

WP22-10 Executive Summary

<p>General Description</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>
<p>Proposed Regulation</p>	<p>Unit 4 - Deer</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>
<p>OSM Conclusion</p>	<p>Oppose Proposal WP22-10</p>
<p>Southeast Alaska Subsistence Regional Advisory Council Recommendation</p>	<p>Support WP22-10 with modification to area and harvest limit.</p> <p>The modified regulation should read:</p> <p>Unit 4 - Deer</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>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></p>
<p>Interagency Staff Committee Comments</p>	<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</p>

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Interagency Staff Committee Comments Cont.	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.
ADF&G Comments	Oppose Proposal WP22-10
Written Public Comments	63 Oppose, 1 Neutral
Notes	<p>This is a modified executive summary from the analysis for Proposals WP22-09/10, which was included in the Federal Subsistence Board April 2022 meeting book. Since the Board rejected Proposal WP22-09 as part of the consensus agenda at their April 2022 meeting, information on WP22-09 was removed from this executive summary and the following analysis. The following analysis has been updated and revised based on the Board's deferral of WP22-10 at their April 2022 meeting.</p> <p>The Southeast Council's recommendation on WP22-10 has been maintained at the end of this analysis for reference. ADF&G's full comments and all of the written public comments can be found in the April 2022 version of the analysis on the Office of Subsistence Management website at: https://www.doi.gov/subsistence/wildlife.</p>

**STAFF ANALYSIS
WP22-10**

ISSUES

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 WP22-10 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 Aug. 1 - Jan. 31
Sept. 15 – Jan. 31.*

Proposed Federal Regulation

Unit 4 - Deer

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

Unit 4 - Deer

Remainder

*Residents and Non-residents
- 6 deer total*

Bucks

HT Aug. 1 - Sept. 14

Any deer

HT Sept. 15 – Dec. 31

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 WP22-07 analysis.

Current Events

See WP22-07 analysis.

Biological Background

See 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. 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). Most recently, the heavy snowfall during the winter of 2021-22 led to concerns about possible heavy mortality. However, mortality

surveys in the spring of 2022 found that there was not higher than normal winter mortality, and that the body condition of live deer was similar to that in previous years (Bethune 2022).

Annual harvest is one indication of deer population status. The average annual reported deer harvest in Unit 4, 2000-2019, was 5,579 (**Figure 1**) (ADF&G 2021). Deer harvest was below average in 2007-2010 probably due to high deer mortality from several consecutive harsh winters. Unit 4 annual reported deer harvest has been increasing to pre-2007 levels, suggesting that the Unit 4 deer population has recovered from those harsh winters.

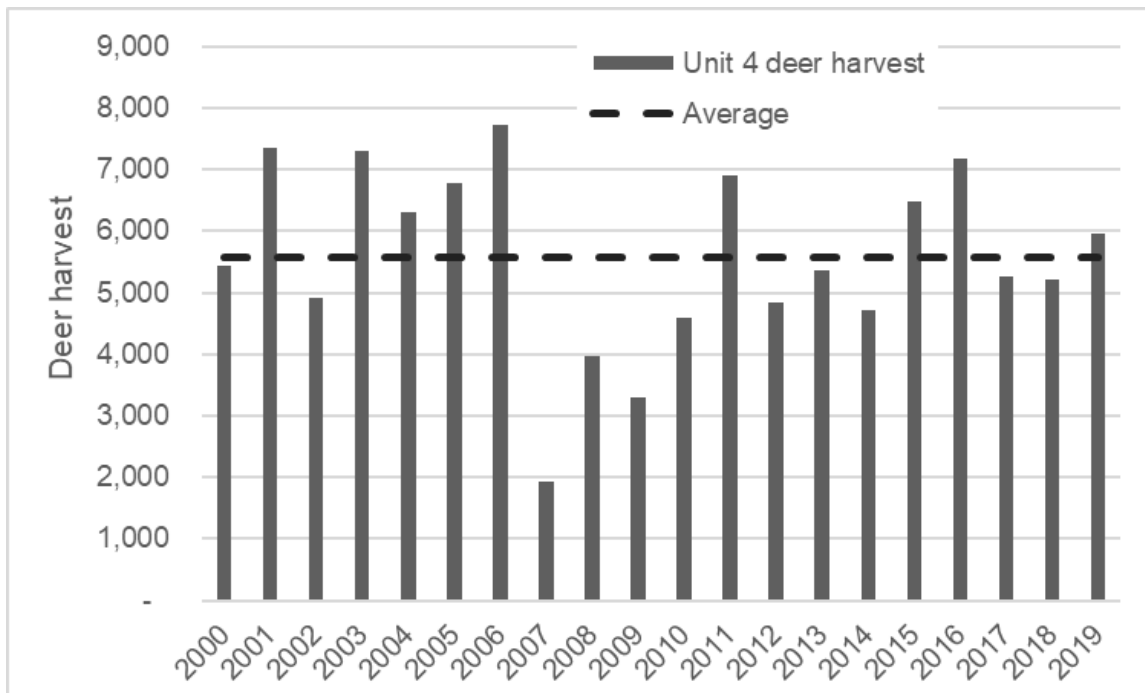


Figure 1. Unit 4 estimated annual reported deer harvest, 2000-2019. (ADF&G 2021)

Cultural Practices and Traditional Knowledge

Pelican, located on northwest Chichagof Island in Lisianski Inlet about 100 miles from Juneau, is a small fishing community founded around commercial fishing and fish buying or processing stations, economic activities that continue to be community mainstays (Schroeder and Kookesh 1990, ADLWD 2022). There is a seasonal population influx of commercial fishermen and other seasonal residents. The estimated population of year-round residents is estimated at 98 people (**Table 1**). The population peaked around 1990 and has since steeply declined. The downturn in the commercial fishing industry is likely responsible for the decline with people moving to other communities in search of cash income (ADLWD 2022). A Pelican resident explained that many people left the community when the local company Pelican Seafoods shutdown, and commercial fishing opportunities, such as longlining for halibut and black cod, have been decreasing (SEASRAC 2021a).

