

Supplemental Sections 5-7

Section 5: Wildlife Delegation of Authority Revision Recommendations

Section 6: Robert's Rules of Order – A Refresher

Section 7: Additional Public Comments on Wildlife Proposals

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Proposed Revisions to Wildlife Delegation of Authority Letters
April 2018

In 2015, administrative revisions were applied to all of the wildlife delegation of authority letters to make them as consistent as possible in terms of verbiage. All of the revised letters went through internal Office of Subsistence Management (OSM) review and were also reviewed by the Interagency Staff Committee. Since that time, and as new letters have been developed in association with more recent wildlife regulatory cycles, some discrepancies and questions of scope have come to light. The following are “Scope of Delegation” revisions/additions OSM requests that the Federal Subsistence Board consider and take action on during the April public meeting:

1. Restrictions/Closures to Nonsubsistence Uses: The following verbiage was included in the Scope of Delegation section in all wildlife delegation of authority letters during the 2015 administrative revision process: “All other proposed changes to codified regulations, such as customary and traditional use determinations, adjustments to methods and means of take, ***or closures and restriction for take by only non-Federally qualified users shall be directed to the Federal Subsistence Board.***”
 - This language specifically prohibits Federal Managers with delegated authority from the Federal Subsistence Board from issuing closures that affect only non-Federally qualified subsistence users. With this language in place, all such actions must be deferred to the Federal Subsistence Board.
 - Currently, Federal fisheries inseason managers with delegated authority from the Federal Subsistence Board may “...close and re-open Federal public waters to nonsubsistence fishing...” but may not “...specify methods and means, permit requirements, or harvest and possession limits for State-managed fisheries.”
 - OSM proposes to remove the bolded language above and add the following: “This delegation also permits you to close and re-open Federal public lands to nonsubsistence hunting, but does not permit you to specify methods and means, permit requirements, or harvest and possession limits for State-managed hunts.” (see attached letter).
 - This revision would facilitate Federal managers’ efforts to implement a stepped approach to the Federal subsistence prioritization process and would increase consistency between wildlife and fisheries delegation of authority from the Federal Subsistence Board.

2. Delegation of authority to the Assistant Regional Director (ARD) of OSM: Currently, the ARD of OSM has delegated authority from the FSB to issue emergency wildlife special actions. The original letter of delegated authority included language stipulating that this ability to issue emergency special actions was contingent upon a staff analysis of the potential action and with unanimous consent of the Interagency Staff Committee. However, this language was omitted in subsequent revisions.
 - OSM proposes adding the following verbiage to the **Scope of Delegation**: “...and only after staff analysis of the potential action and unanimous consent of the Interagency Staff Committee” (see attached letter). This added verbiage makes clear that the ARD for

OSM can issue emergency special actions for wildlife on Federal lands only if these criteria are met.

3. The Scope of Delegation section in the delegation of authority letter to the Arctic Refuge Manager for moose in Units 26B remainder and 26C currently allows the federal manager to “set or adjust quotas, determine the number of permits to be issued, and set season opening and closing dates.”
 - For the past two years, the Federal subsistence hunt has taken place with a harvest quota of two bull moose set by the Federal manager via delegated authority from the Board.
 - OSM proposes adding “set any needed sex restrictions” to the **Scope of Delegation** to clarify the delegated authority from the Federal Subsistence Board. The suggested revision would add this phrase into the Scope of Delegation for the letter (see attached letter).



FISH and WILDLIFE SERVICE
BUREAU of LAND MANAGEMENT
NATIONAL PARK SERVICE
BUREAU of INDIAN AFFAIRS

Federal Subsistence Board

1011 East Tudor Road, MS121
Anchorage, Alaska 99503



FOREST SERVICE

Superintendent
Western Arctic National Parklands
P.O. Box 1029
Kotzebue, Alaska 99752

Dear Superintendent:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the Superintendent of the Western Arctic National Parklands to issue emergency or temporary special actions if necessary to ensure the conservation of a healthy wildlife population, to continue subsistence uses of wildlife, for reasons of public safety, or to assure the continued viability of the population. This delegation only applies to the Federal public lands subject to Alaska National Interest Lands Conservation Act (ANILCA) Title VIII jurisdiction within Unit 23 south of Kotzebue Sound and west of and including the Buckland River drainage for the management of muskox on these lands.

It is the intent of the Board that actions related to management of muskox by Federal officials be coordinated, prior to implementation, with the Alaska Department of Fish and Game (ADF&G), and the Chair of the Northwest Arctic Subsistence Regional Advisory Council (Council) to the extent possible. Federal managers are expected to work with State managers, the Council Chair, and applicable Council members to minimize disruption to subsistence resource users and existing agency programs, consistent with the need for special action.

DELEGATION OF AUTHORITY

1. Delegation: The Superintendent of the Western Arctic National Parklands is hereby delegated authority to issue emergency or temporary special actions affecting muskox on Federal lands as outlined under **Scope of Delegation** below. Any action greater than 60 days in length (temporary special action) requires a public hearing before implementation. Special actions are governed by regulation at 36 CFR 242.19 and 50 CFR 100.19.

2. Authority: This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6), which state: "The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish or wildlife harvest seasons

within frameworks established by the Board.”

3. Scope of Delegation: The regulatory authority hereby delegated is limited to the following authorities within the limits set by regulation at 36 CFR 242.26 and 50 CFR 100.26:

- To set closing dates for the muskox season on Federal public lands in Unit 23 south of Kotzebue Sound and west of and including the Buckland River drainage as it applies to muskox on these lands.
- As needed, set or adjust annual harvest quotas and the number of Federal registration permits to be issued annually for muskox on Federal public lands in Unit 23 south of Koztebue Sound and west of and including the Buckland River drainage.

This delegation also permits you to close and re-open Federal public lands to nonsubsistence hunting, but does not permit you to specify methods and means, permit requirements, or harvest and possession limits for State-managed hunts. This delegation may be exercised only when it is necessary to conserve muskox populations, to continue subsistence uses, for reasons of public safety, or to assure the continued viability of the population.

All other proposed changes to codified regulations, such as customary and traditional use determinations, adjustments to methods and means of take, ~~or closures and restrictions for take for only non-Federally qualified users shall be directed to the Federal Subsistence Board.~~

The Federal public lands subject to this delegated authority are those within Unit 23 south of Kotzebue Sound and west of and including the Buckland River drainage.

4. Effective Period: This delegation of authority is effective from the date of this letter and continues until superseded or rescinded.

5. Guidelines for Delegation: You will become familiar with the management history of the wildlife species relevant to this delegation in the region, with current State and Federal regulations and management plans, and be up-to-date on population and harvest status information. You will review special action requests or situations that may require a special action and all supporting information to determine: (1) consistency with 36 CFR 242.19, (2) if the request/situation falls within the scope of authority, (3) if significant conservation problems or subsistence harvest concerns are indicated, and (4) what the consequences of taking an action or no action may be on potentially affected subsistence users and non-subsistence users. Requests not within your delegated authority will be forwarded to the Federal Subsistence Board for consideration. You will maintain a record of all special action requests and rationale for your decision. A copy of this record will be provided to the Administrative Records Specialist in the Office of Subsistence Management (OSM) no later than sixty days after development of the document.

You will notify OSM and coordinate with local ADF&G managers, the Bureau of Land Management (Central Yukon Field Office) and the Chair of the Northwest Arctic Subsistence Regional Advisory Council regarding special actions under consideration. You will issue decisions in a timely manner. Before the effective date of any decision, reasonable efforts will

be made to notify the public, OSM, affected State and Federal managers, law enforcement personnel, and Council members. If an action is to supersede a State action not yet in effect, the

decision will be communicated to the public, the OSM, affected State and Federal Managers, and the local Council representatives at least 24 hours before the State action would be effective. If a decision to take no action is made, you will notify the proponent of the request immediately. A summary of special action requests and your resultant actions must be provided to the coordinator of the appropriate Subsistence Regional Advisory Council(s) at the end of each calendar year for presentation to the Council(s).

You may defer a special action request, otherwise covered by this delegation of authority, to the Federal Subsistence Board in instances when the proposed management action will have a significant impact on a large number of Federal subsistence users or is particularly controversial. This option should be exercised judiciously and may be initiated only when sufficient time allows for it. Such deferrals should not be considered when immediate management actions are necessary for conservation purposes. The Federal Subsistence Board may determine that a special action request may best be handled by the Board, subsequently rescinding the delegated regulatory authority for the specific action only.

6. Support Services: Administrative support for regulatory actions will be provided by the Office of Subsistence Management, U.S. Fish & Wildlife Service, Department of the Interior.



FISH and WILDLIFE SERVICE
BUREAU of LAND MANAGEMENT
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Federal Subsistence Board

1011 East Tudor Road, MS121
Anchorage, Alaska 99503



FOREST SERVICE

Assistant Regional Director
Office of Subsistence Management
U.S. Fish and Wildlife Service
1011 E. Tudor Road, MS 121
Anchorage, Alaska 99503

Dear Assistant Regional Director:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the Assistant Regional Director of the U.S. Fish and Wildlife Service, Office of Subsistence Management, to issue emergency special actions if necessary to ensure the conservation of a healthy wildlife population, to continue subsistence uses of wildlife, for reasons of public safety, or to assure the continued viability of the population. This delegation only applies to subsistence uses of wildlife on Federal public lands subject to Alaska National Interest Lands Conservation Act (ANILCA) Title VIII jurisdiction.

It is the intent of the Board that actions related to management of wildlife by Federal officials be coordinated, prior to implementation, with the Alaska Department of Fish and Game (ADF&G), and the Chairs of the affected Regional Advisory Councils to the extent possible. Federal managers are expected to work with managers from the State and other Federal agencies, the Council Chairs, and applicable Council members to minimize disruption to subsistence resource users and existing agency programs, consistent with the need for special action.

DELEGATION OF AUTHORITY

1. Delegation: The Assistant Regional Director – Office of Subsistence Management is hereby delegated authority to issue emergency special actions affecting wildlife on Federal lands as

outlined under the **Scope of Delegation** below. Special actions are governed by regulation at 36 CFR 242.19 and 50 CFR 100.19.

2. Authority: This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6), which state: “The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish or wildlife harvest seasons within frameworks established by the Board.”

3. Scope of Delegation: The regulatory authority hereby delegated is limited to the following authorities within the limits set by regulation at 36 CFR 242.26 and 50 CFR 100.26:

To open, close or adjust harvest seasons, and to set harvest and possession limits. This delegation may be exercised only when it is necessary to conserve wildlife populations, to continue subsistence uses, for reasons of public safety, or to assure the continued viability of the population, and only after staff analysis of the potential action and unanimous consent of the Interagency Staff Committee.

All other proposed changes to codified regulations, such as customary and traditional use determinations, Section 804 determinations, or adjustments to methods and means of take, shall be directed to the Federal Subsistence Board.

The Federal public lands subject to this delegated authority are those described in the Subsistence Management Regulations for Public Lands in Alaska at 36 CFR 242.3 and 50 CFR 100.3.

4. Effective Period: This delegation of authority is effective from the date of this letter and continues until superseded or rescinded.

5. Guidelines for Delegation: You will become familiar with the management history of the wildlife species relevant to this delegation, with current State and Federal regulations and management plans, and be up-to-date on population and harvest status information. You will review special action requests or situations that may require a special action and all supporting information to determine: (1) consistency with 36 CFR 242.19, (2) if the request/situation falls within the scope of authority, (3) if significant conservation problems or subsistence harvest concerns are indicated, and (4) what the consequences of taking an action or no action may be on potentially affected subsistence users and non-Federally qualified users. Requests not within your delegated authority will be forwarded to the Federal Subsistence Board for consideration. You will maintain a record of all special action requests and rationale for your decision. A copy

of this record will be provided to the Administrative Records Specialist in the Office of Subsistence Management (OSM) no later than sixty days after development of the document.

You will notify the Federal Subsistence Board and the Interagency Staff Committee, and notify/consult with local ADF&G managers, the U.S. Department of Agriculture, U.S. Forest Service and the appropriate Federal Subsistence Regional Advisory Council(s) regarding special actions under consideration. You will issue decisions in a timely manner. Before the effective date of any decision, reasonable efforts will be made to notify the public, affected State and Federal managers, law enforcement personnel, and Council representatives. If an action is to supersede a State action not yet in effect, the decision will be communicated to the public, OSM, affected State and Federal Managers, and the local Council representatives at least 24 hours before the State action would be effective. If a decision to take no action is made, you will notify the proponent of the request immediately. A summary of special action requests and your resultant actions must be provided to the coordinator of the appropriate Subsistence Regional Advisory Council(s) at the end of each calendar year for presentation to the Council(s).

You may defer a special action request, otherwise covered by this delegation of authority, to the Federal Subsistence Board in instances when the proposed management action will have a significant impact on a large number of Federal subsistence users or is particularly controversial. This option should be exercised judiciously and may be initiated only when sufficient time allows for it. Such deferrals should not be considered when immediate management actions are necessary for conservation purposes. The Federal Subsistence Board may determine that a special action request may best be handled by the Board, subsequently rescinding the delegated regulatory authority for the specific action only.

6. Support Services: Administrative support for regulatory actions will be provided by the Office of Subsistence Management, U.S. Fish and Wildlife Service, and Department of the Interior.



Federal Subsistence Board

1011 East Tudor Road, MS121
Anchorage, Alaska 99503



FISH and WILDLIFE SERVICE
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FOREST SERVICE

Refuge Manager
Arctic National Wildlife Refuge
101 12th Ave, Room 236
Fairbanks, Alaska 99701

Dear Refuge Manager:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the Arctic National Wildlife Refuge Manager to issue emergency or temporary special actions if necessary to ensure the conservation of a healthy wildlife population, to continue subsistence uses of wildlife, for reasons of public safety, or to assure the continued viability of the population. This delegation only applies to the Federal public lands subject to Alaska National Interest Lands Conservation Act (ANILCA) Title VIII jurisdiction within Units 26B remainder and 26C for the management of moose on these lands.

