Federal Subsistence Board Public Meeting

Meeting Materials - Volume II

Pages 419-628

April 2-5, 2024
Anchorage, Alaska

Volume II

Non-Consensus Agenda Wildlife Proposals, Closure Reviews, and other documents

What's Inside…

Page

i Meeting Agenda
iii Consensus Agenda
v Non-Consensus Agenda

Non-Consensus Agenda Wildlife Proposals and Closure Reviews
419 WP24-01
448 WP24-02/03
489 WP24-04
629 WP24-05
782 WP24-06
942 WP24-09
979 WP24-12/13/14
998 WP24-15
1028 WCR24-04/06
1054 WP24-19
1071 WCR24-38
1083 WP24-21
1115 WP24-25
1136 WP24-26
1174 WCR24-20
1202 WP24-30/31
1229 WP24-33
1250 WP24-36
1261 WCR24-21
1304 WP24-37/38
1328 WCR24-31

Cover Photo: Female Lynx by Lisa Hupp, USFWS.

Other Agenda Items

1354 RFR22-01 - Request for Reconsideration
1364 SCRAC Unit 6 Deer - Request to Change DAL
1366 Cordova RD Unit 6 Deer Moose DAL
1370 Togiak NWR Caribou - Request to Change DAL
1374 Togiak NWR Unit 17A 17C Nushagak Caribou DAL

Draft as of February 12, 2024

FEDERAL SUBSISTENCE BOARD
PUBLIC MEETING AGENDA
April 2 – 5, 2024

April 2, 2024: 1:30 p.m. to 5:00 p.m. (or until recessed)
April 3 - 5, 2024: 9:00 a.m. to 5:00 p.m. (or until recessed) daily
Lakefront Anchorage Hotel, 4800 Spenard Road
Anchorage, Alaska

A toll-free number will be shared on our website in advance of the meeting

On April 2, prior to the start of the Public Meeting, the Federal Subsistence Board will meet at 9:00 a.m. to conduct Tribal Government-to-Government and ANCSA Corporation consultations regarding proposals to change Federal subsistence management regulations for the harvest of wildlife on Federal Public lands and waters in Alaska. **The Public Meeting will begin at 1:30 p.m**.

Updates on the Board's progress through the agenda will be posted on the Federal Subsistence Management Program website at https://www.doi.gov/subsistence/board/ and on Facebook at www.facebook.com/subsistencealaska.
Updates may also be received by calling (800) 478-1456 or (907) 786-3888.

Public Meeting

*** Asterisk denotes Action Item**

1. **Call to Order and Welcome**

2. **Review and Adopt Agenda***

3. **Federal Subsistence Board Information Sharing Session**

4. **Regional Advisory Council Chairs Discuss Topics of Concern with the Board**

5. **Public Comment Period on Non-Agenda Items**
   (This opportunity is available at the beginning of each day)

6. **2021–2023 Subparts C&D Proposals and Closure Reviews** *(Wildlife Regulations)*

   a. Tribal Government-to-Government and ANCSA Corporation Consultation Summary

   b. Announcement of Consensus Agenda *(see detailed agenda that follows)*

   c. Public Comment Period on Consensus Agenda Items *(This opportunity is available at the beginning of each subsequent day prior to the final action)*

   d. Board deliberation and action on Non-Consensus Agenda items*
   (see detailed agenda that follows)

e. Adoption of Consensus Agenda*

7. RFR22-01 Request for Reconsideration of Fisheries Proposal FP21-10 *

8. Delegation of Authority Letters* *(Requests to change existing letters)*

a. Unit 6 Deer

b. Units 17A & 17C Nushagak Caribou

9. Council Correspondence to the Board Update

10. Schedule of Upcoming Board Meetings*

a. 2024 Summer Work Session and Executive Session *(Council Annual Report Replies & Council Appointment Recommendations)*

b. 2025 Winter Public Meeting *(Fish and Shellfish Regulations – Date Options)*

11. Adjourn

FEDERAL SUBSISTENCE BOARD

CONSENSUS AGENDA

The following proposals and closure reviews have been included on the consensus agenda. These are proposals and closure reviews for which there is agreement among Federal Subsistence Regional Advisory Councils, the Federal Interagency Staff Committee, and the Alaska Department of Fish and Game concerning Board action. Anyone may request that the Board remove a proposal or closure review from the consensus agenda and place it on the regular agenda. The Board retains final authority for removal of proposals and closure reviews from the consensus agenda. The Board will take final action on the consensus agenda after deliberation and decisions on all other proposals and closure reviews.

Proposal/Closure Review	Unit/Species	Recommendations	Page
WP24-07	Units 7, 14C / Furbearers	Oppose	1
WP24-08	Units 7, 15 / All	Support	11
WCR24-03	Unit 7 / Moose	Retain Status Quo	24
WCR24-41	Unit 6 / Moose	Rescind the Closure	41
WP24-10	Unit 8 / Brown Bear	Support	66
WP24-16 & 17	Unit 9E / Caribou	Support	86
WP24-18	Unit 17 / Caribou	Support	109
WP24-20	Unit 18 / Moose	Support	134
WP24-22	Unit 18 / Muskox	Support	163
WP24-23	Unit 18 / Muskox	Support	177
WP24-24	Unit 19 / All	Support with OSM Modification	193
WCR24-43	Unit 19 / Moose	Retain Status Quo	200
WP24-27	Units 22, 23 / Muskox	Support	218
WCR24-10	Unit 22 / Muskox	Retain Status Quo	268
WCR24-28	Unit 22 / Muskox	Retain Status Quo	280
WCR24-29	Unit 22 / Muskox	Retain Status Quo	305
WCR24-30	Unit 22 / Muskox	Retain Status Quo	319
WCR24-44	Unit 22 / Muskox	Retain Status Quo	330
WCR24-15	Unit 22 / Moose	Retain Status Quo	344
WCR24-19	Unit 23 / Muskox	Rescind the Closure	361
WCR24-35	Unit 12 / Caribou	Retain Status Quo	373
WCR24-42	Unit 12 / Caribou	Retain Status Quo	396
WP24-34	Unit 25D West / Moose	Withdrawn	NA
WP24-35	Unit 25D West / Moose	Withdrawn	NA

FEDERAL SUBSISTENCE BOARD

NON-CONSENSUS AGENDA

Procedure for considering proposals:

Analysis (*Lead Author*)

Summary of public comments (*OSM Staff*)

Open floor to public testimony

Tribal/Alaska Native Corporation comments (*Native Liaison*)

Regional Advisory Council recommendation(s) (*Chair or designee*)

Alaska Department of Fish and Game comments (*State Liaison*)

Interagency Staff Committee comments (*ISC Chair*)

Federal Subsistence Board discussion with Council Chairs and State Liaison

Federal Subsistence Board action

Proposal/Closure Review	Region/Location/Species	Page
WP24-01	Statewide / Brown Bear	419
WP24-02/03	Unit 1C / Goat	448
WP24-04	Unit 4 / Deer	489
WP24-05	Unit 4 / Deer	629
WP24-06	Unit 4 / Deer	782
WP24-09	Units 13A, 13B / Caribou	942
WP24-11	Unit 8 / Deer	Supplemental
WP24-12/13/14	Unit 9B / Moose	979
WP24-15	Unit 9C / Caribou	989
WCR24-04/06	Unit 9C & 9E / Caribou	1028
WP24-19	Unit 18 / Moose	1054
WCR24-38	Unit 18 / Moose	1071
WP24-21	Unit 18 / Moose	1083
WP24-25	Units 24A, 24B / Sheep	1115
WP24-26	Units 24A, 26B / Sheep	1136
WCR24-20	Unit 24 / Moose	1174
WP24-28	Units 21D, 22, 23, 24, 26A / Caribou	Supplemental
WP24-29	Unit 23 / Caribou	Supplemental

Proposal/Closure Review	Region/Location/Species	Page
WP24-30/31	Unit 23 / Caribou	1202
WP24-32	Units 12, 19, 20, 21, 24, 25 / Marten	Supplemental
WP24-33	Units 25B, 25C, 25D / Moose	1229
WP24-36	Unit 25A / Sheep	1250
WCR24-21	Unit 25A / Sheep	1261
WP24-37/38	Unit 26C / Muskox	1304
WCR24-31	Unit 26 / Moose	1328

This page intentionally left blank

WP24-01 Executive Summary	
General Description	Proposal WP24-01 is a request to allow the sale of brown bear hides. *Submitted by: Kaleb Rowland*
Proposed Regulation	**§___.25 Subsistence taking of fish, wildlife, and shellfish: general regulations** *(j) Utilization of fish, wildlife, or shellfish* . . . *(13) You may sell the raw/untanned and tanned hide or cape from a legally harvested **brown bear**, caribou, deer, elk, goat, moose, musk ox, and sheep.*
OSM Conclusion	**Support** Proposal WP24-01 with **modification** to allow the sale of brown bear hides with claws attached in areas where the Federal harvest limit is two bears every regulatory year and after first obtaining a permit available at the time of sealing from an ADF&G sealing officer. The modified regulation should read: **§___.25 Subsistence taking of fish, wildlife, and shellfish: general regulations** *(j) Utilization of fish, wildlife, or shellfish* . . . *(13) You may sell the raw/untanned and tanned hide or cape from a legally harvested caribou, deer, elk, goat, moose, musk ox, sheep, **and brown bear with claws attached harvested in an area with a two brown bear limit per regulatory year in Federal regulations only after first obtaining a permit at the time of sealing from the Alaska Department of Fish and Game.***
Southeast Alaska Subsistence Regional Advisory Council Recommendation	**Take no action**

Southcentral Alaska Subsistence Regional Advisory Council Recommendation	**Support**
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	**Support**
Bristol Bay Subsistence Regional Advisory Council Recommendation	**Support**
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation	**Oppose**
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	**Support** with the **OSM modification**
Seward Peninsula Subsistence Regional Advisory Council Recommendation	**Support** with the **OSM modification**
Northwest Arctic Subsistence Regional Advisory Council Recommendation	**Support**
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	**Support** with the **Council modification** to also allow the sale of black bear hides
North Slope Subsistence Regional Advisory Council Recommendation	**Support** with the **OSM modification**
Interagency Staff Committee Comments	Varying support or opposition statements were provided by Regional Subsistence Advisory Council's across the regions based on differing cultural practices. Council recommendations and actions vary from support, support with modifications, to no action taken, and

	opposition. Therefore, it is relevant to note that the Board can support or oppose this proposal for each region individually, or regulations could state that these practices "may be allowed". The recommended modification by the Office of Subsistence Management (OSM) is based on The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) requirements, and the ability of the State to seal hides. CITES is designed to protect threatened populations of brown bears elsewhere in North America, outside of Alaska, but selling the hide of a brown bear legally harvested in Alaska is allowed only if the State of Alaska issues a permit reporting that the sale will not be detrimental to the survival of brown bears in the wild.
ADF&G Position	**Support** with the **OSM modification**
Written Public Comments	**None**

STAFF ANALYSIS
WP24-01

ISSUE

Proposal WP24-01, submitted by Kaleb Rowland of McCarthy, Alaska, is a request to allow the sale of brown bear hides.

DISCUSSION

The proponent states subsistence users in many areas of Alaska must salvage the hides of brown bears, however, the hides must not be sold. The proponent continues that the hides of many other legally harvested big game species may be sold, and brown bears should be added to this regulation.

Existing Federal Regulation

§___.25 Subsistence taking of fish, wildlife, and shellfish: general regulations

. . .

(j) Utilization of fish, wildlife, or shellfish

. . .

(13) You may sell the raw/untanned and tanned hide or cape from a legally harvested caribou, deer, elk, goat, moose, musk ox, and sheep.

Proposed Federal Regulation

§___.25 Subsistence taking of fish, wildlife, and shellfish: general regulations

. . .

(j) Utilization of fish, wildlife, or shellfish

. . .

(13) You may sell the raw/untanned and tanned hide or cape from a legally harvested ***brown bear****, caribou, deer, elk, goat, moose, musk ox, and sheep.*

Existing State Regulation

5 AAC 92.200—Purchase and sale of game

. . .

(b) Except as provided in 5 AAC 92.031, a person may not purchase, sell, advertise, or otherwise offer for sale:

(1) any part of a brown bear, except an article of handicraft made from the fur of a brown bear, and except skulls and hides with claws attached of brown bears harvested in areas where the bag limit is two bears per regulatory year by permit issued under 5 AAC 92.031;*

***Note**: The harvest limit for a resident hunting in Units 16B, 17, 19A, 19D, 20E, 21, 22A, 22B, 22D, 22E, 23, 24B, 25D, and 26A is two brown bears per regulatory year. A person may not take more than one brown bear, statewide, in any regulatory year, except that in these units, a person may take two brown bears per regulatory year (*5 AAC 92.132 Bag limit for brown bears*).

Additionally, at its meeting January 26–29, 2024, the Alaska Board of Game increased the harvest limit in Unit 18 to 2 brown bears per year (Proposal 17) (ADF&G 2024).

5 AAC 92.031 - Permit for selling skins, skulls, and trophies

. . .

(g) A person may sell, advertise, or otherwise offer for sale a skull or hide with claws attached of a brown bear harvested in an area where the bag limit is two brown bears per regulatory year only after first obtaining a permit from the department. Any advertisement must include the permit number assigned by the department, and the department will permanently mark all hides and skulls intended for sale. All bears sold under this permit must be reported to the department within the time frame specified on the permit.*

***Note**: A “Permit to Sell a Brown/Grizzly Bear Hide and/or Skull" is available at the time of sealing from the sealing officer.

Extent of Federal Public Lands

Federal public lands comprise approximately 54% of Alaska and consist of 20% U.S. Fish and Wildlife Service managed lands, 15% Bureau of Land Management managed lands, 14% National Park Service managed lands, and 6% U.S. Forest Service managed lands.

Customary and Traditional Use Determinations

This is a statewide proposal. For more information refer to the customary and traditional use determinations at *§___.24 Customary and traditional use determinations*.

Background

Convention on International Trade in Endangered Species of Wild Fauna and Flora

We classify all Alaskan brown/grizzly bears as the same species, *Ursus arctos*, but refer to them differently depending on where they are found and their diet. In general, the common name "brown bear" refers to those *Ursus arctos* found in the coastal regions, and the common name "grizzly bear" refers to those brown bears found in the interior.

Abundant brown bear populations still exist in Alaska. Brown bears once ranged from northern Alaska and western Canada south to Mexico, and from the west coast east across the great plains of the United States. Over the last 200 years, the number and range of brown bears south of Canada has declined by more than 95% largely as a result of excessive human caused mortality and habitat loss. In 1990, fewer than 1,000 brown bears remained in the United States south of the Canadian border. Today, Alaska is home to more than 98% of the brown bear population in the United States and 70% of the brown bears in North America. With the demise of brown bears in other areas, Alaska has become a preferred place for hunters seeking brown bear trophies (ADF&G 2000, Schoen 1990).

The United States has signed onto the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). CITES is an international treaty between the United States and other countries. Since 1975 through this treaty, North American brown bears have been considered likely to be in danger of becoming threatened by extinction if sales of brown bear parts are not strictly regulated and monitored. CITES is designed to protect threatened populations of brown bears elsewhere in North America, outside of Alaska, but selling the hide of a brown bear legally harvested in Alaska is allowed only if the State of Alaska issues a permit reporting that the sale will not be detrimental to the survival of brown bears in the wild. Additionally, a person then must get a CITES export permit to export a brown bear hide out of the United States. In Alaska, almost all sales of brown bear parts, especially gall bladders and paws, is illegal. The State of Alaska allows some sales of brown bear hides with claws attached and skulls (USFWS 2023).

Hunters in Canada, our closest neighboring country, also follow these CITES requirements. Hunters can legally hunt for brown bears in four provinces and territories in Canada (Yukon, Northwest Territories, Nunavut, and British Columbia). A hunter needs a provincial or territorial permit to legally possess, sell, and export brown bear parts. A person must possess a CITES export permit to export a brown bear hide out of Canada. Canada prohibits almost all trade in brown bear parts, including gall bladders and paws (some exceptions apply to Aboriginal groups for personal or ceremonial use). Canada allows some manufactured, non-food items, such as tanned hides, to be sold, but such trade in brown bear parts is low. In Canada, people who sell brown bear parts are mainly selling hunting trophies (skins, rugs, or taxidermy mounts) (Government of Canada 2012, 2014).

Sales of Brown Bear Hides

People have sold and exported brown bear hides from Alaska for centuries. During the Russian Period in Alaska, the Russian American Company exported large numbers of brown bear hides to St. Petersburg and Asia (Bockstoce 2009).

The United State began efforts to keep brown bear populations in Alaska healthy with the passage of the Game Law of 1908 that implemented hunting seasons and a licensing system for brown bear parts being shipped out of Alaska. The new law limited exports to three brown bear hides annually per person and implemented a $5 dollar fee on each hide. The primary deterrent to the sale and export of brown bear hides from Alaska was the export limit and fee (Holzworth 1930).

The United States eliminated sales of big game, including brown bears, and their parts in the game law of 1925 and established the Alaska Game Commission, the predecessor to the Alaska Department of Fish and Game (ADF&G). The Commission was responsible for imposing and revising brown bear seasons and harvest limits in Alaska. However, lack of enforcement of the law and increases in sport and trophy hunting, especially for big coastal bears, continued to threaten brown bear populations in some areas of Alaska. The law exempted Alaska Natives who were still permitted to hunt game, including brown bears, at any time of year for food and to sell game hides within Alaska unless otherwise restricted (Dufresne 1965).

Beginning in 1961, after Alaska became a state, the government of the State of Alaska began restricting the harvest and use of brown bears in Alaska even more. The State prohibited the purchase, sale, or barter of brown bears or their parts (State of Alaska 1961). In 1961, the State introduced brown bear salvage and sealing requiring a hunter to retrieve the hide with claws attached and skull so that scientific information regarding the sex, age, and hide quality of harvested bears could be obtained by biologists. In 1968, the State introduced a harvest limit of one brown bear every four years in all areas of Alaska open to brown bear hunting. Beginning in 1977, the State required all hunters to purchase a tag before hunting a brown bear. However, in much of rural Alaska, participation by subsistence users was very limited, and few subsistence harvests were reported through this system (Thornton 1992).

Brown Bear Sealing

Sealing requirements imposed by the State of Alaska help to track the sale of wildlife parts, to validate that an animal is legally harvested, and to provide documentation to allow people traveling to another country to obtain a CITES permit for the item to be legally taken across international borders (OSM 2010). For example, during Alaska Board of Game deliberations on Proposal 57 (sale of brown bear hides with claws attached and/or skulls, see Regulatory History, below) in March 2016, Alaska Wildlife Troopers testified that law enforcement tracks internet activity and attempts to verify permit and sealing records when bear products are encountered. Very few brown bear hides had been encountered. At the time of the testimony, all bear hides sold by Alaska residents were appropriately harvested under an intensive management permit. These permits are for the purpose of removing predators, such as brown bear, to recover depleted populations of moose and caribou (ADF&G 2023a).

For brown bears, sealing means taking the skull and hide (with claws and evidence of sex attached) of the bear you killed to an officially designated "sealing officer." The skull must be skinned from the hide (*5 AAC 92.165 - Sealing of bear skins and skulls*). Hides and skulls are permanently marked by ADF&G (*5 AAC 92.990 – Definitions*).

State of Alaska Western/Northwestern Alaska Brown Bear Management Areas

In 1992, the Alaska Board of Game adopted the Western Alaska and Northwestern Alaska brown bear management areas and more liberal subsistence harvesting regulations. The Board of Game lengthened brown bear subsistence harvest seasons in most of these areas to September 1–May 31 and increased harvest limits to one brown bear every year. Under subsistence regulations, Alaska residents did not have to seal brown bears unless the hide or skull was being removed from the wildlife management unit or presented for commercial tanning. An Alaska resident hunting in these management areas needed to have a State subsistence registration permit and to salvage the meat, but the hide and skull need not be salvaged.

Over time the Alaska Board of Game has further modified these regulations. Currently, State subsistence registration hunts in which the hide and skull need not be sealed, unless removed from the management unit or presented for commercial tanning, occur in Unit 9B, all drainages in Unit 9E that drain into the Pacific Ocean between Cape Kumliun and the border of Unit 9D and Unit 9E, Unit 17, Unit 18, that portion of Units 19A and 19B downstream of and including the Aniak River drainage, Unit 21D, Unit 22, Unit 23, Unit 24, and Unit 26A (*5 AAC 92.165 Sealing of bear skins and skulls*).

Regulatory History

Customary Trade

In 1992, the Federal Subsistence Board adopted final Federal subsistence regulations in which it defined customary trade to be the following: "*Customary trade means cash sale of fish and wildlife resources regulated herein, not otherwise prohibited by Federal law or regulation, to support personal and family needs; and does not include trade which constitutes a significant commercial enterprise*" (*§___.4 Definitions*). The Board said it would continue to refine the definition of customary trade (57 Fed. Reg. 104, 22941 [May 29, 1992]). Customary trade is part of the definition of subsistence uses in Federal regulations. [1]

The Board's customary-trade focus has been refining regulations to address two issues on a region-by-region basis. One is the sale of salmon and the second is the sale of handicrafts that incorporate brown bear claws. The Board appointed working groups to propose regulations with input from the Subsistence Regional Advisory Councils. In 2003, the Board adopted regulations defining a significant

[1] *Subsistence means the customary and traditional uses by rural Alaska residents of wild, renewable resources for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation; for the making and selling of handicraft articles out of nonedible byproducts of fish and wildlife resources taken for personal or family consumption; for barter, or sharing for personal or family consumption; and for* ***customary trade*** *(§___.4 Definitions)*

commercial enterprise of salmon in some regions of the state and requiring a permit and reporting of customary trades of salmon in other regions of the state (*§___.27(b)(11)(i)* and *(ii)*; *§___.27(b)(12)*). In 2012, the Board adopted regulations allowing the sale of handicrafts that incorporate brown bear claws (*§___.25(j)(7)(ii)*). To allow the sale of handicrafts incorporating brown bear claws, a modification to the sealing certificate, which is managed by the State of Alaska, was required to include a place on the certificate indicating that the bear was harvested by a Federally qualified subsistence user (*§___.25(j) Utilization of fish, wildlife, or shellfish*, see regulations in the **Appendix**) (68 Fed. Reg. 81, 22309, [April 28, 2003]; 77 Fed. Reg. 114, 35498 [June 13, 2012]).

Sales of Brown Bear Hides

In 2002, Proposal WP02-01, submitted by a resident of Fort Yukon, requested the Federal Subsistence Board to classify black bears and brown bears as furbearers, which opened up the possibility that bear hides may be sold: "*If you are a Federally qualified subsistence user, you may sell the raw fur or tanned pelt with or without claws attached from legally harvested furbearers"* (*§___25(j)(8)*).

Regional Advisory Councils differed in their recommendations. The Southeast Alaska Council was the only one that supported legalizing the sale of brown bear and black bear hides. The Southeast Alaska Council justification read,

> The Council was in favor of full use of subsistence resources and did not believe that allowing sale of bear parts would increase bear harvests, promote illegal trade, or cause conservations concerns. The Council noted that hunting regulations for bear limit the number of bears that can be taken and that sale of parts of legally taken bears would provide only a minor financial return to the harvester. There were no conservation concerns for the brown bear population under existing management; the southeast population is healthy, and fewer bears are taken than the harvest guideline would allow. This change in classification would not affect other users and could be positive for subsistence users (OSM 2002: 23).

One Council supported the sale of black bear pelts only, and five other Councils supported allowing the sale of only handcrafts that incorporate black bear fur (thereby aligning Federal and State regulations). One Council said the sale of bear parts could threaten bear populations and was not a customary and traditional use in the region. A Western Interior Alaska Council member abstained from voting on the proposal because of a cultural taboo that women do not talk about bears. Two Councils said that such decisions should be made on a region-by-region basis and not statewide (OSM 2002). The Board adopted a motion to only allow the sale of handicrafts incorporating black bear fur: "*If you are a Federally qualified subsistence user, you may sell handicraft articles made from the skin, hide, pelt, or fur, including claws, of a black bear"* (*§___.25(j)(6)*) (67 Fed. Reg. 125, 43711 [June 28, 2002]).

In 2006, the Alaska Board of Game adopted regulations to allow the sale of raw brown bear hides, with claws attached, harvested in specific predator control management areas under a State permit: "*After the skin and skull is sealed as required under 5 AAC 92.165(a), a person may sell*

the untanned skin, with claws attached, and skull of a brown bear taken in an active brown bear predator control area listed in 5 AAC 92.125 only under a permit issued by the department" (*5 AAC 92.031(d)*). The purpose of predation control is to recover depleted prey populations such as moose and caribou (ADF&G 2006a, 2006b:5, 2023a).

In 2016, the Alaska Board of Game adopted Proposal 57 to allow the sale of brown bear hides and/or skulls by Alaska residents in units where the harvest limit is two bears annually: "*A person may sell, advertise, or otherwise offer for sale a skull or hide with claws attached of a brown bear harvested in an area where the bag limit is two brown bears per regulatory year. . . .*" (*5 AAC 92.031(g)*). Currently, these units with two-bear harvest limits in State regulations are 16B, 17, 18, 19A, 19D, 20E, 21, 22A, 22B, 22D, 22E, 23, 24B, 25D, and 26A (*5 AAC 92.132 Bag limit for brown bears*) (ADF&G 2016a, 2016b:32, 2016c:5, 2024).

In 2018, the Federal Subsistence Board rejected the recommendations of affected Councils on Proposal WP18-44 to allow the sale of brown bear hides with claws attached and/or skulls in Unit 23. The Board said black markets for illegally acquired brown bear parts were known to encourage poaching and increasing market availability for brown bear parts may intensify illegal harvest. The Board also noted there was insufficient evidence that residents of Unit 23 had an established pattern of customary trade involving brown bear hides and skulls, and few residents of Unit 23 harvested brown bears under the Federal subsistence regulation due to meat salvage and sealing requirements. The lack of a component to the proposal that would require a permit for sale in line with State regulations was also a factor in the Board's justification for rejecting the proposal (OSM 2018).

Current Federal General Regulations

Federal subsistence regulations prohibit the sale of wildlife or their parts unless specifically allowed under Federal subsistence regulations: "*You may not exchange in customary trade or sell fish or wildlife or their parts, taken pursuant to the regulations in this part, unless provided for in this part*" (*§___.7(b) Restriction on use*).

One specific authorization in Federal subsistence regulations for the sale of the non-edible byproducts of brown bears harvested for subsistence is for handicrafts: "*If you are a Federally qualified subsistence user, you may sell handicraft articles made from the skin, hide, pelt, or fur, including claws, of a brown bear taken from Units 1–5, 9A–C, 9E, 12, 17, 20, 22, 23, 24B (only that portion within Gates of the Arctic National Park), 25, or 26"* (*§___.23(j) Utilization of fish, wildlife, or shellfish*).

Federal subsistence regulations define a brown bear hide as having claws attached: *". . . skin, hide, or pelt of a bear shall mean the entire external covering with claws attached"* (*§___.23(a) Definitions*).

Additionally, customary trade shall not constitute a significant commercial enterprise: *Customary trade means exchange for cash of fish and wildlife resources regulated in this part, not otherwise prohibited by Federal law or regulation, to support personal and family needs; and does not include trade which constitutes a significant commercial enterprise* (§___*.4 Definitions*). Sales that rise to the level of a

significant commercial enterprise are not defined on a statewide basis and instead may be defined on a region-by-region basis by placing monetary caps on sales and/or requiring permits for and reporting of customary trades (see examples of these regulations in **Appendix 1** at *§___.27 Subsistence taking of fish*).

Biological Background

Brown bears on Kodiak Island are the only distinct subspecies (*Ursus arctos middendorffi)* because they are genetically and physically isolated from other *Ursus arctos*. However, all "grizzly bears" and "brown bears" are considered "brown bears" for purposes of harvest in Alaska.

Alaska has an estimated 30,000 brown bears statewide (ADF&G 2023b). Brown bears range throughout most of Alaska, except the islands of the Aleutian Chain west of Unimak and in Southeast Alaska south of Frederick Sound. High densities of brown bears occur on Kodiak Island, the Alaska Peninsula, and on Admiralty, Baranof, and Chichagof Islands of Southeast Alaska. The density of brown bears in Alaska varies considerably with habitat and ranges anywhere from 2.6 bears/1,000 km^2 on the North Slope (Lenart 2021) to 275 bears/1,000 km^2 in Southeast Alaska (Bethune 2021), although these estimates are extrapolated from an estimate derived from a reanalysis of 20-year-old data. Except for breeding pairs and females with offspring, brown bears are typically solitary creatures and avoid the company of other bears.

Brown bear populations are extremely sensitive to disruption. This is because brown bears exhibit the lowest reproduction rate of any North American mammal. In some areas with low population densities, such as in northern Alaska, brown bear populations are often managed conservatively for several reasons, including the following: (1) large home ranges are required to meet resource needs (McLoughlin et al. 2002); (2) female brown bears generally do not successfully reproduce until they are more than five years old and have low reproductive rates, small litters, and long intervals between litters; (3) sows exhibit high fidelity to home ranges with little out-migration or in-migration; and (4) monitoring methods are imprecise and expensive (USFWS 1982, Reynolds 1989, Miller et al. 2011)

Brown bears are difficult to survey precisely due to their solitary nature and their sensitivity to disturbance, as is evident from the lack of current population data. Statewide, population estimates are sometimes based on surveys conducted in the 1990s or early 2000s and extrapolated to arrive at a current estimate. For example, in Unit 4 in Southeast Alaska, there has not been a population estimate for brown bears for almost two decades (Bethune 2021). Historically, ADF&G estimated densities of between 227 and 275 bears/1000 km^2, with a population estimate of 4,303 bears in Unit 4. In Unit 13, there is currently no population monitoring (Hatcher 2023). The last population estimate was in 1998 and it estimated 1,260 bears in the wildlife management unit, with a density of 21.3 bears/1,000 km^2. In Units 25 and 26 current population estimates are based on models using population data from 1999. These calculations give an estimated density of 2.6 bears/1,000 km^2, with a non-statistically derived estimate of 333 bears for Unit 26B (Lenart 2021).

Most population data collected is from sealing records of harvested brown bears. In some areas, brown bears harvested under Federal or State subsistence regulations are not required to be sealed except

under certain conditions. Where sealing is not required, a Federal or a State hunting permit is required that sometimes allows for the collection of similar data to sealing records The data collected from each is used to assess trends in harvest and to inform in-season management actions (Bethune 2021).

Harvest History

Harvest levels of brown bears have generally increased over the last 40 years with harvest peaking in the early 2010s followed by a downward trend to the current year (ADF&G 2022).

ADF&G has not detected increased harvest in wildlife management units with a two-bear harvest limit where the sale of the hides with claws attached has been legal under State regulations since 2016. Although brown bear harvests increased slightly (then decreased right back to "normal" levels) when brown bears were first allowed to be taken over bait, hunting seasons were also being lengthened that might have contributed to this slight increase in harvest around the same time. ADF&G staff have been instructed to issue sale permits to anyone that harvests a brown bear in a two-bear harvest limit area that might possibly be interested in selling it in the future (Bogle 2023, pers. comm.; Weber 2023, pers. comm.). As of August 2022, ADF&G had distributed 38 sale permits for hunts across 10 subunits and had received seven sale notifications from permit holders (Paragi 2023, pers. comm.).

In addition to a State tag or permit, a Federal subsistence permit has been available in some areas of Alaska to harvest brown bears since 1995. In the 20 years from 2002 to 2021, 158 subsistence hunters have reported harvesting a total of 40 brown bears by Federal permit cumulatively from Units 5, 8, 9, and in the Southcentral Alaska Region (OSM 2023). Subsistence hunters use these Federal permits because it allows them to hunt in areas where there is competition in the State system to obtain permits (for example draw hunts in Units 8), where there formerly was competition in the State system to obtain permits (for example in Unit 15), the hunt area is on National Park or Monument lands (such as in Unit 9), which are closed to the harvest of brown bears except by subsistence users, or in areas with more liberal Federal harvest limits (in Unit 5 for example).

Cultural Knowledge and Traditional Practices

Alaska Natives have harvested bears and competed with them for subsistence resources for at least 14,000 years (Birkedal 2001). Brown bears have traditionally been a very important part of the Alaska Native cultures. Because of their powerful senses and ability to hear through the ground, brown bears are usually referred to indirectly and respectfully so that they will continue to give themselves to hunters. For this reason, the Yup'ik call them *ungungssiq* (land animal, quadruped), *naparngali* (one who stands upright) or *kavirluq* (red thing, as opposed to *tan'gerliq*, black bear)" (Fienup-Riordan 2007:164). Athabaskans call the brown bear *ghonoy*, *ghonoy tlaaga* or *dlil ta bahoolaanee*. Tlingits call it *yats'inEt* or *ya'Et'gu tutw'adi'at*. The Iñupiat call it *aklaq*.

Brown bears have been hunted for their meat and hides, and other parts of the bear have been used for traditional medicine or fashioned into tools, amulets, ceremonial regalia, and art (Thornton 1992, Nelson 1983, Fall and Hutchinson-Scarborough 1996, Loon and Georgette 1989, Behnke 1981, ADF&G 1990).

Nelson (1983) reports that the brown bear takes an apex of power among Koyukon Athabascan spirits of the natural world, perhaps below only the wolverine. People's behavior toward the brown bear is subject to a number of culturally based requirements. Nelson (1983) reports that disregard or violation of these cultural requirements is sharply punished. Traditionally, when Koyukon men hunted brown bears, they followed prescribed rituals. For example, a man is not to openly discuss the brown bear hunt before or after it occurs, and care must be taken to prevent the hide from coming in contact with women. The Koyukon Athabascans have a taboo against women eating brown bear meat or young men eating meat from a brown bear's head (Nelson 1983).

Dena'ina Athabascans in the Lake Clark and Katmai areas competed directly with brown bears for subsistence resources; it is thought that the Dena'ina likely displaced brown bear from the very best salmon fishing sites on certain rivers (Birkedal 2001). The Dena'ina reserved some secondary stream drainages for the exclusive use of bears and for bear hunting.

It is reported that Alutiiq residents of the Alaska Peninsula believed that bears are human ancestors that must be shown respect (Sherwonit 1998). In the Chignik Bay, Chignik Lagoon, Chignik Lake, Ivanof Bay and Perryville areas, brown bear hunting is governed by a system of traditional Alutiiq beliefs that emphasize respectful treatment of the bear and protection of the hunters (Fall and Hutchinson-Scarborough 1996). According to these traditions, the skull and hide of the bear are left at the kill site; the skull is placed facing in a southern or southeastern direction.

Traditional brown bear hunting in Southeast Alaska was surrounded by numerous behavioral prescriptions that were considered vital to the success of the hunt. Brown bears are an important symbol of Tlingit social and ceremonial life, and there is emphasis on the close relationship between humans and bears (Thornton 1992). Bear hides were used for ceremonial robes, clothing, rugs and bedding. Thornton (1992) reported that the Tlingit traditionally preferred brown bear hides for children's bedding, as the hides provided not only warmth, but also were thought to prevent illnesses.

Loon and Georgette (1989) and Georgette (2001) described the widespread respect of the Iñupiat for bears and the belief that the bears must be treated appropriately. An Iñupiat man is not to openly discuss the bear hunt before or after it occurs. Traditionally, the bear's head is given to the eldest member of the community or hung on a tree or pole in camp. The Iñupiat give the bear hide to an elder or use it for bedding and clothing.

It has been customary practice of some Yup'ik villagers to use bear hides for mattresses, trimming on clothing and skin for boats and to bury the bear's skull facing east at the kill site. Brown bear harvesting is a specialized pursuit that is concentrated in certain villages and certain families (Coffing 1991).

Effects of the Proposal

If Proposal WP24-01 is adopted, the sale of the hide of a brown bear legally harvested from Federal public lands under Federal regulations will be legal as long as the edible meat is salvaged for human consumption, claws are attached to the hide, and the hide is sealed by a representative of ADF&G.

However, this outcome might conflict with CITES and State regulations implementing CITES. CITES provides for the commercial trade of hides of legally harvested brown bears only if the state of export issues permits reporting that the trade will not be detrimental to the survival of the species in the wild. The State of Alaska currently issues these permits but only for the sale of the hides of brown bears legally harvested in areas with a two-brown bear harvest limit under State regulations (in Units 16B, 17, 18, 19A, 19D, 20E, 21, 22A, 22B, 22D, 22E, 23, 24B, 25D, and 26A).

It is already legal under State regulations to sell the hide of brown bears legally harvested in areas of Alaska where the harvest limit is two brown bears per year except for lands designated as National Park or Monument, which are only open to hunting under Federal subsistence regulations. Effects on nonsubsistence users are not anticipated. Effects on the resource, specifically whether, or how much, the harvest of brown bears will increase is anticipated to be minimal due to permit and salvage requirements.

If Proposal WP24-01 is not adopted, the sale of brown bear hides will not be legal under Federal regulations but will remain legal in areas of Alaska under State regulations where the harvest limit is two brown bears per year including on most Federal public lands, except for lands designated as National Park or Monument. No effects on nonsubsistence users or the resource are anticipated.

OSM CONCLUSION

Support Proposal WP24-01 **with modification** to allow the sale of brown bear hides with claws attached in areas where the Federal harvest limit is two bears every regulatory year and after first obtaining a permit available at the time of sealing from an ADF&G sealing officer.

The modified regulation should read:

§___.25 Subsistence taking of fish, wildlife, and shellfish: general regulations

(j) Utilization of fish, wildlife, or shellfish

. . .

(13) You may sell the raw/untanned and tanned hide or cape from a legally harvested caribou, deer, elk, goat, moose, musk ox, sheep, ***and brown bear with claws attached harvested in an area with a two brown bear limit per regulatory year in Federal regulations only after first obtaining a permit at the time of sealing from the Alaska Department of Fish and Game.****

***Note**: Harvest limits of two brown bears per regulatory year in 2022–2024 Federal regulations include all or portions of Units 22B, 22D, 23, 24B, 25D, and 26A. A “Permit to Sell a Brown/Grizzly Bear Hide and/or Skull" is available at the time of sealing from the sealing officer.

Justification

Conservation is a concern regarding brown bear populations in Alaska for several reasons including their low productivity rates, their solitary nature, difficulty obtaining population estimates, and high sport use in some areas. The OSM modification to the proposal puts limits on sales of brown bear hides. The sale of brown bear hides could only occur for brown bears shown to be legally harvested from Federal public lands under Federal regulations, and only in areas where there is a two-brown bear harvest limit in Federal regulations. Currently, such areas are all or portions of Units 22B, 22D, 23, 24B, 25D, and 26A. Further, the edible meat must be salvaged (*§___.25(j)(2)(ii)*), the hide must have the claws attached (*§___.25(a)*), and the hide must be sealed by ADF&G before it can be removed from the wildlife management unit (*§___.26(j)*).

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) provides for the commercial trade of hides of legally harvested brown bears only if the state of export issues permits reporting that the trade will not be detrimental to the survival of the species in the wild. Therefore, a permit from ADF&G is required. The Alaska Department of Fish and Game issues this type of permit before selling the hide of a brown bear legally harvested under State regulations but only in areas with a two-brown bear harvest limit. Allowing the sale of the hide of a brown bear harvested from other areas would require negotiation with the State over the use of its permitting system.

Limiting legal sales to only brown bears taken from areas with two-bear harvest limits would be a protection from over harvest because there is likely to be fewer conservation concerns. Other tools exist for the Board to use if harvests were to rise above sustainable yields in an area. These tools include reducing seasons and harvest limits, placing monetary caps on sales on a region-by-region bases, and requiring permits for and reporting of customary trades.

This is a statewide proposal that was reviewed by all 10 Regional Advisory Councils. Each Council informed the Board whether the regulation was culturally appropriate for their region.

LITERATURE CITED

ADF&G. 1990. Determining customary and traditional uses of selected populations of goat, black bear, brown bear, mountain goat and moose in Southeast Alaska. Report to the Board of Game. Subsistence Div. Juneau, AK. 45 pages.

ADF&G. 2000. Kenai Peninsula brown bear conservation strategy. ADF&G, Div. of Wildlife Conservation. Juneau, AK. 84 pages.

ADF&G. 2006a. Meeting Summary, Statewide Cycle A. January 27–30, 2006, meeting of the Alaska Board of Game in Anchorage. Juneau, AK.
https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=01-01-2007&meeting=all

ADF&G. 2006b. 2006–2007 Alaska hunting regulations governing general, subsistence, commercial uses of Alaska's wildlife. Juneau, AK. 112 pages.

ADF&G. 2015. Alaska Board of Game meeting information. Board Support Section, Juneau, AK. http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=01-08-2015&meeting=juneau, accessed May 19.

ADF&G. 2016a. Alaska Board of Game meeting information. Statewide Regulations Cycle A&B, March 18-28, 2016. Fairbanks, AK. Meeting audio. http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/swf/2015-2016/20160318_statewide/indexlan, accessed August 23, 2017.

ADF&G. 2016b. Analysis and recommendations. Alaska Board of Game statewide regulations meeting March 18–26, 2016, in Fairbanks, AK. Juneau, AK. 10 pages.

ADF&G. 2016c. Meeting summary. Alaska Board of Game statewide regulations meeting March 18–26, 2016 in Fairbanks, AK. Juneau, AK. 10 pages.

ADF&G. 2022. Intensive management briefing. Alaska Board of Game meeting, March 4–12, 2022, in Fairbanks. Department Reports and Recommendations. Table 1.1 Intensive Management. 12 pages. https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=03-04-2022&meeting=fairbanks, retrieved July 31, 2023.

ADF&G. 2023a. Intensive management in Alaska: Alaska's predator control programs. Juneau, AK. https://www.adfg.alaska.gov/index.cfm?adfg=intensivemanagement.programs

ADF&G. 2023b. Brown/grizzly bear hunting in Alaska: life history. http://www.adfg.alaska.gov/index.cfm?adfg=brownbearhunting.main, accessed May 3, 2023. Juneau, AK.

ADF&G. 2023c. Important information for all bear hunters: tag requirements, salvage and evidence of sex, sealing. requirements. http://www.adfg.alaska.gov/index.cfm?adfg=brownbearhunting.resources, accessed May 3, 2023.

ADF&G. 2024. Preliminary actions on proposals, updated January 31, 2024. Alaska Board of Game, Western Arctic/Western Region Meeting, Kotzebue, Alaska, January 26–29, 2024. Juneau, AK. 4 pages.

Behnke, S. 1981. Subsistence use of brown bear in the Bristol Bay Area: a review of available information. ADF&G, Div. of Subsistence Tech. Paper No. 46. Juneau, AK.

Bethune, S. W. 2021. Brown bear management report and plan, Game Management Unit 4: Report period 1 July 2014–30 June 2019, and plan period 1 July 2019–30 June 2024. ADF&G Div. of Wildlife Conservation, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-13, Juneau, AK.

Birkedal, T. 2001. Ancient hunters in the Alaskan wilderness: human predators and their role and effect on wildlife populations and the implications for resource management. Pages 228-234 *in* W. E. Brown and S. D. Veirs, editors. 7th Conf. on Resources and Resource Man. in Parks and on Public Lands. 479 pages.

Bockstoce, J.R. 2009. Furs and frontiers in the far North: the contest among Native and foreign nations for the Bering Strait fur trade. Yale University Press. 475 pages.

Bogle, S. Wildlife biologist. Personal communication: email. ADF&G Division of Wildlife Conservation, Juneau, AK.

Coffing, M. W. 1991. Kwethluk subsistence: contemporary land use patterns, wild resource harvest and use and the subsistence economy of a lower Kuskokwim River area community. ADF&G, Div. of Subsistence Tech. Paper No. 157. Juneau, AK. 244 pages.

Courtright, A.M. 1968. Game harvests in Alaska. Federal Aid in Wildlife Restoration Report. Juneau, Ak. 70 pages.

Dufresne, F. 1965. No room for bears. Holt Rinehart and Winston, New York.

Fall, J. A. and L B. Hutchinson-Scarborough. 1996. Subsistence uses of brown bears in communities of Game Management Unit 9E, Alaska Peninsula, Southwest Alaska. ADF&G, Div. of Subsistence Tech. Paper No. 235. Juneau, AK. 17 pages.

Fienup-Riordan, A. 2007. *Yuungnaqpiallerput*, the way we genuinely live: masterworks of Yup'ik science and survival. University of Washington Press, Seattle, WA.

Georgette, S. 2001. Brown bears on the northern Seward Peninsula, Alaska: traditional knowledge and subsistence uses in Deering and Shishmaref. ADF&G, Div. of Subsistence Tech. Paper No. 248. Juneau, AK. 48 pages.

Government of Canada. 2012. Grizzly bear (*Ursus arctos*): COSEWIC assessment and status report 2012. Ottawa, Ontario. https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/cosewic-assessments-status-reports/grizzly-bear-2012.html#_Toc330973003.

Government of Canada. 2014. Grizzly bear: non-detriment finding. Ottawa, Ontario. https://www.canada.ca/en/environment-climate-change/services/convention-international-trade-endangered-species/non-detriment-findings/gizzly-bear.html

Harper, P. and L.A. McCarthy, editors. 2015. Brown bear management report of survey-inventory activities 1 July 2012–30 June 2014. ADF&G Div. of Wildlife Conservation, Species Management Report ADF&G/DWC/SMR-2015-1, Juneau, AK.

Hatcher, H. L. 2023. Brown bear management report and plan, Game Management Unit 13: Report period 1 July 2014–30 June 2019, and plan period 1 July 2019–30 June 2024. ADF&G Div. of Wildlife Conservation, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-8, Juneau, AK.

Holzworth, J.M. 1930. The wild grizzlies of Alaska. G.P. Putnam's Sons, New York.

Lenart, E. A. 2021. Brown bear management report and plan, Game Management Units 25A, 25B, 25D, 26B, and 26C: Report period 1 July 2014–30 June 2019, and plan period 1 July 2019–30 June 2024. ADF&G Div. of Wildlife Conservation, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-17, Juneau, AK.

Loon, H. and S. Georgette. 1989. Contemporary brown bear use in Northwest Alaska. ADF&G, Div. of Subsistence Tech. Paper No. 163. Juneau, AK. 58 pages.

Miller, S.D. 1993. Brown bears in Alaska: a statewide management overview. Wildlife Technical Bulletin No. 11. ADF&G, Div. of Wildlife Conservation. Juneau, AK. 40 pages.

Miller, S.D. and J. W. Schoen. 1999. Status of management of the brown bear in Alaska. Pages 40-46. *in* C. Servheen, S. Herroro, and B. Peyton, editors. Bears-Status survey and conservation action plan. IUCN/SSC Bear and Polar Bear Specialist Group, IUCN, Gland, Switzerland and Cambridge, UK. 309 pages.

Nelson, R. K. 1983. Making prayers to the raven: a Koyukon view of the northern forest. Univ. of Chicago Press, Chicago, IL. 292 pages.

OSM. 2002. Staff analysis WP02-01. Pages 1–24 *in* Federal Subsistence Board Meeting Materials. May 13–15, 2002, in Anchorage. Office of Subsistence Management, USFWS. Anchorage, AK.

OSM. 2004. Staff analysis Proposal WP04-01. Pages 15–20 *in* Federal Subsistence Board Meeting Materials. May 18–24 in Anchorage. Office of Subsistence Management, USFWS. Anchorage, AK.

OSM. 2010. Minutes of the Brown Bear Claw Handicraft Working Group meeting on July 29, 2010. Unpublished document. Meeting held at USFWS Regional Office in Anchorage, AK.

OSM. 2018. Enclosure, 805(c) letter to the Chair of the Northwest Arctic Subsistence Regional Advisory Council from the Chair of the Federal Subsistence Board. On file, USFWS, Anchorage, AK.

OSM 2023. Federal Subsistence Permit System. Electronic database, accessed May 2, 2023. USFWS, Anchorage, AK.

Paragi, T. 2023. Wildlife biologist. Personal communication: by email. ADF&G Division of Wildlife Conservation, Fairbanks, AK.

Reynolds, H.V. 1987. Populations dynamics of a hunted grizzly bear population in the northcentral Alaska Range. ADF&G Div. of Wildlife Conservation. Juneau, AK.

Reynolds, H. 2001. Wildlife Biologist. Personal communication: email. ADF&G Div. of Wildlife Conservation, Fairbanks, AK.

Robison, H.L. 2017. Wildlife Biologist. Personal communication: e-mail. Western Arctic National Parklands, National Park Service. Kotzebue, AK.

Servheen C. 1999. The trade in bear and bear parts. Pages 33-46 *in* C. Servheen, S. Herroro, and B. Peyton, editors. Bears status survey and conservation action plan. IUCN/SSC Bear and Polar Bear Specialist Group, IUCN, Gland, Switzerland and Cambridge, UK. 309 pages.

Sherwonit, B. 1998. Alaska bears: grizzlies, black bears, and polar bears. Alaska Northwest Books, Portland, OR. 108 pages.

