

WP22-08 Executive Summary	
General Description	Wildlife Proposal WP22-08 requests that the Northeast Chichagof Controlled Use Area (NECCUA) annual deer harvest limit for non-Federally qualified users be reduced to two male deer. Submitted by: Southeast Alaska Subsistence Regional Advisory Council
Proposed Regulation	<p>Unit 4 - Deer</p> <p><i>Unit 4 — 6 deer; however, female deer may Aug. 1 - Jan. 31 be taken only from Sept. 15 – Jan. 31.</i></p> <p><i>Non-Federally qualified users are limited to 2 male deer in the Northeast Chichagof Controlled Use Area</i></p>
OSM Conclusion	Oppose
Southeast Alaska Subsistence Regional Advisory Council Recommendation	Support
Interagency Staff Committee Comments	The ISC acknowledges the discussion by the Council members that this proposal is not a complete closure but a reduction of non-Federally qualified use of resources in this area. This was one of four proposals for Unit 4, which overall has a healthy population of deer, but is experiencing subareas where subsistence users are not able to harvest enough deer for their needs. The Council submitted this proposal because of concerns brought to them by the affected Federally qualified subsistence users in Hoonah about not meeting subsistence needs for deer. The proposal review process allowed them to review the available data and hear testimony from all affected users of the resources. During the meeting, they acknowledged that the data in the State reporting system used to measure effort does not reflect success in subsistence hunting because subsistence hunting of deer is opportunistic and users generally only report when they are successful. They supported this proposal as a way that provided the least inconvenience to non-Federally qualified users while also reducing competition for the local subsistence users.
ADF&G Comments	Oppose
Written Public Comments	44 Oppose, 2 Neutral

STAFF ANALYSIS WP22-08

ISSUES

Wildlife Proposal WP22-08, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests that the Northeast Chichagof Controlled Use Area (NECCUA) annual deer harvest limit for non-Federally qualified users be reduced to two male deer.

DISCUSSION

The proponent states that it recently became more challenging for subsistence hunters in Hoonah to harvest sufficient deer to meet their subsistence needs due to increased hunting pressure from non-Federally qualified users. They state that regulatory change is needed to protect the deer population from further depletion and increase opportunity for Federally qualified subsistence users.

Existing Federal Regulation

Unit 4 - Deer

*Unit 4 — 6 deer; however, female deer may be taken only from Aug. 1 - Jan. 31
Sept. 15 – Jan. 31.*

Proposed Federal Regulation

Unit 4 - Deer

Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31. Aug. 1 - Jan. 31

***Non-Federally qualified users are limited to 2 male deer in the
Northeast Chichagof Controlled Use Area***

Existing State Regulation

Unit 4 - Deer

*Chichagof Island east of Port Frederick and north of
Tenakee Inlet*

<i>Residents and Nonresidents - 3 deer total</i>	<i>Bucks</i>	<i>HT</i>	<i>Aug. 1 - Sept. 14</i>
	<i>Any deer</i>	<i>HT</i>	<i>Sept. 15 - Dec. 31</i>

Unit 4 - Deer

Remainder

<i>Residents and Non-residents - 6 deer total</i>	<i>Bucks</i>	<i>HT</i>	<i>Aug. 1 - Sept. 14</i>
	<i>Any deer</i>	<i>HT</i>	<i>Sept. 15 – Dec. 31</i>

Extent of Federal Public Lands

Unit 4 is comprised of approximately 96% Federal Public Lands and consists of 95% U.S. Forest Service (USFS) managed lands and less than 1% National Park Service or U.S. Fish and Wildlife Service managed lands (Map 1).

Customary and Traditional Use Determination

Rural residents of Units 1, 2, 3, 4 and 5 have a customary and traditional use determination for deer in Unit 4.

Regulatory History

See Proposal WP22-07 analysis.

Biological Background

See Proposal WP22-07 analysis.

Habitat

See Proposal WP22-07 analysis.

Population Information

McCoy (2017) outlines the limitations of estimating deer populations, while Bethune (2020) discusses the most recent deer population status in Unit 4. Overall, the deer population in Unit 4 has recovered from the mortality incurred during the severe winters of 2006-2008 and is probably reaching winter carrying capacity in some areas. There have not been any significant mortality events recorded since 2008 and recent winters have been mild with no significant snowfall. McCoy (2019) explained that Unit 4 deer pellet-group counts in 2019 were higher than previous counts in all three survey areas. Pavlov Harbor, within the proposal analysis area (**Map 1**), was surveyed in 2019. Results indicate a 39% increase in pellet-groups from the last survey conducted in 2010 (McCoy 2010).

Annual harvest is one indication of deer population status. The average annual legal deer harvest in Unit 4 is 5,579 (**Figure 1**). Deer harvest was below average in 2007-2010, probably due to high deer mortality from several consecutive harsh winters. Unit 4 annual deer harvest has increased to pre-2007 levels, suggesting that the Unit 4 deer population has recovered from those harsh winters.

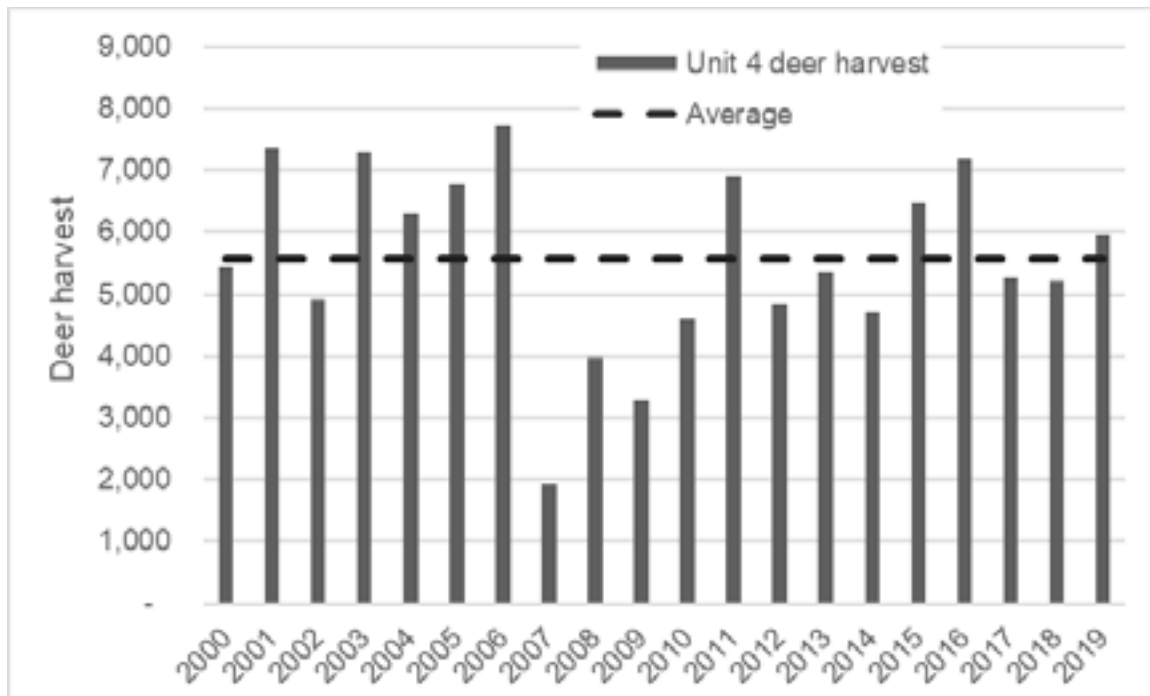


Figure 1. Unit 4 estimated annual legal deer harvest, 2000-2019.

Cultural Knowledge and Traditional Practices

Deer are an important subsistence resource for rural residents throughout southeast Alaska. In a 2012 survey of Hoonah residents, 59% of households reported attempting to harvest deer, 48% of households reported successfully harvesting deer, and 77% of households reported using deer (Sill and Koster 2017). An estimated 470 deer were harvested, for a total of 37,558 pounds, or 51 pounds per capita. The deer hunting areas documented in the survey were primarily northeast Chichagof Island east of Port Frederick and north of Tenakee Inlet (**Figure 2**). Sill and Koster (2017) also report that Hoonah respondents expressed concern about deer populations and harvests. Some respondents expressed concern that non-local hunters were taking too many deer and causing competition from over-crowding in the local areas and roads.

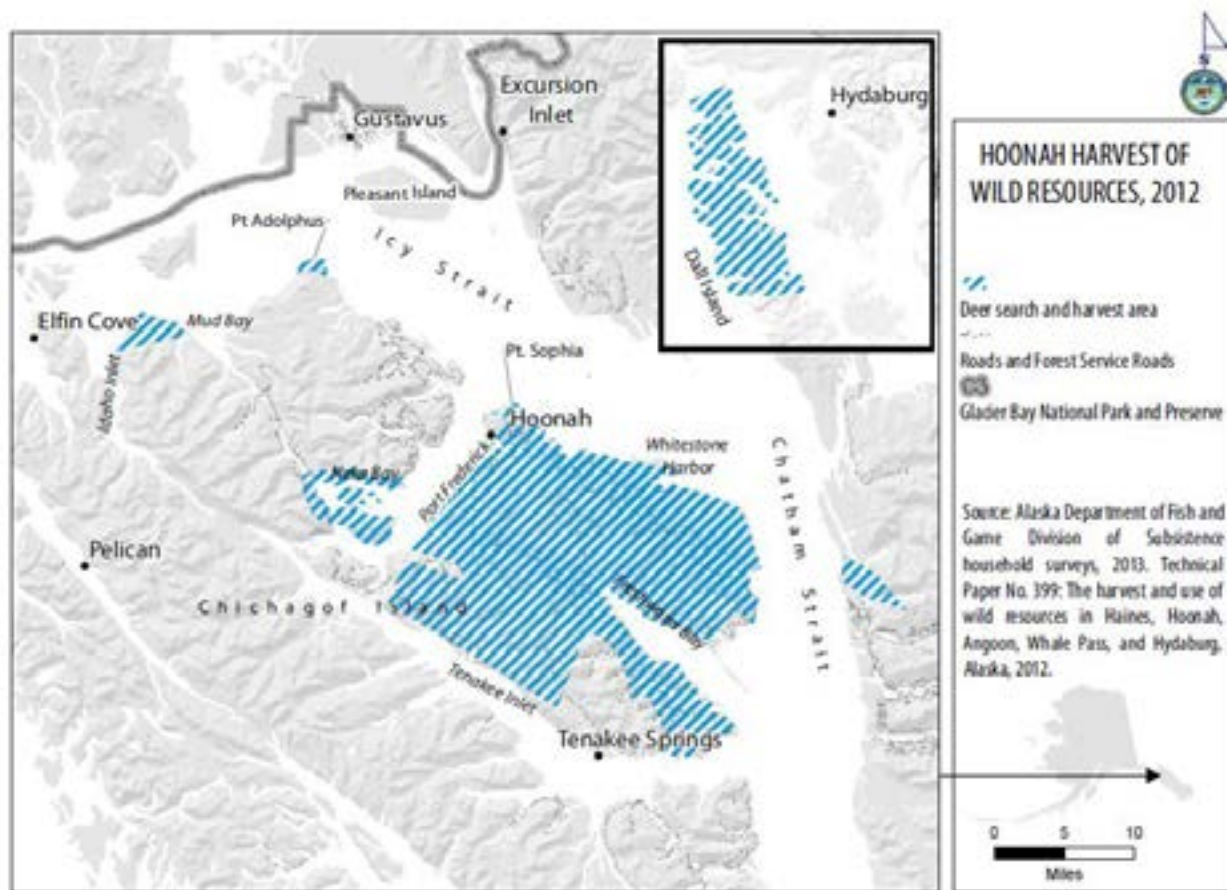


Figure 2. Reported deer hunting locations used by residents of Hoonah in 2012. From Sill and Koster 2017.

Hoonah and nearby communities maintain strong ties to Juneau as a commercial and economic hub, and many rural residents of the area move to Juneau for economic opportunities. Hoonah is the most populated place in the Hoonah-Angoon census area. The population has been stable since 2000 and was 782 in the 2019 census (Sill and Koster 2017; Alaska Department of Labor and Workforce Development 2020). Based on year-to-year changes in residency of Permanent Fund Dividend applicants, an average of 61 residents of the Hoonah-Angoon census area moved to Juneau each year between 2009 and 2020, while an average of 47 moved from Juneau to the Hoonah-Angoon census area (Alaska Department of Labor and Workforce Development 2021).

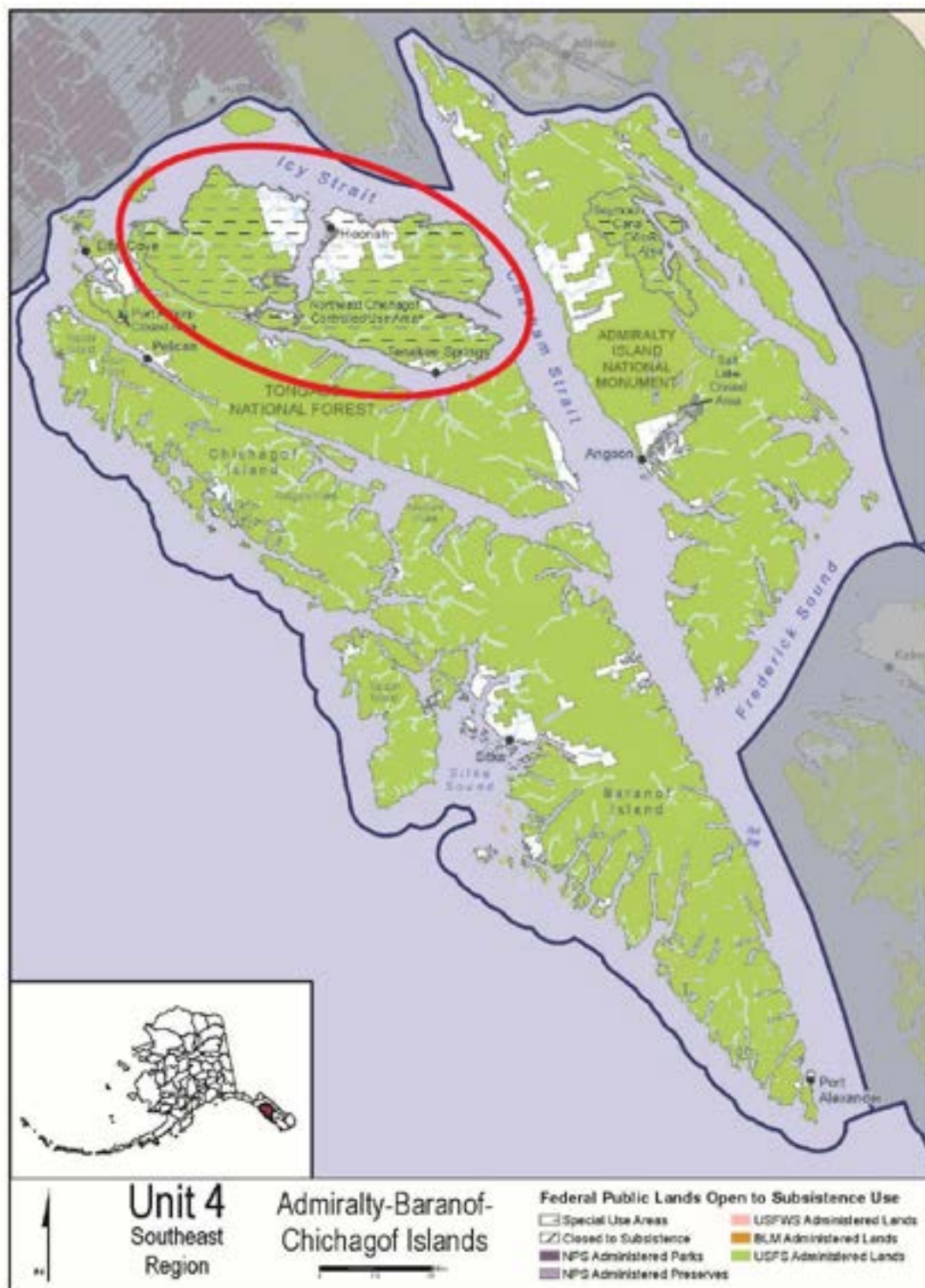
Harvest History

Through 2010, deer harvest data provided by the Alaska Department of Fish and Game (ADF&G) are based on a sample of hunters. In general, 35% of hunters from each community are surveyed each year and, while response rates vary by community, the overall response rate across communities is approximately 60%. Harvest numbers are extrapolated using expansion factors calculated as the total number of harvest tickets issued to a community divided by the total number of survey responses for that community. If response is low from a community, an individual hunter may have a disproportionate effect on the data. As confidence intervals are not available for these data, exact numbers should be considered estimates and used with caution. Trends, however, especially at larger scales, should be indicative of general population change. Since 2011, harvest data have been gathered through mandatory reporting.

ADF&G expands the harvest estimate based on the number of reports returned to account for unreturned harvest reports (Bethune 2020).

Deer harvest in Unit 4 in 2007/08 ($1,858 \pm 236$) was down significantly from 2006/07 ($7,746 \pm 594$) and was the lowest harvest in Unit 4 in over a decade due to significant mortality from preceding severe winters (McCoy et al. 2007). Prior to 2007/08, Unit 4 deer harvest was mostly stable, fluctuating around 7,000 deer. Harvest data indicates that the annual Unit 4 deer harvests increased beginning around 2008-2009 and was 5,969 in 2019 (**Figure 1**).

The proposal analysis area for WP22-08 relative to Unit 4 is shown in **Map 1**. The harvest data presented is specific to wildlife analysis areas (WAA) encompassing the area of northeast Chichagof Island north of Tenakee and Idaho Inlets, collectively called NECCUA (**Map 2**).



Map 1. Unit 4 management map with proposal analysis area (NECCUA) encircled in red.



Map 2. Wildlife analysis areas (NECCUA) used for harvest and effort data analysis.

Harvest and effort by Federally qualified subsistence users and non-Federally qualified users in the relevant WAAs is presented in **Figures 3 and 4** below. Federally qualified harvest is higher in most years compared to other users (**Figure 3**) while effort, expressed in hunter days, is generally lower (**Figure 4**). Non-Federally qualified users have a lower success rate which results in higher hunting effort compared to Federally qualified subsistence users. Between 2007 and 2019, Federal subsistence harvest increased to a high in 2016 before dropping slightly (**Figure 3**). Over the same period, effort in days hunted appears to be decreasing from a high in 2015, with Federally qualified subsistence user hunt days dropping the most. Eighty-two percent of non-Federally qualified users harvest 2 deer or less annually from Unit 4 (**Figure 5**). Female deer harvest by non-Federally qualified users has averaged 17% since 2000, with a peak of 33% in 2017 (**Figure 6**).

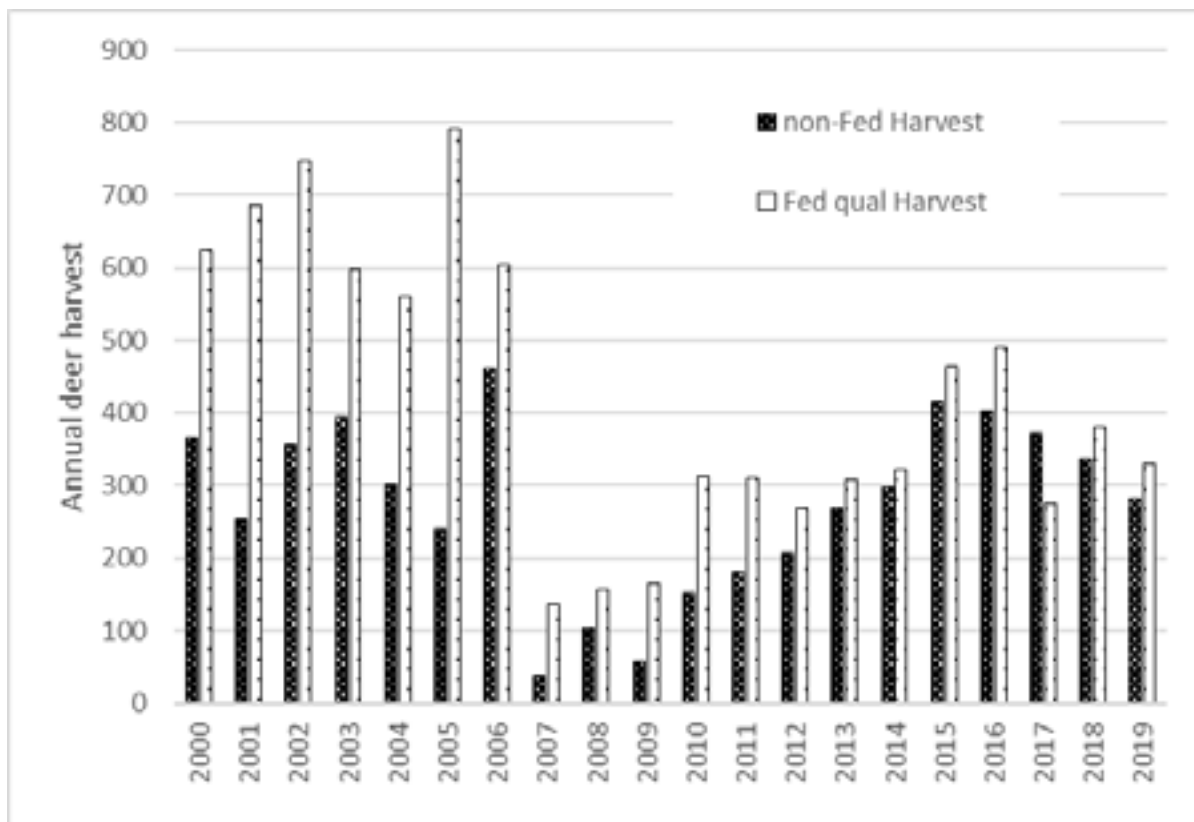


Figure 3. Annual deer harvest in the proposal analysis area, 2000-2019 (ADF&G unpublished data).

