

<b>WP22-09/10 Executive Summary</b>	
<b>General Description</b>	<p>Wildlife Proposal WP22-09 requests that Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) be closed to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council</i></p> <p>Wildlife Proposal WP22-10 requests that the deer harvest limit for non-Federally qualified users in Lisianski Inlet and Lisianski Strait be reduced to 4 deer. <i>Submitted by: Patricia Phillips</i></p>
<b>Proposed Regulation</b>	<p><u>WP22-04</u></p> <p><b>Unit 04—Deer</b></p> <p><i>Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31. Aug. 1 - Jan. 31</i></p> <p><i>Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) are closed to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users hunting under these regulations. July 1- June 30</i></p>
	<p><u>WP22-10</u></p> <p><b>Unit 4—Deer</b></p> <p><i>Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31. Aug. 1 - Jan. 31</i></p> <p><i>Non-Federally qualified users may harvest up to 4 deer in Lisianski Strait and Lisianski inlet</i></p>
<b>OSM Conclusion</b>	<b>Oppose</b> Proposal WP22-09 and Proposal WP22-10

<b>WP22-09/10 Executive Summary</b>	
<b>Southeast Alaska Subsistence Regional Advisory Council Recommendation</b>	<p><b>Oppose</b> WP22-09</p> <p><b>Support</b> WP22-10 <b>with modification</b> to the area and harvest limit restrictions on non-Federally qualified users.</p> <p>The modified regulation should read:</p> <p><b>Unit 4—Deer</b></p> <p><i>Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31.</i> <span style="float: right;"><i>Aug. 1 - Jan. 31</i></span></p> <p><b><i>On Federal public lands within drainages flowing into Lisianski Inlet, Lisianski Strait, and Stag Bay south of a line connecting Soapstone and Column points and north of a line connecting Point Theodore and Point Uray, non-Federally qualified users may harvest up to 3 bucks.</i></b></p>
<b>Interagency Staff Committee Comments</b>	<p>The ISC acknowledges the extensive discussion by the Council members about the closure policy application to this situation. 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 WP22-09 closing this area because of concerns brought to them by the affected Federally qualified subsistence users in Pelican about not meeting subsistence needs for deer. WP22-10 was submitted by a resident of Pelican, who is also a member of the Pelican Fish and Game Advisory Committee, who also supported WP22-10. The proposal review process allowed the Council and the public to review the available data and provide testimony from all affected users of the resources. During the meeting, the Council 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 crafted a modification of WP22-10 to only reduce the harvest limit to 3 bucks for non-Federally qualified users rather than a closure. The Council felt this modification would address the concerns expressed by local residents.</p>
<b>ADF&amp;G Comments</b>	<b>Oppose</b> Proposal WP22-09 and Proposal WP22-10
<b>Written Public Comments</b>	<b>63 Oppose, 1 Neutral</b>

## STAFF ANALYSIS WP22-09/10

### ISSUES

Wildlife Proposal WP20-09, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests that Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) be closed to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users.

Wildlife Proposal WP22-10, submitted by Patricia Phillips of Pelican, requests that the deer harvest limit for non-Federally qualified users in Lisianski Inlet and Lisianski Strait be reduced to 4 deer.

### DISCUSSION

The proponent of WP22-09 states that it recently became more challenging for Federally qualified subsistence users in Lisianski Inlet, Lisianski Strait and Stag Bay to harvest sufficient deer for their 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.

The proponent of WP22-10 states that hunting pressure from non-Federally qualified users results in Federally qualified subsistence users' deer needs not being met. The proponent further contends that bear predation on deer populations have deer staying out of the beach fringe, which makes deer skittish when there is ongoing deer hunting pressure.

### Existing 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*

### Proposed Federal Regulation

#### WP22-09

#### Unit 4 - Deer

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

**Unit 4 - Deer**

*Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) are closed to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users hunting under these regulations.*

WP22-10**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 may harvest up to 4 deer in Lisianski Strait and Lisianski inlet*

**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>

*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.

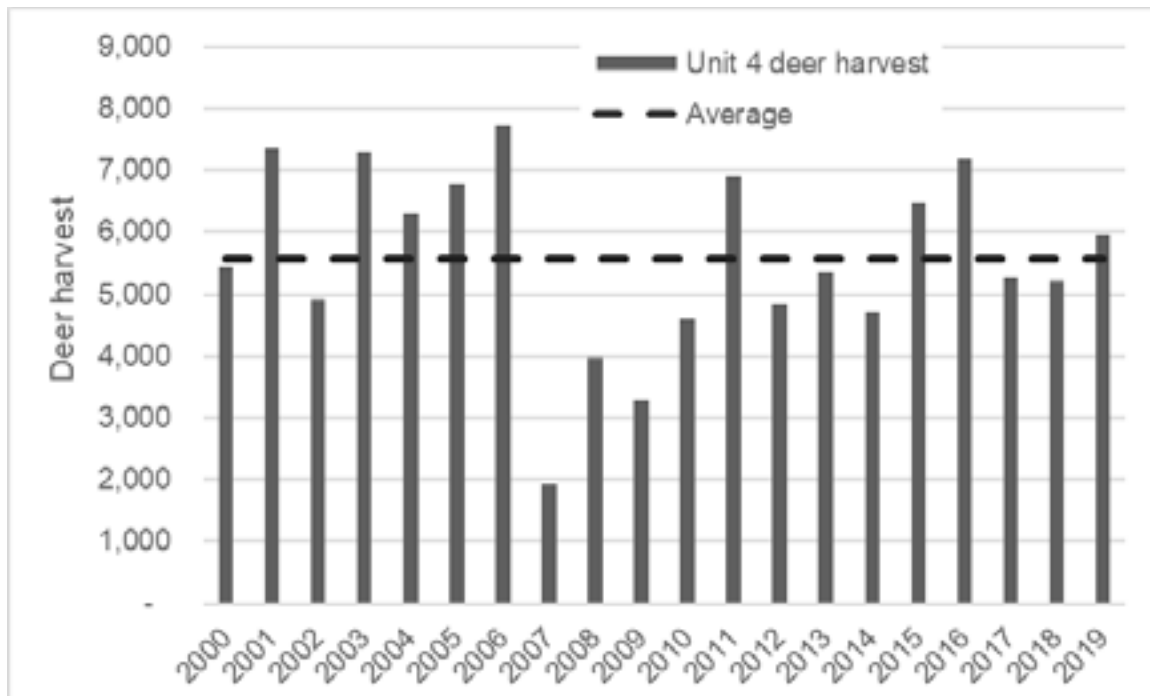
### **Habitat**

See WP22-07 analysis.

### **Population Information**

McCoy (2017) outlines the limitations of estimating deer populations in Southeast Alaska, 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) explains that Unit 4 deer pellet-group counts in 2019 were higher than previous counts in all three survey areas. Pavlov Harbor, on northeast Chichagof Island, was surveyed in 2019. Results indicated 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, 2000-2019, was 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 been increasing 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.

### 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 sampled each year and while response rates vary by community, the overall response rate across communities is approximately 60% each year. Harvest numbers are extrapolated using expansion factors that are 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 harvest change. Since 2011, harvest data have been gathered through mandatory reporting. ADF&G expands the harvest estimate based on returned reports 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 per year. 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 WP22-09/10 relative to Unit 4 is shown in **Map 1**. The harvest data presented is specific to wildlife analysis areas (WAA) encompassing, but not limited to, the area of Lisianski Inlet, Lisianski Strait, and Stag Bay (**Map 2**). Deer harvest information at a finer scale is not available, however data for WAAs in **Map 2** should sufficiently convey harvest and effort trends in the proposal analysis area.

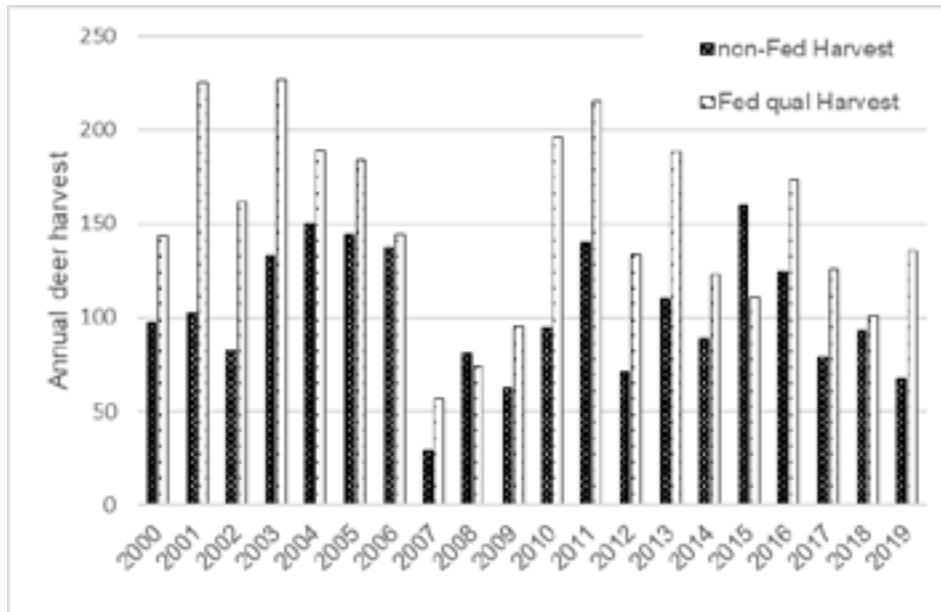


**Map 1.** Unit 4 management map with proposal analysis area encircled in red.

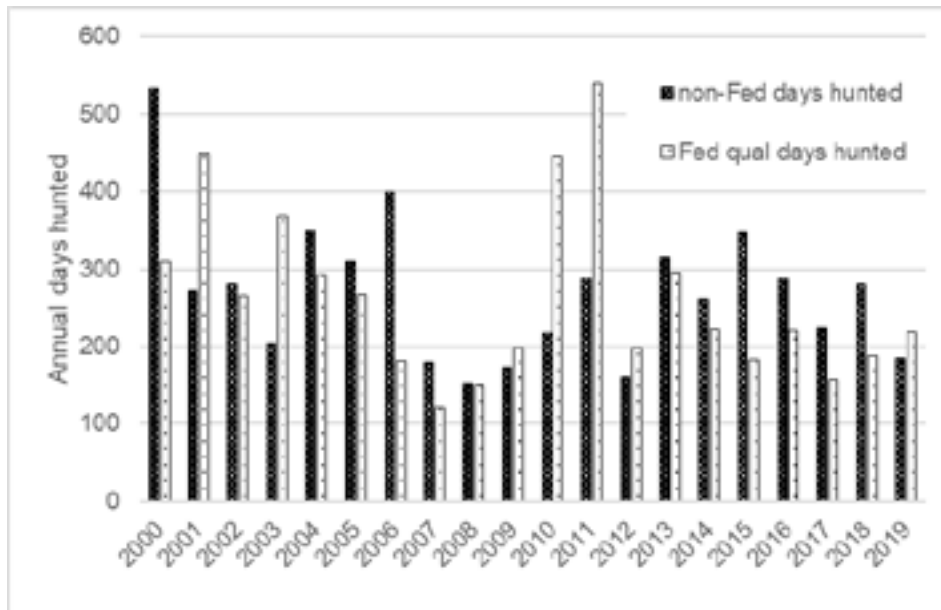


**Map 2.** Wildlife analysis areas used for harvest and effort data analysis.

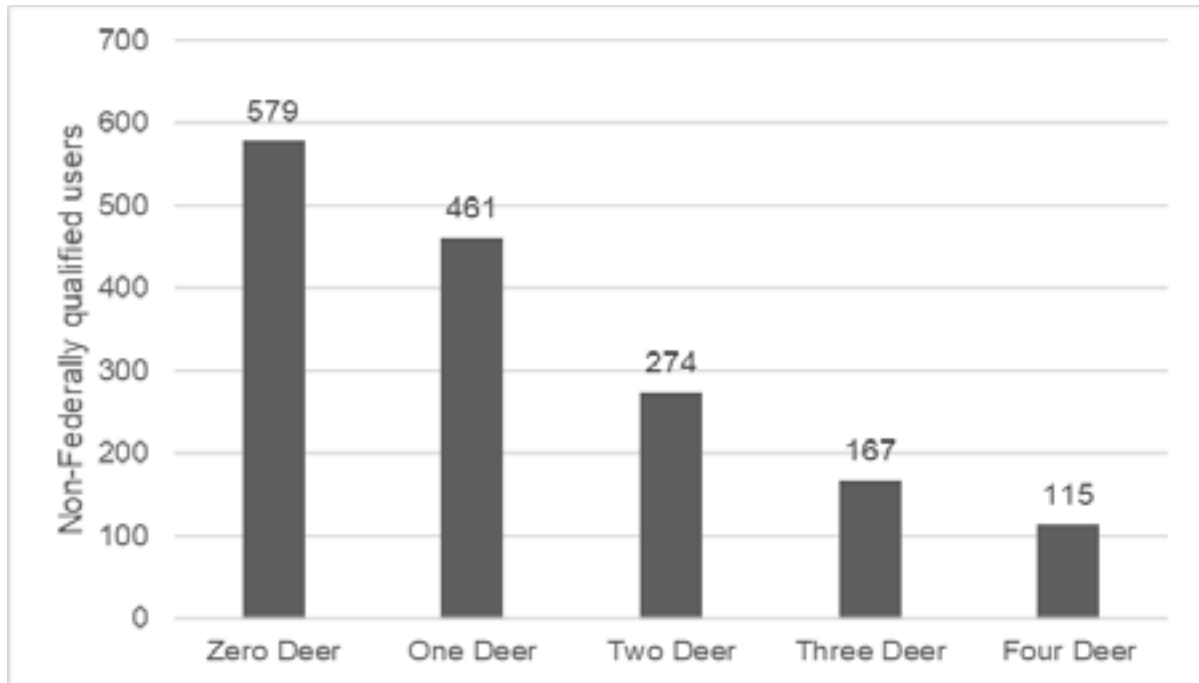
Harvest and effort by Federally qualified subsistence users and non-Federally qualified users in the relevant WAAs is presented in **Figures 2 and 3** below. Federally qualified harvest is consistently higher compared to other users (**Figure 2**) while effort, expressed in hunter days, is generally lower (**Figure 3**). Non-Federally qualified users have a lower success rate, which results in higher hunting effort compared to Federally qualified subsistence users. Both harvest and effort appear to be fairly stable since 2011 when mandatory harvest reporting was implemented. Ninety-three percent of non-Federally qualified users harvest less than 4 deer annually from Unit 4 (**Figure 4**).



**Figure 2.** Annual deer harvest in the proposal analysis area, 2000-2019 (ADF&G unpublished data).

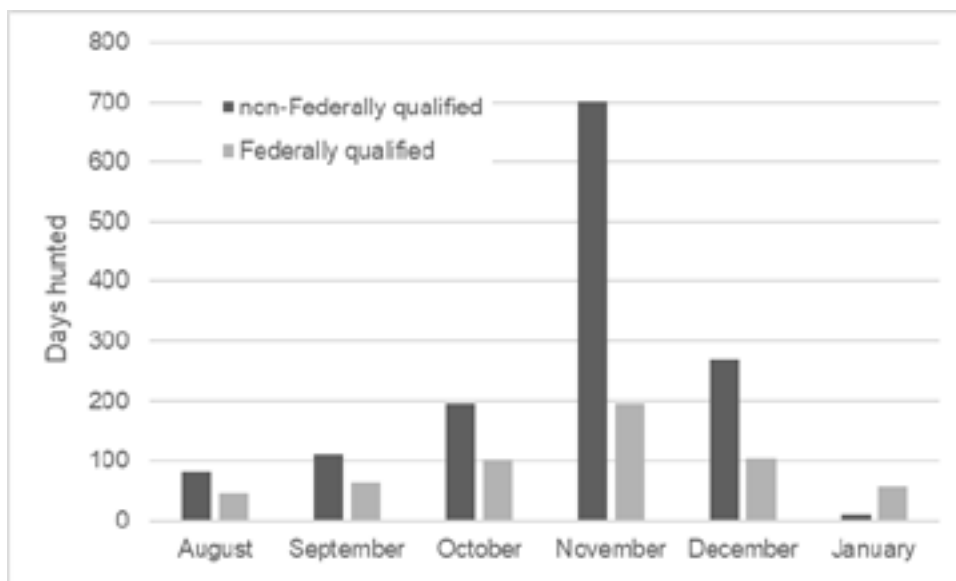


**Figure 3.** Annual hunter days in the proposal analysis area, 2000-2019 (ADF&G unpublished data).



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

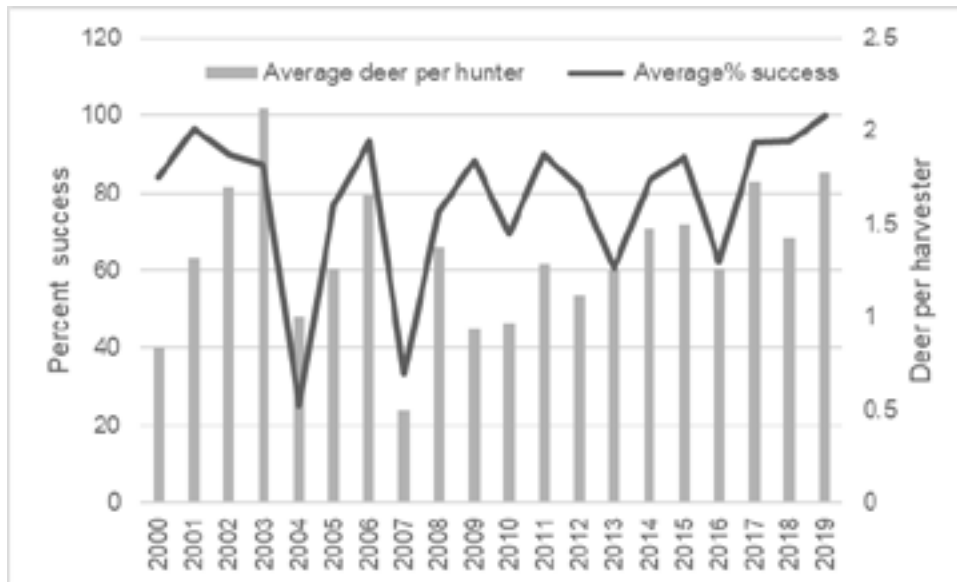
The chronology of deer hunting effort in all of Unit 4 is probably similar to effort in the proposal analysis area, varying by user group. November is the most popular hunting month for both groups, particularly for non-Federally qualified users (**Figure 5**).



