



SOUTHCENTRAL ALASKA
SUBSISTENCE REGIONAL
ADVISORY COUNCIL

*October 21-22, 2015
Copper Center, Alaska*



What's Inside

Page

1	Agenda
4	Roster
5	Winter 2015 Draft Meeting Minutes
12	Rural Determination Update
17	Alaska National Wildlife Refuge System Proposed Rule on Hunting
23	Wildlife Proposal WP16-10a & 10b
38	Wildlife Proposal WP16-11
48	Wildlife Proposal WP16-12
58	Wildlife Proposal WP16-13
66	Wildlife Proposal WP16-14
73	Wildlife Proposal WP16-15
86	Wildlife Proposal WP16-16
106	Wildlife Proposal WP16-17
118	Wildlife Proposal WP16-18
135	Wildlife Proposal WP16-19
150	Wildlife Proposal WP16-20
167	Wildlife Proposal WP16-60
183	Wildlife Proposal WP16-67

Continued on next page...

On the cover...

A bundle of fresh blueberries represents a classic Alaskan autumn harvest.



Karen Deatherage

What's Inside

- 194 Wildlife Proposal WP16-68
- 202 Delegation of Authority Letter from Federal Subsistence Board to Cordova District Ranger
- 205 2016 Fisheries Resource Monitoring Program - Briefing and Southcentral Overview
- 241 Annual Report Briefing
- 243 Federal Subsistence Board Annual Report Reply
- 253 Cook Inlet Area Federal Subsistence Fisheries Summary
- 254 Wrangell-St. Elias National Park & Preserve News Release - Chisana Caribou Herd Hunt
- 255 Wrangell-St. Elias National Park & Preserve Backcountry and Wilderness Stewardship Plan, Summer, 2015
- 257 Office of Subsistence Management - Fall 2015 Report
- 260 2016 All-Council Meeting Information
- 265 2016 Council Meeting Calendars
- 267 Council Charter

SOUTHCENTRAL ALASKA SUBSISTENCE REGIONAL ADVISORY COUNCIL

Ahtna Heritage Center
Copper Center, Alaska
October 21-22, 2015
8:30 am – 5:00 pm

TELECONFERENCE: call the toll free number: 1-866-916-7020, then when prompted enter the passcode: 37311548

PUBLIC COMMENTS: Public comments are welcome for each agenda item and for regional concerns not included on the agenda. The Council appreciates hearing your concerns and knowledge. Please fill out a comment form to be recognized by the Council chair. Time limits may be set to provide opportunity for all to testify and keep the meeting on schedule.

PLEASE NOTE: These are estimated times and the agenda is subject to change. Contact staff for the current schedule. Evening sessions are at the call of the chair.

AGENDA

*Asterisk identifies action item.

1. Roll Call and Establish Quorum (*Secretary*).....4

2. Invocation

3. Call to Order (*Chair*)

4. Welcome and Introductions (*Chair*)

5. Review and Adopt Agenda* (*Chair*)1

6. Review and Approve Previous Meeting Minutes* (*Chair*)5

7. Length of Service Awards

8. Reports

 Council Member Reports

 Chair’s Report

9. Public and Tribal Comment on Non-Agenda Items (available each morning)

10. Old Business (*Chair*)

 a. Rural Determination Update (*OSM*)..... 12

 b. Refuges Proposed Rule on Hunting* (*USFWS*) 17

11. New Business (Chair)

a. Wildlife Proposals* (*OSM Wildlife/Anthropology*)

Regional Proposals

1. WP16-10a & 10b: Unit 6D Moose. Create Federal season; revise C&T Use Determination...	23
2. WP16-11: Unit 6 Deer. Harvest limits and new season.....	38
3. WP16-12: Unit 6 Deer. Change harvest limit.	48
4. WP16-13: Unit 6D Black Bear. Change in season date.....	58
5. WP16-14: Unit 6D Goat. Change in season date.....	66
6. WP16-15: Unit 7 Caribou. Harvest quota change.....	73
7. WP16-16: Unit 13 All Species. Close Paxson open area.....	86
8. WP16-17: Unit 13 Caribou. Remove restrictions in Unit 13 to hunt within the pipeline ROW.	106
9. WP16-18: Unit 11 & 12 Brown Bear. Change in season date and methods and means.....	118
10. WP16-19: Moose and Caribou. Revise Ahtna permit for culture camp.	135
11. WP16-20: Unit 11 Sheep. Change in harvest limit.....	150
<i>Crossover Proposals</i>	
12. WP16-60: Unit 12 Caribou. Rescind closure.....	167
13. WP16-67: Unit 12, 20E Beaver. Change in method and means.	183
14. WP16-68: Unit 12, 20E Lynx. Change in trapping season dates.....	194
b. Cordova District Ranger – Delegation of Authority.....	202
c. 2016 Fisheries Resource Monitoring Program* (<i>OSM Fisheries/Anthropology</i>).....	205
d. Identify Issues for FY2015 Annual Report* (<i>Council Coordinator</i>).....	241

12. Agency Reports

(Time limit of 15 minutes unless approved in advance)

Tribal Governments

1. Ninilchik Traditional Council
2. Native Village of Eyak – 2015 Copper River Chinook Salmon (*Matt Piche*)

Native Organizations

1. Ahtna Moose Browse Project (*Bruce Cain/William Wall*)

USFWS

1. Kenai Field Office Update on Kenai/Kasilof Subsistence fishery (*J eff Anderson*).....253

2. Kenai NWR (*Todd Eskelin*)

USFS

1. Chugach National Forest Plan (*Milo Burcham*)

NPS

1. Wrangell-St. Elias National Park (*Barbara Cellarius*)

- 2015 Federal Subsistence Hunt of Chisana Caribou Herd.....254
- Backcountry & Wilderness Stewardship Plan, Summer 2015.....255

2. Subsistence Resource Commission membership (*Barbara Cellarius*)

BLM

1. Glennallen Field Office

OSM

1. Fall 2015 Report.257

13. Future Meeting Dates*

Winter 2016 All-Council Meeting Update (*Meeting Committee*)..... 260

Select Fall 2016 meeting date and location 265

14. Closing Comments

15. Adjourn (*Chair*)

To teleconference into the meeting, call the toll free number: 1-866-916-7020, then when prompted enter the passcode: 37311548

Reasonable Accommodations

The Federal Subsistence Board is committed to providing access to this meeting for all participants. Please direct all requests for sign language interpreting services, closed captioning, or other accommodation needs to Donald Mike, 907-786-3629, donald_mike@fws.gov, or 800-877-8339 (TTY), by close of business on October 12, 2015.

REGION 2
Southcentral Alaska Subsistence Regional Advisory Council

Seat	Year Apptd Term Expires	Member Name and Community
1	2007 2016	Robert Henrichs Cordova
2	2014 2016	Eleanor Dementi Cantwell
3	2003 2016	Greg Encelewski Ninilchik Vice Chair
4	2010 2016	Mary Ann Mills Kenai
5	2014 2016	Lee R. Adler Glennallen
6	2003 2017	Gloria Stickwan Tazlina
7	2011 2017	James Showalter Sterling
8	2011 2017	Michael V. Opheim Seldovia
9	2011 2017	Andrew T. McLaughlin Chenega Bay
10	2009 2015	Judith C. Caminer Anchorage Secretary
11	1993 2015	Ralph Lohse Copper River Chair
12	2003 2015	Tom Carpenter Cordova
13	2013 2015	Herman N. Moonin, Jr. Ninilchik

SOUTHCENTRAL ALASKA SUBSISTENCE REGIONAL ADVISORY COUNCIL

Dimond Center Hotel
700 East Dimond Blvd Anchorage, Alaska
February 18-19, 2015
Meeting Minutes

Call to Order/Roll Call/Invocation

Meeting called to order by Chair Lohse. RAC members present; Robert Henrichs, Greg Encelewski, Mary Ann Mills, James Showalter, Michael Opheim, Andrew McLaughlin, Judy Caminer, Ralph Lohse, Tom Carpenter. Absent: Eleanor Dementi, Gloria Stickwan, and Lee Adler. Unexcused absence: Herman Moonin, Jr.

Quorum established.

Ms. Mary Ann Mills led the invocation.

Welcome and Introduction

Chair Lohse welcomed staff and public.

Government Agency Employees

Donald Mike	OSM
Tom Evans	OSM
Robbin La Vine	OSM
Orville Lind	OSM
Chuck Ardizzone	OSM
Pippa Kenner	OSM
Jeffrey Bryden	USFS
Robert Stovall	USFS
Mary Rasmussen	USFS
Heather Tonneson	USFWS Anchorage
Derek Hildreth	OSM
Robert Skorkowsky	USFS Cordova
Trevor Fox	USFWS Anchorage
Barbara Cellarius	NPS Wrangell-St. Elias
Sara Bullock	BLM Glennallen
Dennis Teitzel	BLM Glennallen
Jennifer Yuhas	ADFG

NGOs/Public

Mark King	Native Village of Eyak
Ivan Encelewski	Ninilchik Traditional Council
Matt Piche	Native Village of Eyak
John Schandelmeier	Paxson Fish & Game AC
Mike Fleagle	Sen. Sullivan's Office

Mary Patania

Public

Review and Adopt Agenda

Ms. Mills moved to adopt the agenda with amendments. Second was called by Mr. Encelewski. A briefing on recent requests for reconsideration was added under agenda item 11F. Recent special actions were added under agenda item 10F and for item G, Partners Program from the Native Village of Eyak. Under the non-agenda items, add a presentation from Mr. Sky Starkey for a briefing to the Council on the Governor's Transition Team. Add Ninilchik Tribal Council under the public and tribal comments agenda item. Agenda adopted as amended.

Election of Officers

Chair – Ralph Lohse

Vice Chair – Greg Encelewski

Secretary – Judy Caminer

Review and Approve Previous Meeting Minutes

Mr. Carpenter move to adopt the meeting minutes and second called by Mr. Encelewski. Discussion: Mr. McLaughlin stated under his report for bear and deer population, strike "was" and "by" because the bear population, like a predator/prey relationship, followed its prey the deer population in decline. Add discussion and action in the minutes on the delegation of authority, where the Council discussed a sunset clause. Minutes adopted with amendments.

Public and Tribal Comments on Non-agenda Items

Mr. Ricky Gease testified on outreach efforts needed to get to the sport user groups regarding the Kenai fishery.

Mr. Mark King, Native Village Eyak. Mr. King commented on the subsistence fishery in Prince William Sound and the Copper River area.

Mr. John Sandelmeir, Chair, Paxson Fish and Game AC commented on his community's concern on the Paxson closed hunting area. Area is open for Federal hunting, State lands are closed. The area has been a closed area but, Federal season is allowed and causes public confusion.

Old Business

Rural Determination Process Review

The council supported the proposed rule with modification.

§ __.15 Rural determination process.

(a) The Board determines which areas or communities in Alaska are nonrural. Deference will be given to the Regional Advisory Councils. Current determinations are listed at § __.23.

(b) All other communities and areas are, therefore, rural.

The council had questions on how the determinations would be done as the rule is very vague. They appreciated that the rule allowed for regional variation. The council was also concerned about the when, or how often a proposal could be submitted to change nonrural status.

Customary & Traditional Use Determination

Southeast RAC C&T use determination Ms. Robbin La Vine briefed to the Council on the SERAC proposal. The Southcentral RAC would like to see more of a process for each species for the region.

Refuges Proposed Rule on Hunting

NWS Proposed Rule – Andy Loranger and Heather Tonneson presented the proposed rule.

National Park Service – Subsistence Collection

Ms. Barbara Cellarius provided an update on the NPS Subsistence collection and uses of shed or discarded animal parts.

Review of FRMP Strategic Plan

FRMP Strategic Plan for the Kenai Pen and Cook Inlet region. Plan is to review the whole program. Funding is in the works.

New Business

Wildlife Closure Review

Policy Review Briefing presented by Mr. Tom Evans

WCR14-34 Unit 11 Caribou

The council supported the status quo keeping the caribou season closed in Unit 11, based on conservation concerns.

Call for Regulatory Proposals

The Council moved to submit a special action to remove the pipeline hunting restrictions in Unit 13 Remainder for the upcoming hunting season and also will submit as a wildlife proposal.

This regulation should be changed; it is an undue burden on Federally Qualified subsistence users. The closure is not related to any conservation concerns for caribou in the area. Additionally, this restriction is not found in any other area and is not required

under State hunting regulations in the same area and causes unintended violation for subsistence users.

Funding Notification – FRMP

Funding Notification briefing presented by Ms. Robbin La Vine

Review and Approve FY2014 Annual Report

Mr. Encelewski moved to adopt the 2014 Annual Report and second called by Ms. Mills.

1. Intent of ANILCA

The Council would like to make the Board aware that AFN passed a resolution in 2012 supporting a rural preference and reaffirmed their previous position for a Native preference in addition to a rural preference for subsistence uses. The Council would like to see the intent of ANILCA reviewed when food security issues are being affected.

Recommendation: The FSB is encouraged to review the history and the guidelines and current policies and treaties as it relates to Alaska Tribes, food security, and rural residents. The Board is also encouraged to review the legislative history and reference Udall's testimony on the ANILCA bill. The Board review on these issues could allow them, when applicable, to consider the reference materials during deliberations.

2. Regional Issues/Resources

Resource demands have increased in Alaska among various user groups. The Council addressed and discussed the shortage of certain subsistence resources. Current regulatory means addresses some of the shortages through subsistence priority on Federal Public Lands. As demands increase for subsistence resources, distribution conflicts also have increased to meet all these user demands for the same resource.

3. Allocation of Fisheries Resource Monitoring Funds

The Fisheries Resource Monitoring Program is important to the Council; it has provided valuable data for the Council to use when developing its recommendations on Federal subsistence fishery proposals. When the original allocations were developed for each Region, the Federal Subsistence Management Program did not have responsibility for the Cook Inlet waters and subsistence fisheries. We request a reallocation of funds to the Southcentral area to include that additional area and associated costs. We have been told this is in process but we do not know when this may occur and we encourage that it happen soon. We support full funding, which includes funding for the Cook Inlet area, for the Southcentral region to continue the important work the Partners Program has provided.

4. NPFMC Subsistence Seat

The Magnuson - Stevens Act is being debated in Congress for reauthorization. The Council has discussed the importance of a seat on the NPFMC to represent subsistence users on its panel. The Department of Commerce, through the NPFMC, has authority to manage the fisheries in the Bering Sea. The Bering Sea fishery has by-catch of Alaska-

bound salmon during the commercial Pollock fisheries affecting all subsistence salmon fisheries in the State's anadromous waters.

We would like the FSB, in representing subsistence interest on ANILCA lands, to encourage the Secretary of Commerce to establish a subsistence seat on the NPFMC. The seat will provide a voice and represent federal subsistence user groups from Alaska. The Board can stress that the subsistence representative be a rural resident and also a qualified Federal Subsistence user. Can the FSB begin a dialogue with the Secretary of Commerce and the Governor to consider a dedicated subsistence seat as identified and recommended by the FSB.

5. Special Actions

The special action is a tool to address out of cycle requests and changes in Federal subsistence regulations and used by in-season managers in consultation with the affected RAC chairs and members.

The Council requests these Special Actions be distributed in a timely manner. The immediate distribution is essential to keep the Chairs, and affected RAC members involved and informed of closures and extension of existing seasons.

6. Partners Program

The Partners Program should be expanded to be more of an interdisciplinary approach and fully engage young people.

The program funds fishery biologists, anthropologists and student interns. Engaging our youth will provide an opportunity for them to establish an educational goal toward a science degree as well as to promote involvement in the Federal Subsistence Management Program.

7. Indigenous Rights

Former Representative of the Interior, Stewart Udall, provided testimony prior to the passage of ANILCA of 1980 as it relates to subsistence. The Alaska Federation of Natives recently passed a resolution supporting a Native plus rural preference.

The Council requests the Board to review the testimony of former Secretary of Interior Udall on ANILCA of 1980, and the recent resolution of the AFN in support of Native plus a rural preference for hunting and fishing on all Federal public lands in Alaska. The Council would appreciate comments back from its review.

8. Federal Subsistence Management Proposals

The Council addresses regulatory proposals on fish and wildlife and develops recommendations for the Board's consideration. In some cases, the Office of Subsistence Management preliminary conclusions may say support to "align" with current State hunting or fishing regulatory languages and/or the Board may also use the term in its deliberations.

The Council discourages the Board and staff from using the phrase “aligning or align” proposed Federal regulations with the State of Alaska regulations. Our reasoning is there is an implication the Federal program is following the lead of the State of Alaska when the Federal Program in our opinion is the lead. Rural users hear the wrong message by the use of those words.

9. Subsistence Resources – Local Observations

Subsistence, sport and recreational users in the field have observed, on fish and wildlife resources, abnormal growths, or invasive plant species present in their communities. These events are occurring with increased frequency due to environmental factors.

We encourage the Board, with interagency effort, to provide technical or scientific reports of events outlining these phenomena occurring on the resources. These reported events gathered from marine, terrestrial, and plant species observations can be shared with other Federally managed programs such as Migratory Birds and Marine Mammal Protection and with communities within the Southcentral region to help explain and understand the investigative results.

10. All RAC meeting

We support an All Council meeting in 2015 and will provide some suggestions for agenda items. For those who attended the previous one, they recall it was an excellent meeting and well worth the effort and expense

We also recommend Council Chairs get together to exchange information and learn challenges and successes of other Councils.

Charter Revisions

The Council voted to support the charter revisions adding the following language: Members will be appointed for 4-year terms. If no successor is appointed on or prior to the expiration of a member’s term, then the incumbent member may continue to serve until the new appointment is made or 120 days past the expiration of term, whichever is sooner. A vacancy on the Council will be filled by an appointed alternate, if available, or in the same manner in which the original appointment was made. Members serve at the discretion of the Secretary.

Agency Reports

Mr. Ardizzone provided a briefing on the RFR specifically on the Kenai River subsistence gillnet proposal. The Council was informed that a letter was sent to the North Pacific Fisheries Management Council from the Department of Interior to the Department of Commerce regarding a seat on the Fisheries Management Council.

Native Village of Eyak presented a presentation on Fisheries Research for the Copper River area.

Mr. Tom Whitford, US Forest Service provide a report of recent resource management activities occurring with the Forest Service. Ms. Mary Rasmuson provides a briefing on the Forest Service management plan process and Mr. Robert Skorkowsky provided briefing on resource mangement activities from the Cordova Ranger District. Mr. Robert Stovall and Mr. Jeff Bryden, Seward ranger district provided briefing on resource management activities.

Future Meeting Dates

Fall meeting dates were changed to 21-22 October and the meeting location was changed to Copper Center. The Council was briefed on the all council meeting and did not disagree with what was laid out, to include dates.

Adjournment

Meeting adjourned.

I hereby certify that, to the best of my knowledge, the forgoing minutes are accurate and complete.

\s\ Donald Mike

Donald Mike, DFO
Regional Advisory Council Coordinator

Ralph Lohse, Chair
Southcentral Subsistence Regional Advisory Council

These minutes will be formally considered by the Southcentral Subsistence Regional Advisory Council at its next meeting on October 28, 2015, and any corrections or notations will be incorporated in the minutes of that meeting.



U.S. Fish and Wildlife Service
Bureau of Land Management
National Park Service
Bureau of Indian Affairs



Forest Service

Federal Subsistence Board News Release

For Immediate Release:
July 29, 2015

Contact: Deborah Coble
(907) 786-3880 or (800) 478-1456
deborah_coble@fws.gov

Federal Subsistence Board work session summary

During its work session held on Tuesday, July 28, 2015 the Federal Subsistence Board (Board) discussed deferred Request for Reconsideration RFR14-01. The motion to accept the State's request for reconsideration failed unanimously with a vote of 0-8. The Red Sheep and Cane Creek drainages will remain closed to non-Federally qualified subsistence users during the Aug 10-Sept. 20 sheep season in the Arctic Village Sheep Management Area of Unit 25. No further public comments were received regarding the issue at this work session.

The Rural Determination Process briefing was divided into three phases. Phase I addressed the Board's recommendation on the current secretarial proposed rule. The Board voted to recommend to the Secretaries to adopt the proposed rule as written. Phase II was determining a starting point for non-rural communities/areas. The Board voted to publish a direct final rule adopting the pre-2007 non-rural determinations. Phase III was direction on future non-rural determinations. The Board voted to direct staff to develop options to determine future non-rural determination for the Board's consideration. All three requests passed unanimously (8-0). OSM staff is expected to have a draft of options for the Board by the January 2016 meeting.

The Ninilchik Traditional Council submitted requests concerning the Kenai River gillnet fishery to the Board. The Board voted 7-1 to direct USFWS to continue working with NTC on an operational plan for the fishery. The request to rescind USFWS in-season manager's delegation of authority failed unanimously in a 0-8 vote. The request to reverse the emergency special action that closed the subsistence fishery for Chinook Salmon on the Kenai River failed in a 4-4 vote. NTC's final request to remove or amend current regulatory language on the Kenai River gillnet fishery was deferred and may be addressed during the next regulatory cycle.

Also discussed today during the work session was the 10 Subsistence Regional Advisory Council's Annual Report Replies. The RAC nominations discussion will occur during a closed executive session today, July 29, 2015 and is not open to the public.

1011 East Tudor Road MS-121 • Anchorage, Alaska 99503-6199 • subsistence@fws.gov • (800) 478-1456 / (907) 786-3888
This document has been cleared for public release # 1807292015.

Additional information on the Federal Subsistence Management Program may be found on the web at www.doi.gov/subsistence or by visiting www.facebook.com/subsistencealaska.

Missing out on the latest Federal subsistence issues? If you'd like to receive emails and notifications on the Federal Subsistence Management Program you may subscribe for regular updates by emailing fws-fsb-subsistence-request@lists.fws.gov.

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Options for Board Recommendation on Current Secretarial Proposed Rule

The Board has four options for consideration:

1. Adopt as written;
2. Reject,
3. Adopt with Modification; or
4. Adopt and include in the preamble, direction for OSM and the ISC to develop a policy to address future nonrural determinations.

Program staff recommend the proposed rule be adopted as written. This action would be in line with the majority of the Regional Advisory Councils recommendations and public comments. It would also provide the shortest timeline and greatest opportunity for the resolution of this issue prior to the May 2017 deadline. If the Board does not take action prior to the deadline, communities that were selected to change from rural to nonrural in the 2007 final rule will become effective.

Options for Board Action to Determine Start-point for Nonrural Communities/Areas

The Board has three options to address rural determinations following action on the proposed rule. *If no action is taken, the 2007 final rule will become effective in May 2017.*

1. Initiate a direct final rule to adopt the pre-2007 rural determinations;
2. Initiate normal rulemaking to adopt an earlier rural determination;
3. Initiate rulemaking that would not address a start point and address each community individually.

Program staff recommend the Board initiate a direct final rule that would adopt the pre-2007 rural determinations. This action would resolve any current issues with communities/areas that were changed to nonrural in the 2007 final rule. If significant negative response from the public occurred, the direct final rule could be withdrawn and normal rulemaking could be undertaken. This option provides the shortest timeline and greatest opportunity for the resolution of this issue prior to the May 2017 deadline.

Options for Board to Direct Future Nonrural Determinations

To address future nonrural determinations, the Board has two options. The Board may direct staff to develop a draft nonrural determinations policy on how future determinations will be made; or, the Board may initiate rulemaking to address future determinations.

Program staff recommend the Board direct a policy to be drafted to address future nonrural determinations. This action will allow the greatest flexibility for Board action and the inclusion of regional variations. This option addresses concerns raised by some of the Councils (what the process of future nonrural determinations will be). Additionally it would require less time and the policy could be revised without formal rulemaking. Potential policy components could address nonrural characteristics with weighting potential that would accommodate regional variation and criteria for initiating a review of a community or area. The rural subcommittee, whose membership consists of program staff and ISC members, would develop the policy with input from the Councils, tribes, and public over the next 18 months with a goal of adoption by the Board in early 2017.

Rural Determination Recommendation Phases July 28, 2015

Phase I
Options for Board Recommendation on Current Secretarial Proposed Rule

Board Option	Pro	Con	Timeline	Notes
1. Adopt as written	<ul style="list-style-type: none"> - Shortest timeline - Majority of comments support 	<ul style="list-style-type: none"> Lacks guidance on future actions 	Publish mid-August 2015 (timeline is based on how long it would take staff to process the final rule; the response time from the Secretaries will be critical in any timeline)	<ul style="list-style-type: none"> - This option provides the greatest opportunity for the Board to resolve this issue well prior of the May 2017 deadline - Guidance for future actions could be addressed in preamble of final rule
2. Adopt with directive to develop/maintain policy	<ul style="list-style-type: none"> - Would address some of the public comments - Likely will meet proposed timeline for rule completion 	<ul style="list-style-type: none"> - Would probably add 60 days to the publication date - Secretaries could direct another round of public comments; adding considerable time and possibility that will not meet intended timeline for decision making 	Publish October 2015	<ul style="list-style-type: none"> - This option may not meet the May 2017 deadline if the Board is directed to allow for additional public comment - The preamble could address the Board's policy making plan (if that option is selected)
3. Adopt with substantial modification (a) RAC deference (b) List nonrural criteria	<ul style="list-style-type: none"> - Would address some of the public/RAC comments 	<ul style="list-style-type: none"> - Goes against Secretaries' intent to simplify the process - Would likely require additional public comment period - May require additional proposed rule, which could affect ability to meet May 2017 deadline 	Publish November 2016	
4. Reject		<ul style="list-style-type: none"> - 2007 final rule becomes effective on May 7, 2017 - Does not follow Secretarial directive to address rural issue - Does not address the majority of public comments received 	No action to be taken	

Rural Determination Recommendation Phases July 28, 2015

Phase II
Options for Board Action to Determine Start-point for Nonrural Communities/Areas

Board Option	Pro	Con	Timeline	Notes
1. Direct final rule adopting the nonrural communities pre-2007 final rule	<ul style="list-style-type: none"> - Shortest timeline - Provides foundation for nonrural 	<ul style="list-style-type: none"> Possible public disapproval due to lack of current public input 	Publish September 2015	Communities that were ruled as nonrural in 2007 final rule would become rural
2. Initiate new formal rulemaking to revert to pre-2007 rural determinations	<ul style="list-style-type: none"> - Would have RAC and public comment periods 	<ul style="list-style-type: none"> Process could take up to a year to complete 	Publish July 2016	
3. Initiate new formal rulemaking with no "start point" and address each nonrural community on a case by case basis.		<ul style="list-style-type: none"> - Process could take 2+ years to complete - 2007 final rule becomes effective on May 7, 2017 	Publish July 2017 or later	Communities selected in 2007 final rule to change status from rural to nonrural become nonrural

Phase III
Options for Board to Direct Future Nonrural Determinations

Board Option	Pro	Con	Timeline	Notes
1. Direct staff to draft policy on nonrural determinations	<ul style="list-style-type: none"> - Allows greatest flexibility for Board actions and the inclusion of regional variations - Requires less time than formal rulemaking 			Would depend on Board's direction for public, RAC and Tribal input
2. Direct staff to initiate formal rulemaking to address future nonrural determination		<ul style="list-style-type: none"> Any future revisions would require formal rulemaking 	Approximately 1 year	

Alaska Refuges

Possible Statewide Regulatory Changes



Lisa Hupp/USFWS

Kodiak brown bear sow with cub.

National Wildlife Refuges (refuges) in Alaska are mandated to conserve species and habitats in their natural diversity and ensure that the biological integrity, diversity, and environmental health of the National Wildlife Refuge System are maintained for the continuing benefit of present and future generations of Americans. The U.S. Fish and Wildlife Service (USFWS) is proposing changes to the regulations governing Alaska refuges (under 50 CFR 36) to ensure that we are managing those refuges in accordance with our mandates and to increase consistency with other Federal laws, regulations, and policies. In addition, we aim to more effectively engage the public by updating our Public Participation and Closure Procedures to broaden notification and outreach methods, ensure consultation with Tribes and the State, provide for increased transparency in our decision-making, and to allow for additional opportunities for the public to provide input.

We recognize the importance of the fish, wildlife and other natural resources in the lives and cultures of Alaska Native peoples and in the lives of all Alaskans. These proposed regulatory changes would not change Federal subsistence regulations (36 CFR 242 and 50 CFR 100) or restrict taking of fish or wildlife under Federal subsistence regulations. The Alaska National Interest Lands Conservation Act (ANILCA) provides a priority to rural Alaskans for the nonwasteful taking of fish and wildlife for subsistence uses on refuges in Alaska. Under ANILCA all refuges in Alaska (except the Kenai Refuge) also have a purpose to provide the opportunity for continued subsistence use by rural residents, as long as this use is not in conflict with refuge purposes to conserve fish and wildlife populations and habitats in their natural diversity or fulfill international treaty obligations of the United States.

The changes we are considering would:

- Codify existing Federal mandates for conserving the natural diversity, biological integrity, and environmental health on refuges in Alaska in relation to predator harvest.

Predator control is not allowed on refuges in Alaska unless it is determined to be necessary to meet refuge purposes, federal laws, or policy and is consistent with our mandates to manage for natural and biological diversity and environmental health. The need for predator control must be based on sound science in response to a significant conservation concern. Demands for more wildlife to harvest cannot be the sole or primary basis for predator control on refuge in Alaska.

- Prohibit the following particularly efficient methods and means for non-subsistence (Federal) take of predators on refuges in Alaska due to the potential for cumulative effects to predator populations and the environment that are inconsistent with our mandates to conserve the natural and biological diversity, biological integrity, and environmental health on refuges in Alaska:
 - take of bear cubs or sows with cubs (exception allowed for resident hunters to take black bear cubs or sows with cubs under customary and traditional use activities at a den site October 15 – April 30 in specific game management units in accordance with State law)
 - take of brown bears over bait;
 - take of bears using traps or snares;
 - take of wolves and coyotes during the spring and summer denning season (May 1– August 9); and
 - take of bears from an aircraft or on the same day as air travel has occurred (take of wolves or wolverines from an aircraft or on the same day as air travel is already prohibited under current refuge regulations).
- Update the Public Participation and Closure Procedures. The following table summarizes the current regulations for the Public Participation and Closure Procedures and updates we are considering.

Public Participation and Closure Procedures

Current	Proposed Updates
Authority	
Refuge Manager may close an area or restrict an activity on an emergency, temporary, or permanent basis.	No updates
Criteria (50 CFR 36.42(b))	
Criteria includes: public health and safety, resource protection, protection of cultural or scientific values, subsistence uses, endangered or threatened species conservation, and other management considerations necessary to ensure that the activity or area is being managed in a manner compatible with refuge purposes.	Add conservation of natural and biological diversity, biological integrity, and environmental health to the current list of criteria.
Emergency closures or restrictions (50 CFR 36.42(c))	
Emergency closure may not exceed 30 days. Closure effective upon notice as prescribed in 50 CFR 36.42 (f) (see below for details). Closures related to the taking of fish and wildlife shall be accompanied by notice with a subsequent hearing.	Increase the period from 30 to 60 days, with extensions beyond 60 days being subject to nonemergency closure procedures (i.e. temporary or permanent). Closure effective upon notice as prescribed in 50 CFR 36.42 (f) (see below for details).
Temporary closures or restrictions (50 CFR 36.42(d))	
May extend only for as long as necessary to achieve the purpose of the closure or restriction, not to exceed or be extended beyond 12 months. Closure effective upon notice as prescribed in 50 CFR 36.42 (f) (see below for details). Closures related to the taking of fish and wildlife effective upon notice and hearing in the vicinity of the area(s) affected by such closures or restriction, and other locations as appropriate	Temporary closures or restrictions related to the taking of fish and wildlife may still only extend for so long as necessary to achieve the purpose of the closure or restriction. These closures or restrictions must be re-evaluated as necessary, at a minimum of every 3 years, to determine whether the circumstances necessitating the closure still exist and warrant its continuation. A formal finding will be made in writing that explains the reasoning for the decision. When a closure is no longer needed, action to remove it will be initiated as soon as practicable. The USFWS will maintain a list of refuge closures and publish this list annually for public review and input. Closure will be subject to notice procedures as prescribed in 50 CFR 36.42 (f) (see below for details). For closures related to the taking of fish and wildlife, consultation with the State and affected Tribes and Native Corporations, as well as the opportunity for public comment and a public hearing in the vicinity of the area(s) affected will be required.
Permanent closures or restrictions (50 CFR 36.42(e))	
No time limit. Closure effective after notice and public hearings in the affected vicinity and other locations as appropriate, and after publication in the Federal Register.	No time limit. For closures related to the taking of fish and wildlife, consultation with the State and affected Tribes and Native Corporations, as well as the opportunity for public comment and a public hearing in the vicinity of the area(s) affected will be required. Closures would continue to be published in the Federal Register.
Notice (50 CFR 36.42(f))	
Notice is to be provided through newspapers, signs, and radio.	Add the use of the Internet or other available methods, in addition to continuing to use the more traditional methods of newspapers, signs, and radio.

For more information, please visit:
http://www.fws.gov/alaska/nwr/ak_nwr_pr.htm



Questions and Answers on Regulatory Changes Being Proposed by the U.S. Fish & Wildlife Service for National Wildlife Refuges in Alaska

1. What are the proposed regulatory changes?

National Wildlife Refuges (refuges) in Alaska are mandated to conserve species and habitats in their natural diversity and ensure that the biological integrity, diversity, and environmental health of the National Wildlife Refuge System (Refuge System) are maintained for the continuing benefit of present and future generations of Americans. The U.S. Fish and Wildlife Service (USFWS) is proposing changes to the regulations governing Alaska refuges (under 50 CFR 36) to ensure that we are managing those refuges in accordance with our mandates and to increase consistency with other Federal laws, regulations, and policies. In addition, we aim to more effectively engage the public by updating our Public Participation and Closure Procedures to broaden notification and outreach methods, ensure consultation with Tribes and the State of Alaska (State), provide for increased transparency in our decision-making, and allow for additional opportunities for the public to provide input.

The changes we are proposing would:

- Codify existing Federal mandates for conserving the natural diversity, biological integrity, and environmental health on refuges in Alaska in relation to predator harvest. Predator control is defined as the intention to reduce the populations of predators for the benefit of prey species. Predator control is not allowed on refuges in Alaska, unless it is determined necessary to meet refuge purposes, Federal laws, or policy and is consistent with our mandates to manage for natural and biological diversity, biological integrity, and environmental health. The need for predator control must be based on sound science in response to a significant conservation concern. Demands for more wildlife for human harvest cannot be the sole or primary basis for predator control on refuges in Alaska.
- Prohibit the following particularly efficient methods and means for non-subsistence take of predators on refuges in Alaska due to the potential impacts to predator populations and the environment that are inconsistent with our mandates to conserve the natural and biological diversity, biological integrity, and environmental health on refuges in Alaska:
 - take of bear cubs or sows with cubs (*exception allowed for resident hunters to take black bear cubs or sows with cubs under customary and traditional use activities at a den site October 15 – April 30 in specific game management units in accordance with State regulations*);
 - take of brown bears over bait;
 - take of bears using traps or snares;
 - take of wolves or coyotes from May 1 – August 9; and
 - take of bears from an aircraft or on the same day as air travel has occurred (*same day airborne take of wolves or wolverines is already prohibited under current refuge regulations*).
- Update the Public Participation and Closure Procedures to make them more consistent with other Federal regulations and more effectively engage the public.

Important notes:

- These proposed changes would not apply to the take of fish or wildlife under Federal subsistence regulations or to defense of life and property as defined in State of Alaska (State) regulations (see 5 AAC 92.410).
- Hunting and trapping is considered a priority use of refuges in Alaska and most State of Alaska hunting and trapping regulations, including harvest limits, would still apply.

2. Why is the U.S. Fish & Wildlife Service proposing making these changes?

We are considering these regulatory changes to ensure that the taking of fish and wildlife on National Wildlife Refuges in Alaska is managed consistent with Federal laws, regulations, and USFWS policies. The proposed regulatory changes we are considering would clarify allowable practices for the non-subsistence take of wildlife on refuges in Alaska, as well as update existing Alaska refuge regulations for closures and restrictions.

The mission of the Refuge System is to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans. As such, refuges are required to work to conserve species and habitats for the long-term, benefiting not only the present, but also future generations of Americans and in Alaska, this includes the continuation of the subsistence way of life.

The USFWS is required by law to manage refuges “to ensure that . . . biological integrity, biological diversity, and environmental health are maintained” (National Wildlife Refuge System Administration Act of 1966, as amended by the National Wildlife Refuge System Improvement Act of 1997). The Alaska National Interest Lands Conservation Act (ANILCA) states that the primary purpose of the Act is “to preserve for the benefit, use, education, and inspiration of present and future generations certain lands and waters in the State of Alaska that contain nationally significant natural, scenic, historic, archeological, geological, scientific, wilderness, cultural, recreational, and wildlife values...” The first purpose for all refuges in Alaska under ANILCA is to “conserve fish and wildlife populations and habitats in their natural diversity.”

In managing for natural diversity, the USFWS conserves, protects and manages all fish and wildlife populations within a particular wildlife refuge system unit in the natural ‘mix,’ not to emphasize management activities favoring one species to the detriment of another. The USFWS assures that habitat diversity is maintained through natural means on refuges in Alaska, avoiding artificial developments and habitat manipulation programs, whenever possible. The USFWS fully recognizes and considers that rural residents utilize and are often dependent on refuge resources for subsistence purposes and manages for this use consistent with the conservation of species and habitats in their natural diversity. The terms biological integrity, diversity, and environmental health are defined in the biological integrity policy, which directs the USFWS to maintain the variety of life and its processes; biotic and abiotic compositions, structure, and functioning; and to manage populations for natural densities and levels of variation throughout the Refuge System.

The overarching goal of the USFWS’s wildlife-dependent recreation policy is to enhance opportunities and access to quality visitor experiences on refuges and to manage the refuge to conserve fish, wildlife, plants, and their habitats (605 FW 1.6). We consider hunting to be one of many priority uses of the Refuge System (when and where compatible with refuge purposes) that is a healthy, traditional outdoor pastime, deeply rooted in the American heritage (605 FW 2).

These proposed regulatory changes are aimed at ensuring that natural ecological processes and functions are maintained and wildlife populations and habitats are conserved and managed to function in their natural diversity on Alaska refuges.

3. Will the proposed regulatory changes apply to subsistence hunting and trapping on National Wildlife Refuges?

We recognize the importance of fish and wildlife and other natural resources in the lives of all Alaskans and in the lives and cultures of Alaska Native peoples. We take seriously our responsibility to provide the opportunity for continued subsistence use by rural Alaskans on refuges under ANILCA. These proposed regulatory changes will not change Federal subsistence regulations (36 CFR 242 and 50 CFR 100) or restrict taking of fish or wildlife under Federal subsistence regulations.

We recognize there may be some impacts to local communities that result from these changes. We have worked to address concerns that were raised during Tribal consultations and early public scoping in rural communities, and are open to discussing others that arise through the public comment process.

4. What authority does the U. S. Fish & Wildlife Service have to establish hunting and trapping regulations? Isn't it the State's job to manage wildlife in Alaska?

We recognize that the State has obligations to manage wildlife in Alaska according to the directives in the State constitution. The USFWS similarly must ensure that activities on refuges are consistent with Federal laws and USFWS policy and has final authority for managing plants, fish, and wildlife on refuges in Alaska. We prefer to defer to the State on regulation of hunting and trapping on refuges in Alaska; unless, in doing so, we are out of compliance with Federal laws and USFWS policy.

**5. What is the process and timeline for making these regulatory changes?
Can I participate?**

We have been consulting with Alaska Tribes and Alaska Native Claims Settlement Act (ANCSA) Corporations, as well as having discussions with the State and Federal Subsistence Regional Advisory Councils on the changes we are considering. We anticipate publishing a proposed rule (draft regulations) in the Federal Register around mid to late July of 2015, at which time a 90 day public comment period will begin. We have prepared an Environmental Assessment (EA) in accordance with the requirements of the National Environmental Policy Act (NEPA) for these proposed regulatory changes, which will be made available for comment at the same time. Public input is very important to us and in order to allow additional time for folks to provide input, we will be offering a 90 day comment period, as opposed to the traditional duration of 30 days. During the public comment period, we plan to hold meetings and hearings around the state in locations near Alaska refuges and other locations as appropriate. Comments and input we receive will inform the revision and finalization of the proposed rule. Our goal is to have a final rule published sometime in the beginning of 2016.

Local engagement is very important to us and we are committed to providing meaningful opportunities for consultation with the Tribal Governments and ANCSA Corporations in Alaska. We greatly value local knowledge in our work and are committed to strengthening our Tribal-Federal government relations by working closely with the Tribes on conservation issues in Alaska.

We would like to hear from you, whether at a community meeting or via written comment. We welcome public comment during the comment period, and will continue to offer Tribal Consultation to Federally recognized Tribes and ANCSA Corporations through the end of the comment period.

For the most current information, visit http://www.fws.gov/alaska/nwr/ak_nwr_pr.htm.

WP16–10a Executive Summary	
General Description	Proposal WP16-10a requests that rural residents of Unit 6D be included in the customary and traditional use determination for moose in Unit 6D. <i>Submitted by Andy McLaughlin of Chenega Bay.</i>
Proposed Regulation	Customary and Traditional Use Determination-Moose <i>Unit 6D</i> <i>No Federal subsistence Priority Residents of Unit 6D</i>
OSM Preliminary Conclusion	Support
Southcentral Alaska Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None

DRAFT STAFF ANALYSIS
WP16-10a

ISSUES

Proposal WP16-10a, submitted by Andy McLaughlin of Chenega Bay, requests that rural residents of Unit 6D be included in the customary and traditional use determination for moose in Unit 6D.

DISCUSSION

The proponent notes that State regulations are more lenient than the Federal regulations because currently there is no Federal subsistence priority for moose in unit 6D. Residents of Chenega Bay and Tatitlek have historically harvested moose in areas such as the Kings Bay drainage area in Unit 7; or in the Copper River delta, near Cordova; and in the Lowe River drainage, outside of Federal public lands in Unit 6D. While moose populations in Prince William Sound are limited by available habitat, a positive customary and traditional use determination for moose in Unit 6D, and an established Federal open season, would allow rural residents of Unit 6D to harvest moose when the population increases (**Map Unit 6**). Proposal WP 16-10b, requests that an open season be established in Unit 6D for the harvest of one bull moose for Federally qualified users with a season of Sept. 1 to Dec 31.

Existing Federal Regulations

Customary and Traditional Use Determinations – Moose

Unit 6D

No Federal subsistence priority

Proposed Federal Regulation

Customary and Traditional Use Determinations – Moose

Unit 6D

*~~No Federal subsistence Priority~~ Residents of Unit
6D*

Extent of Federal Public Lands

Federal public lands comprise 67% of Unit 6D and consist of 65% U.S. Forest Service (USFS) managed lands and 2% Bureau of Land Management (BLM) managed lands (**see map Unit 6**).

Regulatory History

The Alaska Department of Fish and Game (ADF&G) has managed a hunt for any bull moose in Unit 6D with season dates running from Sept. 1 through Sept. 30 for over 20 years. Both Alaska residents and nonresidents are eligible. There is currently no open season under Federal regulations to hunt moose and, no customary and traditional use determination for moose in Unit 6D.

At its April 1997 meeting, the Federal Subsistence Board (Board) adopted a customary and traditional use determination for moose in the Kings Bay drainage portion of Unit 7 for the residents of Chenega Bay and Tatitlek (Proposal P97-018b). The Board adopted Proposal P97-02 with modification to create a season from Aug. 10 – Sept. 20 and a harvest limit of 2 moose per community for residents of Chenega Bay and Tatitlek. It also closed Federal public lands to all other users (FSB 1997).

Residents of 6D, except for Whittier, have a customary and traditional use determination for black bear in Unit 6A and the remainder of Unit 6. Residents of 6D, except for Whittier, have a customary and traditional use determination for goat in Units 6A, 6C, 6D and 6 remainder.

Emergency Special Action WSA01-02, submitted by the Chugach National Forest, requested that the Aug. 10 – Sept. 20 moose season in the Kings Bay drainage of Unit 7 be closed to all users for the 2001 season. This Special Action was approved by the Board which determined that the moose population was too small to support a harvest.

WP06-18, submitted by the Native Village of Chenega, requested that residents of Chenega Bay be added to those with a customary and traditional use determination for moose in Unit 6C. The Native Village of Chenga also requested a permit to take one bull moose annually for a ceremonial potlatch. While the proposal was not adopted by the Board, the staff analysis noted that a harvest use area for moose at Kings Bay in Unit 6D was mapped in 1985 and 1986 and hunters expressed hope that they could hunt moose there again in the future (Stratton and Chisum 1986:82-84).

In 2014, the Board adopted Proposal WP 14-10 establishing a customary and traditional use determination for moose in the Kings Bay drainage portion of Unit 7 for the residents of Chenega Bay and Tatitlek, recognizing their traditional use of moose in this area. The Board also adopted Proposal WP 16-11 establishing a limited moose hunt of one bull per community for Chenega Bay and Tatitlek every four years.

Community Characteristics

The proposal seeks to include rural residents of Unit 6D, which includes rural residents of Whittier, Chenega Bay and Tatitlek, in a customary and traditional use determination for moose in Unit 6D. The communities of Chenega Bay and Tatitlek are both predominantly Chugach Alutiiq villages. In 2014, Whittier had a population of 234; Tatitlek had a population of 98; and Chenega Bay had a population of 57 people (Community Database Online 2015).

The old village of Chenega on Chenega Island, near Port Nellie Juan and relatively close to Kings Bay was founded before the Russians arrived in the area in the late 1700s; it was the longest occupied village in Prince William Sound. It was first reported in the 1880 Census. Chenega was destroyed by a tsunami triggered by an earthquake in 1964. The survivors were evacuated to Cordova and then relocated to Tatitlek by the Bureau of Indian Affairs (Community Database Online 2015). Nearly all the original Chenega residents enrolled in their original village, and formed the Chenega Corporation under the

Alaska Native Claims Settlement Act. A new village of Chenega Bay was established on Evans Island, to the south of the old village, and many of the original residents of Chenega moved to Chenega Bay in 1984 (Davis 1984). The village is only accessible by air or by boat and residents practice a subsistence lifestyle (Community Database Online 2015).

Tatitlek is an unincorporated coastal village, located on the northeast shore of the Tatitlek Narrows on the Alaska mainland in Prince William Sound. It was first reported in the 1880 Census with a population of 73. Originally located at the head of Gladhaugh Bay, the village moved to its present location around 1900. The village is governed by an Indian Reorganization Act Village Council, which was formed in 1934. The village is only accessible by air or by boat and residents practice a subsistence lifestyle (Community Database Online 2015).

Whittier was established in 1943 as a military complex, after the completion of the railroad to Whittier. The area where Whittier is located was originally part of a portage area used by the Chugach Natives of Prince William Sound as they traveled to fish in Turnagain Arm (Whittier, Alaska 2015). The city was incorporated in 1969 (Community Database Online 2015).

For the purposes of this analysis, residents of Whittier are residents of the Whittier Census Designated Place; residents of Chenega Bay are the residents of the Chenega Bay Census Designated Place; residents of Tatitlek are residents of the Tatitlek Census Designated Place. In the 2010 U.S. Census, the Chenega Bay Census Designated Place represented the entire Evans Island, including a small group of residents at Sawmill Bay. The Tatitlek Designated Place represents the village of Tatitlek and the small group of residents at Ellamar (U.S. Census 2013).

Eight Factors for Determining Customary and Traditional Uses

A community or area's customary and traditional use is generally exemplified through eight factors: (1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area; (2) a pattern of use recurring in specific seasons for many years; (3) a pattern of use consisting of methods and means of harvest which are characterized by efficiency and economy of effort and cost, conditioned by local characteristics; (4) the consistent harvest and use of fish or wildlife as related to past methods and means of taking: near, or reasonably accessible from the community or area; (5) a means of handling, preparing, preserving, and storing fish or wildlife which has been traditionally used by past generations, including consideration of alteration of past practices due to recent technological advances, where appropriate; (6) a pattern of use which includes the handing down of knowledge of fishing and hunting skills, values, and lore from generation to generation; (7) a pattern of use in which the harvest is shared or distributed within a definable community of persons; and (8) a pattern of use which relates to reliance upon a wide diversity of fish and wildlife resources of the area and which provides substantial cultural, economic, social, and nutritional elements to the community or area. The Board makes customary and traditional use determinations based on a holistic application of these eight factors (50 CFR 100.16(b) and 36 CFR 242.16(b)). In addition, the Board takes into consideration the reports and recommendations of any appropriate Regional Advisory Council regarding customary and traditional use of subsistence resources (50 CFR 100.16(b) and 36 CFR 242.16(b)).

The Board makes customary and traditional use determinations for the sole purpose of recognizing the pool of users who generally exhibit the eight factors. The Board does not use such determinations for resource management or restricting harvest. If a conservation concern exists for a particular population, the Board addresses that concern through the imposition of harvest limits or season restrictions rather than by limiting the customary and traditional use finding.

Specific information on each of the eight factors is not required because a community or area seeking a customary and traditional use determination only has to “generally exhibit” the eight factors (50 CFR 100.16(b) and 36 CFR 242.16(b)).

In 1949, a few moose calves were introduced in Unit 6C. There was originally little use of moose by these communities and the first harvest in Unit 6C took place in 1960. According to a report by Stratton and Chisum, only four hunters living in Chenega reported harvesting moose in a typical year during the 1960s (Stratton and Chisum 1986). Later household surveys showed some years with little or no harvest of moose during the 1980s and 90s in Chenega Bay and Tatitlek (ADF&G 2015).

At the beginning of the historical era in the late 1700s, settlement was along the deeply embayed coast or a few miles inland along salmon-bearing streams characterized by ice-free winters. This was a maritime culture known for hunting marine mammals and saltwater fishing. The Alutiiq are noted for their development of the two-hatch kayak. Land mammals were also pursued (Clark 1984).

When the Russians arrived in the late 1700s they diverted Alutiiq subsistence activities and trade to the Russian fur trade, often through coercion. The Russians altered the natural annual cycle of economic activities followed by Alutiiq (Clark 1984). Many were held at Nuchek, a trading post established by Russians on Hinchinbrook Island, and dispersed after the sale of Alaska to the United States (Fall et al. 2001). In the late 1800s, there were two Alutiiq settlements in western Prince William Sound, Chenega and Kiniklik; and two in eastern Prince William Sound, Tatitlek and Nuchek. Some residents participated in fur farming, mining, and fishing industries while pursuing a subsistence way of life.

The current town of Whittier was established as a military port in the 1940s and was incorporated in 1969. Today tourism forms the base of the economy, providing many of the local jobs, along with jobs working for the State and Federal government. Cruise ships dock at Whittier and people come to Whittier to participate in both commercial and recreational fisheries.

The basis of the cash economy in many Alutiiq communities has been commercial fishing; however, participation in commercial fishing has declined in recent years. In 1989, the Exxon Valdez oil spill occurred in marine waters adjacent to Tatitlek. The spill disrupted the lives of people in most Alutiiq villages in the region. The 1990s were a time of questioning the safety and health of wild resources (Fall 2006). The subsistence economies in Chenega Bay and Tatitlek appeared to rebound when in 2003, subsistence harvests in the villages were found to be substantial. In 2003, the harvest by Chenega Bay residents was estimated to be 470 pounds per person. The average number of wild resources used per

household was 24; compared to an estimated per capita harvest of 176 pounds and mean household use of 12 resources in Cordova (ADF&G 2013). The comparable values for Tatitlek residents were an estimated harvest of 290 pounds per capita and mean household use of 21 different wild resources.

Stratton and Chisum (1986) reported that in the past, moose were occasionally taken by Chenega and Tatitlek residents while they were hunting for goat; the usual times for goat hunting being in fall and winter. In the 1960s, hunters from the old village of Chenega took moose in the fall, which was the traditional season to hunt large land mammals. Moose hunting by Tatitlek residents in the 1980s also took place in the fall (Stratton 1986). Residents of Chenega Bay or Tatitlek participated in household harvest surveys in the 1980s, 1990s, and 2000s. According to the surveys, moose were harvested and the meat was shared with other households.

Moose meat is widely shared by residents of Unit 6D. Residents of Chenega Bay share and distribute moose meat within and beyond their villages. Even in years when there is no reported harvest of moose by residents of Unit 6D, there are reports of receiving moose from relatives or friends from other communities. ADF&G (2001) found that in most years, a higher percentage of respondents reported receiving moose meat than did harvesting moose, suggesting a pattern of redistribution of shared resources.

Moose were introduced in the Copper River Delta, and the numbers of moose documented in Unit 6D has been relatively low. However, the customary and traditional uses of moose by residents of Chenega Bay and Tatitlek have already been recognized by the Board, although most of these were harvested outside of Unit 6D. For example, in 2014, The Board adopted a customary and traditional use determination for moose in the Kings Bay drainage portion of Unit 7 for the residents of Chenega Bay and Tatitlek, recognizing their traditional use of moose in this area (Proposal WP 14-10).

The ADF&G and the U.S. Fish and Wildlife Service (ADF&G/FWS) also maintain a harvest reporting database (FWS 2015). However, complete records were not kept until the mid-1980s. **Table 1** displays the harvest of moose reported by residents of Chenega Bay, Tatitlek, and Whittier from 1985 to 2010, cumulative, for the years available.

Table 1. Total Moose Harvest by Residents of Chenega Bay, Tatitlek, and Whittier (ADF&G 2015).

Community	Year	Percentage of Households					Moose Harvest			
		Using moose (%)	Hunt moose (%)	Harvest moose (%)	Give moose (%)	Receive moose (%)	Estimated Harvest (number)	Lower Estimate (number)	Higher Estimate (number)	Per Person (lb)
Chenega Bay	2003	44	6	6	13	44	1	1	2	12
	1997	47	13	13	20	40	3	1	5	26

	1993	4	0	0	4	4	0	0	0	0
	1992	22	0	0	0	22	0	0	0	0
	1991	17	0	0	0	17	0	0	0	0
	1990	6	0	0	0	6	0	0	0	0
	1989	17	6	0	0	17	0	0	0	0
	1985	44	6	6	6	38	1	1	2	9
	1984	38	19	6	19	31	1	1	1	9
Tatitlek	2003	0	0	0	0	0	0	0	0	0
	1997	25	6	0	6	25	0	0	0	0
	1993	5	0	0	5	5	0	0	0	0
	1991	0	0	0	0	0	0	0	0	0
	1990	6	0	0	0	6	0	0	0	0
	1989	14	0	0	0	14	0	0	0	0
	1988	43	0	0	5	43	0	0	0	0
	1987	58	5	5	16	53	2	1	4	7
Whittier	1990	43	8	3	12	42	4	2	5	6

Effects of the Proposal

Although the moose population is low in this area now, if the Board were to adopt this proposal, residents of Unit 6D would have a customary and traditional use determination already in place in the event that the moose population increases to allow for a Federal hunt. The number of moose harvested in this area has historically been low, and it is assumed the harvest numbers would continue to be minimal due to the sparse population of moose in the region. If adopted, this proposal will have no effect on the moose population because; although it will recognize customary and traditional use for the communities in Unit 6D, but there would be no Federal hunt for moose in Unit 6D under current regulations.

OSM PRELIMINARY CONCLUSION

Support Proposal WP 16-10 for rural residents of Unit 6D to be included in the customary and traditional use determination for moose in Unit 6D.

Justification

Whether or not a community receives a customary and traditional use determination is only contingent on fulfilling a past history of harvest in the area. It is not contingent on whether or not there are enough of the resources for federally qualified subsistence users to harvest the resource or what the effects on the resource. Residents of Unit 6D have shown a history of traditional use of moose harvested in Unit 6D. If the Board were to adopt this proposal, residents of Unit 6D would be given a positive customary and traditional use determination for moose in Unit 6D and would have the opportunity to harvest moose in the unit if an open season is established in the future.

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WP16–10b Executive Summary	
General Description	Proposal WP16–10b requests that a Sept. 1 to Dec 31 season be established in Unit 6D for the harvest of one bull moose. <i>Submitted by Andy McLaughlin of Chenega Bay.</i>
Proposed Regulation	Unit 6—Moose <i>Unit 6D – 1 bull</i> <i>Sept. 1 – Dec. 31</i>
OSM Preliminary Conclusion	Oppose
Southcentral Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None

**DRAFT STAFF ANALYSIS
WP16-10b**

ISSUES

Proposal WP16-10, submitted by Andy McLaughlin of Chenega Bay, requests that rural residents of Unit 6D be included in the customary and traditional use determination for moose in Unit 6D which will be addressed in the analysis of proposal WP16-10a. Proposal WP16-10b, which requests that a Sept. 1 to Dec 31 season be established in Unit 6D for the harvest of one bull moose, will only be considered if the Board adopts WP16-10a and recognizes the customary and traditional uses of residents of Unit 6D for moose in Unit 6D.

DISCUSSION

The proponent notes that State regulations are more lenient than the Federal regulations because currently there is no Federal subsistence priority for moose in unit 6D. The proponent further states that rural residents have traditionally harvested moose in the winter and early spring months. Residents of Chenega Bay and Tatitlek have historically harvested moose in areas such as the Kings Bay drainage area in Unit 7; or on the Copper River Delta, near Cordova; and in the Lowe River drainage, outside of Federal public lands in Unit 6D. While moose populations in Prince William Sound are limited by available habitat, a positive customary and traditional use determination for moose in Unit 6D, and an established Federal open season, would allow rural residents of Unit 6D to harvest moose when the population increases.

Existing Federal Regulations

Customary and Traditional Use Determinations – Moose

Unit 6D

No Federal subsistence priority

Hunting Regulations

Unit 6 – Moose

Unit 6C – 1 antlerless moose by Federal drawing permit only Sept. 1 – Oct. 31

Permits for the portion of the antlerless moose quota not harvested in the Sept. 1 – Oct. 31 hunt may be available for redistribution for a Nov. 1 – Dec. 31 hunt.

Unit 6C – 1 bull by Federal drawing permit only Sept. 1 – Dec. 31

In Unit 6C, only one moose permit may be

issued per household. A household receiving a State permit for Unit 6C moose may not receive a Federal permit. The annual harvest quota will be announced by the U.S. Forest Service, Cordova Office, in consultation with ADF&G. The Federal harvest allocation will be 100% of the antlerless moose permits and 75% of the bull permits. Federal public lands are closed to the harvest of moose except by Federally qualified users with a Federal permit for Unit 6C moose, Nov. 1 – Dec. 31.

Unit 6, remainder

No open season

Proposed Federal Regulation

Customary and Traditional Use Determinations – Moose

Unit 6D

~~*No Federal subsistence Priority*~~ ***Residents of Unit 6D***

Hunting Regulations

Unit 6 - Moose

Unit 6C – 1 antlerless moose by Federal drawing permit only

Sept. 1 – Oct. 31

Permits for the portion of the antlerless moose quota not harvested in the Sept. 1 – Oct. 31 hunt may be available for redistribution for a Nov. 1 – Dec. 31 hunt.

Unit 6C – 1 bull by Federal drawing permit only

Sept. 1 – Dec. 31

In Unit 6C, only one moose permit may be issued per household. A household receiving a State permit for Unit 6C moose may not receive a Federal permit. The annual harvest quota will be announced by

the U.S. Forest Service, Cordova Office, in consultation with ADF&G. The Federal harvest allocation will be 100% of the antlerless moose permits and 75% of the bull permits. Federal public lands are closed to the harvest of moose except by Federally qualified users with a Federal permit for Unit 6C moose, Nov. 1 – Dec. 31.

Unit 6D – 1 bull

Sept. 1 – Dec. 31

Unit 6 - remainder

No open season

Existing State Regulations

Unit 6D – Moose

One bull

Sept. 1 – Sept 30

Extent of Federal Public Lands

Federal public lands comprise 67% of Unit 6D and consist of 65% U.S. Forest Service (USFS) managed lands and 2% Bureau of Land Management (BLM lands) (see map Unit 6).

Regulatory History

The Alaska Department of Fish and Game (ADF&G) has managed a hunt for any bull moose in Unit 6D with season dates running from Sept. 1 through Sept. 30 for over 20 years. Both Alaska residents and nonresidents are eligible. There is no Federal hunt for moose or customary and traditional use determination for moose in Unit 6D.