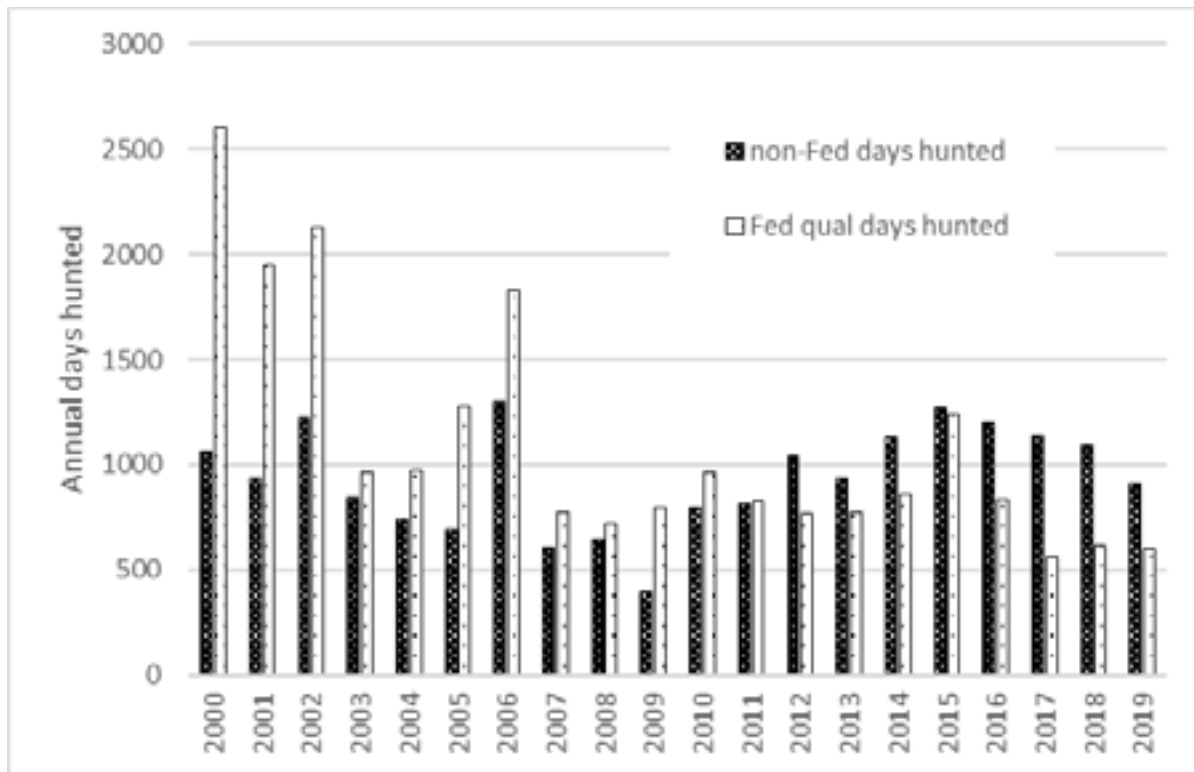


Figure 4. Annual effort, in hunter days, in the proposal analysis area, 2000-2019 (ADF&G unpublished data).

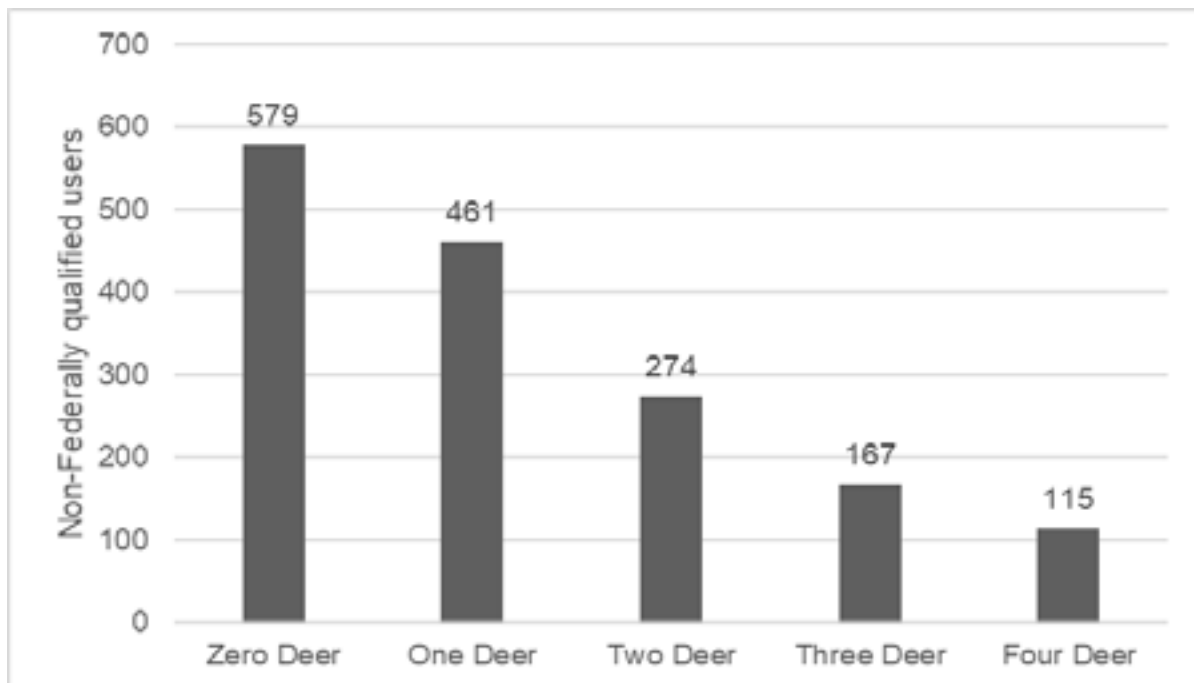


Figure 5. Average number of non-Federally qualified users harvesting 0-4 deer annually in Unit 4, 2000-2019 (ADF&G unpublished data).

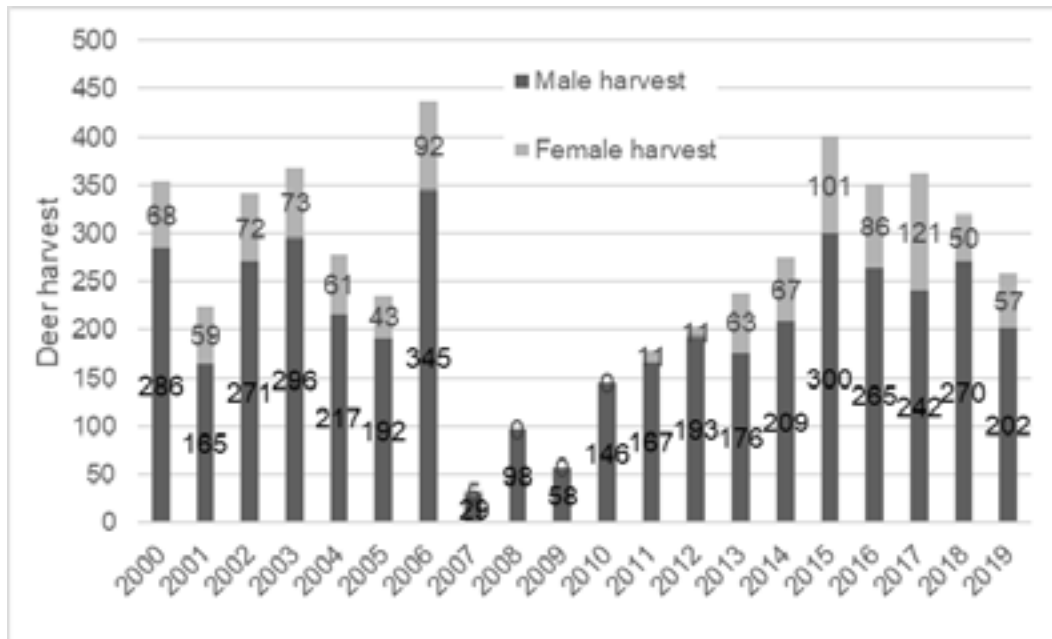


Figure 6. Number of male and female deer harvested by non-federally qualified users in NECCUA, 2000-2019. Female deer harvest was restricted 2007-2012. (ADF&G unpublished data).

The chronology of deer hunting effort in all of Unit 4 is probably similar to effort in the proposal analysis area, varying by user group. November is the most popular hunting month for both groups, particularly for non-Federally qualified users (Figure 7).

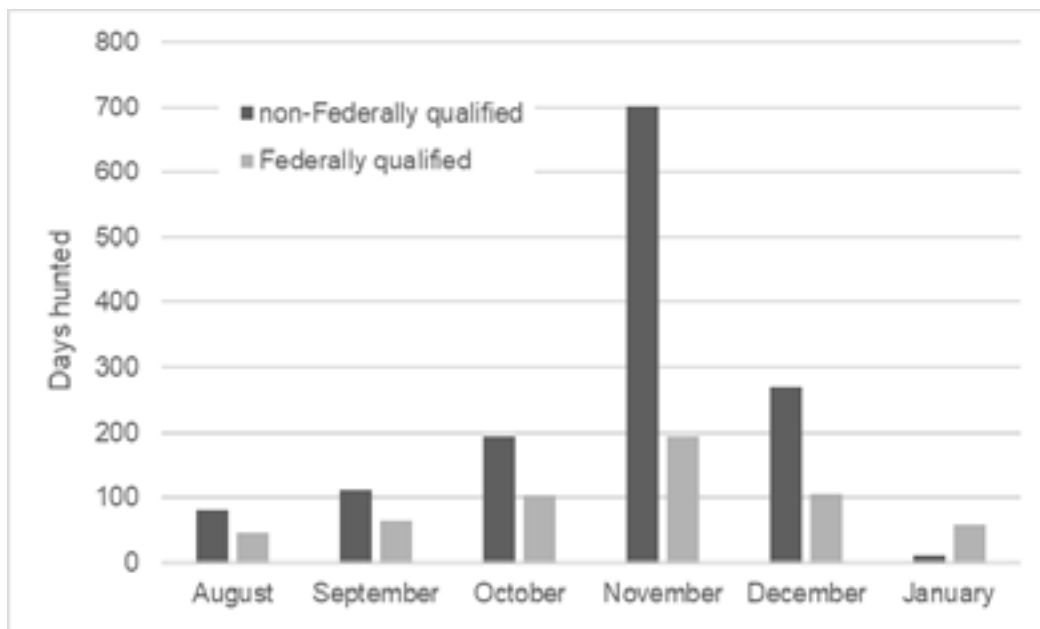


Figure 7. Average number of days hunted annually by Federally qualified subsistence users and non-Federally qualified users in Unit 4, 2000-2019 (ADF&G unpublished data).

Hunter success rate and the number of deer harvested per hunter, are indicators of whether user nutritional needs are being satisfied. For data management purposes, a hunt is considered successful when any num-

ber of animals is harvested on a single hunt. The success rate for residents of Hoonah and the number of deer per hunter has been trending up since 2009 (**Figure 8**).

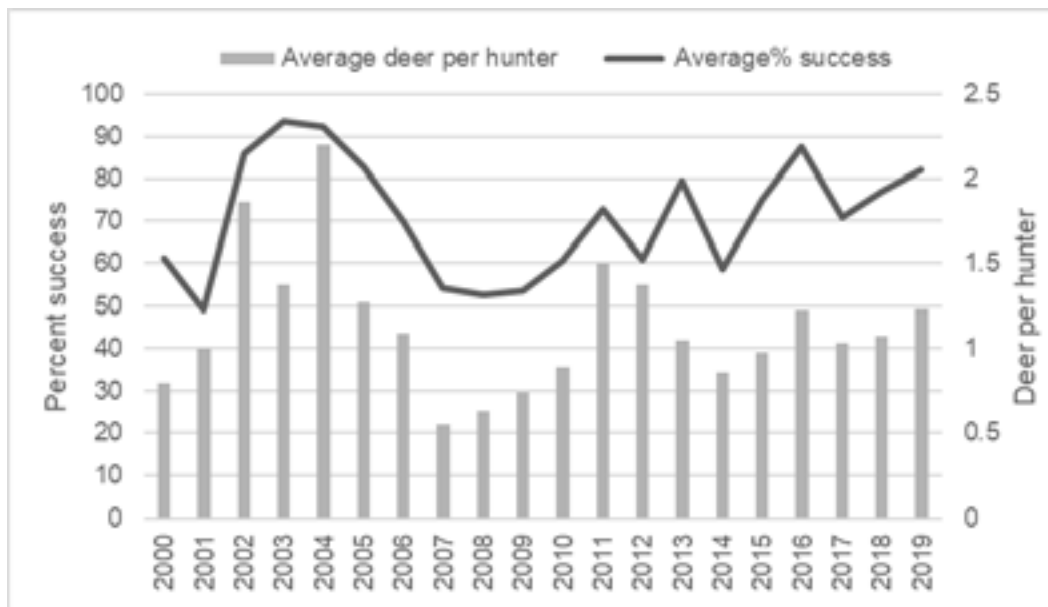


Figure 8. Hunter success rate and deer harvested per hunter for Hoonah residents hunting in Unit 4, 2000-2019 (ADF&G unpublished data).

Effects of the Proposal

This proposal would restrict non-Federally qualified users on Federal public lands within the NECCUA by limiting harvest to two male deer. Restricting non-Federally qualified users could decrease both deer harvest and competition with Federally qualified subsistence users in the area. Lower harvests by and competition with non-Federally qualified users may result in more deer harvested by Federally qualified subsistence users. Non-Federally qualified users may shift some effort to areas of Unit 4 outside of NECCUA, possibly displacing hunters in other areas. Non-Federally qualified users may also concentrate more efforts on the State managed lands within the NECCUA, including lands immediately surrounding Hoonah. However, considering that very few non-Federally qualified users harvest more than two deer in Unit 4, and most of the deer harvested within the analysis area are males, this restriction would probably have little impact on the hunting effort, location, or harvest of non-Federally qualified users within the analysis area.

OSM CONCLUSION

Oppose Proposal WP22-08.

Justification

Section 802(2) of ANILCA requires that subsistence uses by rural residents of Alaska shall be “the priority consumptive uses of all such resources on the public lands of Alaska.” Section 804 provides a preference for subsistence uses, specifically “...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.” Section 815(3) provides that the Board may restrict nonsubsistence uses on Federal public lands if “necessary for the conservation of healthy populations of fish and wildlife, for the reasons set forth in section 816, to continue subsistence uses of such populations, or pursuant to other applicable law.”

Restricting non-Federally qualified users to two male deer annually in the proposal area does not appear necessary because deer populations in Unit 4 are high and may be approaching carrying capacity in some locations.

Restricting non-Federally qualified users to two male deer annually in the proposal area does not appear necessary for the continuation of subsistence uses. The average annual success rate for Hoonah deer hunters has been increasing since 2008 and the deer harvested per hunter had rebounded to pre-2007 levels. Further, few non-Federally qualified users harvest more than 2 deer in Unit 4 and they harvest primarily males in the analysis area; therefore, the proposed restriction is not likely to significantly affect effort by non-Federally qualified users or the hunting experience of Federally qualified subsistence users.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Southeast Alaska Subsistence Regional Advisory Council

Support WP22-08. The restriction is necessary for the continuation of subsistence uses based on public and written testimony from residents and is supported by local and traditional knowledge. This proposal benefits Federally qualified subsistence users because it 1) reduces the harvest limit and restricts the harvest to bucks only for non-Federally qualified users, which reserves does for Federally qualified subsistence users, 2) provides additional harvest opportunities, and 3) may help limit hunting competition around Hoonah during the hunting season. Limiting non-Federally qualified users to two bucks would not be an inconvenience as these users rarely take more than 2 deer.

INTERAGENCY STAFF COMMITTEE COMMENTS

The ISC acknowledges the discussion by the Council members that this proposal is not a complete closure but a reduction of non-Federally qualified use of resources in this area. This was one of four proposals for Unit 4, which overall has a healthy population of deer, but is experiencing subareas where subsistence users are not able to harvest enough deer for their needs. The Council submitted this proposal because of concerns brought to them by the affected Federally qualified subsistence users in Hoonah about not meeting subsistence needs for deer. The proposal review process allowed them to review the available data and hear testimony from all affected users of the resources. During the meeting, they acknowledged that the data in the State reporting system used to measure effort does not reflect success in subsistence hunting because subsistence hunting of deer is opportunistic and users generally only report when they are successful. They supported this proposal as a way that provided the least inconvenience to non-Federally qualified users while also reducing competition for the local subsistence users.

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

Wildlife Proposal 22-08

This proposal would reduce the bag limit for non-federally qualified users (NFQU) to 2 bucks within the Northeast Chichagof Controlled Use Area (NECCUA, Figure 1).



Figure 1. Map of the NECCUA proposal and boundaries of the ADF&G WAAs for deer hunter data used to analyze effects of the proposal.

Background

The Southeast Alaska Subsistence Regional Advisory Council (SERAC) claims that NFQUs are unfairly competing with federally qualified users (FQU) when hunting Sitka black-tailed deer. Currently within the NECCUA, NFQUs have a bag limit of 3 deer east of Port Frederick and 6 deer west of Port Frederick (bucks only August 1 – September 14). This proposal does not affect the current FQU bag limit for deer within the NECCUA (6 deer).

GMU 4 encompasses the ABC Islands (Admiralty, Baranof and Chichagof) and the surrounding archipelago. Hunters residing in Southeast Alaska (GMUs 1-5) excluding Juneau and Ketchikan are eligible to harvest deer in GMU 4 under federal subsistence regulations. The current federal deer season for this area is August 1 to January 31 with a bag limit of 6 deer (bucks only August 1 – September 14). The current State season is August 1 to December 31 with a bag limit of 6 deer (bucks only August 1 – September 14) west of Port Frederick and 3 deer east of Port Frederick. In 2019, the Alaska Board of Game (BOG) increased the deer bag limit in GMU 4 from 4 to 6 deer (except the NECCUA east of Port Frederick which remained 3 deer) because there is such a healthy deer population within this GMU.

Under State regulations the NECCUA east of Port Frederick and north of Tenakee Inlet is treated separately from the remainder of GMU 4 with a more conservative bag limit. This area has been

extensively logged and features a network of logging roads that facilitate access for hunting. It is also prone to heavy snow and much of the deer winter range has been altered by clearcut logging.

The BOG has made positive customary and traditional use findings for deer in GMU 4 and established an annual amount reasonably necessary for subsistence (ANS) for deer in GMU 4 of 5,200–6,000 deer. ANS differs from the undefined term “subsistence need” used in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Under Alaska law ANS is the harvestable portion of a game population that is sufficient to provide a reasonable opportunity for subsistence uses. “Reasonable opportunity” is that which allows a normally diligent hunter a reasonable expectation of success. The BOG establishes an ANS for a game population through review of long-term population and harvest information. A portion of the state-designated Juneau Nonsubsistence Area extends into GMU 4 on northern and eastern Admiralty Island.

The indices of deer abundance, deer hunter effort and harvest in GMU 4 and withing the NECCUA are all important aspects to consider when reviewing this proposal. Deer abundance and trend are derived from annual deer pellet group transects, aerial alpine surveys, and spring mortality surveys. Hunter effort and harvest data are derived from the annual deer hunter survey (1997-2010) and mandatory deer harvest ticket reports (2011 - present). Collectively, these data gathered by the Alaska Department of Fish and Game (ADF&G) are the only annually collected, objective, and quantitative information on deer abundance, hunter effort and harvest available for Southeast Alaska.

GMU 4-Wide Population and Harvest

Monitoring deer abundance in forested habitat is challenging as deer cannot be directly counted through ground or aerial surveys. We present several types of survey data. Since the 1980s ADF&G has used spring pellet group counts to monitor broad (>30%) changes in deer abundance. Spring pellet group surveys are conducted in numerous US Forest Service Value Comparison Units across Southeast Alaska after snow melts and before spring green-up.

GMU 4 consistently has the highest pellet group counts in Southeast Alaska (Figure 2). Pellet group counts <1.0 groups/plot generally correspond to low density populations, 1.0 – 1.99 groups/plot to moderately dense populations and > 2.0 groups/plot correspond to high density populations. Pellet group counts in GMU 4 are usually well above the high-density threshold and are often double the counts in other GMUs. Although the area affected by this proposal is rarely sampled, this broad index of deer abundance suggests the GMU 4 population remains at high levels with no indication of depleted populations or conservation concerns.

