Keating, Southcentral Subsistence Resource Specialist 3, jacqueline.keating@alaska.gov
Aleutians: Chance Wilcox, Southwest Subsistence Resource Specialist 2, chance.wilcox@alaska.gov
Visit the Community Subsistence Information System: http://www.adfg.alaska.gov/sb/CSIS/
Download Subsistence Publications: http://www.adfg.alaska.gov/sf/publications/

Winter 2024 Regional Advisory Council Meeting Calendar

Last updated 5/2/2023

Due to travel budget limitations placed by Department of the Interior on the U.S. Fish and Wildlife Service and the Office of Subsistence Management, the dates and locations of these meetings will be subject to change.

Sunday	Monday	Tuesday	Wednesday	Tu rsday	Friday	Saturday
					Mar. 1	*Mar. 2*
Mar. 3	*Mar. 4 Window Opens*	*Mar. 5*	*Mar. 6*	*Mar. 7*	*Mar. 8*	*Mar. 9*
		All Regions Meeting (Anchorage)				
Mar. 10	*Mar. 11*	*Mar. 12*	*Mar. 13*	*Mar. 14*	*Mar. 15*	*Mar. 16*
Mar. 17	*Mar. 18*	*Mar. 19*	*Mar. 20*	*Mar. 21*	*Mar. 22*	*Mar. 23*
Mar. 24	*Mar. 25*	*Mar. 26*	*Mar. 27*	*Mar. 28*	*Mar. 29 Window Closes*	*Mar. 30*

Fall 2024 Regional Advisory Council Meeting Calendar

Last updated 3/3/2023

Due to travel budget limitations placed by Department of the Interior on the U.S. Fish and Wildlife Service and the Office of Subsistence Management, the dates and locations of these meetings will be subject to change.

Sunday	Monday	Tuesday	Wednesday	Tu rsday	Friday	Saturday
Aug. 18	*Aug. 19* ***Window Opens***	*Aug. 20*	*Aug. 21*	*Aug. 22*	*Aug. 23*	*Aug. 24*
	NSRAC (Utqiagvik)					
Aug. 25	*Aug. 26*	*Aug. 27*	*Aug. 28*	*Aug. 29*	*Aug. 30*	*Aug. 31*
Sep. 1	*Sep. 2* ***Labor Day Holiday***	*Sep. 3*	*Sep. 4*	*Sep. 5*	*Sep. 6*	*Sep. 7*
			KARAC (Unalaska)			
Sep. 8	*Sep. 9*	*Sep. 10*	*Sep. 11*	*Sep. 12*	*Sep. 13*	*Sep. 14*
Sep. 15	*Sep. 16*	*Sep. 17*	*Sep. 18*	*Sep. 19*	*Sep. 20*	*Sep. 21*
Sep. 22	*Sep. 23*	*Sep. 24*	*Sep. 25*	*Sep. 26*	*Sep. 27*	*Sep. 28*
Sep. 29	*Sep. 30*	*Oct. 1*	*Oct. 2*	*Oct. 3*	*Oct. 4*	*Oct. 5*
			WIRAC (Aniak)			
Oct. 6	*Oct. 7*	*Oct. 8*	*Oct. 9*	*Oct. 10*	*Oct. 11*	*Oct. 12*
		EIRAC (Tanana)		**SCRAC** (Anchorage)		
Oct. 13	*Oct. 14* ***Columbus Day Holiday***	*Oct. 15*	*Oct. 16*	*Oct. 17*	*Oct. 18*	*Oct. 19*
		YKDRAC (Bethel)				
Oct. 20	*Oct. 21*	*Oct. 22*	*Oct. 23*	*Oct. 24*	*Oct. 25*	*Oct. 26*
				SPRAC (Nome)		
		SEARAC (Ketchikan)				
Oct. 27	*Oct. 28*	*Oct. 29*	*Oct. 30*	*Oct. 31*	*Nov. 1* ***Window Closes***	*Nov. 2*
		BBRAC (Dillingham)				
	NWARAC (Kotzebue)					