The Alaska State Ferry is scheduled to visit Pelican once a month October through December and March through April, however the ferry is occasionally canceled for various reasons. The Ferry will not visit Pelican from January through February (Juneau Empire 2022).

Residents of Pelican commented on deer in their area around Lisianski Inlet during several Southeast Alaska Council meetings in 2021 that are summarized below.

Many Pelican residents found harvesting deer in 2020 difficult and did not get enough deer to meet their needs. For example, Pelican residents said, “I have hunted off the lower part of the hills, and I haven't had any luck this year” (SEASRAC 2021a:19–20), and “I've been out in the hills hunting, and there is a definite lack of deer” (SEASRAC 2021b:504). Some Pelican residents have the ability to go out to the “outer coast” to seek deer and have been successful, while others must stay closer to Pelican because they lack the resources to travel further (SEASRAC 2021a, 2021b).

Some Pelican residents said they are observing more non-local deer hunters using Lisianski Inlet than in the past and have voiced concern about local depletion of wild resources. This is in part due to the geography of Lisianski Inlet limiting how many hunters can be successful because of very steep terrain around the inlet. There are only a few drainages that can be used to access hunting areas. A sort of crowding has been described leading to safety concerns by local Pelican deer hunters (SEASRAC 2021a, 2021b).

Pelican residents observed that every year varies when it comes to deer based on numerous environmental factors. Sometimes, after a heavy snowfall covers available browse, deer are observed on the beaches seeking food but disappear when it then rains as deer move back to forested areas and higher elevations to take advantage of the browse in those areas. Bears seeking deer can also scare deer off of the beaches (SEASRAC 2021a, 2021b). One Pelican resident said, “The recent winters have been less severe with less snow which can impact whether the deer are being driven to the beach fringe or not. [Fewer deer sightings] may have been because the snow level was well above the beach fringe” (SEASRAC 2021b:73). Some years, deep prolonged snow coverage results in deer die off (SEASRAC 2021a, 2021b).

Table 1. The population of Pelican from 1960 to 2020 based on the US Census (Source: ADLWD 2022).

Year:	1960	1970	1980	1990	2000	2010	2020
Population:	135	133	180	222	163	88	98

Food Security

Living in Pelican is expensive, for example a Pelican resident said, “We live on one fixed income, and we depend on our fish and our deer to eat. We have one ferry a month, if we're lucky. [For shipping], Alaska Sea Planes charges one dollar a pound. We can't afford to go and buy the expensive beef and expensive food” (SEASRAC 2021b:504), and “This is a low income community. Subsistence hunting

and fishing is really not optional for many folks here. Recent food scarcity has been exacerbated by the fact that our ferry service has been intermittent and our food supply has been undependable because of that” (SEASRAC 2021a:189–190). Pelican residents described the Alaska State ferry as unreliable and the stop at Pelican has been cancelled many times because of ferry worker strikes, the pandemic, broken down ferries, et cetera. This has caused concern about getting food to the community when the ferry does not come. It is common for planes to Pelican to be cancelled because of bad weather. One Pelican resident said, “You have to put up lots of food to sustain yourself” (SEASRAC 2021b:68–69).

Conflict between Hunter Success Rates Reported by ADF&G versus Local Observations

A local Pelican perspective is that the deer harvest reporting system is used primarily by successful hunters who don’t always include information about the number of trips they took. Harvest statistics of success rates are not the same as people’s observations. One Pelican resident said, “The analysis depicts the efficiency of local Federally-qualified hunters of Lisianski Inlet Straits as having a greater success rate. I question this information. When I complete a deer hunter survey I only list actual deer harvested [and not] the number of times I hunt without success, which may be three, four, or five times before I shoot a deer” (SEASRAC 2021b:73).

Harvest History

Through 2010, deer harvest data provided by the Alaska Department of Fish and Game (ADF&G) were 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.. 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. Additionally, if the response rate is low within a community, ADF&G staff call hunters to ask about their hunting efforts and harvests in an effort to achieve a 60% reporting rate (Bethune 2020, SEARAC 2021b).

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 deer in 2019 (**Figure 1**).