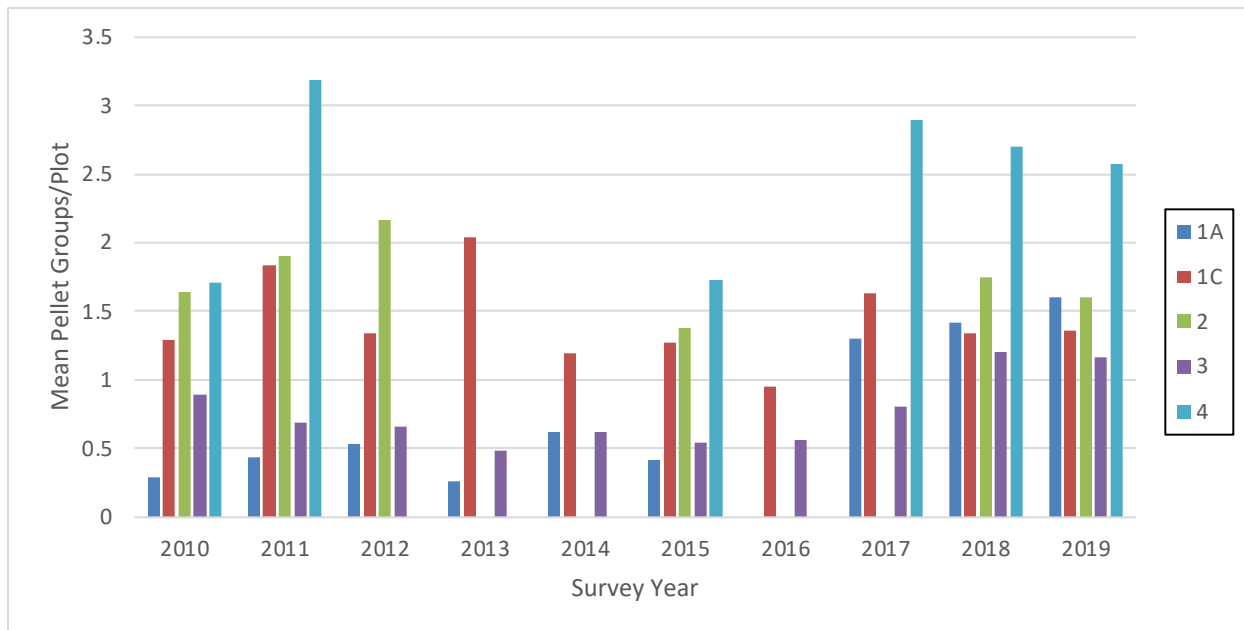


Figure 2. Mean number of deer pellet groups/plot for Southeast Alaska by GMU, 2010-2019.

In 2013 ADF&G began evaluating mid-summer aerial counts of deer in alpine habitat as an index of deer abundance. Surveys were conducted for 2 locations in GMU 4, Southern Admiralty Island (2015-2017) and Northeast Chichagof Island (2017-2018). The findings of those surveys were summarized as deer counted per hour of survey time (Figure 3). Southern Admiralty had the highest deer/hour of any survey area in Southeast Alaska. Estimates from Northeast Chichagof were similar to Prince of Wales Island (POW) and higher than all other survey areas except Southern Admiralty and POW.

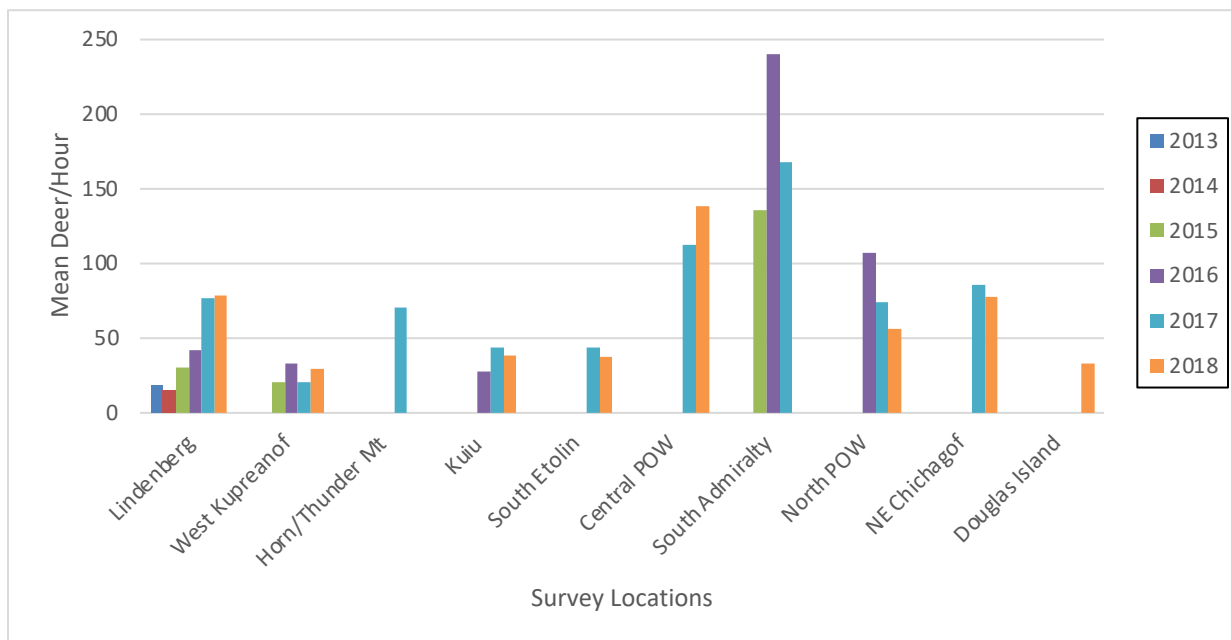


Figure 3. Mean number of deer counted per hour during mid-summer aerial alpine deer surveys in Southeast Alaska, 2013-2018.

Management biologists in GMU 4 began conducting beach mortality transects in the early 1990s. Although these mortality surveys are a relatively insensitive indicator of population trend, they are an indicator of mortality resulting from severe winters, which is the most limiting factor for Sitka black-tailed deer populations in GMU 4. In addition to the total count of carcasses per mile, the proportion of adult male, adult female and fawn mortalities also indicates winter severity. Usually fawns die first, followed by adult males and then adult females. The winter of 2006/2007 was the most severe on record, and in some parts of GMU 4 managers estimated up to 75% of deer died. Note the very high number of carcasses found during spring 2007 surveys (Figure 4). In the years since then, few carcasses were found indicating high overwinter survival and no winter related population declines.

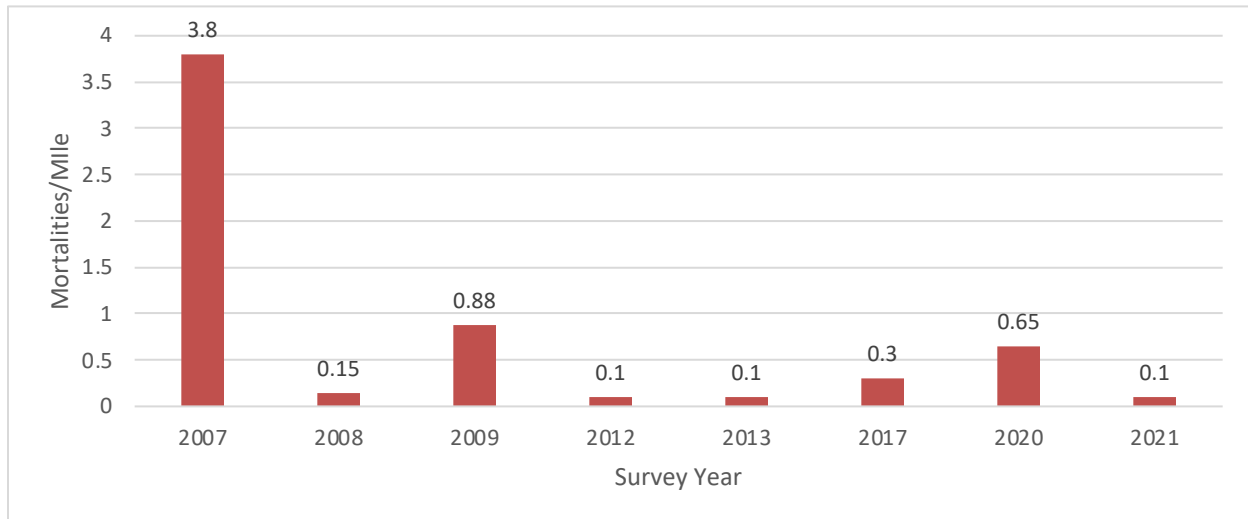


Figure 4. Mortalities per mile of beach transect conducted in GMU 4.

Taken together, these indices of deer abundance (pellet group surveys, alpine counts, mortality transects) suggest the GMU 4 deer population is high and stable. None of these indices suggests a decline in deer abundance or a conservation concern for the GMU 4 deer population.

Hunter Effort and Harvest

GMU 4 managers also use harvest as an indicator of trend in the deer population. ADF&G estimates hunter effort and harvest using information provided by hunters. To hunt deer in Southeast Alaska all hunters must obtain harvest tickets. Prior to 2011 ADF&G mailed survey forms to one third of the hunters in each community who obtained harvest tickets. Since 2011 harvest tickets have come with a mandatory reporting requirement. People who obtain harvest tickets are required to report whether they (or a proxy or federal designated hunter) hunted or not. Those who did hunt are required to report where they hunted, days of hunting effort, and information about deer they harvested.

Since 1997 the estimated average annual harvest in GMU 4 has been 5,643 deer taken by 3,275 hunters (**Figure 5**). GMU 4 supports the highest deer harvest in the state. Harvest has remained fairly stable with between 5,000-7,000 deer harvested annually. The exception being the severe winter of 2006/2007 when high harvest was followed by significant overwinter mortality of deer in GMU 4. This resulted in a precipitous decline in harvest from 7,734 deer in 2006 to 1,933 deer in 2007. Based on harvest and other indicators of deer abundance, managers believe the deer population had fully recovered by the 2013 season.

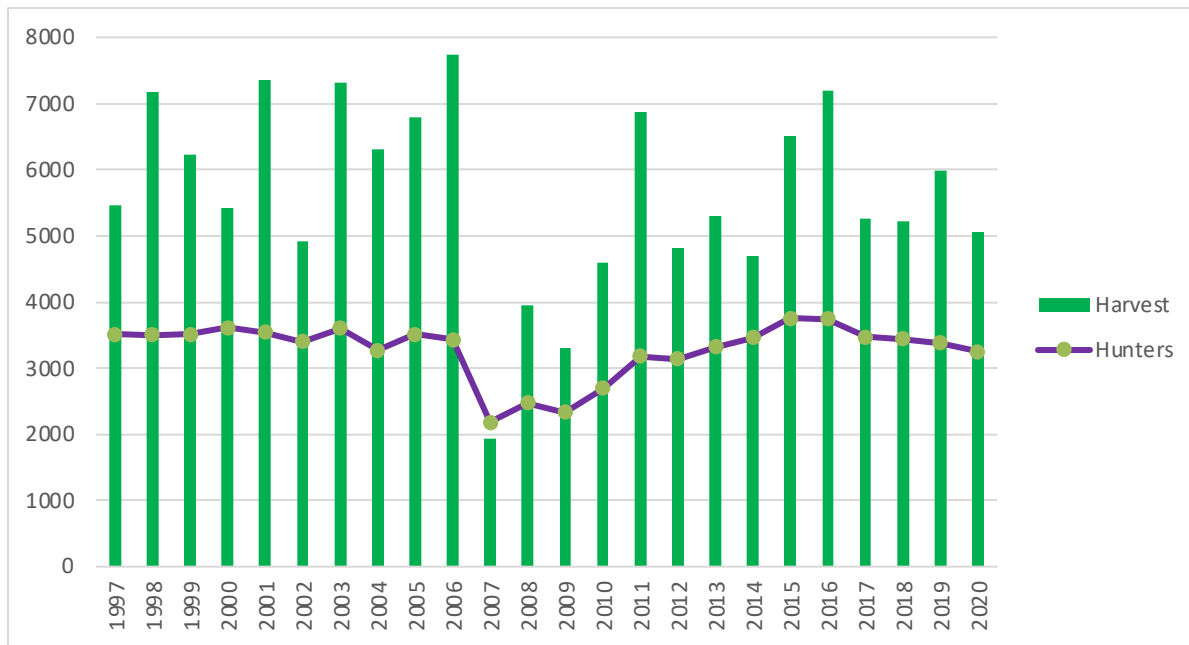


Figure 5. Numbers of people hunting deer and estimated deer harvest for GMU 4, RY97-RY20.

Data Summaries for Impacted Area

The following analyses present data summarized for FQUs and NFQUs in the 8 ADF&G Wildlife Analysis Areas (WAAs 3523-3526, 3551, 4222, 4252 and 4253) that intersect with the area this proposal covers (**Figure 1**). WAA boundaries generally correspond with watersheds and are the finest scale at which data can be meaningfully summarized. For this proposal, WAA boundaries directly correspond to the proposal area.

Long-term records indicate a declining trend in harvest for FQUs and a stable trend for NFQUs (Figure 6). From 1997 to 2006, FQUs harvested an average of 747 deer annually. Harvest by FQUs declined following the severe winter of 2006/2007. Since 2013, when ADF&G considered the deer population recovered, average annual harvest by FQUs grew to an average of 401 deer annually but remains about 50% lower than prior to RY07. Harvest by NFQUs also declined following the winter of 2006/2007 but has returned to approximately 90% of pre-2007 levels (**Figure 6**).

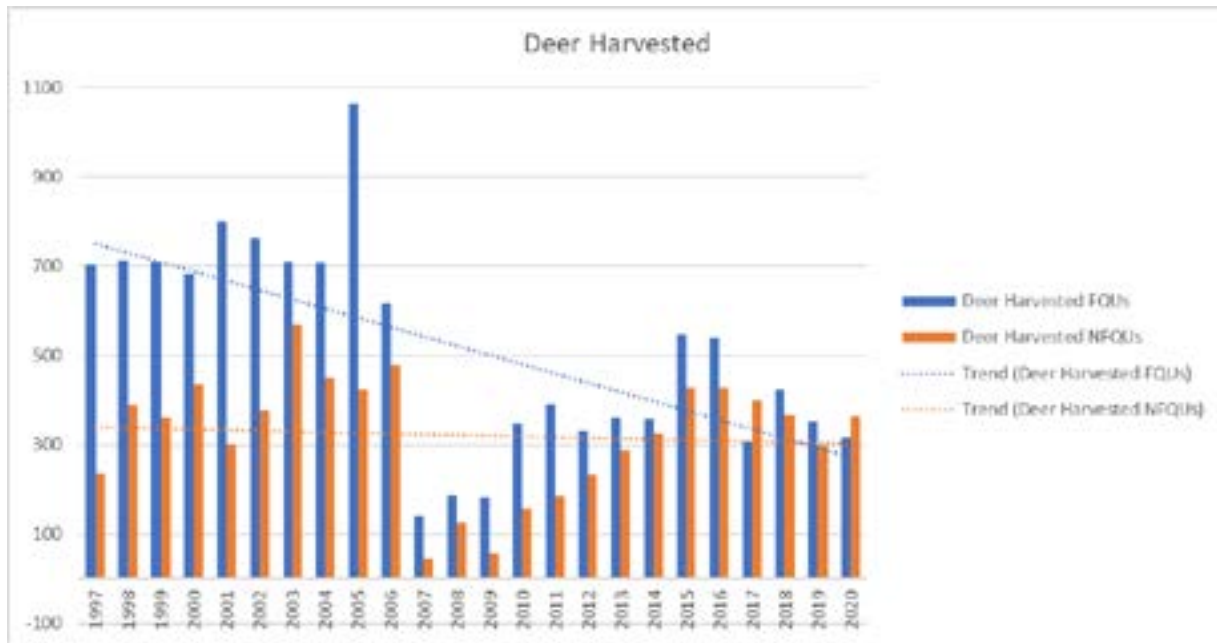


Figure 6. Trends of estimated deer harvest by FQUs and NFQUs, NECCUA, RY97-RY20.

To evaluate potential reasons for the decline in deer harvest by FQUs we examined trends in the numbers of FQU and NFQU hunters and days of hunting effort by those hunters. The number of FQUs hunting in the NECCUA has declined approximately 50% since the late 1990s. Prior to the winter of 2006/2007 an average of 333 FQUs took to the field. The number of FQUs participating in this hunt never fully recovered and since 2013 has only averaged 239 hunters. The number of NFQUs hunting in the NECCUA also declined after the winter of 2006/2007 but returned to pre-2006 levels by 2012 (**Figure 7**).

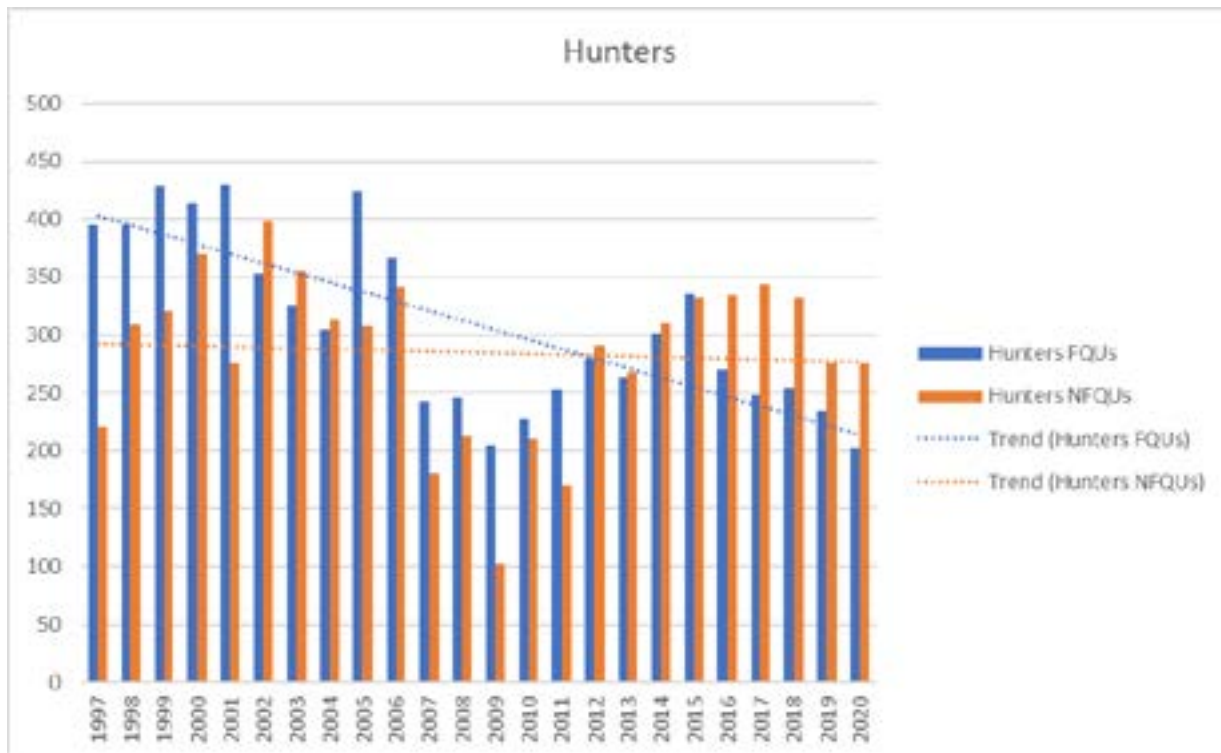


Figure 7. Trends in number of FQUs and NFQUs, NECCUA, RY97-RY20.

In Hoonah specifically, there has been an approximate 10% declining trend in the number of Hoonah residents who have obtained deer harvest tickets (Figure 8).

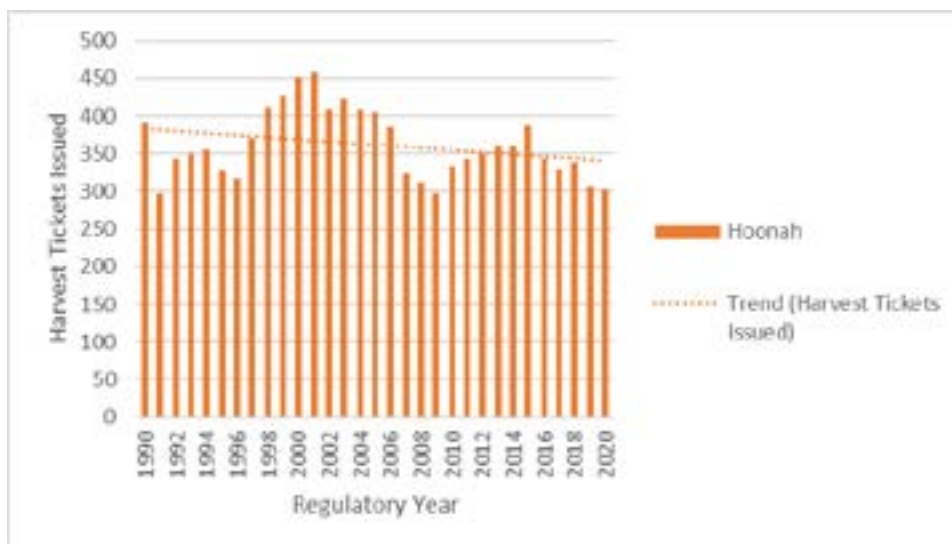


Figure 8. Deer harvest tickets issued to Hoonah residents RY97-RY20.