At its April 1997 meeting, the Federal Subsistence Board (Board) adopted a customary and traditional use determination for moose in the Kings Bay drainage portion of Unit 7 for the residents of Chenega Bay and Tatitlek (Proposal P97-018b). The Board adopted Proposal P97-02 with modification to create a season from Aug. 10 – Sept. 20 and a harvest limit of 2 moose per community for residents of Chenega Bay and Tatitlek. It also closed Federal public lands to all other users (FSB 1997).

Emergency Special Action WSA01-02, submitted by the Chugach National Forest, U.S. Forest Service, requested that the Aug. 10 – Sept. 20 moose season in the Kings Bay drainage of Unit 7 be closed to all users for the 2001 season. This Special Action was approved by the Board. The Board determined that the moose population was too small to support a harvest.

WP06-18, submitted by the Native Village of Chenega, requests that residents of Chenega Bay be added to those with a positive customary and traditional use determination for moose in Unit 6C. The Native Village of Chenega also requested a permit to take one bull moose annually for a ceremonial potlatch. While the Proposal was not adopted by the Board, the staff analysis noted that a harvest use area for moose at Kings Bay in Unit 6D was mapped in 1985 and 1986 and hunters expressed hope that they could hunt moose there again in the future (Stratton and Chisum 1986:82-84).

In 2014, the Board adopted Proposal WP14-10 establishing the customary and traditional use determination for moose in the Kings Bay drainage portion of Unit 7 for only the residents of Chenega Bay and Tatitlek, recognizing their traditional use of moose in this area. The Board also adopted Proposal WP14-11 with modification, allowing residents of only Chenega Bay and Tatitlek to harvest moose from the portion Unit 7 draining into Kings Bay while recognizing the conservation concern for moose in this area and maintaining the closed season.

Biological Background

Moose populations in most of Unit 6 were originally relocated from other areas of Alaska in the 1940's and 1950's, when they were released on the Copper River Delta in Unit 6C, and expanded mostly eastward in subsequent years (Crowley 2010). The only moose endemic to Unit 6D are a small population in the Lowe River drainage near Valdez, numbering about 40 animals, largely occurring on non-Federal lands (Crowley 2008).

No formal moose surveys have been conducted in Unit 6D, which encompasses Prince William Sound. Most of Unit 6D consists of habitat largely unsuitable for moose with deep fjords and mountainous shorelines. The vegetation is mostly forested with muskeg meadows and few areas of extensive willow browse. Snow depths can be extreme, especially in the western and northern portions of Prince William Sound.

The moose population segment that regularly provides some harvest opportunity within Unit 6D occurs within the Lowe River drainage in the north end of Unit 6D, near Valdez. The Lowe River area likely receives dispersing moose from adjacent Unit 13 to the north, and because of severe winters and often extreme snow depths, supports only a small resident moose population (Crowley 2008, Westing 2015, pers. comm.).

Unit 6C to the east of Unit 6D has a thriving moose population that originated from releases of orphaned moose calves in the 1940's and 50's. This population is currently at an all-time high and is the likely source of occasional reports of moose on Hawkins and Hinchinbrook Islands in Unit 6D.

The Kings Bay portion of Unit 7, on the western border of Unit 6D, has had a small moose population for many years. Some moose from the King's Bay population have undoubtedly strayed into Unit 6D. Narrow riparian areas along the Kings and Nellie Juan Rivers result in little moose habitat in the King's Bay area. Moose surveys conducted in this area have resulted in declining counts of 20 to 5 moose

between 1997 and 2006 (Zemke 2006). The USFS contracted ADF&G to conduct a moose survey of the King's Bay portion of Unit 7 in 2014, but no moose were observed (Westing 2015, pers. comm.).

Harvest History

An average of 2.5 moose /year have been harvested from Unit 6D since 1983. Of the 81 moose reported harvested from Unit 6D in this period, 89% had been taken from the Lowe River drainage near Valdez. Approximately 10% have come from the eastern portion of Unit 6D near Cordova; the majority of these coming from the far eastern end of Hinchinbrook Island. No recent harvest has been reported from the western portion of Unit 6D, or that area adjacent to the small moose population in the King's Bay portion of Unit 7 (Westing 2015, pers. comm.).

Effects of the Proposal

If this proposal is adopted it would establish a moose season in Unit 6D, from Sept. 1 to Dec 31 with a harvest limit of one bull moose. There is little moose habitat in Unit 6D and no viable moose populations. The portion of Unit 6D, which is adjacent to the Kings Bay area of Unit 7, is the closest area within Unit 6D to where the proponent lives, that might support a moose population. The most recent survey of that area revealed no moose or sign of moose in 2014. Likewise, the population that has been counted in the area prior to 2014 has been too low to support any harvest, and as a result, harvest has been closed in both State and Federal regulations. The extension of the moose season in Unit 6D could lead to the harvest of moose adjacent to the King's Bay portion of Unit 7 which would inhibit growth of this population.

The Lowe River drainage near Valdez does support a small moose harvest that averages 2.5 moose per year. Lengthening the Federal season in Unit 6D would add little opportunity for rural residents as Valdez is a non-rural community and little Federal land exists in the Lowe River drainage.

Likewise, some moose disperse from Unit 6C into eastern portions of Unit 6D. Most of the harvest that has come from this portion of Unit 6D has been on non-Federal lands on the eastern end of Hinchinbrook Island.

OSM PRELIMINARY CONCLUSION

Oppose Proposal WP16-10b. Do not establish a season or harvest limit for moose.

Justification

This proposal to establish a Federal open season for the harvest of one bull moose in Unit 6D would add little opportunity for rural residents of Unit 6D to harvest moose, as there are no viable moose populations in the unit. Liberalizing harvest opportunity for moose adjacent to the King's Bay portion of Unit 7 could set back recovery efforts of that population and few other opportunities to harvest moose in Unit 6D exist, particularly on Federal public lands. All Alaska residents may harvest any bull moose in Unit 6D from Sept. 1 through Sept. 30, under State hunting regulations.

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WP16–11 Executive Summary	
General Description	Proposal WP16–11 requests a buck–only season be established in Unit 6D with a season of Jan. 1 – Jan. 31, and a harvest limit of 1 buck. <i>Submitted by Andy McLaughlin of Chenega Bay.</i>
Proposed Regulation	<p>Unit 6—Deer</p> <p><i>4 deer; however antlerless deer may be taken Aug. 1–Dec. 31</i> <i>only from Oct. 1–Dec. 31.</i></p> <p>Unit 6D–1 buck. Jan. 1–Jan. 31</p>
OSM Preliminary Conclusion	Oppose
Southcentral Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None

**DRAFT STAFF ANALYSIS
WP16-11**

ISSUES

Proposal WP16-11, submitted by Andy McLaughlin of Chenega Bay, requests a buck-only season be established in Unit 6D with a season of Jan. 1 – Jan. 31, and a harvest limit of 1 buck.

DISCUSSION

The proponent believes that a buck hunt in Unit 6D should be allowed because many subsistence users have not been able to harvest enough deer to feed their families due to mild winters which decrease the hunter success rate. In addition, the proponent states that the deer population in Prince William Sound seems to be increasing after a severe decline during the winter of 2011/2012 and thus should be able to sustain additional harvest.

Existing Federal Regulation**Unit 6—Deer**

*4 deer; however, antlerless deer may be taken only
from Oct. 1–Dec. 31*

Aug. 1 – Dec. 31

Proposed Federal Regulation**Units 6—Deer**

4 deer; however antlerless deer may be taken only from Oct. 1–Dec. 31. Aug. 1–Dec. 31

Unit 6D—1 buck

Jan. 1–Jan. 31

Existing State Regulation**Unit 6 – Deer**

Residents—5 deer total

Bucks

Aug. 1–Sept. 30

Any deer

Oct.1–Dec. 31

Nonresidents—4 deer total

Bucks

Aug. 1–Sept. 30

Any deer

Oct. 1–Dec. 31

Extent of Federal Public Lands

Federal public lands comprise approximately 71% of Unit 6 and consist of 49.2% U.S. Forest Service managed lands, 13.8% Bureau of Land Management managed lands, and 7.6% National Park Service managed lands (See **Unit 6 Map**).

Customary and Traditional Use Determinations

The Federal Subsistence Board (Board) has not made a customary and traditional use determination for deer in Unit 6; therefore, all rural residents of Alaska may harvest deer in this Unit.

Regulatory History

In 1990, the Board adopted subsistence regulations for deer hunting. The initial Federal deer season was Aug. 1–Dec. 31 with a limit of 5 deer, but antlerless deer could only be taken from Sept. 15–Dec. 31.

In 1991, Proposal 118 was submitted by the Chugach National Forest, Forest Supervisor to reduce the harvest limit from 5 to 4 deer and shorten the antlerless deer season from Sept. 15–Dec. 31 to Nov. 1–Dec. 31 in Units 6C and 6D. The proposal was submitted due to concerns about a population decline following heavy snow years. The Board adopted the proposal with modification to extend the regulatory changes to all of Unit 6 to match recent changes to State regulations (OSM 1991).

In 1996, the Board adopted Proposal 21, which extended the antlerless season from Nov. 1–Dec. 31 to Oct. 1–Dec. 31 (OSM 1996).

The Alaska Department of Fish and Game (ADF&G) closed the deer season to residents and nonresidents on December 7, 2012 via Emergency Order. The closure was due to heavy snowfall that concentrated deer on and near beaches, which likely increased the population's vulnerability to harvest. The Copper River/Prince William Sound Fish and Game Advisory Committee (Advisory Committee) and ADF&G agreed the deer population in Unit 6 should be protected from overharvest following the winter of 2011/2012, when the population experienced an estimated overwinter mortality of 50%–70% (Westing 2014). The Advisory Committee recommended that both the State and Federal deer seasons be closed on December 7 and that the Cordova District Ranger be delegated the authority to close the season when there are conservation concerns (Copper River/Prince William Sound Fish and Game Advisory Committee, 2012).

In 2012, the Board approved Emergency Special Action (WSA12-10) shortening the antlerless deer season from Oct. 1–Dec. 31 to Oct. 1–Dec. 7 with modification (OSM 2012). The modification gave the Cordova District Ranger the ability to close the season for all hunting if further conservation concerns arose. Federally qualified subsistence users were still able to harvest antlered deer until December 31, 2012.

In 2013 the State issued an Emergency Order, to close the resident and nonresident antlerless deer season in Unit 6 at 11:59 p.m. on October 31, 2013. Subsequently the Board closed Federal public lands in Unit 6

(WSA13-07) to the harvest of antlerless deer by Federally qualified subsistence users, effective at 11:59 p.m. on Nov. 1, 2013 (OSM 2013). These actions were taken to reduce the hunting mortality of female deer and aid in population recovery following the severe winter of 2011/2012.

Biological Background

Sitka black-tailed deer were introduced to Unit 6 between 1916 and 1923 (Paul 2009). The deer population rapidly increased and expanded throughout Prince William Sound (Reynolds 1979). Deer are at the extreme northern limit of their range in Unit 6; however, the population has persisted due to the mild, maritime climate conditions in Prince William Sound (Shishido 1986 *referenced in* Crowley 2011).

Sitka black-tailed deer occupy a variety of habitats throughout the year, from low elevation forests and beaches to alpine habitats (Schoen and Kirchhoff 2007). Deer are more dispersed during summer, but snow depth restricts their winter distribution to lower elevations (Schoen and Kirchhoff 2007). The breeding season begins in late October and peaks in late November (Schoen and Kirchhoff 2007). Throughout the species' range, bucks generally shed their antlers between mid-December and mid-April (Anderson and Wallmo 1984), but in British Columbia most antlers were dropped between January and March (British Columbia Ministry of Environment, Lands and Parks 2000).

The deer population in Prince William Sound is limited by snow depth and duration. Heavy snow events have caused multiple major winter mortality events in the area (Reynolds 1979, Crowley 2011). Populations typically increase and then disperse after a series of mild winters, but decline following severe winters (Reynolds 1979, Crowley 2011). Deep snow and high harvest during the winter of 2011/2012 resulted in an estimated mortality of 50%–70% of the deer population in Prince William Sound (Westing 2014). Deep snow concentrates deer along beach fringes, which can be overgrazed if deer are forced to remain there for an extended period of time, and can result in starvation (Reynolds 1979). Deer are also more vulnerable to harvest while concentrated on the beaches, and harvesting under these circumstances could have a significant impact on the population. However, deep snow events concentrating deer on beaches during the hunting season are not common (Reynolds 1979, Crowley 2011). Predation is not considered a significant for deer in Prince William Sound (Reynolds 1979).

The State has set a population objective of 24,000–28,000 deer with an annual harvest of 2,200–3,000 deer in Unit 6; however, currently there are no means of estimating the abundance of deer in the unit (Crowley 2011, Westing 2013). Instead, ADF&G and the Chugach National Forest use deer-pellet surveys as an index of the relative density of deer. The mean number of deer pellet groups observed declined from 2010 to 2013 (**Figure 1**), consistent with a decline in deer density (Westing 2013). However, deer pellet surveys are not sensitive to previous years' winter mortality events, because deer deposit pellets through most of the winter until succumbing to starvation in the spring (Burcham 2013, pers. comm.; Crowley 2012, pers.

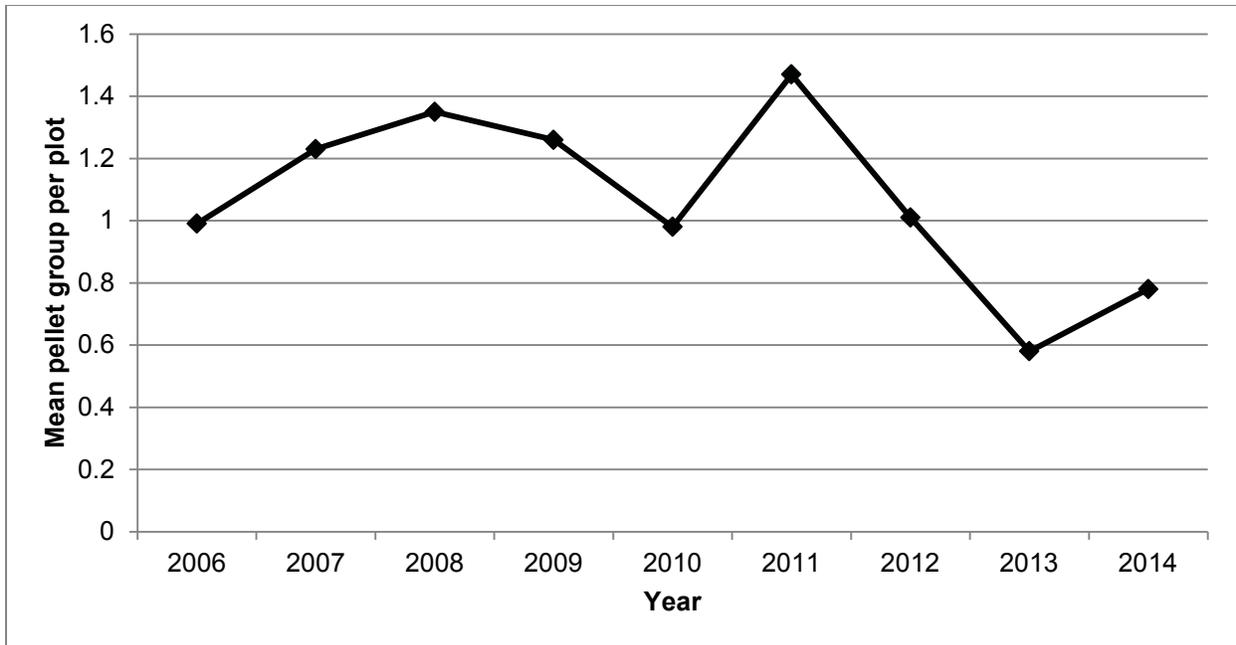


Figure 1. Deer pellet density observed along transects in Unit 6. Deer pellet density provides an index of the relative density of deer in the unit (Crowley 2011; Crowley 2012, pers. comm., Westing 2013, 2014, Westing 2015, pers. comm.).

comm.). Thus, there is a one year lag between mortality events and decrease in deer pellet density. Deer pellet counts conducted in 2012 and 2013 by ADF&G and the U.S. Forest Service corroborated the 50-70% mortality during the severe winter in 2011/2012 (Crowley 2011, Westing 2013). The 2012/2013 mean number of pellet groups per plot (0.58) was the lowest recorded by ADF&G since 1995 and represented a 61% decline from 2010/2011. Biologists also found evidence of the mortality event during the deer pellet surveys conducted in June 2012. Ten deer carcasses were encountered during transects, whereas zero or one are encountered during normal years (Burcham 2013, pers. comm.). Although differences in topography and snow retention among the islands can result in local variation in deer densities, declines in deer pellet densities were observed on all islands and in nearly every location during the 2013 survey (Figures 1-3 and Table 1, Westing 2013).

The mean number of pellet groups per plot in 2014 (0.78) increased slightly from 2013, but was still low suggesting the deer population still remains at relatively low levels despite two relatively mild winters (Westing 2014). The most recent deer pellet counts may have been influenced by a relatively warm winter which may have allowed the deer to remain dispersed at higher elevations, with fewer deer concentrated at lower elevations where pellet transects are conducted. No carcasses were found in 2013 and hunters reported that deer were in good condition (Westing 2014).

Harvest History

Deer are an important subsistence resource for residents of Unit 6. A community survey in 2003 showed that deer were used by more households in Chenega Bay, Cordova, and Tatitlek than any other large mammal species, with a minimum of 65% of households estimated using deer in each community (Table

1). In addition, deer were the primary large mammal harvested by households in each community, whereas other large mammal resources were more likely shared from individuals within or outside of the communities (Fall 2006) (**Table 1**). Moose and other large mammals are also an important source of food for the three communities. For example, despite the much higher number of deer than moose harvested by Cordova residents, the estimated amount of moose meat harvested (59,723 pounds) was higher than that of deer (58,501 pounds) in 2003 (Fall 2006). A large proportion of the yearly take of deer by the residents of Cordova, the largest of the three communities, occurs on Hawkins Island, which is in relatively close proximity to town.

Prior to 2011, deer harvest in Unit 6 was estimated from harvest questionnaires mailed to a sample of hunters who were issued State harvest tickets. It is difficult to identify deer harvested by Federally qualified subsistence users, as results are categorized by residents of Unit 6 (local residents), residents outside of Unit 6 (nonlocal residents), and nonresidents. Thus, the local and nonlocal resident categories include both Federally qualified subsistence users and non-Federally qualified subsistence users. However, beginning in 2011/2012, harvest reports were given to each user issued a State harvest ticket, which should improve reporting and relates each user to a community. The interim harvest report shows that approximately 45% of the reported resident harvest was by local Federally qualified subsistence users (residents of Cordova, Chenega Bay, Tatitlek, and Whittier), with 50% of the harvest by non-Federally qualified Alaska residents, and 5% by nonlocal Federally qualified subsistence users (ADF&G 2012). Approximately 98% of the reported harvest by local Federally qualified subsistence users was from Cordova residents (ADF&G 2012), which was similar to the results of the household survey conducted in 2003 (95% of reported harvest) (**Table 1**). The majority of harvest by non-Federally qualified subsistence users was from Anchorage residents (approximately 38% of reported harvest), and 5% of the reported harvest was associated with Valdez residents, which is a nonrural community in Unit 6 (ADF&G 2012). Local and nonlocal residents were the primary users (79%–97% of the estimated hunters) and accounted for 82%–98% of the estimated harvest between 2006/2007 and 2010/2011 (**Table 2**). Local residents of Unit 6, including Valdez residents, represented an estimated 24% to 30% of deer hunters in Unit 6 between 2006/2007 and 2010/2011, but accounted for 35% to 54% of the reported harvest (**Table 2**). McLaughlin (2015) reported a decline in hunter success during the winter of 2014-2015. This may be due in part to the relatively warm winter which allows the deer to remain more dispersed at higher elevations where they are less available to the Federally qualified subsistence users (Westing 2014).

From 2006 to 2012, the sex ratio of the harvest was approximately 62% male and 38% female (Crowley 2011, Westing 2013). Harvest reports between 2005/2006 and 2009/2010 showed that the majority of the annual deer harvest occurred during October (19%–35%), November (25%–35%), and December (18%–24%) (Crowley 2011, Westing 2013). Harvest chronology is similar to previous years, as users often prefer hunting after snow has pushed the deer to lower elevations and because the rut, which occurs in November, increases the harvest vulnerability of bucks (Crowley 2011, Westing 2013). Deer were primarily harvested by hunters using boats (76%–86%) as their primary transportation method (Crowley 2011, Westing 2013).

Table 1. Household harvest survey data from communities in Prince William Sound, Alaska in 2003. Households were classified as having used, attempted to harvest, or harvested resources if any member of that household participated in that category. The percentage of households that used a resource included those that harvested and gave it away, acquired the resource from another user, and included all non-commercial uses of the resource (Fall 2006).

Community	Species	Percentage (%) of households			Total animals harvested
		Used	Attempted	Harvested	
Chenega Bay	Deer	81	75	56	50
	Moose	44	6	6	1
	Goat	25	13	6	1
	Sheep	13	6	0	0
	Black bear	13	0	0	0
Cordova	Deer	65	44	39	1354
	Moose	51	14	12	111
	Goat	11	3	1	16
	Sheep	1	1	1	8
	Black bear	10	8	3	35
Tatitlek	Deer	100	56	28	30
	Moose	32	0	0	0
	Goat	40	12	4	1
	Sheep	4	0	0	0
	Black bear	20	8	4	1

Table 2. Unit 6 deer harvest 2006-2010 (Crowley 2012, pers. comm., Westing 2013, 2014, OSM 2015, Westing 2015, pers. comm.). Harvest data was recorded via the State's deer hunter questionnaire survey until 2010/2011 and via a harvest ticket starting in 2011/2012 (Westing 2015, pers. comm.).

Year	Local resident		Nonlocal resident		Nonresident	
	Hunters	Deer harvested	Hunters	Deer harvested	Hunters	Deer harvested
2006/2007	451	992	1145	825	42	31
2007/2008	356	468	842	569	312	231
2008/2009	420	662	1114	1164	68	62
2009/2010	355	607	851	945	83	29
2010/2011	352	805	775	778	60	29
2011/2012 ^a	456	1207	909	1486	49	47
2012/2013	196	154	616	370	50	13
2013/2014	205	222	515	346	38	3

^a Harvest data recorded via harvest ticket

Effects of the Proposal

If this proposal is adopted it would establish a buck season in January in Unit 6D. This new season would provide increased opportunity for Federally qualified subsistence users to harvest deer during the winter.

Although the deer population in Unit 6 seems to be increasing, it remains low and has not reached full recovery or management objectives. This proposed regulation change, if it applied to only the village of Chenega Bay, would have little effect on the deer population in Unit 6. However, since this proposal would include a longer season for the much larger population of Cordova, it does have the potential to slow deer recovery. In January many bucks have dropped their antlers thus making it more difficult to identify them. The population is mostly limited by snow depth, but an increased harvest of does could slow the population recovery. Current regulations allow the harvest of does until Dec. 31, so there isn't too much of a concern. Relatively mild winters during the past three years, which have been good for the deer, may have contributed to the slight decline in the hunter success because the deer more dispersed and remained at less accessible higher elevations.

OSM PRELIMINARY CONCLUSION

Oppose Proposal WP16-11.

Justification

Adding a buck season in January has the potential take of does and slowing the recovery of the deer population in Prince William Sound from the severe decline in 2011/2012. The likelihood of taking does increases during January as many of the bucks have dropped their antlers. There are currently ample opportunities for residents to harvest deer under both the State and Federal regulations. Maintaining the current harvest season is recommended until the deer population fully recovers.

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WP16–12 Executive Summary	
General Description	Proposal WP16–12, requests an increase in the harvest limit for deer in Unit 6 from 4 to 5. <i>Submitted by Milo Burcham, Cordova Ranger District, Chugach National Forest.</i>
Proposed Regulation	Unit 6—Deer <i>54-deer; however antlerless deer may be taken only Aug. 1–Dec. 31 from Oct. 1–Dec. 31.</i>
OSM Preliminary Conclusion	Support
Southcentral Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None.

**DRAFT STAFF ANALYSIS
WP16-12**

ISSUES

Proposal WP16-12, submitted by Milo Burcham, Cordova Ranger District, Chugach National Forest requests an increase in the harvest limit for deer in Unit 6 from 4 to 5.

DISCUSSION

The proponent states that increasing the harvest limit from 4 to 5 deer in Unit 6 will reduce regulatory complexity for Federally qualified subsistence users. Additionally, the proponent believes that the lower Federal harvest limit has not resulted in decreased opportunity because rural residents have been able to harvest up to 5 deer under State regulations.

Proposal 16-11 requesting a buck only season in Unit 6D from Jan. 1-Jan. 31 with a limit of 1 buck was also submitted for this regulatory cycle.

Existing Federal Regulation

Unit 6—Deer

<i>4 deer; however, antlerless deer may be taken only from Oct. 1-Dec. 31</i>	<i>Aug. 1 – Dec. 31</i>
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Proposed Federal Regulation

Unit 6—Deer

<i>5-4 deer; however antlerless deer may be taken only from Oct. 1-Dec. 31.</i>	<i>Aug. 1-Dec. 31</i>
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Existing State Regulation

Unit 6 – Deer

<i>Residents—5 deer total</i>	<i>Bucks</i>	<i>Aug. 1–Sept. 30</i>
	<i>Any deer</i>	<i>Oct.1–Dec. 31</i>
<i>Nonresidents—4 deer total</i>	<i>Bucks</i>	<i>Aug. 1–Sept. 30</i>
	<i>Any deer</i>	<i>Oct. 1–Dec. 31</i>

Extent of Federal Public Lands

Federal public lands comprise approximately 71% of Unit 6 and consist of 49.2% U.S. Forest Service managed lands, 13.8% Bureau of Land Management managed lands, and 7.6% National Park Service managed lands (See **Unit 6 Map**).

Customary and Traditional Use Determinations

The Federal Subsistence Board (Board) has not made a customary and traditional use determination for deer in Unit 6; therefore, all rural residents of Alaska may harvest deer in this Unit.

Regulatory History

In 1990, the Board adopted subsistence regulations for deer hunting in Unit 6. The initial Federal deer season was Aug. 1–Dec. 31 with a limit of 5 deer, but antlerless deer could only be taken from Sept. 15–Dec. 31.

In 1991, Proposal 118 was submitted by the Chugach National Forest, Forest Supervisor to reduce the harvest limit from 5 to 4 deer and shorten the antlerless deer season from Sept. 15–Dec. 31 to Nov. 1–Dec. 31 in Units 6C and 6D. The proposal was submitted due to concerns of population declines following heavy snow years. The Board adopted the proposal with modification to extend the regulatory changes to all of Unit 6 to match recent changes to State regulations (OSM 1991).

In 1996, the Board adopted Proposal 21, which extended the antlerless season from Nov. 1–Dec. 31 to Oct. 1–Dec. 31 in Unit 6 to increase opportunity for Federally qualified subsistence users (OSM 1996).

In 2008 the Board adopted Proposals WP08–08 and WP08–09 to allow for the take of 5 additional deer in Unit 6D by Chenega and Tatitlik to be used during annual memorial event at Old Chenega village site and during Cultural Heritage Week, respectively (OSM 2008a, 2008b).

The State closed the deer season to residents and nonresidents on Dec. 7, 2012 via Emergency Order. The closure was due to heavy snowfall that concentrated deer on and near beaches, which likely increased the population's vulnerability to harvest. The Copper River/Prince William Sound Fish and Game Advisory Committee (Advisory Committee) and Alaska Department of Fish and Game (ADF&G) agreed the deer population in Unit 6 should be protected from overharvest following the winter of 2011/2012, when the population experienced an estimated overwinter mortality of 50%–70% (Westing 2013). The Advisory Committee recommended that both the State and Federal deer seasons be closed on December 7 and that the Cordova District Ranger be delegated the authority to close the season when there are conservation concerns (Copper River/Prince William Sound Fish and Game Advisory Committee, 2012).

In 2012, the Board approved Emergency Special Action WSA12-10 which shortened the antlerless deer season from Oct. 1–Dec. 31 to Oct. 1–Dec. 7 with modification (OSM 2012). The modification gave the Cordova District Ranger the ability to close the season if further conservation concerns arose. Federally qualified subsistence users were still able to harvest antlered deer until December 31, 2012.

In 2013 the State issued an Emergency Order to close the resident and nonresident antlerless season in Unit 6 at 11:59 p.m. on October 31, 2013. Subsequently, the Board closed Federal public lands in Unit 6 (WSA13-07) to the harvest of antlerless deer by Federally qualified subsistence users, effective at 11:59 p.m. on Nov. 1, 2013 (OSM 2013). Both these actions were taken to reduce hunting mortality of female deer and aid in population recovery following the severe winter of 2011/2012.

The Cordova District Ranger of the Chugach National Forest has delegated authority to set Federal subsistence harvest quotas, close, reopen or adjust seasons and adjust harvest and possession limits for moose and deer, to include the sex that may be harvested in Unit 6. In addition, the Cordova District Ranger may close Federal public lands to the take of moose and deer by all users.

Biological Background

Sitka black-tailed deer were introduced to Unit 6 between 1916 and 1923 (Paul 2009). The deer population rapidly increased and expanded throughout Prince William Sound (Reynolds 1979). Deer are at the extreme northern limit of their range in Unit 6; however, the population has persisted due to the mild, maritime climate conditions in Prince William Sound (Shishido 1986 *referenced in* Crowley 2011).

Sitka black-tailed deer occupy a variety of habitats throughout the year, from low elevation forests and beaches to alpine habitats (Schoen and Kirchhoff 2007). Deer are more dispersed during summer, but snow depth restricts their winter distribution to lower elevations (Schoen and Kirchhoff 2007). The breeding season begins in late October and peaks in late November (Schoen and Kirchhoff 2007). Throughout the species' range, bucks generally shed their antlers between mid-December and mid-April (Anderson and Wallmo 1984), but in British Columbia most antlers were dropped between January and March (British Columbia Ministry of Environment, Lands and Parks 2000).

The deer population in Prince William Sound is limited by snow depth and duration. Heavy snow events have caused multiple major winter mortality events in the area (Reynolds 1979, Crowley 2011). Populations typically increase and then disperse after a series of mild winters, but decline following severe winters (Reynolds 1979, Crowley 2011). Deep snow and high harvest during the winter of 2011/2012 resulted in an estimated mortality of 50%–70% of the deer population in Prince William Sound (Westing 2013, Westing 2015, pers. comm.). Deep snow concentrates deer along beach fringes, which can be overgrazed if deer are forced to remain there for an extended period of time, and can result in starvation (Reynolds 1979). Deer are also more vulnerable to harvest while concentrated on the beaches, and harvesting under these circumstances could have a significant impact on the population. For example, the high harvest during 2011/2012 coincided with the severe winter conditions (Westing 2015, pers. comm.) However, deep snow events concentrating deer on beaches during the hunting season are not common (Reynolds 1979, Crowley 2011). Predation is not considered significant for deer in Prince William Sound (Reynolds 1979).

The State has set a population objective of 24,000–28,000 deer with an annual harvest of 2,200–3,000 deer in Unit 6; however, currently there are no means of estimating the abundance of deer in the unit (Crowley 2011, Westing 2013). Instead, ADF&G and the Chugach National Forest use deer-pellet surveys as an index of the relative density of deer. The mean number of deer pellet groups observed declined from 2010 to

2013 (**Figure 1**), consistent with a decline in deer density (Westing 2013). However, deer pellet surveys are not sensitive to previous years' winter mortality events, because deer deposit pellets through most of the winter until succumbing to starvation in the spring (Burcham 2013, pers. comm.; Crowley 2012, pers. comm.). Thus, there is a one year lag between mortality events and decrease in deer pellet density. Deer

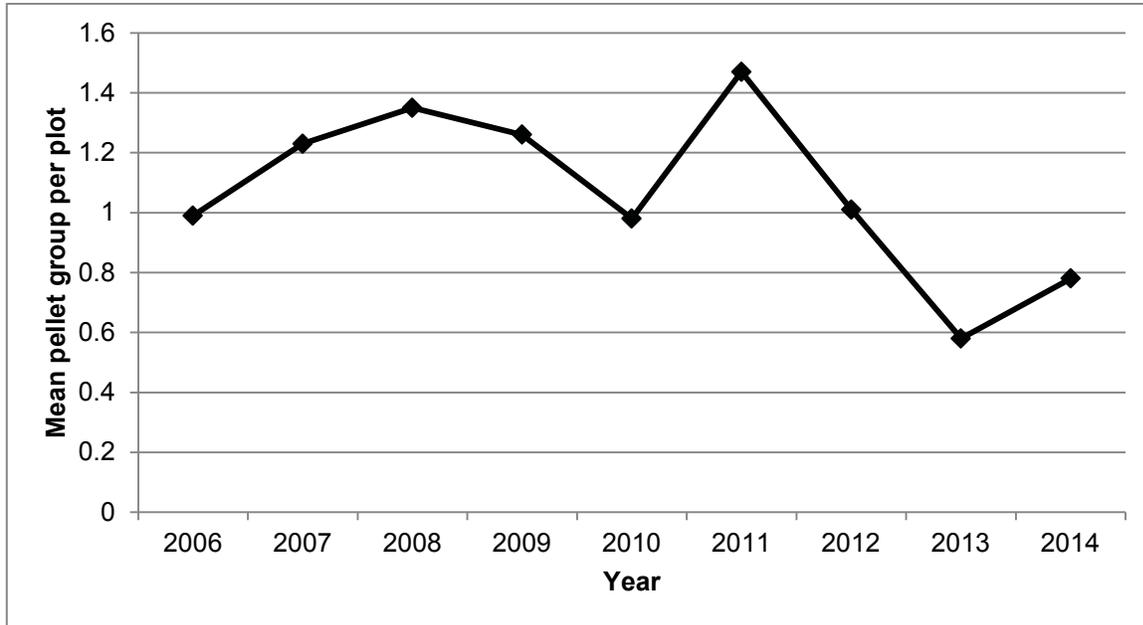


Figure 1. Deer pellet density observed along transects in Unit 6. Deer pellet density provides an index of the relative density of deer in the unit (Crowley 2011; Crowley 2012, pers. comm., Westing 2013, 2014, Westing pers. comm. 2015).

pellet counts conducted in 2012 and 2013 by ADF&G and the U.S. Forest Service corroborated the 50-70% mortality during the severe winter in 2011/2012 (Crowley 2011, Westing 2013). The 2012/2013 mean number of pellet groups per plot (0.58) was the lowest on recorded by ADF&G since 1995 and represented a 61% decline from 2010/2011. Biologists also found evidence of the mortality event during the deer pellet surveys conducted in June 2012. Ten deer carcasses were encountered during transects, whereas zero or one are encountered during normal years (Burcham 2013, pers. comm.). Although differences in topography and snow retention among the islands can result in local variation in deer densities, declines in deer pellet densities were observed on all islands and in nearly every location during the 2013 survey (Figures 1-3 and Table 1, Westing 2013).

The mean number of pellet groups per plot in 2014 (0.78) increased slightly from 2013, but was still low suggesting the deer population still remains at relatively low levels despite two relatively mild winters (Westing 2014). The most recent deer pellet counts may have been influenced by a relatively warm winter which may have allowed the deer to remain dispersed at higher elevations, with fewer deer concentrated at lower elevations where pellet transects are conducted. No carcasses were found in 2013 and hunters reported that deer were in good condition (Westing 2014).

Harvest History

Deer are an important subsistence resource for residents of Unit 6. A community survey in 2003 showed that deer were used by more households in Chenega Bay, Cordova, and Tatitlek than any other large mammal species, with a minimum of 65% of households estimated using deer in each community (**Table 1**). In addition, deer were the primary large mammal harvested by households in each community, whereas other large mammal resources were more likely shared from individuals within or outside of the communities (Fall 2006) (**Table 1**). Moose and other large mammals are also an important source of food for the three communities. For example, despite the much higher number of deer than moose harvested by Cordova residents, the estimated amount of moose meat harvested (59,723 pounds) was higher than that of deer (58,501 pounds) in 2003 (Fall 2006). A large proportion of the yearly take of deer by the residents of Cordova, the largest of the three communities, occurs on Hawkins Island, which is in relatively close proximity to town.

Prior to 2011, deer harvest in Unit 6 was estimated from harvest questionnaires mailed to a sample of hunters who were issued State harvest tickets. It is difficult to identify deer harvested by Federally qualified subsistence users, as results are categorized by residents of Unit 6 (local residents), residents outside of Unit 6 (nonlocal residents), and nonresidents. Thus, the local and nonlocal resident categories include both Federally qualified subsistence users and non-Federally qualified subsistence users. However, beginning in 2011/2012, harvest reports were given to each user issued a State harvest ticket, which should improve reporting and relates each user to a community. The interim harvest report shows that approximately 45% of the reported resident harvest was by local Federally qualified subsistence users (residents of Cordova, Chenega Bay, Tatitlek, and Whittier), with 50% of the harvest by non-Federally qualified Alaska residents, and 5% by nonlocal Federally qualified subsistence users (ADF&G 2012). Approximately 98% of the reported harvest by local Federally qualified subsistence users was by Cordova residents (ADF&G 2012), which was similar to the results of the household survey conducted in 2003 (95% of reported harvest) (**Table 1**). The majority of harvest by non-Federally qualified subsistence users was by Anchorage residents (approximately 38% of reported harvest), and 5% of the reported harvest was associated with Valdez residents, which is a nonrural community in Unit 6 (ADF&G 2012). Local and nonlocal residents were the primary users (79%–97% of the estimated hunters) and accounted for 82%–98% of the estimated harvest between 2006/2007 and 2013/2014 (**Table 2**). Local residents of Unit 6, including Valdez residents, represented an estimated 24% to 30% of deer hunters in Unit 6 between 2006/2007 and 2010/2011, but accounted for 35% to 54% of the reported harvest (**Table 2**). In most years, rural residents are able to harvest up to 5 deer under the State regulations (Burcham 2015, pers. comm.).

From 2006 to 2012, the sex ratio of the harvest was approximately 62% male and 38% female (Crowley 2011, Westing 2013). Harvest reports between 2005/2006 and 2009/2010 showed that the majority of the annual deer harvest occurred during October (19%–35%), November (25%–35%), and December (18%–24%) (Crowley 2011, Westing 2013). Harvest chronology is similar to previous years, as users often prefer hunting after snow has moved deer to lower elevations and because the rut, which occurs in

November, increases the harvest vulnerability of bucks (Crowley 2011, Westing 2013). Deer were primarily harvested by hunters using boats (76%–86%) as their primary transportation method (Crowley 2011, Westing 2013).

Table 1. Household harvest survey data from communities in Prince William Sound, Alaska in 2003. Households were classified as having used, attempted to harvest, or harvested resources if any member of that household participated in that category. The percentage of households that used a resource included those that harvested and gave it away, acquired the resource from another user, and included all non-commercial uses of the resource (Fall 2006).

Community	Species	Percentage (%) of households			Total animals harvested
		Used	Attempted	Harvested	
Chenega Bay	Deer	81	75	56	50
	Moose	44	6	6	1
	Goat	25	13	6	1
	Sheep	13	6	0	0
	Black bear	13	0	0	0
Cordova	Deer	65	44	39	1354
	Moose	51	14	12	111
	Goat	11	3	1	16
	Sheep	1	1	1	8
	Black bear	10	8	3	35
Tatitlek	Deer	100	56	28	30
	Moose	32	0	0	0
	Goat	40	12	4	1
	Sheep	4	0	0	0
	Black bear	20	8	4	1

Table 2. Unit 6 deer harvest 2006-2010 (Crowley 2012, pers. comm., Westing 2013, OSM 2015, Westing 2015, pers. comm.). Harvest data was recorded via the State’s deer hunter questionnaire survey until 2010/2011 and via harvest ticket beginning in 2011/2012 (Westing 2015, pers. comm.).

Year	Local resident		Nonlocal resident		Nonresident	
	Hunters	Deer harvested	Hunters	Deer harvested	Hunters	Deer harvested
2006/2007	451	992	1145	825	42	31
2007/2008	356	468	842	569	312	231
2008/2009	420	662	1114	1164	68	62
2009/2010	355	607	851	945	83	29
2010/2011	352	805	775	778	60	29
2011/2012 ^a	455	1207	909	1486	49	47
2012/2013	196	154	616	370	50	13
2013/2014	205	222	515	346	38	3

^a Harvest data recorded via harvest ticket.

Effects of the Proposal

If this proposal is adopted, it would change the Federal harvest limit from 4 to 5 deer in Unit 6, providing additional harvest opportunity for Federally qualified subsistence users under Federal regulations. This proposal could reduce regulatory complexity for the Federally qualified subsistence users if special actions are implemented in times of shortage, as well as simplify monitoring and enforcement of regulations for Federal and State managers.

Although the deer population in Unit 6 seems to be increasing, it remains low and has not reached full recovery. Increasing the harvest limit from 4 to 5 is not expected to negatively affect the population as resident hunters, who constitute the vast majority of users, are already allowed 5 deer under State regulations.

OSM PRELIMINARY CONCLUSION

Support Proposal WP16–12.

Justification

It is desirable to reduce regulatory complexity for rural subsistence users when possible by paralleling Federal regulations with State regulations for the harvest of wildlife, so long as it does not contradict the

mandates and objectives of Title VIII of ANILCA. In this case, modifying the Federal harvest limit from 4 to a 5 deer in Unit 6 to parallel State regulations will reduce regulatory complexity for Federally qualified subsistence users on Federal public lands. The proposed change is not expected to have an adverse effect on the deer population which, although low, is increasing at this time even when most resident hunters are taking up to 5 deer under the State regulations. .

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WP16–13 Executive Summary	
General Description	Proposal WP16–13 requests that Federally qualified rural residents be required to obtain a Federal registration permit to harvest black bears in Unit 6D from Sept. 10 through June 30. <i>Submitted by Andy McLaughlin of Chenega Bay.</i>
Proposed Regulation	<p>Units 6—Black bear</p> <p><i>1 bear. In Unit 6D a Federal registration permit is required to harvest black bear from June 11 Sept. 10 to June 30 (FR0608). Sept. 1 – June 30</i></p>
OSM Preliminary Conclusion	<p>Support with modification to require a Federal registration permit during the entire season.</p> <p>The modified regulation should read:</p> <p><i>1 bear. In Unit 6D a Federal registration permit is required to harvest black bear from June 11 Sept. 1 to June 30 (FR0608). Sept. 1 – June 30</i></p>
Southcentral Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None

**STAFF ANALYSIS
WP16-13**

ISSUES

Proposal WP16-13, submitted by Andy McLaughlin of Chenega Bay, Alaska, requests that Federally qualified rural residents be required to obtain a Federal registration permit to harvest black bears in Unit 6D from Sept. 10 through June 30.

DISCUSSION

The proponent believes that rural residents should not have to utilize State harvest tickets/registration permits to harvest a quota of 20 black bears allowed for harvest by qualified rural residents between Sept. 10 to June 10 and would prefer to utilize the Federal registration permit for most of the Federal subsistence season for black bear in Unit 6D.

Existing Federal Regulation

Unit 6—Black Bear

Unit 6—1 bear. In Unit 6D a Federal registration permit is required to harvest black bear from June 11 to June 30 Sept. 1 – June 30

(iii) Unit-specific regulations

(A) You may use bait to hunt black bear between April 15 and June 15. In addition, you may use bait in Unit 6D between June 16 and June 30. The harvest quota in Unit 6D is 20 bears taken with bait between June 16 and June 30.

Proposed Federal Regulation

Unit 6—Black Bear

*Unit 6—1 bear. In Unit 6D a Federal registration permit is required to harvest black bear from ~~June 11~~ **Sept. 10** to June 30 (FR0608)* Sept. 1 – June 30

(iii) Unit-specific regulations

(A) You may use bait to hunt black bear between April 15 and June 15. In addition, you may use bait in Unit 6D between June 16 and June 30. The harvest

quota in Unit 6D is 20 bears taken with bait between June 16 and June 30.

Existing State Regulation

Unit 6—Black Bear

*Unit 6D — One bear by permit**

Sept. 10 –Jun. 10

*** In February 2015, the BOG adopted Proposal 210 to change the black bear hunt in Unit 6D to a registration hunt. This new regulation became effective July 1, 2015.**

Extent of Federal Public Lands

Federal public lands, managed almost entirely by the U.S. Forest Service (USFS), comprise approximately 67% of Unit 6D.

Customary and Traditional Use Determinations

Rural residents of Yakutat and Units 6C and 6D, (excluding residents of Whittier) have a positive customary and traditional use determination for black bear in Unit 6A. Rural residents of Units 6C and 6D (excluding residents of Whittier) have a positive customary and traditional use determination for black bear in Unit 6 remainder.

Regulatory History

In 1990, the Federal Subsistence Board (Board) adopted interim subsistence regulations for black bear hunting at bait stations that aligned with State regulations. The Federal and State bear baiting season in Units 6A, 6B, and 6C has been from Apr. 15 – June 15 and since 2005 – 2006 the season in Unit 6D has been Apr. 15– June 10.

The Alaska Board of Game (BOG) has taken several incremental measures to reduce black bear harvest in Unit 6D over the past 15 years. In 2003, Unit 6D was closed to the shooting of black bears from a boat. Completing a bear baiting clinic to establish a bear bait station was required in 2005. Also in 2005, the BOG changed the season dates for Unit 6D from Sept. 1 – June 30 to Sept. 1 – June 10 to reduce harvest of black bears. Beginning in regulatory year 2009/2010 the start of the Unit 6D black bear season was changed from Sept. 1 to Sept. 10 to further reduce harvest. The intent of shifting the start of the season 10 days later was to reduce the harvest of black bears as they move from salmon streams to the high country during the fall. Also in 2009 the BOG approved the use of a harvest reporting system for Unit 6 to better track hunting effort for black bears.

In 2014, the Board adopted Proposal WP14-09 with modification to require the use of a Federal subsistence registration permit for hunting black bears in Unit 6D from June 11 – June 30, and setting a quota of 20 black bears to be taken over bait during the extended Federal baiting season. Requiring the use of a

Federal registration permit was seen as a way to better track harvest of black bears at a time when there was a growing conservation concern for the species.

Current Events Involving the Species

In February 2015, the BOG adopted Proposal 210 to change the black bear hunt in Unit 6D to a registration hunt. The BOG concluded that bears in the area were being overharvested and that a better management tool was needed to assess and control harvest. This new regulation became effective July 1, 2015.

On February 27, 2015, the Alaska Department of Fish and Game (ADF&G) issued an Emergency Order closing the State black bear season in Unit 6D, effective May 27, 2015. This was in response to a steady decline in the black bear population, a tripling of the harvest between the 1990s and 2007, along with a marked decrease in harvest in 2012 and 2013. In addition, the percentage of females in the harvest has exceeded management goals since 2006.

Additionally, on May 19, 2015 wildlife special action request WSA15-09, submitted by ADF&G was received, requesting that the Federal subsistence black bear season close on May 27, the same effective date as the Emergency Order issued by the State. They also requested that the Federal Unit 6D black bear permit required from June 11 through June 30 be extended to begin on May 27 so that Federal subsistence users are in compliance with both State and Federal permit requirements. This special action request was unanimously approved by the Board with modification, temporarily extending the dates of the Unit 6D Federal subsistence black bear permit from May 27, 2015 through June 30, 2015.

Biological Background

Black bears are common throughout Unit 6 with the exception of Kayak and Middleton Islands along the North Gulf Coast of Alaska (NGC) and Montague, Hinchinbrook, Hawkins and several smaller islands in Prince William Sound (Crowley 2011). The State management goal for black bear in Unit 6 is to maintain a black bear population that will sustain a 3-year average annual harvest of 200 bears composed of at least 75% males with a minimum average skull size of 17 inches (Crowley 2011). The proportion of females taken exceeded the recommended management objective of 25% in 2006, 2007, and 2009 (Crowley 2011).

Black bear densities tend to be highest in western Prince William Sound (Unit 6D) and lowest along the NGC and eastern Prince William Sound (Units 6A, 6B, and 6C) (McIlroy 1970; Modafferi 1978, 1982). Density estimates in good habitat in Prince William Sound range between 0.4 to 10 bears/km² (McIlroy 1970; Modafferi 1978, 1982) and the overall density in Unit 6D which is in the most productive black bear habitat in Unit 6, from 2004 – 2006 was 0.59 bears/km² (range 0.33– 0.85 bears/km²) (Crowley 2008). Modafferi (1982) found that male black bears in Unit 6D tended to move to beaches after emerging from winter dens to feed on new grasses and sedges, whereas females concentrated on south facing slopes and avalanche chutes. Black bear populations in Unit 6 fluctuate due to the severity of winter weather, food abundance, hunting pressure (McIlroy 1970, Schwartz et al. 1986) and in some areas, competition with and predation by brown bears.

Harvest monitoring and assessment has been the primary method used to assess the status of the black bear population in Unit 6. In 2009, the BOG approved the use of a harvest reporting system that incorporated an assessment of effort in addition to the harvest (Crowley 2011). Since the late 1980s ADF&G has been using the skull size as a biological objective because it is thought that these changes may indicate changes in population size, harvest composition, and the sustainability of harvest levels. A decreasing skull size may indicate a decline in older bears in the population which may be indicative of a population decline (Lowell 2011). To assess the population age structure, which is a measure of population health, skull size and harvest densities are compared between 8 geographic areas corresponding to well-defined watersheds within Unit 6 (Crowley 2011). The decline in skull size of male black bears, along with high annual harvest during the most recent 5-year period (2005–2009), when compared to the previous two 5-year periods, suggests that harvest may be impacting the age structure of the black bear population. A similar trend was not found for female harvested bears.

Harvest History

Historical and ethnographic accounts of the Alutiiq of Prince William Sound and the Eyak Indians of the Copper River Delta, the traditional inhabitants of the Chugach, indicate that black bears were an important subsistence food source (Simeone 2008). Although black bears were once a major subsistence staple for residents in Prince William Sound communities, Sitka Black-tailed deer have replaced black bears in importance according to local residents (Simeone 2008). Between 1986 and 2006, residents of Unit 6, resident hunters living outside of Unit 6, and nonresidents accounted for 11%, 58%, and 31% of the black bear harvest in Unit 6, respectively. A majority of the harvest (85%) occurred in Unit 6D (Simeone 2008). From 2005 – 2010, the hunting pressure and take of black bears in Unit 6 was greatest in Unit 6D (83–86%), which coincides with the greatest densities of black bears and ease of access by Anchorage hunters through the Anton Anderson Memorial Tunnel (Whittier Tunnel) (Simeone 2008, Crowley 2011). An average of 427 black bears were taken per regulatory year between 2004 and 2013 (**Table 1**), which far exceeds the recently stated management goal to average 200 black bears over a 3-year period.

Table 1. Black Bear harvest in Unit 6D from 2004-2013 (Westing 2015, pers. comm.).

Year	Chenega Bay	Cordova	Tatitlek	Total by Rural Residents	Total 6D Harvest	% Harvest by Rural Residents
2004					318	0.00%
2005		3	1	4	417	0.96%
2006		5	1	6	481	1.25%
2007	1	1		2	570	0.35%
2008	1	1		2	538	0.37%
2009	1	2		3	481	0.62%
2010	1			1	453	0.22%
2011	3	3	1	7	467	1.50%
2012	2			2	358	0.56%
2013	1	1	1	3	185	1.62%

However, without accurate population estimates it is difficult to determine if current harvest levels are sustainable. Although it is difficult to determine the status of black bear populations using harvest data (Garshelis 1993), the decrease in age of harvested bears during the high harvest from 2005 – 2009 suggests that the harvest may be having a population level effect (reducing the overall size of the population) (Crowley 2011). More compelling is the sharp drop in total Unit 6D harvest during 2012 and 2013, the most recent regulatory years for which data is available (**Table 1**)

Additionally, the number of bears taken over bait almost doubled during the 5 year period between 2005 and 2011 (50 to 96) (**Table 2**).

Table 2 Black Bear harvest over bait in Unit 6A, 6B, 6C, and 6D from 2005-2011 (Westing 2015, pers. comm.).

Year	Unit 6A	Unit 6B	Unit 6C	Unit 6D	Total
2005/2006	12	0	4	34	50
2006/2007	8	0	4	54	66
2007/2008	11	0	4	61	76
2008/2009	13	0	4	54	71
2009/2010	21	0	9	67	97
2010/2011	17	0	8	67	92
2011/2012	0	0	7	33	40

The total reported harvest of black bears taken in Unit 6D, by Federally qualified rural residents, from 2009 to 2013 was 16 (Westing 2015). The low harvest of black bears taken over bait in 2011 – 2012 was due in part to heavy snowfall and late spring melt; however, harvest has continued to decline in the in the last 2 years in which the snowmelt was exceptionally early (Westing 2015, pers. comm.). The percentage of black bears taken over bait in Unit 6 ranged from 6.9% to 15.0% between 2005 and 2011.

Effects of the Proposal

If adopted, this proposal would require Federally qualified subsistence users to obtain a Federal subsistence registration permit to hunt black bear in Unit 6D between September 10 and June 30. Currently, the Federal permit is required only from June 11 through June 30. With conservation concerns for the black bear population in Unit 6D, changes in State hunting season dates are likely in coming years, as has happened with the Emergency Order closure of the black bear season on May 27, 2015. This regulation change would not change the Federal subsistence hunting season or harvest limit for black bear in Unit 6D and would not have any negative effect on the black bear population in Unit 6D.

Qualified rural residents would be required to obtain a Federal registration permit to harvest a black bear under Federal regulations. This proposal would simplify the reporting requirements for Federal users.

OSM PRELIMINARY CONCLUSION

Support Proposal WP16-13 **with modification** to require a Federal registration permit during the entire season.

The modified proposal should read:

Unit 6—Black Bear

In Unit 6D a Federal registration permit is required to harvest black bear from ~~Sept. 10~~ to June 30 (FR0608)

(iii) Unit-specific regulations

(A) You may use bait to hunt black bear between April 15 and June 15. In addition, you may use bait in Unit 6D between June 16 and June 30. The harvest quota in Unit 6D is 20 bears taken with bait between June 16 and June 30.

Justification

Requiring a Federal registration permit for the entire Federal season would simplify and consolidate reporting requirements for Federally qualified rural residents so that they would not have to report hunting effort or harvest to different management agencies for different portions of the open season. The proponent, Andy McLaughlin of Chenega Bay, approved of this modification to the proposal.

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WP16–14 Executive Summary	
General Description	Proposal WP16–14 requests extending the Federal mountain goat season in Unit 6D from Aug.20–Jan. 31 to Aug. 20–Feb. 28. <i>Submitted by Andy McLaughlin of Chenega Bay.</i>
Proposed Regulation	<p>Unit 6D—Mountain goat</p> <p><i>Unit 6D (subareas RG242, RG243, RG244, RG245, RG249, RG266, and RG252 only) – 1 goat by Aug. 20 – Feb. 28 Jan. 31</i></p> <p><i>Federal registration permit only. In each of the Unit 6D subareas, goat seasons will be closed by the Cordova District Ranger when harvest limits for that subarea are reached. Harvest quotas are as follows: RG242 – 2 goat, RG243 – 4 goats, RG244 and RG245 combined – 2 goats, RG249 – 4 goats, RG266 – 4 goats, RG252 – 1 goat.</i></p>
OSM Preliminary Conclusion	Support
Southcentral Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None

**DRAFT STAFF ANALYSIS
WP16-14**

ISSUES

Proposal WP16-14, submitted by Andy McLaughlin, requests extending the Federal mountain goat season in Unit 6D from Aug. 20–Jan. 31 to Aug. 20–Feb. 28.

DISCUSSION

The proponent requests extension of the Federal season for mountain goats in Unit 6D due to the lack of snow and rough seas, which makes hunting areas inaccessible to Federally qualified subsistence users. Mountain goats have remained at higher elevations during mild winters when there is little snowfall. In years with normal to heavy snowfall, mountain goats typically move down to lower elevations where they are more available for harvest.

Existing Federal Regulation

Unit 6D—Mountain goat

Unit 6D (subareas RG242, RG243, RG244, RG245, RG249, RG266, and RG252 only) – 1 goat by Federal registration permit only. In each of the Unit 6D subareas, goat seasons will be closed by the Cordova District Ranger when harvest limits for that subarea are reached. Harvest quotas are as follows: RG242 – 2 goat, RG243 – 4 goats, RG244 and RG245 combined – 2 goats, RG249 – 4 goats, RG266 – 4 goats, RG252 – 1 goat. Aug. 20 – Jan. 31

Proposed Federal Regulation

Unit 6D—Mountain goat

Unit 6D (subareas RG242, RG243, RG244, RG245, RG249, RG266, and RG252 only) – 1 goat by Federal registration permit only. In each of the Unit 6D subareas, goat seasons will be closed by the Cordova District Ranger when harvest limits for that subarea are reached. Harvest quotas are as follows: RG242 – 2 goat, RG243 – 4 goats, RG244 and RG245 combined – 2 goats, RG249 – 4 goats, RG266 – 4 Aug. 20 – **Feb. 28**
~~Jan. 31~~

goats, RG252 – 1 goat.

Existing State Regulation

Unit 6D—Mountain goat

Residents and Nonresidents: One goat by permit available online at <http://hunt.alaska.gov> or in person in Anchorage, Cordova, Fairbanks, Glennallen, Palmer, or Soldotna beginning Aug 6 RG242- Sept. 15 – Jan. 31
RG266

One goat by permit available in Cordova beginning Sept 18 RG248 *may be announced*

Extent of Federal Public Lands

Federal public lands comprise approximately 67% of Unit 6D and consist of 64.8% U.S. Forest Service managed lands and 1.8% Bureau of Land Management managed lands (**See Unit 6 Map**).

Customary and Traditional Use Determinations

Rural residents of Units 6C and 6D have a customary and traditional use determination to harvest mountain goats in Units 6C and 6D.

Regulatory History

Mountain goats in Unit 6D were managed solely by State until 1990. Long seasons with bag limits of 1 or 2 goats were in effect from statehood through 1975. The bag limit was reduced to one goat in 1976, and the first permit hunt was established in 1980. By 1986, the present system of registration hunts began (Crowley 2010). Management guidelines were clarified in 1993 when a harvest tracking strategy was fully implemented (Caughley 1977, Smith 1984). Implementation of the strategy provided the framework necessary to guide harvest decisions, such as setting harvest quotas for subareas within hunt units.

Federal subsistence management of mountain goats in Unit 6D began in 1990 with a Special Action approved by the Federal Subsistence Board (Board) (Crowley 2006). Hunting was open to 1 goat by Federal registration permit and restricted to subareas 822 (now RG242), 823 (now RG243), 824 (now RG244), 828 (now RG245), and 879 (now RG252) (**Map 1**). Federal public lands in 823 (now RG243) and 824 (now RG244) were closed to non-Federally qualified users. The Federal subsistence season would close when the harvest level for each subarea was reached.

The Board passed modified Proposal P92-026 in 1992, which added subareas 829 (now RG249) and 830 (now RG266), and removed the public land closures in 823 (now RG243) and 824 (now RG244) (FWS 1992).