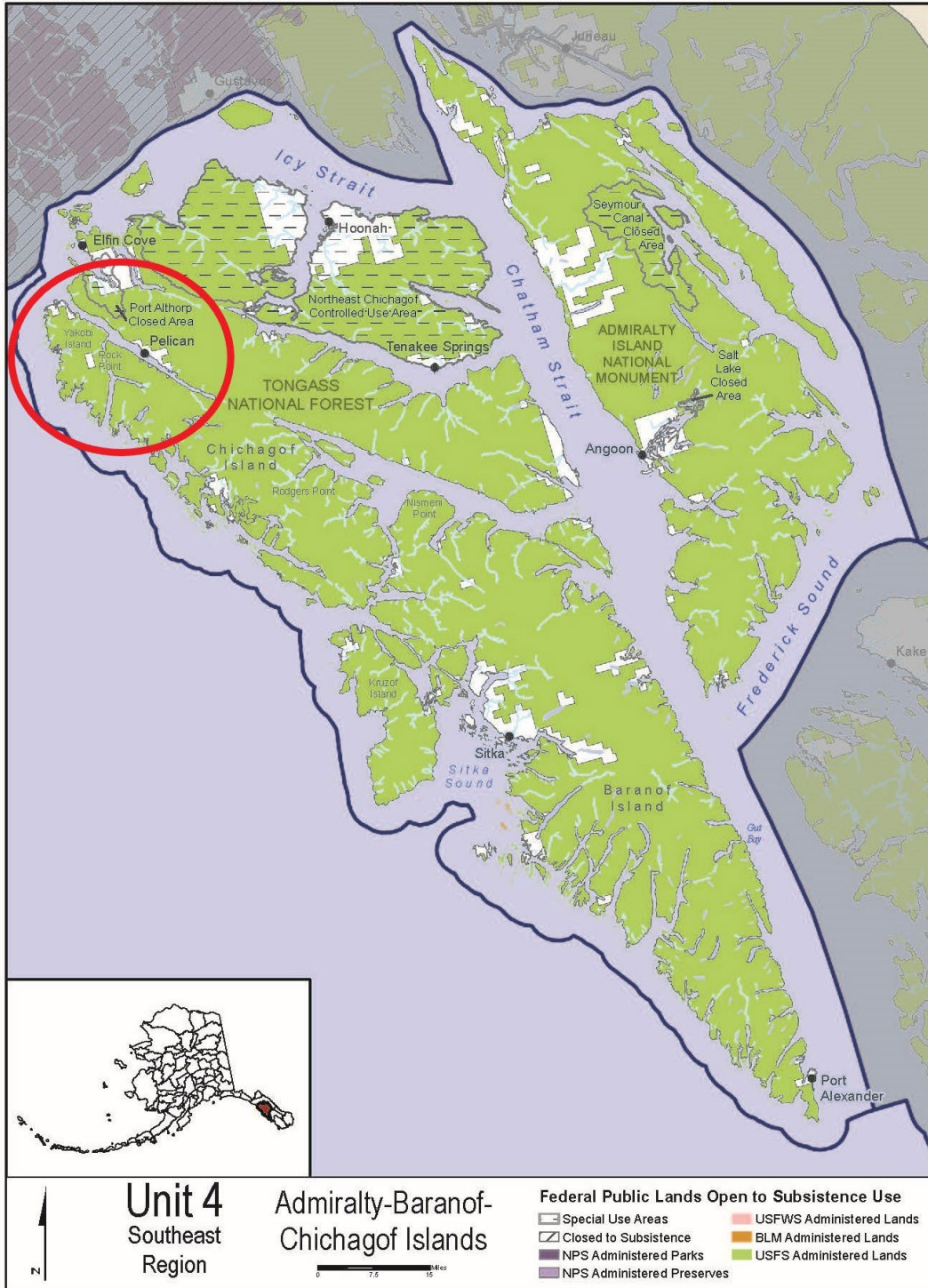
The proposal analysis area for WP22-10 relative to Unit 4 is shown in **Map 1**. The harvest data presented is specific to wildlife analysis areas (WAAs) encompassing, the area of Lisianski Inlet, Lisianski Strait, and Stag Bay (**Map 2**).

The vast majority of deer hunting effort and harvest by Pelican residents occurs within the proposal area. More than three quarters of effort and harvest by Pelican residents occurs in the Upper Lisianski Inlet (3419) and Yakobi Island (3418) WAAs. Based on the distribution of harvest and effort, proximity to Pelican appears to be the primary factor in selecting hunting locations, with very little effort and harvest occurring outside of the Pelican area (**Table 2**).

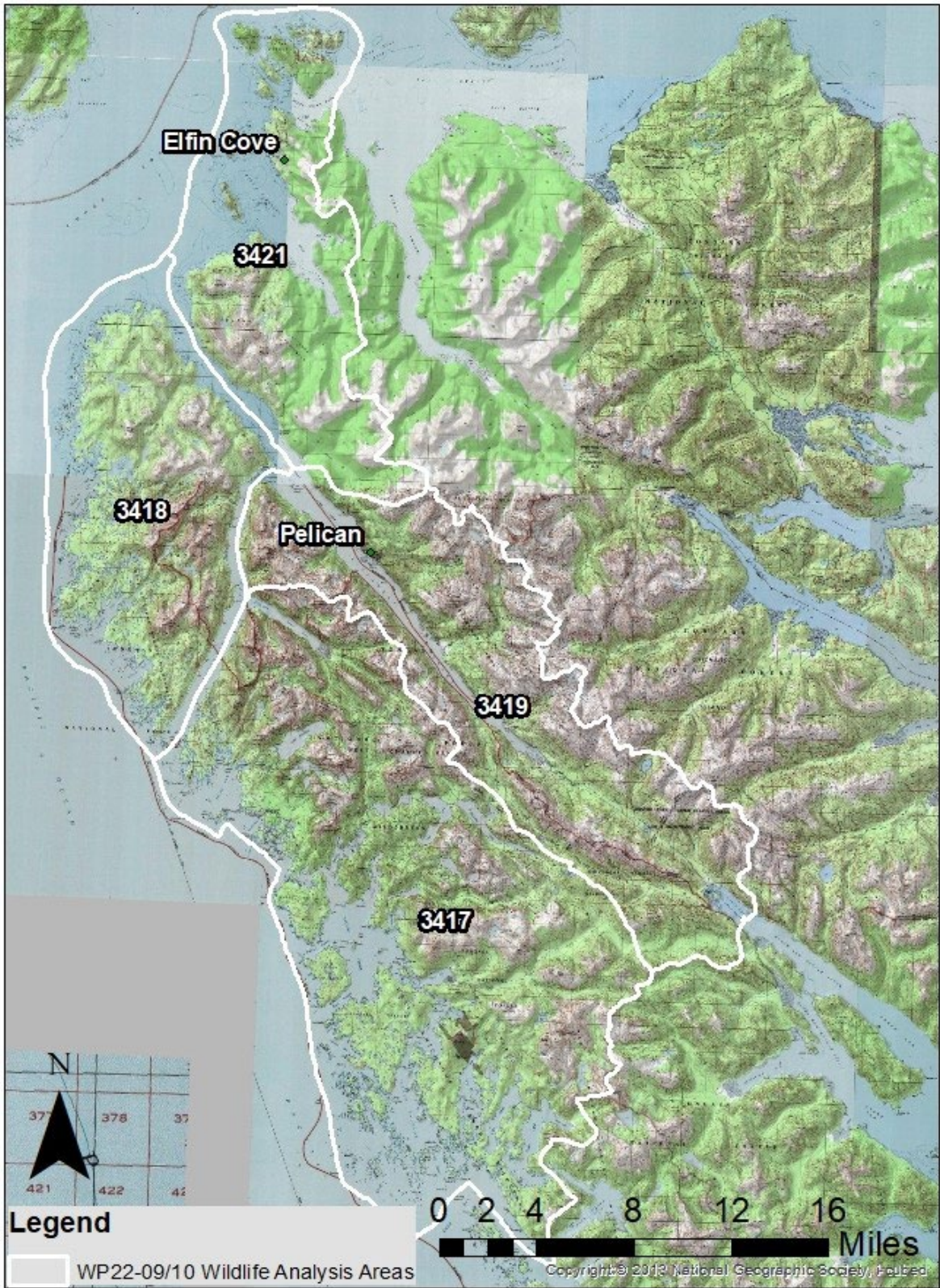
Harvest and effort by Federally qualified subsistence users and non-Federally qualified users in the relevant WAAs is presented in **Figures 2** and **3** below. Federally qualified harvest is consistently higher compared to other users (**Figure 2**) while effort, expressed in hunter days, is generally lower (**Figure 3**). The success rate (i.e. harvesting at least one deer per hunt) of Pelican residents has averaged between 80% and 100% since 2008, with an average of 1.8 deer harvested per hunter (**Figure 4**). However, unsuccessful hunts are probably less likely to be included in harvest reports, so the actual success rate may be lower. Non-Federally qualified users have a lower success rate, which results in higher hunting effort compared to Federally qualified subsistence users within the proposal area. 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 5**), although up until 2019, the State harvest limit was four deer in Unit 4. Most deer harvested by non-Federally qualified hunter are males, with an average of 15% females harvested between 2000 and 2021 (**Figure 7**).

