



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

January 17, 2025

Doug Vincent-Lang
Commissioner, Department of Fish and Game
State of Alaska
1255 West 8th Street
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Commissioner Vincent-Lang,

Thank you for your November 13, 2024, letter expressing concerns regarding the final boundaries of the November 1-10 closure of deer hunting to non-federally qualified subsistence users in Unit 4 near the community of Angoon in Southeast Alaska. I am responding on behalf of Secretary of the Interior Deb Haaland and Secretary of Agriculture Tom Vilsack.

The Federal Subsistence Management Program, including the Office of Subsistence Management (OSM), is dedicated to ensuring a rigorous public process that engages the knowledge and guidance of regional experts and ensures accurate promulgation and implementation of regulations. While ambiguity can arise between Board and Council motions, or between information presented in analyses and during meetings, the regulatory process ultimately is sound. OSM is committed to ensuring that standard procedures for regulation promulgation are followed.

In this case, there will be no change to the regulatory boundary for the Angoon closure at this time. A review of the administrative record shows that during Council and Board discussions, both the wildlife analysis area and the legal description adopted in the final rule were referenced at different times by different members. Thus, there may not have been a common understanding by the public or decision-makers concerning the geographic scope of the proposed regulation. For this reason, it would have been inappropriate for OSM to initiate unilaterally an administrative correction. Rather, a renewed public process will be necessary to implement any change to the regulation.

The Board requires a review of each Federal subsistence closure every four years to determine their continued need. The Unit 4 deer closures are scheduled to be reviewed in April 2028 per this policy, and each closure will include a full staff analysis. Additionally, any person adversely affected by a new Federal subsistence regulation may request the Board to reconsider its decision by filing a Request for Reconsideration in writing within 60 days after a regulation takes effect or is published in the Federal Register, whichever comes first.

Should the Alaska Department of Fish and Game wish to propose a change at this time, a temporary special action request would be the proper mechanism to do so in the near term. In the longer term, a regulatory proposal may be submitted to adjust or repeal this closure. The next call for wildlife regulatory proposals is expected in early 2025. OSM maintains a responsibility to carry out these processes once such a request or proposal is submitted.

If you have questions or would like additional information, please contact Ciisquq Crystal Leonetti, Director, Office of Subsistence Management, at crystal_leonetti@ios.doi.gov.

Sincerely,

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Joan M. Mooney
Principal Deputy Assistant Secretary
Exercising the Delegated Authority of Assistant
Secretary - Policy, Management and Budget

cc: The Honorable Lisa Murkowski, United States Senate
The Honorable Dan Sullivan, United States Senate
Tyson Gallagher, Chief-of-Staff, State of Alaska
Jerry Moses, Director – Governor’s Washington, DC Office, State of Alaska
Craig Richards, Contractor, State of Alaska