Sherwood, M. 1979. Specious speciation in the political history of the Alaska brown bear. Pages 49–60 *in* Western Historical Quarterly 10 (January).

State of Alaska. 1961. Alaska Game Regulations, No. 2. ADF&G, Juneau, AK. 33 pages.

Suring, L. and G. Del Frate. 2002. Spatial analysis of locations of brown bears killed in defense of life or property on the Kenai Peninsula, Alaska. Ursus, 13.

Thornton, T. G. 1992. Subsistence use of brown bear in Southeast Alaska. ADF&G Div. of Subsistence Tech. Paper No. 214. Juneau, AK. 95 pages.

USFWS. 2023. Grizzly bear. ECOS Environmental Conservation Online System. Anchorage, AK. https://ecos.fws.gov/ecp/species/7642

Weber, N. 2023. Regulations Program Coordinator. Personal communication: email. ADF&G Division of Wildlife Conservation. Juneau, AK.

SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Southeast Alaska Subsistence Regional Advisory Council

Take no action. The Council wanted to know more about other regions' traditions and Council recommendations before making a recommendation on this statewide proposal.

Southcentral Alaska Subsistence Regional Advisory Council

Support. The Council supported the proposal as written for the Southcentral Alaska Region because there is a one-brown bear harvest limit and therefore the OSM modification would not satisfy the proponent. The proposal will be beneficial to residents of smaller communities to help them make a living.

Kodiak/Aleutians Subsistence Regional Advisory Council

Support. The OSM modification would not have allowed the sale of brown bear hides in the Kodiak/Aleutians region because the harvest limits are at most one brown bear per regulatory year. The Council had considerable discussions and concerns about whether residents of the Kodiak/Aleutians Region would consider it culturally appropriate to allow for the sale of brown bear hides or if it would lead to a significant, unsustainable increase in brown bear harvests in their region. However, the Council voted to support the proposal as written by the proponent because they believed that the proposal would allow subsistence users in their region to utilize the resource more fully, while potentially making some additional money off brown bear harvests to offset the high costs of living in rural Alaska.

Bristol Bay Alaska Subsistence Regional Advisory Council

Support. The Council said allowing brown bear hides to be sold without a limit on how many times the hide could be resold would not negatively impact brown bear populations and would create additional economic opportunities for subsistence users.

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

Oppose. The Council opposed the sale of brown bear hides because of a concern for an increase in harvest rates to an unsustainable level if the sale of hides was allowed. The Council noted that it is difficult to obtain accurate population estimates for brown bears and that the bears have a slow reproductive rate. The Council thought this issue might best be dealt with on a region-by-region basis rather than a statewide basis because different areas have different brown bear population sizes and cultural values related to their harvest and use.

Western Interior Alaska Subsistence Regional Advisory Council

Support with the **OSM modification**. The Council said the regulation will allow subsistence users in their region to utilize this resource more fully, while potentially making some additional money to

subsidize their subsistence way of life. The recommended OSM modification, to allow this in areas where there is a two-brown bear harvest limit, would put this regulation in line with State regulation.

Seward Peninsula Subsistence Regional Advisory Council

Support with the **OSM modification.** The Council was in support of OSM's modification as Unit 22 has a two-brown bear harvest limit. The Council noted that more bears have been seen in this unit in the last few years and that while currently bears are not seen as a food resource, they have been in the past and while facing times of other food shortages, they may become a more common food source again. The Council also noted that this could be a way to help support a subsistence way of life.

Northwest Arctic Subsistence Regional Advisory Council

Support. The Council supported the proposal as written because the change will better align State and Federal regulations, with the understanding that there will be administrative hurdles. The change will also increase the capacities of subsistence users to sell brown bears from their regions.

Eastern Interior Alaska Subsistence Regional Advisory Council

Support with the Council **modification** to include black bear hides in the regulation. The Council supported the modification to also allow the sale of black bear hides because there are no conservation concerns for black bear populations in the region and the sale of black bear hides is allowed under State regulations. Currently federally qualified subsistence users are being restricted from fully utilizing brown and black bears by the prohibition on the sale of hides. Some federally qualified subsistence users are harvesting and eating a lot more bears because salmon, moose, and caribou numbers are low. Some users report that they have bear hides piling up because they do not know what to do with them all.

The modification would read:

§___.25 Subsistence taking of fish, wildlife, and shellfish: general regulations

. . .

(j) Utilization of fish, wildlife, or shellfish

. . .

(13) You may sell the raw/untanned and tanned hide or cape from a legally harvested ***black bear, brown bear****, caribou, deer, elk, goat, moose, musk ox, and sheep.*

North Slope Subsistence Regional Advisory Council

Support with the **OSM modification.** The Council said the North Slope Region has a two-bear harvest limit, the proposal will not affect hunting opportunities, and it will allow for the sale of hides.

INTERAGENCY STAFF COMMITTEE COMMENTS

Varying support or opposition statements were provided by Regional Subsistence Advisory Council's across the regions based on differing cultural practices. Council recommendations and actions vary from support, support with modifications, to no action taken, and opposition. Therefore, it is relevant to note that the Board can support or oppose this proposal for each region individually, or regulations could state that these practices "may be allowed".

The recommended modification by the Office of Subsistence Management (OSM) is based on The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) requirements, and the ability of the State to seal hides. CITES is designed to protect threatened populations of brown bears elsewhere in North America, outside of Alaska, but selling the hide of a brown bear legally harvested in Alaska is allowed only if the State of Alaska issues a permit reporting that the sale will not be detrimental to the survival of brown bears in the wild.

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

Alaska Department of Fish and Game Comments

Wildlife Proposal WP24-01
Proposal WP24-01 requests to allow the sale of brown bear hides. The proponent states federally qualified subsistence users in many areas of Alaska must salvage the hides of brown bears, however, the hides must not be sold. The hides of many other legally harvested big game species may be sold.

Position
The Alaska Department of Fish and Game (ADF&G) **SUPPORTS** the proposal if it is modified to only allow the sale of brown bear hides with claws attached in areas where the federal harvest limit is two bears every regulatory year and after first obtaining a permit available at the time of sealing from an ADF&G sealing officer. The state allows the sale of brown bear hides in certain units where the bag limit is two brown bears per regulatory year. There is a harvest limit of two or more brown bears per regulatory year in 2022/23 State regulations for all or portions of Units 16, 17, 19A, 19D, 19E, 20E, 21, 22A, 22B, 22D, 22E, 23, 24B, 25D, 26A. The Alaska Board of Game (BOG) recently added Unit 18 to the list beginning in regulatory year 2024.

Background
Harvest levels of brown bears have generally increased over the last 40 years with harvest peaking in the early 2010s and a downward trend to the current year.

The Federal Subsistence Board (FSB) should note that Effective July 1, 2016, the BOG allowed the sale of raw and tanned brown bear hides (with claws attached) and skulls of legally taken brown bears harvested in areas with a two brown bear bag limit (which at the time was Units 16B, 17, 19A, 19D, 20E, 22A, and 25D). Effective July 1, , the board required a permit for the activity. In between (and since), the board added to the areas that have a two-bear bag limit.

The effect of the sale of hides is difficult to determine since multiple factors may affect harvest levels. For example, harvest of brown bears increased slightly in 2016 when the sale of brown bear hides were permitted from intensive management areas where liberalized hunting bag limits existed but returned to presale levels within a few of years. Season lengths have also been increased in association with intensive management activities. Evaluating the effects of these individual changes on harvest is difficult to assess because of the confounding influence of multiple factors occurring simultaneously. Regardless, harvest levels, following liberalization in methods and means for brown bears in recent decades, have generally returned to pre-liberalization levels relatively quickly.

Impact on Subsistence Users
Federally Qualified Users (FQUs) can sell handicraft articles made from the hide of brown bear under current federal regulations. If this proposal is adopted, there will be fewer conditions or regulations that come into effect. If, however, this change results in increased brown bear harvest, especially in coastal areas, local bear hunting opportunities could be affected.

Impact on Other Users
If adopted, there would be little anticipated effect on nonfederally qualified users (NFQUs) if there is no increase in brown bear harvest by FQUs. However, if this change results in an increased brown bear harvest, especially in coastal areas, then guided bear hunting and associated economic impacts could be affected negatively.

Opportunity Provided by State

State customary and traditional use findings: The BOG has made positive customary and traditional use findings for brown bears throughout many areas of Alaska.

Conservation Issues
There are no conservation issues known to be associated with the sale of brown bear hides. The FSB should note that the sale of brown bear hides has not been broadly allowed in coastal areas where trophy value and potential demand may be higher, and a conservation concern could develop from the selling of bear hides in these areas. The FSB should do its utmost to discuss potential unintended consequences of passing this proposal as written. The BOG sought to address these concerns by limiting sale of hides to areas where they found a two brown bear limit was warranted.

Enforcement Issues
If the federal regulations match the state, there is unlikely to be any enforcement concerns. The current proposal appears to apply statewide which could result in some confusion among users and law enforcement personnel.

Appendix 1

Relevant Federal Regulations

§___.4 Definitions

The following definitions apply to all regulations contained in this part:

. . .

Customary trade means exchange for cash of fish and wildlife resources regulated in this part, not otherwise prohibited by Federal law or regulation, to support personal and family needs; and does not include trade which constitutes a significant commercial enterprise.

. . .

Subsistence means the customary and traditional uses by rural Alaska residents of wild, renewable resources for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation; for the making and selling of handicraft articles out of nonedible byproducts of fish and wildlife resources taken for personal or family consumption; for barter, or sharing for personal or family consumption; and for customary trade.

§___.25 Subsistence taking of fish, wildlife, and shellfish: general regulations

(a) Definitions

. . .

Bear *means black bear, or brown or grizzly bear.*

. . .

Big game *means black bear, brown bear, bison, caribou, Sitka black-tailed deer, elk, mountain goat, moose, musk ox, Dall sheep, wolf, and wolverine.*

. . .

Edible meat *means . . For black bear, brown and grizzly bear, "edible meat" means the meat of the front quarter and hindquarters and meat along the backbone (backstrap).*

. . .

Handicraft *means a finished product made by a rural Alaskan resident from the nonedible byproducts of fish or wildlife and is composed wholly or in some significant respect of natural materials. The shape and appearance of the natural material must be substantially changed by the skillful use of hands, such as sewing, weaving, drilling, lacing, beading, carving, etching, scrimshawing, painting, or other means, and incorporated into a work of art, regalia, clothing, or other creative expression, and can be either traditional or contemporary in design. The*

handicraft must have substantially greater monetary and aesthetic value than the unaltered natural material alone.

. . .

Sealing *means placing a mark or tag on a portion of a harvested animal by an authorized representative of the ADF&G; sealing includes collecting and recording information about the conditions under which the animal was harvested, and measurements of the specimen submitted for sealing, or surrendering a specific portion of the animal for biological information.*

. . .

Skin, hide, pelt, or fur *means any tanned or untanned external covering of an animal's body. However, for bear, the skin, hide, pelt, or fur means the external covering with claws attached.*

. . .

Trophy *means a mount of a big game animal, including the skin of the head (cape) or the entire skin, in a lifelike representation of the animal, including a lifelike representation made from any part of a big game animal; "trophy" also includes a "European mount" in which the horns or antlers and the skull or a portion of the skull are mounted for display.*

(j) Utilization of fish, wildlife, or shellfish

. . .

(2) If you take wildlife for subsistence, you must salvage the following parts for human use:

. . .

(ii) The hide and edible meat of a brown bear, except that the hide of brown bears taken in Units 5, 9B, 17, 18, portions of 19A and 19B, 21D, 22, 23, 24, and 26A need not be salvaged;

. . .

(7) If you are a Federally qualified subsistence user, you may sell handicraft articles made from the skin, hide, pelt, or fur, including claws, of a brown bear taken from Units 1–5, 9A–C, 9E, 12, 17, 20, 22, 23, 24B (only that portion within Gates of the Arctic National Park), 25, or 26.

(i) In Units 1, 2, 3, 4, and 5, you may sell handicraft articles made from the skin, hide, pelt, fur, claws, bones, teeth, sinew, or skulls of a brown bear taken from Units 1, 4, or 5.

(ii) Prior to selling a handicraft incorporating a brown bear claw(s), the hide or claw(s) not attached to a hide must be sealed by an authorized Alaska Department of Fish and Game representative. Old claws may be sealed if an affidavit is signed indicating that the claws came from a brown bear harvested on Federal public lands by a Federally qualified user. A copy of the Alaska Department of Fish and Game sealing certificate must accompany the handicraft when sold.

. . .

(13) You may sell the raw/untanned and tanned hide or cape from a legally harvested caribou, deer, elk, goat, moose, musk ox, and sheep.

§___.26 Subsistence taking of wildlife.

. . .

(j) Sealing of bear skins and skulls.

(1) Sealing requirements for brown bear taken apply in all Units, except as specified in this paragraph (j). Sealing requirements for black bears of all color phases taken apply in Units 1–7, 13–17, and 20.

(2) You may not possess or transport from Alaska the untanned skin or skull of a bear unless the skin and skull have been sealed by an authorized representative of ADF&G in accordance with State or Federal regulations, except that the skin and skull of a brown bear taken under a registration permit in Units 5, 9B, 9E, 17, 18, 19A, and 19B downstream of and including the Aniak River drainage, and Units 21D, 22, 23, 24, and 26A need not be sealed unless removed from the area.

(3) You must keep a bear skin and skull together until a representative of the ADF&G has removed a rudimentary premolar tooth from the skull and sealed both the skull and the skin; however, this provision does not apply to brown bears taken within Units 5, 9B, 9E, 17, 18, 19A, and 19B downstream of and including the Aniak River drainage, and Units 21D, 22, 23, 24, and 26A and which are not removed from the Unit.

(i) In areas where sealing is required by Federal regulations, you may not possess or transport the hide of a bear that does not have the penis sheath or vaginal orifice naturally attached to indicate conclusively the sex of the bear.

(ii) If the skin or skull of a bear taken in Units 9B, 17, 18, and 19A and 19B downstream of and including the Aniak River drainage is removed from the area, you must first have it sealed by an ADF&G representative in Bethel, Dillingham, or McGrath; at the time of sealing, the ADF&G representative must remove and retain the skin of the skull and front claws of the bear.

(iii) If you remove the skin or skull of a bear taken in Units 21D, 22, 23, 24, and 26A from the area or present it for commercial tanning within the area, you must first have it sealed by an ADF&G representative in Barrow, Galena, Nome, or Kotzebue; at the time of sealing, the ADF&G representative must remove and retain the skin of the skull and front claws of the bear.

(iv) If you remove the skin or skull of a bear taken in Unit 5 from the area, you must first have it sealed by an ADF&G representative in Yakutat.

(v) If you remove the skin or skull of a bear taken in Unit 9E from Unit 9, you must first have it sealed by an authorized sealing representative. At the time of sealing, the representative must remove and retain the skin of the skull and front claws of the bear.

(4) You may not falsify any information required on the sealing certificate or temporary sealing form provided by the ADF&G in accordance with State regulations.

§___.27 Subsistence taking of fish

. . .

(b) Methods, means, and general restrictions.

. . .

(11) Transactions between rural residents. Rural residents may exchange in customary trade subsistence-harvested fish, their parts, or their eggs, legally taken under the regulations in this part, for cash from other rural residents. The Board may recognize regional differences and regulates customary trade differently for separate regions of the State.

(i) Bristol Bay Fishery Management Area—The total cash value per household of salmon taken within Federal jurisdiction in the Bristol Bay Fishery Management Area and exchanged in customary trade to rural residents may not exceed $500.00 annually.

(ii) Upper Copper River District—The total number of salmon per household taken within the Upper Copper River District and exchanged in customary trade to rural residents may not exceed 50 percent of the annual harvest of salmon by the household. No more than 50 percent of the annual household limit may be sold under paragraphs (b)(11) and (12) of this section when taken together. These customary trade sales must be immediately recorded on a customary trade recordkeeping form. The recording requirement and the responsibility to ensure the household limit is not exceeded rests with the seller.

(iii) Customary trade of Yukon River Chinook salmon may only occur between Federally qualified rural residents with a current customary and traditional use determination for Yukon River Chinook salmon.

(12) Transactions between a rural resident and others. In customary trade, a rural resident may exchange fish, their parts, or their eggs, legally taken under the regulations in this part, for cash from individuals other than rural residents if the individual who purchases the fish, their parts, or their eggs uses them for personal or family consumption. If you are not a rural resident, you may not sell fish, their parts, or their eggs taken under the regulations in this part. The Board may recognize regional differences and regulates customary trade differently for separate regions of the State.

(i) Bristol Bay Fishery Management Area—The total cash value per household of salmon taken within Federal jurisdiction in the Bristol Bay Fishery Management Area and exchanged in customary trade between rural residents and individuals other than rural residents may not exceed $400.00 annually. These customary trade sales must be immediately recorded on a customary trade recordkeeping form. The recording requirement and the responsibility to ensure the household limit is not exceeded rest with the seller.

(ii) Upper Copper River District—The total cash value of salmon per household taken within the Upper Copper River District and exchanged in customary trade between rural residents and individuals other than rural residents may not exceed $500.00 annually. No more than 50 percent of the annual household limit may be sold under paragraphs (b)(11) and (12) of this section when taken together. These customary trade sales must be immediately recorded on a customary trade recordkeeping form. The recording requirement and the responsibility to ensure the household limit is not exceeded rest with the seller.

(iii) Customary trade of Yukon River Chinook salmon may only occur between Federally qualified rural residents with a current customary and traditional use determination for Yukon River Chinook salmon.

WP24-02/03 Executive Summary	
General Description	Wildlife Proposal WP24-02 requests to extend the mountain goat season in Unit 1C within the drainages of the Chilkat Range south to the south bank of the Endicott River to Jul. 24 – Dec. 31. *Submitted by*: *Nicholas Orr* Wildlife Proposal WP24-03 requests to extend the mountain goat sesaon in Unit 1C within the drainages of the Chilkat Range south to the south bank of the Endicott River to Aug. 1 – Nov. 30, and to close mountain goat hunting in this area to non-federally qualified users from Aug. 1-31. *Submitted by*: *Southeast Alaska Subsistence Regional Advisory Council*
Proposed Regulation	**WP24-02** **Unit 1C – Goat** ***Unit 1C, drainages of the Chilkat Range south of the south bank of the Endicott River—1 goat by State registration permit only*** — ***July 24-Dec. 31*** *Unit 1C, that portion draining into Lynn Canal and Stephens Passage between Antler River and Eagle Glacier and River, ~~and all drainages of the Chilkat Range south of the Endicott River~~ – 1 goat by State registration permit only* — *Oct. 1-Nov. 30.* **WP24-03** **Unit 1C - Goat** ***Unit 1C, drainages of the Chilkat Range south of the south bank of the Endicott River—1 goat by State registration permit only*** — ***Aug. 1-Nov. 30*** ***Federal public lands are closed to goat hunting Aug. 1-Aug. 31, except by federally qualified subsistence users hunting under these regulations.*** *Unit 1C, that portion draining into Lynn Canal and Stephens Passage between Antler River and Eagle Glacier and River, ~~and all drainages of the Chilkat Range south of the Endicott River~~ – 1 goat by State registration permit only* — *Oct. 1-Nov. 30.*

WP24-02/03 Executive Summary	
OSM Conclusion	**Support** WP24-02 with **modification** to extend the Federal goat season in the proposal area to Jul. 15 – Dec. 31. **Oppose** WP24-03 The modified regulations should read: **Unit 1C – Goat** ***Unit 1C, drainages of the Chilkat Range south of the south bank of the Endicott River—1 goat by State registration permit only*** — ***July 15-Dec. 31*** *Unit 1C, that portion draining into Lynn Canal and Stephens Passage between Antler River and Eagle Glacier and River, ~~and all drainages of the Chilkat Range south of the Endicott River~~ – 1 goat by State registration permit only* — *Oct. 1-Nov. 30.*
Southeast Alaska Subsistence Regional Advisory Council Recommendation	**Support** WP24-02 **with OSM Modification** **Take no Action** on WP24-03
Interagency Staff Committee Comments	The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.
ADF&G Position	**Oppose**
Written Public Comments	**1 Oppose** WP24-02 **3 Oppose** WP24-03

STAFF ANALYSIS
WP24-02/03

ISSUES

Proposal WP24-02, submitted by Nicholas Orr of Juneau, requests to extend the mountain goat season in Unit 1C within the drainages of the Chilkat Range south of the south bank of the Endicott River (RG015 Permit Area) to Jul. 24 –Dec. 31. This hunt area will be abbreviated at Unit 1C, Endicott.

Proposal WP24-03, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Southeast Council), requests to extend the mountain goat season in Unit 1C, Endicott (RG015 permit area) to Aug. 1 – Nov. 30 and to close this area to mountain goat hunting by non-federally qualified users from Aug. 1—31 (see **Figures 1**, **2**).

Both proposals are being analyzed together below because they are similar.

DISCUSSION

The proponent of WP24-02 states that extending the Federal subsistence season for mountain goat would provide a more meaningful priority for federally qualified subsistence users in Unit 1C on Federal public lands within the drainages of the Chilkat Range south to the south bank of the Endicott River (RG015 Permit Area). Similarly, the proponents of WP24-03 submitted their proposal to establish a meaningful preference for the continuation of subsistence uses of goat in the same area of Unit 1C (RG015 Permit Area).

The proponents of WP24-03 note that the proposal area (RG015 Permit Area) was the site of a timber sale in the 1970s, which created logging roads near alpine zones. The renovated docking area at the Couverden log transfer facility now has a ramp where people can unload 4-wheelers and hunt goats via the Couverden logging road system. However, there is only room to anchor three to four boats at once here, without worrying about boats getting blown away. This creates access issues. The logging roads also provide relatively easy access to alpine zones. People set up camps, which block the roads and prevent access to the best areas to hunt goats, limiting opportunities for federally qualified subsistence users who must compete with non-federally qualified users for limited access. The proponents note that a priority opportunity to hunt goats during the month of August without competition from non-federally qualified users is important because the State moose season opens on September 15, and this area gets more crowded after the moose season opens.

Existing Federal Regulation

Unit 1C - Goat

Unit 1C, that portion draining into Lynn Canal and Stephens Passage between Antler River and Eagle Glacier and River, and all drainages of the Chilkat Range south of the Endicott River – 1 goat by State registration permit only	*Oct. 1-Nov. 30.*

Proposed Federal Regulation

WP24-02

Unit 1C – Goat

Unit 1C, drainages of the Chilkat Range south of the south bank of the Endicott River—1 goat by State registration permit only	***July 24-Dec. 31***
Unit 1C, that portion draining into Lynn Canal and Stephens Passage between Antler River and Eagle Glacier and River, ~~and all drainages of the Chilkat Range south of the Endicott River~~ – 1 goat by State registration permit only	*Oct. 1-Nov. 30.*

WP24-03

Unit 1C - Goat

Unit 1C, drainages of the Chilkat Range south of the south bank of the Endicott River—1 goat by State registration permit only	***Aug. 1-Nov. 30***
Federal public lands are closed to goat hunting Aug. 1-Aug. 31, except by federally qualified subsistence users hunting under these regulations.	
Unit 1C, that portion draining into Lynn Canal and Stephens Passage between Antler River and Eagle Glacier and River, ~~and all drainages of the Chilkat Range south of the Endicott River~~ – 1 goat by State registration permit only	*Oct. 1-Nov. 30.*

Existing State Regulation

Unit 1C - Goat

1C, drainages of the Chilkat Range south of the south bank of the Endicott River.	*Residents – 1 goat by permit, available online or in person in Douglas, Haines, and Petersburg beginning July 13*	*RG015*	*Aug. 1-Nov. 30*
	Nonresidents – 1 goat by by permit, available online or in person in Douglas, Haines, and Petersburg beginning July 13	*RG015*	*Sept. 1-Nov. 30*

Extent of Federal Public Lands/Waters

Federal public lands comprise approximately 95% of Unit 1C and consist of 62% U.S. Forest Service (USFS) managed lands, and 33% National Park Service (NPS) managed lands. The Federal lands involved in the current proposals are those of the RG015 Permit Area, which is located within the Tongass National Forest, between the drainages of the Chilkat Range, south of the south bank of the Endicott River (see **Figures 1** & **2**).

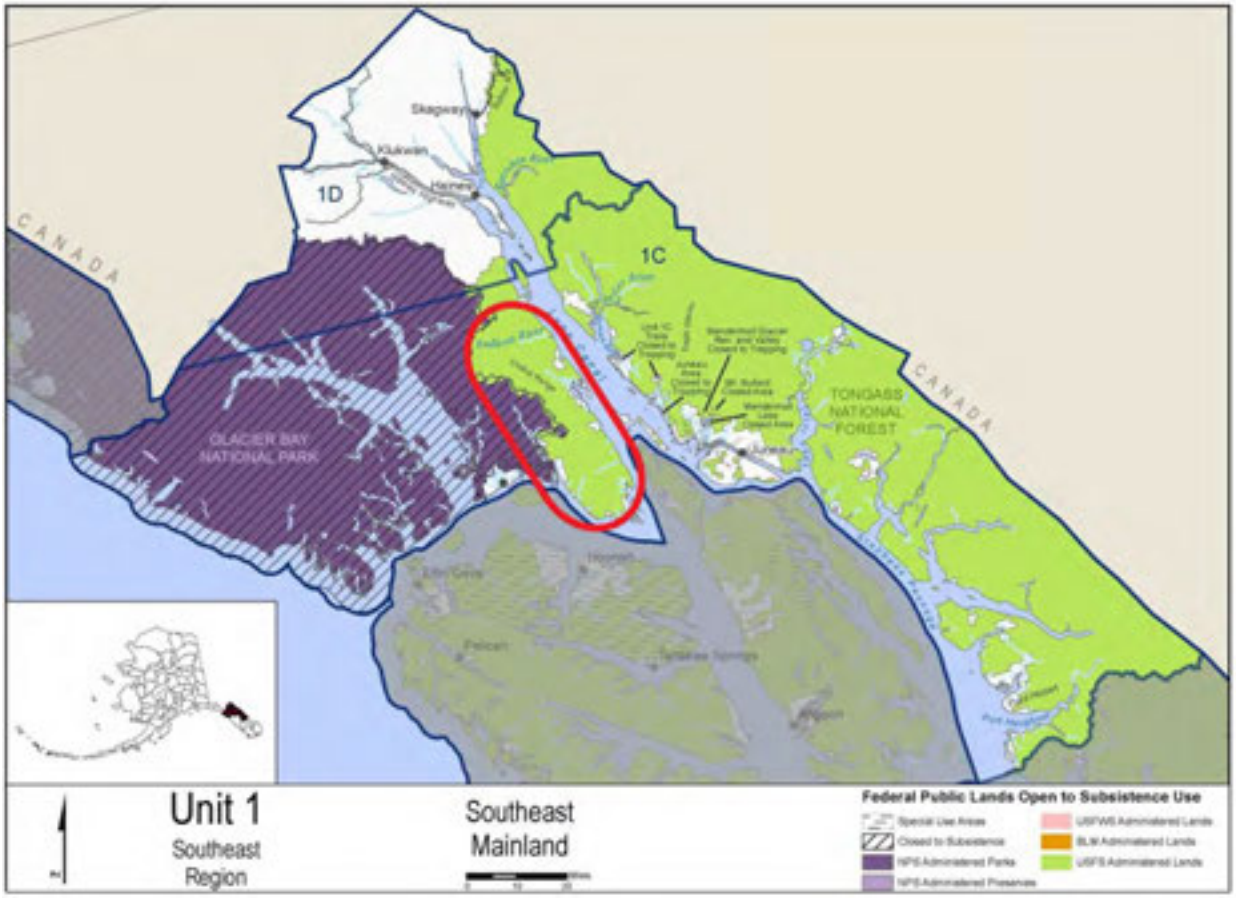

Figure 1. Unit 1C Map with Proposal Analysis Area Encircled in Red.

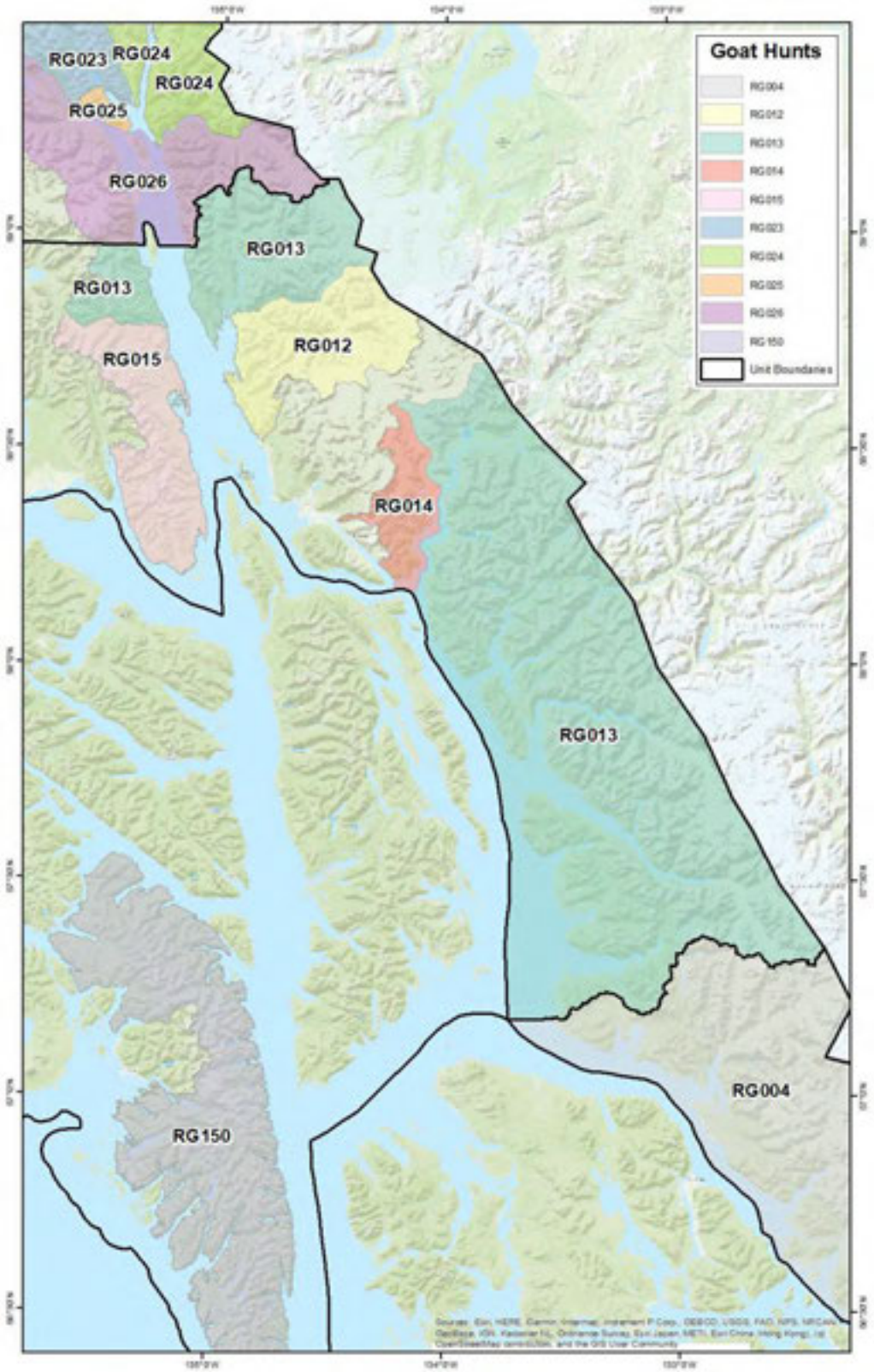

Figure 2. Unit 1C Mountain Goat State Registration Hunt Permit Areas (Churchwell 2021).

Customary and Traditional Use Determination

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

Regulatory History

At the beginning of the Federal Subsistence Management Program in Alaska in 1992, the Federal Subsistence Board (Board) adopted the State's customary and traditional use determination for goats in Unit 1C, which included residents of Haines, Klukwan, and Hoonah (50 FR 22958, May 29, 1992). The Board did not make specific customary and traditional use determinations for goats in Units 1A, 1D, 4, and 5. Therefore, all rural residents were eligible to hunt for goats under Federal regulations in Units 1A, 1D, 4, and 5 at that time. The Board also adopted a customary and traditional use determination of "no Federal subsistence priority" for goats in Unit 1B at this time.

In 1997, proposal P96-06, submitted by the Sitka Tribe of Alaska, was adopted by the Board with modification. This action established a customary and traditional use determination for goats in Unit 4 for the residents of Angoon, Elfin Cove, Funter Bay, Hoonah, Pelican, Port Alexander, Sitka, and Tenakee Springs (FSB 1996: 128). Proposal P97-02c, submitted by Joe Doerr, was also adopted by the Board, establishing a customary and traditional use determination for goats in Unit 1B to include residents of Units 1B and 3 (50 FR 66229, December 17, 1997).

In 1998, the Board adopted proposals P98-07 and P98-08 submitted by the Wrangell and Petersburg Ranger Districts of the Tongass National Forest, respectively (50 FR 35336; June 29, 1998). This action expanded the customary and traditional use determination for goats in Unit 1C to include the residents of Petersburg and Kake.

In 2018, the Board adopted proposal WP18-12, submitted by Calvin Casipit, to add the residents of Gustavus to the customary and traditional use determination for goats in Unit 1C (50 FR 50763, October 9, 2018).

In 2020, the Board adopted proposal WP20-14, submitted by the Southeast Council. This action expanded the customary and traditional use determinations for goats in Units 1, 4, and 5 to include all rural residents of Units 1 – 5. This regulatory change was in keeping with the Southeast Council's recently stated preference to recognize customary and traditional uses of subsistence resources more broadly.

There are currently four different zones within Unit 1C that are covered by three specific Federal seasons for mountain goat harvest. These four zones within Unit 1C correspond to four state permit areas for mountain goat harvest (RG012, RG013, RG014, and RG015). The Federal season in the portion of Unit 1C draining into Lynn Canal and Stephens Passage between Antler River and Eagle Glacier and River (RG012 Permit Area), and all drainages of the Chilkat Range south of the Endicott River (RG015 Permit Area) currently runs from Oct. 1 – Nov. 30. There is currently no Federal season in the portion of Unit 1C draining into Stephens Passage and Taku Inlet between Eagle Glacier and River and Taku Glacier (RG014 Permit Area). The Federal season in Unit 1C Remainder (RG013 Permit Area) currently runs from Aug. 1 – Nov. 30.

Under State regulations, all four registration permit areas in Unit 1C (RG012, RG013, RG014, and RG015) are combined under a single registration hunt permit (RG012), whereby a user may sign up for one registration hunt but hunt all four permitted goat hunting areas (Churchwell 2021).

Current Events

At their January 2023 meeting, the Alaska Board of Game (BOG) adopted Proposal 31 to extend the resident goat season in the southern end of the Chilkat range in Unit 1C from Sept. 1-Nov. 30 to Aug. 1-Nov. 30.

At its fall 2023 meeting, the Southeast Council voted to support WP24-02 with modification to extend the Federal season for goat hunting in the proposal area to run from Jul. 15 – Dec. 31 (SERAC 2023). The Southeast Council also voted to take no action on WP24-03.

Biological Background

Goats in Alaska inhabit alpine areas adjacent to steep cliffs or rocky terrain that provide escape from predators (OSM 2020). They usually graze on grasses, forbs, and low-growing shrubs in high alpine meadows (OSM 2020). As winter approaches, most goats migrate downhill and spend the winter months below tree line or on south-facing cliffs, where they feed on hemlock, grasses, and shrubs (OSM 2020). Others may remain on wind-swept ridges, feeding on mosses and lichens (OSM 2020). Forested habitat near alpine ridges may provide critical winter range, especially during periods of heavy snow accumulation (Shafer et al. 2012).

Security from predators, thermoregulation, snow avoidance, and forage availability have all been identified as important considerations in winter habitat selection by goats in Southeast Alaska (Schoen and Kirchhoff 1982), and South-coastal British Columbia (Taylor et al 2006). Smith (1986) reported that over 85% of all winter relocations of radio-collared goats in three Southeast Alaska goat populations occurred in forested habitat and concluded that the use of forested habitats may be critical to over-winter survival and productivity for mountain goats.

Goats typically occur in small, isolated populations and have little interchange with other populations (OSM 2020). Genetic studies have shown that goats maintain a strong fidelity to discrete ridge systems, indicating very little movement across high elevation habitats (Shafer et al. 2012). Goats breed in November and December and, except during the rut, adult males remain segregated from females and young animals (OSM 2020). The age of first reproduction of goats is more comparable to brown bears than other northern ungulates (Cote et al. 2001). Although there is regional variation, the age of first reproduction for goats is 4.6 years on average (Cote et al. 2001). For comparison, the average age of first reproduction is 4-5 years for brown bears (Schwartz et al. 2003), 3 years for caribou (Adams and Dale 1998), and 2-3 years for moose (Boertje et al. 2007). Females with kids are generally found in small groups, although larger nursery bands may form during early and mid-summer (OSM 2020). Kids remain with their nannies until the next breeding season (OSM 2020). Goat populations often suffer high mortality during severe winters with high total snowfall, which are regularly encountered in high alpine habitat close to cliffs (Hjeljord 1973, Cote and Festa-Bianchet 2003). In these conditions, males typically

exhibit lower survival than females (OSM 2020). Older animals also exhibit lower survival than young, prime-aged goats (OSM 2020). During winter, goats are in a negative energy balance and must rely on fat reserves built up during the summer (OSM 2020). Summer range conditions may also affect goat survival because they are subject to heat stress and may shift to sub-optimal foraging habitats on warm summer days (OSM 2020). Previous studies have also shown that high alpine plants are less nutritious when growing in warmer temperatures (White et al. 2011a).

Goats are generally susceptible to overharvest in localized areas due to their group site fidelity and typically low reproductive rate, as well as the difficulty that hunters can have distinguishing between males and females (Hamel et al. 2006). Predation by wolves can also have a significant impact on goats, especially when they are forced into smaller winter ranges due to logging or development (Hamel et al. 2006). The harvest of even a few females can be unsustainable in these conditions, and hunting mortality can depress goat populations for several years (Hamel et al. 2006).

Goats are also particularly susceptible to disturbance by helicopter overflights that occur during industrial and recreational activities during the summer and winter (Goldstein et al 2005, Cote et al. 2013). Increased recreational activities such as snowmobiling and skiing (Cote et al. 2013) have been shown to increase stress in the winter, which is already the most difficult period for goats (White et al. 2011b). Limiting disturbance during the winter and maintaining a 2,000-meter buffer between goats and helicopter activities was recommended by Cote and colleagues (2013) to minimize adverse impacts. Helicopter overflights during the summer (e.g., ecotourism, transportation flights, biological surveys, development activities), all-terrain vehicles, road construction, and blasting associated with industrial activities, may also be a contributing factor to declines in some goat populations (White et al. 2011b, Cote et al. 2013, St-Louis et al. 2013). More accurate seasonal movement data could be used to help minimize disturbance in critical winter and summer habitats (White et al. 2011b, Herreman 2014).

Limiting factors

Management concerns for mountain goats include late age at first reproduction (Festa-Bianchet and Côte 2008, White and Barten 2008), low kid production, and high susceptibility to harvest (Côte and Festa-Bianchet 2003). Toweill and colleagues (2004) noted that population recovery following herd reduction is slow due to relatively low reproductive rates, high mortality, and low dispersal rates. As a result, hunting mortality can represent a significant addition to natural mortality.

Fox and colleagues (1989) suggested that the quantity and quality of forage is likely a major limiting factor for goats in Southeast Alaska. Severe winters have been associated with declines in several mountain goat populations, including Southeast Alaska (Smith 1976, Wright 1977, Smith 1984). Klein (1953) reported that heavy snow cover may prevent goats from obtaining sufficient forage and may restrict movements to the point of starvation. White and colleagues (2011b) reported that, overall, winter climate exerted the strongest effects on mountain goat survival in coastal Alaska.

Small populations are susceptible to extinction due to environmental variation, demographic stochasticity, and inbreeding (Caughley and Sinclair 1994 *in* Komers and Curman 2000). Varley (1995)

observed limited movements between "island-like" alpine habitats, possibly attributable to a lack of habitat between suitable use areas, and that more isolated subunits usually supported lower population densities. Small populations (i.e., < 75-100 animals) may not be able to sustain any harvest (Hamel et al. 2006) and, at a minimum, harvest can be a key factor affecting population sustainability (Adams 1981, Smith 1988, Voyer et al. 2003).

Global climate change also has the potential to negatively impact cold adapted alpine species including mountain goats (White et al. 2018). Warmer winters in mountainous areas, as influenced by climatic change (Diaz and Bradley 1997), have the potential to affect goat populations. Changes in snowmelt and spring green-up are likely to affect the life histories of ungulates (Rutberg 1987, Kudo 1991 *in* Pettorelli et al. 2007). Furthermore, distributions of pathogens may shift northwards with climatic warming (Mainguy et al. 2007).

General Population Information for Goats in Unit 1C

Goat registration permit hunts currently exist in four different State permit areas (RG012, RG013, RG014, RG015) within Unit 1C (see **Figure 2**). Goat harvests in these areas are managed through a point system that is designed to promote a sustainable yearly harvest of approximately 4-5% of the goat population (Churchwell 2021). Changes in the goat population in Unit 1C are primarily monitored through required hunter harvest reporting and aerial minimum count surveys, which are intended to be conducted in areas of high use at least once every three years (Churchwell 2021). However, specific population-level estimates are not consistently available for many Unit 1C mountain goat populations (Churchwell 2021: 8). Minimum count surveys and reported harvest data, therefore, provide the basis for mountain goat management in Unit 1C since individual registration hunts are closed when a certain number of animals are taken from a hunt area (Churchwell 2021). Work on a sightability model to be used in conjunction with aerial surveys as a method to calculate goat population estimates in specific areas is ongoing (White and Pendleton 2013, Churchwell 2021).

Aerial surveys were used to document goat declines in the Juneau area in 1970s and 1980s, particularly along the road system (Churchwell 2021). A severe winter in 1984-1985 also led to population declines in the Chilkat Range and along the east side of Lynn Canal (Churchwell 2021). Goat populations recovered and were stable by the late 1980s, however (Johnson 1988, Churchwell 2021). Goat populations were also healthy and stable through the early 2000s, until another severe winter storm in the 2006-2007 season caused substantial population declines in the Lynn Canal area (Churchwell 2021).

Survey data on mountain goat populations in the RG015 Permit Area (i.e., "the proposal area") has not been collected in the last ten years due to funding constraints, generally low harvest patterns in this area, and greater management priorities in other areas (Churchwell 2023). Poor weather conditions have also prevented many surveys from being conducted in this part of the southeast region for the last three years (Churchwell 2023). The most recent survey data for the proposal area is summarized in **Table 1** below. This survey data shows an increasing total number of goats over time (**Table 1**). However, the most recently published survey information for the Chilkat Range dates back to 2011 (**Table 1**). In general, the RG012/Antler River to Taku Glacier permit area has been more heavily utilized than the proposal

area (RG015), because it is closer to the Juneau road-system and provides easier access to goat habitat (Churchwell 2021).

Table 1. Mountain Goat Survey Results from the Chilkat Range Area, 2000-2017 (Churchwell 2021)

Year	Number of Adults	Number of Kids	Total Goats	Kids:100 Goats	Percent Kids
2000	143	30	173	21	17%
2002	152	26	178	17	15%
2006	203	33	236	16	14%
2011	223	44	267	20	16%

During the last thirty years there have been three major economic development patterns and practices that have impacted goat populations in Unit 1C: (1) An increase in guided goat hunting; (2) Increased mining and other resource development processes in Berners Bay and areas near Juneau; and (3) The growth of tourism based on helicopter flights to glaciers and remote skiing locations (Robus 1996, Churchwell 2021). However, mining and helicopter-based tourism have not been significant issues in the proposal area (Churchwell 2023).

Guided hunts increased steadily through the early 2000s, with accompanying increases in goat harvests and harvest success rates in Unit 1C (Churchwell 2021). The US Forest Service began limiting the number of clients that guides could take out through commercial services permits in 2002, which helped to stabilize overall harvest levels within Unit 1C at 30-50 goats per year (Barten 2004, Churchwell 2021, Scott 2012). There are currently two guided hunts available specifically within the proposal area (Churchwell 2023).

Cultural Knowledge and Traditional Practices

The rural area of the Southeast Region is comprised of about 33 small-to-medium-sized communities, ranging in population from 20 or less (Point Baker, Elfin Cove, and Game Creek) to over 8,000 (Sitka). Many of these communities were originally established by Tlingit, Haida (Hydaburg and Kasaan), or Tsimshian (Metlakatla) groups, and are situated at historical village sites. Population growth in the Southeast Region during the historical period (beginning about 1750) has been affected by several waves of in-migration – first by Russian fur traders who established Sitka as their headquarters in the late 1700s (OSM 2020). After the sale of Alaska to the United States in 1867, new industries such as commercial fishing, fish processing, mining, and commercial trade were pursued with the associated influx of migrants (Worl 1990, George and Bosworth 1988, Smythe 1988).

Beginning in the 1970s, logging camps sprang up and some have persisted as new communities, such as Game Creek and Thorne Bay (OSM 2020). Many rural communities in the Southeast Region have at their core a *kwaan* or Alaskan Native tribe. The indigenous territories mapped in 1947 by Goldschmidt and Haas covered all of the Southeast Region (Goldschmidt and Haas 1998). Unit 1C is located primarily within the boundaries of the traditional lands used by the Auke Bay Tribe (*Aak'w* Kwaan), the Taku Tribe (*T'aa ku* Kwaan), and the Hoonah Tribe (*Xunaa* Kwaan; ANKN 2017). The Kake Tribe

(*Keex*' Kwaan) also had permanent and seasonal settlements in the southern portion of what is now Unit 1C (Firman and Bosworth 1990). The use of mountain goat in Unit 1C by these groups is well documented in ethnographic literature (see ADF&G 1992). The Hoonah Tlingit harvested goat historically in Glacier Bay and Dundas Bay (Goldschmidt and Haas 1946), and near Excursion Inlet (Schroeder and Kookesh 1990).

Since 1960, the overall rural population of the Southeast Region has almost doubled, from 13,102 people in 1960, to 25,085 people in 2020 (see **Table 2**). Much of this growth has been concentrated in the larger rural communities like Haines, Petersburg, and Sitka. Some of this population growth has come from new communities established as a result of logging activities (Cerveny 2005). The development of recreation and tourism industries in the area has also resulted in population growth (Cerveny 2005). However, many of the smaller rural communities in this region have seen a decline in their populations since the 1990s, resulting primarily from downturns in commercial fishing industries and associated economic opportunities in this region (Sill and Koster 2017). Today, the majority of all residents in Unit 1C are non-federally qualified users (Churchwell 2021), due to the disproportionate population of Juneau.

Overall, the residents of rural Southeast Alaska have used mountain goats continuously throughout recorded history, wherever goat has been found (OSM 2020). The mountain goat, found in rocky terrain from the Gulf of Alaska to the Cascade Range of Washington State, have been an important resource for the Tlingit, Tsimshian, and Haida groups of Southeast Alaska (de Laguna 1990). Archaeological evidence obtained from the Prince William Sound area suggests that mountain goat "seems to have played a fairly important part in the diet of those who lived or came near the areas where it could be obtained" (de Laguna 1972).

The Tlingit historically exhibited a pattern of hunting mountain goats in the fall, early winter, and spring. Hunts regularly took place in the mountainous areas during the fall and early winter, when goats are typically at their fattest (OSM 1998). Temporary camps were utilized, and berries picked and preserved while smoking fish and processing goat meat. Oberg's (1973) sources indicated that any meat to be stored was hunted and dried in August. Goats were hunted in timbered areas in the spring when snow pushed goats into the treeline (OSM 2020). Goat fleece was also collected from brush and branches for use in weaving ceremonial blankets in the spring (OSM 2020). Starting in the mid-nineteenth century, some Tlingit groups would go directly from the salmon streams to hunt mountain goat, deer, and bear (Goldschmidt and Haas 1946, de Laguna 1990).

The people of southeast Alaska have also employed a variety of means of handling, preparing, preserving, and storing various parts of mountain goats, which have been traditionally used by past generations (OSM 2020). Mountain goats have been used by the indigenous peoples of the region as a source of food, clothing, tools, and fat/grease (OSM 2020). Goat horns, skins, and fleece were common trade items among the Tlingit (OSM 2020). The horns were used to make spoons, personal ornaments, boxes for storing powder and shot, tool handles, and feast dishes (OSM 2020). Goat skin was thought to make the best drumheads (Emmons 1991; de Laguna 1990). Goat wool is used to weave ceremonial blankets, each blanket requiring the wool of approximately three goats and taking up to a year to

complete (OSM 2020). These blankets were found among the Tlingit, Haida, and Tsimshian (OSM 2020). According to Tlingit tradition, the blankets originated with the Tsimshian and were carried to other groups by intermarriage or migration (Emmons 1991). The wool of the goat was also used for bedding, twisted into cordage, and used for decorations like ear ornaments (OSM 2020). The fat of the goat was melted and formed into cakes (OSM 2020). The fat from these cakes was used in food and to grease the face before blackening or painting (Emmons 1991). Traditionally, the meat was dried or boiled and preserved in oil (Goldschmidt and Haas 1946). If killed in the mountains, the goat was usually butchered, and the meat dried on site to make it easier to pack out (de Laguna 1990).