According to ADF&G's comments on Proposals WP22-09/10 (included in the April 2022 Board meeting book and available at www.doi.gov/subsistence/wildlife), Federally qualified subsistence users within the proposal area are very efficient at harvesting deer, requiring only 1.9 days to harvest one deer on average between 1997 and 2020, compared to 2.7 days for non-Federally qualified users within the proposal area, and 3.0-7.9 days for deer hunters in other units across Alaska.

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 6**).



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.

Table 2. Distribution of deer hunting effort and harvest by Pelican residents, 2000-2021. (ADF&G 2022)

Wildlife Analysis Area

Within proposal area	Total harvest	Days hunted	Percent harvest	Percent days hunted
3417 WEST COAST CHICHAGOF	163.6	284.2	16%	19%
3418 YAKOBI IS.	387.6	439.7	38%	29%
3419 UPPER LISIANSKI INLET, LISIANSKI RIVER	370.7	659.8	36%	44%
3421 PORT ALTHORP, LOWER LISIANSKI, INIAN IS.	60.3	76.8	6%	5%
Total within proposal area	982.2	1460.5	95%	98%

Outside proposal area	Total harvest	Days hunted	Percent harvest	Percent days hunted
3002 SITKA ROAD SYSTEM	1.5	1.5	0%	0%
3003 SILVER BAY, DEEP INLET	4.5	4.5	0%	0%
3312 DUFFIELD PENIN., BEAR BAY	3.7	1.8	0%	0%
3314 FISH BAY DRAINAGES	2.9	1.5	0%	0%
3416 KHAZ PENIN., SLOCUM ARM	7.4	4.5	1%	0%
3526 NORTH SHORE TENAKEE INLET	1.8	1.8	0%	0%
3629 SOUTHERN SHORE TENAKEE INLET	4.7	7.9	0%	1%
3731 KELP BAY-TAKATZ BAY	1.6	1.6	0%	0%
3733 WHALE BAY DRAINAGES, WILDERNESS COAST	9.8	0	1%	0%
3835 NORTHERN MANSFIELD PENIN.	3.4	3.4	0%	0%
4041 WHITEWATER BAY, WILSON COVE	1.7	1.7	0%	0%
4252 HUMPBACK, GALLAGHER CREEKS	5.7	5.7	1%	0%
Total outside proposal area	48.7	35.9	5%	2%

Total Unit 4	1030.9	1496.4		
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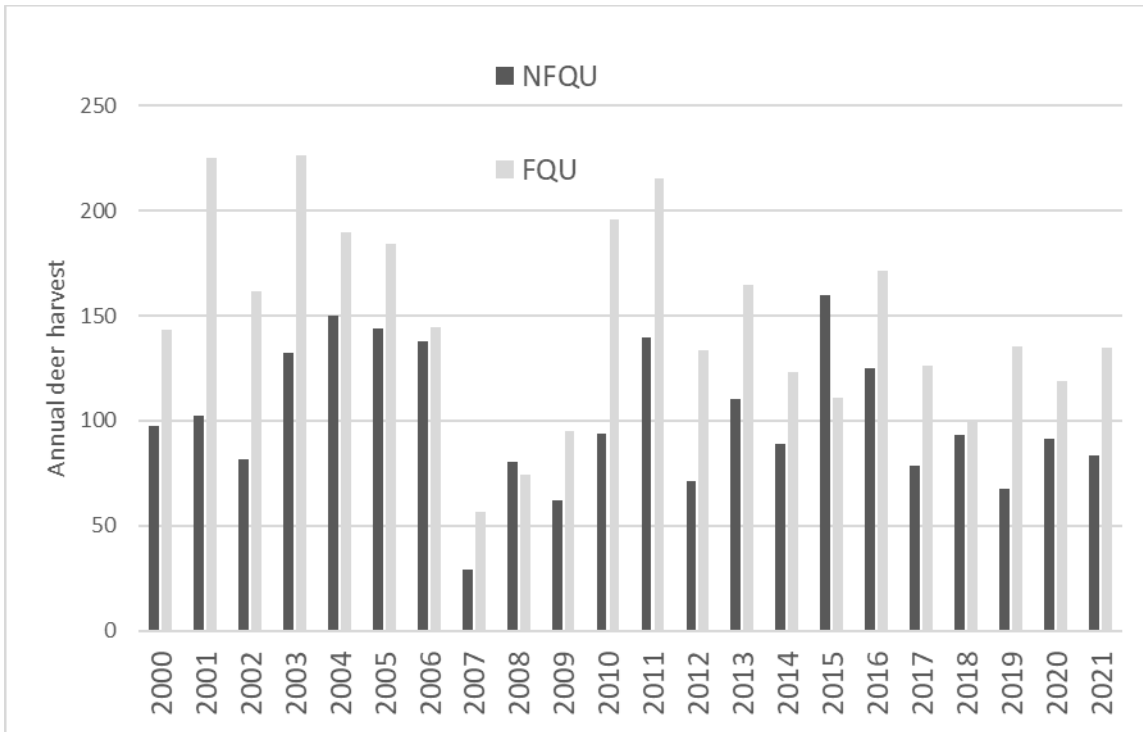