It is the intent of the Board that actions related to management of moose by Federal officials be coordinated, prior to implementation, with the Alaska Department of Fish and Game (ADF&G), the Bureau of Land Management Arctic Field Office, and the Chair of the North Slope Subsistence Regional Advisory Council to the extent possible. Federal managers are expected to work with managers from the State and other Federal agencies, the Council Chair, and applicable Council members, to minimize disruption to subsistence resource users and existing agency programs, consistent with the need for special action.

DELEGATION OF AUTHORITY

1. Delegation: The Arctic National Wildlife Refuge Manager is hereby delegated authority to issue emergency or temporary special actions affecting moose on Federal lands as outlined under the **Scope of Delegation** below. Any action greater than 60 days in length (temporary special

action) requires a public hearing before implementation. Special actions are governed by regulation at 36 CFR 242.19 and 50 CFR 100.19.

2. Authority: This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6), which state: “The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish or wildlife harvest seasons within frameworks established by the Board.”

3. Scope of Delegation: The regulatory authority hereby delegated is limited to the following authorities within the limits set by regulation at 36 CFR 242.26 and 50 CFR 100.26:

To set or adjust annual harvest quotas, [set any needed sex restrictions](#), determine the number of Federal registration permits to be issued, and season opening and closing dates for moose on Federal public lands in Units 26B remainder and 26C.

This delegation may be exercised only when it is necessary to conserve moose populations, to continue subsistence uses, for reasons of public safety, or to assure the continued viability of the population.

All other proposed changes to codified regulations, such as customary and traditional use determinations, adjustments to methods and means of take, or closures and restrictions for take for only non-Federally qualified subsistence users shall be directed to the Federal Subsistence Board.

The Federal public lands subject to this delegated authority are those within Units 26B remainder and 26C.

4. Effective Period: This delegation of authority is effective from the date of this letter and continues until superseded or rescinded.

5. Guidelines for Delegation: You will become familiar with the management history of the wildlife species relevant to this delegation in the region, with current State and Federal regulations and management plans, and be up-to-date on population and harvest status information. You will review special action requests or situations that may require a special action and all supporting information to determine: (1) consistency with 36 CFR 242.19, (2) if the request/situation falls within the scope of authority, (3) if significant conservation problems or subsistence harvest concerns are indicated, and (4) what the consequences of taking an action or no action may be on potentially affected subsistence users and non-Federally qualified users.

Requests not within your delegated authority will be forwarded to the Federal Subsistence Board for consideration. You will maintain a record of all special action requests and rationale for your decision. A copy of this record will be provided to the Administrative Records Specialist in the Office of Subsistence Management (OSM) no later than sixty days after development of the document.

You will notify OSM and coordinate with local ADF&G managers, the National Park Service (Superintendent, Gates of the Arctic National Park and Preserve, the BLM Arctic Field Office, and the Chair of the North Slope Subsistence Regional Advisory Council regarding special actions under consideration. You will issue decisions in a timely manner. Before the effective date of any decision, reasonable efforts will be made to notify the public, OSM, affected State and Federal managers, law enforcement personnel, and Council representatives. If an action is to supersede a State action not yet in effect, the decision will be communicated to the public, OSM, affected State and Federal Managers, and the local Council representatives at least 24 hours before the State action would be effective. If a decision to take no action is made, you will notify the proponent of the request immediately. A summary of special action requests and your resultant actions must be provided to the coordinator of the appropriate Subsistence Regional Advisory Council(s) at the end of each calendar year for presentation to the Council(s).

You may defer a special action request, otherwise covered by this delegation of authority, to the Federal Subsistence Board in instances when the proposed management action will have a significant impact on a large number of Federal subsistence users or is particularly controversial. This option should be exercised judiciously and may be initiated only when sufficient time allows for it. Such deferrals should not be considered when immediate management actions are necessary for conservation purposes. The Federal Subsistence Board may determine that a special action request may best be handled by the Board, subsequently rescinding the delegated regulatory authority for the specific action only.

6. Support Services: Administrative support for regulatory actions will be provided by the Office of Subsistence Management, U.S. Fish & Wildlife Service, and Department of the Interior.

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Making a Motion on Regulatory Proposals/Special Actions

1. Movant makes the motion in the positive: “I move to adopt WP18-99 as proposed/as modified by...”
 - A simple rationale is that when you are voting yes, you are saying you approve, when voting no you are saying you disapprove. To vote no in order to say you approve a proposal (voting against a motion to reject) would get confusing.
 - Under Robert’s Rules, this is a *Main Motion*. It must be resolved before going to any other Main Motion. (Motions to amend are not a Main Motion, but a *Subsidiary Motion*. See more below on amendments)
 - A motion is not in order that conflicts with a resolution previously adopted by the Board at the same session, or that has been introduced and has not been finally disposed of. It is best to amend the motion while it is discussed if you wish to make changes to a proposal. If a motion passes, but you have not fully addressed the subject, the best course of action is a motion for reconsideration (see table below).
 - You may not discuss the merits of your proposal when stating the motion. However, it is not objectionable to say, “If given a second, I will explain why I plan to support/oppose my motion.” That is not a practice endorsed by Robert’s Rules, but it is not discussing the merits.
2. Start with the motion you want to finish with, not a starting point.
 - For example, if you want to adopt the OSM modification, do not start by moving to adopt the proposal as written and then later amending the proposal to adopt the OSM modification. This creates unnecessary procedural complexity. Just start with moving to adopt the OSM modification.
 - However, if your starting point is a motion for something that does not match what the Council recommended, be prepared to provide a basis in the record for that deviation, consistent with ANILCA Section 805(c) (see below).
3. Wait for a second before discussion. No discussion may begin without a second.
 - A chair may ask if there is a second for the motion if none is readily given. If there is none, the chair says, “The motion fails for lack of a second.”
4. Once a second is provided, the chair states the motion again for the record.
5. Discussion
 - Movant gets first crack at discussion
 - Those who have not spoken during discussion should get preference over those who already have.
 - Discussion must be confined to the motion at hand.
 - If your motion is for a modification of the proposal not suggested by OSM or a Council, clearly state on the record the basis for forming your modified proposal. There needs to be a clear administrative record from the beginning to the end.

- Include in your discussion references to specific provisions of ANILCA Section 805(c), especially if you are going to oppose the Council’s recommendation. The criteria in Section 805(c) state that the Board may choose to not follow a Council’s recommendation if
 - it is not supported by substantial evidence,
 - violates recognized principles of fish and wildlife conservation, or
 - would be detrimental to the satisfaction of subsistence needs.

6. Amendments

- Amendments are a Subsidiary Motion that can only be offered once a second has been made on the Main Motion. They can occur during any time in the discussion.
- Motions to amend require a second, and take only a majority vote to pass.
- Amendments can only do the following:
 - i. Amend by inserting
 - ii. Amend by striking out
 - iii. Amend by striking and inserting
 - iv. Amend by substitution
- An amendment must be germane to the subject of the main motion.
- An amendment may not be identical to a question previously decided by the Board during that session.
- Once approved, the main motion as amended still requires a vote. You simply cannot stop with approval of the amendment.

7. Ending discussion/debate

- A request to end debate (known often as “calling the question”) is a motion that first requires recognition by the chair before it can be made, and then it requires a second. The motion is not subject to debate and requires a 2/3 vote to pass. If it passes, a vote on the motion is taken immediately. If not, debate continues.
- The chair may also initiate the end to debate. Chair can ask, “Is there any further discussion?” If no response, vote can proceed. Or, chair can ask, “Are you ready for the question?” Again, if no response, vote can proceed.

8. If there has been a long discussion, it is helpful to again state the motion for the record prior to vote.

9. Vote

10. Chair states the result of the vote. If the motion carries, the chair should state that the Board has adopted that regulatory proposal. If the motion fails, state the regulatory proposal is rejected.

Other Procedures/Motions

To:	You say:	Second needed	Debatable	Amendable	Vote needed
Adjourn	“I move that we adjourn ...”	Yes	No	No	Majority
Recess	“I move that we recess until ...”	Yes	No	Yes	Majority
Suspend further consideration	“I move that we table it”	Yes	No	No	Majority
Postpone consideration of something	“I move we postpone this matter until ...” (defer)	Yes	Yes	Yes	Majority
End debate	“I move the previous question”	Yes	No	No	2/3
Ask for voice vote	“I call for division of the house”	No	No	No	None unless objection
Reconsider something already disposed of	“I move we now reconsider our action on (state what action to reconsider)”	Yes	Yes (if previous action was debatable)	No	Majority
Consider something out of its scheduled order	“I move we suspend the rules and (state what you want to consider that is out of the scheduled order)”	Yes	No	No	2/3
Vote on a ruling by the chair	“I appeal the Chair’s decision”	Yes	Yes	No	Majority

Limitations on a Motion to Reconsider

- It must be made on the same day as the meeting in which the motion to be reconsidered was decided (or on the next day business is conducted, if the session is more than one day).
- It must be made by a person who voted on the *prevailing* side of the motion to be reconsidered.
- Anytime a motion to *Reconsider* is (properly) made, all action authorized by the motion being considered is suspended until the decision whether to reconsider is made. Furthermore, if the motion to *Reconsider* is adopted, the suspension continues until the result of the reconsideration is decided, as long as it’s decided within some specified time limits.

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Mckinney, Kayla <kayla_mckinney@fws.gov>

Fwd: [EXTERNAL] Attn: Regulations Speicalists

3 messages

AK Subsistence, FW7 <subsistence@fws.gov> Tue, Mar 27, 2018 at 1:20 PM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

----- Forwarded message -----
From: **Darlene M Breitreutz** <darleneb@kpunet.net>
Date: Tue, Mar 27, 2018 at 12:55 PM
Subject: [EXTERNAL] Attn: Regulations Speicalists
To: subsistence@fws.gov

March 27, 2018

Office of Subsistence Management

Attn: Regulations Specialist
[1011 East Tudor Road](#), Mail Stop 121
Anchorage, Alaska 99503-6199

Dear Subsistence Management,

I understand there is a vote on the table to limit non-residents, in Area 2A Prince of Wales Island, to only two deer per year. I must say that is really a jab in the eye for Ketchikan people who also enjoy venison on their table. We live part-time on POW and part-time in Ketchikan, and we have been hunting there for years. We only take what we need, which is 2-3 deer total per year, (although sometimes we get none). The problem is not the people who come to POW and abide by the law and hunt legally, it goes deeper than that. But I do believe they are being discriminated against. There are a few issues I can see: 1) There is a huge wolf population on POW and the past two years I've noticed it getting worse. Our friends were circled by wolves in a few different areas this past season, and we've seen the signs and heard the howls. In all the years I've hunted, I've never encountered that before, other than a wolf pile here and there. It's now everywhere! This is based on our observation only. 2) It's possible, the unreported harvest of the blacktail deer is higher than

what they believe it to be. and ; 3) We have seen more bears the past couple years than any other year also. Again, this is our observation only.

There are "some" residents on the island that believe the deer are "THEIRS" and if I'm not mistaken, POW is part of Alaska and the Tongass National Forest which means they belong to all residents of Alaska. It's like saying they cannot come over to Revilagagado Island to hunt "our" goats, etc.

I believe this is starting to be more discriminatory than anything, it's not science-based but more politically-based. It's divisive and pits user groups against each other. Already there is a preference shown by the longer hunting season, and the taking of does for POW residents. Where does it stop? Maybe also take a look at what the limitations can do to the economy. It could hurt grocery stores, gas stations, lodges, cabin rentals, IFA, airlines, restaurants vehicle rentals, etc.

This change does not effect our family but I feel a need to at least write to the board to help them look at it in a different perspective and actually think about the effects it can have as a whole before voting on the outcome. Don't keep it political, use science as your basis.

Thank you for your time,

Darlene Breitzkreutz



Mckinney, Kayla <kayla_mckinney@fws.gov>

Fwd: [EXTERNAL] WP-01

4 messages

AK Subsistence, FW7 <subsistence@fws.gov>

Tue, Mar 27, 2018 at 9:30 AM

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

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

From: **Foster, Chris** <CFoster3@peacehealth.org>

Date: Tue, Mar 27, 2018 at 9:20 AM

Subject: [EXTERNAL] WP-01

To: "subsistence@fws.gov" <subsistence@fws.gov>

I currently reside in Unit 1 in the city of Ketchikan. I've formally lived and hunted in unit 4 on Baranof island, where I also benefited from federal subsistence privileges while deer hunting. Throughout my adult life I've travelled and hunting around various hunting units to include unit 3 and Kodiak island unit. The proposal to limit non unit 2 residents to two deer is detrimental. With the way the regulations are written I would be limited in harvest opportunity, if I'm successful in my unit (unit 1) prior to visiting and hunting in unit 2 should the two deer limit be adopted. My annual harvest quota is 4 under current sport hunting regulations as a resident of a non subsistence community. I travel to hunt within SE AK. I have a boat and look forward to diversifying my harvest opportunities annually. It's very feasible for me to hunt unit 1,2, and 3 in a single year. The proposed two deer limit in unit 2 effectively reduces my hunting opportunity. I have never taken four deer out of unit 2 on a single year. It's advantageous to have the harvest opportunity after the November deer hunting closure in unit 1.

Biologically speaking, I climb remote peaks off the road system in unit 2. Most recently I've summited Bokan and Eudora mountain. On both occasions I've appreciated good deer numbers and harvested selectively .

I oppose a two deer limit on POW island.

Regards,

Chris Foster

Ketchikan, AK



Mckinney, Kayla <kayla_mckinney@fws.gov>

Fwd: Wildlife Proposal

2 messages

AK Subsistence, FW7 <subsistence@fws.gov> Mon, Oct 16, 2017 at 7:39 AM
To: Paul Mckee <paul_mckee@fws.gov>, Theo Matuskowitz <theo_matuskowitz@fws.gov>, Jennifer Hardin <jennifer_hardin@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

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

From: **Jeff Sperry** <jsperry17151@gmail.com>
Date: Sun, Oct 15, 2017 at 7:52 PM
Subject: Wildlife Proposal
To: subsistence@fws.gov

I would like to comment on the following wildlife proposals: famil

WP18-01 - I am opposed. Other folks need to provide for their families also. The deer population is sufficient enough to allow a harvest quantity of 2 deer per individual

WP18-02 - I am opposed. The current system is sufficient and a change is not needed.