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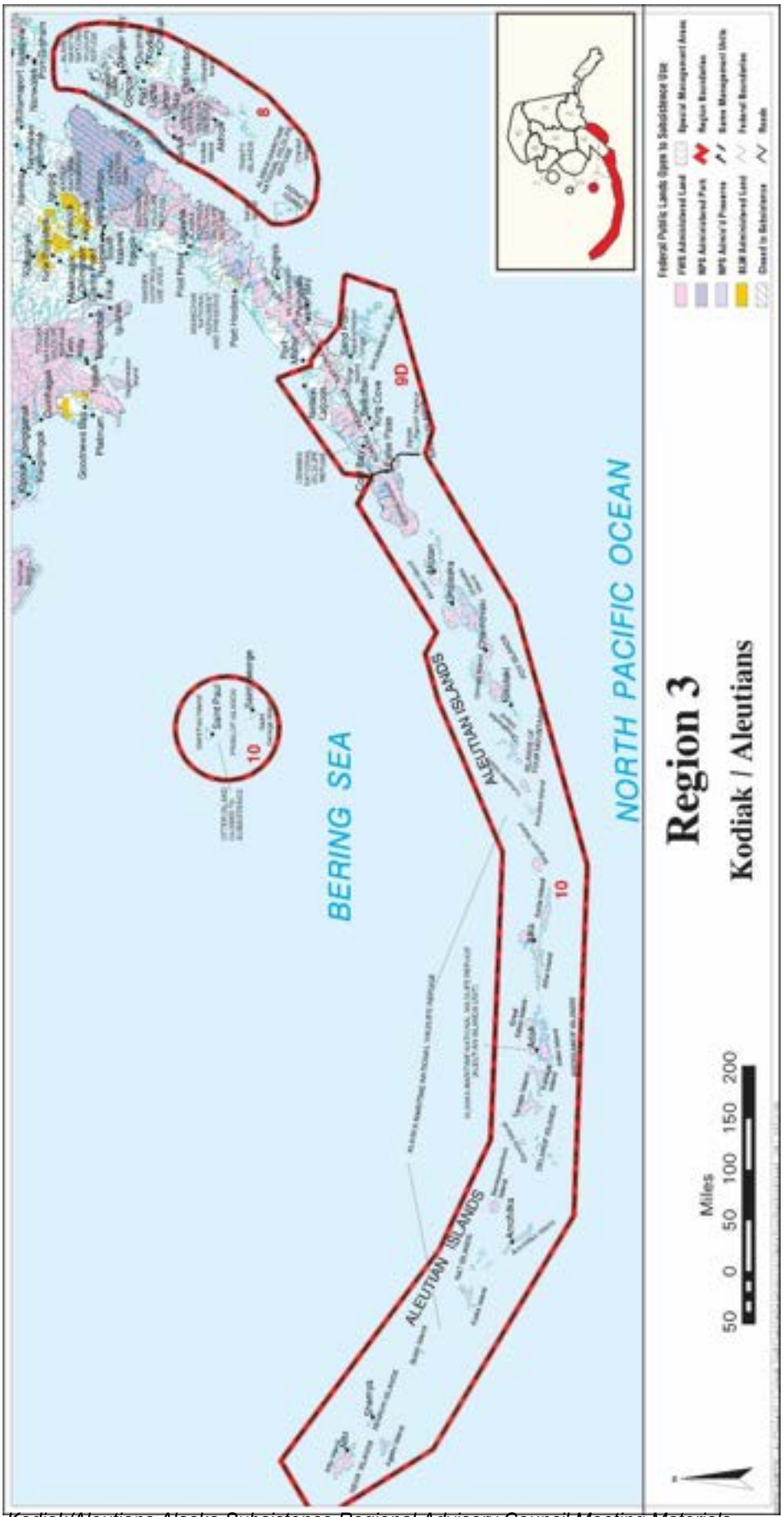
Region 3 - Kodiak/Aleutians Region Map



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Department of the Interior
U. S. Fish and Wildlife Service

Kodiak/Aleutians Subsistence Regional Advisory Council

Charter

1. Committee's Official Designation. The Council's official designation is the Kodiak/Aleutians Subsistence Regional Advisory Council (Council).

2. Authority. The Council is renewed by virtue of the authority set out in the Alaska National Interest Lands Conservation Act (ANILCA) (16 U.S.C. 3115 (1988)) Title VIII, and under the authority of the Secretary of the Interior, in furtherance of 16 U.S.C. 410hh-2. The Council is regulated by the Federal Advisory Committee Act (FACA), as amended, (5 U.S.C., Appendix 2).

3. Objectives and Scope of Activities. The objective of the Council is to provide a forum for the residents of the Region with personal knowledge of local conditions and resource requirements to have a meaningful role in the subsistence management of fish and wildlife on Federal lands and waters in the Region.

4. Description of Duties. Council duties and responsibilities, where applicable, are as follows:

a. Recommend the initiation, review, and evaluate of proposals for regulations, policies, management plans, and other matters relating to subsistence uses of fish and wildlife on public lands within the region.

b. Provide a forum for the expression of opinions and recommendations by persons interested in any matter related to the subsistence uses of fish and wildlife on public lands within the Region.

c. Encourage local and regional participation in the decision-making process affecting the taking of fish and wildlife on the public lands within the region for subsistence uses.

d. Prepare an annual report to the Secretary containing the following:

(1) An identification of current and anticipated subsistence uses of fish and wildlife populations within the Region;

(2) An evaluation of current and anticipated subsistence needs for fish and wildlife populations within the Region;

(3) A recommended strategy for the management of fish and wildlife populations within the Region to accommodate such subsistence uses and needs; and

(4) Recommendations concerning policies, standards, guidelines, and regulations to implement the strategy.

e. Make recommendations on determinations of customary and traditional use of subsistence resources.

f. Make recommendations on determinations of rural status.

g. Provide recommendations on the establishment and membership of Federal local advisory committees.