Trends in days hunted approximate the trends for number of hunters for both user groups. Since 1997 the number of days of hunting effort by FQUs has declined by over 50% while days of hunting effort by NFQUs has remained stable (Figure 9). Similar to the number of hunters, days of hunting effort by FQUs never recovered from the steep decline following the winter of 2006/2007. The number of hunters along

with the number of days hunted both indicate decreased deer hunting effort for this area of GMU 4 by FQU hunters.

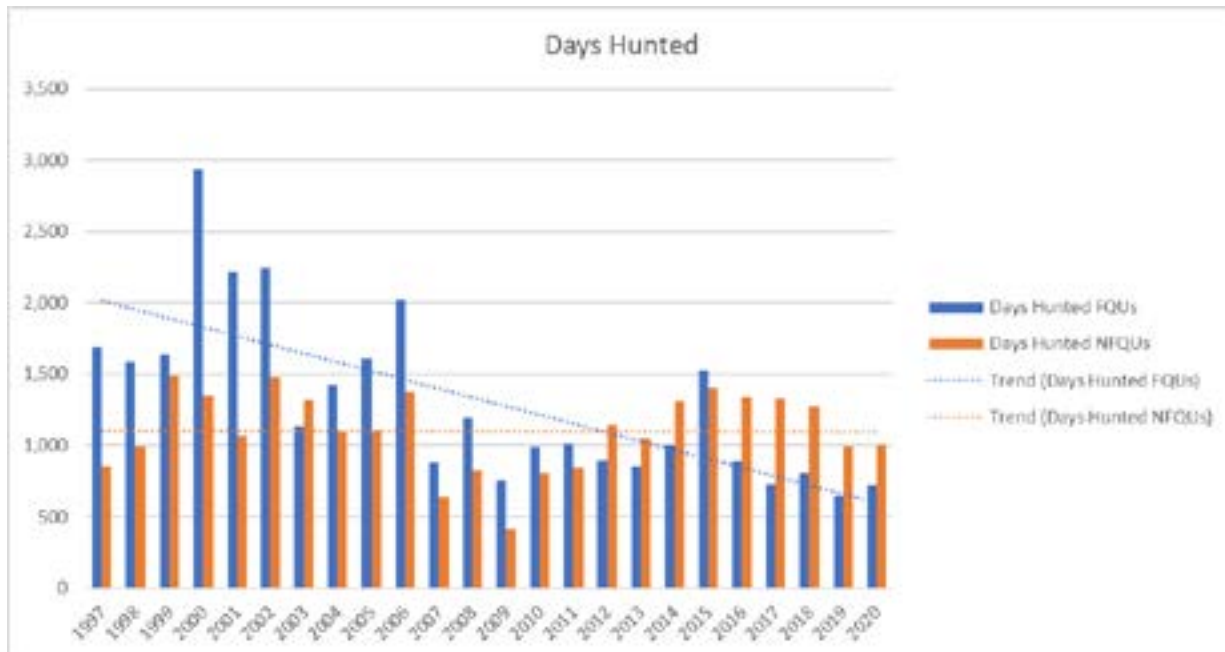


Figure 9. Trends in estimated days of hunting effort by FQUs and NFQUs, NECCUA, RY97-RY20.

Trends in Hunter Efficiency

Hunter efficiency, or the days of hunting effort required to harvest 1 deer, is another indicator of deer availability to GMU 4 hunters. FQUs in the NECCUA are consistently more efficient than NFQUs (Figure 10). Since 2013, NFQUs required an average of 3.4 days to harvest 1 deer, but FQUs required only 2.2 days to harvest one deer. This metric is trending slightly down for FQUs (becoming more efficient) and has been below 2.0 days/deer for 3 of the past 5 seasons.

Compared to deer hunting effort required to harvest a deer elsewhere in the state, this is an extremely efficient hunt. Hunters in GMU 4 require approximately 2.4 days/deer. In comparison, hunters on Prince of Wales Island (GMU 2) average 4.0 days of hunting per deer harvested, Kodiak (GMU 8) averages 3.6 days/deer, GMU 1A (Ketchikan) averages 5.0 days/deer, GMU 3 (Petersburg/Wrangell) averages 6.1 days/deer, GMU 6 (Prince William Sound) averages 3.0 days/deer, and in GMU 1C (Juneau) hunters average 7.9 days/deer (ADF&G 2013-2020). Hunters in GMU 4 experience the most efficient deer hunting of anywhere in Alaska. FQU hunters in the NECCUA have a better days/deer average than Unit 4 as a whole.

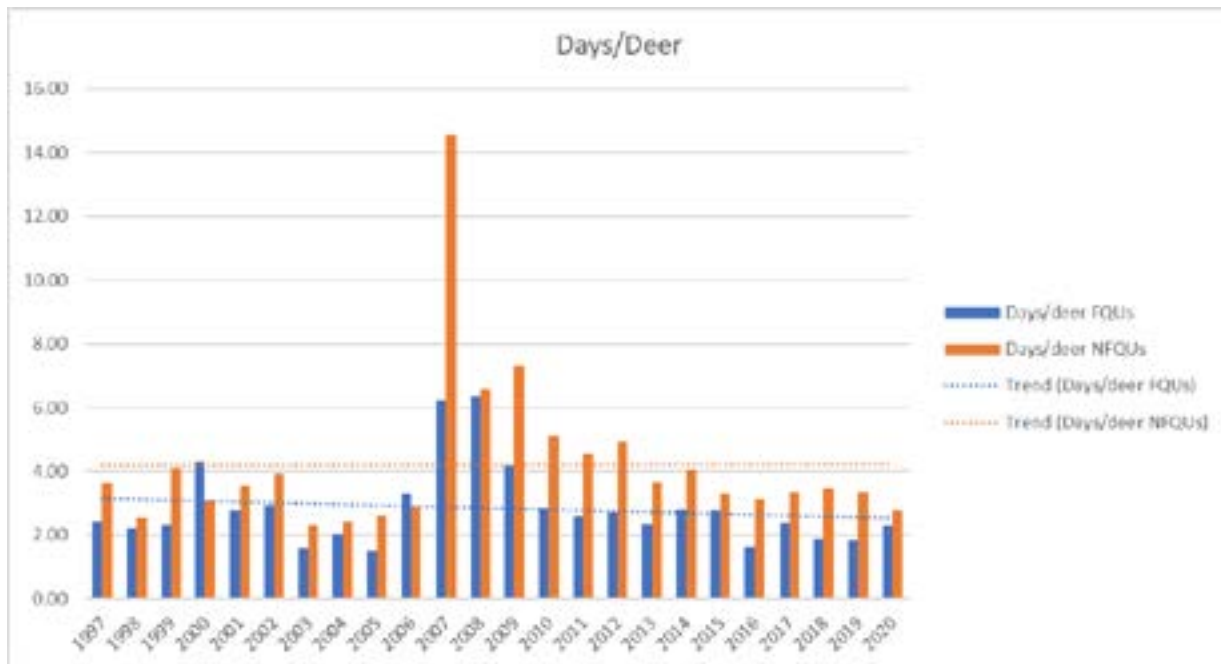


Figure 10. Trends in estimated days of hunting effort by FQUs and NFQUs required to harvest 1 deer, NECCUA, RY97-RY20.

The number of deer harvested per hunter is another gauge of deer abundance and hunting success. Since 1997 the number of deer harvested per NFQU has averaged 1.2. FQUs report harvesting about 1.9 deer/hunter. Prior to the winter of 2006/2007 FQU hunters averaged 2.2 deer/hunter. Since RY13, FQU hunters are only harvesting 1.7 deer/hunter. NFQU deer/hunter numbers have generally returned to pre-RY07 levels. Although the deer/hunter numbers for FQU hunters is trending down, this is more a function of fewer hunters spending less days afield than it is an indicator of hunting efficiency. Particularly in light of days/deer and that NFQU harvests have nearly reached pre-RY07 levels. (**Figure 11**).

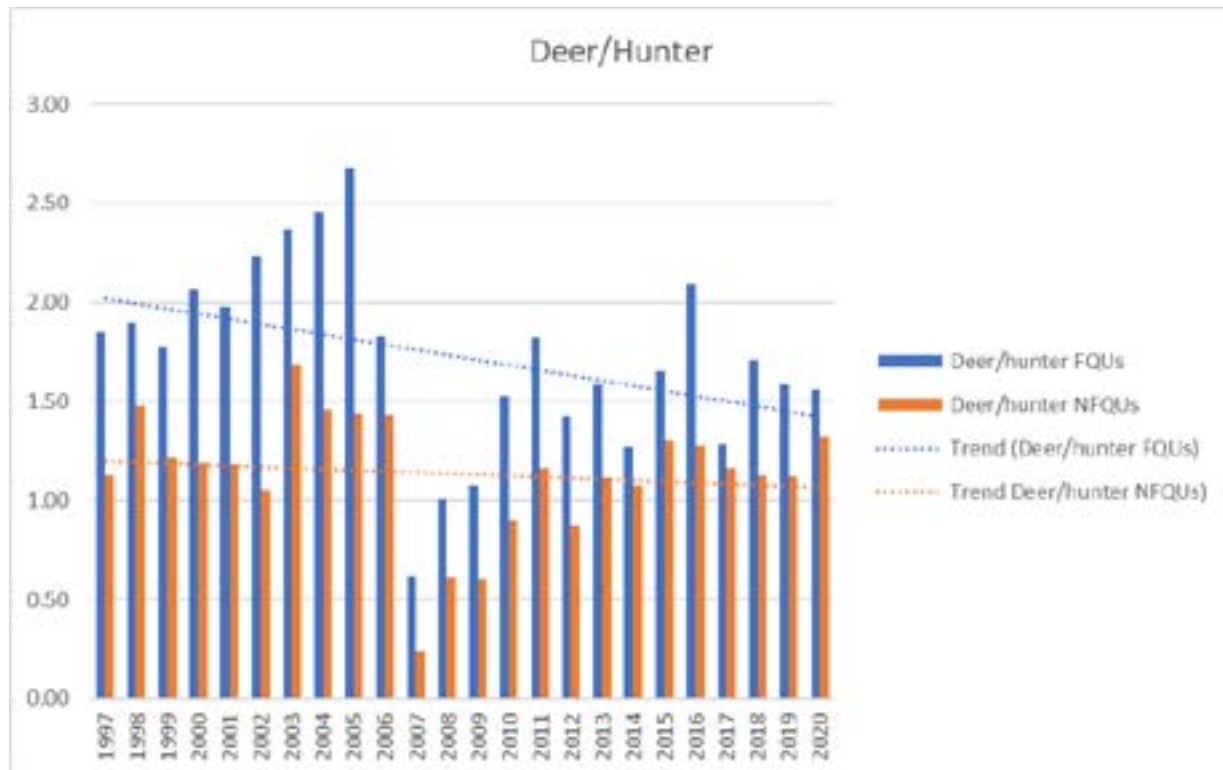


Figure 11. Trends in mean number of deer harvested per FQU and NFQU, NECCUA, RY97-RY20.

Within the NECCUA, the bag limit for NFQUs is 6 deer west of Port Frederick and 3 deer east of Port Frederick. This proposal seeks to reduce that bag limit to 2 bucks for the entire NECCUA. ADF&G collects data on the number of deer individual hunters report taking relative to the bag limit in areas they report hunting. Within GMU 4, 83.5% of NFQUs take 2 or fewer deer (Figure 12, ADF&G RY19-RY20). Eight and a half percent of NFQUs take 3 deer and 5% take 4 deer. The percentage of hunters who took 5 or 6 deer (legal as of RY19) was 1.5% for each.

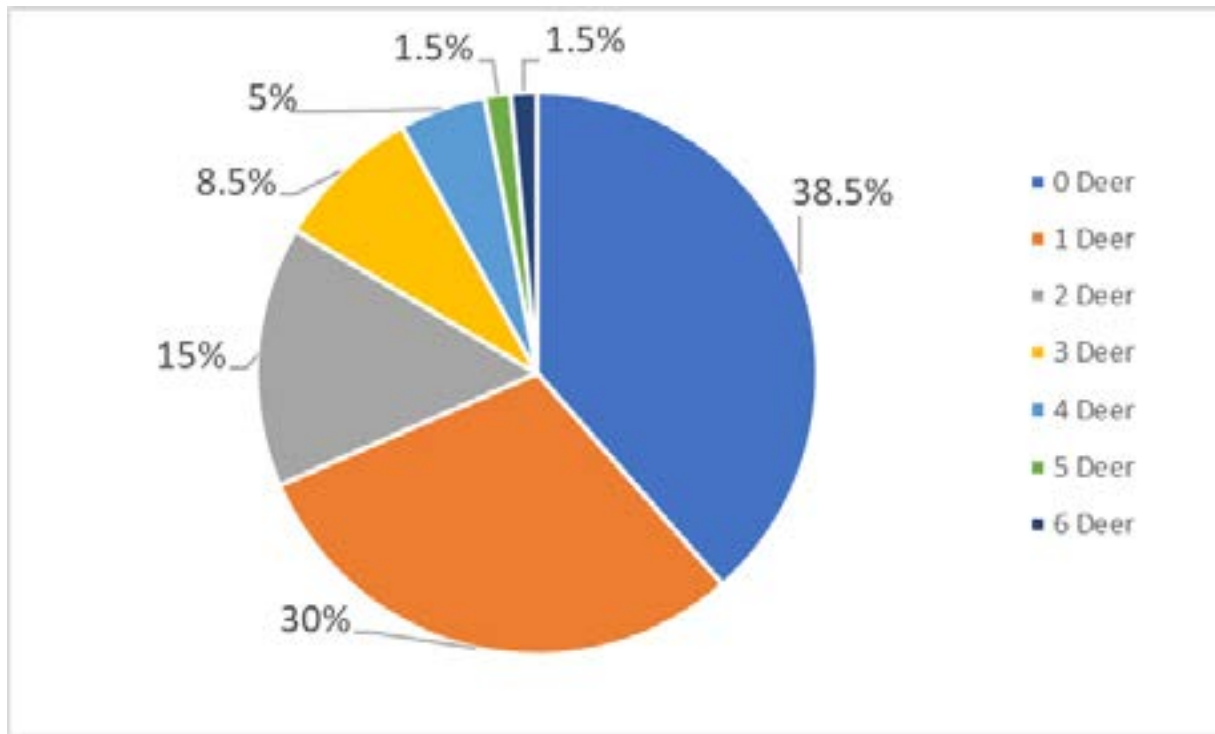


Figure 12. Percentages of NFQUs who report harvesting 0, 1, 2, 3, 4, 5, or 6 deer in , GMU 4, RY19-RY20.

Under federal regulations, FQU hunters were able to harvest six deer prior to RY19 when the State bag limit was raised to six. On average, more FQU hunters take multiple deer than NFQU hunters. For example, 37% of FQU hunters take three or more deer (Figure 13) compared to 16.5% of NFQU hunters.

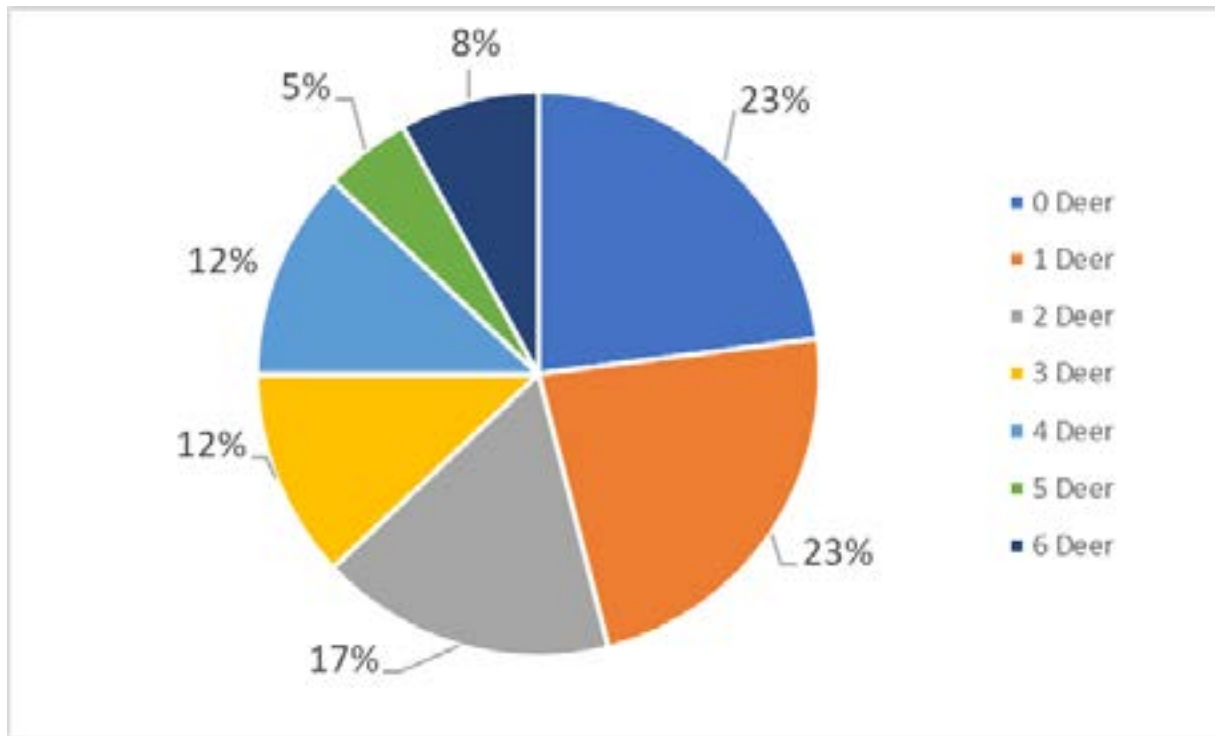


Figure 13. Percentages of FQUs who report harvesting 0, 1, 2, 3, 4, 5 or 6 deer in GMU 4, RY11-RY20.

Doe harvest accounts for approximately 25% of both the FQU and NFQU annual harvest. Since RY13 FQUs have averaged approximately 87 does annually and NFQUs about 93. These calculations do not include RY07-RY12 when doe harvests were restricted to facilitate recovery of the deer herd following the winter of 2006/2007.

Analysis

The analyses presented here are based on several different metrics that come from the only annually collected, objective, and quantitative information available on deer abundance, hunter effort and harvest in the area affected by this proposal. Deer abundance data is not only gathered by ADF&G, but hunters report their effort and harvest to ADF&G, including the local residents of Hoonah.

The proposal asserts that the deer population within the NECCUA is “depleted” and that in recent years FQUs have had difficulty meeting their subsistence needs for deer because of increasing competition from NFQUs. The term, “subsistence need”, as used in Title VIII of ANILCA has no quantitative benchmark analogous to ANS in state regulations. ANILCA also does not require the federal program to quantify historical levels of harvest for subsistence uses. Consequently, there is no objective way of verifying whether the existing federal regulations continue to provide for adequate subsistence harvest opportunity. Therefore, our analysis focuses on measures of deer abundance and trend in GMU 4 and on trends in effort and harvest by FQUs and NFQUs in the proposal area. Conditions that would support the assertion that NFQUs are hindering deer harvest by FQUs would include increasing numbers of hunters, days of hunting effort, and harvest by NFQUs that coincide with declining harvest by FQUs while numbers and effort by FQU hunters remained stable or increased.

ADF&G monitors deer abundance at the scale of the GMU or subunit, so we can only note that the available data indicate GMU 4 deer populations are currently at high and stable levels. Winter severity, particularly deep and lingering snowpack, is the biggest limiting factor for Sitka black-tailed deer in GMU 4. The last winter with above average snowfall occurred in 2011/2012. Since then, winters have been average to mild with little overwinter mortality. Pellet group and aerial alpine deer counts also support the conclusion that deer remain abundant in GMU 4.

The proposal is predicated on the idea that FQUs in the NECCUA area are having an increasingly difficult time meeting their subsistence needs. Because no similar proposal has been submitted before, we can presume that previously FQUs were able to meet their needs. Therefore, to evaluate the need for this restriction of NFQUs opportunity we evaluated harvest and measures of hunter effort for trends of increasing effort and harvest by NFQUs.

We found that harvest by FQUs and NFQUs declined in response to the severe winter of 2006/2007. Since then, harvest by NFQUs has recovered to pre-2007 levels, but harvest by FQUs remains much lower than before RY07. To investigate reasons for declining harvest after the deer population recovered, we examined numbers of FQUs and NFQUs participating in this hunt and days of hunting effort by both groups of hunters. We found that since RY07 the number of individual FQUs within the NECCUA has declined by 50%, whereas the number of NFQUs has returned to pre-2007 levels. Days of hunting effort by FQUs showed a similar trend while days of hunting effort by NFQUs returned to pre-2007 levels. This finding directly contradicts the assertion in the proposal that increasing competition from NFQUs is hindering harvest by FQUs. In fact, total deer hunting effort and the potential for competition between hunters in this area has substantially declined.

To evaluate whether FQUs are having an increasingly difficult time harvesting deer we looked for trends in the number of days of hunting effort required to harvest one deer and number of deer harvested per hunter. Since RY13, FQUs require 2.2 days of hunting effort per deer compared to 3.5 days of effort for NFQUs. Since RY13 days of hunting effort required to harvest a deer has been trending down for FQUs and has been below 2.0 days/deer for 3 of the past 5 seasons.

