Federal Subsistence Board Work Session

January 28 - 29, 2020

Federal Building

Anchorage, Alaska

What's Inside…

FEDERAL SUBSISTENCE BOARD
WORK SESSION and EXECUTIVE SESSION

January 28 – 29, 2020
9:00AM – until finished (each day)
James M. Fitzgerald U.S. Courthouse and Federal Building
Denali Conference Room, 4th Floor
222 West 7th Ave.
Anchorage, Alaska

WORK SESSION AGENDA
*** Indicates Action Item**

1. Review and Adopt Agenda*

2. Information Exchange

3. Recommendations on the 2020 Fisheries Resource Monitoring Plan* (Greg Risdahl and Pippa Kenner)

    a. Northern Region
    b. Yukon Region
    c. Kuskokwim Region
    d. Southwest Region
    e. Southcentral Region
    f. Southeast Region

4. Request for Reconsideration RFR18-01, Unit 2 Deer* (Terry Suminski)

5. Partners for Fisheries Monitoring and Alaska Native Science and Engineering Program updates and introductions (Karen Hyer)

Audio Access Information:
Toll-Free: 1-888-566-1030
Pass Code: 3344290

EXECUTIVE SESSION AGENDA

To be held during the work session, timing at the discretion of the Chair.

1. Review Agenda
2. Information Exchange
3. OSM Staffing Update
4. Budget Discussion
5. April Regulatory Meeting Logistics

DRAFT 2020 FISHERIES RESOURCE MONITORING PLAN

OVERVIEW

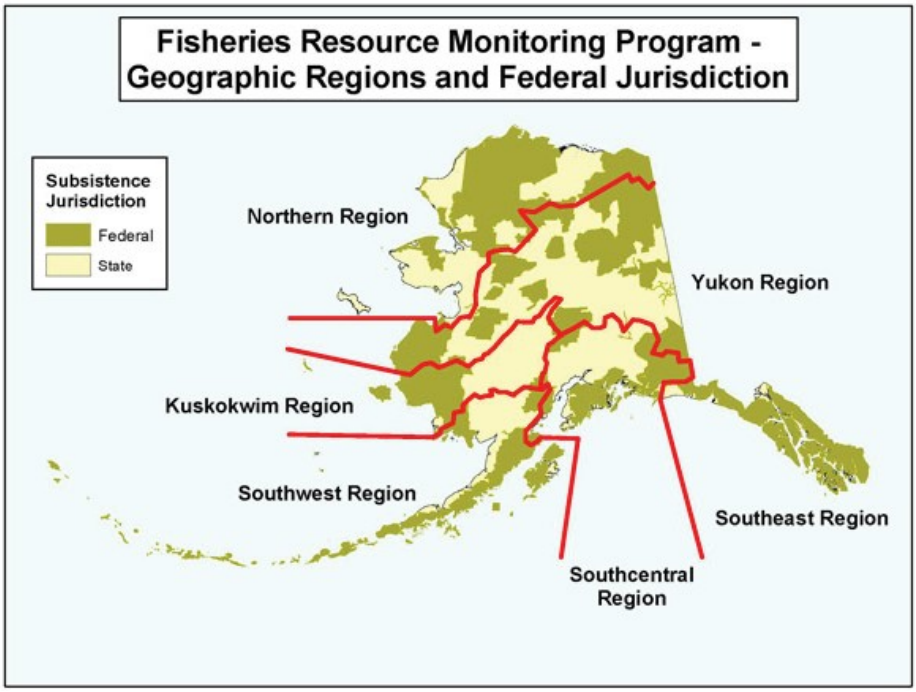
The mission of the Fisheries Resource Monitoring Program is to identify and provide information needed to sustain subsistence fisheries on Federal public lands for rural Alaskans through a multidisciplinary and collaborative program. It is the responsibility of the Monitoring Program to develop the strongest possible Monitoring Plan for each region and across the entire state.

The Monitoring Program's Technical Review Committee evaluated and ranked 28 project proposals for Strategic Priority, Technical and Scientific Merit, Investigator Ability and Resources, Partnership and Capacity Building, and Cost/Benefit. Of these proposals, five were for continuing projects currently funded through the Monitoring Program. High ranking projects comprise a strong Monitoring Plan for the region by addressing strategically important information needs based on sound science and promoting cooperative partnerships and capacity building. The highest ranking projects are currently being considered for funding in the 2020 Fisheries Resource Monitoring Plan.

Background

Section 812 of the Alaska National Interest Lands Conservation Act directs the Departments of the Interior and Agriculture, cooperating with other Federal agencies, the State of Alaska, and Alaska Native and other rural organizations, to research fish and wildlife subsistence uses on Federal public lands; and to seek data from, consult with, and make use of the knowledge of local residents engaged in subsistence. When the Federal government assumed responsibility for management of subsistence fisheries on Federal public lands in Alaska in 1999, the Secretaries of the Interior and Agriculture made a commitment to increase the quantity and quality of information available to manage subsistence fisheries, to increase quality and quantity of meaningful involvement by Alaska Native and other rural organizations, and to increase collaboration among Federal, State, Alaska Native, and rural organizations. The Fisheries Resource 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.

Every two years, the Office of Subsistence Management announces a funding opportunity for investigation plans addressing subsistence fisheries on Federal public lands. The 2020 Notice of Funding Opportunity focused on priority information needs developed by Federal Subsistence Regional Advisory Councils with input from strategic plans and subject matter specialists. The Monitoring Program is administered through regions to align with stock, harvest, and community issues common to a geographic area. The six Monitoring Program regions are shown below.



Strategic plans sponsored by the Monitoring Program have been developed by workgroups of fisheries managers, researchers, Regional Advisory Councils, and by other stakeholders for three of the six regions: Southeast, Southcentral (excluding Cook Inlet Area), and Southwest Alaska, and for Yukon and Kuskokwim drainages whitefish. These plans identify prioritized information needs for each major subsistence fishery. Individual copies of plans are available from the Office of Subsistence Management by calling (907) 786-3888 or toll free (800) 478-1456, by email subsistence@fws.gov, or by going to the Monitoring Program's web page https://www.doi.gov/subsistence/frmp/plans.

To implement the Monitoring Program, a collaborative approach is utilized in which five Federal agencies (U.S. Fish and Wildlife Service, Bureau of Land Management, National Park Service, Bureau of Indian Affairs, and U.S. Forest Service) work with the Alaska Department of Fish and Game, Regional Advisory Councils, Alaska Native and rural organizations, and other organizations. Projects are selected for funding through an evaluation and review process that is designed to advance projects that are strategically important for subsistence fisheries management, technically sound, administratively competent, promote partnerships and capacity building, and are cost effective.

Proposed projects are evaluated by a panel called the Technical Review Committee that provides scientific evaluation of investigation plans submitted for funding consideration. This committee is a standing interagency committee of senior technical experts foundational to the credibility and scientific integrity of the evaluation process for projects funded by the Monitoring Program. The Technical Review Committee reviews, evaluates, and makes recommendations about proposed projects consistent with the mission of the Monitoring Program. Fisheries and Anthropology staff from the Office of Subsistence Management provide support for the Technical Review Committee. Recommendations from the Technical Review Committee provide the basis for ranking proposals for funding, along with further

comments from 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.

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

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, including: 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, size, and sex 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, sonars, videos, genetics, mark-recapture, and telemetry.

Available Funds

Federal Subsistence Management Program guidelines direct initial distribution of funds among regions. While regional budget guidelines provide an initial target for planning, they are not final allocations. The anticipated funding available for the 2020 Monitoring Program is up to $1.8 million from the Department of the Interior and approximately $275,000 from the U.S. Department of Agriculture.

Interagency Staff Committee Comments on the 2020 Draft Monitoring Plan

The Interagency Staff Committee supports the evaluation approach described in the Monitoring Plan overview, which includes five specific criteria and prioritizes the highest ranking projects. We agree that the strongest Monitoring Plans will be comprised of high ranking projects that address priority information needs, are based on sound science, and promote cooperative partnerships and capacity building. We also acknowledge that with declining budgets, not all high ranking and strategically important projects can be funded.

NORTHERN ALASKA REGION

Priority Information Needs

The 2020 Notice of Funding Opportunity for the Northern Alaska Region identified the following six priority information needs:

- Inventory and baseline data of fish assemblages in major rivers of northern Seward Peninsula tied to subsistence use, including Shishmaref, with the intent to add to the anadromous fish catalog.

- Agiapuk River Chum Salmon abundance estimates for both summer and fall runs.

- Coho Salmon abundance estimates for Pargon, Boston, and Wagon Wheel Rivers.

- Changes in species compositions, abundance, and migration timing, especially of Dolly Varden and whitefish species in the Northwest Arctic area, to address changing availability of subsistence fishery resources. When possible, applicants are encouraged to include fisheries proximal to the communities of Kotzebue, Deering, and Noatak.

- The effects of expanding beaver populations and ranges on subsistence fisheries in the Northwest Arctic area. Includes the effects of dams on fish migration and the effects of changes to water quality on fish health.

- Document temporal changes in harvest patterns, resource availability and abundance of Broad Whitefish in the tributaries of Smith Bay and Lake Tusikvoak; including application to Federal subsistence management, such as identifying critical habitat, refining range maps and understanding ecological relationships. Identify spawning locations of Broad Whitefish in central and western North Slope areas.

Proposals Submitted in the Northern Alaska Region

Four proposals were submitted for funding in the Northern Alaska Region. They are listed in numerical order in **Table 1**, below.

In addition to the proposed projects, the following three projects are currently being funded by the Monitoring Program in the Northern Alaska Region:

- 18-100 Colville River Grayling Habitat and Migration
- 18-101 Kobuk River Dolly Varden Genetic Diversity
- 18-103 Unalakleet River Chinook Salmon Escapement Assessment

Table 1. Projects submitted for the Northern Alaska Region, 2020 Monitoring Program, including total funds requested and average annual funding requests.

Project Number	Title	Total Project Request	Average Annual Request
20-100	Fish Assemblages and Genetic Stock Determination of Salmon in Bering Land Bridge National Preserve	$316,800	$79,200
20-101	Life-history Variability and Mixed-stock Analysis of Dolly Varden in the Noatak River	$246,177	$82,059
20-150	Traditional Ecological Knowledge of Dolly Varden and Whitefish Species in Northwest Alaska	$172,684	$86,342
20-151	Increasing Beaver Activity in Northwest Alaska: Traditional Ecological Knowledge and Geospatial Analysis of Impacts to Subsistence Fish Resources	$486,070	$162,023
	Total	$1,221,731	$409,624

Regional Advisory Council Comments

Seward Peninsula Subsistence Regional Advisory Council

For Proposal 20-100 (Fish Assemblages and Genetic Determination of Salmon in Bering Land Bridge National Preserve), Council members had hoped to see larger rivers of the Seward Peninsula, such as the Koyuk, Kuzitrin, Fish, and Niukluk rivers, included in the proposal.

Northwest Arctic Alaska Subsistence Regional Advisory Council

Council members wanted to know why Project 20-151 investigators (Increasing Beaver Activity in Northwest Alaska) limited their investigations to the communities of Noatak, Kotzebue, Shungnak, and Kobuk, as the negative impacts of beaver activity have occurred region-wide. Council members asked to expand the project to more, or even all, communities in the region. Council members also had concerns about threats to water quality and safety caused by beaver activity.

North Slope Alaska Subsistence Regional Advisory Council

The Council deferred to other Regional Advisory Councils representing the Northern Alaska Region because all four proposals involved research outside of the North Slope Council area.

Interagency Staff Committee Comments

The Interagency Staff Committee supports the Technical Review Committee's assessment of the 2020 Northern Alaska Region proposals. We acknowledge the Seward Peninsula Subsistence Regional Advisory Council's disappointment that larger rivers of the southern Seward Peninsula were not included

in Project 20-100, while recognizing that the associated priority information need was specific to major rivers of the northern Seward Peninsula.

Technical Review Committee

The Technical Review Committee evaluated and scored each proposal on Strategic Priority, Technical and Scientific Merit, Investigator Ability and Resources, Partnership and Capacity Building, and Cost/Benefit. The Technical Review Committee's abbreviated reviews are provided below.

Project Number: 20-100
Project Title: Fish Assemblages and Genetic Stock Determination of Salmon in Bering Land Bridge National Preserve

Project Summary: This project would collect baseline information on fish species with an emphasis on salmon. Sampling sites would be identified by local knowledge gathered by investigators in 2019. Data collected would help to inform fish surveys to formally document fish, their habitats, and associated environmental variables. Sampling sites would be identified using local knowledge of salmon and nonsalmon species. Investigators have secured external funds to collect traditional ecological knowledge of salmon and nonsalmon species in Bering Land Bridge National Preserve during 2019. Investigators would gather information through a community meeting with Shishmaref residents, key respondent interviews and mapping. Genetic samples would be collected from salmon and biological data would be collected on all fish encountered.

Technical Review Committee: This project seeks to document the presence and distribution of important subsistence fish species that utilize Federal public lands within Bering Land Bridge National Preserve. Information on stock status, species distribution, and population age structure are lacking for this area with many of the major rivers surveyed only sporadically, or not at all. This project contains a linkage to Federal public lands for subsistence use as it focuses on the fisheries of Bering Land Bridge National Preserve. It involves several species of fish harvested by Federally qualified subsistence users and directly addresses a 2020 Priority Information Need: Inventory and baseline data of fish assemblages in major rivers of northern Seward Peninsula tied to subsistence use, including Shishmaref, with the intent to add to the anadromous fish catalog. The proposer intends to identify fish species and habitats within the Bering Land Bridge National Preserve. The project would then use biological methods to survey for these species. Research objectives would support effective management for several subsistence resources with a focus on salmon. This project proposes to build and increase capacity by using local hire to help with field sampling, but it does not describe any training that would build capacity. The proposal involves a partnership between State and Federal agencies. The principal investigator provided a letter of support from the Native Village of Shishmaref IRA Council.

Project Number: 20-101
Project Title: Life-history Variability and Mixed-stock Analysis of Dolly Varden in the Noatak River

Project Summary: This project seeks to investigate the changing availability of Dolly Varden by specifically using otolith microchemistry to determine life-history variability throughout the drainage and compare life-histories of present-day spawners and harvests to fish sampled in the early 1980s. Additionally, genetic research using mixed-stock analysis would help to identify the genetic makeup of spawning populations from harvested fish. This would enable fisheries managers to better understand the relative contribution of stocks in the subsistence harvest and identify potential changes in the population structure of Dolly Varden over the last 40 years.

Technical Review Committee: The investigation plan draws a clear connection between the importance of research and management implications for subsistence. Given the backgrounds of these investigators, it is likely the project goals and objectives would be achieved and project deliverables submitted in a timely manner. The investigator proposes to hire two locals each year to assist with the in-season collection of fish samples, and an Alaska Science and Engineering Program, or ANSEP, student to work in the field and laboratory alongside professional mentors to provide a meaningful internship. Additionally, this project would support a Master of Science thesis student's research at University of Alaska Fairbanks. Investigators have a proven track record and are employed in agencies that have the necessary administrative and technical support, and resources for the successful completion of the project. Each of the investigators is considered an expert in their field, including genetics, stable isotope microchemistry, and research of arctic fishes. All four investigators have completed Monitoring Program projects in the past and submitted deliverables on time. Project goals would likely improve our understanding of this complex fish species. Although Dolly Varden are not currently considered to be a species of conservation concern, the changing climate of the Arctic may produce new environmental stressors leaving this species at risk.

Project Number: 20-150
Project Title: Traditional Ecological Knowledge of Dolly Varden and Whitefish Species in Northwest Alaska

Project Summary: This two-year project intends to document traditional ecological knowledge of Dolly Varden and whitefish species held by residents of Noatak, Kotzebue, and Deering. The investigator intends to work with tribal councils to manage the logistics of scheduling and conducting fieldwork. Employing participant observation and semi-structured interviews, the investigator would map historical and contemporary harvest locations and contribute to local capacity building by utilizing a framework of community involvement in the research.

Technical Review Committee: This project seeks to address a 2020 Priority Information Need for the Northern Alaska Region, "Changes in species compositions, abundance and migration timing, especially of Dolly Varden and whitefish species in the Northwest Arctic, to address changing availability of subsistence fishery resources." Ms. Mikow has the ability and experience to conduct this project. She would have substantial resources available through her position with the Alaska Department of Fish and

Game. Her plan for engaging with communities is well-conceived. However, the proposal does not adequately demonstrate how the planned research activities would address the relevant priority information need; and management application is not clearly demonstrated. One letter of support from the National Park Service was provided. There were no letters of support from communities where the proposed research would be undertaken.

Project Number: 20-151
Project Title: Increasing Beaver Activity in Northwest Alaska: Traditional Ecological Knowledge and Geospatial Analysis of Impacts to Subsistence Fish Resources

Project Summary: This project would document and describe the relationship between beavers and subsistence fisheries, and to collect and analyze quantitative spatial data related to beaver range expansion and interaction with the environment. The proposal seeks to use traditional ecological knowledge, satellite imagery, and drone imagery to assess visible impacts of beaver activity on the landscape in the Northwest Arctic area.

Technical Review Committee: This project would document beaver activity over time in the Northwest Arctic area for the purpose of evaluating landscape level effects of expanding beaver populations on subsistence fisheries. While the methods proposed appear adequate to document knowledge and concerns regarding beavers, as well as visible landscape effects of beaver dams, the project does not adequately link the resultant data to the effects on subsistence fisheries and only marginally addresses a priority information need. The proposed methods are scientifically sound and proven in achieving the intended results though it is unclear why individual methods were chosen over others. The partnership and capacity components of this proposal are limited. The budget for this project appears reasonable for meeting stated objectives but may be high given the limited applicability to Federal subsistence fishery management outcomes. There is also limited money allocated to local hires. The project leverages resources from a concurrent project and expands the scope of that project significantly. Both project investigators and their associated organizations appear to have substantial experience and resources to make this project successful.

YUKON REGION

Priority Information Needs

The 2020 Notice of Funding Opportunity identified the following 13 priority information needs in the Yukon Region:

- Reliable estimates of Chinook, Summer Chum, Fall Chum, and Coho salmon escapements, particularly sub-stocks that are large contributors to the total run.

- In-season estimates of genetic stock composition of Chinook, Summer Chum, and Fall Chum salmon runs and harvests.

- Baseline information about geographic distribution, migration patterns, run timing, genetic structure, and tributary escapements of Yukon River Coho Salmon. Projects might focus on those portions of the Yukon River drainage downriver from and including the Tanana River.

- Reliable assessment of Porcupine River Fall Chum Salmon, for example, migration characteristics, abundance, escapement, and harvest quantities.