Goat hunting knowledge, skills, values, and lore were traditionally passed down to young men by their maternal uncles (OSM 2020). In many communities, favored goat hunting areas could not be shown to newcomers without kinship ties until they became established as a resident (OSM 2020). Young women are traditionally taught how to weave ceremonial Chilkat blankets, made from goat hair, by their mother or maternal grandmother (OSM 2020). These blankets and other items made from goat horns, fleece, and skin have been used as important ceremonial regalia (OSM 2020). Blanket wearing is still taught and practiced among Tlingit groups (OSM 1998).

To reach goat hunting areas, Tlingit hunters had to climb high into the mountains (Krause 1956). These areas were approached by canoe, with hunting taking place from the heads of rivers and lakes adjacent to steep mountains (Oberg 1973). Traditionally, Tlingit groups used bow and arrow or spears to hunt goat (OSM 1998). Trained dogs were used to drive goats down into canyons where hunters waited to spear them (de Laguna 1990). Contemporary hunters use firearms for goat hunting, and boats or airplanes to reach goat hunting areas (ADF&G 2017a).

Both past and present harvest of goat in southeast Alaska is demonstrative of a pattern of use in which the harvest is shared within a community (OSM 2020). In Tlingit tradition, the meat of a boy's first kill is divided up and distributed, with the belief that this act of sharing would bring the boy luck in his future hunting efforts (OSM 2020). This tradition is still in practice (de Laguna 1972). Goat meat continues to be shared and traded within and among the communities of Kake and Petersburg, as well as other communities which have used Unit 1C to harvest goat (OSM 1998). Goat remains part of the broad range of subsistence resources utilized by rural Southeast Alaskan communities, which provide substantial cultural, economic, social, and nutritional benefits to these communities (OSM 2020).

Table 2. The Population of Rural Communities in the Southeast Region from 1960 to 2020 (Sources: ADLWD 2020, ADCCED 2017, and U.S. Bureau of the Census 1995).

Community	1960	1970	1980	1990	2000	2010	2020
Angoon	395	400	465	638	572	459	357
Coffman Cove	0	0	193	186	199	176	127
Craig	273	272	527	1,260	1,397	1,201	1,036
Edna Bay	135	112	6	86	49	42	25
Elfin Cove	0	49	28	57	32	20	24
Game Creek	0	0	0	61	35	18	23
Gustavus	107	64	98	258	429	442	655
Haines Borough	1,000	1,504	1,680	2,117	2,392	2,508	2,080
Hollis	0	0	0	111	139	112	65
Hoonah	686	748	680	795	860	760	931
Hydaburg	251	214	298	384	382	376	380
Hyder	32	49	77	99	97	87	48
Kake	455	448	555	700	710	557	543
Kasaan	36	30	25	54	39	49	30
Klawock	251	213	318	722	854	755	720
Klukwan	112	103	135	129	139	95	87
Kupreanof	26	36	47	23	23	27	15
Metlakatla	1,135	1,245	1,333	1,464	1,375	1,405	1,454
Naukati Bay	0	0	0	93	135	113	142
Pelican	135	133	180	222	163	88	98
Petersburg Borough	1,502	2,042	2,821	3,207	3,224	2,948	3,398
Point Baker	0	80	90	39	35	15	12
Port Alexander	18	36	86	119	81	52	78
Community	**1960**	**1970**	**1980**	**1990**	**2000**	**2010**	**2020**
Port Protection	0	0	40	62	63	48	36
Saxman	153	135	273	369	431	411	384
Sitka Borough	3,237	6,109	7,803	8,588	8,835	8,881	8,458
Skagway	659	675	814	692	862	920	410
Tenakee Springs	109	86	138	94	104	131	116
Thorne Bay	0	443	377	569	557	471	476
Whale Pass	0	0	90	75	58	31	86
Whitestone Camp	0	0	NA	164	116	17	2
Wrangell Borough	2,165	2,358	2,658	2,479	2,448	2,369	2,127
Yakutat Borough	230	190	449	534	808	662	662
Total	**13,102**	**17,774**	**22,284**	**26,450**	**27,643**	**26,246**	**25,085**

Harvest History

General Harvest History Throughout Unit 1C

Mountain goats are hunted in Unit 1C "both for meat and as a trophy animals by resident and nonresident hunters" (Churchwell 2021: 2). The average reported yearly mountain goat harvest for all users throughout Unit 1C was 43 for the most recently published five-year reporting period between 2013 and 2017 (Churchwell 2021). This yearly average was higher than the 36 goat per year average reported for the previous five-year reporting period between 2008 and 2012 (Churchwell 2021). The average annual number of goat hunters throughout Unit 1C also increased during the most recently published five-year reporting period between 2013 and 2017 (~ 49 resident hunters and 30 non-resident hunters per year), compared to the previous reporting period (~ 39 resident hunters and 27 non-resident hunters per year) (Churchwell 2021). The overall success rate of non-resident hunters has been substantially higher than that of resident hunters in Unit 1C in recent years, possibly because non-resident hunters are required to hire a hunting guide or hunt with a resident Alaskan relative (see **Table 3**). In general, most harvest in Unit 1C takes place in November (51%), which is in part because the bulk of guided harvest occurs during this month (Churchwell 2021: 17). The monthly percentage of harvest within Unit 1C typically increased across the season during the 2013 – 2017 reporting period, with about 8% of the harvest taking place in August, 9% in September, 31% in October, and 51% in November (Churchwell 2021). This general harvest pattern occurs because snow often drives goats down from higher elevations as the season progresses, and they become easier to access (Churchwell 2021). "This is the main reason that guides focus their efforts later in the season" (Churchwell 2021: 17). **Table 3** shows that, on average, about 14 more Unit 1C residents reported hunting goats each year from 2008-2017 than non-residents. However, the average reported hunting success rate of non-residents was approximately 59% higher than that of Unit 1C residents (**Table 3**). The average success rate of Other Alaskan residents hunting in Unit 1C was similar to that of Unit residents (**Table 3**). However, the number of Other Alaskan residents hunting in Unit 1C, and their rate of success, was more variable from year-to-year than Unit residents (**Table 3**).

During the 2008-2017 period, 60% of all reported goat harvests in Unit 1C took place in the southeastern zone of the RG013 permit area (specifically Wildlife Analysis Areas 2824 and 2825) (Churchwell 2021). These locations are outside the proposal area (RG015 permit area). Goat harvests in Wildlife Analysis Area (WAA) 2517 around Juneau have also grown recently with the increasing popularity of archery hunting (Churchwell 2021). Churchwell (2021) notes that other popular areas for mountain goat hunting in Unit 1C include Berners Bay (WAA 2409) and the Upper Taku River Drainage (WAA 2518). The most popular location for goat hunting within the proposal area is the Homeshore Area of the Chilkat Peninsula in WAA 2306 (Churchwell 2021). WAA 2306 is located in the southwestern portion of the RG015 permit area, in closest proximity to Gustavus and Hoonah, where residents have a substantial history of engaging in goat hunting (OSM 1998, OSM 2020). The Homeshore area includes the Couverden dock and road system cited by the proponents of WP24-03 as both an important access area and the site of competition with non-federally qualified users.

Boating was the most commonly reported transportation method used to reach goat hunting locations throughout Unit 1C from 2013 to 2017 (Churchwell 2021). Eighty percent of hunters reported using boats for their hunts, while ten percent reported using aircraft, and six percent reported highway vehicle use (Churchwell 2021). The use of commercial services (~ 31 hunters per year), registered hunting guides (27 hunters per year), and transporters (3 hunters per year) throughout Unit 1C was stable during this reporting period (Churchwell 2021). However, as the Southeast Council member from Gustavus explained, the primary use of boats to reach favored hunting locations in the proposal area can lead to issues of user conflict and competition for access in narrow embayments and places with limited spots for safe anchorage:

> The area that's in question here is an old timber sale I think from back in the '70s or something? There's lots of logging roads back up there that get pretty high up close to alpine. There is at the old log transfer facility, the dock that was there is no longer there. It got blown out by a storm a few years ago. They've modified that dock area so that there's a ramp going down into the water now so people can bring their boats right up…and unload their four-wheelers and they have this huge road system to drive on and chase animals around on. That particular little anchorage there, right at the log transfer facility is not a very good place to keep a boat. When the southwesterly blows up it gets rolling in there, so there's not a whole lot of places to keep boats to begin with…There's probably only a spot there for maybe three or four boats and every other place you anchor, you don't want to put your boat there. It's a very small area where you can keep a boat and not worry about it getting blown off anchor and on to shore. So that's an issue. You know there's just a limited amount of where you can bring your boat to even start hunting. And then beyond that you get on these logging roads and the idea is you want to use those roads to get as high up and close to alpine as you can, and there are some roads that get pretty darn close. I mean it's a pretty easy walk up to alpine. The problem is that people set up camps and, you know, block the roads and so you're not able to get above those areas and access the best areas to go up and find the goats. And this also happens during the moose season. So, there's a period from…September 1 to the end of the moose season, to past the moose season with lots of people with boats anchored there – people up on the road system blocking the best roads up to alpine. So, there's a bunch of people there running around (SERAC 2023: 327-328).

Though a percentage of the yearly harvest quota for goats throughout Unit 1C is reserved for federally qualified subsistence users, there is currently no time-period where federally qualified subsistence users are permitted to hunt without potential competition from non-federally qualified users in the area covered by this proposal. The Federal season in the proposal area currently runs from Oct. 1 – Nov. 30, while the State resident season in the proposal area was recently extended to run from Aug. 1 – Nov. 30. Both non-federally qualified users and federally qualified subsistence users may obtain a permit to hunt during the State season.

Table 3. Mountain Goat Hunter Residency and Success in Unit 1C, 2008-2017 (calculated from Churchwell 2021).

	Total Hunters			Percent Successful		
	Unit Residents	Other AK Residents	Non-Residents	Unit Residents	Other AK Residents	Non-Residents
2008	54	8	31	26%	0%	90%
2009	41	10	23	27%	10%	78%
2010	35	10	29	23%	60%	93%
2011	33	13	26	21%	38%	81%
2012	30	2	28	23%	0%	89%
2013	43	9	30	33%	44%	90%
2014	47	7	31	28%	14%	84%
2015	33	1	30	33%	0%	90%
2016	64	9	31	34%	44%	94%
2017	46	5	30	28%	60%	77%
Total	426	74	289			
Average	43	7	29	28%	32%	87%

Harvest History Specifically in the Proposal Area (RG015 Permit Area)

The differences in reported harvests and success rates for federally qualified subsistence users (FQSUs), non-federally qualified users (NFQUs), and non-residents were not as substantial when looking specifically at the proposal area from 2003-2022 (see **Table 4**). Because of issues of timing and accessibility, the proposal area has generally not been as popular of a goat hunting location as some of the other Unit 1C areas mentioned earlier in the analysis (see Churchwell 2021). Stormy weather and poor anchorage tends to restrict accessibility to the proposal area during the latter months of the season when snow typically drives goats down to lower, more easily reachable locations (SERAC 2023, AK BOG 2023). Therefore, much of the goat hunting that takes place in the proposal area tends to occur at higher elevations, earlier in the season (SERAC 2023, AK BOG 2023). There are currently only two guided hunts available in this area (Churchwell 2023). As the Southeast Council member from Gustavus explained, "hunting [goats in the proposal area] in August is easier. There's better weather. You don't have to worry about storms as much…So, we thought that that seemed like a reasonable thing to do [extend the season into August] to maintain a meaningful [subsistence] priority" (SERAC 2023: 48). Similarly, the proponents of BOG Proposal 31 also noted this issue as part of their justification for extending the state resident season in the proposal area:

> The resident goat season for the southern area of the Chilkat Range doesn't start until September 1st, which is when storms frequent the area, making access from the coast and hunting much more difficult. According to ADF&G information, over the past five years

> there were three to nine goats harvested off of the entire Chilkat Peninsula, with very few nannies taken. Goats have increased on the Chilkat Peninsula from the lows of the past, and the current harvest quota is not being met. So, we see no reason to continue the later season opener for the southern part of the Chilkat Range (AK BOG 2023: 27-28).

This issue of weather and accessibility restricting goat hunting opportunities later in the season could be heightening issues of competition and user conflict earlier in the season in an area with limited points of anchorage. It may also generally limit the use of the proposal area for goat hunting for all user types. Though hunting effort and harvests did vary from year-to-year, an average of approximately 3.5 federally qualified subsistence users and 7.3 non-federally qualified users reported hunting each year in the proposal area from 2003-2022 (see **Table 4**). Reported hunting effort and harvest in the proposal area by non-residents was minimal (**Table 4**). Federally qualified subsistence users reported harvesting an average of about 1 goat per year, non-federally qualified users harvested an average of approximately 2 goats per year, and non-residents harvested less than 1 goat per year in the proposal area during this time (**Table 4**). Federally qualified subsistence users and non-federally qualified users both reported average success rates of about 28%, while non-residents reported an average success rate of approximately 50% during the years in which they hunted in the proposal area (**Table 4**). On average, federally qualified subsistence users and non-federally qualified users reported hunting for about 10 days to harvest 1 goat, while non-residents reported hunting about 9 days to harvest one goat in the proposal area (**Table 4**).

The highest number of federally qualified subsistence users hunting goats in the proposal area from 2003 to 2022 came from Hoonah, Gustavus, and Sitka (see **Table 5**). Over 80% of the non-federally qualified users hunting in the proposal area during this time came from Juneau. Juneau hunters outnumbered federally qualified subsistence users in the proposal area at a rate of just over 2:1 (**Table 5**). Similarly, Juneau hunters harvested approximately 46% more goats than federally qualified subsistence users hunting in the proposal area during this time (**Table 5**). Still, the reported hunting effort and harvest statistics for all user groups hunting in the proposal area during this time was relatively low (**Table 5**).

Table 4. Reported Mountain Goat Hunting Effort and Harvest in the Proposal Area by Federally Qualified Subsistence Users (FQSUs), Non-Federally Qualified Users (NFQUs), and Non-Residents from 2003-2022 (Churchwell 2023).

	Number of Hunters			Days Hunted			Goats Harvested		
Year	FQSU	NFQU	Non-resident	FQSU	NFQU	Non-resident	FQSU	NFQU	Non-resident
2003	7	8	0	21	22	0	1	0	0
2004	1	4	0	1	5	0	0	2	0
2005	0	2	0	0	5	0	0	0	0
2006	5	6	0	7	13	0	3	3	0
2007	3	7	0	3	18	0	0	1	0
2008	3	5	0	9	10	0	0	1	0
2009	8	4	0	23	5	0	0	1	0
2010	7	2	1	24	3	1	3	2	1
2011	7	6	1	19	35	5	1	0	0
2012	0	9	0	0	28	0	0	2	0
2013	7	14	0	18	87	0	2	3	0
2014	5	3	0	8	19	0	3	1	0
2015	3	5	0	12	11	0	1	1	0
2016	4	20	0	6	35	0	2	7	0
2017	1	8	1	3	14	4	0	4	0
2018	5	11	2	24	25	14	1	2	1
2019	0	10	0	0	13	0	0	3	0
2020	2	7	2	4	16	10	1	2	2
2021	0	6	0	0	13	0	0	2	0
2022	1	8	1	1	13	3	1	4	0
Total	69	145	8	183	390	37	19	41	4
Average	3.5	7.3	0.4	9.2	19.5	1.9	1.0	2.1	0.2

Table 5. Reported Mountain Goat Hunting Effort and Harvest within the Proposal Area by Community of Residence, 2003-2022 (Churchwell 2023).

Residence community	Number of Hunters	Days Hunted	Goats Harvested
Federally Qualified			
ANGOON	1	1	1
EXCURSION INLET	2	2	0
GAME CREEK	1	3	0
GUSTAVUS	20	59	8
HOONAH	33	88	3
NAUKATI BAY	1	1	0
SITKA	9	27	5
SKAGWAY	2	2	2
Total FQSU	**69**	**183**	**19**
FQSU per Year Average	**3.5**	**9.2**	**1.2**

Non-Federally Qualified	Number of Hunters	Days Hunted	Goats Harvested
ANCHORAGE	3	10	0
AUKE BAY	8	18	1
DOUGLAS	4	6	3
JUNEAU	124	345	35
SHUNGNAK	1	1	0
WASILLA	4	8	1
WILLOW	1	2	1
Total NFQU	**145**	**390**	**41**
Average NFQU	**7.3**	**19.5**	**2.1**
NON-RESIDENT Total	**8**	**37**	**4**
NON-RESIDENT Average	**0.4**	**1.9**	**0.7**

Other Alternatives Considered

Modify the period or area of season change/closure: It is not possible to reduce the area of the proposed season change/closure without creating a new permit area. However, it may be worth considering a modification of the period of the proposed season change/closure that would provide for a more meaningful subsistence preference, while limiting impact on non-federally qualified users.

Increase the goat quota reserved for harvest by federally qualified subsistence users: Increasing the goat quota reserved for federally qualified subsistence users in Unit 1C would enhance the Federal subsistence priority in this area.

Effects of the Proposal

If the Board adopts WP24-02, it will extend the Federal subsistence season for mountain goats in Unit 1C on Federal public lands within the drainages of the Chilkat Range south of the south bank of the Endicott River (RG015 Permit Area) to run from Jul. 24 – Dec. 31. This change would provide federally qualified subsistence users in the area with greater harvest opportunity, by extending the length of the Federal subsistence season here and providing two windows where user competition for goats and conflicts over access to favored goat hunting locations should be reduced. If the Board were to adopt this proposal, only federally qualified subsistence users would be able to hunt from July 24-31 and December 1-31. The registration permit hunt system should continue to minimize any potential conservation concerns associated with extending the Federal subsistence season in this way.

If the Board adopts WP24-03, it will extend the Federal subsistence season for mountain goats in Unit 1C on Federal public lands within the drainages of the Chilkat Range south of the south bank of the Endicott River (RG015 Permit Area) to run from Aug. – Nov. 30. WP24-03 would also close goat hunting to non-federally qualified users within this area from Aug. 1 – 31. However, under §815(3) of ANILCA, adopting WP24-03 would require substantial evidence of a conservation concern and/or competition and user conflict threatening the continuation of subsistence in this area.

OSM CONCLUSION

Support WP24-02 with **modification** to extend the season in the proposal area to Jul. 15 – Dec. 31.

Oppose WP24-03

The modified regulations should read:

Unit 1C – Goat

Unit 1C, drainages of the Chilkat Range south of the south bank of the Endicott River—1 goat by State registration permit only	***July 15-Dec. 31***
Unit 1C, that portion draining into Lynn Canal and Stephens Passage between Antler River and Eagle Glacier and River, ~~and all drainages of the Chilkat Range south of the Endicott River~~ – 1 goat by State registration permit only	*Oct. 1-Nov. 30.*

Justification

Extending the Federal season for mountain goats on the Federal public lands of Unit 1C within the drainages of the Chilkat Range south of the south bank of the Endicott River (RG015 Permit Area) to Jul. 15 – Dec. 31 would provide for a more meaningful preference for federally qualified subsistence users in this area. The Federal subsistence season in this area is currently only open from Oct. 1 – Nov.

30, while the State resident season in the same area was recently extended to Aug. 1 – Nov. 30. The OSM modified version of WP24-02 would provide federally qualified subsistence users with an extended season to harvest goats from the proposal area, as well as two windows to hunt goats without potential competition from non-federally qualified users, from Jul. 15-31 and Dec. 1-31. Extending the preferential opening to federally qualified subsistence users further into the month of July may be particularly beneficial considering the difficulties posed by stormy weather conditions in the proposal area later in the season. Adopting the OSM modified version of WP24-02 would also provide a more meaningful subsistence preference without enacting a closure to non-federally qualified users during any period of the current State season.

Based on the data available, WP24-03 does not appear to meet the requirements for closure to non-federally qualified users as noted under §815(3) of ANILCA. Current information does not appear to suggest that there is a significant conservation concern or threat to the continuation of subsistence uses of mountain goats that would necessitate a closure to goat harvest by non-federally qualified users in the proposal area.

LITERATURE CITED

Adams, L. G. 1981. Ecology and population dynamics of mountain goats, sheep mountain-gladstone ridge, Colorado. M.S. Thesis, Colorado State University. Fort Collins, CO. 189 pp.

Adams, L. G. and B.W. Dale. 1998. Reproductive performance of female Alaskan Caribou. Journal of Wildlife Management 65:1184-1195.

ADCCED. 2017. Community and Regional Affairs, Community Index. https://www.commerce.alaska.gov/dcra/DCRAExternal/community, retrieved June 19, 2017. Alaska Department of Commerce, Community, and Economic Development. Juneau, AK.

ADF&G. 2019a. WinfoNet. https://winfonet.alaska.gov/. Retrieved May 30, 2019. Juneau, AK.

ADF&G. 2019b. Community subsistence information system. Online database http://www.adfg.alaska.gov/sb/CSIS/. Division of Subsistence. Retrieved May 30, 2019. Anchorage, AK.

ADLWD. 2017. Research and Analysis, Population and Census, Historical Data: Boroughs/Census Areas. Juneau, AK. http://live.laborstats.alaska.gov/pop/index.cfm, retrieved June 19, 2017. Alaska Department of Labor and Workforce Development, Anchorage, AK.

Alaska Board of Game (AK BOG) 2023. Alaska Board of Game Southeast Region Meeting Agenda. Meeting held January 20 – 24, Ketchikan, AK. https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook. Retrieved: July 13, 2023.

Barten, N. 2004. Unit 1C mountain goat management report. Pages 38–48 [*In*] C. Brown, editor. Mountain goat management report of survey and inventory activities 1 July 2001–30 June 2003. Alaska Department of Fish and Game, Division of Wildlife Conservation, Federal Aid in Wildlife Restoration Project 12.0. Juneau.

Boertje, R. D., K.A. Kellie, C.T. Seaton, M.A. Keech, D.D.Young, B.D. Dale, L.G. Adams, and A.R. Alderman. 2007. Ranking Alaska Moose Nutrition: Signals to Begin Liberal Antlerless Harvests. Journal of Wildlife Management 71:1494-1506.

Churchwell, Roy. 2023. Juneau/Douglas Area Biologist. Personal Communication: email and phone. ADF&G Division of Wildlife Conservation. Juneau, AK.

Churchwell, R. 2021. Mountain Goat Management Report and Plan, Game Management Unit 1C: Report Period 1 July 2013-30 June 2018, and Plan Period 1 July 2018-30 June 2023. ADF&G Division of Wildlife Conservation. Species Management Report and Plan ADF&G/DWC/SMR&P-2021-7. Juneau, AK.

Cohen, K.A. 1989. Wrangell Harvest Study: A Comprehensive Study of Wild Resource Harvest and Use by Wrangell Residents. ADF&G Division of Subsistence Technical Paper No. 165.

Cote, S.D., M. Festa-Bianchet, and K.G. Smith. 2001. Compensatory reproduction in harvested goat populations: a word of caution. Wildlife Society Bulletin 29:726-730.

Cote, S.D. and M. Festa-Bianchet. 2003. Goat. Pages 1061-1075 *in* G.A. Feldhamer, B.C. Thompson, and J.A. Chapman, eds. Wild Mammals of North America: biology, management, and conservation. Second edition. John Hopkins University Press, London.

Cote, S.D., S. Hamel, A. St-Louis, and J. Mainguy. 2013. Do goats habituate to helicopter disturbance? Journal of Wildlife Management, 77:1244-1248.

de Laguna, F. 1972. Under Mount Saint Elias: the History and Culture of the Yakutat Tlingit. Smithsonian Institution Press, Washington, D.C.

de Laguna, F. 1990. Tlingit *in* Handbook of North American Indians. Volume 7, Northwest Coast. W. Suttles volume editor. Smithsonian Institution Press, Washington, D.C.

Diaz, H. F., and R. S. Bradley. 1997. Temperature variations during the last century at high elevation sites. Climate Change 36:253-279.

Emmons, G.T. 1991. The Tlingit Indians. F. de Laguna, ed. University of Washington Press, Seattle, WA.

Festa-Bianchet, M. and S. D. Côte. 2008. Mountain goat: Ecology, behavior and conservation of an alpine ungulate. Island Press, Washington, D.C. 265 pp.

Fox, J. L. 1983. Constraints on winter habitat selection by the Mountain goat (*Oreamnos americanus*) in Alaska. Ph.d. Diss., University of Washington. Seattle, WA. 156 pp.

Fox, J. L., C. A. Smith, and J. W. Schoen. 1989. Relation between mountain goats and their habitat in Southeastern Alaska. U.S.D.A. Forest Service General Technical Report PNW-GTR-246. 26 pp.

FSB. 1996. Transcripts of the Federal Subsistence Board proceedings, May 2, 1996 in Anchorage, AK. Office of Subsistence Management, FWS. Anchorage, AK. Vol. IV. 159 pp.

FSB. 1998. Transcripts of the Federal Subsistence Board proceedings, May 6, 1998 in Anchorage, AK. Office of Subsistence Management, FWS. Anchorage, AK. Vol. III. 96 pp.

George, G.D., and R.G. Bosworth. 1988. Use of fish and wildlife by residents of Angoon. Admiralty Island, Alaska. ADF&G, Division of Subsistence Technical Paper No. 159. Juneau.

Goldschmidt W., and T. Haas. 1946. Possessory Rights of the Natives of Southeastern Alaska. Unpublished report. Washington, D.C.: Commissioner of Indian Affairs.

Goldschmidt, W.R., and T. Haas. 1998. *Haa Aani*: Our Land. Tlingit and Haida land rights and use. University of Washington Press, Seattle and London and Sealaska Heritage Foundation, Juneau, AK. 219 pages.

Goldstein, M.I., A.J. Poe, E. Cooper, D. Youkey, B.A. Brown, and T.L.McDonald. 2005. Goat response to helicopter overflights in Alaska. Wildlife Society Bulletin, 33(2): 688-699.

Hamel, S., S.D. Cote, K.G. Smith, and M.Festa-Bianchet. 2006. Population dynamics and harvest potential of goat herds in Alberta. Journal of Wildlife Management, 70:1044-1053.

Hebert, D. M., and W. G. Turnbull. 1977. A description of southern interior and coastal mountain goat ecotypes in British Columbia. Proceedings of the First International Goat Symposium:126-146.

Hjeljord, O. 1973. Goat forage and habitat preference in Alaska. Journal of Wildlife Management, 37(3): 353-362.

Hurley, K. 2004. Northern Wild Sheep and Goat Council position statement on helicopter supported recreation and mountain goats. Pages 131–136 [*In*] W. Heimer, D. Toweill, and K. Hurley, editors. Proceedings of the 14th biennial symposium of the Northern Wild Sheep and Goat Council, 15–22 May 2004, Alaska's Inside Passage. Johnson, D. M., editor. 1988. Mountain goat management workshop report. Alaska Department of Fish and Game, Division of Wildlife Conservation, Douglas.

Klein, D. R. 1953. A reconnaissance study of the mountain goat in Alaska. Ph.d. Diss., University of Alaska. Fairbanks, AK. 121 pp.

Komers, P., and G. P. Curman. 2000. The effect of demographic characteristics on the success of ungulate reintroductions. Biological Conservation 93:187-193.

Krause, A. 1956 [1885]. The Tlingit Indians. University of Washington Press, Seattle, WA.

Mainguy, J., K. Worley, S. D. Côte, and D. W. Coltman. 2007. Low MHC DRB class II diversity in the mountain goat: past bottlenecks and possible role of pathogens and parasites. Conserv. Genet. 8:885-891.

Oberg, K. 1973. The Social Economy of the Tlingit Indians. University of Washington Press, Seattle, WA.

OSM. 1998. Staff analysis WP07-07/08. Pages 76-92 *in* Federal Subsistence Board Meeting Materials. Office of Subsistence Management, USFWS. Anchorage, AK.

OSM 2020. Staff Analysis WP20-14. Pages 227-246 *in* Federal Subsistence Board Meeting Materials. April 20-23, 2020. Office of Subsistence Management, USFWS. Anchorage, AK. 563 pp.

OSM 2020. Staff Analysis WP20-18b. Pages 687-711 *in* Federal Subsistence Board Meeting Materials. April 20-23, 2020. Office of Subsistence Management, USFWS. Anchorage, AK. 892 pp.

Pettorelli, N., F. Pelletier, A. von Hardenberg, M. Festa-Bianchet, and S. D. Côte. 2007. Early onset of vegetation growth vs. rapid green-up: impacts on juvenile mountain ungulates. Ecology 88(2): 381-390.

Robus, M. H. 1996. Unit 1C mountain goat management report. Pages 20–24 [*In*] M. V. Hicks, editor. Mountain goat management report of survey and inventory activities 1 July 1993–30 June 1995. Alaska Department of Fish and Game, Division of Wildlife Conservation, Federal Aid in Wildlife Conservation Project 12.0, Juneau.

Robus, M. H. and B. L. Carney. 1995. Effects of Kensington mine development on black bears and mountain goats. Wildlife baseline studies and monitoring plan. Final report. ADF&G. Douglas, AK.

Rutberg, A. T. 1987. Adaptive hypotheses of birth synchrony in ruminants: an interspecific test. American Naturalist 130: 692-710.

Salazar, K. 2010. Letter to Tim Towarak, Chair, Federal Subsistence Board, dated December 17. On file, U.S. Fish and Wildlife Service, Office of Subsistence Management. Anchorage, AK. 4 pages.

Schoen, J. W., and M. D. Kirchhoff. 1982. Habitat use by mountain goats in Southeast Alaska. Final report, Federal Aid in Wildlife Restoration, Projects W-17-10, W-17-11, W-21-1, and W-21-2, Job 12.4R ADF&G, Juneau, AK. 70 pp.

Schwartz, C.C., KA. Keating, H.V. Reynolds, V.G. Barnes, R.A. Sellers, J.E. Swenson, S.D. Miller, B.N. McLellan, J. Keay, R. McCann, M. Gibeau, W.F. Wakkinen, R.D. Mace, W. Kasworm, R. Smith, and S. Herrero. 2003. Reproductive maturation and senescence in the female brown bear. Ursus 14:109-119.

Scott, R. 2012. Unit 1C mountain goat management report. Pages 33–46 [*In*] P. Harper, editor. Mountain goat management report of survey and inventory activities 1 July 2009–30 June 2011. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR 2012-3, Juneau.

Scott, R. 2014. Unit 1C mountain goat management report. Pages 36-49 [In] P. Harper, editor. Mountain goat management report of survey and inventory activities 1 July 2011-30 June 2013. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR 2014-3, Juneau, AK.

SERAC. 2023. Transcripts of the Southeast Alaska Subsistence Regional Advisory Council proceedings. February 28-March 2, 2023. Office of Subsistence Management, USFWS. Anchorage, AK.

Shafer, A., J. Northrup, K. White, M. Boyce, S. Cote, and D. Coltman. 2012. Habitat selection predicts genetic relatedness in an alpine ungulate. Ecology, 93:1317-1329.

Sill, L.A. and D. Koster, editors. The Harvest and Use of Wild Resources in Haines, Hoonah, Angoon, Whale Pass, and Hydaburg, Alaska, 2012. ADF&G Division of Subsistence, Technical Paper No. 399, Douglas, AK.

Smith, B. L. 1976. Ecology of rocky mountain goats in the Bitterroot Mountains. MS Thesis, University of Montana. 240 pp.

Smith, C. A. 1984. Evaluation and management implications of long-term trends in coastal management goat populations in Southeast Alaska. Biennial Symposium of the Northern Wild Sheep and Goat Council 4: 395-424.

Smith, C. A. 1986. Habitat use by mountain goats in Southeastern Alaska. Final Report, Federal Aid in Wildlife Restoration Project W-22-1, W-22-2, and W-22-3, Job 12.4R. 63pp.

Smith, K. G. 1988. Factors affecting the population dynamics of mountain goats in west-central Alberta. Proceedings of the Biennial Symposium on Northern Wild Sheep and Goat Council 6:308-329.

Smythe, C.W. 1988. Harvest and use of fish and wildlife resources by residents of Petersburg, Alaska. ADF&G, Division of Subsistence Technical Paper No. 164. Juneau, AK.

St-Louis, A, S. Hamel, J. Mainguy, and S.D. Cote. 2013. Factors influencing he reaction of goats towards All-terrain vehicles. Journal of Wildlife Management 77(3): 599-605.

Taylor, S, W. Wall, and Y. Kulus. 2006. Habitat Selection by mountain goats in south coastal British Columbia. Proceedings of the Biennial Symposium of the North American Wild Sheep and Goat Council:1-23.

Towarak, T. 2016. Letter to Mike Bangs, Chair, Southeast Alaska Subsistence Regional Advisory Council, dated June 21. On file, U.S. Fish and Wildlife Service, Office of Subsistence Management. Anchorage, AK. 5 pages.

Toweill, D. E., S. Gordon, E. Jenkins, T. Kreeger, and D. McWhirter. 2004. A working hypothesis for management of mountain goats. Biennial Symposium of the Northern Wild Sheep and Goat Council 14: 5-45.

U.S. Bureau of the Census. 1995. Alaska: population of counties by decennial Census: 1900 to 1990. Compiled and edited by Richard L. Forstall, Population Division, Washington D.C.
https://www.census.gov/population/cencounts/ak190090.txt

Varley, N. C. 1995. The ecology of mountain goats of the Absaroka Range, south-central Montana. M. S. Thesis, Montana State University. Bozeman, MT. 104 pp.

Voyer, A. G., K. G. Smith, and M. Festa-Bianchet. 2003. Dynamics of hunted and unhunted mountain goat *Oreamnos americanus* populations. Wildl. Biol. 9: 213-218.

White, K. 2019. Mountain goat population monitoring and movement patterns near the Kensington Mine, Alaska. Wildlife Research Annual Progress Report. Alaska Department of Fish and Game, Division of Wildlife Conservation, Juneau.

White, K. S., and N. L. Barten. 2008. Mountain goat assessment along the Juneau access road corridor and near the Kensington Mine, Southeast Alaska. ADF&G, Division of Wildlife Conservation, Wildlife Research Annual Progress Report. Douglas, AK. 15 pp.

White, K.S., A. Crupi, R. Scott, and B. Seppi. 2011a. Goat movement patterns and population monitoring in the Haines-Skagway area. ADF&G, Wildlife Research Annual Progress Report, Juneau.

White, K.S., G.W. Pendelton, D. Crowley, H. Griese, K.J. Hundertmark, T. McDonough, L. Nichols, M. Robus, C.A. Smith, and J.W. Schoen. 2011b. Mountain Goat survival in coastal Alaska: effects of age, sex and climate. Journal of Wildlife Management, 75:1731-1744.

White, K.S., D.P. Gregovich, G.W. Pendleton, N.L. Barten, R. Scott, A. Crupi, and D.N. Larsen. 2012. Mountain goat population ecology and habitat use along the Juneau Access road corridor, Alaska. ADF&G, Division of Wildlife Conservation, Wildlife Research Final Report. ADF&G/DWC/WRR-2012-02. Juneau, AK. 82 pp.

White, K., and G. Pendleton. 2013. Mountain goat population monitoring and survey technique development. Alaska Department of Fish and Game, Division of Wildlife Conservation, Wildlife Research Annual Progress Report, Juneau.

White, K., and D. Gregovich. 2017. Mountain goat resource selection in relation to mining related disturbance. Wildlife Biology 1(4). http://doi.org/10.2981/wlb.00277

White, K., D. Gregovich, and T. Levi. 2018. Projecting the future of an alpine ungulate under climate change scenarios. Global Change Biology 24(3):1136–1149. https://doi.org/10.1111/gcb.13919

Wright, W.L. 1977. Ecology of the Cascades Mountain goat, Mount Baker-Snoqualmie National Forest, Washington. Ph.d. Diss., Western Washington University. Bellingham, WA. 107 pp.

SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Southeast Subsistence Regional Advisory Council Recommendation

Support WP24-02 **with OSM's Modification** to extend the Federal season for goat hunting in the proposal area to run from Jul. 15 – Dec. 31. The Council felt that extending the federal season for mountain goats in the proposal area to run from Jul. 15 – Dec. 31 would provide federal qualified subsistence users in the area with a meaningful subsistence priority.

Take No Action on WP24-03. The Council did not feel that WP24-03 met the requirements for closure to non-federally qualified users based on the information presented in the analysis and at the Fall 2023 Council meeting.

INTERAGENCY STAFF COMMITTEE COMMENTS

The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

Alaska Department of Fish and Game Comments

Wildlife Proposal WP24-02/03

These proposals would close federal public land within the drainages of the Chilkat Range south of the south bank of the Endicott River (State RG015; Figure 1) to mountain goat harvest from August 1-31, except by federally qualified users (FQU). An amendment proposed by the Southeast Regional Advisory Committee (SERAC) at their fall meeting would open a hunt for FQUs starting July 15. Non-federally qualified users (NFQU) would not be excluded for the month of August.

Figure 1. The current extent of the RG015 mountain goat hunt area on the Chilkat Peninsula, Alaska.

Position

The Alaska Department of Fish and Game (ADF&G) **OPPOSES** excluding NFQUs from hunting on federal public land in the RG015 hunt area during August. ADF&G contends the proposed closure is not warranted under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). In *Alaska v. Federal Subsistence Bd.*, 544 F.3d 1089, 1100 (9th Cir. 2008), the Ninth Circuit ruled that, under ANILCA, the Federal Subsistence Board (FSB) may regulate subsistence use but is prohibited from limiting nonsubsistence use. Closing federal lands within the RG015 hunt area to NFQU goat hunters during the month of August is inconsistent with ANILCA under applicable case law on federal preemption. Section 815 of ANILCA authorizes federal restrictions on nonsubsistence uses on the public lands only if

"necessary for the conservation of healthy populations of fish and wildlife" or if necessary to "continue subsistence uses."

Based on ADF&G's analysis of hunter participation, harvest, and hunt management over the last 20 years, none of those reasons apply. There is no conservation concern for mountain goats in the RG015 hunt area, the hunt has not been closed by emergency order in nearly 20 years, and the state season was recently expanded to offer an additional month of opportunity for resident hunters. Even if the opening date for the federal season is changed to August 1, the proposal would also close the entire RG015 hunt area when FQUs almost never use the northern two thirds of the hunt area. Even in the southern portion no restrictions on NFQUs are needed to continue subsistence uses of goats. Records of RG015 permits issued and mandatory hunt reports clearly demonstrate that the decline in goat hunting and harvest by FQUs in the RG015 hunt area results from declining interest and participation in that hunt. As stated during the SERAC meeting, the reason this proposal was submitted was to gain exclusive access to one road that leads to the alpine and provides one of the few road access points to goat hunting in Southeast Alaska. However, the goat population is doing well in this area with harvest objectives being met. Given these two factors, no restrictions should be put into place denying NFQUs access to hunt in this area and giving a particular group exclusive access to this hunting opportunity.

The recent expansion of the state season created an additional 31 days of hunting opportunity for all Alaska residents including FQUs during a favorable time of year. Before contemplating changes to existing federal regulations, the FSB should monitor whether FQUs take advantage of that expanded opportunity. During the first year of this expanded hunt (2023), no FQU took advantage of this hunting opportunity.

This proposal is based on a false premise and would needlessly and pointlessly deprive all Alaska residents (both FQU and NFQU) of sustainable mountain goat hunting opportunity throughout the RG015 hunt area during August, effectively negating the recent extension of the state season. The current state and federal season dates for that hunt are:

Existing State Regulation

Resident and non-resident	
Unit 1C, RG015 1 goat, harvest of nannies with kids prohibited	Sept. 1 – Nov. 30
Resident only	
Unit 1C, RG015 1 goat, harvest of nannies with kids prohibited	Aug. 1 – Aug. 31

Existing Federal Regulation

Rural residents	
Unit 1C – 1 goat by State registration permit only	Oct. 1 – Nov. 30

The current federal season in this area opens on October 1. The previous state season opened on September 1, one month earlier than the federal season. The recent expansion of the state season created an additional month of opportunity for all resident hunters including FQUs.

Background

In 1975 the Alaska Board of Game (BOG) reduced the bag limit for goats in Unit 1C, including the Chilkat Range from two goats to one goat due to overharvest concerns along the Juneau road-system and high mountain lakes with floatplane access. Also, the Chilkat Range along with other parts of Unit 1C were closed due to a decline in goat populations following a severe winter in 1984-1985. When the hunt reopened it was managed under a point system. By 2004 the standard for Unit 1C was an allowable harvest of 6 points for every 100 goats observed on surveys with billies valued at 1 point and nannies valued at 2 points. This management strategy equates to a 4–5% harvest rate, which has been established is sustainable for goats. Since 2011, 18 harvest points have been available in the Chilkat Range RG015 hunt area, and the hunt has not been closed by emergency order since 2005.

Prior to 2003, the state RG015 hunt opened on October 1. In 2003 the opening date was changed to September 1. That change was never mirrored in federal regulation, so for the last 20 years the state hunt has opened a month earlier than the federal hunt. At their January 2023 meeting the BOG changed the opening date for resident RG015 hunters to August 1, aligning it with opening dates for other Unit 1C goat hunts, RG013 and RG014, and creating an additional month of opportunity for all resident RG015 hunters. The BOG made this change because they felt the area was underutilized and could support additional harvest. Furthermore, this decision was based on information provided by ADF&G biologists that indicated there is little harvest within this goat population compared to what is available.

Aerial surveys for goats on the Chilkat Peninsula have been intermittent (Table 1) because this area has not been a priority due to low harvest and large areas of hunter-inaccessible goat habitat that buffers the goat population from harvest impacts. However, a survey was conducted in 2023. Across the surveys from 2000 to 2023, the total number of adult goats observed steadily increased across the surveys; however, the standardized measure of goats/hr does not show a trend, probably due to variation in survey conditions, which are known to influence goat survey results. Except for the 2006 survey, these results indicate the goat population met Unit 1C management objectives and were greater than 30 goats/survey hr. The 2023 survey indicates that the goat population is doing very well with the highest number of goats ever counted, very high kid production, and the highest standardized count of 63 goats/hr.

Table 1. Aerial survey results for the Chilkat Peninsula, 2000-2011.

Year	No. Adults	No. kids	Total goats	Kids:100 adults	Percent kids	Goats/ hour
2000	143	30	173	21	17	36
2002	152	26	178	17	15	85
2006	203	33	236	16	14	16
2011	223	44	267	20	16	51
2023	192	58	250	30	23	63

Analysis

The following analysis assumes the proposal will be amended to align the opening date of the federal season with the current state season.

All hunters who obtain registration permits like RG015 are required to provide their address. ADF&G does not confirm community of residence, but for this analysis we assume the address provided distinguishes FQU and NFQU hunters. Registration permit holders are also required to report a variety of information from which ADF&G can determine the number of FQU and NFQU permit holders who hunted, where they hunted, and if they harvested a goat. Goat hunting is physically demanding and often weather-dependent, so it is common for people to obtain permits but not hunt.

In the last 20 years 97% of FQU goat hunters, primarily residents of Hoonah, Gustavus, and Sitka, reported hunting the southern part of the RG015 hunt area accessed from Excursion Inlet and the Homeshore logging road system on the north shore of Icy Straits (Figure 2). The proposal cites competition for access in that area as the primary concern addressed by the proposed regulatory change. About half of NFQU hunters also reported accessing the RG015 hunt from this area. Because the proposal specifically mentions this area and because nearly all FQUs hunt in this area, ADF&G's comments and graphs for this proposal summarize data for only the southern portion of the RG015 hunt area as depicted in Figure 2.

The slight decline in goat harvest by FQUs in the southern RG015 hunt area (Figure 3) coincides with a decline in participation by FQU hunters (Figure 4). Since 2014, a maximum of five FQUs have reported hunting in any year, and no residents of Hoonah or Gustavus reported hunting during four of the last five years (Figure 5). Eighteen harvest points are available in RG015, and the hunt has not been closed by emergency order since 2005, so there has been ample opportunity to harvest a goat. The newly expanded state season provides even greater opportunity for all Alaska residents.

The proposal contends that competition with NFQUs for space to anchor boats in the Homeshore anchorage has inhibited FQU access to hunting opportunity. All hunters access this area by boat. The Homeshore anchorage provides little shelter, so some hunters prefer being dropped off to anchoring in a risky location, but ADF&G has no information on whether hunters anchored or were dropped off. However, considering the low total number of RG015 hunters using this area and that moose and goat seasons in this area have coincided for decades, any competition for space to anchor has likely also involved RM046 moose hunters. The extended state season should alleviate this concern.

The proposal also contends that people camping on the logging roads have blocked FQU access to goat hunting areas but provides no evidence that those campers were the NFQU goat hunters that the proposal seeks to exclude. The campers may have been other federally qualified goat hunters or RM046 moose hunters. The new August 1st opening date for the state RG015 hunt allows 6 weeks of goat hunting opportunity before moose season and will reduce the already limited potential for road access conflicts among hunters.

Over the last 20 years ADF&G's records indicate that an average of 9 people hunted the southern portion of the RG015 hunt area annually. The total number of hunters using the area has remained stable but in recent years the proportion of FQUs has declined while the proportion of NFQUs has grown (Figure 4). Reasons for declining interest and participation among FQU hunters are unknown. However, under the expanded four-month long state season all goat hunters will have an additional month of opportunity including six weeks before the RM046 moose season. The longer season makes it unlikely that more than a couple RG015 hunters will be in the Homeshore area at the same time, virtually eliminating any potential for competition among FQU hunters or between FQU and NFQU hunters.

If the Federal Subsistence Board follows the SERAC amendment, currently, there are no state managed big game hunting seasons in July in Southeast Alaska. It is often the warmest time of the year, and any harvested meat is liable to spoil before it can be put away. The animals will have a summer coat, and the hide will not be useful for many of the traditional uses of mountain goat hides. The time-period up to July 15th is considered a critical period for nannies and their kids, and disturbance of goats is not recommended by a position statement of the Northern Wild Sheep and Goat Council. It is expected there would be some negative impacts if goats were disturbed beyond this July 15th deadline as well.

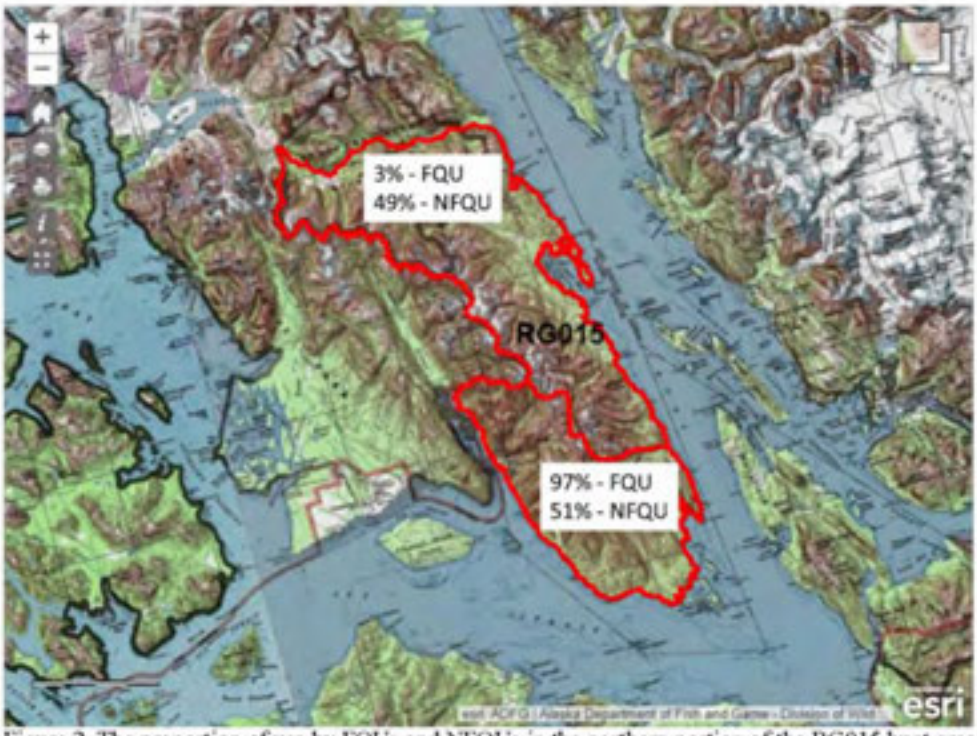

Figure 2. The proportion of use by FQUs and NFQUs in the northern portion of the RG015 hunt area generally accessed from Lynn Canal and the southern portion generally accessed from Icy Straits, 2003-2022.