If harvesting deer was becoming more difficult for FQUs, we would expect to see an increase in the number of days of hunting effort required to harvest a deer and a decline in the number of deer harvested per FQU hunter. While there has been a decline in the number of deer/hunter (2.2 to 1.7 between RY97-RY06 and RY13-RY20), there hasn't been a corresponding increase in days/deer. These measures of hunter success based on hunt reports provided by FQUs, including residents of Hoonah, indicate that deer hunting conditions in the NECCUA remain very good and that in recent years FQUs have enjoyed very good hunting success.

Potential effects of the proposed change on the deer population or FQU harvest are difficult to project. NFQ hunters take on average 93 does annually in the NECCUA. By applying the percentage of NFQUs who take 0, 1, 2, 3, 4, 5 or 6 (only hunters west of Port Frederick can harvest more than three) deer to previous harvests by NFQUs in the NECCUA, the average annual reduction in harvest would be approximately 25 deer west of Port Frederick and 40 deer East of Port Frederick. But, those calculations do not take into account deer harvested below mean high tide and on other State and private lands, or whether hunters would harvest additional bucks if does were not legal. Because NFQUs take an average of only 1.2 deer per hunter, and harvest 75% bucks, the proposed regulatory change is unlikely to affect the deer population or result in any substantial increases in opportunity for FQUs.

Summary

The proposal asserts that the deer population within the NECCUA is depleted and that in recent years FQUs have had difficulty meeting their subsistence needs because of increasing competition from NFQUs. Our analysis of the deer population, hunter effort and harvest trends found no support for either contention. Instead, the available information indicates that deer remain abundant throughout GMU 4. Within the NECCUA it is unlikely that hunter harvest has reduced deer abundance because total hunting effort is relatively light, and over the last 2 decades total hunter effort and harvest have both declined.

We could find no support for the contention that competition from NFQUs has increased or that NFQUs are hindering harvest by FQUs. In fact, the number of NFQUs and days of hunting effort by NFQUs has remained stable over the past 2 decades. Further, days of hunting effort required to harvest one deer remains very low.

Our analysis does indicate a long-term decline in the number of deer harvested by FQUs within the NECCUA. However, that decline is attributable to a decline in the number of FQUs and days of effort by those hunters. Over the last 20 years the number of FQUs and days of hunting effort by those hunters has declined by more than half. Deer remain abundant and competition from NFQUs is unchanged, so we conclude that the decline in federal subsistence harvest of deer results from a decline in participation and effort by FQUs, not depleted deer populations or increasing competition from NFQUs.

Impact on Subsistence Users

The reduction in the bag limit of NFQUs would not have any impact on FQUs given the data showing how many deer NFQUs typically harvest.

Impact on Other Users

Opportunity for NFQUs to harvest deer on federal public lands in the NECCUA would be reduced. Bag limits west of Port Frederick would decline from 6 deer per hunter to 2 bucks. East of Port Frederick the NFQU bag limit would be reduced from 3 deer to 2 bucks.

Opportunity Provided by the State

The State season and bag limit for the NECCUA in GMU 4 is:

GMU 4 NECCUA East of Port Frederick		
Bag Limit 3 deer (bucks only to Sep 14 th)	Resident Open Season Aug1-Dec 31 (Harvest ticket)	Resident Open Season Aug1-Dec 31 (Harvest ticket)
GMU 4Remainder		
Bag Limit 6 deer (bucks only to Sep 14 th)	Resident Open Season Aug1-Dec 31 (Harvest ticket)	Resident Open Season Aug1-Dec 31 (Harvest ticket)

Conservation Issues

There are conservation issues for the deer population in GMU 4. Following 9 consecutive mild winters, the available population indices suggest the GMU 4 deer population remains high and stable. Deer harvest remains within the historical range and state ANS is met in most years. Population indices and measures of hunter effort and success indicate that GMU 4 has the highest population of deer and highest hunting success of anywhere in the state.

Based on the information provided to ADF&G by GMU 4 deer hunters, population indices, anecdotal reports by local hunters and field observations by management biologists we conclude that there is no conservation concern for the GMU 4 deer population.

Enforcement Issues

Passage of this proposal will create increasingly complex regulations for NFQUs. Enforcement will be challenging because NFQU's will remain eligible to hunt deer (including does) on state-owned tidelands below the line of mean high tide and private property. The tideline is not marked, so NFQUs and enforcement officers will have difficulty determining when deer are above or below that line of mean high tide.

Position

ADF&G OPPOSES this proposal because there is no evidence that hunting by NFQUs has affected FQUs ability to harvest deer. There is no conservation concern and therefore no biological justification for reducing the bag limit of NFQUs. Adopting this proposal would deprive NFQUs of sustainable deer hunting opportunity contrary to terms in Title VIII of ANILCA.

Approximately 90% of land in GMU 4 is federally managed, and current federal regulations provide greater opportunity for FQUs compared to NFQUs. FQUs are eligible to hunt an entire month longer than NFQUs with a season extending through January. In the NECCUA, east of Port Frederick (where 70% and 80% of FQU and NFQU harvest occurs, respectively), FQUs have a much more liberal bag limit (6 deer compared to 3 deer for NFQUs) as well as a very liberal designated hunter program.

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 reduction for NFQUs for deer in GMU 4 is inconsistent with ANILCA under applicable case law on federal preemption. 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 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." Based on ADF&G's analysis of the only annually collected, objective, and quantitative data available, neither of those reasons apply. There is no conservation concern for the NECCUA deer population, and no restrictions on NFQU bag limit are needed to continue subsistence uses of deer. Data largely provided by FQUs residing in the NECCUA clearly indicate that the decline in harvest by that user group resulted from substantially lower participation and effort by FQU deer hunters.

Data Tables

Table 1. Number of GMU 4 NFQUs that harvest 0, 1, 2, 3, 4, 5, or 6 deer.

Reg Year	Total Hunters	Zero Deer	One Deer	Two Deer	Three Deer	Four Deer	Five Deer	Six Deer
2011	1533	433	419	296	218	166	0	0
2012	1546	637	446	250	119	94	0	0
2013	1660	579	520	286	170	100	1	0
2014	1808	762	534	287	148	78	0	0
2015	1875	588	559	340	232	155	0	2
2016	1872	596	589	325	220	141	0	0
2017	1783	663	558	303	168	90	0	1
2018	1779	645	550	327	173	83	0	0
2019	1750	664	569	274	124	76	26	18
2020	1793	697	504	253	171	108	29	30
Average	1740	626	525	294	174	109	28	24

Table 2. Number of GMU 4 FQUs who harvest 0,1,2,3,4,5, or 6 deer.

Reg Year	Total Hunters	Zero Deer	One Deer	Two Deer	Three Deer	Four Deer	Five Deer	Six Deer
2011	1644	246	304	282	200	247	115	251
2012	1578	424	328	256	234	155	73	108
2013	1644	408	402	291	174	184	91	95
2014	1662	536	375	280	178	157	66	71
2015	1903	412	472	328	235	243	104	108
2016	1883	340	386	281	235	322	123	196
2017	1717	462	400	305	217	175	76	83
2018	1684	414	441	302	215	144	80	88
2019	1646	277	404	278	198	201	121	167
2020	1464	402	339	251	186	138	64	86
Average	1683	392	385	285	204	207	91	125

Table 3. Summary Table Federally Qualified Deer Hunters WAAs 3523-3526, 3551, 4222, 4252 and 4253.

Regulatory Year	No. of Hunters	Total Hunt Days	Bucks Harvested	Does Harvested	Total Harvest	Deer per Hunter	Days per Deer
1997	345	1692	545	159	704	2.04	2.40
1998	347	1586	545	168	713	2.05	2.22
1999	391	1640	482	228	711	1.82	2.31
2000	334	2933	517	164	682	2.04	4.30
2001	378	2215	531	270	800	2.12	2.77
2002	325	2246	710	53	763	2.35	2.94
2003	276	1134	528	183	711	2.58	1.59

Regulatory Year	No. of Hunters	Total Hunt Days	Bucks Harvested	Does Harvested	Total Harvest	Deer per Hunter	Days per Deer
2004	261	1429	513	194	708	2.71	2.02
2005	358	1609	707	357	1064	2.97	1.51
2006	319	2026	466	150	616	1.93	3.29
2007	230	879	115	25	141	0.61	6.23
2008	192	1190	177	10	187	0.97	6.36
2009	161	759	182	0	182	1.13	4.17
2010	192	989	283	32	348	1.81	2.84
2011	196	1010	378	12	390	1.99	2.59
2012	220	894	296	33	331	1.50	2.70
2013	213	853	267	94	361	1.69	2.36
2014	260	1004	275	83	358	1.38	2.80
2015	314	1527	435	113	548	1.75	2.79
2016	246	889	462	77	540	2.20	1.65
2017	223	726	235	71	306	1.37	2.37
2018	238	803	324	98	422	1.77	1.90
2019	214	643	283	70	353	1.65	1.82
2020	203	719	229	88	316	1.56	2.28

Table 4. Summary Table NFQU Deer Hunters WAAs 3523-3526, 3551, 4222, 4252 and 4253.

Regulatory Year	No. of Hunters	Total Hunt Days	Bucks Harvested	Does Harvested	Total Harvest	Deer per Hunter	Days per Deer
1997	206	850	200	34	234	1.14	3.63
1998	290	993	275	113	388	1.34	2.56
1999	311	1482	226	136	362	1.16	4.09
2000	360	1345	363	72	435	1.21	3.09
2001	244	1067	219	82	301	1.23	3.54
2002	383	1475	302	77	378	0.99	3.90
2003	331	1318	435	135	570	1.72	2.31
2004	303	1095	333	118	451	1.49	2.43
2005	293	1106	308	115	424	1.45	2.61
2006	326	1372	386	93	479	1.47	2.86
2007	155	641	39	5	44	0.28	14.57
2008	202	823	125	0	125	0.62	6.58
2009	92	416	57	0	57	0.62	7.30
2010	188	805	157	0	157	0.84	5.13
2011	157	843	172	11	184	1.17	4.58
2012	262	1142	217	14	232	0.89	4.92
2013	249	1048	212	76	287	1.15	3.65
2014	293	1310	248	78	325	1.11	4.03

Regulatory Year	No. of Hunters	Total Hunt Days	Bucks Harvested	Does Harvested	Total Harvest	Deer per Hunter	Days per Deer
2015	320	1405	313	114	427	1.33	3.29
2016	331	1339	327	100	427	1.29	3.14
2017	337	1334	274	127	400	1.19	3.34
2018	323	1270	305	62	366	1.13	3.47
2019	269	995	231	68	299	1.11	3.33
2020	275	1005	243	121	364	1.32	2.76

WRITTEN PUBLIC COMMENTS

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Alaska Outdoor Council comments - 2022-2024 Wildlife Proposals

Rod Arno <rodarno@gmail.com>

Mon 7/19/2021 12:23 PM

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

Cc: Mulligan, Benjamin J (DFG) <ben.mulligan@alaska.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Alaska Outdoor Council
310 K Street, Suite 200
Anchorage, Alaska 99501
July 19, 2021

RE: Public comments for FSB 2022-2024 Wildlife Proposals

The Alaska Outdoor Council (AOC) is a statewide coalition of individual members and clubs representing 19,000 Alaskans who hunt, trap, fish and recreate on public lands/waters in Alaska. AOC Club Representatives have participated in the regulatory process of managing and allocating fish and game in Alaska since before statehood in 1959.

Numerous proposals submitted by Federal Subsistence Regional Advisory Councils, federally recognized subsistence communities, and individuals confirm the fears that many AOC Representatives had at the time of the passage of Alaska National Interest Lands Conservation Act (ANILCA) 1980. Dual management of who can harvest game depending on whether you are on state public and private lands or if you are on federal lands was not the intent of Congress when they passed ANILCA.

AOC opposes WP22-07, WP22-08, WP22-09.
Alaska Department of Fish & Game data should not invoke a complete closure to non-Federally Qualified Subsistence Users under Section 804 of ANILCA. Even the 9th Circuit Court, *Muskieak Traditional Council v. U.S.*, 227 F.3d 1186 in 2000 understood the priority given in Title VIII of ANILCA was not absolute.

AOC opposes WP22-15.
Congress's findings and declaration in Sec. 801 of ANILCA should leave no room for regulatory action by the Federal Subsistence Board (FSB) regarding anti-trapper claims. Sec. 801(3) of ANILCA should have the FSB concentrating only on "remote federal lands", as was the intent of Congress when they passed 802(2) of ANILCA.

AOC opposes WP22-16 thru 22.
Providing a priority for some individuals or communities to harvest game on federal public lands located on the Kenai Peninsula only exacerbates the conflict between federally qualified hunters and Alaskans living in non-federally qualified areas of the state. Both groups of hunters are similarly situated.

AOC opposes WP22-32.
It would be in Alaska's best interest if the FSB would reduce the number of Alaskans allowed a priority to harvest game on federal lands just based solely on where they live, not how.

Thanks for the opportunity to provide public comments.

Rod Arno, Public Policy Director
Alaska Outdoor Council

Sent from Rod Arno's iPad.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQKADZINDE2M2RnLWWOTgtNDQ1OS04YjQxLWE0YzY0NW13MDNjZQAQAL9rk...> 1/1

To Whom It May Concern,

I am writing today thankful for the opportunity to voice my opinion regarding the following proposals.

WP22-07 - To exclude hunting privileges in this region to Juneau residents who depend solely on deer meat to survive is simply outrageous. Angoon hunters DO NOT hunt anywhere remotely close to Hawk Inlet and have the benefit of hunting more productive and safer waterways near town. (Mitchell Bay) Where Juneau residents even on a good weather day cannot reach. It will confine hunting areas to Juneau residents which will increase pressure on already overcrowded areas furthermore helping to create unsafe scenarios. It is discriminatory, unethical, and does not show good land management for the "American people" rather it divides and polarizes Alaskans in the region.

WP22-08 – I hope this is not a biased proposal toward Juneau hunters and is actually based on science relating to current deer populations. How did we go from 6 to 2? Snow and ice lead to winter die off which effects overall deer populations not hunters.

WP22-09 - Rural hunters outside of Juneau already have the benefit of a longer harvest period. Just because our jobs and lives are based in Juneau does not mean we want the high cost of inferior meat from Costco.

In closing please do not take away these beautiful places to Juneau residents limiting our access to the outdoors, feeding our families, and the social benefits hunting brings us.

Thank you



Adam S. Anderson

Mike Bethers
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Auke Bay, AK 99821
(907)-321-1186
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June 22, 2021

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

Re: Wildlife Proposals 22-07, 22-08, and 22-09

Dear Mr. Matuskowitz:

Please include these comments in the public record. Please give a copy to each board member.

Subsistence deer hunters (Federally Qualified Users or FQUs) from Angoon, Hoonah and Pelican are claiming that non-subsistence deer hunters (Non-Federally Qualified Users or NFQUs) are out competing them for blacktail deer. Village residents are federally qualified and already have priority use of the deer resource as their season runs through January 31, while the NFQU season ends December 31.

The Southeast Alaska Subsistence Regional Advisory Council has developed three wildlife proposals – 22-07 Angoon, 22-08 Hoonah, and 22-09 Pelican – to address claims that NFQUs are responsible for reduced subsistence harvests in these villages. These proposals are based only on comments from villagers and are not based on any actual data or documented observations.

Based on my personal observations made deer hunting in Northern Southeast Alaska over the last fifty years and findings of the Alaska Department of Fish and Game (ADF&G) harvest studies, these proposals can not be justified in any way and should not be adopted.

I have been a lifelong deer hunter and am over seventy years old. The last several years I've spent more than fifty days in the woods annually, and for the last fifty years, my hunting has been in Northern Southeast Alaska; I've hunted in all areas included in these proposals. I can still get up the mountain farther than I can get a big buck out of the woods and am very selective of what I harvest and where. I use a boat to access my hunting areas and do a lot of calling and don't hunt from drivable roads. I haven't been on the Hoonah road system in decades. Every year I let many deer walk away rather than shoot them and have absolutely no problem getting enough deer to meet my family's needs.

Theo Matuskowitz

June 22, 2021

Page 2

Following are comments that apply to all three proposals (22-07, 22-08, and 22-09)

NFQUs already have priority to deer as they can hunt through January when deer are often most available while NFQU's season ends December 31.

The winter of 2007-2008 saw a record high snowfall throughout Northern Southeast Alaska and as a consequence, deer were driven to the beach in numbers not seen since. They were at the peak of availability. Since the winter of 2007-2008 there has been less snowfall and deer have not hit the beach in numbers seen during the 2007-2008 winter. In the last three to four years there has been less snow and more rain. Deer have not herded up on the beach much and it has been more miserable to hunt in the rain but hunters I associate with, that like to hunt and eat venison, were out there hunting.

In the areas I've hunted the last ten years, I have seen fewer hunters than in earlier years.

Since the deer killing winter of 2007-2008, the deer populations in all three areas have rebounded and currently are at or near all time highs.

Comments on 22-07 Admiralty

This proposal would essentially close federal lands from Pt. Marsden to Pt. Gardener to deer hunting by NFQUs from September 15 through November 30.

Most NFQUs from Juneau who hunt the West side of Admiralty usually turn around at Funter Bay or Hawk Inlet as there are few to no good anchorages south of Pt. Marsden. Also, the proposed closed area is too far from Juneau for day trips. It is my belief that most subsistence hunting from Angoon is done on the beaches, which are not included in this proposal as beaches are state land.

I know several NFQU hunting parties that hunt West Admiralty, mostly north of Pt. Marsden, and they are typically quite successful. I know of two parties of NFQUs that hunt out of Angoon and they always get their deer.

Comments on 22-08 Hoonah

Hoonah has really degraded local wildlife habitat through extensive clear-cut logging (which has been shown to significantly impact wildlife values over the long period) and the extensive road system (which has been shown to also reduce the area's wildlife values). The Hoonah road system has become a favorite place to conduct hunting by Hoonah residents, especially after doe season opens. Please note that reduced sailing schedules of the Alaska Marine Highway's ferries have reduced opportunity for NFQUs from Juneau to get to Hoonah to compete with local hunters.

Over the years, deer have adjusted to the heavy hunting pressure along the Hoonah road system. After a week or two of harassment by road hunters, surviving animals move away from the roadside. However, I know those that hunt in the woods accessed by the Hoonah road system have had no problem finding deer.

Theo Matuskowitz

June 22, 2021

Page 3

I have heard of two Hoonah residents who in the past typically shot many more deer than the limit, which would take deer away from other hunters.

Also please note that data shows there is minimal exchange of deer between the north shore of Tenakee Inlet and areas accessed by the Hoonah road system. The mountains on the north side of Tenakee Inlet serve as a dividing line for Tenakee Inlet deer and deer living north of the mountains in areas accessed by the Hoonah road system. Therefore, only areas accessed by the Hoonah road system on northeast Chichagof Island should be included in proposal 22-08 and the north shore of Tenakee Inlet should be excluded.

ADF&G deer harvest and hunter effort data applies to all three proposals.

1. Deer populations are at very high levels.
2. There have been substantial decreases in hunting effort by FQUs
3. There has not been any noticeable increase in hunting effort by NFQUs
4. The reduced number of FQUs still hunting are harvesting more deer than in the past.
5. There is simply no justification to support any of the three proposals.

In conclusion

There are very high numbers of deer available in all areas covered by these proposals, however, FQU hunters are no longer hunting. They are not taking advantage of the standard deer season (August 1 – December 31) or their priority opportunity of hunting through January. Deer are often most available during January, due to winter snow levels, etc.

Any restriction of NFQU deer hunting opportunity will not increase subsistence harvests in the villages. FQUs from the villages need to get out of the house and out of their vehicles and back into the woods to get their deer. They will have no problem.

Proposals 22-07, 22-08, and 22-09 are based on inaccurate beliefs of FQUs in the villages and lack any justification. Adoption of any of these proposals would be a needless and huge disservice to many hunters in northern southeast Alaska, hunting a strong public resource, on public lands.

Please reject (not approve) proposals 22-07, 22-08, and 22-09.

Thank you for the opportunity to comment.

Sincerely,

Mike Bethers
Auke Bay, Alaska

Mike Bovitz

9500 N Douglas Hwy

Juneau, AK 99801

(907)723-2279

Metalsworks@gci.net

Theo Matuskowitz

Federal Subsistence Board

Office of Subsistence Management

1011 East Tudor Road , MS-121

Anchorage, Ak 99503-6199

Re: wildlife proposals 22-07, 22-08, and 22-09

Hello Mr. Matuskowitz:

I am NOT in support of the 3 wildlife proposals-22-07 Angoon, 22-08 Hoonah, and 22-09 Pelican.

The rural subsistence deer hunters/Federally qualified users are claiming it is getting harder to fill their quota of deer. They are concerned about the potential of not enough deer for their personal use to live a subsistence living. There is no science based facts to what is being questioned or science based facts to what they are stating on the deer population.

Alaska fish and game do harvest studies, pellet counts, flights for deer etc, etc. This is all paid for by every Alaskan through tax dollars. Based on their science the number of deer is quite plentiful and Federally Qualified Users already have an extended season going through January 31st. Alaska fish and game last year allowed every resident 6 deer instead of the normal 4. Why would they do that if there was a resource problem?