- Reliable quantitative and/or qualitative estimates of age-sex-length and genetic composition of salmon harvested in the subsistence fishery. Applicants are encouraged to focus on Chinook and Fall Chum salmon.

- Advance genetic baselines for Chinook, Summer Chum, and Fall Chum salmon by screening novel genetic markers to improve the accuracy, precision, and scale of stock-composition estimates to inform stock assessment.

- Reliable methods of forecasting Chinook, Summer Chum, Fall Chum, and Coho salmon run abundance.

- Quality of escapement measures for Chinook Salmon, for example, potential egg deposition, age, sex, and size composition of spawners, percentage of females, percentage of jacks, and spawning habitat utilization.

- Bering Cisco population assessment.

- Information sharing between stakeholders and agencies concerning management of subsistence fisheries.

- Baseline information about lamprey populations, migration patterns, and harvest quantities.

- Baseline information about whitefish populations, migration patterns, and harvest, particularly those where habitat and traditional harvest practices could be affected by proposed road and mine development.

- Quantify and qualify the barter and cash exchange of salmon within the context of the social, cultural, and economic life of people in the middle and lower Yukon drainage.

- Assessment of incidental mortality with gillnets, dip nets, and seines, with particular consideration for delayed mortality from entanglement from drop-outs and live release of Chinook Salmon (for example, loss of Chinook Salmon from 6-inch mesh nets during Chum Salmon fisheries and the live release of Chinook Salmon from dip nets and seines).

- Strategic evaluation of existing and needed information concerning Chinook Salmon and Summer Chum Salmon run timing, escapement, and population in the middle and upper Yukon drainage, particularly the Middle Fork Koyukuk River.

- Analysis of recent regulations changes and effects on salmon escapement in the Yukon River drainage.

- Reliable quantitative and/or qualitative estimates of in-season salmon harvest to support management.

Proposals Submitted for the Yukon Region

Eight proposals were submitted for funding in the Yukon Region. They are listed in numerical order in **Table 2**, below.

In addition to proposed projects, the following five projects are currently being funded by the Monitoring Program in the Yukon Region:

- 18-201 East Fork Andreafsky River Chinook and Summer Chum Salmon Abundance and Run Timing
- 18-202 Gisasa River Chinook and Summer Chum Salmon Abundance and Run Timing
- 18-250 Documentation of Salmon Spawning and Rearing in the Upper Tanana River Drainage
- 18-251 Traditional Knowledge of Anadromous fish in the Yukon Flats Draanjik Basin
- 18-252 Subsistence Salmon Networks in Yukon River Communities

Regional Advisory Council Comments

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

Council member comments focused on Project 20-252 (Customary Trade in the Lower and Middle Yukon River). One member was concerned this project would include communities in only middle and lower Yukon River communities and that upper river communities should be included as well. A second member agreed and would like to see customary trade studied in every part of the drainage. A Council member also described a persistent pattern of sharing of subsistence foods, even during times of conservation.

Table 2. Projects submitted for the Yukon Region, 2020 Monitoring Program, including total funds requested and average annual funding requests.

Project Number	Title	Total Project Request	Average Annual Request
20-200	Yukon River Coho Salmon Radio Telemetry	$456,219	$152,073
20-201	Application of Mixed-stock Analysis for Yukon River Chum Salmon	$518,128	$129,532
20-202	Evaluating Dart and Telemetry Tags in an Effort to Track Run Timing and Migration Patterns of Yukon River Arctic Lamprey	$33,836	$16,918
20-204	Abundance and Run Timing of Adult Salmon in Henshaw Creek, Kanuti National Wildlife Refuge	$733,256	$183,314
20-250	Fall Chum Salmon Community Outreach along the Yukon River	$70,341	$23,447
20-251	In-season Yukon River Subsistence Salmon Survey Program	$320,756	$80,189
20-252	Customary Trade in the Lower and Middle Yukon River	$310,487	$103,496
20-256	Yukon River In-Season Salmon Management Teleconferences	$78,854	$19,713
Total		$2,521,887	$708,682

Western Interior Alaska Subsistence Regional Advisory Council

The Council thought all of the projects worthwhile and did not see any specific problem. One Council member stated Project 20-200 (Yukon River Coho Salmon Telemetry) was worthwhile because Yukon Coho Salmon have been little studied, including their distribution. This Council member also stated that data from the Henshaw Creek weir have been important because a large component of the Yukon Summer Chum Salmon run occurs in Henshaw Creek.

Eastern Interior Alaska Subsistence Regional Advisory Council

Several Council members commented that Project 20-256 (Yukon River In-season Salmon Management Teleconferences) has been providing good information to subsistence users on management decisions and timing of fishing opportunities. In addition, several Council members mentioned that lamprey were important to study (Project 20-202 Migration Patterns of Yukon River Arctic Lamprey) because of the commercial lamprey fishery and lack of documented knowledge concerning lamprey. One Council member thought Project 20-252 (Customary Trade in the Lower and Middle Yukon River) was an important project because it would collect good information about how customary trade has changed over time. This member also thought Proposal 20-201 (Application of Mixed-Stock Analysis for Yukon River Chum Salmon) would provide important information for managers.

Interagency Staff Committee Comments

The Interagency Staff Committee supports the Technical Review Committee's assessment of the 2020 Yukon Region proposals. We concur with the Eastern Interior Alaska Subsistence Regional Advisory Council's desire for information on the Yukon River Arctic Lamprey in light of the commercial lamprey fishery (Project 20-202). There is mutual support for the project Customary Trade in the Lower Middle Yukon River (Project 20-252) by the Interagency Staff Committee and the Yukon Kuskokwim Delta and Eastern Interior Alaska Subsistence Regional Advisory Councils. Across the three Regional Advisory Councils, there was support for the suite of projects addressing fish species management, customary trade, and partnership with in-river fishers. Proposed projects address a majority of the Yukon Region Priority Information Needs.

Technical Review Committee

The Technical Review Committee evaluated and scored each proposal on Strategic Priority, Technical and Scientific Merit, Investigator Ability and Resources, Partnership and Capacity Building, and Cost/Benefit. The Technical Review Committee's abbreviated reviews are provided below.

Project Number: 20-200
Project Title: Yukon River Coho Salmon Radio Telemetry

Project Summary: Investigators seek funding to conduct a Coho Salmon radio telemetry project on the Yukon River and its tributaries. Capture would occur at Russian Mission on the Lower Yukon River using drift gill nets as Coho progress through the area. A total of 300 Coho Salmon would receive esophageal radio tags as well as uniquely numbered spaghetti tags attached for visual identification. Radio tracking would occur throughout the main-stem of the Yukon River and tributaries to determine the fate of tagged fish. The main objectives include identifying migration routes, spawning locations, run timing, migration rates, distribution, and proportional contributions of fish from different spawning stock groups to the overall Yukon River Coho Salmon population. This is a three year project that is broken into three phases: the first year is spent setting up telemetry sites and purchasing equipment; the second year would involve tagging and tracking Coho Salmon; report writing would occur during the third year.

Technical Review Committee: The objectives of this project would be to identify migration routes, spawning locations, run timing, migration rates, distribution, and proportional contributions of fish from different spawning stock groups to the overall Yukon River Coho Salmon population. Radio tracking would only occur during the second year of the project, and would not document the inter-annual variability in run timing and stock productivity, increasing the risk of funding a project of this magnitude. This project fully addresses one priority information need. Information from this project would lead investigators to locations to focus on escapement monitoring and sample collection to add to the genetic baseline; however, the proposal does not adequately describe how the project addresses subsistence concerns. The project has objectives that are clear, measurable, and achievable, with well thought out logistics. The investigators have experience with these types of projects, and have successfully performed them in this drainage in the past. However, as in the 2018 project proposal, there is little information on how they determined sample size, or if it would have the resolution to meet objective 3 (Estimate

proportional contributions of fish from five drainage groups to the overall Yukon River Coho Salmon population with 95% confidence interval bounds that would be no wider than 7% of the mean).

There has been significant partner involvement with the development of this proposal by the Alaska Department of Fish and Game, Yukon Delta Fishermen's Association, and the U.S. Fish and Wildlife Service. Capacity would be built by training local hires in sampling techniques and data entry. The total projected cost is $771,251 for the three years of the project. The investigators are asking for a total of $456,219 from the Monitoring Program with an average annual cost to the Monitoring Program of $152,073. The remainder would come from the Alaska Department of Fish and Game, the U.S. Fish and Wildlife Service, and Yukon Delta Fishermen's Association.

Project Number: 20-201
Project Title: Application of Mixed-stock Analysis for Yukon River Chum Salmon

Project Summary: Investigators seek funding to resume in-season mixed stock genetic analysis of Yukon River Summer and Fall Chum Salmon. The samples, collected in conjunction with the Pilot Station sonar run by the Alaska Department of Fish and Game, would be shipped to the U.S. Fish and Wildlife Service Genetics Conservation Lab in Anchorage for analysis. Stock composition estimates would be available to fisheries managers within 24 to 48 hours of receiving the samples, supporting in-season management of Chum Salmon as the stocks progress up the Yukon River. Investigators would contract with the Association of Village Council Presidents for local hires to collect genetic samples from the apportionment sampling associated with the Pilot Station sonar program.

Technical Review Committee: This project directly addresses one Priority Information Need. The objectives are clear, measurable, and achievable with a sampling design that is rigorous. The investigation plan includes reporting procedures, although the annual reports would not be completed for almost two years after the field season is completed, which may be an excessive delay. No letters of support were submitted with this project and it is suggested that the investigators ask their partners and other entities in the region to submit letters of support in the future. There is very little capacity built with this project, however, some technical capacity would be built by training a local hire in proper sampling techniques. The investigation plan suggests a total project cost of $628,128 for four years of the project, of which $110,000 is a match from the U.S. Fish and Wildlife Service Conservation Genetics Lab. The average annual cost to the Monitoring Program is $129,532. The cost of the proposal is reasonable throughout all agreement periods and is reasonable for the work being proposed.

Project Number: 20-202
Project Title: Evaluating Dart and Telemetry Tags in an Effort to Track Run Timing and Migration Patterns of Yukon River Arctic Lamprey

Project Summary: Investigators propose a two-year project to determine the tag retention and optimal radio transmitter size to mark and track Arctic Lamprey. They intend to capture 225 adult Arctic Lamprey during the fall of 2020 and 2021 at the mouth of the Yukon River and ship them to the University of Fairbanks. From there the lamprey would be placed into six treatment groups and held in circular tanks. Treatment groups include: (1) control; (2) sham; (3) an external plastic-dipped dart tag; (4) a surgically

implanted small-sized dummy transmitter (3 x 5 x 9.6 mm); (5) a surgically implanted medium-sized dummy transmitter (5 x 5.2 x 11 mm); and (6) a surgically implanted large-sized dummy transmitter (8.2 x 15 mm). Treatments would be run from November 1- January 31 each fall. Results from this project can be used to determine the best tags to use for a mark/recapture and distribution project in the future.

Technical Review Committee: This project has a direct link to Federal public waters on the Yukon River; however, geographic implications are relatively small. This project fully addresses one Priority Information Need. The proposed project would not have immediate management applications; however, it would give researchers necessary information regarding tag use for mark/recapture or distribution for future studies. The objectives for this project are clear, measurable, and achievable. The science they propose is proven; however, some of the logistics need to be described in more detail. The methods have a rigorous sampling design and have been proven to achieve technical results in previous studies using Pacific Lamprey that would likely transfer to the study of the slightly smaller Arctic Lamprey. Investigators have substantial resources available to accomplish a project of this nature. The Yukon Delta Fisheries Development Association and the Asa'carsarmiut Tribal Council submitted letters of support for this project proposal. This project has four partners, three of which would be involved in a meaningful way. This project would build very little capacity since the Yukon Delta Fisheries Development Association has fishermen already sampling most years. The proposal included both the budget justification and budget tables and suggests a total project cost of $107,940 for two years of the project, of which $74,104 is in-kind services and voluntary uncommitted resources from the U.S. Fish and the Alaska Department of Fish and Game. The average annual cost to the Monitoring Program is $16,918, with in-kind services and voluntary uncommitted resources equaling approximately 69% of the total project cost.

Project Number: 20-204
Project Title: Abundance and Run Timing of Adult Salmon in Henshaw Creek, Kanuti National Wildlife Refuge

Project Summary: Investigators are requesting four more years of funding to continue operation of the Henshaw Creek weir to monitor salmon escapement. This weir documents daily escapement, run timing, and age, sex, and length composition of adult salmon. The project also enumerates resident fish species passing the weir, provides outreach and communication for the village of Allakaket, and serves as an outreach platform for Tanana Chiefs Conference and Kanuti National Wildlife Refuge staff at an onsite science camp.

Technical Review Committee: Henshaw Creek weir is located within Federal public waters on the Yukon River drainage and contains wide geographic implications. The Henshaw Creek weir is the only upper Koyukuk River drainage escapement project and is valuable for providing stock-specific population demographic information for managing fisheries stocks throughout the drainage, but the value of the weir data for in-season management is limited due to its location in the upper Koyukuk River drainage, The project objectives are clear, measurable and achievable, but do not provide adequate justification for continuing this project given other information needs. The methods used produce technically sound results and the sampling design is rigorous and includes clear procedures for data collection, compilation,

analysis and reporting. The investigators have the resources and ability to fully complete this project and have demonstrated their ability in the past. Three letters of support were supplied from the following agencies: Alaska Department of Fish and Game, U.S. Fish and Wildlife Service, Fairbanks Fish and Wildlife Conservation Office, and Kanuti National Wildlife Refuge. Capacity would be built by hiring from local villages and training employees, as has been done in the past. The proposal included a budget table and justification with a total project cost of $782,056 for the four years of the project, of which $48,800 is an in-kind match from Tanana Chiefs Conference. The average annual cost to the Monitoring Program is $183,314, a decrease over the average annual amount of $212,345 in the 2016 project budget.

Project Number: 20-250
Project Title: Fall Chum Salmon Community Outreach along the Yukon River

Project Summary: Investigators plan to facilitate meetings between Alaska Department of Fish and Game managers and communities. Specifically, one staff member from the Division of Subsistence and one staff member from the Division of Commercial Fisheries would travel to the upper Yukon villages of Kaltag, Galena, Tanana, Beaver, Fort Yukon, and Eagle to meet with community members immediately prior to or during the Fall Chum Salmon run, and administer a short survey on management concerns.

Technical Review Committee: This project addresses a 2020 Priority Information Need for the Yukon Region: "Information sharing between stakeholders and agencies concerning management of subsistence fisheries." The investigators plan to facilitate meetings between Alaska Department of Fish and Game managers and communities. Ms. Trainor has the experience and ability to carry out the proposed work. The Alaska Department of Fish and Game has a demonstrated track record of successfully completing Monitoring Program projects. The project objectives are tangible, but may be difficult to measure. The proposal could have been strengthened through planning of concrete meetings in early consultation with tribal communities. Letters of support were not included. Inclusion of Federal managers and partnership with prominent rural organizations are missing. As written, the project comes with a relatively large cost in proportion to the short period of interaction between managers and fishing communities.

Project Number: 20-251
Project Title: In-season Yukon River Subsistence Salmon Survey Program

Project Summary: This proposal is a continuation of the In-season Yukon River Subsistence Salmon Survey Program that provides fisheries managers and community members with a means to gather input, assess harvests, and share information pertaining to Chinook Salmon fisheries in the Yukon River. Local fishers provide weekly reports on concerns, fishery success, and observations to a locally hired surveyor in ten Yukon River drainage villages. The resultant anonymous information is shared among village representatives, State and Federal managers to affect fisheries management decisions and to build capacity for fishery participation.

Technical Review Committee: This proposal is to maintain and build upon the existing In-season Yukon River Subsistence Salmon Survey Program. The program hires local surveyors from 10 Yukon River drainage communities to collect in-season salmon harvest information and fishery observations that are shared with communities and managers in real time. This information has been critical to managing

the Yukon River salmon fishery and in providing critical information needed to make management and fishing decisions. The proposal directly addresses several 2020 Priority Information Needs in the region. It develops essential partnerships between communities and managers to strengthen the capacity of each in making decisions in support of both conservation and the continuation of subsistence uses. The program provides local employment opportunities and builds capacity through training on both biological and anthropological research methods. Investigator organizations have a long history of providing substantial resources for Monitoring Program projects. Investigators have a proven record of completing Monitoring Program projects and in delivering high quality research products. The costs associated with this program appear reasonable, especially given the scope of data and anticipated impact on management and local participation in the fishery.

Project Number: 20-252
Project Title: Customary Trade in the Lower and Middle Yukon River

Project Summary: Investigators propose to increase understanding of customary trade along the middle and lower Yukon drainage communities of Mountain Village, Nunam Iqua, Kaltag, and Galena through participant observation, semi-structured interviews, and surveys. Previous work on the Yukon River has characterized customary trade through qualitative and quantitative approaches. Investigators plan to extend the approach employed in recent Alaska Department of Fish and Game research on customary trade on the upper Yukon to their proposed work on the lower and middle Yukon River.

Technical Review Committee: This project sets out to address a Monitoring Program 2020 Priority Information Need for the Yukon Region: "Quantify and qualify the barter and cash exchange of salmon within the context of the social, cultural, and economic life of people in the middle and lower Yukon drainage." In 2013, a regulation was adopted that prevents customary trade of salmon between Federally qualified users and non-Federally qualified users. Investigators have planned a study of customary trade combining surveys, participant observation, and semi-structured interviews in the middle and lower Yukon River communities of Mountain Village, Nunam Iqua, Kaltag, and Galena. Ms. Trainor plans to extend the approach used in recent Alaska Department of Fish and Game research on customary trade on the upper Yukon to the lower and middle Yukon River, creating a comparable dataset. The project is technically well-designed and has scientific merit. The investigators recognize and make provisions for the sensitive nature of customary trade. Although costs are high, the budget appears to be reasonable for the work proposed across all periods of the proposed study. No letters of support were provided. The project would increase capacity through training community members in research methods.

Project Number: 20-256
Project Title: Yukon River In-Season Salmon Management Teleconferences

Project Summary: This proposal continues the Yukon River In-season Salmon Management Teleconferences with the objective of providing a forum for the sharing of fishery information between stakeholders and the State and Federal managers. It provides interested parties with the opportunity to participate in weekly in-season salmon management teleconferences to get first-hand information during the fishing season, to have management questions addressed, and to share traditional ecological knowledge. Stakeholders across a large geographic area can communicate common salmon management

conservation and management challenges. This is also a forum for local fishery surveyors from another project to report on their communities harvest observations and needs.

Technical Review Committee: This continuing project hosts weekly teleconferences, bringing people together from remote and rural villages that share salmon resources. The project has operated for 17 years and has become a fixture of in-season salmon management along the Yukon River. Study design is appropriate and builds capacity by involving local subsistence users and providing them a voice to participate in the management of the Chinook Salmon fishery. The budget and project duration are reasonable for the proposed work and to accomplish project objectives. Investigators are highly qualified and fully capable of addressing and achieving the objectives, and reporting results in a timely manner.