The Board adopted Proposal P93-33 in 1993, closing the Federal subsistence goat season in 828 (now

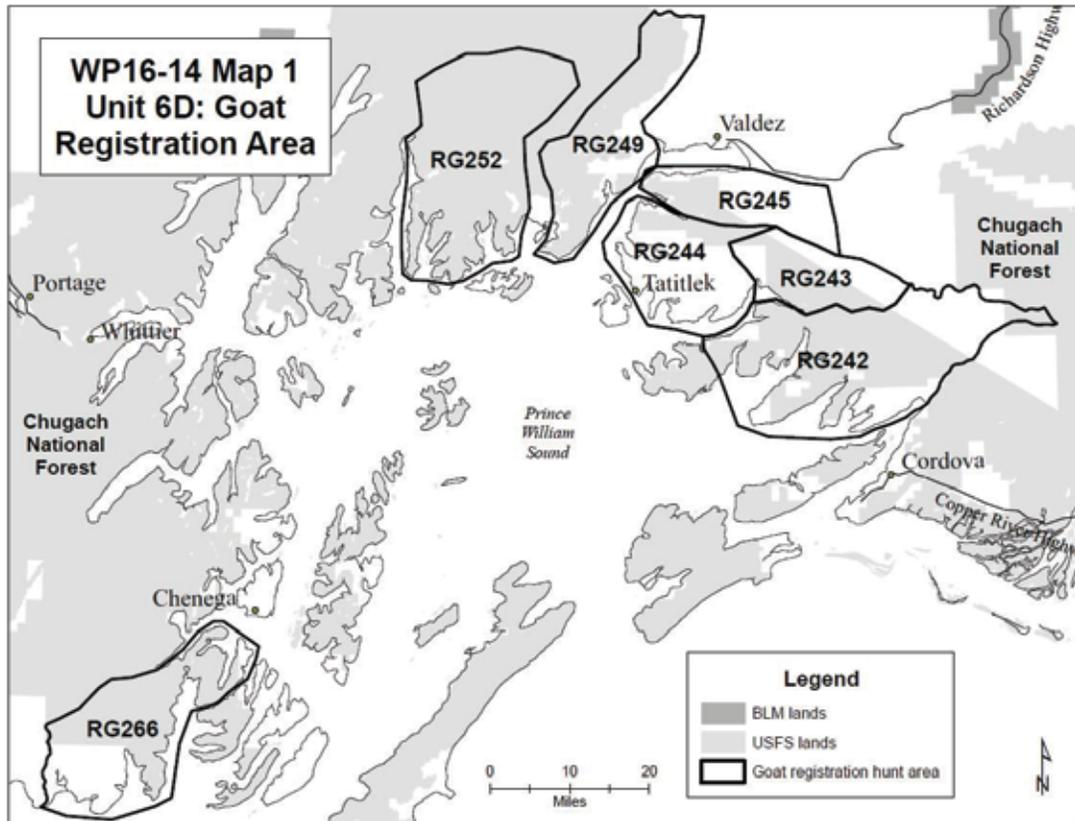
RG245) and closing Federal public lands to non-Federally qualified subsistence users in the same subarea. In order to facilitate the closure of the season when harvest limits were met, the Board also established a harvest quotas for each of the subareas, resulting in a total harvest limit of 13 goats available exclusively to Federally qualified subsistence users within Unit 6D (FWS 1993).

In 1995, the Board adopted Proposal P95-12, closing the Federal goat season in RG243 due to conservation concerns, and reducing the total goat harvest limit in Unit 6D to 11 goats (FWS 1995).

In response to increasing mountain goat populations, the Board adopted Proposal P00-14 in 2000, lifting the closure in RG243 for Federally qualified users, and establishing larger harvest quotas in subareas RG243 and RG249, resulting in the current Federal subsistence harvest quota of 17 goats in Unit 6D (FWS 2000).

The Board adopted Proposal WP06-13 in 2006, opening Federal public lands within RG245 to non-Federally qualified users (FWS 2006) in response to increase in the goat populations within subarea RG245.

In 2014, the Board adopted WP14-06, which combined the harvest quota of 2 goats between subareas RG244 and RG245 (FWS 2014). Although the proponent requested the closing the Federal mountain goat season in Unit 6D subarea RG244, where little Federal public land exists, and open subarea RG245, the Board decided to retain RG244 because land in RG244 are closer to the Village of Tatitlek.



Biological Background

Mountain goats are endemic to the mainland in Unit 6 and to Bainbridge, Culross, and Knight Islands (Crowley 2010). Mountain goat populations in Unit 6 have fluctuated widely over the past 60 years. Populations in Unit 6D were reduced in Port Wells in the 1940's and Puget Bay in the 1950's by military personnel stationed in Whittier and Seward, respectively (Nowlin 1996, Crowley 2006).

Nowlin (1996), using count areas established by Griese (1988a), established a tracking harvest strategy which: 1) improved aerial surveys to obtain trend information; 2) established registration hunts to monitor distribution and harvest; and 3) developed a minimum population objective of 2,400 goats for Unit 6. Mountain goat populations and harvest have been actively monitored by Alaska Department of the Fish and Game (ADF&G) since the early 1970s (Reynolds 1981, Crowley 2012). Populations remained low in the 1970s and 1980s due to hunter harvest (Griese 1988a), predation (Griese 1988b) and as a result of significant natural mortality during severe winters in 1971 and 1975 (Crowley 2010). By 1987, the estimated population in Unit 6 declined to 3,400 goats and subsequently to 3,000 goats by 1994. In response to declining populations and low recruitment, harvest was reduced and hunting of small groups of goats (<60) was prohibited during the early to mid-1990's (Nowlin 1996). As a result of these conservation measures the population rebounded to approximately 4,000 goats by 1999 and has remained between 3,800 and 4,200 goats.

Harvest History

Although mountain goats are distributed throughout Unit 6, the greatest numbers occur in Unit 6D. An average of 50 mountain goats were harvested per year between 2005-2013 from Unit 6D, which is about 2% of the population (based on the population estimates available from 2005–2010) and approximately 70% of the total annual harvest in Unit 6 (Crowley 2012) (**Table 1**). Although the State sets harvest rates for specific hunts at 3-5%, some areas receive very little hunting pressure. Local residents from Unit 6D harvest approximately 3% of the mountain goats annually, compared to nonlocal residents, who account for approximately 43% of harvest (**Table 1**). A majority of the mountain goats harvested (2006-2013) were taken in September and October (Crowley 2012, Westing 2015). In Tatitlek and Chenega Bay, goat hunting is considered a subsistence activity and is well integrated into the local culture. In these villages there is prestige associated with a successful goat hunt, and the meat is widely shared in a systematic manner (Simeone 2008).

Table 1. Mountain goat harvest, residency, and population estimates in Unit 6D, 2005/2006 to 2013/2014 (Crowley 2006, 2010, 2012, Westing 2015, OSM 2015).

Regulatory Year	M	F	Unk	Total	Local Resident (%) ^a	Nonlocal Resident (%)	Nonresident (%)	Population Estimate
2005/2006	48	9	1	58	2 (3)	25 (43)	31 (53)	2476
2006/2007	35	13	0	48	3 (6)	18 (38)	27 (56)	2479

2007/2008	42	9	1	52	1 (2)	27 (52)	24 (46)	2479
2008/2009	31	8	2	41	3 (7)	14 (34)	24 (59)	2411
2009/2010	40	11	2	53	0	25 (47)	28 (53)	–
2010/2011	39	9	0	48	2 (4)	22 (46)	24 (50)	2228
2011/2012	49	11	0	60	5 (8)	25 (42)	30 (50)	
2012/2013	29	9	1	39	0	16 (41)	23 (59)	
2013/2014	41	9	0	50	0	20 (40)	30 (60)	
Mean	39	10	1	50	2 (3)	21 (43)	27 (54)	

^a Local means residents of Unit 6D from Cordova, Tatitlek, Chenega Bay, and Main Bay Hatchery

Effects of the Proposal

If this proposal is adopted, it would add 28 days to the Federal harvest season for mountain goats in Unit 6D, which would increase the hunting opportunity for Federally qualified subsistence users. Since the historic harvest by local residents in Unit 6D (**Table 1**) is small, the effect on mountain goat populations from an extended harvest season by local residents is also likely to be minimal. Assuming accurate reporting of the total harvest the number of goats taken should not exceed the small Federal quota.

OSM PRELIMINARY CONCLUSION

Support Proposal WP16-14.

Justification

Adopting this proposal would provide more opportunity for Federally qualified subsistence users to harvest mountain goats. It is unlikely that an overharvest of the mountain goat population will occur given that there is quota and the likelihood of many mountain goats being taken in February is small.

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WP16–15 Executive Summary	
General Description	Proposal WP16-15 increases the harvest quota for caribou in a portion of Unit 7 from five caribou to ten caribou with five animals for the community of Hope and five for the community of Cooper Landing by Federal registration permit. <i>Submitted by the Hope Village Council.</i>
Proposed Regulation	<p><i>Unit 7- Caribou</i></p> <p><i>Unit 7 – north of the Sterling Highway and west of the Seward Highway – 1 caribou by Federal registration permit only. The Seward District Ranger will close the Federal season when 5 caribou are harvested by Federal registration permit. Hope subsistence users and 5 caribou are harvested from Cooper Landing subsistence users by Federal registration permit.</i></p> <p><i>Unit 7- remainder</i></p> <p><i>No Federal open season</i></p>
OSM Preliminary Conclusion	Support with modification to close Federal lands to the harvest of caribou to allow the Kenai Mountains Caribou Herd to rebuild.
Southcentral Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public	None

WP16–15 Executive Summary	
Comments	

**DRAFT STAFF ANALYSIS
WP16-15**

Issues

Proposal WP16-15, submitted by the Hope Village Council, requests that the harvest quota for caribou in a portion of Unit 7 be increased from five caribou to ten caribou with five animals for the community of Hope and five for the community of Cooper Landing by Federal registration permit.

Discussion

The proponent states that a group of Federally qualified subsistence users from Cooper Landing harvested the entire Federal subsistence quota of caribou on the first day of the 2014 season, eliminating any opportunity for Federally qualified subsistence users from Hope to harvest caribou. The proponent believes the regulation should be changed to assure that Federally qualified subsistence users in both Hope and Cooper Landing have an equal opportunity to harvest caribou.

Existing Federal Regulation

Unit 7- Caribou

<i>Unit 7 – north of the Sterling Highway and west of the Seward Highway – 1 caribou by Federal registration permit only. The Seward District Ranger will close the Federal season when 5 caribou are harvested by Federal registration permit.</i>	<i>Aug. 10 – Dec. 31</i>
<i>Unit 7 remainder</i>	<i>No Federal open season</i>

Proposed Federal Regulation

Unit 7- Caribou

<i>Unit 7 – north of the Sterling Highway and west of the Seward Highway – 1 caribou by Federal registration permit only. The Seward District Ranger will close the Federal season when 5 caribou are harvested by Federal registration permit. Hope subsistence users and 5 caribou are harvested from Cooper Landing subsistence users by Federal registration permit.</i>	<i>Aug. 10 – Dec. 31</i>
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Unit 7 remainder

No Federal open season

Existing State Regulation

Unit 7 – Caribou

<i>Unit 7 – north of the Sterling Highway and west of the Seward highway</i>	<i>Residents and Nonresidents: one caribou by permit</i>	<i>DC001</i>	<i>Aug. 10 – Dec. 31</i>
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Unit 7 remainder

No open season

Other Applicable Federal Regulations

This proposal calls for the allocation of a limited caribou resource between two different communities. Alaska National Interest Lands Conservation Act (ANILCA) Sec. 804 specifies that:

“...Whenever is necessary to restrict the taking of populations of fish and wildlife on such lands for subsistence uses in order to protect the continued viability of such populations, or to continue such uses, such priority shall be implemented through appropriate limitations based on the application of the following criteria:

- 1. Customary and direct dependence upon the population as a mainstay of livelihood;*
- 2. local residency; and*
- 3. the availability of alternative resources.”*

Extent of Federal Public Lands

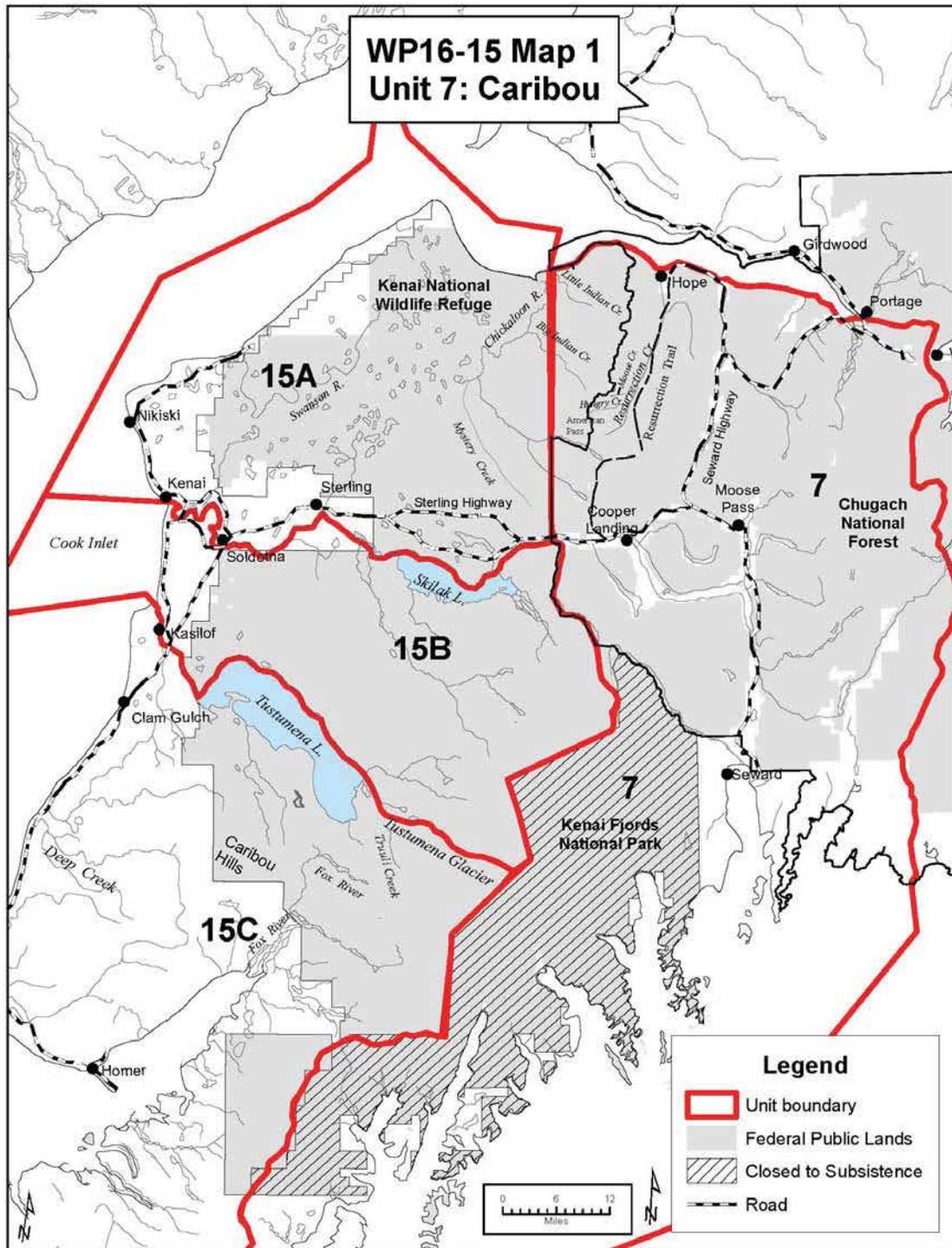
Federal public lands comprise approximately 78% of Unit 7 and consists of 50% U.S. Forest Service (USFS) managed lands, 23% National Park Service (NPS) managed lands and 5% U.S. Fish and Wildlife Service (USFWS) managed lands (**Map 1**).

Customary and Traditional Use Determination

Residents of Cooper Landing and Hope have a customary and traditional use determination to harvest caribou in Unit 7.

Regulatory History

There has been a State hunting season for the Unit 7 caribou since 1972. Between 1972 and 1976, the Alaska Department of Fish and Game (ADF&G) issued an unlimited number of registration



permits, and the season was closed by emergency order when the caribou harvest exceeded sustainable limits. Since 1977, ADF&G has managed the Kenai Mountains Caribou Herd using a limited drawing permit system (McDonough 2011). ADF&G issued between 249 and 261 drawing permits per year for one caribou of either sex between 1996 and 2013 (ADF&G et al. 2003, ADF&G 2015). In addition, the Safari Club International auctioned off a Kenai Mountains

caribou permit in 2013 for the State of Alaska- Governor's Permit for Wildlife Conservation. In 2014, the State reduced the number to 50 drawing permits (Burcham 2015, pers. comm.). In 2015, 25 State drawing permits were issued for the Kenai Mountains Caribou Herd (ADF&G 2015).

In 2010, the Federal Subsistence Board (Board) adopted Proposal WP10-32a, which established a customary and traditional use determination for caribou in Unit 7 for the communities of Hope and Sunrise. Only Hope is specified in regulation as having a customary and traditional use determination because Sunrise is considered a "subcommunity" of Hope (Matuskowitz 2015, pers. comm.). Board action on Proposal WP10-32b, established a Federal subsistence hunting season of Aug. 10 to Dec. 31 with a harvest quota of 5 caribou.

In 2014, the Board adopted Proposal WP14-08 which added the community of Cooper Landing to the customary and traditional use determination for caribou in Unit 7.

The State has required successful drawing permit hunters to report within 10 days of harvest, and unsuccessful hunters to report within 15 days of the season end (ADF&G 2009). Based on 2014 registration permit stipulations, Federally qualified subsistence users are required to call in to report within 48 hours and send in their permit cards within 20 days.

Biological Background

Caribou were extirpated on the Kenai Peninsula by 1912 or 1913 (Lutz 1956, Spencer and Hakala 1964). Caribou transplants were later conducted on the Kenai Peninsula by ADF&G with funds provided by the Federal Aid in Wildlife Restoration Act, 16 U.S.C. §669-669i (Burriss and McKnight 1973). In 1965, 15 animals (3 bulls and 12 cows) from the Nelchina Caribou Herd were released at Chickaloon River and Mystery Creek (Burriss and McKnight 1973; ADF&G et al. 1994). In 1966, 29 more Nelchina caribou (3 bulls and 26 cows) were released near Sterling (Burriss and McKnight 1973; ADF&G et al. 1994). Some of the caribou from one or both of these releases migrated to the high country to colonize the northern portion of the Kenai Mountains in Unit 7, while others colonized a portion of the lowlands in Unit 15A.

ADF&G has flown aerial surveys in fixed-winged aircraft to determine the number, distribution, and composition of the Kenai Mountains Caribou Herd. This herd grew to 339 animals in 1975 (Selinger 2005). Hunters reduced the population to 193 caribou by 1977 (Selinger 2003). The pre-hunting season herd population estimates in 1985 and 1988 were 434 and 305 caribou, respectively (Selinger 2003). The herd's population estimate ranged from 500-120 caribou from 1995 to 2014 (**Figure 1**). The State management objective for the Kenai Mountains Caribou Herd is to maintain a post-hunt population of 300-400 animals, due to limited winter range (McDonough 2011). The calf:cow ratio ranged from 20-34:100 between 1985 and 1996 (Selinger 2003; ADF&G et al. 1994). During this same period, the bull:cow ratio ranged from 37-44:100 (Selinger 2005; ADF&G et al. 1994). Ten-month old calf weights for Kenai Mountains caribou

decreasing each year from 1996-2002, but they were generally above the weights of calves from the Nelchina Caribou Herd (McDonough 2011).

Kenai Mountains Caribou Herd population estimates have declined over the last decade. The population estimates have been below ADF&G's management objective since 2011. Based on the most recent population estimates (late fall 2013 and early winter of 2014), the Kenai Peninsula Caribou Herd is at the lowest number it has been since just after reintroduction 50 years ago.

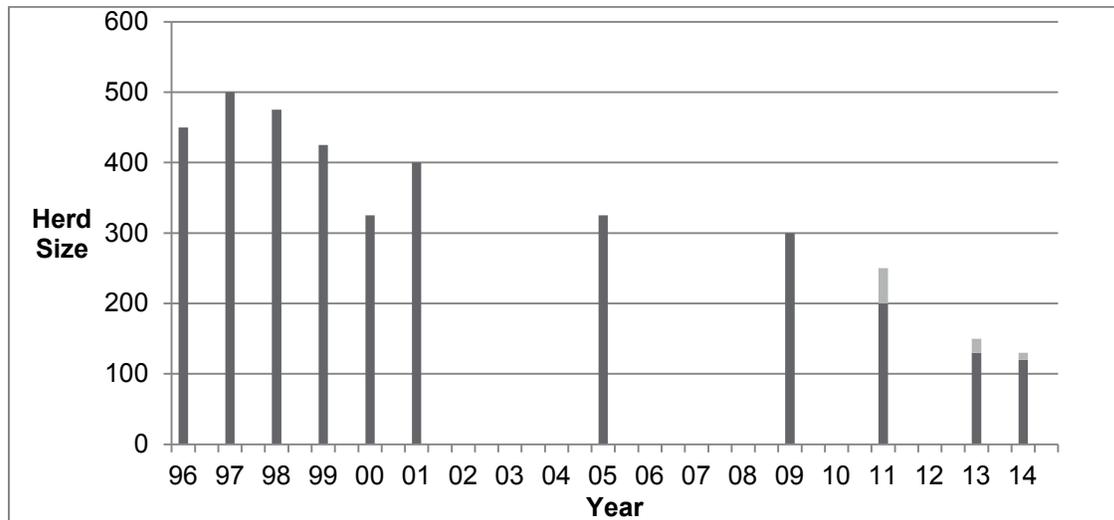


Figure 1. Kenai Mountains Caribou Herd population estimates 1996-2014 (Selinger 2003 and 2005; McDonough 2007; Selinger 2015, pers. comm.). Gray coloration on bars for 2011-2014 is ADF&G's estimated population ranges.

Harvest rates vary for other Alaska caribou herds. Lenart (2011) reported an annual harvest rate of <2% for the Central Arctic Caribou Herd. For the Chisana Caribou Herd, the recommended harvest strategy is- bulls only and not to exceed 2% of the estimated population (Chisana Caribou Herd Working Group 2012). Caikoski (2011) reported an annual harvest rate of <2% for the Porcupine Caribou Herd. The reported harvest rates were 2-3% for the Delta Caribou Herd (Seaton 2009) and 3% for the White Mountains Caribou Herd (Seaton 2011). Harvest rates for the Fortymile Caribou Herd were set at 2-3% from 2012-2018, with a 4% harvest if that herd reaches 70,000 animals (Harvest Management Coalition 2012). Dau (2011) reported a harvest rate of 3-4% for the Western Arctic Caribou Herd during the 2009-2010 timeframe. Parrett (2011) reported a harvest rate of 4-5% for the Teshekpuk Caribou Herd. Woolington (2009) reported that during the 1980s and 1990s, the Mulchatna Caribou Herd harvest rate was sustained at <5%. Tobey and Schwanke (2009) reported that ADF&G had maintained a harvest rate of approximately 7% for the Nelchina Caribou Herd.

Habitat

The Kenai Mountains Caribou Herd occupies mostly alpine tundra habitat between elevations of approximately 2,000 to 4,500 feet (ADF&G et al. 1994). This herd exhibits strong fidelity to

approximately 205 mi² of winter range habitat on the south-facing, windblown ridges of that portion of the Kenai Mountains bordered by American Pass on the south, Little Indian Creek on the north, Big Indian Creek on the west, and Resurrection Creek on the east (**Map 1**) (Selinger 2003; ADF&G et al. 1994). The calving grounds extend from American Pass to the headwaters of Big Indian Creek, including the headwaters of American, Hungry and Moose creeks (**Map 1**) (ADF&G et al. 1994). In summer, the herd expands its range to include areas east and south of Resurrection Creek to the Seward and Sterling highways; the summer range is approximately 560 mi² (Selinger 2003; ADF&G et al. 1994). The herd occupies habitat which is managed almost exclusively by the Chugach National Forest and Kenai National Wildlife Refuge. Selinger (2015, pers. comm.) observed that poor habitat and predation may be contributing to the current decline of the Kenai Mountains Caribou Herd.

Harvest History

Caribou were harvested by Kenai Peninsula rural residents over 100 years ago prior to when the original Kenai Peninsula caribou population was extirpated (OSM 2010). With reintroduction of caribou to the Kenai Peninsula 50 years ago, caribou harvest has occurred on the Kenai Mountains Caribou Herd since 1972.

In regulatory years 1993/94 to 2013/14, the reported State harvest of Kenai Mountains Caribou Herd was 17-29 animals/year (**Table 1**) (ADF&G 2015). During those years, most people that received a State drawing permit did not hunt, and only 12% of those who received a State drawing permit harvested a caribou. Hunters normally get to the Kenai Mountains Caribou Herd via long backpacking trips off the Resurrection Trail. Some hunters also access the herd via horse back. Motor vehicle use on this trail is prohibited in fall, reducing the number of people who hunt, as well as the harvest success rate. From regulatory years 1999/00 to 2005/06, 91% of the harvest occurred in August and September (Selinger 2003 and 2005; McDonough 2007).

The past two years, ADF&G has reduced the number of drawing permits. In 2014, the State reduced the number of drawing permits by 80% (from 250 to 50), with only 3 animals harvested in fall 2014 by these hunters (Burcham 2015, pers. comm.). In 2015, the State further reduced the number of permits and issued 25 drawing permits for the Kenai Mountains Caribou Herd (ADF&G 2015). Both Alaska residents and non-residents may apply for these State drawing permits.

Regulatory Year	Reported Harvest					
	Males	(%)	Females	(%)	Unknown.	Total
1993/94	19	66%	10	33%	0	29
1994/95	17	61%	11	39%	0	28
1995/96	10	56%	8	44%	0	18

1996/97	10	43%	13	57%	0	23
1997/98	12	44%	14	52%	1	27
1998/99	17	68%	8	32%	0	25
1999/00	11	46%	13	54%	0	24
2000/01	15	68%	7	32%	0	22
2001/02	13	68%	6	32%	0	19
2002/03	11	61%	8	39%	0	18
2003/04	14	64%	7	32%	1	22
2004/05	10	59%	7	41%	0	17
2005/06	16	76%	5	24%	0	21
2006/07	10	59%	7	41%	0	17
2007/08	9	47%	9	47%	1	19
2008/09	15	79%	4	21%	0	19
2009/10	13	72%	5	28%	0	18
2010/11	13	68%	6	32%	0	19
2011/12	21	81%	5	19%	0	26
2012/13	12	50%	12	50%	0	24
2013/14	13	68%	6	32%	0	19

Under Federal subsistence regulations, rural residents from Hope harvested two caribou in regulatory year 2010/11 and two caribou in 2012/13. There was no reported Federal harvest in either regulatory year 2011/12 or 2013/14. In regulatory year 2014/15, four animals were harvested under Federal Subsistence regulations. Given that the Federal quota was 5 caribou and in anticipation of some harvest not yet being reported, the Federal season was closed August 13, 2014 by the USFS Seward District Ranger (Stovall 2015, pers. comm.). The final regulatory year 2014/15 reported harvest for the Unit 7 Federal subsistence hunt stands at 4 caribou (OSM 2015). The Federal subsistence hunt has taken a total of 8 caribou from the Kenai Mountains Caribou Herd since the hunt was established in 2010.

The average annual harvest by State drawing permit during the 8-year period from regulatory years 2001/02 to 2008/09 was 19 caribou per year (ADF&G 2009). The average annual harvest from State and Federal hunts combined during the 5-year period from regulatory year 2010/11 to 2013/14 was 23.2 caribou per year (ADF&G 2015, OSM 2015). For regulatory year 2014/15, the State drawing permit harvest was 3 caribou (Burcham 2015, pers. comm.) and the Federal subsistence harvest was 4 caribou (OSM 2015).

Other Alternatives Considered

One alternative considered was to recommend that Federal lands remain open to non-Federally qualified subsistence users while authorizing the U.S. Forest Service, Seward District Ranger to

issue Federal drawing permits (applicants from both Hope and Cooper Landing) and to set the annual harvest quota for a Federal hunt. ANILA Sec. 802 specifies that:

“...subsistence uses of fish and wildlife...shall be given preference on the public lands over other consumptive uses...”

Similarly, ANILCA Section 804 specifies that:

“...subsistence uses shall be accorded priority over taking on such lands of fish and wildlife for other purposes.”

OSM did not pursue this option, because of the present severe conservation concerns for the Kenai Mountains Caribou Herd.

A second alternative considered was to recommend closing Federal Lands to non-Federally qualified users and reducing the harvest limit for Federally qualified users with a possible bulls only restriction. This alternative was not pursued because of the severe conservation concerns for the Kenai Mountains Caribou Herd.

Effects of the Proposal

If this proposal is adopted, it would double the Unit 7 Federal subsistence harvest quota from five to ten caribou and would allocate the caribou resource equally between the communities of Hope and Cooper Landing. In a regulatory year, the season would close for the communities of Hope and Cooper Landing when each community harvested five caribou. This does not include harvest by State users, who harvested an average of 20.1 caribou during the 8-year period from regulatory years 2006/07 to 2013/14 but only 3 caribou in the 2014/15 hunting season. Adopting the proposal as submitted would allow State harvest to continue, while increasing Federal harvest. Given the most recent caribou population estimates, proposal WP16-15 would adversely impact conservation of the Kenai Mountains Caribou Herd.

Residents of Hope and Cooper Landing have a customary and traditional use determination for caribou in Unit 7. The populations of these two communities are not of equal size and there are other differences that would need to be addressed under ANILCA section 804 requirements.

The State of Alaska’s management objective for the Kenai Mountains Caribou Herd is to maintain a post-hunt population of 300-400 animals (McDonough 2011). This herd has declined dramatically over the past decade, and the most recent population estimate was only 120-130 animals (Selinger 2015, pers. comm.). At the current population level, there are severe conservation concerns.

OSM PRELIMINARY CONCLUSION:

Support Proposal WP16-15 **with modification** to close caribou hunting on Federal lands to allow the Kenai Mountains Caribou Herd to rebuild.

The modified regulation should read:

Unit 7 – Caribou

No Federal open season

~~Unit 7—north of the Sterling Highway and west of the Seward Highway—1 caribou by Federal registration permit only. The Seward District Ranger will close the Federal season when 5 caribou are harvested by Federal registration permit.~~

Federal lands are closed to the harvest of caribou.

Justification

Whether or not a closure should be implemented is governed by the Board’s *Policy on Closures to hunting, trapping and Fishing on Federal Public Lands in Alaska* (Aug. 29, 2007). Based on this policy, “When necessary for the conservation of healthy populations of fish and wildlife or to continue subsistence uses of such populations, the Federal Subsistence Board is authorized to restrict or to close the taking of fish and wildlife by subsistence and non-subsistence users on Federal public lands and waters (ANILCA Sections 804 and 815(3))... When a fish or wildlife population is insufficient to sustain any use, all uses must be prohibited.”

Closure of this hunt is justified for conservation of a healthy population of a wildlife species. Virtually all of the hunting area for the Kenai Mountains Caribou Herd is on Federal public land (Chugach National Forest and Kenai National Wildlife Refuge) and most of the harvest occurs on Chugach National Forest lands. The State management objective for the Kenai Mountains Caribou Herd is to maintain a post-hunt population of 300-400 animals, but the herd has remained below this level since 2011. The most recent populations estimate was only 120-130 animals. The Kenai Mountains Caribou Herd is currently at the lowest number it has been since just after reintroduced 50 years ago. Given the decline in the Kenai Mountains Caribou Herd, this population needs some time to recover. A closure would be rescinded when this caribou population rebuilds. Based on this Board policy, “...closers are periodically re-evaluated to determine whether the circumstances necessitating an original closure still exist and warrant continuation of the restrictions. When a closure is no longer needed, actions to remove it will be initiated as soon as practicable.”

WP16-15 and the current Kenai Mountains Caribou Herd population estimate (120-130 animals) were discussed with Mr. Jim Skogstad, President of the Hope Village Council by phone on July 7, 2015. Given the very low caribou population, he agreed that the hunt should be closed to allow the caribou herd to rebuild (Skogstad 2015, pers. comm.).

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WP16–16 Executive Summary	
General Description	Proposal WP16–16 requests that Federal public lands within the Paxson Closed Area in Unit 13 be closed to hunting big game by Federally qualified subsistence users. <i>Submitted by Paxson Fish and Game Advisory Committee.</i>
Proposed Regulation	<p>Unit 13</p> <p><i>___ .26(n)(v) In the following areas, the taking of wildlife for subsistence uses is prohibited or restricted on public lands:</i></p> <p><i>___ . 26(n)(v)(E) Unit 13-- the Paxson Closed Area, the eastern drainage of the Gulkana River lying west of the Richardson Highway and the western drainage of the Gulkana River between the Denali Highway and the north end of Paxson Lake where the Gulkana River enters Paxson lake is closed to the taking of big game.</i></p>
OSM Preliminary Conclusion	Oppose
Southcentral Regional Advisory Council Recommendation	
Eastern Interior Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	13 Oppose

**DRAFT STAFF ANALYSIS
WP16-16**

ISSUES

Proposal WP16-16, submitted by the Paxson Fish and Game Advisory Committee, requests that Federal public lands within the Paxson Closed Area in Unit 13 be closed to hunting big game by Federally qualified subsistence users.

DISCUSSION

The proponent requests closing Federal public lands to hunting big game within the Paxson Closed Area in Unit 13 for biological and esthetic reasons. Additionally, the proponent states that the Paxson Closed Area provides readily available viewing areas for moose, caribou, and brown bears which regularly access the small section of the Gulkana River in search of salmon.

Existing Federal Regulation

Unit 13

___.26(n)(v) In the following areas, the taking of wildlife for subsistence uses is prohibited or restricted on public lands:

Proposed Federal Regulation

Unit 13

___.26(n)(v) In the following areas, the taking of wildlife for subsistence uses is prohibited or restricted on public lands:

___. 26(n)(v)(E) Unit 13-- the Paxson Closed Area, the eastern drainage of the Gulkana River lying west of the Richardson Highway and the western drainage of the Gulkana River between the Denali Highway and the north end of Paxson Lake where the Gulkana River enters Paxson lake is closed to the taking of big game.

Existing State Regulation

Unit 13

***Paxson Closed Area:** the eastern drainage of the Gulkana River lying*

west of the Richardson Highway (between MP 182 and MP185.5) and the western drainage of the Gulkana River between the Denali Hwy (between MP0 and MP4.7) and the north end of Paxson Lake where the Gulkana River enters Paxson Lake is closed to the taking of any big game.

Extent of Federal Public Lands

Federal public lands comprise approximately 16% of Unit 13B and consist entirely of Bureau of Land Management (BLM) managed lands. Approximately 1,500 acres of land managed by BLM fall within the Paxson Closed Area and would be affected by this request (**Map1**).

Customary and Traditional Use Determinations

Residents that have a positive customary and traditional use determination for brown and black bears, caribou, Goat, Dall sheep, moose, wolf, and wolverines in Units 6,9,10,11,12,13, 20D and 16–26 are presented in **Table 1**.

Table 1. Unit specific customary and traditional use determinations.

SPECIES	CUSTOMARY AND TRADITIONAL DETERMINATION IN UNIT 13B
<i>Moose</i>	<i>Residents of Units 13, 20D (except for Fort Greely), Chickaloon, and Slana.</i>
<i>Caribou</i>	<i>Residents of Units 11, 12, (along the Nabesna Road and Tok Cutoff Road, mileposts 79-110). 13,20D (except for Fort Greely), and Chickaloon</i>
<i>Black Bear, Goat, Sheep, Wolverine</i>	<i>All rural residents.</i>
<i>Brown Bear</i>	<i>Residents of Unit 13 and Slana.</i>
<i>Wolf</i>	<i>Residents of Units 6, 9, 10 (Unimak Island only), 11, 12, 13, 16-26, and Chickaloon</i>

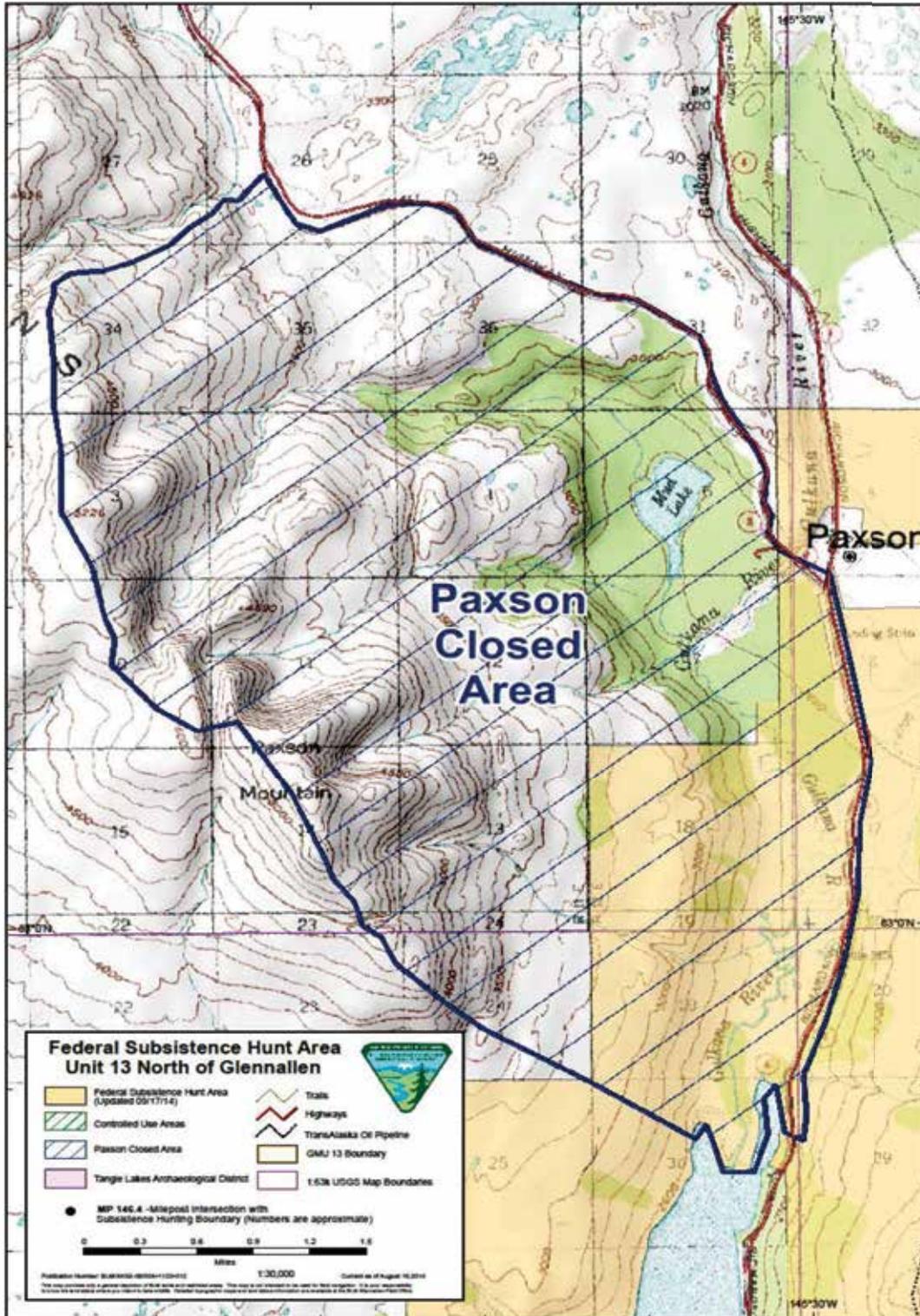
Regulatory History

The Paxson Closed Area in Unit 13B (**Map 1**) was established by the State in 1958 to provide a viewing area adjacent to the junction of the Richardson and Denali Highways (ADF&G 2015). During 1991/1992 and 1992/1993 regulatory years, Federal public lands within the Paxson Closed Area were closed to the hunting of big game under the Special Provisions section for Unit 13 in the Federal Subsistence Management Regulations for Federal public lands in Alaska. However, the hunting for small game was still allowed in the Paxson Closed Area. In 1992, the Federal Subsistence Board (Board) closed the Paxson Closed Area in Unit 13B to the taking of big game (57 Fed. Reg. 181. 43085 (C) [September 17, 1992] Proposed Rule).

However, in the Final Rule (58 Fed. Reg. 103. 31252-31295 [June 1, 1993]) references to several management areas or controlled use areas, including the Paxson Closed Area, that were identified in the 1992-1993 Subpart D of the Federal Subsistence Regulations were removed. This change coincided with the major conveyances/selections of BLM lands in Unit 13. Through Title IX of the Alaska National Interest Lands Conservation Act (ANILCA), the State of Alaska was allowed to overselect (by 25%) lands it wanted conveyed from the Federal Government. Once the State's selections have been established, prioritized, and finalized, any remaining overselected lands are returned to the BLM management authority. The State top filed (refers to the case where lands are dual selected {e.g Native and State} – the Native selection is attached to the land and the State selection would be over the top of that selection, thus *top filed*) the Federal public lands within the Paxson Closed Area in 1993 and 1994 and BLM made a “no effect” finding in 1994, 1995, and 2008. In June 2014, the Glennallen Field Office of BLM became aware of the unencumbered Federal public lands within the Paxson Closed Area and they were subsequently removed from State selection. As a result, Federal public lands in the Paxson Closed Area were determined to be opened to the taking of big game by Federally qualified subsistence users under Federal subsistence regulations.

Current Events

BLM has been working to convey selected lands throughout the State. In August 2014, it was determined that approximately 30,000 acres of BLM-managed lands near Paxson were not encumbered with selections from the State or Native-Select and thus met the Alaska National Interest Lands Conservation Act definition of public lands. Approximately 1,500 acres fell within the State's Paxson Closed Area. Consequently, once the land within the Paxson Closed Area returned to BLM control, it was open hunting of big game by default. In the absence of a closure enacted pursuant to the Federal Subsistence Board's *Policy on Closures to Hunting, Trapping and Fishing on Federal Public Lands and Waters in Alaska* (adopted Aug. 29, 2007), Federal public lands are open for hunting to both Federally qualified and non-Federally qualified users where



Map 1. Location of Federal public lands (Federal Subsistence hunt Area) within the Paxson Closed Area (BLM 2014).

Federal and State hunting regulations are in place. Thus, the Paxson Closed Area became open to both State and Federal users.

Biological Background

Big game as defined in the Federal Subsistence Regulations includes black bear, brown bear, bison, caribou, Sitka black –tailed deer, elk, mountain goat, moose, muskox, Dall sheep, wolf, and wolverine (§__25(a)). Currently there are open seasons on black bear, brown bear, caribou, goat, moose, sheep, wolf and wolverine on Federal public lands in Unit 13. Mountain goats and Dall sheep do not occur in the Paxson Closed Area so will not be considered in this analysis. Although wolverines occur in the Paxson Closed Area within Unit 13B, there is only limited density information in the moderate to high elevation areas for Units 13A and 13D and harvest information is only available unit–wide for Unit 13. Thus the available data may not be applicable to the forested habitats at lower elevations. Most of the wolverine harvest in Unit 13B, which averages about 12 per year, occurs north of Denali Highway outside of Paxson Closed Area (Robbins 2015, pers. comm.) Therefore, wolverine will not considered further in this analysis.

Caribou

The Nelchina Caribou Herd (NCH) population has fluctuated widely since the 1940s. The population was estimated to be between 5,000 –15,000 in the 1940s, 70,000 in the mid–1960s, 7,000–10,000 in 1972, and 50,000 in 1995.

State management goals and objectives since the late 1990s for NCH are as follows (Schwanke 2011):

- Maintain a fall population of 35,000–40,000 caribou, with a minimum of 40 bulls:100 cows and 40 calves:100 cows.
- Provide for the annual harvest of 3,000–6000 caribou.

From 2001 to 2010, fall population estimates for the NCH have remained relatively stable with an estimated herd size between 30,000–44,000 animals (**Table 2**). In June 2007, a post-calving census estimated the NCH to be approximately 32,569 caribou (ADF&G 2008). The population was estimated at 33,146 and 44,954 caribou in 2009 and 2010, respectively (ADF&G 2009, ADF&G 2010).

The productivity and recruitment for the NCH between 1985 and 1996 was high with an average of 52 calves:100 cows. The annual harvestable surplus of Nelchina caribou is dependent on productivity and survival of calves, which is determined from the June and October surveys conducted by ADF&G (ADF&G 2010). From 2001–2010 there was an average of 42 calves:100 cows, which is above State management goals (Toby and Kellyhouse 2007, ADF&G 2008, Schwanke 2011). During 2010, an average of 55 calves:100 cows were counted during the fall composition surveys (Schwanke 2011) .

Between 2001 and 2008, the bull:cow ratio was below the State management objective with an average of 32 bulls:100 cows. The lowest ratio of 23 bulls:100 cows was in 2006-2007. From 2008 to 2010, the average bull:cow ratio increased to 38 bulls:100 cows (**Table 2**).

Winter habitat for the NCH ranges from northern Unit 13 to Unit 20E. Winter range in 20E is generally considered high quality due to high lichen biomass as a result of old burns (>50 years) (Dale 2000, Joly et al. 2003). In 2004, a large proportion of NCH winter range in Unit 20E burned. Many caribou still winter in Unit 20E, although caribou now utilize adjacent unburned areas. Winter distribution for the NCH in 2006 extended into Unit 13E, across Units 13A and 13B, and northeast into Units 11, 12 and 20E (Tobey and Kelleyhouse 2007). In some years, a small number of caribou winter in Unit 13D and have been observed as far south as the Edgerton Highway. The eastern Talkeetna Mountains, from the Fog Lakes southeast to the Little Nelchina River, is the typical calving area for the NCH with the core calving area extending from the Little Nelchina River north to Kosina Creek (Tobey and Kelleyhouse 2007).

Moose

In the early 1900s moose densities in Unit 13 were low but increased gradually until peaking in the mid-1960s. The population then declined due to a combination of factors including overhunting, severe winters, and predation. The population reached a low in 1975 and then started to increase by 1978, reaching a second peak in 1987. From 1987-2001 the moose population declined by an estimated 47% (Tobey and Schwanke 2008, 2010).

State management goals and objectives for moose in Unit 13 are as follows (Tobey and Schwanke 2010):

- Increase the Unit 13 moose population to 20,000 to 30,000 moose with a minimum of:
 - 25–30 calves:100 cows.
 - 25 bulls:100 cows
 - 10 yearling bulls:100 cows
- Provide for an annual harvest of 1,200–2000 moose and a subsistence harvest of 300–600 moose per year.

Alaska Department of the Fish and Game (ADF&G) conducts fall counts to determine the sex and age composition and population trends in large count areas distributed throughout Unit 13. From 2001–2009 the number of moose observed in Unit 13 during the fall increased from 3466 in 2001 to 4,481 in 2008 (**Table 3**). Although the bull:cow and yearling bull:cow ratios increased with the population increases between 2001–2008, the calf:cow ratios were below the management objective.

Table 2. Nelchina caribou fall composition counts and estimated herd size, regulatory years 2001 – 2010 (Tobey and Kelleyhouse 2007, ADF&G 2008, Schwanke 2011, Robbins 2015, pers.comm.).

Regulatory Year	Total bulls: 100 cows	Calves: 100 cows	Calves (%)	Cows (%)	Total bulls (%)	Composition Sample size	Total Adults	Estimate of herd size	Post calving count ^a
2001-2002	37	40	22	57	21	3,949	26,159	33,745	35,106
2002-2003	31	48	27	56	17	1,710	25,161	34,380	35,939
2003-2004	31	35	21	60	19	3,140	23,786	30,141	31,114
2004-2005	31	45	26	57	17	1,640	27,299	36,677	38,961
2005-2006	36	41	23	57	20	3,263	28,071	36,428	36,993
2006-2007	24 ^b	48 ^b	25	61	14	3,300	NA	34,699 ^b	N/A
2007-2008	34	35	21	59	20	3,027	26,124	32,569	33,744
2008-2009	39	40	22	56	22	3,378	NA	33,288 ^b	N/A
2009-2010	42	29	17	58	25	3,076	28,198	33,837	33,146
2010-2011	64	55	25	46	29	5,474	33,646	44,985	44,954
2011-2012	58	45	22	49	29	3907	32404	41394	
2012-2013	57	31	16	54	30	5249	43386	50646	

^a Spring census
^b Modeled estimate

Table 3. Unit 13 fall aerial moose composition counts (Tobey and Schwanke 2008, Tobey and Schwanke 2010, Robbins 2015, pers.comm.).

Year	Bulls:100 cows	Yearling bulls: 100 cows	Calves: 100 cows	% Calves	Adults observed	Total moose observed	Moose/hour	Density moose/mi ² (observed range)
2001	23	3	15	11	3,086	3,466	37	1.0 (0.6 – 1.4)
2002 ^a	24	6	22	15	2,918	3,428	36	1.0 (0.5 – 1.2)
2003	24	8	18	12	3,707	4,230	47	1.2 (0.5 – 1.7)
2004	28	6	22	15	3,215	3,768	40	1.1 (0.5 – 1.7)
2005	27	7	18	13	3,500	4,009	45	1.1 (0.4 – 1.4)
2006	30	8	23	15	3,416	4,028	49	1.1 (0.5 – 1.5)
2007 ^b	32	10	22	14	3,875	4,517	40	1.3 (0.5 – 1.8)
2008 ^c	35	12	19	13	3,918	4,481	54	1.3 (0.5 - 1.9)
2009 ^b	34	9	23	15	4,315	5,046	50	1.7 (0.5-2.0)
2010	30	10	21	14	4558	5,313	53	1.5 (0.6-2.2 0)
2011	33	10	23	15	4777	5604	53	1.6 (0.5-2.2)
^a Two of eight count areas were not flown in 2002, therefore data was estimated for those areas								
^b One of eight count areas was not flown in 2007, therefore data was estimated								
^c (Schwanke 2009, pers. comm..)								

Moose are most abundant along the southern slopes of the Alaska Range and within the Alphabet Hills portion of Unit 13B (**Table 4**). Moose typically congregate in subalpine habitats during fall rutting and move down to lower elevations as the snow increases. Historically, moose numbers in Unit 13B tend to fluctuate more than in lower density areas (Tobey and Schwanke 2008). From 2001–2009, the bull:cow ratio was close to or exceeded management objectives, whereas the yearling:cow and calf:cow ratios were below management objectives. In 2009, the bull:cow and calf:cow ratios for Unit 13B met the management objectives but the yearling bull:cow ratio did not (**Table 4**) (Tobey and Schwanke 2010).

Winter distribution depends mainly on snow depth and to a lesser extent, wolf distribution (Tobey and Schwanke 2010). Severe winters with deep snow are known to cause winter mortality by increasing nutritional stress through restriction of movements. This prevents access to adequate and/or quality food (Coady 1974, Testa 2004, Bubenik 2007, Innes 2010), and increases the risk of predation, primarily by

Table 4. Unit 13B fall aerial moose composition counts (2001-2007) (Tobey 2002, Tobey 2004, Tobey and Kelleyhouse 2006, Tobey and Schwanke 2008, Tobey and Schwanke 2010, Robbins 2015, pers. comm.)

Year	Bulls:100 cows	Yearling bulls: 100 cows	Calves: 100 cows	% Calves	Total moose observed	Density moose/mi ²
2001	22	3	16	11	1,833	1.2
2003	22	6	17	12	1,943	1.3
2005	27	7	23	15	1,891	1.3
2007	35	12	20	13	2,265	1.5
2009	36	7	29	18	2,230	1.5
2011	36	10	25	15	2,677	1.8

wolves (Bishop and Rausch 1974, Peterson 1984). Snow depths greater than 35 inches represent a critical depth for adults (Coady 1974) with calves, older adults (≥ 8 yrs old), and adult males more susceptible to nutritional stress and death (Coady 1982).

In 2004–2005, despite the severe snowpack conditions compared to the previous 11 years (Testa 2004), moose numbers remained fairly stable in Unit 13B (Tobey and Schwanke 2008).

Brown and Black Bear

Information concerning the management of brown and black bears in Unit 13B is sparse, with most of the information coming from what is known unit wide. The State's management objective is to have a population of 350 brown bears in Unit 13. Most of the information on population size, composition, reproductive and survival rates for brown bears in Unit 13 come from studies conducted between 1980-1988 (Schwanke 2011b). All the available population estimates are based on anecdotal information and/or extrapolation. The most recent brown bear population estimate, based on density estimates from studies conducted in the Upper Susitna River from 1979-1987 (Ballard et al. 1982, Miller 1987, 1988) was 1,456 in 1997 (Miller 1997).

From 2005 to 2009, 120 brown bears per year were harvested by residents in Unit 13B with an average of 140 bears harvested per year unit wide (Schwanke 2011b). Although the first Federal subsistence season for brown bears in Unit 13 was established in 1999 (FWS 1999) there is no harvest data available for brown bears taken on Federal public lands in Unit 13B.

Black bears in Unit 13 typically inhabit forested areas during the winter and summer and move into the shrub zones to feed on berries in the fall and occasionally during the spring (Miller 1987). In 1985, based on a study conducted in the Upper Susitna River, there were an estimated 90 black bears/1,000 km² (Robbins 2011). No population estimates were made for Unit 13 because the area studied by Miller (1987) was considered marginal habitat compared to more favorable areas of Unit 13 (Robbins 2011). From 2005 to 2009, 17 black bears per year were harvested in Unit 13B and an average 145 bears/yr. were harvested unit wide (Robbins 2011). Due primarily to the status of the Paxson Closed Area, there is no data available for black bear harvest by Federally qualified subsistence users on Federal public lands in Unit 13B.

Wolf

Wolf populations in Unit 13 have fluctuated since the 1930s due to prey densities, hunting and trapping, and predator control efforts by the U.S. Fish and Wildlife Service between 1948 and 1953 and ADF&G since 2000 (Skooog 1968, Ballard et al. 1987). Population size and trends are monitored through information obtained from a variety of sources including trapper surveys, sightings from Federal and State employees, and the public. This information is combined with the sealing data to develop pre-harvest (fall) and post-harvest (spring) population estimates for Units 13A, 13B, 13C and a portion of 13E (Schwanke 2102).

State management goals and objectives for wolves are as follows (Schwanke 2012):

- Determine wolf population estimates yearly
- Achieve and maintain a post-hunting and trapping season population of 135-163 wolves (3.2-3.9 wolves/1,000 km²) in the available habitat unit wide.

The spring wolf population in Unit 13 was approximately 230 wolves between 2000 and 2005 and within the population objective between 2006–2008 and 2010 (**Table 5**, Schwanke 2012). In 2010-2011 the spring population estimate for Unit 13B was 29 (7.3/1,000 km²). The average spring density was 3.6/1,000 km² for the entire unit from 2010-2011. Information on the distribution and movements of radio-collared wolves has shown that immigration into Unit 13 from the Kenai Peninsula, Denali National Park, Unit 12, and Unit 20 is relatively common (Schwanke 2012). Approximately 80% of wolf mortality in Unit 13 is due to human harvest, 11% to intraspecific strife, and 9% to accidents, injuries, starvation, and drowning (Ballard 1987).

Harvest History

Although there has been no *legal* harvest of big game species in the Paxson Closed Area within Unit 13B since 1992, hunting has occurred in Unit 13B outside of the closed area. (**Table 6, Table 7, Table 8, Table 9**). It is not anticipated that the harvest of big game species on Federal public lands within the Paxson Closed Area would negatively impact populations of big game species as the area in question is only 1,500 acres.

Table 5. Wolf spring and fall population estimates in Unit 13 from 2006-2010 (Schwanke 2012, Robbins 2015, pers. comm.).

Regulatory Year	Fall ^a		Spring ^b		Packs
	Pop	Range	Pop	Range	
2006-2007	280	(265–295)	160	(145–175)	54
2007-2008	254	(240–270)	153	(145–175)	46
2008-2009	273	(260–280)	144	(135–160)	49
2009-2010	272	(260–280)	180	(165–190)	54
2010-2011	314	(290–315)	146	(145-175)	55
2011-2012	204		104		
2012-2013	266		191		
2013–2014	320				

^a Fall estimate – Pre-trapping season population

^b Spring estimate – Post-trapping season population

Table 6. Number of Federal harvest permits, sex composition, and caribou harvest in Unit 13B between 2003-2013 (OSM 2015, Robbins 2015, pers. comm.).

Year	Number of Permits Issued	Number of Permits Hunted	Caribou Harvest	Bulls	Cows	Unknown
2003/04	152	152	79	79	0	0
2004/05	1095	1,091	298	219	78	1
2005/06	1160	1,160	582	344	231	7
2006/07	1160	1,160	550	303	233	14
2007/08	24893	893	357	235	116	6
2008/09	904	904	257	169	84	4
2009/10	1072	1,066	338	332	6	0
2010/11	1079	1,073	411	293	114	4
2011/12	699	699	86	54	31	0
2012/13	769	769	361	226	132	2
2013/14	641	640	147	112	35	0
Total	9624	9,607	3,466	2,366	1,060	38
Mean	875	873	315	215	96	3

Table 7. State and Federal caribou harvest in Unit 13B.

Year	State Harvest	Federal Harvest
2009/10	546	338
2010/11	1,183	411
2011/2012	988	86
2012-2013	1,714	361
2013-2014	775	147

Table 8. Harvest quota, harvest estimate, and estimates of the fall population for the Nelchina Caribou Herd in Unit 13 (Robbins 2015, pers. comm.)

Year	Harvest Quota	Reported Harvest	Fall Population ^a
2010	2300	2439	48,000
2011	2400	2515	41,000
2012	5500	4429	50,000
2013	2500	2640	37,000
2014	3000	2818 ^b	

^a General estimate for comparison

^b Preliminary results hunt closed March 31

Table 9. Unit 13B big game harvest 2009-2013 (OSM 2015, Robbins 2015, pers. comm.)

Year	Moose	Brown Bear	Black Bear	Wolf	Wolverine
2009/10	244	26	5	17	12
2010/11	304	18	3	14	11
2011/12	267	18	7	20	8
2012/13	201	20	4	10	12
2013/14	201	22	7	24	16
Total	1217	104	26	85	59
Mean	243	21	5	17	12

Effects of the Proposal

If Federal public lands within the Paxson Closed Area remains open to Federally qualified subsistence users, there is the potential of increased conflict with others that use the area for recreational purposes such as viewing moose, caribou, and brown bears, which regularly access the small section of the Gulkana River in search of salmon. Local community members stated that the area provides a critical sanctuary for moose during the winter, and that there could be potential disruption to the caribou herd migration if it remains open to Federally qualified subsistence users. In addition, there may be safety concerns and the potential loss of tourism. Safety concerns may be somewhat diminished since the hunting of small game has occurred in the Paxson Closed Area since it was established.

The Southcentral Subsistence Regional Advisory Council expressed support at its winter 2015 meeting (SCRAC 2015) for keeping Federal public lands open to subsistence hunting of big game. Currently, there are no conservation concerns for any of the big game species in the area that would warrant a closure of Federal public lands or waters. Opening these lands to Federally qualified subsistence users does not prevent non-Federally qualified users from accessing this area.

OSM PRELIMINARY CONCLUSION

Oppose Proposal WP16-16

Justification

Section 816 of ANILCA provides that an area may be closed “for reasons of public safety, administration, or to assure the continued viability of a particular fish or wildlife population.” Such closure authority has been delegated to the Federal Subsistence Board at §__ .10(d)(4)(vii). None of the three reasons for enacted a closure are present. Populations of big game species that occur within Unit 13B are stable or increasing and thus there are no conservation concerns. Current levels of harvest have not had a negative impact on big game species in Unit 13B. Sustainable harvest levels for big game species are evaluated by ADF&G, with regulations and permit numbers adjusted as needed. The Paxson Closed Area is approximately 29,000 acres and the size of the area open to Federally qualified subsistence users is a very small portion, approximately 1,500 acres, and thus the impacts to viewing opportunities will be minimal.

Moreover, opposition is supported by the Federal Subsistence Board’s *Policy on Closures to Hunting, Trapping and Fishing on Federal Public Lands and Waters in Alaska*. There, the Board established a hierarchy that would be followed in closures: (1) closure first to non-Federally qualified users, (2) allocation among Federally qualified subsistence users under Section 804, and (3) complete closure. This proposal skips the first step and seeks closure to Federally qualified subsistence users without first closing to non-Federally qualified users. Federally qualified subsistence users should be allowed the opportunity to harvest big game species on Federal public lands within Paxson Closed Area in Unit 13B.

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WRITTEN PUBLIC COMMENTS

PAGE 1

To: Office of Subsistence Management
In regards to Wildlife Proposal WP16-16
Paxson Closed Area.
Comments:

My name is Bill Nowotny Live mile 150
(Sourdough) I AM NOT in favor of closing
THE PAXSON moose, caribou, Bear Bill Nowotny
5-6-2015

My Name is Jim Murray I live at Meiers Lk
MI 170 Richardson Hwy There is NO biological
Reason to close this Area To Subsistence
Hunting

Jim Murray 5-6-2015

Please leave this hunting area open for Federal
hunting. There are very few areas for us to hunt as
it is. Thank you for your help and consideration
in this matter.