Figure 2 . Annual deer harvest by Federally qualified (FQU) and non-Federally qualified (NFQU) users in the proposal analysis area, 2000-2021 (ADF&G 2022).

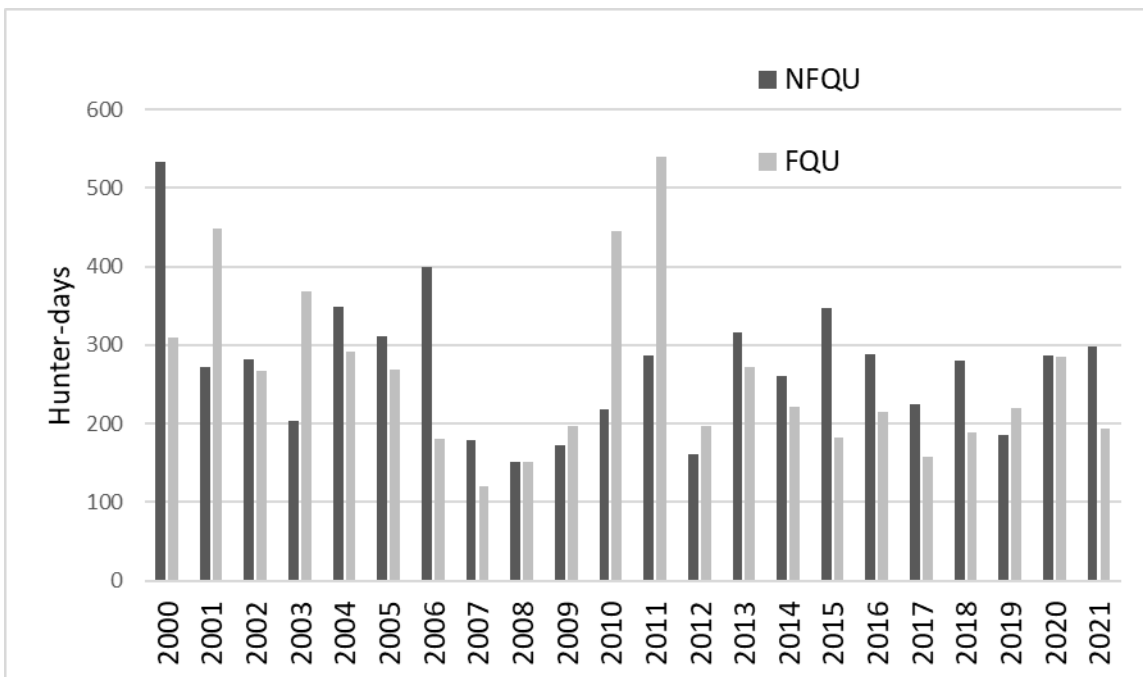


Figure 3 . Annual hunter days by Federally qualified (FQU) and non-Federally qualified (NFQU) users in the proposal analysis area, 2000-2021 (ADF&G 2022).

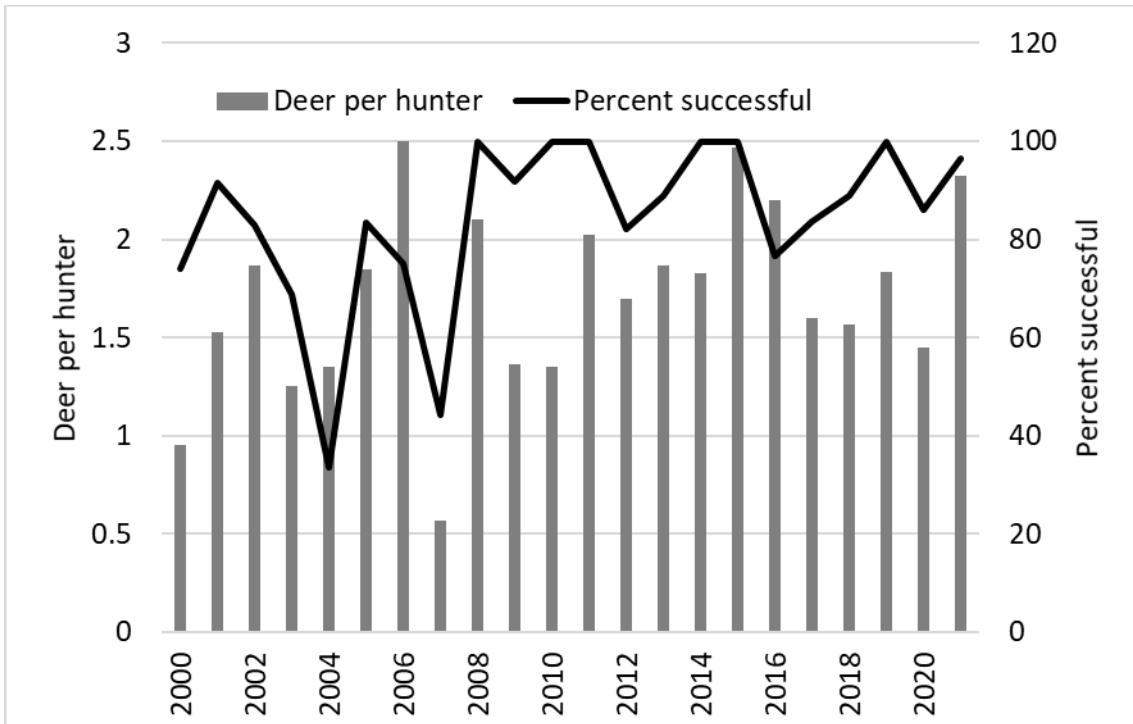


Figure 4. Hunter success rate and deer harvested per hunter for Pelican residents hunting in Unit 4, 2000-2021 (ADF&G 2022).