KUSKOKWIM REGION

Priority Information Needs

The 2020 Notice of Funding Opportunity identified the following 13 priority information needs for the Kuskokwim Region:

- Documentation of oral histories describing salmon harvest methods in the Kuskokwim River drainage, specifically the period before the development of the modern commercial fishery.

- Documentation of local knowledge concerning how salmon subsistence harvest restrictions have affected people's uses of fish and other resources in the Kuskokwim River drainage.

- Reliable quantitative and/or qualitative estimates of salmon run size, escapement, and harvest in the Kuskokwim River drainage including Kuskokwim Bay tributaries.

- Estimates of "quality of escapement" measures to help inform salmon stock assessments, for example potential egg deposition, age, sex, and size composition of spawners, advancing genetic baselines.

- New methods for conducting in-season salmon run assessments in the Kuskokwim River drainage, for example community-based harvest monitoring, sonar, and village test fisheries

- Improved Kuskokwim River drainage-wide and sub-stock specific salmon run size and timing forecasts.

- Distribution, abundance, condition, and survival of juvenile and out-migrating salmon in the Kuskokwim River drainage.

- Improved methods to estimate Chinook Salmon sub-stock specific run abundance, run timing, and harvest in the Kuskokwim River drainage.

- Traditional ecological knowledge of salmon.

- Information sharing between stakeholders and agencies concerning salmon conservation in the Kuskokwim River drainage, for example outreach to villages using the media and other methods.

- A spatially robust indexing method for estimating species-specific whitefish harvests on an annual basis and/or geographic distribution and abundance of whitefish species.

- Traditional ecological knowledge of whitefish species. Groups of communities might include Kalskag, Lower Kalskag, Aniak, and Chuathbaluk, or Red Devil, Sleetmute, and Stony River.

- The meaning and significance of sharing, barter, and/or customary trade of subsistence foods in the context of the social, cultural, and economic life of people in the lower Kuskokwim drainage.

Proposals Submitted for the Kuskokwim Region

Eight proposals were submitted for funding in the Kuskokwim Region. They are listed in numerical order in **Table 3**, below.

Table 3. Projects submitted for the Kuskokwim Region, 2020 Monitoring Program, including total funds requested and average annual funding requests.

Project Number	Title	Total Project Request	Average Annual Request
20-301	Kuskokwim River Coho Salmon Abundance Estimation and Whitefish Indices Using Sonar	$417,750	$104,437
20-302	Salmon River of the Pitka Fork Chinook Salmon Escapement Monitoring	$423,257	$105,814
20-303	Middle Kuskokwim River Chinook and Chum Salmon In-season Assessment	$368,988	$92,247
20-308	Kwethluk River Salmon Run Timing and Abundance	$726,333	$181,583
20-350	Community-based Harvest Monitoring Network for Kuskokwim River Chinook Salmon	$460,724	$115,181
20-351	Food Knowledge and Place Name Documentation on the Kuskokwim River: Continuity and Change	$858,708	$214,677
20-352	Improving Communication and Outreach in the Kuskokwim River Drainage	$231,806	$77,269
20-353	Subsistence Harvest, Use, and Local and Traditional Knowledge of Whitefishes in the Middle Kuskokwim River	$335,396	$111,799
Total		$3,822,962	$1,003,007

In addition to the above proposed projects, the following three projects are currently being funded by the Monitoring Program in the Kuskokwim Region:

- 18-304 George River Salmon Weir
- 18-350 Bethel Subsistence In-season Salmon Harvest Surveys
- 18-351 Kuskokwim Area Post Season Subsistence Salmon Harvest Surveys

Regional Advisory Council Comments

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

The Council thought Proposals 20-352 (Improving Communication and Outreach in the Kuskokwim River Drainage) and 20-350 (Community-Based Harvest Monitoring Network for Kuskokwim River

Chinook Salmon) were very similar because both involve surveys. Council members said people have found constant surveying tiresome. Council members suggested implementing one comprehensive survey combining harvest monitoring and networking questions. The Council had concerns that if local residents were subjected to more surveys, then they would decline to participate because of survey fatigue. One Council member mentioned how well Project 20-308 (Kwethluk River Salmon Run Timing and Abundance) operated during 2019. Crew morale was high, and the summer season went smoothly.

Western Interior Alaska Subsistence Regional Advisory Council

The Council stated all of the proposed projects were worthy of funding. Council members said Project 20-302 (Salmon River of the Pitka Fork Chinook Salmon Escapement Monitoring) has been very important due to the recent passage of nearly 6,000 Chinook Salmon into the Pitka Fork, evidence of the success of conservation measures.

Interagency Staff Committee Comments

The Interagency Staff Committee supports the Technical Review Committee's assessment of the 2020 Kuskokwim Region proposals. Both Yukon-Kuskokwim Delta and Western Interior Alaska Subsistence Regional Advisory Councils support most of the proposed projects, which assist salmon management and/or are focused on traditional knowledge. The proposed studies address a majority of the Kuskokwim Region Priority Information Needs. We recognize the Yukon Kuskokwim Delta Subsistence Regional Advisory Council's desire to avoid household survey fatigue and support not funding the two projects (20-350 and 20-352) requesting to conduct additional household surveys. Project 20-351 (Food Knowledge and Place Name Documentation on the Kuskokwim River: Continuity and Change) is an expansive study, with a correspondingly large budget. While the documentation of elder knowledge regarding the harvest and use of salmon could benefit managers, other components may have limited applicability to the Federal Subsistence program. If dollars are available to support 20-351, we suggest that Monitoring Program funding focus on aspects with direct utility for Federal managers.

Technical Review Committee

The Technical Review Committee evaluated and scored each proposal on Strategic Priority, Technical and Scientific Merit, Investigator Ability and Resources, Partnership and Capacity Building, and Cost/Benefit. The Technical Review Committee's abbreviated reviews are provided below.

Project Number: 20-301
Project Title: Kuskokwim River Coho Salmon Abundance Estimation and Whitefish Indices Using Sonar

Project Summary: Investigators propose to add an additional month (August) to operate dual sonars and implement a drift gillnet apportionment method to more fully and accurately enumerate adult runs of Coho Salmon and whitefish in the Kuskokwim River mainstem. The first two years of the sonar operation was a feasibility study and investigators found that the site and methods used to apportion salmon were successful. However, the duration of the season was not long enough to capture the entire Coho Salmon

run. Results from this project could eliminate the need to estimate Coho Salmon abundance through complicated run-reconstruction models. Additionally, with the increased interest in both commercial and subsistence harvest of Coho Salmon and whitefish, this project would provide current abundance information to in-season managers and the first ever mainstem index of migrating whitefish species.

Technical Review Committee: Restrictions placed on subsistence Chinook Salmon harvest in the past has resulted in an increase in the harvest of other salmon species, particularly Coho Salmon. In this funding request, the Alaska Department of Fish and Game proposes to add one month (August) to an existing Monitoring Program project (18-305) to more fully and accurately estimate the abundance of Coho Salmon and migrating whitefish in the mainstem of the Kuskokwim River using sonars and gillnet apportionment. If funded, this project would directly address two 2020 Priority Information Needs (provide reliable quantitative estimates of salmon run size and escapements and abundance indices of whitefish species). The annual average cost of the project ($104,000) appears high, considering there is only three to four weeks of work proposed each season. One local hire, selected by the Orutsararmiut Native Council, would gain experience and training in the use of the sonar and apportionment methods, thereby increasing local technical capacity. A robust list of local stakeholders has given their support for this project, indicating considerable communication with nearby communities has occurred. The partnership between the Alaska Department of Fish and Game and the Orutsararmiut Native Council is meaningful and provides the opportunity for building local technical capacity; specifically, by on-site training of a local technician providing experience working the drift-gillnet and learning how to operate and count fish from a sonar. The technician and the co-investigator would both travel to nearby communities to give presentations on the sonar operation and monitoring results.

Project Number: 20-302
Project Title: Salmon River of the Pitka Fork Chinook Salmon Escapement Monitoring

Project Summary: Investigators request four years of funding to continue operating a fixed picket weir to estimate adult returns of Chinook Salmon as an index to escapement on the Salmon River of the Pitka Fork, upriver from McGrath in the headwaters of the Kuskokwim River. From previous telemetry studies, the Pitka Fork was found to have the single largest concentration of Chinook Salmon above McGrath (38% of total marked fish). Local and traditional knowledge, combined with eight years of intensive mark-recapture studies, indicate that the Pitka Fork may be the best location for indexing Chinook Salmon escapement to the headwaters.

Technical Review Committee: The proposal directly addresses a 2020 Priority Information Need (obtain reliable quantitative estimates of salmon escapements and estimates of "quality of escapement" measures, for example age, sex, length composition, in the Kuskokwim River drainage) and fulfills the need for an on-the-ground salmon monitoring project in the upper Kuskokwim River drainage. This is in contrast to aerial surveys, which do not capture age, sex, length, or other critical run timing data. Information and data gathered from this project would be directly applied to management of important subsistence fisheries and aid in the postseason decisions made by fisheries managers. Even though a majority of the harvest occurs downriver of this weir, this data has still been important for fisheries managers to understand how well harvest opportunity windows worked and if escapement goals were

met. The proposed investigation plan is technically sound and the project objectives are clear, measurable, and achievable. Alaska Department of Fish and Game investigators and McGrath Takotna Nikolai Telida (MTNT) Energy LLC co-investigators have a successful track record for managing past projects and submitting all deliverables on time. This project identified areas to be more cost efficient and is now one of the most cost-effective weirs proposed on the Kuskokwim River for the management of Chinook Salmon. Investigators are encouraged to add a detailed justification in future proposals regarding why continued funding support is needed for a long-term weir such as the Pitka Fork weir.

Project Number: 20-303
Project Title: Middle Kuskokwim River Chinook and Chum Salmon In-Season Assessment

Project Summary: Through this four-year project, the investigator proposes to provide an index of salmon relative abundance in a stretch of the middle Kuskokwim River using a test fishery at Aniak and a weir on the Salmon River, a tributary of the Aniak River. Since 2007, Chinook Salmon runs have been some of the lowest on record causing fishery managers to implement restrictions aimed at preventing the directed harvest of Chinook Salmon while minimizing incidental harvest during times when fishers were permitted to target Chum and Sockeye salmon for subsistence. This management strategy requires stock assessment projects that provide run timing and relative stock abundance information in-season. In-season management decisions are currently informed by a limited number of data sources. The proposed project would supplement these data sources by providing an additional index of relative salmon abundance.

Technical Review Committee: While the proposal addresses a 2020 Priority Information Need, specific details connecting it directly to fishery management for the region would have strengthened the proposal. Combining two projects into one proposal made it difficult to evaluate the merits of each project. This proposal should be split into two and include a detailed description of each project and separate budgets. A description of project methods was not provided. The proposed project is a collaboration between the Native Village of Napaimute and Alaska Department of Fish and Game. Investigators are qualified to conduct the study and the budget request is reasonable.

Project Number: 20-308
Project Title: Kwethluk River Salmon Run Timing and Abundance

Project Summary: Investigators seek four years of funding for the operation of the Kwethluk River weir. The project uses proven methodology, a resistance board weir affixed with an underwater video camera that spans a 60 meter section of the Kwethluk River approximately 88 river kilometers upstream from the confluence of the Kuskokwim River. The project monitors salmon escapement between June 20 and September 10. Sampling would follow established and technically sound methods for estimating salmon age, sex, length composition of salmon. Investigators also seek to increase the role of the Organized Village of Kwethluk to increase their capacity to operate the weir independently in the future.

Technical Review Committee: Investigators seek four years of funding for the operation of the Kwethluk River weir. Additionally, they seek to increase the role that the Organized Village of Kwethluk has in the project, thereby increasing the organization's capacity to perform such operations in the future. The project has direct linkage to the Federal public waters of the Yukon Delta National Wildlife Refuge

and fully addresses one 2020 Priority Information Need, while only marginally addressing a second. Data from the Kwethluk River weir is used to inform the run reconstruction model, which in turn is used to produce the preseason forecast for the next year. In addition, information collected from the weir is used for postseason assessment of in-season management actions, but the project has limited value for in-season management. The majority of objectives of this study are clear, measurable, and achievable, although objective five (Build local capacity to plan and operate a community-based stock assessment project and conduct community outreach) is poorly defined. Investigators should lay out duties for year one, with a timeline of increased responsibilities for the Organized Village of Kwethluk in years 2, 3, and 4 of the project. Six letters of support were submitted for this project. Local hires from Kwethluk and the surrounding villages would be hired to serve as the crew leader and fish technicians, with administrative support from the Organized Village of Kwethluk. Investigators plan to support Alaska Native Science and Engineering Program students participating in biological internships, and have identified two meaningful partnerships.

Project Number: 20-350
Project Title: Community-Based Harvest Monitoring Network for Kuskokwim River Chinook Salmon

Project Summary: This four-year interdisciplinary project proposes to implement community based harvest monitoring of catch and effort necessary for in-season estimation of Chinook Salmon subsistence harvest in the Federal waters of the Kuskokwim River. Biological data would also be collected. This project builds upon a two-year community harvest monitoring effort conducted in five communities of the lower Kuskokwim River and aligns with a harvest-monitoring project in Bethel, led by the Orutsararmiut Native Council. Investigators would directly involve residents from six villages in the collection of harvest data for integration into in-season fishery management. The interview and biological sampling protocols have been developed in consultation with and informed by Orutsararmiut Native Council, Yukon Delta National Wildlife Refuge, and Alaska Department of Fish and Game. Harvest data would be transferred from the village monitors to the data coordinator within 12 hours of the close of a fishing via a smart phone app. Biological samples and age, sex, and length information from Chinook Salmon harvests would be transferred to the data coordinator postseason. The in-season transfer of data via cell phone app was tested during the previous two-year project.

Technical Review Committee: This project addresses four regional Priority Information Needs, has Federal nexus through the Yukon Delta National Wildlife Refuge, and involves a subsistence resource of primary importance to Kuskokwim River communities, Chinook Salmon. Technical and scientific merit are conditional upon collaboration with others; this is not a stand-alone project, but one component of an in-season harvest assessment program that has a high price tag for data collection only. Investigators have experience conducting and completing similar projects with success. The project proposes to hire and train nine village monitors who would be considerably compensated for their time. There are no representatives from any rural, Alaska Native, or tribal organizations that are serving as co-investigators, however many are participating on the project as partners or consultants. Four letters of support were submitted with this proposal.

Project Number: 20-351
Project Title: Food Knowledge and Place Name Documentation on the Kuskokwim River: Continuity and Change

Project Summary: This project seeks to document traditional ecological knowledge relating to use of food resources generally and salmon in particular by residents of the central Kuskokwim River area. Methodologies include topic-based meetings on local, sub-regional, and regional levels, as well as a multidisciplinary survey of the central Kuskokwim River with elders. These meetings would cover the following topics: salmon preparation, preservation, and storage, food sharing within and beyond villages (including customary trade), and starvation strategies. The latter seeks to apply historical experience to new forms of anthropogenic scarcity, an innovative strategy that would address the need to apply traditional ecological knowledge as part of an adaptive strategy for dealing with environmental change.

Technical Review Committee: This project seeks to document traditional ecological knowledge related to use of food resources generally and salmon in particular in the central Kuskokwim River area. Dr. Fienup-Riordan is a respected investigator in her field. Methodologies include topic-based meetings on local, sub-regional, and regional levels, as well as a multi-disciplinary survey of the central Kuskokwim River with elders and collaborating scientists. Four 2020 Priority Information Needs fall within the very broad scope of the project. Investigators would use methods for knowledge production that include placing subsistence users and scientists in the field simultaneously to discuss, generate, and document knowledge about interrelated natural, historical, social, and biological systems. The emphasis is on immediate concerns about preserving knowledge that would be lost with the passing of elders, rather than urgency of its application in a limited management problem-solving context; relevance to the Monitoring Program would have been strengthened by a narrower focus on salmon in the context of management applications. This is a large, intricate project with many moving parts, and an equally elaborate budget.

Project Number: 20-352
Project Title: Improving Communication and Sharing of Information Among Subsistence Salmon Fishers, Stakeholder Groups, and Management Agencies in the Kuskokwim River Drainage

Project Summary: This three-year project proposes to address the need for information sharing between subsistence salmon fishers and management agencies regarding salmon conservation in the Kuskokwim River drainage. Investigators state that weekly management meetings held in Bethel leave many fishers from smaller communities feeling uniformed and left out of the decision making process. The project has two goals. Investigators propose a series of public meetings and in-person contacts in eight communities along the Kuskokwim River. The principal investigator would work with participating communities to first identify issues of significance to the communities and then to address those issues through educational modules that provide communication and listening opportunities and result in the development of effective tools for subsistence information outreach campaigns.

Technical Review Committee: This project directly addresses one Priority Information Need, and Federal nexus is provided through the Yukon Delta National Wildlife Refuge. Both investigators have

substantial resources available to them through the Alaska Department of Fish and Game, and both investigators have good track records of leading and completing other Monitoring Program projects. The technical and scientific merit of the project is challenging. The investigation plan does not clearly indicate the proven utility of the chosen methodologies to achieve technical or demonstrable results and without further discussion they were hard to assess. Much in-season work is attributed to local research assistants but compensation in the budget detail is not adequate for the effort described. Otherwise, the total project budget is reasonable for the work proposed. Consultations with local tribal organizations would occur and permissions would be obtained. Eight local research assistants would be hired. No letters of support were submitted with application materials.

Project Number: 20-353
Project Title: Subsistence Harvest Use, and Local and Traditional Knowledge of Whitefishes in the Middle Kuskokwim River

Project Summary: This three-year project proposes to collect local and traditional knowledge related to whitefishes and to assess the harvest and use of whitefishes by residents of the middle Kuskokwim River communities of Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, Crooked Creek, Red Devil, Sleetmute, and Stony River. The primary methods used would include participant observation, key respondent interviews, and harvest surveys. Investigators would survey all households in seven communities, and conduct a 60% random sample survey in the larger community of Aniak for a project total of 339 households.