Shane Huckabay 5-7-2015

leave it open ~~to the~~
Patty Denton - I live at Sourdough, AK,
We want the WP16-16 left open
Patty Denton 5-6-15

I Total Denton feel that there is no reason for
the Paxson closed Area ~~open~~ Federal hunting should be
left open
D. Denton 5-6-15

There's not many places to hunt anymore ^{PAGE 2}
since I lived in this area for over 50 years.
And have seen things get worse every
year. Leave this area open.

P.O. Box 122
Glennallen, AK 99588
H.A. (Tommy) Unsicker

Request that this area be left open as it's getting more
difficult to obtain hunting areas

Dale Uneda
P.O. Box 616
Glennallen, AK 99588

Dale Uneda

JAMES COOPER
P.O. Box 257

Glennallen, AK 99588

Petition for current Federal hunt areas
to remain ^{open} on Richardson Hwy
mile points 175.1 to 183

Jeremiah Jones
Keep area open

Jeremiah Jones

Rocky Oliver
P.O. Box 803 Glennallen
Keep area open

Roman K. Foltz
P.O. Box 375
Keep open

Ahtna Tene Nene' Customary & Traditional Use Committee Comments

WP16-16 Closure Of The Paxson Hunting Areas

Comments:

We oppose WP 16-16 which proposes the closure of the Paxson Area which is unencumbered federal public lands. Federally qualified subsistence users will not have an opportunity to hunt for large and small game near or off the highway system within the Paxson hunting areas.

Closure of this significant customary and traditionally use area for hunting, gathering and fishing will disenfranchise federally qualified subsistence users. Federally qualified subsistence users will have to hunt elsewhere on federal public lands, other federal public lands are largely inaccessible.

Hunting areas on Federal public lands in Unit 13 is minimal. Closing this additional acreage in which to hunt for large and small game would be disadvantageous to the local federally qualified subsistence users. Paxson areas are the ideal place to hunt, fish and pick berries. Closure of the Paxson Areas will adversely affect hunters that combine hunting with other subsistence activities, such as picking berries or fishing.

Paxson Lake area, as described above, were/are Ahtna People's customary and traditionally use areas for hunting, gathering and other subsistence purposes. Ahtna people have used these areas for thousands of years, to hunt, fish and gather plants. Please refer to the report entitled, *Some Ethnographic and Historical Information on the Use of Large Land Mammals in the Copper Basin* by William E. Simeone: page 38, August 2006, it states, "in some areas places, such as Paxson Lake, Tanada Lake, or Tazlina Lake, caribou were stampeded into the water and speared from canoes". Other documentation, in this report by the late Ahtna Chief Ben Neeley, states that he and his family hunted up the Gulkana River and into the Tangle Lakes area: page 28, August 2006.

WP16–17 Executive Summary	
General Description	Proposal WP16–17 requests that the restriction prohibiting Federally qualified subsistence users from hunting caribou within the Trans-Alaska Oil Pipeline right-of-way in Unit 13 remainder be rescinded. <i>Submitted by the Southcentral Alaska Subsistence Regional Advisory Council.</i>
Proposed Regulation	<p>Unit 13 remainder – Caribou</p> <p><i>2 bulls by Federal registration permit only</i> <i>Aug. 1–Sept. 30</i></p> <p><i>You may not hunt with the Trans-Alaska oil Pipeline right-of-way. The right-of-way is the area occupied by the pipeline (buried or above ground) and the cleared area 25 feet on either side of the pipeline.</i> <i>Oct. 21–Mar. 31</i></p>
OSM Preliminary Conclusion	Support
Southcentral Regional Advisory Council Recommendation	
Eastern Interior Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	1 Support

**DRAFT STAFF ANALYSIS
WP16-17**

ISSUES

Proposal WP16-17, submitted by the Southcentral Alaska Subsistence Regional Advisory Council, requests that the restriction prohibiting Federally qualified subsistence users from hunting caribou within the Trans-Alaska Oil Pipeline right-of-way in Unit 13 remainder be rescinded.

DISCUSSION

The proponent states that the current restriction in Unit 13 remainder is an undue burden on Federally qualified subsistence users and is not related to any conservation concerns for the Nelchina Caribou Herd. The proponent also states that rural residents are subject to citations, while there are no restrictions to hunting within the pipeline corridor under current regulations.

Existing Federal Regulation

Unit 13 remainder – Caribou

2 bulls by Federal registration permit only

*Aug. 1–Sept. 30
Oct. 21–Mar. 31*

You may not hunt with the Trans-Alaska Oil Pipeline right-of-way. The right-of-way is the area occupied by the pipeline (buried or above ground) and the cleared area 25 feet on either side of the pipeline.

Proposed Federal Regulation

Unit 13 remainder – Caribou

2 bulls by Federal registration permit only

*Aug. 1–Sept. 30
Oct. 21–Mar. 31*

~~*You may not hunt with the Trans-Alaska oil Pipeline right-of-way. The right of way is the area occupied by the pipeline (buried or above ground) and the cleared area 25 feet on either side of the pipeline.*~~

Unit 13E: Residents of Units 11, 12 (along the Nabesna Road), 13, Chickaloon, McKinley Village, and the area along the Parks Highway between mileposts 216-239 (excluding the residents of Denali National Park Headquarters).

Regulatory History

The Nelchina Caribou Herd (NCH) is an important resource for many rural and non-rural users due to its proximity to Anchorage and Fairbanks and its distribution within Units 11, 12, 13, and 20E (Tobey 2003). A State Tier II system for NCH harvest was established in 1990 for Unit 13. A State Tier I permit was added for the 1996/97 and 1997/98 seasons to allow any Alaskan resident to harvest cows or young bulls, in order to reduce the herd to the management objective. In 1998, the Tier I hunt was closed, as the herd was brought within management objectives due to increased harvest and lower calf recruitment.

The two Federal registration hunts in Unit 13 are for residents of Units 11, 13, and residents along the Nabesna Road in Unit 12 and Delta Junction in Unit 20. In 1998 the Federal Subsistence Board (Board) adopted Proposal P98-036 to extend the winter caribou season from Jan. 5–Mar. 31 to Oct. 21–Mar. 31 (FWS 1998a). This gave Federally qualified subsistence users the same opportunity to harvest an animal as those hunting under the State regulations. In 1998, the Board adopted Proposal P98-034, which opened the Federal registration hunt to residents of Unit 12, Dot Lake, Healy Lake and Mentasta between November and April when the NCH migrate through the Tetlin National Wildlife Refuge (FWS 1998b).

In 2001, the Board adopted Proposal WP01-07, which changed the harvest limit of 2 caribou to 2 bulls by Federal registration permit only, for all of Unit 13 (FWS 2001).

In 2003, the Board adopted Proposal WP03-14, which changed the harvest limit for Unit 13A and 13B back to 2 caribou from 2 bulls, with the harvest of bulls being allowed only during the Aug. 10 – Sept. 30 season. For the Oct. 21 – Mar. 31 winter season, the BLM's Glennallen Field Office Manager was delegated authority to determine the sex of animals taken in consultation with the Alaska Department of Fish and Game (ADF&G) area biologist and the Chairs of the Eastern Interior Alaska and Southcentral Alaska Regional Subsistence Advisory Councils. For the remainder of Unit 13, the harvest limit remained 2 bulls for the Aug. 10 – Sept. 30 and Oct. 21 – Mar. 31 season (FWS 2003).

In 2005, the Board adopted Proposal WP05-08 for Unit 13A and 13B to allow the sex of caribou harvested to be determined for both seasons by the BLM Glennallen Field Office Manager in consultation with the ADF&G area biologist and Chairs of the Eastern Interior Alaska and Southcentral Alaska Regional Subsistence Advisory Councils. This was in effect for the entire season (Aug. 10 – Sept. 30 and Oct. 21 – Mar. 31), not just the winter season (FWS 2005).

Emergency Order 02-01-07 closed the remainder of the 2006/2007 State season for the NCH on February 4, 2007 due to high State hunter success in the State Tier II hunt. Likewise, Emergency Order 02-08-07 closed the 2007/2008 Tier II hunt on September 20, 2007 and was scheduled to

re-open on October 21, 2007. However concerns about unreported harvest in the State and Federal hunt resulted in a closure for the remainder of the season.

For the 2009/2010 season, the State Tier II hunt was eliminated. Two hunts were added: a Tier I hunt and a Community Harvest hunt for residents of Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Copper Center. The harvest limit for each was one caribou (sex to be announced annually) with season dates of Aug. 10 – Sept. 20 and Oct. 21 – Mar. 31 with a harvest quota of 300 caribou. A Federally qualified subsistence user could opt into the State community harvest system or use a State registration permit to harvest one caribou and then get a Federal permit to harvest an additional caribou since the Federal harvest limit was two caribou.

In July 2010, the Alaska Superior Court found that elimination of the Tier II hunt was arbitrary and unreasonable (ADF&G 2010a). In response, the Board of Game held an emergency teleconference in July 2010, and opened a Tier II hunt from Oct. 21 – Mar. 31, maintained the existing Tier I season, awarded up to 500 additional Tier I permits (ADF&G 2010a).

Emergency Order 04-1-10 closed the remainder of the winter Nelchina Tier II season due to harvest reports indicating that approximately 1,404 bulls and 547 cows were harvested and the unreported harvest was expected to raise the total harvest above the harvest objective (ADF&G 2010b, FWS 2102).

In 2012, the Board adopted Proposal WP12-25, which added an additional 9 days to the beginning of the fall caribou season to provide more opportunity for Federally qualified subsistence users. The season was extended from Aug. 10–Sept. 30 to Aug. 1 –Sept. 30 (FWS 2012).

Biological Background

The NCH calving occurs in the eastern Talkeetna Mountains from the Little Nelchina River north to Fog Lakes, with the core calving area from the Little Nelchina River to Kosina Creek. Core calving areas are also used during post calving and early summer (Schwanke 2011). The NCH disperses during the summer and early fall. Their fall distribution can extend from the Denali Highway near Butte Lake, across the Alphabet Hills and Lake Louise flats, and as far east as the Gulkana River (Schwanke 2011).

The NCH typically leaves Unit 13 in October for wintering areas in Units 11, 12, and 20E and typically does not return until April. Some caribou remain in the northern portion of Unit 13 and are an important food source for Federally qualified subsistence users during the winter season. Winter range in Unit 20E is generally considered high quality due to high lichen biomass as a result of old burns (>50 years) (Dale 2000, Joly et al. 2003). In 2004, a large proportion of NCH winter range in Unit 20E burned. Many caribou (60-95%) still winter in Unit 20E, although caribou now utilize adjacent unburned areas (Schwanke 2011). In addition to winter habitat loss in Unit 20E, competition with the Fortymile herd, which also uses Unit 20E year round (Boertje and Gardner 1998) and is increasing, could impact the NCH. Winter distribution for the NCH in 2006 extended into Unit 13E, across 13A and 13B, and northeast into Units 11, 12 and 20E (Tobey and

Kelleyhouse 2007). In some years, a small number of caribou winter in Unit 13D and have been observed as far south as the Edgerton Highway.

The NCH population has fluctuated widely since the 1940s. The population was estimated to be between 5,000–15,000 in the 1940s, 70,000 in the mid-1960s, 7,000–10,000 in 1972, and 50,000 in 1995.

State management goals and objectives for the NCH are as follows (Schwanke 2011):

- Maintain a fall population of 35,000–40,000 caribou, with a minimum of 40 bulls:100 cows and 40 calves:100 cows.
- Provide for the annual harvest of 3,000–6000 caribou.

In June 2007, NCH was estimated to be approximately 32,569 caribou (ADF&G 2008) from a post-calving survey. The population was estimated at 33,000 and 44,000 caribou in 2009 and 2010 respectively (ADF&G 2009, ADF&G 2010c). From 2001 to 2013 fall population estimates for the NCH have remained relatively stable, with an estimated herd size between 30,000-50,000 animals (**Table 1**).

Historically, the productivity and recruitment of the NCH has been high, with an average of 52 calves:100 cows (1985-1996). The annual harvestable surplus of Nelchina caribou is dependent on productivity and survival of calves, which is determined from surveys in June and October conducted by ADF&G (ADF&G 2010c). From 2001–2010 there was an average of 42 calves:100 cows, which is above State management objectives (Toby and Kellyhouse 2007, ADF&G 2008, Schwanke 2011). During 2010, an average of 55 calves:100 cows were counted during the fall composition surveys (Schwanke 2011).

Between 2001 and 2008, the bull:cow ratio was below the State management objective with an average of 32 bulls:100 cows. The lowest bull:cow ratio was in 2006-2007 with 23 bulls:100 cows. The average bull:cow ratio increased significantly from 38 bulls:100 cows from 2008 to 2010, to 80 bulls:100 cows from 2011–13 (**Table 1**). Relatively mild winters combined with fewer predators are factors that may have contributed to this increase (Robbins 2015, pers. comm.).

Table 1. Nelchina caribou fall composition counts and estimated herd size, regulatory years 2001 – 2010 (Tobey and Kelleyhouse 2007, ADF&G 2008, 2010c, Schwanke 2011, Robbins 2015, pers.comm.).

Regulatory Year	Total bulls: 100 cows	Calves: 100 cows	Calves (%)	Cows (%)	Total bulls (%)	Composition Sample size	Total Adults	Estimate of herd size	Post calving count ^a
2001-2002	37	40	22	57	21	3,949	26,159	33,745	35,106
2002-2003	31	48	27	56	17	1,710	25,161	34,380	35,939
2003-2004	31	35	21	60	19	3,140	23,786	30,141	31,114
2004-2005	31	45	26	57	17	1,640	27,299	36,677	38,961
2005-2006	36	41	23	57	20	3,263	28,071	36,428	36,993
2006-2007	24 ^b	48 ^b	25	61	14	3,300	NA	34,699 ^b	N/A
2007-2008	34	35	21	59	20	3,027	26,124	32,569	33,744
2008-2009	39	40	22	56	22	3,378	NA	33,288 ^b	N/A
2009-2010	42	29	17	58	25	3,076	28,198	33,837	33,146
2010-2011	64	55	25	46	29	5,474	33,646	44,985	44,954
2011-2012	58	45	22	49	29	3907	32,404	41,394	
2012-2013	57	31	16	54	30	5249	43,386	50,646	

^a Spring census
^b Modeled estimate

Harvest History

The NCH continues to be a popular hunt for many users because of its easy accessibility and proximity to Fairbanks and Anchorage. The number of caribou harvested under the Federal Subsistence regulations in the 2013/2014 regulatory year (279) was below the long term average 410 per year (range 273-610) from 2003–2013 (**Table 2**).

Between 2004 and 2009, State hunts (TC566/RC566) were the primary source of harvest of the NCH and accounted for 75% of the overall harvest (**Table 3**). Federal registration hunts (FC1302; formerly RC513/514), administered by the BLM comprised 24% of the harvest from 2004 to 2009. From 2004 to 2013, harvest under a Federal registration permit has averaged 410 caribou annually (range 273 to 610) (**Table 2**).

Table 2. Number of Federal harvest permits, sex composition, and caribou harvest in Unit 13 between 2003-2013 (Bullock 2015, OSM 2015, Robbins 2015, pers.comm.).

Year	Number of Permits Issued	Number of Permits Hunted	Caribou Harvest	Bulls	Cows	Unknown
2003/04	2,574	1,240	322	317	2	3
2004/05	2,555	1,337	335	248	85	2
2005/06	2,557	1,499	610	365	238	7
2006/07	2,631	1,317	570	318	238	14
2007/08	2,403	1,094	385	259	120	6
2008/09	2,532	1,229	273	180	89	4
2009/10	2,576	1,339	349	342	7	0
2010/11	2,852	1,535	451	316	129	6
2011/12	2,980	1,425	395	281	113	0
2012/13	2,953	1,518	537	326	203	6
2013/14	2,789	1,305	279	210	68	0
Mean	2,673	1,349	410	287	117	4

Table 3. State and Federal caribou harvest in Unit 13.

Year	State Harvest	Federal Harvest
2009/10	754	349
2010/11	1,905	451
2011/2012	2,033	395
2012-2013	3,718	537
2013-2014	2,301	279

A majority of the caribou harvested in Unit 13 are taken under State regulations (**Table 3**), which is expected given that Federal lands account for only about 15% of the total lands in Unit 13. Much of the Federal harvest occurs when caribou cross along the Richardson Highway between Paxson and Sourdough during the fall migration. Additional caribou are available to Federally qualified subsistence users throughout the entire season in small areas of 13E near Broad Pass in Denali National Park and on BLM lands along the Denali Highway near Tangle Lakes (Tobey 2005). The mean yearly caribou harvest from 2010/2011 to 2014/2015 was 2,968 caribou, (**Table 4**) which is greater than the long-term annual average harvest of approximately 2,500 caribou between 1989 and 2010 (Schwanke 2011).

Most of the caribou harvest each year in Unit 13 occurs during the fall (August and September) versus the winter season. Federally qualified subsistence users currently have an additional 10 day season at the end of September and the harvest within the first week of August is minimal compared to the State harvest

during the same time period. Success in the winter season is largely dependent upon the number of caribou that remain within Unit 13 and the success of the fall hunt. Successful harvests in the fall make the winter season more susceptible to emergency closures when the harvest quota is reached before the end of the season on March 31. The winter hunt can be important to Federally qualified subsistence users because snow machines often make caribou more accessible during a period when there is typically less competition with other hunters (Tobey and Kelleyhouse 2007).

Table 4. Harvest quota, harvest estimate, and estimates of the fall population for the Nelchina Caribou Herd in Unit 13 (Robbins 2015, pers. comm.)

Year	Harvest Quota	Reported Harvest	Fall Population ^b
2010/2011	2,300	2,439	48,000
2011/2012	2,400	2,515	41,000
2012/2013	5,500	4,429	50,000
2013/2014	2,500	2,640	37,000
2014/2015	3,000	2,818 ^a	
Mean		2,968	

^a Preliminary results hunt closed March 31

^b General estimate for comparison

Effects of the Proposal

If adopted, this proposal would remove restrictions on Federally qualified subsistence users hunting under Federal regulations within the Trans-Alaska Oil Pipeline right-of-way and will give them the same opportunity as hunters hunting under State regulations. Currently there are no conservation concerns for the NCH population.

One of the justifications for maintaining a closure under the Board’s closure policy is for public safety. While there is a concern that the use of high-powered rifles in the vicinity of the Trans-Alaska Oil Pipeline right-of-way, there is no reason to deny Federally qualified subsistence users hunting under State regulations the same opportunity as those hunters hunting under State regulations. There have been no incidents since 2001, when an individual shot a hole in the Trans-Alaska Oil Pipeline, spilling 285,000 gallons of crude oil and shutting down the pipeline for three days.

OSM PRELIMINARY CONCLUSION

Support Proposal WP16–16.

Justification

The NCH within Unit 13 is stable or increasing, and there are currently no conservation concerns for the herd. Current harvest levels are sustainable and there is no indication that removal of the pipeline right-of-way restrictions for Federally qualified subsistence users is going to substantially increase harvest. Removal of restrictions for hunting in the Trans–Alaska Pipeline right-of-way will allow the Federally

qualified subsistence users to use the Pipeline corridor without fear of incurring hunting violations, and will provide the same opportunity provided under State regulations.

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WRITTEN PUBLIC COMMENTS

Ahtna Tene Nene' Customary & Traditional Use Committee Comments

WP16-17 Trans-Alaska Oil Pipeline Right-of-way Is Prohibited

Comments:

We support Proposal WP 17-16 to remove regulatory language that hunting within the Alaska Oil Pipeline right-of-way is illegal.

As the proposal states, hunting in the Alaska Oil Pipeline right-of-way under federal regulation is more restrictive than state regulations. Federal regulations should allow more liberal hunting opportunities than state regulations. Hunting for moose under state regulations in the Alaska Oil Pipeline right-of-way is not regulated.

WP16–18 Executive Summary	
General Description	Proposal WP16-18 requests that brown bears be allowed to be hunted over bait in Units 11 and 12 with seasons from Apr. 15-June 15 and Apr. 15-June 30, respectively. <i>Submitted by: Wrangell-St. Elias National Park Subsistence Resource Commission.</i>
Proposed Regulation	<p>§ __.26 (b) <i>Except for special provision found at paragraph (n)(1) through (26) of this section, the following methods and means of taking wildlife for subsistence uses are prohibited:</i></p> <p style="text-align: center;">* * * *</p> <p>(14) <i>Using bait for taking ungulates, bear, wolf, or wolverine; except you may use bait to take wolves and wolverine with a trapping license, and you may use bait to take black bears and brown bears with a hunting license as authorized in Unit-specific regulations at paragraphs (n)(1) through (26) of this section.</i></p> <p style="text-align: center;">Unit 11—Brown Bears</p> <p style="text-align: center;"><i>1 bear</i> <i>Aug. 10-June 15.</i></p> <p style="text-align: center;"><i>(i) Unit specific regulations:</i></p> <p style="text-align: center;"><i>(A) You may use bait to hunt black and brown bear between April 15 and June 15.</i></p> <p style="text-align: center;">Unit 12—Brown Bears</p> <p style="text-align: center;"><i>1 bear</i> <i>Aug. 10-June 30.</i></p> <p style="text-align: center;"><i>(i) Unit specific regulations:</i></p> <p style="text-align: center;"><i>(A) You may use bait to hunt black and brown bear between April 15 and June 30; you may use bait to hunt wolves on FWS and BLM lands.</i></p>
OSM Preliminary Conclusion	Defer
Southcentral Regional Advisory Council Recommendation	

WP16–18 Executive Summary	
Eastern Interior Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	1 Support, 2 Oppose

**DRAFT STAFF ANALYSIS
WP16-18**

ISSUES

Proposal WP16-18, submitted by the Wrangell-St. Elias National Park Subsistence Resource Commission, requests that brown bears be allowed to be hunted over bait in Units 11 and 12 with a season from Apr. 15-June 15 and Apr. 15-June 30, respectively.

DISCUSSION

The proponent claims that the proposed changes would increase harvest opportunity for rural residents in the spring, particularly in heavily forested areas where brown bears do not concentrate.

Existing Federal Regulation

§ __.26 (b) *Except for special provision found at paragraph (n)(1) through (26) of this section, the following methods and means of taking wildlife for subsistence uses are prohibited:*

* * * *

(14) Using bait for taking ungulates, bear, wolf, or wolverine; except you may use bait to take wolves and wolverine with a trapping license, and you may use bait to take black bears and brown bears with a hunting license as authorized in Unit-specific regulations at paragraphs (n)(1) through (26) of this section.

Unit 11—Brown Bears

1 bear *Aug. 10-June 15.*

(i) Unit specific regulations:

(A) You may use bait to hunt black bear between April 15 and June 15.

Unit 12—Brown Bears

1 bear *Aug. 10-June 30.*

(i) Unit specific regulations:

(A) You may use bait to hunt black bear between April 15 and June 30; you may use bait to hunt wolves on FWS and BLM lands.

Proposed Federal Regulation

§ __.26 (b) Except for special provision found at paragraph (n)(1) through (26) of this section, the following methods and means of taking wildlife for subsistence uses are prohibited:

* * * *

(14) Using bait for taking ungulates, bear, wolf, or wolverine; except you may use bait to take wolves and wolverine with a trapping license, and you may use bait to take black bears and brown bears with a hunting license as authorized in Unit-specific regulations at paragraphs (n)(1) through (26) of this section.

Unit 11—Brown Bears

1 bear

Aug. 10-June 15.

(i) *Unit specific regulations:*

(A) *You may use bait to hunt black **and brown** bear between April 15 and June 15.*

Unit 12—Brown Bears

1 bear

Aug. 10-June 30.

(i) *Unit specific regulations:*

(A) *You may use bait to hunt black **and brown** bear between April 15 and June 30; you may use bait to hunt wolves on FWS and BLM lands.*

Existing State Regulation

In Units 7, 11, 12, 13*, 14B*, 15, 16, 20A, 20B, 20C, 20E, 21D, 24C, 24D, and 25D brown/grizzly bears may be taken at a black bear bait station subject to the same restrictions as black bear. Hunters who take brown bears over bait in these areas are required to salvage the edible meat in addition to the hide and skull. Hunters must comply with seasons, bag limits, and sealing requirements for brown/grizzly bears (registration permits and locking tags may be required in some areas, contact ADF&G for details).*

**Units 11, 13, and 14B were opened to brown bear baiting by the Board of Game in 2015, effective July 1, 2015.*

Apr. 15 – June 30

Unit 11—Brown Bears

Residents and Nonresidents—1 bear every regulatory year.

Aug. 10-Jun 15

Unit 12—Brown Bears

Residents and Nonresidents—1 bear every regulatory year.

Aug. 10-Jun 30

Extent of Federal Public Lands

Federal public lands comprise approximately 88% of Unit 11 and consist of 84.5% National Park Service (NPS) managed lands, 3.3% U.S. Forest Service (USFS) managed lands, and 0.1% Bureau of Land Management (BLM) managed lands (see **Unit Map 11**).

Federal public lands comprise approximately 61% of Unit 12 and consist of 48.2% NPS managed lands, 10.9% U.S. Fish and Wildlife Service (USFWS) managed lands, and 1.8% BLM managed lands (see **Unit Map 12**).

Customary and Traditional Use Determinations

Rural residents of Chistochina, Chitina, Copper Center, Gakona, Glennallen, Gulkana, Kenny Lake, Mentasta Lake, Slana, Tazlina, Tonsina, and Units 11 and 12 have a customary and traditional use determination for brown bear in Unit 11, north of the Sanford River.

Rural residents of Chistochina, Chitina, Copper Center, Gakona, Glennallen, Gulkana, Kenny Lake, Mentasta Lake, Nabesna Road (mileposts 25-46), Slana, Tazlina, Tok Cutoff Road (mileposts 79-110), Tonsina, and Unit 11 have a customary and traditional use determination for brown bear in Unit 11, remainder.

Rural residents of Unit 12, Dot Lake, Chistochina, Gakona, Mentasta Lake, and Slana have a customary and traditional use determination for brown bear in Unit 12.

Regulatory History

In 1990, the Federal Subsistence Board (Board) did not adopt State brown bear regulations for Units 11 and 12 as brown bears were not considered a subsistence resource. As a result, there were no Federal seasons for brown bears in Units 11 and 12 until the late 1990s.

In 1997, the Board adopted Proposal P97-23 with modification, giving residents of Unit 12 and Dot Lake a customary and traditional use determination for brown bear in Unit 12 and recognizing brown bears as a subsistence resource.

In 1998, the Board adopted Proposal P98-96 with modification, adding residents of Chistochina, Gakona, Mentasta Lake, and Slana to the customary and traditional use determination for brown bear in Unit 12.

In 1998, the Board also adopted Proposal P98-097, creating an Aug. 10 – June 30 brown bear season in Unit 12 with a harvest limit of 1 bear. This was done to allow communities in Unit 12 with a customary and traditional use determination to hunt brown bear under Federal regulations and to align Federal and State regulations as users could already hunt brown bear on most (non-National Park) Federal lands under State regulations. The Federal harvest limit and season for brown bear in Unit 12 has not been changed since.

Also in 1998, the Board adopted Proposal P98-22, which made a customary and traditional use determination for brown bears in Unit 11. Residents in Chistochina, Chitina, Copper Center, Gakona, Glennallen, Gulkana, Kenny Lake, Mentasta Lake, Tazlina, Tonsina, and Units 11 and 12 received a positive customary and traditional use determination in Unit 11, north of the Sanford River. Residents of Chistochina, Chitina, Copper Center, Gakona, Glennallen, Gulkana, Kenny Lake, Mentasta Lake, Tazlina, Tonsina, and Unit 11 received a positive customary and traditional use determination in Unit 11 remainder.

In 1999, the Board adopted Proposal P99-004, which requested a brown bear season in Unit 11 of Sept. 1 – May 31 with a harvest limit of 1 bear. Brown bear populations appeared healthy and the Proposal intended to provide harvest opportunity of a customary and traditional resource to Federally qualified subsistence users, and because users could already hunt portions of the unit under State regulations.

In 2003, the Board adopted Proposal WP03-13, which extended the brown bear season in Unit 11 from Sept. 1–May 31 to Aug. 10-June 15. This was done to align Federal and State regulations, to provide additional harvest opportunity for Federally qualified subsistence users, and because there were no conservation concerns.

In 2012, the Alaska Board of Game adopted Proposal 196, allowing brown bears to be taken at bait stations in Unit 12. This was done to allow more opportunity to harvest brown bear as take of brown bears in Unit 12 was consistently below sustainable harvest levels (ADF&G 2012).

In 2013, the NPS adopted temporary restrictions under the Wrangell-St. Elias National Park and Preserve (NPP) compendium on taking brown bears over bait in National Preserves under the new State regulations to avoid public safety issues and to avoid food conditioning bears. These temporary restrictions were adopted again in 2014 and 2015. Consequently, the State provision allowing the take of brown bears over bait in Unit 12 has not gone into effect on National Preserve lands (Wrangell-St. Elias National Preserve, NPS 2015).

In 2015, the State adopted Proposal 93, allowing brown bears to be taken at bait stations in Unit 11, effective July 1, 2015. This was done to provide users additional opportunity and because there are no biological concerns for brown bears in Unit 11 (ADF&G 2015a).

The NPS temporary restrictions implemented in 2015 also apply to Unit 11. Therefore, National Preserve lands in Unit 11 (Wrangell-St. Elias National Preserve) are not open to the take of brown bears over bait under State regulations.

Current Events

The National Park Service proposed to permanently restrict the take of brown bears over bait under State regulations on National Preserves under National Park Service regulations in 2014 (NPS 2015).

The National Wildlife Refuge System (NWRS) is currently reviewing proposed changes to NWRS regulations, including the prohibition of the take of brown bears over bait under State general hunting and trapping regulations. These proposed changes are in the scoping phase of formal rulemaking. These changes would not affect Federal subsistence regulations (USFWS 2015).

Biological Background

State management objectives for Unit 11 brown bears are as follows (Schwanke 2011).

- Provide maximum opportunity to hunt brown bears in Unit 11.

State management goals and objectives for Unit 12 brown bears are as follows (Bentzen 2011):

- Maintain the brown/grizzly bear population and its habitat in concert with other components of the ecosystem.
- Provide the greatest sustained opportunity to hunt brown/grizzly bears in Unit 12.
- Manage harvests so 3-year mean harvest does not exceed 28 bears and includes at least 55% males in the harvest.

No formal brown bear population estimates have been conducted for Unit 11, although frequent observations by Alaska Department of Fish and Game (ADF&G) staff and the public suggest an abundant

and well-distributed population (Schwanke 2011). Frequent sightings of sows with cubs suggest good productivity in this unit as well.

In 2000, the brown bear population in Unit 12 was estimated at 350-425 bears and has likely remained unchanged since then. Based on harvest, productivity appears adequate (Bentzen 2011).

Habitat

Unit 11 is generally considered good brown bear habitat due to the variety of habitats, prevalence of salmon streams and ungulates, and large tracts of undeveloped land (Schwanke 2011). Brown bears inhabit all of Unit 11, except the high-elevation glaciers.

Habitat in Unit 12 is considered of moderate quality for brown bears. Habitat is relatively undisturbed, but streams do not contain reliable seasonal salmon runs. Wildfires and timber harvest projects in Unit 12 are expected to enhance brown bear habitat over the long-term (Bentzen 2011).

Harvest History

Brown bear harvest in Unit 11 averaged 16 bears annually through the 1960s and 1970s, but declined substantially after 1980 when Wrangell-St. Elias National Park and Preserve were established, closing much of the unit to brown bear harvest. Harvest increased after 1999, when a Federal brown bear season was established for Unit 11, opening the park to subsistence brown bear hunting. However, overall harvest remains low compared to adjacent areas with similar habitat (i.e. Unit 13, Schwanke 2011). Between 2005 and 2013, harvest ranged from 13-26 bears/year, with an average annual harvest of 17.3 bears (Schwanke 2011, Faulise 2015, ADF&G 2015b, **Figure 1**).

Brown bear harvest rates for Unit 12 are within State management objectives. Between 1996 and 2013, harvest of brown bears in Unit 12 ranged from 8-33 bears/year, with an average annual harvest of 18.7 bears (Bentzen 2011, Faulise 2015, **Figure 2**). The 3 year mean harvest of male bears in Unit 12 was within State management objectives for 14 out of 16 years (1998-2013), and ranged from 53-69%, with an average annual harvest of 60% males (Bentzen 2011, Faulise 2015, **Figure 3**).

In 2012, the State legalized take of brown bear over bait in Unit 12. The following spring (2013), the number of bear bait stations in Unit 12 increased to 89 from an 11 year average of 50 bait stations/year between regulatory years 2000/01 and 2011/12 (ADF&G 2014). Brown bear harvest in 2012/13 and 2013/14 was above the 18-year average, but down from 2011/12 harvests (Faulise 2015, **Figure 2**). Research, defense of life or property, and other human-related, non-hunting accidents comprised a small percentage of brown bear mortalities in this unit (0-3 bears per year) (Bentzen 2011).

Non-locals and non-residents have historically harvested most of the brown bears in Units 11 and 12. From 2005/06 to 2009/10, local residents accounted for 6-31% of the annual brown bear harvest (1-5

bears/year) in Unit 11 (Schwanke 2011). From 2005/06 to 2010/11, local residents accounted for 6-36% of the annual brown bear harvest (1-4 bears/year) in Unit 12 (Bentzen 2011).

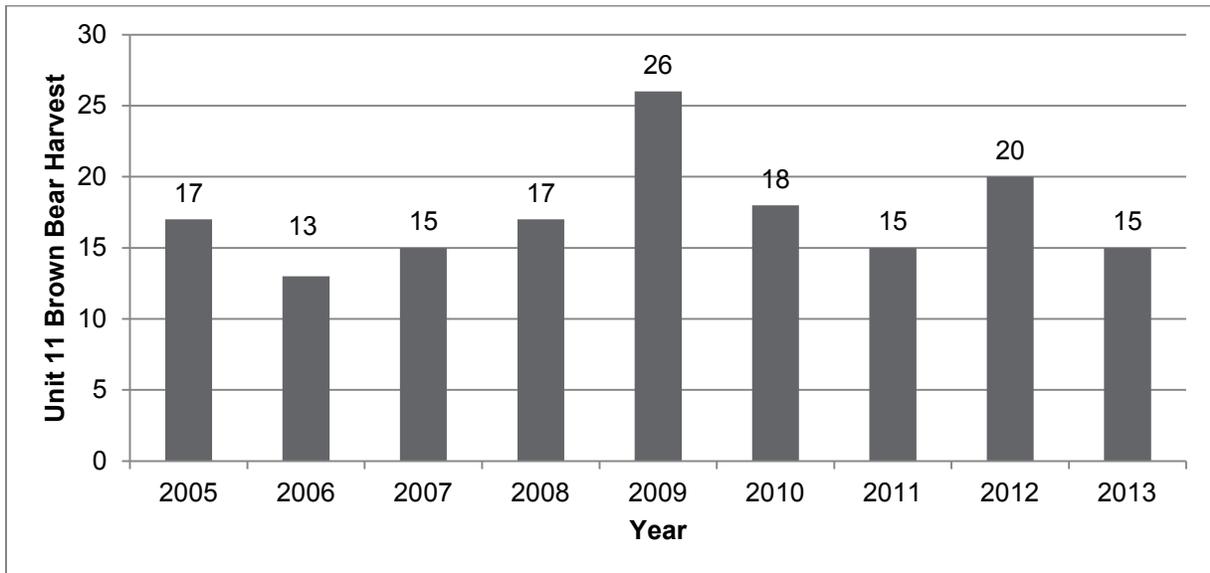


Figure 1. Unit 11 brown bear harvest, 2005-2013. (2005-2009 data is from Schwanke 2011. 2010-2013 data is from Faulise 2015, pers. comm.)

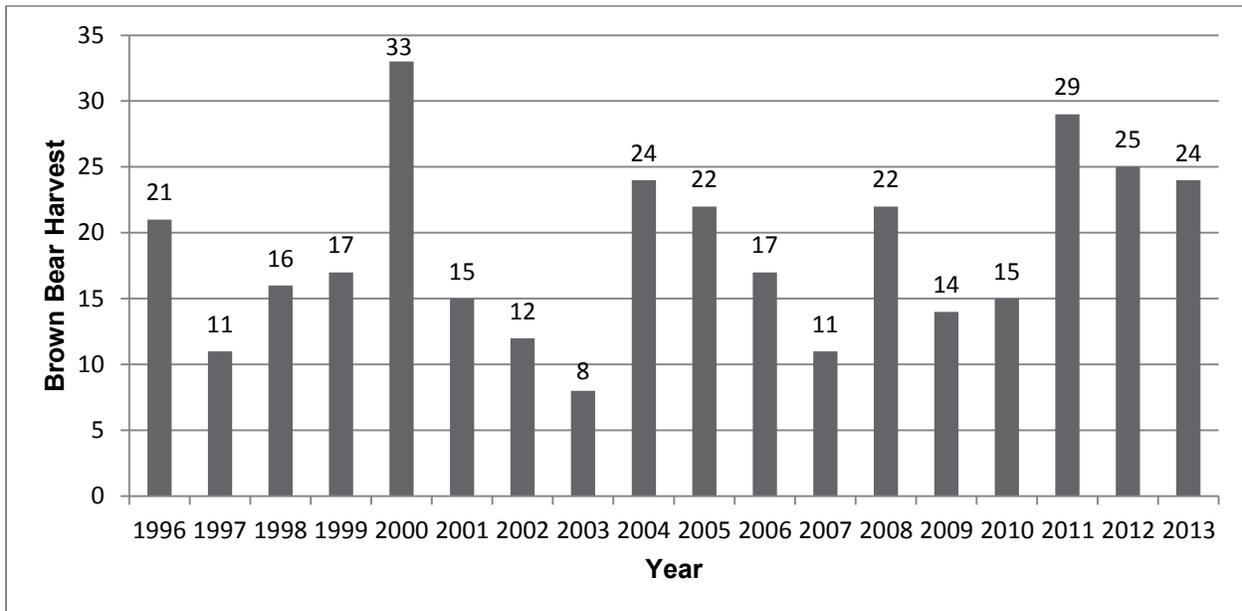


Figure 2. Unit 12 brown bear harvest, 1996-2013. (1996-2009 data is from Bentzen 2011. 2010-2013 data is from Faulise 2015, pers. comm.)

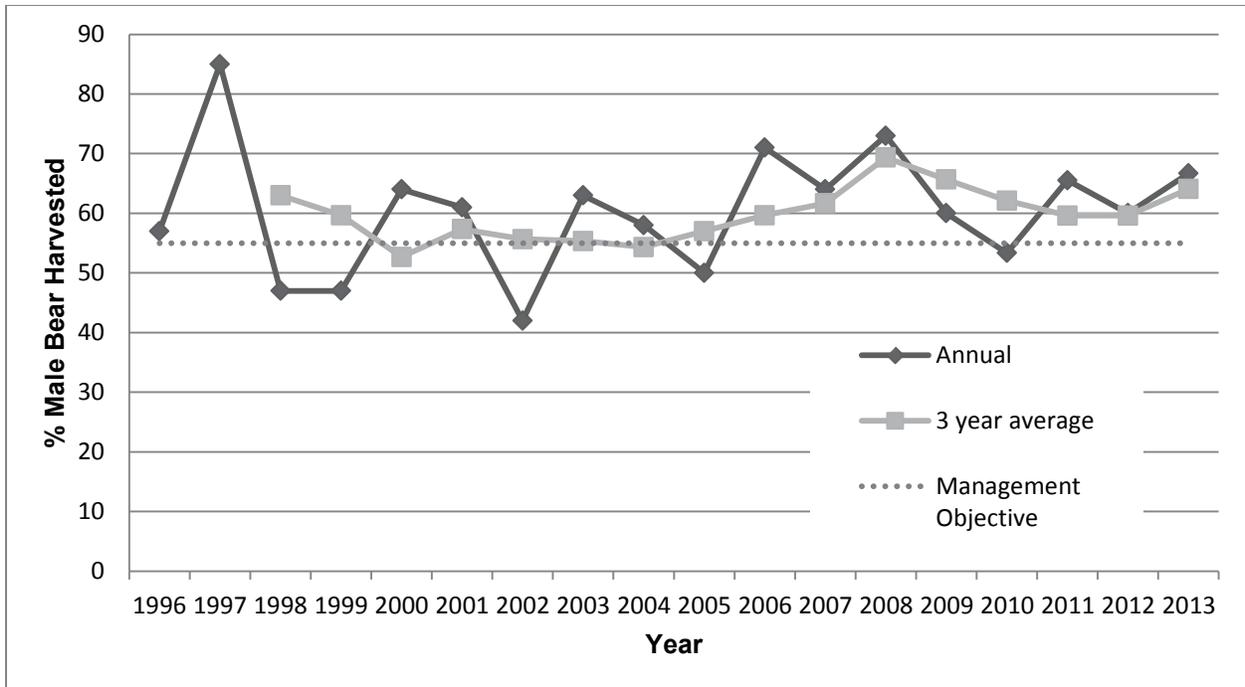


Figure 3. Percent of male bears harvested in Unit 12, 1996-2013 (1996-2009 data is from Bentzen 2011. 2010-2013 data is from Faulise 2015, pers. comm.)

Effects of the Proposal

Adopting this proposal would enable Federally qualified subsistence users to take brown bears over bait in Unit 11 from Apr. 15-June 15 and in Unit 12 from Apr. 15-June 30, providing additional harvest opportunities.

Adoption of this proposal may affect brown bear populations in both units. Baiting is considered a more efficient harvest strategy than the traditional “spot and stalk” method, particularly in forested areas where brown bears do not concentrate (Dunkley and Cattet 2003, OSM 2014). While brown bears can already be harvested over bait on BLM, USFS and FWS managed lands under State regulations, adopting this proposal would open Wrangell-St. Elias National Park and Preserve (NPP) lands to brown bear baiting by Federally qualified subsistence users, which may increase the brown bear harvest in Units 11 and 12.

Local residents comprise a minority of the brown bear harvests in Units 11 and 12. Additionally, brown bear harvest data indicate that the number of bears harvested in Unit 12 did not increase substantially following the allowance of brown bear baiting under State regulations. Due to these reasons, any increase in harvest resulting from opening Wrangell-St. Elias NPP to take of brown bears over bait is expected to be small.

Baiting may also result in food conditioned bears, raising concerns about public safety (Dunkley and Cattet 2003, NPS 2015). However, as brown bears have been feeding at black bear baiting stations for years, no increased threat to public safety is expected.

OSM PRELIMINARY CONCLUSION

Defer Proposal WP16-18

Justification

The NPS has concerns about conditioning bears to human foods at bait stations. Not all bears feeding at bait stations are harvested, so bears not harvested can become conditioned to human foods and contribute to safety concerns for local residents and/or the recreating public. The NPS is currently considering whether hunting brown bears over bait is an acceptable activity on NPS managed lands. Accordingly, the NPS recommends that Federal Subsistence Board defer this proposal until the NPS has an opportunity to consider this use not only in the context of biological effects and human safety considerations, but also the legal and policy framework for Alaska's park system areas.

Additionally, in the absence of recent population estimates and good information about sustainable harvest levels, a conservative approach is warranted prior to authorizing more efficient methods of harvest such as baiting.

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WRITTEN PUBLIC COMMENTS

May 27, 2015

Office of Subsistence Management
Attn: Regulations Specialist
1011 East Tudor Road, Mail Stop 121
Anchorage, Alaska 99503

Reference: WP16-18

To whom it may concern:

An ongoing issue of concern and public education in Alaska has been conditioning bears to “attractants” like fish waste, unsecured garbage and freezers that might attract bears to homes, businesses, and recreation areas which could result in bear-human conflicts.

The public safety concerns posed by food conditioned bears are universally recognized by natural resource agencies throughout the range of the species. Food conditioned bears are more likely to be a danger to humans than those that are not food conditioned. Further, food conditioning of bears tends to increase the likelihood of a bear being killed in defense of life or property. Baiting is incongruent with best management practices and standard public educational messaging on the issue of food and bears.

Conservation concerns must be given a priority over the simplification of hunting regulations, listed below some of these concerns:

1. I was unable to locate any current brown bear population data for the GMUs in the Proposal.
2. Brown bears have a very low reproductive rate, warranting scientific concern for potential over harvest, particularly when baseline data is unknown or anecdotal.
3. The Board of Game liberalized brown bear regulations in 2003 to increase the harvest of bears in GMU 11 to benefit ungulate populations.

D. Bachrach

WP16-18 Comments

Page 1 of 2

4. The State of Alaska already allows brown bear baiting in GMU 12 largely to benefit ungulate populations. To align with the state in this regard is in violation of the Federal Subsistence Board predator management policy.

This regulation is also inconsistent with the NPS and USFWS current and proposed rules prohibiting the taking of brown bears over bait on federal lands.

Passing this proposal will not affect subsistence use, as there is ample opportunity to hunt brown bears on federal lands in these GMUs.

I ask that you to oppose WP16-18.

Thank you for considering my comments.

Sincerely,

Dave Bachrach
Homer, AK



Matuskowitz, Theo <theo_matuskowitz@fws.gov>

Fwd: Letter supporting FSB proposal WP 16-70

1 message

AK Subsistence, FW7 <subsistence@fws.gov>

Tue, Jun 9, 2015 at 12:21 PM

To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

----- Forwarded message -----

From: **Derek Stonorov** <dstonorov@gmail.com>

Date: Tue, Jun 9, 2015 at 12:18 PM

Subject: Letter supporting FSB proposal WP 16-70

To: subsistence@fws.gov

To: Federal Subsistence Board

From: Derek Stonorov P.O. Box 15005, Fritz Creek, Alaska 99603

Subject: Letter of support for FSB proposal WP 16-70.

Please do support WP 16-70 to change the brown bear baiting regulations in YFNWR.
Please do not support WP 16-18 to allow brown bear baiting in GMU Units 10 and 11.

Brown bear baiting—or any bear baiting for that matter—sets a dangerous precedent for wildlife management, especially on federal lands. Bear baiting increases hunter efficiency and can most certainly can lead to over harvest.

A discussion of brown bear baiting in any context other than predator control is a waste of the FSB time.

Brown bear populations in GMUs 10 and 11 as well as the YFNWR are certainly not known and what little data available is 20-30 years old and it is very doubtful that the methods used by ADF&G for making these estimates would stand up to peer review.

I have lived and hunted in Alaska for more than 50 years. I am a wildlife biologist and served on the Homer Fish and Game Advisory Committee for many years.

Thank you for your time,

Derek Stonorov



May 27, 2015

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

RE: 2016-2018 Wildlife Proposals

Dear Mr. Matuskowitz:

Enclosed is Ahtna Tene Nene' Customary & Traditional Use Committee's comments on the 2016-2018 wildlife proposals.

Sincerely,

*Shoria Stickwan
for Roy S. Ewan*

Roy S. Ewan,
Chair

WP16-18 Allowing Bait To Hunt Brown Bear In Unit 11 And Unit 12

Comments:

We support WP16-18 to allow federally qualified hunters to use bait in Unit 11 and Unit 12 to hunt brown bear. In Unit 11 allow bait to hunt brown bear between April 15 and June 15, and in Unit 12 allow bait to hunt brown bear from April 15 and June 30.

Taking bears over bait has been and still is a method to harvest black and brown bears in the Copper Basin communities. Ahtna People customarily and traditionally used snares to kill bears to protect drying salmon on fish racks. Opportunistically harvesting brown and black bears occurred to feed families. Some Ahtna people ate brown bears and others did not. Brown bears' meat was consumed, meat was boiled or fried, hides were used for clothing, such as gloves, mattresses in tents, mukluks, claws were used as jewelry or neck laces, bladder was used as windows, fat was used as heating source and for lighting in dwellings.

There isn't a conservation concern for black or brown bears in Unit 11 and Unit 12. Harvesting a few bears in areas across the Copper River, in forested areas, will help to keep the natural abundance and diversity of wildlife in population within balance.

WP16-19 Executive Summary	
General Description	Proposal WP16-19 requests permission to harvest either 1 bull moose or 2 caribou between Jul. 15 and Aug. 31 by Federal registration permit for the Ahtna Heritage Foundation’s Culture Camp. <i>Submitted by the Ahtna Heritage Foundation.</i>
Proposed Regulation	(C) Upon written request from the Ahtna Heritage Foundation to the Glennallen BLM Field Office, either 1 bull moose or 2 caribou, sex to be determined by the Glennallen Field Office Manager, may be taken from August 1 – September 20 July 15 – August 31 for 1 moose or August 10 – September 20 July 15 – August 31 for 2 caribou by Federal registration permit for the Ahtna Heritage Foundation’s culture camp. The permit will expire on September 20 or when the camp closes, whichever comes first. Hunting efforts are to cease when the camp event ends. No combination of caribou and moose is allowed. The animals may be taken by any Federally qualified hunter designated by the Camp Director. The hunter must have in his/her their possession the permit and a designated hunter permit while hunting.
OSM Preliminary Conclusion	Support with modification to remove the Ahtna Heritage Culture Camp from Unit 13 specific regulations and delegate authority to the Bureau of Land Management to issue a permit directly to the Ahtna Heritage Foundation Culture Camp and coordinate decisions with all affected Federal and state land managers.
Southcentral Regional Advisory Council Recommendation	
Eastern Interior Regional Advisory Council Recommendation	
Interagency Staff Committee Comment	

WP16-19 Executive Summary	
ADF&G Comments	
Written Public Comments	None

**DRAFT STAFF ANALYSIS
WP16-19**

ISSUE

Proposal WP16-19, submitted by the Ahtna Heritage Foundation, requests permission to harvest either 1 bull moose or 2 caribou between Jul. 15 and Aug. 31 by Federal registration permit for the Ahtna Heritage Foundation's Culture Camp.

DISCUSSION

The proponent requests a modification of the current regulations for the Ahtna Heritage Foundation Culture Camp which would allow the culture camp designee the opportunity to harvest 1 bull moose or 2 caribou 16 days earlier than current regulations for Unit 13. The Culture Camp is usually held in July or August during a time when multiple subsistence harvest activities can occur simultaneously (e.g., fishing and berry picking) and when weather is mild and beneficial for the elders. The proponents claim that an early start for the hunting effort gives the participants greater opportunity, and increases the chance of success in the harvest of large game, something that has not happened during the two previous attempts.

Existing Federal Regulation

Unit 13

(iii) Unit-specific regulations

(C) Upon written request from the Ahtna Heritage Foundation to the Glennallen BLM Field Office, either 1 bull moose or 2 caribou, sex to be determined by the Glennallen Field Office Manager, may be taken from August 1 - September 20 for 1 moose or August 10 – September 20 for 2 caribou by Federal registration permit for the Ahtna Heritage Foundation's culture camp. The permit will expire on September 20 or when the camp closes, whichever comes first. No combination of caribou and moose is allowed. The animals may be taken by any Federally qualified hunter designated by the Camp Director. The hunter must have in his/her possession the permit and a designated hunter permit during all periods that are being hunted.

Proposed Federal Regulation

Unit 13

(iii) Unit-specific regulations

*(C) Upon written request from the Ahtna Heritage Foundation to the Glennallen BLM Field Office, either 1 bull moose or 2 caribou, sex to be determined by the Glennallen Field Office Manager, may be taken from ~~August 1–September 20~~ **July 15 – August 31** for 1 moose or ~~August 10–September 20~~ **July 15 – August 31** for 2 caribou by Federal registration permit for the Ahtna Heritage Foundation's culture camp. ~~The permit will expire on September 20 or when the camp closes, whichever comes first.~~ **Hunting efforts are to cease when the camp event ends.** No combination of caribou and moose is allowed. The animals may be taken by any Federally qualified hunter designated by the Camp Director. The hunter must have in ~~his/her~~ **their** possession the permit and a designated hunter permit while hunting.*

Other pertinent Federal Regulations

§ 100.25 (g) Cultural/educational program permits.

(1) A qualifying program must have instructors, enrolled students, minimum attendance requirements, and standards for successful completion of the course. Applications must be submitted to the Federal Subsistence Board through the Office of Subsistence Management and should be submitted 60 days prior to the earliest desired date of harvest. Harvest must be reported, and any animals harvested will count against any established Federal harvest quota for the area in which it is harvested.

(2) Requests for followup permits must be submitted to the in-season or local manager and should be submitted 60 days prior to the earliest desired date of harvest.

Extent of Federal Public Lands

Federal public lands comprise approximately 15% of Unit 13 and consist of 7% Bureau of Land Management (BLM) managed lands, 6% National Park Service (NPS) managed lands, and 2% U.S. Forest Service (USFS) managed lands (**Unit 13 Map**).

Customary and Traditional Use

Moose

Residents of Unit 13, as well as the residents of Chickaloon and Slana, have a customary and traditional use determination for moose in Units 13A and 13D.

Residents of Units 13 and 20D (excluding residents of Fort Greely), and Chickaloon and Slana have a customary and traditional use determination for moose in Unit 13B.

Residents of Units 12 and 13, Chickaloon, Healy Lake, Dot Lake, and Slana have a customary and traditional use determination for moose in Unit 13C.

Residents of Unit 13, Chickaloon, McKinley Village, Slana, and the area along the Parks Highway between mileposts 216 and 239 (excluding residents of Denali National Park Headquarters), have a customary and traditional use determination for moose in Unit 13E.

Caribou

Residents of Units 11, 12 (along the Nabesna Road and Tok Cutoff Road, mileposts 79-110), 13, 20D (excluding residents of Fort Greely), and Chickaloon have a customary and traditional use determination for caribou in Unit 13B.

Residents of Units 11, 12 (along the Nabesna Road and Tok Cutoff Road, mileposts 79 - 110), 13, Chickaloon, Dot Lake, and Healy Lake, have a customary and traditional use determination for caribou in Unit 13C.

Residents of Units 11, 12 (along the Nabesna Road), 13, and Chickaloon, have a customary and traditional use determination for caribou in Unit 13A and Unit 13D.

Residents of Unit 11, 12 (along the Nabesna Road), 13, Chickaloon, McKinley Village, and the area along the Parks Highway between mileposts 216 and 239 (excluding residents of Denali National Park headquarters), have a customary and traditional use determination for caribou in Unit 13E.

Under the guidelines of the Alaska National Interests Lands Conservation Act (ANILCA), National Park Service regulations identify qualified local rural residents in National Parks and National Monuments by: (1) identifying Resident Zone Communities, which includes a significant concentration of people who have customarily and traditionally used subsistence resources on park lands; and (2) identifying and issuing subsistence use (13.440) permits to individuals residing outside of the Resident Zone Communities who have a personal or family history of subsistence use.

Regulatory History

Title VIII of ANILCA and its implementing regulations recognize that subsistence use of wildlife consists of more than the act of harvesting. The Federal Subsistence Board (Board) is authorized to permit the taking of fish and wildlife for special purposes [*§ 10(d)(5)(iii)*]. Cultural and educational subsistence activities have been recognized through Special Actions or unit-specific Special Provisions.

In May 2004, the Board adopted Proposal WP04-26, establishing the current unit-specific regulation that allows the Glennallen BLM Field Office Manager to issue permits to the Ahtna Heritage Foundation Culture Camp director for either one bull moose (Aug. 1 – Sept. 20) or two caribou (sex to be determined by the Manager) (Aug. 10 – Sept. 20).

By 2010, the process for issuing harvest permits state-wide for cultural and educational programs had gone through a number of changes, not all well documented. WP10-03 requested the addition of a general provision in Federal subsistence management regulations to allow the harvest of fish and wildlife by participants in a cultural or educational program. The Board adopted the proposal with unanimous support from all Regional Advisory Councils, creating Federal regulation § 100.25 (g). This regulation allows a culture camp or education program to deal directly with the land manager by delegated authority on an annual basis once an initial permit is approved.

In January of 2012, the Board adopted Proposal WP12-25, which extended the caribou season in Unit 13 for an additional nine days from Aug. 10 – Sep. 30 to Aug. 1 – Sep. 30, aligning the caribou and moose seasons and effectively spreading out hunter effort. To date, the Ahtna Heritage Foundation Culture Camp Special Provision regulation has not been updated to align with the change in caribou season.

Prior to the adoption of the unit-specific regulation, the Ahtna Culture Camp had been issued two permits for moose hunts through special actions: WS00-01 for one moose in Unit 13A, B, C, and D, approved July 5, 2000; and SW01-06 for one moose in Unit 11, approved July 12, 2001. No harvest was reported for either hunt. Since the adoption of the unit-specific regulation, records indicate the Ahtna Culture Camp was issued permits to hunt for moose and caribou in 2005 and 2013. The harvest reports for both years indicate that no animals were harvested (FWS 2015).

Educational/Cultural Program Activities

The Ahtna Heritage Foundation Culture Camp has taken place on an annual basis in July or August since 1989. The camp consists of the following components: fish cutting and handling; beadwork and skin sewing; hunting; food preparation; use of the sweat bath; and storytelling. Instructors are selected on the basis of their knowledge and experience. Fifty to 75 individuals participate in camp activities on an annual basis and there are typically 10 to 12 instructors. The duration of the camp is 3-4 days and participants attend all camp activities. The camp's focus is on hands-on activities, most of which are designed with a

product (food and crafts) as an end goal. Participant success is measured through participation and evaluation by the instructors (Stickwan 2003, pers. comm.). In the WP04-26 proposal request, the proponents stated that traditional methods are taught with the goal of providing interaction between elders and youth to facilitate the transfer of Ahtna customs and traditions.

Cultural Knowledge and Traditional Practices

References to the harvest and use of moose and caribou by Ahtna Athabascans begin as early as the late 1800s and continue to the present day. Members of H. T. Allen's 1884 Copper River expedition documented the drying of meat by the Ahtna when they passed through the area (Allen 1889). The traditional practices of drying and smoking meat, as well as the proper and respectful treatment of harvested resources including moose and caribou, are described in several ethnographic accounts of the Ahtna (de Laguna and McClellan 1981; Mishler et al. 1988; Reckord 1983). In recent comprehensive subsistence surveys, it has been noted that while salmon composed a majority of the community harvest in most villages lining the upper Copper River, large land mammal harvest is high and in some communities surpassed that of fish (Kukkonen & Zimpleman 2012; La Vine, et al. 2013; La Vine & Zimpleman 2014). An ethnographic study of contemporary subsistence fishing in the Copper River Basin highlighted the significance of moose and caribou to residents' diets and cultural practices. Many of the study's participants reported that they valued the fall hunt as a cultural institution as much or more than fish camp and almost all, if offered a choice, stated that they would choose shared meat over shared fish (McCall-Valentine & La Vine 2014). The knowledge and skills associated with moose and caribou harvesting have traditionally been passed on to children by the older generation. Present day culture camps have been identified as tools for teaching the young and to "heal" contemporary problems faced by adults (Simeone 1995).

Biological Background

Caribou

The Nelchina Caribou Herd (NCH) population in Unit 13 has fluctuated widely since the 1940s. The population was estimated to be between 5,000–15,000 in the 1940s, 70,000 in the mid-1960s, 7,000–10,000 in 1972, and 50,000 in 1995. The increase in population between the 1940s and the 1960s was due in part to intensive predator control by the Federal government through the late 1950s and then public involvement in aerial shooting in the 1960s until the passage of the Federal Airborne Hunting Action in 1972 (Schwanke 2011, ADF&G 2002).

State management goals and objectives for NCH are as follows (Schwanke 2011):

- Maintain a fall population of 35,000–40,000 caribou, with a minimum of 40 bulls:100 cows and 40 calves:100 cows.
- Provide for the annual harvest of 3,000–6,000 caribou.

From 2001 to 2010, fall population estimates for the NCH have remained relatively stable with an estimated herd size between 30,000-44,000 animals. In June 2007, a post-calving survey estimated the NCH to be approximately 32,569 caribou (ADF&G 2008). The population was estimated at 33,146 and 44,954 caribou in 2009 and 2010 respectively (ADF&G 2009, ADF&G 2010).

Historically, the productivity and recruitment for the NCH has been high with an average of 52 calves:100 cows (1985-1996). The annual harvestable surplus of Nelchina caribou is dependent on productivity and survival of calves, which is determined from June and October biological surveys conducted by the Alaska Department of Fish and Game (ADF&G 2010). From 2001–2010 there was an average of 42 calves:100 cows, which is above State management goals (Toby and Kellyhouse 2007, ADF&G 2008, Schwanke 2011). During 2010, an average of 55 calves:100 cows were counted during the fall composition surveys (Schwanke 2011) .