WP18-09 - I propose amending this proposal to eliminate hunting for another individual (commonly referred to as proxy hunting) As has been mentioned - the system is abused. There is plenty of opportunity to share the game you harvest under your own harvest tag with other individuals. I have observed many abuses of the proxy hunting (and fishing) system.

WP18-10 I am opposed. there are family members that live outside of this unit that return to this unit to hunt with their family. These people would be excluded from the traditional and customary hunt if this proposal were passed. Since this is a one bull area with no antler restrictions the local residents should have no problem harvesting an animal in the allotted time.

WP18-16 I am opposed. extending the season will greatly increase the chance that the bull moose population will be decimated. This will result in a huge decrease in the overall moose population, which will in turn decrease the future opportunities to harvest a bull moose for any qualified user.

WP18-17 I am opposed. extending this season will greatly increase the chance that the bull moose population will be decimated. Once it is decimated it will take years to recover. This will greatly decrease the future opportunities for any qualified user to harvest a bull moose. Additionally, Ahtna has 3.7 million acres of their own land to hunt on, with no competition from any other individuals. They have an additional 1 million acres of federal land to hunt. They should have no problem harvesting a bull moose.

WP18-18 I am opposed. Extending the season will greatly increase the chance that the bull moose population will be decimated. Once that occurs it will take years to recover. This will greatly decrease the future opportunity for any qualified user to harvest a bull moose. Additionally, Ahtna has 3.7 million acres of their own land to hunt with no competition from any other individuals. they also have 1 million acres of federal land to hunt. They should have no problem harvesting a bull

moose under the current system.

WP18-19 I am opposed. There is no need to add the Ahtna advisory committee to the designated group that is determining what sex of animals can be harvested. That is a biologically based decision and can best be made by the Department of Fish and Game biologists.

WP18-54 I am opposed. It is extremely difficult to determine which caribou are mentasta and which are nelchina. Increasing the harvest quota significantly increases the chances that the mentasta herd will be overharvested.

wp18-56 I support this proposal. This hunt opportunity should be open to the general public as the local residents do not utilize this hunt.

w518-57 I am opposed to this proposal. the population is currently sufficient to support non federally qualified hunters the opportunity to hunt. With a bag limit of 5 caribou per day there is ample opportunity for federally qualified subsistence users to harvest caribou.

Thank you for the opportunity to comment on these proposals.

Jeff Sperry

Resident of Alaska



Post Office Box 32712 • Juneau, Alaska 99803

Telephone: (907) 789-2399 • Fax: (907) 586-6020

April 2, 2018

Federal Subsistence Board
Office of Subsistence Management
1011 E. Tudor Road, MS-121
Anchorage, AK 99503-6199

Dear Members of the Federal Subsistence Board:

The Territorial Sportsmen, Inc. (TSI), of Juneau, Alaska opposes WP18-01, a proposal to reduce the bag limit and shorten the season for non federally qualified hunters in Game Management Unit 2.

Data presented by the Alaska Department of Fish & Game indicate that deer populations in Unit 2 are high, and that the number of deer taken by federally qualified hunters has actually increased over the past decade. Federally qualified hunters already have substantially more opportunity than other hunters to harvest deer under current regulations, having a higher and less restrictive bag limit (i.e., allowing taking of does) and a longer season than the state season, including a time of year (January) when the animals are at low elevations and more vulnerable to beach hunts.

There is no indication that hunting by non-federally qualified hunters has precipitated any biological concern or that restrictions are necessary in order to provide adequate opportunity for subsistence; therefore the additional restrictions contained in this proposal are not warranted.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew H. Robus".

Matthew H. Robus, President
Territorial Sportsmen, Inc.



AK Subsistence, FW7 <subsistence@fws.gov>

[EXTERNAL] Proposal WP-01

3 messages

Kris Williams <kriswilliams@kldistributor.com>
o: "subsistence@fws.gov" <subsistence@fws.gov>

Tue, Apr 3, 2018 at 7:49 PM

To whom it may concern,

I recently read a proposal that seeks to limit non-unit 2 residents to only 2 bucks in unit 2. I am a lifelong Ketchikan resident, and my wife is from Coffman Cove. We have family on the POW and have spent many years traveling over to hunt and visit family. I am appalled that the people in the communities there would support such a proposal. I have not seen any evidence that the deer population is declining on the island. I do believe it is true that the deer were not down on the roads making it easy for the 'local' residents to shoot them from their vehicles this past season. However, I do know many people that took the time to hunt the land, and had very successful seasons. I believe the doe harvest that is taking place I know there is a massive influx of hunters that travel to POW during the rut in November/December, and that has been taking place for as long as I can remember. I think there are probably many factors that may have impacted this past deer season, and the proposal is nothing more than a knee jerk reaction. If the deer population is in such dire straits, and a bag limit reduction is being proposed then the new reduced limit should apply to all Alaskan Residents and should not turn POW island into a private game reserve for the island residents. I honestly don't see how one can limit non-POW residents to 2 deer on the entire island. Often, I will take my boat from Ketchikan over to the east coast of prince of wales and hunt. There are no roads that connect these areas to any cities on POW. These areas are only accessible by boat and are mainly hunted by residents of Ketchikan. Many of the areas that I hunt by boat are on the southeast side of prince of wales. These areas aren't geographically feasible for the residents of POW. Most the population is located on the opposite coast, or 40 miles or more north. Why limit Ketchikan residents in some of these remote areas that are more accessible for us then they are for the residents of POW.

I do hope that you strongly consider this proposal and the effects it will have on all residents of Alaska. If there is a deer population problem on the island then maybe everything should be looked into. From doe seasons, wanton waste, and after hours hunting. And if there is going to be a reduction in bag limit in a unit it should apply to all residents statewide. We are all residents here, and we all share in these resources.

Kris Williams

Sales Representative



Phone: **907-617-0938**

Fax: **907-225-0938**

Email: kriswilliams@kldistributor.com

Address: [11039 Victorson Ct](#)

[Ketchikan, AK 99901](#)



Wed, Apr 4, 2018 at 7:49 AM

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

From: **marvin mccloud III** <ktnak907@yahoo.com>
Date: Tue, Apr 3, 2018 at 7:48 PM
Subject: [EXTERNAL] Please turn down proposal Wp18-01
To: subsistence@fws.gov

I strongly urge you'll turn down proposal wp18-01

I have live and worked in Ketchikan since 1989, but spend a great deal of my time hunting and fishing prince of whales island (unit2). Most of my access is with use of my 25ft boat which takes me about 25min to get to some of my hunting spots on the island. This is very much our backyard. Our dependence on this land and these deer is no less important than those living just a few miles across Clarence straights. This proposal seems to be assigning blame for one tough season of hunting as nothing about Ketchikan hunters competing with pow residents has changed in my many years here.

Like years past I spent a great deal of time hunting all over POW from August thru late November of 2017 and my observation are this. The deer population on the roads and lands accessed by boat have a great number of deer and the rut takes place same time as it always has. I successfully harvested 4 for my family this 2017 season. In November I took my truck and I spent 5 days on the northern road systems up by whale pass. while I seen lots of deer those 5 days I didn't harvest one near the road. All the deer near the roads were very spooky, even the doe's. In years passed when I had done this they were not scared of people in the least. It's my belief that the harvesting of these easy to shoot near the road system does by unit 2 residents is making it so bucks no longer have a reason to come close to the road system during the rut. It also makes the few remaining doe's harder to shoot bucks off of suing that time. In the main areas I hunt, doe's are not as weary of people just as it once was along the main road system before shooting doe's was allowed. The many people who did have great success this passed season got out of their trucks.

Nothing about this proposal is about helping the deer population or the people who depend on them, it's all about greed and entitlement. The residents of unit 2 already get special privileges such as extra tags for taking doe's and extended seasons. I urge you don't take away a valuable resource from so many that depend on it just because a few feel entitled to it.

Thank you for your time

Marvin McCloud III
[14100 north Tongass](#)
Ketchikan AK, 99901

4/4/2018

DEPARTMENT OF THE INTERIOR Mail - Fwd: [EXTERNAL] Prince of Wales deer

Fwd: [EXTERNAL] Prince of Wales deer

1 message

Wed, Apr 4, 2018 at 7:49 AM

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

From: **Everett Athorp** <eathorp@gmail.com>

Date: Tue, Apr 3, 2018 at 6:17 PM

Subject: [EXTERNAL] Prince of Wales deer

To: subsistence@fws.gov

I am all for decreasing the bag limit for non rural hunters on pow. We need the deer for subsistence here on the island meat is to expensive here. I see the ferry full of hunters all winter long leaving with truck loads of deer some come over in the evening ferry hunt all night and catch the ferry the next morning never see the light of day. I would even like to see it stoped to one.

Thank you

Everett athorp

Klawock so

907 401 1688

4/5/2018

DEPARTMENT OF THE INTERIOR Mail - Fwd: [EXTERNAL] Unit 2 deer harvest



Fwd: [EXTERNAL] Unit 2 deer harvest

1 message

Thu, Apr 5, 2018 at 7:31 AM

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

From: **Tor Jorgensen** <torjorgensen@hotmail.com>

Date: Thu, Apr 5, 2018 at 6:20 AM

Subject: [EXTERNAL] Unit 2 deer harvest

To: "subsistence@fws.gov" <subsistence@fws.gov>

To whom it may concern,

I have lived in Ketchikan for over 30 years, and have hunted in unit 2 most of my life. Please do not reduce the harvest limit from 4 to 2 for non subsistence hunters. There are plenty of deer around for all of us, many more than 10 years ago. You just have to get off of the road to find most of them. Thanks.

Tor Jorgensen
Ketchikan AK.

Sent from my iPhone



Fwd: [EXTERNAL] Turn down proposal WP18-011 message

Thu, Apr 5, 2018 at 1:07 PM

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

From: **jeff reese** <fatty259@gmail.com>

Date: Thu, Apr 5, 2018 at 12:52 PM

Subject: [EXTERNAL] Turn down proposal WP18-01

To: subsistence@fws.gov

Hello my name is Jeff Reese and I have hunted Prince of Wales for 16 years now. My dad taught me hunting there when I was a teen and I have taken my little girl hunting there and I plan on taken my other kids hunting there. Teaching my kids hunting ethics and safety and to get in the woods not just drive a road looking for deer but to get out in the woods and hunt. Prince of Wales has been that place I have been doing that for a long time. I would like to continue taking my children and teach them the way I was taught to deer hunt on Prince of wales. The deer we get from the island feeds my family in the winter. I also don't think it is fair that the residents of Prince of Wales get to hunt sooner and later the then the residents of Ketchikan on Prince of Wales. There is not a 100% guarantee that we will shoot our 4 buck limit that is why it called HUNTING NOT KILLING DEER. Prince of Wales Island maybe A different island but it's so close I consider it my backyard. I feel it's the doe hunting that's keeping the easy to shoot deer off the roads. That doe's on the roads are very spooky now. That the population is fine and people who put in effort are very successful. The people that put in the time to find the deer find them. Its not the people not from Prince of Wales Island that's the problem we don't shoot too many deer. How much hard earned money do we non-subsistence hunters spend to hunt Prince of Wales Island each year? I know I have spent thousands of thousands of dollars to hunt there a lot of that money being spent on cabins and gas and food to support locally owned businesses of Prince of Wales Island. This saddens me that some people that don't want to work to shoot there deer are trying to put restrictions on us non-subsistence hunters.

4/5/2018

To the Federal Subsistence Board,

Proposal 18-01

This is a contentious issue for all who utilize and or rely on a valued resource. I would hope that everyone who seeks to pursue this resource for whatever reason would do so honestly and with an open mind to the importance it holds for all users. The current science and the survey data indicate that harvest is occurring with a preference towards subsistence users resulting in harvest consist with historical numbers and levels of effort. Herd evaluation also has the deer population as stable or growing despite harvest above the harvest objective of 2,700 deer. The data also indicates that the average number of deer harvested by non-federally qualified hunters in Unit 2 is at or below 2, which is the guideline this proposal intends to enact. In this particular case reality is meeting the intended outcome of this proposal and has been for some time so I see no need to amend the current regulations.

It seems as though we are at a cross roads of two perspectives, one based on science (though not perfect) and the other public opinion/personal experience. Coming from a background in science and knowing how opinions can be distorted and experiences varied (from person to person and year to year) I would tend to agree with the science.

I would like to build upon what science and data we do have and collect. I would like to investigate more thoroughly how and where hunters hunt, why they hunt, how much time, distance and effort they dedicate over the entirety of the open season as well as determining if at all possible how many deer are needed for any given hunter or a hunters dependents. If we can better understand how the deer are utilized we might able to respond in more specific ways when needed in the future to realize positive and intended impact without making drastic changes with uncertain outcomes as this proposal looks to make.

In conclusion, we all need to hold ourselves and our hunting community accountable and recognize the role we play in the continued existence of the deer as a resource. We need to understand the science, help to aid in the collection of data, be truthful and honorable in our endeavors, respect the resource and practice good husbandry. Deer if valued as a resource by all will better insure adequate funding, research and protection. If utilizers lose opportunity they may value the resource less, which could directly affect the deer in a negative way and the communities that depend on them both for subsistence and for economy.

Thank you for your time and the opportunity to share my comments.

Sincerely,
Matt W. Allen



Fwd: [EXTERNAL] Objection to wp18-011 message

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

From: **Sam Dalin** <samdalin@yahoo.com>
Date: Thu, Apr 5, 2018 at 1:23 PM
Subject: [EXTERNAL] Objection to wp18-01
To: "subsistence@fws.gov" <subsistence@fws.gov>

I strongly urge you'll turn down proposal wp18-01
I have live and worked in Ketchikan 30 years, but spend a great deal of my time hunting and fishing Prince of Wales Island (unit2). Most of my access is by boat which takes me about 30 min to get to some of my hunting spots on the island. This is very much our backyard. Our dependence on this land and these deer is no less important than those living on POW. This proposal seems to be assigning blame for one tough season of hunting as theres been no change in Ketchikan hunters competing with POW residents over the years.