**Figure 5.** Average number of days hunted by month 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

number of animals is harvested on a single hunt. The success rate in November for residents of Pelican has been 86% or higher since 2014, and the annual success rate has been 93% or higher since 2017. The number of deer harvested per hunter has been trending up since 2009 (**Figure 6**).



**Figure 6.** Hunter success rate and deer harvested per hunter for Pelican residents hunting in Unit 4, 2000-2019 (AD-F&G unpublished data).

### Effects of the Proposal

These proposals would restrict non-Federally qualified users from hunting deer in portions of Lisianski Inlet, Lisianski Strait and all of Stag Bay. Restricting non-Federally qualified users could decrease overall deer harvest and reduce competition with Federally qualified subsistence users in the area. Lower harvest and reduced competition may lead to more favorable hunting conditions for Federally qualified subsistence users. Non-Federally qualified users may shift some deer hunting effort to other areas of Unit 4, possibly displacing other hunters.

## OSM CONCLUSION

**Oppose** Proposals WP22-09/10.

### 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 deer hunting in the analysis area for non-Federally qualified users does not appear necessary for conservation because deer populations in Unit 4 are high and may be approaching carrying capacity in some locations.

Hunting effort in Unit 4 by non-Federally qualified users is highest in November and to a lesser extent in December. This could be evidence that increased competition during this time may be a factor affecting Federally qualified subsistence users' needs being met. However, the success rate in November for residents of Pelican has been 86% or higher since 2014 and annual success rate has been 93% or higher since 2017. The number of deer harvested per hunter has been trending up since 2009. Thus, a partial season closure to non-Federally qualified users in the proposal area does not appear necessary to continue subsistence uses.

Very few non-Federally qualified hunters harvest more than 3 deer annually in Unit 4, so restricting them to 4 deer annually would not significantly affect harvest or effort by non-Federally qualified users or the hunting experience of Federally qualified subsistence users. Lowering the harvest limit for non-Federally qualified users does not appear necessary to continue subsistence uses.

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## SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

### Southeast Alaska Subsistence Regional Advisory Council

**Oppose** WP22-09. The Council felt the issue of hunting competition in this area would be better addressed through a harvest limit restriction. A closure is not necessary for the continuation of subsistence uses and there is not a conservation concern for deer. This proposal is not supported by a majority of Pelican residents and the needs of the community can be better met by proposal WP22-10.

**Support** Proposal WP22-10 **with modification** to the area and harvest limit restrictions on non-Federally qualified users.

The modified regulation should read:

#### Unit 4 - Deer

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

*On Federal public lands within drainages flowing into Lisianski Inlet, Lisianski Strait, and Stag Bay south of a line connecting Soapstone and Column points and north of a line connecting Point Theodore and Point Uray, non-Federally qualified users may harvest up to 3 bucks.*

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. It benefits Federally qualified subsistence users because it reduces the harvest limit and restricts the harvest to bucks only for non-Federally qualified users, which reserves does for Federally qualified users. There are concerns that residents are not meeting their subsistence needs for deer. Predators are focused more on deer because of recent failed fish runs and warm winters. Limiting non-Federally qualified users to three bucks would not be an inconvenience as these users rarely take more than 2 deer.

## INTERAGENCY STAFF COMMITTEE COMMENTS

The ISC acknowledges the extensive discussion by the Council members about the closure policy application to this situation. 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 WP22-09 closing this area because of concerns brought to them by the affected Federally qualified subsistence users in Pelican about not meeting subsistence needs for deer. WP22-10 was submitted by a resident of Pelican, who is also a member of the Pelican Fish and Game Advisory Committee, who also supported WP22-10. The proposal review process allowed the Council and the public to review the available data and provide testimony from all affected users of the resources. During the meeting, the Council 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 crafted a modification of WP22-10 to only reduce the harvest limit to 3 bucks for non-Federally qualified users rather than a closure. The Council felt this modification would address the concerns expressed by local residents.

## ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

### Wildlife Proposals (WP) 22-9/10

WP22-09 would close federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) to deer hunting by non-federally qualified users (NFQU) from October 15 to December 31 (Figure 1). WP22-10 would reduce the bag limit for NFQUs from 6 to 4 deer.



**Figure 1.** Map of the ADF&G Wildlife Analysis Areas for deer hunter data used to analyze effects of the proposals. Note the proposal area shown is for WP 22-09. Boundaries were not defined for WP 22-10.

### Background

In proposal WP22-9, the Southeast Alaska Subsistence Regional Advisory Council (SERAC) claims that NFQUs are competing with federally qualified users (FQU) when hunting Sitka black-tailed deer. Proposal WP22-10 was submitted by the public to address claims that federally qualified users (FQU)

who reside in Pelican are not meeting their subsistence needs because of brown bear predation on Sitka black-tailed deer and ongoing deer hunting pressure from NFQUs.

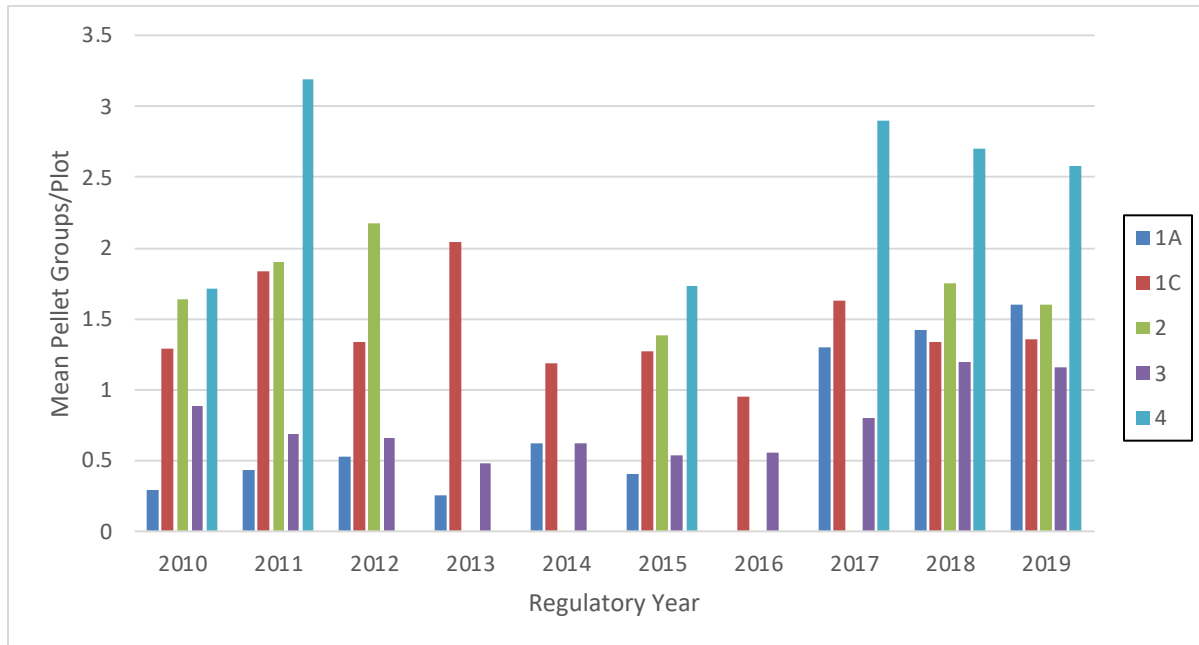
GMU 4 encompasses the ABC Islands (Admiralty, Baranof, and Chichagof) and the surrounding archipelago. Hunters residing in Southeast Alaska (GMUs 1-5) excluding Juneau and Ketchikan are eligible to harvest deer in GMU 4 under federal subsistence regulations. The current federal deer season for this area is August 1 to January 31 with a bag limit of six 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 (BOG) increased the state deer bag limit in GMU 4 from 4 to 6 deer because of high population indices in the GMU.

In 1992 the BOG 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. Because actual harvest depends on several factors including the number of people who hunt and effort by those hunters, harvest relative to the ANS should not be viewed as an indicator of successful management. Instead, measures of individual hunter success such as days of hunting effort required to harvest one deer and deer harvested per hunter should also be considered.

#### **GMU 4-Wide Population and Harvest**

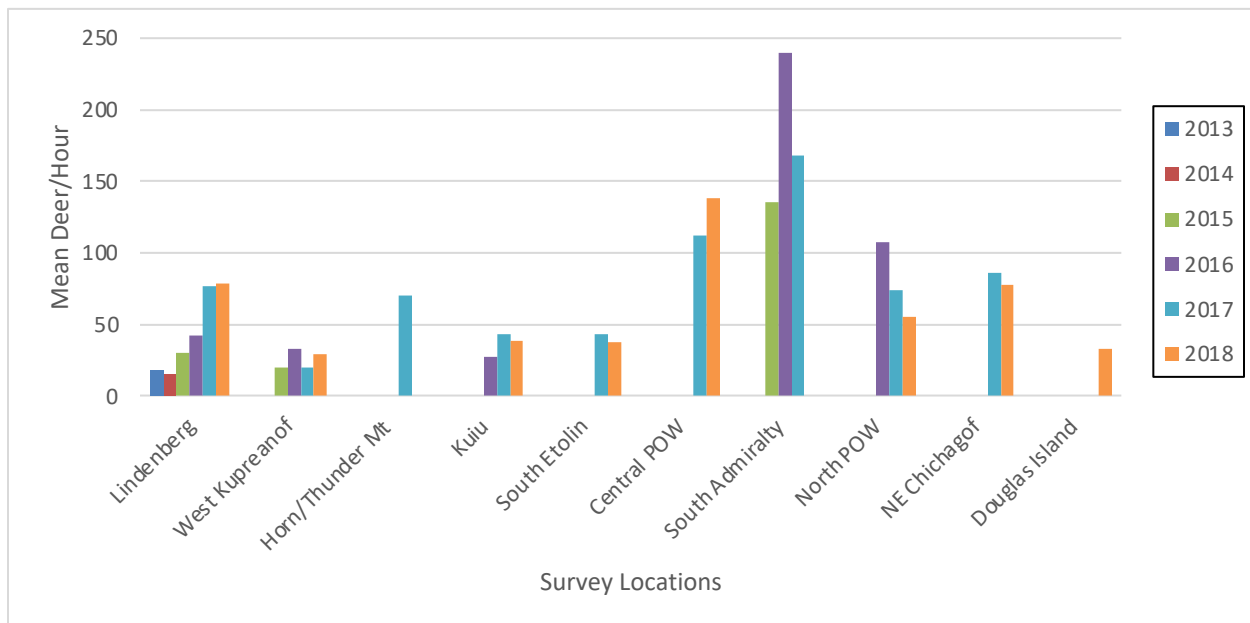
Monitoring deer abundance in forested habitat is challenging because deer cannot be directly counted through ground or aerial surveys. We present several types of survey data. Since the 1980s ADF&G has used spring pellet group counts to monitor broad ( $\geq 30\%$ ) changes in deer abundance. Spring 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 densities  $< 1.0$  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. This broad index of deer abundance suggests the GMU 4 population remains at high levels with no indication of depleted populations or conservation concerns.



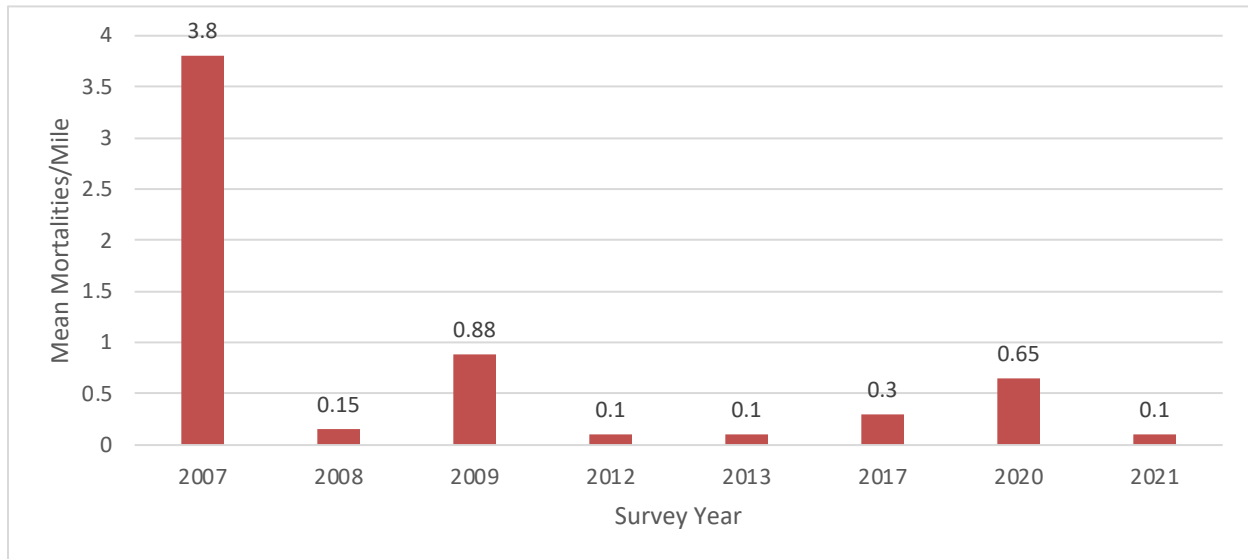
**Figure 2.** Mean number of deer pellet groups/plot for Southeast Alaska by GMU, 2010-2019.

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.** Mean number of mortalities per mile of beach surveyed in GMU 4.

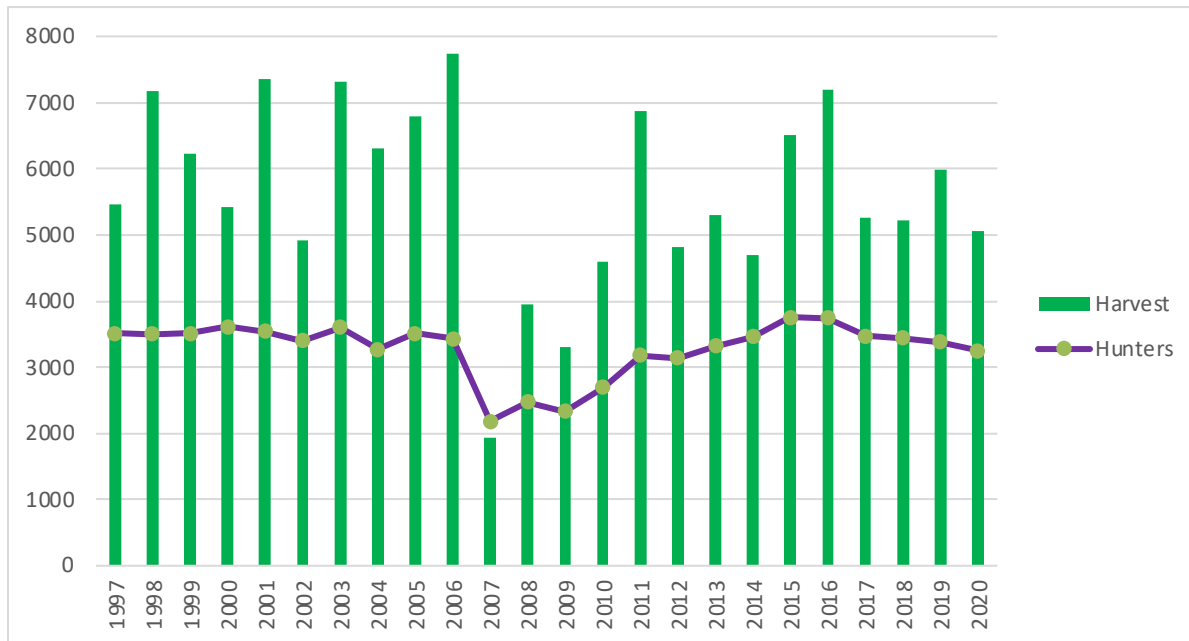
Taken together, these indices of deer abundance (pellet group surveys, alpine counts, mortality transects) suggest the GMU 4 deer population is high and stable. None of these indices suggests a decline in deer abundance or a conservation concern for the GMU 4 deer population.