Between 2001 and 2008, the bull:cow ratio was below the State management objective with an average of 32 bulls:100 cows. The lowest ratio of 23 bulls:100 cows was in 2006-2007. From 2008 to 2010, the average bull:cow ratio increased to 38 bulls:100 cows.

Winter habitat for the NCH ranges from northern Unit 13 to Unit 20E. Winter range in Unit 20E is generally considered high quality due to high lichen biomass as a result of old burns (>50 years) (Dale 2000, Joly et al. 2003). In 2004, a large proportion of NCH winter range in Unit 20E burned. Many caribou still winter in Unit 20E, although caribou now utilize adjacent unburned areas. Winter distribution for the NCH in 2006 extended into Unit 13E, across 13A and 13B, and northeast into Units 11, 12 and 20E (Tobey and Kelleyhouse 2007). In some years, a small number of caribou winter in Unit 13D and have been observed as far south as the Edgerton Highway. The eastern Talkeetna Mountains, from the Fog Lakes southeast to the Little Nelchina River, is the typical calving area for the NCH with the core calving area extending from the Little Nelchina River north to Kosina Creek (Tobey and Kelleyhouse 2007).

Moose

In the early 1900s, moose densities in Unit 13 were low but increased gradually until peaking in the mid-1960s. The population then declined due to a combination of factors including overhunting, severe winters, and predation. The population reached a low in 1975 and then started to increase by 1978, reaching a second peak in 1987. From 1987-2001, the moose population declined by an estimated 47% (Tobey and Schwanke 2008, 2010).

State management goals and objectives for moose in Unit 13 are as follows (Tobey and Schwanke 2010):

- Increase the Unit 13 moose population to 20,000 to 30,000 moose with a minimum of:
 - 25–30 calves:100 cows.
 - 25 bulls:100 cows

- 10 yearling bulls:100 cows
- Provide for a total annual harvest of 1,200–2000 moose and a subsistence harvest of 300–600 moose per year.

ADF&G conducts fall counts to determine the sex and age composition and population trends in large count areas distributed throughout Unit 13. From 2001–2009 the number of moose observed in Unit 13 during the fall increased from 3,466 to 4,481 moose. Although the bull:cow and yearling bull:cow ratios increased with the population increases between 2001–2008, the calf:cow ratios were below the management objective.

Moose are most abundant along the southern slopes of the Alaska Range and within Units 13B and 13C, and also within Unit 13A on the eastern Talkeetna Mountains and it is within these subunits of Unit 13 that moose numbers have seen the greatest increase. Moose typically congregate in subalpine habitats during the fall rut and move down to lower elevations as the snow increases. From 2001–2009 the bull:cow ratio was close or exceeded management objectives, whereas the yearling:cow and calf:cow ratios were below management objectives (Tobey and Schwanke 2010).

Harvest History

Participation rates in the Federal hunts of moose and caribou from 2004-2005 have been high while harvest success has been modest (**Table 1 and Table 2**). An average of 2,683 Federal caribou permits were issued during 2004-2013, with, with an average of 1,360 permits being reportedly used for hunting. Harvest success has fluctuated annually, with reported harvests ranging from 273 to 610 caribou from year to year, averaging 418 animals over the 10-year period. Over the same period, an average of 1,121 moose permits were issued annually, with an average of 578 permits being reportedly used for hunting. Reported harvest ranged from 47 to 80 moose each year.

Table 1. Federal caribou harvest in Unit 13, 2004-2013 (OSM 2015).

Reg. Year	Species	Permits Issued	Hunted	Harvest Total
2004	Caribou	2,555	1,337	335
2005	Caribou	2,557	1,499	610
2006	Caribou	2,631	1,317	570
2007	Caribou	2,403	1,094	385
2008	Caribou	2,532	1,229	273
2009	Caribou	2,576	1,339	349
2010	Caribou	2,852	1,535	451
2011	Caribou	2,980	1,425	395
2012	Caribou	2,953	1,518	537
2013	Caribou	2,789	1,305	279
10 Yr Average		2,683	1,360	418

Table 2. Federal moose harvest in Unit 13, 2004-2013 (OSM 2015).

Reg. Year	Species	Permits Issued	Permits Hunted	Total Harvest
2004	Moose	1,050	553	49
2005	Moose	936	562	51
2006	Moose	1,071	506	47
2007	Moose	937	441	53
2008	Moose	1,125	559	57
2009	Moose	1,094	631	61
2010	Moose	1,172	669	77
2011	Moose	1,327	680	80
2012	Moose	1,292	645	59
2013	Moose	1,205	534	50
10 Yr Average		1,121	578	58

Effects of the Proposal

If adopted, this proposal would extend the potential dates for the Ahtna Heritage Foundation Culture Camp moose or caribou harvest that is currently authorized in regulation. Regulations allow for this harvest to occur during the existing Unit 13 Federal seasons for moose and 10 days later than the current season for caribou. This proposal would allow the culture camp harvest to occur outside the existing Unit 13 harvest seasons. The proponents state that allowing for an early hunt outside current seasons would not only provide greater likelihood of culture camp harvest success, but ensure the safety of youth participants moving through the landscape with less concern for other hunters (McConkey 2015, pers. comm.).

BLM staff (Teitzel 2015, pers. comm.) agree that allowing for the opportunity of an early harvest by the Ahtna Heritage Foundation Culture Camp would be a small deviation from the current practice. In addition, the harvest of one antlered bull moose or 2 caribou would not be biologically significant.

OSM PRELIMINARY CONCLUSION

Support Proposal WP16-19 with modification to remove the Ahtna Heritage Culture Camp from Unit 13 specific regulations and delegate authority to the Bureau of Land Management to issue a permit directly to the Ahtna Heritage Foundation Culture Camp and coordinate decisions with all affected Federal and state land managers (**Appendix A**).

Justification

A culture camp permit exists for the Ahtna Heritage Foundation Culture Camp to harvest 1 bull moose or 2 caribou. The Ahtna Heritage Foundation Culture Camp was established prior to the establishment in

regulations of § ____.25 (g) Cultural/educational program permits. By removing the Ahtna Heritage Foundation Culture Camp from regulation and moving authorization by a letter of delegation to BLM, Ahtna can request a permit directly from the land manager on an annual basis outside of the regulatory process. This would allow both Ahtna and BLM staff to address fluctuating camp and harvest dates with greater flexibility. Finally, BLM staff state that allowing for the opportunity of an early harvest by the Ahtna Heritage Foundation Culture Camp would be a small deviation from the current practice and that the harvest of one antlered bull moose or 2 caribou would not be biologically significant.

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Appendix A

Dennis Teitzel, Field Manager
Bureau of Land Management
Glennallen Field Office
P.O. Box 147
Glennallen, AK 99588

Dear Field Manager:

This letter delegates regulatory authority from the Federal Subsistence Board (Board) to the Field Manager of the Bureau of Land Management (BLM) in Glennallen, to annually issue, subject to the guidelines for delegation, a Federal Cultural/Educational permit to a qualified rural resident to harvest either one bull moose or two caribou, on Federal public lands in Unit 13, as part of the Ahtna Heritage Foundation Culture Camp.

It is the intent of the Federal Subsistence Board that moose and caribou management by Federal officials be coordinated with the Alaska Department of Fish and Game and involve Regional Advisory Council representatives to conserve healthy populations while providing for subsistence uses. Federal managers are expected to cooperate with State wildlife managers and minimize disruption to resource users and existing agency programs, as agreed to under the Memorandum of Understanding for Coordinated Interagency Fish and Wildlife Management for Subsistence Uses on Federal Public lands in Alaska.

DELEGATION OF AUTHORITY

- 1. Delegation:** The Field Manager of the Bureau of Land Management Glennallen Field Office is hereby delegated authority to issue one annual Federal Cultural/Educational permits for the harvest of either one bull moose or two caribou on Federal lands as outlined under **Scope of Delegation** below.
- 2. Authority:** This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6), which state: “The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish and wildlife harvest seasons within frameworks established by the Board.”
- 3. Scope of Delegation:** The regulatory authority hereby delegated is limited to the authority to issue a Federal Cultural/Educational permit annually to the Ahtna Heritage Foundation to harvest either one bull moose or two caribou on Federal public lands in Unit 13 for its annual Culture Camp. This delegation may be exercised when such a permit is requested by Ahtna Heritage Foundation Culture Camp and only in compliance with the procedures outlined under Guidelines for Delegation.

All other permit requests from the Ahtna Heritage Foundation Culture Camp and all requests from other entities shall be directed to the Federal Subsistence Board.

The Federal lands subject to this delegated authority are those within Unit 13. You will coordinate your decisions with all affected Federal land managers and the Alaska Department of Fish and Game.

4. **Effective Period:** This delegation of authority is effective from the date of this letter, and continues until revoked by the Federal Subsistence Board.
5. **Guidelines for Delegation:** You will become familiar with the management history of moose and caribou in Unit 13, with the current State and Federal regulations and management plans, and be up-to-date on population and harvest status information. Following the receipt of the annual cultural/educational permit request from Ahtna Heritage Foundation Culture Camp to harvest either one bull moose or two caribou Federal public lands in Unit 13, you may approve the request and identify any appropriate limitations or stipulations, subsequent to completion of the following steps: a) Review the initial OSM staff analysis and the harvest report from the previous year; b) Consider the need for the permit based upon the hunter's success and use of the resource during the previous year; c) Consult with the local ADF&G wildlife manager and any other appropriate Federal land managers; d) Note any changes in resource conditions and identify any restrictions on harvest location, etc., needed to address possible conservation concerns; and e) Certify that the re-issuance of the permit will be consistent with principles of fish and wildlife management. You may not approve permits that exceed the number and species of animals initially approved by the Federal Subsistence Board. You may not approve a permit if a repeat permit has not been issued within the previous five years. You will issue timely decisions. Requests not within your delegated authority will be forwarded to the Federal Subsistence Board for consideration. You will keep a record of all permit requests and their disposition. Affected State and Federal wildlife managers, law enforcement personnel, and Regional Advisory Council representatives will be notified before the effective date/time of decisions.

You may defer a permit request to the Federal Subsistence Board in instances where the proposed action will have a significant impact on other Federal subsistence users. This option should be exercised judiciously and may only be initiated where sufficient time allows for it.

6. **Support Services:** This Cultural/Educational Permit may be accessed on the Federal Subsistence Permit System and administrative support for management activities will be provided by the Office of Subsistence Management, U.S. Fish & Wildlife Service, Department of the Interior.

This delegation of authority will assure conservation of wildlife populations through sound management decisions in cooperation with State managers, thereby providing for the long-term

needs of the subsistence user. If you have any questions, please contact Mr. Chuck Ardizzone, Assistant Regional Director for the Office of Subsistence Management at (907) 786-3888.

Sincerely,

Tim Towarak, Chair

cc: Gene Petola, Assistant Regional Director, Office of Subsistence Management
Chuck Ardizzone, Deputy Regional Director, Office of Subsistence Management
Donald Mike, Coordinator, Southcentral Alaska Subsistence Regional Advisory Council
Ralph Lhose, Chair, Southcentral Alaska Subsistence Regional Advisory Council
Sam Cotton, Commissioner, Alaska Department of Fish and Game
Federal Subsistence Liaison Team Leader, Alaska Department of Fish and Game
Federal Subsistence Board
Interagency Staff Committee
Alaska Wildlife Troopers, Northern Detachment
Administrative Record

WP16–20 Executive Summary	
General Description	Proposal WP16–20 requests that the harvest limit for sheep in Unit 11 be modified from 1 sheep to 1 ram with a $\frac{3}{4}$ curl horn or larger. <i>Submitted by Eastern Interior Alaska Subsistence Regional Advisory Council.</i>
Proposed Regulation	<p>Unit 11— Sheep</p> <p><i>1 sheep-ram with $\frac{3}{4}$ curl horn or larger</i> <i>Aug. 10 – Sept. 20</i></p> <p><i>1 sheep by Federal registration permit only by persons 60 years of age or older. Ewes accompanied by lambs or lambs may not be taken.</i> <i>Aug. 1 – Oct. 20</i></p>
OSM Preliminary Conclusion	Support
Southcentral Regional Advisory Council Recommendation	
Eastern Interior Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	1 Oppose

**DRAFT STAFF ANALYSIS
WP16-20**

ISSUES

Proposal WP16-20, submitted by Eastern Interior Alaska Subsistence Regional Advisory Council (Council), requests that the harvest limit for sheep in Unit 11 be modified from 1 sheep to 1 ram with a $\frac{3}{4}$ curl horn or larger.

DISCUSSION

The proponent states that the requested change is necessary to reduce hunting pressure on ewes and younger rams. The proponent feels that a conservative approach to sheep management is needed given recent declines in the sheep population, current low densities, and the relatively easy access from the road system in Unit 11. The proponent states that a harvest limit of 1 ram with $\frac{3}{4}$ curl or larger will still give Federally qualified subsistence users a meaningful priority over people hunting under State regulations; that this change would not pose an undue hardship on subsistence users; and would allow for the population to increase.

Existing Federal Regulation**Unit 11— Sheep**

1 sheep *Aug. 10 – Sept. 20*

1 sheep by Federal registration permit only by persons 60 years of age or older. Ewes accompanied by lambs or lambs may not be taken. *Aug. 1 – Oct. 20*

Proposed Federal Regulation**Unit 11— Sheep**

1 ~~sheep~~ ram with $\frac{3}{4}$ curl horn or larger *Aug. 10 – Sept. 20*

1 sheep by Federal registration permit only by persons 60 years of age or older. Ewes accompanied by lambs or lambs may not be taken. *Aug. 1 – Oct. 20*

Existing State Regulation*

Unit 11 - Sheep

*Residents and Nonresidents: One ram with full-curl
horn or larger.*

Aug. 10 – Sept. 20

Extent of Federal Public Lands

Federal public lands comprise approximately 88% of Unit 11 and consists of 84.5% National Park Service (NPS) managed lands, 3.3% U.S. Forest Service (USFS) managed lands, and 0.1% Bureau of Land Management (BLM) managed lands (See **Unit 11 Map**).

Customary and Traditional Use Determinations

In Unit 11, north of the Sanford River, residents of Unit 12 and the communities and areas of Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Glennallen, Gulkana, Healy Lake, Kenny Lake, Mentasta Lake, Slana, McCarthy/South Wrangell/South Park, Tazlina, and Tonsina; also residents along the Nabesna Road — milepost 0–46; and residents along the McCarthy Road — milepost 0–62 have a customary and traditional use determination for sheep.

In the remainder of Unit 11, Chistochina, Chitina, Copper Center, Gakona, Glennallen, Gulkana, Kenny Lake, Mentasta Lake, Slana, McCarthy/South Wrangell/South Park, Tazlina, and Tonsina; also residents along Tok Cutoff Road (mileposts 79–110 Mentasta Pass); the Nabesna Road (milepost 0–46); and residents along the McCarthy Road (milepost 0–62) have a customary and traditional use determination for sheep.

Under the guidelines of ANILCA, National Park Service regulations identify qualified local rural subsistence users in National Parks and Monuments by: 1) identifying resident zone communities which include a significant concentration of people who have customarily and traditionally used subsistence resources on park lands; and 2) identifying and issuing subsistence use (13.440) permits to individuals residing outside of the resident zone communities who have a personal or family history of subsistence use. In order to engage in subsistence in Wrangell St. Elias National Park, the National Park Service (WRST) requires that subsistence users either live within the park's resident zone (36 CFR 13.430, 36 CFR 13.1902) or have a subsistence permit (36 CFR 13.440) issued by the park superintendent.

Regulatory History

In 1998, the Federal Subsistence Board (Board) created a late sheep season in Unit 11 for persons 60 years of age or older. This season was extended one month beyond the regular sheep season, when sheep are at lower elevations to allow the opportunity for those “elders who are still capable of hunting, but cannot climb high enough into the mountain to find sheep during the early season, to continue to hunt and pass on traditional knowledge about sheep hunting to younger family members” (FWS 1998).

Due to declining sheep numbers, the State bag limit for resident hunters in 2001/2002 was changed from one sheep to one ram, and then in 2003/2004 to one ram with $\frac{3}{4}$ curl or larger. In 2011/2012, the State bag limit for both residents and nonresidents was changed to one ram with a full curl or larger.

In 2004, Proposal WP04-24 requested that designated hunting be allowed for the late season elder hunt in Unit 11. This proposal was opposed by the Southcentral Alaska and Eastern Interior Alaska Subsistence Regional Advisory Councils and rejected by the Board (FSB 2004). During consideration of WP04-24, there was discussion during both Council meetings regarding the opportunity for youth to accompany elders on hunts, but it was realized that the proposal under consideration dealt only with designated hunting provisions and there was a lack of detail about the provisions for allowing youth to accompany elders during the late sheep season (FWS 2004).

The Cheesh'na Tribal Council submitted Proposal WP05-06 with the goal of allowing elders to resume their traditional practices of teaching their grandchildren how to hunt sheep. The proponent stated that the existing regulation "neglects one aspect of the traditional instructional process, that the young people should have the opportunity to take the animal, rather than simply observing their elders doing so." WP05-06 was adopted by the Board at its May 2005 meeting and established the current elder/minor hunt with the season of Sept. 21 – Oct. 20 (FWS 2005). Under the provisions of the elder/minor hunt, a federal registration permit is issued to a pair of federally qualified subsistence users consisting of a youth between 8 and 15 years of age and an elder who is 60 years of age or older, and either the elder or the youth may harvest the sheep.

In 2012, the Board adopted Proposal WP12-32 with modification to change the harvest season dates for the Unit 11 elder hunt and the elder/minor hunt from Sept. 20 – Oct. 20 to Aug. 1 – Oct. 20 and prohibiting the take of lambs and ewes accompanied by lambs (FWS 2012).

Biological Background

Dall's sheep occur in most of the high alpine and subalpine areas in the Wrangell Mountains, which cross the Alaska–Canada border. Sheep population characteristics, densities, and morphology vary widely between populations in Unit 11 (Schwanke 2008, 2011). For example, sheep densities and population estimates are typically greater in the northern versus the southern portion of the range. Since 1973, when specific count areas (CA) and survey methods were established, aerial surveys to determine age and sex composition and sheep population trends have been conducted in selected trend count areas over large sections of the Wrangell and Chugach Mountains (**Figure 1**) (Schwanke 2011).

Sheep composition counts for select years (1981–2013) from aerial surveys conducted by the Alaska Department of Fish and Game (ADF&G) and Wrangell-St. Elias National Park and Preserve (WRST) within Unit 11 are presented in (**Appendix 1**). During the late 1980s and 1990s, sheep populations declined over much of the southern area of the Wrangell Mountains which includes Mount Drum southeast to the Canadian border (Strickland et al. 1993, Schwanke 2011). Based on the survey count areas, the overall sheep population in WRST has declined approximately 50% since the 1990s (**Table 1**). However the sheep populations in Unit 11 have remained fairly stable, although sheep numbers in some portions of the unit continue to be well below those observed in the 1980s and early 1990s (Table 1, Appendix 1).

Recent surveys indicate that the number of rams per 100 ewes was greater than 40 in 10 of the 11 sheep survey units surveyed in 2013 and 2014 (Appendix 1) (Putera 2015).

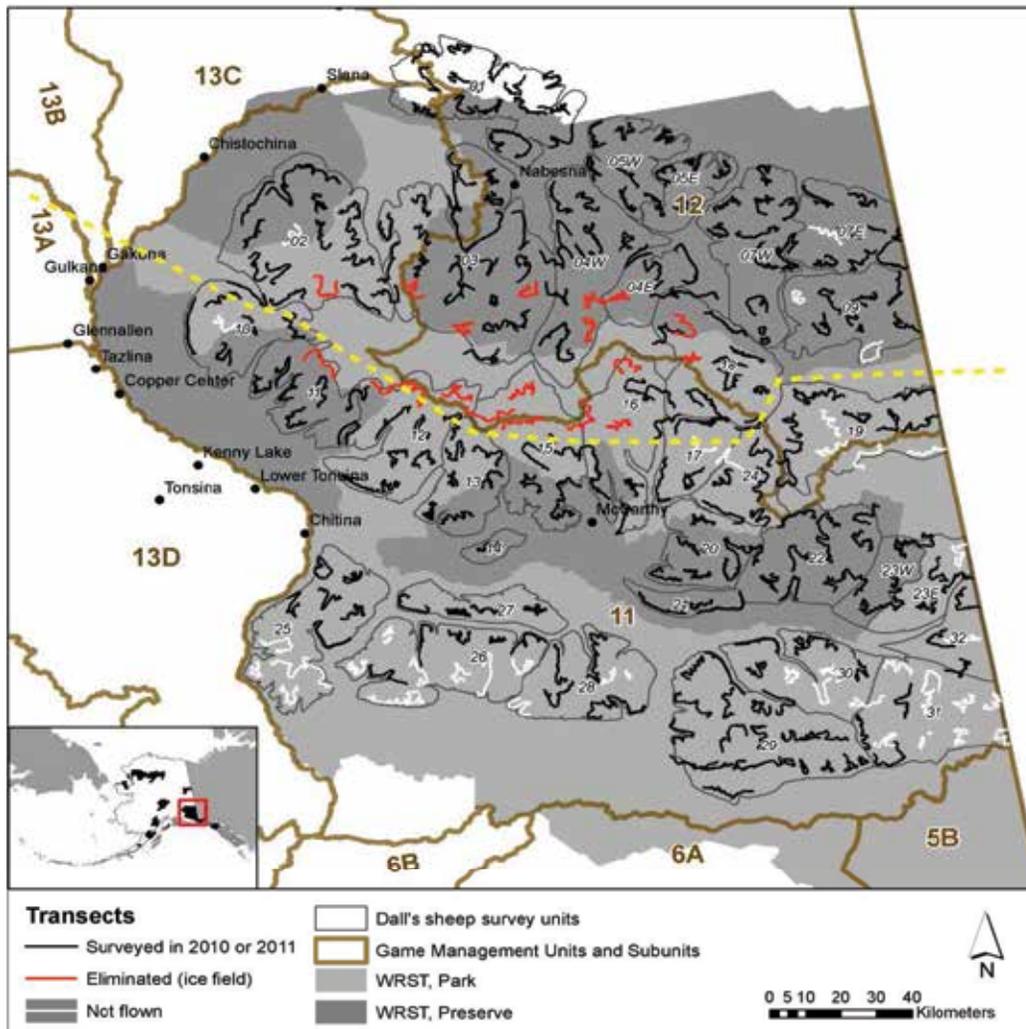


Figure 1. Game Management units, survey units (count areas) and transects used to survey Dall's sheep in Units 11 and 12 in Wrangell–St Elias National Park and Preserve in 2010 and 2011. (Putera 2013).

A brief summary by survey units and count areas are described below. CA3 West, in the north Wrangell Mountains within the Upper Copper River drainage, is located within WRST boundaries and is utilized by local subsistence hunters using four wheelers for access, making it a popular area to hunt. The sheep population in this area readily cross the Unit 11/12 boundary, thus making sheep trends in this area difficult to interpret. For example, the number of sheep observed dropped from 584 to 330 in CA3 between 2012 and 2103 although the number of rams: 100 ewes increased from 29 to 46 (**Appendix 1**) (Schwanke 2011, Putera 2015, pers. comm.). Ewes and rams increased from 2001–2012. Ewes and rams then decreased from 2012–2013, although the number of rams decreased only slightly (Schwanke 2011, Putera 2015, pers. comm.). The population was stable until 2012, although once again the results can be difficult to interpret

because the sheep move between Units 11 and 12. There are plans to survey the entire CA3 in 2015 (Putera 2105).

Table 1. Population estimates and composition of Dall's sheep in Wrangell–St. Elias National Park and Preserve. Distance sampling methods were used for the 201-2011 population estimates (Strickland et al. 1993, Schmidt et al. 2011, Schmidt and Rattenbury 2013, Putera 2013).

Park Unit or Area (year)	Total Sheep (95% confidence intervals)	Ewe-like Sheep	Lambs	< Full-curl Rams	≥ Full-curl Rams	Lambs:100 Ewe-like Sheep	Rams:100 Ewe-like Sheep
WRST (1990)	25,972 (19,739–32,205)						
WRST (1991)	27,972 (21,524–34,420)						
WRST (1993)	17,455 (13,572–21338)						
WRST (2010-2011)	12,369 (10,680–14,600)	55%	18%	21%	6%	26%	46%
WRST South-Unit 11 (1993)	5,071 (4934–5208)						
WRST South-Unit 11 (2010-2011)	4,434 (3,682–5,470)	57%	18%	19%	6%	27%	38%
WRST North-Unit 12 (2010-2011)	7,980 (6,836–9,505)	55%	17%	22%	6%	26%	50%

Sheep populations in the southwest Wrangell Mountains include count areas CA10–14. Although the population composition in trend count areas CA 11 and CA 12 vary annually, the overall population numbers have remained at low but stable levels during the past 10 years (**Appendix 1**). In 2009, the number of full curl or larger rams or larger dropped to 2 (13%) and the number of lambs:100 ewes dropped

to a low of 20. However, sheep numbers have generally increased in both count areas during 2011 and 2013, particularly for rams in in both count areas and for ewes and lambs in CA12.

Unlike some of the other monitored populations in Unit 11 which peaked in the early 1980s, the Mount Drum population (CA 10) has remained fairly stable with only a moderate decrease in lambs and slight decrease in rams. The sheep population in the Crystalline Hills, an isolated mountain block located adjacent to the McCarthy Road (CA14), has remained at low but stable numbers (approximately 70 animals) since the mid-1990s. There was an significant increase of rams in 2013 compared to earlier surveys when very few rams were observed.

Sheep populations in the southeast Wrangell Mountains, which are count areas CA21, CA 22, and CA 23, have been relatively stable at about 200 sheep in each count area since the mid-1990s. Current survey information suggests that sheep the populations in the south Wrangell Mountains are stable. The lamb:ewe ratios appear to be healthy at 32–33 lambs:100 ewes and the ram:ewe ratios are low to moderate, ranging from 21-40 rams:100 ewes (Schwanke 2011).

While total sheep numbers for CA23 have remained fairly stable over time, differences in Federal and State regulations between the CA23West (Preserve) and CA23 East (Park) have resulted in changes in population dynamics between these two areas. The park area is managed under Federal subsistence regulations, and only residents of NPS resident zone communities and those with 13.440 permits can hunt in this area. Hunting in the preserve (CA 23 West) occurs under both Federal subsistence and State of Alaska general hunting regulations. Fixed wing aircraft may be used to access the preserve for the purpose of harvesting wildlife, but not the park. Off–road vehicles (ORV) may be used for access in both the Park and the Preserve; however, non-Federally qualified subsistence users are restricted to established ORV trails and must obtain a permit. In CA23 West, the ram to ewe ratios for 2001, 2003, and 2007 were consistently low to moderate, averaging 25 rams:100 ewes since 2001 whereas in CA 23 East, the average was 64 rams:100 ewes since 2001 (Schwanke 2011). The percentage of rams classified as full-curl or greater follow a similar pattern with 23% in the Preserve (CA 23 West) and 41% in the Park (CA23 East) for the same time period (Schwanke 2008). Although the variability of the lamb: ewe ratio was more variable in the Preserve (CA23 West) (10-33 lambs:100 ewes) compared to the Park (CA 23 East) (20-27 lambs:100 ewes) since 2001, the average number of lambs;100 ewes was similar between areas with an average of 19 lambs (CA23 West) and 21 (CA23 East).The National Park Service Central Alaska Network (CAKN) used distance sampling methods to survey Dall’s sheep in WRST in 2010 and 2011 (Schmidt et. al. 2011). Two hundred and forty three out of 303 randomly generated 20–km transects were flown. Population estimates generated from these surveys are presented in **Appendix 1**.

Harvest History

Since 1991/1992, sheep harvest in Unit 11 along with the number of hunters has declined steadily. The number of sheep taken by local residents of Units 11,12, and 13 averaged 26 between regulatory year 2005/2006 and regulatory year 2013/2014 (range 20-33) which is approximately 25% more than non-local residents which averaged 17 sheep (range 5-34) over the same time period (**Table2**). A large proportion of rams taken are already greater than $\frac{3}{4}$ curl (Robbins 2015, pers comm., Putera 2015, pers. comm.,

Schwanke 2011). Only 3 sheep have been taken in the Unit 11 Elder and Elder/Minor sheep hunts since 1998.

Table 2. Sheep harvest in Unit 11, 2005/2006 to 2013/2014 (ADF&G 2015, OSM 2015).

Regulatory Year	Rams	Ewes	Total ^a	Local Resident (%) ^b	Nonlocal Resident (%)	Nonresident (%)
2005/2006	78	5	83	32 (34)	34 (41)	17 (21)
2006/2007	62	1	63	33 (52)	18 (29)	12 (19)
2007/2008	48	5	53	26 (49)	18 (34)	9 (17)
2008/2009	54	4	58	28 (48)	25 (43)	5 (9)
2009/2010	62	2	64	27 (42)	23 (36)	14 (22)
2010/2011	48	1	49	23 (51)	15 (31)	10 (20)
2011/2012	48	0	48	28 (58)	10 (21)	10 (21)
2012/2013	33	1	34	20 (59)	7 (21)	7 (21)
2013/2014	45	0	45	23 (51)	5 (11)	17 (38)
2014/2015	46	1	47	23(49)	11(23)	13(28)
Mean	53	2	54	26 (48)	17 (31)	11 (21)

^a Total may exceed sum by residency because some hunters fail to report residency

^b Local means residents of Unit 11, 12 and 13.

Other Alternatives Considered

WRST and ADF&G are starting a study this fall to determine the effects of selective harvest on the ram population structure. The two year study will test the dominance-related mortality (DRM) hypothesis that the survival of young rams is compromised when few dominant rams are present. When most of the mature rams ($\geq 3/4$ curl) are removed by hunting, the juvenile rams participate in the rut to a greater extent. This leads to immature courtship behavior, including harassment of ewes, less tending of ewes, courting anestrus ewes, prolonging the mating season, and remaining with the ewes past the rut. The DRM hypothesis, this increased participation causes greater energy expenditure by both groups, depletes energy reserves, lowers pregnancy and parturition rates, reduces overwinter survival of ewes and could lead to

higher overwinter mortality among all cohorts of the population. WRST would like to replace the proponent's recommendation of a ram with a $\frac{3}{4}$ curl or larger with any ram until their cooperative study with ADF&G concludes in 2 years (Putera 2015, pers. comm.). Although this alternative (any ram) would be less restrictive than the proponent's request (ram with $\geq \frac{3}{4}$ curl) this alternative was not chosen at this time because the potential of disturbance to the ewes and younger rams would likely be greater if younger rams were taken which was contrary to the proponent's request. Although a large percentage of hunters typically select for the larger rams subsistence users may target smaller rams (Table 2, Schwanke 2011). The SCRAC will have time to discuss the merits of this alternative (any male) which would still be more restrictive than any sheep but less restrictive than the proposed change (ram with $\geq \frac{3}{4}$ curl) at their fall meeting.

Effects of the Proposal

If this proposal is adopted, the harvest limit for sheep will change from one sheep to 1 ram with $\frac{3}{4}$ curl or larger and be more restrictive for Federally qualified subsistence users. Federally qualified subsistence users would still have a meaningful priority (1 adult ram with $\frac{3}{4}$ curl or larger) over those hunting under State regulations (1 adult ram with full-curl or larger). This regulation change would help to reduce harvest pressure on ewes and younger rams in sheep populations within Unit 11 and may help aid in the recovery of the population by reducing the disturbance from hunting pressure to the ewes and younger rams.

OSM PRELIMINARY CONCLUSION

Support Proposal WP16-20

Justification

Since the early 1990s the sheep populations in Unit 11 have declined approximately 50%. Reducing the harvest limit from any sheep to 1 ram with a $\frac{3}{4}$ curl will help reduce hunting pressure on ewes and young rams while still retaining a meaningful harvest priority for Federally qualified subsistence users.

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WRITTEN PUBLIC COMMENTS

Ahtna Tene Nene' Customary & Traditional Use Committee Comments

WP16-20 Unit 11 Sheep Hunting Season

Comments:

We oppose WP16-20 Unit 11 Sheep proposal to change the harvest limit from 1 sheep to Rams with 3/4 curl horn or larger. According to an Overview given at Alaska Board of Game meeting in February 2015, sheep populations in Unit 11 are stable. A regulatory change of ram horn size at this time isn't necessary, changing Unit 11 sheep regulations will restrict Federally Qualified Subsistence Users to hunt only for larger rams. If the proponent has a concern about the population of sheep in Unit 11, a proposal to the Alaska Board of Game could address this issue. On average sport hunters harvest as many or more sheep than Federally Qualified Subsistence Users. Additionally, Federally Qualified Subsistence Users cannot fly into hunt on National Park Lands. Sports hunters are allowed to fly in to hunt on preserve lands. Sport hunters are the main concern, in most years, they harvest more sheep in Unit 11 than Federally Qualified Subsistence Users.

Appendix 1

Appendix 1. Unit 11 sheep composition counts from aerial surveys in count areas with Wrangell-St Elias National Park and Preserve (Schwanke 2008, 2011, Putera et al. 2014). See Figure 1 for location of count areas.

CA 2 – Mount Sanford						
Regulatory Year	Full-curl^a (%)^b	< Full-curl	Ewes and yearling rams^c	Lambs (%)^d	Rams:100 Ewes	Total Sheep Observed
2002	13 (20)	49	105	38	59	207
2014	10 (17)	48	102	19	57	179

CA 3W – Upper Copper River						
Regulatory Year	Full-curl^a (%)^b	< Full-curl	Ewes and yearling rams^c	Lambs (%)^d	Rams:100 Ewes	Total Sheep Observed
2001	75 (46)	89	314	24 (5)	52	502
2007	56 (50)	55	344	110 (19)	32	565
2012	9 (8)	106	400	69 (12)	29	584
2013	11(11)	85	207	27 (8)	46	330

CA 10 – Mount Drum						
Regulatory Year	Full-curl^a (%)^b	< Full-curl	Ewes and yearling rams^c	Lambs (%)^d	Rams:100 Ewes	Total Sheep Observed
1980	4 (11)	31	107	59 (29)	33	201
1992	Unk	Unk	273	83 (17)		481
2001	11 (35)	20	65	13 (12)	48	109

CA 11 – Dadina River to Long Glacier						
Regulatory Year	Full-curl ^a (%) ^b	< Full-curl	Ewes and yearling rams ^c	Lambs (%) ^d	Rams:100 Ewes	Total Sheep Observed
1982	24 (33)	48	359	126 (23)	20	24 (33)
1994	18 (46)	21	197	85 (26)	20	18 (46)
2001	16 (37)	27	147	32 (10)	22	16 (37)
2005	10 (34)	19	127	36 (19)	23	10 (34)
2006	10 (45)	12	110	32 (20)	20	10 (45)
2007	11 (52)	10	118	37 (21)	18	11 (52)
2008	8 (33)	16	132	47 (23)	18	8 (33)
2009	2 (13)	13	114	20 (13)	13	2 (13)
2011	7 (17)	34	131	35 (17)	31	7 (17)
2013	5 (15)	28	75	16 (13)	44	5 (15)

CA 12 – Long Glacier to Kuskulana River						
Regulatory Year	Full-curl ^a (%) ^b	< Full-curl	Ewes and yearling rams ^c	Lambs (%) ^d	Rams:100 Ewes	Total Sheep Observed
1981	26 (33)	52	359	129 (232)	22	566
1993	36 (35)	67	426	39 (7)	24	568
2001	23 (30)	54	185	26 (9)	42	288
2005	19 (50)	19	105	28 (16)	36	171
2006	25 (63)	15	58	15 (13)	69	113
2007	27 (49)	28	112	41 (20)	49	208
2008	29 (53)	26	90	35 (19)	61	180

2009	25 (39)	39	81	20 (12)	79	165
2011	0 (0)	25	64	5 (5)	39	94
2013	19 (22)	69	144	26 (10)	61	258

CA 14 – Crystalline Hills						
Regulatory Year	Full-curl^a (%)^b	< Full-curl	Ewes and yearling rams^c	Lambs (%)^d	Rams:100 Ewes	Total Sheep Observed
1981	2 (1)	5	142	60 (29)	5	209
1993	13 (10)	8	85	18 (14)	25	124
2001	1 (2)	10	43	6 (7)	26	91
2005	0 (0)	2	49	21 (29)	4	72
2013	9 (31)	20	136	45 (21)	21	210

CA 21 – Maccoll Ridge						
Regulatory Year	Full-curl^a (%)^b	< Full-curl	Ewes and yearling rams^c	Lambs (%)^d	Rams:100 Ewes	Total Sheep Observed
1982	25 (51)	24	187	69 (23)	26	305
1994	8 (38)	13	161	22 (11)	13	204
2005	9 (31)	20	136	45 (21)	21	210
2010	4 (10)	35	80	43 (27)	49	162
2014	4 (13)	28	63	22 (19)	51	117

CA 22 – Canyon Creek to Barnard Glacier						
Regulatory Year	Full-curl^a (%)^b	< Full-curl	Ewes and yearling rams^c	Lambs (%)^d	Rams:100 Ewes	Total Sheep Observed
1981	27 (49)	28	143	51 (20)	38	249
1993	20 (39)	31	190	63 (21)	27	304
2001	12 (22)	43	176	20 (8)	31	251
2005	16 (29)	39	139	44 (18)	40	238
2011	20 (28)	51	124	51 (21)	57	246
2013	15 (26)	43	142	34 (14)	41	234

CA 23 West – Barnard Glacier East to Park/Preserve Boundary						
Regulatory Year	Full-curl^a (%)^b	< Full-curl	Ewes and yearling rams^c	Lambs (%)^d	Rams:100 Ewes	Total Sheep Observed
1982	20 (47)	23	194	66 (22)	22	303
2001	4 (24)	13	105	10 (8)	16	132
2003	7 (27)	19	78	12 (10)	33	116
2007	4 (18)	18	86	28 (21)	26	136
2013	3 (12)	22	34	2 (3)	74	61

CA 23 East – Park/Preserve Boundary East to Anderson Glacier						
Regulatory Year	Full-curl^a (%)^b	< Full-curl	Ewes and yearling rams^c	Lambs (%)^d	Rams:100 Ewes	Total Sheep Observed
1982	26 (57)	20	26	7 (9)	177	79
2001	46 (52)	42	129	26 (11)	68	243
2003	25 (33)	50	117	25 (12)	64	217
2007	23 (37)	39	103	22 (12)	60	187
2013	11 (19)	46	112	20 (11)	51	189

CA 25 – Between Chitina and Hanagita Rivers						
Regulatory Year	Full-curl^a (%)^b	< Full-curl	Ewes and yearling rams^c	Lambs (%)^d	Rams:100 Ewes	Total Sheep Observed
1983	-	- ^e	25	8 (20)	32	41
2014	2 (15)	11	23	4 (10)	57	40

CA 27 – Between Copper, Chitina, Tebay, and Bremner Rivers						
Regulatory Year	Full-curl^a (%)^b	< Full-curl	Ewes and yearling rams^c	Lambs (%)^d	Rams:100 Ewes	Total Sheep Observed
1983	-	- ^f	75	13 (11)	35	114
2014	9 (21)	34	72	18 (14)	60	133

^a Prior to 1989, the “Full Curl” column included rams 7/8 curl or larger

^b Does not include an unknown number of legal rams at least 8 years old or with both horn tips broomed. Percent full-curl is calculation as a proportion of total rams.

^c Includes yearlings of both sexes and rams of ¼ curl or less

^d Percent lambs is calculated as a proportion of total sheep observed

Regional Wildlife Proposals

^e 8 Total rams seen during the survey

^f 26 Total rams seen during the survey

WP16-60 Executive Summary	
General Description	<p>Proposal WP16-60 requests the Chisana Caribou Herd (CCH) hunt be opened to all Federally qualified subsistence users with a customary and traditional use determination (C&T) for caribou in Unit 12 and that there be an unlimited number of Federal registration permits available.</p> <p><i>Submitted by: Upper Tanana-Fortymile Fish and Game Advisory Committee.</i></p>
Proposed Regulation	<p>Unit 12—Caribou</p> <p><i>Unit 12 — that portion east of the Nabesna River Aug. 10 – Sept. 30 and the Nabesna Glacier and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border – 1 bull by Federal registration permit only.</i></p> <p><i>Federal public lands are closed to the harvest of caribou except by Federally qualified subsistence users hunting under these regulations. residents of Chisana, Chistochina, Mentasta, Northway, Tetlin, Tok, Unit 12 along the Nabesna Road (mileposts 25-46), and that portion of Unit 12 east of the Nabesna River and the Nabesna Glacier and south of the winter trail.</i></p>
OSM Preliminary Conclusion	<p>Support with modification to retain the delegated authority of the superintendent of Wrangell-St. Elias National Park and Preserve to set the number of permits.</p>
Southcentral Regional Advisory Council Recommendation	
Eastern Interior Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	

WP16-60 Executive Summary	
ADF&G Comments	
Written Public Comments	1 Support

**DRAFT STAFF ANALYSIS
WP16-60**

ISSUES

Proposal WP16-60, submitted by the Upper Tanana–Fortymile Fish and Game Advisory Committee, requests the Chisana Caribou Herd (CCH) hunt be opened to all Federally qualified subsistence users with a customary and traditional use determination (C&T) for caribou in Unit 12. The proponent also requests that there be an unlimited number of Federal registration permits available.

DISCUSSION

The proponent states that the intent of the proposal is to open the Chisana Caribou Herd hunt to all Federally qualified subsistence users with a C&T for caribou in Unit 12. Specifically, the proponent is requesting all Federally qualified subsistence users with a C&T for the CCH be allowed to participate in the hunt established in 2012. The proponent claims that the regulations resulting from the Section 804 analysis in 2014 are unnecessarily restrictive.

Based upon the low number of permits issued and caribou harvested over the past three hunting seasons, the proponent feels that the CCH would not be impacted by increasing the number of permits available or the the number of communities approved for the CCH hunt.

The original proposal removed the Federal land closure completely, which would have opened Federal land to all users (including State residents and non-residents). Upon clarification, the proposed Federal regulation reflects the actual intent of this proposal, which is to open Federal lands to all Federally qualified subsistence users only.

Existing Federal Regulation

Unit 12—Caribou

Unit 12 — that portion east of the Nabesna River and the Nabesna Glacier and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border – 1 bull by Federal registration permit only. Aug. 10 – Sept. 30

Federal public lands are closed to the harvest of caribou except by residents of Chisana, Chistochina, Mentasta, Northway, Tetlin, Tok, Unit 12 along the Nabesna Road (mileposts 25-46), and that portion of Unit 12 east of the Nabesna River and the Nabesna Glacier and south of the winter trail.

Proposed Federal Regulation

Unit 12—Caribou

Unit 12 — that portion east of the Nabesna River and the Nabesna Glacier and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border – 1 bull by Federal registration permit only. *Aug. 10 – Sept. 30*

*Federal public lands are closed to the harvest of caribou except by **Federally qualified subsistence users hunting under these regulations.** residents of Chisana, Chistochina, Mentasta, Northway, Tetlin, Tok, Unit 12 along the Nabesna Road (mileposts 25-46), and that portion of Unit 12 east of the Nabesna River and the Nabesna Glacier and south of the winter trail.*

Existing State Regulation

Unit 12—Caribou

Unit 12 remainder

Residents and Nonresidents: No open season.

Extent of Federal Public Lands

Federal public lands comprise approximately 61% of Unit 12 and consists of 48% National Park Service (NPS) managed lands, 11% U.S. Fish and Wildlife Service managed lands (USFWS), and 2% Bureau of Land Management (BLM) managed lands.

Customary and Traditional Use Determinations

Residents of Unit 12, Chistochina, Dot Lake, Healy Lake, and Mentasta Lake have a positive customary and traditional use determination for caribou in Unit 12.

ANILCA Section 804 Determination

Unit 12, that portion east of the Nabesna River and the Nabesna Glacier and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border: Federal public lands are closed to the harvest of caribou except by residents of Chisana, Chistochina, Mentasta, Northway, Tetlin, Tok, Unit 12 along the Nabesna Road (mileposts 25-46), and that portion of Unit 12 east of the Nabesna River and the Nabesna Glacier and south of the Winter Trail.

Regulatory History

Federal regulations were adopted from State regulations for the CCH in Unit 12 in 1990. The season ran from Sept. 1-Sept. 20 with a harvest limit of one bull. A to be announced winter season was also established for residents of Tetlin and Northway only with a harvest limit of one caribou by Federal registration permit.

In 1992, the Federal Subsistence Board (Board) adopted Proposal P92-107, limiting the take of caribou during the winter season to bulls only. This was done due to conservation concerns caused by the mixing of caribou herds (OSM 1992).

In 1993, the Alaska Board of Game (BOG) adopted Proposal 149, establishing a registration permit hunt for the CCH. This was done in an effort to avert the closure of the hunt on Federal lands by the Federal Subsistence Board or the NPS (ADF&G 1993). ADF&G has not issued any permits since RY93.

In 1994, the Board adopted Proposal P94-71, closing that portion of Unit 12 east of the Nabesna River and the Nabesna Glacier and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border to caribou hunting. This was done due to conservation concerns over the declining Chisana Caribou herd (OSM 1994).

In 2010, the Alaska Board of Game approved a joint State-Federal drawing permit hunt for the CCH starting in RY11, for residents and nonresidents from Sept. 1-30 with a bag limit of one bull by drawing permit (ADF&G 2010). However, the entirety of the State authorized CCH hunt area is within Wrangell-St. Elias National Park and Preserve. As Federal public lands in this area are closed to non-Federally qualified subsistence users, there has been no CCH hunt under State regulations.

Also in 2010, the Federal Subsistence Board (Board) considered Proposal WP10-104, which requested establishment of a joint Federal/State draw permit for the CCH in Unit 12 with a harvest limit of one bull and a season of Sept. 1 – Sept. 30. The Board deferred action on WP10-104 to allow time for additional information (i.e. completion of a management plan and population surveys) to be gathered (FSB 2010).

In 2012, deferred Proposal WP10-104 along with new Proposals WP12-65 and WP12-66 were addressed by the Board. WP12-65 requested establishment of a Federal registration hunt for the CCH with a harvest limit of one bull and a season of Aug. 10 – Sept. 30, while WP12-66 requested establishment of a Federal registration hunt with a harvest limit of one bull and a season of Sept. 1 – Sept. 30, with the hunt restricted to Federal public lands in Unit 12 east of the Nabesna River and the Nabesna Glacier and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border.

The Board took no action on WP10-104 and WP12-65 and adopted WP12-66 with modification to identify the communities eligible to participate in the hunt consistent with Section 804 of the Alaska National Interest Lands Conservation Act (ANILCA): Northway, Mentasta, Tetlin, Tok, Chisana, and Chistochina. The authority to manage the Federal hunt was granted to the Wrangell-St. Elias National Park and Preserve Superintendent by letter of delegation from the Board.

Also in 2012, the Board adopted Proposal WP12-68, submitted by the Cheesh'na Tribal Council, adding the residents of Chistochina to the Unit 12 caribou customary and traditional use determination.

In 2014, Proposal WP14-15, submitted by the Wrangell-St. Elias National Park Subsistence Resource Commission, and Proposal WP14-45, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council, requested that the Board include residents of Nabesna (Nabesna Road from mileposts 25 to 46) and residents of the hunt area (Unit 12 east of the Nabesna River and the Nabesna Glacier and south of the Winter Trail) within the group of eligible users for the CCH. The Board took no action on Proposal WP14-45 and adopted WP14-15.

Proposal WP14-49, submitted by Gilliam Joe, requested a modification of the fall season dates for the Unit 12 caribou hunt that takes place east of the Nabesna River and Nabesna Glacier and south of the winter trail, and also requested the establishment of a winter hunt and a meat on the bone requirement. The proposal requested that the fall season be changed from Sept. 1 – Sept. 30 to Aug. 10 – Sept. 20 and that a Feb. 1 – Mar. 31 winter season be established. The Board adopted Proposal WP14-49 with modification to change the fall season dates to Aug. 10 – Sept. 30, but not establish a winter season or a meat on the bone requirement.

Biological Background

The CCH is a small, non-migratory herd inhabiting east-central Alaska (primarily Wrangell-St. Elias National Park and Preserve) and southwestern Yukon, Canada (**Map 1**). Genetic analysis suggests that this herd has been unique for thousands of years. The CCH are considered mountain caribou, characterized by cows calving alone at high elevations rather than aggregating in common calving grounds (Bentzen 2013, Bentzen 2011, CCHWG 2012).

The Chisana Caribou Herd Working Group (CCH Working Group) developed a 2010-2015 management plan for the Chisana Caribou Herd (Plan). The Plan guides harvest and management of the CCH, identifying specific goals, objectives, strategies, and activities. Population indicators identified in the Plan include:

- A stable or increasing population trend.
- An observed bull:cow ratio of 35 bulls:100 cows or greater.
- A three year calf:cow ratio above 15 calves:100 cows.

If any of these criteria are not met, no harvest is recommended. If all criteria are met, the plan recommends an annual bulls-only harvest not exceeding 2% of the estimated population. The Plan also recommends that the harvest be equally distributed between the Yukon (1%) and Alaska (1%). Harvest allocation within Alaska would be determined through the respective Federal and State regulatory process (CCHWG 2012). The CCH Working Group includes the Government of Yukon, Alaska Department of Fish and Game, White River First Nation, Kluane First Nation, National Park Service and U.S. Fish and Wildlife Service.

Little is known about CCH population trends prior to the 1960s. In the mid to late 1970s, the CCH was estimated at 1,000 animals. Estimated herd size peaked in 1988 at 1900 caribou before declining 60% to an estimated low of 315 caribou in 2002 (**Figure 1**). Data indicated that calf recruitment was chronically low during the decline and that the age structure was skewed toward older animals (Bentzen 2013, CCHWG 2012).

Concern over the decline led to implementation of an intensive captive rearing program in Canada, conducted from 2003 to 2006 by the U.S. Geological Survey (USGS) and the Canadian Wildlife Service. The program captured pregnant cows, placing them in holding pens to guard against predators during calving and the neonatal period. The recovery effort is considered successful in enhancing calf survival and recruitment, which may have offset further population declines (CCHWG 2012).

In 2003, survey efforts intensified due to the captive rearing program and the greater number of radio-collared caribou. Therefore, data (i.e. herd size and composition estimates) are not comparable pre and post 2003 (CCHWG 2012). Since 2003, (2003-2014) the CCH population has appeared stable at approximately 700 caribou (**Figure 1**).

Between 1987 and 2002, the bull:cow ratio ranged from 16-40 bulls:100 cows, meeting management objectives in only 4 years. Since 2003, bull:cow ratios have exceeded management objectives, ranging from 37-50 bulls:100 cows between 2003-2014 (**Figure 2**, CCHWG 2012, Putera 2015).

Calf:cow ratios ranged from 0-31 calves:100 cows between 1987 and 2002. Calf:cow ratios ranged from 13-25 calves:100 cows between 2003 and 2014 (**Figure 3**). Between 1990 and 2003, the three year average calf:cow ratio did not meet management objectives. Since 2005, the three year average calf:cow ratio has exceeded management objectives.

Predation, particularly by wolves is considered a limiting factor for the CCH, although more research is recommended to better understand the impacts of predation on this herd (CCHWG 2012). Research conducted by the ADF&G, NPS, and the Yukon Department of the Environment (YDE) indicated predation accounted for 89% of documented mortality of radio-collared cows between 1991 and 2003 (Gross 2007). Disease is not considered a factor limiting the CCH population (CCHWG 2012).

Severe weather may also be a limiting factor. Heavy snow years increase energy expenditure by inhibiting movements and access to forage. Heavy snow could also decrease calving success by hampering cow movements to high elevations and increasing predation risks. Warmer, drier summers may increase harassment by insects (CCHWG 2012).

Habitat

The CCH range is considered very poor caribou habitat due in part to low lichen prevalence. Moss comprises a high proportion of the CCH's winter diet, which has extremely low nutritional value and digestibility compared to lichen. Volcanic ash in the soil may contribute to accelerated tooth wear, indirectly impacting health and longevity (CCHWG 2012).

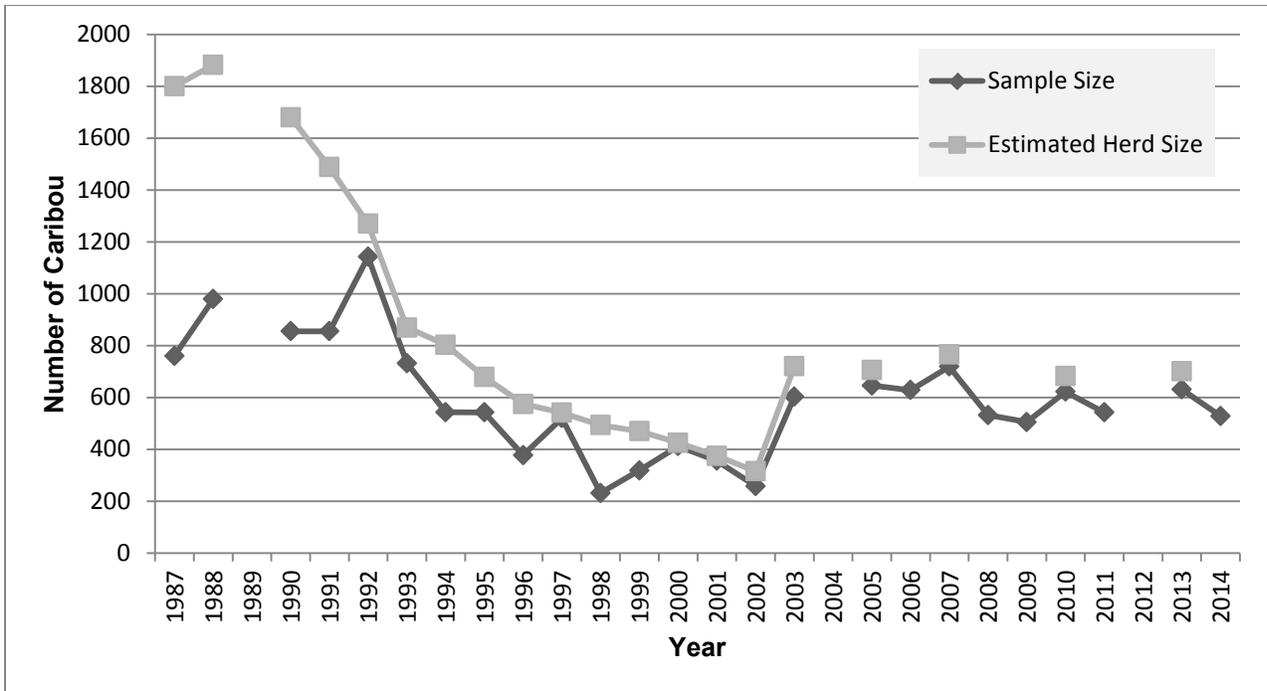


Figure 1. Chisana Caribou Herd population estimates. Estimates before 2003 are derived from ADF&G visual surveys. Estimates in 2003 and after are derived from USGS surveys using a sightability correction factor. No data available for years 1989, 2004, and 2012. In some years, no estimates were determined as no sightability correction factors were determined (CCHWG 2012, Putera 2015).

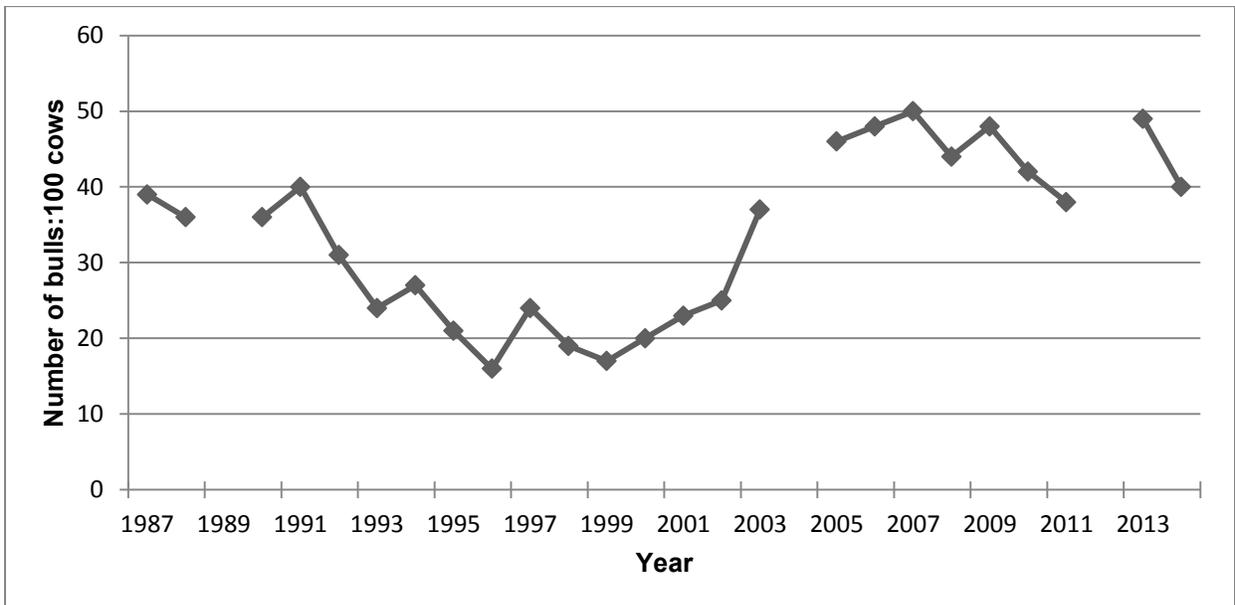


Figure 2. Bull:cow ratios of the Chisana Caribou Herd. Counts before 2003 were conducted by the ADF&G. Counts 2003 and after were conducted by the USGS. No data available for years 1989, 2004, and 2012 (CCHWG 2012, Putera 2015).

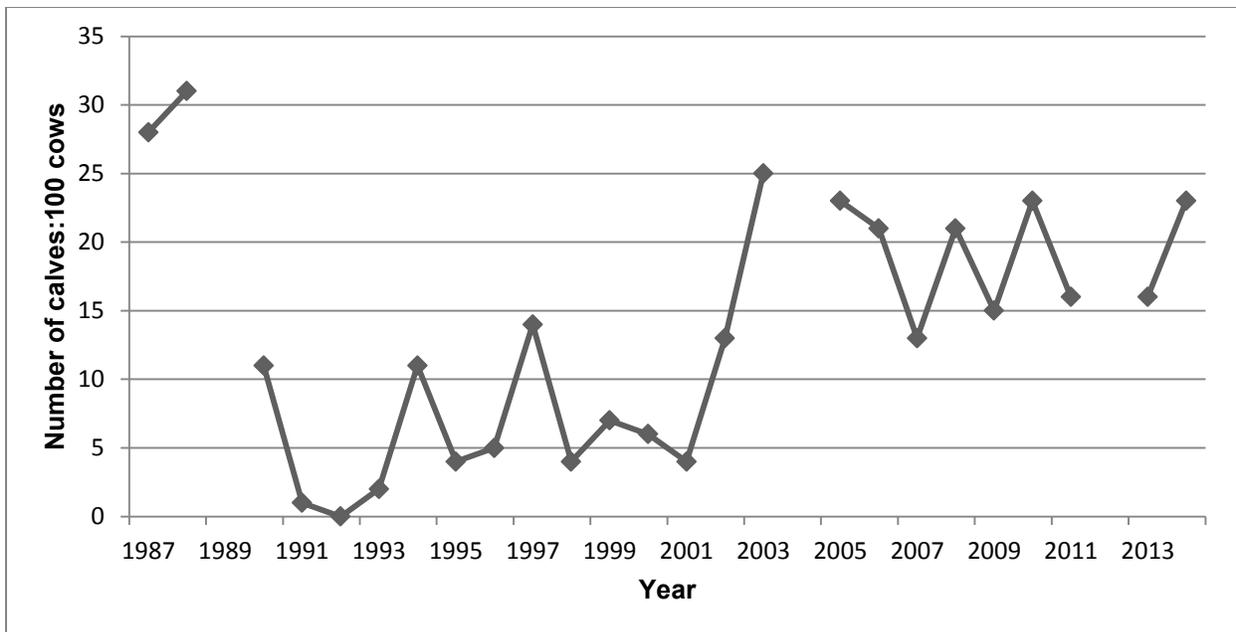


Figure 3. Calf:cow ratios of the Chisana Caribou Herd. Counts before 2003 were conducted by the ADF&G. Counts 2003 and after were conducted by the USGS. No data available for years 1989, 2004, and 2012 (CCHWG 2012, Putera 2015).