Like years past I spent a great deal of time hunting all over POW from August to Dec of 2017 and my observation are this. The deer population on the roads and lands accessed by boat have a great number of deer and the rut takes place same time as it always has. My family (wife and kids) have taken the deer it needs and enough to share with less fortunate familys this 2017 season (below the 4 deer limit but still should have equal opportunity as everyone to take 4 if we need them). All the deer near the roads were very spooky, even the does It's my belief that the harvesting of these easy to shoot does near the road system by unit 2 residents is making it so bucks no longer have a reason to come close to the road system during the rut. It also makes the few remaining doe's harder to shoot bucks off of duing that time. In the main areas I hunt, doe's are not as weary of people just as it once was along the main road system before shooting doe's was allowed. The many people who did have great success this passed season got out of their trucks. If anything should be done stopping the taking of does should be a first!

Nothing about this proposal is about helping the deer population as both the state and federal biologists opposes this proposal and say there is a strong as population as theres ever been. It's all about greed and entitlement. The residents of unit 2 already get special privileges such as extra tags for taking doe's and extended seasons. I urge you don't take away a valuable resource from ALL ALASKANS that depend on it just because a few feel entitled to it.

Thanks Sam Dalin
[7937 WILLIAMS RD](#)
[KETCHIKAN SO 99901](#)



Fwd: [EXTERNAL] Objection to Proposal WP18-01

1 message

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

From: **Heather Dalin** <mrsdalin@yahoo.com>
Date: Thu, Apr 5, 2018 at 5:34 PM
Subject: [EXTERNAL] Objection to Proposal WP18-01
To: "subsistence@fws.gov" <subsistence@fws.gov>

To whom it may concern:

I strongly urge you to turn down proposal wp18-01! I have lived and worked in Ketchikan for 24 years, but spend a great deal of my time hunting and fishing Prince of Wales Island (unit2). Most of my access is by boat which takes me about 30 min to get to some of my hunting spots on the island. This is very much our backyard. Our dependence on this land and these deer is no less important than those living on POW. This proposal seems to be assigning blame for one tough season of hunting as there's been no change in Ketchikan hunters competing with POW residents over the years.

Like years past I've spent a great deal of time hunting all over POW and from August to Dec of 2017 my observations are these:

The deer population on the roads and lands accessed by boat have a great number of deer and the rut takes place same time as it always has. My family (husband and kids) have taken the deer we need and enough to share with less fortunate families in the 2017 season (below the 4 deer limit but still should have equal opportunity as everyone to take 4 if we need them). All the deer near the roads were very spooky, even the does. It's my belief that the harvesting of these easy to shoot does near the road system by unit 2 residents is making it so bucks no longer have a reason to come close to the road system during the rut. It also makes the few remaining doe's harder to shoot bucks off of during that time. In the main areas I hunt, doe's are not as weary of people just as it once was along the main road system before shooting doe's was allowed. The many people who did have great success this passed season got out of their trucks. If anything should be done stopping the taking of does should be a first!

Nothing about this proposal is about helping the deer population as both the state and federal biologists oppose this proposal and say there is a strong as population as there's ever been. This proposal is all about greed and entitlement. The residents of unit 2 already get special privileges such as extra tags for taking doe's and extended seasons. I urge you DO NOT take away a valuable resource from ALL ALASKANS that depend on it just because a few feel entitled to it.

Sincerely,
Heather Dalin
[7937 WILLIAMS RD](#)
[KETCHIKAN, AK 99901](#)



Fwd: [EXTERNAL] Unit 2 deer proposal to reduce limit from 4 to 2

1 message

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

From: **Drew Mathews** <drew0030@gmail.com>
Date: Thu, Apr 5, 2018 at 4:05 PM
Subject: [EXTERNAL] Unit 2 deer proposal to reduce limit from 4 to 2
To: subsistence@fws.gov

I am not a fan of harvest limit restrictions of this magnitude especially when not based upon biological research. Subsistence users can harvest an unlimited number of deer in unit 2. All they need to do is use their personal tags and proxy hunt for others.

Hunters average about two days per deer harvested if memory serves me correctly. This really is a tremendously good success rate.

I am sure there are areas in which the population has decreased due to many factors from logging, hunting pressure, wolves, bears etc.

Overall there seems to be a fair number of deer available to hunt.

August 1, 2017 there were two of us hunting unit 2. We harvested 3 deer and could have both limited out if we so chose. We both hunted two days together and each got 2 deer. This was plenty for or freezers until we need to go back out in November and get a couple more for winter and next summer.

Unit two residents have a very liberal season and I can't understand why they would need to reduce the limits. They live there and can hunt any time they want. Even if they can only hunt 4 days a month and average 1 deer per two days that is still 5-7 deer which is more than most people eat in a year. Takes a family of 5 to eat that many deer a year with all the other fish, wildlife and waterfowl available. Family of 5 probably has more than one hunter as well.

Please think twice about limiting non rural this way without valid research.

Drew Mathews
Former unit 2 resident residing in unit 1.

Hunt hard eat well.

Sent from my iPhone



Fwd: [EXTERNAL] Public comment on WP18-01

1 message

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

From: **Rick Collins** <eaccharters@icloud.com>

Date: Thu, Apr 5, 2018 at 5:54 PM

Subject: [EXTERNAL] Public comment on WP18-01

To: subsistence@fws.gov

I am writing to comment on WP18-01. I am very much against this proposal because it discriminates against against people like myself and covers too large of an area.

This proposal gives a person who could have recently moved to Craig from the lower 48 more rights to deer on the Southeastern shore of POW Island than I have as a lifelong Ketchikan resident. Ketchikan residents are actually physically closer to this area than many people who live on POW Island.

Thank you

Rick Collins

Explore Alaska Charters, LLC

Website: www.explorealaskacharters.com

Email: fish@explorealaskacharters.com

Cell: 907 617-5902

Sent from my iPhone

4/5/2018

DEPARTMENT OF THE INTERIOR Mail - Fwd: [EXTERNAL] 18-01/ 18-02



Fwd: [EXTERNAL] 18-01/ 18-02

1 message

Thu, Apr 5, 2018 at 1:26 PM

To whom it may concern,

This letter is in opposition to wp18-01 the people of Southeast all have the right to deer in the general season no matter where we live, I have seen more residents of prince of whales island (unit 2) commit more violations involving deer than the non substance people from unit 1. And have heard them saying that we have to kill them all so the people from Ketchikan can't.

The amount of money that hunters bring to unit 2 through food, lodging, and gas is substantial.

As for Wp-18-02 if the residents of unit 2 have to live a "substance lifestyle" they can not afford to travel throughout the state to hunt Roy alone afford the freight to ship the harvested game

If you have any questions for me,

I am available for further comments

Thank you

Kyle Worman

Sent from my iPhone



Mckinney, Kayla <kayla_mckinney@fws.gov>

Fwd: comments on proposal WP 18-51, 18-03,18-04, 18-05, 18-24

AK Subsistence, FW7 <subsistence@fws.gov> Fri, Aug 4, 2017 at 1:55 PM
To: Theo Matuskowitz <theo_matuskowitz@fws.gov>, Paul Mckee <paul_mckee@fws.gov>, Jennifer Hardin <jennifer_hardin@fws.gov>, Kayla Mckinney <kayla_mckinney@fws.gov>

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

From: **Sharon Alden** <fwxsca@yahoo.com>
Date: Fri, Aug 4, 2017 at 1:52 PM
Subject: comments on proposal WP 18-51, 18-03,18-04, 18-05, 18-24
To: "subsistence@fws.gov" <subsistence@fws.gov>

To: Office of Subsistence Management
Attention: Theo Matuskowitz
From: Sean McGuire
Re: comments on proposal WP 18-51, 18-03, 18-4, 18-5, 18-24

I am opposing proposal WP 18-51 There should be no human food or any human substance to bait any animals. This is so basic. The last thing we want is to habituate bears or any wild animal to human food. This is an ethical as well as a safety issue. The last thing we want to see is the federal baiting regulations aligned with the state of Alaska's. The State baiting regulations are painfully out dated and present a glaring safety issue.

I am opposing proposal WP 18-03 the extended hunting and trapping season in game unit one. Over kill.

I am really opposed to proposal WP 18-04. Why in the world would you want to put more pressure on a wolf population that's already in trouble this appears to be contrary to the basic concept of wildlife management?

I am also opposing proposal WP 18-05 relates to my opposition to WP18-04.

I am also opposing in the strongest possible terms proposal WP 18-24 To heard wildlife with snow machines is one of the most unethical things I can imagine and the backlash would be harsh.

Thank you for your attention
Sean McGuire
159 Kniffen Rd
Fairbanks, Ak.
ph 907-888-0124
email fwxsca@yahoo.com

4/5/2018

DEPARTMENT OF THE INTERIOR Mail - Fwd: [EXTERNAL] Proposal WP18-56



Fwd: [EXTERNAL] Proposal WP18-56

1 message

Thu, Apr 5, 2018 at 11:51 AM

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

From: **Doug Vincent-Lang** <dvincentlang@yahoo.com>
Date: Thu, Apr 5, 2018 at 11:47 AM
Subject: [EXTERNAL] Proposal WP18-56
To: subsistence@fws.gov

Please submit this comment regarding Proposal WP18-56 for incorporation into the public record. Thank you.

I support passage of WP18-56 submitted by Dick Bishop to open the Arctic Sheep Management Area to regulated harvest by non-local hunters. Based on the posted materials for the April 2018 Federal Subsistence Board meeting it is clear that there is ***no biological reason for closing the area to Dall sheep harvest by non-locals.*** The population is of sufficient size to provide for both subsistence needs of local users AND a regulated harvest by non-local users. Please incorporate Mr. Bishop's comments regarding his proposal into these comments.

Doug Vincent-Lang
dvincentlang@yahoo.com

ALASKANS FOR WILDLIFE
PO BOX 81957
FAIRBANKS, ALASKA 99708
November 7, 2017

Theo Matuskowitz and
Federal Subsistence Board
Office of Subsistence Management
Anchorage, Alaska

RE; Comments on Proposals
WP18-04

Dear Mr. Matuskowitz and Members of the Board,

Alaskans FOR Wildlife (AFW) strongly opposes this proposal which would increase GMU 2 “harvest” of wolves to 30% of the unit wide preseason population estimate from its current limit of 20%.

The past season management of this GMU 2 hunting and trapping season appears to have been out of control by an over-harvest factor of 2.5. This situation represents mismanagement and as noted elsewhere does erode whatever public confidence has existed, if any, in the ability to manage hunting and trapping of wolves in GMU2.

We also observe a deliberate attempt by trappers to cause such over harvest, noting threat of purposeful increased take if the quota is not raised (statement documented in March RAC meeting transcript... a threat for self action and such by other GMU2 trappers and also by not reporting take until 14 day quota is up). Beyond reported take, unreported take added likely substantial taking which must have resulted in an

unmanageable substantial overkill vs. the established 20% quota.

Noting a clearly stated conservation concern for the target wolves of GMU 2 by such as the US Fish & Wildlife Service 2015 Status Review for the target wolf population, we find the RAC's statement that there is no conservation concern involved for this population to be completely wrong. There is substantial conservation concern for this population. A conservation concern should be partially served by denying this proposal. Unreported take also appears very high but is not given appropriate consideration by the RAC in proposing increased harvest. Even ADFG advises there be no increased harvest level this regulatory year.

In particular we note the stated intention of some local trappers to pay no heed to quota limits. Also, there is a substantial national interest in these public lands and the wildlife thereon.

No reflection of the reality of such national interest whatsoever from all participants is evident in the March RAC meeting transcript, and barely any shown in subsequent RAC actions (with exception of the no votes in RAC recent action).

GMU 2 hunters and trappers may feel they have no concern for the views of others among the public. We note however that many Alaskan citizens labored with skill and determination to craft ANILCA legislation and worked to see Congressional action that accommodates subsistence. In those 1970s ANILCA deliberations, a public lobbying for ANILCA did care for the rural Alaskan subsistence needs and realities of Alaska. They, this citizen coalition known as The Alaska Coalition, in conjunction with the Alaska Federation of Natives, developed what is known in ANILCA as Title VIII, the Subsistence Title.

Title VIII is the very mechanism that 1) established a rural subsistence priority, and 2) that established the statewide system of subsistence advisory councils such as for GMU 2, and for the Alaska Federal Subsistence Board, all of which were legislated in a determined good faith effort by Alaskans and other interests nationally to protect and give high profile to sustain a legitimate subsistence culture and practice.

We ask that the SE RAC and its members and the agency personnel involved consider this national interest and act in good faith. It is no mystery that the fate, the management of wolves in the Tongass, and good faith effort and care - the proper stewardship of Tongass wildlife - is and will be of great interest and will be visible across Alaska and nationally.

Interest resulting from press releases of recent RAC's actions has already created national attention and relevant inquiry is already evident. We urge all concerned here that to protect and honor subsistence does require good faith and respect for the wildlife and for the general public who are legitimate stakeholders in the management of the Tongass and its wildlife.

Should a failure to deny WP 18-04 result, we suggest such will produce a widely generated negative public attitude. WP 18-04 in reality is an anti subsistence measure. It is this in the need to demonstrate proper stewardship and that we urge rejection of WP 18-04. We also strongly urge an effort to recognize and appreciate the wider public ownership reflected in the good faith demonstrated to sustain subsistence as we labored for the right legislative provisions in ANILCA's Title VIII in the 1970s.

Thank you for consideration of these comments,

Sincerely,

Jim Kowalsky, Chair

ALASKANS FOR WILDLIFE
POBOX 81957
FAIRBANKS, ALASKA 99708
November 7, 2017

Theo Matuskowitz
Federal Subsistence Board
Office of Federal Subsistence Management
Anchorage, Alaska

Re: Proposal Comments WP 18-51

We urge that this proposed to reduce bear baiting to match the lowest possible requirements that exist on state lands be denied. We urge denial on the basis of clear need to protect human safety, among other reasons.

Bears habituate to human foods such as those proposed to be used in WP 18-51. Bear encounters with humans are much in the news. Several such incidents in Alaska have resulted in tragic loss of human life.

Each spring the ADFG warns residents to not allow or attract bears with access to human foods and garbage. It is incomprehensible that a proposal such as this one can in all seriousness be made. In the interests of reducing human/bear conflict to campers, hikers, and village residents in their communities that is encouraged by the increasing the motivation by bears to engage with humans by becoming fond of human foods, we urge denial of WP 18-51

Existing state bear baiting rules in our view have the effect of promoting more dangerous human/bear encounters. These existing state bear baiting rules should actually be revised in reverse to match or exceed existing federal rules, not the opposite arrangement proposed in WP 18-51.