Technical Review Committee: The project would compare the harvest and use of whitefishes in 2020 with the harvest and use of whitefishes documented by previous studies and augment the results with local traditional knowledge of whitefishes and whitefish ecology. The project objectives could be more streamlined but are measureable and achievable. The methods include participant observation, key respondent interviews, and harvest surveys. All are proven means of ethnographic quantitative and qualitative research. The investigation plan, schedule, budget, and budget narrative do not align in describing the two years of survey administration and the two years of key respondent interviews. The investigation plan describes data collection and reduction processes for the surveys, and a particularly robust 63 key respondent interviews. While participant observation is the first method described in the project design, investigators do not describe how this methodology would be addressed and incorporated into the report. Investigators have experience, local expertise, and resources to complete the work proposed. There are no partnerships or collaborations proposed for this project. Capacity building is addressed through the hire and training of seven local research assistants in consultation with local tribal and village organizations. The cost is reasonable but perhaps under budget for the work proposed, especially considering extensive time and travel in eight rural Alaskan communities, and two years of field work. No letters of support were submitted with this project.

SOUTHWEST ALASKA REGION

Priority Information Needs

The 2020 Notice of Funding Opportunity for the Southwest Alaska Region identified the following seven priority information needs:

- Reliable estimates of the harvest and use of fish used for subsistence. Of particular interest are harvest trends in the communities of Kodiak, Manokotak, Nondalton, Ouzinkie, Port Alsworth, and Port Lions.
- Local observations of change in fish populations (quality, run timing, sex ratios, age composition, etc.) in the Southwest Alaska Region, and associated effects on subsistence uses.
- 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.
- 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, and Kodiak Archipelago stocks.
- Annual estimates of Sockeye Salmon escapement in the Lake Clark watershed.
- Reliable estimates of Chinook Salmon escapement and evaluation of "quality of escapement" measures (for example, potential egg deposition, sex and size composition of spawners, spawning habitat quality and utilization) for determining the reproductive potential of spawning stocks in Big Creek, Naknek River, Alagnak River, Meshik River, and Togiak River.
- 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.

Proposals Submitted for the Southwest Alaska Region

Two proposals were submitted for funding in the Southwest Alaska Region. They are listed in numerical order in **Table 4**, below.

In addition to the proposed projects, the following three projects are currently being funded by the Monitoring Program in the Southwest Alaska Region:

- 18-400 Buskin River Sockeye Salmon Stock Assessment and Monitoring
- 18-450 Unalaska Fish Harvest Practices
- 18-451 Subsistence Harvest Trends for Fish in Four Southern Kodiak Island Communities

Table 4. Projects submitted for the Southwest Alaska Region, 2020 Monitoring Program, including total funds requested and average annual funding requests.

Project Number	Title	Total Project Request	Average Annual Request
20-400	McLees Lake Sockeye Escapement	$ 220,559	$ 55,140
20-450	Kodiak Road System Subsistence Fisheries Harvest Assessment	$366,230	$122,077
Total		$586,789	$177,217

Regional Advisory Council Comments

Kodiak Aleutians Subsistence Regional Advisory Council

The Council spoke in favor of both projects (20-400 McLees Weir and 20-450 Kodiak Road System Subsistence Surveys) but did not have any comments regarding specific concerns or ideas for improving the likelihood of project successes.

Several Council members asked about the current process for project selection. The Council wanted a better understanding of the logic used by the Technical Review Committee to score proposed projects. Council members felt the process put too much emphasis on technical criteria and not enough emphasis on community needs. Council members also had concerns that the Technical Review Committee process carried more weight in the selection process than the problem definition by the Council (through Priority Information Needs). Council members felt unsure of where decision points were. This made it unclear if the process worked to meet the needs of communities and/or supported Council recommendations. Council members wanted applicants to have an opportunity to submit proposals before the Technical Review Committee review process, similar to the previous pre-proposal process.

Bristol Bay Alaska Subsistence Regional Advisory Council

The Council supported both projects (20-400 McLees Weir and 20-450 Kodiak Road System Subsistence Surveys) and expressed support for projects that included hiring local residents. The Council noted neither project would occur in the Bristol Bay Region and encouraged local investigators to submit funding proposals investigating Bristol Bay fisheries. In regards to the Monitoring Program process, Council members wanted a Native representative on the Technical Review Committee.

Interagency Staff Committee Comments

The Interagency Staff Committee supports the Technical Review Committee's assessment of the 2020 Southwest Alaska Region proposals. Both projects appear to have strong local hire components, as noted by the Bristol Bay Subsistence Regional Advisory Council. Project 20-450 appears to have synergistic

potential, given the recent Partners for Fisheries Monitoring Program award made to the Qawalangin Tribe.

Technical Review Committee

The Technical Review Committee evaluated and scored each proposal on Strategic Priority, Technical and Scientific Merit, Investigator Ability and Resources, Partnership and Capacity Building, and Cost/Benefit. The Technical Review Committee's abbreviated reviews are provided below.

Project Number: 20-400
Project Title: Estimation of Sockeye Salmon Escapement into McLees Lake, Unalaska Island

Project Summary: Investigators intend to enumerate the McLees Lake Sockeye Salmon run, describe run timing, estimate weekly sex and age compositions of the run, estimate mean length by sex and age of the run, and estimate production thresholds of McLees Lake for rearing juvenile Sockeye Salmon. Investigators would construct a rigid picket weir at the outlet of McLees Lake. The weir would be operated from approximately June 1 to August 1 during each year of this four-year project. A trap and holding area would be installed on the upstream side of the weir to facilitate sampling fish and passing adult salmon through the weir. Sampling would consist of identifying species, measuring length, determining sex, collecting scales, and then releasing the fish upstream of the weir. All scales collected would be read to determine age. Limnological and zooplankton sampling would be conducted and further analyzed by the Alaska Department of Fish and Game Kodiak Island Limnology Lab.

Technical Review Committee: This proposal is to operate the weir at the outlet of McLees Lake on Unalaska Island for the 2020, 2021, 2022, and 2023 seasons. McLees Lake is located within the Alaska Maritime National Wildlife Refuge, and Sockeye Salmon from this stock make up a large component (60–90%) of the annual Sockeye Salmon harvest by rural residents of Unalaska Village. The project directly addresses a Priority Information Need for the Southwest Alaska Region and has direct management implications for subsistence harvests of Sockeye Salmon. Each of the five objectives of the project are clear, measurable, and achievable and use proven science and logistics that have been in place for years. The Alaska Department of Fish and Game is the lead on this project and is partnering with the Qawalangin Tribe of Unalaska. The Alaska Department of Fish and Game would seek recommendations and consultation from the Qawalangin Tribe for hiring technicians with an emphasis on local hires. The Alaska Department of Fish and Game project and crew leaders would act as mentors to the technicians. The Qawalangin Tribe was recently awarded a Partners for Fisheries Monitoring Program award that they plan to use to hire a fisheries biologist and a technician to work on this project, if it is funded. The Partners Program funded biologist position would strengthen the Tribe's ability to participate in the assessment of the McLees Lake subsistence fishery. It would reinforce trust and partnership with the community of Unalaska and other stakeholders through consultation and the exchange of information. The cost to the Monitoring Program for the project is reasonable for the work being proposed.

Project Number: 20-450
Project Title: Kodiak Road System Subsistence Fisheries Harvest Assessment

Project Summary: This three-year project proposes to update community harvest data for salmon and nonsalmon fish species through the administration of harvest surveys, resource mapping, and key respondent interviews. This project would provide a comprehensive view of subsistence fish harvesting and changes in accessibility, abundance, and use of fish, and sharing of subsistence resources among residents of the Kodiak Road System.

Technical Review Committee: A Federal nexus is provided by Federal public waters in Womens Bay and surrounding Afognak Island. The proposed research addresses two 2020 Priority Information Needs. Investigators intend to build upon recently conducted and on-going projects funded by the Monitoring Program or other similar efforts. The investigation plan is well written and project objectives are clear, measurable, and achievable. Research methods are standard for the Division of Subsistence of the Alaska Department of Fish and Game, with recognized results; the cost of the project is high but reasonable for the work proposed; and the timeline is realistic, giving ample opportunity for investigators to address each stage of research. The budget and investigator capacity is strong. The Sun'aq Tribe of Kodiak is a co-investigator and would participate in survey development and review, explore education and outreach opportunities, and participate in the drafting and review of the final report, among other responsibilities. The project proposes to hire six local research assistants, one Sun'aq Tribe of Kodiak intern, and one graduate student intern with Alaska Department of Fish and Game. There are four letters of support from local organizations, tribes, and agencies.

SOUTHCENTRAL ALASKA REGION

Priority Information Needs

The 2020 Notice of Funding Opportunity for the Southcentral Alaska Region identified the following four priority information needs:

- Abundance, run timing, spawning site fidelity and timing, and age, sex, and length composition for Chinook Salmon that stage or spawn in waters of the Kasilof River and its tributaries under Federal subsistence fishery jurisdiction.

- Obtain reliable estimates of Chinook, Coho, and Sockeye Salmon escapement into the Copper River drainage and Copper River delta systems (for example, projects utilizing weir, sonar, and/or mark-recapture methods).

- Develop, test, and implement methodologies for monitoring salmon spawning escapement in the Copper River drainage.

- Implement the collection of real-time harvest data of salmon in the Copper River drainage.

Proposals Submitted for the Southcentral Alaska Region

Three proposals were submitted for funding in the Southcentral Alaska Region. They are listed in numerical order in **Table 5**, below.

Table 5. Proposals submitted for the Southcentral Alaska Region, 2020 Monitoring Program, including total funds requested and average annual funding requests.

Project Number	Title	Total Project Request	Average Annual Request
20-501	Klutina River Sonar Pilot Project	$516,636	$129,159
20-502	Abundance and run Timing of Salmon in Tanada Creek	$296,200	$ 74,050
20-503	Environmental Monitoring Methodologies for Upper Copper River Sockeye and Chinook Salmon	$389,410	$97,353
Total		$1,202,246	$300,562

In addition to the above proposed projects, the following two projects are currently being funded by the Monitoring Program in the Southcentral Alaska Region.

- 18-501 Gulkana River Sockeye Salmon Harvest Contribution
- 18-504 Estimating the Inriver Abundance of Copper River Chinook Salmon

Regional Advisory Council Comments

Southcentral Alaska Subsistence Regional Advisory Council

The Council noted the importance of monitoring Sockeye and Chinook salmon stocks in the Copper River as proposed in Project 20-501 (Klutina Sonar), given situations like this year when hatchery returns to the system were substantially lower than anticipated. Council members noted these types of projects that would monitor individual systems and stocks were needed, and investigating these systems and stocks was becoming less expensive due to new, more efficient methods.

The Council supported Project 20-502 (Tanada Creek Weir), noting that data from this long-term project has been used in the past during Alaska Board of Fisheries meetings. Council members noted concerns about ending long-term projects. Council members also identified several Priority Information Needs met and local jobs provided by the project. Additionally, Council members spoke of this being the earliest wild stock run returning to the drainage each year.

The Council raised concerns about Project 20-503 (Environmental Monitoring Methodologies for Upper Copper River Sockeye and Chinook Salmon) because it would incorporate limited community involvement, contained an unclear scope of work, and would not provide jobs for rural residents. Several Council members noted the Priority Information Need identified with this project was for promoting fish passage, while this project was directed towards environmental monitoring. One Council member noted that environmental monitoring was needed as well, but was not something identified as a Priority Information Need this cycle. The Council indicated that a project of this type would need to collect more than four years of information to provide the type of data necessary for decision making.

Interagency Staff Committee Comments

The Interagency Staff Committee supports the Technical Review Committee's assessment of the 2020 Southcentral Alaska Region proposals. We concur with Southcentral Alaska Subsistence Regional Advisory Council's comments regarding the three proposals in their region. At their fall 2019 Meeting, the Southcentral Alaska Subsistence Regional Advisory Council supported funding for Proposals 20-502 and 20-501 because they addressed priority information needs and helped build capacity. The Council voiced concern with Proposal 20-503, which is noted in their comments section.

Technical Review Committee

The Technical Review Committee evaluated and scored each proposal on Strategic Priority, Technical and Scientific Merit, Investigator Ability and Resources, Partnership and Capacity Building, and Cost/Benefit. The Technical Review Committee's abbreviated reviews are provided below.

Project Number: 20-501
Project Title: Klutina River Sonar Pilot Project

Project Summary: This is a proposal for a new project to monitor returns of Chinook and Sockeye salmon to the Klutina River, a tributary of the Copper River. The Klutina River is upstream of the

Chitina Subdistrict and within the Glennallen Subdistrict, and has been shown through past radio-telemetry studies to be a major contributor to the overall Copper River returns of both species. The project proposes to use two sonar units to document run size and run timing for both species. The goal of the project is to determine the feasibility of using multi-beam sonar as a long-term and cost-effective tool for monitoring tributary salmon escapement within the Copper River Watershed. The project would be a new partnership between the Native Village of Eyak and the Ahtna Intertribal Resource Commission.

Technical Review Committee: The goal of the project is to determine the feasibility of using multi-beam sonar as a long-term and cost-effective tool for monitoring tributary salmon escapement within the Copper River Watershed. The project would be a new partnership between the Native Village of Eyak and the Ahtna Intertribal Resource Commission. The project directly addresses the Priority Information Need: develop, test, and implement methodologies for monitoring salmon spawning escapement in the Copper River drainage, and partially addresses: obtain reliable estimates of Chinook, Coho, and Sockeye Salmon escapement into the Copper River drainage. Investigators have outlined a clear sampling design, which has been improved through consultations with Alaska Department of Fish and Game staff from Cordova and Fairbanks and staff from Wrangell-St. Elias National Park and Preserve. The proposal would be improved by including a proven assessment of a location suitable for this methodology, an apportionment design, and a more thorough discussion of the usefulness of this data to inform management of subsistence resources. Investigators have the resources necessary to carry out the project, and specific divisions of duties and responsibilities are clearly articulated in the proposal. The proposal outlines a mentoring relationship between the two groups, whereby the Ahtna Intertribal Resource Commission has the opportunity to learn from a mature fisheries research program how to develop and implement a successful research project. The proponents note that this project would provide both entities with a meaningful role in the research and management of the local salmon resource, and would also promote and strengthen collaborative partnerships with the State and Federal management agencies, and the tribes. Nine letters of support were submitted with the proposal.

Project Number: 20-502
Project Title: Abundance and Run Timing of Salmon in Tanada Creek

Project Summary: The investigator requests funds to operate a resistance board weir at Tanada Creek to estimate Sockeye and Chinook salmon escapement from mid-June through mid-September. In addition, otolith age data would be collected and video technology would be used at the weir to ensure 24-hour escapement enumeration. This weir was previously funded through the Monitoring Program from 2000 to 2017. In 2007, video equipment was integrated into the weir to ensure that all salmon passing the site would be recorded. This change also allowed salmon to migrate past the weir at all times rather than only when crew was on site.

Technical Review Committee: This weir has been funded through the Monitoring Program since its inception in 2000 (Projects 00-013, 04-502, 07-502, 10-502, and 14-503). The project monitors Sockeye and Chinook salmon stocks within the upper Copper River watershed, and addresses a Priority Information Need for the region. It is within the Wrangell-St. Elias National Park and Preserve, upstream of the Federal subsistence fisheries in the Glennallen Subdistrict of the Upper Copper River District, and

downstream of the Batzulnetas Area fishery. Though escapement of Sockeye Salmon into Tanada Creek make up a small portion (0.5% to 5.4%) of the total returns to the Copper River drainage as measured at the Miles Lake Sonar, it does represent one of the largest spawning stocks in the upper Copper River drainage. Weir counts from this location are one of the tools used to assess how well the State manages the portion of the run that passes the Miles Lake sonar site early in the season as part of their post-season review. All of the components of the project are already in place, the principal investigator is more than qualified to run this project, and the weir was updated to video technology in 2007. The cost of the proposed project is reasonable and the agency match is greater than the amount requested from the Monitoring Program. The project would likely hire local individuals.

Project Number: 20-503
Project Title: Environmental Monitoring Methodologies for Upper Copper River Sockeye and Chinook Salmon

Project Summary: This new project proposes to create datasets for monitoring salmon habitat indices through a multi-phased, interdisciplinary approach to address existing gaps in baseline knowledge concerning salmon spawning escapement and related spawning habitats. The project includes co-investigators from two other organizations and has multiple partnerships. Investigators plan to use traditional ecological knowledge and existing fisheries datasets to identify and establish monitoring stations at three to five sites important to spawning Chinook Salmon and/or Sockeye Salmon. Monitoring stations would provide information that would characterize ground and surface water interactions taking place over a range of hydrologic/habitat conditions that influence the early stages of salmon life history. Local tribal and community entities would development a strategic plan for long-term monitoring with a focus on changes to spawning habitat quality.

Technical Review Committee: This new project, led by the Subsistence Division of the Alaska Department of Fish and Game, proposes to use traditional ecological knowledge and existing fisheries datasets to identify and establish monitoring stations at three to five sites important to spawning Chinook Salmon and/or Sockeye Salmon. Research in the form of focus groups, key respondent interviews, participatory observation, and traditional ecological knowledge mapping would be conducted within the communities of Mentasta, Chistochina, and Slana, and would focus on resources and monitoring sites in the Upper Copper River. The proposal minimally addresses a 2020 Priority Information Need, but does address two of the goals of the Southcentral Alaska Strategic Plan. It is unclear whether the proposed habitat monitoring would provide managers with information directly relevant to subsistence management. The proposal contains four specific objectives that are clear, measurable, and achievable within the scope of the project timeline. This could be the start of an extended monitoring program that would clearly be an asset to this region in a time of changing environmental conditions; however, this type of program would likely require additional funding for long-term monitoring, additional sites, and data analysis/modeling that are not addressed in the proposal. The principal investigator is in the Division of Subsistence, and is in partnership with co-investigators in the Division of Sport Fish and The Scholar Ship. Additional project collaboration and partnerships are with the State of Alaska's Salmon and People Project and Ecotrust. Investigators would engage local youth and residents with data acquisition, and

involve local tribal and community entities with the development and implantation of a strategic plan for long-term monitoring. Six letters of support were submitted for this project.

SOUTHEAST ALASKA REGION

Priority Information Needs

The 2020 Notice of Funding Opportunity for the Southeast Alaska Region identified the following six priority information needs:

- Reliable estimates of Sockeye Salmon escapement and in-season estimates of harvest at the following systems: Kanalku, Klawock, Hetta, Falls Lake, Sarkar, Kook, Neva, Karta, Hatchery, Eek, Kah Sheets, Klag, Gut, Kutlaku, Salmon Bay, Sitkoh, Hoktaheen, Alecks Creek, and Lake Leo.
- Escapement indexes for Eulachon at the Unuk River and Yakutat Forelands.
- Population assessment for Eulachon for northern Southeast Alaska.
- Traditional ecological knowledge of how each community distributes harvest between Sockeye Salmon systems available to them.
- Reliable estimates of salmon populations and harvests in the sport and subsistence fisheries at Kah Sheets and Alecks Creek.
- Ethnographic study of the Yakutat subsistence salmon fishery.