Harvest History

Because of its small population size and inaccessibility, the CCH has never supported large harvests across its range. During the early 1900s, residents of Athabascan villages and gold seekers harvested Chisana caribou. Subsistence use of the herd declined after the gold rush ended in 1929 and since Cooper Creek village burned in the mid-1950s, few people have depended on the CCH as their primary food source. However, the CCH continues to be an important aspect of Upper Tanana and Ahtna Athabascan culture (Gross 2007, Bentzen 2011, 2013).

Between the 1950s and 1994 when the CCH hunt closed, guided hunting was the primary use of the herd in Alaska (Gross 2007, Bentzen 2013). Local guides indicate that Chisana caribou are particularly large with large antlers, making them especially valued for guided hunts (OSM 2012).

Total (Yukon and Alaska) estimated caribou harvested from the CCH between regulatory years (RY) 1989 and 1993 ranged from 21-72 caribou/year (**Figure 4**). The unreported caribou harvest in the Yukon was estimated between 1-20 caribou/year during this time period (Gross 2007, Bentzen 2013).

Between RY90-RY94, nonresidents took 58% of the harvested caribou while (State) subsistence users took 9% of the harvest (Bentzen 2013, CCHWG 2012). Because of the remoteness of the CCH, the closure in 1994 essentially affected only the 10 permanent residents in Chisana, half of which were registered guides (FSB 1994). Little illegal harvest has occurred (< 3 caribou/year) since the 1994 closure (**Figure 4**, Gross 2007, Bentzen 2013).

First Nations in the Yukon continued harvesting from the CCH throughout the 1990s. Between 1996 and 1999, First Nation members harvested 3-20 Chisana caribou annually. After 2001, First Nation members voluntarily ceased harvest (**Figure 4**, Gross 2007, Bentzen 2013).

In 2012, a CCH hunt was opened for residents of Northway, Mentasta, Tetlin, Tok, Chisana, and Chistochina by registration permits issued by Wrangell-St. Elias National Park and Preserve (NPP). Permits were allocated to each community according to a permit allocation plan developed by Wrangell-St. Elias NPP and various stakeholders. Under this plan, two permits each are allocated to the four eligible communities with Federally recognized tribal governments (Chistochina, Mentasta Lake, Northway, and Tetlin) with the understanding that all community residents, not just tribal members, would be considered for permit distribution, and the remaining permits are issued to Tok and Chisana residents on a first-come, first-served basis (Cellarius 2013).

In 2014, residents of Unit 12 along the Nabesna Road (mileposts 25-46) and residents of that portion of Unit 12 east of the Nabesna River and the Nabesna Glacier and south of the winter trail were added to the Federal subsistence users eligible to harvest Chisana caribou. Residents of these areas must contact the subsistence coordinator at Wrangell-St. Elias NPP for permit information (Keogh 2014).

The harvest quota for the Federal hunt has been set at 7 bulls per the CCH management plan guidelines (1% of the estimated population). Fourteen permits were available for RY12 and RY13. Eighteen permits were available for RY14.

In all years, the hunt was undersubscribed with Wrangell-St. Elias NPP issuing 9-11 permits/year (**Table 1**). Harvest was also below quota for all years, ranging from 2-3 caribou/year (**Figure 4**, **Table 1**).

Table 1. Chisana Caribou Hunt (FC1205) Summary 2012-2014 (OSM 2015).

	2012	2013	2014
Permits Available	14	14	18
Permits Issued	9	9	11
Individuals Hunting	8	7	8
Animals Harvested	2	3	2

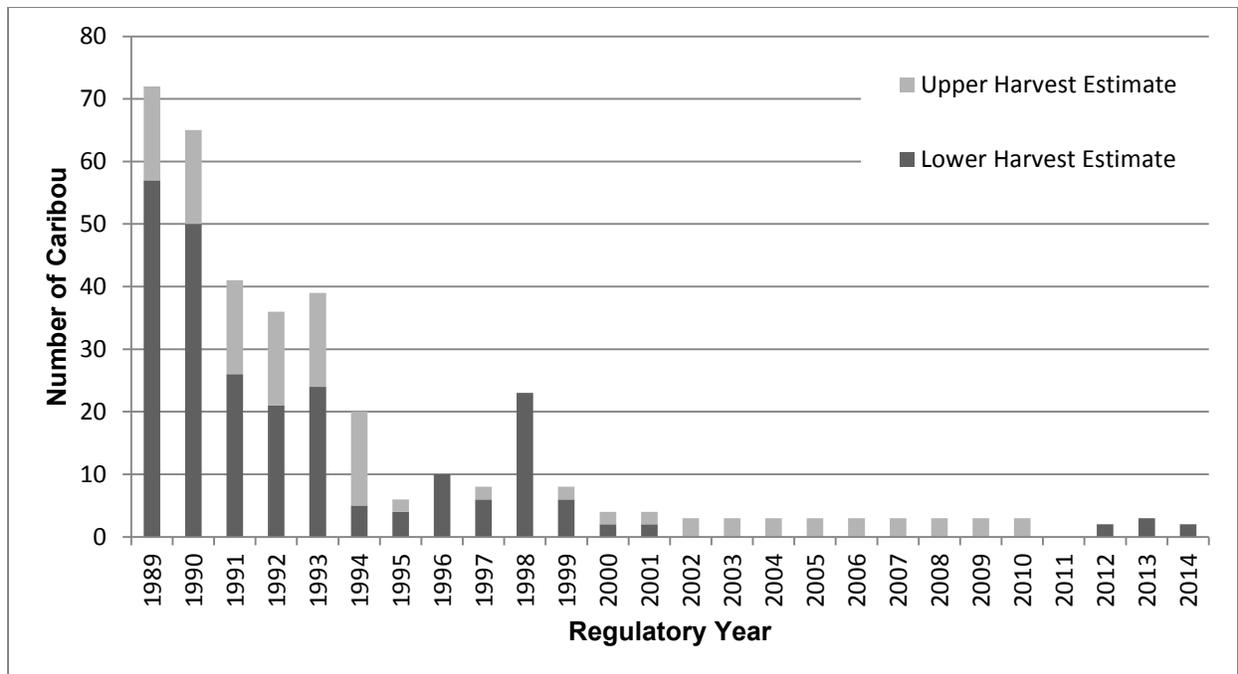


Figure 4. Total estimated caribou harvested from the Chisana Caribou Herd in Alaska and Yukon (Gross 2007, Bentzen 2013, OSM 2015). 1994—The CCH hunt closed in Alaska. 2001—First Nations voluntarily ceased harvest from the CCH in Yukon. 2012—A CCH hunt was opened for Federally qualified subsistence users.

Effects of the Proposal

If adopted, this proposal would open the Chisana Caribou hunt to all Federally qualified subsistence users with a customary and traditional use determination for caribou in Unit 12, increasing hunting opportunities. While overall caribou harvest may increase as a result of adopting this proposal, it is unlikely that the harvest quota (7 bulls) would be met.

Given the low number of permits issued and animals harvested since the Federal hunt began in 2012 as well as a bull:cow ratio that has exceeded management objectives for over 10 years, it is unlikely that adoption of this proposal will have any biological impact on the CCH.

Adopting this proposal would allow an unlimited number of permits to be issued for the CCH hunt, removing the delegated authority of the Wrangell St-Elias National Park and Preserve (NPP) superintendent to set the number of available permits. The Wrangell-St. Elias NPP superintendent would maintain the management authority and flexibility to open/close the season, and announce the harvest quota and reporting period.

OSM PRELIMINARY CONCLUSION

Support Proposal WP16-60 **with modification** to retain the delegated authority of the superintendent of Wrangell-St. Elias National Park and Preserve to set the number of permits.

Justification

Opening the CCH hunt to all Federally qualified users with a C&T determination for this region will provide several communities with additional hunting opportunities. The number of permits issued and animals harvested have been well below quotas from 2012-2014. No biological impacts to the CCH are expected due to a harvest quota and harvest reporting requirements designed to prevent overharvest.

Currently, Wrangell-St. Elias National Park and Preserve superintendent maintains delegated authority to set, open, and close the Federal season and to announce the harvest quota, the number of permits, and the reporting period. This delegated authority enables the in season Federal land manager to quickly respond to any conservation concerns that may arise, ensuring the conservation of the CCH.

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WRITTEN PUBLIC COMMENTS



May 27, 2015

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

RE: 2016-2018 Wildlife Proposals

Dear Mr. Matuskowitz:

Enclosed is Ahtna Tene Nene' Customary & Traditional Use Committee's comments on the 2016-2018 wildlife proposals.

Sincerely,

*Dloria Stickwan
for Roy S. Ewan*

Roy S. Ewan,
Chair

WP16-60 Unit 12 C&T for Chisana Caribou

Comments:

We support WP16-60 with an amendment to allow only federally qualified subsistence users with a positive customary and traditional use for caribou in Unit 12. We oppose opening Unit 12 Chisana Caribou hunt to non-federally qualified subsistence hunters. Adding the communities of Dot Lake, Healy Lake and Tanacross will provide an opportunity for them to harvest Chisana caribou to sustain their livelihood and meet subsistence needs.

As the proposal states, harvesting a Chisana caribou is difficult due to the terrain and access to the hunting area. Most likely not too many more Chisana Caribou will be harvested by including C&T for these additional communities to the Unit 12 caribou hunt.

Additionally, Wrangell St. Elias National Park Superintendent has the discretion to close the hunt, if the hunters are reaching the harvest quota for this caribou herd.

WP16-67 Executive Summary	
General Description	<p>Proposal WP16-67 requests the beaver harvest limit be changed from 15 and 25 beaver/season in Units 12 and 20E, respectively, to no harvest limit in both units; trapping season dates be changed from Sept. 20-May 15 to Sept. 5-June 10; and bow and arrow be added as a legal means of take for beaver in Units 12 and 20E. <i>Submitted by: Upper Tanana-Fortymile Fish and Game Advisory Committee.</i></p>
Proposed Regulation	<p><i>___.26(d) The following methods and means of trapping furbearers for subsistence uses pursuant to the requirements of a trapping license are prohibited, in addition to the prohibitions listed at paragraph (b) of this section:</i></p> <p style="text-align: center;">* * * *</p> <p><i>(3) Taking beaver by any means other than a steel trap or snare, except that you may use firearms and bow and arrow in certain Units with established seasons as identified in Unit-specific regulations found in this subpart;</i></p> <p style="text-align: center;">Unit 12—Beaver Trapping</p> <p><i>15 beaver per season. Only firearms may be used during Sept. 20-Oct. 31 and Apr. 16-May 15, to take up to 6 beaver. Only traps or snares may be used Nov. 1-Apr. 15. The total annual harvest limit for beaver is 15, of which no more than 6 may be taken by firearm under trapping or hunting regulations. No limit. Hide or meat from beaver harvested by firearm must be salvaged for human consumption. Traps, snares, bow and arrow, or firearms may be used. Sept. 2015-May 15 June 10.</i></p> <p style="text-align: center;">Unit 20E—Beaver Trapping</p> <p><i>25 beaver per season. Only firearms may be used during Sept. 20-Oct. 31 and Apr. 16-May 15, to take up to 6 beaver. Only traps or snares may be used Nov. 1-Apr. 15. The total annual harvest limit for beaver is 25, of which no more than 6 may Sept. 2015-May 15 June 10.</i></p>

WP16-67 Executive Summary	
	<i>be taken by firearm under trapping or hunting regulations. —No limit. Hide or meat from beaver harvested by firearm must be salvaged for human consumption. Traps, snares, bow and arrow, or firearms may be used.</i>
OSM Preliminary Conclusion	Support
Southcentral Regional Advisory Council Recommendation	
Eastern Interior Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	1 Support

**DRAFT STAFF ANALYSIS
WP16-67**

ISSUES

Proposal WP16-67, submitted by the Upper Tanana-Fortymile Fish and Game Advisory Committee, requests the beaver harvest limit be changed from 15 and 25 beaver/season in Units 12 and 20E, respectively, to no harvest limit in both units; trapping season dates be changed from Sept. 20-May 15 to Sept. 5-June 10; and bow and arrow be added as a legal means of take for beaver in Units 12 and 20E.

DISCUSSION

The proponent states that the proposed changes would align Federal beaver trapping regulations with the more liberal State regulations as well as provide increased harvest opportunity for Federally qualified subsistence users. The proponent also claims that the proposed changes would have no impact on beaver populations or other users.

Upon personal communication with the proponent, it was clarified that the intention of the proposal was to align Federal and State regulations. Under current State regulations, bow and arrow is a legal means of take for beaver trapping in Units 12 and 20E. Omission of bow and arrow as legal gear in the submitted Federal proposal was an oversight of the proponent.

Existing Federal Regulations

___.26(d) The following methods and means of trapping furbearers for subsistence uses pursuant to the requirements of a trapping license are prohibited, in addition to the prohibitions listed at paragraph (b) of this section:

* * * *

(3) Taking beaver by any means other than a steel trap or snare, except that you may use firearms in certain Units with established seasons as identified in Unit-specific regulations found in this subpart;

Unit 12—Beaver Trapping

15 beaver per season. Only firearms may be used during Sept. 20-Oct. 31 and Apr. 16-May 15, to take up to 6 beaver. Only traps or snares may be used Nov. 1-Apr. 15. The total annual harvest limit for beaver is 15, of which no more than 6 may be taken by firearm under trapping or hunting regulations. Meat from beaver harvested by firearm must be salvaged for human consumption. Sept. 20-May 15.

Unit 20E—Beaver Trapping

25 beaver per season. Only firearms may be used during Sept. 20-Oct. 31 and Apr. 16-May 15, to take up to 6 beaver. Only traps or snares may be used Nov. 1-Apr. 15. The total annual harvest limit for beaver is 25, of which no more than 6 may be taken by firearm under trapping or hunting regulations. Meat from beaver harvested by firearm must be salvaged for human consumption. Sept. 20-May 15.

Proposed Federal Regulations

_.26(d) The following methods and means of trapping furbearers for subsistence uses pursuant to the requirements of a trapping license are prohibited, in addition to the prohibitions listed at paragraph (b) of this section:

* * * *

(3) Taking beaver by any means other than a steel trap or snare, except that you may use firearms **and bow and arrow** in certain Units with established seasons as identified in Unit-specific regulations found in this subpart;

Unit 12—Beaver Trapping

~~15 beaver per season. Only firearms may be used during Sept. 20-Oct. 31 and Apr. 16-May 15, to take up to 6 beaver. Only traps or snares may be used Nov. 1-Apr. 15. The total annual harvest limit for beaver is 15, of which no more than 6 may be taken by firearm under trapping or hunting regulations. No limit. Hide or meat from beaver harvested by firearm must be salvaged for human consumption. Traps, snares, bow and arrow, or firearms may be used.~~ Sept. 2015-May 15 June 10.

Unit 20E—Beaver Trapping

~~25 beaver per season. Only firearms may be used during Sept. 20-Oct. 31 and Apr. 16-May 15, to take up to 6 beaver. Only traps or snares may be used Nov. 1-Apr. 15. The total annual harvest limit for beaver is 25, of which no more than 6 may be taken by firearm under trapping or hunting regulations. No limit. Hide or meat from beaver harvested by firearm must be salvaged for human consumption. Traps, snares, bow and arrow, or firearms may be used.~~ Sept. 2015-May 15 June 10.

Existing State Regulations

5AAC 92.095(a) *The following methods and means of taking furbearers under a trapping license are prohibited, in addition to the prohibitions in 5 AAC 92.080:*

* * * *

(2) *by disturbing or destroying any beaver house;*

(3) *taking beaver by any means other than a steel trap or snare, except that a firearm may be used to take two beaver per day in Units 9 and 17 from April 15 through May 31 if the meat is salvaged for human consumption; a firearm may be used to take beaver in Units 8, 18, 22, and 23 throughout the seasons and with the bag limits established in 5 AAC 84; a firearm or bow and arrow may be used to take beaver in Units 12, 19, 20(A), 20(C), 20(E), 20(F), 21, 24, and 25 throughout the seasons and with the bag limits established in 5 AAC 84;*

Units 12, 20A, 20C, 20E, and 20F—Beaver Trapping

Residents and Nonresidents: No limit.

Sept. 15-Jun. 10

Extent of Federal Public Lands

Federal public lands comprise approximately 61% of Unit 12 and consist of 48.2% National Park Service (NPS) managed lands, 10.9% U.S. Fish and Wildlife Service (FWS) managed lands, and 1.8% Bureau of Land Management (BLM) managed lands.

Federal public lands comprise approximately 30% of Unit 20E and consist of 20.4% NPS managed lands and 9.1% BLM managed lands.

Customary and Traditional Use Determinations

The Federal Subsistence Board (Board) has not made a customary and traditional use determination for beaver in Units 12 and 20E. Therefore, all Federally qualified users may harvest this species in these units.

Regulatory History

Federal regulations for beaver trapping in Units 12 and 20E were adopted from State regulations in 1990. The season for both units ran from Nov. 1-Apr. 15. The harvest limits for Units 12 and 20E were 15 and 25 beaver per season, respectively.

In 2002, the Alaska Board of Game (BOG) expanded the beaver trapping season in Units 12 and 20E from Nov. 1-Apr. 15 to Sept. 20-May 15. The new State regulations also specified that only firearms could be used during the expanded season (Sept. 20-Oct. 31 and Apr. 16-May 15) to take up to six beavers and that the meat must be salvaged for human consumption.

In 2002, the Alaska BOG also adopted Proposal 120, eliminating sealing requirements for beaver in both units in 2002 due to an absence of any population concerns, low trapping pressure, and low fur prices (Crawford 2002).

In 2003, the Federal Subsistence Board (Board) adopted Proposal WP03-49 with modification, which aligned Federal regulations with the State regulations stated above. As take by firearm was not permitted under a trapping license on National Park Service (NPS) lands, WP03-49 was modified to open a beaver hunting season on NPS lands in Units 12 and 20E. These changes were made to provide increased opportunity for Federally qualified subsistence users.

In 2006, the Alaska BOG expanded the beaver trapping season in Units 12 and 20E from Sept. 20-May 15 to Sept. 15-May 31 and increased the bag limit in Unit 12 from 15 to 25 beavers. The firearm restriction was also lifted under State regulations. Firearms could be used throughout the State trapping season to harvest beaver for either fur or meat.

In 2008, the Alaska BOG adopted Proposal 82, which extended the beaver trapping season in Units 12 and 20E from Sept. 15-May 31 to Sept. 15-June 10 and changed the bag limit from 25 to no limit for both units. This was done due to low harvest numbers and abundant beaver populations (Bentzen 2010). Adoption of Proposal 82 also allowed for the use of bow and arrow as a legal means of take under a trapping license.

Biological Background

State management goals and objectives for furbearers in Units 12 and 20E are as follows (Bentzen 2010):

- Provide the greatest opportunity to participate in hunting and trapping furbearers.
- Maintain viable populations of furbearers that will support annual hunting and trapping harvest.

Beaver populations fluctuate annually in Units 12 and 20E due to a variety of factors, including weather, amount and timing of snow pack runoff, habitat quality and successional stage, and predation (Bentzen 2010, Gross 2004).

Since regulatory year 1996/97, ADF&G trapper questionnaires have provided furbearer abundance and population trends based on responses from area trappers. While qualitative, this information is useful for tracking population changes over time and is the best available for many furbearer populations, including beavers in Units 12 and 20E. From 2003/04 to 2012/13, beaver populations have been reported as stable at low to moderate levels in both units (Bentzen 2010, **Table 1**).

Harvest History

Trapping pressure on beavers in Units 12 and 20E is low. As sealing requirements for beaver in Units 12 and 20E were eliminated in regulatory year 2002, available harvest data for these units in subsequent years is limited. Beaver are not generally targeted by area trappers, but do provide an important subsistence resource to Northway residents who primarily harvest beaver in Unit 12. Residents of Eagle harvest the majority of the beavers in Unit 20E along the Yukon River for food and handicrafts (Bentzen 2010).

Before 2002 when sealing was discontinued, beaver harvest averaged 47 beavers/year (**Figure 1**, Gross 2004). Since 2002, reported beaver harvest has averaged 14 beavers/year (**Figure 1**, ADF&G 2005, 2006, 2007, 2010a, 2010b, 2010c, 2012, 2013a, 2013b). Harvest has been consistently greater in Unit 12 than in Unit 20E (**Figure 1**).

The most recent State furbearer management report recommends no change to the beaver trapping season or bag limit in Units 12 and 20E based on observations by ADF&G personnel, interviews with area trappers, population status and trends (Bentzen 2010).

Table 1. Relative abundance and trend of beaver populations for Units 12 and 20E as reported by trappers (ADF&G 2005, 2006, 2007, 2010a, 2010b, 2010c, 2012, 2013a, 2013b).		
Year	Relative Abundance	Trend
2012	common	same
2011	common	same
2010	scarce	same
2009*	-	-
2008	scarce	same
2007	common	fewer
2006	common	same
2005	common	same
2004	common	same
2003	common	same
*No report written		

Effects of the Proposal

If this proposal is adopted, the beaver season would be extended from Sept. 20-May 15 to Sept. 15-June 10, the harvest limit would be changed from 15 and 25 beaver/season in Units 12 and 20E, respectively, to no harvest limit in both units, and bow and arrow would be added as a method and means of harvest.

No impacts to the beaver population or user groups is expected as Federally qualified subsistence users can already trap on most (non-National Park) Federal lands under the more liberal State regulations. Additionally, adoption of this proposal would align Federal and State regulations, reducing the regulatory complexity for users.

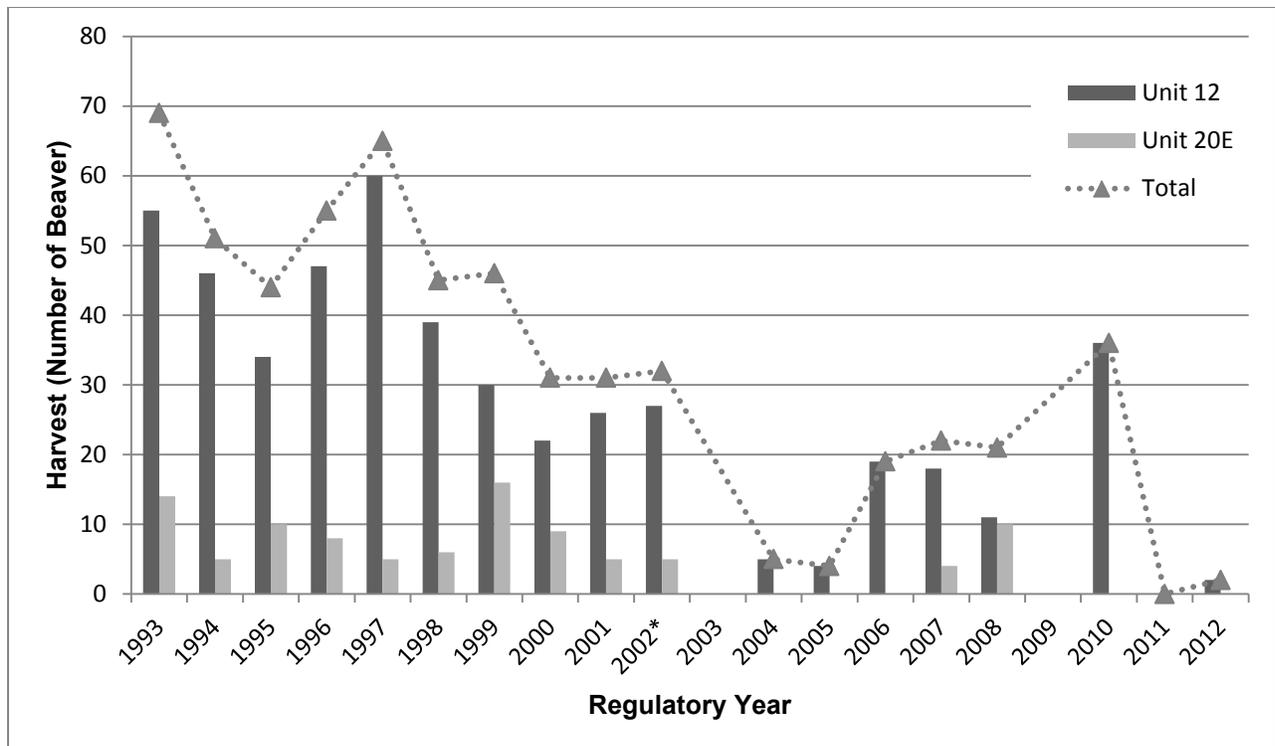


Figure 1. Beaver harvest in Units 12 and 20E (Gross 2004, ADF&G 2005, 2006, 2007, 2010a, 2010b, 2010c, 2012, 2013a, 2013b). Harvest before 2002 is from sealing data. Harvest after 2002 is optionally reported harvest from trapper questionnaires. *Sealing was discontinued in 2002. No data available for 2003 and 2009.

OSM PRELIMINARY CONCLUSION

Support Proposal WP16-67

Justification

Beaver populations appear stable at moderate levels in these units and harvest is low. Federally qualified subsistence users are already able to trap on most Federal public lands under the more liberal State regulations. Adopting this proposal would provide Federally qualified subsistence users with additional harvest opportunities and methods and means for beaver trapping under Federal regulations. Additionally, Federal and State regulations for beaver trapping in Units 12 and 20E would be aligned, reducing regulatory complexity.

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WRITTEN PUBLIC COMMENTS



May 27, 2015

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

RE: 2016-2018 Wildlife Proposals

Dear Mr. Matuskowitz:

Enclosed is Ahtna Tene Nene' Customary & Traditional Use Committee's comments on the 2016-2018 wildlife proposals.

Sincerely,

*Dloria Stickwan
for Roy S. Ewan*

Roy S. Ewan,
Chair

WP16-67 Unit 12 Beaver Hunting/Trapping Season

We support WP16-67 to change Unit 12 Beaver to hunting and trapping season from September 15 to June 10 with no limit, meat or hide must be salvaged, traps, snares or firearms may be used. Aligning state and federal methods and means, hunting seasons, no limit, meat or hide must be salvaged will allow more hunting and trapping opportunities on federal public lands.

Beaver population data is collected through surveys given to trappers. The Department of Fish & Game relies on this survey to determine beaver population. Harvest data gathered through surveys that trappers fill out and return to ADF&G office indicates that there isn't a conservation concern. According ADF&G Overview given at Central/Southwest meeting in February 2015, beaver population is stable/high, and beaver harvest was 225.

Page 4 of 5

**DRAFT STAFF ANALYSIS
WP16-68**

ISSUES

Proposal WP16-68, submitted by the Upper Tanana – Fortymile Fish and Game Advisory Committee, requests that the lynx trapping season in Units 12 and 20E be extended from Nov. 1 – Dec. 31 to Nov. 1 – Mar. 15, and that the Nov. 1 – Nov. 30 harvest limit of 5 lynx be eliminated.

DISCUSSION

The proponent states that the proposed changes will provide additional trapping opportunities for Federally qualified subsistence users, while aligning Federal subsistence trapping regulations with current State trapping regulations.

Existing Federal Regulation

Units 12 and 20E—Lynx

*No limit, however no more than 5 lynx may be taken
between Nov. 1 and Nov. 30*

Nov. 1 – Dec. 31

Proposed Federal Regulation

Units 12 and 20E—Lynx

*No limit, ~~however no more than 5 lynx may be taken~~
~~between Nov. 1 and Nov. 30~~*

*Nov. 1 – ~~Dec. 31~~ Mar.
15*

Existing State Regulation

Units 12, 19, 20, 21, and 25C—Lynx

No limit

Nov. 1 – Mar. 15

Extent of Federal Public Lands

Federal public lands comprise approximately 61% of Unit 12 and consist of 48% National Park Service (NPS) managed lands, 11 % U.S. Fish and Wildlife Service managed lands, and 2% Bureau of Land Management (BLM) managed lands.

Federal public lands comprise approximately 29% of Unit 20E and consist of 20% NPS managed lands and 9% BLM managed lands.

Customary and Traditional Use Determinations

The Federal Subsistence Board (Board) has not made a customary and traditional use determination for lynx in Units 12 and 20E. All Federally qualified subsistence users may harvest lynx in these units.

Regulatory History

In 1987, the Alaska Department of Fish and Game (ADF&G) adopted a tracking harvest strategy for managing lynx (ADF&G 1987). This strategy calls for shortening or closing trapping seasons when lynx numbers are low, and lengthening or opening seasons when lynx are abundant. In the spring of 1992, the Alaska Board of Game adopted maximum possible seasons for a number of management units within the state, and delegated authority to ADF&G to adjust seasons within seasonal windows. The decision to adjust the season was based upon the reported number of lynx harvested and the percentage of kittens within the total harvest.

The Board endorsed the State's strategy for setting lynx seasons and regularly made annual adjustments to the Federal seasons to align with State seasons. In 2001, in response to Proposal WP01-44, the Board adopted a statewide regulatory provision and issued a Delegation of Authority Letter so that the Assistant Regional Director for the Office of Subsistence Management (OSM) could adjust lynx trapping regulations through the use of the ADF&G tracking harvest strategy. This delegated authority required coordination with ADF&G, consultation with appropriate Federal land management agencies, development of a staff analysis to evaluate the effects of the changes to the season and harvest limit, and Interagency Staff Committee concurrence (FWS 2001).

In 2004, the Board adopted Proposal WP04-36, which clarified implementation procedures for Delegation of Authority to the Assistant Regional Director for OSM. The existing Delegation of Authority Letter allowed the Assistant Regional Director to adjust seasons and harvest limits through Special Action provisions. However, the Board's intent had been to allow annual adjustments using current harvest information and in line with the State's tracking harvest strategy. This action designated a Nov. 10 – Feb. 28 maximum season but allowed the Assistant Regional Director to continue making annual adjustments to seasons and harvest limits (FWS 2004).

By 2008 the Alaska Board of Game had discontinued use of the tracking harvest strategy in Units 12 and 20E, and had established permanent seasons in these units. To maintain parallel State and Federal management strategies, the Board adopted with modification Proposal WP10-04 in 2010. This resulted in

removal of Units 12 and 20E, along with a number of other units, from the area for which the Assistant Regional Director for OSM had the delegated authority to open, close or adjust Federal subsistence lynx seasons and to set harvest and possession limits (FWS 2010).

In 2010, the Alaska Board of Game adopted Proposal 17, which resulted in the establishment of the current lynx season and limit for Units 12 and 20E. This action by the Alaska Board of Game addressed concerns that some trappers were targeting lynx in November, when harvest was limited to 5 lynx, but not reporting them until December, when there was no harvest limit. The original rationale for limiting harvest to five lynx during November was to allow trappers to retain lynx trapped incidentally when targeting other species, even though pelt quality is low at this time of year (ADF&G 2010a).

Biological Background

Lynx are common in Alaska (Yom-Tov et al. 2007). Snowshoe hares are the predominant prey of lynx and are believed to comprise up to 83% of the species’ diet (Yom-Tov et al. 2007; O’Donoghue et al. 1997). As a result, lynx populations fluctuate in direct response to changes in hare abundance (Yom-Tov et al. 2007). Snowshoe hares have a cyclical population trend that lasts from 8 – 11 years and lynx population numbers fluctuate in tandem with this trend, with a lag of 1 – 2 years (FWS 2013).

In Alaska, sealing records are used as a proxy for determining lynx population trends. An analysis of statewide lynx harvest sealing records from 1990 through 2013 reveals three population highs, occurring 1991 – 1992, 2000 – 2001, and 2008 – 2009, followed shortly by population lows, occurring 1995 – 1996, 2002 – 2003, and 2012 – 2013 (ADF&G 2002, 2005, 2006, 2007, 2010b, 2010c, 2010d, 2012, 2013a, 2013b; **Figure 1**). The lynx population in Interior Alaska remains in the low phase of the cycle (Berg 2015, pers. comm.; Burch 2015, pers. comm.; Gross 2015, pers. comm.)

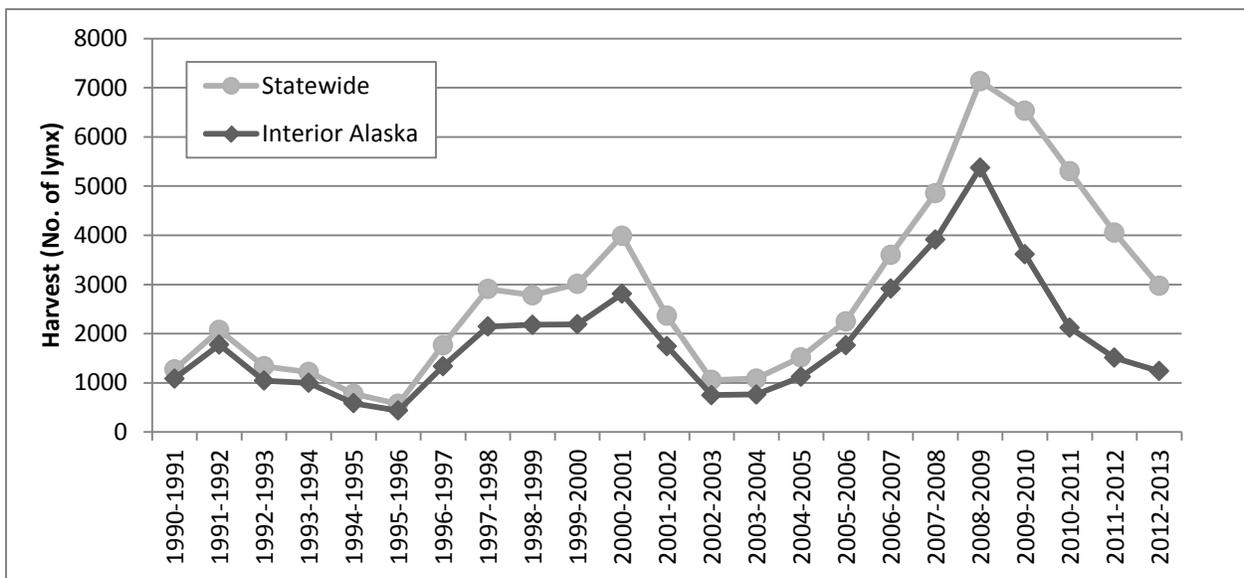


Figure 1. Lynx Population Trends, based on Harvest Sealing Data 1990-2013. Interior Alaska includes Units 12, 19A-D, 20A-F, 21A-E, 24A-C, 25A-D. (ADF&G 2002, 2005, 2006, 2007, 2010b, 2010c, 2010d, 2012, 2013a, 2013b).

Harvest History

The State no longer utilizes a tracking harvest strategy for managing lynx harvest in Interior Alaska. Rather, fixed seasons and harvest limits are implemented in Units 12 and 20E (Gross 2015, pers. comm.). Under this system, harvest limits remain static despite sizable fluctuations in lynx abundance. However, trapper effort parallels lynx abundance (Berg 2015, pers. comm.; Gross 2015, pers. comm.), and few trappers are active during the low phase (Bentzen 2010). See **Table 1** for reported lynx harvest in Units 12 and 20E.

Table 1. Reported Lynx Harvest in Units 12 and 20E, based on ADF&G Trapper Questionnaires, 2004-2013 (ADF&G 2006, 2007, 2010b, 2010c, 2010d, 2012, 2013a, 2013b).

Regulatory Year	Unit 12	Unit 20E
2004-2005	14	2
2005-2006	0	0
2006-2007	171	8
2007-2008	164	177
2008-2009	139	297
2009-2010	<i>No data</i>	<i>No data</i>
2010-2011	99	20
2011-2012	5	16
2012-2013	23	2

Effects of the Proposal

If adopted, this proposal would allow unlimited harvest Nov. 1 – Mar. 15, which would result in increased opportunity for Federally qualified subsistence users. Adoption of this proposal is not expected to have an appreciable effect on the lynx population, since lynx populations are regulated primarily by prey availability and because trapper effort and harvest decline sharply during the low phase of the population cycle. Additionally, adoption of this proposal would reduce regulatory complexity for lynx in Units 12 and 20E by creating parallel Federal and State lynx trapping seasons and by removing the Nov. 1 – Nov. 30 harvest limit.

OSM PRELIMINARY CONCLUSION

Support Proposal WP16-68.

Justification

Adoption of this proposal will provide additional harvest opportunities for Federally qualified subsistence users by lengthening the season and eliminating the harvest limit for the Nov. 1 – Nov. 30 time period. These changes are not expected to affect the lynx population, since lynx populations are regulated primarily by prey availability and because trapper effort declines during times of low lynx abundance. These changes will also reduce regulatory complexity, which will benefit subsistence users and is consistent with past Federal regulatory adjustments that reflect changes in State seasons and harvest limits.

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WRITTEN PUBLIC COMMENTS



May 27, 2015

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

RE: 2016-2018 Wildlife Proposals

Dear Mr. Matuskowitz:

Enclosed is Ahtna Tene Nene' Customary & Traditional Use Committee's comments on the 2016-2018 wildlife proposals.

Sincerely,

*Dloria Stickwan
for Roy S. Ewan*

Roy S. Ewan,
Chair

WP16-68 Unit 12 Lynx Trapping Season

Comments:

We oppose WP 16-68 to lengthen Unit 12 Lynx trapping season from Nov. 1- Nov. 30 to Nov 1- Mar. 15 with no limit. According to ADF&G Overview presented at Central/Southwest meeting in February 2015, lynx population is low, harvest is 444.

Opening a trapping season with no limit when the population is low and changing the dates to allow a longer trapping season is counterproductive to lynx populations.



Federal Subsistence Board

1011 East Tudor Road, MS121
Anchorage, Alaska 99503



FISH and WILDLIFE SERVICE
BUREAU of LAND MANAGEMENT
NATIONAL PARK SERVICE
BUREAU of INDIAN AFFAIRS

FOREST SERVICE

FEB 26 2015

FWS/OSM 14096.PM

Cordova District Ranger
Chugach National Forest
P.O. Box 280
Cordova, Alaska 99574

Dear District Ranger:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the Cordova District Ranger of the U.S. Forest Service to issue emergency or temporary special actions if necessary to ensure the conservation of a healthy wildlife population, to continue subsistence uses of wildlife, for reasons of public safety, or to assure the continued viability of the population. This delegation only applies to the Federal public lands subject to Alaska National Interest Lands Conservation Act (ANILCA) Title VIII jurisdiction within Unit 6, for the management of moose and deer on these lands.

It is the intent of the Board that actions related to management of moose and deer by designated Federal officials be coordinated, prior to implementation, with the Alaska Department of Fish and Game (ADF&G), Bureau of Land Management (BLM) Anchorage Field Office Manager (for BLM-affected lands), National Park Service (NPS) Wrangell – St. Elias National Park and Preserve Superintendent (for NPS-affected lands), and the Chair of the Southcentral Alaska Subsistence Regional Advisory Council (Council) to the extent possible. Federal managers are expected to work with managers from the State and other Federal agencies, the Council Chair, and applicable Council members, local Tribes, and Alaska Native Corporations to minimize disruption to subsistence resource users and existing agency programs, consistent with the need for special action.

DELEGATION OF AUTHORITY

1. **Delegation:** The Cordova District Ranger is hereby delegated authority to issue emergency or temporary special actions affecting moose and deer on Federal public lands as outlined under the **Scope of Delegation** below. Any action greater than 60 days in length (temporary special action) requires a public hearing before implementation. Special actions are governed by Federal regulation at 36 CFR 242.19 and 50 CFR 100.19.

Cordova District Ranger

2

2. Authority: This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6), which state: “The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish or wildlife harvest seasons within the frameworks established by the Board.”

3. Scope of Delegation: The regulatory authority hereby delegated is limited to the following authorities within the limits set by regulation at 36 CFR 242.26 and 50 CFR 100.26

- You may set Federal subsistence harvest quotas, close, reopen or adjust seasons, and adjust harvest and possession limits for moose and deer, to include the sex that may be harvested. You may also close Federal public lands to the take of moose and deer by all users.
- This delegation may be exercised only when it is necessary to conserve moose and deer populations, to continue subsistence uses, for reasons of public safety, or to assure the continued viability of the population.

All other proposed changes to codified regulations, such as customary and traditional use determinations, adjustments to methods and means of take, or closures and restrictions for take for only non-Federally qualified users shall be directed to the Federal Subsistence Board.

The Federal lands subject to this delegated authority are those within Unit 6.

4. Effective Period: This delegation of authority is effective from the date of this letter and continues until superseded or rescinded.

5. Guidelines for Delegation: You will become familiar with the management history of the wildlife species relevant to this delegation in the region, with current State and Federal regulations and management plans, and be up-to-date on population and harvest status information. You will review special action requests or situations that may require a special action and all supporting information to determine: (1) consistency with 36 CFR 242.19, (2) if the request/situation falls within the scope of authority, (3) if significant conservation problems or subsistence harvest concerns are indicated, and (4) what the consequences of taking an action or no action may be on potentially affected Federally qualified subsistence users and non-Federally qualified subsistence users. Requests not within your delegated authority will be forwarded to the Federal Subsistence Board for consideration. You will maintain a record of all special action requests and rationale for your decision. A copy of this record will be provided to the Administrative Records Specialist in the Office of Subsistence Management (OSM) no later than sixty days after development of the document.

You will notify OSM and coordinate with local ADF&G managers, BLM Anchorage Field Office Manager (for BLM-effected lands), Wrangell – St. Elias National Park and Preserve Superintendent

Cordova District Ranger

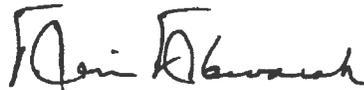
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(for NPS-effected lands), and the Council Chair regarding special actions under consideration. You will issue decisions in a timely manner. Before the effective date of any decision, reasonable efforts will be made to notify the public, OSM, affected State and Federal managers, law enforcement personnel, and Council members. If an action is to supersede a State action not yet in effect, the decision will be communicated to the public, OSM, affected State and Federal Managers, and the local Council members at least 24 hours before the State action would be effective. If a decision to take no action is made, you will notify the proponent of the request immediately. A summary of special action requests and your resultant actions must be provided to the coordinator of the appropriate Subsistence Regional Advisory Council(s) at the end of each calendar year for presentation to the Council(s).

You may defer a special action request, otherwise covered by this delegation of authority, to the Federal Subsistence Board in instances when the proposed management action will have a significant impact on a large number of Federal subsistence users or is particularly controversial. This option should be exercised judiciously and may be initiated only when sufficient time allows for it. Such deferrals should not be considered when immediate management actions are necessary for conservation purposes. The Federal Subsistence Board may determine that a special action request may best be handled by the Board, subsequently rescinding the delegated regulatory authority for the specific action only.

6. Support Services: Administrative support for regulatory actions will be provided by the Office of Subsistence Management, U.S. Fish & Wildlife Service, Department of the Interior.

Sincerely,



Tim Towarak
Chair

cc: Assistant Regional Director, Office of Subsistence Management
Deputy Assistant Regional Director, Office of Subsistence Management
Council Coordinator, Southcentral Alaska Subsistence Regional Advisory Council
Chair, Southcentral Alaska Subsistence Regional Advisory Council
Superintendent, Wrangell-St. Elias National Park and Preserve
Anchorage Field Office Manager, Bureau of Land Management
Commissioner, Alaska Department of Fish and Game
Federal Subsistence Liaison Team Leader, Alaska Department of Fish and Game
Federal Subsistence Board
Interagency Staff Committee
Administrative Record

FISHERIES RESOURCE MONITORING PROGRAM

BACKGROUND

Beginning in 1999, the Federal government assumed expanded management responsibility for subsistence fisheries on Federal public lands in Alaska under the authority of Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Expanded subsistence fisheries management introduced substantial new informational needs for the Federal system. Section 812 of ANILCA directs the Departments of the Interior and Agriculture, cooperating with the State of Alaska and other Federal agencies, to undertake research on fish and wildlife and subsistence uses on Federal public lands. To increase the quantity and quality of information available for management of subsistence fisheries, the Fisheries Resource Monitoring Program (Monitoring Program) was established within the Office of Subsistence Management (OSM). The Monitoring Program was envisioned as a collaborative interagency, interdisciplinary approach to enhance existing fisheries research, and effectively communicate information needed for subsistence fisheries management on Federal public lands.

Biennially, the Office of Subsistence Management announces a funding opportunity for investigation plans addressing subsistence fisheries on Federal public lands. The 2016 Notice of Funding Availability focused on priority information needs developed either by strategic planning efforts or subject matter specialist input, followed by review and comment by the Subsistence Regional Advisory Councils. The Monitoring Program is administered through regions, which were developed to match subsistence management regulations, as well as stock, harvest, and community issues common to a geographic area. The six Monitoring Program regions are shown in **Figure 1**.

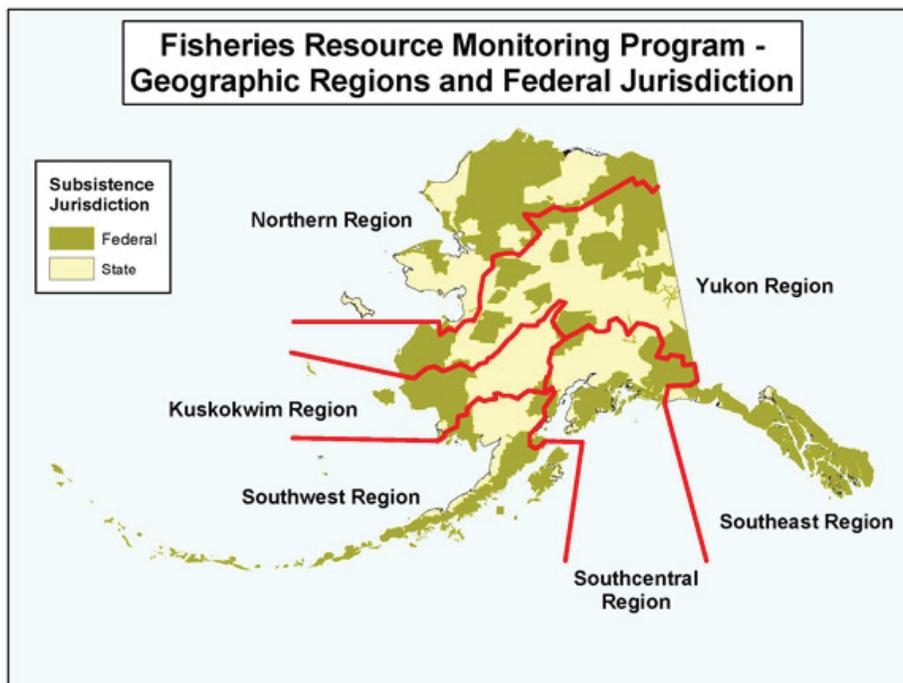


Figure 1. Geographic Regions for the Fisheries Resource Monitoring Program.

To implement the Monitoring Program, a collaborative approach is utilized in which five Federal agencies (U.S. Fish and Wildlife Service, Bureau of Land Management, National Park Service, Bureau of Indian Affairs, and U.S. Forest Service) work with the Alaska Department of Fish and Game, Regional Advisory Councils, Alaska Native Organizations, and other organizations. An interagency Technical Review Committee provides scientific evaluation of investigation plans submitted for funding consideration. The Regional Advisory Councils provide review and recommendations, and public comment is invited. The Interagency Staff Committee also provides recommendations. The Federal Subsistence Board takes into consideration recommendations and comments from the process, and forwards a Monitoring Plan to the Assistant Regional Director of OSM for final approval.

Strategic plans sponsored by the Monitoring Program have been developed by workgroups of fisheries managers, researchers, Federal Subsistence Regional Advisory Councils, and by other stakeholders for three of the six regions: Southeast, Southcentral (excluding Cook Inlet Area), and Southwest Alaska. These plans identify prioritized information needs for each major subsistence fishery and are available for viewing on the Federal Subsistence Management, Fisheries Resource Monitoring Program website (<http://www.doi.gov/subsistence/index.cfm>). Individual copies of plans are available by placing a request to the Office of Subsistence Management. Independent strategic plans were completed for the Yukon and Kuskokwim regions for salmon in 2005. For the Northern Region and the Cook Inlet Area, assessments of priority information needs were developed from experts on the Regional Advisory Councils, the Technical Review Committee, Federal and State managers, and staff from the Office of Subsistence Management. Finally, a strategic plan specifically for research on whitefish species in the Yukon and Kuskokwim River drainages was completed in spring 2011 as a result of efforts supported through Monitoring Program project 08-206 (Yukon and Kuskokwim Coregonid Strategic Plan). Currently, all regional strategic plans need to be updated. The OSM, in collaboration with Regional Advisory Councils and agency partners, will be exploring methods to update these plans, develop a schedule into the future and ensure they are current and represent the most up-to-date information about subsistence needs and concerns throughout the state.

HISTORICAL OVERVIEW

The Monitoring Program was first implemented in 2000, with an initial allocation of \$5 million. Since 2001, a total of \$103.6 million has been allocated for the Monitoring Program to fund a total of 431 projects (**Figure 2; Figure 3**).

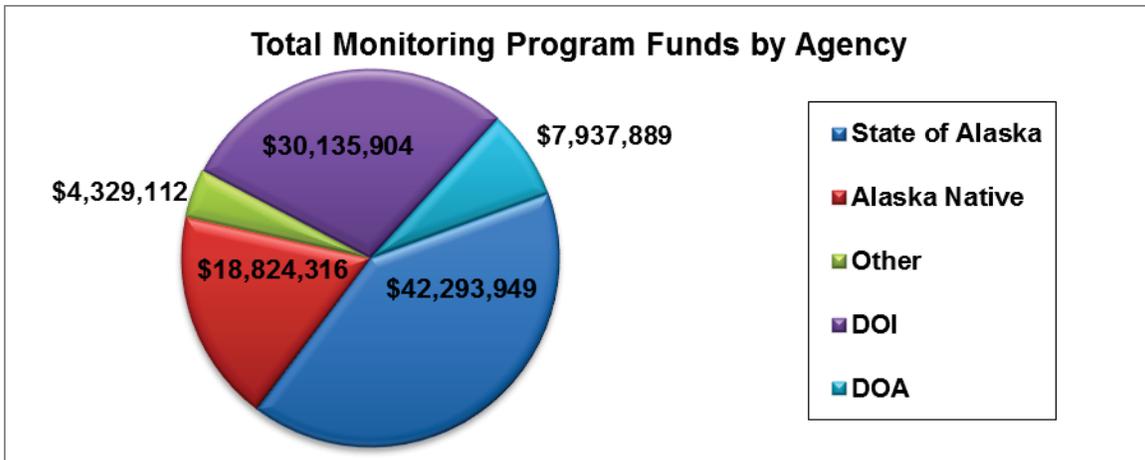


Figure 2. Total Project funds through the Monitoring Program from 2000 through 2014 listed by the organization of the Principal Investigator for projects funded. The funds listed are the total approved funds from 2000 to 2014. DOI = Department of Interior and DOA = Department of Agriculture.

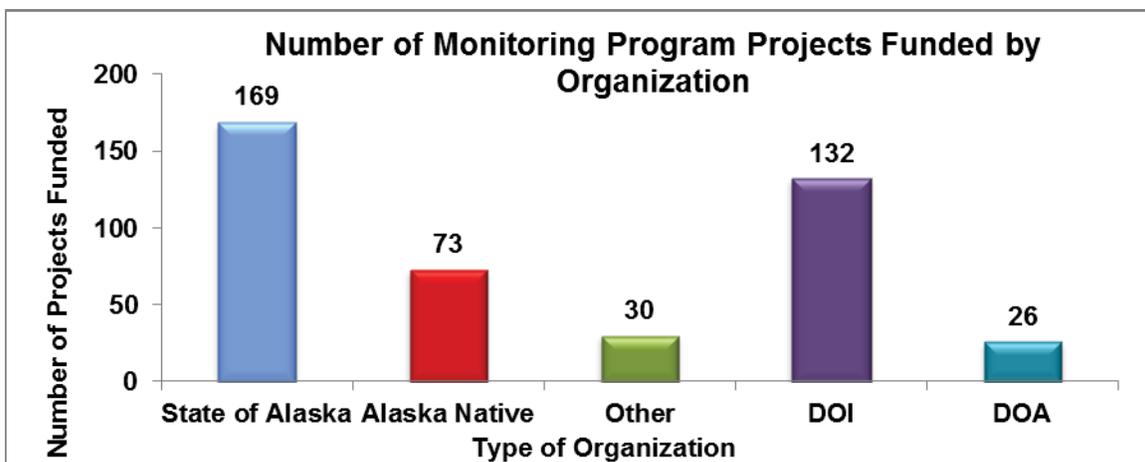


Figure 3. The total number of projects funded through the Monitoring Program from 2000 through 2014 listed by the organization of Principal Investigator. DOI = Department of Interior and DOA = Department of Agriculture.

During each biennial funding cycle, the Monitoring Program budget funds ongoing multi-year projects (2, 3 or 4 years) as well as new projects. Budget guidelines are established by geographic region (**Table 1**) and data type. The regional guidelines were developed using six criteria that included level of risk to species, level of threat to conservation units, amount of subsistence needs not being met, amount of information available to support subsistence management, importance of a species to subsistence harvest and level of user concerns with subsistence harvest. Budget guidelines provide an initial target for planning; however they are not final allocations and will be adjusted annually as needed (**Figure 5**; **Figure 6**).

Table 1. Regional allocation guideline for Fisheries Resource Monitoring Funds.

Region	Department of Interior Funds	Department of Agriculture Funds
Northern	17%	0%
Yukon	29%	0%
Kuskokwim	29%	0%
Southwest	15%	0%
Southcentral	5%	33%
Southeast	0%	67%
Inter-regional	5%	0%

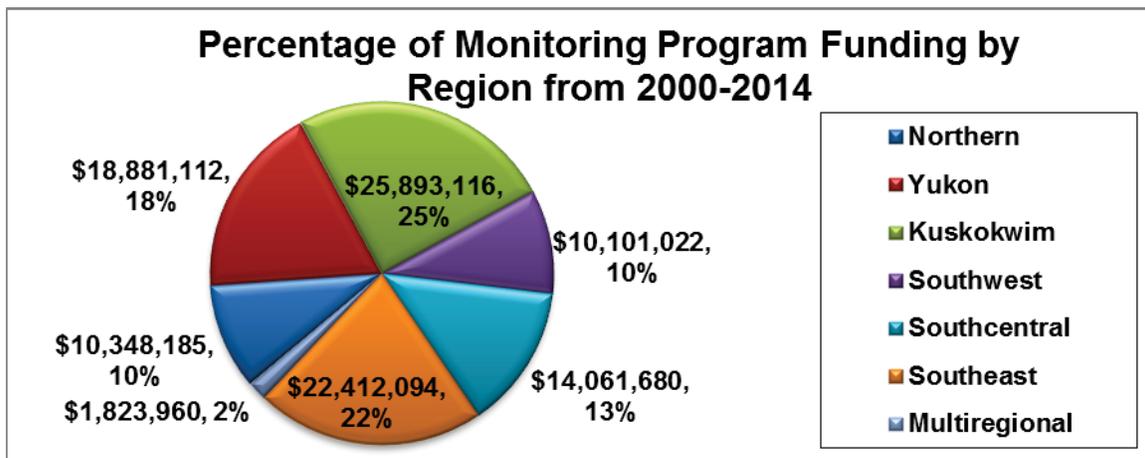


Figure 4. Total Project funding by Geographic Region from 2000 through 2014.

Two primary types of research projects are solicited for the Monitoring Program including Harvest Monitoring/Traditional Ecological Knowledge (HMTEK) and Stock, Status and Trends (SST), although projects that combine these approaches are also encouraged. Project funding by type is shown in **Figure 5**. Definitions of the two project types are listed below:

- **Stock Status and Trends Studies (SST)** - These projects address abundance, composition, timing, behavior, or status of fish populations that sustain subsistence fisheries with linkage to Federal public lands.
- **Harvest Monitoring and Traditional Ecological Knowledge (HMTEK)** - These projects address assessment of subsistence fisheries including quantification of harvest and effort, and description and assessment of fishing and use patterns.

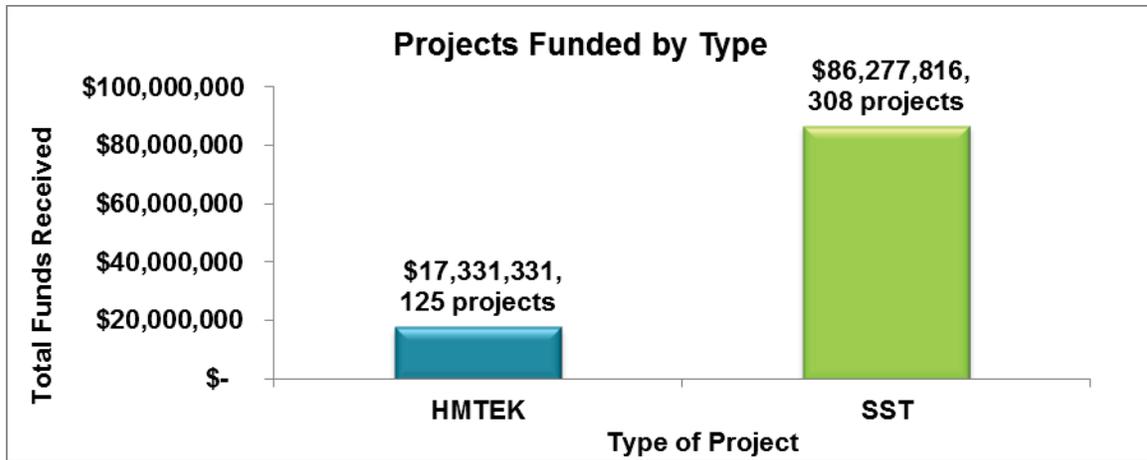


Figure 5. Total Project funding by type from 2000 through 2014. HMTEK = Harvest Monitoring/Traditional Ecological Knowledge and SST = Stock, Status and Trends.

PROJECT EVALUATION PROCESS

In the current climate of increasing conservation concerns and subsistence needs, it is imperative that the Monitoring Program prioritizes high quality projects that address critical subsistence questions. Several changes were implemented in the 2016 Monitoring Program to address the challenges facing Federal subsistence users across the state. These changes will enhance the Monitoring Program by increasing overall program transparency, identifying and funding high quality and high priority research projects and maximizing funding opportunities. This will allow the Monitoring Program to make substantial contributions to Federal subsistence users and to the Federal Subsistence Management Program.

Projects are selected for funding through an evaluation and review process that is designed to advance projects that are strategically important for the Federal Subsistence Program, technically sound, administratively competent, promote partnerships and capacity building, and are cost effective. Projects are evaluated by a panel called the Technical Review Committee (TRC). This committee is a standing interagency committee of senior technical experts that is foundational to the credibility and scientific integrity of the evaluation process for projects funded by the Monitoring Program. The TRC reviews, evaluates, and make recommendations about proposed projects, consistent with the mission of the Monitoring Program. Fisheries and Anthropology staff from the OSM provide support for the TRC. Recommendations from the TRC provide the basis for further comments from Councils, the public, the Interagency Staff Committee (ISC), and the Federal Subsistence Board, with final approval of the Monitoring Plan by the Assistant Regional Director of OSM.

The 2016 Monitoring Program changes involve how projects are submitted and also how they are reviewed. To be considered for funding under the Monitoring Program, a proposed project must have a linkage to Federal subsistence fishery management. This means that a proposed project must have a direct association to a Federal subsistence fishery, and that either the subsistence fishery or fish stocks in question must occur in or pass through waters within or adjacent to Federal public lands. Complete project packages need to be submitted on time and must address five specific criteria (see below) in order to be considered a high quality project. Addressing only some of the criteria will not guarantee a

successful project submission. Additionally, project review has been changed to aid transparency and consistency throughout the process. Key modifications include specific guidelines for assessing how and whether a proposed project has addressed each of the five criteria, receiving a single consolidated review from each participating agency, and requiring that agencies recuse themselves from providing reviews for projects involving their agency.