### **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.

From Regulatory years (RY)1997-2019 the estimated average annual harvest in GMU 4 was 5,643 deer taken by 3,275 hunters (Figure 5). GMU 4 supports the highest deer harvest in the state. Although estimated harvest fluctuates for a variety of reasons each year, 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 in 2006 was followed by significant overwinter mortality of deer through-out GMU 4. That resulted in a precipitous decline in harvest from 7,734 deer in RY06 to 1,933 deer in RY07. Based on

harvest and other indicators of deer abundance, managers believe the Unit 4 deer population had fully recovered by the RY13 season.

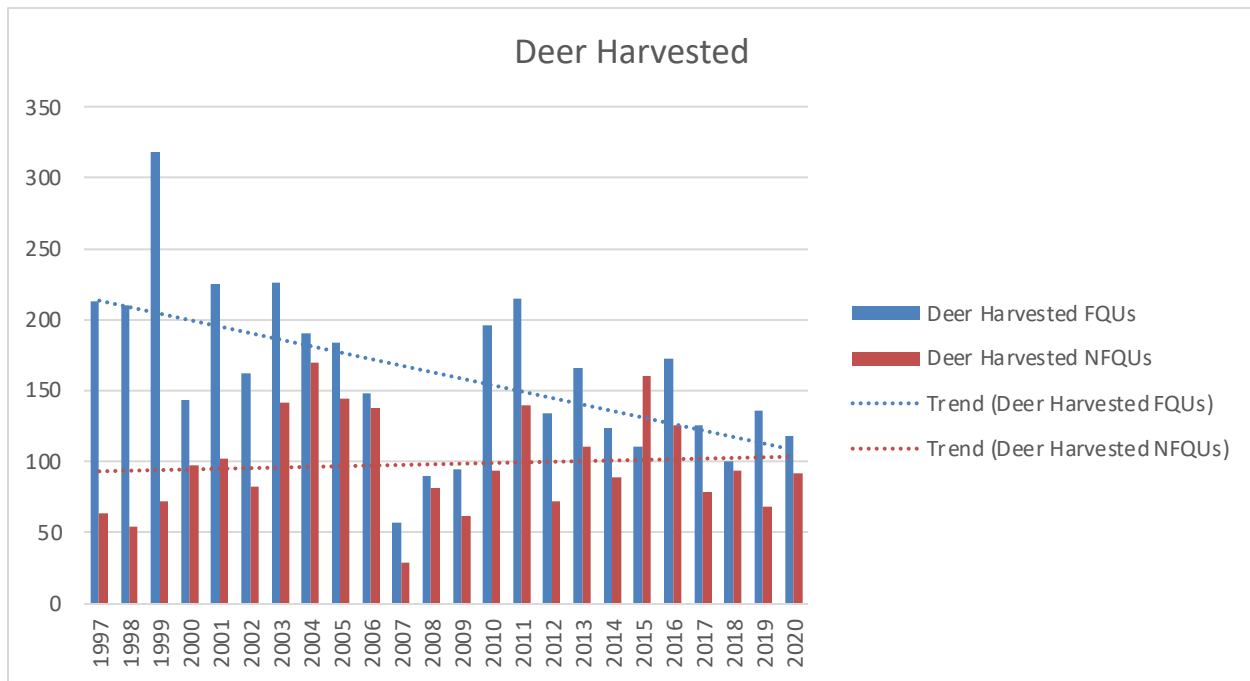


**Figure 5.** Numbers of people hunting deer and estimated deer harvest for GMU 4, RY97-RY20.

#### **Data Summaries for the Area Affected by This Proposal**

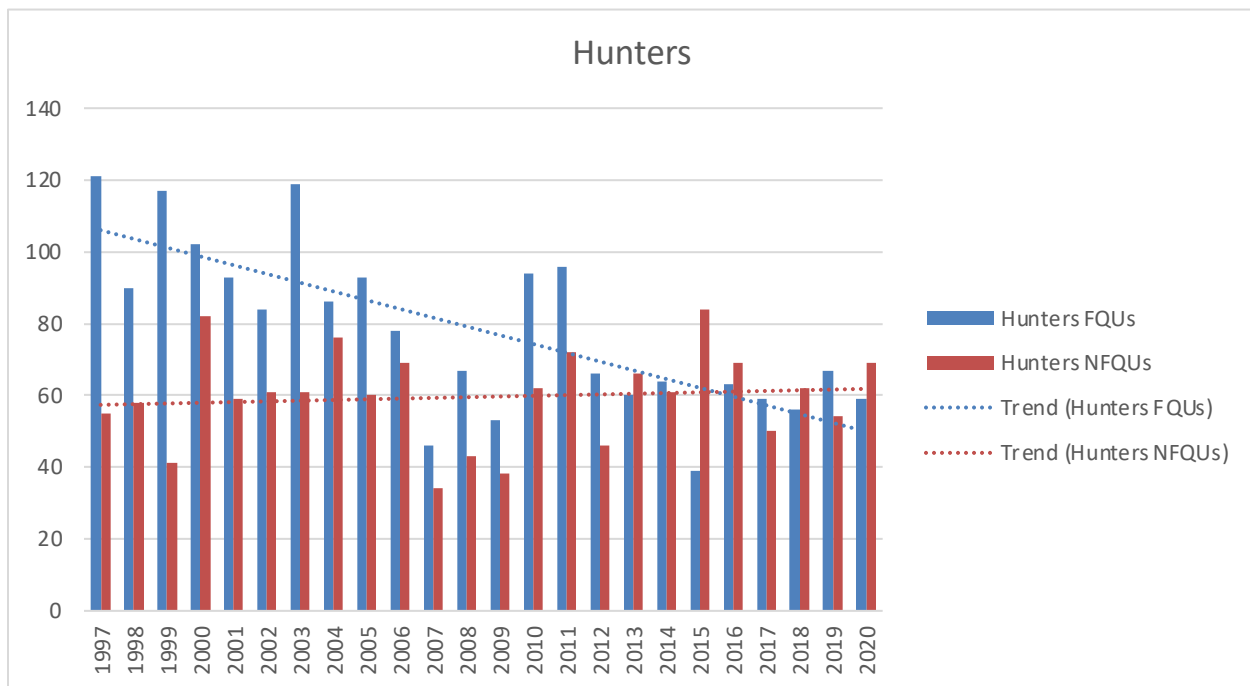
The proponent for WP22-10 identified Lisianski Strait and Lisianski Inlet but did not specify specific boundaries for the proposal area. Therefore, the data from the same WAAs are used in the analysis for WP22-09 and WP22-10 (Figure 1). The following analyses present data summarized for FQUs and NFQUs in WAAs 3417, 3418, 3419, 3421. WAAs are the finest scale at which data can be meaningfully summarized.

Prior to RY07, FQUs harvested an average of 202 deer annually. Harvest declined following the severe winter of 2006/2007, and since 2013, when ADF&G considered the deer population recovered, annual harvests have averaged 132 deer, about 70 fewer deer per year than the average prior to RY07. Prior to RY07 NFQUs harvested an average of about 107 deer annually, and since RY13, that average has returned to pre-RY07 levels.. Prior to RY07 FQUs accounted for 65% of the harvest. That percentage has since declined to approximately 55% (Figure 6).



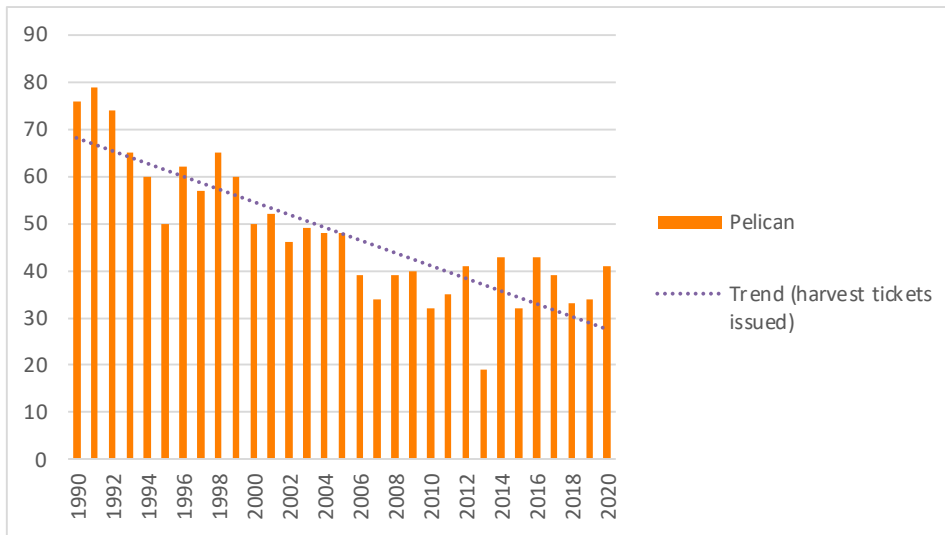
**Figure 6.** Estimated deer harvest and trend by FQUs and NFQUs, Lisianski area, RY97-RY20.

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. Since 1997, the number of NFQUs using this area has remained stable and averaged 60 hunters per year, while the number of FQUs has declined from a high of 121 hunters in RY97 to about 58 in recent years (Figure 7).



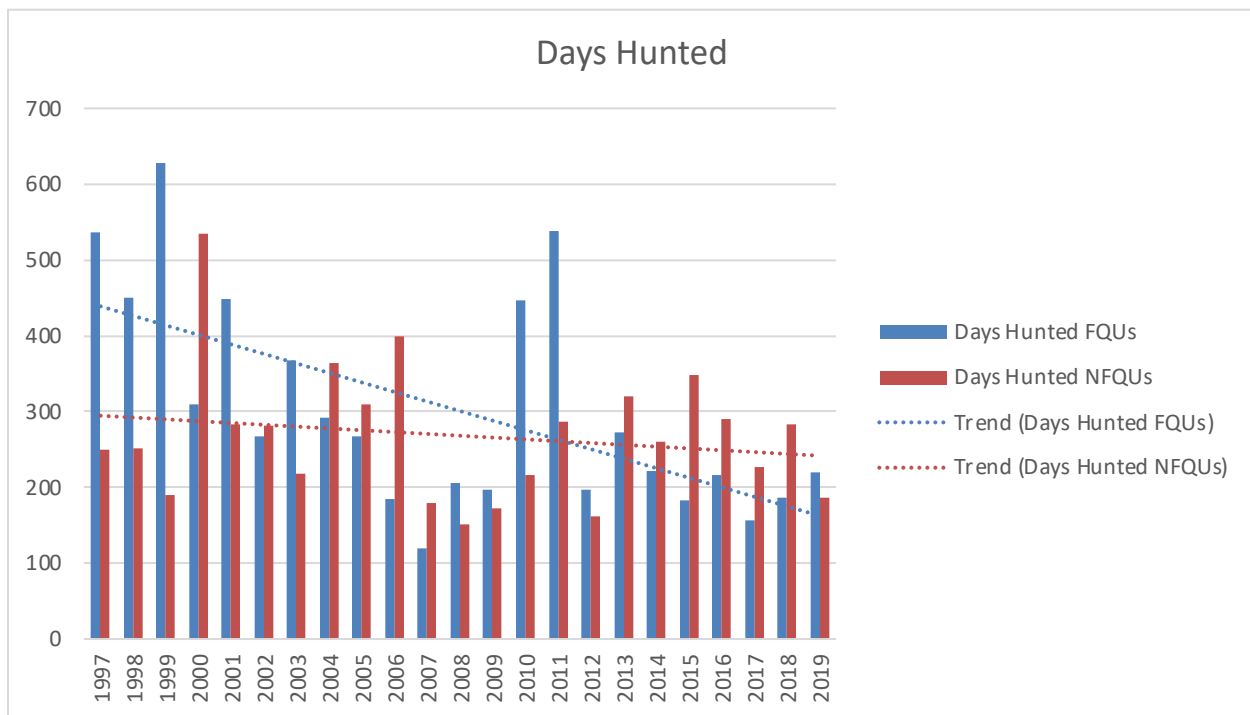
**Figure 7.** Trends in number of FQUs and NFQUs, Lisianski area, RY97-RY20.

In Pelican specifically, there has been a nearly 60% declining trend in the number of Pelican residents who have obtained deer harvest tickets (Figure 8).



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

Trends in days hunted mirror trends in numbers of hunters (Figure 9). FQUs and NFQUs both show downward trends, but the trend for FQUs is much more pronounced. Days hunted for FQUs has been roughly half of what it was prior to RY07. The number of hunters along with the number of days hunted both indicate decreased deer hunting effort for this area of GMU 4.