Proposals Submitted for the Southeast Alaska Region

Three proposals were submitted for funding in the Southeast Alaska Region. They are listed in numerical order in **Table 6**, below.

Table 6. Projects submitted for the Southeast Alaska Region 2020 Monitoring Program, including total funds requested and average annual funding requests.

Project Number	Title	Total Project Request	Average Annual Request
20-600	Eek Lake and Kasook Lake Subsistence Sockeye Salmon Stock Assessment Project	$364,202	$91,051
20-601	District 1 Eulachon Population Assessment	$218,996	$54,749
20-603	Northern Southeast Alaska Eulachon Population Dynamics Monitoring	$658,034	$164,509
Total		$1,241,232	$310,309

In addition to the above proposed projects, the following six projects are currently being funded by the Monitoring Program in the Southeast Alaska Region.

- 18-602 Falls Lake Subsistence Sockeye Salmon Stock and Harvest Assessment
- 18-603 Gut Bay Subsistence Sockeye Salmon Stock and Harvest Assessment
- 18-604 Hetta Lake Subsistence Sockeye Salmon Stock Assessment Project
- 18-607 Neva Lake Sockeye Salmon Stock Assessment
- 18-609 Sitkoh Lake Sockeye Salmon Stock Assessment
- 18-610 Klag Lake Sockeye Salmon Stock Assessment

Regional Advisory Council Comments

Southeast Alaska Subsistence Regional Advisory Council

The Council spoke favorably about Projects 20-600 (Eek Lake and Kasook Lake Sockeye Salmon Assessments), 20-601 (District 1 Eulachon Monitoring), and 20-603 (Northern Southeast Region Eulachon Monitoring) and asked to see all three projects funded. One Council member noted both Eulachon projects addressed Priority Information Needs and both had capacity building components. The Council discussed monitoring Sockeye Salmon at Eek and Kasook lakes, noting that although these sites were near Hetta Lake, which has been continuously monitored for 20 years, both of these systems have been in severe decline. The Council noted people often fished in these systems while in transit to other fishing sites such as Hetta Lake. Council members also cited the importance of Eulachon as a forage fish and the need to monitor their populations across the region, including near the Neva Creek system.

In addition, Council members had questions regarding the Monitoring Program process, funding for projects in the Sarkar system and the Yakutat area, 2018-cycle projects that were currently in progress, and how long a project could or should be funded. The Council requested to know how much non-Federal match or in-kind funding had been provided in past projects, if possible.

Interagency Staff Committee Comments

The Interagency Staff Committee supports the Technical Review Committee's assessment of the 2020 Southeast Alaska Region proposals. We noted that there are currently six ongoing Monitoring Program projects in the Southeast Alaska Region so care should be taken not to overcommit out-year funding. Proposal 20-603 project funds will be used to address eulachon monitoring, which is an ongoing priority information need throughout Southeast Alaska. Similar to what occurred in 2019, Forest Service staff stated at the fall Southeast Alaska Subsistence Regional Advisory Council meeting that the Forest Service is committed to working with local stakeholders to address Unuk River Eulachon monitoring in 2020.

Technical Review Committee

The Technical Review Committee evaluated and scored each proposal on Strategic Priority, Technical and Scientific Merit, Investigator Ability and Resources, Partnership and Capacity Building, and Cost/Benefit. The Technical Review Committee's abbreviated reviews are provided below.

Project Number: 20-600
Project Title: Eek Lake and Kasook Lake Subsistence Sockeye Salmon Stock Assessment Project

Project Summary: Investigators propose to continue monitoring Sockeye Salmon escapement at Eek Lake, which has been funded through the Monitoring Program since 2015. The objectives are to estimate Sockeye Salmon escapement, and estimate age, sex, and length composition. Investigators also propose to begin a Sockeye Salmon stock assessment at Kasook Lake, where little population information exists. The objectives at Kasook Lake are to index, or possibly estimate, Sockeye Salmon escapement, and estimate age, sex and length composition. Harvest information on these stocks would continue to be collected through the community harvest monitoring program for Hetta Lake.

Technical Review Committee: The investigator is the environmental planner for the Hydaburg Cooperative Association. He proposes to lead a Sockeye Salmon stock status and trends project at Eek and Kasook lakes. The Eek Lake portion of this project addresses a 2020 Priority Information Need in the 2020 Notice of Funding Opportunity while the Kasook Lake portion does not. Sockeye Salmon stock status information from both systems would be useful for fisheries management. The study plans for this project are similar to the Hetta Lake project (18-604) and other Sockeye Salmon Monitoring Program projects in Southeast Alaska. The objectives are clear, measurable, and mostly achievable. However, there are a few concerns with the methods that may be addressed by input from State and Federal biologists through an informal commitment of assistance. The principal investigator is responsible for overseeing the entire project with technical assistance from co-investigator Ms. Cathy Needham, and State and Federal biologists. The cost of the project is reasonable and about average, considering there is no harvest monitoring component and no weir or crew on site at Kasook Lake.

Project Number: 20-601
Project Title: District 1 Euchalon Population Assessment

Project Summary: The primary objective of the project is to document the biomass and spawning locations of Eulachon in District 1, with primary effort focused on the Unuk River area. Investigators would use ground and aerial surveys to document and estimate the spawning biomass of Eulachon, collect samples for age and length information, and estimate harvest. On-the-ground surveys would concentrate on spawning areas within the Unuk River area, while aerial surveys would be conducted in other areas within District 1.

Technical Review Committee: This project would allow Federal in-season managers and fisheries biologists to continue monitoring the status of the Behm Canal Eulachon population, which has traditionally been an important subsistence resource. The Eulachon population has been closed to fishing since 2006 because of critically low levels, which led the Southeast Subsistence Regional Advisory Council to identify the development of escapement indices for Unuk Eulachon to be a priority information need. While the methods proposed would not provide a precise population estimate, they should be sufficient for monitoring trends in Eulachon abundance. In the past, the timing of surveys has been a challenge because of inclement spring weather. Maintaining a survey crew in the field throughout the Eulachon spawning season should improve the chances of gathering useful information. The investigators have experience conducting Monitoring Plan projects, including the previous Eulachon

monitoring efforts. The cost of the project is reasonable, though the budget may underestimate the cost of conducting aerial surveys.

Project Number: 20-603
Project Title: Northern Southeast Alaska Eulachon Population Dynamics Monitoring

Project Summary: The overall goal of this project is to develop a monitoring strategy for Eulachon populations in northern Southeast Alaska, and to integrate local tribal and community organizations into the management of those populations. The spawning biomass of Eulachon would be assessed using both mark-recapture methods and quantitative eDNA in the Chilkoot River, and eDNA at nine other locations in the Lynn Canal area. The resulting information would be reported at conferences and used to develop a multi-agency monitoring strategy for Eulachon throughout the upper Lynn Canal/northern Southeast Alaska region.

Technical Review Committee: The Southeast Subsistence Regional Advisory Council identified that a population assessment for Eulachon for northern Southeast Alaska is a priority information need. The spawning biomass of Eulachon would be assessed using both mark-recapture methods and quantitative environmental DNA (eDNA) in the Chilkoot River, and eDNA alone at nine other locations in the Lynn Canal area. The use of quantitative eDNA to assess fish abundance is an emerging science, but the project partners have been using it for several years with encouraging results. The plan would be improved by addition of a mechanism to calibrate the eDNA results at the other sites. The project partners include a number of non-profit and tribal agencies, and the development of capacity in those agencies is a goal of the project. The expenses for the project are reasonable and well-planned, but the overall cost is high due to its ambitious scope. If the use of eDNA proves to be an effective way to monitor Eulachon populations, it would be an important advancement that could be used at other locations, and greatly improve the cost effectiveness of future monitoring efforts.

Draft Funding Recommendations for 2020 Fisheries Resource Monitoring Plan

Based upon Technical Review Committee rankings
and Regional Advisory Council and Interagency Staff Committee comments.

Proposal Number	Project Name	Organization	Total	Average Annual Cost	Running Total
20-100	BLBNP Genetic Stock Determination	NPS/ADFG	$316,800	$79,000	$79,000
20-101	Noatak River Dolly Varden	ADFG/USFWS	$246,177	$82,059	$161,059
20-150	Dolly Varden/Whitefish TEK	ADFG	$172,684	$86,342	$247,401
20-200	Yukon River Coho Telemetry	ADFG, USFWS	$456,219	$152,073	$399,474
20-201	Yukon River Chum Salmon	USFWS	$518,128	$129,532	$529,006
20-202	Arctic Lamprey	USFWS, ADFG	$33,836	$16,918	$545,924
20-204	Henshaw Creek Weir	Tanana Chiefs Conf.	$733,256	$183,314	$729,238
20-251	Yukon River Subsistence Salmon Survey	Yukon River Drainage Fisheries Assoc./USFWS	$320,076	$80,189	$809,427
20-252	Lower/Middle Yukon River Customary Trade	ADFG	$310,487	$103,496	$912,923
20-256	Yukon River In-Season Salmon Management Teleconferences	Yukon River Drainage Fisheries Assoc.	$78,854	$19,713	$932,636
20-301	Kuskokwim River Coho/Whitefish Sonar	ADFG	$417,750	$104,437	$1,037,073
20-302	Pitka Fork Weir	ADFG	$423,257	$105,814	$1,142,887
20-303	Kukokwim River Salmon Assessment	Native Village of Napaimute	$368,988	$92,247	$1,235,134
20-308	Kwethluk River Weir	USFWS	$726,333	$181,583	$1,416,718
20-351	Kuskokwim River Food Knowledge and Place Names	Calista Education and Culture	$400,000	$100,000	$1,516,718
20-400	McLees Lake Sockeye Escapement	ADFG	$220,559	$55,140	$1,571,857
20-450	Kodiak Road System Subsistence Salmon/Nonsalmon	ADFG	$366,230	$122,077	$1,693,934
20-501	Klutina River Sonar	Native Village of Eyak/ AHTNA	$516,636	$129,159	$1,823,093
20-502	Tanada Creek Weir	NPS	$296,200	$74,050	$1,897,143
20-600	Eek and Kasook Lakes Sockeye Escapement	Hydaburg Cooperative Ass.	$364,202	$91,051	$1,988,194
20-603	Southeast Eulachon Populations Dynamics Monitoring	Chilkoot Indian Assoc.	$658,034	$164,509	$2,152,702

Region	Average Annual Cost by Region	DOI Funds	%	Guide-line %	USDA Funds	%	Guide-line %	Harvest Monitoring/ Traditional Ecological Knowledge	Stock Status and Trends	Federal Agency	State Agency	Tribal or Rural Organ-ization	Other Organ-ization
Northern	$247,401	$247,401	13%	17%				$86,342	$161,059	$79,000	$168,401		
Yukon	$685,235	$685,235	37%	29%				$203,398	$481,837	$146,450	$255,569	$183,314	$99,902
Kuskokwim	$584,082	$584,082	31%	29%				$100,000	$484,082	$181,583	$210,251	$92,247	$100,000
Southwest	$177,216	$177,216	9%	15%				$74,050	$103,166		$177,216		
Southcentral	$203,209	$181,558	10%	5%	$21,651	8%	32.5%		$203,209	$74,050		$129,159	
Southeast	$255,559				$255,559	92%	62.5%		$255,559			$255,559	
Multi-Region				5%			5%						
Total	$2,152,702	$1,875,492			$277,210			$463,790	$1,688,912	$481,083	$811,438	$660,279	$199,902
		87%			13%			22%	78%	22%	38%	31%	9%

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THRESHOLD ANALYSIS
REQUEST FOR RECONSIDERATION RFR18-01

ISSUE

In response to Wildlife Proposal WP18-01, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), the Federal Subsistence Board (Board) reduced the deer harvest limit for non-Federally qualified users hunting under State of Alaska hunting regulations on Federal public lands in Unit 2 from four male deer to 2 male deer. The proposal also asked for a reduction in the State managed deer hunting season in Unit 2, but that portion of the proposal was not supported by the Council or the Board.

The Council submitted this proposal after public testimony during their winter 2017 meeting in Craig, where Federally qualified subsistence users testified that they had a harder time harvesting deer in Unit 2 during the 2016 season. In supporting its proposal, the Council felt that subsistence needs were not being met and a reduction in the harvest limit for non-federally qualified users would provide a rural resident priority. The Council also believed that non-Federally qualified users would not be adversely affected since they average 2 deer per hunter and a reduction from 4 to 2 male deer would not make a huge difference in their overall harvest. The Council voiced concerns that if the Alaska Department of Fish and Game (ADF&G) harvest objective continued to be exceeded, there could be an imminent conservation shortage if the Council did not take pre-emptive action to provide for a rural subsistence preference (SERAC 2017).

Subsequently, the Board received six requests for reconsideration (RFR or petition) from the following (Appendix 1):

- The State of Alaska, letter dated May 11, 2018
- Matt Allen, resident of Ketchikan, AK, email April, 2018
- Chas Edwardson, resident of Ketchikan, AK, email April 27, 2018
- Jeff Hendrickson, resident of Ketchikan, AK, email May 1, 2018
- Andy Mathews, resident of Ketchikan, AK, email April 23, 2018
- William Meck, resident of Ketchikan, AK, email April 23, 2018

The Federal subsistence regulations in 36 CFR 242.20(d) and 50 CFR 100.20(d) outline the guidelines for submitting a request that the Board reconsider regulatory decisions (Appendix 2). The Board will accept a request for reconsideration only if the request meets one or more of the following criteria:

1. Provides information not previously considered by the Board
2. Demonstrates that existing information used by the Board is incorrect
3. Demonstrates that the Board's interpretation of information, applicable law, or regulation is in error or contrary to existing law

EXISTING REGULATIONS

Federal Regulations

Unit 2 - Deer

5 deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct. 15–Jan. 31. Harvest ticket number five must be used when recording the harvest of a female deer, but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.	*July 24 – Jan. 31*
Federal public lands on Prince of Wales Island, excluding the southeastern portion (lands south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 to Aug. 15, except by Federally qualified subsistence users hunting under these regulations. ***Non-Federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.***	

State Regulation

Unit 2 – Deer

Residents and non-residents: Four bucks	*Aug. 1 – Dec. 31*
Harvest tickets must be validated in sequential order, and unused tickets must be carried when you hunt.	

BACKGROUND

Following years of numerous Unit 2 related deer proposals (>30) submitted to the Board, the Unit 2 Deer Planning Subcommittee (Subcommittee) was formed in 2004 to address contentious deer management issues in Unit 2. At the request of the Board, the Council established the 12-member Subcommittee to address concerns that Federally qualified subsistence users in Unit 2 were unable to harvest enough deer to meet their needs. The Subcommittee included residents of Craig, Hydaburg, Ketchikan, Petersburg, Point Baker and Wrangell, to reflect the range of users of Unit 2 deer, along with representatives from State and Federal wildlife management agencies.

The Subcommittee developed management recommendations at a series of five public meetings. Both Federally and non-Federally qualified users participated at these meetings. The Southeast Regional Advisory Council accepted the recommendations of the Subcommittee that deer harvest management tools be applied in Unit 2 as deer population trends and hunting use patterns change. The degree to which

these tools would be employed would be decided through the established public regulatory processes (SERAC 2006).

In 2006, the Board implemented two major changes regarding the Unit 2 deer hunt by adopting Proposals WP06-08 and WP06-09 with modification. Adoption of WP06-08, as modified, reopened a portion of Federal public lands to non-Federally qualified users on the southeast side of Prince of Wales Island. Adoption of WP06-09, as modified, established the current 5 deer harvest limit for Federally qualified subsistence users (FSB 2006). Two other proposals, WP06-06 and WP06-10, related to the use of harvest tickets in Unit 2 were unanimously opposed by the Council and rejected by the Board (FSB 2006). Three proposals related to Unit 2 deer were submitted from 2007-2012. Proposal WP07-07 requested the female deer season be closed, Proposal WP10-19 requested a change to the female deer season length and Proposal WP10-20 requested the August closure to non-Federally qualified users be lifted. The Council opposed and the Board rejected these proposals (FSB 2007, 2010).

Two proposals were submitted for Unit 2 in 2013. Proposal WP14-03 requested the female deer season be eliminated whereas Proposal WP14-04 asked for an earlier season to be established for Federally qualified subsistence users over the age of 60 or physically disabled. The Council unanimously opposed and the Board rejected these proposals (SERAC 2013; FSB 2014).

Three proposals were submitted for Unit 2 in 2015. Proposal WP16-01 requested a harvest limit reduction for non-Federally qualified users as well as an extension of the Federal season through the month of January. This proposal was broken into two sub-proposals by the Council who opposed the harvest limit reduction but supported the season extension. The Board adopted the proposal as modified by the Council. Proposal WP16-05 requested removal of language regarding a harvest limit reduction during times of conservation because that authority is included by delegation to the Federal in-season manager and WP16-08 requested harvest ticket #5 be used out of sequence when harvesting a female deer. Both proposals were unanimously supported by the Council and adopted by the Board (SERAC 2015; FSB 2016).

PRELIMINARY ASSESSMENT OF REQUESTORS' CLAIMS

Criterion 1. Information not previously considered by the Board

Claim 1.1

STATE OF ALASKA: The Board did not consider the impacts of creating more regulatory confusion where State and private lands are found throughout the Game Management Unit.

Preliminary assessment of Claim 1.1

The extent of Federal public lands was described on page 4 of the staff analysis (OSM 2018a): "Federal public lands comprise approximately 72% of Unit 2 and consist of 72% U.S. Forest Service (USFS) managed lands (see **Unit 2 Map).**" The analysis also specifies that the regulation would only apply to Federal public lands (OSM 2018a, page 13): "The proposal would not change the harvest limit under State hunting regulation or affect harvests occurring on State and private lands."

The issue of differing regulations on Federal and non-Federal lands was specifically discussed during the Board meeting of 11 April, 2018. From page 138 of the transcripts (FSB 2018):

> MR. C. BROWER: Just to the State. So, if this is adopted, there will be no change in their regulations. They'll be still allowed to hunt four deers (sic) on private land and State land, is that right?
>
> MR. SCOTT: Through the Chair, Member Brower. That's correct. The State seasons and bag limits would remain and they'd be applicable to State land and private land.
>
> MR. C. BROWER: So all they have to do is step over one line and get four.
>
> MR. SCOTT: Through the Chair, Member Brower. That's a fair point, right. You know, it's a challenge. But there's differences in both the Federal regulations and the State regulations now in Unit 2. This Board has seen that in a lot of places. So that's a challenge that potentially will continue.