The only thing that has changed over the past years is our weather pattern. Snow is no longer coming in and staying on the beach for long periods of time driving the deer to the beach. Which is a good thing because as those big snow falls happen mother nature NOT man takes over and the deer start to die .

Proposals 22-07, 22-08, and 22-09 are not science based, have no justification, and would be the wrong thing to do to many Southeast Alaska hunters, hunting a public resource.

Please REJECT and NOT APPROVE proposal 22-07, 22-08, 22-09

Thank you for your time,

Mike Bovitz

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] SE Deer Hunting

Lee Bridgman <Lee.aklife@outlook.com>

Fri 7/9/2021 1:53 PM

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

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RE: proposed changes to deer hunting in Unit 4 are WP22-07, WP22-08, WP22-09, and WP22-10.

I myself do not hunt in the Southeast and do not believe the large numbers are making their way to hunt deer in this area. The cost of getting there compared to the game meat taken would make the trip counter productive. As for the Wanton Waste of game meat, I would believe that F&G would be very able to check vessels arriving in Juneau for proper care of the game meat.

The proposals will only further divide the user groups, which is not a desired result. If limits need to be reduced, for all, then so be it.

Do not proceed with these proposals.

Thank you,

Lee H. Bridgman

763 Wanda Dr

North Pole, AK 99705

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWwOTgtNDQ1OjS04YjGxLWE0YzY0NWl3MDNjZQAQAEEx...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Public comment: Wildlife proposals 22-07, 08, 09

Kelly Cates <kacates@alaska.edu>

Mon 7/19/2021 9:31 PM

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

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Dear Subsistence Management Board,

I am writing in opposition to wildlife proposals 22-07, 22-08 and 22-09. I am a SE hunter and my family regularly hunts in each of the proposed areas. We rely on subsistence meats to feed us through the year and enjoy the memories created from our hunting trips. It is unclear to me why these proposals were initiated as the data outlined in the packets suggests that deer populations are thriving and that FQU's are harvesting more deer than they used to. So if there are plenty of deer and enough for all users, why should one user group be excluded? Again, I oppose these proposals and hope the facts outlined in the information packets are fairly weighed in the boards decision.

Thanks,
Kelly Cates

--

Kelly Cates, PhD Candidate

College of Fisheries and Ocean Sciences

Juneau Fisheries Division, University of Alaska Fairbanks

kacates@alaska.edu (360) 429-5032

"May your trails be crooked, winding, lonesome, dangerous, leading to the most amazing view"



<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/d/AAQkADZINDE2MZRhLWVOTgtNDQ1QSD4YjQxLWE0YzY0NW13MDNjZQAQAEh...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comments for WP22-07,8,9,10**Matthew Catterson <mattcatterson@yahoo.com>**

Fri 7/16/2021 4:30 PM

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

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Federal Subsistence Board Members,

I am writing to comment in respectful opposition to the regulatory actions proposed in WP22-07, WP22-08, WP22-09, WP22-10. I am currently a resident of Juneau, but I have spent most of the past 15 years residing in the Southeast Alaska communities of Yakutat and Sitka. My time living, working, fishing, and hunting in these communities has engendered in me a great respect and connection to the subsistence lifestyle.

Because of my background, I can certainly empathize with the concerns presented by the authors of these proposals. However, the information provided in ADF&G Department comments is aligned with my experiences hunting in the proposal areas, which is that hunting effort in these areas is minimal and that competition between hunters is not responsible for trends of reduced deer harvest by FQUs or NFQUs. I believe it is widely accepted that environmental conditions (harsh winters), not hunting pressure, is the primary driver of deer abundance in Northern Southeast Alaska.

I would ask Federal Subsistence Board members to very carefully consider these proposals that significantly reduce available hunting areas to residents of Juneau. As you know, just because someone lives in a larger community like Juneau, does not mean they don't live a subsistence lifestyle and place great cultural, traditional, and personal value on a connection to the natural world that is based on procuring food for themselves, their family, and their community. The closures and bag limits reductions in these proposals would significantly impact traditional hunting use patterns for many people who live in Juneau and should only be enacted in extremely dire circumstances.

As an alternative, I would not oppose regulatory changes that increase opportunity for FQU's while maintaining existing hunting opportunity for NFQUs. This type of regulatory change, coupled with ADF&G assertions that deer abundance is relatively stable in proposal areas, may achieve the increased harvest sought by proposal authors.

Thank you for your time and consideration of my comments.

Matt Catterson, Douglas, Alaska

<https://outlook.office365.com/mail/subsistence@fws.gov/deepink?popoutv2=1&version=20210711001.05>

1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Unit 4 WP22-07, WP22-08, WP22-09, WP22-10 Proposed closure of Blacktail deer seasons to non-subsistence hunters

Ken Couch <kc_n_gurls@yahoo.com>

Mon 7/19/2021 5:35 AM

To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>; AK Subsistence, FW7 <subsistence@fws.gov>

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

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I am opposed to these proposals because there is no scientific evidence or biological data to support these recommendations. ADFG biologists are on record stating the proposed closures will unnecessarily restrict non-subsistence hunters of opportunity to hunt contrary to Title VIII of ANILCA. There is no biological evidence or even a reason to believe that non-subsistence hunters are affecting the federally-qualified subsistence hunters ability to harvest deer.

I am getting tired of RACs, aided and abetted by the Subsistence Office of FWS Region7 continuing to waste public funds on these frivolous proposals to give federally-qualified subsistence hunters a private hunting club paid for by all Federal tax payers. Federal Regulations REQUIRE that the proponent of any rule change has the burden of proof to show the proposed change is necessary. The RAC has not provided any proof. Instead, all this is just wasting tax dollars. Maybe all the non-subsistence hunters should start making frivolous proposals that the RAC has to fight. Then maybe they would not have time to waste time and tax dollars on unsubstantiated claims.

Ken Couch

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/d/AAGkADZINDE2M2RhLWwOTgtNDQ1OjS04YjQxLWE0YzY0NW13MDNjZGAGAHD...> 1/1

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Proposals 22-07/08/09

Elias Daugherty <elias1547@yahoo.com>

Mon 7/12/2021 4:39 PM

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

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I Elias Daugherty

Oppose the proposal 22- 07/08/09

The deer numbers show healthy and Sustainable.

I do think that nNon-residents becoming residents should have a stricter and longer qualification period
For hunting

Privileges

Such as a 5 year stay required.

I also believe if there is a concern about deer numbers being taken that the price for non-resident deer
tags should increase. And Stricter non-guided deer hunts.

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWWOTgtNDQ1OjS04YjQxLWE0YzY0NW13MDNjZGAGANW...> 1/1

6/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-08

sam davis <ffdavis769@gmail.com>

Sat 6/19/2021 11:22 AM

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

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I have an alternative to this proposal that would be a win win for everyone involved. Rather than limiting deer harvest limit to non subsistence hunters who still rely on that meat for filling freezers, why not increase predator control in the northeast chichagoff control use area. Hoonah has always had a history of brown bear problems in town. The first option would be to allow a brown bear every regulatory year. The second option would be allow land motor vehicles to be used in the taking of brown bear. Lower the number of bears in the area and raise the fawn survival rate. I hope you take this into consideration. Thank you for your time.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlUWOTgtNDQ1OS04YjQxLWE0YzY0NW13MDNjZQAQABN...> 1/1

7/1/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

John Demuth <jdemuth@pndengineers.com>

Wed 6/30/2021 5:46 PM

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

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Attention: Theo Matuskowitz

The intent of this email is to voice my opposition to the following proposals:

- WP22-07
- WP22-08
- WP22-09

The population of deer in these areas (as all areas in SE Alaska and Kodiak) has historically been impacted primarily by weather, and in particular the amount of snow experience in a given winter/early spring – NOT by the small percentage of hunters who may choose to venture further away from towns/areas with greater hunting pressure – i.e. Juneau. When heavy snow kills off deer, EVERYONE feels the impacts due to reduced numbers of deer.

W22-07 in particular is extremely exclusive and excessive as it covers over 70 miles of the west side of Admiralty Island – 40 miles north and 30 miles south. This is simply outrageous. NOBODY in Angoon hunts 30-40 miles from town, but rather they hunt primarily in Mitchell Bay due to the close proximity and favorable weather conditions – i.e. protected from high wind/waves. In addition, the vast majority of hunting pressure on the south end of Admiralty is from Petersburg and Kake hunters – who also qualify as subsistence hunters and hence will continue to compete with Angoon hunters – effectively changing nothing. The proposal clearly is intended to exclude Juneau hunters from hunting on the west side of Admiralty Island and will hence increase hunting pressure on the east side of Admiralty. The intent seems reasonable, but the range/area is far too large and should be reconsidered to be more focused on the immediate area around Angoon.

Thank you for your consideration.

• John DeMuth

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/d/AAQkADZINDE2MZRhLWVOTgINDQ1OS04YjQxLWE0YzY0NW13MDNjZG9hAAPs...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Public Comments Regarding Subsistence Management Program 2022-2024

Jared Erickson <erickson_jared@yahoo.com>

Sat 7/17/2021 7:43 AM

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

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Public Comments Regarding Federal Subsistence Management Program 2022-2024:

WP22-07

WP22-08

WP22-09

WP22-10

Federal Subsistence Board:

I would like to take this opportunity to voice my opposition to the proposed changes to the above referenced deer hunting regulations in SE Alaska. To manage a population of a targeted animal species for harvest, I do believe it would be a mistake to consider anything other than the health of the population of that species. The ADF&G recently produced a comment response to the above proposed changes and the general trends show that there are fewer FQU's hunting, and they are hunting fewer days per year. The data also strongly suggested that the the Sitka Black Tail Deer populations in the areas referenced above are absolutely healthy and stable. That is, it has been a renewable source of food for all user groups for many years. The above proposals also do not take into account that deer at, or below, the mean high tide mark would still be eligible for harvest by the NFQU user group. I believe that this would actually make the concern worse due to the fact that all hunting efforts in these areas by NFQU's would be focused on the easier deer to harvest. If a NFQU is not allowed to harvest deer at elevation, or via flying into a lake that drains into these areas, the focus will shift to the deer near below the mean high tide level. This would generate the exact opposite effect as what is desired. I also believe it would be very hard to enforce the new proposals. The most concerning example I can think of is what will happen if a deer is shot below mean high tide, but then expires and is recovered above the mean high tide? A difficult scenario and one that invites controversy.

The above areas do have a natural barrier against too much traffic. For the months of concern, the population from Juneau must transit around Point Retreat and navigate Southern Lynn Canal to get to these areas if they are hunting by boat. This is the same body of water that will often prevent the Alaska Marine Highway System from making scheduled trips due to wave height and wind. The FQU's are positioned in the heart of the best hunting areas, giving them distinct geographic advantage.

If the true problem is FQU's not meeting their ANS, there are alternatives to the above proposals. Perhaps the Subsistence Board could consider subsidies to the FQU's in terms of fuel or equipment. Another option may be to liberalize proxy hunting for the communities in need. But if the real reason the FQU is experiencing a decrease in deer harvest rates has to do with fewer hunters putting in fewer days we should not penalize other user groups who use the same resource for the same reasons.

I have been a resident of Alaska my entire life, nearly 45 years, and Sitka Blacktail Deer from the regions above are an important part of calories for myself and my family throughout the year. I would like to voice my support for keeping the hunting regulations as they are and not preventing NFQU's the opportunity to continue to utilize this healthy, renewable source of food in our region.

Sincerely-

Jared Erickson

Juneau, AK

<https://outlook.office365.com/mail/subsistence@fws.gov/inbould/AAQkADZiNDE2M2RhLWVOTgtNDQ1OjS04YjGxLWE0YzY0NW13MDNjZGAGAGq...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comments RE: All Southeast deer proposals, including but not limited to WP22-07, WP22-08, WP22-09, and WP22-10

Kyle Ferguson <pabucktail@hotmail.com>

Mon 7/19/2021 5:34 PM

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

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As an over 20 year resident of Sitka, and a federally qualified subsistence deer hunter, I would like to state my opposition to the proposals attempting to limit the deer hunting opportunity for non-qualified hunters in Southeast Alaska. My opposition is for the following three reasons:

First, there is no valid scientific reason for the proposed limitations. There are currently no existing or anticipated population concerns for deer in Southeast Alaska. Deer numbers across the region are increasing. With the general pattern of mild winters in the last decade Admiralty, Baranof, and Chichagof deer numbers are as good as they've ever been. In GMU 3 it looks like deer numbers are the best they've been in at least a generation. Scientific study of deer numbers in GMU 4 showed that numbers are high enough to sustain a limit for all residents of 6 deer per year. Anecdotal information from hunters and people who live in Southeast's subsistence communities indicates the general impression of excellent deer numbers.

Secondly, there is no valid social reason for the proposed limitations. In a 7/16/21 article in the Sitka Sentinel members of the Regional Advisory Council were interviewed and stated their rationalizations for these proposals. The reasoning revolved around perceptions of unfairness related to boats and trucks owned by other hunters accessing hunting areas, and perceptions of increased competition and decreased opportunity for federally qualified users. Neither of these points stands up under the scrutiny of facts. No matter who we are, there will always be someone with a better truck or boat than any one of us. Being offended by this reality will make us all a bunch of victim-based thinkers, and in sum are the mere voice of emotions rather than real facts. In regards to the idea of increased competition and decreased opportunity, if anywhere were to qualify for such an idea it would be Sitka, the subsistence community with the greatest numbers of qualified, non-qualified and non-resident hunters. In spite of the greatest numbers of competition, Sitka hunters don't seem to have a problem meeting their subsistence deer meat needs. This fact was acknowledged by Sitka RAC member Harvey Kitka who stated Sitka hunters don't have the problems alluded to by the RAC members from other communities.

In contrast, there are actual social reasons for rejecting these proposals. Deer hunting anywhere, but especially in Southeast Alaska, is a time-honored activity which affords people an opportunity to sustain themselves while enjoying and passing on a heritage that transcends generations. We all live in small towns here. The reality is that for reasons of employment, marriage, medical concerns, education, or various other factors, any one of us could find ourselves with family members living in non-qualified Alaska communities, or down south. I hate to envision a scenario where a grandfather in Sitka, an uncle in Angoon, or father in Kake couldn't take a young person deer hunting because a proposal such as this made it illegal to mentor the next generation.

Lastly, data and facts shows there's no practical reason for the proposed limitations. In the same 7/16/21 Sitka Sentinel article ADF&G biologist Steve Bethune was interviewed. He pointed out some

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7/21/2021

Mail - AK Subsistence, FW: - Outlook

interesting facts related to hunter effort. Across the region it seems hunting pressure is light. Additionally, non-qualified hunter effort has remained stable while hunting effort by qualified subsistence hunters has declined. I don't know why there are presumably less qualified subsistence hunters, or why the same numbers of hunters are hunting less days. But the fact remains that the data shows if anything, hunters in the communities involved in this proposal have even greater opportunity than they did ten or twenty years ago.

Thank you for your hearing and consideration,

Kyle Ferguson, Sitka

sent from [Outlook](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/d/AAQkADZINDE2MZRhLWVOTgtNDQ1QSD4YjQxLWE0YzY0NW13MDNjZQAQAIsn...> 2/2

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] opposition to these proposals

Ron Flint <ron@nuggetoutfitter.com>

Mon 7/19/2021 2:02 PM

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

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Federal Subsistence Board;

Count me in opposition to the following proposals.

1. western Admiralty from Sept 15 to Nov 30 that includes Hawk Inlet and south WP22-07
2. reduced bag limit for Chichagof (Hoonah and Tenakee, Freshwater Bay) from 3 to 2 WP22-08
3. closure of Lisianski Oct 15-Dec 31 WP22-09

Thank you for your time,

Ron Flint

12070 Cross St.

Juneau, AK. 99801

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RnLWVOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNlZGAGAPIS...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comments regarding 22-07, 22-09

Peter Flynn <flynn.peter@gmail.com>

Mon 7/19/2021 8:32 PM

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

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To whom it may concern,

I am an active hunter from Juneau, AK who would be affected by proposals 22-07 and 22-09. Myself and the group of people whom I hunt with also respect and hold great respect for the subsistence rights of other people in this state and wholly support their right to put food in the freezer. As hunters we hunt what only we can eat, aren't after trophies, and respect the land. We often hunt out of a cabin off the hoonah road system, always enjoying our conversations with neighbors and locals whether on the ferry, on the roads, or in town. We also fly into many of the affected areas, sometimes directly from Juneau sometimes from other local airports, enjoying the cabins and beautifully different terrains that are available there. I am opposed to the aforementioned proposals as I believe there are better tools than closure to ensure that subsistence needs are protected without wholly excluding other parties, especially with such a healthy population of blacktails. Other tools are available that would provide for all affected parties such as altering bag limits depending on your subsistence qualification. Curtailing bag limits for non-subsistence-qualified hunters in these areas would keep subsistence as the dominant harvests while regional hunters from larger towns would be able to participate, as is being proposed in 22-08.

Thank you for your consideration,

Peter Flynn

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/dAAQkADZINDE2M2RhLWwOTgtNDQ1OjS04YjGxLWE0YzY0NW13MDNjZQAQAMg5...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-07, WP22-08, and WP22-09

Charles Frey <cfrey09@gmail.com>

Fri 7/16/2021 3:36 PM

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

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I am firmly opposed to WP22-07, WP22-08 and WP22-09. These proposals rely on hearsay & unscientific data to back up the proposed changes. The Alaska Dept of Fish & game who studies these areas is opposed as they cite healthy deer numbers. In addition, these areas are hard to access & have relatively light hunting pressure. This is pure & simple federal overreach & an attempt to lock down Alaska's wilderness for a self-serving reason by those in charge & those who sponsored these proposals.

Regards,
Charles Frey

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Opposition of proposals 22-07, 22-08 and 22-09

Mary Graves <Mare_e86@hotmail.com>

Mon 7/19/2021 1:24 PM

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

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Dear Federal Subsistence Board,

These proposals do not seem to be being proposed based on science and monitoring of deer populations. ADF&G recently INCREASED the annual bag limit of deer from 4-6 in Port Frederick. FQUs are also allotted an additional month (January 1-31) to subsistence hunt, which actually puts unnecessary pressure on deer during the hardest month of winter for the deer, and the easiest month for someone to harvest a deer as they get pushed down to the beaches. These proposals add unnecessary restrictions to Juneau and Ketchikan residents. ADF&G assessments for all units to do support these proposals. I, also, do not support them.

Mary Graves

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/d/AACkADZINDE2MZRhLWVOTgtNDQ1QSD4YjQxLWE0YzY0NW13MDNjZQAQAKK...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] opposition to all federal deer subsistence proposals. WP2207 -- Wp2212

RICHARD HARRIS <RHDevelopment@gci.net>

Thu 7/15/2021 12:38 PM

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

Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Attn: Theo Matuskowitz,
Office of Subsistence Management
Regarding : Federal deer subsistence proposals Region-1 Southeast Alaska
Proposal Numbers: WP2207, WP2208, WP2209, WP2210, WP2212

As a lifelong deer hunter of Southeast Alaska I am writing to oppose the federal subsistence proposals for deer harvesting in Southeast Alaska. I have hunted some of these areas my entire life, access to the areas listed is very difficult, needing good weather and much planning, I believe the weather controls much of the hunting pressure from non-federally qualified users in these areas(somewhat self regulating). I could understand supporting a lower per hunter harvest number in some areas, but shutting these areas down entirely during the period of Oct. 15 - Dec. 31, to non-federally qualified hunters is not acceptable. Limiting hunting to any months other than Oct. 15 - Dec. 31 should be considered a complete shut down as this is the only period a hunter can actually hunt and experience the calling of a deer, during the rutting season. Any regulation changes made should include some changes to the federally qualified user as well, not all but some are doing as much damage to the resource with immediate access and extended hunt seasons as the non-federally qualified user who has limited access and shorter harvest seasons. Also as I understand these proposals have no basis, there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. I hope you will take these comments into consideration and reject these proposals.

Thank you,

Richard Harris
P.O. Box 32403
Juneau, Alaska 99803

Richard Harris

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/d/AAQkADZINDE2M2RhLWVOTgtNDQ1OjS04YjQxLWE0YzY0NW13MDNjZGAGAOyO...> 1/2



Post Office Box 32712 • Juneau, Alaska 99803

Telephone: (907) 789-2399 • Fax: (907) 586-6020

July 14, 2021

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

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-08) to reduce the deer hunting bag limit to 2 deer within the Northeast Chichagof Controlled Use Area (NECCUA) for non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on in NECCUA, ADF&G increased the annual bag limit from 4 to 6 deer west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort have remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer (compared to 3 deer for NFQUs). This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

TSI opposes this proposal and respectfully asks that it not be adopted.

Sincerely,

A handwritten signature in dark ink, appearing to read "Shawn Hooton".