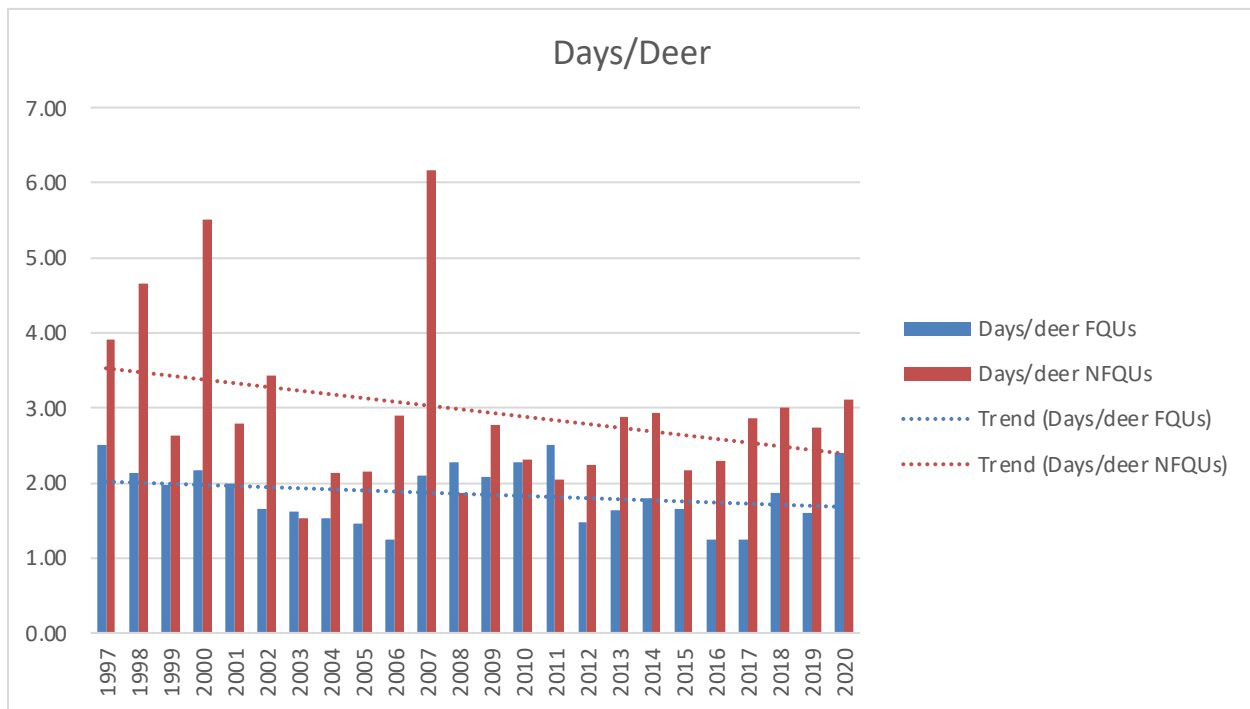


**Figure 9.** Trends in estimated days of hunting effort by FQUs and NFQUs, Lisianski area, RY97-RY20.

### **Trends in Hunter Efficiency**

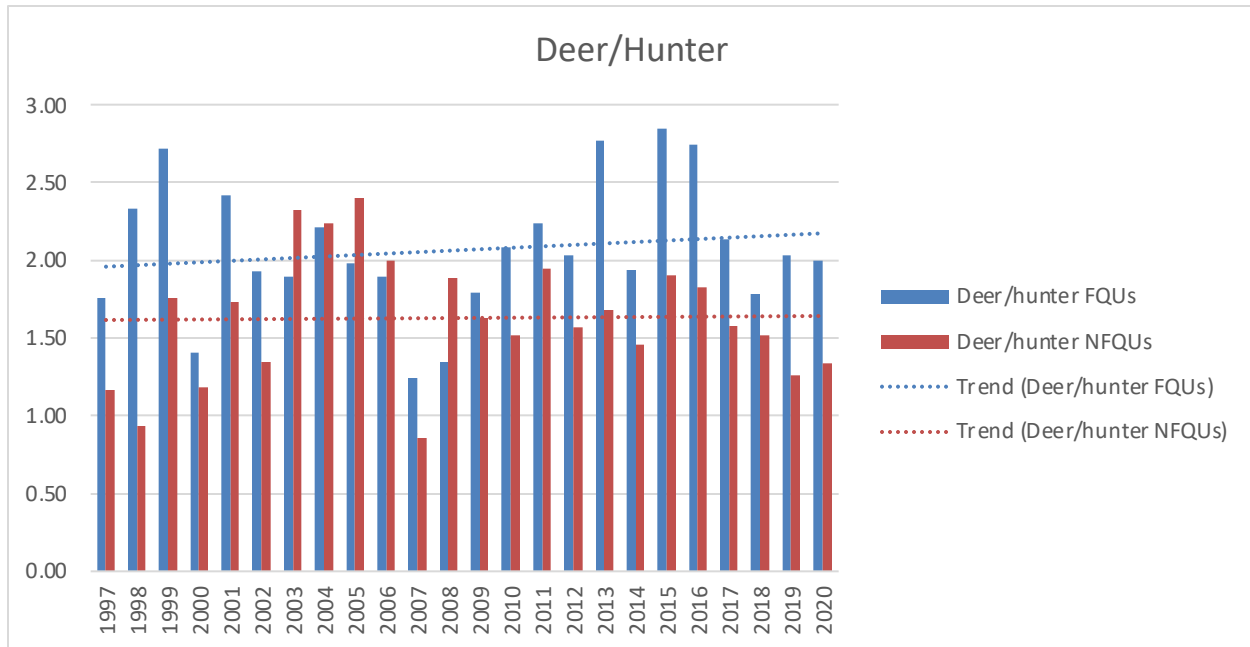
Hunter efficiency, or the days of hunting effort required to harvest 1 deer, is another indicator of the availability of deer to GMU 4 hunters. FQUs in the Lisianski area are consistently more efficient at harvesting deer than NFQUs. Since 1997 FQUs have required an average of only 1.9 days to harvest 1 deer while NFQUs have required an average of 2.7 days of hunting effort to harvest 1 deer. This metric is trending slightly down for FQUs (becoming more efficient) and has been below 2 days/deer for 8 of the past 10 seasons. (Figure 10).

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 2013-2019). Hunters in GMU 4 experience the most efficient deer hunting of anywhere in Alaska. FQU hunters in the Lisianski area have a better days/deer average than Unit 4 as a whole.



**Figure 10.** Trends in estimated days of hunting effort required by FQUs and NFQUs to harvest one deer, Lisianski area, RY97-RY20.

The number of deer harvested per hunter is another gauge of deer abundance and hunting success. Since 1997 the average number of deer harvested per NFQU has remained stable at about 1.6 deer/hunter (Figure 11). In contrast, the number of deer harvested per FQU is greater and has improved from an average of 2.1 deer per hunter prior to RY07 to an average of 2.3 deer per hunter since RY13. This metric, along with days/deer suggests that FQUs are enjoying better hunting success now than at any time over the past 2-3 decades.



**Figure 11.** Trends in mean number of deer harvested per FQU and NFQU hunters, Lisianski area, RY97-RY20.

### Hunt Chronology

Mid-October through December is the most popular time for hunters to pursue deer in GMU 4. Deer activity coinciding with the rut as well as winter snows that push deer to beaches, make for more successful hunting than earlier in the season. Hunters report hunting effort and harvest by month, so data can only be summarized by month. For NFQUs the period, October - December, encompasses use by 85% of hunters, 89% of days hunted, and 86% of harvest. For FQUs those numbers are slightly lower at 75%, 79%, and 78%, respectively (Table 1).

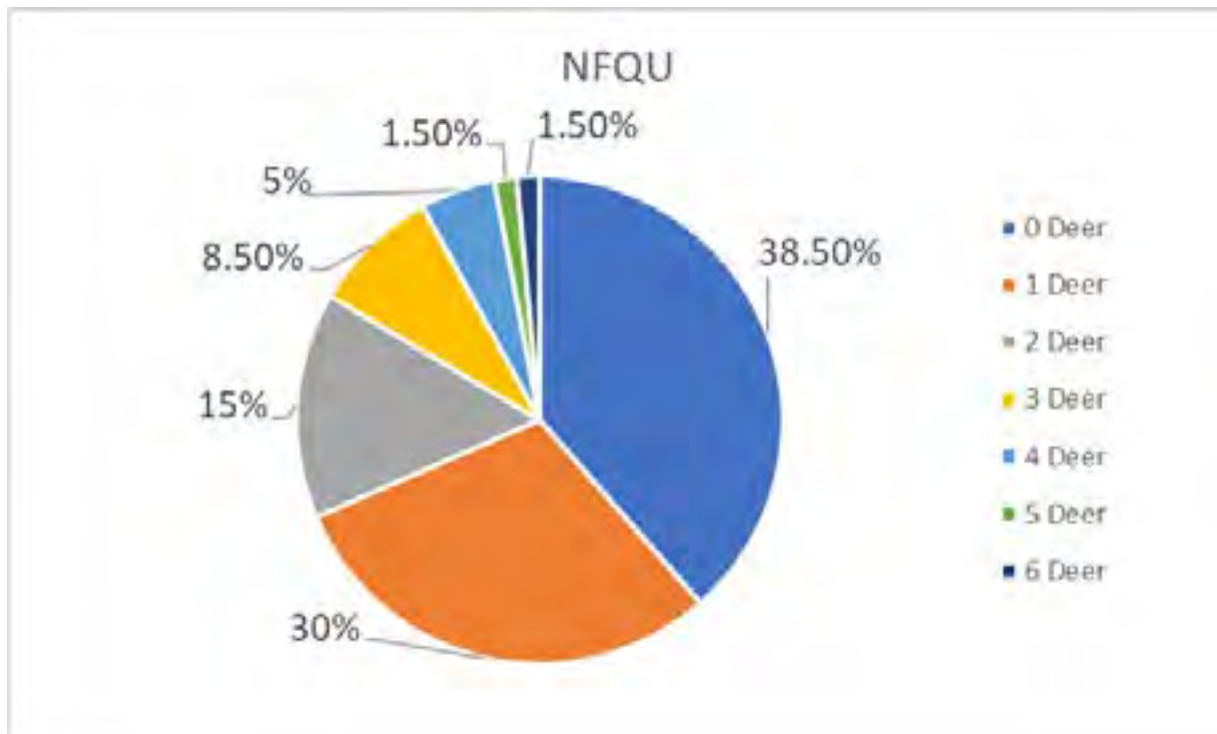
**Table 1.** Unit 4 Deer Hunting Chronology of Harvest and Effort for FQUs and NFQUs as both numbers and percent-age of total.

FQUs RY11-RY20						
	Hunters	%	Days Hunted	%	Deer har-vested	%
August	2,405	8	4,081	6	2,124	6
September	2,741	10	4,961	8	2,672	8
October	4,686	17	9,677	15	4,991	14
November	10,480	37	28,035	44	14,641	42
December	5,807	21	12,840	20	7,821	22
January	2,149	7	4,050	6	2,992	8
Total	28,268		63,644		35,241	

NFQUs RY11-RY20						
	Hunters	%	Days Hunted	%	Deer har-vested	%

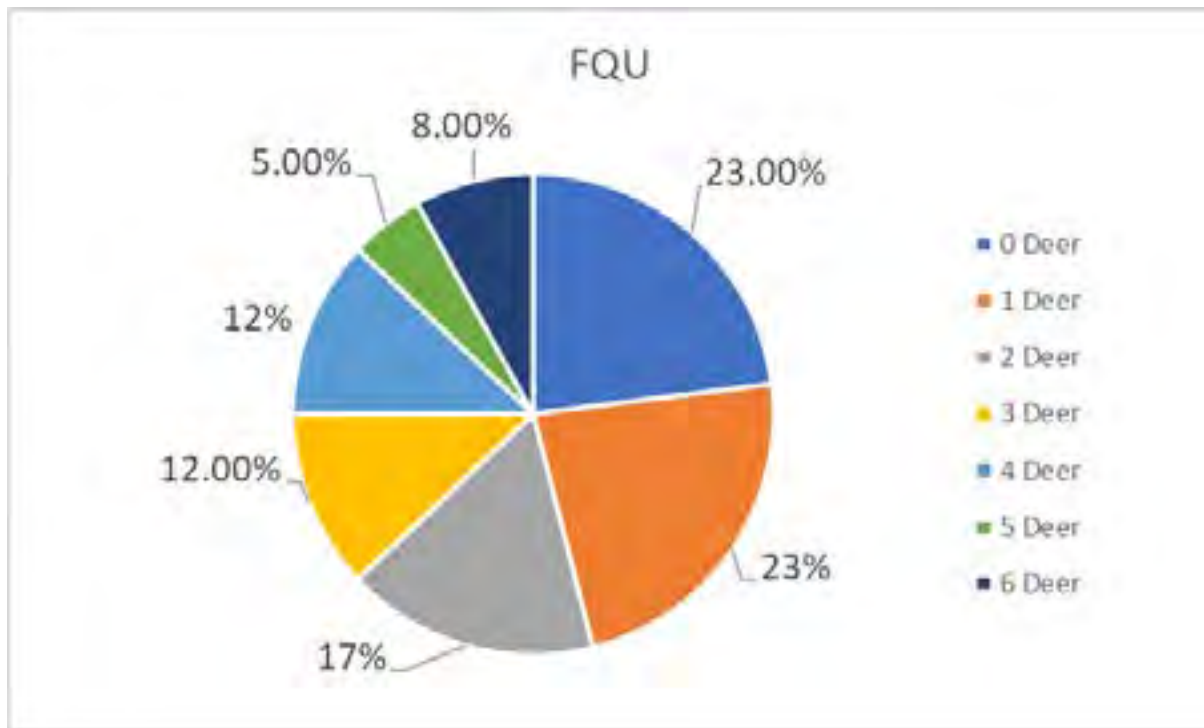
NFQUs RY11-RY20						
August	1,763	8	3,694	5	1,071	6
September	1,763	8	4,651	7	1,368	7
October	3,529	16	9,475	14	2,361	12
November	10,256	46	38,204	55	9,905	53
December	5,005	23	13,268	19	4,222	21
Total	22,316		69,292		18,927	

Proposal WP22-10 seeks to reduce the bag limit from 6 deer to 4 deer in the Lisianski area. 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) in RY 19 and RY20 was 1.5% for both.



**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, since RY11 13% of FQU hunters take more than four deer (Figure 13).



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

### Analysis

The analyses presented here were based on 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 were gathered by ADF&G, and hunter effort and harvest data were reported to ADF&G by hunters, including residents of Pelican, via mandatory deer harvest ticket reports.

These proposals asserts that FQUs have had difficulty meeting their subsistence needs for deer. The term, “subsistence need”, as used in Title VIII of ANILCA has no quantitative harvest benchmark. 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 opportunity or if current harvest meets the subsistence needs of FQUs. 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 the number of FQU hunters and effort by those hunters remained stable or increased.

ADF&G monitors abundance and trend of deer at the scale of the GMU or subunit, so we can only note that the available data indicate that 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 throughout GMU 4.

The existing evidence suggests predation has little effect on the GMU 4 deer population. Wolves and black bears are absent, so unlike other GMUs in the region, brown bears are the only large land predator in GMU 4. Brown bears occur at high densities throughout Unit 4, and they have been documented to prey on young fawns. However, a few weeks after the early June fawning period, fawn remains are no longer found in brown bear scats. Once fawns become mobile at 2-3 weeks of age, it appears bears either lose interest or are unable to catch them. Further, deer pellet survey data, aerial alpine survey data, and hunter harvest data all indicate that GMU 4 supports higher deer densities than adjacent GMUs inhabited by wolves and black bears.

Although brown bears have been reported to prey on older fawns and adult deer, the available evidence suggests that it is very rare and occurs opportunistically. McCarthy (1989) analyzed scats from bears on Admiralty Island and found deer remains in up to 10% of spring scats. The author did not distinguish whether those remain were from young fawns or scavenged carcasses of winter-killed deer. During mid-summer up to 14% of scats from bears using high elevation habitat (>400m) contained some deer remains, but deer was absent from summer scats of bears using low elevation habitat. Deer was not found in bear scats collected during late-summer and fall.

Studies of radio collared deer on Admiralty (Schoen and Kirchhoff 1990) and Chichagof (McCoy et al. 2015) islands in GMU 4 further support that brown bears rarely kill deer. Neither study reported any predation-related mortalities. In general, during fall when snow pushes deer to lower elevations and salmon runs have ended, most brown bears have moved to higher elevation denning areas. Although some bears may remain at lower elevations and feed on remains of hunter-killed deer, there is no evidence that brown bears have any appreciable effect on deer distribution during hunting season or abundance at any time of year. In fact, ADF&G biologists, hunters, and guides working in GMU 4 report seeing deer and brown bears in close proximity with the deer exhibiting no apparent concern.

The proposals suggest that brown bear predation and competition with NFQUs is making subsistence harvest more difficult for FQUs in the Pelican area. Because no similar proposals have been submitted before, we presume that in the past FQUs were able to provide for subsistence uses. Therefore, to evaluate the need for this restriction of NFQU opportunity we investigated harvest and measures of hunter effort for trends of increasing effort and harvest by NFQUs.

We found that since 1997 the total number of individuals hunting deer in the Lisianski area has declined by about 25%. However, that decline primarily results from a roughly 50% decline in the number of FQUs hunting deer in this area. Since the late 1990s total days of deer hunting effort in this area also declined, while NFQU hunting pressure has remained relatively unchanged. Again, most of that decline resulted from decreasing hunting effort by FQUs. This finding directly contradicts the assertion in the proposal that increasing competition from NFQUs is hindering harvest by FQUs. In fact, deer hunting effort and the potential for competition between FQUs and NFQUs 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. In recent years the days of hunting effort required to harvest one deer has trended downward for both groups of hunters. Since RY13 FQUs have required an average of only 1.7 days of hunting effort to harvest one deer, whereas NFQUs have required 2.7 days of hunting effort to harvest 1 deer. During the same period the days of hunting effort required to harvest a deer for all of GMU 4 hunters was 2.4 days/deer, so the 1.7 days of hunting effort required for FQUs in the proposal area represents extremely

efficient hunting. Numbers of deer harvested per FQU hunter has also trended upward, averaging 2.1 deer/hunter from RY97-RY06 and 2.3 deer/hunter from RY13-RY20.

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. However, these measures of hunter success based on hunt reports provided by FQUs, including residents of Pelican, indicate that deer hunting conditions in the Lisianski area remain very good and that in recent years FQUs have enjoyed greater hunting success.

During RY19 and RY20, the first years the state bag limit in GMU 4 was expanded to six deer, 54 and 69 NFQUs hunted in the Lisianski area, respectively. By applying the percentage of NFQUs who harvested 5 (1.5%) or 6 (1.5%) deer in GMU 4 during RY19 and RY20 to the Lisianski area, ADF&G estimates 3 additional deer per year were harvested by NFQUs under the more liberal bag limit. It can be inferred that this would be the annual reduction in harvest under a four deer bag limit. However, these calculations do not take into account deer harvested below mean high tide and on other State and private lands. Because NFQUs take an average of only 1.6 deer per hunter, any bag limit reduction is unlikely to have any effect on the deer population or increase harvest opportunity for FQUs in any way. Proposal WP22-10 would only serve to potentially eliminate opportunity for an average of two NFQUs per season who choose to take more than 4 deer.

### **Summary**

These proposals asserts that FQUs have had difficulty meeting their subsistence needs because of brown bear predation and ongoing competition with NFQUs. Our analysis of predation, the deer population, hunter effort and harvest trends found no support for those contentions. The available information indicates that brown bears are ineffective predators on deer and that deer remain abundant throughout GMU 4. In the Lisianski area it is unlikely that hunter harvest has reduced deer abundance because total hunting effort is relatively light, and over the last two decades hunter effort and harvest have 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, rather than increasing, the number of NFQUs and days of hunting effort by NFQUs has held steady for 2 decades. Further, days of hunting effort required to harvest a deer remains very low and the number of deer harvested per FQU hunter has been increasing.

Harvest data indicate there has been a decline in the number of deer harvested by FQUs in the Lisianski area. 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 both metrics have declined by over 50%. Deer remain abundant, federal regulations provide a six-month open season, and “competition”, or hunting effort by NFQUs, has been stable for two decades. Therefore, we conclude that the decline in federal subsistence harvest of deer in the Lisianski area results from a decline in participation and effort by FQUs, not depleted deer populations, predation by brown bears, or increasing competition from NFQUs.