The originators of this proposal, the Eastern RAC, would be best advised in the interests of promoting increased public safety to seek or formally propose such reversal upgrade to the Alaska Board of Game and not endeavor to downgrade as proposed in WP 18-51.

Further, as bear baiting extends to national park lands within the Wrangell/St Elias National Park and Preserve (WSE) we note that the existing rule to allow brown and black bear baiting in park preserves including WSE park lands conflicts with the National Park Service's own rule; 36 CFR 2.2(a) (2) which prohibits "the feeding, touching, teasing, frightening or intentional disturbing wildlife nesting, breeding or other activities" in national parks..

We note the park service in allowing this activity on its lands chooses to violate its own rule and has laid itself open to challenge.

In any case we urge the federal subsistence entities to steer clear of this conflict.

In summary there is no justification for allowing the use of human foods and scent lures to bait bears.

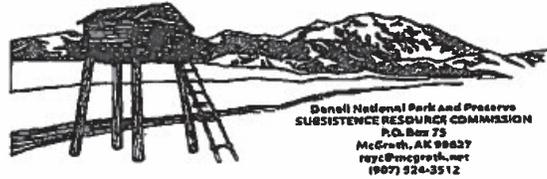
A careful consideration of this proposal should it pass will suggest that acceptance will generate a very highly negative public reaction.

Considering a likely highly negative public response, WP 18-51 is actually an anti subsistence measure. Passage will backfire by promoting potential damage to the culture and practice.

We urge rejection of WP-18-51

We thank the Federal Subsistence Board and its Regional Advisory Councils for consideration of these comments.

Sincerely,
Jim Kowalsky
For Alaskans FOR Wildlife



November 1, 2017

Anthony Christianson, Chair
Federal Subsistence Board
U. S. Fish and Wildlife Service
Office of Subsistence Management
1011 E. Tudor Road, MS-121
Anchorage, AK 99503

Dear Chairman Christianson:

The Denali National Park Subsistence Resource Commission (SRC) met via teleconference on October 25, 2017. The SRC reviewed the federal subsistence wildlife proposals for the Denali area (GMU 13) being considered for the 2018-2012 regulatory cycle and would like to provide comments on the following proposals:

WP 18-14: Extend wolverine season by 28 days in GMU 11 and 13 to align Federal and State regulations

The Denali National Park Subsistence Resource Commission supports WP18-14 as written. Based on personal experiences trapping in Unit 13, extending the wolverine season by 28 days will allow for incidental catches of wolverine, which are often caught in lynx traps. Wolverine numbers should be monitored because they can be sensitive if too many are harvested, as wolverine only have 1-2 pups a year.

WP 18-18: Extend moose season by 191 days for bull antlered moose in GMU 13.

The Denali National Park Subsistence Resource Commission supports a modified version of WP 18-18. Specifically, the SRC recommends amending the proposal to extend the harvest of bull antlered moose to September 25 and not beyond. Generally winter moose meat is of low quality in the winter. There is a need to protect the moose population, it is too easy to hunt moose in the winter when they bunch up. Cantwell is on the highway and railroad corridor, which provide road/train kill opportunities for meat for those who may not get what they need during the hunting season. If the season is extended by five days in the fall it would give more opportunity to subsistence hunters, since moose rut is currently

Chair: Raymond Collins; **Members:** Jeff Burney, Eleanor Dementi, Penny Green, Miki Collins, James Roberts, Lester Erhart, Victor Lord

occurring later in the season than in the past. It would be advantageous to subsistence users to have a longer season so that there would be cooler weather for hanging meat and more opportunity to hunt when the moose when the sport season is closed for hunting.

WP 18-19 Revise federal registration permits for GMU 13 to allow Ahtna Intertribal Resource Commission (AITRC) to issue Federal permits to Ahtna stakeholders

The Denali National Park Subsistence Resource Commission supports a modified version of WP 18-19. Specifically the SRC recommends amending the proposal to support the potential for the AITC to issue all permits. This proposal was submitted by AITC. The Denali SRC supports Denali National Park collaborating with AITC to issue federal subsistence moose and caribou permits for GMU 13 in Cantwell. Partnering with AITC provides an opportunity for the Park to share information and develop relationships with AITC and local subsistence users.

WP 18-51 State wide proposal- Modify baiting restrictions to align with state regulations

The Denali National Park Subsistence Resource Commission does not support WP 18-51 as written. The Denali SRC adopted WP 18-51 to align the federal regulations with the state and amended the proposal to include only natural bait. The SRC is concerned about bears getting accustomed to people food. If bears get used to non-natural bait, they are going to be more aggressive to campers. The SRC does not want bears acclimated to human food on federal lands. Although currently non-natural bait is not allowed on NPS lands, it is anticipated that if non-natural bait is legal on federal lands there will be future pressure to allow non-natural baiting on NPS lands. Other parks have severe problems with bears and Denali is lucky due to management and education efforts we have a lack of acclimation. It is difficult to reverse acclimation.

Thank you for the opportunity to comment.

Sincerely,



Raymond Collins
Chair

cc: NPS Regional Director
Superintendent, Denali National Park and Preserve
Southcentral and Eastern Interior Regional Advisory Councils
Governor of Alaska

Chair: Raymond Collins; **Members:** Jeff Burney, Eleanor Dementi, Penny Green, Miki Collins, James Roberts, Lester Erhart, Victor Lord

Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

November 2, 2017

Anthony Christianson, Chair
Federal Subsistence Board
U.S. Fish and Wildlife Service
Office of Subsistence Management
1011 E. Tudor Road, MS-121
Anchorage, AK 99503

Subject: Federal Subsistence Management Program Wildlife Proposals for 2018-2020

Dear Mr. Christianson:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center, Alaska, on October 26 and 27, 2017. The commission is a federal advisory committee that represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve. At this meeting, the SRC reviewed the federal subsistence wildlife proposals for the Wrangell-St. Elias area being considered for the 2018-2020 regulatory cycle and would like to provide the following comments:

WP18-10: Change moose hunting areas and seasons (Unit 5A)

The Wrangell-St. Elias National Park Subsistence Resource Commission supports WP18-10. This change will provide an opportunity for local residents to harvest moose before the rut. Additionally, opening the season earlier will improve access. During September, fishermen would already be in the hunt area with their boats. The area is difficult to access by boat after October 1 due to fall storms.

WP18-13: Remove trap marking requirement under federal regulations (Unit 1-5)

The Wrangell-St. Elias National Park Subsistence Resource Commission supports WP18-13. Aligning state and federal regulations simplifies the regulations.

WP18-14: Change season dates for wolverine hunting and trapping (Units 11 and 13)

The Wrangell-St. Elias National Park Subsistence Resource Commission supports WP18-14, which the SRC submitted, with modification that it only apply to Unit 11. This modification is based on public testimony and commission discussion during the meeting. Federal lands in Unit 13 are more accessible and see increased snowmachine traffic during February as the weather warms up. Extending the seasons in Unit 13 has the potential to be a conservation concern. Unit 11 is more difficult to access and could support the longer season.

WP18-16/50: Extend winter moose season (southern portion of Unit 11)

The Wrangell-St. Elias National Park Subsistence Resource Commission supports WP18-16/50. Extending the season will give hunters a better opportunity to safely cross the Chitina River to access the hunt area.

Chair: Daniel Stevens; Members: Don Horrell, Gloria Stickwan, Karen Linnell, Jamie Marunde, Raymond Sensmeier, Robert Fithian, Sue Entsminger, and Suzanne McCarthy

WP18-17: Extend moose season and revise permitting system (Unit 11)

The Wrangell-St. Elias National Park Subsistence Resource Commission voted to take no action on WP18-17 based on its action on WP18-19.

WP18-18: Extend moose season and revise permitting system (Unit 13)

The Wrangell-St. Elias National Park Subsistence Resource Commission voted to take no action on WP18-18 based on its action on WP18-19.

WP18-19: Revise permitting system for caribou (Unit 13)

The Wrangell-St. Elias National Park Subsistence Resource supports WP18-19 with modification that it also applies to moose hunts in Units 11 and 13 and that the Ahtna Intertribal Resource Commission (AITRC) have the authority to issue permits to all federally qualified subsistence users, not just tribal members. The SRC supports the idea of AITRC issuing federal subsistence permits, however, recommends that they be able to issue permits to all qualified hunters, noting that it is important to work together without dividing communities.

WP18-51: Modify bear baiting restrictions to align with state regulations (statewide)

The Wrangell-St. Elias National Park Subsistence Resource Commission supports WP18-51 as modified by the Office of Subsistence Management. Aligning state and federal definitions of bait will simplify the regulations and make them easier for users to understand.

WP18-54: Increase harvest limit for caribou and delegate authority to set harvest limit for the to be announced winter season (portion of Unit 12)

The Wrangell-St. Elias National Park Subsistence Resource Commission supports WP18-54 as modified by OSM with two additional modifications. The SRC's modifications are to establish a harvest limit of up to two caribou and also to include consultation with affected tribes and the Ahtna Intertribal Resource Commission in the process of exercising the delegation of authority. Increasing the harvest limit to up to two caribou provides additional flexibility and is consistent with the harvest limit for the Unit 13 caribou hunt, which also targets the Nelchina caribou herd. The Commission felt that a harvest limit of up to three caribou was too high, especially given concerns about the Mentasta caribou herd.

WP18-55: Extend winter and fall moose seasons (portion of Unit 12)

The Wrangell-St. Elias National Park Subsistence Resource Commission opposes WP18-55. In terms of the fall hunt, the SRC did not support extending the season into the rut. With respect to the winter season, that season is already three months long. Five months is too long for the winter season. Extending the season later in the spring, when days are longer and it is easier to get out on snowmachines, could result in increased harvest. The Commission also heard public comments opposing the proposal.

Thank you for the opportunity to comment.

Sincerely,



Daniel E. Stevens
Chair

cc: NPS Alaska Regional Director
Superintendent, Wrangell-St. Elias National Park and Preserve
Southeast, Southcentral and Eastern Interior Regional Advisory Councils
Governor of Alaska

Chair: Daniel Stevens; Members: Don Horrell, Gloria Stickwan, Karen Linnell, Jamie Marunde, Raymond Sensmeier, Robert Fithian, Sue Entsminger, and Suzanne McCarthy

LAKE CLARK NATIONAL PARK
SUBSISTENCE RESOURCE COMMISSION
1 Park Place
Port Alsworth, AK 99653

October 16, 2017

Ms. Molly B. Chythlook, Chair
Bristol Bay Regional Advisory Council
c/o U.S. Fish and Wildlife Service
1011 East Tudor Road MS 121
Anchorage, Alaska 99503



Dear Ms. Chythlook,

The Lake Clark National Park Subsistence Resource Commission (SRC) met in Port Alsworth, Alaska on October 4, 2017. The SRC reviewed the federal subsistence wildlife proposals for the Lake Clark area being considered for the 2018-2020 regulatory cycle and would like to provide comments for the following proposals:

WP18-21: Change the harvest limit for the Mulchatna Caribou Herd to 2 caribou with no additional restrictions in portions of Units 9, 17 and 19. Consolidate several hunt areas.

The Lake Clark National Park Subsistence Resource Commission supports WP18-21 as written.

WP18-24: Federally qualified subsistence users be allowed to use a snowmachine to position caribou, wolves, and wolverines for harvest in Unit 17, provided the animals are not shot from a moving vehicle.

The Lake Clark National Park Subsistence Resource Commission discussed this proposal and decided not to comment, since the use of snowmachines is already allowed for access to hunting grounds within Lake Clark National Park (though not for positioning of game).

WP18-51: Federal (statewide) bear baiting restrictions be aligned with Sate regulations, specifically the use of biodegradable materials.

The Lake Clark National Park Subsistence Resource Commission does not recognize bear baiting as an established traditional method of hunting bears in the Lake Clark region. The SRC believes the term "any biodegradable material" is too broad, because it may include items such as commercial dog food, baked goods, anise, and syrup that are not considered traditional bait. If bait were allowed, the only bait appropriate for hunting purposes should be limited to fish and wildlife remains indigenous to the area.

Thank you for the opportunity to comment.

Sincerely,

Glen Alsworth Sr., Chair
Lake Clark National Park
Subsistence Resource Commission

cc: NPS Alaska Regional Director
Superintendent, Lake Clark National Park and Preserve

Chair: Glen Alsworth Sr.; Members: Lary Hill, George Alexie, Tinny Hedlund, Lyle Wilder, Steve Kahn, Senafont Shugak Jr., Agnes Rychnovsky

Cape Krusenstern National Monument Subsistence Resource Commission

P.O. Box 1029
Kotzebue, AK 99752

October 11, 2017

Enoch Shiedt, Chair
Northwest Arctic Subsistence
Regional Advisory Council
U.S. Fish & Wildlife Service
Office of Subsistence Management
1101 East Tudor Road, MS 121
Anchorage, Alaska 99503

Dear Chairman Shiedt and NWA RAC Council Members,

This letter explains comments made by the Cape Krusenstern National Monument Subsistence Resource Commission on the 2018-20 Wildlife Regulatory proposals to the Federal Subsistence Board. The commission met on October 4th and 5th. Actions taken and comments from the members are reflected below.

WP18-32: The Commission voted to **oppose** the proposal with the reasoning that they want the season dates to stay the way they are currently listed in regulations.

WP18-41: The Commission voted to **support** the proposal.

WP18-42: The Commission voted to **take no action** on WP18-42 because of their support for WP18-41.

WP18-43: The commission voted to **support** the OSM modification. On the subsistence use of bear, Hannah Loon said "There is more of a bear nuisance in the coastal area and the Lower Kobuk to Selawik area than in the upper Kobuk area. People hunting in Cape Krusenstern may not want to salvage the meat because of the taste. It is traditional to leave the head in the field. Bear fat is very important to people. Like bacon or seal oil." The commission agreed that although the subsistence harvest of bear is unpopular, they wanted subsistence users to have every opportunity to harvest bears. Alex Whiting commented: "If someone wants to harvest a bear in December for the meat, then they should have total freedom to do that. This proposal will give them the opportunity to do that." They expressed their support for aligning state and federal regulations that is taken into consideration in the OSM modification. Enoch Mitchell also commented with some concern about abuse of the regulation: "If it is being abused we can change it. We have to make sure that young people are not misusing the regulation to hunt bears just to sell the hide and if there was waste of meat."