Shawn Hooton
Vice President, TSI

Sportsmen Promoting Conservation of Alaska's Fish and Wildlife Since 1945

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Subsistence proposals for Sitka Blacktail Deer in AK**Brooks Horan <brookshoran@yahoo.com>**

Wed 7/14/2021 9:58 AM

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

 3 attachments (2 MB)

WP22_09 ADFG comments Draft_Final.pdf; WP22_06 ADFG comments Draft_Final.pdf; WP22_07 ADFG comments Draft_Final.pdf;

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Dear Sir/Ma'am,

I am writing to express my lack of support for the proposed changes to sitka blacktail hunting in SE Alaska. The data just does not support these changes. I understand that the purpose of the subsistence board is to listen to rural residents in AK. I have respect for the decisions made by the board to ensure proper distribution of resources. As a past Kodiak resident, I experienced scientifically sound board decisions first hand, and benefited from them. But in this instance, the data does not support the proposed changes. Take the Lisianski proposal, the hunter data shows that success rates for rural residents/federally qualified users (FQUs) is the best in the state. Given that success rate, the actual number of rural resident hunters has decreased. There is just no mathematical or scientific reason to support this change to limit access to non-federally qualified users (NFQUs). I fear cutting such huge swaths of land out for FQUs will concentrate NFQUs into a smaller area making overall deer management that much more difficult. I strongly oppose these proposals as a scientist and as a resource user. I have attached the ADFG comments which represents the best evidence to support my input. Thank you for your time and for the work you do to ensure that the best science is followed in these management decisions. I hope this comment reaches you before the July 19th deadline and can be considered in your decision along with the comments of my fellow Alaskans.

Very Respectfully,

Brooks Horan

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RnLWVOTgthNDQ1OjS04YjGxLWE0YzY0NW13MDNjZGAGAMZ...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wildlife proposal 22-08

Aaron Hulett <aaronthenurse@icloud.com>

Sat 7/17/2021 10:14 AM

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

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Regarding wildlife proposal 22-08 on Chichagoff island in Alaska I would like to voice my opposition. The numbers of deer on the island and harvest data do not support the claims made. This change would have a dramatic negative impact on non-federally qualified users and minimal or no positive effect for federally qualified users.

Thank you,

Aaron Hulett
1670 Mendenhall Peninsula Rd
Juneau, AK 99801
(360)460-4179

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWVOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNlZGAGAH%...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Opposition to WP22-07, WP22-08, WP22-09

Brandon Ivanowicz <bivanowicz@pndengineers.com>

Mon 7/19/2021 4:11 PM

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

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Attention: Theo Matuskowitz

The intent of this email is to be on record in my opposition to the following proposals:

- WP22-07
- WP22-08
- WP22-09

I support the views of the Territorial Sportsmen, Inc. of Juneau and the Alaska Department of Fish and Game in their opposition to these proposals. Please see the attachment. Thank you. Brandon Ivanowicz.

[There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters! - Territorial Sportsmen](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/d/AAQkADZINDE2MZRhLWVOTgINDQ1OS04YjQxLWE0YzY0NW13MDNjZQAQAFEP...> 1/1

7/21/2021

There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters! - Territorial Sportsmen

Navigation

Territorial Sportsmen

Representing the sporting lifestyle of Southeast Alaska

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There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters!

Posted on July 17, 2021 by territorialsport in Homepage

Comments on these are due by this Monday, July 19, 2021 (email: subsistence@fws.gov or fax: 907-786-3898).

The first proposal (WP22-07) is a closure of most of west Admiralty Island September 15 – November 30 for Juneau hunters. This includes all areas south of Hawk Inlet. Here are TSI's comments opposing that proposal (& supporting ADF&G):

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-07) to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort is also declining. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

TSI opposes this proposal and respectfully asks that it not be adopted.

<https://territorialsportsmen.org/there-are-three-federal-subsistence-wildlife-proposals-being-considered-that-will-affect-juneau-deer-hunters/>

1/4

7/21/2021

There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters! - Territorial Sportsmen

The second proposal (WP22-08) reduces the bag limit from 3 to 2 deer for the Northeast Chichagof Controlled Use Area (NECCUA – Hoonah & Tenakee areas). Here are TSI's comments opposing that proposal (& supporting ADF&G):

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-08) to reduce the deer hunting bag limit to 2 deer within the Northeast Chichagof Controlled Use Area (NECCUA) for non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on in NECCUA, ADF&G increased the annual bag limit from 4 to 6 deer west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort have remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer (compared to 3 deer for NFQUs). This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

TSI opposes this proposal and respectfully asks that it not be adopted.

The third proposal (WP22-09) is a closure of Lisianski Inlet, Lisianski Strait, & Stag Bay on Chichagof Island October 15 – December 31. Here are TSI's comments opposing that proposal (& supporting ADF&G):

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-09) to close deer hunting in Lisianski Inlet, Lisianski Strait, & Stag Bay on Chichagof Island from October 15 to December 31 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort has remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

<https://territorialsportsmen.org/there-are-three-federal-subsistence-wildlife-proposals-being-considered-that-will-affect-juneau-deer-hunters/>

2/4

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

Dear Federal Subsistence Board,

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

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

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

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

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

successfully harvest animals in each of these areas are often former federally qualified hunters who have moved to Juneau, but return home to help put up food for their families.

In each of these proposals, we also concur with Alaska Department of Fish and Game's detailed and well-researched position that the proposals' respective closures to non-federally qualified users are not warranted for conservation concerns. We therefore see these as allocative proposals, serving to limit opportunity for residents of our region.

We look forward to continuing to listen and to understand the concerns raised by federally qualified hunters, and we stand ready to create a forum to discuss ways to address these issues. Such a forum or open dialogue between users across the region would strengthen our shared interest in sustaining the strong connections to the land provided by traditions of hunting and fishing. We would also be happy to work with the Regional Advisory Committee to propose and champion changes through the Alaska Board of Game process that could alleviate some of the problems.

We urge you to maintain consistent access to deer hunting opportunity for residents of our sparsely populated region by voting no on these proposals.

Sincerely,

Juneau Douglas Advisory Committee

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wildlife proposals 22-07 through 22-09

Jones Chiropractic <akchiro@gmail.com>

Mon 7/19/2021 10:34 PM

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

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

Dear Federal Subsistence Board,

I have deer hunted Admiralty Island and Chichagof Island for the last 25 years. From my personal experience, I wholly agree with Alaska Department of Fish and Game's (ADF&G's) assessments on the following proposals.

I oppose the Wildlife proposal 22-07 that attempts to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). I wholly support ADF&G's comments opposing this proposal.

I agree with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty (highest in the State), ADF&G increased the annual bag limit from 4 to 6 in 2019. Additionally, total hunting effort is relatively light and hunter efforts and harvests have declined.

ADF&G concludes the actual reason for the decline of federally qualified user (FQU) deer harvests are from a decline in participation and effort by FQU's, NOT depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort is also declining. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQU's, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-07 and respectfully ask that it not be adopted.

I oppose Wildlife Proposal 22-08 that attempts to reduce the bag limit from 3 to 2 deer for the Northeast Chichagof Controlled Use Area (NECCUA).

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZiNDE2M2RhlWVOTgtNDQ1OjS04YjGxLWE0YzY0NWl3MDNjZGAGAJov...> 1/3

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

I agree with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer in NECCUA, ADF&G increased the annual bag limit from 4 to 6 west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.

ADF&G concludes that the actual reason for the decline of FQU deer harvests is from a decline in participation and effort by FQU's, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort have remained stable. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer, compared to 3 deer for NFQUs. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-08 and respectfully ask that it not be adopted.

I oppose Wildlife Proposal 22-09 that attempts a closure of Lisianski Inlet, Lisianski Strait, and Stag Bay of Chichagof Island October 15 to December 31.

I agree with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 in 2019. Additionally, total hunting effort is relatively light and hunter efforts and harvests have declined.

ADF&G concludes that the actual reason for the decline of FQU deer harvests is from a decline in participation and effort by FQU's, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort have remained stable. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-09 and respectfully ask that it not be adopted.

Warm Regards,

Resident Hunter of Alaska

--

Dr. Stefanie Jones



10004 Glacier Hwy
Suite B
Juneau, AK 99801

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RnLWVOTgtNDQ1OjS04YjQxLWE0YzY0NW13MDNjZGAGAJov...> 2/3

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP-22 07,08 and 09

David Keller <saltheart76@gmail.com>

Mon 7/19/2021 1:58 PM

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

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Good afternoon,

I am writing to you today to voice my opposition to proposed regulation changes WP-22 07, 08 and 09. I feel that the changes, if approved, would negatively affect hunters who do not qualify for subsistence permits.

Thank you for considering my comments.

Regards,

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWVOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZGAGAAj7...> 1/1

7/6/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22- (8,9,10) comment

elickirby@gmail.com <elickirby@gmail.com>

Sun 7/4/2021 11:00 AM

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

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Hopefully I got the numbers correct for the sections on the deer limits for the areas around pelican hoonah and angoon. I think a reduction in harvest limit like the one proposed in pelican will be more effective while also allowing people like myself(juneau resident) access and use of the forest. Even a reduction to 2 deer per season in these areas would cause a large reduction in the game taken while allowing us to still hunt. The area around the mainland of juneau receives a lot of pressure so the ability to hunt outside has a lot of value for people like me who primarily eat deer, bear, and moose throughout the year.

Thanks for your time and protection of the forests.

Sincerely

Elic Kirby

<https://outlook.office365.com/mail/subsistence@fws.gov/deepink?popoutv2=1&version=20210620001.07>

1/1

7/2/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Changes 22-07 22-08 and 22-09

Chris klawonn <chris.klawonn@gmail.com>

Fri 7/2/2021 7:18 AM

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

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Hello,

My name is Chris Klawonn, I live in Juneau and have been a resident in Juneau for a vast majority of my life. I plan on raising my children here, and I have loved the aspect of boating, fishing, and hunting my entire life. I'd like to keep this short and simple as I hope you are busy reading lots of comments on this topic. Closing the back side of admiralty to specifically Juneau residents is unnecessary, and would be costly and near impossible to regulate.

The number of Juneau residents hovers around 35,000, the total number of reported hunters in GMU 4 that reported a harvest in 2019 is 3,377 according to the ADF&G website. Let's assume that every single one of those harvests came from Juneau, which I know from friends and Facebook isn't the case, that's only 1 in 10 people that live in Juneau claiming deer on admiralty. I don't see this as anything near an issue effecting deer population on admiralty. Second, if this proposition did pass you'd need troopers to nearly constantly monitor the back side of admiralty to ensure that nobody is breaking the law. How many officers, boats, and planes would it take to find the few boats from Juneau to genuinely balance the manpower, equipment, and fuel costs.

Please understand, I realize the people's frustration of seeing pictures with a huge commercial fishing boat with 20 deer on the bow, and realize that this is a bit excessive on the taking of such a great resource. Even worse is hearing the wonton waste of deer or really any animals, on this island or in any other location. But to squarely place the blame for this on the residents of Juneau is wrong.

Admiralty island is 1,646.4 square miles, making it the 7th largest island in the United States. Cutting off half of it to one community of 3000 or so hunters isn't right, and I hope you can see my side.

Good luck with your decision and thank you for your time.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZiNDE2M2RhlUWOTgtNDQ1OjS04YjGxLWE0YzY0NW13MDNjZQAQAPZ1...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Object to Proposals

Jay/Amy Lloyd <jayamylloyd@gmail.com>

Mon 7/19/2021 12:28 PM

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

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I would like to submit my objection to proposals WP22-07, WP22-08 and WP22-09.

The abundance of the animals in the areas as stated by the Alaska Department of Fish and Games objection to the proposals does not warrant this action. Federally qualified hunters also have an extended season that they can hunt these areas. I do not feel that these proposals are necessary or required at this time.

Sincerely,
Jay Lloyd

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWVOTgtNDQ1OjS04YjQxLWE0YzY0NWl3MDNjZQAQALXs...> 1/1

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comments opposed to proposals WP22-07, WP-08, and WP-09

David Love <pandalid@yahoo.com>

Tue 7/13/2021 11:51 AM

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

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These comments concern Federal subsistence management program's Proposals WP22-07, WP22-08, and WP22-09.

As a hunter who lives in a non-subsistence area (Juneau) but uses sport hunting means to harvest wild game which is an essential source of protein for my annual sustenance, it is my observation (borne out by the ADF&G surveys) that there is not a conservation need to limit sport harvest of deer in any part of Unit 4, Southeast Alaska.

ADF&G Wildlife Conservation has many years of objective, quantitative data that shows that the deer populations in Unit 4 are not depleted, but are in fact at high and stable population levels, even after the heavy snow year of 2020/2021. Restrictions on non-subsistence hunters is not necessary and unfairly targets sport hunters whose numbers and hunt days are stable when NFQUs are declining. Also, the average number of deer harvested in Unit 4 has been stable for all users for 10+ years with good success rates in deer harvested. There is not increasing competition for deer among FQUs and NFQUs.

I urge the Federal Board to NOT support these proposals, and vote to oppose these proposals, since their claims are not true compared to the objective, quantified data showing strong population trends and stable deer harvest in Unit 4.

Thank you for your time, David Love, hunter and resident of Juneau

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/d/AAQkADZINDE2M2RhlWWOTgtNDQ1OjS04YjQxLWE0YzY0NWl3MDNjZQAQALz8...> 1/1

6/30/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Southeast proposed subsistence deer limitations

Charlie Martelle <martellec@yahoo.com>

Tue 6/29/2021 10:29 PM

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

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Hello,

I am writing about the proposed changes of wp-22 07, Wp-22 08, and wp-22 09. I am not in favor of limiting Juneau residents on these areas. I rely on wild game as my main source of protein. By limiting me and other residents of Juneau we will see an increase in the number of hunters in the areas that are not mentioned. This would mean it would be harder to get away from others and find the game we fill our freezers when we hunt closer to town.

We are already so limited in Juneau with hunting, one needs to either have a boat or charter a float plane to find "good" hunting. By dropping the limit on the road system in hoonah you would essentially take our one hunt that doesn't require owning a vessel or chartering.

From my experience on the coast there is abundant numbers of deer, same with the south west side of admiralty. If there was a shortage of animals I would be all for reducing bag limit, but I do not believe this is the case.

Again I am against any changes to the current regulations.

Thank you for your time
Charlie Martelle

[Sent from Yahoo Mail for iPhone](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/d/AAQkADZINDE2M2RhLWVOTgtNDQ1OS04YjQxLWE0YzY0NW13MDNlZQAGALNz...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Federal subsistence hunting and trapping regulations comment 2021

Sarah Matula <s_matula1@yahoo.com>

Mon 7/19/2021 1:14 PM

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

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Federal Subsistence Board Members,

I am writing to comment in respectful opposition to the regulatory actions proposed in WP22-07, WP22-08, WP22-09, WP22-10. I have been a resident of Juneau for 8 years, and have been lucky enough to have gained relationships with people through out SE. Through these relationships, I have had the opportunity to learn, experience, and put into practice in my own life the respect and appreciation for the substance lifestyle.

I would ask Federal Subsistence Board members to very carefully consider these proposals that significantly reduce available hunting areas to residents of Juneau. As you know, just because someone lives in a larger community like Juneau, does not mean they don't live a subsistence lifestyle and place great cultural, traditional, and personal value on a connection to the natural world that is based on procuring food for themselves, their family, and their community. The closures and bag limits reductions in these proposals would significantly impact traditional hunting use patterns for many people who live in Juneau and should only be enacted in extremely dire circumstances.

Thank you for your time-
Sarah Matula, Douglas, Alaska

<https://outlook.office365.com/mail/subsistence@fws.gov/inbould/AAGkADZINDE2M2RhLWwOTgtNDQ1OjS04YjQxLWE0YzY0NWl3MDNjZQAQAFPo...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP 22-07; WP 22-08; WP 22-09; WP 22-10

Grey Mitchell <fullcurl@live.com>

Wed 7/14/2021 9:04 AM

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

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Attr: Theo Matuskowitz, Office of Subsistence Management

I am writing to oppose the referenced federal subsistence proposals for deer in Southeast Alaska as listed above. These proposals have no basis, as there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. Without specific data to demonstrate a particular subsistence purpose, these proposals are not only arbitrary and capricious, but they will violate the constitutional rights of non-federally qualified users. The credibility of federal subsistence management of wildlife resources on public lands hinges on the use of scientific data. Not only do these proposals lack scientific data, they lack any data to demonstrate a justified subsistence need. I urge the rejection of these unsupported and unjust proposals. Thank you.

Grey Mitchell
Alaskan since 1966
3065 Douglas Highway
Juneau, Alaska 99801

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/d/AAQkADZINDE2M2RnLWwOTgtNDQ1OjS04YjQxLWE0YzY0NW13MDNjZQAQAAsa...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-07, WP22-08, WP22-09

Richard Morris <akreeldeal@gmail.com>

Mon 7/19/2021 8:40 AM

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

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Attention Teo Matuskowitz

Good day,

There are a few proposals that I am writing in opposition to.

The first is WP22-07, which proposes to close the western side of Admiralty from Hawk inlet to the southern tip to non-federal users to make it easier for one group to gather food. I also try to fill my freezer with wild game so this would be selecting them over me. Although I have never hunted the area due to its remoteness and difficulty to get to during the hunting season I feel it will be a stepping stone to closing more of the National Forest as they request larger areas to make it easier for them and more difficult for others. I would say that looking at the ADFG hunt records would show that the majority of hunt effort from Juneau is on the eastern side of Admiralty island and any that can make it to the proposed area would say that hunting there is so much more easy than the eastern side. It is all relative.

WP22-08 is looking to close the northern area of Chichagof island to non-federal users. I bought property in Freshwater bay for the main purpose of hunting. There are already regulations in place that have a harvest limit of 3 deer versus the 6 I could shoot anywhere else on the ABC islands. This is another remote area for someone from Juneau to access and has limited pressure from Juneau as could be found in the hunt records. The majority of deer that are harvested in the area are mainly road hunts as there is an abundance of logging roads throughout the area. As is the case with hunting, it can be challenging for those that don't get out into the forest and expect to fill their freezer shooting deer on the side of the road. Closing this area would impact the value of my cabin and experiences that come with having it there.

WP22-09 is looking to close other areas in the Hoonah area. Again, due to the remoteness this area does not get a lot of pressure from non-federal users.

In closing, these three proposals are trying to make harvesting deer a sure thing for the communities of Angoon and Hoonah. In hunting, there are no guarantees that you will see a deer, let alone harvest one. Closing these areas will only benefit a few, and probably only to a small degree. These

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

areas are in the Tongass National Forest, which is to be managed for all user groups. With these proposals it will start to be managed for the select few and I oppose it.

Thank you,

Rich Morris

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWWOTgtNDQ1OjS04YjGxLWE0YzY0NW13MDNjZQAGAN1n...> 2/2

7/2/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wildlife Proposal 22-07, 22-08, 22-09

Michael Nelson <michaelbn78@gmail.com>

Thu 7/1/2021 2:49 PM

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

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I am writing in opposition of these specific proposals, Wildlife Proposal 22-07, Wildlife Proposal 22-08 and Wildlife Proposal 22-09.

These proposals discriminate against Juneau residents unjustly. Excluding the small percentage of Juneau residents that have the ability to hunt in these areas will not increase subsistence means.

Michael Nelson
208-755-7618

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAGkADZINDE2M2RhlWWOTgtNDQ1OjS04YjQxLWE0YzY0NWl3MDNjZQAGABsq...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-08 comments

nicholasporr <nicholasporr@yahoo.com>

Sun 7/18/2021 11:34 AM

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

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I am writing to urge the board not to pass proposal WP22-08, which would reduce the bag limit to 2 deer for non-federally qualified hunters. There is no shortage of deer in the Hoonah area nor are non-federally qualified hunters displacing Hoonah hunters. I understand that last November was quite challenging for all hunters, though this is likely due to the ice storm that passed over northern southeast Alaska. In addition to being unnecessary for federally qualified hunters to meet their subsistence needs, this proposal will needlessly affect a number of cabin owners in Freshwater Bay. These hunters are typically not hunting the road system and are not placing any pressure on road system deer. For these reasons, I ask the board to not pass this proposal.

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7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Proposals 22-07,08,09,10

Tom Radandt <tomradandt0@gmail.com>

Fri 7/9/2021 2:52 PM

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

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There is no scientific evidence that supports the idea that non-Federally qualified users impact the success of qualified users. Therefore you must reject proposals 22-07, 22-08, 22-09 and 22-10.

To favor one group over another bases on any political characteristics is discrimination, which illegal.

Tom

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWWOTgtNDQ1OS04YjQxLWE0YzY0NW13MDNjZQAQAEgr...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals**Mark Sams <msams@pndengineers.com>**

Mon 7/19/2021 7:53 AM

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

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Attention: Teo Matuskowitz

I would like to make a few opposition comments on the below listed federal subsistence deer hunting proposals

WP22-07

I oppose this change to the deer hunting regulations on the Chatham straight side of Admiralty Island. The regulation will only isolate one user group which has a very low impact on the area due to the distance from Juneau. Due to the distance Juneau residence do not regularly access this area since it is more than 1.5-2hr run time. All other local communities are subsistence communities including, Petersburg, Kake, Tenekee, and Hoonah, leaving Juneau, the furthest community from the location a user group that would be isolated. I think it would be very easy to look at the hunting records collected by the state of Alaska every year to determine how much pressure Juneau actually has on the location to determine how much this change in regulations would actually effect the overall hunting pressure.