### **Impact on Subsistence Users**

WP22-09 could result in eliminating some competition in this area between FQUs and NFQUs between October 15 and December 30. However, hunting under state regulations could still occur on state-owned tidelands below mean high tide and private property. WP22-10 would have no impact on FQUs.

### **Impact on Other Users**

These proposals could possibly result in eliminating some competition in this area between FQUs and NFQUs after October 14th. However, NFQUs could continue to hunt state-owned tidelands below mean high tide and private property. Opportunity for NFQUs to harvest deer on federal public lands in the Lisianski area would be slightly reduced. Few if any NFQUs take more than 4 deer.

**State customary and traditional use findings:** The Alaska Board of Game has made positive customary and traditional use findings for deer in GMU 4.

**Amounts Reasonably Necessary for Subsistence:** Alaska state law requires the Board of Game to determine the amount of the harvestable portion of a game population that is reasonably necessary for customary and traditional uses. This is an ANS. The board does this by reviewing extensive harvest data from all Alaskans, collected either by ADF&G or from other sources. The ANS for deer in GMU 4 is 5,200–6,000 deer.

Contrary to its name, ANS does not indicate subsistence “need”. Instead, ANS provides the board with guidelines on typical numbers of animals harvested for customary and traditional uses under normal conditions. The ANS for deer in GMU 4 was established in 1992. Hunting regulations can be re-examined if harvests for customary and traditional uses consistently falls below ANS. However, harvest may decline for many reasons, and in this case it appears to result from declining participation and effort by FQUs in the Lisianski area

<b>The State hunting season and bag limit for deer in GMU 4 including the Lisianski Area is:</b>			
GMU 4Remainder	Bag Limit 6 deer (bucks only to Sep 14 <sup>th</sup> )	<u>Resident Open Season</u> <u>Aug1-Dec 31</u>	Resident Open Season Aug1-Dec 31
		(Harvest ticket)	(Harvest ticket)

### **Conservation Issues**

There are no 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 stable. 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, 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**

If these proposals are adopted NFQUs will still be able to hunt deer on state-owned tidelands below the mean high tide line and on private lands with a bag limit of 6 deer. The tideline is not marked, so NFQUs and enforcement officers will have difficulty determining when deer are above or below the line of mean high tide. This makes enforcement difficult and regulations confusing.

### **Position**

ADF&G **OPPOSES** both proposal WP22-09 and WP22-10. There is no evidence hunting by NFQUs as cited in WP22-09 or that brown bear predation as cited in WP22-10 has affected the ability of FQUs to harvest deer. Although the number of FQUs hunting and total harvest by those hunters has declined, the

remaining FQUs hunting in this area are enjoying greater success. 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 already provide greater opportunity to FQUs compared to NFQUs. FQUs are eligible to hunt an entire month longer than NFQUs with a season extending through the month of January as well as a 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.” Proponents of this proposal, and similar ones that will be considered, interpret these conditions to mean it gives them the right to total exclusivity to an area based on the aesthetics of hunting. They justify the FSB passing this proposal with statements, “Just trying to find a way so people can hunt in peace here” or “... going to a favorite spot and, you know, seeing another boat there. It doesn’t matter whether or not they’re successful hunters or not, it’s just the fact that they’re there alter the way you hunt.” 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 GMU 4 deer population, NFQUs are enjoying greater success harvesting deer, and no restrictions are needed for the continued subsistence use of deer.

### **Literature Cited**

- McCarthy, T. M. 1989. Food habits of brown bears on northern Admiralty Island, Southeast Alaska. Master’s thesis, University of Alaska, Fairbanks.
- McCoy, K. R., D. P. Gregovich, P. W. Mooney and N. L. Barten. 2015. Movement patterns, home range, and habitat use by Sitka black-tailed deer on Chichagof Island, Southeast Alaska. Alaska Department of Fish and Game, Division of Wildlife Conservation, Federal Aid Annual Research Performance Report 1 July 2014–30 June 2015, Federal Aid in Wildlife Restoration Project 2.15, Juneau.
- Schoen, J. W., and M. D. Kirchhoff. 1990. Seasonal habitat use by Sitka black-tailed deer on Admiralty Island, Alaska. *Journal of Wildlife Management* 54(3):371-378. <http://doi.org/10.2307/3809641>

**Data Tables****Table 1.** Summary Table Federally Qualified Deer Hunters, WAAs 3417, 3418, 3419, 3421.

<b>Regulatory Year</b>	<b>No. of Hunters</b>	<b>Total Hunt Days</b>	<b>Bucks Har-vested</b>	<b>Does Har-vested</b>	<b>Total Harvest</b>	<b>Deer per Hunter</b>	<b>Days per Deer</b>
1997	121	536	165	48	213	1.8	2.5
1998	90	50	150	60	210	2.3	2.1
1999	117	628	272	47	318	2.7	2.0
2000	102	310	117	26	143	1.4	2.2
2001	93	449	177	48	225	2.4	2.0
2002	84	267	114	47	162	1.9	1.6
2003	119	367	179	47	226	1.9	1.6
2004	86	292	157	33	190	2.1	1.5
2005	93	268	152	32	184	2.0	1.5
2006	78	185	129	20	148	1.9	1.3
2007	46	120	57	0	57	1.2	2.1
2008	67	205	84	6	90	1.3	2.3
2009	53	197	86	9	95	1.8	2.1
2010	94	446	168	28	196	2.1	2.3
2011	96	539	188	28	215	2.2	2.5
2012	66	197	118	16	134	2.0	1.5
2013	60	273	141	25	166	2.8	1.6
2014	64	222	107	16	124	1.9	1.8
2015	39	183	104	7	111	2.9	1.7
2016	63	216	135	37	173	2.8	1.3
2017	59	157	110	16	126	2.1	1.3
2018	56	187	89	11	100	1.8	1.9
2019	67	219	113	22	136	2.0	1.6
2020	59	284	94	25	118	2.0	2.4

**Table 2.** Summary Table Non-Federally Qualified Deer Hunters, WAAs 3417, 3418, 3419, 3421.

<b>Regulatory Year</b>	<b>No. of Hunters</b>	<b>Total Hunt Days</b>	<b>Bucks Harvested</b>	<b>Does Harvested</b>	<b>Total Harvest</b>	<b>Deer per Hunter</b>	<b>Days per Deer</b>
1997	55	250	40	24	64	1.2	3.9
1998	58	252	44	10	54	0.9	4.7
1999	41	190	72	0	72	1.8	2.6
2000	82	534	74	23	97	1.2	5.5
2001	59	284	92	10	102	1.7	2.8
2002	61	281	72	10	82	1.3	3.4
2003	61	218	114	28	142	2.3	1.5
2004	76	364	165	5	170	2.2	2.1
2005	60	310	113	31	144	2.4	2.1
2006	69	400	105	33	138	2.0	2.9
2007	34	179	24	5	29	0.9	6.2
2008	43	152	66	14	81	1.9	1.9
2009	38	172	53	10	62	1.6	2.8
2010	62	217	89	5	94	1.5	2.3
2011	72	287	118	21	140	1.9	2.1
2012	46	162	71	1	72	1.6	2.3
2013	66	320	98	13	111	1.7	2.9
2014	61	261	76	13	89	1.5	2.9
2015	84	348	132	28	160	1.9	2.2
2016	69	290	108	17	126	1.8	2.3
2017	50	226	72	7	79	1.6	2.9
2018	62	283	76	18	94	1.5	3.0
2019	54	186	57	10	68	1.3	2.7
2020	69	287	71	21	92	1.3	3.1

## 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 10,000 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, *Niwotuk 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 Sec. 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 Alaskans' 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/inboxid/AAQkADZiNDE2M2RhLWVOTgtfNDQ1OjS04YjQxLWE0YzY0NWl3MDNjZQAQALsk...> 1/1

To Whom It May Concern:

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

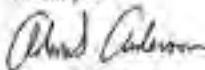
**WP22-07** - To exclude hunting privileges in this region to Juneau residents who depend solely on deer meat to survive is simply outrageous. Angoon hunters DO NOT hunt anywhere remotely close to Hawk Inlet and have the benefit of hunting more productive and safer waterways near town. (Mitchell Bay) 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 27? 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

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[mikebethers@gmail.com](mailto:mikebethers@gmail.com)

June 22, 2021

Theo Matuskowitz  
Federal Subsistence Board  
Office of Subsistence Management  
1011 East Tudor Road, MS-123  
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.

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**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.

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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)728-2279

[MikeBovitz@alaska.gov](mailto:MikeBovitz@alaska.gov)

Theo Matuszkowicz

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. Matuszkowicz:

I am NOT in support of the 3 wildlife proposals 22-07 Angoon, 22-08 Illoolah, 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 31<sup>st</sup>. 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>

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

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/AAQkADZINDE2M2RhLWVOTgtNDQ1OjS04YjGxLWE0YzY0NW13MDNjZQAQAEEx...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] WP 22-09 Lisianski Subsistence Deer Hunting Restrictions****bornalaska@yahoo.com <bornalaska@yahoo.com>**

Fri 7/16/2021 12:14 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

My name is Chris Carson, my wife and I own a cabin 3 miles outside Pelican. Our cabin is in the same sub-division as the author of WP 22-09 proposal. Mr Slatter has on a number of occasions sought to purchase our property and the remaining four other lots in the division, for which he owns all the lots except for four. The four other lots are owned by people who are not residents of Pelican or other Alaska substance communities.

If this proposal was to pass, it would mean that none of us would be able to use our cabin to hunt deer. Our cabin had been in the family for over 25 years. I was born in Juneau in 1965, live in Pelican as a child and have been hunting and fishing in the Pelican area most of my life.

I have always found there to be plenty of deer in the area and truly believe this proposal is Mr. Slatter attempt to restrict the resources from the remaining families who live in Slatter National Park, (as local Pelicans call it) so they would no longer have a reason to visit Pelican, which could lead to selling their property.

Hunting and fishing has always been an important part of our lives. My son who was born and lives in Juneau now has children who have spent time hunting at the cabin, this is now the third generation of Carsons hunting at the cabin.

I strongly encourage the board to decline WP 22-09 Lisianski Subsistence Deer Hunting Restrictions as it does not have any solid standings to support its implementation.

Thank you for your time,

Chris L. Carson  
Sent from my iPad

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWWOTgtNDQ1OjS04YjQxLWE0YzY0NW13MDNjZQAQALZe...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wildlife Proposal - 22-09 - Lisianski

CARSON JIM <akjim22@yahoo.com>

Mon 7/19/2021 7:50 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.**

We would like to comment on the above proposal regarding hunting in the Lisianski Inlet. As hunter's and long time Alaskan residents we strongly oppose this proposal. The land in the proposal is public land. Since when can one person's want's oversee the public. There is no lack of deer or evidence of such to prompt such a proposal. If we allow this type of strong arm tactic from an individual special interest, what is next for the public land user and average Alaskan. Please do not allow this to pass. Public land is Public land. No one person should change that.

Jim and Tama Carson  
Juneau Alaska

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWWOTgtNDQ1OjS04YjQxLWE0YzY0NWl3MDNjZGAGABa5...> 1/1

## Subsistence Opposition WP22-09 SE

I, Norm Carson, am adamantly opposed to the proposed rural qualification for deer hunters within the Lisianski Inlet & Strait area. I recognize my comments are lengthy; therefore my recommendations are preceding how they were derived.

### Recommendations

The best solution is to not support the Federal Subsistence proposal. I recommend the Pelican Fish & Game Advisory Board address this issue with adequate public notice so that we can arrive at well thought out recommendation unlike the proposal that was rammed through the SE Federal Advisory Board March 16-18 with selective input from the community. These are some suggestions I would have for the Pelican Board:

- RF qualified no change, 6 deer
- All non rural federally qualified NRFO, Alaska residents. 4 deer, season ending December 31.
- Non-residents of Alaska 1 deer, season August 1 ending October 31
- ADF&G Game Biologist for the area has flexible management authority to change bag limit or season as needed for resource. ADF&G has determined there is not a shortage of deer.
- There is not a shortage of deer in this area; weather and an abundance of brown bear deprived of their customary food source kept the deer very skittish and off the beaches.

If WP22-09 should it pass will actually make the situation worse for the following reasons:

- NRFO hunters will have to hunt on State tidelands up to the mean high tide mark. This will result in more skiffs running the beaches and the deer will quickly learn to run off at the sound of an outboard.

- NRFO hunters will be allowed to hunt on private land; this will increase the potential for conflict with a land owner as we saw in 2020.
- RFO hunters from other areas such as Haines and Sitka will not be affected by WP22-09

#### Background Information

I first came to Pelican in 1966 as a college kid working at the Pelican Cold Storage; in 1968 I joined the Alaska State Troopers. I retired in 1990 from law enforcement as Commander of all Trooper operations in Southeast Alaska.

My parents resided in Pelican and in their later working years were commercial salmon trollers. I spent my annual leave time commercial fishing and hunting in the Lisianski area; my mother was an avid deer hunter and fisherman. At the early age of 7 or 8 years both of our sons participated in October and November deer hunts with myself and my parents. Both of our sons are State Troopers, one in Juneau and another in Delta. Both of them look forward to a deer hunt with their father during November; we often talk about the family time they spent hunting as youngsters with their grandparents.

In 1981 my wife and I obtained a 3 acre land parcel in the State sponsored land lottery. We built our future home 3 miles south of Pelican and acquired 2 other lots in our cove through purchase. After my retirement from State employment I spent sufficient time at our Pelican home to claim residency in the area; our sons joined me during the summer commercial fishing the local waters. My wife remained employed in Juneau until our youngest son graduated in 1997; at that point we sold the Juneau property and moved to our Pelican home.

Pelican was never a total subsistence community in the category of Angoon, Hoonah, or Kake. Pelican was founded in 1938 as a site for a cold storage; the nearest "tribal community" was Hoonah. Pelican was a mixture of Finns, Swedes, Norwegians, Tlingits, Swiss, and Filipinos. At a time in our past there were approximately 350 residents, perhaps 200 year round. In the 1980's the cold storage was exporting approximately 5 million pounds of frozen fish annually; at one time we led the world in the landing of King Salmon. The Lisianski area was never the site of an Alaska

Native settlement; but some of our earliest residents were Alaska Natives and important to the building of the town.

The town's economy slumped as the fish market turned from whole frozen fish to value added in the early 2000's. The town's population dropped to around 100 residents. On the positive side we have seen a resurgence in the commercial trade with the opening of a new processing operation that is employing roughly 25 workers seasonally. The sport fishing charter/ lodge businesses bring an estimated 500 clients annually and this helps support sailings by the Alaska Marine Highway Service and scheduled airplane service from Juneau. The fact that Pelican has hydro power is an incentive for further expansion if our housing shortage is solved.

The question of food security is important. I can say that 99% of the residents and perhaps 100% receive food from Juneau stores. On ferry day the freight trucks unload pallets of food; I witness a few proponents of this subsistence rural qualification proposition and other residents gathering up their purchases from Costco, Fred Meyer, Super Bear, etc. Yes, we all harvest fish, shell fish, berries, and deer from the area; it is a supplemental part of our diet.

I have been hunting this area for over 50 years; there is nothing about the number of hunters or the availability of deer that has not cycled through the decades. In the 1990's and first decade of the 21st century I well recall turning a corner in my skiff and finding another hunter's skiff anchored where I intended to hunt. Not a big deal; I went and found another place. It was not unusual to find another hunter's prior foot prints on a the trail. Often I called up a November buck while in an area that had been hunted by some one else a few days prior, and in one case just a few hours prior.

The first Department of Natural Resource, State of Alaska, land lottery in the Lisianski area occurred some 40 years ago. Some folks from Juneau that had family or friends in Pelican obtained building lots. Other residents from Fairbanks to Sitka obtained acreage and built homes; some have become full time residents and others have recreation houses they use while fishing and/or hunting. None of the Pelican residents of that time tried to enact new laws to keep the "new comers" from taking "their fish or deer". A couple of residents have told me they used to hunt in the immediate area of our present home.

The 2020 hunting season was unusual because of the weather and the pandemic. The local spawning streams had very low returns of salmon. The summer was very moist and the berry crops were sparse. The brown bear turned to grubbing for roots in late September and October. More bear were seen on the beaches than usual; some were seen pursuing deer. It was not unusual to have bears grubbing in resident's yards in Pelican; ten were counted around Pelican Creek; just a couple hundred yards from the school. A bear was seen walking the boardwalk and another out on the breakwater where boats are stored and the city shop is located. Is it any wonder the deer were skittish and staying off the beaches?

My eldest son came out from Juneau to hunt with me during the November rut when the bucks are most likely to respond to a deer call. During this two week period the weather was so blustery that we only were able get out in the skiff for two hunts. One one of our hunts we found not much sign low and more up around the 400 foot level; we should have gone up higher. The next time we got out we found good sign at the 500 foot level; I called up three deer; my son shot one and the others got away. Later my son found another deer on the hillside not far from our home. We believe the deer were unusually high for November and very wary; probably because of bear prevalence. We had no problems with competition from other hunters for an area to hunt.