5. Agency or Official to Whom the Council Reports. The Council reports to the Federal Subsistence Board Chair, who is appointed by the Secretary of the Interior with the concurrence of the Secretary of Agriculture.

6. Support. The U.S. Fish and Wildlife Service will provide administrative support for the activities of the Council through the Office of Subsistence Management.

7. Estimated Annual Operating Costs and Staff Years. The annual operating costs associated with supporting the Council's functions are estimated to be $175,000, including all direct and indirect expenses and 1.0 Federal staff year.

8. Designated Federal Officer. The DFO is the Subsistence Council Coordinator for the Region or such other Federal employee as may be designated by the Assistant Regional Director – Subsistence, Region 11, U.S. Fish and Wildlife Service. The DFO is a full-time Federal employee appointed in accordance with Agency procedures. The DFO will:

(a) Approve or call all Council and subcommittee meetings;

(b) Prepare and approve all meeting agendas;

(c) Attend all committee and subcommittee meetings;

(d) Adjourn any meeting when the DFO determines adjournment to be in the public interest; and

(e) Chair meetings when directed to do so by the official to whom the advisory committee reports.

9. Estimated Number and Frequency of Meetings. The Council will meet 1-2 times per

year, and at such times as designated by the Federal Subsistence Board Chair or the DFO.

10. Duration. Continuing.

11. Termination. The Council will be inactive 2 years from the date the charter is filed, unless prior to that date, the charter is renewed in accordance with provisions of section 14 of the FACA. The Council will not meet or take any action without a valid current charter.

12. Membership and Designation. The Council's membership is composed of representative members as follows:

Ten members who are knowledgeable and experienced in matters relating to subsistence uses of fish and wildlife and who are residents of the region represented by the Council.

To ensure that each Council represents a diversity of interests, the Federal Subsistence Board in their nomination recommendations to the Secretary will strive to ensure that seven of the members (70 percent) represent subsistence interests within the region and three of the members (30 percent) represent commercial and sport interests within the region. The portion of membership representing commercial and sport interests must include, where possible, at least one representative from the sport community and one representative from the commercial community.

For geographic membership balance, it is a Council goal to seat four members who reside on the Kodiak Archipelago, three members who reside on the Alaska Peninsula, and three who reside on the Aleutian and Pribilof Islands.

The Secretary of the Interior will appoint members based on the recommendations from the Federal Subsistence Board and with the concurrence of the Secretary of Agriculture.

Members will be appointed for 3-year terms. Members serve at the discretion of the Secretary.

If appointments for a given year have not yet been announced, a member may continue to serve on the Council following the expiration of his or her term until such appointments have been made. Unless reappointed, the member's service ends on the date of announcement even if that member's specific seat remains unfilled.

Alternate members may be appointed to the Council to fill vacancies if they occur out of cycle. An alternate member must be approved and appointed by the Secretary before attending the meeting as a representative. The term for an appointed alternate member will be the same as the term of the member whose vacancy is being filled.

Council members will elect a Chair, Vice-Chair, and Secretary for a 1-year term.

Members of the Council will serve without compensation. However, while away from their homes or regular places of business, Council and subcommittee members engaged in Council, or subcommittee business, approved by the DFO, may be allowed travel expenses, including per diem in lieu of subsistence, in the same manner as persons employed intermittently in Government service under Section 5703 of title 5 of the United States Code.

13. Ethics Responsibilities of Members. No Council or subcommittee member will participate in any Council or subcommittee deliberations or votes relating to a specific party matter before the Department or its bureaus and offices including a lease, license, permit, contract, grant, claim, agreement, or litigation in which the member or the entity the member represents has a direct financial interest.

14. Subcommittees. Subject to the DFO's approval, subcommittees may be formed for the purpose of compiling information or conducting research. However, such subcommittees must act only under the direction of the DFO and must report their recommendations to the full Council for consideration. Subcommittees must not provide advice or work products directly to the Agency. Subcommittees will meet as necessary to accomplish their assignments, subject to the approval of the DFO and the availability of resources.

15. Recordkeeping. The Records of the Council, and formally and informally established subcommittees or other subgroups of the Council, must be handled in accordance with General Records Schedule 6.2, and other approved Agency records disposition schedules. These records must be available for public inspection and copying, subject to the Freedom of Information Act (5 U.S.C. 552).

____/signature on the filed original/_____ ____Dec. 10, 2021_____
Secretary of the Interior Date Signed

____Dec. 13, 2021_____
Date Filed

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