Chairman: Enoch Attamuk Shiedt Sr.; Members: Hannah Paniyavluk Loon, Cyrus Harris, Enoch Mitchell, Enoch Adams Jr., Larry Westlake Sr., Alex Whiting, Thurston Booth

Cape Krusenstern National Monument Subsistence Resource Commission

P.O. Box 1029
Kotzebue, AK 99752

WP18-44: The Commission voted to **take no action** on WP18-44. In discussion, Alex Whiting expressed concern that the proposal would necessitate that the NPS administer the bear hunt because of conflicts with the state requirements. Hannah Loon also expressed that it was not traditional to sell hides.

WP18-45: The Commission voted to **oppose** WP18-45. In their comments, the Commission approved of the 5 caribou a day bag limit that is currently in regulation and thought that it was fitting for the level of conservation for the WACH.

WP18-46: The Commission voted to **support** OSM modification of WP18-46. Enoch Mitchell commented that the 2017-2018 closure had worked for Noatak to harvest their needed caribou, but Alex Whiting liked the OSM modification to include from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; north of the Noatak River between, and including, the Kelly and Nimiuktuk River drainages.

WP18-47: The Commission voted to **take no action** on WP18-47 for their support of WP18-46 addressed their concerns about closing federal lands for caribou hunting.

WP18-48: The Commission voted to **support** WP18-48.

WP18-49: The Commission voted to **take no action** on WP18-49 because their support for WP18-48 addressed their concerns about caribou harvest reporting.

WP18-57: The Commission voted to **support** WP18-57 because they were concerned that the traditional lands of the North Slope Inupiaq are accessible through the haul road. They support WP18-57 as a show of solidarity with the North Slope RAC.

In closing, thank you for the opportunity to submit official comments on the 2018-20 Wildlife Regulation Proposals. Thank you for your work to represent the Northwest Arctic Region in the federal regulatory process.

Sincerely,
Attamak Shiedt



Enoch Attamak Shiedt Sr., Chair
Cape Krusenstern National Monument Subsistence Resource Commission

/Signed copy to file/

Chairman: Enoch Attamak Shiedt Sr.; Members: Hannah Paniyavluk Loon, Cyrus Harris, Enoch Mitchell, Enoch Adams Jr., Larry Westlake Sr., Alex Whiting, Thurston Booth

**GATES OF THE ARCTIC NATIONAL PARK
SUBSISTENCE RESOURCE COMMISSION
4175 Geist Road
Fairbanks, AK 99709
(907) 455-0631 or FAX (907) 455-0601**

August 29, 2017

Anthony Christianson, Chair
Federal Subsistence Board
U.S. Fish and Wildlife Service
Office of Subsistence Management
1011 E. Tudor Road, Mail Stop 121
Anchorage, Alaska 99503

Dear Chairman Christianson,

The Gates of the Arctic National Park Subsistence Resource Commission (SRC) met on August 28, 2017 via teleconference in order to informally share information on the federal subsistence wildlife proposals for the Gates of the Arctic area being considered for the 2018-2020 regulatory cycle. No formal votes were taken.

The following are SRC member comments on related proposals:

WP18-32: Change caribou season dates in Units 21D, 22, 23, 24, 25A (West), 26A, and 26B.

Local people try to harvest caribou when they are in the area because when the caribou are gone, they're gone. Local people try to get enough caribou for their subsistence needs and sometimes that means harvesting cows when they are near communities. The current regulations state that cows may be taken, but not cows with calves.

WP18-34: Extend the lynx trapping season in Unit 24A from Nov. 1 to Feb. 28 to Nov. 1 to March 31.

No comments.

WP18-35: Federal regulations for moose in Unit 24B be adjusted to align with the recently adopted State regulations for the winter season in this area.

In support of simplifying the permitting system and having it under the state reporting requirements.

WP18-41: Moose seasons be modified throughout Unit 23 to a two month cow season of Nov. 1 – Dec. 31, a shortening of the bull season from July 1 – Mar. 31 to July 1 – Dec. 31, and alignment of Federal and State hunt areas.

In support of this proposal. In the Upper Kobuk, the bulls enter rut around the middle part of September and no local rural users will shoot bulls after that. Still allows for a bull season after they come out of rut.

WP18-42: Moose seasons be modified throughout Unit 23 to include a winter any moose Federal registration permit hunt with a harvest quota aimed at reducing total cow harvest

by 20%, and the harvest limit be modified from one moose to one bull moose during the rest of the season.

No comments.

WP18-43: Unit 23 brown bear harvest limit be increased from one to three bears and that the season be extended to year round.

In the Upper Kobuk, hunters have been seeing more brown bears than ever before. People think they are coming down to the river from the mountains. There's been reports on the Upper Kobuk River all the way down to Kiana. Also, have observed larger numbers of brown bears on the Noatak River. Not many people harvest bears, but there are certain people that do, so they wouldn't be opposed to allowing harvest.

WP18-44: Allow the sale of up to two raw/untanned brown bear hides (with claws attached) and/or skulls per regulatory year, from brown bears legally harvested by Federally qualified subsistence users on Federal public lands in Unit 23.

Under federal subsistence regulations, you are required to salvage the meat. There would have to be a separate proposal to change that part. It should have been included in the original proposal to eliminate the salvage of meat in GMU 23. You can sell the skin and skull, but to discard the meat is illegal.

WP18-45: Caribou harvest limit in Unit 23 be reduced from 5 caribou per day to 3 caribou per day.

In support of this proposal. There continues to be a conservation concern. This is a reasonable proposal because most of the caribou hunting is done by boat and if there's 2 family members in a boat that would equal 6 caribou and that would be fair. Some villages have to travel over 50 miles on the river and most people hunt with another person, so that works out fine.

WP18-46: Federal public lands in Unit 23 be closed to caribou hunting except by Federally qualified subsistence users.

The question was asked that if proposal 18-45 was submitted to lower the bag limit from 5 caribou per day to 3 caribou, why would it be necessary to submit this proposal to close federal public lands to non-federally qualified users? This proposal is asking for harsher restrictions. Concerns that non-federally qualified users would move to State lands to go caribou hunting and there are State lands near the community of Ambler where thousands of caribou go through.

WP18-47: Federal public lands in Unit 23 be closed to caribou hunting except by Federally qualified subsistence users. Specifically requests that the closure extend from 2018/2019 to 2020/2021 only.

Already made comments on WP18-46 which is a similar proposal.

WP18-48: Federal reporting requirements for caribou in Units 22, 23, 26A be aligned with the State's registration permit requirements.

In general, the North Slope communities are not in favor of supporting this regulatory change. The main reason is harvest information could be collected in a more accurate and trustworthy way through harvest surveys conducted by the North Slope Borough Department of Wildlife Management. Many of the communities on the North Slope still need to be informed that there's now a State regulation for caribou harvest tickets in these same game management units.

WP18-49: Federal reporting requirements for caribou in Units 22, 23, 26A be aligned with the State's registration permit requirements.

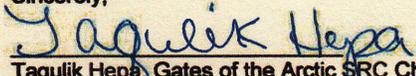
Already made comments on WP18-46 which is a similar proposal

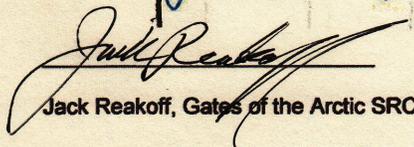
WP18-57: Federal public lands in Units 26A and 26B be closed to caribou hunting by non-Federally qualified users (NFQU).

The intention was to minimize the competition between local rural users and non-Federally qualified users.

Thank you for your time and consideration.

Sincerely,


Taqulik Hepa, Gates of the Arctic SRC Chair


Jack Reakoff, Gates of the Arctic SRC Vice-Chair

Taqulik Hepa (Chairperson), Jack Reakoff (Vice-Chairperson), Louie Commack, Tim Fickus, Esther Hugo, Pollock Simon Sr., Hugh Bifelt, and Raymond Woods

**Kobuk Valley National Park
Subsistence Resource Commission**

P.O. Box 1029
Kotzebue, AK 99752

October 13, 2017

Enoch Shiedt, Chair
Northwest Arctic Subsistence
Regional Advisory Council
U.S. Fish & Wildlife Service
Office of Subsistence Management
1101 East Tudor Road, MS 121
Anchorage, Alaska 99503

Dear Chairman Shiedt,

This letter details official comment made by the Kobuk Valley National Park Subsistence Resource Commission on the 2018-20 Wildlife Regulation proposals to the Federal Subsistence Board. The commission met on October 2 and 3. Actions taken and comments from the members are reflected below.

WP18-41: The Commission voted to **support** the proposal because it aligns the federal bull moose hunt with the state bull moose hunt, but does not limit opportunity for harvesting antlerless moose in the fall/winter season.

WP18-42: The Commission voted to **take no action** WP18-42.

WP18-43: the commission agreed that bears have been causing problems with the caribou herd migration. Members of the commission were concerned about increasing subsistence harvest when subsistence harvest of bear meat is unpopular. Gordon Newlin talked about the change in subsistence harvest of bears: "we are in an area where some of the bears taste like coastal where they eat seals. The population developed a lot and has moved to our area. Bear fat oil use in the past. Mainly for cooking. Some people store it to put away for a medicine. We don't use it that much anymore since we have clinics in every village. That cuts down how much people are harvesting bears. It has cut down how much people are harvesting." Greta Schuerch thought that there could be confusion: "pay attention to subsistence harvest requirements for taking the meat. If the hunter is confused about the regulation, then they could feel consequences: wanton waste." Most of the commission members were in favor the intent of the OSM modification to the proposal to align with the state regulation by changing it from 1 to 2 bear bag limit rather than 1 to 3 bear bag limit.

Chairman: Louie Commack; Co-Chair: Shield Downey; Members: Gordon Newlin, Greta Schuerch, Nellie Griest, Rosa Horner, Murphy Custer, Enoch Mitchell

Kobuk Valley National Park Subsistence Resource Commission

P.O. Box 1029
Kotzebue, AK 99752

WP18-44: The Commission voted to **take no action**. In discussion of the proposal, Shield Downey said “I have never heard of people selling hides and claws, this would be putting other people’s values on us.”

WP18-45: The Commission voted to **oppose** the proposal. In discussion, commission members talked about the difficulty of harvesting enough caribou for all of the families in their communities with the obstacles of price of gas and an unpredictable migration. The members do not want to change the bag limit from 3 to 5 caribou per day because this would become another obstacle to harvest enough meat. Some members expressed that an annual bag limit might be a conservation measure that would accommodate their need to hunt when the caribou are near and to hunt enough to provide for multiple families.

WP18-46/47: During discussion of the proposal, Enoch Mitchell said “the modifications are good, but we hope to keep it the same as it was in WSA17-03.” Shield Downey, Greta Schuerch, and Nellie Griest all questioned the impact of closing federal lands in the Noatak on the upper Kobuk hunting areas. Shield Downey relayed this concern: “Louie Commack is worried that fly in hunters will crowd Upper Kobuk on the Selawik side, state lands near Selawik.”

WP18-48: The Commission voted to **support** this proposal, encouraging everyone to do their part in the management of the herd. The commission supports gathering accurate harvest data from registration permit.

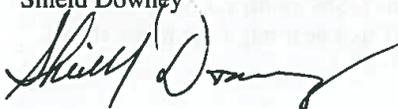
WP18-49: The Commission voted to **take no action** because their concerns about caribou harvest reporting were addressed in their support of WP18-48.

WP18-57: The Commission voted to **take no action**. Although the Commission did discuss impacts to subsistence users in GMU 23 from pushing non-federally qualified users to state lands, they felt that the North Slope RAC was able to handle issues in their region and that they did not know enough about potential impacts to make a decision.

WP18-32: The Commission voted to **oppose** the proposal.

In closing, thank you chairman for the opportunity to submit official comments on the 2016-18 Wildlife Regulation Proposals. Thank you for your work to represent the Northwest Arctic Region in the federal regulatory process.

Sincerely,
Shield Downey



Chairman: Louie Commack; Co-Chair: Shield Downey; Members: Gordon Newlin, Greta Schuerch, Nellie Griest, Rosa Horner, Murphy Custer, Enoch Mitchell

**Kobuk Valley National Park
Subsistence Resource Commission**

P.O. Box 1029
Kotzebue, AK 99752

Shield Downey, Co-Chair
Kobuk Valley National Park Subsistence Resource Commission

/Signed copy to file

Chairman: Louie Commack; Co-Chair: Shield Downey; Members: Gordon Newlin, Greta Schuerch,
Nellie Griest, Rosa Horner, Murphy Custer, Enoch Mitchell

Yukon Flats Fish and Game Advisory Committee Meeting
Fairbanks - Feb. 6, 2018

**Summary of Advisory Committee Action on Federal Wildlife Proposal WP18-56 –
Full Meeting Minutes to follow at a later date**

Quorum established with 9 of the 15 members present

Members Present: Larry Williams (Chair - Venetie), Jerrald John (Arctic Village), Paul Williams, Sr. (Beaver), Nick Henry (Chalkyitsik), Charles John (Circle), Andrew Firmin (Ft. Yukon), Paul Herbert (Fort Yukon), Edward Wiehl (Beaver) and Richard James, Sr. (Birch Creek).