An unfortunate aspect of this proposal is that it will cause a division within the community. The newest board member, Jim Slater, pushed this proposal within the community to a select few. Jim is a passionate environmentalist; we have had discussions on cruise boats in Lisianski Inlet, charter boats, sport fishing effort, etc. I commend his concern; he has remarked that he has seen the effects of tourism in California where he once resided and he does not want to see it happen here. I agree with him; but I do not think that is likely due to the remoteness, land use restraints, and cost of getting here.

The manner in which this proposal was hurriedly brought before the March SEARAC meeting may have been technically correct; in my estimation it was inappropriate. These are the issues I question:

- A select few were notified this proposal would be put forth.

#### March 14th

- 7:45 PM: Jim sent email to the selected few "I am still gathering the information to put in a form to submit a proposal. It will be along the lines of of what we discussed."

#### March 15th

- 9:55 AM: Jim sent the 6 members an email: "Hi everyone, here is the proposal we discussed. I have also included the agenda, which has the dial in info. But here it is:" You should call in either Tuesday or Wednesday at 9:00 AM. That is when the public testimony is scheduled. I'll call you guys later. Thanks, Jim."
- 2:46 PM: Jim sends email to the selected few: "Hi everyone, This was sent to me by the biologist for the area. Please give me some feedback, if you guys support this please re-confirm. I don't want to propose it if it doesn't have broad support from the community."
- 5:17 PM: Jim sent email to 6 community residents with a wording recommended for supporting the proposal; he said he provided this in testimony at the previous RAC meeting:
  - "We live a subsistence lifestyle"
  - Coho run on Lisianski River
  - 500-750 charter visitors
  - concern about bareboat charters

#### During the March 16 -18 Meeting:

- A select group of residents met at City Hall and utilized the teleconference phone system to call in to the SEARAC meeting and comment on the deer proposal. Mayor Weller, I believe made the call and turned it over to the few people present; two of them are on the city council. This teleconference at City Hall was not announced publicly.
- The SEARAC passed the proposal and it will be heard by the Statewide Board; this will give it extra impetus for passage.

If this issue was of such great concern, why did it take so much coaching for the testifiers? If the teleconference at City Hall were publicized might there have been at least one dissenter?

Another issue I have with the March SEARAC meeting was the generalities spoken by the proponents and the lack of follow up questions:

- "We saw quite an increase in the number of hunters in the Inlet this year." *Follow up needed: Please quantify the number and the town or area they came from.*
- "There are several groups that live outside the area and state that come seasonally and target some of our key resources here in Lisianski Inlet. These include the coho run in Lisianski River and Sitka black-tail deer hunting in the habitat surroundings." *Follow up needed: How many people have you seen fishing on the Lisianski River? How many fish did you see caught? Where did the large groups of deer hunters stay in Pelican? How many hunters were in these groups?*
- "fishing in Lisianski Inlet, in general, has been significantly worse over the last -- it's decreased over the last decade or two." *Follow up needed: Is this based upon your personal fishing experience? Could this be related to the area wide issue with colder water and less bait fish?*
- "This year several members were not, including myself, able to harvest a deer or saw very limited access." *Follow up needed: Over the previous two years, how many deer have you taken annually? How many days did you go hunting after October 15th in 2020?*
- "But over the few years we've seen a lot of big parties coming out and doing hunting." *Follow up needed: Please describe these hunting parties; how did they get to Pelican?*
- "the concern I share with the community is the obvious growth in the sportfishing" *Follow up needed: Does most of the sport fishing by lodge clients occur in the Lisianski Inlet or out along the coast of Yakobi Island and beyond?*
- "are folks in Pelican thinking about addressing all those resources or are they focusing primarily on deer?" "All the resources." *Follow up needed: If salmon were a subsistence issue wouldn't that remove commercial salmon fishing from the Lisianski Inlet and Strait?*
- "I'm 65 years old but I've been hunting for 50 years and this is a -- this past year has been the first year that I haven't even gotten a deer" *Follow up needed: Did you hunt with anyone else that shot deer that you could have taken?*
- "we have noticed in the last couple of years is increased pressure from people that don't live here. They show up and they compete with us directly for the resources that we're after" *Follow up needed:*

*You came here 40 years ago, were there more people living in Pelican then or now?*

- "The lodge that I spoke of is currently a summer fishing lodge and to be honest we've only just heard the idea that this is going to become a hunting lodge so this is just something that we're looking into the future to limit, if possible, if that were to become an option for a hunting lodge." Follow up needed: *"So, we are considering a substantial regulation change to prohibit some Alaska resident hunters because of the possibility of a hunting lodge?"*

These are a few of the comments made by 5 hunters that reside in Pelican; none of the comments were questioned. A sixth person that hunts deer and testified abstained from supporting this proposal. There are more than 5 Pelican residents that hunt deer after October 15th; their lack of testimony is a result of not being notified of this proposal or because they did not want to be involved in a controversial subject with their fellow residents by voting against it.

I will submit the issue of a hunting lodge was a scare tactic used to cause some residents to testify. Consider the economics of out of state hunters coming to Pelican:

- Airfare from Juneau is over \$400.00 round trip with a 50 pound baggage limit, \$1.10 per pound overage.
- Alaska non-resident hunting license \$160.00
- Alaska non-resident deer tag \$300.00

This would amount to \$860.00 for the opportunity to bag an average 90# deer and that is before any local lodging costs are added.

Would there be a market for Alaska resident hunters? Again, there is the expense of getting the hunters from Juneau to Pelican; over \$400.00 round trip. Then, the uncertainty of air travel. From mid-October on the weather & shorter daylight hours makes flying to and from Pelican anything but a sure thing. A person may not get to Pelican for a week or once here, may not leave for an extra week. The prospective hunting lodge will have to consider the costs of extra insurance for hunters, possible weather cancellations, possible extra cost of weather preventing

clients from departing, and the liability of hunters in a new area containing unforgiving conditions. The issue of a deer hunting lodge was a useful tool for a person wanting to limit any resident hunters coming to the area.

Are there a large number of Alaska resident hunters that travel to Pelican to hunt deer? No, depending on the definition of "a large number". Looking back at 2020 I can count a total of 18 between October 1 to December 15; these were spread out over that time. There is a group from Haines that travel to Elfin Cove and then hunt from a commercial fishing boat and concentrate their activity at Idaho Inlet, Port Althorp, and outside of Yakobi Island. The Haines group attract attention in Pelican as they end their trip here and catch a ferry back to Juneau; the Federal proposal will not affect them as they are from a rural community.

Where do the Alaska resident hunters stay when they come to Pelican? Five of these 1 to 4 person groups stay with a property owner outside the city limits. The owner purchased State DNR land in one of the land disposal programs and invested thousands of dollars in building houses on their lots. Often the houses were built by hiring workers from Pelican. These owners contribute to the local economy by purchasing airfare, ferry fare, gasoline, and other items in Pelican. Some of these hunters are relatives of the property owner who in turn is a Pelican resident; they have hunted in the area for decades. Other hunters either stay with relatives or friends in town or in a house they own within the city limits.

Is there a shortage of deer in the proposal area? No. The ADF&G data will show there are plenty of deer. Success rate for local hunters has not diminished over time; in fact it has increased. The 2020 season was remarkable for poor weather conditions and an abundance of brown bear. The difficulty many hunters faced in locating deer was not unique to the Pelican area; it was a complaint I heard from other hunters in Northern Southeast.

Will this proposal improve the hunting success for Pelican residents? No, it likely will make it more difficult. The proposal pertains only to Federal Lands, it has no effect on State or private land. State land is that portion of land below mean high tide and there are pockets of State land within the area. We can anticipate more boats running the beaches looking for deer, this will push the deer up the and make them more wary. Land owners outside the city limits can hunt on their land, many of these are 3 acres in size. Some of these private holdings are adjacent to the lands owned by proposal supporters; unless posted we can expect more unpleasant encounters between land owner and hunter.

Will this proposal affect the Haines group? No, they come from rural community. Only hunters from Juneau or Ketchikan in Southeast and any other community in the rest of Alaska will be restricted. Sitka hunters will also not be affected.

My final remark is that if a commercial deer hunting lodge were to be started, I would oppose it with every legal remedy available. I believe we can recommend changes within the ADF&G to make commercial deer harvest operations even less economical.

Sincerely:

Norm Carson  
PO Box 98  
Pelican, AK 99832

ph: 541-361-5272 or cell 907-321-1950  
email: [ncarson@att.net](mailto:ncarson@att.net)

June 29, 2021

Linda Carson  
PO Box 98  
Pelican, Alaska 99832

Federal Subsistence Board  
State of Alaska

RE: WP22-09, Lisianski Inlet Deer

I was born in Alaska and Pelican has been my home since 1997. My husband and I reside off grid about 3 miles south of Pelican. We have two sons, one lives in Juneau and the other Delta. Both of our sons learned to hunt with their father and grandparents in this area.

WP22-09 would restrict deer hunting in our area after October 15th to only those residents that meet the qualifications for a Rural Federally Qualified hunter. Only two communities in Southeast Alaska do not meet the RFQ standard, Juneau and Ketchikan.

A recent study by the Alaska Department of Fish & Game states the deer population in our area is not at all threatened; there is no conservation issue. Further, the study shows that subsistence hunters in our area are more successful now than in previous years.

This spring we have seen many deer around our local beaches. The fall & early winter of 2020 was unusual in weather; it was very windy and warm. There was not an early snow pack to bring the deer down to lower elevations; this had a detrimental effect on hunting.

WP22-09 should not be passed.

Linda Carson  
lcarson@att.net

7/21/2021

Mail - AK Subsistence, FW: - Outlook

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

Kelly Cates &lt;kacates@alaska.edu&gt;

Mon 5/15/2021 9:31 PM

To: AK Subsistence, FW: &lt;subsistence@fw.gov&gt;

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

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 FQUs 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