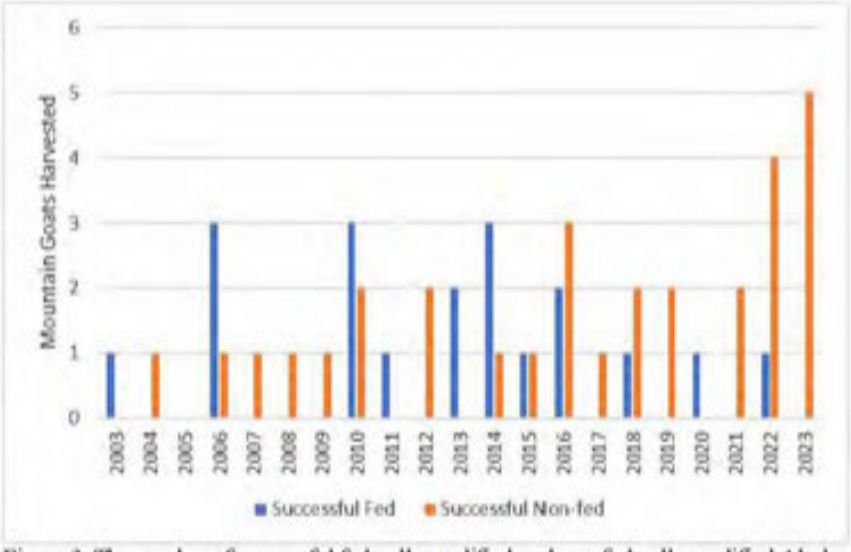

Figure 3. The number of successful federally qualified and non-federally qualified Alaska resident mountain goat hunters who accessed the southern Chilkat Range hunt, RG015, from Icy Straits, RG015, 2003-2023.

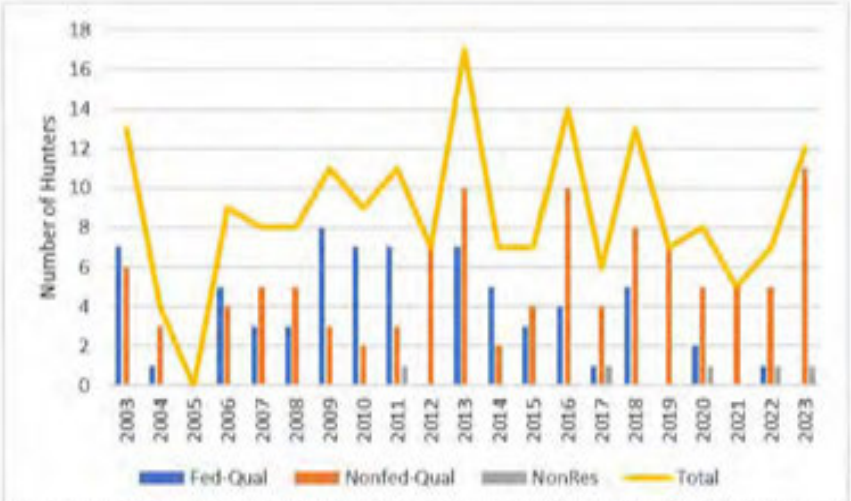

Figure 4. Participation by hunters from federally qualified and non-federally qualified Alaska communities and nonresident hunters in the Chilkat Range mountain goat hunt, RG015, 2003-2023.

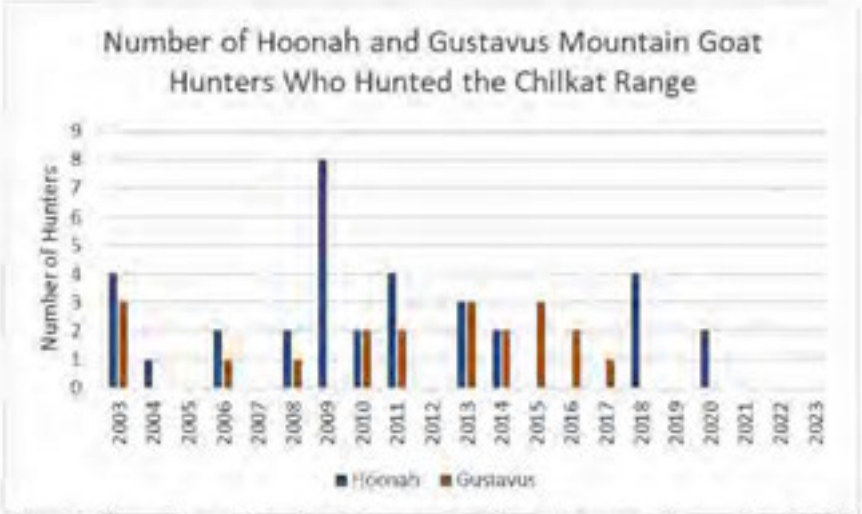

Figure 5. The number of Hoonah and Gustavus residents who reported accessing the Chilkat Range mountain goat hunt, RG015, from Icy Straits by Excursion Inlet or the Homeshore road system, 2003-2023.

Impact on Subsistence Users

This proposal will have very little impact for FQUs as they can currently hunt under the recently expanded state hunt.

Impact on Other Users

Adopting this proposal would unnecessarily deprive NFQUs of sustainable hunting opportunity throughout the entire RG015 hunt area during the month of August despite use by FQUs being limited to the southern portion accessed from Icy Strait. If the amendment is adopted, there will be 16 days of harvest prior to the state season before NFQUs can participate in the hunt.

Opportunity Provided by State

State customary and traditional use findings: The Alaska Board of Game has made positive customary and traditional use findings for mountain goats in Unit 1C outside the Juneau nonsubsistence area.

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

ANS provides the BOG with guidelines on typical numbers of animals harvested for customary and traditional uses under normal conditions. Hunting regulations can be re-examined if harvests for customary and traditional uses consistently fall below ANS. This may be for many reasons:

hunting regulations, changes in animal abundance or distribution, or changes in human use patterns, just to name a few.

The ANS for mountain goats in Unit 1C is 25- 30 animals outside the Juneau nonsubsistence area. The season and bag limit for Unit 1C is:

		Open Season (RG015)	
Unit/Area	Bag Limit	Resident[a]	Nonresident
1C	*1*	*Aug. 1 – Nov. 30 (Registration)*	*Sept. 1 – Nov. 30 (Registration)*

[a] Subsistence and General Hunts.

Conservation Issues

Currently, there are no conservation issues with this population. Harvest has been much lower than the 18 goat harvest points allowed for this area. ADF&G supported expanding the state season length for this hunt because department biologists believe the hunt area was underutilized, and more sustainable opportunity could be provided.

Enforcement Issues

There is always the possibility of enforcement issues when you have two differing hunting seasons occurring in the same area.

WRITTEN PUBLIC COMMENTS

Fw: [EXTERNAL] Comments on Southeast Proposals

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:14 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Thursday, July 6, 2023 8:51 AM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Comments on Southeast Proposals

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Ryan Beason <rlbeason14@gmail.com>
Sent: Saturday, July 1, 2023 1:46 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Comments on Southeast Proposals

I am opposed to the following proposals

WP24-04 (Southwest Admiralty)
WP24-05 (Hoonah Area / NCCUA)
WP24-06 (Pelican Area / Lisianski Inlet)
WP24-02
WP24-03

- Ryan Beason

RHAK
Resident Hunters of Alaska
unapologetically FOR ALASKAN RESIDENTS
PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

June 21, 2023

To: Federal Subsistence Board

Re: 2024-2026 Wildlife Proposals

Dear Chair Jacobson and members of the Federal Subsistence Board,

Below are comments from Resident Hunters of Alaska (RHAK) on Wildlife Proposals before the board for the 2024-2026 regulatory years.

Wildlife Proposal 24-03 – close a portion of Unit 1C, remainder (RG015 permit area) to goat hunting by non-Federally qualified users from Aug 1 – 31.

OPPOSE

*(Board members please note that Unit 1C Remainder is the RG 013 permit area, **not** the RG 015 permit area described in the proposal. Unit 1C Remainder under the RG 013 permit already had season dates for goat Aug 1 – Nov 30.*

We believe the proponent of this proposal means the RG 015 permit area in Unit 1C, drainages of the Chilkat Range south of the south bank of the Endicott River.)

As the proponent of WP 24-03 correctly states, the Board of Game at their Southeast meeting in 2023 passed proposal 31 from Resident Hunters of Alaska that expanded the Unit 1C goat registration hunt RG 015 permit season to Aug 1 – Nov. 30. This change aligns the season dates on the north end of the Chilkat Range with the southern end. In no way does this expanded RG 015 season take away from subsistence goat hunting opportunities or prevent subsistence hunters from harvesting a goat.

A "preference" to federally qualified users does not mean there needs to be an absence of NFQU opportunities, which the proponent of this proposal advocates. Competition alone is not a valid reason to restrict NFQU.

Alaska Department of Fish & Game data shows that over the past five years there has been an average harvest of 3 -9 goats on the entire Chilkat Peninsula, with few nannies being taken. Goats on the Chilkat Peninsula have increased from the lows of the past and current harvest quotas are not being reached. There is no reason to restrict NFQU during Aug 1 – 31.

Thank you board members for your attention to our comments.
Sincerely,
Mark Richards
Executive Director Resident Hunters of Alaska
www.residenthuntersofalaska.org

Fw: [EXTERNAL] Oppose Proposal #WP24-03

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:16 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Wednesday, July 5, 2023 8:27 AM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Oppose Proposal #WP24-03

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Bryce Saviers <b_saviers@hotmail.com>
Sent: Friday, June 30, 2023 10:34 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Oppose Proposal #WP24-03

Name: Bryce Saviers

Address: Juneau, AK 99801
Email: b_saviers@hotmail.com

I am against proposal WP24-03. This proposal seeks to limit anyone who doesn't qualify for subsistence from being able to hunt part of the Chilkats the entire month of August. The given area this proposal wants to close is closer to Juneau than any other town and Juneau doesn't qualify for subsistence. To give other residents priority of that area when the closest locals don't qualify for subsistence is ridiculous. The Chilkats is an area that is already difficult to get to and is only accessible by boat or plane. To close down the entire month of August to Juneau residents puts local Juneau residents at a huge disadvantage compared to other towns in Southeast that qualify for subsistence. Juneau may not qualify for subsistence but that doesn't mean it's locals don't hunt for subsistence. Juneau residents also suffer from high meat prices and an unreliable supply chain. Having a place close to town where we can harvest our meat before the storm season starts benefits Juneau and other Alaskan residents. The reason the board of game opened it for August 1st at the recent 2023 board of game meetings was because this area has had low harvest rates over the last decade. This is partially due to it not opening up until September 1st and in September that area deals with constant storms and weather that prohibits boats from anchoring and planes from flying in so hunter activity has been very minimal. The goat population in that area is strong and stable so there is no need to limit other Alaskan residents from being able to hunt it during August. I can understand limiting non residents to only be able to start hunting on September 1, but to limit Juneau residents from an area that is less than 20 miles from the Juneau airport is unjust. Please deny this proposal.

WP24-04 Executive Summary	
General Description	Wildlife Proposal WP24-04 requests to close the Federal public lands on Admiralty Island draining into Chatham Strait south of the Thayer Creek drainage, but excluding the Hasselborg Lake and Hasselborg Creek drainages, to non-federally qualified users from Nov. 1-15. *Submitted by*: *Southeast Alaska Subsistence Regional Advisory Council*
Proposed Regulation	**Unit 4 Deer** *Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31* — *Aug. 1 – Jan. 31* ***Federal public lands of Admiralty Island draining into Chatham Strait south of the Thayer Creek drainage but excluding the Hasselborg Lake and Hasselborg Creek drainages are closed to deer hunting Nov. 1-15, except by federally qualified subsistence users hunting under these regulations.***
OSM Preliminary Conclusion	**Oppose**
OSM Conclusion	**Support with modification** to remove Wildlife Analysis Area 4041 from the proposed closure area and reduce the proposed closure period from Nov. 1-15 to Nov. 1-10.
Southeast Alaska Subsistence Regional Advisory Council Recommendation	**Support with modification** to remove Wildlife Analysis Area 4041 from the proposed closure area and reduce the proposed closure period from Nov. 1-15 to Nov. 1-10. OSM's interpretation of the Council's intent is: **Unit 4 - Deer** *Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31.* — *Aug. 1 – Jan. 31* ***Federal public lands of Admiralty Island draining into Chatham Strait south of the Thayer Creek drainage and north of Woody Point but excluding the Hasselborg Lake and Hasselborg Creek drainages are closed to deer hunting Nov. 1-10, except by federally qualified subsistence users hunting under***

WP24-04 Executive Summary	
	these regulations.
Interagency Staff Committee Comments	The ISC acknowledges the extensive effort made by the Southeast Alaska Subsistence Regional Advisory Council (Council) during both the 2022-2024 and the 2024-2026 Wildlife Regulatory Cycles to help federally qualified subsistence users meet their subsistence needs for deer in the Angoon area. Deer populations in Unit 4 are the highest in the state and closures are not needed for conservation reasons. The Council's justification for submitting WP24-04 focuses on the closure being necessary to continue subsistence uses due to competition and user conflict in the areas closer to Angoon. While reported harvest success by federally qualified subsistence users appears stable over the last decade based on quantitative harvest data, federally qualified subsistence users in the area report these data underestimate local hunter effort and do not capture competition that affects their ability to harvest enough deer to meet their subsistence needs. The ISC recognizes the effort that the Council has put into providing a meaningful subsistence priority, while trying to reduce restrictions on non-federally qualified users as much as possible. Since submission of their first proposal for the 2022 regulatory cycle, the Council reduced the duration of their requested closure from 2.5 months to 15 days to the current Council recommendation of 10 days at the beginning of November and reduced the requested closure area to those areas closest to home and most utilized by Angoon residents.
ADF&G Position	**Oppose**
Written Public Comments	**1 Support** **36 Oppose**

STAFF ANALYSIS
WP24-04

ISSUES

Proposal WP24-04 was submitted by the Southeast Alaska Subsistence Regional Advisory Council (Southeast Council). The proponents are requesting to close the Federal public lands on Admiralty Island draining into Chatham Strait south of the Thayer Creek drainage, but excluding the Hasselborg Lake and Hasselborg Creek drainages, to non-federally qualified users (NFQUs) from Nov. 1-15 (see **Figure 1**). This proposed closure area corresponds approximately to Wildlife Analysis Areas (WAAs) 4041, 4042, and 4055 (see **Figure 2**).

DISCUSSION

The proponents submitted WP24-04 to establish a meaningful preference for the continuation of subsistence uses of deer by federally qualified subsistence users (FQSUs) in the Angoon area. Angoon residents depend on deer as a key component of their subsistence way of life. However, the proponents assert that residents in this area have been experiencing difficulties harvesting enough deer to meet their subsistence needs because of increasing competition and user conflict with non-federally qualified users (NFQUs). The proponents explain that NFQUs anchor boats in small bays, often inhibiting access to subsistence users' primary hunting areas. NFQUs may also decrease the success rates of subsistence users if they shoot deer and miss, causing deer to become more skittish and wary of hunter presence.

The proponents note that high fuel costs, depressed economies, small boats, and inclement weather are all impacting the ability of Angoon residents to meet their subsistence needs. Angoon residents cannot afford to have unsuccessful deer hunts, or to travel far from their community to hunt deer. The proponents note that NFQUs exacerbate these concerns by obstructing access, competing for deer, and potentially altering deer behavior, all of which decrease the chances of successful subsistence hunts and hinder the continuation of subsistence uses.

Subsistence livelihoods require effective and efficient harvests. The proponents explain that the proposed two-week closure window in early November is the most efficient time for subsistence deer hunting in Unit 4 for several reasons. First, the deer are still fat, providing the highest quality and amount of meat. Second, the deer are in rut, making them more susceptible to harvest. Third, weather conditions are typically favorable for hunting and proper meat processing.

The proponents assert that this two-week closure would allow for the continuation of subsistence uses and provide a meaningful subsistence priority, enhancing opportunity for subsistence users and helping them meet their subsistence needs by reducing competition and improving access to hunting areas during the most important time of year for subsistence deer hunting. Additionally, the proponents note that the proposed closure area is limited in scope but represents the area most hunted by Angoon residents. The proponents believe that this closure will have a relatively small impact on NFQUs who would maintain significant time and space to hunt deer in Unit 4, but the closure would greatly benefit local subsistence users.

The proponents also acknowledge that while tidelands are State managed lands unaffected by any Federal closures, that should not decrease the effectiveness or necessity of this proposed closure. Deer are primarily pushed to beaches by heavy snowfalls, which usually occur after the requested closure period. Additionally, much of the proposed closure area is extremely steep and does not contain many beaches. Lastly, the proponents assert that when deer are on beaches, they are usually feeding above the mean high tide line, which is under Federal jurisdiction.

Existing Federal Regulation

Unit 4 - Deer

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

Proposed Federal Regulation

Unit 4 - Deer

Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31.	*Aug. 1 – Jan. 31*
Federal public lands of Admiralty Island draining into Chatham Strait south of the Thayer Creek drainage but excluding the Hasselborg Lake and Hasselborg Creek drainages are closed to deer hunting Nov. 1-15, except by federally qualified subsistence users hunting under these regulations.	

Existing State Regulation

Unit 4 - Deer

Chichagof Island east of Port Frederick and north of Tenakee Inlet

Residents - 3 deer total	*Bucks*	*Aug. 1 - Sept.14*
	Any deer	*Sept. 15 - Dec. 31*
Nonresidents – 2 Bucks	*Bucks*	*Aug. 1 – Dec. 31*
Remainder		
Residents - 6 deer total	*Bucks*	*Aug. 1 - Sept.14*
	Any deer	*Sept. 15 – Dec. 31*

Unit 4 - Deer

Remainder

Nonresidents – 2 Bucks *Bucks* *Aug. 1 – Dec. 31*

Extent of Federal Public Lands/Waters

Unit 4 is comprised of approximately 96% Federal Public Lands, of which 99% are U.S. Forest Service (USFS) managed lands, and less than 1% National Park Service or U.S. Fish and Wildlife Service managed lands (Error! Reference source not found.).

Unit 4 consists primarily of Admiralty, Baranof, and Chichagof Islands, along with some smaller adjacent islands. The three proposed closure areas (WAAs 4041, 4042, and 4055) are all located on the southern end of Admiralty Island (see **Figure 2**). Together, WAA 4041, WAA 4042, and WAA 4055 compose approximately 24% of Admiralty Island (see **Table 1**).

Table 1. Proposed Closure Area in Relation to Admiralty Island

Location	**Area** (sq. mi.)
WAA 4041	108
WAA 4042	125
WAA 4055	157
Admiralty Island	1,646

Most of the area addressed in this proposal is within the Admiralty Island National Monument and the Kootznoowoo Wilderness. The most notable non-Federal land holdings are the area immediately surrounding the village of Angoon, and a strip of land surrounding most of Mitchell, Kanalku, and Favorite Bays, where the Kootznoowoo Corporation manages lands within 660 feet of tidewater (Alaska National Interest Lands Conservation Act, Section 506(a)(3)(c)).

Customary and Traditional Use Determination

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

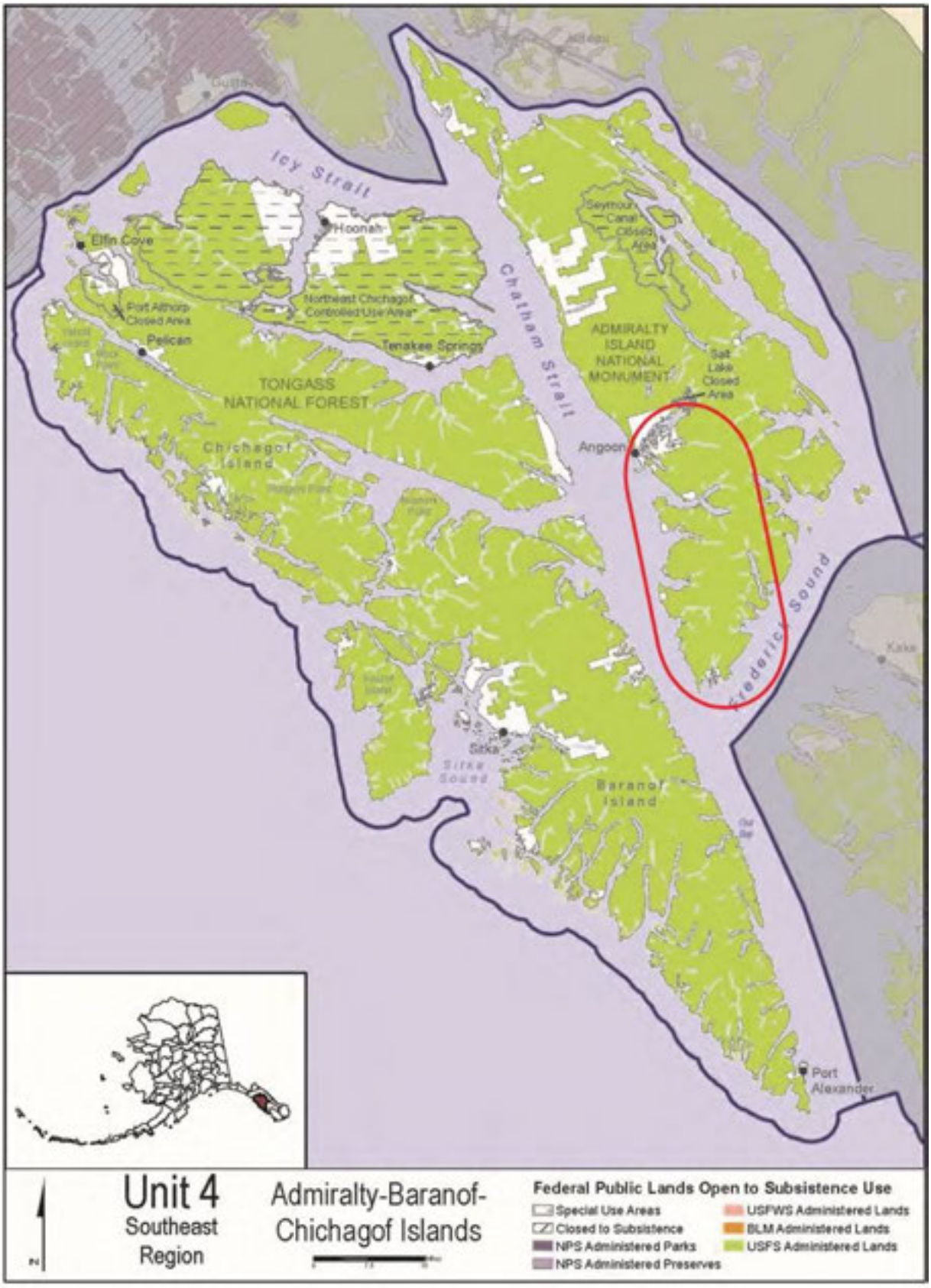

Figure 1. Unit 4 Map with Proposal Analysis Area Encircled in Red (For informational purposes only).

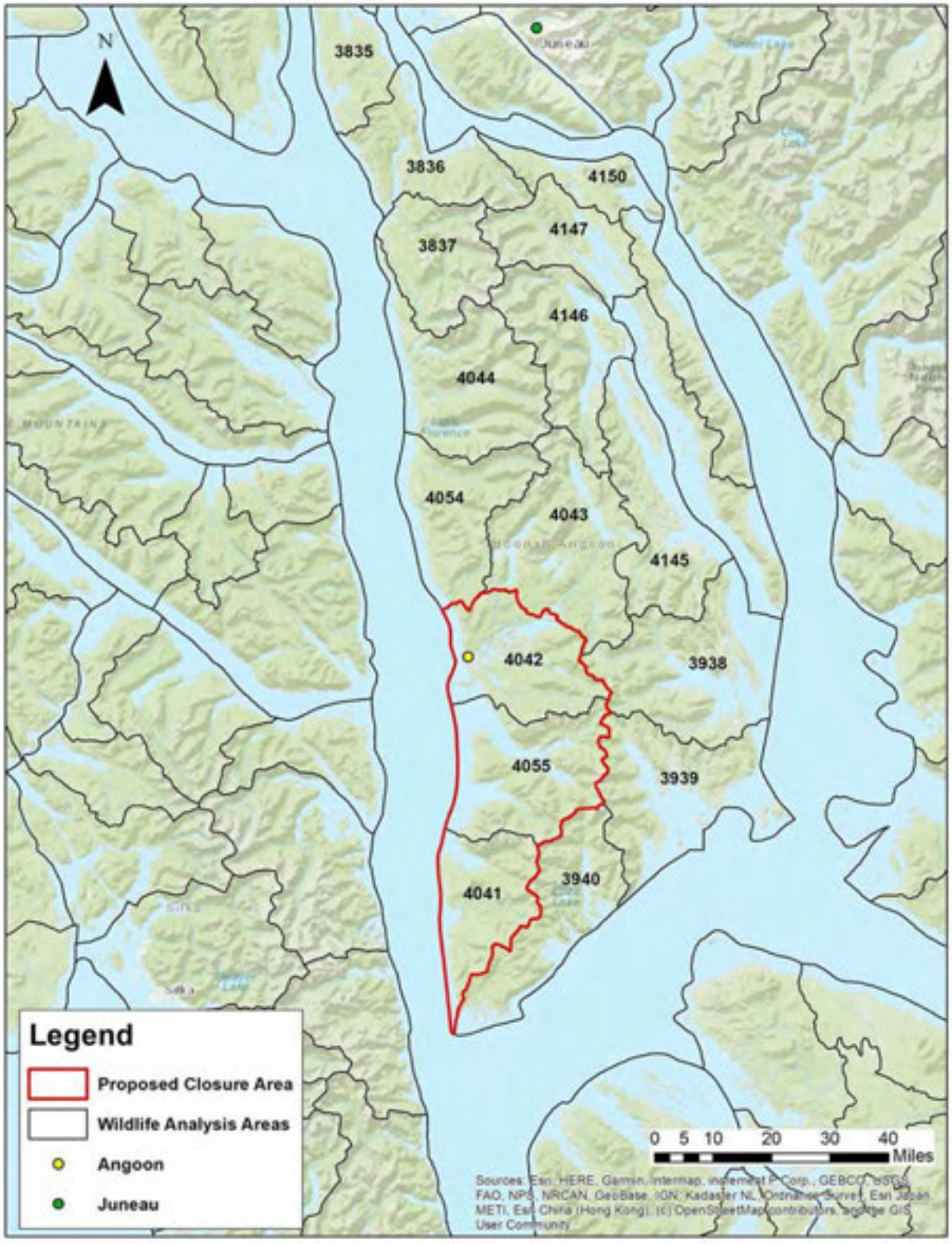

Figure 2. Angoon in Relation to Proposed Closure Area and Wildlife Analysis Areas on Admiralty Island (For informational purposes only).

Regulatory History

Except for the 1992/93 and 1993/94 regulatory years, the Federal harvest season for deer in Unit 4 has been from August 1 to January 31, with a harvest limit of six deer. However, harvest of antlerless deer has only been permitted from September 15 to January 31. In 1992, in response to several deep snow winters, the northern Baranof Island area harvest limit was reduced to four deer, the season was shortened to December 31, and the area closed to non-federally qualified users (NFQUs). In 1993, the northeast Chichagof Island area was closed to the harvest of deer by NFQUs after November 1 (OSM 2022a).

From the late 1980s through 1991, the State season in the northeast Chichagof area had a harvest limit of three deer. However, during this time, the State subsistence season allowed for the harvest of six deer, with the season running from August 1 through January 31. Since 1992, the State deer season has been from August 1 through December 31, with the harvest of antlerless deer only permitted from September 15 through December 31. For Chichagof Island east of Port Frederick and north of Tenakee Inlet, including all drainages into Tenakee Inlet, the State harvest limit has been three deer. The State harvest limit for the remainder of Unit 4 was four deer, until 2019, when it was increased to six deer.

In 2000, two proposals addressing Unit 4 deer regulations were submitted by members of the public during the Federal wildlife regulatory cycle (WP00-08 and -09). These proposals were motivated by conservation concerns following heavy snow winters during the 1998-1999 season, the increased winter deer mortality typically associated with heavy snows, decreased deer habitat due to recent logging in the area, and increasing hunting pressure enabled by logging road construction (OSM 2000). One proposal requested to rescind the January Federal deer season in Unit 4, while the other requested to rescind the January deer season and reduce the harvest limit from six deer to four deer. Both proposals were rejected by the Federal Subsistence Board (Board), consistent with the recommendations of the Southeast Council. The stated justification was that the available deer population and harvest survey data for Unit 4 did not indicate a conservation concern, and that the proposed changes would unnecessarily restrict subsistence opportunity (FSB 2000).

In 2010, three proposals addressing Unit 4 deer regulations were submitted during the Federal wildlife regulatory cycle (WP10-13, -14, and -21). These proposals were submitted following significant deer population declines that had occurred during the deep snow winters of 2006 through 2009. WP10-13 was submitted by the Southeast Council, requesting to close the female deer season on January 15 in that portion of Unit 4 draining into Chatham Strait, Peril Strait, and Icy Strait, including Tenakee Inlet. WP10-14 was submitted by the Southeast Council, requesting to close Federal public lands in the Northeast Chichagof Controlled Use Area (NECCUA) to the harvest of female deer by NFQUs in December. WP10-21 was submitted by the Southeast Council, requesting that deer harvest on the Federal public lands of the NECCUA be restricted to residents of Hoonah. None of these proposals were adopted by the Board. Instead, Federal and State managers closed the female deer season in the NECCUA for the 2010 regulatory year, and part of the 2011 and 2012 regulatory years. These closures were enacted to help the deer population recover from the deep-snow winters of 2006 through 2009.

In 2012, one proposal concerning Unit 4 deer regulations was submitted during the Federal wildlife regulatory cycle (WP12-06). This proposal sought to address population concerns following the deep snow winters of 2006 through 2009, by rescinding the January deer season in Unit 4. The Board rejected this proposal because it was determined that rescinding the January season would unnecessarily restrict subsistence users, while providing little conservation benefit (FSB 2012). Based on available survey and harvest data, Federal and State managers believed that the Unit 4 deer population had completely recovered from the previous deep-snow winters by the 2013 season (OSM 2022a).

In 2019, the Alaska Board of Game (BOG) adopted Proposal 18, increasing the State general season harvest limit from four deer to six deer in Unit 4 Remainder. The stated justification was that additional sustainable harvest opportunity could be provided because there were no conservation concerns.

In 2022, four proposals (WP22-07, -08, -09, -10) concerning Unit 4 deer regulations were submitted during the Federal wildlife regulatory cycle. WP22-07 was submitted by the Southeast Council, requesting that the Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner be closed to deer hunting from September 15 through November 30, except by FQSUs. WP22-07 was originally motivated by conservation concerns for the local deer population and an effort to prevent further depletion of the population by reducing hunting pressure from NFQUs (OSM 2022a). The current proposal, WP24-04, is similar to WP22-07 in that it requests a closure to deer hunting by NFQUs on a portion of Admiralty Island. However, the closure requested under WP24-04 is approximately half the size and nine weeks shorter in length than the closure originally requested under WP22-07. Further, as stated in the discussion section, WP24-04 is primarily motivated by concerns that high levels of competition from non-local hunters in the proposal area are posing a threat to the continuation of subsistence for local FQSUs.

WP22-08 was also submitted by the Southeast Council, requesting that the Northeast Chichagof Controlled Use Area (NECCUA) annual deer harvest limit for NFQUs be reduced to two male deer. WP22-09 was also submitted by the Southeast Council, requesting that the Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) be closed to deer hunting October 15 through December 31, except by FQSUs. Like WP22-07, the stated intent of WP22-08 and WP22-09 was to protect local deer populations from further depletion by reducing hunting pressure from NFQUs. The proponents asserted that this change would help increase harvest opportunity and provide for a meaningful subsistence priority for FQSUs in these areas (OSM 2022a, 2022b, 2022c).

WP22-10 was submitted by Patricia Phillips of Pelican. This proposal requested that the deer harvest limit for NFQUs in Lisianski Inlet and Lisianski Strait be reduced to four deer. The stated intent of WP22-10 was to reduce deer hunting pressure, provide for a meaningful subsistence priority, and thereby increase the ability of FQSUs to meet their subsistence needs (OSM 2022d).

At its April 2022 meeting, the Board rejected WP22-09 as part of the consensus agenda. The Board deferred Proposals WP22-07, -08, and -10 to its winter 2023 regulatory meeting, requesting the various

user groups in the area work together to create more mutually acceptable solutions to the issues surrounding deer harvest in Unit 4 (FSB 2022).

The Office of Subsistence Management (OSM) subsequently organized an open, public meeting regarding the deferred deer proposals for Unit 4 in August 2022. The meeting provided an opportunity for different user groups to discuss their recent deer hunting experiences in Unit 4, their plans for future harvest, and how the proposals might impact them. Additionally, participants were asked if they had specific recommendations on these proposals or if they had any other suggestions for the Board that would help resolve these issues. The outcomes from this meeting are summarized in detail in a previous OSM analysis (OSM 2022a).

The Southeast Council modified its recommendations for WP22-07 and WP22-10 following deferral and open meeting discussion. At its fall 2022 meeting, the Southeast Council supported WP22-07 with modification to remove Wildlife Analysis Areas (WAAs) 4043, 4044, and 4054 from the proposal area and create a harvest limit for NFQUs of two male deer within the remaining area (WAAs 4041, 4042, 4055) (OSM 2022a). This modification reduced the proposal area to roughly half of its original size and allowed for some harvest by NFQUs in the remaining proposal area (SERAC 2021b). This modification was recommended to focus the proposal on the area most utilized by FQSUs and to reduce the potential impact of the proposal on NFQUs (SERAC 2021b). This modified proposal area created under WP22-07 at the fall 2022 Southeast Council meeting is the same area currently being proposed for closure under WP24-04.

At the same meeting, The Southeast Council supported WP22-10 with modification to reduce the harvest limit for NFQUs to two male deer, and to maintain the same proposal area as recommended in Fall 2021. This modification was recommended because it was suggested that a harvest limit reduction of four deer or three male deer would not provide a significant conservation benefit or substantially enhance the success rates of FQSUs, but that the situation in the Northwest Chichagof might not warrant a full closure to NFQUs (SERAC 2021b). The Southeast Council also felt that reducing the harvest limit to two male deer for NFQUs would reduce administrative complexity and enforcement issues by aligning the proposed harvest limit reduction for the Northwest Chichagof area (WP22-10) with that of the Northeast Chichagof area (WP22-08) and Southwest Admiralty Island (SERAC 2022b). The Southeast Council retained its original Fall 2021 recommendation of support for WP22-08 without modification, to reduce the harvest limit for NFQUs hunting in the NECCUA to two male deer (OSM 2022b). The Southeast Council noted that all three proposals were still intended to help protect local deer populations from further depletion by reducing hunting pressure from NFQUs, and thereby increase harvest opportunity and provide for a meaningful subsistence preference for FQSUs in these areas (OSM 2022a, 2022b, 2022c).

All three proposals (WP22-07, -08, and -10) were subsequently rejected by the Board at its February 2023 regulatory meeting (FSB 2023). The stated justification was that the available data on deer populations in Unit 4 did not meet the criteria necessary to close land or implement harvest restrictions for the purposes of conservation or the continuance of subsistence uses under §815(3) of ANILCA (FSB 2023). Recent ADF&G survey and harvest data indicated that overall deer populations in Unit 4 were

among the highest in the State and that FQSUs in these areas were generally effective and efficient deer harvesters (FSB 2023). However, the Board member from the Bureau of Indian Affairs dissented on the basis that local ecological knowledge and testimony had been provided through the regulatory process, which indicated that FQSUs were having difficulty harvesting sufficient deer in the areas covered by the proposals (FSB 2023).

The BOG acted on State Proposals 10 and 11 at their January 2023 Southeast Region regulatory meeting (ADF&G 2022a). These proposals requested reducing the harvest limit for residents and nonresidents to four deer in Unit 4 Remainder. The proponents for both proposals listed the possible closure of Federal lands to deer hunting by NFQUs as a key factor in submitting their proposals. Both proponents suggested that a harvest limit reduction would protect deer populations, help reduce user conflicts in Unit 4, and avoid a closure of Federal public lands to NFQUs. The BOG adopted Proposal 10, with modification to reduce the nonresident harvest limit throughout all of Unit 4 to two male deer (ADF&G 2023a). The resident harvest limit remained three deer in Unit 4, Chichagof Island east of Port Frederick and north of Tenakee Inlet, and six deer in Unit 4 Remainder. The BOG took no action on Proposal 11, due to the action taken on Proposal 10.

Current Events

Two other proposals concerning deer regulations in Unit 4 were submitted for the 2024-2026 Federal subsistence wildlife regulatory cycle. WP24-05 was submitted by the Southeast Council, requesting to close the NECCUA surrounding Hoonah to deer harvest by NFQUs from November 1-15. WP24-06 was also submitted by the Southeast Council, requesting to close a portion of northwest Chichagof Island around Pelican to deer harvest by NFQUs from November 1-15.

The Hoonah Indian Association (HIA) received funding through the USFS Southeast Alaska Sustainability Strategy program to collect community harvest and biological information about deer on the north end of Chichagof Island from 2022-2027. This project is scheduled to be carried out in the communities of Hoonah, Pelican, and Gustavus. A North Unit 4 Deer Working Group has also been established under the guidance of the Hoonah Indian Association Environmental Programs (HIA Environmental 2023). The first meeting of this group was held on March 15, 2023. Preliminary information from HIA subsistence surveys and the deer working group has been integrated into the analyses for WP24-05 and WP24-06. HIA was not able to conduct surveys in Angoon.

At its fall 2023 meeting, The Southeast Council voted to support the current proposal (WP24-04) with modification to remove WAA 4041 from the proposed closure area and reduce the proposed closure period from November 1-15 to November 1-10 (see **Figure 4**). The Council felt this action was necessary to support the continuation of subsistence uses in this area, while also causing the least possible impact to NFQUs (SERAC 2023a).

Biological Background

Sitka black-tailed deer spend the winter and early spring at low elevation where less snow accumulates, and forests provide increased foraging opportunities. Fawning occurs in late May and early June as vegetation greens-up, providing abundant forage to meet the energetic needs of lactating does. Migratory deer follow the greening vegetation up to alpine for the summer. Resident deer remain at lower elevations. The breeding season, or rut, generally occurs in October through November, and peaks in late November (ADF&G 2009). Wolves and black bears are not present in Unit 4, so their primary predators in the area are humans and brown bears. Brown bears are estimated to kill an amount of deer equal to 15%-20% of the total annual deer harvested by hunters (Mooney 2009). Significant changes in deer populations and localized deer density levels are relatively normal over time in Unit 4 (Bethune 2020). Periodic declines are often attributable to severe winter weather, particularly deep snow events (Bethune 2020; Olson 1979). This issue is clearly illustrated in the regulatory history, and the frequency with which proposals to change Unit 4 deer hunting regulations follow heavy snow winters.

Habitat

Unit 4, like most of Southeast Alaska, has a maritime climate characterized by high rainfall and moderate summer and winter temperatures (Bethune 2020). However, the amount of rain and snow received can vary significantly from year-to-year, and across the unit (Bethune 2020). The landscape of Unit 4 is characterized by steep and rugged terrain with mountains, fjords, estuaries, and short, swift rivers (Bethune 2020). Vegetative communities occurring at low to moderate elevations (<1,500 feet) "are dominated by western hemlock (*Tsuga heterophylla*) and Sitka spruce (*Picea sitchensis*), with western red cedar (*Thuja plicata*) and Alaskan yellow cedar (*Chamaecyparis nootkatensis*) old-growth forests. Mixed conifer muskeg and deciduous riparian forests are also common. Mountain hemlock (*Tsuga mertensiana*) comprises a subalpine timberline band between 1,500 - 2,500 feet in elevation" (Bethune 2020: 4).

Old-growth forests are considered primary deer winter range, in part because the complex canopy cover allows sufficient sunlight through for forage plants to grow but intercepts snow, making it easier for deer to move and forage during winters when deep snow hinders access to other habitats (McCoy 2017). Some areas of Unit 4 have been significantly impacted by large-scale changes in habitat due to logging, while the habitat in other areas is largely intact (OSM 2022a). Areas with substantial timber harvest, such as northeastern Chichagof and northwestern Baranof Islands, are expected to have lower deer carrying capacity compared to pre-harvest conditions (OSM 2022a). Deer may shift their activity patterns in response to intensive logging and subsequent forest succession (Brinkman et al. 2009). The density of deer in these areas may decline as even-aged young-growth stands progress beyond shrub and sapling stages to stem exclusion forests characterized by thick canopies and sparse understory browse (Brinkman et al. 2009: 39).

Much of the area covered under this proposal, WP24-04, is located in old-growth forests within Admiralty Island National Monument and the Kootznoowoo Wilderness that are considered more conducive to winter deer survival (OSM 2022a).

General Population Information for Unit 4

Monitoring deer populations in forested habitat is challenging, as the total number of deer cannot be directly counted through ground or aerial surveys (Brinkman et al. 2013). Changes in deer populations in Unit 4 have historically been monitored using three complementary methods: deer pellet surveys, harvest reporting/hunter surveys, and aerial alpine surveys. Winter body condition and beach mortality surveys may also be conducted to understand changes in the health and abundance of area deer populations (Bethune 2020).

Deer pellet surveys were used in the Southeast region from 1981 to 2019 to monitor deer population trends and document substantial changes (≥ 30%) in deer density in specific watersheds (McCoy 2017, Bethune 2020). An average of <1.00 pellet group per survey plot generally indicates a low-density deer population, an average of 1.00 – 1.99 pellet groups per survey plot indicates a moderate-density population, and an average of >2.00 pellet groups per survey plot typically indicates a high-density population (Kirchoff and Pitcher 1988, Bethune 2022a). Deer pellet survey data, however, should be interpreted with caution, "as factors other than deer population size can affect deer pellet-group density" (McCoy 2017: 2). Issues such as winter severity and snowfall patterns, temperature and humidity, variability in survey effort, the length of time since the last survey, timing of vegetation green-up and changes in pellet group detectability, and changes in habitat can all impact pellet-group density and/or detection (McCoy 2017). A recent deer pellet study conducted by Brinkman and colleagues (2011, 2013) on Prince of Wales Island using DNA-based methods found that current ADF&G/USFS deer pellet survey techniques did not provide an accurate index of deer populations when extrapolated across time, or beyond the local scale. As the researchers explained:

> Over the past three decades, ADF&G and USFS have used deer pellet counts as the primary tool to monitor deer population trends. Precise estimates of trends in deer abundance are needed because perceived fluctuations in the deer population size above or below a predetermined population objective set by ADF&G results in changes in harvest regulations. Despite heavy reliance on these data, pellet group counts of black-tailed deer were compared with an independent measure of [deer] population size only once. In that study, 13 radio-collared deer were introduced to a small (approx. 40 ha) island in southeast Alaska. Researchers returned to the island 264 days later and surveyed 1.9% of the island for pellet groups. Data from that study indicated that a pellet group density of 0.05 pellet groups/m² represented 12 deer/km² (95% CI = 10.7 deer/km² – 13.8 deer/km²). This estimate assumed constant pellet persistence, detection, and deposition rates. Unfortunately, data were obtained only during a single year, which prevented any evaluation of how well pellet groups deposited during winter tracked changes in deer population. Also, only 4 deer remained on the island (6 swam off and 3 died) when researchers returned to conduct pellet group counts, which complicated the association between deer numbers and number of pellet groups encountered. Moreover, the island was much smaller than typical deer home ranges (which likely concentrated deer activity) and habitat diversity was low when compared with typical deer ranges in southeast Alaska. Consequently, the usefulness of the study for evaluating the reliability of pellet-group surveys as conducted by ADF&G and USFS personnel was limited (Brinkman et al. 2013: 445).

Brinkman and colleagues (2013) also noted that though their deer pellet index was not directly comparable to that developed by ADF&G/USFS because of differing methodologies, their model suggested that a similar deer pellet density of 0.05 pellet groups/m² across a mix of habitat types on Prince of Wales Island would indicate a minimum deer count of 2.9 deer/ km², with a much wider margin of error (95% CI = 0.4 deer/km² – 24.3 deer/km²). Previous pellet group count studies conducted outside of Alaska that demonstrated the usefulness of pellet-group counts were conducted under conditions that are difficult to replicate with unenclosed populations of deer in unmanaged landscapes (Brinkman et al 2013). The researchers concluded:

> The variation we reported between estimates of pellet-group counts and deer counts at the transect level do not support the use of pellet-group count surveys to reliably monitor trends in deer populations at larger spatial scales. Indeed, during our study, pellet-group data aggregated within watersheds did not reflect the decline in deer count within those watersheds. For instance, in the Staney watershed, DNA results indicated a 24% decline in minimum deer count from 2006 to 2008, whereas pellet group counts indicated a 17% increase over the same years (Brinkman et al. 2013: 449).

Further, as Bethune (2022a: 6) notes:

> Sitka black-tailed deer density estimates on old growth winter range vary widely (10 – 57 deer/km² or 26 – 148 deer/mi²). The most accurate deer estimates to date for Southeast Alaska come from Brinkman et al. (2011), who estimated density using a fecal DNA-based mark-recapture design on Prince of Wales Island. In addition, McCoy et al. (2014) also estimated density using fecal DNA with both mark-recapture and spatial mark-recapture models on northeastern Chichagof Island. Brinkman et al. (2011) estimated 12 deer/km² (31 deer/mi²) in unmanaged (unlogged) forest lands with a range of 8.5 – 17 deer/km² (22 – 44 deer/mi²) across all habitat types. McCoy et al. (2014) estimated densities ranging from 4.4 deer/km² (11.4 deer/mi²) to 11.9 deer/km² (30.8 deer/mi²) based on the year and analysis used. In comparison, Kirchhoff (1994) estimated an average density of 35.6 deer/km² (92 deer/mi²) based on pellet group counts. Density-estimate techniques using fecal DNA are some of the most advanced applications available to managers and can provide precise estimates; but they can be expensive, labor intensive, and results are only applicable to small areas.

Population Information for the Proposal Area

There have been no recent deer pellet surveys conducted in the proposal area. However, recent pellet surveys conducted in other parts of Unit 4 have generally indicated increasing populations from prior years (McCoy 2019; Bethune 2020). The last surveys conducted on Admiralty Island took place in Pybus Bay in 2019, Barlow Cove in 2018, and Hawk Inlet in 2017 (Bethune 2022a). Each of these surveys exhibited an average pellet count greater than 2.00 (Bethune 2022a). As the ADF&G Regional Supervisor explained during a recent Southeast Council meeting, “deer pellet densities in Game Management Unit 4, no matter where you do them, are always the highest in the region” (SERAC 2021b: 476). However, he did also note that “The department does not monitor deer populations in these relatively small areas affected by the proposal. We monitor deer populations on a unit-wide level”

(SERAC 2021b: 351). This statement, as well as the previously mentioned study by Brinkman and colleagues (2013), lends credence to local testimony presented at recent Southeast Council meetings that deer populations may not be tracked at a fine enough scale to capture periodic, localized declines (see SERAC 2021b). ADF&G discontinued deer pellet studies in Southeast Alaska in 2019 (ADF&G 2023b).

Aerial alpine survey work began in 2013, as an effort to provide a new, timelier method to assess and monitor the abundance of deer in alpine areas (Bethune 2020). These surveys are intended to be flown each summer before the hunting season, with deer seen per survey hour constituting the standard unit of measurement (Bethune 2020). As Bethune (2020: 25) notes, "The alpine survey technique appears to be a useful tool for gauging deer abundance immediately prior to hunting season. However, research is needed to learn more about what alpine surveys tell us about the larger deer population."

Aerial alpine surveys were conducted over two locations in Unit 4 between 2015 and 2018 (Bethune 2022a). Surveys were flown over Southern Admiralty Island in 2015-2017, and Northeast Chichagof Island in 2017 and 2018 (Bethune 2022a). Southern Admiralty Island exhibited the highest deer seen per hour of any survey conducted in Southeast Alaska during this time, while Northeast Chichagof exhibited numbers similar to north Prince of Wales Island (POW) (see **Figure 3**). It is not clear to what extent these aerial surveys covered the current proposal area. Aerial surveys were not conducted in 2019 and 2020 due to COVID-19 restrictions (Bethune 2022a).