In the motion to adopt the harvest limit portion of proposal WP18-01, Board member Pendleton mentions the effects of having different regulations on both Federal and non-Federal lands in her justification for supporting the proposal on page 141 of the transcripts (FSB 2018):

> MS. PENDLETON: So in consideration of the extensive deliberation of the Regional Advisory Council, the public testimony that has been presented and Tribal consultation as well as the traditional ecological knowledge that has been brought forward, there does appear to be substantial evidence that subsistence needs are not being met. I believe that this proposal could increase harvest opportunity for the Federally-qualified users hunting deer on Federal public lands in Unit 2. As we've also heard, the proposal would not change the harvest limit under State hunting regulation or affect harvest occurring off the Federal lands.

Based on the information presented in the staff analysis and the discussion of the issue in the April 11, 2018 Board meeting, it appears that the Board considered the effects of having differing regulations on Federal and non-Federal lands in Unit 2. In any event, while reduction in the potential for confusion over differing regulations is desirable, the Solicitor's Office has advised that it is not a legally justifiable reason to reverse a prior Board decision.

Conclusion: This claim does not appear to meet the criterion.

Claim 1.2

STATE OF ALASKA, MATHEWS and MECK: The Board should have considered other alternatives within its authority, such as not allowing the harvest of one doe as currently allowed in the 5-deer bag limit, limiting designated hunting or closing Federal lands to hunting.

Preliminary assessment of Claim 1.2

A failure of the Board to consider every possible alternative does not compel reconsideration of its decision. Nevertheless, the alternative of restricting the take of does was discussed in the Board meeting of April 11, 2018. Board member Greg Siekaniec raised the issue during discussion on page 135 of the transcripts (FSB 2018):

> MR. SIEKANIEC: So I'm a little bit surprised if it is a population level discussion why there wouldn't be some consideration given to decreasing the mortality on the production side of it by reducing the doe harvest. You know, maintaining the Federally-qualified users opportunity to have additional days in there, but reducing the doe harvest to help address, if it really is a population level concern, so you keep the production part of the herd there.

The effectiveness of reducing doe harvest was addressed in a response by Don Hernandez (Council Chair) on page 135 of the transcripts (FSB 2018):

> MR. HERNANDEZ: Thank you, Mr. Chair. The doe harvest is always part of our discussions because we do recognize that conventional management practices would call for elimination of a doe season probably as one of the first alternatives. The doe season was implemented a good number of years ago. That has always been kind of considered to be an important practice for traditional hunters is to be able to take a doe and it's always been controversial. We do talk about it quite often. We have kind of been satisfied with the fact that despite there is an opportunity to take a doe, many people who are eligible to take a doe do not choose to do so. I personally know very few people who will shoot a doe. It's kind of a last resort. All the evidence shows that the doe harvest has remained very low. I think with 4,000 deer approximately taken, there might only be about 100 does taken. We're satisfied that we can continue to have a doe hunt without seriously impacting the deer populations.

Over the years, the Board has received numerous proposals to limit designated hunting and generally the Board has not restricted designated hunting to reduce harvest. Harvest has typically been reduced using changes to methods, means and open or closed areas. The importance of the Federal designated hunting provisions was described in Proposal WP18-09 (OSM 2018b) which was considered in the same meeting as WP18-01:

The subsistence way of life is a part of the social fabric of Alaskan rural communities. Within Alaska Native cultures, the harvesting of subsistence foods is inextricably intertwined with social interactions. Social interactions may be in the form of extended families spending time at fish camps during the summer, young hunters learning harvesting skills from their older relatives, or individuals sharing their harvest successes with community members. Subsistence includes a cultural value system of sharing, which Alaska Natives have maintained since before contact with Russians and Europeans (Wolfe and Ellana 1983).

The hunting of ungulates in Southeast Alaska is a physically demanding task, which not every household in a given community is able to undertake. It is common for able-bodied, younger individuals to take on the responsibility of harvesting meat for families and individuals outside of their household (i.e. the elderly and single mothers). Deer and moose are vital food staples and an important protein source for many rural Alaskans.

In 1997, the Alaska Department of Fish and Game (ADF&G) Division of Subsistence conducted key respondent interviews in Prince of Wales (POW) Island communities and Ketchikan regarding subsistence deer hunting on POW Island. Hunting and sharing practices are similar throughout most POW Island communities, and it was noted that some hunters regularly supply deer to other households as well as their own (Turek et. al 2004). Several individuals mentioned this pattern specifically in their responses. Communities such as Hydaburg, which is predominantly populated by Alaska Natives, had similar answers to the same questions as Pt. Baker and Port Protection whose populations are mostly non-Native. It is anticipated that comparable information would be found if the same study were conducted in communities of Units 1B and 3 (OSM 2018b).

Conclusion: This claim does not appear to meet the criterion.

Claim 1.3

EDWARDSON, HENDRICKSON and MECK: The Board did not consider the negative impacts on the economy of Prince of Wales.

Preliminary assessment of Claim 1.3

Although the economies of the communities in Unit 2 are very important, the Board is under no legal obligation to consider the economic impact of complying with its statutory obligation under Title VIII to provide a meaningful priority for rural users. For that reason, economic impacts do not constitute relevant information that the Board failed to consider.

Conclusion: This claim does not appear to meet the criterion.

Claim 1.4

HENDRICKSON and MATHEWS: Increases in wolf and black bear populations in Unit 2 have had an effect on deer populations and should be addressed.

Preliminary assessment of Claim 1.4

Regulations are in effect to regulate the sustainable harvest of wolves and black bears in Unit 2. The OSM analysis presented information about the effects of wolves and black bears on deer populations to the Board. "Wolves and black bears are the primary predators present in Unit 2 and may reduce deer populations or decrease recovery times after severe winters (OSM 2018a)".

Additionally, to the extent that the requestors may be suggesting that the Board should engage in predator management for the purpose of increasing deer populations, the Board has a longstanding policy of deferring predator-related actions to individual land managing agencies to act in accordance with the specific mandates of those agencies. This is described in the Board's Predator Management Policy (Appendix 3).

Conclusion: This claim does not appear to meet the criterion.

Criterion 2. The existing information used by the Board is incorrect

Claim 2.1

STATE OF ALASKA: We have reason to believe the actual number of deer harvested in some Unit 2 communities is far higher than harvest estimated by ADF&G's Division of Wildlife Conservation (DWC).

Preliminary assessment of Claim 2.1

The issue was described in comments from ADF&G on page 627 of the Board meeting book (OSM 2018a). ADF&G compared 1997 household survey deer harvest information with the 1997 mail-out deer hunter survey for Hydaburg, Craig and Klawock and concluded that "ADF&G's mail-out hunter surveys and more recently, by harvest ticket reports, may greatly underestimate the actual number of deer harvested by residents of these communities".

The Board understood that this was a possibility but rejected it as a relevant consideration after considering the scientific data available for deer in Unit 2 through the OSM analysis (OSM 2018a) and information provided by ADF&G (FSB 2018). In addition to biological data presented, the Board also considered substantial public testimony asserting that subsistence needs were not being met and the long history of conflict regarding deer allocations in Unit 2 (FSB 2018).

Conclusion: This claim does not appear to meet the criterion.

Claim 2.2

ALLEN: This regulation does not take into account the Amount Reasonably Necessary for Subsistence (ANS) as defined by the State.

Preliminary assessment of Claim 2.2

The Amount Reasonably Necessary for Subsistence is a measure used by the State and does not have a role in the Federal Subsistence Board's determination of whether or not the rural priority for subsistence uses is being properly implemented.

Conclusion: This claim does not appear to meet the criterion.

Criterion 3. The Board's interpretation of information, applicable law, or regulation is in error or contrary to existing law

Claim 3.1

STATE OF ALASKA, EDWARSON, HENDRICKSON and MATHEWS: The biological data shared by the ADF&G was used incorrectly. A one-year decline in estimated harvest is not justification for permanent regulatory decision making to reduce bag limits.

Preliminary assessment of Claim 3.1

The Board was clearly aware of the scientific data available for deer in Unit 2 through the OSM analysis (OSM 2018a) and information presented by ADF&G (FSB 2018). In addition to biological data presented, the Board also considered substantial public testimony asserting that subsistence needs were not being met and the long history of conflict regarding deer allocations in Unit 2 (FSB 2018). The Board weighed many sources of information to arrive at its decision, not just one year of biological data. Moreover, regulatory decisions are never "permanent." They can be rescinded or modified by the Board as appropriate in response to changing circumstances or new information.

Conclusion: This claim does not appear to meet the criterion.

Claim 3.2

STATE OF ALASKA, ALLEN, EDWARDSON, HENDRICKSON and MATHEWS: The Southeast Alaska Subsistence Regional Advisory Council is making its recommendation based on public testimony and potentially personal bias, not on the available science.

Preliminary assessment of Claim 3.2

As evidenced by the background section of this document, the Council has a long history of listening to users of deer in Unit 2 and considering scientific information that has been provided by OSM staff analyses and ADF&G in formulating their recommendations.

A fundamental function of the Council under Title VIII of ANILCA is to incorporate local feedback into its process of developing recommendations to the Board. Section 805(a) of ANILCA states:

> *Each regional advisory council shall be composed of residents of the region and shall have the following authority:*
> *(3) the encouragement of local and regional participation pursuant to the provisions of this title in the decisionmaking process affecting the taking of fish and wildlife on the public lands within the region for subsistence uses;*

To this end, the Council submitted this proposal after public testimony during the winter 2017 meeting in Craig (SERAC 2017), where Federally qualified subsistence users testified that they had a harder time harvesting deer in Unit 2 during the 2016 season. In supporting its proposal, the Council felt that subsistence needs were not being met and a reduced harvest limit for non-Federally qualified users would provide a rural resident priority. The Council also felt that non-Federally qualified users would not be adversely affected since they average 2 deer per hunter and a reduction from 4 to 2 male deer would not make a huge difference in their overall harvest.

The Council's consideration of scientific information for WP18-01 is evident in their deliberation. For instance, the Council voiced concerns that if the ADF&G harvest objective continues to be exceeded, there could be an imminent conservation shortage if the Council did not take pre-emptive action to provide for rural subsistence preference (SERAC 2017).

Conclusion: This claim does not appear to meet the criterion.

Claim 3.3

STATE OF ALASKA: The Board does not have the authority to unnecessarily restrict State of Alaska subsistence or other uses.

Preliminary assessment of Claim 3.3

Title VIII, § 815(3) of ANILCA addresses the restriction on the take of fish and wildlife for nonsubsistence uses. § 815(3) of ANILCA states:

> *Nothing in this title shall be construed as—*
> *(3) authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on the*

> *public lands (other than national parks and park monuments) unless necessary for the conservation of healthy populations of fish and wildlife, for the reasons set forth in §816, to continue subsistence uses of such populations, or pursuant to other applicable law;*

The OSM analysis states (OSM 2018a):

> In regards to adjusting State seasons and harvest limits, Title VIII, § 815(3) of ANILCA provides that Federal public lands can be closed to non-subsistence uses when it is necessary to restrict harvest in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such population. It is the Board's view that because it has the authority to close non-subsistence uses under these circumstances, it would have the authority to take a lesser action, such as limiting the take of fish and wildlife for non-subsistence use.

The Board adopted the proposal at issue based on a finding that restricting the taking of deer on public lands was necessary for the continuation of subsistence uses of such population. The fact that the Board rarely exercises its authority in this manner does not diminish that authority.

Conclusion: This claim does not appear to meet the criterion.

Claim 3.4

STATE OF ALASKA: Consultation is necessary to evaluate whether proposed Federal regulatory actions are "*consistent with management of fish and wildlife in accordance with recognized scientific principles*" and "*assure the continued viability of a fish or wildlife population,"* which Congress recognized is the purview of the State.

Preliminary assessment of Claim 3.4

ADF&G provided significant information relating to Unit 2 deer and is always encouraged to participate at many points throughout the regulatory process by submitting proposals, providing input to OSM analyses, and providing comments on proposals at Interagency Staff Committee, Council and Board meetings.

Although ADF&G's participation is integral to the process, ANILCA does not reserve to the State an oversight role to determine if Federal regulatory actions are "*consistent with management of fish and wildlife in accordance with recognized scientific principles*" and "*assure the continued viability of a fish or wildlife population …."* Rather, ANILCA requires the Secretaries of Agriculture and Interior to ensure that Federal regulatory actions are "*consistent with management of fish and wildlife in accordance with recognized scientific principles*" and "*assure the continued viability of a fish or wildlife population".* The Board has been delegated that authority and obligation by the Secretaries. Under ANILCA, the Board also must consider the continuation of subsistence uses, as stated in § 815(3) and provide a meaningful priority for Federally qualified users on Federal public lands, as stated in § 804:

> *Except as otherwise provided in the Act and other Federal laws, the taking on public lands of fish and wildlife for nonwasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes.*

Conclusion: This claim does not appear to meet the criterion.

Claim 3.5

STATE OF ALASKA: The Board's bag limit restriction is unnecessary and unjustified in these circumstances and this is the first known occurrence of the Board reducing State of Alaska bag limits. Adoption of this proposal was arbitrary and contrary to the science and recommendations provided by staff.

Preliminary assessment of Claim 3.5

Title VIII, § 815(3) of ANILCA addresses the restriction on the take of fish and wildlife for nonsubsistence uses.

The Council recommendation, and Interagency Staff Committee comments on page 622 support that the restriction was necessary:

> The Council felt that subsistence needs were not being met. The Council decided that this reduction would provide a rural resident priority, would not adversely affect nonsubsistence users as they already average two deer per hunter and reduction would not make a huge difference in their harvest overall. The Council voiced concerns that if the harvest objective continues to be exceeded, there could be an imminent conservation shortage if the Council does not take pre-emptive action now and provide for rural subsistence preference (OSM 2018a).
>
> The Interagency Staff Committee found the staff analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and Federal Subsistence Board action on the proposal (OSM 2018a).

The Board was clearly aware of the recommendations of staff and the scientific data available for deer in Unit 2 through the OSM analysis (OSM 2018a) and information presented by the ADF&G (FSB 2018). The Board also heard substantial public testimony directly and through the Council, and considered the long history of conflict regarding deer allocations in Unit 2. The Board weighed all sources of information and determined that the restriction of nonsubsistence uses was necessary to continue subsistence uses of deer in Unit 2. The justification for the restriction was stated by Ms. Pendleton on page 141 of the transcripts (FSB 2018):

> MS. PENDLETON: So in consideration of the extensive deliberation of the Regional Advisory Council, the public testimony that has been presented and Tribal consultation as well as the traditional ecological knowledge that has been brought forward, there does appear to be substantial evidence that subsistence needs are not being met. I believe that this proposal could increase harvest opportunity for the Federally-qualified users hunting deer on Federal public lands in Unit 2. As we've also heard, the proposal would not change the harvest limit under State hunting regulation or affect harvest occurring off the Federal lands. Finally, between 2005 and 2015 non-Federally-qualified hunters in Unit 2 average less than two deer per season, 1.9 deer per hunter, which implies that most non-Federally-qualified hunters would not be adversely impacted by the proposal.

Conclusion: This claim does not appear to meet the criterion.

Claim 3.6

STATE OF ALASKA: Assuming the Board was authorized to change the bag limit, the Board did not clearly delineate the conditions under which State management would resume. This lack of consideration and clear criteria make it almost impossible for the State of Alaska to regain management once the Board has superseded State of Alaska regulations.

Preliminary assessment of Claim 3.6

The Board provides the opportunity for anyone to submit proposals to change the wildlife regulations every other year. The Board also provides opportunity for anyone to submit a special action request at any time. The Board also accepts requests to reconsider an action (Appendix 2). Through any of these avenues, the Board may determine that the situation has changed to the point that the restriction is no longer needed or should be modified.

Conclusion: This claim does not appear to meet the criterion.

SUMMARY

As discussed above, the claims submitted by the State of Alaska, Matt Allen, Chas Edwardson, Jeff Hendrickson, Andy Mathews and William Meck do not appear to meet the criteria. No new relevant information was presented for the Board's consideration. None of the information the Board relied on was shown to be factually incorrect. There was no demonstration that the Board's interpretation of information, applicable law, or regulation was in error or contrary to existing law.

OSM CONCLUSION

Oppose the request to reconsider WP18-01.

Justification

The proponents claims individually and collectively fail to reach the threshold for reconsideration as required under Federal subsistence regulations 36 CFR 242.20 and 50 CFR 100.20.

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INTERAGENCY STAFF COMMITTEE RECOMMENDATION

Do not support request for reconsideration RFR18-01.

Justification

The Interagency Staff Committee (ISC) found the threshold analysis for request for reconsideration RFR18-01 to be a thorough evaluation of the request and that it provides sufficient information for Federal Subsistence Board (Board) action on the request.

According to regulations under Subpart B §___.20 the Board will accept a request for reconsideration only if it is based upon information not previously considered by the Board, demonstrates that the existing information used by the Board is incorrect, or demonstrates that the Board's interpretation of information, applicable law, or regulation is in error or contrary to existing law. The ISC concurs with the following conclusions presented in the RFR18-01 threshold analysis:

- No new relevant information was presented for the Board's consideration.
- None of the information the Board relied on was shown to be factually incorrect.
- There was no demonstration that the Board's interpretation of information, applicable law, or regulation was in error or contrary to existing law.
- There are sufficient conservation concerns to warrant restriction for nonsubsistence use, as outlined in Section 815, while Section 804 of ANILCA establishes that subsistence is the priority consumptive use on Federal public lands.

The claims of the State of Alaska, Matt Allen, Chas Edwardson, Jeff Hendrickson, Andy Mathews and William Meck do not appear to meet the criteria. None of the claims in RFR18-01 meet the threshold for reconsideration of the Board's decision on Wildlife Proposal WP18-01.

THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Fish and Game

OFFICE OF THE COMMISSIONER
Headquarters Office

1255 West 8th Street
P.O. Box 115526
Juneau, Alaska 99811-5526
Main: 907.465.4100
Fax: 907.465.2332

Date: May 11, 2018

To: Anthony Christensen, Chair
Federal Subsistence Board

From: Sam Cotten, Commissioner
Alaska Department of Fish and Game

Subject: The Alaska Department of Fish and Game is submitting a request for reconsideration of the wildlife proposal 18-01 that was adopted April 10, 2018, at the Federal Subsistence Board meeting.

I. Background Legal Principles

Recently the Federal Subsistence Board ("Board") adopted wildlife proposal 18-01 to reduce the bag limit for nonfederally qualified users hunting deer on federal public lands in Unit 2. The Alaska Department of Fish and Game (ADF&G) submitted comments explaining why adoption of the proposal would not be appropriate, and the Office of Subsistence Management (OSM) submitted its recommendation opposing the proposal as well.

Alaska has the constitutional and statutory obligation to manage and protect wildlife within its borders, including on federal lands, except to the extent expressly preempted by Congress when acting under U.S. Constitutional grants of authority to the federal agencies.[1] Title VIII of ANILCA provides a subsistence hunting priority for federally qualified users on federal public lands. However, there is nothing in ANILCA that clearly states the authority of the federal government to displace Alaska's authority to affirmatively authorize and manage hunting by nonfederally qualified users on federal public lands.