Green Building Division, University of Alaska Fairbanks

[kacates@alaska.edu](mailto:kacates@alaska.edu) (907) 457-5022

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

~~~~~

<http://us01ack-dm5e-03-com.mail.us.fed-express.com/tw/ga/mbox/5BANCADZJHBEZMGRWVWV3TgHDDQY0GD4YJ2xLW29fzY0FWWDMH/ZQAGAE>

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 &lt;subsistence@fws.gov&gt;

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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 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

Steve Christensen  
509-543-8458  
Email: FinnFinn2018@gmail.com

Federal Reserve Board  
Alaska Region

RE: WP22-09  
Lisianski Deer Restriction

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

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

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

WP22-09 would restrict deer hunting in the Lisianski area after October 15th to only those residents meeting the qualifications for a Rural Qualified Hunter. Only the residents of two communities in Southeast do not meet the rural standard; those would be of Juneau and Ketchikan.

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

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

I ask that WP22-09 not be passed.

Sincerely,

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

6/14/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-09 SE Deer 4 Closure to non-Federally qualified users, Lisianski Strait

denny corbin &lt;dennycorbin.dc@gmail.com&gt;

Sun 6/13/2021 6:15 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

Cc: dhulen@adn.com &lt;dhulen@adn.com&gt;

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

Re: WP22-09 SE Deer 4 Closure to non-Federally qualified users, Lisianski Strait

This proposal is ridiculous. The deer population is in fine shape as per analysis by Alaska Department of Fish and Game deer management biologists. The number of hunters has decreased (mostly the subsistence qualified hunters have decreased due to a poor economy forcing the majority of younger people who grew up here to move away in search of work). The harvest limit has been raised over last few years as there are so many deer and success rate per days hunted has increased over the last decade. According to game management biologists the deer population is at carrying capacity. In my opinion failure to harvest deer by a very few people living in the area is due not from competition but from not wanting to hike to the high country where deer have been staying because warmer winters and increased bear population that haven't been hibernating like normal from low snowfalls for most of the winter. This bear activity all winter keeps the deer on the defensive, sticking to high ground and extra sneaky.

I grew up in Lisianski Inlet a few miles outside of Pelican. My family subsisted heavily on deer and I can remember my mother telling me not to come home without a deer. I learned quickly how to catch a deer and sometimes it takes hard work. Due to the loss of economic opportunities in the area (from government over-regulation I might add) I was forced to spend my winters in southern California commercial fishing squid in order to support my young family. I still spend summers in Lisianski Inlet operating my families homestead as a fishing lodge. I maintain Alaska residency but purchase a non-resident hunting license as cheap insurance to keep enforcement from attempting Law-fare shake downs, taking me to court and forcing me to spend a lot of money proving I still intend to remain an Alaska resident. At some point I would like to come home from the (economic) war and hunt the November rut with my children in the area that I hunted with my father. This is an important cultural and traditional point for me, yes, based mostly on nostalgia, but valid all the same.

This proposed new law will shut out many people who grew up in Lisianski and who's families have long history of hunting there. It will make outlaws of people who have traditionally hunted the area for generations simply because they cannot make a living around Pelican anymore and needed to move part of the year to another location in order to survive. Parents and grandparents who still live in Lisianski will be denied the pleasure of hunting the November rut and first snowfall (which by the way is the very best of the deer hunting over the entire season) with their children who were forced to

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/d/AAGkADZINDE2M2RhLWwOTgtNDQ1OjS04YjQxLWE0YzY0NWl3MDNjZQAQAH7v...> 1/2

6/14/2021

Mail - AK Subsistence, FW7 - Outlook

move away and they will be denied teaching their grandchildren how to hunt in the traditional area that their families have hunted for generations. The grandchildren will lose an important link to their traditional and ancestral home when they are not allowed to learn how to hunt with their parents and grandparents.

This area is sadly turning into a summer home vacation spot for wealthy retirees. Southeast Alaska has seen its share of economic hardships over the last 30 years, with pulp mills shutting down, the IFQ program for halibut and black cod making 2nd class citizens out of many young (now not so young) fishermen, salmon farms and increased federal regulations driving down the price of salmon and shortening the season making it nearly impossible to make a living as a commercial fisherman. We've suffered enough. We do not need the Federal Government telling us who can and can't take a deer for personal use. The motivations of the few people who support this proposal are varied but in my opinion none are valid or based on any knowledge of deer harvest number or really any hard knowledge at all of deer management in the area.

The US government should not be required to guarantee anyone deer hunting success and deer hunters who have a long tradition and family history, and who maintain homes in this area should not be made outlaws for harvesting deer around their homes. Legal liability is only one part of a successful game management system. Respect for the law and for law enforcement plays a much larger role than fear of reprisal. When stupid laws are made by stupid people the rest of us look on in disgust and lose respect for the system.

Think carefully before forcing through a new feel good (for some) regulation that is not supported by the majority of residents.

Denny Corbin, Lot 17 & 18 Sunnyside  
PO Box 765  
Pelican, Alaska  
99632

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/d/AAGkADZINDE2M2RhLWwOTgtNDQ1OjS04YjQxLWE0YzY0NW13MDNjZQAQA7v...> 2/2

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/AAQkADZINDE2M2RhLWVOTgtNDQ1OjS04YjQxLWE0YzY0NW13MDNjZGAGAHD...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] I strongly oppose proposal WP22-09 SE

Tom Crass <tomcrass@gmail.com>

Sun 7/18/2021 1:28 PM

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

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WP22-09 Lisianski Subsistence Deer Hunting Restrictions.

There is no reason for this federal subsistence proposal. My family hunt and hike the hills in the proposed area and have done so for over twenty years. We have not seen a decrease in the deer population, and city of Pelican was approximately 300 people when we first bought our house there, it is currently 60 people. I do not suspect that the deer population is in danger from a few hunters from the surrounding areas (including Juneau) it is expensive and difficult to travel to Pelican particularly in the fall. The cost and difficulty will keep most out and the black tail deer is not a trophy animal this is not a serious issue.

Tom Crass  
PO Box 302  
Pelican Alaska 99832

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWWOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZGAGAOF...> 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

1/10/2001

NAB - AN Subversion FW7 - Outbox

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

John Demuth <jdemuth@pdengineers.com>

Webb/46,2021 - 46 PM

To: AK Substance, FWT <substance@fw.gov>

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**Advertiser:** 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 Inupiat 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

<http://dx.doi.org/10.1016/j.jmb.2010.08.016>

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

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

Jared Erickson &lt;erickson\_jared@yahoo.com&gt;

Sat 7/17/2021 7:43 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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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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16/05/2019

Mail - Air, Submarine, 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

<http://code.google.com/p/criminalliterature.org/files/gadbois/AAACKADZNDJEZVZRMiWW3TfMnDQ10SHY/DtLWE0fzY0FWWQNMZLOADAh>

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/AAQkADZINDE2M2RnLWVOTgtNDQ1OS04YjQxLWE0YzY0NW13MDNjZQAQAPIS...> 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>

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

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/dAAQkADZINDE2M2RhLWVOTgtNDQ1OjS04YjGxLWE0YzY0NW13MDNjZQAGAMg5...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

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

Charles Frey &lt;cfrey09@gmail.com&gt;

Fri 7/16/2021 3:36 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

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

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWWOTgtNDQ1OjS04YjQxLWE0YzY0NWl3MDNjZQAQAipV...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WS22-09

Ben Genz <bengenz@yahoo.com>

Mon 7/19/2021 7:43 AM

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

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I am opposed to this proposal as 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 that non-subsistence hunters are affecting the federally-qualified subsistence hunters ability to harvest deer.

Federal Regulations require 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.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlUWOTgtNDQ1OjS04YjQxLWE0YzY0NWl3MDNjZGAGANBq...> 1/1

## Introduction

May - PK Surveillance, FWI - Outlook

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

Mary Graves <Mare\_e86@hotmail.com>

Nov 15 (Fri) 1:24 PM

For AK Substance, FWY: <substance@fwy.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. EQUs 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 Junau and Ketchikan residents. ADF&G assessments for all units to do support these proposals. I, also, do not support them.

Mass e-mails:

http://www.elsevier.com/locate/jmb. For full access to this journal please go to <http://www.elsevier.com/locate/jmb>. For full access to this journal please go to <http://www.elsevier.com/locate/jmb>.



Post Office Box 32712 • Juneau, Alaska 99803

Telephone: (907) 786-2399 • Fax: (907) 586-0281

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 Chikilago 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 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 & Ketikikan residents, as well as non-residents.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn Hinton".

Shawn Hinton  
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 &lt;subsistence@fws.gov&gt;

 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;

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

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/AAQkADZINDE2M2RhlWVOTgthNDQ1OjS04YjGxLWE0YzY0NWl3MDNjZQAGAMZ...> 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>

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

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, FW: - Outlook

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

Brandon Ivanowicz &lt;bivanowicz@pndengineers.com&gt;

Mon 5/15/2021 4:11 PM

To: AK Subsistence, FW: &lt;subsistence@fws.gov&gt;

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

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](#)

<http://outlook.officeapps.com/mail/watermark.aspx?mailbox=AKSUBSISTENCE@FWS.GOV&ADZINFEZMGRHWWOTG#DQ10SDHY/DxLW2fYzY0WVOMD74ZQACAPR> 1/1

7/21/2021

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

Navigation

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5 min read

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

Posted on July 27, 2021 by territorialsportsmen | 1 comment

 Comments on these are due by this Monday, July 19, 2021 (email: [subsistence@fws.gov](mailto: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/>

1/1

1/21/2021 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 1C, 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 surprised, 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

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-09

greg-donica@gci.net &lt;greg-donica@gci.net&gt;

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>

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

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

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/d/AAGkADZINDE2M2RnLWwOTgtNDQ1O504YjQxLWE0YzY0NW13MDNjZQAQAKD...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

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

Jones Chiropractic &lt;akchiro@gmail.com&gt;

Mon 7/19/2021 10:34 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

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/AAQkADZINDE2M2RhlWWOTgtNDQ1OjS04YjQxLWE0YzY0NW13MDNjZGAGAJov...> 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>

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

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/AAQkADZINDE2M2RhlWVOTgtNDQ1OjS04YjQxLWE0YzY0NWl3MDNjZGAGAAj7...> 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=20210626001.07>

1/1

7/2/2021

Mail - AK Subsistence, FW7 - Outlook

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

Chris klawonn &lt;chris.klawonn@gmail.com&gt;

Fri 7/2/2021 7:18 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

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] WP22-09 Deer Hunting Restrictions Lisianski Inlet

Jerome <rnjk8@gcl.net>

Sun 7/18/2021 7:39 AM

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

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Hello,

My name is Jerome A Kristjanson, I have been an owner and occupant of property next door to Jim Slater and have noted the abundance of deer in my yard at various times of the season. I have noted bucks and does in my yard and this has been consistent, not just one or two a month. There are fresh sign weekly from the ones I do not see physically.

I do not hunt, I do feel my neighbors in Juneau (that own or have permission to hunt in the Inlet) and Pelican have the right to harvest legally.

Those that do not wish to share should find other interests to engage in.

Jerome A Kristjanson

14 Salmon Way

Pelican AK 99832

907-723-2863

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWVOTgtNDQ1OjS04YjQxLWE0YzY0NWl3MDNjZGAGAN&...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Object to Proposals**

Jay/Amy Lloyd &lt;jayamylloyd@gmail.com&gt;

Mon 7/19/2021 12:28 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

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/AAQkADZINDE2M2RhlWWOTgtNDQ1OjS04YjQxLWE0YzY0NWl3MDNjZQAQALX...> 1/1

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-09 Lisianski Deer Hunting Restrictions

Greg Lockwood <greenhoochie@icloud.com>

Tue 7/13/2021 5:15 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.

I oppose the new restrictions as proposed in WP22-09. I have a cabin along Lisianski inlet but I am not currently a qualified subsistence user. However, hunting is an important part of my Alaskan lifestyle as well as of my children's. We hunt every year together and we are looking forward to many memories of hunting in the Lisianski area.

Additionally, we rely on the health benefits of wild game meat vs store bought meat. I lost my wife 5 years ago to cancer and my children and I work hard to maintain as healthy of a lifestyle as possible. The proposed change will impact our ability to continue to do this.

I personally do not believe the deer herd is substantially impacted by non-subsistence qualified hunters harvesting deer in the Lisianski area and I also believe the proposed change would result in a waste of a resource. I request that a scientific study be performed before making a change that negatively affects some of Alaska's residents.

Thanks,  
Gregory Lockwood  
Juneau AK

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RnLWwOTgtNDQ1OjS04YjQxLWE0YzY0NW13MDNjZGAGAPSz...> 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

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Public comments for WP22-09

Chris Lunsford &lt;clunsford1@gmail.com&gt;

Mon 7/19/2021 12:56 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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July 16, 2021

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

I am writing this letter in opposition to WP22-09. I'm a 40+ year Alaskan resident who values what it means to be an Alaska resident. As a child I grew up in Bristol Bay in the 1970's living a subsistence-based lifestyle. I currently reside in Juneau, a non-subsistence eligible community, but still maintain a subsistence lifestyle cherishing the opportunity to harvest the fish and game resources in Alaska. I have hunted the Pelican area for over 15 years and the effects of this proposal would severely affect my ability to harvest deer in Alaska.

The fish and game resources in Alaska are managed for Alaskans by the State of Alaska. Management authority is granted to the Alaska Department of Fish and Game which actively monitors deer populations in Southeast. There is no scientific evidence of a conservation issue for the deer population in Lisianski Inlet. There is also no evidence to suggest changes in effort, harvest, or environmental drivers warrant the need for additional management actions to limit harvest.

In the case of WP22-09, the Southeast Alaska Subsistence Advisory Council failed in its mission to provide meaningful advice to the Federal Subsistence Board. Little to no effort was made to evaluate the claims of this proposal against existing science-based knowledge or to discuss alternative less-restrictive management measures to achieve the proposal's goals. I believe you will receive overwhelming public comment to not support this proposal based on these principles. I encourage the Advisory Council to fully evaluate all proposals before moving forward to the Board to ensure all subsistence users and Alaskans are fairly represented.

Residents who reside in remote villages in Alaska should be offered the opportunity to harvest the State's fish and game resources to the extent possible to ensure a successful subsistence lifestyle. In Southeast Alaska and Lisianski Inlet, this subsistence accommodation for deer includes additional tags (currently six tags) and additional time to hunt (currently January 1-31), which non-subsistence eligible hunters do not qualify for. Until there is scientific justification and overwhelming support to limit deer harvest in Lisianski Inlet, the Federal Subsistence Board should not be taking further action to favor subsistence users.

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

I urge to Board to not support WP22-09 based on, 1) available scientific evidence indicates the deer population in Lisianski Inlet is healthy; 2) the current effort and harvest levels in Lisianski Inlet are stable; and, 3) there are current subsistence regulations in place to ensure successful subsistence deer hunting can occur in Southeast Alaska including Lisianski Inlet.

Sincerely,

Chris Lunsford

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWWOTgtNDQ1OjS04YjGxLWE0YzY0NWl3MDNjZQAQAF%...> 2/2

7/19/2021

Mail - Pk. Substances, FW/ - Oxytocin

[EXTERNAL] Wildlife Proposal - 22-09 - Lisianski

Carmen Magnuson <ckcolacj@hotmail.com>

DOI: 10.1002/for

Re: AK Substance, FW: "substance@lhw.gov"

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We would like to submit a comment on the above proposal regarding deer hunting in Lisianski Inlet. As Alaskan residents and a public land users, we would like to say, restricting public land from the public is ridiculous just because one rich man wants it all to himself. There is no evidence in the proposal that supports the claim of low deer numbers or hunting success in that area and how such a proposal made it to this point is ridiculous. There is more than enough resources for everyone to share. My family has a cabin out there and has been hunting there for over 30 years. We would be shocked and appalled if such a proposal passed and that would bring many more questions and suspicions about how such a decision came to pass.

We strongly oppose this proposal and look forward to the failure of it as it should.

Thank you for your time.

Aaron and Carmen Magnusen  
Auke Bay, Alaska

Sent from Mail for Windows. (1)

<http://dx.doi.org/10.1016/j.mbs.2015.07.004>

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-09

jenandpat@gci.net &lt;jenandpat@gci.net&gt;

Mon 7/19/2021 5:14 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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July 19, 2021

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

Dear Federal Subsistence Board,

I am writing this letter in strong opposition to WP22-09.

I am an Alaskan resident who has hunted in Southeast Alaska since 1995. I currently reside in Juneau but for many years I lived remote on Baranof Island, living a subsistence lifestyle that made me sympathetic to the associated hardships. Over the last 13 years, I have hunted Lisianski Inlet and the surrounding areas with my best friend, who is a property owner in Lisianski Inlet. Our hunting trips usually take place in December, when our work schedules allow us a short amount of free time from our jobs in Juneau. As I am now a non-federally qualified user (NFQU), WP22-09 would restrict me from hunting between October 15 – December 31 in Lisianski Inlet, Lisianski Strait, and Stag Bay. I believe this proposal is misguided, misinformed and would unfairly exclude Alaskan residents from hunting a healthy and sustainable population of deer. The proposal asserts that the deer population is depressed and that it is more difficult harvesting deer than it used to be because the number of NFQU hunting in the area is higher. The data that ADFG collects shows that each of these points are incorrect.

The proposal states:

1. It has become more challenging for subsistence hunters to harvest sufficient deer.
2. Hunting pressure from non-subsistence hunters has risen.
3. The deer population is depleted.

According to ADFG statistics:

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

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7/21/2021

Mail - AK Subsistence, FW7 - Outlook

When comparing the facts with the assertions, it is clear that the basis for the proposal is flawed: FQU hunters are harvesting more deer per hunter and are more efficient than in previous years; the number of NFQU hunters is not increasing; and there is not a deer conservation concern in the proposed area. Considering the inaccuracy of the proposal's assertions, it begs the question of the motivations of the proposer and perhaps indicates other considerations, unrelated to conservation or subsistence needs, may be at play.

I strongly encourage the Federal Subsistence Board to do its due diligence and look at the facts and reject WP22-09. Without careful review of the best available ADFG data, making any decisions would be inappropriate and reactionary. If the proposal were approved as-is, it would unnecessarily and unfairly restrict hunting opportunities for Alaskan residents who cherish the opportunity to hunt and its sustaining results.

Thank you for your consideration,

Patrick Malecha

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWWOTgtNDQ1OS04YjQxLWE0YzY0NW13MDNlZQAGAJ56...> 2/2



**BACKCOUNTRY  
HUNTERS & ANGLERS**  
ALASKA

## **Alaska Backcountry Hunters & Anglers Comments on Wildlife Proposal 22-07 and Wildlife Proposal 22-09**

### **Proposed Change to Federal Regulation:**

*"Federal public lands of Admiralty Island draining into Chatham Strait between Point Menden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users hunting under these regulations."*

Backcountry Hunters & Anglers advocates for an ecosystem wide approach to land and wildlife management and to ensure that the public landscapes we speak up for remain open to hunting and angling. We are supportive of science-based management decisions and support the responsibility of state wildlife agencies to manage fish and wildlife populations on public and private land. We support and strongly encourage cooperation between state and federal management agencies to maintain robust fish and wildlife populations on Federal public land.

Alaska BHA has reviewed the proposals submitted by the Southeast Subsistence Regional Advisory Council (SRAC), the meeting transcripts, as well as hunter participation, harvest and population data provided by the Alaska Department of Fish and Game. We recommend the Federal Subsistence Board oppose the proposed closure of Federal public lands to hunting of deer by non-federally qualified users. Alaska BHA does not see that there is adequate information related to deer populations and harvest to meet the high burden needed to close Federal public lands or that these proposed closures will necessarily solve the problems identified by the SRAC.

Although we are opposing this proposal, Alaska BHA would like to bring up concerns that we have, some of which were expressed by the Council:

1. The Council expressed concern in the spring meetings that there is a limited selection of tools available for them to use to address their concerns. Several members expressed hesitancy over supporting these proposals due to their concern that they did not necessarily want to limit non-federally qualified users but lacked any other options.