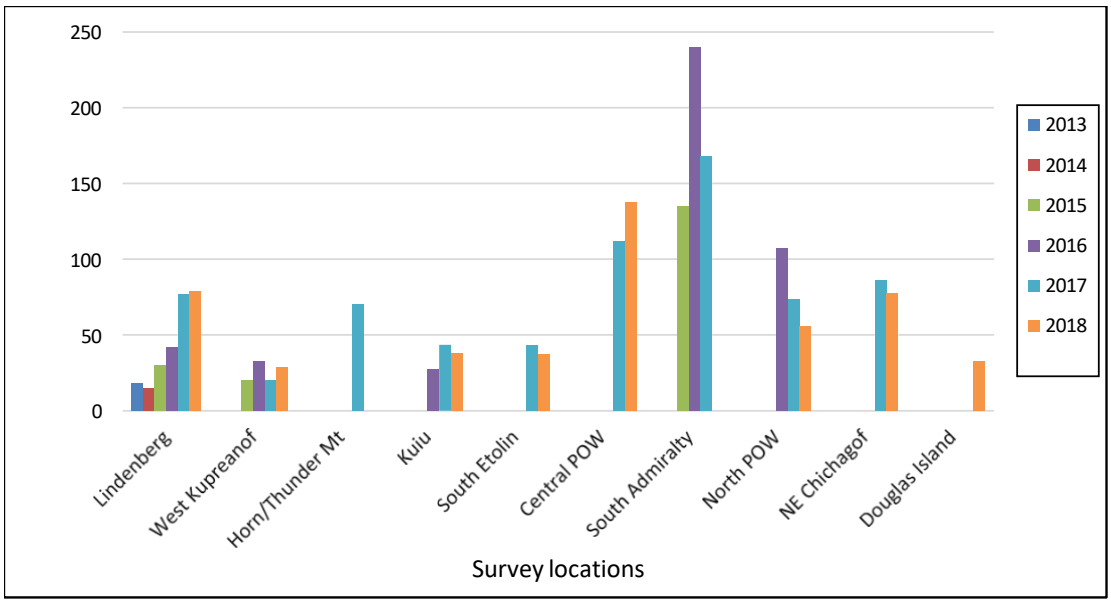

Figure 3. Average Number of Deer Counted per Hour during Mid-Summer Aerial Alpine Surveys in Southeast Alaska, 2013 – 2018 (Bethune 2022a).

Annual harvest data estimated from harvest reports can also provide another indicator of deer population status, and potential change over time (Bethune 2022a). The most recently reported five-year average (2016-2020) for all harvests in Unit 4 was approximately 5,742 deer per year (see **Table 2**, Bethune 2022a). During this time, the greatest amount of harvest occurred on Chichagof Island, followed by Baranof Island and Admiralty Island (Bethune 2022a). The total estimated per year harvest average during this period was very similar to the average of 5,674 deer harvested each year during the previous

five-year reporting period from 2011-2015 (**Table 2**). The greatest amount of harvest during the 2011-2015 reporting period also took place on Chichagof Island, followed by Baranof Island and Admiralty Island (Bethune 2020). The estimated average number of all hunters hunting in Unit 4 each year increased slightly between these five-year reporting periods (+4% or +126 hunters), while the average number of total hunter days per year decreased slightly (-3% or -446 hunter days) (**Table 2**). Still, the harvest levels estimated for the two most recent five-year reporting periods (2011-2015 & 2016-2020) are substantially lower than those estimated for the 2001-2005 reporting period (**Table 2**). Yet, the estimated average number of users hunting each year during these three reporting periods (2011-2005; 2011-2015; 2016-2020) is quite similar (**Table 2**).

Recently reported five-year harvest and hunting efforts in the proposal area follow different trends (see **Table 9**). This issue is discussed in detail in the harvest history section of the analysis because it is important to consider in light of the proponents' statements about increased competition impacting Angoon residents' deer hunting efforts in the proposal area.

Based on the combination of harvest data, pellet survey data, aerial surveys, and related information, managers in the area assert that the overall deer population in Unit 4 has recovered from the population declines suffered during the severe winters of 2006-2008, and it may be reaching winter carrying capacity in some areas (Bethune 2022a). Most recently, the heavy snowfall that took place in December 2021 led to some concerns about over-winter mortality. However, the rest of the 2021-2022 winter exhibited mild to average weather conditions and the mortality surveys conducted in the spring of 2022 found that over-winter mortality was not higher than normal, and that the body condition of live deer was similar to that seen in previous years (Bethune 2022b).

Table 2. Estimated Total Harvests and Hunting Effort in Unit 4 during Recent Five-Year Reporting Periods (ADF&G 2005-2006, 2006-2007; Mooney 2007, 2009, 2011, 2015; Bethune 2020, 2022a).

Year	Total Hunters	Total Hunter Days	Total Harvests in Unit 4
2001	3581	-	7457
2002	3414	-	5117
2003	3637	-	7621
2004	3363	-	6787
2005	3166	-	6983
5 Year Average	**3432**	**-**	**6793**
2006	3057	-	7741
2007	1999	-	1846
2008	2378	-	3855
2009	2280	-	3909
2010	2709	-	4688
5 Year Average	**2485**	**-**	**4408**
2011	3157	14020	6909
2012	3103	12214	4853
2013	3248	13094	5409
2014	3435	13815	4694
2015	3733	15183	6505
5 Year Average	**3335**	**13665**	**5674**
2016	3742	14535	7192
2017	3478	12555	5255
2018	3449	13425	5229
2019	3382	12870	5979
2020	3252	12712	5055
Year	**Total Hunters**	**Total Hunter Days**	**Total Harvests in Unit 4**
5 Year Average	**3461**	**13219**	**5742**
Overall Average	**3178**	**13442**	**5654**

Cultural Knowledge and Traditional Practices

Community Characteristics

Angoon is a Tlingit community of long standing located on the southwestern shore of Admiralty Island, at the entrance to Kootznahoo Inlet. It is now one of the older and more remote communities in Alaska, with a history that can be traced back hundreds of years, when smaller Tlingit villages and camps in the area became more concentrated (Garfield 1947). It is the only permanent community on Admiralty Island (ADCCED 2023). Angoon is located about fifty-five miles southwest of Juneau, and it is only accessible by floatplane or boat. An Alaska State ferry is scheduled to visit Angoon up to twice a week from March through December (Grant and Sill 2017; Juneau Empire 2022, State of Alaska 2023). However, ferry runs are occasionally canceled due to poor weather, mechanical issues, and other reasons. The ferry is not scheduled to visit Angoon in January or February (Juneau Empire 2022). Members of the Southeast Council and other residents of the area have also noted that the ferry system has not been as dependable as it was before the COVID-19 pandemic and State budget cuts (SERAC 2021b).

Commercial economic opportunities have historically been limited to resource industries in the Angoon area. Maritime fur trading was the major commercial activity in this area during the Russian America period (1799-1867) (ADCCED 2023). In 1878, shortly after the Alaska Purchase, the Northwest Trading Company established a trading post and whaling station on nearby Killisnoo Island (ADCCED 2023). Angoon residents were employed as whalers during this time. Angoon first appeared in the US Census in 1880, as the Native Village of "Augoon" [sic], having a population of 420 residents (see **Table 3**). The Northwest Trading Company soon converted its operations on Killisnoo Island from whaling to herring fishing and processing. Commercial fishing and processing have been economic mainstays and key sources of employment and income for residents of the area since this period (Grant and Sill 2017, ADLWD 2021). These commercial activities have become important complements to the more traditional subsistence hunting and fishing practices that have taken place in the area for generations and remain key to local livelihoods and lifestyles (Grant and Sill 2017).

Table 3. The population of Angoon from 1880 to 2022. (Note that Census data was not collected for Angoon from 1890 to 1910) (ADCCED 2023).

Year	1880	1920	1930	1940	1950	1960	1970	1980	1990	2000	2010	2020	2022
Population	420	114	319	342	429	395	400	465	638	572	459	357	340

Subsistence Practices

Although subsistence hunting and fishing practices have been highly important for food provisioning in Angoon, the Tlingit and many other indigenous and rural Alaskan communities regard subsistence as much more than the acts of harvesting, preparing, and eating the food required for nourishment (Thornton 2008). As Thornton (2008: 117) notes, the Tlingit "regard subsistence as an intricate and profound set of relationships with particular geographic settings where their social groups have dwelled historically. For them subsistence is *haa Kusteeyí*, 'our way of living,' 'real being,' and 'enriching

existence,' and not just 'the minimum (food, etc.) necessary to support life.'" In Angoon, this type of perspective on subsistence still holds sway, and proposals to provide for a meaningful subsistence priority against increased hunting competition should be approached with this in mind (SERAC 2021b). As the Southeast Council member from Angoon recently commented on a similar deer proposal, "When you look at this proposal [WP22-07], it appears the federally qualified community is trying to protect our way of life and access to the [deer] resource" (SERAC 2021b: 505). "We don't ask for anything but an opportunity to hunt in peace off the resources that our fathers and grandfathers decided were here when they settled here. We didn't settle in Juneau. We didn't settle anywhere else. We settled here" (SERAC 2021b: 411).

Deer have been a key subsistence resource utilized by Angoon community members for generations (Goldschmidt and Haas 2000), and generally represent the most significant terrestrial source of meat for rural residents of southeast Alaska (Brinkman et al. 2009). Angoon residents have historically hunted deer on Admiralty, Baranof, and Chichagof Islands, traveling farther in pursuit of deer than any other subsistence resource (Goldschmidt and Haas 2000). In comprehensive household subsistence surveys conducted in Angoon over the past four decades, deer consistently ranked as the first or second resource in terms of bulk contribution to local subsistence diets, trailing only salmon or non-salmon fish (see **Table 4**, George and Kookesh 1982, George and Bosworth 1988, Grant and Sill 2017). In the most recent subsistence study conducted by ADF&G researchers in 2012, deer were estimated to compose approximately 28% of the subsistence contribution to Angoon households' diets (Grant and Sill 2017: 223; see also **Table 4**). This figure ranked second only to that of non-salmon fish, which composed about 29% of the subsistence contribution to Angoon households' diets (Grant and Sill 2017; **Table 4**).

Subsistence studies conducted in Angoon have also illustrated the cultural importance of reciprocity and sharing of subsistence resources within the community, as sharing of subsistence resources and knowledge promotes sociality and future harvest success, while preventing potential waste when subsistence resources are harvested in abundance (see **Table 4**, Langdon and Worl 1981, Langdon 2021). Over all four comprehensive subsistence studies, an average of 42% of Angoon households reported giving deer to others, while 45% of Angoon households reported receiving deer from others (**Table 4**). An average of 54% of the households in Angoon reported attempting to harvest deer, while an average of 87% of households reported using deer (**Table 4**). This data conforms to findings from subsistence studies conducted in many other rural Alaskan communities, where a smaller proportion of households often harvest a greater percentage of local subsistence resources, which they typically share or trade with other households (Wolfe and Walker 1987).

Table 4. Estimated Harvest, Use, and Sharing of Deer by Angoon Households in 1984, 1987, 1996, and 2012 (ADF&G 2023c, George and Kookesh 1982, George and Bosworth 1988, Grant and Sill 2017)

	1984	1987	1996	2012
Population of Angoon	622	521	581	342
Percent Attempting to Harvest Deer	63%	N/A	50%	49%
Percent Harvesting Deer	60%	75%	50%	45%
Percent Giving Deer	50%	40%	26%	38%
Percent Receiving Deer	45%	46%	49%	51%
Percent Using Deer	90%	100%	74%	84%
Total Number of Deer Harvested	454	474	370	218
Average Harvest per Household (lbs.)	251	272	184	143
Average Harvest per Person (lbs.)	58	73	51	51
Deer Rank in Contribution to Subsistence	2nd	1st	2nd	2nd

In Angoon, deer hunting strategies align with the species' yearly lifecycle (George and Kookesh 1982). Fawns are born in late spring in trees edging muskeg or beach (George and Kookesh 1982). In summer, deer move into the alpine areas until the fall when they enter mature forests (George and Kookesh 1982). During winter, deer live in the forest below the snow line until heavy snows drive them down to the beaches where the forest fringe of old growth timber keeps the ground relatively snow free (George and Kookesh 1982). Therefore, Angoon residents describe using three different hunting strategies that are associated with specific seasons, weather, geographic locations, and deer behavior (George and Kookesh 1982). These strategies are broadly described as the Alpine Hunt, the Muskeg and Forest Hunt, and the Beach Hunt (George and Kookesh 1982). However, due to the generally steep and rugged landscape of the area, beach hunting is the dominant strategy used in Angoon and many other parts of Unit 4 (George and Kookesh 1982). Beach hunting takes place throughout the deer hunting season, as this hunting strategy is typically more efficient than the others (George and Kookesh 1982). In addition to trips focused on deer hunting, hunters opportunistically hunt the beaches whenever travelling by boat along the coastline (George and Kookesh 1982; SERAC 2021a, 2021b). Where and when Angoon residents hunt deer is influenced by deer presence, competition from other hunters, proximity to Angoon, need, knowledge of the area, weather, and beaches suitable for boat landing (SERAC 2021b).

Angoon residents previously harvested significant numbers of deer along west Chatham Strait and northwest Admiralty Island, during the years when the commercial fishing industry was stronger and fish canneries operated in these areas (Goldschmidt and Haas 2000). Broad participation in the commercial seine fishery allowed many Angoon fishers to travel long distances safely and harvest various subsistence foods, like deer, while in the process of catching and delivering their commercial harvests. Unfortunately, the Angoon cannery burned down in 1961, and the loss of the cannery was at least partially responsible for many Angoon residents selling their seine boats. Local boat owners no longer had their own company to fish for, to receive credit from, or a place to store and repair their boats (George and Bosworth 1988). The continued decline of the local commercial fishing industry and loss of associated income has contributed to the population decline witnessed in Angoon since the mid-1990s, as people have moved away in search of employment and other economic opportunities (see **Table 3**). For example, in 1986 there were 162 commercial fishing permits issued to Angoon residents for all

commercial fisheries (Grant and Sill 2017). In 2012, however, only 17 commercial fishing permits were issued to Angoon residents (Grant and Sill 2017). The loss of income from commercial fishing, coupled with the rising costs of fuel, the rising costs of store-bought food, and supply chain problems have all contributed to the food security issues and human population declines witnessed in Angoon and similar rural Alaskan communities in recent years (Grant and Sill 2017). The Southeast Council member from Angoon described these important changes at a recent Council meeting:

> In 1988, we had ferry service you could rely on. The price of food was reasonable. Every home in Angoon had a commercial permit so we were able to support ourselves with financial opportunity through fishing. We had food security because we could go out and rely on the resources our elders decided were here when we stopped in and decided this is where we're going to be (SERAC 2021b: 335–336).

An increase in the hand troll fleet and the use of skiffs paralleled the decline of large seiners in the community and in the commercial fishing industry throughout Southeast Alaska (George and Bosworth 1988; SERAC 2021a, 2021b). Loss of seiners and declines in fishing as a commercial activity also required a shift in subsistence harvest technologies to smaller boats making shorter trips (George and Bosworth 1988; SERAC 2021a, 2021b). Small vessels for commercial fishing, mainly hand trolling, along with 16- or 17-foot outboard motor skiffs, are now used extensively in the fall for hunting trips to destinations that are reached along the marine passages in all directions from Angoon (George and Bosworth 1988; SERAC 2021a, 2021b). A small skiff can negotiate intertidal areas while looking for deer. Also, skiffs may be pulled onto shore or anchored in shallow embayments while a hunting party walks along the beach or further inland. These hunting trips can be particularly important in November, as food security can often become an issue around this time (Grant and Sill 2017).

The use of smaller boats and the recent rise in fuel prices, however, has restricted the distances that many local hunters can travel to harvest deer and other subsistence resources (Grant and Sill 2017; SERAC 2021a, 2021b, 2023). Three of the four subsistence studies conducted by ADF&G researchers in Angoon have included a mapping component asking residents to specify the areas where they hunt, fish, and gather subsistence resources (Grant and Sill 2017). However, each study asked Angoon residents to consider different timeframes of subsistence use when specifying these areas: (1) all areas ever used for subsistence during the 1987 study; (2) all areas used for subsistence in the past 5 years during the 1996 study; (3) and all areas used for subsistence in the past year during the 2012 study (Grant and Sill 2017). As Grant and Sill (2017: 276-279) explained:

> It may be expected that the first two studies would show a larger harvest and use area than the 2012 study since households likely use more areas over multiple years than they use in just one year, which is what is seen when comparing the study years. Based on responses gathered when conducting the surveys, however, it appears unlikely that different mapping methods explain all the differences between the study years. The 2012 Angoon harvest areas are considerably smaller and are concentrated close to town, along shorelines, and in Mitchell Bay. During the surveys there were many comments made about the increasingly high cost of fuel limiting harvest activities and that the subsistence harvest had changed dramatically from past years…One factor

> likely influencing the [recent] contraction of search and harvest areas is the loss of commercial salmon permits. A local commercial fishing fleet not only is a source of capital to sustain subsistence harvesting activities, but it also provides a tremendous source of equipment – like boats capable of traveling long distances.

Residents of Angoon and similar communities in Unit 4 have noted that their increasing reliance upon smaller boats using limited fuel to navigate narrow embayments closer to home has made hunter competition and user conflict in these areas a much more significant issue (SERAC 2021b, 2023a, 2023b). Overall, approximately 80% of all recent deer harvests in Unit 4 have been made by boat-based hunters (Bethune 2022a). Though boat-based beach hunting is typically the most efficient method of deer harvest in Unit 4, it can be restricted by issues of access and competition (SERAC 2021b). Local knowledge attests that only one or two boats can hunt in narrow embayments without negatively affecting hunting success because access in some inlets is very limited and localized depletions of deer are possible (SERAC 2021b). Therefore, even a relatively small increase in hunting competition can seriously impact the effort and success rates of subsistence hunts (SERAC 2021b). As one Southeast Council member put it, "There's plenty of water, but there's not enough elbow room at the bar" (SERAC 2021b: 525). Another Unit 4 resident related the story of a friend who boated to a preferred deer hunting location with "all his hopes on ten gallons of gas" only to find three or four other boats with hunters already hunting there (SERAC 2021b: 367). Collectively, these sorts of issues have also made local hunting efforts more weather dependent (Grant and Sill 2017; SERAC 2021a, 2021b). As the Southeast Council member from Angoon noted,

> What you don't hear in the [recent hunter harvest and effort] data is the economy of Angoon. I mentioned earlier that everyone in Angoon had a permit hand troll [in years past]. We all fished halibut. It was a fun time, but that stuff isn't here anymore. So, the hunter effort is based on the price of gas [now]. For example, if I have five gallons of gas, I'm definitely not going to go out today and look for deer, because it's raining. Those things like that are missing from the equation (SERAC 2021b: 355).

A recent study of eight rural Alaskan communities in the Yukon Flats region quantified the significant impacts of rising fuel costs and depressed local economies among subsistence harvesters in greater detail than the subsistence study conducted in Angoon in 2012 (Brinkman et al. 2014). Overall, 81% of the subsistence harvesters participating in the Yukon Flats study noted that they had reduced the distance they traveled to conduct subsistence activities over the past ten years because of gasoline costs (Brinkman et al. 2014). Similarly, 89% of the study participants noted that they had reduced the number of yearly trips they took to conduct subsistence activities for the same reason (Brinkman et al. 2014). As the researchers explained:

> During the last ten years [2002 – 2012], the median distance traveled to perform subsistence decreased by 60%, and the median number of annual trips taken to perform subsistence decreased by 75%. The change in subsistence activity was similar across and within communities. Eighty-five percent of the people interviewed reported that they were making sacrifices with serious consequences, such as putting off paying monthly bills, to buy gasoline for subsistence activities.

> To adapt to high gasoline prices, most [study] participants said that they were using more efficient modes of transportation (69%), followed by more sharing of gasoline costs with family and friends (37%), and conducting more multipurpose subsistence trips (20%). With subsistence practices being critical to food security and cultural identity…our results suggest that unaffordable fuel has threatened social resilience [in this area] (Brinkman et al 2014: 18).

Likewise, as the Southeast Council member from Angoon noted at a recent Board meeting, "sometimes it's [a matter of] choosing between buying gas to go hunting or keeping your lights on" (FSB 2023: 332). Consequently, recent reductions in deer hunters, hunter days, and harvests reported by Angoon residents during the most recent five-year reporting period are at least partially related to the impact of rising fuel prices in an area with declining commercial fisheries employment and income earning opportunities (see **Table 8**). Reductions in the number and distance of trips that Angoon residents can afford to take to harvest subsistence resources would almost certainly contribute to issues of user conflict, competition, and food insecurity in the proposal area. Many Angoon residents focus their subsistence activities within a smaller core area now, mainly shoreline around the community (OSM 2022a). As the Council member explained, "We've learned from our father and our grandfathers, that we hunt these areas because there's always somewhere to hide from the weather in a small boat, and [these areas] have become important to us" (SERAC 2021b: 386). Similarly, "The [local] people that can afford to hunt away from Angoon do that and leave it [Angoon] for the guys that are hunting in 14-foot Lunds with 9-horsepower motors on them. We do that because the price of gas is six dollars a gallon [here]" (SERAC 2021b: 335, Grant and Sill 2017). However, "[Non-local hunters] can go into a bay [near Angoon] and eliminate all the deer in that bay. You don't see that in the data" (SERAC 20221b: 422).

Available harvest and effort data also does not specifically account for the impact of declining, ageing populations in communities like Angoon (SERAC 2021b). It would be reasonable to expect that a community's harvests, total number of hunters, and total days hunted would decrease as their population decreases. As the Southeast Council member from Angoon explained, "My interpretation of that [hunter effort] data is that there's less of an effort [by FQSUs] because there's less of a population here [in Angoon]" (SERAC 2021b: 384). However, the number of reported Angoon hunters as a percentage of overall community population has slightly increased for the years (2000, 2010, 2020) where this data exists (see **Tables 3** and **8**). Still, an ageing population of hunters might be more reliant upon beach and low elevation hunts in an otherwise steep and rugged landscape, as described below. Declining community populations, however, do not explain local perceptions of increased hunting pressure. Echoing the sentiments of several other testimonies, one Unit 4 resident noted:

> I kind of live for deer and I wasn't able to get any last year. I'm getting too old to climb up to the top of the mountain so, you know, I do rely for them to be on the beaches. Anyway, last year I wasn't able to score any. So, I've been saying that the [deer] population, I don't know, it seems to be decreasing, if you ask me, and there's more pressure on them all the time (SERAC 2021b: 172).

However, some federally qualified and non-federally qualified users have suggested that observed declines in the local deer populations could be related to recent mild winters, which resulted in deer

being spread-out through the forests rather than concentrated and easily visible on beaches. A resident of Juneau explained:

> I was out there [Unit 4] for six weeks last year…and you know, it was cold. It was cold and there wasn't much snow last year. So, if you wanted to get deer, you had to go into the woods. It's as simple as that… So, I thought we were pretty successful…When you did get into the woods and tried to walk around up in there, you were crunching through the little bit of frozen snow that was there…but there was a lot of sign [of deer] … Very seldom did we run the beaches. I mean that's, to me, not really hunting, but I understand for folks who are a little older. (SERAC 2021b: 174).

As this statement by the Juneau hunter alludes, hunting for some NFQUs is not just about the efficiency with which one can harvest a deer for food; it is also about the experience and sporting nature of the hunt. Likewise, some residents of the smaller communities in Unit 4 believe that non-local, sport-oriented, and/or younger hunters should focus their efforts on alpine areas because alpine hunting is a more recreational pursuit that is less efficient than hunting in lower elevations, or along shorelines (SERAC 2021a, SERAC 2021b). As one resident explained, "You know, people that come in from…that don't know the area, they're just doing it [hunting] for fun. They don't have any idea what subsistence is about" (SERAC 2021a: 201). Similarly, the Council member from Angoon noted, "We don't do it [hunting] for fun…. everything goes in our freezer," but then "you see a big boat towing several other boats and they're just out having a good time" (SERAC 2021a: 195). There is also a local perception that non-local hunters, and particularly unguided hunters, often waste or improperly process much of the deer that they harvest (SERAC 2021a). As the Council member from Angoon explained, "We run into a problem where people from Juneau come out and then they just take part of the deer and not the whole deer, you know, and I always say, whenever we strip a deer, we always boil…even boil the bones, just for something to eat. So, the subsistence way of life is that way, you know, use as much as possible" (SERAC 2021a: 201).

For some FQSUs, there are also concerns that non-local hunters impact the success of local hunters in ways that go beyond competition and crowding. Some FQSUs assert that non-local hunters, including hunters primarily seeking bear, often shoot at deer and miss, causing the deer to become more skittish and wary of all hunting presence. As the Council member from Angoon noted, "You used to be able to drive up to a deer, get out of the boat within reasonable range and take the deer. Now, you have to stop 400 or 500 yards away" (SERAC 2021a: 59), and "this is something my dad taught me, his dad taught him, and my mother's father taught me. If you shoot at a deer [and miss], you're never going to see that deer again. That's the nature of deer" (SERAC 2021b: 397).

Though prey switching among subsistence users has been a recorded method for coping with issues of competition and fluctuations in the availability of primary subsistence resources, a recent study among nineteen rural communities in the Yukon River drainage suggests that such strategies often do not provide substantial compensation for declining harvests of primary subsistence resources (Hansen et al. 2013). The overall utility of prey switching may be complicated by policy restrictions, the increased time and money required to harvest sufficient amounts of secondary resources, and/or simultaneous declines

in secondary resources (Hansen et al. 2013). In Angoon, prey switching strategies are complicated by declines in salmon and marine invertebrate populations, changing and less predictable migration patterns of subsistence bird species, changing and less predictable growth patterns and ripening periods of berries and other subsistence vegetation, changing and increasingly severe weather patterns making hunting generally more difficult, and Federal and State harvest seasons that need to become more flexible to account for the impacts of these changes (see Grant and Sill 2017: 279). Furthermore, deer were the only large land mammal reported harvested by Angoon households in the 2012 ADF&G subsistence study (Grant and Sill 2017: 250).

Food Security and Contemporary Economic Conditions

During the most recent subsistence study conducted by ADF&G in 2012, nearly half (42%) of the households in Angoon were considered to be experiencing low or very low food security (Grant and Sill 2017). The percentage of food insecure households in Angoon (42%) was roughly three times higher than the average for the state of Alaska (12%), and the nation overall (15%) (Grant and Sill 2017). Angoon households experiencing low food security (31%) reported reduced quality, variety, or desirability of their diet, whereas Angoon households experiencing very low food security (11%) reported multiple instances of disrupted eating patterns and reduced food intake (Grant and Sill 2017). The rate of very low food security experienced by Angoon households was greater than that experienced in any of the other four rural, Southeast Alaskan communities (Haines, Hoonah, Whale Pass, and Hydaburg) surveyed in the ADF&G study (Grant and Sill 2017). Significantly, deer was the subsistence resource that Angoon households (41%) most reported needing more of during this 2012 study (Grant and Sill 2017: 271). Approximately 47% of these households noted that this lack of deer had a “major impact” on their households, while an additional (16%) noted that the impact was “severe” (Grant and Sill 2017: 262).

Overall, 52% of Angoon households reported worrying about having enough food, 73% indicated they lacked the resources necessary to get either store-bought or subsistence foods, and 54% noted that their food did not last in 2012 (Grant and Sill 2017). Food insecure conditions increased significantly during the late fall and winter months in Angoon, with the highest levels of food insecurity typically occurring in November (Grant and Sill 2017). As Grant and Sill noted (2017: 214), “with less than one-half of the employed adults working full-time and 38% employed year-round, the presumably highly varied employment status of households throughout the year combined with the seasonal availability of wild foods likely affects food security.” In the winter months there are fewer seasonal jobs available and subsistence foods are not as plentiful (Grant and Sill 2017). Furthermore, “Winter harvest activities are limited by short daylight hours, harsh weather conditions (cold temperatures, snow, and wind), stormy sea conditions, and many species have migrated out of Southeast Alaska. The more severe winter conditions require more equipment to harvest wild resources; therefore, winter harvest activities are generally more expensive" (Grant and Sill 2017: 230). Consequently, food insecurity increases (Grant and Sill 2017). These findings could also indicate that hunting conditions and similar subsistence harvesting activities have become more difficult in the Angoon area in recent years. Still, this study underscores the importance of successful deer hunting in November for FQSUs in the area, as deer have consistently ranked as the first or second resource in terms of bulk contribution to subsistence diets in

Angoon during previous study years (see **Table 4**). In fact, November has been the month when the majority of deer harvest and deer harvest effort has taken place throughout Unit 4 in recent years (see **Table 5**). This trend is consistent for both FQSUs and NFQUs (**Table 5**).

Currently, both FQSUs and resident NFQUs may harvest six deer in the area of Angoon (Unit 4 Remainder). The state deer season in Unit 4 Remainder runs from August 1 through December 31, while the Federal deer season runs from August 1 through January 31. The ability for FQSUs to hunt in January appears to be useful in times of necessity or opportunistic encounters, but it does not appear to be a preferred hunting period due to the relatively poor condition of deer and the severity of weather typically associated with this time of the season (**Table 5**, SERAC 2023b). As ADF&G notes in their comments on this proposal, January was the least hunted month for Angoon residents, accounting for approximately 4% of Angoon residents' reported hunting days and 3% of their deer harvests from 2013 to 2022.

Table 5. Percentage of Unit 4 Deer Harvest by Month and User Type, 2000-2019 (ADF&G 2021).

Hunter type	August	September	October	**November**	December	January
Federally qualified	6%	8%	16%	**40%**	23%	8%
Non-Federally qualified	5%	6%	13%	**53%**	22%	0%
Overall	6%	7%	15%	**45%**	22%	5%

In 2020, there were 357 individuals living in 154 households in Angoon (US Census 2020a). The median age of Angoon residents was approximately 46 at this time, about ten years older than the median age for all Alaskan residents (US Census 2020a). Angoon also had a significantly larger proportion of residents 65 and older when compared to the median figure for the entire state (US Census 2020a). The median household income in Angoon was $44,167 in 2020, approximately $34,000 less than the median household income for Alaska overall (US Census 2020a). The employment rate in Angoon was roughly 47%, about 10% lower than the median employment rate across the state (US Census 2020a). The primary employment sectors in Angoon were education, healthcare, and social work (38%), and recreation and the service industry (22%). Agriculture, forestry, and fishing only employed about 5% of the population in 2020 (US Census 2020a). The poverty rate for families in Angoon was approximately 20% in 2020, and about 37% of Angoon households qualified for the Supplemental Nutrition Assistance Program (SNAP) (see **Table 6**). This socioeconomic information for Angoon in 2020 is compared to that of the previous two US Census periods in **Table 6** below.

Table 6. Angoon Socioeconomic Statistics for 2000, 2010, and 2020 (US Census 2000, 2010, 2020a, 2020b)

Year	Population	Median Age	Percent of Population 65+	Median Household Income	Employment Rate	Family Poverty Rate	Households Qualified for SNAP
2000	572	34	6%	$29,861	50%	27%	n/a
2010	459	33	10%	$23,350	46%	50%	47%
2020	357	46	19%	$44,167	47%	20%	37%

Harvest History

Hunter harvest and effort reporting is another one of the suite of methods that managers use in combination to monitor deer population trends in Unit 4. As Bethune (2020: 15) notes, hunter harvest trends, particularly those observed at larger scales, typically reflect current deer population levels. However, hunter self-reported harvest and effort data should be analyzed cautiously, as reporting rates can be less than ideal (Bethune 2020). This is particularly the case in smaller rural communities, like Angoon, where reporting rates are often much lower than elsewhere, sometimes less than 30% (Bethune 2020, SERAC 2010). During the subsistence study conducted by ADF&G researchers in Angoon in 2012, "strong concerns were voiced about how the data collected during the survey might be used, and particularly how it might be used against residents and hamper their subsistence harvesting activities" (Grant and Sill 2017: 280; see also SERAC 2023a). These types of concerns could also be a reason for low or inaccurate deer harvest reporting in the community. Resource managers typically call hunters to ask about their hunting efforts and harvests to try to achieve a 60% reporting rate when response rates are low. However, to account for hunters who do not report, data are proportionally expanded by community size (Bethune 2020). Therefore, "in small communities with low reporting rates, expanded data may be based on the reports of only a handful of hunters, resulting in a good deal of uncertainty about the [accuracy of] expanded data" (Bethune 2020: 16).

Additionally, there are several other reasons why harvest estimates often do not accurately represent the hunting efforts and success rates of residents in small, rural communities. First, residents of rural communities often under-report their harvests because of differences in their interpretations of survey questions. This is a common phenomenon with survey questions, in which the particular lived experiences of respondents lead them to interpret questions differently than intended. For example, calculations of hunter effort and success may be misleading because subsistence users often only document their successful hunts (SERAC 2021b). As one Unit 4 resident explained, "I question this [harvest success] information. When I complete a deer hunter survey, I only list actual deer harvested, and it is always a one-day hunt. I never list the number of times I hunt without success, and it may be three, four, or five times before I shoot a deer" (SERAC 2021b: 73). Another resident noted, "It's tough to sit here and listen to someone who's looking at data that was given to them and not actually living in Angoon and sees it for himself or lives the life of the people who live here" (SERAC 2021b: 315). Though harvest reports and comprehensive subsistence survey data are often the only sources of quantitative information available on the harvest and use of wild resources by residents of small rural communities in Alaska, it is important to consider this type of quantitative information holistically, in combination with qualitative testimony of local users' observations and traditional ecological knowledge (SERAC 2021b).

ADF&G estimated harvest data from 2000 through 2021 (ADF&G 2022c, ADF&G 2021) were used to try to gain some understanding of the deer harvest patterns and trends of FQSUs and NFQUs in the proposal area. Likewise, hunter effort was also measured as a function of the overall number of hunters and hunter-days. It should be noted that these measurements of hunter effort do not specifically account for potential confounding factors such as community population decline, weather, the price of gas, or hunter competition. Hunter harvest and effort measurements were grouped by Wildlife Analysis Area (WAA), which roughly correspond to major watersheds or other distinct geographic areas (see **Figure**

2). Since effort was calculated by WAA, individual hunters using multiple WAAs in a single regulatory year may have been counted multiple times and over-represented in these calculations.

Proximity to Angoon appears to be a key factor for residents when selecting deer hunting locations. According to the available data, from 2000 to 2021, approximately 39% of Angoon residents' reported deer harvests, and 42% of their reported hunting days took place within the WAAs covered by the proposal area (see **Table 7**). The Angoon Area (4042) and Hood Bay/Chaik (4055) WAAs accounted for almost all of these reported harvests and hunting days, while a relatively minimal amount of Angoon hunting effort and deer harvest took place within Whitewater Bay/Wilson Cove (4041). However, local knowledge attests that Angoon residents do regularly use the Whitewater Bay/Wilson Cove (WAA 4041) area for deer hunting (see Grant and Sill 2017: 252; SERAC 2023a). Angoon residents utilized the Pybus Bay (3939) and the Fishery/Thayer Creeks (4054) areas the most of any WAAs located outside the proposal area (**Table 7**). Still, both the Fishery/Thayer Creek (4054) and Pybus Bay (3939) WAAs are located adjacent to the proposal area. Additionally, the location of about 20% of the total harvest and 17% of the hunting days reported by Angoon residents during this time could not be determined from the information returned and is unknown (**Table 7**). It is possible that some of this unknown harvest and harvest effort may have also taken place within the proposal area. Regardless, the data supports previous statements from residents of Angoon that suggest that they primarily hunt in areas close to home.

Based on the reported data, an average of approximately 59 users hunted for 207 days, harvesting 94 deer within the proposal area each year from 2000 to 2021 (see **Table 8**). However, the total number of hunters, hunter days, and deer harvested in the proposal area by both FQSUs and NFQUs was variable between years (see **Table 8**). In most years, FQSUs harvested more deer from the proposal area due to the larger number of hunters. On average, roughly 45% of all hunters utilizing the proposal area each year were FQSUs from Angoon (**Table 8**). The second largest proportion of hunters each year were NFQUs (39%). Other FQSUs from communities outside Angoon typically composed about 16% of hunters in the proposal area each year (**Table 8**).

The available yearly data on reported hunter days and harvests within the proposal area shows similar trends between 2000 and 2021 (see **Table 8**). On average, Angoon residents were responsible for 49% of reported hunter days and 53% of reported harvests in the proposal area each year (**Table 8**). Other FQSUs were generally responsible for about 10% of reported hunter days and 16% of reported harvests (**Table 8**). NFQUs were responsible for about 41% of reported hunter days and 31% of reported harvests in the proposal area each year (**Table 8**). The average reported hunter effort and deer harvest by non-residents within the proposal area each year during this time-period was relatively minimal (ADF&G 2021). However, the location of approximately 28% of the reported hunter days, and 24% of the harvests by non-residents in Unit 4 could not be determined from the information returned and is unknown (ADF&G 2021). Generally, non-resident hunters compose a small amount of the total hunters in Unit 4, accounting for approximately 6% of all hunters during the 2016-2020 reporting period (Bethune 2022a), and about 5% all Unit 4 hunters during the 2011-2015 reporting period (Bethune 2020). As Bethune (2022a: 18) explains, "Unit 4 likely attracts fewer nonresident hunters because it is not known for producing large antlered bucks compared to places such as Kodiak or Prince of Wales Island."

It is important to note that the proportion of NFQU hunter effort and harvest within the proposal area increased fairly substantially over the two most recent reporting periods (2011-2015 & 2016-2020).

During this ten-year period, NFQUs accounted for an average of 48% of all reported hunters, 57% of all reported hunter days, and 47% of all reported harvests taken from the proposal area each year (**Table 8**). This change also corresponded with a substantial decline in the human population of Angoon, a substantial decline in the average number of hunter days and harvests reported by Angoon residents, but a relatively small reduction in the average number of reported Angoon hunters (see **Tables 3** & **8**).

Among the different user groups in this area, only NFQUs reported increases in average yearly hunters (+43% or +9 hunters), hunter days (+103% or +67 days), or harvests (+169% or +27 deer) between the 2001-2005 reporting period and the 2016-2020 reporting period (see **Table 8**). Perhaps most significantly, the average number of reported NFQU hunter days in the proposal area each year more than doubled between 2001-2010 (55 days) and 2011-2020 (114 days).

The overall number of deer reported harvested by FQSUs from Angoon has remained relatively stable in recent years, but a larger proportion has been taken from outside the proposal area or from unknown locations (OSM 2022a). Between 2013 and 2019, a substantial amount of the reported Angoon harvest shifted out of the proposal area (OSM 2022a). This change corresponded with a larger proportion of NFQUs, NFQU hunter days, and NFQU harvests taking place within the proposal area around the same time (see **Table 8**). At a recent Southeast Council meeting, the Council member from Angoon suggested that this trend was the result of increasing competition in and around the community:

> On the one hand he [the analyst] says there's enough deer here [in the WP22-07 Proposal Area for Angoon] to not warrant a conservation concern, but on the other hand, his data shows him that we have to go hunt somewhere else. Does that data say why we have to go hunt somewhere else? Is it possible we're hunting somewhere else because there's so much competition on this side of the island [near Angoon] that we have to go hunt somewhere else? Does the data show that? Traditional knowledge needs to be implemented at some point. I'd like to see the data that shows that all this deer that's supposed to be here is here and where that information comes from (SERAC 2021b: 315).

In 2020 and 2021, however, the majority of deer harvests by FQSUs from Angoon took place within the proposal area again, as the proportion of NFQUs, NFQU hunter days, and NFQU harvests decreased (ADF&G 2021). Yet, despite reports of favorable hunting conditions throughout Unit 4, the average number of days hunted per deer harvested increased for both Angoon users and NFQUs in the proposal area in 2020 and 2021 (OSM 2022a). This may suggest that deer hunting has been more difficult in the Angoon area during recent years and that competition exacerbates this issue.

Though NFQUs composed a significant proportion of the hunters utilizing the proposal area between 2000 and 2021, the proposal area accounted for a relatively small amount of NFQUs overall hunting efforts and harvests within Unit 4 as a whole (ADF&G 2021, 2022c). Approximately 1.5% (509 users) of all NFQUs reported hunting in the proposal area from 2000 – 2021. NFQUs spent about 1.6% (1,865 days) of all their hunting days in Unit 4 within the proposal area during this same time (ADF&G 2021, 2022c). Likewise, roughly 1.8% (630 deer) of all deer harvested by NFQUs within Unit 4 from 2000 – 2021 were taken from the proposal area (ADF&G 2021, 2022c). NFQUs tended to focus their deer hunting efforts in the northern areas of Admiralty Island closest to Juneau during this time (ADF&G 2021, 2022c). WAAs 3835, 3836, and 4150 on northern Admiralty Island accounted for approximately

23% of NFQU's overall hunter days and harvests within Unit 4 from 2000 – 2021 (ADF&G 2021, 2022c). Approximately 32% of all NFQUs hunted in at least one of these WAAs during this period (ADF&G 2021, 2022c). These WAAs on northern Admiralty Island would remain open during the proposed closure.

Table 7. Distribution of Unit 4 Deer Hunting Effort and Harvest by Angoon Residents by Wildlife Analysis Area (WAA), 2000-2021 (ADF&G 2021, 2022c).

WAAs within Proposal Area	Hunter Days	Total Harvest	Percent Days	Percent Harvest
4041 WHITEWATER BAY, WILSON COVE	38	81	1%	3%
4042 ANGOON AREA	1049	590	20%	21%
4055 HOOD BAY, CHAIK BAY DRAINAGES	1161	419	21%	15%
Total within Proposal Area	2248	1090	42%	39%
WAAs Outside of Proposal Area	**Hunter Days**	**Total Harvest**	**Percent Days**	**Percent Harvest**
3308 KOOK LAKE, SITKOH BAY, FALSE IS.	190	108	4%	4%
3315 CATHERINE ISLAND, LAKE EVA, HANUS BAY	160	73	3%	3%
3417 WEST COAST CHICHAGOF	23	18	<1%	<1%
3525 FRESHWATER BAY DRAINAGES	34	13	<1%	<1%
3526 NORTH SHORE TENAKEE INLET	32	0	<1%	0%
3551 WHITESTONE HARBOR, FALSE BAY DRAINAGES	89	7	2%	<1%
3731 KELP BAY-TAKATZ BAY	16	9	<1%	<1%
WAAs Outside of Proposal Area	**Hunter Days**	**Total Harvest**	**Percent Days**	**Percent Harvest**
3733 WHALE BAY DRAINAGES, WILDERNESS COAST	5	5	<1%	<1%
3835 NORTHERN MANSFIELD PENIN.	6	6	<1%	<1%
3837 WHEELER, GREENS CREEKS DRAINAGES	25	25	<1%	1%
3939 PYBUS BAY DRAINAGES	624	373	12%	13%
3940 PT. GARDNER, ELIZA HARBOR	54	34	1%	1%
4043 CENTRAL ADMIRALTY LAKES	52	23	1%	1%
4044 SHEE-ATIKA DRAINAGES	66	23	1%	1%
4054 FISHERY, THAYER CREEKS	605	365	11%	13%
4145 TIEDEMAN IS.-MOLE HARBOR AREA	70	31	1%	1%
4149 EAST SIDE GLASS PENIN.	4	0	<1%	0%
4150 GRAND IS., OLIVER INLET, STINK CREEK	21	8	<1%	<1%
4222 PT. ADOLPHUS, MUD BAY AREA	53	26	1%	1%
Total Outside Proposal Area	2126	1148	40%	41%
Total (Known Harvest Area)	4375	2237	83%	80%
Unknown Harvest Area	912	565	17%	20%

Table 8. Estimated hunting effort and harvest by user group within the proposal area during recent five-year reporting periods (ADF&G 2021).

Year	Angoon Hunters	Angoon Hunter Days	Angoon Harvests	Other FQSU Hunters	Other FQSU Hunter Days	Other FQSU Harvests	NFQU Hunters	NFQU Hunter Days	NFQU Harvests	Total Hunters	Total Hunter Days	Total Harvests
2000	30	126	74	5	5	1	25	81	22	60	212	97
2001	37	267	87	8	8	8	24	92	15	69	367	110
2002	26	118	39	7	39	33	20	70	20	53	227	92
2003	12	12	12	11	5	24	5	24	5	28	41	41
2004	11	21	21	18	45	40	28	85	19	57	151	80
2005	67	168	143	9	40	37	26	56	23	102	264	203
5 Year Average	**31**	**117**	**60**	**11**	**27**	**28**	**21**	**65**	**16**	**62**	**210**	**105**
2006	59	338	144	6	6	6	21	46	26	86	390	176
2007	25	50	8	13	16	16	19	68	15	57	134	39
2008	13	177	76	11	30	5	6	15	8	30	222	89
2009	11	45	23	12	12	6	10	19	0	33	76	29
2010	32	88	88	15	23	15	18	79	48	65	190	151
5 Year Average	**28**	**140**	**68**	**11**	**17**	**10**	**15**	**45**	**19**	**54**	**202**	**97**
2011	36	145	91	5	5	6	18	48	38	59	198	135
2012	32	73	51	7	18	11	23	72	27	62	163	89
2013	13	13	7	8	21	18	29	83	28	50	117	53
2014	16	38	0	5	10	10	31	86	40	52	134	50
2015	14	14	0	11	16	14	46	188	60	71	218	74
5 Year Average	**22**	**57**	**30**	**7**	**14**	**12**	**29**	**95**	**39**	**59**	**166**	**80**
2016	43	159	69	11	26	12	43	173	60	97	358	141
2017	15	15	15	4	16	6	25	128	43	44	159	64
2018	8	8	8	10	26	16	33	147	52	51	181	76
2019	23	45	36	9	47	23	31	113	34	63	205	93
2020	34	140	41	13	18	13	16	97	27	63	255	81
5 Year Average	**25**	**73**	**34**	**9**	**27**	**14**	**30**	**132**	**43**	**64**	**232**	**91**
2021	31	188	58	9	12	11	12	97	24	52	297	93
Overall Average	**27**	**102**	**50**	**9**	**20**	**15**	**23**	**85**	**29**	**59**	**207**	**94**

Other Alternatives Considered

Harvest limit reduction: The current proposal (WP24-04) responds to critiques of a previous, modified version of WP22-07 where a proposed harvest limit reduction to two male deer for NFQUs was not considered sufficient to provide for a meaningful conservation benefit or substantially improve the success rates of FQSUs (SERAC 2021b). Recently reported harvest data shows that relatively few NFQUs currently take their full harvest limit (OSM 2022a). A harvest limit reduction for NFQUs would probably not substantially reduce issues of competition and crowding in and around the proposal area during the proposed closure period.

Reduce extent of closure area and/or period of closure: The current proposal represents the outcome of significant consideration of this option. The current proposal, WP24-04, reduces the size of the closure area previously proposed under WP22-07 by roughly 50%. The proponents note that they intend to limit the proposed closure to the WAAs most hunted by Angoon residents (**Table 7**). The current proposal also reduces the length of the closure previously proposed under WP22-07 by approximately nine weeks, to focus on the period most important to local subsistence users. At its fall 2023 meeting, the Southeast Council also voted to remove WAA 4041 from the proposed closure area and reduce the proposed closure period from November 1-15 to November 1-10 (SERAC 2023a). These further reductions in proposed closure size and length could help minimize competition and conflicts between user groups in Angoon's most heavily utilized deer hunting areas, while displacing fewer NFQUs.

Working Group: One alternative considered during previous deliberations on a similar proposal, WP22-07, was to establish a Unit 4 deer working group. This suggestion was mentioned by some Southeast Council members and public testifiers during the fall 2021 Southeast Council meeting (OSM 2022a). Developing a "Unit 4 deer management strategy," was also recommended multiple times during the fall 2021 Southeast Council meeting (OSM 2022a). It was suggested that this alternative would allow consideration of deer harvest and hunter competition issues in Unit 4 on a more holistic and longer timescale. It would also enable all alternatives to be considered and could help bring user groups together for discussion and compromise.

Since this time, a "North Unit 4 Deer Working Group" has been established under the guidance of the Hoonah Indian Association Environmental Programs (HIA Environmental 2023). The first meeting of this group was held on March 15, 2023. The stated goals for the group are to:

> (1) Complete annual community surveys on deer harvest and use by training people in the communities to do the work; (2) Understand if/how competition is impacting subsistence use of deer on north Chichagof; (3) Collect deer data through camera traps in overwintering areas to begin to get trend data for deer numbers; (4) Host meetings where managers, community members, and non-community members can discuss their deer harvest needs; and (5) Increase community understanding of how harvest reporting is used in management with the goal of increasing community reporting (HIA Environmental 2023).

Unfortunately, the focus on north Chichagof Island means that some of this work may not be as relevant to Admiralty Island, the Angoon community, and deliberations on this proposal. At the time that this analysis was submitted, HIA had not been able to conduct community surveys in Angoon.

Effects of the Proposal

The proponents have asserted that the continuation of subsistence and meaningful rural subsistence preference is under threat from increasing competition from NFQUs in and around Angoon. If the Board adopts this proposal, it will restrict NFQUs from hunting deer on a portion of southwestern Admiralty Island from November 1-15. This could potentially provide FQSUs in the area with an enhanced subsistence harvest opportunity, by reducing user competition and conflict during a period of peak hunter effort and harvest that is particularly important for a community that has regularly faced food security issues, particularly during the winter. The proponents have noted that competition can significantly restrict access to favored deer hunting sites located in narrow embayments. November is the month when the greatest amount of federally qualified and non-federally qualified hunter effort and harvest has taken place in Unit 4 in recent years. Weather conditions are typically favorable for hunting and meat processing, deer provide the highest quality and amount of meat, and deer are generally more susceptible to harvest during this time.