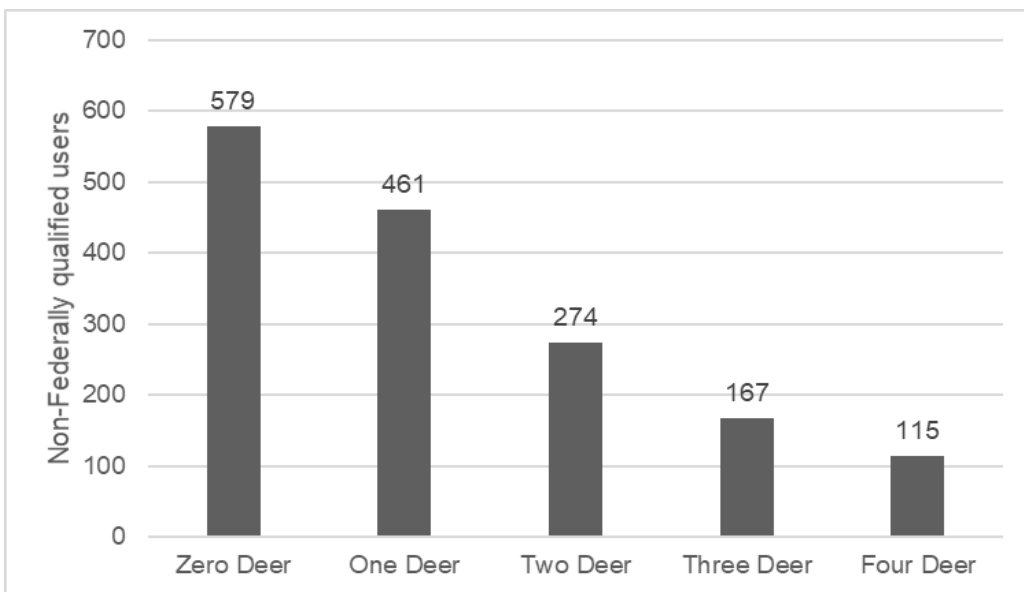


Figure 5. Average number of non-Federally qualified users harvesting 0-4 deer annually in Unit 4, 2000-2019 (ADF&G 2021).

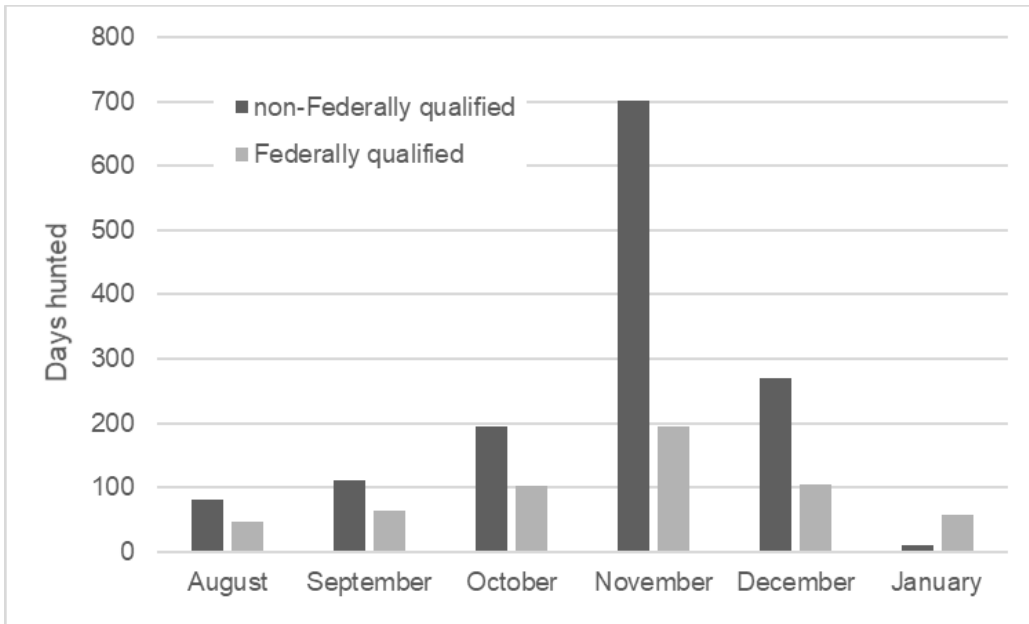


Figure 6. Average number of days hunted by month by Federally qualified subsistence users and non-Federally qualified users in Unit 4, 2000-2019 (ADF&G 2021).