  - a. Alaska BHA would like to express our support of the Council in this regard and we would take this opportunity to support and encourage the concept of agency co-management. We understand the unique situation of subsistence management in Alaska and believe this situation calls for a stronger working relationship between state and federal agencies than is needed in other states where federal agencies are charged with managing habitat on federal land. An uncooperative relationship between state and federal agencies, as has been recently demonstrated in Alaska by ongoing litigation, leaves hunters and anglers to pay the price, regardless of federal status.
2. Data provided by the Alaska Department of Fish and Game shows that participation by federally qualified users (FQUs) and non-federally qualified users (NFQUs) has been decreasing but that FQUs participation is decreasing at a higher rate.
  - a. Alaska BHA believes that the OSM and ADF&G Subsistence Section should be conducting more surveys to better understand why this decrease is



WWW.BACKCOUNTRYHUNTERS.ORG/ALASKA\_BHA  
ALASKA@BACKCOUNTRYHUNTERS.ORG

occurring, particularly when Federal land closures are involved. Factors far outside the realm of deer populations and hunt management can affect participation in a hunt and should be considered.

- b. We would like to make the secondary point that decreasing participation rates among hunters and anglers is a concern of our organization. Our Hunting for Sustainability program is focused on ensuring we have future generations of hunters who will speak up on behalf of our lands, waters and wildlife. We do not want people to stop hunting and fishing, regardless of federal status.
3. Alaska BHA heard from both FQUs and NFQUs who share frustrations about waste of game in areas that receive higher hunting pressure, specifically around the Hoonah road system. When game is wasted it takes away present and future opportunities for both NFQUs and FQUs to put food in their freezers. We encourage Federal and State law enforcement agencies to increase enforcement of existing laws and work with local communities to identify illegal hunting activity.
4. Backcountry Hunters & Anglers was founded around the need for an organization of hunters and anglers to speak up for an ecosystem wide practice of conservation. The Council discussed several concerns leading up to these proposals that Alaska BHA, out of our concern for ecosystem wide conservation, believes are relevant.
  - a. A general reduction in other available resources causes strain on hunters and anglers, especially those who depend more upon food harvested from the land. Reduced salmon and herring runs means less available opportunities to harvest additional food and increases the need to harvest the food that is available, in this case deer.
  - b. Reduction in resources that other animals depend on increases competition. For example: bears, dependant on robust and healthy salmon runs that are now less consistent, may target more deer and thereby make deer more difficult to harvest.
  - c. We share the frustrations of the Council, and many other Alaskans, over the issue of commercial trawl bycatch when many opportunities around the state to harvest halibut, salmon and other fish to put in our freezers are being limited. This increases strain on both FQUs and NFQUs.
5. Alaska BHA strongly emphasizes the need for these issues to be addressed and would like to remind both State and Federal agencies of your obligations to manage for subsistence priority, regardless of your definition of user group.

As an organization that counts both federally qualified users (FQUs) and non-federally qualified users (NFQUs) among our ranks, the Alaska Chapter of Backcountry Hunters and Anglers would like to offer our assistance in facilitating long-term solutions to the problems addressed by the Council.



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ALASKA@BACKCOUNTRYHUNTERS.ORG

6/09/2021

Mail - AK Subsistence, FW: - Outlook

[EXTERNAL] Southeast proposed subsistence deer limitations

Charlie Martelle &lt;martellec@yahoo.com&gt;

Tue 6/09/2021 10:29 PM

To: AK Subsistence, FW: &lt;subsistence@fw.gov&gt;

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

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](#)

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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

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

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

Grey Mitchell &lt;fullcurl@live.com&gt;

Wed 7/14/2021 9:04 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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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

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

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

Richard Morris &lt;akreeldeal@gmail.com&gt;

Mon 7/19/2021 8:40 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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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. It is 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/AAQkADZINDE2M2RhlWWOTgtNDQ1OjS04YjQxLWE0YzY0NW13MDNjZGAGAN1n...> 2/2

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

**[EXTERNAL] Comments on WP22-09**

Jamal Moss &lt;jamalmoss@gmail.com&gt;

Fri 7/16/2021 8:32 PM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

Cc: Jamal Moss &lt;jamalmoss@gmail.com&gt;

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July 16, 2021

Federal Subsistence Board - Attn: Theo Matuskowitz

Office of Subsistence Management

1011 East Tudor Road, MS-121

Anchorage, AK 99503-6199

I am writing this letter in opposition to WP22-09. I'm an Alaskan resident who has owned a home just outside of Pelican since 2006 but spent the majority of the year in Juneau because of my job. I have been hunting Lisianski Inlet and Lisianski Strait since 2006. The current proposal restricting deer hunting in Lisianski Inlet only represents the view of a select few and is not based on the data ADF&G collects to manage the resource.

The deer population in Lisianski Inlet and Lisianski Strait rises and falls with some years proving more abundant than others. The amount of deer I encounter in a given year appears to have more to do with the amount of snowfall and inclement weather than anything else. Heavy snowfall forces deer to lower elevations, making them easier to harvest, which increases mortality. However, I have found it relatively easy to harvest deer in years following heavy snowfall years, which gives me confidence that the deer population in Lisianski Inlet and Lisianski Strait is healthy.

Access to the hunting grounds that I have enjoyed for almost 2 decades would be severed under WP22-09 which would have an extremely negative impact on me. It is my firm belief that the deer population in Pelican is not threatened. It appears that ADF&G does not believe this population is threatened either, as the bag limit for this area last year was 6 deer per hunter. I encourage the federal subsistence board to review the science, consider ADF&G's assessment of the deer population in Lisianski Inlet and Lisianski Strait, and reject WP22-09. There is no

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

data suggesting that the deer population is in jeopardy or that hunting pressure has increased over the past several years.

Sincerely,

Jamal H. Moss

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWWOTgtNDQ1OS04YjQxLWE0YzY0NW13MDNjZQAGAAAn8...> 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/AAGkADZINDE2M2RhLWVOTgtNDQ1OjS04YjQxLWE0YzY0NWl3MDNjZQAGABsq...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-08 comments

nicholasporr &lt;nicholasporr@yahoo.com&gt;

Sun 7/18/2021 11:34 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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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/AAQkADZINDE2M2RhlWWOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZGAGAEgr...> 1/1

7460271

Mail - Pk Subscriptions, FW7 - Outlook

[EXTERNAL] FEDERAL SUBSISTENCE BOARD STATE OF ALASKA WP22-99 LISIANSKI  
INLET DEER HUNTING

Mini Reink <mreink38@gmail.com>

See 1982/2019: 1131-1139

File: *AK\_Substance\_FW7* ([substance-fw7.qxd](#))

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Although I have only been a resident of Pelican since 1998 this has become a very dear home to us and the families that live here. These families also have others who live in extended areas ex Juneau.

Should WP22-09 PASS this would restrict deer hunting in our area after October 15th to only those residents that meet the qualifications for a Rural Federally Qualified Hunter. Only two communities in SE Alaska do not meet the RFQ standard, Juneau and Ketchikan.

ADF&G states the deer population in our area is not at all threatened, there is no conservation issue. Further, the study shows that subsistence hunters in our area are more successful now than in previous years.

This spring we have seen many deer around our local beaches. The fall & early winter of 2020 was unusual in weather; it was very wind & warm. There was not an early snow pack to bring the deer down to lower elevations; this had a detrimental effect on hunting.

WP22-09 SHOULD NOT BE PASSED

Mini & Tom Reink  
mreink38@gmail.com

<http://dx.doi.org/10.1016/j.mbs.2014.07.005>



**unapologetically FOR ALASKAN RESIDENTS**

PO Box 60095, Fairbanks, Alaska 99706 (907) 374-7436  
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

July 19, 2021

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

Re: Federal Subsistence Board 2022-2024 Wildlife Proposals and Existing Closures

Dear Federal Subsistence Board Members,

Resident Hunters of Alaska (RHAK) represents several thousand members from across the state, rural and urban, who advocate for sustainable wildlife management policies and a resident hunting priority according to Article 8 of our state constitution.

RHAK participates in Regional Advisory Council (RAC) meetings and Federal Subsistence Board (FSB) meetings, and we have become alarmed at the continuing wildlife proposals and special action requests that are not based on actual biological emergencies or conditions that would prevent federally qualified subsistence users (FQU) from meeting their subsistence needs.

What makes any FSB closures and restrictions especially problematic is that there is no differentiation in the federal system between Alaska residents and nonresidents from another state or country; both Alaska residents and nonresidents are deemed the same under federal regulations by definition of a who is a FQU. A prime example of why this is so problematic is that often complaints about competition from non-local non-federally qualified subsistence users (NFQU) center on the nonresident component, which can often comprise the majority of NFQ hunters participating in these hunts. So, when any restrictions or closures on federal lands happen, Alaskans who used to live in a designated rural area but for whatever reason have moved to more urban areas of the state, can't return home to hunt and carry on their traditional hunting activities on federal lands, nor can other Alaskans participate in these hunts.

It has always been RHAK's position that when and where we have wildlife conservation concerns or subsistence opportunities are not being met, that the **nonresident component should always be the first group of hunters**

Page 1 of 3

*Resident Hunters of Alaska Comments  
Federal Subsistence Board 2022-2024 Wildlife Proposals & Existing Closures*

**restricted.** If other restrictions are still necessary, only then can we support restrictions on resident hunters.

We have always advised RACs to first use the Board of Game (BOG) process when and where there are concerns with too much competition from non-local NFQ hunters, as the BOG can differentiate between Alaska residents and nonresidents.

### **Comments on Individual Proposals and Existing Closures**

**WP22-07** Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users hunting under these regulations.

#### **OPPOSE**

The rationale of WP22-07 is not based on any biological data or harvest statistics that show a conservation concern for the deer population on Admiralty Island or that subsistence needs are not being met.

According to Alaska Department of Fish & Game (ADF&G) data, over the last decade we have had mild winters in Game Management Unit-4 and the deer population is "high and stable." The deer population on western Admiralty Island is **not** depleted, as the proposal states. Nor are there any conservation concerns for the deer population under the current hunting regulations.

The proposal also states that there has been increased "hunting pressure" from NFQ hunters and it has "become more challenging for subsistence hunters in Angoon to harvest sufficient deer for their needs." But according to ADF&G data, over the last two decades there has been a **decrease** in both the number of FQU and NFQU.

The FSB operates under ANILCA guidelines and the federal code of regulations that govern when and why any closures to NFQU can happen: "With respect to subsistence uses of a particular fish or wildlife population, the Board may only approve a proposed closure if necessary for reasons of public safety, administration, or to assure the continued viability of such population (ANILCA 5816(b), 36 CFR 242.10(d)(4)(vii) and 50 CFR 100.10(d)(4)(vii)). **Meanwhile, the Board may approve a proposed closure of nonsubsistence uses of a particular fish or wildlife population for any of these same reasons, or if necessary for the conservation of healthy populations of fish and wildlife,**

Page 2 of 3

Resident Hunters of Alaska Comments  
Federal Subsistence Board 2022-2024 Wildlife Proposals & Existing Closures

**or to continue subsistence uses of such population (ANILCA 5815(3), 36 CFR 242.10(d)(4)(vi) and 50 CFR 100.10(d)(4)(vi)).<sup>1</sup>**

The Board should vote down this proposal based on the above guidelines of when any restrictions or closures on federal lands for NFQU are allowed to happen.

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**WP22-09** Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) are closed to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users hunting under these regulations.

**OPPOSE**

Refer to our comments on WP22-07

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**WCR22-01 Deer** Prince of Wales closed Aug. 1-15, except by Federally qualified subsistence users; non- Federally qualified users may only harvest 2 bucks

**Rescind closure to NFQU on Price of Wales Island**

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**WCR22-45 Caribou** Unit 23 – Portions of Unit 23 – closed to non- Federally qualified users

**Rescind closure to NFQU in those portions of Unit 23**

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Thank you for the opportunity to comment,

Sincerely,

Mark Richards  
Executive Director Resident Hunters of Alaska

6/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wp22-09 and WP22-10 comments

Shane Ring &lt;shane@apexlodge.com&gt;

Fri 6/18/2021 7:10 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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

I'm writing to oppose the new proposed regulations for Lisianski inlet WP22-09 and WP22-10.

I am a resident of Pelican and actively hunt in the area every year.

For one, the smaller harvests are less due to shortages of deer. And more of a lack of snow problem.

Residents of Pelican, for the most part, hunt and shoot deer from their skiffs or front porches. Only a few actively hike, and target them in the forest.

The first heavy snow pushes deer to the waters edge. But that hasn't happened during the hunting season the last few years. Thus a lower harvest.

Secondly, there is a very large amount of aging, older, former residents of Pelican who come and hunt the area every year in the fall. Who keep places in Pelican, but have their main homes in Juneau for health reasons. I think it would be immoral to take those opportunities away. As fall is the easiest hunting for them.

Thirdly, the residents of Pelican do not rely on deer meat to survive through the winter. We are on the AMHS, and get grocery runs on a monthly basis. Yes it's popular, but if there was no deer hunting, they would be just fine.

Fourthly, I myself, and many others, do not want to have extra hoops to jump through with federal regulations and oversight. It makes things overly complicated.

Lastly, these proposals have been pushed by the wealthier residents of the area who do not like anyone visiting. And would do away with all tourism (hunting, fishing, or otherwise) if they had the opportunity to do so.

There is literally zero business that goes on during that time of year otherwise, and would bring less visitors to town. Less fuel dock sales, less people who visit and support the cafe and gift shop.

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6/21/2021

Mail - AK Subsistence, FW7 - Outlook

I would suggest a compromise, and that you ban non residents from hunting within 100 yards of the coastline after Oct 15.

This would keep boat hunters from Juneau, and other places, from driving around and shooting deer enmasse from their vessels. Competing with locals. But give opportunity to those who will work for it.

That's all,

Thanks,

Shane Ring

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhlWWOTgtNDQ1OjS04YjQxLWE0YzY0NW13MDNjZQAGADIC...> 2/2

July 1, 2021

To: Federal Subsistence Board, State of Alaska  
subsistence@fws.gov

Re: WP22-09, Lisianski Inlet Deer

My family and I have a summer/fall cabin down the Lisianski Inlet located near Phonograph Creek and we have enjoyed the beauty of the area since my in-laws first purchased the property in 1981. Since then we have made some major improvements to enable us to spend more time there with our children and grandchildren. Both of our children and now our grandchildren have learned to hunt with their parents and grandparents in this area.

WP 22-09 would restrict deer hunting to only those residents that meet the qualifications for a Rural Federally Qualified hunter. Juneau and Ketchikan are the only two communities in Southeast Alaska that do not meet the RFQ standard.

The Department of Fish and Game, who conducted a recent study, stated that the deer population in our area is not at all on the verge of being threatened. My family has been successful in this area for a number of years. In previous years the deer population was scattered due to the adverse weather conditions - windy and warm is not a good mix for deer hunting in the lower elevation areas.

Please do not pass WP22-09

Sincerely,  
Mary Robidoux  
PO Box 33099  
Juneau, Alaska 99803

6/21/2021

Mail - AK Subsistence, FW: - Outlook

[EXTERNAL] Re: WP 22-09 &amp; WP 22-10, GMU 4

Mary Robidoux &lt;maryrobidoux333@gmail.com&gt;

Mon 6/21/2021 8:23 AM

Re: AK Subsistence, FW: &lt;subsistence@fw.gov&gt;

Cc: Clay Robidoux &lt;rrobidoux@gmail.com&gt;

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

Hello – I wish to address Wildlife Proposal 22-09 and 22-10 in Game Management Unit 4 which is proposed for the Ulsinski Strait/Inlet and Pelican area.

Some background: My parents were lucky enough to purchase land in this area through a lottery draw in the early 1980s. Our site is listed as Lot 2, Blk 4 of Alaska State Land Survey #80-183, Phonograph Creek, containing approximately 2.5 acres. We constructed a cabin there and it became my parent's spring, summer and fall place of residence. In the late fall and winter months (August through December), we enjoyed hunting there too.

After my parents passed away, it became my family's summer and fall retreat with many enjoyable moments spent fishing and hunting with our children and grandchildren as our family grew.

Because we are residents of Juneau, the proposal would severely restrict our ability to hunt there during those months. Being able to pass down family traditions through hunting and fishing is very important to us. The proposal would affect this greatly.

As I mentioned above, my family enjoys all the outdoor activities that this area provides and we honestly have not seen a reduction in the number of deer population. It's my observation that there are more bears in the Phonograph Creek area, however, than there have been in the past.

Please do not change the regulation as it stands now as I believe allowing subsistence hunters to have that extra month (January) is more than sufficient to meet the needs of those whom this affects.

Sincerely,

Dwight Robidoux  
PO Box 33099  
Juneau, Alaska 99803  
(907) 209-6017  
[lr2@pci.net](mailto:lr2@pci.net)

https://portal.e-dms.doi.gov/mw/maintenance@fws.gov/bbox=5A0C9AD218E72627865503187400108249/2xLW29fzY0FW0C0M0Z0A0K02e 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 &lt;subsistence@fws.gov&gt;

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

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.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWMOTgtNDQ1OS04YjQxLWE0YzY0NWl3MDNjZGAGAOu...> 2/2

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>

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

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/AAQkADZiNDE2M2RhlWwOTgtNDQ1OjS04YjQxLWE0YzY0NW13MDNjZGAGAD6p...> 1/2

SCI Alaska Chapter  
Eagle River, Alaska 99577  
Cell (907) 903-8329  
Tel: (907) 980-9018  
[www.alaskafariclub.org](http://www.alaskafariclub.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.dhs.gov](https://subsistence.dhs.gov)

RE: SCI-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 (NFQUs) 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 1,957 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 use. "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. FQU 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 FQUs 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@alaskafarclub.org](mailto:president@alaskafarclub.org)  
Cell: (907) 230-0072

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

Response to 2022 Wildlife Proposed Regulation Change WP22-09

From: Al Steininger  
(907)209-8508  
al\_steininger@yahoo.com

Proposal WP22-09 would close deer hunting in Federal public lands draining into the waters in the Pelican area between October 15th and December 31st except by Federally qualified subsistence users. The reason given for this proposed change is that over the past years it has become more challenging for local subsistence users to meet their needs. This reasoning goes on to say that hunting pressure from non-subsistence hunters has increased.

This proposal should not be approved. There is not a conservation issue with deer populations in this area. The reasoning for this proposal did not provide any documentation of decreased deer populations. This reasoning is hearsay and contrary to studies by the Alaska Fish and Game (ADF&G) that state the deer population is high and stable in this area.

This proposal will restrict hunting access for the part time residents and cabin owners who are non-subsistence hunters. Many of these non-subsistence hunters are property owners, such as myself, who have homes and cabins in the Pelican area. I purchased the property in 2010 and finished building my cabin two years later. I am one of the most recent property owners to do so. Hunting pressure has not noticeably increased from non-subsistence hunters by local property owners. ADF&G found deer hunting effort and the potential for competition between subsistence hunters and non-subsistence hunters in this area has substantially declined, not increased.

I would like to think that part time residents and cabin owners help support the community of Pelican by employing local labor for building projects, paying for city services, eating at the local cafe, using commercial air travel services, supporting the AMHS ferry system, etc.

This proposal is possibly the result of a dispute between a full-time resident and a neighboring cabin owner who hunted unknowingly onto the other's property. If this is correct, this may have been avoided by the resident adequately posting his property.

This proposed change was made without documentation. In response to this proposal, ADF&G documented and indicated that deer populations are healthy and hunters in this area experience the most efficient deer hunting in Alaska and there is not a conservation issue. Local part-time residents and cabin owners will be negatively affected by this proposal.

Again, this proposal should not be approved. Thank you.

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>

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

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/AAQkADZINDE2M2RhlWWOTgtNDQ1OjS04YjQxLWE0YzY0NWl3MDNjZQAQAE3g...> 1/1



July 16, 2021

Federal Subsistence Board - Attn: Theo Matuskewitz  
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 then 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

6/30/2021

Mail - AK Subsistence, FW7 - Outlook

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

John Unzicker &lt;jmunzicker@gmail.com&gt;

Wed 6/30/2021 8:56 AM

To: AK Subsistence, FW7 &lt;subsistence@fws.gov&gt;

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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

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZiNDE2M2RhLWVOTgtNDQ1OjS04YjGxLWE0YzY0NW13MDNjZGAGAMTs...> 1/1

7/16/21

Wet - Air Subsurface, FWI - Outdoor

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

Luke Woodruff <alaskan\_waters@yahoo.com>

Wed 8/40/2021 5:23 PM

To: AK Substance, FW7 <substance@fwc.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](#)

[illegible]

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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>

**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*

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