Adopting the proposed closure could lead to increased harvest effort by NFQUs before and after the closure period. The proposed closure could also lead to increased hunting pressure and user conflicts along beaches, as areas below the high tide line are State-managed lands. The proponents, however, note that beach hunting generally takes place above the high tide line in this area. The proposal will prevent NFQUs with local ties to the area from directly participating in deer hunting during the period of closure, but they may help in other ways such as with meat processing. Some people from Angoon and other rural communities in the southeast region move to Juneau for employment but return to these communities to participate in subsistence hunts with family and friends. As one Southeast Council member explained, “A lot of the young men and women that have moved away will come out when it’s [the season is] first opened so they can climb the mountain” (SERAC 2021: 385).

While deliberating similar proposals (WP22-07, -08, -09/10) during the previous wildlife cycle, some Southeast Council members expressed concern over the potential displacement of NFQUs to other parts of Unit 4 if these types of proposals were to be adopted. These Council members were particularly concerned about potential displacement creating similar problems elsewhere if all three deer proposals (WP22-07, -08, and -09/-10) under consideration at the time were to be adopted (SERAC 2021b). However, the size and length of the closure currently under consideration, WP24-04, is significantly smaller than the previous proposal (WP22-07). These reductions were made in an effort to optimize benefits to federally qualified subsistence users and mitigate impacts on NFQUs that might lead to displacement concerns. The proposed changes are not expected to impact the Unit 4 deer population.

OSM PRELIMINARY CONCLUSION

Oppose WP24-04

Justification

Deer have been and continue to be very important to local subsistence livelihoods and ways of life for FQSUs living in the Angoon area. Many residents of Angoon and similar Unit 4 communities have noted that they have had to change their deer hunting methods to focus their efforts closer to home, as it has become too expensive and dangerous to travel further without appropriate boats and fuel. Local knowledge attests to the fact that only a limited number of boats and users can hunt in narrow bays and other preferred locations due to issues of access and resource competition in these areas. Residents of Angoon and similar communities have also noted that deer populations within Unit 4 may not be tracked at a fine enough scale to consistently capture localized depletions that exacerbate issues of competition and user conflict. Residents have also explained that hunter effort and harvest reporting tend to underestimate the amount of hunting effort taking place, and overestimate hunting success rates. There is data presented in this analysis that supports these arguments, suggesting that rates of competition for deer in the proposal area have increased in recent years and that this may be impacting the success and efficiency of Angoon residents who have had to focus their deer hunting efforts closer to home.

However, it is still not clear that the current levels of competition created by NFQUs in the proposal area pose the type of threat to the continuation of subsistence that would justify a closure to non-federally qualified users. There may be a better compromise available to address the proponents' concerns without enacting a closure to non-federally qualified users. A closure in the proposal area may also have the unintended consequence of promoting increased hunting of the beaches below the mean high tide line by NFQUs, as the area of the beach located below the mean high tide mark is state-managed land and would remain open during the proposed closure period. The proponents, however, note that beach hunting generally takes place after the proposed closure period and above the high tide line in this area. Adopting this proposal would also prevent NFQUs with local ties to the area from directly participating in deer hunting with local family and friends during the period of closure.

Interpretations of the information presented in this analysis are also complicated by a number of interrelated issues. Recent mild winters in the area may have resulted in fewer deer being easily visible on beaches, giving the appearance of localized declines in the deer population and/or increased competition for deer. There are limitations in the hunter harvest and effort reporting framework, as well as the regularity and reliability of reported data. Recent human population declines in communities like Angoon exacerbate issues with harvest and effort analyses, as population declines may be misinterpreted as a lack of hunting effort when compared to the harvest and effort data compiled for previous years. Overall, the Office of Subsistence Management feels that more information is still needed from a greater sample of the local population to determine whether a closure to NFQUs is necessary, and exactly where that closure should be located. OSM hopes to receive this type of information through additional meetings of the Southeast Council and the North Unit 4 Deer Working Group.

ANALYSIS ADDENDUM

OSM CONCLUSION

Support WP24-04 **with modification** to remove Wildlife Analysis Area 4041 from the proposed closure area and reduce the proposed closure period from November 1-15 to November 1-10 (see **Figure 4**). The modified regulation should read:

Unit 4 - Deer

Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31.	*Aug. 1 – Jan. 31*
Federal public lands of Admiralty Island draining into Chatham Strait south of the Thayer Creek drainage and north of Woody Point but excluding the Hasselborg Lake and Hasselborg Creek drainages are closed to deer hunting Nov. 1-10, except by federally qualified subsistence users hunting under these regulations.	

Justification

Deer have been and continue to be very important to local subsistence livelihoods and ways of life for FQSUs living in the Angoon area. Deer have consistently ranked as the first or second resource in terms of bulk contribution to subsistence diets in Angoon during previous studies conducted by ADF&G researchers. However, Angoon households reported substantial levels of food insecurity during the most recent subsistence study conducted by ADF&G, and deer were the subsistence resource that Angoon households most reported needing more of during this study. Reported simultaneous declines in other key subsistence resources, changing and increasingly severe weather patterns, economic declines coupled with rising fuel prices, and policy restrictions make it difficult to compensate for increased competition for deer in the proposal area.

There is qualitative and quantitative data that supports residents' claim that competition with non-locals has been threatening the continuation of subsistence uses of deer, and that a limited closure to non-federally qualified users is necessary to continue these uses per §815(3) of ANILCA. First, residents of Angoon have noted that because of declines in the commercial fishing industry and associated economic issues, they have had to change their deer hunting methods to focus their hunting efforts in areas closer to home, as it has become too expensive and dangerous to travel further without appropriate boats and fuel. This issue has also been documented in the most recent subsistence study conducted by ADF&G researchers in Angoon. Local knowledge attests to the fact that only a limited number of boats and users can hunt in narrow bays and other preferred locations due to issues of access and resource competition in these areas. Testimonies suggest that non-locals, who often travel from greater distances in better boats that those in Angoon, will fill these local bays, preventing locals from accessing them.

Second, residents of Angoon have also noted localized depletions of deer in these preferred hunting areas, which exacerbate issues of user competition and conflict. The deer populations within Unit 4 may

not be tracked at a fine enough scale to consistently capture these issues. Third, residents have also explained that their difficulties in harvesting deer are not well represented in the quantitative data collected on deer harvests and hunter effort. Residents have noted that hunter effort and harvest reporting tend to underestimate the amount of hunting effort taking place, and overestimate hunting success rates. Still, the quantitative data presented in this analysis shows that the number of days hunted by NFQUs in the proposal area has increased substantially over the past ten years, indicating that rates of competition for deer in the proposal area have increased in recent years. This supports the proponents' claims that competition is impacting the success and efficiency of Angoon residents who have had to focus their deer hunting efforts closer to home.

The OSM modification would increase subsistence harvest opportunity for FQSUs in the Angoon area by allowing for a ten-day period where residents could hunt in their most heavily utilized areas closest to home, during a very important time in the local deer harvest season, without potential competition from NFQUs. Though the ability of Angoon residents and other FQSUs to harvest deer in the month of January provides a degree of Federal subsistence priority in this area, January does not appear to be a preferred time for deer harvesting due to the often-poor condition of deer and severity of weather at this time in the season.

NFQUs would still maintain the ability to hunt the other 83% of Admiralty Island during this ten-day closure, including those areas of northern Admiralty Island that appear to be most important to Juneau based deer hunters. Excluding WAA 4041 from the proposed closure area may be appropriate because it appears to account for less Angoon hunter effort than WAAs 4042 and 4055, and reducing the size of the proposed closure area will reduce the potential impact on NFQUs. Reducing the length of the proposed closure period to ten-days will also reduce the potential impact on NFQUs.

Overall, this modification is expected to minimally impact NFQUs due to its short duration and because, over the past twenty-two years of data analyzed for this proposal, an average of less than 2% of all NFQUs in Unit 4 have reported hunting deer within the proposal area. However, the modification will have disproportionate benefits for Angoon residents who, as previously stated, are experiencing high rates of food insecurity as well as increasing competition from NFQUs in preferred deer hunting locations and cannot afford to travel far from home or spend long periods of time unsuccessfully hunting deer.

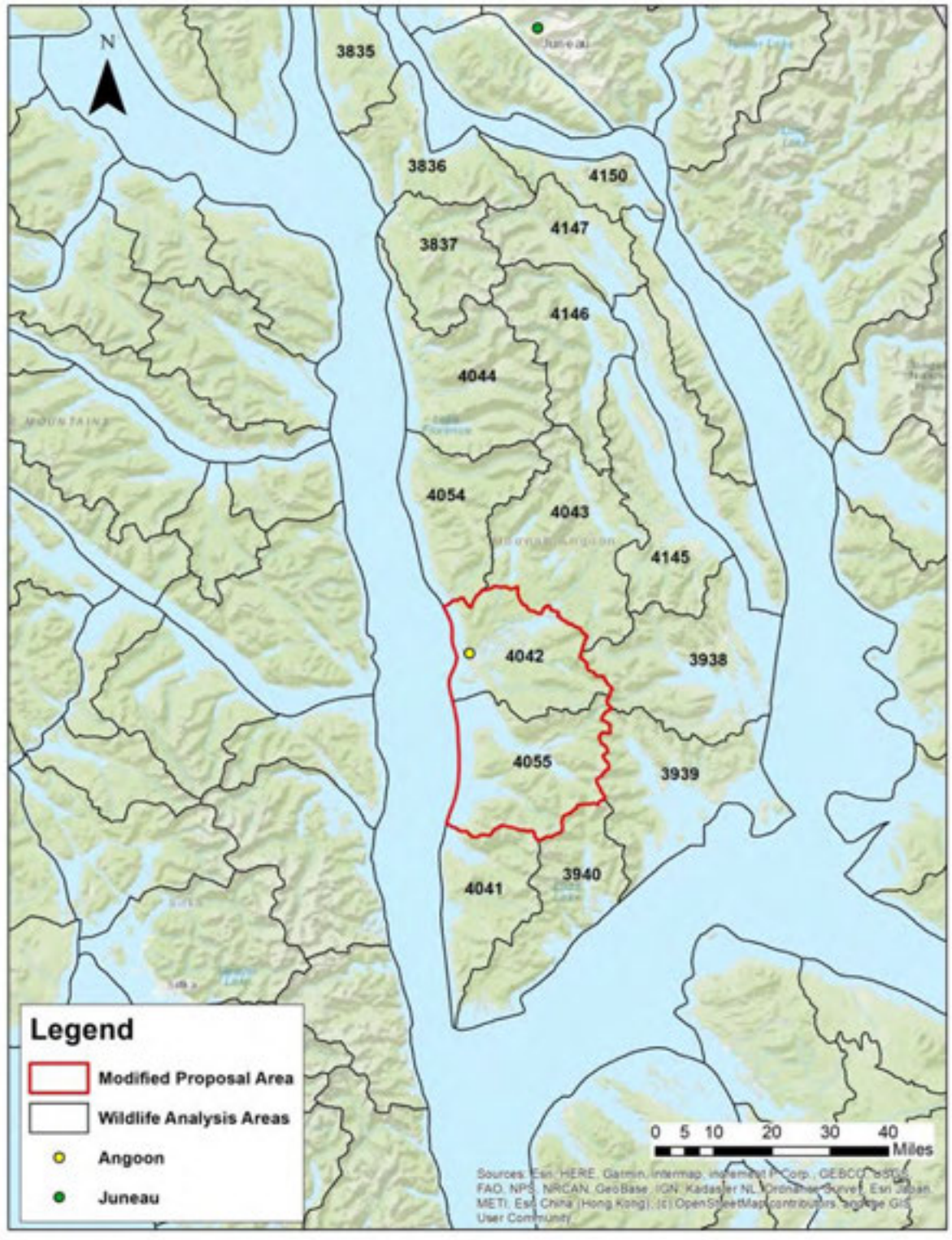

Figure 4. OSM and the Southeast Council's Modified Proposal Area in Relation to Angoon and Wildlife Analysis Areas on Admiralty Island (For informational purposes only).

LITERATURE CITED

ADCCED (Alaska Department of Commerce, Community, and Economic Development). 2023. Community database online. https://alaska-economic-data-dcced.hub.arcgis.com/apps/angoon-community-storymap/explore, retrieved April 6, 2023. Division of Community and Regional Affairs. Juneau, AK.

ADF&G. 2023a. Alaska Board of Game Preliminary Actions on Proposals. Southeast Region Meeting. January 20-24, 2023. http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2022-2023/se/pre-summary_1-23-23.pdf.

ADF&G. 2023b. Alaska Department of Fish and Game Comments on Wildlife Proposal WP24-04. Anchorage, AK.

ADF&G. 2023c. Community Subsistence Information System, online database. http://www.adfg.alaska.gov/sb/CSIS/index.cfm?ADFG=harvInfo.harvestCommSelComm, retrieved April 5, 2023. Division of Subsistence. Anchorage, AK.

ADF&G, Board of Game. 2022a. 2022-2023 Proposal Book, Southeast Region. https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2022-2023/proposals/se_all.pdf, retrieved September 13, 2022.

ADF&G. 2022b. Sitka black-tailed deer hunting in Alaska: life history. http://www.adfg.alaska.gov/index.cfm?adfg=deerhunting.main), retrieved August 31, 2022. Anchorage, AK.

ADF&G. 2022c. 2000-2021 Unit 4 deer by community and WAA. Microcomputer database, updated September 2022.

ADF&G. 2021. 2000-2019 Unit 4 deer by community and WAA. Microcomputer database, updated May 2021.

ADF&G. 2005-2006. Alaska Wildlife Harvest Summary 2005 – 2006. Alaska Department of Fish and Game, Division of Wildlife Conservation. https://www.adfg.alaska.gov/index.cfm?adfg=librarypublications.wildlifemanagement#deer, retrieved August 10, 2023.

ADF&G. 2006-2007. Alaska Wildlife Harvest Summary 2006 – 2007. Alaska Department of Fish and Game, Division of Wildlife Conservation. https://www.adfg.alaska.gov/index.cfm?adfg=librarypublications.wildlifemanagement#deer, retrieved August 10, 2023.

Alaska Department of Labor and Workforce Development (ADLWD). 2021. Alaska Migration Data. https://live.laborstats.alaska.gov/pop/migration.html. Retrieved July 21, 2021.

Bethune, S.W. 2022a. Deer management report and plan, Game Management Unit 4: Report period 1 July 2016–30 June 2016 and plan period 1 July 2016–30 June 2021. ADF&G, Species Management Report and Plan ADF&G/DWC/SMR&P-2022-27. Juneau, AK.

Bethune, S.W. 2022b. Spring Deer Surveys Unit 4. Memorandum dated May 3, 2022. ADF&G. Juneau, AK. 3 pages.

Bethune, S. W. 2020. Deer management report and plan, Game Management Unit 4: Report period 1 July 2011–30 June 2021 and plan period 1 July 2021–30 June 2026. ADF&G, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-5. Juneau, AK.

Brinkman, T., K.B. Maracle, J. Kelly, M. Vandyke, A. Firmin, and A. Springsteen. 2014. Impact of fuel costs on high-latitude subsistence activities. Ecology and Society 19(4): 18-26.

Brinkman, T.J., D.K. Person, W. Smith, F.S. Chapin III, K. McCoy, M. Leonawicz, and K.J. Hundertmark. 2013. Using DNA to test the utility of pellet-group counts as an index of deer counts. Wildlife Society Bulletin 37(2): 444-450.

Brinkman, T. J., D. K. Person, F. S. Chapin III, W. Smith, and K. J. Hundertmark. 2011. Estimating abundance of Sitka black-tailed deer using DNA from fecal pellets. Journal of Wildlife Management 75(1): 232–242.

Brinkman, T.J., T. Chapin, G. Kofinas, and D.K. Person. 2009. Linking hunter knowledge with forest change to understand changing deer harvest opportunities in intensively logged landscapes. Ecology and Society 14(1): 36-52.

de Laguna, F. 1960. The story of a Tlingit community: a problem in the relationship between archeological, ethnological, and historical methods. Smithsonian Institution, Bureau of American Ethology Bulletin 172. U.S. Government Printing Office, Washington, DC.

FSB. 2023. Transcripts of the Federal Subsistence Board proceedings. January 31, 2023 – February 3, 2023. Office of Subsistence Management, USFWS. Anchorage, AK.

FSB. 2022. Transcripts of the Federal Subsistence Board proceedings. April 12-15, 2022. Office of Subsistence Management, USFWS. Anchorage, AK.

Garfield, V.E. 1947. Historical Aspects of Tlingit Clans in Angoon, Alaska. American Anthropologist. 49(3): 438-452.

George, G.D. and M.A. Kookesh. 1982. Angoon deer hunting, 1982. ADF&G Div. of Subsistence, Tech. Paper No. 71. Angoon, AK. 44 pages.

George, G.D. and R.G. Bosworth. 1988. Use of fish and wildlife by residents of Angoon, Admiralty Island, Alaska. ADF&G Div. of Subsistence Tech. Paper No. 159. Juneau, AK. 193 pages.

Goldschmidt, W.R. and T.H. Haas. *Haa Aaní* our land: Tlingit and Haida land rights and use. University of Washington Press, Seattle, and Sealaska Heritage Foundation, Juneau, AK. 219 pages.

Grant, R.A., and L.A. Sill. 2017. Angoon. Pages 200-280 *in* L.A. Sill and D. Koster, editors. The Harvest and Use of Wild Resources in Haines, Hoonah, Angoon, Whale Pass, and Hydaburg, Alaska, 2012. ADF&G Division of Subsistence, Technical Paper No. 399, Douglas, AK.

Hansen, W.D., T.J. Brinkman, F.S. Chapin III, and C. Brown. 2013. Meeting Indigenous Subsistence Needs: The Case for Prey Switching in Rural Alaska. Human Dimensions of Wildlife 18(2): 109-123.

Hoonah Indian Association Environmental Programs (HIA Environmental) 2023. North Unit 4 deer working group meets for first time. https://www.hia-env.org/2023/03/27/north-chichagof-deer-working-group-meets-for-first-time/. Retrieved: May 16, 2023.

Juneau Empire. 2022. Winter ferry schedule available for review, August 16, 2022. https://www.juneauempire.com/news/winter-ferry-schedule-available-for-review/, retrieved, August 29, 2022.

Kirchhoff. M. D., and K. W. Pitcher. 1988. Deer pellet-group surveys in Southeast Alaska 1981–1987. Alaska Department of Fish and Game, Division of Game, Research Final Report. Federal Aid in Wildlife Restoration, Job 2.9. Douglas, AK.

Langdon, S.J. 2021. The significance of sharing resources in sustaining indigenous Alaskan communities and cultures. Sealaska Heritage Institute Box of Knowledge Series. Juneau, AK. 81 pages.

Langdon, S.J. and R. Worl. 1981. Distribution and exchange of subsistence resources in Alaska. ADF&G Div. of Subsistence, Tech. Paper No. 55. Juneau, AK. 126 pages.

McCoy, K. 2019. 2019 traditional deer pellet survey preliminary results. Memorandum dated June 13, 2019. ADF&G. Juneau, AK. 2 pages.

McCoy, K. 2017. Sitka black-tailed deer pellet-group surveys in Southeast Alaska, 2016 report. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2017-2, Juneau, AK.

McCoy, K. R., G. W. Pendleton, and R. W. Flynn. 2014. Assessing population estimation protocols for Sitka black-tailed deer using DNA from fecal pellets. Alaska Department of Fish and Game, Final Wildlife Research Report. ADF&G/DWC/WRR-2014-1, Juneau, AK.

Mooney, P.W. 2015. Unit 4 deer management report. Pages 6-1 – 6-14 *in* P. Harper and L.A. McCarthy, eds. Deer management report of survey and inventory activities 1 July 2012 – 30 June 2014. Alaska Department of Fish and Game. Juneau, AK.

Mooney, P.W. 2011. Unit 4 deer management report. Pages 58-74 *in* P. Harper, editor. Deer management report of survey and inventory activities 1 July 2008 – 30 June 2010. Alaska Department of Fish and Game. Juneau, AK.

Mooney, P.W. 2009. Unit 4 deer management report. Pages 57-76 *in* P. Harper, editor. Deer management report of survey and inventory activities 1 July 2006-30 June 2008. Alaska Department of Fish and Game. Juneau, AK.

Mooney, P.W. 2007. Unit 4 deer. Pages 53-69 *in* P. Harper, editor. Deer management report of survey and inventory activities 1 July 2004 – 30 June 2006. Alaska Department of Fish and Game. Juneau, AK.

Olson, S.T. 1979. The life and times of the black-tailed deer in southeast Alaska. Pages 160–168 in O.C. Wallmo and J.W. Schoen, editors. Sitka black-tailed deer: Proceedings of a conference in Juneau, Alaska. USFS, Alaska Region, in cooperation with the ADF&G. Series No. R10-48, May 1979.

OSM. 2022a. Staff Analysis WP22-07. Pages 727-778 *in* Federal Subsistence Board Meeting Materials. January 31-February 3, 2023. Office of Subsistence Management, USFWS. Anchorage, AK. 894 pp.

OSM. 2022b. Staff Analysis WP22-08. Pages 779-821 *in* Federal Subsistence Board Meeting Materials. January 31-February 3, 2023. Office of Subsistence Management, USFWS. Anchorage, AK. 894 pp.

OSM. 2022c. Staff Analysis WP22-09. Pages 792-911 in Federal Subsistence Board Meeting Materials. April 12-15, 2022. Office of Subsistence Management, USFWS. Anchorage, AK. 1267 pp.

OSM. 2022d. Staff Analysis WP22-10. Pages 822-862 *in* Federal Subsistence Board Meeting Materials. January 31-February 3, 2023. Office of Subsistence Management, USFWS. Anchorage, AK. 894 pp.

SERAC. 2023a. Transcripts of the Southeast Alaska Subsistence Regional Advisory Council proceedings. October 24–26, 2023, in Klawock. Office of Subsistence Management, USFWS. Anchorage, AK.

SERAC. 2023b. Transcripts of the Southeast Alaska Subsistence Regional Advisory Council proceedings. February 28 – March 2, 2023, in Juneau. Office of Subsistence Management, USFWS. Anchorage, AK.

SERAC. 2021a. Transcripts of the Southeast Alaska Subsistence Regional Advisory Council proceedings. March 16–18, 2021. By teleconference. Office of Subsistence Management, USFWS. Anchorage, AK.

SERAC. 2021b. Transcripts of the Southeast Alaska Subsistence Regional Advisory Council proceedings. October 5–7, 2021. By teleconference. Office of Subsistence Management, USFWS. Anchorage, AK.

SERAC. 2010. Transcripts of the Southeast Alaska Subsistence Regional Advisory Council proceedings. March 16–18, 2010, in Saxman. Office of Subsistence Management, USFWS. Anchorage, AK.

State of Alaska. 2023. Alaska Ferry Schedules. https://dot.alaska.gov/amhs/schedules.shtml. Retrieved: June 7, 2023.

Thornton, T.F. 2008. Being and place among the Tlingit. University of Washington Press, Seattle, in association with Sealaska Heritage Institute, Juneau, AK. 247 pages.

US BLS. 2023. CPI Inflation Calculator. https://www.bls.gov/data/inflation_calculator.htm. Retrieved: May 15, 2023.

US Census 2020a. Profile: Angoon City; Alaska. https://data.census.gov/profile?g=160XX00US0203440. Retrieved: May 15, 2023.

US Census 2020b. Angoon Decennial Census 2020. https://data.census.gov/table?q=Angoon+2020. Retrieved: May 15, 2023.

US Census 2010. Angoon Decennial Census 2010. https://data.census.gov/table?q=Angoon+2010. Retrieved: May 15, 2023.

US Census 2000. Angoon Decennial Census 2000. https://data.census.gov/table?q=Angoon+2000. Retrieved: May 15, 2023.

Wolfe, W.J. and L.J. Ellanna. 1983. Resource use and socioeconomic systems: case studies of fishing and hunting in Alaskan communities. ADF&G Div. of Subsistence Tech. Paper No. 61. Juneau, AK. 316 pages.

Wolfe, R.J., and R.J. Walker. 1987. Subsistence economies in Alaska: Productivity, geography, and development impacts. Arctic Anthropology 24(2): 56-81.

SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Southeast Alaska Subsistence Regional Advisory Council Recommendation

Support WP24-04 **with modification** to remove Wildlife Analysis Area 4041 from the proposed closure area and reduce the proposed closure period from November 1-15 to November 1-10 (see **Figure 4**). The Council felt this action was necessary to support the continuation of subsistence uses in this area, while also causing the least possible impact to non-federally qualified users. The Council felt that supporting the proposal with modification would provide a more meaningful subsistence preference by reducing competition during a key time for subsistence deer hunting, and thereby improve Angoon residents' ability to access deer and meet their subsistence needs efficiently and economically in a context where economic declines have forced residents to focus their hunting strategies much closer to home.

OSM's interpretation of the Council's intent is:

> **Unit 4 - Deer**
>
> *Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31.* *Aug. 1 – Jan. 31*
>
> ***Federal public lands of Admiralty Island draining into Chatham Strait south of the Thayer Creek drainage and north of Woody Point but excluding the Hasselborg Lake and Hasselborg Creek drainages are closed to deer hunting Nov. 1-10, except by federally qualified subsistence users hunting under these regulations.***

INTERAGENCY STAFF COMMITTEE COMMENTS

The ISC acknowledges the extensive effort made by the Southeast Alaska Subsistence Regional Advisory Council (Council) during both the 2022-2024 and the 2024-2026 Wildlife Regulatory Cycles to help federally qualified subsistence users meet their subsistence needs for deer in the Angoon area.

Deer populations in Unit 4 are the highest in the state and closures are not needed for conservation reasons. The Council's justification for submitting WP24-04 focuses on the closure being necessary to continue subsistence uses due to competition and user conflict in the areas closer to Angoon. While reported harvest success by federally qualified subsistence users appears stable over the last decade based on quantitative harvest data, federally qualified subsistence users in the area report these data underestimate local hunter effort and do not capture competition that affects their ability to harvest enough deer to meet their subsistence needs.

The ISC recognizes the effort that the Council has put into providing a meaningful subsistence priority, while trying to reduce restrictions on non-federally qualified users as much as possible. Since submission of their first proposal for the 2022 regulatory cycle, the Council reduced the duration of their requested closure from 2.5 months to 15 days to the current Council recommendation of 10 days at the

beginning of November and reduced the requested closure area to those areas closest to home and most utilized by Angoon residents.

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

Alaska Department of Fish and Game Comments

Wildlife Proposal WP24-04

This proposal would close federal public lands of Admiralty Island draining into Chatham Strait south of the Thayer Creek drainage (but excluding the Hasselborg Lake and Hasselborg Creek drainages) to deer hunting by non-federally qualified users (NFQU) from November 1 – November 15 (Figure 1).

Figure 1. Map of the Admiralty Island proposal area and boundaries of the ADF&G Wildlife Analysis Areas for deer hunter data used to analyze effects of the proposal.

Position

The Alaska Department of Fish and Game (ADF&G) **OPPOSES** this proposal because there are no justifications under the Alaska National Interest Lands Conservation Act (ANILCA) for the Federal Subsistence Board (FSB) to approve this closure. If enacted, it would unnecessarily deprive NFQUs of sustainable deer hunting opportunity contrary to terms in Title VIII of ANILCA. In *Alaska v. Federal Subsistence Bd.*, 544 F.3d 1089, 1100 (9th Cir. 2008), the Ninth Circuit ruled that, under ANILCA, the Federal Subsistence Board (FSB) may regulate subsistence use but is prohibited from limiting nonsubsistence use. A reduction in NFQU opportunity for hunting deer in GMU 4 is inconsistent with ANILCA under applicable case law on federal preemption. Section 815 of ANILCA authorizes federal restrictions on nonsubsistence

uses on the public lands only if "necessary for the conservation of healthy populations of fish and wildlife" or if necessary to "continue subsistence uses." Based on the following analysis of the only annually collected, objective, and quantifiable data available, none of those reasons apply. There is no conservation concern for the Chichagof/Yakobi Island deer population, and none of the harvest data collected remotely suggests FQUs are having any issues harvesting deer. In fact, several indices indicate deer remain abundant in the area affected by the proposal and local hunters are highly efficient at harvesting deer. Given this evidence there is no need to restrict harvest to conserve the population.

The stated purpose of the proposal is to "establish a meaningful preference for the continuation of subsistence use of deer", however, the proponents provide no "substantial evidence", as required by Section 805(c)(1) of ANILCA, in support of claims that the very few NFQUs hunting in this area inhibit harvest by federally qualified users (FQU), and data provided by FQUs residing in Angoon clearly indicate that the decline in harvest by that community results from declining participation and effort by Angoon hunters. As laid out in detail below, fewer Angoon residents are participating in deer hunting and those who continue to hunt do so for fewer days each year. Despite that, Angoon hunters continue to enjoy some of the most efficient hunting in Alaska. In addition, according to reports submitted by Angoon hunters, the proposed closure area is of limited importance to them and in recent years has accounted for less than one quarter of their total reported deer harvest. Angoon residents report that they harvest most of their deer in areas distant from the proposed closure area where they enjoy a high rate of success. Further, we could find no reference in Title VIII of ANILCA to the term "meaningful preference." Nor could we find justification for limiting NFQU hunting based on safety concerns, economics of FQUs, or the potential of altering deer behavior due to poor NFQU marksmanship. We conclude there is no lawful justification for adopting this proposal and it should be rejected under Section 805(c)(1).

We can find no justification for limiting NFQU hunting based on safety concerns, economics of FQUs, or the potential of altering deer behavior due to poor NFQU marksmanship. Public safety is addressed in §816 (b), but only in that it refers to the temporary closure of public lands to *subsistence uses* for reasons of public safety. We believe closing publics lands to NFQUs while leaving them open for FQUs for safety purposes related to normal seasonal changes in weather and daylight would be a misuse of §816 (b). Further, Angoon hunters reported taking 65% of their deer outside the proposed closure area, which suggests most hunters are not limited by the listed safety or economic concerns. We could also find nothing in Title VIII of ANILCA that would tie limiting NFQU opportunity to the economic fortunes FQUs.

ADF&G would note that this proposal is almost identical to the one (WP22-07) that was considered by the Federal Subsistence Board at their meeting Jan. 31-Feb. 3, 2023, where they voted 7-1 to oppose adopting these restrictions to NFQUs as it did not meet the requirements under ANILCA to do so.

> *"... As the Staff analysis also has pointed out, Section .815(3) of ANILCA states that the Board may only restrict non-subsistence uses on Federal public lands if it's necessary for the conservation of healthy populations of fish and wildlife, to continue subsistence uses of such populations or for health and human safety reasons.*

The existing deer population and harvest survey data clearly shows the deer population in Unit 4 has remained stable, it's considered the highest in the state and currently there are no conservation concerns. Subsistence users have been able to continue to harvest deer at approximately the same level for the past 10 or 20 years and the amount of time it takes for a Federally-qualified users to harvest deer has not changed.
In summary, the proposed regulation change does not meet the criteria for a closure or restriction to non-subsistence use."

To date, neither the population nor harvest levels have diminished from when the FSB took this up at the beginning of 2023. The rationale still applies and none of the requirements laid out in ANILCA have been met for this restriction to be put in place. The proponents would have you believe that is not the case and that "competition" is impeding FQU harvest success. However, we know from public testimony that this means that the very presence of NFQUs is an unacceptable level of competition. During public meetings statements were made by proponents that, "I'll call it competition, or just the presence from other hunters" and "…going to a favorite spot and, you know, seeing another boat there. It doesn't matter whether they're successful hunters or not, it's just the fact that they're there…" Nowhere in ANILCA does it empower the FSB to enact restrictions on NFQUs based solely on their mere presence in an area.

Despite what the OSM analysis says, ADF&G has observed no real support for this proposal from the community of Angoon. Thirty-seven comments were received by OSM regarding this proposal with only one in support. This mirrors the support received for WP22-07 which after an extended public process was rejected by the FSB just one year ago. At the October 2023 Southeast Subsistence Regional Advisory Council (SERAC) meeting, one SERAC member reasoned that the lack of support was because Angoon community members were too busy teaching school, hunting and otherwise engaged in making a living to participate in this public process. However, that between the extended public process the FSB gave to WP22-07 combined with the process for WP24-04 that with even with these commitments the public, including residents of Angoon, had ample opportunity to weigh in if they so wanted.

Background

This proposal has the same general goal and justification as WP22-07, which the Federal Subsistence Board rejected overwhelmingly at their January 2023 meeting. The current proposal states that FQUs from Angoon face many challenges in meeting their subsistence needs for deer including high fuel costs, depressed economies, small boats, and inclement weather. The proposal claims that NFQUs exacerbate those challenges by obstructing access, competing for deer, and potentially altering deer behavior with poor marksmanship and that competition inhibits subsistence use of deer. To mitigate these concerns and to establish a "meaningful preference" for the continuation of subsistence uses of deer, the proposal asks the FSB to close federal lands on the west side of Admiralty Island (Figure 1) to NFQU deer hunters from November 1 – November 15.

Game Management Unit (GMU) 4 encompasses the ABC Islands (Admiralty, Baranof, and Chichagof) and the surrounding archipelago, and over 90% of land in GMU 4 is federally managed. All residents of Southeast Alaska (GMUs 1-5) excluding residents of Juneau and

Ketchikan are eligible to harvest deer in GMU 4 under federal subsistence regulations. The current federal deer season for this area is August 1 – January 31 with a bag limit of six deer (bucks only August 1 – September 14). The current state season is August 1 to December 31 with a bag limit of six deer for Alaska residents (bucks only August 1 – September 14) and two bucks for non-residents. In 2019, the Alaska Board of Game (BOG) increased the state deer bag limit in GMU 4 from four to six deer because there is such an abundant population of deer within this GMU. In 2023, the BOG decreased the bag limit for non-resident deer hunters in GMU 4 from six deer to two bucks. This was done not because of conservation concerns, but to reflect actual use patterns and mitigate the perception that nonresident hunters compete with resident hunters more accurately.

These comments analyze indices of deer abundance, deer hunter participation and effort, and deer harvest in GMU 4. Deer abundance trends are derived from annual deer pellet group transects, aerial alpine surveys, and spring mortality surveys. Hunter effort and harvest data are derived from the annual deer hunter survey (1997 – 2010) and mandatory deer harvest ticket reports (2011 – present). Collectively, these data gathered by ADF&G are the only annually collected, objective, and quantitative information on deer abundance, hunter participation and effort, and harvest available for Southeast Alaska.

Analysis

GMU 4-Wide Deer Population Status

Because monitoring deer abundance in forested habitat is challenging, deer cannot be directly counted like other species in more open habitat. ADF&G uses several types of survey data to monitor trends in the population. Since the 1980's ADF&G has used spring pellet group counts to monitor broad (≥30%) changes in deer abundance. ADF&G discontinued pellet surveys in Southeast Alaska after 2019, but historical survey results show that GMU 4 consistently had the highest pellet group counts in Southeast Alaska (Figure 2). Pellet group counts < 1.0 groups/plot generally correspond to low density populations, 1.0 – 1.99 groups/plot to moderately dense populations and > 2.0 groups/plot correspond to high density populations. Pellet group counts in GMU 4 are usually well above the high-density threshold and are often double the counts in other GMUs. The most recent survey near the proposal area was in 2019 in Pybus Bay where biologists recorded 2.82 groups/plot. This broad index of deer abundance indicates that GMU 4 supports the highest deer populations in Southeast Alaska.

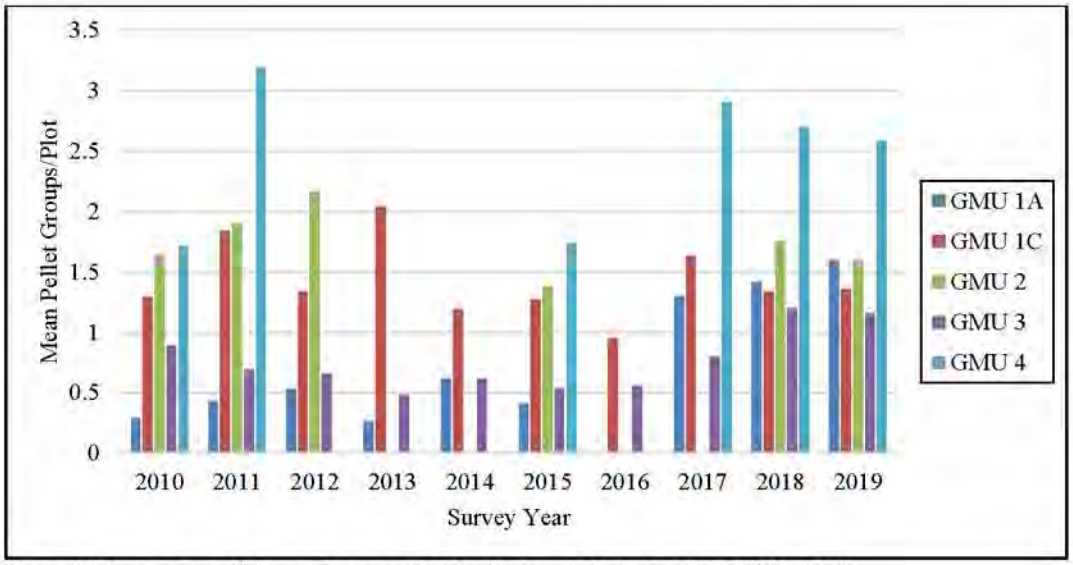

Figure 2. Mean number of deer pellet groups/plot for Southeast Alaska by GMU, 2010 – 2019.

In 2013, ADF&G began evaluating mid-summer aerial counts of deer in alpine habitats as another index of deer abundance. Surveys were conducted for two locations in GMU 4, Southern Admiralty Island (2015 – 2017) and Northeast Chichagof Island (2017-2018). The findings of those surveys were summarized as deer counted per hour of survey time (Figure 3). The southern Admiralty Island survey route near Angoon had by far the highest counts of any area surveyed.

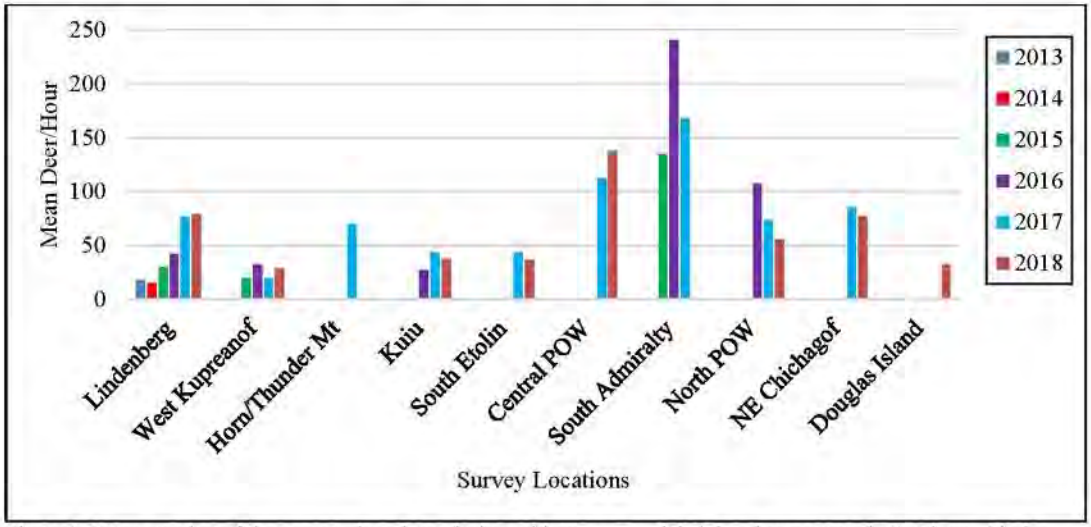

Figure 3. Mean number of deer counted per hour during mid-summer aerial alpine deer surveys in Southeast Alaska, 2013 – 2018.

ADF&G biologists in GMU 4 began conducting late winter beach mortality transects in the early 1990s. These surveys are an indicator of mortality resulting from severe winter conditions, which

is the most limiting factor for Sitka black-tailed deer populations in GMU 4. In addition to the total count of carcasses per mile, the proportion of buck, doe and fawn mortalities also indicates winter severity. Usually fawns die first, followed by adult males and then adult females. The winter of 2006/2007 was the most severe on record, and in some parts of GMU 4 managers estimated up to 75% of deer died. Note the high number of carcasses found during spring 2007 surveys (Figure 4). In the years since then, few carcasses were found indicating high over-winter survival and no significant population declines related to winter severity. Due to early and deep snow accumulations during December 2021, in spring 2022 ADF&G made a concerted effort to conduct mortality surveys throughout GMU 4. Eight surveys were conducted on Admiralty Island, including Mitchell Bay, near Angoon. Biologists counted 0.34 mortalities/mile on Admiralty, lower than the overall GMU 4 count. Survey results for 2023 were among the lowest on record with only 0.08 mortalities/mile. Field biologists observed high numbers of deer including a high percentage of short yearlings during spring 2023 body condition surveys, which corroborated mortality survey results.

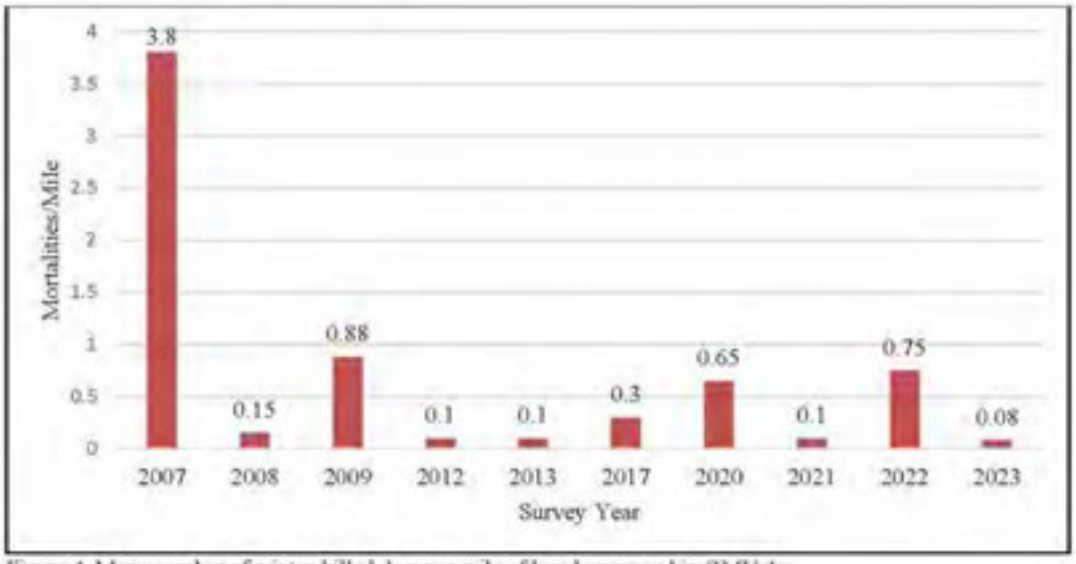

Figure 4. Mean number of winter-killed deer per mile of beach surveyed in GMU 4.

Taken together, these indices of deer abundance (pellet surveys, alpine counts, mortality transects) indicate that the GMU 4 deer population is high and stable. None of these indices suggests a decline in abundance or a conservation concern for the GMU 4 deer population. Based on observations of browsing levels, ADF&G biologists think deer populations in some areas of GMU 4 may be at or near carrying capacity and plan to recommend hunters include does in their Unit 4 bag limit for RY23.

Trends in Hunter Effort and Harvest

ADF&G biologists also use harvest as another indicator of trend in the deer population. Harvest data allow ADF&G to monitor harvest by specific communities and by geographic units known as Wildlife Analysis Areas (WAAs). ADF&G estimates hunter effort and harvest using information provided by hunters. To hunt deer in Southeast Alaska all hunters must obtain

harvest tickets. Prior to 2011, ADF&G mailed survey forms to one third of the hunters in each community who obtained harvest tickets. Since 2011, harvest tickets have come with a mandatory reporting requirement. People who obtain harvest tickets are required to report whether they (or a proxy or federal designated hunter) hunted or not. Those who did hunt are required to report where they hunted, days of hunting effort, and information about the deer they harvested.

From 1997 – 2022 the estimated average annual harvest has been 5,605 deer taken by 3,253 hunters (Figure 5). GMU 4 supports the highest deer harvest in the state with a generally stable harvest of 5,000 – 7,000 deer annually. The biggest exception being the severe winter of 2006/2007 when high harvest was followed by a significant over-winter mortality of deer throughout GMU 4. This resulted in a precipitous decline in harvest from 7,734 deer in RY06 to 1,933 deer in RY07. Based on harvest and other indicators of deer abundance, managers believe the GMU 4 deer population had fully recovered by the 2013 season.

More recently, hunter participation and harvest data reported to ADF&G for RY22 (fall 2022) indicated substantial declines in both the number of hunters and deer harvested in GMU 4. When fewer people hunt, fewer deer are harvested, but the decline in the number of people who obtained harvest tickets and reported hunting in GMU 4 was unexpected, particularly when deer remain abundant.

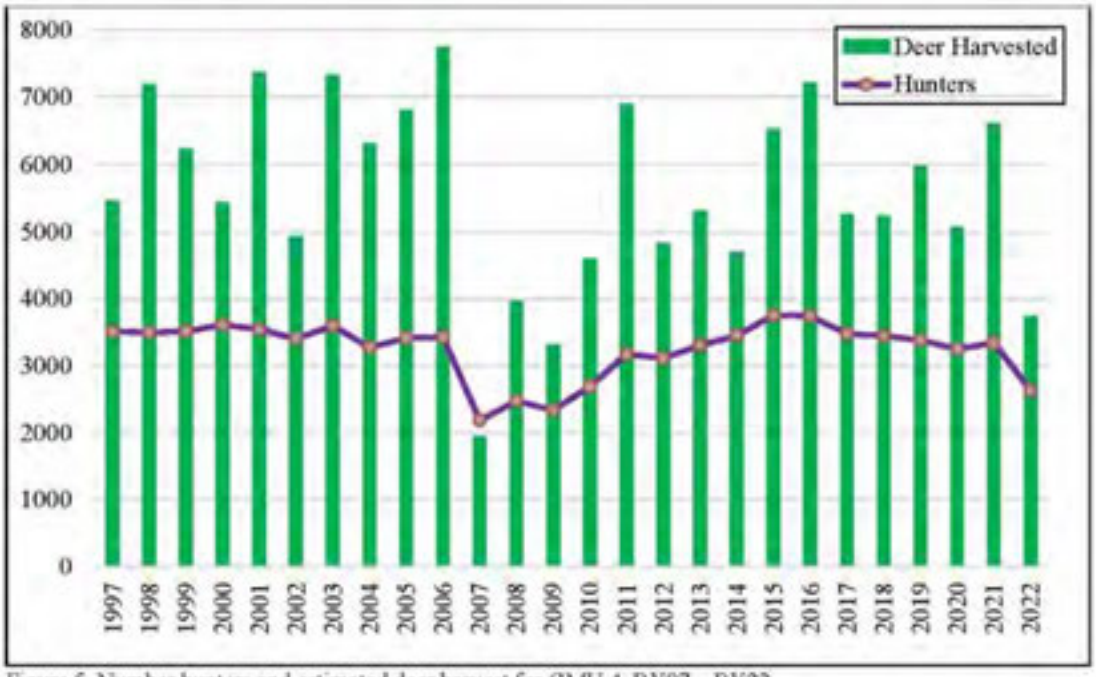

Figure 5. Number hunters and estimated deer harvest for GMU 4, RY97 – RY22.

Trends in Hunting Effort and Harvest for Angoon Residents

The proposal asserts that Angoon residents are having trouble meeting their subsistence needs for several reasons, including competition and conflict with NFQUs. Although the proposal

targets WAAs 4041, 4042, and 4055, any deer taken by Angoon residents would be considered part of their subsistence harvest, so we summarized harvest by Angoon residents for only the proposed WAAs and for harvest elsewhere in GMU 4.

Long-term records indicate a declining trend in harvest by Angoon residents (Figure 6). From RY97 to RY06 Angoon residents harvested an average of 180 deer annually in GMU 4. Harvest declined following the severe winter of 2006/2007. Since 2013, when ADF&G considered the deer population fully recovered, harvest has averaged only 113 deer annually. This represents a 37% decrease.

