

INTERAGENCY STAFF COMMITTEE RECOMMENDATION

The Interagency Staff Committee recommendation is to **oppose** Temporary Special Action Request WSA19-03.

Justification

The quality of hunting opportunity for local Federally qualified subsistence users in Unit 13 has been greatly diminished because of non-local hunting competition along with unethical and illegal behaviors by some of the thousands of hunters who hunt there. As evidenced by the lengthy regulatory history in the OSM staff analysis, both the Alaska Board of Game and the Federal Subsistence Board have instituted numerous regulatory changes over time, consistent with their respective mandates, to provide for subsistence opportunities and uses in Unit 13 and also to address some of the same concerns raised by the proponent of this special action request.

A lack of sufficient enforcement during the hunting season has been commonly identified as an ongoing issue. If harvest were closed to all but Federally qualified subsistence users, non-Federally qualified users wishing to hunt on State lands adjacent to, or beyond Federal public lands would still have a significant presence on the road system and on trails bisecting these lands. A Federal closure does not prohibit non-Federally qualified users from accessing or camping on Federal public lands, or even shooting from Federal public lands onto State lands. The proponent, a resident of Unit 13, further recognized that this is not simply a rural/non-rural issue, but that Federally qualified subsistence users who reside outside of Unit 13 also contribute to the competition, safety issues, and lack of success experienced by local users. Reported unethical hunting activities, such as trespass or shooting from the road, are already illegal and would not be resolved by approving this request. However, a Federal closure limiting harvest opportunity to Federally qualified subsistence users only would create additional complex enforcement challenges requiring a determination of hunter eligibility and precise harvest locations to determine if a spatial violation may have occurred.

Public safety is a shared concern and not exclusive to local residents. It is not clear that a Federal closure would enhance the safety of the hunting public or simply reshuffle the implicit dangers associated with many people hunting along the road system.

The predominance of State managed lands in Unit 13, combined with the accessibility and location of Federally managed lands, preclude using a Federal closure to successfully address the concerns being brought forward by residents of Unit 13. The checkerboard, irregular pattern of Federal lands in Unit 13 does not lend itself well to game management considerations. The boundaries between Federal and State managed lands are not marked or easily described. Federal lands will not be easily identifiable without precise coordinates and navigation aids.

Moose and caribou hunts in Unit 13 are managed through a responsive permit and quota system using annual population indices to inform their management plans. As such, a closure of harvest on Federal lands to all but Federally qualified subsistence users is not presently needed for conservation purposes. For the 2019 hunting season, the State anticipates issuing 7,000 fewer caribou permits than were issued in 2018. The current regulatory regime recognizes that temporal separation of Federally qualified from non-Federally qualified users through a longer Federal season and more liberal harvest limits, is presently the

most workable approach to reducing some of the user conflicts in Unit 13 and providing for a subsistence priority.