Agenda Topic: Federal Issues – Review of relevant Federal Game Proposals

Federal Subsistence Proposal WP18-56

- The proposal requests that the Arctic Village Sheep Management Area (AVSMA) in Unit 25A be open to the harvest of sheep by non-Federally qualified users.
- Copies of the Executive Summary, including the Eastern Interior and North Slope Federal Subsistence Regional Advisory Councils recommendations were shared with the Advisory Committee
- Vince Mathews (Yukon Flats National Wildlife Refuge) gave an overview of the proposal and a summary of the Regional Advisory Councils recommendations and justifications
 - Eastern Interior Regional Advisory Council supported the proposal with the amendment to open only that portion of the AVSMA that is north of Cane Creek to the harvest of sheep by non-Federally qualified users. The amendment was to alleviate some potential conservation concerns to open only a portion the AVSMA.
 - North Slope Regional Advisory Council oppose the proposal
- Advisory Committee Discussion:
 - There has not been an increase in the sheep population even with the closure and limited harvest by federally qualified subsistence users. It should remain closed.
 - It was noted that the sheep population in the modified area could not support if the 51 people commenting in support of the proposal were to hunt there.
 - There was a general discussion about the importance of this area to Arctic Village and the need to maintain the closure.
 - The Advisory Committee member from Arctic Village shared the desire of several fellow village sheep hunters to be licensed guides for sheep for this area. The guide service discussion included the difficulties and challenges to become licensed guides.
 - Refuge staff pointed out the issue before them is opening the AVSMA to non-Federally qualified hunters. If the area was opened, then the desires for a guide service could be explored.
- Advisory Committee Action:
 - A motion to oppose the proposal was made and seconded. The motion passed unanimously (VOTE: 9-0-0).

Lower Kuskokwim Advisory Committee Meeting

Draft Agenda

October 25-26, 2017

ADF&G Office, 1:00 p.m.

Teleconference: 1.800.504.8071 Code: 5432709

Alaska Board of Game Statewide Regulations Meeting November 10 – 17, 2017 Anchorage			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (list Pros and Cons), Amendments to Proposal
FEDERAL SUBSISTENCE BOARD			
Proposal Number	Proposal Description		
WP18-21	Change harvest limit to 2 caribou throughout Mulchatna caribou herd range and consolidate hunt.		
Support	8	0	Phillip Peter moved to accept, seconded by John Andrew. Aligns state and feds.
WP18-27	Establish customary and traditional use determination for musk ox in Unit 18 for residents of Nunivak Island.		
No Action			Phillip- the musk ox are increasing not only on Nunivak Island. I think Mekoryak need recognition from the state of AK. They are asking for recognition. Discussion that Nunivak guides were concerned that this might negatively affect them.
WP18-28	Addition of winter may-be-announced season for moose in Unit 18, Goodnews Bay.		
Support	8	0	Henry Parks- motion to adopt, 2 nd by Phillip Peter.
WP18-29	Lengthen moose season by one month in Unit 18 Remainder		
Support	8	0	Phillip Peter made a motion to adopt, 2 nd by John Twitchell Tim Andrew explained proposal. Alex Nick (Member of Public) originally from Russian Mission, now lives in Bethel. Does have concern on this proposal.. My comments, being from Unit 18 remainder and having hunted in that area. Although there is enough moose in the area, there may be some decline in the future. With today's young generation who don't care what they shoot at. There have been moose mortality that people don't know about bc they were wounded. Opposes this proposal. Phillip- sometimes there is a lot of snow, but lately our area has less snow. It makes it hard to travel. I don't mind lengthening due to the conditions. Low snow is hard on machines. It will help us bc of climate change, we do need to harvest food. In spring we crave fresh meat.
WP18-30	Shorten season and decrease harvest limit and possession limit for ptarmigan in Unit 18.		
Support as Amended			Henry Parks- Used snowshoe hare and moose as example. There used to be a lot of rabbits. We caught too many and now we don't see them anymore. We had a moratorium on the moose population and now the population has grown. As a

Lower Kuskokwim Advisory Committee Meeting

Draft Agenda

October 25-26, 2017

ADF&G Office, 1:00 p.m.

Teleconference: 1.800.504.8071 Code: 5432709

Alaska Board of Game Statewide Regulations Meeting November 10 – 17, 2017 Anchorage			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (list Pros and Cons), Amendments to Proposal
			<p>young man there were a lot of ptarmigan, we would catch just enough 7-10 of them. It is true that the population for ptarmigan has crashed. A lot of the mortality is attributed to the power lines, but now they don't see that any more either. I don't like the dates but like to support as amended to keep the closing date the same. John Twitchell- they may be affected by climate change. Everything now is happening early. In March we start gathering wood. I see a change in ptarmigan habitat.</p> <p>Charlie- in support of proposal but don't support closing the season early.</p> <p>Phillip- In Akiachak we are subsistence people and go out to hunt. In winter [past] we'd go to the Johnson River to hunt and saw all the ptarmigan. In the spring we made plans to go hunt all the ptarmigan, but when we went back we didn't see any. Back in the day there were a lot of snowshoe hares. Finally [recently] we saw one set of tracks and we were really happy. Perhaps the snowshoe hare are making a comeback. One time we were hunting ptarmigan by Kisaralik River and we saw some ptarmigan but they were smaller and the markings were different: dark markings not red. My grandmother asked if I went to the mountains, she knew they came from the mountains and was happy to eat what she grew up on.</p> <p>Alex Nick (member of public)- I do not agree with historical evidence. I would recommend that the justification be revised.</p> <p>Charlie- we get only what we want to cook and dry. They aren't the primary game. We don't reach this 100 in possession.</p> <p>Amending: to close at April 30.</p>
WP18-31	Shorten caribou season in portions of Unit 18 by 15 days.		
Support	8	0	<p>Phillip Peter, moved to adopt, John Andrew seconded.</p> <p>Charlie- Eek agreed with the Feb. 28 closure, because in March they are pregnant and they didn't want to disturb them.</p> <p>Phillip- If we do hunt for one month it will disseminate the population. We have seen 5 hunters shooting at the caribou. Some were wounded and ran away. They are just shooting out of contempt for what we are telling them. Regulation say to hunt 2 that is what we do. I like the intent of the proposal because the population is declining. Even if it is a small window I am okay with that.</p>
WP18-51	Modify bear baiting restrictions to align with State regulations.		
Oppose	1	7	<p>Unclassified game was defined. This would align federal and state.</p> <p>Henry Parks adopted, 2nd by Phillip Peter</p> <p>Henry Parks- in the tundra villages we don't use bear baiting, so I have nothing to add.</p> <p>Alex Nick (member of public)- said that baiting of any game is not traditional for Native people, especially in the summer time. Game and fish are being processed. Don't agree with the bear baiting near fishcamps. I would not support</p>

Lower Kuskokwim Advisory Committee Meeting

Draft Agenda

October 25-26, 2017

ADF&G Office, 1:00 p.m.

Teleconference: 1.800.504.8071 Code: 5432709

Alaska Board of Game Statewide Regulations Meeting November 10 - 17, 2017 Anchorage			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (list Pros and Cons), Amendments to Proposal
			any bear baiting near villages. John Twitchell- I do not agree with the baiting. Baiting can affect the quality of the meat. We do not use the baiting stations in our area. Henry Parks- should do a roll call vote.

Adjournment:

Minutes Recorded By: _____

Minutes Approved By: _____

Date: _____

DRAFT

Lower Kuskokwim Advisory Committee Meeting

Draft Agenda

October 25-26, 2017

ADF&G Office, 1:00 p.m.

Teleconference: 1.800.504.8071 Code: 5432709

Alaska Board of Game Statewide Regulations Meeting
November 10 - 17, 2017 | Anchorage

Proposal Number	Proposal Description	Number Support	Number Oppose	Comments, Discussion (list Pros and Cons), Amendments to Proposal
				any bear baiting near villages. John Twichell: I do not agree with the baiting. Baiting can affect the quality of the meat. We do not use the baiting stations in our area. Henry Parks - should do a roll call vote.

James A. Charles
LKAC Chairman

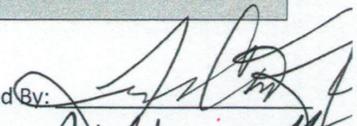
Adjournment:

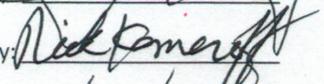
Minutes Recorded By: *[Signature]*
Minutes Approved By: *[Signature]*
Date: 10.27.17



**Federal Subsistence Board Wildlife
 April 2018**

Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (list Pros and Cons), Amendments to Proposal
WP18-21	Change harvest limit to 2 caribou throughout Mulchatna caribou herd range and consolidate hunt.		
support	8	0	Strongly supported this last year and would like to align it with the state regulations.
WP18-29	Lengthen moose season by one month in Unit 18 Remainder		
support	8	0	
WP18-30	Shorten season and decrease harvest limit and possession limit for ptarmigan in Unit 18.		
Support	8	0	Amendment: to keep the dates as Aug. 10- May 30.
WP18-31	Shorten caribou season in portions of Unit 18 by 15 days.		
Support	8	0	It is just changing the date and may help rebuild the herd.
WP18-33	Shorten season date to align with State and require State registration permit for moose in Unit 21E		
No Action			
WP 18-36	Align the state and federal seasons and permit requirement in Unit 21E.		
Support	8	0	
WP18-51	Modify bear baiting restrictions to align with State regulations.		
Support	8	0	This would align with state regulations.

Minutes Recorded By: 

Minutes Approved By: 

Date: 10/27/2017

This is an excerpt from the Coastal Lower Yukon AC 10/16-17/2017 meeting. For full minutes, please visit: http://www.adfg.alaska.gov/index.cfm?adfg=process.acinfo&ac=lower_yukon
Coastal Lower Yukon Fish and Game Advisory Committee

Meeting Minutes
October 16-17, 2017
ADF&G Office, Bethel

CALL TO ORDER: 1:25pm, Oct. 16, recessed at 5:30pm and reconvened at 9:00am Oct. 17.

ROLL CALL: Quorum 4: Ray Oney, David Bunyan, John Lamont, Stanley Pete (teleconference)

APPROVAL OF AGENDA:

APPROVAL OF PREVIOUS MEETING MINUTES: December 3, 2016

INTRODUCTIONS:

- a. Fish and Game Staff: Holly Carroll (CommFish), David Runfola (Sub. Division), Patrick Jones (Wildlife), Deena Jellan (CommFish), Jen Peeks (Boards)
- b. Other Agency Representatives: Ken Stahlnecker (USFWS), Sarah Mutter (AVCP), Eva Patton (USFWS)
- c. Members of the Public/ Other: Allen Hanson (Alakanuk Tribal Council), Christopher James (Alakanuk), Bill Alstrom (St. Mary's)

PUBLIC COMMENTS/ TESTIMONY:

- Stanley Pete- Nunam Iqua Tribe opposes (WP18-29) to extending the moose season.
- Allen Hanson- Wanted to be added to the CLY AC informational notices.

OLD BUSINESS:

OFFICER ELECTIONS-

John Lamont- Nominated for Vice-Chair, accepted

Secretary- Will discuss at next meeting.

Ray Oney will remain Chair

NEW BUSINESS:

FISHERIES

- **2017 Yukon Fishery Summary, ADF&G Staff**
Holly Carroll (ADF&G): Summer run exceeded 2016 run size. Good commercial catch of summer chum. Commercial harvest for chum was one of the highest on records. Overall commercial harvest was above average and earnings were better than 2016. ADF&G will not have a subsistence harvest estimate until December 2017. ADF&G would like to hear if subsistence fishing went well for people. Nearly all goals for Chinook and summer chum were met.
John Lamont: People were satisfied with the subsistence fishing, he hoped the run size continues to build.
Allen Hanson: Appreciated the management effort for subsistence harvest to meet people's needs. Keep up the good work ADF&G! He asked about the use of selective gear in the beginning of the summer 2018 noting the hard work to get the numbers up.
Holly Carroll: Responded probably for the next few years there may be selective gear. She commented on the Bering Sea project on juveniles that may help predict estimates. Next year may be a little smaller. We don't have a good idea on the run until a lot of the run have passed by. The selective gear allows harvest of summer chum while letting the Chinook salmon pass.
Ray Oney: 2017 was one of the better years thanks to ADFG and all the people involved with paying attention to the Emmonak ADFG reports. People were happy with commercial and subsistence outcomes in the lower Yukon. People were happy to keep their Chinook salmon and hopefully see a commercial in the future. Also, a good season for chum salmon.
- **Yukon River Agenda Change Requests (ACRs)**
 - ACR 13 – ACR 18: **Tabled until after BOF work session.**
- **Arctic/Yukon/Kuskokwim Finfish Proposal Deadline:** April 10, 2018
Jen Peeks reminded to let Tribes start thinking about fishing proposals

WILDLIFE:

- **Statewide Board of Game Proposals**
 - **PROPOSAL 4 –** 5 AAC 92.990(a)(26) Change the definition of "edible meat" for large game birds.
 - **PROPOSAL 6 –** 5 AAC 92.095: Allow the incidental take of up to two furbearers per year during an open season for other furbearers.

FEDERAL SUBSISTENCE BOARD

FEDERAL SUBSISTENCE BOARD			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (List Pros and Cons), Amendments to Proposal
WP18-21	Change harvest limit to 2 caribou throughout Mulchatna caribou herd range and consolidate hunt.		
Support	4	0	
WP18-27	Establish customary and traditional use determination for musk ox in Unit 18 for residents of Nunivak Island.		
Oppose	0	4	Ray- would oppose or take no action due to the potential effects it could have on the guiding service. John- would oppose in order to support the guiding families that live in Nunivak.
WP18-28	Addition of winter may-be-announced season for moose in Unit 18, Goodnews Bay.		
Support	4	0	Pat Jones (ADFG)- moose population is around 500. Population can support this.
WP18-29	Lengthen moose season by one month in Unit 18 Remainder		
Support	4	0	Stan- spoke with local residents and Nunam Iqua planning board opposes to extend the hunt. Stocks are healthy but individuals in the community would like to oppose it. They would like to see more investment in the schools to have their youth build a camp to harvest the moose. This may bring a larger influx of outsiders coming to Unit 18. <i>There was discussion on Unit 18 Remainder boundaries and moose population.</i> Stan- Now understanding how large the Unit 18 remainder is, I may be more willing to vote for this proposal. John- Yukon people help each other out through the use of customary and ceremonial use.
WP18-30	Shorten season and decrease harvest limit and possession limit for ptarmigan in Unit 18.		
Support as amended	4	0	Ray- The RAC discussed this proposal, people were saying that there was a decrease in the willow ptarmigan and people were seeing worms in the bird's stomachs. Stan- over the last years, noticed decline in ptarmigan numbers. They were so scarce. John- would like to see a decrease in the bag limit. Ray- would like to vote in favor Amend: Leave the season the same and shorten the bag limit.
WP18-31	Shorten caribou season in portions of Unit 18 by 15 days.		
Oppose	0	4	Ray- Accepting the proposal would bring it out of alignment with the state. Stan- is predation high or are the hunters harvesting a lot? Patrick Jones (ADF&G) - harvest is not very high, couple hundred animals per year. This year survival rate was low due to bears, golden eagles and wolves. Not sure if it is a long term pattern or not. Stan- author of proposal may not know how many newborns are lost to predators compared to hunters. Leaning towards opposing. Not sure that the hunters are making a large impact on the herd. May need to be looked at again. John- oppose, may get more confusing with the hunting regulations. Ray- leaning toward opposing. Shortening by 15 days may not have any effects. Would think people would want to focus on keeping the closing dates the same.