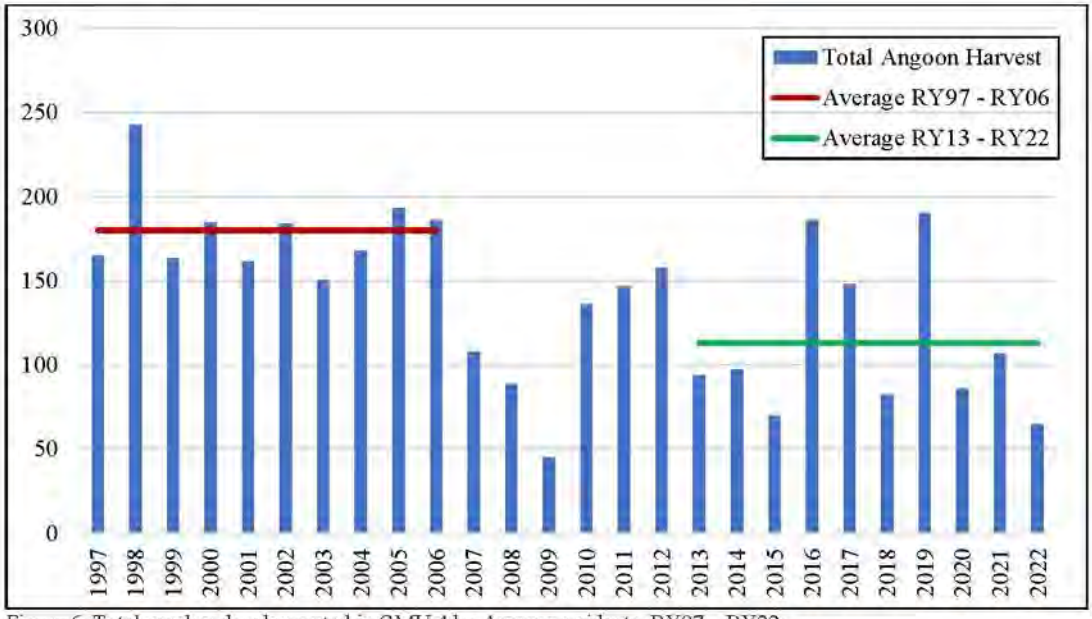

Figure 6. Total number deer harvested in GMU 4 by Angoon residents, RY97 – RY22.

To evaluate potential reasons for decline in deer harvest, we examined trends in the number of Angoon hunters and days of hunting effort by those hunters. Since 1997, the number of Angoon hunters has declined (Figure 7). From RY97 to RY06 an average of 61 hunters participated each season. The severe winter of 2006/2007 resulted in a decline in the deer population and hunting activity for several years. By 2013 ADF&G considered the deer population fully recovered, but since RY13 an average of 47 Angoon residents have hunted annually, a 23% decline from prior to 2007.

The number of Angoon residents who obtained harvest tickets corroborates the decline in number of Angoon hunters. To hunt deer or have someone hunt deer for you under the state proxy or the federal designated hunter programs, individuals are required to obtain harvest tickets. In Angoon there has been a declining trend in the number of residents who have obtained deer harvest tickets indicating fewer residents intend to hunt deer (Figure 8). Between RY97 and RY06, an average of 93 individuals obtained deer harvest tickets with a high of 109 in RY97. Since RY13, that number has dropped to an average of 74 individuals with as few as 56 in RY22.

The declining number of Angoon hunters is not surprising given that US Census records indicate the population of Angoon has declined by 38% since the year 2000.

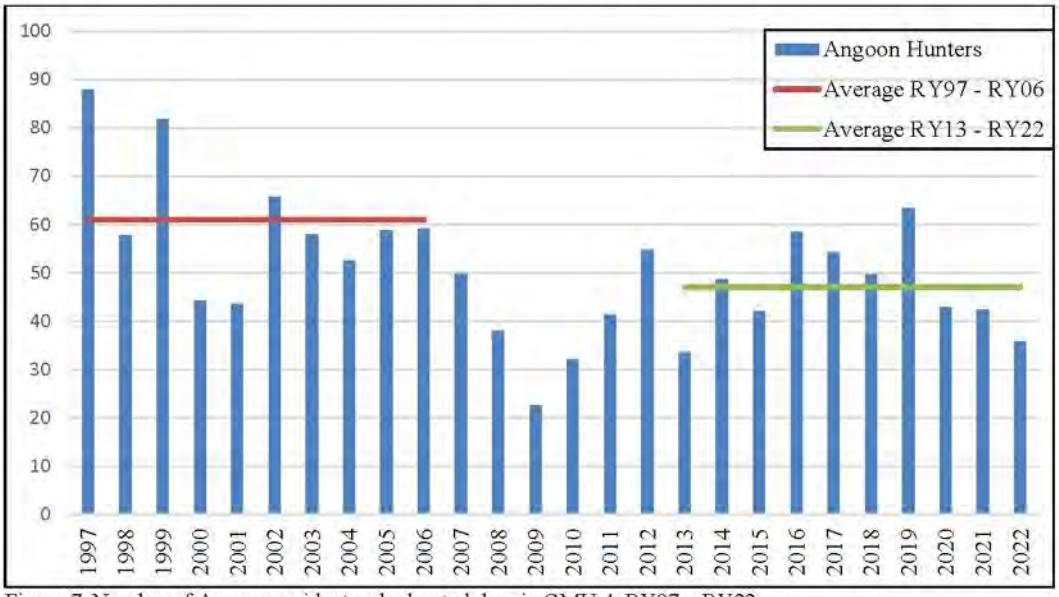

Figure 7. Number of Angoon residents who hunted deer in GMU 4, RY97 – RY22.

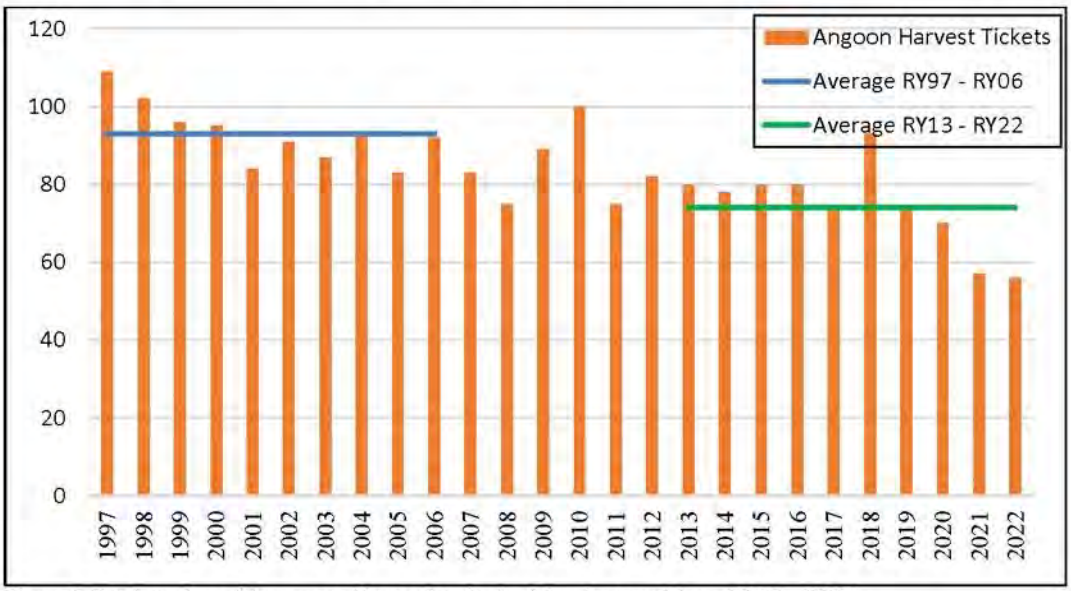

Figure 8. Total number of Angoon residents who obtained deer harvest tickets, RY97 – RY22.

The decline in hunters does not fully explain the decrease in reported deer harvest, so we also examined trends in hunting effort by Angoon residents. Prior to the 2006/2007 winter (RY97 – RY06), Angoon residents hunted an average of 373 days annually or 6.1 days per hunter. Since

RY13, Angoon hunters are spending a total of only 213 days afield annually or 4.5 days per hunter (Figure 9). This is a 43% decline in the total number of days of hunting effort by Angoon residents and a 26% decline in days per hunter. Continued high abundance of deer along with hunter participation and effort data reported to ADF&G by Angoon residents indicate that the decline in Angoon's deer harvest is a function of fewer hunters expending less effort.

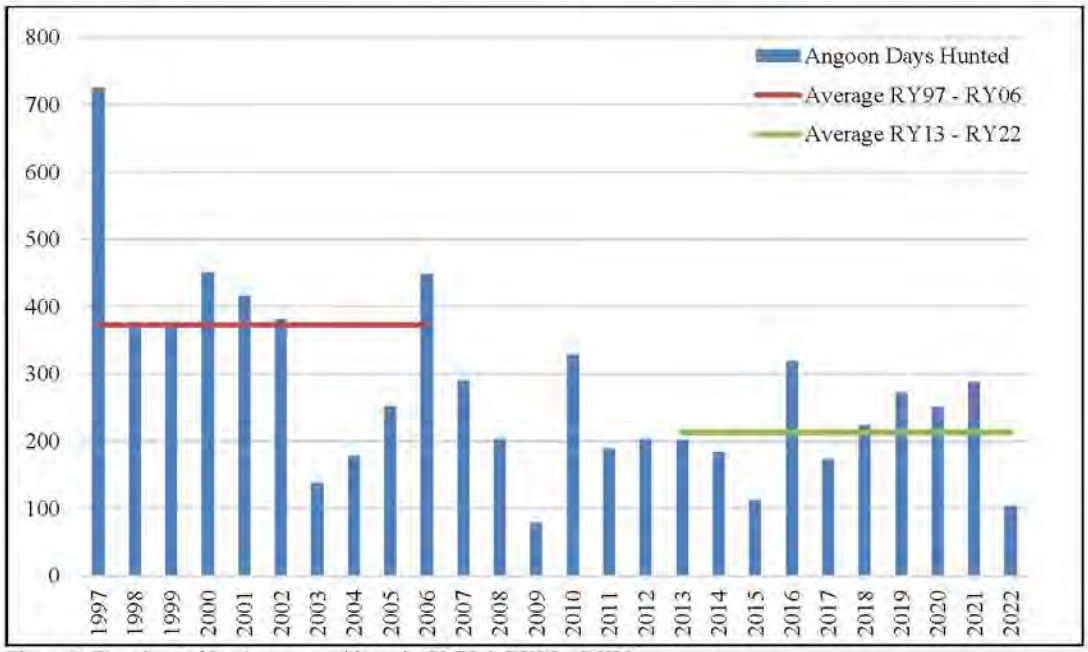

Figure 9. Days hunted by Angoon residents in GMU 4, RY97 – RY22.

Trends in Angoon Hunter Efficiency

Hunter efficiency, or the days of hunting effort required to harvest one deer, is another indicator of the ability of hunters to meet their subsistence needs. Long-term trends indicate that Angoon residents have historically been very effective at harvesting deer. That has not changed. Between RY97 and RY06, Angoon residents required 2.1 days of hunting effort for every deer harvested. Since RY13, Angoon residents have reported needing only 1.9 days of effort for every deer.

Compared to deer hunter effort required to harvest a deer in other GMUs, Angoon residents are extremely efficient. In comparison, hunters on Prince of Wales Island (GMU 2) average 4.1 days of hunting effort per deer harvested. Cordova (GMU 6D) averages 2.9 days/deer. Kodiak (GMU 8) averages 3.7 days/deer, GMU 1A (Ketchikan area) averages 4.6 days/deer, GMU 3 (Petersburg/Wrangell) averages 5.9 days/deer, and in GMU 1C (Juneau area) hunters average 7.9 days/deer (ADF&G 2013 – 2022). The average effort across GMU 4 required to harvest one deer is 2.4 days. The effort required by Angoon residents to harvest one deer in GMU 4 is lower than anywhere else in Alaska (Figure 10).

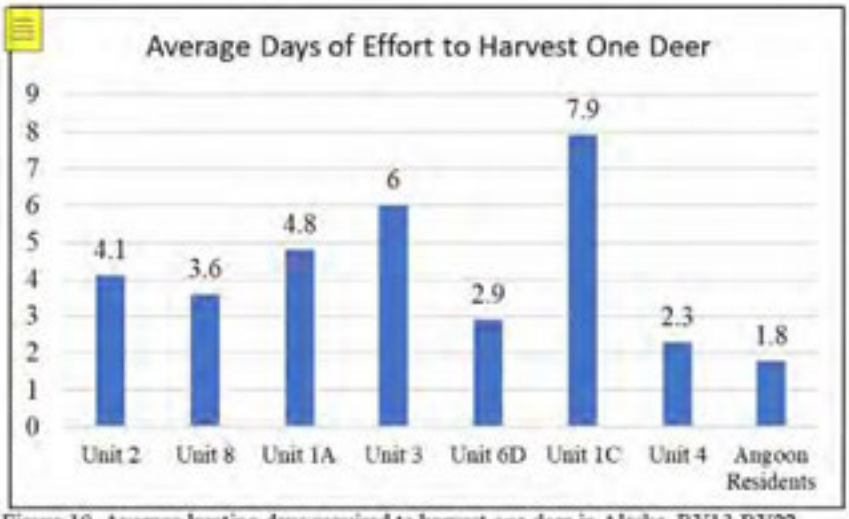

Figure 10. Average hunting days required to harvest one deer in Alaska, RY13-RY22.

While deer harvest by Angoon residents has declined, population indices indicate that the deer population is at high levels and hunter efficiency is high and as good or better than it has been historically. This indicates that declining harvest by Angoon deer hunters is a result of declining hunter participation and effort.

Angoon Harvest in the Proposal Area (WAAs 4041, 4042 & 4055)

We examined harvest and hunter effort for the proposal area to quantify potential effects of competition and the importance of the proposal area for meeting the subsistence needs of Angoon residents. Because we believe it is unlikely that Angoon residents differentiate between NFQUs and FQUs from other communities (i.e., residents of Sitka, Hoonah, Petersburg, Kake, etc.), we also summarized data for non-Angoon FQUs who hunt in the proposal area. Those hunters would not be affected by the current proposal.

The number of Angoon-based hunters using the proposal area has declined over time. Between RY97 and RY06 an average of 31 Angoon hunters used the proposal area annually. This represents about 51% of Angoon hunters during that period. Since RY13, only 21 Angoon hunters annually report hunting in the proposal area. This is a 32% decline. Between RY97 and RY06 the proposal area accounted for 38% of Angoon's total GMU 4 deer harvest. Since RY13, only 23% of Angoon's annual GMU 4 deer harvest has come from the proposal area, a 40% decline. Since RY97, approximately 65% of Angoon's total GMU 4 deer harvest has come from WAAs outside of the proposal area. One of the WAAs in the proposal area (WAA 4041, SW Admiralty Island south of Woody Point) clearly does not contribute to Angoon's subsistence hunting needs as there are only three records in 25 years (RY06, RY20, RY21) of Angoon hunters using it. WAA 4041 represents just two percent of Angoon's historical GMU 4 deer harvest. Angoon hunters regularly travel outside of the proposal area to hunt for deer. Popular areas include Sitkoh Bay on Chichagof Island, Catherine Island, Northeast Chichagof Island, Kelp and Takatz Bays on Baranof Island, and the east side of Admiralty Island near Pybus Bay and Mole Harbor. That so many Angoon hunters are using areas outside the proposal area suggests that gas prices, small boats and safety are not limiting factors for Angoon hunters.

Angoon hunters also travel outside GMU 4 to hunt deer with records for Kodiak (GMU 8) and Prince of Wales Island (GMU 2) appearing in hunt records.

The average number of NFQUs hunting in the proposal area increased slightly between the two comparison periods, with an average of 24 NFQUs hunting between RY97 and RY06 and an average of 29 NFQUs since RY13 (Figure 11). That minor increase was largely driven by more NFQU hunters in 2015 and 2016, two years with unusually nice fall weather that likely allowed more NFQU hunters to go further afield than normal. The average number of non-Angoon federally qualified hunters using the proposal area declined from 12 to 7 between the two comparison periods (Figure 12). Combining NFQUs and non-Angoon FQUs (the competition for Angoon hunters) we see that the number of non-Angoon based hunters in the proposal area has been stable for 25 years (36 vs. 36).

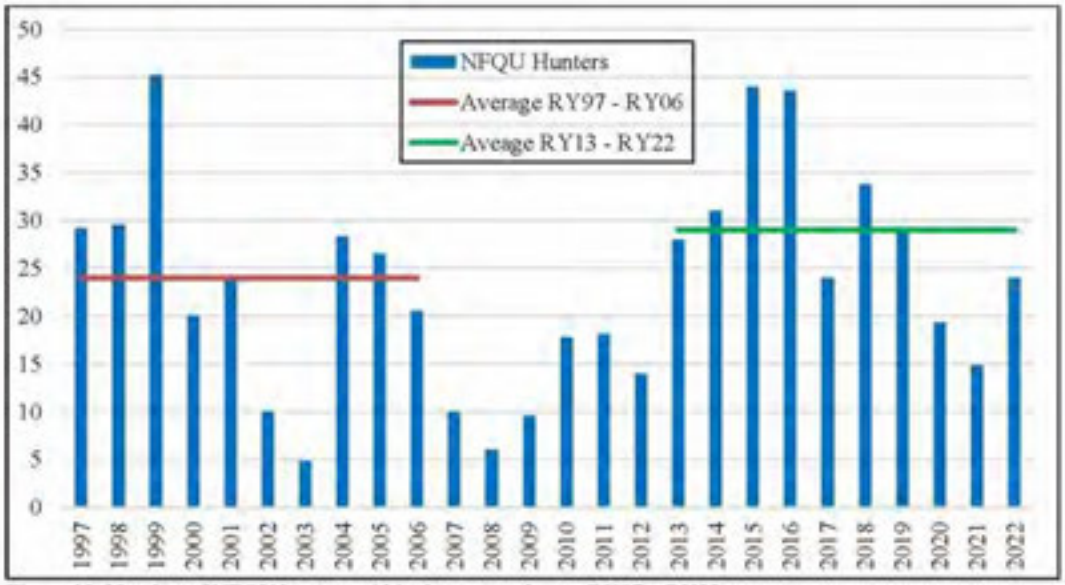

Figure 11. Number of NFQU hunters within the proposal area, RY97 – RY22.

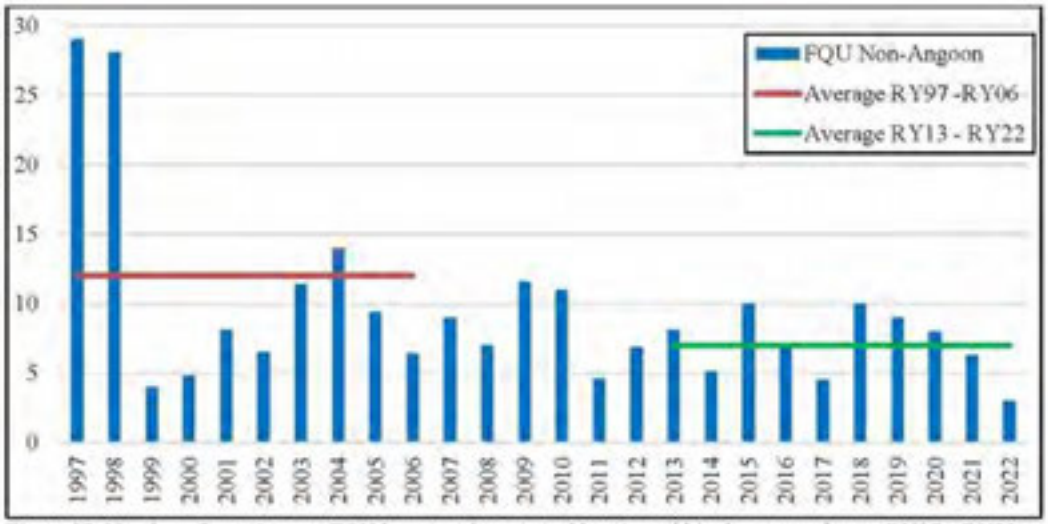

Figure 12. Number of non-Angoon FQU hunters who reported hunting within the proposal area, RY97 – RY22.

Next, we looked at hunter efficiency (the number of days of hunting required to harvest one deer) to see if we could quantify any effects of competition or reduced efficiency by Angoon-based hunters within the proposal area. From RY97 to RY06, Angoon hunters spent an average of 179 days afield and harvested 68 deer annually. This equates to 2.6 days/deer. Since RY13 Angoon hunters have spent an average of 67 days hunting to harvest 26 deer. This also equates to 2.6 days/deer. Angoon hunter efficiency within the proposal area has not changed over time, and Angoon residents in general are experiencing extremely efficient deer hunting throughout GMU 4. This contradicts the assertion in the proposal that Angoon residents are having trouble meeting their subsistence needs. If competition was resulting in reduced hunting success, we would expect to see declining hunting success rates and a corresponding increase in the number of non-Angoon hunters using the area.

One metric that could account for the perceived increase in competition from NFQUs is that the days of hunting effort by those hunters in the proposal area has increased from an average of 81 days per year from RY97-RY06 to an average of 125 days per year from RY13 – present (Figure 13). Although the number of NFQU hunters has remained relatively stable, they are spending more time afield. Hunting effort in the proposal area by non-Angoon FQUs remained stable between the two comparison periods at 36 and 33 days annually.

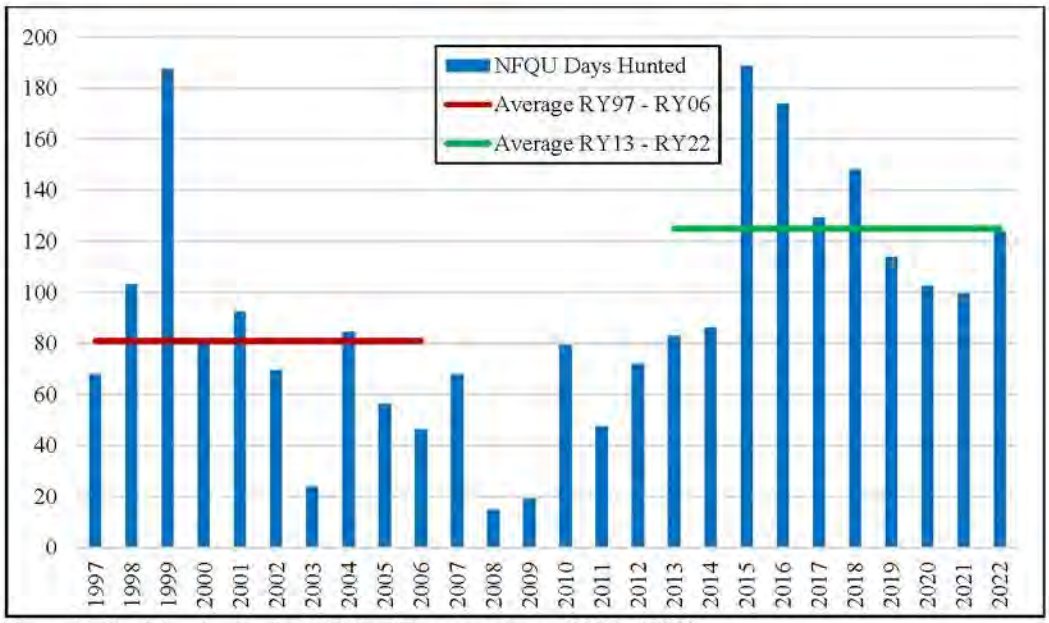

Figure 13. Total days hunting by NFQU within proposal area, RY97 – RY22.

Hunt Chronology

Mid-October through early December is the most popular time for all hunters to pursue deer in GMU 4. Deer activity coinciding with the rut as well as winter snows that push deer to beaches make for more successful hunting than earlier in the season. For all hunters in GMU 4 from RY13 to RY22, November accounts for 40% of the hunters, 50% of the hunt days, and 44% of the harvest. Hunters report hunting effort and harvest by month, so data cannot be summarized for only the proposed closure period (Table 1).

Table 1. GMU 4 deer hunting chronology of harvest and effort for all hunters as both numbers and percentage of total, RY13 – RY22.

	Hunters	%	Days Hunted	%	Deer Harvested	%
August	3,907	8	7,339	6	3,054	6
September	4,133	9	8,658	7	3,939	8
October	7,573	16	17,375	14	7,038	14
November	18,667	40	59,428	50	22,865	44
December	10,041	22	23,727	20	12,039	23
January	1,901	4	3,439	3	2,561	5
Total	**46,222**		**119,966**		**51,496**	

We analyzed hunt chronology to determine the importance of the November 1 – 15 period for Angoon hunters to meet their subsistence needs. November is an important month for hunting by Angoon residents and accounts for 33% of the hunters and 31% of the hunt days for Angoon residents. December had a higher percentage of harvest by Angoon hunters than November at 28% compared to 26%. Because our harvest statistics are only compiled by month, we are

unable to break out the Nov. 1 – 15 period, though a logical assumption would be that it accounts for roughly one-half of the November activity (Table 2).

Table 2. GMU 4 deer hunting chronology of harvest and effort for Angoon residents as both numbers and percentage of total, RY13 – RY22.

	Hunters	%	Days Hunted	%	Deer Harvested	%
August	73	10	119	6	124	11
September	72	10	152	8	125	11
October	143	19	350	17	219	20
November	244	33	639	32	289	26
December	173	23	669	33	314	28
January	35	5	89	4	34	3
Total	**740**		**2,018**		**1,105**	

Summary

We presented ADF&G's deer abundance survey data and deer hunting effort and harvest data provided to ADF&G by GMU 4 hunters including Angoon residents. To gauge changes in measures of hunter effort and harvest we compared the decade prior to the severe winter of 2006-07 with the decade since 2013 when the deer population was considered recovered. Those comparisons support the following conclusions.

1. Deer remain abundant in the proposal area. Deer pellet group transects, aerial alpine surveys, and late winter mortality surveys all indicate that in GMU 4 and on southern Admiralty Island in particular, deer occur at among the highest densities in the state. Consequently, there is no need to restrict take by NFQUs to either conserve the deer population or to ensure continued subsistence use of the deer population.
2. Although the number of NFQUs hunting deer in the proposal area has increased slightly over the last 25 years, that increase is small and offset by a decline in use of this area by hunters from other federally qualified communities. Total hunting pressure in the proposal area is light. It is also likely that some of the NFQUs hunting in the proposal area have family ties to Angoon. It is common for residents of rural communities who have moved to Juneau or Ketchikan for employment or other opportunities to visit their original rural community to hunt with and on behalf of family and friends.
3. The average number of Angoon residents participating in deer hunting each year and the days of hunting effort by those hunters have declined. Between the two comparison periods the average annual number of Angoon residents who obtain deer harvest tickets declined by 20%, reported hunting declined by 23%, and **the days of hunting effort by Angoon residents declined by 43%**. Since 2000 the US Census indicates the population of Angoon has declined by nearly 40%. Declines in the number of hunters, hunting effort, and number of deer harvested are a natural consequence of the shrinking population of Angoon, not the result of competition from NFQUs.
4. The days of hunting effort Angoon hunters require to harvest one deer remains very low at 1.9 days of hunting per deer harvested. The proposal emphasizes that subsistence hunters need to be efficient, and this is among the most efficient hunting anywhere in Alaska.

5. Reports submitted to ADF&G by Angoon hunters indicate that in the last decade the area affected by this proposal has accounted for only 23% of the deer they harvest, and there are only 3 records of Angoon hunters harvesting deer in WAA 4041. Angoon hunters report that they harvest most (65%) of their deer outside the proposed closure area including Catherine Island, northeastern Baranof Island, eastern Chichagof Island, and southeastern Admiralty Island.

Impact on Subsistence Users

The proposed Nov. 1 - 15 closure will exclude NFQUs and reduce the already very small amount of competition between Angoon residents and NFQUs in the closure area. However, NFQUs would still be able to hunt adjacent state-owned tidelands, state public uplands, and private property. The proposed closure will not reduce competition between Angoon residents and FQUs from other Southeast communities. If any NFQUs excluded from hunting during the proposed closure have ties to Angoon and normally hunt and share meat with family and friends who reside there, the proposed closure could have the unintended consequence of reducing the amount of deer meat available to Angoon residents.

Impact on Other Users

Opportunity for NFQUs to harvest deer on federal public lands within the proposed closure area would be reduced. Since RY13 an average of 30 NFQUs have harvested 42 deer annually in the proposal area. Applying the percentage of GMU 4 hunters who hunt during November, we estimate the proposed Nov. 1 – 15 closure will affect 6 NFQU hunters and reduce NFQU harvest by 10 deer annually. Some NFQU hunters are likely former residents of Angoon who moved to federally designated non-rural areas for economic, health or education reasons but return to Angoon to hunt and partake in their traditional subsistence practices.

Opportunity Provided by State

The season and bag limits for deer in GMU 4 *Remainder* including Admiralty Island are:

	Bag Limit	**Open Season**
Residents	Six deer (bucks only to September 14)	August 1 – December 31
Non-Residents	Two bucks	August 1 – December 31

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

Amounts Reasonably Necessary for Subsistence (ANS): Alaska state law requires the BOG to determine the amount of the harvestable portion of a game population that is reasonably necessary for customary and traditional uses. This is an ANS. The BOG does this by reviewing extensive harvest data from all Alaskans, collected either by ADF&G or from other sources.

ANS provides the BOG with guidelines on typical numbers of animals harvested for customary and traditional uses under normal conditions. Hunting regulations can be re-examined if harvests

for customary and traditional uses consistently fall below ANS. This may be for many reasons: hunting regulations, changes in animal abundance or distribution, or changes in human use patterns, just to name a few.

The ANS for deer in GMU 4 is 5,200 – 6,000 deer. The ANS was established in 1992.

Conservation Issues

There are no conservation issues for the deer population in GMU 4 or on southern Admiralty Island. Following a decade of mild winters, the population indices summarized in these comments all indicate the GMU 4 deer population remains high and stable. In fact, managers in GMU 4 will be encouraging hunters to include does as part of their RY23 bag limit as deer populations may be at or near carrying capacity in some watersheds. Deer harvest remains within the historical range and state ANS is met in most years. Population indices and measures of hunter effort and success indicate that GMU 4 has the highest population of deer and highest hunting success of anywhere in the state.

Based on the information provided to ADF&G by GMU 4 deer hunters, population indices, anecdotal reports by local hunters and field observations by management biologists we conclude that there is no conservation concern for the GMU 4 deer population. The proponent also conceded that there is no conservation concern for GMU 4 deer at the January 2023 Federal Subsistence Board meeting.

Enforcement Issues

Passage of this proposal will create increasingly complex regulations for NFQUs. Enforcement will be challenging because NFQUs will remain eligible to hunt deer on state-owned tidelands, lands below the line of mean high tide, and on other state and private property. The tideline is not marked, so NFQUs and enforcement officers will have difficulty determining when deer are harvested above or below that line of mean high tide. Further, brown bear season will still be open in much of the proposal area making it difficult for enforcement to tell what species hunters are targeting. Since Angoon residents may not be able to differentiate between NFQUs and non-local FQUs, reports to law enforcement of NFQUs hunting in the proposal area may be in error.

WRITTEN PUBLIC COMMENTS

Fw: [EXTERNAL] Comments on Southeast Proposals

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:14 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Thursday, July 6, 2023 8:51 AM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Comments on Southeast Proposals

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Ryan Beason <rlbeason14@gmail.com>
Sent: Saturday, July 1, 2023 1:46 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Comments on Southeast Proposals

I am opposed to the following proposals

WP24-04 (Southwest Admiralty)
WP24-05 (Hoonah Area / NCCUA)
WP24-06 (Pelican Area / Lisianski Inlet)
WP24-02
WP24-03

- Ryan Beason

Fw: [EXTERNAL] Proposals to limit deer hunting in SE Alaska

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:29 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Tuesday, June 27, 2023 1:33 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Proposals to limit deer hunting in SE Alaska

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: art dunn <adunn1848@gmail.com>
Sent: Sunday, June 25, 2023 5:25 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Proposals to limit deer hunting in SE Alaska

I am writing to address the following proposals: WP24-04, WP24-05, and WP24-06.
In short, I am adamantly opposed to these proposals.

I happen to be a Juneau resident who has hunted in all of the areas described in these proposals. In over 40 years of hunting in these areas I have never seen any conflicts between subsistence and sport hunters that could be characterized as competition. On the other hand, I have witnessed violations of the hunting regulations by subsistence hunters, such as hunting from watercraft, shooting on or across roads, and hunting after dark using spot lights.

I have just finished an overview of 36CFR242 and do not find any mention of competition as a reason to restrict hunting opportunity for non-rural hunters on Federal lands.

Sincerely,
Arthur C Dunn

Fw: [EXTERNAL] Comment on WP24-04

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:33 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Wednesday, June 21, 2023 10:51 AM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Comment on WP24-04

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Miakah Nix <mnix@ecotrust.org>
Sent: Wednesday, June 21, 2023 10:04 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Comment on WP24-04

Theo Matuskowitz,

Subsistence hunting and fishing are subjected to disproportionate levels of regulation and scrutiny. I am supportive of this proposal. I believe it is an innovative way to not only support, but to prioritize subsistence users' household needs and an investment in local food security.

Thank you for the opportunity to weigh in,
Miakah

June 30, 2023

Electronic Submission via subsistence@fws.gov

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

Re: Safari Club International Comments on Wildlife Proposal 24-04

Dear Federal Subsistence Board:

Safari Club International ("SCI") submits this comment in strong opposition to Wildlife Proposal 24-04 ("WP24-04"), which would close federal public lands on Admiralty Island in Game Management Unit 4 ("GMU 4") to Sitka black-tailed deer hunting for non-federally qualified users ("NFQUs") from November 1 to November 15. In February 2023, the Federal Subsistence Board ("FSB") rejected a similar proposal, which sought the same closure for the period from September 15 to November 30 ("WP22-07"). WP24-04 has no more support than WP22-07, and it should be denied for the same reasons.

In denying WP22-07, the FSB acknowledged that it ran counter to the directives set out in the Alaska National Interest Lands Conservation Act of 1980 ("ANILCA") because the FSB "may only restrict non-subsistence uses on Federal public lands if it is necessary for the conservation of healthy populations of fish and wildlife, to continue subsistence uses of such populations or for health and human safety reasons."[1] The FSB found that the proposal did not meet the criteria for a closure or restriction to non-subsistence uses. WP24-04 suffers from the same deficiencies.

SCI fully understands and supports ANILCA's directive that subsistence use must be prioritized, and that non-subsistence use must be limited if a conservation need exists. However, the population of Sitka black-tailed deer in this area is healthy. There is no reason for non-subsistence hunting to be restricted to protect subsistence use. Accordingly, SCI urges the FSB to reject WP24-04.

Safari Club International

Safari Club International, an IRC § 501(c)(4) nonprofit organization, has approximately 70,000 members and advocates worldwide. SCI has two chapters and approximately 1,600 members.

[1] *See* Dave Schmid, representative from the United States Forest Service, testimony on WP22-07 at the FSB Fisheries Regulatory Meeting, available at https://www.doi.gov/sites/doi.gov/files/fsb-fisheries-regulatory-meeting-2-feb-23.pdf.

Safari Club International – Washington, DC Office
501 2nd Street, NE, Washington, DC 20002 • Phone 202 543 8733 • Fax 202 543 1205 • www.safariclub.org

and advocates who live and hunt in Alaska. Many SCI members live in urban areas in southeastern Alaska, and therefore would face reduced hunting opportunities if WP24-04 were adopted. In addition, many SCI members are professional hunters and guides in Alaska, whose livelihoods will be affected by this proposed closure. Many nonresident SCI members visit Alaska to enjoy its beautiful habitat, abundant wildlife, and unique hunting opportunities.

SCI's missions include conservation of wildlife, protection of the hunter, and education of the public concerning hunting and its use as a conservation and wildlife management tool. SCI has long been an advocate of fair and equitable access to game resources in Alaska. And while SCI supports a subsistence priority as appropriate, SCI is concerned about the lack of biological or conservation support for WP24-04.

WP24-04's proposed closure is not authorized by ANILCA.

The FSB should reject WP24-04 because it requests relief outside the subsistence priority established in ANILCA. ANILCA Section 815(3) allows the FSB to close federal lands to non-subsistence hunting in very limited circumstances. The statute provides that "[n]othing in this title shall be construed as … authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on the public lands … unless necessary for the conservation of healthy populations of fish and wildlife," or "to continue subsistence uses of such populations."[2] Thus, ANILCA preserves rights of non-subsistence hunters to share in hunting opportunities on public lands, unless "necessary" to protect either the wildlife resource or the subsistence priority. ANILCA does not authorize closure due to perceived "competition" between user groups.[3] WP24-04 makes no showing that this limited closure standard has been satisfied.

Significantly, the deer population in GMU 4 is one of the largest in the state.[4] Pellet group transects, aerial alpine counts, and spring mortality surveys show a healthy deer population and do not suggest a decline in deer abundance or a conservation concern for the GMU 4 deer population.[5] A closure of Admiralty Island to NFQUs would not be "necessary" to ensure the "continued viability" of a healthy Sitka black-tailed deer population. The proponents of WP24-04 do not even try to assert that the closure is necessary for conservation purposes.[6]

---

[2] 16 U.S.C. § 3125(3).
[3] *Ninilchik Traditional Council v. United States*, 227 F.3d 1186, 1192 (9th Cir. 2000) (finding that although ANILCA emphasizes the importance of subsistence lifestyles, its other goals include the preservation of recreational opportunities for sport hunting which inherently results in competition).
[4] FSB, FSB Public Materials (Volume II, Book C 2023), at 752, available at https://www.doi.gov/sites/doi.gov/files/book-c-1-non-consensus-agenda.pdf ("FSB 2023").
[5] *Id.* at 764.
[6] FSB, Federal Subsistence Management Program 2024-2026 Wildlife Proposals (Part I), at 13, available at https://www.doi.gov/sites/doi.gov/files/pages-from-wildlife-proposal-book-2024-2026-part-i-wp24-01-wp24-18.pdf.

Safari Club International – Washington, DC Office
501 2nd Street, NE, Washington, DC 20002 • Phone 202 543 8733 • Fax 202 543 1205 • www.safariclub.org

The closure is also not necessary for the continuation of subsistence uses. Based on reported harvest data, hunting effort, and harvest success rates, the success of Federally Qualified Users ("FQUs") has generally been stable and favorable over the last ten years.[7] According to Alaska Department of Fish and Game ("ADFG") data, since 2013, deer harvested per FQU has been trending upward, suggesting that FQUs, including Angoon hunters, are enjoying increased success.[8]

Notably, hunting effort by NFQUs has declined over the last twenty years. Accordingly, the data indicate that crowding and competition from NFQUs has not increased—but has decreased. Further, reported harvest data show that both user groups (FQUs and NFQUs) hunt in different areas within the proposed closure.[9] The FSB relied on the above information to reject WP22-07. Without a significant change in data, the closure is not necessary for the continued subsistence use of FQUs. Since the proposal does not satisfy ANILCA, the FSB must decline to accept it.

WP24-04 should be rejected because it does not comply with FSB regulations authorizing closures.

It is also improper to close the area because WP24-04 does not satisfy the regulatory criteria that allows the FSB to close public lands to non-subsistence harvest. As noted above, under limited circumstances specified in Title VIII of ANILCA, the FSB is authorized to restrict, close, and reopen federal public lands to the non-subsistence hunting of wildlife.[10] The FSB has implemented these provisions in regulations, which provide that the FSB may only approve a proposed closure of non-subsistence uses of a particular wildlife population if "necessary for the conservation of healthy populations of fish or wildlife, to continue subsistence uses of fish and wildlife, or for reasons of public safety or administration."[11] None of these limited justifications exist on the facts presented.

GMU 4 hosts one of the largest deer populations in the state. The ADFG's comprehensive data do not suggest a decline in deer abundance or a conservation concern.[12] Further, the closure would not be necessary for continued subsistence use. Data show that over the last twenty years, FQUs' effort to harvest deer have remained low while their success has increased. NFQUs' days of effort have also declined, reducing the potential overlap of hunting days between the two groups.[13] The proposal cites no data in support of its assertion that subsistence harvest will benefit from closing non-subsistence use, and the mere statement that subsistence use has

[7] FSB 2023at 774.
[8] *Id.* at 773.
[9] *Id.* at 753.
[10] 16 U.S.C. §§ 3114, 3125(3), 3126(b).
[11] 36 C.F.R. § 242.10(d)(4)(vi).
[12] *E.g.*, FSB 2023 at 752.
[13] FSB 2023 at 766.

declined due to competition with NFQUs is unsupported.[14] The proponents do not cite any concerns about public safety or administration.

The proponents have not demonstrated a conservation need, a subsistence continuation concern, or a concern for public safety or administration. Therefore, the FSB should not approve WP24-04 because it does not meet the standards set forth in its implementing regulations.

Conclusion

SCI urges the FSB to follow their reasoning from February 2023, and to reject WP24-04. Thank you for the opportunity to comment on this important proposal. If you have any questions or need anything further, please contact Madie Demaske, SCI Litigation Associate, at litigation@safariclub.org.

Sincerely,

Sven K. Lindquist

Sven Lindquist
President, Safari Club International

[14] *See* SERAC Proposal, Federal Subsistence Management Program 2024-2026 Wildlife Proposals (Part I), at 13, available at https://www.doi.gov/sites/doi.gov/files/pages-from-wildlife-proposal-book-2024-2026-part-i-wp24-01-wp24-18.pdf.

Fw: [EXTERNAL] Comments on Proposal WP24-04

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:28 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Tuesday, June 27, 2023 1:39 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Comments on Proposal WP24-04

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Territorial Sportsmen <territorialsports@gmail.com>
Sent: Monday, June 26, 2023 8:07 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Comments on Proposal WP24-04

Theo Matuskowitz (subsistence@fws.gov),

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal WP24-04 seeking to close the area between Fishery Point and Point Gardner on Admiralty Island in Unit 4 to non-federally qualified users (NFQUs) from November 1 to November 15. TSI wholly supports the Alaska Department of Fish and Game's (ADFG) comments opposing this proposal.

WP24-04 holds that the mere presence of NFQUs during this time period is inhibiting "the continuation of subsistence uses of deer" for the Federally Qualified Users (FQUs). TSI disagrees with this rationale for the proposals. Data indicates that NFQU participation has declined precipitously since the early 2000s. Since 2010, 39 was the average number of NFQU hunters in the proposed area. During that period, there were several years where the number of NFQU hunters was 30 or less. These extremely low levels of NFQU participation do not support the claims made by the proposal. Additionally, the number of hunter days by NFQUs has also dropped in concert with the number of NFQU hunters. Finally, there has been little change since 1997 in the hunting effort required of FQUs to harvest a deer (effectiveness).

Given the low NFQUs numbers, lack of change of FQU effectiveness, and the boating distance involved to reach the proposal area, TSI believes the data presented by ADFG suggests that NFQU effort in the proposal area is likely primarily those with personal ties to the community of Angoon.

TSI understands that part of the Southeast Rural Advisory Committee's rationale in putting forth these proposals is to ensure "meaningful" rural priority. However, FQUs already have meaningful priority through the exclusive FQU January season as well as the Federally Designated Hunter Program. TSI urges the Federal Subsistence Board to not pass this proposal as it is not clear that closing the area between Fishery Pt and Pt Gardner during the rut to already very low numbers NFQUs will create a meaningful and significant priority for FQUs.

Thank you.

Ryan, Beason, President
Territorial Sportsmen, Inc.

The Territorial Sportsmen (a 501(c)(4) organization) is a local sportsmen / conservation organization that has been in existence before statehood – approximately 77 years. We have a membership of approximately 1,600 members.

Our organization sponsors a local fishing derby to raise funds for scholarships which total over $2 million awarded to-date. We also build and maintain public use cabins for the Alaska State Park system, support regional hunter safety and firearm safety programs, assist in maintaining high school and middle school competitive shooting programs, support family fishing day events, and participate in numerous local outdoor events.

Territorial Sportsmen, Inc. | PO Box 32712 | Juneau, Alaska 99803
Phone: 907-789-2399 | Fax: 907-586-6020
territorialsports@gmail.com | https://territorialsportsmen.org/

Fw: [EXTERNAL] WP24-04 and WP24-05

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:14 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Wednesday, July 5, 2023 8:31 AM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] WP24-04 and WP24-05

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Patrick malecha <patmalecha55@gmail.com>
Sent: Friday, June 30, 2023 11:29 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] WP24-04 and WP24-05

Federal Subsistence Boards
Attn: Theo Matuskowitz

Office of Subsistence Management

I am writing in opposition to Proposals WP24-04 and WP24-05 regarding deer hunting closures in the Hoonah and Southwest Admiralty areas. I am an Alaskan who lives in Juneau but am not currently qualified for federal subsistence. I respect the intent of the federal subsistence programs in Alaska but feel these proposals are not necessary. The deer populations in these regions are successfully managed by the Alaska Department of Fish and Game and are currently considered healthy. Further, both of these proposals make unfounded claims regarding Juneau and non-federally qualified hunters without supporting scientific evidence or data.

Please respect that the State of Alaska has management authority for wildlife resources in Alaska and that all Alaskans deserve access to these resources if there is not a valid subsistence hardship. Reject Proposals WP24-04 and WP24-05.

Respectfully,
Pat Malecha

Federal Subsistence Board
Attn: Theo Matuskowitz
Office of Subsistence Management
1011 E. Tudor Rd. M/S 121
Anchorage, AK 99503-6199

June 29, 2023

Dear Federal Subsistence Board,

Please accept this letter as the official public comment from the ADFG Juneau Douglas Advisory Committee in opposition to the federal Unit 4 deer proposals (WP24-04, WP24-05, WP24-06) to be considered at the Oct 2023 meeting. We understand that the proposal's authors wish to ensure a significant and meaningful priority is afforded to all Federally Qualified Users (FQUs). As our comments on previous iterations of these proposals have noted (see attached), we do not feel these proposals address this concern. Instead, they create significant loss of opportunity for non-federally qualified users when there do not appear to be conservation or FQU hunter-success concerns. In considering the Unit 4 deer proposals from 2022, the Federal Subsistence Board heard testimony to this effect and declined to pass those proposals. We urge the Board to follow suit and not support these proposals.

Sincerely,

Juneau Douglas Advisory Committee

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

Dear Federal Subsistence Board,

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

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

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

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

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

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

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

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

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

Sincerely,

Juneau Douglas Advisory Committee

Fw: [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:21 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Tuesday, June 27, 2023 4:07 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: John Bohan <johnbohan1969@gmail.com>
Sent: Tuesday, June 27, 2023 10:14 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06

Mr Matuskowitz,

I am a 30 year Juneau resident and avid deer hunter. I mainly hunt in Tenakee inlet and on Southwest Admiralty Island. I am writing to express opposition to proposals WP24-04, WP24-05, and WP24-06. These proposals are largely similar to proposals that have been submitted and have failed in recent years. I would urge the OSM to reject these proposals on the same grounds that the previous proposals failed. They are wholly unnecessary.

Thank you for considering my comments.

John Bohan
Juneau Alaska

Fw: [EXTERNAL] Comments wp24=04, wp 24-05, wp24-06

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:18 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Friday, June 30, 2023 3:28 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Comments wp24=04, wp 24-05, wp24-06

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Go Hawks <kennethsteven80@gmail.com>
Sent: Friday, June 30, 2023 9:46 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Comments wp24=04, wp 24-05, wp24-06

Mr. Muskowitz,

As a former Hoonah resident born and raised who is currently working and residing in Juneau I am writing in opposition to the above listed proposals. I mainly hunt and gather in Hoonah and Tenakee and feel these proposals would limit my ability to hunt and gather. Please reject these proposals on the grounds that previous proposals have been rejected by the OSM. They are unnecessary and not needed. The abundance of deer in southeast ABC islands is at an all time high deeming these proposals unnecessary. Thank you for your consideration in this matter.

Ken Brown
Juneau

Fw: [EXTERNAL] Response to WP04 4 thru 6

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:21 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Wednesday, June 28, 2023 11:07 AM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Response to WP04 4 thru 6

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Thomas Chapin <garnetstreet@icloud.com>
Sent: Tuesday, June 27, 2023 6:22 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Response to WP04 4 thru 6

Parking? Missed shots? and anchoring....really!

This is a condition brought on by road hunting. Perhaps we should consider fair chase and the sport itself....
Implement the half mile from the road rule and bring an end to this discussion....
People who hunt in these areas choose to road hunt. And it seems that Hoonah has the most complaints and the most roads...
Road access has been a deciding factor in previous game management decisions, and should be considered in this situation. Hoonah's road system (logging roads) are bordered by little more than clear cut areas.
Shooting from a vehicle is not fair case and is far from sportsmanship!!!
To expect any benefits from our resources we must first respect them, and fair case regardless of any entitlements or claims.
Thank you for this opportunity to respond....

Sent from my iPhone

Fw: [EXTERNAL] Public Comment on Proposed SEAK Deer Season Changes

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:25 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Tuesday, June 27, 2023 1:57 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Public Comment on Proposed SEAK Deer Season Changes

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: MATTHEW CRESWELL <mtcreswell@gmail.com>
Sent: Tuesday, June 27, 2023 8:38 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Cc: matthew.creswell@juneau.gov <matthew.creswell@juneau.gov>
Subject: [EXTERNAL] Public Comment on Proposed SEAK Deer Season Changes

Good Morning,

I am writing to voice my opposition to the proposed changes to allowing Juneau are hunters to access WP24-04, 05, 06.