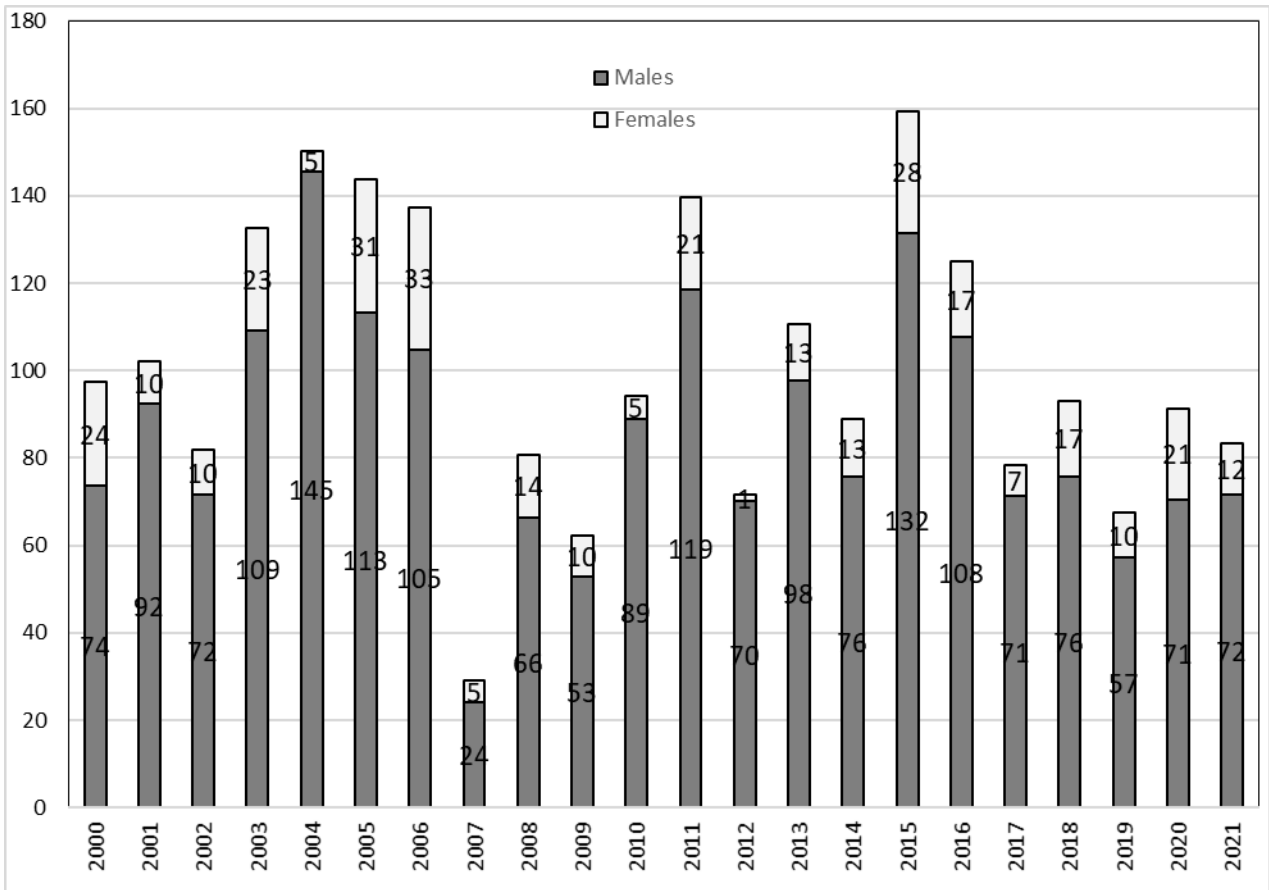


Figure 7. Number of male and female deer harvested by non-Federally qualified hunters in the proposal area, 2000-2021. (ADF&G 2022)

Other Alternatives Considered

Modified harvest limit reduction: The Southeast Council recommended restricting the harvest limit for non-Federally qualified users within the proposal area to three bucks, while the Pelican Fish and Game Advisory Committee recommended restricting it to two bucks. One Council member commented, “if there is truly a conservation concern . . . I think putting the harvest of does in the hands of local [people], like giving them that option is a viable tool to help potentially increase and protect deer numbers out there.” (SEARAC 2021b).

Limiting harvest to males only is usually a harvest management strategy to allow harvest, while supporting growth of wildlife populations. OSM did not further consider this alternative because the Unit 4 deer population is abundant, healthy, and may be reaching winter carrying capacity in some areas, suggesting harvest of does may actually benefit the deer population and therefore, subsistence users’ harvest opportunity in the long-term. Additionally, competition with non-Federally qualified users may slightly increase under this alternative since hunters would have to pass on does, potentially increasing their hunting time.

Of note, the Council member from Pelican voted against this recommendation, commenting that he was curious “how limiting it to three is going to actually do anything.” Earlier in the meeting he stated “a bag limit reduction is a preferred way if there’s a resource problem, but if you’re looking at a competition or hunting pressure [problem], it’s not really.”

Working Group: One alternative considered was to establish a Unit 4 deer working group. This suggestion was mentioned many times by Southeast Council members and public testers during the fall 2021 Southeast Council meeting. Developing a “Unit 4 deer management strategy,” which was also suggested multiple times during the fall 2021 Southeast Council meeting, could be one goal of the working group. Several Council members recognized that subsistence uses of deer in Unit 4 was an issue that they wanted to elevate to the Board’s attention, but commented that these specific regulatory proposals (WP22-07, -08, and -10) did not seem to be the best solution.

This alternative would allow consideration of this issue more holistically and on a longer time-scale than the regulatory proposals. It would also enable all alternatives to be considered and could help bring user groups together for discussion, which the Board requested in its deferral. While this alternative is outside the scope of this proposal, it could be considered further by the Southeast Council. If the Council would like to establish a working group, it could do so at its meeting by selecting Council members to serve on the working group. Federal and State agency staff could also be part of the working group, while members of the public and other organizations could participate in working group meetings if they are announced through press releases.

Effects of the Proposal

This proposal would restrict non-Federally qualified users' harvest limit to four deer in Lisianski Inlet and Lisianski Strait. This restriction could slightly decrease overall deer harvest and competition with Federally qualified subsistence users in the area. Lower harvest and reduced competition may lead to slightly more favorable hunting conditions for Federally qualified subsistence users. However, as very few non-Federally qualified users harvest four deer, this restriction would likely have little effect on non-Federally qualified user hunting effort and harvest or Federally qualified subsistence users' hunting success or experience (**Figure 5**).