WP22-08

I oppose this change to the northern Chichagof Island since it again singles out a single user group. I currently Own a cabin on norther Chichagof Island but am a Juneau resident. This proposed change would limit my access to deer hunting at my cabin which I have invested heavily in over the past 5 years to use as a place to hunt. For me, the area is difficult to access from Juneau due to weather and distance, over 2hrs. Again if you look at hunting records, I believe you would find Juneau residences have a limited impact on the overall harvest on Norther Chichagof Island.

WP22-09

I oppose this change in regulations for closing deer hunting in Lisianski Inlet. This area is also very remote and very difficult for non-subsistence hunters, Juneau residence, to access. Hunting records should show that this area is seldomly access from Juneau this time of year due to weather so this proposal will have little effect on competition. The only residences this change will effect are from Juneau since access is limited to Pelican and Elfin Cove.

In general I believe instating restrictions that only effect one group is a poor decision that becomes a slippery slope for other communities to make similar requests. Pretty soon, Juneau would have very limited hunting locations in a National Forest that is supposed to be managed for all user groups. If subsistence user groups are having difficulty harvesting deer, maybe that's an indication that the bag limits for all groups are to high and a better proposal would be to limit all harvest verses a single user group that has low impact on all three proposed areas. Another option would be to limit the ability to proxy hunt. I know fishermen can go out and

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

get to these remote places in the winter and shoot more deer than their limit due to proxy hunting. I understand the need for it in certain instances, but maybe limiting the number of proxy tags allowed to hunt at one time would help spread the pressure out over a longer period and less deer would be harvested. This would reduce the overall pressure and competition for sub-subsistence harvesters.

Historically these areas being proposed, as all deer habitat, is far more effected by weather and old growth timber harvests (heavy snow and large scale timber clear cuts) than the limited number of hunters. When these environmental and man-made (timber harvest) factors affect the population, all hunters are effected equally.

These proposed changes will also hurt any non-resident hunting charters that are based out of these local communities, hurting the local economies. Non-resident hunters will bring a large boost to these small communities at the end of the typical tourist season helping fortify the community with funds to weather the winter. Out of town hunters will not use Angoon based on the proposed WP22-07 since they would be very limited in hunting locations.

Thank you for taking the time to read my comments.

Mark Sams

Owner of Cabin in Freshwater Bay, Directly effected by 2 out of three of these proposed changes.

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Opposition of Federal subsistence proposals Southeast Alaska for deer WP 2207, wp2208, wp2209, wp2210, wp 2212

CHARLES SCHULTZ <cjs16@me.com>

Sun 7/18/2021 3:53 PM

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

Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

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Attention Theo Matuskowitz,
Office of Subsistence Management

I am writing to oppose the federal subsistence proposals that affect Southeast Alaska Deer hunting. I oppose WP2207, WP22-08, WP22-09, WP22-10, and WP22-12. Proposals WP22-07, WP 22-08, WP22-09 and prevents non-qualified subsistence users from access to deer hunting on public lands. As an Alaskan resident I also rely on deer meat as a primary source of red meat that is locally available. Limiting non-qualified subsistence users from access to hunt deer in areas around Angoon, Hoonah and Pelican is entirely unfair to those who live in other areas of the state, who are non-qualified Subsistence hunters. There is no science to suggest that the over harvest of deer is related to non-qualified subsistence users, in fact I would suggest that the over harvest in the areas around Hoonah, Angoon, and Pelican may actually be from the subsistence users who may be killing every available deer seen in late season, on the beach and uncaring if the deer is antlerless and uncaring of size. Preservation of breeding antlerless deer may prove to allow fawn bearing deer an opportunity to give birth in the spring. Also education of subsistence hunters to harvest mature deer would improve the size of deer and thereby increase the available pounds of edible meat.

Extending the season in unit 6 is exactly a dichotomy of what the Subsistence Board may be wanting to achieve. The complaint of less harvestable deer will only be compounded if deer seasons are extended during their most vulnerable times. Then the subsistence deer harvest will continue to over extend the available deer to breed for next year, and likely they will complain that non-subsistence harvest is the blame.

Hunters of deer need equal access to public lands. We are all Alaskans trying to provide natural, local deer meat.

Please take the comments of non-subsistence hunters into consideration. Also consider making all Alaskans subsistence users. We all live here. We all have subsistence needs, not based on size of community we live in.

Thanks for your consideration,
Charles Schultz
Juneau, Alaska

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RnLWwOTgtNDQ1OjS04YjQxLWE0YzY0NW13MDNjZGAGAD6p...> 1/2

SCI Alaska Chapter
 Eagle River, Alaska 99577
 Cell (907) 903-8329
 Tel: (907) 980-9018
www.ak.safariclub.org



July 19, 2021

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

[Electronic Submission]
subsistence@fws.gov

RE: SCT-AK comments on Wildlife Proposal 22-08 Hoonah

Dear Chairman Matuskowitz,

The Safari Club International Alaska Chapter (SCI-AK) writes in opposition to Wildlife Proposal 22-08 (WP22-08). Founded in 1971, Safari Club International is the country's leading hunter rights advocate and additionally promotes worldwide wildlife conservation. SCI-AK is nationally and internationally recognized for its contributions in support of SCI's four major mission areas: Advocacy, Conservation, Education, and Humanitarian Services.

WP22-08 is counter to our goal of ensuring fair and equitable access to game resources in Alaska. The below comments focus on the indices of deer abundance, deer hunter effort, and harvest in Alaska Game Management Unit 4 (GMU 4) as reasons to reject WP22-08.

The proposal claims that non-federally qualified users (NFQU) are unfairly competing with federally qualified users (FQU) when hunting Sitka black-tailed deer in GMU 4. WP22-08 asserts that the deer population on western Admiralty Island is depleted and that in recent years FQUs have had difficulty meeting their subsistence needs because of increasing competition from NFQUs. Alaska Department of Fish and Game (ADF&G) analysis of deer population, hunter effort, and harvest trends found no support for either contention. Instead, the available indicators support that deer remain abundant throughout GMU 4.

GMU 4 encompasses the ABC Islands (Admiralty, Baranof, and Chichagof) and the surrounding archipelago. Hunters residing in Southeast Alaska (GMUs 1-5), excluding Juneau and Ketchikan, are eligible to harvest deer in GMU 4 under federal subsistence regulations. The current federal deer season for this area is August 1 to January 31 with a bag limit of 6 deer (bucks only August 1 – September 14). The current State season is August 1 to December 31 with a bag limit of 6 deer (bucks only August 1 – September 14). In 2019, the Alaska Board of Game increased the deer bag limit in GMU 4 from 4 to 6 deer because of the GMU's uniquely healthy population of Sitka black-tailed deer.

GMU 4 consistently shows a high black-tailed population. Pellet group counts are usually well above the high-density threshold and are often double the counts in other GMUs. Aerial surveys — measured in deer/hour sighted — were conducted for two locations in GMU 4, Southern Admiralty Island (2015-2017) and Northeast Chichagof Island (2017-2018). Southern Admiralty had the highest deer/hour of any survey area in Southeast Alaska and estimates from Northeast Chichagof were similar to Prince of Wales Island (POW) and higher than all other survey areas except Southern Admiralty and POW.

Management biologists in GMU 4 began conducting beach mortality transects in the early 1990s. Although these mortality surveys are a relatively insensitive indicator of population trend, they are an indicator of mortality resulting from severe

*Safari Club International Alaska Chapter
 First for Hunters - First for Wildlife*

winters. The winter of 2006/2007 was the most severe on record, and in some parts of GMU 4 managers estimated up to 75% of deer died. Yet, based on harvest and other indicators of deer abundance, managers believe the deer population had fully recovered by the 2013 season.

GMU 4 Sitka black-tailed deer are usually above the high-density threshold and are often double the counts in other GMUs. Although the area affected by this proposal is rarely sampled, this broad index of deer abundance suggests the GMU 4 population remains at high levels with no indication of depleted populations or conservation concerns. Taken together, these indices of deer abundance — pellet group surveys, alpine counts, mortality transects — suggest this proposal cannot be based entirely on a conservation concern.

Overhunting is often used as a justification for area closures or implementation of restrictive conservation measures. ADF&G produces estimates for hunter effort and harvest using information provided by hunters. To hunt deer in Southeast Alaska all hunters must obtain harvest tickets. Since 2011 harvest tickets have come with a mandatory reporting requirement. From 1997-2019 the estimated average annual harvest in GMU 4 has been 5,725 deer taken by 3,282 hunters. GMU 4 supports the highest deer harvest in the state and the historical harvest has remained fairly stable with between 5,000-7,000 deer harvested annually. The exception being the severe winter of 2006/2007 when high harvest was followed by significant overwinter mortality of deer throughout GMU 4. This resulted in a precipitous decline in harvest from 7,900 deer in 2006 to 1,932 deer in 2007.

Long-term records indicate a declining trend in harvest for both FQUs and NFQUs. From 1997 to 2006, FQUs harvested on average 152 deer annually. Since 2013, FQUs have harvested an average of 49 deer annually. This represents an approximate 70% decline. There is a similar pattern for NFQUs, who averaged 349 deer annually from 1997-2006. Since 2013, that average has declined to 115 deer annually. SCI-AK notes hunter numbers are decreasing across the board on a national level, not just in Alaska or even GMU 4. This proposal will further restrict access for hunters and lead to a further decrease in the number of hunters in one of the state's most viable hunting regions.

The Alaska Board of Game has also established an annual amount reasonably necessary for subsistence (ANS) for deer in GMU 4 of 5,200-6,000 deer. ANS differs from the undefined term "subsistence need" used in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Under Alaska law, ANS is the harvestable portion of a game population that is sufficient to provide a reasonable opportunity for subsistence uses. "Reasonable opportunity" is that which allows a normally diligent hunter a reasonable expectation of success. The board establishes an ANS for a game population through review of long-term population and harvest information. With deer harvest levels within the recommended ANS range, the argument that the closure needs to occur in order to benefit ANS users is moot.

SCI-AK members are especially supportive of family hunting traditions because learning to hunt starts with family and community mentors. FCU status is not inherited. Children who leave federally qualified communities to attend school elsewhere will be excluded and harmed by WP22-08. In November, many FCUs invite their family members home for peak season deer hunts. Other NFQUs return to traditional hunting areas to harvest deer on state hunting proxies or kill deer on their limit to share with family, friends, or elders. None of this use would be allowed to continue in the WP22-08 area if it is passed.

Based on the information provided to ADF&G by GMU 4 deer hunters, population indices, anecdotal reports by local hunters, and field observations by management biologists, the department has concluded that there is no conservation concern for the GMU 4 deer population. With deer population remaining high and stable, harvest within its historical range, and state ANS requirements being met it is unnecessary to restrict hunting in GMU 4 to the benefit of a small handful of users. WP22-08 will reduce the amount of deer meat coming into communities while simultaneously failing to provide conservation benefits to an already healthy deer population. SCI-AK urges you to not adopt WP22-08.

Thank you for your consideration.

John Sturgeon
SCI Alaska Chapter President
 E-mail: president@aksafariclub.org
 Cell: (907) 230-0072

*Safari Club International Alaska Chapter
 First for Hunters - First for Wildlife*

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wp22-08 wp22-07

Isalah Sipniewski <stansipak@gmail.com>

Thu 7/15/2021 8:09 AM

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

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Hello,

I'm writing this email in regards to the recent proposals for restrictions on harvesting deer in the above subject line.

As a Juneau resident of 20 years I have enjoyed hunting these areas on Chichicoff Island and the south end of Admiralty Island.

I have a family cabin on Admiralty at the southern end where dating back as far as my wife's grandfather, has used for hunting deer.

There is no decline in deer population and no reason why this area should be restricted to Juneau hunters. There are more than enough deer for those who choose to "break suction from their truck or boat seat" and hike to find deer.

I have family in Hoonah who I have enjoyed staying with and hiking the mountains together. Taking my sons and teaching them how to navigate the mountains. On the road systems in Hoonah I have enjoyed hiking to my favorite spots for as long as I've lived in Alaska.

I see no good reason why any of the 3 proposals should even be on the table.

If people are complaining of not enough deer it is due to their own laziness and unwillingness to hike into the woods for deer. There are more than enough for the surrounding residents and residents of Juneau.

Thank you for taking my comments into consideration.

Stanley sipniewski

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7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Subsistence Hunting Closure

Peter Strow <pstrow@hotmail.com>

Mon 7/19/2021 5:20 PM

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

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Hello,

I would like to submit a comment regarding the closure of hunting to Juneau residents for WP22-07, WP22-08 and WP22-09. I don't believe these areas should be closed to Juneau hunters. Accessible hunting is difficult in Southeast Alaska and many Juneau residents depend hunting deer in these areas. Proposing these closings should be backed by scientific data and I think this needs to be further studied before any closures are passed.

Thank you,
Peter Strow

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWWOTgtNDQ1OjS04YjQxLWE0YzY0NWl3MDNjZQAQAE3q...> 1/1



July 16, 2021

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

RE: Comments on WP22-07 Closure to non-Federally qualified users, Admiralty Island; WP22-08 Place a harvest restriction on non-Federally qualified users, Northeast Chichagof Controlled Use Area; WP22-09 Closure to non-Federally qualified users, Lisianski Strait; WP22-10 Lower harvest limits for non-Federally qualified users, Lisianski Strait;

Dear members of the Federal Subsistence Board:

The Sportsmen's Alliance is a leading national organization that defends the right of our members to hunt, fish and trap in all 50 states. I am writing today to urge you to use sound scientific evidence to discharge policy related to changing existing hunting seasons, harvest limits and methods and means of taking wildlife related to federal subsistence hunting and trapping and more specifically proposals WP22-07, WP22-08, WP22-09 and WP22-10.

The Sportsmen's Alliance strongly believes that if populations are abundant than all public land users in the Alaska should have access to these lands for hunting and trapping. These lands are managed and conserved using public funds contributed by sportsmen across Alaska and the United States through license fees and excise taxes paid on the purchase of firearms and other hunting equipment.

When determining whether to close certain federal lands to land users that are non-subsistence hunters, the Alliance on behalf of our Alaska members urge you to follow scientific evidence and population data to determine the best course of action. If wildlife populations numbers indicate abundant numbers of game species these lands should remain open to both subsistence hunters and non-subsistence hunters. The North American Model of Wildlife Conservation dictates that science should be the guiding tool for discharging wildlife policy and our membership stands firmly on the principles of this model.

We understand the complex nature of this decision, so we urge you to make these determinations based solely on science and not based on political or social pressure. Thank you for the opportunity to comment on this issue and thank you for your time.

Best,

Jacob Hupp
Sportsmen's Alliance
Associate Director of State Services

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

Dillon Tomaro <dillonpaultomaro@gmail.com>

Mon 7/19/2021 9:06 AM

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

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I would like to make a few opposition comments on the below listed federal subsistence deer hunting proposals

WP22-07

I oppose this proposed change to the 2022 regulations. I have been hunting south of Hawk Inlet towards and beyond Angoon my whole life and I have not witnessed any decrease in deer population other than the years following an excessive amount of snow that caused the yearlings to die. I have had nothing but pleasant encounters with the hunters of Angoon and they always seem to kill more deer than us at ease with their local knowledge (same concept that I would have a better knowledge of the landscape, and therefore the upper hand with hunting in the Barlow area). That is some of my favorite hunting territory with all of the old growth that you cannot find north of Hawk Inlet. I also enjoy hunting Florence Lake which would be affected by this proposal. Rarely do I encounter other hunters from Juneau when I am hunting South of Hawk Inlet and I believe this should be easy to see by looking at peoples hunting reports. I do not think that the Juneau residents' impact on the deer population south of Hawk inlet is significant at all and there is no way that it is hurting the Angoon residents' harvest needs. If this proposal goes through then to be fair, the Angoon residents should not be able to hunt north of Hawk Inlet (even though it is the same case that their hunting has no impact on Juneau residents deer population). There has been no problem in the past with Juneau residents affecting the Angoon residents hunting opportunity and I believe it is simply unfair to go through with this proposal.

WP22-08

I oppose this proposed change to the 2022 regulations. I believe that again the Juneau resident impact is very low in this area.

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

Thank you for taking the time to read my comments.

Dillon Tomaro

Lifelong Southeast Alaska Hunter

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWWOTgtNDQ1OS04YjQxLWE0YzY0NW13MDNjZQAQAF0R...> 2/2

6/30/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comment on WP22-08, WP22-09, WP22-07

John Unzicker <jmunzicker@gmail.com>

Wed 6/30/2021 8:56 AM

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

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Hello,

This comment is regarding the following proposals:
WP22-08, WP22-09, WP22-07

We are all Alaska state residents and have the right to utilize all of the state land regardless of our primary residence. As a lifelong Juneau resident who pays the same fees to hunt game in SE AK as anyone else in the state, I am extremely discouraged by these proposals.

Juneauites would be forced out of major hunting areas during the prime time of the season. If Juneau residents are not allowed to hunt the far, outlying areas, we will all be forced to hunt the immediate areas around Juneau which will result in over-hunting, overcrowding, and less game around Juneau. This proposal is absolutely inequitable and will divide communities.

What about hunters who have cabins or family in Hoonah, Pelican, or Angoon? This is absolutely wrong and only goes to serve a very small population of the state. Residents of Juneau have just as much right to hunt these zones as the residents of Hoonah, Pelican, and Angoon have the right to hunt anywhere in the state. There is enough wildlife and land for everyone to utilize for subsistence and it should be shared equally.

And does this mean that any other resident not from Juneau can hunt these areas? Sitka? Haines? Gustavus? Petersburg? Why only Juneau?

Thank you,
John Unzicker
2016 Glacier Bear Blvd.
Juneau, AK. 99801
907-723-3191

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7/1/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] proposals WP22-7, WP22-8 and WP22-9

Luke Woodruff <alaskan_waters@yahoo.com>

Wed 6/30/2021 9:23 PM

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

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Please do not consider the new proposals WP22-7, WP22-8 and WP22-9 as new regulation. I do not believe the current deer harvest levels combined with predation/winter kills deem this kind of proposal necessary. Subsistence and non subsistence communities alike count on deer as a part of their diet along with fish, water fowl and berries. Every year is different, sometimes hunting is difficult and other times not. Let's avoid creating regulations that favor one group over another because one group thinks they are having to work harder.

Luke Woodruff
Juneau, AK

[Sent from Yahoo Mail for iPhone](#)

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-09

greg-donica@gci.net <greg-donica@gci.net>

Mon 7/19/2021 12:06 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>; deanna.perry@usda.gov <deanna.perry@usda.gov>

Cc: Norm and Linda Carson <nrcarson@att.net>

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To Southeast Subsistence Regional Advisory Council:

There have been many personal discussions lately on deer hunting in Lisianski Inlet and Pelican area. Almost to the point of "Hatfield & McCoys" situation.

It seems pretty simple to me. Alaska Fish & Game has done a good job of managing the hunting of deer. The rules and regulations in place are reasonable, practical and effective. Abide by them. Until there is obvious and proven data to verify a severe reduction in deer population, leave it as it is.

ALL hunters should use good judgement when hunting, doing so in a safe manner. They should be aware of and respect personal property, be it a year around residence or a cabin. Don't hunt so near.

There are times when bears are in abundance and their food sources are not. Extreme fall & winter weather can also contribute to more deer being taken by bears. And yet, data does not support any reduction in deer population, due to bears or hunters. Should that ever happen, then cut the limit of deer to be taken. If a hunter knows he/she will not use the amount of deer allowed, take less.

My husband has hunted in this area with other family members who live in Pelican, our son-in-law as well. We have been property owners in Pelican for twenty years. Generations of families still hunt there and hope to continue to do so. They may not be FQU. For some reason, that has been a topic that is causing those who are and those who are not, to be divided and confrontational. Is that really necessary?

Be a legal and responsible hunter.

Please consider this an opposition to WP22-09, and also WP22-07, WP22-08, & Wb22-10.

Thank you,
Greg & Donica Jerue
PO Box 211434
Auke Bay, Ak. 99821

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] opposition to all federal deer subsistence proposals. WP2207 -- Wp2212

RICHARD HARRIS <RHDevelopment@gci.net>

Thu 7/15/2021 12:38 PM

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

Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

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Attn: Theo Matuskowitz,
Office of Subsistence Management
Regarding : Federal deer subsistence proposals Region-1 Southeast Alaska
Proposal Numbers: WP2207, WP2208, WP2209, WP2210, WP2212

As a lifelong deer hunter of Southeast Alaska I am writing to oppose the federal subsistence proposals for deer harvesting in Southeast Alaska. I have hunted some of these areas my entire life, access to the areas listed is very difficult, needing good weather and much planning, I believe the weather controls much of the hunting pressure from non-federally qualified users in these areas(somewhat self regulating). I could understand supporting a lower per hunter harvest number in some areas, but shutting these areas down entirely during the period of Oct. 15 - Dec. 31, to non-federally qualified hunters is not acceptable. Limiting hunting to any months other than Oct. 15 - Dec. 31 should be considered a complete shut down as this is the only period a hunter can actually hunt and experience the calling of a deer, during the rutting season. Any regulation changes made should include some changes to the federally qualified user as well, not all but some are doing as much damage to the resource with immediate access and extended hunt seasons as the non-federally qualified user who has limited access and shorter harvest seasons. Also as I understand these proposals have no basis, there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. I hope you will take these comments into consideration and reject these proposals.

Thank you,

Richard Harris
P.O. Box 32403
Juneau, Alaska 99803

Richard Harris

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