Five criteria are used to evaluate project proposals:

1. **Strategic Priority** - Studies must be responsive to identified issues and priority information needs. All projects must have a direct linkage to Federal public lands and/or waters to be eligible for funding under the Monitoring Program. To assist in evaluation of submittals for projects previously funded under the Monitoring Program, investigators must include a synthesis of project findings in their investigation plans. This synthesis should clearly and concisely document project performance, key findings, and uses of collected information for Federal subsistence management.
 - a. *Federal linkage* – Study must have a direct association to a subsistence fishery within Federal Subsistence Management Program jurisdiction. That is, the subsistence fishery or stocks in question must occur in waters within or adjacent to Federal public lands (National Wildlife Refuges, National Forests, National Parks and Preserves, National Conservation Areas, National Wild and Scenic River Systems, National Petroleum Reserves, and National Recreation Areas).
 - b. *Conservation Mandate* – Risk to the conservation of species and populations that support subsistence fisheries and risk to public lands purposes.
 - c. *Allocation Priority* – Risk of failure to provide for Federal subsistence uses.
 - d. *Data Gaps* – Amount of information available to support Federal subsistence management. A higher priority is given where a lack of information exists.
 - e. *Management Application* – The application of proposed project data must be clearly explained and linked to current Federal management strategies and needs.
 - f. *Role of Resource* – Importance of a species or a population to a Federal subsistence harvest (e.g. number of subsistence users affected, quantity of subsistence harvest), and qualitative significance (e.g. cultural value, unique seasonal role).
 - g. *Local Concern* – Level of user concern over Federal subsistence harvests (e.g., allocation, competing uses, changes in populations).
2. **Technical-Scientific Merit** - Technical quality of the study design must meet accepted standards for information collection, compilation, analysis, and reporting. Studies must have clear

objectives, appropriate sampling design, correct analytical procedures, and specified progress, annual and final reports.

3. **Investigator Ability and Resources** - Investigators must demonstrate that they are capable of successfully completing the proposed study by providing information on the ability (training, education, and experience) and resources (technical and administrative) they possess to conduct the work. Applicants who have received funding in the past will be evaluated and ranked on their past performance, including meeting deliverable deadlines. A record of failure to submit reports or delinquent submittal of reports will be taken into account when rating investigator ability and resources.
4. **Partnership-Capacity Building** - Partnerships and capacity building are priorities of the Monitoring Program. ANILCA mandates that rural residents be afforded a meaningful role in the management of Federal subsistence fisheries, and the Monitoring Program offers opportunities for partnerships and participation to local residents in monitoring and research. Investigators are requested to include a strategy for integrating local capacity development in their investigation plans. Investigators must not only inform communities and regional organizations in the area where work is to be conducted about their project plans, but must also consult and communicate with local communities to ensure that local knowledge is utilized and concerns are addressed. Letters of support from local organizations add to the strength of a proposal. Investigators and their organizations should demonstrate their ability to maintain effective local relationships and commitment to capacity building. This includes a plan to facilitate and develop partnerships so that investigators, communities, and regional organizations can pursue and achieve the most meaningful level of involvement.

Investigators are encouraged to develop the highest level of tribal, community and regional involvement that is practical. Investigators must demonstrate that capacity building has already reached the communication or partnership development stage during proposal development. Ideally, a strategy to increase capacity to higher levels will be provided in the project proposal, recognizing, however, that in some situations sustainable or higher level involvement may not be desired or feasible by the local organizations. Successful capacity building requires developing trust and dialogue among investigators, tribes, local communities, and regional organizations. Investigators need to be flexible in modifying their work plan in response to local knowledge, issues, and concerns, and must also understand that capacity building should emphasize reciprocity and sharing of knowledge and information.

5. **Cost Benefit**

Cost/Price Factors – Applicant’s cost/price proposal will be evaluated for reasonableness. For a price to be reasonable, it must represent a price to the government that a prudent person would pay when consideration is given to prices in the market. Normally, price reasonableness is

established through adequate price competition, but may also be determined through cost and price analysis techniques.

Selection for Award – Applicant should be aware that the government shall perform a “best value analysis” and the selection for award shall be made to the Applicant whose proposal is most advantageous to the government, taking into consideration the technical factors listed above and the total proposed price across all agreement periods. Matching funds will be factored into the review process based on overall value to the government.

POLICY AND FUNDING GUIDELINES

Several policies have been developed to aid in implementing funding. These policies include:

1. Projects of up to four years duration may be considered in any year’s monitoring plan.
2. Studies must not duplicate existing projects.
3. A majority of Monitoring Program funding will be dedicated to non-Federal agencies.
4. Long term projects will be considered on a case by case basis.
5. Activities that are not eligible for funding include:
 - a) habitat protection, mitigation, restoration, and enhancement;
 - b) hatchery propagation, restoration, enhancement, and supplementation;
 - c) contaminant assessment, evaluation, and monitoring; and
 - d) projects where the primary or only objective is outreach and education (for example, science camps, technician training, and intern programs), rather than information collection, are not eligible for funding under the Monitoring Program.

The rationale behind these policy and funding guidelines is to ensure that existing responsibilities and efforts by government agencies are not duplicated under the Monitoring Program. Land management or regulatory agencies already have direct responsibility, as well as specific programs, to address these activities. However, the Monitoring Program may fund research to determine how these activities affect Federal subsistence fisheries or fishery resources.

The Monitoring Program may fund assessments of key Federal subsistence fishery stocks in decline or that may decline due to climatological, environmental, habitat displacement, or other drivers; however applicants must show how this knowledge would contribute to Federal subsistence fisheries management. Similarly, the Monitoring Program may legitimately fund projects that assess whether migratory barriers (e.g. falls, beaver dams) significantly affect spawning success or distribution; however, it would be inappropriate to fund projects to build fish passes, remove beaver dams, or otherwise alter or enhance habitat.

2016 FISHERIES RESOURCE MONITORING PLAN

For 2016, a total of 46 investigation plans were received and 45 are considered eligible for funding (**Table 1**). One project was not eligible for funding because the project falls under habitat mitigation, restoration, and enhancement. Of the projects that are considered for funding, 33 are SST projects and 13 are HMTEK projects.

In 2016, the Department of the Interior, through the U.S. Fish and Wildlife Service, will provide up to \$2.0 million in funding and up to \$2.7 million for ongoing projects that were initially funded in 2014. The Department of Agriculture, through the U.S. Forest Service, has historically provided \$1.8 million annually, but the amount of 2016 funds available projects is uncertain. If the Department of Agriculture funding is not provided, none of the proposed projects submitted for the Southeast Region will be funded.

FISHERIES RESOURCE MONITORING PROGRAM SOUTHCENTRAL OVERVIEW

Since the inception of the Monitoring Program in 2000, 49 projects have been undertaken in the Southcentral category for a total of \$14.1 million (**Figure 1**). Of these, the State of Alaska conducted 12 projects, the Department of Interior conducted 17 projects, Alaska Native organizations have conducted 15 projects, the Department of Agriculture has conducted three projects, and other organizations conducted two projects (**Figure 2**). Of these projects 38 projects were Stock, Status, and Trends (SST), and 11 projects were Harvest Monitoring and Traditional Ecological Knowledge (HMTEK).

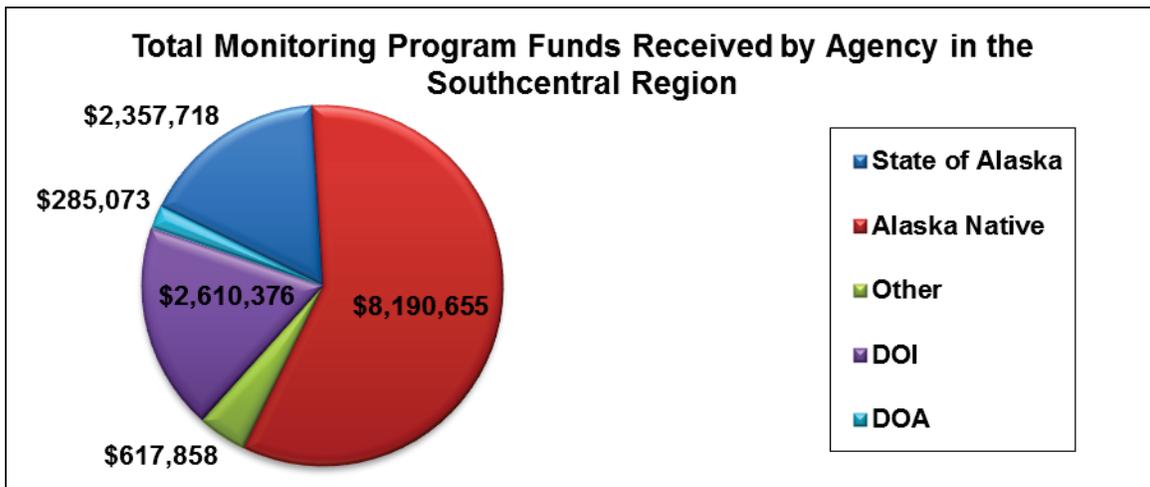


Figure 1. Monitoring Program funds received by agencies for projects in the Southcentral Region. The funds listed are the total approved funds from 2000 to 2014. DOI = Department of Interior and DOA = Department of Agriculture.

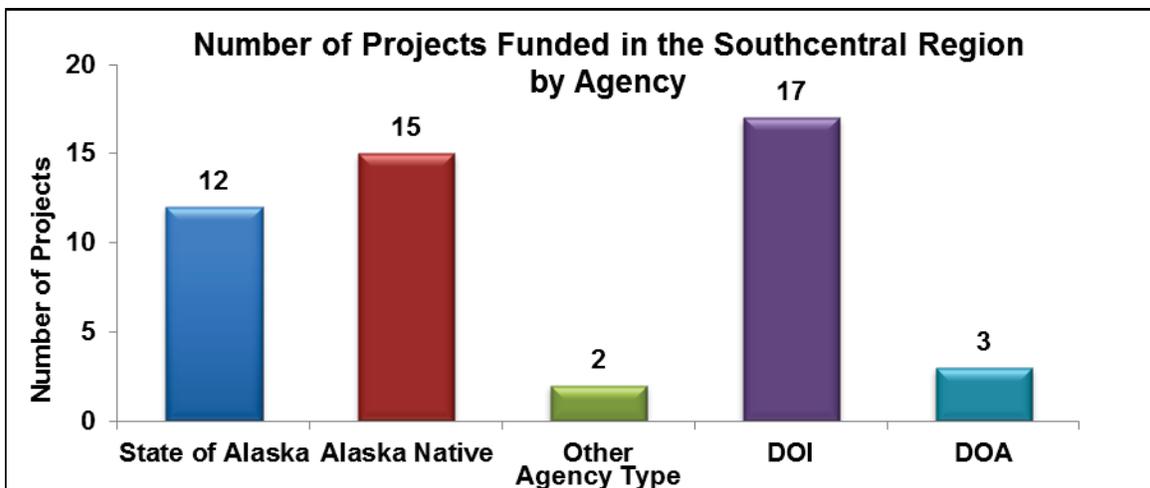


Figure 2. Total number of Monitoring Program projects funded, by agency, in the Southcentral from 2000 to 2014. DOI = Department of Interior and DOA = Department of Agriculture

2016 DRAFT SOUTHCENTRAL FISHERIES RESOURCE MONITORING PLAN

OVERVIEW

Priority Information Needs

The 2016 Notice of Funding Opportunity for the Southcentral Region identified three priority information needs:

- Obtain reliable estimates of Chinook and sockeye salmon escapement into the Copper River drainage (for example, projects utilizing weir, sonar, mark-recapture methods).
- Abundance, run timing, spawning site fidelity and timing, and age, sex, and length composition for Chinook and coho salmon that stage or spawn in waters of the Kenai River and its tributaries below Skilak Lake under Federal subsistence fisheries jurisdiction.
- Abundance, run timing, spawning site fidelity and timing, and age, sex, and length composition for Chinook and coho salmon that stage or spawn in waters of the Kasilof River and its tributaries under Federal subsistence fisheries jurisdiction.
- Assessment of Ibeck Creek coho salmon harvest and escapement.
- Change in subsistence-user attitude concerning the harvest of salmon since the establishment of the Russian River dipnet fishery, including: dependence on the fish as a food source; the significance of sharing, barter, and customary trade; harvest methods (including methods of access); and, processing/preservation methods.

Available Funds

Federal Subsistence Board guidelines direct initial distribution of funds among regions and data types. While regional budget guidelines provide an initial target for planning, they are not original allocations. Prior commitments to the 2014 Monitoring Program are up to \$2.7 million. The anticipated funding available for the 2016 Monitoring Program are up to \$2.0 million.

Technical Review Committee Proposal Ranking

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

For the 2016 Monitoring Program, six proposals were submitted for the Southcentral Region. The Technical Review Committee evaluated and scored each proposal for Strategic Priority, Technical and Scientific Merit, Investigator Ability and Resources, Partnership and Capacity Building, and Cost/Benefit. The final score determined the ranking of each proposal within the region (**Table 1**). Projects that rate

higher comprise a strong Monitoring Plan for the region by addressing strategically important information needs based on sound science and promote cooperative partnerships and capacity building. The projects listed are currently being considered for Funding in the 2016 Fisheries Resource Monitoring Program. Projects which were not eligible due to the nature of the activity are not included. For more information on projects submitted to the 2016 Fisheries Resource Monitoring Program please see the Executive Summaries in **Appendix A**.

Table 1. Technical Review Committee (TRC) ranking for projects in the Southcentral Alaska Region. Projects are listed by TRC ranking and include the total matching funds, total funds requested, and the average annual request for each project submitted to the 2016 Monitoring Program within the Southcentral Alaska Region. The projects listed are currently being considered for Funding in the 2016 Fisheries Resource Monitoring Program. Projects which were not eligible due to the nature of the activity are not included.

TRC Ranking	Project Number	Title	Total Matching Funds	Total Project Request	Average Annual Request
1	16-551	Subsistence Users' Attitudes and Perceptions in the Russian River Dip Net Fishery	\$26,952	\$99,441	\$33,147
2	16-503	Ibeck Creek Coho Salmon Escapement and Harvest Monitoring Program	\$173,544	\$959,570	\$239,893
3	16-552	Chitina Check Station (Copper River in season data on Chinook and Sockeye Salmon Harvest)			
4	16-501	Abundance, run timing, and age, sex, and length compositions of Chinook Salmon in the Killey and Funny rivers, Kenai Peninsula, Alaska	\$227,686	\$436,660	\$145,553
5	16-505	Stock Assessment of Late Run Kasilof River Chinook Salmon	\$289,600	\$827,046	\$206,762
6	16-502	Age, sex, length, run time, spawning site fidelity and distribution of Chinook Salmon within Federal waters of the mainstem Kenai River, Kenai Peninsula, Alaska	\$227,172	\$580,706	\$193,569
Total			\$944,954	\$2,903,423	\$818,924

2016 PROJECT SUMMARY AND TRC JUSTIFICATION FOR PROJECT RANKING

TRC RANKING: 1

Project Number: 16-551

Project Title: Subsistence Users' Attitudes and Perceptions in the Russian River Dip Net Fishery

Project Summary: The focus of this research is to document the contemporary subsistence dipnet fishery in Cooper Landing, Hope, and Ninilchik, including methods of access to harvest locations, seasonality of fish harvest, processing of the harvest, and interactions with other anglers. This project will also explore the topic of customary trade with fisheries participants. Understanding how the current fishery operates and the attitudes and perceptions of the fishery by residents will aid in the management of the fishery. This project addresses a Monitoring Program priority information need for 2016.

Justification: The focus of this research is to document the contemporary subsistence dipnet fishery in Cooper Landing, Hope, and Ninilchik, including methods of access to harvest locations, seasonality of fish harvest, processing of the harvest, and interactions with other anglers. This project will also explore the topic of customary trade with fisheries participants. Understanding how the current fishery operates and the attitudes and perceptions of the fishery by residents will aid in the management of the fishery.

TRC Ranking: 2

Project Number: 16-503

Project Title: Ibeck Creek Coho Salmon Escapement and Harvest Monitoring Program

Project Summary: The investigator proposes using a weir to estimate Coho Salmon escapement in Ibeck Creek and a creel survey to estimate harvest and angler characteristics. Estimates from the weir can be used to evaluate the accuracy of Coho Salmon aerial surveys on the Copper River Delta. A creel survey will be used to evaluate harvest levels and collect angler data. The investigator will continue to work with Alaska Department of Fish and Game to ensure data from both the weir and creel survey is collected in a manner that can be used for management decisions. This project is technically sound and addresses an important subsistence resource associated with the Chugach National Forest. The investigator has the expertise needed to successfully conduct this ongoing project. He and his agency have successfully completed several successful Monitoring Program projects in a timely manner.

Justification: The investigator proposes using a weir to estimate Coho Salmon escapement in Ibeck Creek and a creel survey to estimate harvest and angler characteristics. Estimates from the weir can be used to evaluate the accuracy of Coho Salmon aerial surveys on the Copper River Delta. A creel survey will be used to evaluate harvest levels and collect angler data. The investigator will continue to work with Alaska Department of Fish and Game to ensure data from both the weir and creel survey is collected in a manner that can be used for management decisions. This project is technically sound and addresses an important subsistence resource associated with the Chugach National Forest. The investigator has the expertise needed to successfully conduct this ongoing project. He and his agency have successfully completed several successful Monitoring Program projects in a timely manner.

TRC Ranking: 3

Project Number: 16-552

Project Title: Chitina Check Station (Copper River in season data on Chinook and Sockeye Salmon Harvest)

Project Summary: This 4-year project proposes to establish a voluntary reporting station in order to collect in season harvest data for Chitina area salmon fisheries. As participation in the Chitina Area fisheries increase, up river communities are concerned that their harvest will require greater effort and that up river escapement will decline. The proposal demonstrates strong capacity building and partnership and has clear implications for Federally qualified subsistence users. However, it does not address a Monitoring Program priority information need. Past research efforts like the “Validity Assessment of Permit Estimates of Copper River Subsistence Salmon Harvests” Monitoring Program project No. 10-552 describe a harvest estimate process that is tightly run with few avenues for error of any magnitude or management concern. The sockeye salmon runs remain strong and the current harvest and escapement levels sustainable. In addition, it is unclear how the project can ensure enough voluntary participation to generate meaningful data, and key staff responsible for the development of a data collection, analysis, and reporting process are not yet hired or identified thus the process cannot be analyzed by reviewers for scientific merit. Finally, the cost is not sufficient for the work being proposed.

Justification: This 4-year project proposes to establish a voluntary reporting station in order to collect in season harvest data for Chitina area salmon fisheries. As participation in the Chitina Area fisheries increase, up river communities are concerned that their harvest will require greater effort and that up river escapement will decline.

The proposal demonstrates strong capacity building and partnership and has clear implications for Federally qualified subsistence users. However, it does not address a Monitoring Program priority information need. Past research efforts like the “Validity Assessment of Permit Estimates of Copper River Subsistence Salmon Harvests” Monitoring Program project No. 10-552 describe a harvest estimate process that is tightly run with few avenues for error of any magnitude or management concern. The sockeye salmon runs remain strong and the current harvest and escapement levels sustainable. In addition, it is unclear how the project can ensure enough voluntary participation to generate meaningful data, and key staff responsible for the development of a data collection, analysis, and reporting process are not yet hired or identified thus the process cannot be analyzed by reviewers for scientific merit. Finally, the cost is not sufficient for the work being proposed.

TRC Ranking: 4

Project Number: 16-501

Project Title: Abundance, run timing, and age, sex, and length compositions of Chinook Salmon in the Killey and Funny rivers, Kenai Peninsula, Alaska

Project Summary: This proposal requests to fund two weirs that will enumerate and collect biological information on Chinook Salmon that spawn in the Killey and Funny rivers during 2016 and 2017. With current declines in Chinook Salmon returns to the Kenai River, the subsistence Chinook Salmon fisheries have either closed or have been severely restricted. The Killey and Funny river weir projects are the only up river assessment projects that provide necessary information to check the accuracy of the escapement information collected in lower Kenai River projects. The project specifically addresses a priority information need in the 2016 Notice of Funding Opportunity.

Justification: In the Notice of Funding Availability and Application Instructions, in the Basic Eligibility Requirements, it specifically states that submissions should be for a single project and not joint or combined projects. Each weir should be an independent project submission.

This project specifically addresses the priority information need that was identified by the South Central Regional Advisory Council for the 2016 Monitoring Program. The Killey and Funny Rivers are located within Federal public waters, are the primary tributaries to the Kenai River that support spawning early-run Chinook Salmon, and is a subsistence resource for Federally qualified subsistence users from Ninilchik, Cooper Landing, and Hope.

The Killey and Funny river weirs have been operated by the U.S. Fish and Wildlife Service; however funding for these projects is ending and it is unclear as to why the funding for these projects is ending. Because this is an established project the methods have a proven ability to achieve technical results, it has proven science and logistics, and has a rigorous sampling design for this area and species; in addition the objectives are clear, measurable, and achievable. For the project to be successful the information collected by this project should have a strong nexus with on-going projects in the area and should tie into existing research. The project will provide information that on the early-run Kenai River Chinook Salmon population; however there is not a strong link to on-going projects in the area.

The cost of the proposal is slightly high; however it does cover the cost of two weirs. The project is requesting salary and fringe benefits for five positions: one GS-6 (six months 2016 and 2017 and two months in 2018); two GS-5 technicians (six months in 2016 and 2017); permanent GS-7 (1.8 months 2016, 2017, and 2018); and for the principle investigator (two months in 2016, 2017, and 2018). The GS-7 Fishery Technician is slated to work on project 16-502 for three months in 2016 and 2017 and for one month in 2018. Both weirs are only operating for 2.5 months and the technician hires should only be long enough to complete the needed training, weir installation, and weir breakdown. Due to the importance of Kenai River Chinook Salmon to multiple user groups the principle investigator should explore ways to find a partner and matching funds to lower the cost of the project.

The budget does not include enough detail to be evaluated. Further explanation of the budget is warranted and could have been covered in the Budget Justification; however a Budget Justification was not included in the proposal package. In the Notice of Funding Availability and Application Instructions it specifically states that a Budget Justification is a required document and is on the check-list for required documents.

This project does not work identify a way to build partnerships or capacity within rural, Alaska Native, or Tribal organizations. In addition, there is no discussion of local hire, ANSEP students, or rural student interns. If this project is to be funded the PI should look at ways to build partnerships or capacity.

TRC Ranking: 5

Project Number: 16-505

Project Title: Stock Assessment of Late Run Kasilof River Chinook Salmon

Project Summary: This project specifically addresses a 2016 Monitoring Program Priority Information need by providing an estimate of the in river abundance of wild, age-2+ Chinook Salmon in the Kasilof River from 20 June through 31 August, through a mark recapture-study. Investigators propose to estimate the proportion, by age and sex, of Kasilof River late-run chinook salmon. In addition, the number of Chinook Salmon that are present in Kenai National Wildlife Refuge waters will be reported by day of year. The Principal Investigator states that the project is needed because the study completed during 2005 to 2008 when was abundance of late-run Chinook Salmon was likely higher than current levels and that it is unknown how their results might compare to the current abundance levels. However, it is unlikely that run-timing or spawning site fidelity would be affected by a decreased abundance and that this project would provide new information that would have management implications.

Justification: This project specifically addresses the priority information need, Abundance, run timing, spawning site fidelity and timing, and age, sex, and length composition for Chinook and coho salmon that stage or spawn in waters of the Kasilof River and its tributaries under federal subsistence fishery jurisdiction that was identified by the South Central Regional Advisory Council for the 2016 Monitoring Program. The Principle Investigator states that the project is needed because the study completed during 2005 to 2008 when was abundance of late-run Chinook Salmon was likely higher than current levels and that it is unknown how their results might compare to the current abundance levels.

It is unlikely that run-timing or spawning site fidelity has changed since 2008 due to a decreased abundance. It is not certain this project will provide any new information that will have management implications. The project could be used in concert with other assessment projects to monitor the population, evaluate current assessment tools, and/or validate past research on Kasilof River Chinook Salmon. The project has a comprehensive plan for completing progress, annual and final reports.

The project has an average annual request of \$275,682. The project has a total match of \$289,600. This brings the total cost of the project to \$1,116,646 and the average annual cost to \$372,215. The cost of the project is high and appears to be due from personnel (requested \$573,606 and matching \$188,100) and equipment costs (requested \$180,000 and matching \$101,500).

The U.S. Fish and Wildlife Service is requesting \$24,500 for the to purchase a new boat, trailer, and a boat motor (jet) and the Alaska Department of Fish and Game is requesting \$6,500 for the purchase a new boat motor (jet). Due to the proposal not having a budget justification there is no supporting justification on this equipment is needed to operate the project and why either agency does not have one available.

The project proposal is requesting funds to cover salary and fringe benefits for seven positions; with four positions placed with the U.S. Fish and Wildlife Service and three positions with the Alaska Department of Fish and Game. The Service is requesting salary and fringe benefits five positions: Term Biologist at a GS-7 position (8 months for 2016, 2016, 2018); Permanent Biologist at a GS 9/11 (2 months for 2016, 2016, 2018); GS-5 (4 months for 2016, 2016, 2018); and a GS-6 (4 months for 2016, 2016, 2018). The U.S. Fish and Wildlife Service will be responsible for the capture and marking component of the study which runs from 1 July to 31 August and that a two-person crew will conduct sampling for 6.5 hours per day. Therefore it is unclear as to what the four positions the U.S. Fish and Wildlife Service is requesting funds for. In addition to the position they are requesting funds for, they providing a position for the same costs as in-kind. It is unclear why there are two biologists needed to run the project; however it is good that the U.S. Fish and Wildlife Service and the Alaska Department of Fish and Game are partnering.

The Alaska Department of Fish and Game is requesting funds for three positions: Fishery Biologist II (3 months for 2016, 2016, 2018); Fish and Wildlife Technician III (4 months for 2016, 2016, 2018); and Fish and Wildlife Technician III (3 months for 2016, 2016, 2018). The ADF&G will be responsible for the recapture and radio-telemetry component of the study from 15 July to 25 September and will use a two-person crew for capturing Chinook Salmon during the recapture event three days per week for 6.5 hours per day.

The Service has \$35,000 listed for matching funds under personnel however there is no description. That would make a total of \$464,606 of funds used to cover personnel costs for the U.S. Fish and Wildlife Service and the U.S. Fish and Wildlife Service is not completing all aspects of the project. It appears that ADF&G's matching personnel funds are the exact same as what is listed for the funds being requested to cover the Fishery Biologist II for three months in 2016, 2016, and 2018.

Further explanation of the budget is warranted. This information could have been covered in the Budget Justification; however a Budget Justification was not included in the proposal package. In the Notice of Funding Availability and Application Instructions it specifically states that a Budget Justification is a required document and is on the check-list for required documents.

This project does not attempt to develop partnerships within rural, Alaska Native, or Tribal organizations. In addition, there is no discussion of local hire, ANSEP students, or rural student interns.

TRC Ranking: 6

Project Number: 16-502

Project Title: Age, sex, length, run time, spawning site fidelity and distribution of Chinook Salmon within Federal waters of the mainstem Kenai River, Kenai Peninsula, Alaska

Project Summary: Kenai River Chinook Salmon escapement has recently declined to historic lows and as a result all fisheries for Chinook Salmon, including the subsistence fishery, have either closed or have been severely restricted. This project will provide information on spawning destination, run timing, site

fidelity, estimating age and sex composition, and estimating the mean length by age and sex of Kenai River Chinook Salmon through a radio telemetry study. The project will focus on the early-run population that spawn in the first 8 rkm below the outlet of Skilak Lake. This project partially addresses a priority information need identified for the 2016 Monitoring Program.

Justification: Kenai River Chinook Salmon escapement has recently declined to historic lows and as a result all Chinook Salmon fisheries including the subsistence fishery have either closed or have been severely restricted. This project partially addresses a 2016 Monitoring Program priority information need. This project has a federal linkage and has Federal jurisdiction. The majority of early-run Chinook salmon that return to the Kenai River spawn within the Kenai National Wildlife Refuge and are available for harvest in the Federal subsistence fishery; however due to recent declines the Federal subsistence fishery has been closed to the harvest of Chinook Salmon.

The objectives for this study are clear, measurable, and achievable; however it is not certain if this study will contribute new information on Kenai River Chinook Salmon. Chinook Salmon distribution in the Kenai River has been examined by radio telemetry studies during the early 1980's, early 1990's, and from 2010 to 2014 and each study had similar results. This project may not answer immediate subsistence or conservation concerns. This project could be used in concert with other assessment projects to monitor the population and compared with past studies that were addressed under Strategic Priority; however it is unlikely that this project will collect new information.

The results from this study will be compared to past studies; however it is not certain if this study will contribute new information on early-run Kenai River Chinook Salmon that will have management implications or advance knowledge in regards to spawning timing, run timing, site fidelity and ASL compositions. The Alaska Department of Fish and Game is currently analyzing their findings from a study completed recently on Chinook Salmon abundance and migratory timing. This information should be available in the next year and should provide valuable information on the differences seen recently in regards to Chinook Salmon run timing, abundance, and spawning timing.

The average annual cost of the project is \$193,568.67. The cost of the project is high and appears to be due from personnel costs and contractual. The proposal is requesting salary and fringe benefits for six positions: two GS-5 positions (six months each in 2016 and 2017); two GS-6 positions (six months each in 2016 and 2017 and one month each in 2018); GS 7 Fishery Technician (three months in 2016 and 2017 and for one month in 2018); and the principle investigator (two months in 2016, 2017, and 2018). The GS-7 position is also slated to work on the Killey and Funny river weirs for project 16-501, if funded, for 1.8 months in 2016, 2017, and 2018.

In 2018, no field work will be completed so it is not clear why funds are needed for the two GS-6 positions and the GS-7 position during that year. The budget has listed \$88,922 as matching funds for permanent personnel; however there is no description on which personnel will be providing services for this project. The budget also requests \$80,000 in 2016 and 2017 for Radio Transmitters under contractual costs; however it is unclear as to what and how much of the equipment will be purchased.

Further explanation of the budget is warranted and could have been covered in the Budget Justification; however a Budget Justification was not included in the proposal package. In the Notice of Funding Availability and Application Instructions it specifically states that a Budget Justification is a required document and is on the check-list for required documents.

This project does not attempt to build partnerships with rural, Alaska Native, or Tribal organizations. In addition, there is no discussion of local hire, ANSEP students, or rural student interns. If this project is to be funded the principle investigator should look at ways to build partnerships or capacity within rural, Alaska Native, or Tribal organizations and/or hire local hire, ANSEP students, or rural student interns. The Fisheries Resource Monitoring Program works to integrate Alaska Native and rural organizations into the management of subsistence fisheries by having the level of rural involvement as one of the criteria for evaluating investigation plans. The Principle Investigator can work with the Office of Subsistence Management to incorporate partnerships and capacity building into the proposed work.

APPENDIX A

The following Executive Summaries were written by the Principle Investigators and submitted to the Office of Subsistence Management as part of the proposal package. The statements and information contained in the Executive Summaries were not altered and they may not reflect the opinions of the Office of Subsistence Management or the Technical Review Committee. The Executive Summaries listed are for projects that are currently being considered for Funding the 2016 Fisheries Resource Monitoring Program. Projects which were not considered for funding were not eligible due to the nature of the activity and are not included in this appendix.

Project Number: 16-501
Title: Abundance, run timing, and age, sex, and length compositions of Chinook Salmon in the Killey and Funny rivers, Kenai Peninsula, Alaska.
Geographic Region: Southcentral Region–Cook Inlet–Kenai Peninsula–Kenai River
Information Type: Stock Status and Trends
Principal Investigator(s): Kenneth S. Gates, U.S. Fish and Wildlife Service, Kenai Fish and Field Office

Project Cost:	2016: \$181,213	2017: \$197,149	2018: \$58,298	2019: \$0
Total Cost: \$436,660				

Issue Addressed: This project specifically addresses priority Chinook Salmon *Oncorhynchus tshawytscha* issues and information needs identified by the Southcentral Regional Advisory Council for southcentral Alaska’s Kenai River. There is currently a deficit of information and several issues pertaining to the abundance, run timing, spawn timing, site fidelity, and age, sex, and length compositions of Chinook Salmon managed under federal subsistence fishery jurisdiction below Skilak Lake in the Kenai River watershed. Escapement of Chinook Salmon in the Kenai River watershed has recently declined to historic lows and as a result fisheries have either closed or have been severely restricted. Because of the closures and consequential impacts to the fisheries and local communities, the assessment programs (i.e., lower Kenai River Chinook Salmon sonar; lower Kenai River test-net fishery, and lower Kenai River harvest and creel surveys) used to implement the fisheries has undergone much scrutiny. Fishers are demanding a high level of accuracy from these programs and currently the Killey and Funny river weir projects are the only up river assessment projects that provide the necessary information to check the accuracy of the information collected in the lower Kenai River. The information obtained from the Killey and Funny river weir projects has been significant to recent changes in Chinook Salmon management (e.g., changes to the Kenai River sonar estimates and test-net program) warranting their continuation.

To date, funding for the Killey and Funny river weirs has been provided by the U.S. Fish and Wildlife Service, Fisheries and Ecological Services. This funding is set to expire during 2015. Continuation of these projects beyond 2015 will provide necessary and valuable information pertaining to abundance, run timing, and age, sex, length and genetic compositions of individual Chinook Salmon spawning

populations within Federal waters. These projects will provide the only assessment of accuracy for lower Kenai River assessment projects which are crucial to implementing up river subsistence fisheries. The information collected from these projects affect lower Kenai River abundance estimates, run reconstruction models used to establish escapement goals, and the detection of change to age, sex and length compositions. The information will help ensure the sustainability of Kenai River Chinook salmon and implementation of future fisheries including federal subsistence fisheries.

Objective(s):

1. Enumerate the daily escapement and describe the run timing of adult Chinook Salmon passing fish weirs equipped with underwater video systems located in the Killey and Funny Rivers;
2. Estimate the overall age and sex composition of the Chinook Salmon escapement into the Killey and Funny rivers such that the estimates for each group are within 10 percentage points of the true values 95% of the time;
3. Estimate the mean length of Chinook Salmon in the Killey and Funny rivers by sex and age.

Methods: A resistance board weir and underwater video system will be operated in the Killey and Funny rivers from May 24 to August 8 and May 10 to August 5 each year between 2016 and 2017, respectively. Upstream fish passage will be monitored using a live trap and underwater video monitoring system. The live trap facilitates biological sampling and is attached upstream of the fish passage panel. The video systems, consisting of a sealed camera boxes and fish passage chutes, are attached upstream of the live traps. Setup and design of the video systems have been used by the investigator to enumerate salmon and trout in various rivers throughout southcentral Alaska since 2004.

Adult Chinook Salmon will be randomly sampled for age, sex, length, and genetic tissue. Sampling will take place in near proportion to daily and weekly fish passage resulting in greater samples during periods of high escapement. Age and sex composition for the total escapement will be estimated directly from the age and sex composition in the sample. Abundance estimates and their variances will be summed to estimate overall age and sex-specific escapements for the season. Basic data summaries, scatter plots, bar graphs, and statistical analyses (i.e., means, standard errors, and ranges) will be used to describe the length distribution of Chinook Salmon sampled at the Killey and Funny river weirs.

Partnerships and Capacity Building: Portions of this study has been ongoing since 2006. Since then, many individuals from within and outside the local commuting area have either participated in the project or have been educated in a variety of ways. For example, the Funny River weir has been used to educate local youth groups and school kids, it has been filmed on a nationally syndicated TV show “Aqua Kids” and aired on national television, and has been a topic of discussion on local news channels. Information collected from this study is routinely discussed by Alaska residents, NGO’s, various fishing groups, and fishery managers at local and statewide meetings (e.g., State Board of Fish meetings and local fish and game Advisory Council meetings). This study has been discussed in great detail with the Kenai National Wildlife Refuge and has full support of the Alaska Department of Fish and Game. The KFWFO will be the primary party responsible for the study. The Refuge will provide administrative and logistical support

such as fixed-wing aircraft support when needed for field activities. The Department is likely to assist the Service with weir and video installations and possibly some logistics throughout the season.

Project Number: 16-502
Title: Age, sex, length, run time, spawning site fidelity and distribution of Chinook Salmon within Federal waters of the mainstem Kenai River, Kenai Peninsula, Alaska
Geographic Region: Southcentral Region–Cook Inlet–Kenai Peninsula–Kenai River
Information Type: Stock Status and Trends
Principal Investigator(s): Kenneth S. Gates, U.S. Fish and Wildlife Service, Kenai Fish and Wildlife Field Office
Co-Investigator: Ken C. Harper, U.S. Fish and Wildlife Service, Kenai Fish and Wildlife Field Office

Project Cost:	2016: \$275,603	2017: \$267,749	2018: \$37,354	2019: \$0
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Total Cost: \$580,706

Issue Addressed: This project specifically addresses priority Chinook Salmon *Oncorhynchus tshawytscha* issues and information needs identified by the Southcentral Regional Advisory Council for southcentral Alaska’s Kenai River. Recent actions by the Federal Subsistence Board adopted regulations to allow a community gillnet fishery to target Sockeye Salmon *O. nerka* in waters under Federal subsistence fishery management jurisdiction on the Kenai River. This action was contrary to recommendations by the Office of Subsistence Management Staff, the Intraservice Staff Committee, and U. S. Fish and Wildlife Service (Service) Refuge Manager and Inseason Fishery Manager. Information is needed immediately to determine abundance, run timing, spawn timing, site fidelity, and age, sex, and length compositions of Chinook Salmon on waters managed under federal subsistence fishery jurisdiction below Skilak Lake in the Kenai River watershed to successfully manage a gillnet fishery for Sockeye Salmon while avoiding impacts to this important Chinook Salmon spawning aggregate.

Objective(s):

1. Determine the ultimate spawning destination for radio tagged adult Chinook Salmon upstream of rkm 66;
2. Determine the run timing and site fidelity of adult Chinook Salmon spawning within Federal waters below Skilak Lake between rkm 75 and 82;
3. Estimate the age and sex composition of adult Chinook Salmon migrating past rkm 52 in the Kenai River captured during radio tagging events in the mainstem Kenai River such that the estimates for each group are within 10 percentage points of the true values 95% of the time;
4. Estimate the mean length by sex and age of adult Chinook Salmon migrating past rkm 52 in the Kenai River captured during radio tagging events.

Methods: Radio telemetry will be used to uniquely identify and track 250 individual Chinook Salmon to their respective spawning destinations upstream of the Funny River (rkm 50). Movements of radio-tagged Chinook Salmon will be documented using a combination of fixed data-logging receiver stations and mobile tracking using boats and fixed-wing aircraft. The sample size of 250 transmitters was based on a binomial distribution model assuming 95% confidence intervals with alpha=0.05. Drift

entanglement nets will be actively fished to capture fish between rkm 52 and 66. Capturing and tagging adult Chinook Salmon between rkm 52 and 66 will help minimize tagging related mortality and effects and will maximize the number of radio tagged fish entering the study area. Capture techniques using drift entanglement nets will be similar to those used in numerous studies throughout Alaska.

Chinook Salmon will be tagged using radio transmitters that are systematically deployed between May 15 and July 10 during 2016 and 2017. Three to four radio transmitters will be deployed daily as a target goal to ensure that all allocated transmitters are deployed. Deploying radio transmitters every day in a systematic fashion reduces the possibility of disproportionately representing a single group of fish moving through the tagging area. Fixed receiver stations will be used to automatically identify and record fish movements at the mouths of the Funny and Killey rivers, the Killey River weir (if operational in 2016), and at rkm 22, 75, 82, 105, and 131. Mobile boat tracking will be conducted multiple times throughout the week between the Soldotna Bridge and Skilak Lake from the start of the project through mid-September or until motion sensors on all transmitters indicate mortality. Aerial surveys will be frequently conducted over tributaries as fish migrate to their spawning areas. Age, sex, and length (ASL) samples will be collected from each handled Chinook Salmon. Radio telemetry information collected with various tracking methods will be integrated into one georeferenced database that archives the dates, locations, and fate of radio-tagged Chinook salmon.

Partnerships and Capacity Building: Information collected from this study is routinely discussed by Alaska residents, NGO's, various fishing groups, and fishery managers at local and statewide meetings (e.g., State Board of Fish meetings and local fish and game Advisory Council meetings). This study has been discussed in great detail with the Kenai National Wildlife Refuge, and will build on information collected by the Alaska Department of Fish and Game. The KFWFO is the primary party responsible for the study. The Refuge will provide administrative and logistical support such as fixed-wing aircraft support when needed for field activities.

Project Number: 16-503
Title: Ibeck Creek Coho Salmon Escapement and Harvest Monitoring Program
Geographic Region: Southcentral
Data Type: Stock Status and Trends (SST) & Harvest Monitoring (HM)
Principal Investigator: Matt Piche - Native Village of Eyak
Co-Investigator(s): John Whissel - Native Village of Eyak;
 Milo Burcham - U.S. Forest Service, Cordova Ranger District;
 Kate Morse - Copper River Watershed Project.

Project Cost:	2016: \$242,234	2017: \$187,813	2018: \$179,552	2019: \$179,552
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Total Cost: \$ 789,151

Issue: Ibeck Creek is a tributary of the Eyak River located within the Chugach National Forest on the Copper River Delta. Ibeck Creek can be accessed via road 11 km from downtown Cordova. Due to easy access from Cordova Ibeck Creek hosts the highest used Federal subsistence and State sport fishery in the area, in which Coho Salmon *Oncorhynchus kisutch* is the primary targeted specie for both fisheries. The Federal subsistence fishery attracts local Cordovans and Tribal Members providing the only subsistence salmon fishery in the area not requiring a boat.

Over the past 8-9 years Ibeck Creek Coho Salmon aerial escapement indices have steadily plummeted and over the same period estimated sport fish harvest has increased sevenfold. The upsurge in local concern by community members, United States Forest Service Biologists and Native Village of Eyak has expanded beyond Cordova to the Southcentral Alaska Regional Advisory Council; which, as a result of the apparent evidence, the council identified the assessment of Ibeck Creek Coho Salmon harvest and escapement as a priority information need for the 2016 Fisheries Resource Monitoring Plan.

The Native Village of Eyak (NVE) Traditional Tribal Council and NVE’s Department of the Environment and Natural Resources (DENR) is concerned that without proper harvest and escapement monitoring in place, changes in the population will not be detected until it’s too late, thus impacting the most accessible subsistence salmon resource for residents of Cordova and Tribal Members. Over the past 20 years concern over the amount of harvest occurring at Ibeck Creek has been steadily growing. Local and Tribal concern is now at an unprecedented high regarding the levels of harvest, catch and release, and escapement, as well as the current methods used for monitoring or lack thereof. The need for an accurate method of determining escapement and implementation of a detailed creel survey on Ibeck Creek is a priority for NVE and supported by US Forest Service (USFS) Cordova Ranger District, Alaska Department of Fish and Game (ADF&G) Commercial Division, and the Copper River Watershed Project (CRWP) as stated in the attached letters of support, partnerships established, and generous in-kind contributions.

Objectives:

Creel Survey

1. Estimate the Catch per Unit Effort and Harvest of Coho Salmon on Ibeck Creek
2. Estimate the Amount of Catch and Release for Coho Salmon on Ibeck Creek
3. Obtain Angler Use Statistics and Demographics on Ibeck Creek

Ibeck Creek Coho Salmon Escapement Assessment

4. Estimate Weekly and Annual Escapement of Ibeck Creek Coho Salmon such that the estimate is within 10% of the true value 95% of the time
5. Determine Run Timing at the Weir Site for Ibeck Creek Coho Salmon
6. Estimate Age and Length composition of Ibeck Creek Coho Salmon

Camp Coho

7. Develop a Curriculum for Educational Science and Subsistence Day Trips to “Camp Coho” Research Weir site for Tribal Youth and Local Cordova Students.

Methods: Coho salmon Escapement –The resistance board weir will be employed to census the returning adult Coho Salmon population of Ibeck Creek during the second through fourth year of the study (2017, 2018, and 2019). Ibeck Creek weir operation will begin on August 1st each season. The sampling end date will be determined in-season, when daily coho salmon passage drops to less than 1% of the annual seasonal passage to date, and remains at or below this level for three consecutive days, any time after October 1st. Coho Salmon will be sampled for age, sex, and length at the weir.

Angler statistics will be obtained through the use of a creel survey during all four years of the study. The current method proposed method is a three-stage sampling unit design from Bartlett 1994. is as follows. A three-stage sampling unit design from Bartlett 1994. Stage one’s unit is days; stage two’s unit is sampling periods within days; and stage three’s unit is anglers within sampling periods. For each sampling day two sample periods will be selected at random. Specific questions will be developed through both interagency (USFS, ADF&G, CRWP) and NVE tribal meetings to ensure the proper data is collected while respecting local tradition, language, protection of privacy, dignity, and confidentiality of all persons interviewed.

NVE will work with Copper River Watershed Project (CRWP) to develop a curriculum for educational day camp visits by local school children and Tribal youth to visit the weir and learn about salmon lifecycle, fisheries research, stream habitat, and subsistence fishing. CRWP has experience working with children and citizen scientists. Each year CRWP brings Cordova students to local and remote streams to conduct juvenile salmon sampling for inclusion in the anadromous waters catalog.

Partnerships/Capacity Building: Over the past fifteen years NVE has pioneered a successful capacity building model utilizing consultations and partnerships between Alaska Native Organizations and State and Federal agencies to conduct high quality research. This project gives NVE another opportunity for meaningful inclusion in the research and long-term management of the local salmon resource. NVE will

oversee all aspects of the project, thereby acquiring the array of skills needed to carry out major fisheries assessment projects. NVE fishery technicians will acquire the necessary skills and experience for fisheries research jobs. This project will allow NVE to further develop the skills of its members via local training, hiring for key positions in current and future fisheries assessment projects, as well as recruiting and encouraging young people to get an education in fisheries and natural resource management.

This project establishes a partnership between NVE and local Cordova USFS. NVE will provide the USFS and the ADF&G with weekly and annual escapement estimates and harvest information from the creel survey. The USFS has will assist NVE in site selection, access, creel surveying, weir installation, video monitoring, and help establish access from the Copper River Highway to the research site via a new designated use ATV trail. NVE worked with the ADF&G and the USFS on the development of this proposal and will continue to consult with them throughout the duration of the project. Copper River Watershed Project (CRWP) and NVE have also developed a partnership for this project to incorporate an educational component for the weir project, tentatively called “Camp Coho”. Camp Coho will use the research site as a science day camp to teach local students about a myriad of fisheries science topics.

Project Number: 16-505
Title: Stock Assessment of Late Run Kasilof River Chinook Salmon
Geographic Region: Southcentral Region–Cook Inlet–Kenai Peninsula–Kenai River
Information Type: Stock Status and Trends
Principal Investigator(s): Kenneth S. Gates, U.S. Fish and Wildlife Service, Kenai Fish and Wildlife Field Office
Co-Investigator: Tony Eskelin, Alaska Department of Fish and Game, Sport Fish Division

Project Cost:	2016: \$297,513	2017: \$263,645	2018: \$265,888	2019: \$0
Total Cost: \$827,046				

Issue Addressed: This project specifically addresses priority Chinook Salmon *Oncorhynchus tshawytscha* issues and information needs identified by the Southcentral Regional Advisory Council for southcentral Alaska’s Kasilof River. The Federal Subsistence Board recently approved an experimental community gillnet fishery in the Kasilof River to target Sockeye Salmon *O. nerka*. During the process of approving the new fishery, regulatory sideboards were established to avoid harvest of Chinook Salmon and Steelhead (anadromous Rainbow Trout *O. mykiss*), mainly through time- and area-closures. These time- and area-closures were recommended based on previous research describing spawning distribution and abundance of late-run Chinook Salmon (Faurot and Jones 1990; Reimer and Fleischman 2012) and Steelhead (Gates and Boersma 2010). Results presented by Faurot and Jones (1990) are based on a small sample size ($n = 39$ tagged fish) and are potentially biased because of the capture method (bank-oriented fishwheel) and a tagging location upriver of some identified spawning aggregations. The Reimer and Fleishman (2012) study was conducted between 2005 and 2008 when abundance of late-run Chinook Salmon was likely higher than current levels, and it is unknown how their results might compare to the current abundance levels. Therefore, updated information concerning abundance, run timing, spawning site fidelity and timing, and age, sex, and length composition of late-run Chinook Salmon in the Kasilof River is needed to develop an operational plan to successfully manage the newly-established experimental community gillnet fishery.

Objective(s):

1. Estimate the inriver abundance of wild, age-.2+ Chinook salmon in the Kasilof River from 20 June through 31 August, excluding those bound for Crooked Creek, such that both ends of the 90% Bayesian credibility interval are within 37% of the posterior mode.
2. Estimate the proportion, by age and sex, of Kasilof River late-run chinook salmon run such that all age-proportion estimates, during each sampling stratum, are within 8 percentage points of the true values 95% of the time.
3. Report number of radio tagged Chinook salmon present in Kenai National Wildlife Refuge waters by day of year.

Methods: The inriver abundance of wild, age-.2+ Chinook Salmon will be estimated using a two-event mark-recapture experiment. The marking event will consist of an inriver netting program conducted within the inter-tidal area of the Kasilof River. Spaghetti tags will be used as the mark, and caudal punches will serve as the secondary mark. A portion of the spaghetti-tagged fish will also receive

stomach-implant radio tags to index the effect of handling and tagging on fish migration and spawning success. The recapture event will consist of an inriver netting program conducted periodically within known late-run Kasilof River Chinook Salmon spawning/holding areas.

During both events all wild, age-.2+ Chinook Salmon that are captured will be sampled for ASL information. All fish deemed healthy will receive a spaghetti tag. One hundred and thirty of the spaghetti-tagged Chinook Salmon will also receive a radio transmitter. The presence/absence of an adipose fin will be recorded for all age-.2+ Chinook Salmon captured. Captured fish will be marked so that previously sampled fish can be identified. Radio-tagged Chinook Salmon will be located passively, by a network of stationary radio receiving stations, and actively, by manually tracking from a jet-powered outboard skiff.

The study design and analysis of data will mirror a project conducted between 2005 and 2008 by the Alaska Department of Fish and Game. An advantage of this approach is that estimates obtained during this study will be directly comparable to similar information collected between 2005 and 2008.

Partnerships and Capacity Building: This study is a collaborative effort between the U. S. Fish and Wildlife Service and Alaska Department of Fish and Game to collect information necessary for management of late-run Chinook Salmon in the Kasilof River. The project has been discussed in great detail with the Kenai National Wildlife Refuge, and will build on previous information collected by the Alaska Department of Fish and Game. Planning and reporting of this project will be discussed with the Southcentral Regional Advisory Council and presented at annual Council meetings.

Project Number: 16-551
Title: Subsistence Users’ Attitudes and Perceptions in the Russian River Dip Net Fishery
Geographic Region: Southcentral Alaska
Data Type: Ethnographic: Harvest monitoring and traditional ecological knowledge
Principal Investigator: Davin Holen, Division of Subsistence, Alaska Department of Fish and Game

Project Cost:	2016: \$41,316	2017: \$37,796	2018: \$20,329	2019: \$0
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Total Cost: \$99,441

Issue: The 2016 Fisheries Resource Monitoring Program has identified an information need for a “Change in subsistence-user attitude concerning the harvest of salmon since the establishment of the Russian River dipnet fishery, including: dependence on the fish as a food source; the significance of sharing, barter and customary trade; harvest methods (including methods of access); and, processing/preservation methods,.” within the priority information needs for Southcentral Alaska. This project has identified 3 communities whose members are federally qualified to participate in this fishery: Cooper Landing, Hope, and Ninilchik. The goal of this project is to provide information on the attitudes and perceptions of this fishery that began in 2007, and to describe the annual fish harvest patterns that include this subsistence opportunity.

Changes in demographics, transportation technology, socio-cultural, economic, and environmental factors have shaped salmon and nonsalmon fish species harvest efforts over time on the Kenai Peninsula. This project will seek to understand these factors while investigating communities’ current and lifetime subsistence salmon and nonsalmon fish harvest locations. The focus of this research is to document the contemporary subsistence fishery since it was established, methods of access to harvest locations, seasonality of fish harvest, processing of the harvest, and interactions with other anglers. Understanding how the current fishery operates and the attitudes and perceptions of the fishery by residents will aid in the management of the fishery. This research will be guided by three research questions based on the evaluation of existing data related to harvest and use patterns of salmon and nonsalmon fish species on the Kenai Peninsula, and relevant existing literature on local knowledge. The three research questions are:

1. Has the Russian River dip net fishery provided for greater opportunity for residents to meet their subsistence needs, and is there a need for additional opportunity in the subsistence fishery?
2. Is the Russian River dip net fishery a major component of resident harvesting patterns for salmon and other wild resources, and why do residents choose, or not choose to participate in the fishery?
3. How do residents access the fishery, process salmon, interact with other anglers, and what are resident attitudes and perceptions of customary trade of salmon and other wild resources?

Objectives:

The following objectives will be described in detail below in the methods section. The objectives are aligned to the three research questions provided in the introduction. Briefly, the project objectives are:

1. To determine if the Russian River dip net fishery has provided an adequate opportunity to harvest salmon for subsistence and if additional opportunity is necessary and if so by what means.

Additionally document resident attitudes and perceptions of customary trade of salmon and other wild resources.

2. Document how the subsistence fishery at the Russian River correlates with other sport, personal use, or subsistence practices residents participate in to meet their harvesting goals for salmon and nonsalmon fish.
3. Document how residents access the fishery, participate in the fishery (especially alongside other users), process salmon, and interact with other anglers participating in other fisheries.

Methods: To meet the objectives stated above, this research will employ three integrated social science data gathering methods. These methods are: 1) group interviews in the form of a community meeting, 2) key respondent interviews, and 3) participant observation. Objective 1 provides a broad context of the federal fishery and opportunities available for harvesting salmon and nonsalmon fish. Objective 2 highlights the Russian River fishery specifically and documents participation in the fishery and attitudes and perceptions about the fishery and other harvesting opportunities. Objective 3 documents the fishery and how residents have established a pattern of participation in this still relatively new harvesting opportunity at the Russian River Falls.

Objective 1 addresses the first research question. To meet this objective researchers will review the harvest pattern over time in the fishery and then identify participants who would be willing to participate in group interviews. As mentioned above the interview conducted in each of the three communities, Cooper Landing, Hope, and Ninilchik will focus on the entirety of the federal fishery in the Kenai and Kasilof watersheds and then narrow in focus to the Russian River. It is important to understand the broader context of the federal fishery for resident opportunity. At this time additional questions can be asked about resident attitudes and perceptions of a possible additional opportunity, the use of gill nets in the Kenai River.

Objective 2 correlates with the second research question. This objective will be met partly through questions derived from the group interview but mainly through key respondent interviews. The key respondent interviews will focus specifically on the Russian River dip net fishery. Residents will be asked to describe their harvesting pattern prior to and after the establishment of the fishery. Questions will relate to how their harvesting patterns have changed and if the fishery is meeting an additional need that was not being met prior to the fishery. Like Objective 1 residents will be sought that live nearby in Cooper Landing who do not participate in the fishery. This will provide a balanced perception of the fishery from multiple user groups. A total of 10-15 interviews will be the goal.

Objective 3 correlates to the first part of the third research question. This objective will be met through participant observation. It is expected that over the winter while conducting both the group interviews and the key respondent interviews the researchers will identify residents who are willing to have researchers accompany them to the Russian River fishery. Researchers are not federally qualified users, and therefore not able to participate in the fishery so they will accompany fishers and observe how residents access the fishery, how and where they process the salmon, and if there are other anglers on the river at the time, and if so what is the interaction.

Partnerships/Capacity Building: ADF&G will consult and coordinate research with the Chugach National Forest. This will include conducting field investigations in this project, including consulting with community organizations, setting up group and individual interviews, and distributing follow-up materials in the study communities.

Project Number: 16-552
Title: Chitna Check Station (Copper River in Season Data on Chinook and Sockeye Salmon Harvest)
Geographic Region: Southcentral.
Information Type: Harvest monitoring and traditional ecological knowledge
Principal Investigator: Copper River-Ahtna Inter-Tribal Resource Conservation District (CRITR)

Project Cost:	2016: \$50,000	2017: \$50,000	2018: \$50,000	2019: \$50,000
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Total Cost: \$200,000

Issue Addressed: This project will address the need for in season Chinook and Sockeye harvest and participation data in the Chitina Subdistrict of the Copper River due to recent increase in bag limits in this fishery. This will address the potential increase in harvest per user and participation and its potential to affect subsistence harvest in the Glennallen Subdistrict and conservation concerns.

This project has a goal to set up a voluntary reporting station and other reporting systems using all technology available to collect in-season harvest data in the Chitina area fisheries. This information will provide harvest and participation information in season in order to provide better decisions on in season management as well as set regulations for better long term sustainability of the subsistence chinook and sockeye fisheries on the Copper River.

It is important to have the check station at Chitina because of the direct competition of the personal use fishery in the Chitina area to subsistence fisheries upstream. These fisheries are experiencing long term trends of increasing participation and harvest with very little data during the season to assist managers and the public with managing this fishery. Shortages incurred by subsistence users will not be able to be addressed in time without some form of in season harvest and participation data in the Chitina Subdistrict.

Objectives: Objective 1: Establish a public voluntary fish harvest check station in Chitina that receives full support from the fishing public including both local and non-local users.

Objective 2 Develop data collection, analysis, and reporting process

Objective 3 Collect in season harvest data in the Chitina Area in-river fisheries

Objective 4 Reporting

Methods: This project has a goal to set up a voluntary reporting station and other reporting systems using all technology available to collect in-season harvest data in the Chitina area fisheries. This information will provide harvest and participation information in season in order to provide better decisions on in season management as well as set regulations for better long term sustainability of the subsistence chinook and sockeye fisheries on the Copper River.

Partnerships/Capacity Building: This project will work with all eight Ahtna Villages and the two ANCSA corporations in the Ahtna region. The Native Village of Eyak, and the Copper River- Prince

William Sound Marketing Association, Alaska Department of Fish and Game and other Copper River user groups.

This project has the potential to bring groups together that have historically been in conflict. This can make it possible to make more open communications on issues that have created difficulty in the past and help resolve them in a positive way.

APPENDIX B

Table B.1. Fisheries Resource Monitoring Program projects funded in the Southcentral Region from 2000 to 2014.

Project Number	Project Title	Investigators
Copper River Salmon		
00-013	Tanada Creek Salmon Escapement	NPS
00-034	Miles Lake Sonar Improvement	USFS, ADF&G
00-040	Copper River Salmon Subsistence Fishery Evaluation	ADF&G, CRNA
01-020	Copper River Chinook Salmon Feasibility of Abundance Estimate	NVE, LGL
01-021	Lower Copper River In-season Abundance Estimate	NVE, LGL, ADF&G
01-217	Copper River Groups Capacity Building Workshop	CRNA, LGL
02-015	Copper River Chinook Salmon Radio Telemetry	ADF&G, NVE
03-010	Upper Copper River C&T Subsistence Fish Harvests GIS Atlas	CRNA, LGL
04-501	Long Lake Sockeye Salmon Escapement	NPS, CRWP
04-502	Tanada Creek Salmon Escapement	NPS
04-503	Copper River Chinook Salmon Abundance Estimate	NVE, LGL
04-506	Lower Copper River In-season Abundance Estimate	NVE, LGL, ADF&G
04-507	Copper River Chinook Salmon Genetics	ADF&G, NVE, NPS
04-553	Copper River Salmon Runs Traditional Knowledge of Long Term Changes	ADF&G, NVE
05-501	Copper River Sockeye Salmon Spawning Distribution	NVE, ADF&G
06-502	Copper River Sockeye Salmon Inriver Abundance	NVE, ADF&G
07-502	Tanada Creek Salmon Weir	NPS
07-503	Copper River Chinook and Sockeye Salmon Abundance	NVE
07-505	Long Lake Salmon Weir	NPS, PWSSC
08-501	Copper River Sockeye Salmon Abundance	NVE, LGL
10-502	Tanda Creek Salmon Assessment	NPS
10-503	Copper River Chinook Salmon Assessment	NVE, LGL
10-505	Long Lake Salmon Assessment	NPS
10-552	Copper River Subsistence Harvest Validation	HDR, ECO, ADF&G
12-500	Copper River Chinook Salmon RFID Feasibility	NVE, LGL
12-550	Upper Copper R. Changing Environments & Subsistence	ECO, ADF&G
14-501 ^a	Long Lake Salmon	NPS
14-503 ^a	Tanada Creek Salmon	NPS
14-505 ^a	Copper River Chinook Salmon Fish Wheels	NVE

Continued on next page

Table B.1. Continued

Project Number	Project Title	Investigators
Copper River Steelhead		
01-148	Copper River Steelhead Stock Status	ADF&G, CRNA,USFWS
01-035	Copper River Steelhead Harvest Monitoring	NPS, CRNA
03-001	Cooper River Steelhead Population Biology	ADF&G
05-502	Copper River Steelhead Abundance	ADF&G, NVE
Copper River Freshwater Species		
01-110	Copper River Non-Salmon Species Harvest and Use	CRNA, ADF&G, CHVC, CNTC, Karie, MTC
02-077	Upper Copper River Increasing GIS Capabilities	CRNA
07-501	Tanada and Copper Lakes Burbot Abundance	NPS, ADF&G, MTC
Copper River Eulachon		
02-075	Eulachon Subsistence Harvest Opportunities	NVE, USFS, AD&FG
Prince William Sound Salmon		
00-035	Coghill Coho Salmon Weir	ADF&G, USFS
02-028	Chugach Region TEK Mapping	CRRC
03-033	Billy's Hole, PWS Salmon Stock Assessment	ADF&G, CRRC, USFS
Cook Inlet		
00-038	Cooper Creek Dolly Varden Assessment	ADF&G
00-041	Turnagain Arm Eulachon Subsistence Use & Assessment	USFS
03-045	Cook Inlet Subsistence Fisheries Harvest Assessment	ADF&G
07-506	Tustumena Lake Coho Salmon Spawning Assessment	USFWS
07-507	Kasilof Watershed Coho Salmon Radio Telemetry	USFWS
07-509	Kasilof Watershed Steelhead Trout Radio Telemetry	USFWS
08-502	Tustumena Lake Coho Salmon Assessment	USFWS
08-503	Kasilof River Steelhead Radio Telemetry	USFWS
08-504	Crooked and Nikoli Creeks Steelhead Weirs	USFWS

^a = On-going projects during 2016.