Until 2019, the State harvest limit was four deer in Unit 4. ADF&G's comments on Proposals WP22-09/10 (included in the April 2022 Board meeting book and available at www.doi.gov/subsistence/wildlife) stated only 3% of non-Federally qualified hunters reported harvesting five or six deer in Unit 4 in 2019 and 2020. An average of 62 non-Federally qualified users reported hunting in the four WAAs within the proposal area (**Map 2**) in 2019 and 2020 according to ADF&G's comments, suggesting this proposal would only affect two non-Federally qualified hunters. Additionally, those two non-Federally qualified hunters could still hunt within the proposal area, but their hunting time may be somewhat reduced. They also could still hunt on the state-owned tidelands below mean high tide within the proposal area. Based on this information, a harvest limit restriction of four deer would not provide any meaningful subsistence priority or benefit to Federally qualified subsistence users, and would be an unnecessary restriction on non-subsistence uses.

Southeast Council members expressed concern over the displacement of non-Federally qualified users to other areas if this proposal was adopted, which one member called "squeezing the balloon". They were especially concerned about this displacement if all three proposals (WP22-07, -08, and -10) were adopted, stating hunting pressure will just shift and become concentrated in other areas, creating similar problems there instead (SEARAC 2021b). This may be the largest cumulative impact if the Board adopted all three Unit 4 deer proposals. Another concern brought up at the Southeast Council meeting over all three proposals was enforcement. A public testifier stated that he has never seen any Federal officers out during hunting season, and wondered about the effectiveness of these restrictions/closures if no one was enforcing them (SEARAC 2021b). Determining whether or not non-Federally qualified users and deer are below the unmarked mean high tide line on state-owned lands is another enforcement concern.

During the fall 2021 Southeast Council meeting, Council members also discussed the impact of proxy hunting on the effectiveness of harvest limit reductions. A Council member stated, "So anybody going into this area who wanted to shoot a bunch of deer just has to go through the relatively minor step of getting a proxy permit for one or two people and they could harvest quite a few deer. So that limits the effectiveness of harvest limit [reductions] on cutting down deer hunting." (SEARAC 2021b).

Another effect of this proposal may be straining relationships between Pelican residents and between user groups. Several public commenters discussed how both proposals WP22-09 (which concerned a closure to non-Federally qualified users around Pelican) and WP22-10 were really dividing the Pelican

community, pitting people against each other. One stated, “The conflict between user groups that these proposals are creating is enormous.” Council members shared these sentiments, “I have a really hard time dealing with these really divisive situations that’s breaking these communities apart.” The Council Chair commented, “a bag limit reduction, in my view, is probably not the most effective. . . but I do hear enough concerns from Pelican residents that there is a problem that needs to be addressed” (SEARAC 2021b).

Local knowledge attests that only one or two boats in an area can negatively affect the success of subsistence hunts because access in some inlets is very small. Therefore, even though ADF&G harvest reports indicate no increase in non-Federally qualified subsistence users hunting in these areas, just a couple can seriously impact subsistence hunts (SEARAC 2021b). As one Council member put it, “There’s plenty of water but there’s not enough elbow room at the bar.” Specifically in Lisianski Inlet, steep mountains limit access, and intermittent watersheds provide the best access to hunting areas. The Council member from Pelican explained that it takes only “a few boats to clog up . . .the watersheds with hunters, especially if there’s two or three boats with several hunters each dropping guys off at these different beaches,” and “this effect can last multiple days” (SEARAC 2021b).

Comments received during the Fall 2021 Southeast Council meetings were mixed on whether the concerns over subsistence uses of deer in Unit 4 were an issue of conservation concern stemming from localized depletion of deer, which ADF&G unit-wide data was too coarse to detect or an issue of continuation of subsistence uses stemming from competition and crowding from non-local hunters who may displace local, subsistence hunters from preferred and traditional hunting areas. A Pelican resident commented that Pelican hunters “are seeing less deer in the Lisianski Inlet and Lisianski Strait area” and recommended, “to err on the side of conservation, a reduced bag limit is reasonable.” Other public commenters expressed concern that the local deer population is in danger and that there is a noticeable lack of deer. However, during discussion of WP22-09, the Council member from Pelican stated, “this proposal wasn’t really because of a conservation issue. It was because of a hunting pressure or competition issue.” Several public testifiers also commented on increased hunting pressure and competition around the Pelican area, while others viewed it as a combination, “there seems to be a lot more traffic running around here and fewer deer.” (SEARAC 2021b).

Additionally, feedback received during the open meeting in August 2022, including from several Pelican residents, indicated people did not experience any difficult harvesting deer in Unit 4, which is corroborated by ADF&G survey data indicating Unit 4 has the highest deer population in Alaska. Also during the open meeting, people commented that any perceived deer population decline likely resulted from mild winters, which precluded deer from being concentrated and easily observable on beaches.

Finally, State Proposals 10 and 11 request reducing the harvest limit under State regulations to four deer in Unit 4, remainder. The BOG is scheduled to consider these proposals in January 2023, the week before the Board will consider deferred Proposal WP22-10. If the BOG adopts Proposals 10 and 11, then the effect of Proposal WP22-10 would be obsolete.

OSM CONCLUSION

Oppose Proposal WP22-10.

Justification

§815(3) of ANILCA provides that the Board may restrict non-subsistence uses on Federal public lands only if *necessary* “for the conservation of healthy populations of fish and wildlife” or “to continue subsistence uses of such populations.” The harvest limit restriction on Federal public lands within the proposal area does not meet these criteria. The closure is not necessary for the conservation of healthy deer populations. The Unit 4 deer population is healthy, abundant, and may be approaching carrying capacity in some locations.

The restriction is also not necessary for the continuation of subsistence uses based on the available evidence. Pelican deer hunters experience very high success rates and efficiency, and very few non-Federally qualified users harvest four or more deer annually in Unit 4, so restricting them to four deer would not significantly affect harvest or effort by non-Federally qualified users or the hunting experience of Federally qualified subsistence users.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Southeast Alaska Subsistence Regional Advisory Council

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 area and harvest limit.

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.