In *Alaska v. Federal Subsistence Bd.*, 544 F.3d 1089, 1100 (9th Cir. 2008), the Ninth Circuit ruled that, under ANILCA, the Federal Subsistence Board may regulate subsistence use but is prohibited from limiting nonsubsistence use. A bag limit for non-federally qualified users for deer in Unit 2 is inconsistent with ANILCA under applicable case law on federal preemption.

Section 815 of ANILCA authorizes federal restrictions on nonsubsistence uses on the public lands only if "necessary for the conservation of healthy populations of fish and wildlife" or if necessary to "continue subsistence uses." Neither of these reasons applies here.

II. Discussion

[1] *Hughes v. Oklahoma*, 441 U.S. 322 (1979); *Kleppe v. New Mexico*, 426 U.S. 529, 545 (1976); *Geer v. Connecticut*, 161 U.S. 519, 528 (1896), *overruled on other grounds by Hughes*, 441 U.S. at 322; 43 C.F.R. § 24.3(a).

A. Information not previously considered by the Board

The Board did not consider statutes and court decisions determining it does not have the legal authority to adopt a bag limit for deer for nonfederally qualified users in Unit 2.

Assuming the Board did have such authority, which it lacks under ANILCA and Ninth Circuit precedent, the Board did not consider how the regulation would be noticed to the affected hunters, how the proposed changes in bag limit would be enforced, or the impacts of creating more regulatory confusion where state and private lands are found throughout the Game Management Unit.

If there was an actual conservation concern, the Board should have considered other alternatives within its authority, such as not allowing the harvest of one doe as currently allowed in the 5-deer bag limit or closing federal lands to hunting. Similarly, if there are not enough deer to meet all uses, the restricting the take of does would increase the number of males available for harvest. This was not considered or discussed.

The decision appears to be based on comments from local individuals who simply want to exclude "outsiders." This is not a valid reason for making subsistence management decisions. It is difficult to identify any federal lands in Alaska where the local federally qualified users would not prefer more restrictive seasons and bag limits be placed on nonfederally qualified users. This will eventually result in a third tier of regulations. Regulatory complexity is a well-known barrier to participation in hunting, trapping and fishing. Another well-known barrier is hunt area boundaries that are difficult to identify. These unintended consequences were not considered by the Board and are not consistent with other purposes of the federal lands in question.

B. The information used by the Board is incorrect

The biological data shared by the Alaska Department of Fish and Game was not used correctly. A one-year decline in estimated harvest is not justification for permanent regulatory decision making to reduce bag limits. The Federal Subsistence Board should rely on recommendations by the state of Alaska, as the sovereign trustee for fish and wildlife, in making decisions to modify or reject proposals based on conservation issues and impacts on the state's sustainable management of fish and wildlife. If the Board is going to disregard the ADF&G's assessment of species conservation status and sustainable harvest levels, it should clearly state on the record where and how it finds the ADF&G's analysis to be flawed.

Public testimony indicated the deer population had declined and asserted that subsistence needs were not being met. Based on harvest data, current harvest levels are only slightly below (~112 deer) the average harvest over the previous 10 years (2007-2016). Numbers of federally qualified and non-federally qualified hunters hunting in Unit 2 peaked in 2015, and both declined in 2016. That decline in hunter effort could explain the decline in number of deer harvested in 2016 compared to 2015. The 3.3 days of hunting effort required for a federally qualified hunter to harvest a Unit 2 deer in 2016 remained comparatively low and was statistically similar to the 10-year average of 3.4 days. These data do not suggest a declining deer population or a conservation concern. Further, deer in alpine areas on northern and central Prince of Wales Island were

surveyed by air during summer 2017. Based on deer seen per hour surveyed, the central portion of Prince of Wales Island (POW) had the second highest counts in the region, trailing only southern Admiralty Island where deer are most abundant. Counts on northern POW were higher than most areas surveyed in Unit 3 and similar to northeastern Chichagof Island in Unit 4 where deer are also considered abundant.

We have reason to believe the actual number of deer harvested in some Unit 2 communities is far higher than harvest estimated by ADF&G's Division of Wildlife Conservation (DWC). Those estimates are the only regularly collected unbiased source of information on deer harvest in Unit 2. DWC estimated annual total deer harvest through RY2010 using a deer hunter survey mailed to one third of hunters in each community. Since RY2011, harvest estimates have been derived from mandatory harvest ticket reports. The magnitude of harvest estimated using the survey and harvest ticket reports did not change, so DWC believes they produce similar results.

Although reporting is mandatory, RY2016 reporting rates in the Unit 2 communities of Craig, Klawock, and Hydaburg were 46%, 36%, and 30%, respectively. Other Unit 2 communities reported at higher rates, and statewide about 70% of deer hunters submitted reports. Low reporting rates by individual communities add uncertainty and potentially bias, to DWC's total deer harvest estimates for those communities.

Investigating potential bias in DWC's harvest estimates for those three communities required finding another unbiased source of deer harvest information. Only one source could be found. In 1997 the ADF&G, Division of Subsistence completed a wide-ranging survey of subsistence resources used by residents of Craig, Klawock, and Hydaburg including deer. DWC compared estimated total harvest derived from the 1997 household subsistence surveys to estimated total harvest derived from 1997 deer hunter surveys. Harvest estimated using the household subsistence surveys was generally 2 to 4 times higher than harvest estimated using deer hunter survey data. A 2012 household survey in Hydaburg and more recent anecdotal information support the contention that actual harvest remains far higher than reported in those communities.

The OSM analysis prepared by Forest Service subsistence biologists relied on ADF&G data. Both OSM and the ADF&G found no biological concern or reason to adopt proposal WP18-01. In adopting ANILCA, Congress stated its intent that "recognized scientific principles" would govern decisions. *See* Section 802(1). The Board is authorized under ANILCA to restrict uses other than federally qualified subsistence uses only if necessary to address a conservation concern or if a restriction is needed to continue subsistence uses. Evidence in the record does not support a biological concern or a need to restrict deer hunting by nonfederally qualified users.

C. The Board's interpretation of information, applicable law, or regulation is in error or contrary to existing law

The Board does not have the authority to unnecessarily restrict state of Alaska subsistence or other uses. ANILCA Section 1314 affirms the state of Alaska's sovereign responsibility and authority for management of fish and wildlife on all lands *"except as may be provided in title VIII."* Numerous sections in Title VIII specifically recognize the state of Alaska's role in providing the priority for customary and traditional subsistence uses of fish and wildlife on

federal public lands. Consultation is necessary to evaluate whether proposed federal regulatory actions are "*consistent with management of fish and wildlife in accordance with recognized scientific principles*" and "*assure the continued viability of a fish or wildlife population,"* which Congress recognized is the purview of the state. The extent and consistency of directions in ANILCA Title VIII confirm that Congress intended for the state of Alaska to continue to manage fish and wildlife in accordance with established scientific principles, to continue to regulate harvests and other uses, and to be involved in implementation of the federal subsistence priority. The state of Alaska, and not the Board, is authorized to establish methods and means and to establish seasons for nonfederally qualified users.

Furthermore, the Board's bag limit restriction is unnecessary and unjustified in these circumstances and this is the first known occurrence of the Board reducing state of Alaska bag limits. As directed by Congress in Section 802 of ANILCA, subsistence uses of wildlife shall be the priority consumptive use on federal public lands "when it is necessary to restrict taking in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such population." Section 815 of ANILCA provides that a restriction on taking wildlife for non-federally qualified hunters is only authorized if "necessary for the conservation of healthy populations of fish and wildlife, for the reasons in Section 816, to continue subsistence uses of such populations, or pursuant to other applicable law." None of those reasons apply. There is no conservation concern for the deer population. The deer population continues to be viable, as explained in section B above and as indicated by the generous bag limits for federally qualified users (5 deer, 1 of which may be a doe) and a lengthy hunting season (July 24-January 31); this season length represents 54 additional days of hunting opportunity compared to hunters hunting under state regulations. No restrictions are needed to continue subsistence uses of deer. There is no credible argument that restricting nonfederally qualified hunters to two bucks instead of 4 is necessary to continue subsistence uses. The effect is likely to be very marginal and any benefit will not be quantifiable.

No other applicable laws support the proposed restrictions. The Board had no justification or legal authorization to adopt this proposal.

Assuming the Board was authorized to change the bag limit, the Board did not clearly delineate the conditions under which state management would resume. This lack of consideration and clear criteria make it almost impossible for the state of Alaska to regain management once the Board has superseded state of Alaska regulations. For example, the Board should consider how many days per deer harvest would allow state bag limits to again apply on federal lands for nonfederally qualified users or how many deer reported to be harvested by federally qualified users would be sufficient? Without such criteria and quantified reasons for superseding state of Alaska authority, these actions essentially become permanent. We consider this a major shortcoming of the federal subsistence management program.

III. Conclusion

The Board should reconsider adoption of 18-01 because it did not have the legal authority to take such action. Even if the Board had such authority, its adoption of this proposal was arbitrary and contrary to the science and recommendations provided by staff, did not fully discuss the nuances of the status of the deer population and harvest trends on an annual basis, and it lacked

consideration of who would administer and enforce this unwarranted rule. The board should reconsider its decision.

Matt Allen
1158 Salmon Row
Ketchikan, AK 99901
907-617-06003
afkallen@yahoo.com

Regulation WP18-01, April 2018

How I will be adversely affected

As a resident of Revillagigedo I will be adversely affected by WP18-01. Since 2004 I have conducted annual deer hunts on Prince of Wales. I have been fortunate enough to harvest two or more deer multiple times and those deer have been an important part of my diet as well as the diet of family and friends who I have the opportunity to share with. I have shared the hunting experience with friends and have introduced family to hunting through the opportunities POW offers.

I have put in my time and due diligence hunting Revillagigedo, specifically Neets Bay as I lived there from 2004-2015. I often times filled many of my tags at Neets, however, since moving to Ketchikan proper in 2015 I have only had the opportunity to harvest one buck despite frequent hunts each season. Prince of Wales and the pursuit of its blacktail has taken on greater significance and I now depend on the opportunity it provides. This new regulation will have immediate and direct negative effects on my life and lifestyle.

I am also disturbed to know my purchase of a hunting license and the science and Department it supports can so easily be ignored.

Information not previously considered or that is incorrect

It is evident from the Federal Subsistence Board April 2018 public materials that the Advisory Council is making its decision based on public testimony and potentially personal bias, not on the available science. This regulation is defined as a pre-emptive measure according to the Council which further indicates this is currently a perceived issue and not a current biological one. The decision making process on this regulation is disturbing because it indicates a shift from science based management and the recommendation of the State of Alaska as well as the Office of Subsistence Management. If this precedent is made then I would fully expect to see additional non-science based proposals and regulations in the future. I would like to know the Boards reasoning for approving this regulation despite the available science.

This regulation does not take into account the “ANS” or the Amount reasonably Necessary for Subsistence as defined by the State. The State’s data indicates that for federally qualified subsistence hunters they have been harvesting deer at similar or greater historical levels and in less time .

The regulation does not indicate how the blacktail population will be monitored and managed going forward to allow for a reversal of this regulation. This is particularly disturbing because once a regulation is imposed it is significantly harder to eliminate especially when the decision is not based on science in the first place. Is the Council going to hold a meeting in Craig annually and ask federally qualified subsistence utilizers if they are harvesting the deer they need(how is this determined) and if so, would they support an amendment to the regulations. If the reasoning behind this regulation is perceived rather than based in fact and sound science then any reversal will be made on people’s relative success any given year in harvesting deer.

Changes to the Regulation

I would prefer the regulation be rescinded.

If not removed, I would like to see an amendment that would make it mandatory for all federally qualified and non-qualified hunters of Unit 2 to submit detailed hunt and harvest report, regardless if they hunt or not. If our management decisions are not going to be made with the available science then we had better mine the information that is available but underreported. If utilizers of this resource can not or will not report completely and truthfully their pursuit of this resource, they should not be allowed to hunt period.

I would also like to see a detailed plan of management . A plan to be acted upon, to evaluate the population, the population monitoring techniques as well as more thoroughly investigate predator prey relations/utilization(human, wolf, bear vs. deer). I would also like to see an evaluation concerning subsistence deer hunting and whether there should be limits based on need(how is need determined) and not want. The recent difficulties in harvest either perceived or factually based should be investigated to better understand and define what is occurring with this resource and whether a management action as drastic as this is warranted. To not do our due diligence is disrespectful to the resource, those charged with its management and those who pursue or depend on that resource, whether directly or indirectly. Just because this resource is available and individuals have a subsistence claim to harvest does not guarantee it should be easy or guarantee a certain amount of harvest.

I would hope this regulation will be reconsidered and rescinded based on the science.

Thank you for your time and the opportunity to share my comments and concerns.

Sincerely,

Matt W. Allen

Fwd: [EXTERNAL] Illegal action by federal subsistence board prince of whales island with deer harvest reductions

2 messages

AK Subsistence, FW7 <subsistence@fws.gov> Fri, Apr 27, 2018 at 1:00 PM
To: Gene Peltola <gene_peltola@fws.gov>, Thomas Doolittle <thomas_doolittle@fws.gov>, Jennifer Hardin <jennifer_hardin@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

---------- Forwarded message ----------
From: **Chas Edwardson** <chasedwardson@hotmail.com>
Date: Wed, Apr 25, 2018 at 6:10 AM
Subject: [EXTERNAL] Illegal action by federal subsistence board prince of whales island with deer harvest reductions
To: "subsistence@fws.gov" <subsistence@fws.gov>

I am writing regarding a recent action taken by the federal subsistence board limiting access to federal land to non rural residents of Alaska. I have a house in Coffman cove and I grew up fishing on the west coast of POW, my grandparents first language was haida and were well established on prince of whales island , I know the history and economics of POW .
This action is misguided , unwise , misleading , based on false statements by members of the subsistence board, and goes against all OSM , ADFG, recommendations and is based not on science but inflammatory rhetoric and a false narrative generated by prince of whales island "residents " . Many of those residents are residents of prince of whales for fewer years than my 5 year old grandson.

Here are a few facts that will be coming to public attention in the years to follow,

1. If this was framed as a traditional use issue for indigenous people of prince of whales you were sold a false narrative. The recently migrated people to haidaburg from Canada come from an island in British Columbia that is now called haida Gwii there were no deer native to the island were we came from and the chairman of the subsistence board knows that ,as his maternal grandmother who is also my maternal grandmother thus his entire family came from haida gwii . There are no songs, historical reference to,or totems with deer as a subject until recently after we arrived on Prince of Whales island so we need to stop with the "native traditional narrative. Further the natives that hunted on the island for deer hunted in very specific spots and rarely traveled over land or great distances for the deer they did harvest the calories from a deer you get versus the calories you burn did not make it feasible for indigenous people to expend much effort on deer , there diet was and is mainly high calorie low effort fish. To insinuate that the rural residents need an entire multi million acre island to hunt is ludicrous, even with a federally funded and maintained super highway linking virtually all towns on pow rarely do you see a resident from haidaburg up in Coffman , or thorn bay. So to insinuate that traditionally we used the whole island is simply false, untrue, misleading etc,etc.

2. Prince of whales island resident poach more deer than all of Ketchikan and any and all visitors to that island combined. Many residents do not get hunting licenses and take as many as 10-15 deer this is well known by everyone including the federal subsistence board, ADFG.

3. The federal subsistence board based their decision on the single fact that it was hard to get deer , no science no facts just that it was hard to get deer for the last few years.

4. This whole problem of deer being harder to get was generated by the prince of whales island residents themselves, by supporting water barring hundreds of miles of roads in an effort to stop people from coming to an island that they some how view as "there " island . This was another shortsighted hillbilly mentality move that only did one thing which was the forced concentration of hunting on fewer roads .

4. The population of deer island wide is healthy and growing , the focused attention that is spent hunting on the few remaining roads has thinned out a population of deer we reference to as road deer " the dumshit deer" which the residents on prince of whales had become accustomed to , most residents on the island road hunt exclusively and do not view it as a sport as well as a supplement to their freezer. Very few of the loudest complainers actually get off the he road system and hunt deer the " traditional "way that
The majority of us hunters do.

5. The economic ramifications will further hinder an already depressed economy , but again the loudest complainers usually are sporadic workers and do not own business in the visitor industry.

6. This action taken by the federal subsistence board did not even consider an economic impact study which was negligent , and extremely short sighted once again and could very well have a significant and serious financial ramifications for many island residents.

7. Many fuel company's ,grocery stores , sporting good stores , etc,etc, have come to rely on the seasonal uptick that visitors on the island generate in revenue, when they visit the island primarily to hunt, and fish.

8. The negligent part of this whole thing and possible criminality of negative impacts on a whole economy of prince of whales is that this action of limiting non rural residents to two deer is not based on science, goes against the OSM (office of subsistence management) and the ADF&G Alaska Department of Fish and game recommendations in effect causing a negative economic impact on residents of prince of whales island who did not support the action taken by the federal subsistence board .

Best regards
Charles Edwardson
907-254-9000
Owner
Edwardson Enterprises
Sent from my iPhone

AK Subsistence, FW7 <subsistence@fws.gov>

[EXTERNAL] RFR for WP-18-01

Jeff Hendrickson <duffmeister007@gmail.com> Tue, May 1, 2018 at 8:59 AM
To: subsistence@fws.gov

TO: The Office of Subsistence Management

Attn: Subsistence Policy Coordinator

1011 East Tudor Road, Mail Stop 121

Anchorage, Alaska 99503-6199

Inre: WP 18-01 – Request for Reconsideration

Good day,

I am writing this letter as a request for reconsideration of the actions taken by the Federal Subsistence Board on WP 18-01, regarding the deer harvest on Prince of Wales Island (POW). The action taken by the board was based on testimony from groups of people who have been attempting to get this action in place for over 20 years, not due to declining deer populations, but due to not wanting competition from Ketchikan hunters. The actions went against the recommendations of the game biologists who testified that deer populations have not been declining. I have been hunting POW since the 1980s, twice per year for most of those years. In that time, I have seen the population of the deer “on the road system” go up and down many times. It all depends on predation and traffic on the road system. The one constant I have always found, including last year (2017), is that if you are willing to get out of your vehicle and walk a little bit the deer are there.

I hunt deer to provide for my family. We do not eat beef as it is pumped full of hormones, is very expensive, and is not as healthy for my family and I. My doctor has confirmed this dietary choice as well stating the same. This is a choice we have made and one that I was raised with by my dad and my grandpa before him. We have always subsisted on deer meat. This action is going to have a direct effect on our traditional and historically based provision for our family.