I am an avid deer hunter and I believe it is extremely unfair to say that public lands should be set aside for a specific user group. These lands are for everyone to enjoy, not just people who live in the area. This is like saying that people from Hoonah can't come to Juneau and visit the Mendenhall Glacier. This is a bad way to manage public lands and I believe it should not be allowed to pass.

Thank you for your time.

Matt Creswell
Juneau

Fw: [EXTERNAL] Federal Subsistence Board Proposals WP24-04, WP24-05 and WP24-06

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:25 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Tuesday, June 27, 2023 1:53 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Federal Subsistence Board Proposals WP24-04, WP24-05 and WP24-06

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: John DeMuth <jdemuth@pndengineers.com>
Sent: Monday, June 26, 2023 5:37 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Federal Subsistence Board Proposals WP24-04, WP24-05 and WP24-06

Attn: Mr. Theo Matuskowitz

The following is in response to the latest round of prejudice proposals being considered to restrict only people who reside in Juneau, Alaska from being able to hunt deer in select, nearby areas. As before, these proposals are not based on data, facts or truth as was pointed out by the ADFG who put out a YouTube video that very effectively debunked any notion that Juneau hunters are having any significant impact to deer populations in these communities. Data and facts have always pointed to weather as the reason for deer population fluctuations – in Southeast Alaska and Kodiak.

Weather also is the main hinderance to hunters being able to get into the field. Couple that with high fuel prices, and it is very evident that few folks can afford the time, expense and own vessels that are able to handle heavy seas and freezing spray in Chatham and Icy Straits during late winter months. The opposite side of the coin is true as well – subsistence hunters in these communities are not going to risk weather and spend money on fuel for traveling any significant distance from their community to bag meat for the freezer – and folks from outside the community are not interested in hunting near a community where residences have a longer season and regularly are hunting for their own food. Hence, drawing up maps that have such large "exclusion zones" makes no logical sense. For example, why does the exclusion area for Hoonah include the north shore of Tenakee Inlet? So anyone who owns a remote cabin in Freshwater Bay or Tenakee is not allowed to hunt near their own cabin?

I respectfully ask that these politically motivated, emotionally charged, and divisive proposals that have no factual basis (like "Juneau hunters will miss their shots at deer, causing them to be more skittish) be once again rejected as bad policy that is not necessary and not supported by the ADFG, but instead is being pushed by native and bush community lobby groups who are not interested in effectively managing public resources for the good of all users, but rather to selectively exclude some users based on their place of residence.

Respectfully,

John DeMuth
Juneau, Alaska

Fw: [EXTERNAL] Opposition to proposals

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:28 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Tuesday, June 27, 2023 1:41 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Opposition to proposals

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Jason Hass <jasonhass1@gmail.com>
Sent: Monday, June 26, 2023 8:10 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Opposition to proposals

Good morning-

I am writing to voice my opposition to proposals WP24-04, WP24-05, WP24-06. Having been to all of the communities affected by these proposals, I firmly believe that these proposals are not needed. These proposals will also negatively affect folks in other communities, some of which depend on the resource as much as residents in the smaller communities.
Thanks for the opportunity to comment!
Jason Hass

Fw: [EXTERNAL] Federal proposals, WP24-04, WP24-05, and WP24-06

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:34 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Wednesday, June 21, 2023 10:41 AM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Federal proposals, WP24-04, WP24-05, and WP24-06

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Wayne Hall <wayne240ak@gmail.com>
Sent: Wednesday, June 21, 2023 9:24 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Federal proposals, WP24-04, WP24-05, and WP24-06

Attn: Theo Matuskowitz

I oppose the three following federal proposals, WP24-04, WP24-05, and WP24-06, because they are not necessary nor are they based on any quantitative data, only speculation and opinion of one interest group. To claim that the presence of Juneau hunters during Nov 1 - Nov 15 is causing rural residents to not be able to harvest deer, is not based on any factual data. Examples of arbitrary unsubstantiated statements in the proposal include:

WP24-06

To the make the statement "This proposal is necessary for public safety..." Is disingenuous and has no basis of fact.

"Non-Federally-qualified users flock to Hoonah..." Again, this is an arbitrary statement that has no data to back up one person's view.

Similar statements are seen throughout proposals WP24-04 and WP24-05 as well.

I oppose all aspects of the three proposals.

Regards,

Wayne Hall

Juneau resident.

Fw: [EXTERNAL] WP24-04, WP24-05 and WP24-06

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:26 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Tuesday, June 27, 2023 1:52 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] WP24-04, WP24-05 and WP24-06

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Brandon Ivanowicz <bivanowicz@pndengineers.com>
Sent: Monday, June 26, 2023 2:00 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] WP24-04, WP24-05 and WP24-06

Hi Theo, I have reviewed the proposals WP24-04, WP24-05 and WP24-06 and strongly oppose them. These proposals are simply revisiting similar ones that were made in the same areas a few years ago, and which were

denied because they were based on anecdotal opinion of the animal population and not on scientific data. ADFG found the previous proposals unsubstantiated, and that any decrease in subsistence deer hunting success was due to decreases in subsistence deer hunting effort & purchase of hunting licenses, and not in the availability of animals in which current research indicates populations are high. Please revoke or deny this proposal because it again is based on unfounded ideas. It is important that all Alaska residents continue to have access to hunt on state owned public lands, particularly the areas referenced in the above proposals.

Brandon Ivanowicz

Fw: [EXTERNAL] WP24-04, WP24-05, WP24-06

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:24 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Tuesday, June 27, 2023 2:01 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] WP24-04, WP24-05, WP24-06

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Greg Lockwood <greenhoochie@icloud.com>
Sent: Tuesday, June 27, 2023 12:29 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] WP24-04, WP24-05, WP24-06

Theo,

Please accept this comment for subsistence proposals WP24-04, WP24-05, and WP24-06.

In review of the Federal subsistence EIS as well as ANILCA Title VIII, I believe that the intent of these processes and documents is to focus on maintaining a healthy population of fish and wildlife for harvest while also allowing rural residents subsistence priority. Have there been any re-evaluations to the EIS since the 1992 ROD, it does not appear so on-line? Restrictions to hunting and fishing were predicted to only be needed when resources were below healthy numbers. Human populations have not increased since 1990 in most places in Southeast (SE) Alaska. Because of this, It is difficult to believe that the number of animals impacted has increased as much as was predicted by the EIS. In fact, in many locations in SE, including Pelican, human populations have declined. From what I understand, deer populations in Alaska game management Unit 4 are, according to Alaska Department of Fish and Game, healthier than all other units in the state. The EIS process ended with an alternative that met the purpose of giving subsistence hunting a priority while also claiming to limit the impacts to sport hunting. Shouldn't any regulations that are put into effect meet the same goals as the EIS?
Additionally, I don't believe that anyone reviewing and commenting on the EIS, could predict implementation of regulations that impact sport hunting when there are healthy populations of resource animals. There would have been thick stacks of comments during the EIS if that was known.

It seems that it would be an easy exercise to partner with Alaska F&G to obtain information on the health of the deer herds, amount of impacts due to subsistence hunting compared to predictions in the EIS, and hunting pressure in the area.

Please do not make changes that effect the health and welfare of Alaskans until study work is complete to determine if deer populations are at risk. If they are not at risk, please do not make regulations changes without a new EIS and an opportunity for the public to comment. Anything else would be mismanagement of an Alaska resource without proper authority.

Thanks,
Gwen Lockwood
Greg Lockwood
Juneau Alaska residents and Sunnyside cabin owners

Fw: [EXTERNAL] A few concerns on WP24-04, WP24-05, WP2406

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:21 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Wednesday, June 28, 2023 11:05 AM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] A few concerns on WP24-04, WP24-05, WP2406

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Bob MacKinnon <bob@alaskaelectricllc.com>
Sent: Tuesday, June 27, 2023 2:17 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] A few concerns on WP24-04, WP24-05, WP2406

Hello Mr. Matuskowitz,

I am a lifelong Juneau resident and deer hunter. I find the proposals to close area's WP24-04, 05 and 06 unnecessary. I personally never hunt any of these areas but do worry about what it may mean for setting a precedence. If these zones can be closed for reasons that seem very subjective, (Too many people at certain beaches, No parking, Other hunters make deer skittish etc..) instead of more of a general concern for the deep population then everyone will have these concerns everywhere they go. I know the frustrations of ever increasing populations of people in your hunting areas, however if we go down this road, there is no end to the grips that people will have trying to eliminate other people's opportunities. The deer populations seem very high, there should be no reason why anyone should not be able to obtain their allotted amount each year with a little effort, especially in these areas. Thank you for your consideration,

--

Bob MacKinnon
Alaska Electric
PO Box 33835
Juneau, AK 99803
(907) 988-8080

Fw: [EXTERNAL] Southeast deer proposals

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:28 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Tuesday, June 27, 2023 1:42 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Southeast deer proposals

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Charlie Martelle <martellec@yahoo.com>
Sent: Monday, June 26, 2023 8:37 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Southeast deer proposals

Hello,

I oppose the new proposals for angoon, hoonah, and pelican areas. Southeast hunters have just as much right to hunt these areas as the residents. As a juneau sportsman I have to travel further and hunt and fish harder than the people in these communities. This also costs me more. Residents of these areas can fill their freezers with sustainable, organic meat and fish at a fraction of the cost and effort it takes me or other juneau residents. We all have a right to the land, water, and the resources it provides. Though I don't hunt all of the areas mentioned I have friends and neighbors that do, and they rely on that meat. Also by implementing these rules you would be taking away from an experience and a lifestyle for many, opportunities for youth, and at least with the hoonah road system an opportunity for hunting that is not vessel based. I understand that hoonah residents believe that the juneau hunters are the problem, but they also benefit from the added revenue brought to town during a time of year with economic decline.

I oppose WP24-04,WP24-05, and WP24-06

Charlie Martelle

Sent from Yahoo Mail for iPhone

Fw: [EXTERNAL] opposition to proposals WP24-04, WP24-05, WP24-06

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:26 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Tuesday, June 27, 2023 1:51 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] opposition to proposals WP24-04, WP24-05, WP24-06

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Michelle Morris <umi_4u@hotmail.com>
Sent: Monday, June 26, 2023 12:57 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] opposition to proposals WP24-04, WP24-05, WP24-06

To Federal Subsistence Board:
Attn: Theo Matuskowitz

I am writing a letter of opposition to the proposals WP24-04, WP24-05, WP24-06 to close hunting to everyone except federally qualified subsistence users from November 1-15 in the areas listed.
The reasons cited as obstruction for anchorage or no places to park along the road system are arbitrary. These are public access locations open on a first come basis. There is no reason that local residents cannot use these locations that are being claimed they are being denied access to. Living closer to these locations should actually mean local residents would be able to get to those prime locations first.
Accusations that Juneau hunters are reckless, poor shots, and a safety concern is unfounded and offensive. Living in Juneau does not mean that all residents do not follow a subsistence lifestyle or are irresponsible hunters. I am a hunter from Juneau who helps support my family's food source by hunting and fishing. I hunt in all areas near Juneau and as far as Freshwater Bay on Chichagof Island throughout the season. My family members and friends also hunt for the purpose of meat gathering and take every care to harvest efficiently and responsibly. Many of us have taken or taught hunter education courses, always go to the range before hunting season to check the accuracy of our rifles, wear orange in the field and do the best we can to communicate our location to other hunters or avoid places where we know hunters may be. Accessing these locations by boat can also be dangerous for longer travel and the desire to hunt during the listed time frame are also the same reasons cited by the Southeast Alaska Subsistence Regional Advisory Board.
According to the letters submitted last year by ADF&G in response to similar proposals, members of these communities have actually reported a reduction in effort, however, maintain greater success in hunting, showing that there are plenty of deer for subsistence users to harvest with little effort. Deer populations in GMU 4 consistently have the highest deer pellet counts and other indices suggest the population is stable and sustainable.
I hope the Federal Subsistence Board references the data submitted last year by ADF&G when deliberating these proposals.
Thank you for your consideration.
Michelle Morris
Juneau resident

Fw: [EXTERNAL] proposed hunting closures

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:27 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Tuesday, June 27, 2023 1:44 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] proposed hunting closures

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Richard Morris <akreeldeal@gmail.com>
Sent: Monday, June 26, 2023 8:37 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] proposed hunting closures

Good morning,

I am writing to oppose the proposed hunting closures in Southeast Alaska.
WP24-04 (Southwest Admiralty)
WP24-05 (Hoonah Area / NCCUA)
WP24-06 (Pelican Area / Lisianski Inlet)

There are several reasons that I oppose these closures. First and foremost is that the Alaska Dept. of Fish and game did a lengthy study and found that deer populations and hunter success has been improving throughout the area. Secondly, looking at some of the specific reasons that they want them closed are laughable. I am not sure that the locals don't miss any shots. I like to think that all hunters, whether from Juneau or one of the villages, try their best to shoot and kill the deer as accurately and humanely as possible. If the Juneau hunters were to anchor in less favorable areas would that make it better for them? I am not sure how the hunters make it a public safety concern in Hoonah, and similarly not sure how many Juneau residents take their cars over and take up all the parking along the miles of logging roads on Chichagof island.
When it comes to the Hoonah area, I bought land and built a cabin specifically to hunt the area. This proposal would prevent me from doing the one thing I bought the property for. Are there going to be exemptions to allow property owners to still hunt in the area even if they are Juneau residents?
I hate to say it, but really all this proposal is trying to accomplish is to reduce the amount of hunters so that the locals don't need to put as much effort into the hunt. It is well known that Hoonah's hunters like to run the roads and shoot deer. Angoon residents hunt deer year round. Interesting how there is very little harvest data from the residents and that there were very few deer tags requested from the local hunters.
I also don't care for the proposal to close the hunt for the first two weeks in November. This is obviously the rut, and most Juneau hunters are looking for big bucks at that time. Both sexes are open for hunting and does come running in more than bucks do. There is plenty of opportunity for everyone to harvest their trophy or meat deer.
On a final note, Juneau residents can not hunt in January. This is the easiest time of year for hunting deer. They are all down low and close to the beach or on the beach eating kelp. This provides an easy opportunity for locals to harvest deer.

Thanks for your time hearing about why I oppose these propositions. Again, please refer back to the ADF&G report on Sitka Blacktail and base this off of science.

Cheers,
Rich Morris

Fw: [EXTERNAL] Deer hunting proposals

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:30 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Tuesday, June 27, 2023 1:29 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Deer hunting proposals

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: mniz@gci.net <mniz@gci.net>
Sent: Sunday, June 25, 2023 9:05 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Deer hunting proposals

I oppose the following proposals (WP24-04, WP24-05, and WP24-06).

My family has been hunting in these areas for three decades. I totally object to the reasoning for these new proposals,
the arguments are simply not valid. When we are hunting in these areas we seldom see any other people.
Most of the hunting traffic we see are those that are trolling the beaches looking for an easy deer to shoot from their boats.
As a long time user of these areas I oppose these proposed regulations they are unwarranted.

Mike Nizich

Fw: [EXTERNAL] submission of comments on WP24-04, WP24-05, WP24-06

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:18 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Friday, June 30, 2023 3:26 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] submission of comments on WP24-04, WP24-05, WP24-06

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Nicholas Orr <nicholasporr@yahoo.com>
Sent: Friday, June 30, 2023 8:59 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] submission of comments on WP24-04, WP24-05, WP24-06

Attn: Theo Matuskowitz

Please accept this email as my public comment in opposition to the federal Unit 4 deer proposals (WP24-04, WP24-05, WP24-06) to be considered at the Oct 2023 meeting. I understand that the proposal's authors wish to ensure significant and meaningful priority is afforded to all Federally Qualified Users (FQUs). However, FQUs already have significant and meaningful priority through their exclusive January season as well as the Federally Designated Hunter Program. I also disagree with the claim of the proposal's authors that non-federally qualified users are impeding or causing FQUs to have difficulties meeting their subsistence needs. In considering the Unit 4 deer proposals from 2022, the Federal Subsistence Board heard testimony to this effect and declined to pass those proposals. Finally, data from ADF&G does not show a decline in FQU success rates in any of the proposed areas.

Thanks
Nicholas Orr

Fw: [EXTERNAL] Comment on Proposals WP24-04, WP24-05 and WP24-06

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:26 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Tuesday, June 27, 2023 1:49 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Comment on Proposals WP24-04, WP24-05 and WP24-06

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: James Parkin <jwparkin4@gmail.com>
Sent: Monday, June 26, 2023 12:49 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Comment on Proposals WP24-04, WP24-05 and WP24-06

I am a 30 year resident of Angoon.

I oppose these proposals (WP24-04, WP24-05, and WP24-06) because they would negatively affect Families and they are not necessary because other conservation methods would be more beneficial". There are many family members of rural communities that have moved to Juneau for work, but return home to visit and hunt. These are precious reunions which would be reduced if these proposals passed.
Targeting bucks is a good conservation method annd the rut is the best time to do that. Often however, rural residents will target does because they have more fat during the rut. This is true, but, perhaps education could be provided to rural communities as to the negative affect on overall deer numbers caused by targeting does. I am not suggesting closing or reducing doe hunting. That won't work! Knowledge and changing individual minds is the best chance for lasting change.

Thank you for you time

Sent from my iPhone

Fw: [EXTERNAL] Attn Theo Matuskowitz

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:19 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Thursday, June 29, 2023 1:19 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Attn Theo Matuskowitz

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Ben Pinney <benpinney@gmail.com>
Sent: Thursday, June 29, 2023 10:56 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Attn Theo Matuskowitz

Hello, I'm writing to voice my objection to

WP24-04
WP24-05
WP24-06

My name is Ben Pinney and I am the Southeast director for the Alaska Bowhunters Association. While I speak only for myself and not directly for the ABA as this is not specifically bowhunting related, I do know quite a few hunters in Juneau. And Bowhunters throughout southeast and I have not heard one single instance that supports the reasons stated for these proposals.

I object to all above proposals as they are simply subjective statements not based on true data. NO hunting opportunities should be closed down without basing the decision on objective facts.
Rebuttal to specific reason #1) Juneau residents may miss deer. Do we have any data on what that percentage that actually is? Also, do we know that it is any more significant than "local hunters" one could just as easily claim that local hunters miss deer more and this make the hunting more difficult for non locals.
Rebuttal to #2) Juneau Hunter anchor in all the best anchorage's this restricting access, where are all the best anchorages? How many "best" anchorages are there? What percent of the time has this actually occurred? 1 day out of the year or 20? There's a lot of missing facts on this one.

Rebuttal to #3 Juneau hunters are causing a public safety concern in Hoonah. Let's see the numbers clearly there must be documented public safety incidents that have happened. How many more incidents are due to Juneau hunters be local hunters? Again, let's see the facts.

Rebuttal to #4. Hoonah residents can't find a place to park due to so many Juneau residents. Once again, how many parking spots are there along the many miles of Hoonah roads? How many are truly taken up by Juneau residents. How is this hunter able to differentiate a Juneau car from a non local car every single time a vehicle is parked in the exact same spot that said person wants to park in?

There is a clear lack of data here and if we look at the most recent formation out out by fish and game regarding this subject, it is low local Hunter recruitment that is causing a lack of deer taken by locals vs non locals. The deer numbers are not being harmed by Juneau hunters. Fish and game has this data and I hope you will be making informed, clear fact based decisions.

Pls Vote no to all proposals WP24-4,5 and 6
Until there is clear objective data that is significant.

Thank you for your consideration,
Ben Pinney

Sent from my iPhone

Fw: [EXTERNAL] proposed hunting closures

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:20 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

1 attachments (13 KB)
Alex Reid.vcf;

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Wednesday, June 28, 2023 11:59 AM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] proposed hunting closures

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Alex Reid <areid@lynden.com>
Sent: Wednesday, June 28, 2023 10:56 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] proposed hunting closures

I oppose these proposals WP24-04, WP24-05, and WP24-06 because they are not necessary and are completely one sided. This is the equivalent of me trying to shut down Costco to all the rural communities because they take up to much parking or buy the groceries I want. All hunter deserve the same rights.

Alex Reid
Alaska Marine Trucking, LLC
Maintenance Manager

(907) 463-3030 Work
(907) 723-7547 Mobile
areid@lynden.com
100 Mt. Roberts Street
Juneau, AK 99801

Fw: [EXTERNAL] Comments

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:29 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Tuesday, June 27, 2023 1:32 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Comments

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Kaye Sullivan <ak.kayesullivan@gmail.com>
Sent: Sunday, June 25, 2023 12:40 PM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Comments

Theo Matuskowitz

I oppose these proposals (WP24-04, WP24-05, and WP24-06) because they are not necessary.

Thank you
Catherine Sullivan

Fw: [EXTERNAL] Commenting on Proposed Changes to Federal Hunting and Trapping Regulations

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:32 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Thursday, June 22, 2023 2:35 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Commenting on Proposed Changes to Federal Hunting and Trapping Regulations

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Joel Teune <joel_teune@hotmail.com>
Sent: Thursday, June 22, 2023 10:10 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Commenting on Proposed Changes to Federal Hunting and Trapping Regulations

Theo,

Thank you for taking these comments. My comments are in regard to WP24-04,05,06.

I would like to start off by saying that I have not, nor do I intend to, hunt these areas; but I have faced similar Federal Subsistence changes for deer in Unit 2 near where I live. My stance then is the same now.

I do not support the proposed changes. I believe Alaska - rural or nonrural - is a tough place to live and has higher costs of living than the rest of continental U.S. Many Alaskans, like myself, do a fair bit of hunting and fishing for a number of reasons including recreation, high quality food, and to offset the higher costs of food at grocery stores. Since we are all privileged to live in a mostly free country, if I determine that my financial situation is not sustainable, I can relocate to a different area to improve my economic standing (higher paying job, lower cost of living, etc.). What I do not get to do is advocate limiting the rights of others using the words "subsistence" and "rural". In our day and age of "Amazon super saver shipping", I don't see the logic as valid. As a resident of the State of Alaska, I expect maximum access to opportunities to harvest game in ANY area of the State in which I reside. The best part about this, is everyone in the State gets equal access. If someone from Barrow wants to venture down to Unit 1A and hunt deer, excellent. If I want to venture to the interior and harvest Dall Sheep, excellent. Everyone has equal access - which means equal seasons, bag limits, etc.

I find it very undemocratic that the only say I get on these proposed changes (that affect a large number of people) is an email comment. I don't get to vote; I don't get any more than a comment.

Thanks for your time.

Joel Teune

Fw: [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06

Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Thu 7/6/2023 12:25 PM
To:Mckinney, Kayla T <kayla_mckinney@fws.gov>

Theo Matuskowitz
Supervisory Regulations Specialist
US Fish and Wildlife Service
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, AK 99503-6199
~~*Office: (907) 786-3867*~~
Telework: (907) 786-3888
FAX (907) 786-3898
theo_matuskowitz@fws.gov

From: Shavings, Bernard <bernard_shavings@fws.gov> on behalf of AK Subsistence, FW7 <subsistence@fws.gov>
Sent: Tuesday, June 27, 2023 1:56 PM
To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>
Subject: Fw: [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Walker, Jesse <JWalker@coeur.com>
Sent: Tuesday, June 27, 2023 7:01 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Comments: WP24-04; WP24-05; WP24-06

Mr Matuskowitz,

I am a lifelong Juneau resident and deer hunter. I mainly hunt in Tenakee inlet and on Admiralty Island. I am writing to express opposition to proposals WP24-04, WP24-05, and WP24-06. These proposals are largely similar to proposals that have been submitted and have failed in recent years. I would urge the OSM to reject these proposals on the same grounds that the previous proposals failed. They are wholly unnecessary. Thank you for considering my comments.

Jesse Walker,
Juneau Alaska

June 29, 2023

ATTN: Theo Matuskowitz,

I find it hard to believe we are here again after last year's discriminatory and unscientific proposals (WP-22-7, WP22-08, and WP22-09). The resources that were spent to contest the proposals are real dollars and to see another set of proposals so similar which are based on **subjective statements** and **emotions** is alarming. I once again **strongly disagree** with the current proposals – WP24-04 – WP25-05 – WP26-06 and find the proposed restrictions potentially stressful on Juneau hunters, unnecessary, and polarizing. I also feel those who keep bringing these proposals forward need to be held accountable to repay the monetary resources that are spent to refute.

- ✓ **Juneau residents may miss deer, causing deer to be skittish** – There is no verifiable data on the shooting accuracy of Juneau hunters versus others or the measurable correlation of missing a deer and the future productivity of a geographic area. I have personally harvested deer in the same location multiple times throughout a hunting season.
- ✓ **Juneau hunters obstruct access by taking best anchorages** – what constitutes a "best anchorage"? How many are there? Has someone actually looked up the registrations of these boats to verify where the owners are from? Perhaps there from Haines, Skagway, Gustavus? I would also argue that rural residents unequivocally have the advantage to all the best access because they live there. Furthermore, they do not have the burden to travel in November from Juneau. More often than not southern Lynn Canal, Icy Strait, and Northern Chatham are unsafe for travel. If you restrict hunting access to a calendar in November it may be the only week or two it's even possible to safely navigate the treacherous water ways. In other words when the weather allows you to travel we need to go!
- ✓ **Juneau hunters are causing a safety concern** – Limiting access and congregating Juneau hunters will actually help create a safety concern. What's next shall Juneau resident's discriminate against Alaskan neighbors based solely on their zip code from going to Juneau? Restricting their movement and access to Costco/ Fred Meyers / Western Auto during peak shopping times? One could arguably make the same case because of the increase in car traffic they are ruining our carbon footprint. Taking the best parking spots, and creating a public safety concern on our highways. Not to mention the air we breathe and the increase probability they could spread COVID or another unwanted safety risk. This type of radical thinking has no end and needs to be abolished.
- ✓ **Juneau hunters are not allowing parking spaces to hunt in HNH**– This is probably the most ridiculous of all the proposals. It's obvious whoever wrote this does not actually travel the logging road infrastructure that is in place surrounding Hoonah on Chichagof Island. The opportunities to get out of your vehicle and hunt are limitless simply by pulling off to the side of the road.

In conclusion we need to stop playing politics and listen to the wisdom from Alaska Department of Fish & Game's conclusion to WP-22-7, WP22-08, and WP22-09 **"after examining decades of data, the Alaska Department of Fish and Game's Division of Wildlife and Conservation concluded that the hunting regulation changes are not needed and would unnecessarily deprive some hunters of opportunity."** I am hopeful this will once again be the outcome to these new proposals.

Sincerely,

Adam S. Anderson
16671 Ocean View Drive
Juneau, AK 99801

June, 23, 2023

TO:
Federal Subsistence Board - Attn: Theo Matuskowitz
Office of Subsistence Management
1011 East Tudor Road, MS-121
Anchorage, AK 99503-6199
subsistence@fws.gov

Southeast Subsistence Regional Advisory Council
c/o DeAnna Perry
P.O. Box 21628
Juneau, AK 99802
Phone: 907-209-7817; E-mail: deanna.perry@usda.gov

FROM:
Roger Harding
1785 Mendenhall Peninsula Road
Juneau AK 99801

Re: WP 24-06 (Primarily) but also WP24-04 and WP24-05

Dear Southeast Subsistence Regional Advisory Council:

I am writing these comments to express my opposition to WP24-06, but my comments are also germane for WP24-04, WP24-05. This proposal seeks to reduce the opportunity of non-federally qualified users (NFQU) to participate in Lisianski Inlet deer hunting. The Alaska Deptartment of Fish and Game (ADFG; issued June 7, 2021) has made it abundantly clear that there is no conservation concern for deer in the Lisianski Inlet area, and the available data indicates that deer populations in the area remain abundant. Furthermore, the best available data suggests that it is unlikely that hunter harvest has reduced deer abundance in this area.

The proposal specifically seeks to "eliminate competition" during the prime deer hunting period to only FQU in the Pelican area. Not only is this time of year arguably the best, and some of the "most efficient" hunting times for harvesting deer, it is also the prime time for hunters to participate, including non FQUs. Traditionally, this is a time of year when family and friends get together in Pelican to hunt and spend time together around the Thanksgiving holiday. There are many families and groups of friends who have spent part of their lives in Pelican but have had to move elsewhere for medical, education, or economic reasons. Imagine a scenario where a family and their friends gather in Pelican for Thanksgiving and to hunt, just as they have for many years. However, if this proposal is adopted not everyone in the family would be eligible to legally hunt deer. If adopted, this proposal could fracture long-time bonds of many traditional hunting groups and generations of family and friends who have hunted together for years.

If the intent of this proposal is to eliminate non-Pelican based hunters, then I think this proposal will fall short, as FQU from Haines, Gustavus and Sitka would still be allowed to hunt during the proposed time closure. There are of course hunters who do come from Juneau (like myself), and they often have deep

roots or economic or personal connection to Pelican. If this proposal is adopted and this logic is applied to other resources that become harder or more time consuming to harvest, then only FQU would be allowed to harvest, salmon, rockfish, or shrimp in the Pelican area at the peak of their seasons. Is this the road or direction the Federal Subsistence Board wants to go down?

While I do not endorse the following suggestions, I am including them only as possible alternatives to reduce the feeling of competition:

1) In order to avoid competition from NFQU, allow only FQU to hunt on every Wednesday from Aug 1 – Dec 31. This would provide an opportunity to hunt without competition throughout the season.
2) Install mooring buoys (USFS or others) in areas where anchoring a skiff can be problematic during deer hunts. This could open up more areas for all hunters throughout the season.
3) Allow NFQU to hunt during January if the two week closure in November is adopted.
4) Go through the Board of Game process to limit the number of guided deer hunts in the Pelican area.
5) Allow only one or two deer to be harvested per NFQU in the Pelican area during the proposed time frame. This might reduce the perceived believe that dozens of deer are being harvested by non-FQU hunters.

I fully support the concept that FQUs should have priority for the resources needed to ensure that rural residents can feed their families and continue to live in rural areas. However, changes to the Federal Subsistence Management are only allowed and necessary when there are conservation concerns for these resources, and this is certainly not the case for deer in the Lisanski area.

I have owned property within the City of Pelican for the last 25 years (33019 Whiskey Flats), paid my property taxes, and enjoyed the hunting and fishing opportunities available in Lisianski Inlet. While my principal residence may be in Juneau, the best part of having property in Pelican is the enjoyment of being part of the wonderful community of people who live in the Lisianski Inlet. If a conservation concern for deer populations in the area ever did occur, I would absolutely support a proposal to limit harvest by NFQUs, but that is not the case right now.

The comments I have provided in opposition to WP24-06 are based upon data and analysis that clearly shows there is no conservation concern for deer populations in Lisianski Inlet. My comments also apply in opposition to WP24-05 and WP24-04, which have also shown no conservation concerns, and if passed, would limit opportunities for NFQU hunters to harvest deer on Admiralty Island as well as in the Pelican area. All of these proposals are contrary to ANILCA Section 816(b), and if adopted, would cause undue hardship to Alaskans from Juneau, Ketchikan, and other areas outside of Southeast Alaska, as well as non-resident deer hunters. The intent of the ANILICA was to ensure a subsistence priority and restricting deer harvests opportunities by NFQUs is only authorized for the conservation of healthy populations. If adopted, these proposals would not follow the intent of ANILCA as directed by Congress.

Thank you for the opportunity to comment on these proposals.

Sincerely,

Roger Harding

To whom it may concern,

I am writing in regards to the following proposals:

Admiralty: WP24-04
Chichagof (Hoonah): WP24-05
Lisianski (Pelican): WP24-06

I am a lifelong Alaskan who lives in Juneau. I hunt in the Pelican area described in the proposal, but would like to speak to all of the proposals. I would suggest, as someone who hunts the Pelican area every year for last ~10 years, that the last few years have been much more difficult to harvest deer during the fall. This has likely caused these communities for look for someone to blame. Juneau (or non-local) hunters are an easy target; however, I do not believe the correct one.

I am deeply sympathetic to the needs of individuals living in the small communities of Southeast Alaska. The hardships endured by these folks are very real. However, I do not see limiting hunting access as a solution. Every study that has ever looked at the topic has found that hunter predation on the Sitka Blacktail Deer population in Southeast Alaska has found that hunting is an insignificant contribution to loss of deer. I certainly understand that it would be challenging for a local from any of these communities to see hunters not from their town leaving with deer, when they themselves haven't been able to harvest deer.

I believe the explanation for the apparent "shortage" of deer has been warmer winter weather not producing as much snow, especially in the early season. For many of these small communities, hunting is performed by driving a boat around looking for deer on beaches. Without enough snow to drive the deer down off of the mountains, I have seen less deer on beaches in the last few years. However, if one is willing to go into the woods, there are plenty of deer to be found at higher elevations. This matches with any of the recent deer surveys suggesting there are no major drops in deer populations in these regions.

I believe that these smaller communities hope for plentiful, easy to shoot deer on the beaches will not happen regardless of whether these proposals are passed or not. It will depend more on whether there are early and heavy snowfalls. I would respectfully request that you reject all of these proposals as I believe they would not address the proposed concerns, and would unfairly limit one group of Alaskan's access to a plentiful resource.

-Justin Dorn
Juneau, Alaska

From: Wessels, Katerina on behalf of AK Subsistence, FW7
To: deanna.perry@usda.gov; Roberts, Jason S
Subject: Fw: [EXTERNAL] Deer closure comment for Southeast Alaska
Date: Wednesday, October 25, 2023 2:19:12 PM

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: cjs16@me.com <cjs16@me.com>
Sent: Wednesday, October 25, 2023 11:29 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Deer closure comment for Southeast Alaska

All people can equally compete for deer in Southeast Alaska on Federal and State Lands. That is fair to all hunters wishing to live a subsistence lifestyle, regardless of their address.

Some communities already have extended seasons for deer harvest to shoot deer when they are the most vulnerable, in January.

The biggest killer of deer in Southeast Alaska is Winter.

If anything, if there are less deer near Angoon or Hoonah it is most likely that they are shooting any deer possible during January, with no regard to age or sex. Killing female deer and immature deer is a sure way to decrease next year's opportunity to shoot more bucks and larger deer.

I oppose any subsistence priority based on race, gender or address.

Respectfully,
CHARLES SCHULTZ
Juneau, Alaska
Lifetime Sportsman

From: Wessels, Katerina on behalf of AK Subsistence, FW7
To: Roberts, Jason S
Subject: Fw: [EXTERNAL] Deer closures
Date: Wednesday, October 25, 2023 10:19:56 AM

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Richard Morris <akreeldeal@gmail.com>
Sent: Wednesday, October 25, 2023 10:05 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Deer closures

I am against any deer closures. ADF&G has been researching blacktails and the numbers show there are plenty of deer available to all hunters.

Rich Morris

From: Wessels, Katerina on behalf of AK Subsistence, FW7
To: deanna.perry@usda.gov; Roberts, Jason S
Subject: Fw: [EXTERNAL] Deer Proposals
Date: Wednesday, October 25, 2023 10:20:20 AM
Attachments: phone-icon_b10a4f93-3b6d-4672-a720-bdf7bf8ae0d47.png
email-icon_b036995c-0d20-424f-b622-f3f8ad76f4ee.png
website-icon_0bbf9725-79ae-4ff2-9734-0c3c77afccd6.png
In_8da45c43-90fb-4465-b82d-5801f796b286.png

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: John DeMuth <jdemuth@pndengineers.com>
Sent: Wednesday, October 25, 2023 10:10 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Deer Proposals

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

SRAC,

I am writing to voice my opposition to the proposed deer closures, as specifically identified in WP24-04, 05 and 06. As was the case with the previous, similar proposals, these are political in nature and represent subjective opinions of a small, select group that is in complete contrast and contrary to all available scientific and biological evidence which is why ADFG opposes these as well. I ask that common sense be used to consider the benefit of all Alaskans and not give-in to the special interest groups pushing these proposals.

Best Regards,

John DeMuth, PE, SE | Vice President
9360 Glacier Highway, Suite 100, Juneau, AK 99801
(O) 907.586.2093 | (M) 907.321.1645

From: Wessels, Katerina on behalf of AK Subsistence, FW7
To: deanna.perry@usda.gov; Roberts, Jason S
Subject: Fw: [EXTERNAL] Proposed Deer Hunting Closures
Date: Wednesday, October 25, 2023 10:19:19 AM

Office of Subsistence Management
U.S. Fish and Wildlife Service - R7
1011 E Tudor Rd, MS 121
Anchorage, AK 99503-6199

(907) 786-3888 phone
(907) 786-3898 fax

Website: https://www.doi.gov/subsistence
Like us on Facebook! www.facebook.com/subsistencealaska

From: Alex Reid <reid.alex.907@gmail.com>
Sent: Wednesday, October 25, 2023 10:06 AM
To: AK Subsistence, FW7 <subsistence@fws.gov>
Subject: [EXTERNAL] Proposed Deer Hunting Closures

This email is in regards to the proposed closure for deer hunting:
WP24-04 - Angoon deer closure
WP24-05 - Hoonah deer closure
WP24-06 - Pelican deer closure

I would like to state that I am against these proposed closures. ADG&G has performed studies and proven that claims made in support are completely unfounded and emotionally charged. They have no scientific backing. Why make a decision that will damage inter-community relationships if there will not be any benefits. Giving one group more rights than another creates division among Alaskans. Individuals who live in these communities already have a major advantage in hunting these areas and with minimal effort can fill their tags. It is much more difficult for hunters from Juneau to fill their tags, it is far better to let hunters come into these communities and support the local economy.

10/24/23 RAC meeting #6 mute #5 talk 1

Thankyou mr Chair -

Hello- Thank you for this opportunity to comment.

I'm Mike Bethers, a 75 yr old lifelong deer hunter from Kake Bay. I ~~have spent~~ about 50 days a fall hunting deer on Admiralty and Chichagof with most of my effort in Tenakee. I haven't been on the Hoonah roadsystem in decades. Never shot a deer near the road, from a vehicle or boat. I like to hunt deer ~~on their own ground~~ in the woods and still hunt and use a call. I have ~~been getting~~ all the deer my family needs and I let many more deer walk away.

IF an old guy in my condition can do this - I can't understand why FQ hunters are not taking advantage of the currently robust deer populations. Instead of taking advantage of their current priorities and putting meat in the freezer, FQ hunters are coming up with unjustifiable proposals that would really foul up deer hunting for me and ~~other~~ NFQ hunters.

Very similar

Subsistence deer proposals 22-07, 22-08 and 22-10 were ~~recently~~ defeated earlier this year because available data showed that

1- decreased FQ harvest was not due to competition from NFQ hunters from Juno but rather to documented reduced ~~lack~~ of hunting effort in Angoon, Hoonah and Pelican - and

↓

2

2- There is absolutely no shortage of deer or no known conservation concerns - and

3- Proposed closures would actually cause increased conflict between FQ and NFQ hunters on state tidelands

These current proposals, WP-24-04, 24-05 and WP24-06 should also be withdrawn or defeated ASAP because -

1- There is no apparent increase in FQ hunting effort or obvious attempts to increase FQ deer harvests - and -

2- Deer populations in NSE are at or near carrying capacity and near all time highs - theres even more deer this yr than last year.

What is a "meaningful priority"? If current priorities aren't "meaningful" what is? FQ hunters already have -

1) Seven full months (over ½ the yr) to legally hunt deer - 1 month over NFQ

2) Designated hunter program so FQ don't have to shoot their own deer and -

3) FQ hunters live right in the hunting areas where deer are readily available

FQ hunters submitting these proposals allready have significant priorities and they are not taking advantage of them. ~~an expending additional effort to put meat in the freezer.~~

3

Please note that all three communities submitting these proposals already have the best (most efficient) deer hunting in the state of Alaska

Specific comments for Angoon WP 24-04

Angoons population has dropped 38%. FQ deer harvest has dropped 37% since 2007. The number of hunters is down 23% and overall hunting effort down 43%. Hunting effort is clearly down, however, Angoon hunters who prior to 2006 took 2.1 days to harvest a deer now need only 1.9 days. - Just about the most successful deer hunting in the state.

Angoon proposes to close a very large area to NQ hunters, but only 25% of their annual harvest comes from this area. Obviously, Angoon hunters travel much farther to hunt even with high fuel + travel costs.

Aerial alpine deer surveys this summer showed the highest deer counts on southern Admiralty. Also, two parties I know who made alpine hunts in the proposed closure saw more deer than ever before.

Also, the average of 29 NQ hunters hunting Angoon are likey property owners or have ties with Angoon residents.

↓

An average of 36 non-Angoon hunters hunt this area annually and its been stable for 25yrs There is not a big fleet of NQ hunters randomly travelling to Angoon to hunt deer

Another observation shows that subsistence/pers use fishing permits issued in Angoon has dropped 60+% since 2013. It looks like a significant reduction in Angoon subsistence fishing and hunting activity

Specific Comments for Hoonah WP24-05

From 2013 – 2022 the number of active FQ Hoonah hunters dropped 23%, and total hunting effort in days dropped 54%, even though population increased (8%).

Hoonah pretty well Gut shot its local wildlife habitat and hunting area by building miles of roads and clearcutting thousands of acres of excellent deer/wildlife habitat. Now the long term impacts is what we must deal with. The roads and new clearcuts made deer hunting very easy, but now when clearcuts have grown up, and after shooting many generations of road/ditch dwelling deer, things are different. Locals tell me that soon after doe seasons that deer get scarce along the roads. Surviving deer now live in the woods – off the roads.

Local Hoonah hunters climbing hills and hunting timber away from the roads tell me they have no problem getting all the meat they need. Actually, Hoonah hunters still getting out there are having better success than in the past. This summers aerial deer surveys showed very high numbers of deer on mountain tops near Hoonah.

The great numbers of NFQ hunters reported flocking to Hoonah likely includes non-local FQ hunters as well. The number of non-local hunters using Hoonah has actually dropped 20% from 2013-2022. Reduced ferry service may have something to do with this.

Also note that eventhough Hoonah population has increased 8%, the number subsistence/pers use fishing permits has dropped 40% since 2013. It looks like interest in hunting and fishing in the villages is dropping. I wonder what modern Technology and interests of our young people have to do with this?

Specific Comments for Pelican WP 24-06

Pelicans population has dropped 40%. The number of

hunters is down 35% and hunter effort in hunter days is down 53%. Pelican hunters have the best documented deer hunting in SE AK, but with so few hunters, how do they expect harvests of decades ago?

In Conclusion

FQ hunters don't need any increased priority to the deer resource. They already have a month longer season than NQ hunters which makes a 7 month long season. FQ hunters can easily use designated hunters to shoot their deer. FQ hunters live in villages located right in the hunting areas – and contacts living in the villages tell me that there are deer also living in the villages.

FQ hunting effort in Angoon, Hoonah and Pelican remains down 43% to 53% from days past while deer populations are at the top of the chart. There are simply not enough NFQ hunters hunting any of the proposed closure areas to impact local FQ deer harvest.

Give the current robust deer populations, lack of FQ hunter effort and potential conflict that proposed closures would cause between FQ and NFQ hunters, there is not legal justification available in ANILCA to support the proposals

7

WP 24-04, 24-05 and 24-06 should be rejected at the earliest opportunity

It looks like hunting and fishing may be losing interest in the villages. I would suggest that hunting, fishing and subsistence methods be injected into locals schools to promote this life style in the communities.

Keep in mind that Angoon, Hoonah and Relican already have the best deer hunting in the state. However, why don't they propose to extend the "real" subsistence season two weeks into February? This would not have any impact on NR hunters and FR could have exclusive use of the resource on the beach where they could be harvested in a most efficient manner. Doe's fetus's may be a little larger, however, shooting a pregnant doe in early February would be no different than shooting her in mid December.

RHAK
Resident Hunters of Alaska
unapologetically FOR ALASKAN RESIDENTS
PO Box 60005, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

June 21, 2023

To: Federal Subsistence Board

Re: 2024-2026 Wildlife Proposals

Dear Chair Jacobson and members of the Federal Subsistence Board,

Below are comments from Resident Hunters of Alaska (RHAK) on Wildlife Proposals before the board for the 2024-2026 regulatory years.

Wildlife Proposal 24-03 – close a portion of Unit 1C, remainder (RG015 permit area) to goat hunting by non-Federally qualified users from Aug 1 – 31.

OPPOSE

*(Board members please note that Unit 1C Remainder is the RG 013 permit area, **not** the RG 015 permit area described in the proposal. Unit 1C Remainder under the RG 013 permit already had season dates for goat Aug 1 – Nov 30.*

We believe the proponent of this proposal means the RG 015 permit area in Unit 1C, drainages of the Chilkat Range south of the south bank of the Endicott River.)

As the proponent of WP 24-03 correctly states, the Board of Game at their Southeast meeting in 2023 passed proposal 31 from Resident Hunters of Alaska that expanded the Unit 1C goat registration hunt RG 015 permit season to Aug 1 – Nov. 30. This change aligns the season dates on the north end of the Chilkat Range with the southern end. In no way does this expanded RG 015 season take away from subsistence goat hunting opportunities or prevent subsistence hunters from harvesting a goat.

A "preference" to federally qualified users does not mean there needs to be an absence of NFQU opportunities, which the proponent of this proposal advocates. Competition alone is not a valid reason to restrict NFQU.

Alaska Department of Fish & Game data shows that over the past five years there has been an average harvest of 3 -9 goats on the entire Chilkat Peninsula, with few nannies being taken. Goats on the Chilkat Peninsula have increased from the lows of the past and current harvest quotas are not being reached. There is no reason to restrict NFQU during Aug 1 – 31.

Wildlife Proposals 24-28 and 24-29 (which we support!) seek to lower the caribou bag limit and allowance to take so many cows for all users on federal lands within the WACH's range and should either of those pass we believe they will help protect cows, allow the herd to begin to rebound, and make a permanent caribou hunting closure to NFQU unnecessary.

As the herd increases, these temporary caribou hunting closures to NFQU should be rescinded.

Wildlife Proposal WP 24-26 – extend the temporary Dall sheep hunting closure for all users on federal lands in Unit 24B and 26B west of the Sagavanirktok River through the 2024-2026 cycle

OPPOSE

We respectfully request that the board defer this proposal, as the Board of Game will be meeting in March 2024 to deliberate on proposals that if passed will address sheep conservation concerns in the central Brooks Range and imposing limits on nonresident sheep hunters.

As stated in our previous comments, RHAK is very concerned about sheep declines across the state, especially state regulations that allow unlimited nonresident sheep hunting, which requires hiring of a guide. There are proposals before the Board of Game seeking to limit or restrict nonresident sheep hunters in Units 24B and 26B who account for over 40% of the harvest of sheep in these areas.

The FSB does not have the authority to limit only nonresident non-local sheep hunters, and we do not believe resident sheep hunters need to be restricted in these units. These areas are one of the only road-accessible areas where resident sheep hunters can access the sheep, and they are primarily restricted to archery-only hunting (with a very low success rate) within the Dalton Highway Corridor Management Area.

Wildlife Proposals 24-04, 24-05, & 24-06 – close portions of federal lands on Admiralty and Chichagof Islands to deer hunting by NFQU from Nov 1 – 15

OPPOSE

These 3 proposals are essentially do-overs of those that were not passed by the board in 2023, and the rationale the board used to deny those deer hunting restrictions to NFQU on portions of the ABC Islands in Unit 4 last year very much still applies to these proposals.

Data from the Alaska Department of Fish & Game debunked claims in proposals heard by the board in 2023 that deer populations in Unit 4 were down. Deer populations in Unit 4 are abundant and healthy and near carrying capacity. And there was absolutely no real evidence by proponents of deer hunting restrictions on NFQU that subsistence needs were not being met,

The same applies to these proposals before the board for the 2024-2026 cycle.

As to evidence of subsistence needs not being met, we again did not see any such evidence in Wildlife Proposals 24-04, 24-05, or 24-06. NFQU are ***not*** "obstructing access," nor are they altering deer behavior, as stated in WP 24-04. The one factual statement in WP 24-04 is that NFQU compete with locals for the deer resource. But that does not mean that such competition prevents subsistence needs from being met during the peak of the rut Nov 1 -15, which is when proponents of these proposals want non-local deer hunters restricted.

As mentioned in our RHAK testimony before the board last year, "competition" alone is not a valid reason under ANILCA guidelines to restrict NFQU. We explained that of course every hunter would like it if he or she was the only one in the field, but that is not a valid reason to restrict others. We also mentioned that the opportunity to hunt is never a guarantee that one will be successful. One individual hunter who may not have been as successful as he or she was in the past is not at all an example that subsistence needs are not being met.

We urge the board not to set precedent by passing these proposals that would essentially use "competition" alone as the rationale for restrictions on NFQU. Without concrete evidence that subsistence needs are not being met because non-locals are allowed to hunt during the same period as locals, these proposals should be voted down.

Thank you board members for your attention to our comments.
Sincerely,
Mark Richards
Executive Director Resident Hunters of Alaska
www.residenthuntersofalaska.org

Follow and “Like” us on Facebook!
www.facebook.com/subsistencealaska