Abbreviations: **AD&FG** =Alaska Department of Fish and Game, **CNTC** = Cheesh'na Tribal Council, **CRNA** = Copper River Native Association, **CRRC** = Chugach Regional Resources Commission, **CRWP** = Copper River Watershed Project, **ECO** = Ecotrust, **USFS** = U.S. Forest Service, **Karie** = Dr. James Karie, **LGL** = LGL Ltd, **MTC** = Mentasta Tribal Council, **NPS** = National Park Service, **NVE** = Native Village of Eyak, **PWSSC** = Prince William Sound Science Center, and **USFWS** = U.S. Fish and Wildlife Service.

ANNUAL REPORTS

Background

ANILCA established the Annual Reports as the way to bring regional subsistence uses and needs to the Secretaries' attention. The Secretaries delegated this responsibility to the Board. Section 805(c) deference includes matters brought forward in the Annual Report.

The Annual Report provides the Councils an opportunity to address the directors of each of the four Department of Interior agencies and the Department of Agriculture Forest Service in their capacity as members of the Federal Subsistence Board. The Board is required to discuss and reply to each issue in every Annual Report and to take action when within the Board's authority. In many cases, if the issue is outside of the Board's authority, the Board will provide information to the Council on how to contact personnel at the correct agency. As agency directors, the Board members have authority to implement most of the actions which would effect the changes recommended by the Councils, even those not covered in Section 805(c). The Councils are strongly encouraged to take advantage of this opportunity.

Report Content

Both Title VIII Section 805 and 50 CFR §100.11 (Subpart B of the regulations) describe what may be contained in an Annual Report from the councils to the Board. This description includes issues that are not generally addressed by the normal regulatory process:

- an identification of current and anticipated subsistence uses of fish and wildlife populations within the region;
- an evaluation of current and anticipated subsistence needs for fish and wildlife populations from the public lands within the region;
- a recommended strategy for the management of fish and wildlife populations within the region to accommodate such subsistence uses and needs related to the public lands; and
- recommendations concerning policies, standards, guidelines, and regulations to implement the strategy.

Please avoid filler or fluff language that does not specifically raise an issue of concern or information to the Board.

Report Clarity

In order for the Board to adequately respond to each Council's annual report, it is important for the annual report itself to state issues clearly.

- If addressing an existing Board policy, Councils should please state whether there is something unclear about the policy, if there is uncertainty about the reason for the policy, or if the Council needs information on how the policy is applied.
- Council members should discuss in detail at Council meetings the issues for the annual report and assist the Council Coordinator in understanding and stating the issues clearly.

- Council Coordinators and OSM staff should assist the Council members during the meeting in ensuring that the issue is stated clearly.

Thus, if the Councils can be clear about their issues of concern and ensure that the Council Coordinator is relaying them sufficiently, then the Board and OSM staff will endeavor to provide as concise and responsive of a reply as is possible.

Report Format

While no particular format is necessary for the Annual Reports, the report must clearly state the following for each item the Council wants the Board to address:

1. Numbering of the issues,
2. A description of each issue,
3. Whether the Council seeks Board action on the matter and, if so, what action the Council recommends, and
4. As much evidence or explanation as necessary to support the Council's request or statements relating to the item of interest.



Federal Subsistence Board

1011 East Tudor Road, MS121
Anchorage, Alaska 99503



FISH and WILDLIFE SERVICE
BUREAU of LAND MANAGEMENT
NATIONAL PARK SERVICE
BUREAU of INDIAN AFFAIRS

FOREST SERVICE

FWS/OSM 15041.CJ

Ralph Lohse, Chair
Southcentral Alaska Subsistence
Regional Advisory Council
U.S. Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503

Dear Chairman Lohse:

This letter responds to the Southcentral Alaska Subsistence Regional Advisory Council's (Council) fiscal year 2014 Annual Report. The Secretaries of the Interior and Agriculture have delegated to the Federal Subsistence Board (Board) the responsibility to respond to these reports. The Board appreciates your effort in developing the Annual Report. Annual Reports allow the Board to become aware of the issues outside of the regulatory process that affect subsistence users in your region. We value this opportunity to review the issues concerning your region.

1. Food Security

The Council would like to continue raising the issue of food security for the Board. Recent studies highlight the importance of traditional food sources for Alaska's rural residents. One indicated that Yup'ik people in general consume about 20 times more of the complex fish oils every year than do people in the Lower 48 states, and that it may actually shield them from many health problems blamed on obesity, particularly, producing a lower prevalence of diabetes in the population. The Council encourages the Board to continue expanding its knowledge of guidelines, policies and materials related to food security, and to specifically refer to the importance of food security as part of its deliberations. For example, rather than just noting whether a regulatory proposal will benefit subsistence users, state whether it would enhance their food security.

Chairman Lohse

2

Response:

The Board appreciates the significance of food security for Alaska Native peoples and other rural residents of the state. Both the Southcentral Alaska and North Slope Subsistence Regional Advisory Councils have raised this concern in their 2014 annual reports to the Federal Subsistence Board.

Last year, the Council shared with the Board a website on food security sponsored by the Inuit Circumpolar Council. We have reviewed the summaries found on that site, which were derived from workshops held in the northern regions of Alaska. The Board has learned that food security includes both cultural and environmental systems. The Board has observed that in times of declines in subsistence resources and other conservation concerns, rural residents worry about their food security. This highlights a need for flexible regulatory and management options. The Board is open to further discussions with your Council and other regional advisory councils (Councils) regarding the extent to which food security concepts and issues could become part of the regulatory process. The Board is most interested in engaging the Councils about how to best integrate food security into how the Board and the Councils currently make regulations under Title VIII of the Alaska National Interest Lands Conservation Act.

The Board, working through its staff at the Office of Subsistence Management, has learned that the World Food Summit in 2006 defined food security to exist when “all people at all times have access to sufficient, safe, nutritious food to maintain a healthy and active life”. Food security in Alaska is linked to economic opportunity and the availability of affordable and healthy food alternatives inside communities and local markets, should they be available. Moreover, food security in rural Alaska is strongly linked to adequate access to subsistence resources and depends on a healthy network of exchange and sharing within rural communities. Food security in Alaska is being impacted by rapid changes in the environment.

The Board is beginning to understand that Alaska Native peoples and other rural residents are discussing food security concepts and issues to help define and articulate how they see current regulations and changing environmental conditions affecting their access to traditional natural foods. Understanding these issues is an important part of Board responsibilities. Food security as a means of enriching deliberations could help inform Board members of the paramount importance of subsistence resources as ideal and preferable sources of safe and nutritious food options in rural Alaska.

In addition to food security, the Board agrees with your Council that a subsistence way of life is closely linked to health and nutrition and many other important community and individual characteristics. During the review of the rural determination process, some Council members and others from the public recommended that the Board consider food security, health, and

Chairman Lohse

3

nutrition to be important criteria or characteristics for making rural determinations. We recommend that this Council continue to bring these important issues to the attention of the Board, especially as it considers how to improve the rural determination process in the future.

2. Native Preference and the Intent of ANILCA

Recently, at one of the Board meetings, a Board member noted that the Alaska Federation of Natives (AFN) supported the rural subsistence priority as it currently stands. That is not quite accurate. In 2012, at its annual convention, AFN adopted a resolution endorsing an Alaska constitutional amendment “to recognize Alaska Native plus rural subsistence rights” (AFN Resolution 12-07). Then, in 2013, AFN passed a resolution calling upon Congress to “enact legislation providing for a priority for indigenous hunting, fishing, trapping and gathering on all Alaskan lands and waters” (AFN Resolution 13-7). The Board is encouraged to review those resolutions, which are enclosed. Additionally, the Board is encouraged to review the legislative history of ANILCA and reference Representative Morris Udall’s speeches on the legislation. The Board review on these issues could allow them, when applicable, to consider the reference materials during deliberations.

Response:

The Board is aware of the position of the Alaska Federation of Natives (AFN) on the rural priority, but cannot find statement by any Board member on the record that AFN supported the rural priority as it currently stands.

The Board has reviewed the two AFN resolutions that the Council provided in its annual report. Resolution 12-07 called for action by the State Legislature to convene a constitutional convention to recognize Alaska Native Tribal rights. Were the State Legislature and its residents to so amend the Alaska Constitution as requested by the resolution, the Board would still be obligated under Article VIII of the Alaska National Interest Lands Conservation Act (ANILCA) to provide for “the continuation of the opportunity for subsistence uses by rural residents of Alaska, including both Natives and *non-Natives*” as stated in Section 801 (emphasis added). Thus, a Native preference could not apply to Federal public lands.

Resolution 13-7 called upon Congress to enact legislation providing for an indigenous hunting, fishing and trapping priority on all Alaska lands and waters. As you know, there are no treaties between Alaska’s many tribes and the United States to secure hunting and fishing rights, as is the case with Lower 48 tribes. Section 4(b) of the Alaska Native Claims Settlement Act explicitly abolished all aboriginal hunting and fishing rights. Additionally, as noted previously, Section 801 of ANILCA makes it clear that the subsistence priority on Federal public lands and waters applies to both Native and non-Native rural residents alike. Both provisions would have to be amended by Congress in order to provide for a Native priority. Until such time, the Board is

Chairman Lohse

4

required to continue providing for a subsistence priority to all rural residents on Federal public lands.

Regarding speeches by Representative Morris Udall, he was the prime sponsor of the legislation that became ANILCA and likely gave many speeches throughout the process of introducing and passing that legislation. However, the Board is obligated to reference the plain language of its governing statute (ANILCA) and implementing regulations when fulfilling its legal obligations.

3. Allocation of Fisheries Resource Monitoring Funds

The Fisheries Resource Monitoring Program is important to the Council. It has provided valuable data for the Council to use when developing its recommendations on Federal subsistence fishery proposals. When the original allocations were developed for each region, the Federal Subsistence Management Program did not have responsibility for the Cook Inlet waters and subsistence fisheries. We request a reallocation of funds to the Southcentral Region to include that significant additional area and associated costs. We have been told this is in process but we do not know when this may occur and we encourage that it happen soon. We support full funding, which includes funding for the Cook Inlet area, for the Southcentral region to continue the important work the FRMP has provided.

Response:

The Fisheries Resource Monitoring Program (FRMP) was established with the intent of creating a balanced program throughout the State in proportion to each region's informational needs for the Federal Subsistence Management Program. Budget guidelines were designed to equitably support subsistence fisheries management among regions that substantially differ in quantity and intensity of subsistence fisheries issues, as well as the amount of Federal public lands. The formula for allocation across regions was developed based on consideration of six criteria that included the following:

1. Level of risk to the viability of species and populations that support subsistence fisheries and conservation unit purposes.
2. Level of threat to conservation unit purposes.
3. Amount of subsistence harvest needs not being met (or where anticipated demand for resources will exceed supply in the near future).
4. Amount of information available to support subsistence management (higher priority given where a lack of information exists).
5. Importance of a species to a subsistence harvest (for example, number of villages affected, pounds of fish harvested, miles of river) and qualitative significance (for example, cultural value, unique seasonal role).
6. Level of community concerns over subsistence harvests (for example, allocation, fisheries upstream and downstream of each other, recreational use concerns, changes in size of fish).

Chairman Lohse

5

Budget guidelines by region have varied somewhat over time in response to changing issues and budget levels. It was the intent at the FRMP's inception that some reallocation may occur among regions as issues are addressed, new issues emerge, and funding levels change.

Therefore, regional budget guidelines represent an initial target for planning rather than rigid allocations. Ultimately, project selection should be based on addressing the highest priority projects for Federal subsistence fishery management, even if the resulting allocation of funding does not conform to regional budget guidelines. Initial guidelines for funding by region are:

Region	Percent of Totals	
	Dept of the Interior	Dept of Agriculture
Northern Alaska	17.0%	
Yukon River	29.0%	
Kuskokwim River	29.0%	
Southwest Alaska	15.0%	
Southcentral Alaska	5.0%	32.5%
Southeast Alaska	0.0%	62.5%
Multiregional	5.0%	5.0%
Totals	100.0%	100.0%

However, it is the intention of the Fisheries Division in OSM to review these allocation guidelines once the division is fully staffed and perhaps revise them.

4. North Pacific Fishery Management Council Subsistence Seat

The Magnuson-Stevens Act is up for reauthorization and is currently being debated in Congress. The Council has discussed the importance of voting membership on the North Pacific Fishery Management Council (NPFMC) to represent subsistence users. The Department of Commerce, through the NPFMC, has authority to manage the fisheries in the Bering Sea. The Bering Sea fishery produces by-catch of Alaska-bound salmon during the commercial Pollock fisheries, which affects all subsistence salmon fisheries in Alaska's waters. The last response to our most recent annual report said the Board is willing to write letters to the Secretaries to forward our concern on to the Secretary of Commerce, Alaska Congressional delegation, and Governor of Alaska. The Council would like to know if this occurred.

We would like the Board, in upholding the rural subsistence priority on ANILCA lands, to encourage the Secretaries to communicate with the Secretary of Commerce to establish a subsistence seat on the NPFMC. The seat will provide a voice and represent Federal subsistence users in Alaska. The Board can stress that the subsistence representative be a rural

Chairman Lohse

6

resident and also a qualified Federal subsistence user. We ask that the Board ask the Secretaries to begin a dialogue with the Secretary of Commerce and the Governor to consider a dedicated subsistence seat.

Response:

At the request of several Councils in their FY2013 annual reports, the Board sent a letter on December 9, 2014 to the Secretaries of the Interior and Agriculture, requesting that they submit a letter to the Secretary of Commerce and the Governor of Alaska, urging them to appoint a subsistence user to the NPFMC. Ultimately, the Undersecretary of Commerce for Oceans and Atmosphere responded, noting that Alaska Governor Bill Walker had submitted a nominee – Arthur Nelson – “who has strong connections to Alaska subsistence communities.” It is worth noting that Mr. Nelson was nominated to fill a vacant sport fishing seat on the NPFMC and is the executive director of the Bering Sea Fishermen’s Association. The letters between the Board and the various secretaries are enclosed with this reply.

One other problem related to the Council’s request is how membership seats are designated on the NPFMC. Membership on the NPFMC is determined by the U.S. Congress, not the Secretary of Commerce. The Secretary of Commerce merely appoints from a pool of nominees. It is not within the Board’s scope of authority to advocate for, or request changes to, laws passed by Congress.

The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act), which is the law governing membership on the NPFMC, is still undergoing a reauthorization process. On March 04, 2015, Alaska Congressman Don Young introduced House Bill H.R. 1335 to the Committee on Natural Resources “*To amend the Magnuson-Stevens Fishery Conservation and Management Act to provide flexibility for fishery managers and stability for fishermen, and for other purposes.*” For details see: <https://www.congress.gov/bill/114th-congress/house-bill/1335/text>. The bill, among other things, would require Alaska’s governor to consult subsistence stakeholders before nominating people to the council, and it provides that subsistence expertise can qualify a person as a nominee. But it does not add a subsistence seat to the North Pacific Council, as some of the Regional Advisory Councils and many Alaska tribes have requested.

An inquiry with Rep. Young’s staff revealed that there is possibility that the Magnuson-Stevens Act reauthorization may not be finalized until after the presidential election in November 2016.

5. Special Actions

The special action is a tool to address out-of-cycle requests and changes in Federal subsistence regulations and is used by in-season managers in consultation with the affected Council chairs

Chairman Lohse

7

and members. The Council requests these special actions be distributed in a timely manner. The immediate distribution is essential to keep the Chairs and affected Council members involved and informed of closures and extension of existing seasons.

Response:

The Board recognizes the importance of maintaining open lines of communications between OSM and Council members concerning Special Action Requests. Some special action requests come in with a very short turnaround time before the affected season begins. Sometimes there are only a few days or a week to develop the analysis and send it through all the required levels of review; however, the Special Action Requests are distributed to the appropriate Council Chairs after they are submitted to OSM. Keeping an open dialogue between all affected parties is the goal and OSM will endeavor to do so when time permits. It is worth noting that, once a special action is approved, a notice is posted on the Federal Subsistence Management Program's Facebook page (www.facebook.com/subsistencealaska). Additionally, anyone can sign up for email notifications of news releases, which are issued the day the special action is approved, by sending an email to fws-fsb-subsistence-request@lists.fws.gov.

6. Partners Program

The Partners Program should be expanded to be more of an interdisciplinary approach and fully engage young people. The program funds fishery biologists, anthropologists and student interns. Engaging our youth will provide an opportunity for them to establish an educational goal toward a science degree as well as to promote involvement in the Federal Subsistence Management Program.

Response:

The Board recognizes the importance of the Partners for Fisheries Monitoring Program (Partners Program) and its value in strengthening Alaska Native and rural involvement in Federal subsistence management. The Board is in agreement that the program should allow for an interdisciplinary approach to be inclusive of all subsistence resources. On May 14, 2015, OSM announced a Notice of Funding Opportunity for the Partners for Fisheries Monitoring program funding for 2016-2019. Office of Subsistence Management is seeking proposals to fund a biologist, social scientist, or educator position in Alaska Native and rural organizations. There is also funding available through the Partners Program for rural education programs and curriculum development. Efforts are being made to coordinate the Partners Program with the University of Alaska, Alaska Native Science and Engineering Program (ANSEP).

ANSEP provides an opportunity for university level students to pursue internships within their field of interest. In addition ANSEP has developed a middle school program to increase interest in younger students to follow an educational and career path in science, technology, engineering,

Chairman Lohse

8

and math. It is our hope that by developing a partnership between the Partners Program and ANSEP we will be able to increase opportunities for rural and Alaska Native youth to become engaged and interested in resource management.

7. Federal Subsistence Management Proposals

The Council addresses regulatory proposals on fish and wildlife and develops recommendations for the Board's consideration. In some cases, the Office of Subsistence Management preliminary conclusions may say support to "align" with current State hunting or fishing regulatory languages and/or the Board may also use the term in its deliberations.

The Council discourages the Board and staff from using the terms "aligning" or "align" when discussing proposed Federal regulations and their relationship with State of Alaska regulations. The use of the term implies that the Federal program is following the lead of the State of Alaska when the Federal program is, in our opinion, the lead. Rural users hear the wrong message with the use of those words.

Response:

The Board understands your concern and tries to avoid language that implies that the Federal Subsistence Management Program strives to incorporate, or align with, State regulations. In fact, the majority of Federal regulations have been adopted for the purpose of allowing rural residents more opportunity to hunt, fish, and trap than was allowed for in State regulations. Occasionally, the State Board of Fisheries or Game has adopted a regulation that allows rural residents more opportunity than existed in Federal regulations, and the Board has adopted a similar regulation. The Board's primary objectives and obligations are to ensure conservation of the population and, when the population can allow, provide for subsistence opportunity to rural residents. If there are times when the Federal regulations are parallel to those of the State's, then that is a secondary benefit to avoid regulatory complexity for the subsistence user, not the Board's motivation for adopting the regulation.

8. Subsistence Resources – Local Observations

Subsistence, sport and recreational users in the field have observed abnormal growths or deformities on fish and wildlife resources, as well as the presence of invasive plant species in their communities. These events are occurring with increased frequency due to various environmental factors.

We encourage the Board, with its interagency resources, to provide technical or scientific reports on the occurrence of these phenomena and their causes. These reported occurrences can be gathered from marine, terrestrial, and plant species observations and shared with other Federally-managed programs such as Migratory Birds and Marine Mammal Protection and with

Chairman Lohse

9

communities within the Southcentral region. It would be helpful to managers and local users to better understand why these phenomena are occurring and what management steps, if any, can be taken to counteract them.

Response:

The Board, working through staff at the Office of Subsistence Management (OSM), has become aware of a number of research projects and websites that gather observations on changes in the environment and natural resources. Documenting local observations are part of most Harvest Monitoring and Traditional Ecological Knowledge reports submitted through the Fisheries Resource Monitoring Program, and are often included in research and resource management reports by State and Federal agencies. Consolidating and synthesizing available data on local observations of environmental and resource change is not as common. This issue could be forwarded as a priority information need for the next research funding cycle, both as a Southcentral and as an inter-regional need. For those members of the Council who may not be aware, the Alaska Native Tribal Health Consortium runs the Local Environmental Observer (LEO) Network – an online resource where local people can post their observations of climate change, extreme weather, and resource health among other things (<http://www.anthc.org/chs/ces/climate/leo>). The Board recommends inviting the Tribal Health Consortium to give an overview of their program to the Council. OSM staff would be happy to work with your Council to arrange for this and other relevant research presentations to include on the agenda of future meetings.

9. All RAC Meeting

The Council greatly appreciates the briefing provided by the Office of Subsistence Management regarding the potential for an All-Council meeting in the winter meeting cycle of 2016. We support the development of this meeting and will provide some suggestions for agenda items. For those who attended the previous one, they recalled it was an excellent meeting and well worth the effort and expense.

Response:

The Board is pleased that the Council supports the all-Council meeting for the winter 2016 meeting cycle. A committee has been established that consists of all of the Council Chairs, Council Coordinators, and the Office of Subsistence Management Native Liaison. That committee has developed agenda items for the joint session as well as for break out training, panel and report sessions. Work is also underway to secure a suitable meeting facility in Anchorage for the planned meeting dates of March 7-11, 2016. The Council should receive an update on the planning at its fall 2015 meeting.

Chairman Lohse

10

In closing, I want to thank you and your Council for their continued involvement and diligence in matters regarding the Federal Subsistence Management Program. I speak for the entire Board in expressing our appreciation for your efforts and our confidence that the subsistence users of the Southcentral Region are well represented through your work.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tim Towarak".

Tim Towarak
Chair

Enclosure

cc: Southcentral Alaska Subsistence Regional Advisory Council
Federal Subsistence Board
Eugene R. Peltola, Jr., Assistant Regional Director, OSM
Chuck Ardizzone, Deputy Assistant Regional Director, OSM
Carl Johnson, Council Coordination Division Chief, OSM
Donald Mike, Subsistence Council Coordinator, OSM
Interagency Staff Committee
Administrative Record

**Cook Inlet Area Federal Subsistence Fisheries
2015 Summary (through September 9)**

Subsistence Permits – A total of 187 subsistence fishing permits were issued during 2015 (Table 1). Most were issued for the Kenai River. No permits were issued for the winter ice fishery on Tustumena Lake.

Table 1.–The number and type of federal subsistence fishing permits issued during 2015.

Subsistence Permit	Community			Total
	Cooper Landing	Hope	Ninilchik	
Kenai River	87	32	21	140
Kasilof River	N/A	N/A	33	33
Tustumena Lake Ice Fishery	N/A	N/A	0	0
Designated Fisher	7	2	5	14
All Permits	94	34	59	187

Subsistence Harvest – The reported subsistence harvest of Sockeye Salmon in dip net and rod and reel fisheries is 1,454 fish from the Kenai River and 65 fish from the Kasilof River through September 9 (Table 2). Harvest of other species reported to date includes two Chinook Salmon and three Lake Trout in the Kasilof River rod and reel fishery. Harvest for rod and reel and dip net fisheries will continue to be reported through January of 2016.

An operational plan for the Kasilof River experimental community gillnet fishery for Ninilchik residents was approved on July 13 and fishing commenced the same day. Harvest of 223 Sockeye Salmon was reported (Table 2). The fishery ended by regulation on July 31. Other species captured in the fishery included Pink Salmon, Dolly Varden, and Lake Trout.

An operational plan for the Kenai River community gillnet fishery was not approved in 2015. The Ninilchik Traditional Council did not submit an operational plan for the Kasilof River fish wheel fishery in 2015.

Table 2.–Federal Subsistence Harvest reported through September 9, 2015.

Subsistence Fishery	Cooper Landing Residents			Hope Residents			Ninilchik Residents			Totals
	Sockeye	Coho	Chinook	Sockeye	Coho	Chinook	Sockeye	Coho	Chinook	
Dip Net Fisheries										
Russian River Falls	1,010	N/A	N/A	364	N/A	N/A	26	N/A	N/A	1,400
Kenai River below Mile 48	0	0	0	0	0	0	0	0	0	0
Moose Range Meadows	0	0	0	0	0	0	0	0	0	0
Kasilof River	N/A	N/A	N/A	N/A	N/A	N/A	65	0	0	65
Experimental Gillnet Fishery										
Kasilof River	N/A	N/A	N/A	N/A	N/A	N/A	223	0	0	223
Rod and Reel Fisheries										
Upper Kenai/Russian River	20	0	N/A	0	0	N/A	0	0	N/A	20
Moose Range Meadows	0	0	0	0	0	0	34	0	0	34
Kasilof River	N/A	N/A	N/A	N/A	N/A	N/A	0	0	2	2
Totals	1,030	0	0	364	0	0	348	0	2	1,744

Management Summary – Emergency Special Action 10-KS-01-15 was issued to close the Federal subsistence fishery for Chinook Salmon in the Kenai River downstream from the outlet of Skilak Lake from Thursday, June 18, through Saturday, August 15, 2015. This closure prohibited all subsistence fishing for Chinook Salmon, including dip net, rod and reel, and community gillnet fisheries. The Special Action followed an Emergency Order issued by the Alaska Department of Fish and Game on May 1 to close the sport fishery for early-run Chinook salmon throughout the river and to close the Kenai River above Slikok Creek to sport fishing through 31 July. Federal waters of the Kenai River below Skilak Lake were closed to fishing for Chinook Salmon for all users through August 15.



National Park Service
U.S. Department of the Interior

Wrangell-St. Elias
National Park/Preserve

P.O. Box 439
Mile 106.8 Richardson Hwy
Copper Center, AK 99573

907-822-5234 phone
907-822-3182 fax

Wrangell-St. Elias National Park/Preserve News Release

For Immediate Release – July 16, 2015
Mark Keogh – (907) 822-7223

Plans Announced for 2015 Federal Subsistence Hunt of Chisana Caribou Herd

Copper Center, AK – Plans for the 2015 federal subsistence hunt for the Chisana caribou herd have been announced by Wrangell-St. Elias Superintendent Rick Obernesser, the designated federal manager for the hunt. The Federal Subsistence Board authorized a limited harvest from the Chisana caribou herd at its January 2012 meeting. Consistent with the cooperative management plan for the herd, the harvest quota will be 7 bull caribou, and a maximum of 18 federal registration permits will be issued to federally qualified subsistence users. The hunt will open on August 10 and close on September 30 or when the quota has been reached. Hunters are asked to report back within three days of harvesting an animal or at the end of the season if unsuccessful. The hunt area is Federal public lands in Unit 12 that lie east of the Nabesna River and Glacier and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border.

Eligibility for the hunt is limited to permanent residents of Chisana, Chistochina, Mentasta Lake, Northway, Tetlin, Tok, Unit 12 along the Nabesna Road (mileposts 25-46), and that portion of Unit 12 east of the Nabesna River and the Nabesna Glacier and south of the Winter Trail. For residents of Chistochina, Mentasta Lake, Northway, and Tetlin, permits will be distributed through the tribal council offices in those communities. Contact the council offices for additional information. Residents of Chisana, Tok, and other eligible areas should contact Barbara Cellarius, Subsistence Coordinator, at 822-7236 or barbara_cellarius@nps.gov for permit information.

The Chisana caribou herd is a small international herd occurring in Yukon and Alaska on the Klutlan Plateau and near the headwaters of the White River. In the United States, its range is primarily within the boundaries of Wrangell-St. Elias National Park and Preserve. From the late 1980s through 2003, the herd experienced a decline in population and almost all hunting was stopped in 1994. From 2003 to 2006, a recovery effort designed to increase recruitment and calf survival was conducted. The herd population currently appears stable at approximately 700 animals. The herd management plan provides recommendations and strategies to guide its management and conservation. The conditions for this hunt are consistent with the plan.

For more information, contact Barbara Cellarius, Subsistence Coordinator, at (907) 822-7236 or barbara_cellarius@nps.gov.

--NPS--

EXPERIENCE YOUR AMERICA

The National Park Service cares for special places saved by the American people so that all may experience our heritage.

Backcountry and Wilderness Stewardship Plan

Wrangell-St. Elias National Park & Preserve

National Park Service
U.S. Department of the Interior



Public involvement information • Summer 2015



Purpose of the plan

This Backcountry and Wilderness Stewardship Plan is being developed to guide the preservation, management, and use of the largest designated wilderness in the National Wilderness Preservation System into the future. The purpose of this plan is to preserve the area's backcountry and wilderness character while allowing for exceptions provided under the Alaska National Interest Lands Conservation Act of 1980 (ANILCA).

Need for the plan

Since the park and preserve were established in 1980 and the original General Management Plan completed in 1986, much has changed. The General Management Plan is now outdated and does not adequately address the protection and stewardship of backcountry and wilderness. There is a need to develop the plan to accomplish the following:

- Identify actions that will enable us to continue to provide an outstanding visitor experience in the face of increasing backcountry and wilderness use in some areas.
- Provide consistent guidance for dealing with difficult backcountry and wilderness issues such as cabin and airstrip management and appropriate levels of commercial use.

Scope of the plan

This plan will identify desired future conditions for the backcountry and wilderness, provide management actions that work towards desired conditions, identify management tools to address recreational and commercial uses, and provide for customary and traditional subsistence activities. This plan is not a wilderness eligibility assessment and will not evaluate additional lands to be recommended or designated as wilderness.

9.4 million acres of Wrangell-St. Elias National Park & Preserve is managed as "wilderness" under the Wilderness Act of 1964 and as provided under ANILCA. As a congressionally designated wilderness area, the Wrangell-St. Elias Wilderness is managed to preserve its wilderness character and maintains some restrictions over what uses can, and cannot, occur there. Uses provided for under ANILCA include provisions relating to subsistence use, cabins and other structures, certain means of motorized access, among others. More information on the Wilderness Act and ANILCA can be found at: <http://nps.gov/wrst/>

Anticipated management challenges

The management framework of Wrangell-St. Elias is complex. As a result, this plan will address a number of issues with the goal of providing long-term guidance to preserve backcountry and wilderness resources and character while providing for uses allowed under ANILCA. A few of the management challenges that have already been identified and will be addressed within this plan are:

- Visitor use and impacts
- Motorized use (including snowmachines and off-road vehicles)
- Cabin management
- Airstrip management and maintenance
- Commercial use and services
- Cumulative effects of use

One of the purposes of public scoping is to identify additional issues and challenges the park can address in this plan. We invite you to share your thoughts about these issues or other topics that you feel should be considered as part of this planning effort.

Share your thoughts

Public scoping for the Backcountry and Wilderness Stewardship Plan will extend through November 2015. This is an ideal time for you to share your thoughts, concerns, and vision for the future of Wrangell-St. Elias National Park & Preserve's wilderness and backcountry areas. Your input will help guide the planning team in developing the Backcountry and Wilderness Stewardship Plan, including the consideration of various alternatives for managing the park's backcountry and wilderness into the future. Additional opportunities for public input will be announced as the planning process progresses. We look forward to hearing from you.

Questions to consider

1. When you visit the Wrangell-St. Elias backcountry and wilderness, what activities and experiences are most important to you?
2. What factors have influenced your backcountry and wilderness experience here?
3. What issues in the Wrangell-St. Elias backcountry and wilderness are concerning to you, and what do you see as possible avenues to resolve them?
4. What do you value about this backcountry and wilderness?
5. Imagine you are visiting the Wrangell-St. Elias National Park & Preserve backcountry and wilderness area 20 years from now. What conditions, experiences, visitor services, and facilities would you like to see?

How to comment

Comment online at:
<http://parkplanning.nps.gov/projectHome.cfm?projectID=44299>

Mail comments to:
Wrangell-St. Elias National Park & Preserve
ATTN: Bruce Rogers
P.O. Box 439
Copper Center, AK 99573

Call us at: (907) 822-7213 or (907) 822-7240

Office of Subsistence Management

Fall 2015 Regional Advisory Council Report

Staffing Update

Robbin La Vine joined the Office of Subsistence Management (OSM) in October 2014. She is an anthropologist with extensive experience conducting subsistence research and building collaborative partnerships with Alaska Tribal, State, and Federal entities since 2002. Before joining OSM, she worked as a researcher for the Togiak National Wildlife Refuge, served as Social Scientist for the Bristol Bay Native Association Partners Program in Dillingham, and was a Subsistence Resource Specialist for the Alaska Department of Fish and Game, Division of Subsistence. Robbin is delighted to serve rural Alaskans while strengthening partnerships to ensure the continuation of the subsistence way of life.

Amee Howard joined OSM as the new Subsistence Policy Coordinator in July 2015. Prior to OSM, she worked as an Environmental Protection Specialist for the Pacific West Region of the National Park Service in Boulder City, Nevada. Previously, she worked for the Alaska Department of Fish and Game, Division of Commercial Fisheries, as a Fish and Game Program Technician in Sitka. Amee also spent time working as the Coastal Monitoring Coordinator for the Sitka Tribe of Alaska. She earned her Bachelors of Science in Natural Sciences, with minors in Environmental Studies and Geology, from the University of Alaska, Anchorage. Amee possesses a well-rounded background gained from previous work experience and is a valuable addition to the OSM team.

Efforts are currently underway to hire the following positions: Council Coordinator, Anthropologist, Anthropologist (Pathways), Fisheries Biometrician, Fisheries Biologist (2), Fisheries (Pathways) Grants Management Specialist, IT Specialist, and Administrative Assistant.

The North Pacific Fishery Management Council adopts measures to reduce Chinook Salmon bycatch in the Bering Sea Pollock fishery

At its April 2015 meeting in Anchorage, the North Pacific Fishery Management Council (NPFMC) took action to reduce bycatch of both Chinook and Chum Salmon in the Bering Sea commercial Pollock fishery. Recognizing the precarious state of Western Alaska's Chinook Salmon stocks, the NPFMC took a combination of actions which lower the caps in times of low abundance, combine Chinook and Chum Salmon bycatch management, place additional requirements on industry incentive plans and reapportion the Pollock catch between seasons. Taken together, these actions are anticipated to reduce bycatch of both Chinook and Chum Salmon, and ensure that additional measures, including lower caps, are in place in years of low Chinook Salmon abundance.

Much of the attention from stakeholders from both Western Alaska and the Pollock fishery focused on the option of lowering the Chinook Salmon bycatch hard cap and the performance standard, currently 60,000 and 47,591 fish, respectively. Western Alaskan stakeholders asked for a 60% reduction in both the hard cap and performance standard during testimony at the meeting and in several hundred letters and resolutions submitted prior to the meeting. The

Pollock industry advocated that no reductions be enacted. The State of Alaska led the effort to provide protections for Western Alaska Salmon stocks. Newly-appointed Alaska Department of Fish and Game Commissioner Sam Cotten introduced a motion calling for a 35% reduction in the performance standard and a 33% reduction in the hard cap. Commissioner Cotten's motion was amended by the Bill Tweit, NPFMC representative from Washington State, to a 25% reduction in the hard cap and a 30% reduction in the performance standard. This lesser reduction was passed by the NPFMC unanimously (10-0).

The results of the NPFMC action are as follows: In years of low Chinook Salmon abundance (defined as years in which the cumulative total Chinook Salmon runs of the Kuskokwim, Upper Yukon and Unalakleet Rivers is at or below 250,000 fish), the hard cap will be 45,000 and the performance standard will be 33,318 Chinook Salmon. The Pollock fishery manages to the performance standard, so the reduction in this number is important. The Council also made it very clear that they expect bycatch to remain well below the caps, and would take additional action if warranted. It should be noted that, in recent years, bycatch has averaged around 15,000 Chinook Salmon.

In addition to the reductions in the cap levels, the NPFMC's action contains several other, important measures. The other pieces of the motion apply in all years – not just when Salmon abundance is low. Alternative 2 combines Chinook and Chum Salmon bycatch management programs, ensuring a coordinated approach. It also requires information sharing with Western Alaska groups. Alternative 3 adds five new requirements for the industry Incentive Plan Agreements (IPA) to meet, including requiring Salmon excluders, restrictions on bycatch rates in October (a time of historically high bycatch) and significant penalties (no fishing) for boats with repeatedly bad bycatch performance. The options the Council selected under Alternative 4 provide the Pollock fishery with the flexibility to catch more of its harvest in the late A season, potentially shifting harvest effort away from the high bycatch times later in the year.

In summary, the NPFMC's action puts in place measures to further reduce bycatch in all times of abundance, and to ensure that in periods of low Chinook Salmon abundance the Pollock fishery would be limited to a lower level of bycatch.

Bridging the Gap between Native Communities, Conservation, and Natural Resource Management: Grant Update

The U.S. Fish and Wildlife Service and the Alaska Native Science and Engineering Program (ANSEP) were awarded a National Fish and Wildlife Foundation grant to help re-establish a lost connection between Federal resource managers and rural communities in the Yukon-Kuskokwim and Doyon Regions. Members of these communities rely on subsistence resources within six National Wildlife Refuges for both cultural and nutritional needs. Continued resource declines in both the Yukon and Kuskokwim River drainages have led to immense hardships for local residents as well as numerous challenges for resource managers to provide sufficient subsistence harvest opportunities, while ensuring adequate conservation efforts.

Funds from this grant are used to increase outreach opportunities and foster collaborative solutions by expanding the Refuge Information Technician (RIT) Program. Outreach and education contribute significantly to the overall success of resource management. Language barriers and cultural obstacles often stand in the way of achieving effective communication. The RIT program employs Alaska Native residents to serve as liaisons between the Yukon Delta National Wildlife Refuge and local communities. The RITs' regional experience, traditional ecological knowledge, Yup'ik language skills, and cultural sensitivity enhance their role as intermediaries. Expanding the capabilities of the RIT program will significantly increase and improve important connections between the Yukon Delta National Wildlife Refuge and local communities. These relationships are fundamental for local residents to become more involved in the management and conservation of the resources on which they depend.

Funds from this grant are also supporting ANSEP students participating in biological internships within the Yukon-Kuskokwim and Doyon Regions. ANSEP strives to increase the number of Alaska Natives employed in the fields of science, technology, engineering and mathematics (STEM) by increasing the number of individuals on a career path to leadership in STEM fields. The U.S. Fish and Wildlife Service is partnering with ANSEP to provide meaningful summer internships that expose students to careers in resources management. These internships provide an opportunity for students to experience resource monitoring and management while developing knowledge and skills allowing them to succeed in professional resource management positions.

Changes to Appointment Process

The Office of Subsistence Management has submitted requests to the Secretary of the Interior to make the following changes to the appointment process: shift from 3-year to 4-year appointment terms, allow for appointment of alternates, and provide for a 120-day carryover term for incumbents in the event that appointment letters are not timely issued. Dan Ashe, Director, U.S. Fish and Wildlife Service, has provided his support of these changes. As of the writing of this report, OSM is waiting to hear back from the Secretary's office to initiate the direct final rule making that would be necessary to change the appointment terms to 4 years. The new Senior Advisor for Alaska Affairs, Michael Johnson, will be assisting in moving this through the Secretary's office. OSM is moving ahead with plans to implement all changes for the current appointment cycle.

In order to switch from 3-year to 4-year appointment terms, as well as switch from having one-third of Council seats up for appointment each year to one-fourth of the seats being up for appointment, appointment terms will be staggered in order to complete the transition by the 2019 appointment cycle. This means that some Council members, even incumbents, may receive 2, 3 or 4-year appointments in the next few years. By 2019, however, all Council appointments will be for 4-year terms. If you have any questions, contact Carl Johnson, Council Coordination Division Chief, at (907) 786-3676 or carl_johnson@fws.gov.

All-Council Meeting
Anchorage, Alaska – Location TBD
March 7-11, 2016

Meeting Committee: RAC Chairs, Council Coordinators, Orville Lind (Native Liaison), Deborah Coble (Subsistence Outreach Specialist)

Joint Session

Monday, March 7, 2015

Invocation

Keynote Speaker:

Joint Agenda Items: Common issues from annual reports (i.e., bycatch, budget, other agency actions that impact subsistence, food security, climate change)

Concurrent Sessions

One full day for each of the Councils to address their regional issues

Tuesday – three Councils

Wednesday – three Councils

Thursday – three Councils

Friday – one Council

Training

Sessions repeat throughout the week to allow all Council members opportunity to attend.

- Title VIII of ANILCA
- Robert's Rules of Order
- Federal Indian Law (with ANCSA implications)
- Cross-Cultural communication
- C&T versus 804
- Regulatory Process (State and Federal)

Reports and Panels

- Western Arctic Caribou Herd
- Yukon River salmon
- Kuskokwim River salmon
- Public Processes for Fish & Wildlife Management (RAC, SRC, AC, AMBCC)
- Holistic management – discussion and explanation of how agencies manage resources (BLM, USFWS, NPS, USFS)
- Tribal Consultation
- Different Federal Subsistence Programs (Migratory Birds, Marine Mammals, Halibut)
- Understanding Dual Management

Important to note: this one meeting will encompass the entire meeting cycle for winter 2016

JOINT FEDERAL SUBSISTENCE REGIONAL ADVISORY COUNCILS

Venue TBD
Anchorage, Alaska
March 7, 2016
8:30 a.m.

TELECONFERENCE: call the toll free number: 1-866-[number], then when prompted enter the passcode: [number]

PUBLIC COMMENTS: Public comments are welcome for each agenda item and for regional concerns not included on the agenda. The Council appreciates hearing your concerns and knowledge. Please fill out a comment form to be recognized by the Council chair. Time limits may be set to provide opportunity for all to testify and keep the meeting on schedule.

PLEASE NOTE: These are estimated times and the agenda is subject to change. Contact staff for the current schedule. Evening sessions are at the call of the chair.

AGENDA

*Asterisk identifies action item.

- 1. Invocation**
- 2. Keynote Address**
- 3. Roll Call and Establish Quorum** *(Council Coordination Division Chief)*.....
- 4. Call to Order** *(Chair)*
- 5. Welcome and Introductions** *(Chair)*
- 6. Review and Adopt Agenda*** *(Chair)*
- 7. Regional Reports**
- 8. Business** *(Chair)*
 - a. Climate Change
 - b. Food Security
 - c. Federal Subsistence Budget.....
 - d. Revisions to FRMP
 - e. Hunter Education.....
 - f. Youth Engagement.....
- 9. Agency Reports**

- a. **NPFMC** – Pollock Bycatch Update.....
- b. Status on Magnuson-Stevens Act Renewal.....
- c. Fisheries Management Overview
- d. **OSM** – Processes

Closing Comments

10. Adjourn (Chair)

To teleconference into the meeting, call the toll free number: 1-866-[number], then when prompted enter the passcode: [number]

Reasonable Accommodations

The Federal Subsistence Board is committed to providing access to this meeting for all participants. Please direct all requests for sign language interpreting services, closed captioning, or other accommodation needs to [name], 907-786-XXXX, [email], or 800-877-8339 (TTY), by close of business on [date].



All-Council Meeting Schedule

	Monday 3/7	Tuesday 3/8	Wednesday 3/9	Thursday 3/10	Friday 3/11
Main Room	<u>All day</u> Joint Session of the Councils	<u>Morning</u> Training: Title VIII of ANILCA <u>Afternoon</u> Training: Cross-cultural communication	<u>Morning</u> Training: Regulatory Process <u>Afternoon:</u> Training: Federal Indian Law	<u>Morning</u> Report: Yukon River Salmon <u>Afternoon</u> Panel: Tribal Consultation	<u>Morning</u> Training: Robert's Rules of Order <u>Afternoon</u> Panel: Understanding Dual Management
Small Room 1	All day RAC 1 – Concurrent Session YKDRAC	All day RAC 4 – Concurrent Session EIRAC	All day RAC 7 – Concurrent Session SEFRAC	All day RAC 10 – Concurrent Session KARAC	All day RAC 10 – Concurrent Session KARAC
Small Room 2	All day RAC 2 – Concurrent Session WIRAC	All day RAC 5 – Concurrent Session SCRAC	All day RAC 8 – Concurrent Session BBRAC	<u>Morning</u> RAC 8 – Concurrent Session BBRAC	<u>Morning</u> RAC 8 – Concurrent Session BBRAC
Small Room 3	All day RAC 3 – Concurrent Session SPRAC	All day RAC 6 – Concurrent Session NWARAC	All day RAC 9 – Concurrent Session NSRAC	All day RAC 9 – Concurrent Session NSRAC	All day SERAC Day 2 (if needed)
Small Room 4	<u>Morning</u> Training: Robert's Rules of Order <u>Afternoon</u> Panel: Public Processes for Fish & Wildlife Management	<u>Morning</u> Training: C&T versus Section 804 <u>Afternoon</u> Training: Cross-Cultural Communication	<u>Morning</u> Panel: Understanding Dual Management <u>Afternoon</u> Training: C&T versus Section 804	<u>Morning</u> Panel: Understanding Dual Management <u>Afternoon</u> Training: C&T versus Section 804	<u>Morning</u> Training: C&T versus Section 804 <u>Afternoon</u> Panel: Public Processes for Fish & Wildlife Management
Small Room 5	<u>Morning</u> Panel: Holistic management	<u>Morning</u> Training: Title VIII of ANILCA <u>Afternoon</u> Panel: Public Processes for Fish & Wildlife Management	<u>Morning</u> Training: Title VIII of ANILCA <u>Afternoon</u> Panel: Public Processes for Fish & Wildlife Management	<u>Morning</u> Training: Cross-Cultural Communication <u>Afternoon</u> Panel: Holistic management	<u>Morning</u> Report: WACH <u>Afternoon</u> Training: Title VIII of ANILCA
Small Room 6	<u>Morning</u> Training: Regulatory Process <u>Afternoon</u> Panel: Different Federal Subsistence Programs	<u>Morning</u> Training: Robert's Rules of Order <u>Afternoon</u> Panel: Different Federal Subsistence Programs	<u>Morning</u> Training: Robert's Rules of Order <u>Afternoon</u> Panel: Different Federal Subsistence Programs	<u>Morning</u> Training: Federal Indian Law <u>Afternoon</u> Report: Kuskokwim Salmon	<u>Morning</u> Training: Regulatory Process <u>Afternoon</u> Panel: Different Federal Subsistence Programs

TRAINING	PANELS	REPORTS (ONCE EACH)
<p>Title VIII of ANILCA (x3) Provide an overview of Title VIII and key provisions that govern Federal subsistence management.</p>	<p>Public Process for Fish & Wildlife Management (AC, RAC, SRC, AMBCC) (x3) Panel consisting of one member of an AC, RAC, SRC and AMBCC to explain how each of their processes work and how public can participate.</p>	<p>Western Arctic Caribou Herd Report from State and Federal managers on status of herd and current management objectives and approaches.</p>
<p>Cross-Cultural Communication (x3) Training to help State and Federal staff improve communication with Alaska Natives.</p>	<p>Holistic Management (x2) Conceptual panel to discuss how fish and wildlife among various agencies can be managed in a more holistic way.</p>	<p>Yukon Salmon Report from State and Federal managers on status of salmon stocks and current management objectives and approaches.</p>
<p>Robert's Rules of Order (x3) Training to benefit RAC members in the conduct of their meetings under Robert's Rules.</p>	<p>Tribal Consultation (x2) Panel consisting of Native Liaisons from R7 and OSM and Tribal leaders to discuss current consultation process and how it should work. Emphasis on what consultation means from Tribal perspective.</p>	<p>Kuskokwim Salmon Report from State and Federal managers on status of salmon stocks and current management objectives and approaches.</p>
<p>Regulatory Process (x3) Explain the regulatory process under both State and Federal systems and provide information on how to submit proposals.</p>	<p>Different Federal Subsistence Programs (Halibut, Marine Mammals, Mig Birds, OSM) (x2) Panel consisting of representatives from the various Federal programs that regulate certain subsistence activities to discuss their jurisdiction, legal authority, and approach to management.</p>	
<p>Federal Indian Law (x2) Basic principles of Federal Indian law including how it is affected by the Alaska Native Claims Settlement Act and related case law in State and Federal courts.</p>	<p>Understanding Dual Management (x2) State and Federal managers explain their jurisdictional role in managing fish and wildlife resources, how the two sometimes work together and sometimes separately.</p>	
<p>C&T versus Section 804 (x3) Provide instruction on how C&T determinations and Section 804 determinations are made, how applied, where they differ.</p>		

Winter 2016 Regional Advisory Council Meeting Calendar

March 2016 current as of 3/24/2015

Meeting dates and locations are subject to change.

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
<i>Feb. 7</i>	<i>Feb. 8</i> <i>Window Opens</i>	<i>Feb. 9</i>	<i>Feb. 10</i>	<i>Feb. 11</i>	<i>Feb. 12</i>	<i>Feb. 13</i>
<i>Feb. 14</i>	<i>Feb. 15</i> PRESIDENT'S DAY HOLIDAY	<i>Feb. 16</i>	<i>Feb. 17</i>	<i>Feb. 18</i>	<i>Feb. 19</i>	<i>Feb. 20</i>
<i>Feb. 21</i>	<i>Feb. 22</i>	<i>Feb. 23</i>	<i>Feb. 24</i>	<i>Feb. 25</i>	<i>Feb. 26</i>	<i>Feb. 27</i>
<i>Feb. 28</i>	<i>Feb. 29</i>	<i>Mar. 1</i>	<i>Mar. 2</i>	<i>Mar. 3</i>	<i>Mar. 4</i>	<i>Mar. 5</i>
<i>Mar. 6</i>	<i>Mar. 7</i>	<i>Mar. 8</i>	<i>Mar. 9</i>	<i>Mar. 10</i>	<i>Mar. 11</i>	<i>Mar. 12</i>
	All Council Meeting - Anchorage					
<i>Mar. 13</i>	<i>Mar. 14</i>	<i>Mar. 15</i>	<i>Mar. 16</i>	<i>Mar. 17</i>	<i>Mar. 18</i> <i>Window Closes</i>	<i>Mar. 20</i>

Fall 2016 Regional Advisory Council Meeting Calendar August–November 2016

Meeting dates and locations are subject to change.

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
<i>Aug. 21</i>	<i>Aug. 22</i> WINDOW OPENS	<i>Aug. 23</i>	<i>Aug. 24</i>	<i>Aug. 25</i>	<i>Aug. 26</i>	<i>Aug. 27</i>
<i>Aug. 28</i>	<i>Aug. 29</i>	<i>Aug. 30</i>	<i>Aug. 31</i>	<i>Sept. 1</i>	<i>Sept. 2</i>	<i>Sept. 3</i>
<i>Sept. 4</i>	<i>Sept. 5</i> HOLIDAY	<i>Sept. 6</i>	<i>Sept. 7</i>	<i>Sept. 8</i>	<i>Sept. 9</i>	<i>Sept. 10</i>
<i>Sept. 11</i>	<i>Sept. 12</i>	<i>Sept. 13</i>	<i>Sept. 14</i>	<i>Sept. 15</i>	<i>Sept. 16</i>	<i>Sept. 17</i>
<i>Sept. 18</i>	<i>Sept. 19</i>	<i>Sept. 20</i>	<i>Sept. 21</i>	<i>Sept. 22</i>	<i>Sept. 23</i>	<i>Sept. 24</i>
<i>Sept. 25</i>	<i>Sept. 26</i>	<i>Sept. 27</i>	<i>Sept. 28</i>	<i>Sept. 29</i>	<i>Sept. 30</i>	<i>Oct. 1</i>
<i>Oct. 2</i>	<i>Oct. 3</i>	<i>Oct. 4</i>	<i>Oct. 5</i>	<i>Oct. 6</i>	<i>Oct. 7</i>	<i>Oct. 8</i>
<i>Oct. 9</i>	<i>Oct. 10</i>	<i>Oct. 11</i>	<i>Oct. 12</i>	<i>Oct. 13</i>	<i>Oct. 14</i>	<i>Oct. 15</i>
<i>Oct. 16</i>	<i>Oct. 17</i>	<i>Oct. 18</i>	<i>Oct. 19</i>	<i>Oct. 20</i>	<i>Oct. 21</i>	<i>Oct. 22</i>
<i>Oct. 23</i>	<i>Oct. 24</i>	<i>Oct. 25</i>	<i>Oct. 26</i>	<i>Oct. 27</i>	<i>Oct. 28</i>	<i>Oct. 29</i>
<i>Oct. 30</i>	<i>Oct. 31</i>	<i>Nov. 1</i>	<i>Nov. 2</i>	<i>Nov. 3</i>	<i>Nov. 4</i> WINDOW CLOSSES	<i>Nov. 5</i>

**Department of the Interior
U. S. Fish and Wildlife Service**

Southcentral Alaska Subsistence Regional Advisory Council

Charter

- 1. Committee's Official Designation.** The Council's official designation is the Southcentral Alaska Subsistence Regional Advisory (Council).
- 2. Authority.** The Council is reestablished by virtue of the authority set out in the Alaska National Interest Lands Conservation Act (16 U.S.C. 3115 (1988)) Title VIII, and under the authority of the Secretary of the Interior, in furtherance of 16 U.S.C. 410hh-2. The Council is established in accordance with the provisions of the Federal Advisory Committee Act (FACA), as amended, 5 U.S.C. Appendix 2.
- 3. Objectives and Scope of Activities.** The objective of the Council is to provide a forum for the residents of the Region with personal knowledge of local conditions and resource requirements to have a meaningful role in the subsistence management of fish and wildlife on Federal lands and waters in the Region.
- 4. Description of Duties.** The Council possesses the authority to perform the following duties:
 - a. Recommend the initiation of, review, and evaluate proposals for regulations, policies, management plans, and other matters relating to subsistence uses of fish and wildlife on public lands within the Region.
 - b. Provide a forum for the expression of opinions and recommendations by persons interested in any matter related to the subsistence uses of fish and wildlife on public lands within the Region.
 - c. Encourage local and regional participation in the decisionmaking process affecting the taking of fish and wildlife on the public lands within the Region for subsistence uses.
 - d. Prepare an annual report to the Secretary containing the following:
 - (1) An identification of current and anticipated subsistence uses of fish and wildlife populations within the Region.
 - (2) An evaluation of current and anticipated subsistence needs for fish and wildlife populations within the Region.

- (3) A recommended strategy for the management of fish and wildlife populations within the Region to accommodate such subsistence uses and needs.
 - (4) Recommendations concerning policies, standards, guidelines, and regulations to implement the strategy.
- e. Appoint one member to the Wrangell-St. Elias National Park Subsistence Resource Commission and two members to the Denali National Park Subsistence Resource Commission in accordance with Section 808 of the Alaska National Interest Lands Conservation Act (ANILCA).
 - f. Make recommendations on determinations of customary and traditional use of subsistence resources.
 - g. Make recommendations on determinations of rural status.
 - h. Provide recommendations on the establishment and membership of Federal local advisory committees.
5. **Agency or Official to Whom the Council Reports.** The Council reports to the Federal Subsistence Board Chair, who is appointed by the Secretary of the Interior with the concurrence of the Secretary of Agriculture.
6. **Support.** The U.S. Fish and Wildlife Service will provide administrative support for the activities of the Council through the Office of Subsistence Management.
7. **Estimated Annual Operating Costs and Staff Years.** The annual operating costs associated with supporting the Council's functions are estimated to be \$160,000, including all direct and indirect expenses and 1.15 staff years.
8. **Designated Federal Officer.** The DFO is the Subsistence Council Coordinator for the Region or such other Federal employee as may be designated by the Assistant Regional Director – Subsistence, Region 7, U.S. Fish and Wildlife Service. The DFO is a full-time Federal employee appointed in accordance with Agency procedures. The DFO will:
- Approve or call all of the advisory committee's and subcommittees' meetings,
 - Prepare and approve all meeting agendas,
 - Attend all committee and subcommittee meetings,
 - Adjourn any meeting when the DFO determines adjournment to be in the public interest, and
 - Chair meetings when directed to do so by the official to whom the advisory committee reports.

9. **Estimated Number and Frequency of Meetings.** The Council will meet 1-2 times per year, and at such times as designated by the Federal Subsistence Board Chair or the DFO.
10. **Duration.** Continuing.
11. **Termination.** The Council will terminate 2 years from the date the Charter is filed, unless, prior to that date, it is renewed in accordance with the provisions of Section 14 of the FACA. The Council will not meet or take any action without a valid current charter.
12. **Membership and Designation.** The Council's membership is composed of representative members as follows:

Thirteen members who are knowledgeable and experienced in matters relating to subsistence uses of fish and wildlife and who are residents of the Region represented by the Council. To ensure that each Council represents a diversity of interests, the Federal Subsistence Board in their nomination recommendations to the Secretary will strive to ensure that nine of the members (70 percent) represent subsistence interests within the Region and four of the members (30 percent) represent commercial and sport interests within the Region. The portion of membership representing commercial and sport interests must include, where possible, at least one representative from the sport community and one representative from the commercial community.

The Secretary of the Interior will appoint members based on the recommendations from the Federal Subsistence Board and with the concurrence of the Secretary of Agriculture.

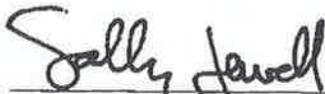
Members will be appointed for 3-year terms. A vacancy on the Council will be filled in the same manner in which the original appointment was made. Members serve at the discretion of the Secretary.

Council members will elect a Chair, a Vice-Chair, and a Secretary for a 1-year term.

Members of the Council will serve without compensation. However, while away from their homes or regular places of business, Council and subcommittee members engaged in Council, or subcommittee business, approved by the DFO, may be allowed travel expenses, including per diem in lieu of subsistence, in the same manner as persons employed intermittently in Government service under Section 5703 of Title 5 of the United States Code.

13. **Ethics Responsibilities of Members.** No Council or subcommittee member will participate in any specific party matter in which the member has a direct financial interest in a lease, license, permit, contract, claim, agreement, or related litigation with the Department.

14. **Subcommittees.** Subject to the DFO's approval, subcommittees may be formed for the purpose of compiling information and conducting research. However, such subcommittees must act only under the direction of the DFO and must report their recommendations to the full Council for consideration. Subcommittees must not provide advice or work products directly to the Agency. The Council Chair, with the approval of the DFO, will appoint subcommittee members. Subcommittees will meet as necessary to accomplish their assignments, subject to the approval of the DFO and the availability of resources.
15. **Recordkeeping.** Records of the Council, and formally and informally established subcommittees or other subgroups of the Council, shall be handled in accordance with General Records Schedule 26, Item 2, and other approved Agency records disposition schedule. These records shall be available for public inspection and copying, subject to the Freedom of Information Act, 5 U.S.C. 552.


Secretary of the Interior

NOV 25 2013

Date Signed

DEC 03 2013

Date Filed



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