Below is some of the comparison data for Revilla Gigedo Island vs. Prince of Wales:

Revilla Gigedo Island

· Access to deer hunting is very limited without having a boat to get out away from the road system, and even with a boat in the few areas that one can go around Ketchikan with an anchorage to leave a boat unattended.

· Hunting from the Revilla Island road system is almost non-existent due to the sheer amount of pressure that is generated by having less than 50 miles of road to spread out and hunt.

· Revilla Gigedo island is 61 square miles and has an approximate population of 13000 people.

· Ketchikan (Unit 1A) is only allowed to hunt from August 1 to November 30.

Prince of Wales Island

· POW in contrast has approximately 2800 miles of road, some of which are only accessible on foot, for everyone to spread out and be able to have access to the areas in which to hunt.

· There are 2230 square miles of land on POW with a population base of roughly 4000 people.

· POW residents have been given part of July and the months of December and January in which to hunt where only rural hunters can participate.

· POW/Rural residents are allowed 5 deer compared to 4 for non-rural persons.

· POW/Rural residents are allowed to shoot a doe from October 15 to the end of the season.

· The Alaska Fish and Wildlife protection officers have stated that 70% + of the deer harvest on POW are by POW locals and that 95% of tickets written for poaching, wanton waste, shooting from a drivable surface, and other violations are by POW residents.

The action that was taken by the board has limited hunters from non-rural areas to 2 deer on POW. There are several problems with this scenario. The first being, if I am lucky enough to shoot a deer in the Ketchikan area, the number of deer I get prior to hunting on POW is limited by that same number. If I shoot 1 deer in Unit 1A I can only shoot 1 on POW. If I shoot 2 deer in Unit 1A I cannot hunt POW at all. This is, in essence, ensuring that I will not be able to provide for my family and will create great hardship on my family. I have never shot more than 2 deer in Unit 1A in my 40+ years of hunting the Ketchikan area. I have always been able to supplement what I have been unable to get in Unit 1A with deer from Unit 2. You are now taking away my ability to subsist in the manner that I have traditionally, historically, and customarily done for 40 + years by making it to

where I can only use tags 1 and 2 on POW. I have severe arthritis in both knees and my hip and just had one hip replaced so August hunts climbing to the Alpine are not an easy option for me. This is part of the reason I hunt the POW in November. I do not have to walk as far to get a deer.

It is my understanding that the State of Alaska game biologists do not support this action, nor do most of the residents of Alaska. The fish and game of Alaska belong to all peoples of Alaska not just a few who have been very vocal in attempting to shut down the hunting, fishing, logging, and other areas of Alaska for over 20 years that I know of. I remember vividly the attempt to shut everything down by utilizing the Alexander Archipelago Gray Wolf as the reason for the protections and shutdowns. This was when the protections began to be put in place for the wolf and created the wolf population explosion that we saw last fall. In my 35+ years of hunting POW I saw more wolves and wolf sign than all the other 34 years combined. There were wolves literally everywhere that I hunted last November. This is a problem that definitely needs to be rectified.

In the 35+ years I have hunted POW the north end of the island was hunted mostly by people from Ketchikan. Prior to the paved highway running most of the way up the island it was a 6 hour drive on rough roads to get up there and the locals of POW did not drive that far to hunt. For them to claim this as their traditional hunting area is not true. The Haidas and other tribes migrated from Canada in approximately 1830. This was never their traditional lands or hunting areas. I know many people from Hydaburg, Craig, and Klawock and the one thing all of them have told me is that that was always too far to go for a day hunt and they didn't see the need to go up there.

One last thing to consider that has been overlooked in this entire process is the economic impact this action will have on the businesses of POW, the IFA Ferry, the air taxi services to the island, grocery stores, gas stations, restaurants, bed & breakfasts, cabin rentals, etc. Hunters from Ketchikan contribute a lot of money to the communities across the island and there will be a tremendous impact on all of those businesses. I already have had confirmation of land owners on POW that were developing their properties for cabin rentals and other businesses that are now cancelling their plans. That is a really sad side effect of this action that has been taken by the subsistence board.

Thank you for your time. Please reconsider your actions carefully and look at all of the options before accepting an action that is so wrought in controversy and false information. Please base it on the science and the information from the biologists who track the deer populations instead of on the verbal desires of a few groups of people who are just trying to eliminate the competition. This action does not need to be a knee jerk reaction but must be well researched and thought out, looking at all aspects before coming to a determination such as the one you have already begun to accept.

Sincerely,

Jeffrey A. Hendrickson

1307 Fairy Chasm Rd.

Ketchikan, Alaska 99901

E-Mail: duffmeister007@gmail.com

Cell: 360-819-6772

Home: 907-225-6984

AK Subsistence, FW7 <subsistence@fws.gov>

[EXTERNAL] Request for reconsideration to the federal subsistence board. Unit 2 non-rural bag limit reduction.

Drew Mathews <drew0030@gmail.com> Mon, Apr 23, 2018 at 8:07 PM
To: subsistence@fws.gov

Andy Mathews
P.O. Box 8382
Ketchikan, AK 99901
907-821-1142
drew0030@gmail.com

Regulation: Change of unit 2 non-rural annual bag limit of deer on Federal lands from 4 bucks to 2 bucks. I have not seen a Federal Register publication yet.

This action directly impacts my family in that we typically need 4-7 deer a year to eat depending upon other hunting species harvested.

The Subsistence board has continually chipped away at our ability to hunt in Unit 2 and increased the ability for Rural hunters to harvested deer in unit 2.

This process began during a period of high deer numbers some years ago. First non-rural hunters were not able to hunt federal lands, on Prince of Wales Island, between August 1-15, with the exception of those lands south of Chomendely Sound and on those lands that drain into Clarence Straight. The surrounding Island, within unit 2, were not affected by this reduced season.

This action alone stopped us from hunting federal lands except those accessible only by boat or plane. This action was not completed due to a biological concern at the time. It was done to limit the hunting pressure so rural residents could get a chance to harvest deer before anyone else could. The rural season also grew by a week or so to start in July when the State of Alaska season began August 1. Rural residents were then allowed to harvest one doe per year and were given a 5th deer tag for federal lands. A doe tag and an extra tag are not indicators that there is a biological concern and like I said, this was done when deer numbers were high. Did I mention that a subsistence hunter can proxy hunt for others in their family or others. Basically deer hunting for Rural residents has no true limits. A family of five could have one hunter that shoots 25 deer in unit two. Fair enough, if they are going to eat them so be it. Non-rural do not have that ability. I was able to harvest 4 deer for my family or I could harvest a couple and the other family members could harvest some so we could meet our needs. Now we all know that not every member has the ability to harvest as many deer as they can eat. Kids are to small or are in school much of the season and that restriction cut 15 days of August hunting, the exact time when kids are out of school and could hunt. Now kids basically have a 8 day hunting season in unit 2 and a weekend here and there if the weather agrees with boat travel the rest of the year. Basically I have had to provide for my family by shooting 3-4 deer each year and my family members getting 1-2 a year. We only need about 2 deer per person, maybe less if we get some big ones and that is what we take 4-6 deer a year.

The next thing that occurred was Rural residents got an extended season into January. This increased the season to just over 6 months. Another action that indicates that deer population is not an issue.

So now the non-rural hunters will be limited to 2 deer on federal lands of unit 2. There were no exceptions. All of unit 2, even the little area on the Southeast side of POW and all of the islands. Now that is a big change. This was done again for the rural residents to more easily harvest their deer, or more correctly lest say it was to reduce competition for deer and create nearly a private hunting reserve. The USFS report and ADF&G both opposed this regulation change and had a long write up on why. One of the comments, among many was that they saw no need for a reduced bag limit. It showed that the historical average number of deer harvested per hunter was about 2 per year and about 2 days hunted per deer. Now harvesting 2 deer in 4 daysof hunting is a very good harvest rate when one is hunting any species of big game. It was even slightly better than that for rural hunters if memory serves. Basically the average hunter is able to and has been able to for many years, been able to harvest at this rate. Yes some people are better than the average hunter and some are worse.

So the deer limit is being lowered for non-rural only. If there was a true biological concern all user groups would be taking a deduction as on average non-rural hunters only harvest 2 deer per year from unit 2 (including those harvested from state lands) This action will have little to no impact on the number of deer harvested from unit 2. What it will do is change how non-rural hunters will have to hunt and where they can hunt. If there is a biological concern many other steps would have to occur correct a declining population. Those would have to include reversing some of the black bear hunting regulations that were put in place a few years ago (non-resident drawings) as bears eat a high number of fawns and some adult deer. Effectively manage wolf populations unit wide. Wolf numbers and hunting pressure varies widely across unit 2. Stable wolf populations, not to high and not to low, are better in the long run. Knee jerk changes to those regulations had created a quick upward trend in wolf populations island wide.

And the monster in the closet is rural deer harvests would have to decrease along with non-rural harvests. I have never seen a biologist that would suggest continuing doe harvests if deer populations were in severe decline. That is the first thing to go. It did not occur The next thing would be reduced hunting days. That did occur for Non-rural uses but the rural users have seen hunting days extended earlier and later. Does this suggest there is a biological concern? No! Next would be reduced bag limits. That is now occurring for non-rural. Oh but rural was given a 5th deer tag years ago and that remains. Next would be changes to proxy regulations to limit how many deer one person could harvest, as we all know some people are just better at it. That has not occurred.

I am not even going to delve deep into habitat concerns along the road system. Yikes what a mess. I am all for the timber industry but deer need old growth to survive harsh winters. 2nd growth is nearly void of deer when it gets to a certain age. Want to make a difference, good habitat solves many problems.

Basically this new regulation was not proposed due to a biological concern. Are there areas on the island that are down a bit in population, probably. Are all areas in Unit 2 down or in poor shape? Not a chance as hunting was as good as I have seen in years where I hunted unit 2. 2 hunters, 2 deer each in 2 days and we let over 20 bucks walk as we only need 2 each at the time.

I hear rural residents say it is getting harder to get there deer. Fact is last report I saw (2016) it was about the same as past years. They say to many young bucks are shot by non-rural hunters. If a deer is legal it is the hunters choice to harvest it or not. They say non-rural hunters are only trophy hunters. That is not the case. Hunters like big bucks because they have big steaks. This goes for rural and non-rural hunters. Small deer are tender and easy to pack. Deer along the road, easy deer, are hunted by some people both rural and non-rural. If it is legal to do so then shoot them if you so desire. The entire purpose of this regulation was not biological. It is to restrict non-rural hunters more and allow rural residents to have more.

The board I am sure listed to testimony and took a lot into consideration. What they failed to seriously take into consideration was the fact that the USFS biologist report and recommendation. This was not followed by even the USFS person on the board. The board did not follow the recommendations of ADF&G either. Not even one member voted against this proposal. The Supreme Court is not even that United.

If there is a biological concern lets deal with it at all levels, State and Federal. That is not being done as there is not a biological concern based upon the actions that have occurred . This is one user group asking for it all and getting it one small piece at a time and one group that will now have to depend on crappy meat from a store instead of healthy deer meat from a nice hard hunt that provides heart pumping exercise.

When ADF&G reduced bag limits in parts of 1A and season days in 1A there was a true concern. Nobody really complained. The issue in unit 2 is different. One group is taking a hard hit while the other group continues to receive more. This is wrong. It is wrong that I will have to pack a map every where I go not only for open areas August 1-15 but for areas that I can hunt after I harvest 2 deer as I still need the same amount of meat to feed my family, one way or the other, and for all hunters that strive to be totally legal that is going to be more difficult now.

My boy just asked what I was doing and I explained. He did not ask why, which is what I figured he would asked. He asked how are they going to be able to enforce that. Dang good question. Probably the same way they enforce the Aug. 1-15 closure, which is nearly unenforceable. Even the USFS LEO took a hunter out once and had him shoot a subsistence doe only to find that it was shot on state land and not legal. Oh and did I mention the USFS LEO that shot a wolf only to find out wolf was not open for non-subsistence users. That there should be enough to make regulators hesitate about confusing the regulatory issues in this unit.

This being said I know this letter does not follow the guidelines laid out in 36 CFR 242.20 and 50 CFR 100.20 as I don't have the Federal Register info and have not had a chance nor the time to do research to mount a legal defense for non-rural hunters nor should one have to fight to hunt in our great state within our great nation on public lands. As such my concerns will probably be disregarded again but I am not alone in this. Hunters should be together in using our resources and protecting them. ANILCA makes a lot of things legal to do but some things just are not right.

PS it took longer to write this than it did to find and pass up 2 three point bucks on opening day in unit two this year and shoot a nice buck shortly after that. And we went by boat and hunted on foot.

Respectfully,

Andy Mathews

AK Subsistence, FW7 <subsistence@fws.gov>

[EXTERNAL] Reconsideration for (2) deer hunting limit in unit two

3 messages

Bill M <will_haro@hotmail.com> Mon, Apr 23, 2018 at 11:06 AM
To: "subsistence@fws.gov" <subsistence@fws.gov>

My name is William Meck. I am a Ketchikan resident and have lived here since 1978. My family has been utilizing Prince of Wales Island to harvest deer since 1981. My family doesn't live in a mansions and we don't drive around in high dollar vehicles. I'm self employed and I work hard to survive the Alaska lifestyle. I feel that I am personally and directly being discriminated against because of my zip code. The ADF&G states that the islands deer population is on the rise and as anyone who spends time on this island knows the wolf population is out of control and has been mismanaged for a number of years from either or both a lack of people willing to participate in control or skewed numbers by private interest groups.
The people of unit one traveling to the island spend nearly a half a million dollars while over and that has a very high impact on the island in a positive way. I don't take vacations to extravagant places because that doesn't feed my wife, mother, daughter and grandson. Instead my hunting partner and myself save our money to go hunting for food. I generally try to take 3 deer per year by getting one on revillagigedo or gravina islands and then one or two on prince of Wales. That 120 pounds of meat goes a long way in my family. I don't hunt from a truck and last year I hiked almost 150 miles in 9 days. Prince of Wales affords me the ability to spread out away from other hunters whereas Ketchikan only having about 30 miles of road all together puts hunters in too tight of quarters to hunt black tail effectively and safely. With ground beef topping $9 per pound and no king salmon This season things are going to get very tight in the winter of 2018 for many families.

The worst case scenario is that you change your imposition that the first two tags in unit one would tag you out in unit two.
You might also want to ban hunting for doe's for a couple years by the locals if they are truly concerned about the deer population

Please take this letter into consideration to reverse the boards prior decision

William H Meck
1271 Millar st
Ketchikan, Alaska 99901
907-821-1460
Will_haro@hotmail.com

Appendix 2

§100.20 Request for reconsideration.

(a) Regulations in subparts C and D of this part published in the FEDERAL REGISTER are subject to requests for reconsideration.

(b) Any aggrieved person may file a request for reconsideration with the Board.

(c) To file a request for reconsideration, you must notify the Board in writing within sixty (60) days of the effective date or date of publication of the notice, whichever is earlier, for which reconsideration is requested.

(d) It is your responsibility to provide the Board with sufficient narrative evidence and argument to show why the action by the Board should be reconsidered. The Board will accept a request for reconsideration only if it is based upon information not previously considered by the Board, demonstrates that the existing information used by the Board is incorrect, or demonstrates that the Board's interpretation of information, applicable law, or regulation is in error or contrary to existing law. You must include the following information in your request for reconsideration:

(1) Your name, and mailing address;

(2) The action which you request be reconsidered and the date of FEDERAL REGISTER publication of that action;

(3) A detailed statement of how you are adversely affected by the action;

(4) A detailed statement of the facts of the dispute, the issues raised by the request, and specific references to any law, regulation, or policy that you believe to be violated and your reason for such allegation;

(5) A statement of how you would like the action changed.

(e) Upon receipt of a request for reconsideration, the Board shall transmit a copy of such request to any appropriate Regional Council and the Alaska Department of Fish and Game (ADFG) for review and recommendation. The Board shall consider any Regional Council and ADFG recommendations in making a final decision.

(f) If the request is justified, the Board shall implement a final decision on a request for reconsideration after compliance with 5 U.S.C. 551-559 (APA).

(g) If the request is denied, the decision of the Board represents the final administrative action.

Appendix 3

PREDATOR MANAGEMENT POLICY
FEDERAL SUBSISTENCE BOARD

Adopted by the Federal Subsistence Board on
May 20, 2004

The Federal Subsistence Board recognizes that predators are an important component of Alaska's dynamic ecosystems, beneficial to maintaining balance, health, and diversity within associated wildlife populations and habitats. Furthermore, the Board recognizes the traditional Alaska Native cultural beliefs and values associated with wolves, bears and other predatory species, and the impact that predators can have on ungulate populations valued by subsistence users. In addition, the Board recognizes that predator control may be an appropriate management tool on some Federal public lands for restoring prey populations to provide for subsistence needs where predation has reduced or held prey populations at levels significantly below historical levels of abundance.

As authorized by the Secretaries of Interior and Agriculture [50 CFR Part 100.10 (USDI) and 36 CFR Part 242.10 (USDA)], the Board administers the subsistence taking and uses of fish and wildlife on Federal public lands through regulations that provide for the non-wasteful harvest of fish and wildlife by Federally qualified rural residents, consistent with the maintenance of healthy populations of harvested resources. Such subsistence taking and uses are *"... for direct personal or family consumption ..."* (Section 803 of ANILCA). Wildlife management activities on Federal public lands other than the subsistence take and use of fish and wildlife, such as predator control and habitat management, are the responsibility of and remain within the authority of the individual land management agencies.

Accordingly, the Board will:

A. Consider all Federal proposals to regulated seasons and dates, methods and means, harvest limits, and customary & traditional use determinations for the subsistence take of fish and wildlife. The Board will ensure that the effect of its decisions is to provide for subsistence take and use of the subject species. The Board will also take into account approved population objectives; management plans, customary and traditional uses, and recognized principles of fish and wildlife management.

B. Direct the Office of Subsistence Management to provide proponents of predator control proposals (all Federal proposals that specifically indicate that the reason for the proposed regulation(s) is to reduce the predator population to benefit prey populations), with procedures for submitting the proposal to the appropriate agency. Where predators have been determined to be a major contributing factor in the significant reduction of ungulate populations important for subsistence use, or in the chronic suppression of such populations at low densities, the Board will endorse timely, affirmative and effective action consistent with each respective agency's policies and management objectives, to reduce predator populations and allow affected ungulate populations to recover. The Board will monitor actions taken by the agency to address such concerns, and will provide appropriate support where necessary to ensure the continuation of subsistence harvest opportunities.

C. Ensure that the appropriate Regional Council(s) is informed of predator control proposals by having them printed in the Proposal Booklet and presented to the Council at the next appropriate Council meeting, along with other rejected proposals that address concerns which are outside the authorities of the Federal Subsistence Board.