WP18-51	Modify bear baiting restrictions to align with State regulations.		
Support	4	0	John- sounds like it will make things simpler to align the state and federal regulations. Ray- Would support it as well, it would make it simpler for hunters knowing that the date is the same for both state and feds sides.

Adjournment:

Minutes Recorded By: _____

Minutes Approved By: _____

Date: _____

MID-LOWER YUKON ADVISORY COMMITTEE MEETING MINUTES

January 09, 2018

1:00 p.m. City Hall, St. Mary's

Teleconference: 1.800.504.8071 Code: 5432709

Alaska Board of Fisheries Statewide Crab, Shrimp, and Miscellaneous Proposals March 6-9, 2018				
Prop.	Position	# Support	# Oppose	AC Comments, Discussion, Amendments, Voting Notes
				Tyson made motion, Waskey 2nd.
237				Repeal the District 6 commercial salmon fishing season fixed closure date and replace with a closure date established by emergency order.
	Support	4	0	<p>Carroll- Summarized proposal.</p> <p>Weingarth (public)- personal opinion, has a problem when over the years Dist. 6 fishers put proposals against the lower Yukon to expand any commercial fishery. Opposed to making an exception to expand a commercial fishery. Reallocation of the resources.</p> <p>Melvin (public)- after everything was shut down, is this saying that there will be a harvest for dog food after? Carroll- explained the fishery. For fall chum we never harvest all the surplus. ADFG can always close it if it becomes a conservation concern.</p> <p>Waskey- fishery only for dog food? Carroll-yes. Waskey- What if people from other areas want fish for dog food? Carroll- shipping cost would be too expensive for people in other areas to buy them.</p> <p>Waskey made motion, Guidry 2nd</p>

FEDERAL SUBSISTENCE BOARD

Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (List Pros and Cons), Amendments to Proposal
<u>WP18-29</u>	Lengthen moose season by one month in Unit 18 Remainder		
Support	4	0	
<u>WP18-30</u>	Shorten season and decrease harvest limit and possession limit for ptarmigan in Unit 18.		
SA	4	0	Patrick Jones (ADFG)- stated amendments made by other ACs to keep the current season but reduce bag limit.

MID-LOWER YUKON ADVISORY COMMITTEE MEETING MINUTES

January 09, 2018
1:00 p.m. City Hall, St. Mary's

Teleconference: 1.800.504.8071 Code: 5432709

			Amend: keep current season but reduce bag limit
WP18-31	Shorten caribou season in portions of Unit 18 by 15 days.		
Support			Jones provided an overview. Aug. 1-Feb. 28. Sven Paukan- Would it affect the north hunt? Jones- only affect Mulchatna herd.
	4	0	
WP18-51	Modify bear baiting restrictions to align with State regulations.		
			Jones-provided a summary. Aligning state and federal to be the same. State supports this proposal. Waskey- what species? Patrick- both black and brown bears.
	4	0	

Minutes Recorded By: _____

Minutes Approved By: _____

Date: _____

BETHEL Fish and Game Advisory Committee

October 3, 2017
ADF&G Office, Bethel

Regional Proposals:

- **WP18-27** – Establish customary and traditional use determination for musk ox in Unit 18 for residents of Nunivak Island.
- **WP18-28** – Addition of winter may-be-announced season for moose in Unit 18, Goodnews Bay.
- **WP18-29** – Lengthen moose season by one month in Unit 18 Remainder
- **WP18-30** – Shorten season and decrease harvest limit and possession limit for ptarmigan in Unit 18.
- **WP18-31** – Shorten caribou season in portions of Unit 18 by 15 days.

Crossover Proposals:

- **WP18-21** – Change harvest limit to 2 caribou throughout Mulchatna caribou herd range and consolidate hunt.
- **WP18-23** – Add residents of Units 9C and 9E to customary and traditional use determination for caribou in Units 17A and 17C.
- **WP18-25/26** – Establish new hunt area and may-be-announced season for moose in Unit 17C.
- **WP18-33/36** – Shorten season to align with State and require state registration permit for moose in Unit 21E.

Statewide Proposals:

- **WP18-51** – Modify bear baiting restrictions to align with State regulations.

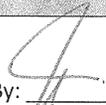
	160		Reauthorize antlerless moose hunting seasons in Unit 20D
	161		Reauthorize the antlerless moose season in the western portion of Unit 26A
	162		Reauthorize resident brown bear tag fee exemptions throughout Interior and Eastern Arctic Alaska
	163		Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A
Support	7	0	LaValle motion to support, 2 nd Tikiun
	164		Allow the use of crossbows in archery hunts for hunters 60 years of age and older.
NO ACTION			Kohl Motion to support, 2 nd Tikiun Kohl rescinds motion Kohl motion to take no action
	ACR 1		Open a registration hunt for moose in 19a
Support as Amended	6	0	Kohl Motion to support, 2 nd Tikiun LaValle motion to amend, 2 nd Kohl Amend to say: Registraion permits should be made available at all license venders in the Kuskokwim drainage. We want them available at all vendors in the Kuskokwim drainage because of the long history of tradition use from downriver villages hunting in this area.

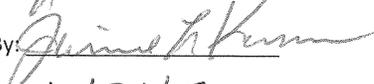
FEDERAL SUBSISTENCE BOARD

Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (List Pros and Cons), Amendments to Proposal
WP18-27	Establish customary and traditional use determination for musk ox in Unit 18 for residents of Nunivak Island.		
Support as amended	5	2	Kohl motion to support, 2 nd Tikiun Jones-background on muskox on the island and harvest history Riley Motion to amend, amend to add all federally qualified subsistence users of unit 18. Amendment passes LaValle, Kassman oppose, could really hurt the income of many residents of Nunivak Island if the guide industry goes away. Motion passes
WP18-28	Addition of winter may-be-announced season for moose in Unit 18, Goodnews Bay.		
Support	7	0	Kohl motion to support, 2 nd Tikiun
WP18-29	Lengthen moose season by one month in Unit 18 Remainder		
support	7	0	Kohl motion to support, 2 nd LaValle
WP18-30	Shorten season and decrease harvest limit and possession limit for ptarmigan in Unit 18.		

Support	4	0	Kohl motion to support, 2 nd Riley Discussed populations, heard of declining populations. Rodgers, Tikiun, Lekander abstain We would like the dates to remain the same, so that coastal villages get an opportunity to hunt.
WP18-31	Shorten caribou season in portions of Unit 18 by 15 days.		
	3	2	Kohl motion to support, 2 nd Riley LaValle and Kassman would like the season to stay aligned with the state.
WP18-21	Change harvest limit to 2 caribou throughout Mulchatna caribou herd range and consolidate hunt.		
Support	7	0	LaValle motion to support, 2 nd Tikiun We want it aligned
WP18-23	Add residents of Units 9C and 9E to customary and traditional use determination for caribou in Units 17A and 17C.		
No Action	7	0	Motion to take no action Kohl, 2 nd Tikiun
WP18-25/26	Establish new hunt area and may-be-announced season for moose in Unit 17C.		
No Action	7	0	Motion to take no action Kohl, 2 nd Riley
WP18-33/36	Shorten season to align with State and require state registration permit for moose in Unit 21E.		
	6	1	Kohl motion to support, 2 nd Lavalle Oppose Kohl, he likes the longer season.
WP18-51	Modify bear baiting restrictions to align with State regulations.		
Support	7	0	Kohl motion to support, 2 nd Riley

Adjournment:

Minutes Recorded By: 

Minutes Approved By: 

Date: 10/24/17

**CENTRAL BERING SEA
Fish and Game Advisory Committee**

October 10-11, 2017

ADF&G Office, 9:00am

570 4th Ave. Bethel, AK

Teleconference: 1.800.504.8071 Code: 5432709

Alaska Board of Game Central/Southwest Region Meeting
February 16 – 23, 2018 | Dillingham

Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (list Pros and Cons), Amendments to Proposal
147	Open a nonresident draw hunt for caribou in Units 18 and 19		
Oppose	0	10	Hunting season and bag limits for caribou. Open a nonresident draw hunt for caribou in Units 18 & 19. The Mulchatna herd is going down. Stanley Tom makes a motion to accept, seconded by Annie Cleveland. Motion fails with 10 roll call votes.
157	Reauthorize the nonresident antlerless moose season in the Remainder of Unit 18		
No Action			The current population for the moose in the remainder of Unit 18 is about 20,000. This would be reauthorized every year. ONC Andrews stated F&G is right that there are too many moose on the Yukon area. To take no action on proposal 157.
163	Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A		
Support	8	0	Brown bear tag fee exemption for the residents. Annie Cleveland moves to support the motion, seconded by Peter Julius. Motion passed.

FEDERAL SUBSISTENCE BOARD

WILDLIFE PROPOSALS

Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (list Pros and Cons), Amendments to Proposal
18-21	Support		
Support	10	0	To decrease the caribou to 2. Stanley Tom made a motion to support, seconded by Annie Cleveland. Question called. Roll call vote with 10 yes, and 1 abstained. Motion passed.

**CENTRAL BERING SEA
Fish and Game Advisory Committee**

October 10-11, 2017

ADF&G Office, 9:00am

570 4th Ave. Bethel, AK

Teleconference: 1.800.504.8071 Code: 5432709

**FEDERAL SUBSISTENCE BOARD
WILDLIFE PROPOSALS**

Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (list Pros and Cons), Amendments to Proposal
18-21 Support	10	0	To decrease the caribou to 2. Stanley Tom made a motion to support, seconded by Annie Cleveland. Question called. Roll call vote with 10 yes, and 1 abstained. Motion passed.
18-23 No Action			
18-25 No Action			Stanley Tom made a motion for no action. Seconded by Edward Lozano. Roll call vote with 11 yes votes , motion passed.
18-27 No Action			Establish a customary and traditional use for muskox on Nunivak Island for the residents of Nunivak Island. Annie Cleveland makes a motion for no action on this proposal, seconded by Stanley Tom. Question called. Motion for no action passed by roll call vote.
18-28 Support	10	0	Add winter moose hunt in and Platinum. Peter Julius states that he supports this proposal. Annie Cleveland made a motion to support the proposal seconded by Stanley Tom. Roll call vote, motion passed.
18-29 Support	10	0	Annie moves to support this proposal, seconded by Peter Julius. Question called. Motion passed with 10 roll call votes.
18-30 Support	11	0	To decrease the open season for caribou by 15 days for Unit 18.
18-31 Support	10	0	To decrease the open season for caribou by 15 days for Unit 18. Annie Cleveland make a motion to support, seconded by Stanley Tom. Question called. Roll call vote with 10 yes & 1 abstained. Motion passed.

**CENTRAL BERING SEA
Fish and Game Advisory Committee**

October 10-11, 2017

ADF&G Office, 9:00am

570 4th Ave. Bethel, AK

Teleconference: 1.800.504.8071 Code: 5432709

FEDERAL SUBSISTENCE BOARD

WILDLIFE PROPOSALS

Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (list Pros and Cons), Amendments to Proposal
18-21 Support	10	0	To decrease the caribou to 2. Stanley Tom made a motion to support, seconded by Annie Cleveland. Question called. Roll call vote with 10 yes, and 1 abstained. Motion passed.
18-51			
Support	10	0	Bear bait on Federal lands. Peter Julius made a motion to support, seconded by Benjamin Lozano. Question Called. Roll call vote with 10 yes votes, and 1 abstained.

Minutes Recorded By: St M. O'Neil

Minutes Approved By: [Signature]

Date: 10/27/17

Western Arctic Caribou Herd Working Group

Goal: To work together to ensure the long-term conservation of the Western Arctic Caribou Herd and the ecosystem on which it depends, to maintain traditional and other uses for the benefit of all people now and in the future.

Chair: Vern Cleveland, Sr.

Vice-Chair: Cyrus Harris

P.O. Box 175, Nome, AK 99762

January 30, 2018

Theo Matuskowitz, Regulations Specialist
Office of Subsistence Management
US Fish and Wildlife Service
1011 E. Tudor Road, Mail Stop 121
Anchorage, Alaska 99503

Submitted via email to: theo_matuskowitz@fws.gov

SUBJECT: Comments to Federal Subsistence Board on Wildlife Proposals

To Federal Subsistence Board:

At its December 13-14, 2017 meeting, the Western Arctic Caribou Herd Working Group (WG) voted to submit the following comments to the Federal Subsistence Board (FSB) regarding wildlife regulatory proposals affecting harvest of the Western Arctic herd that will be considered by the FSB at its April 2018 meeting.

- WP18-32 Caribou season dates – The WG voted 14:0 to oppose WP18-32. In discussion, the WG noted that the Regional Advisory Councils (RAC) have opposed this proposal and the change in season dates would unnecessarily complicate the regulations.
- WP18-45 Reduce caribou bag limit from 5-3 (Unit 23) – The WG voted 16:0 to oppose WP18-45. In discussion, the WG noted that the Northwest RAC opposes the proposal, the change would misalign the seasons, and the 2017 herd census does not indicate a conservation concern.
- WP18-46 Close federal lands except to federally qualified subsistence users (Unit 23) – The WG voted 13:2 to support WP18-46, with modifications that the closure would apply only to federal lands delineated in the FSB Special Action 17-03 and only for two years. In discussion, the WG members supporting the modified proposal noted that the closure will be limited to federal lands where user conflicts have been greatest in past years, will maintain access for non-federally qualified subsistence users to other federal lands in Unit 23, and will apply for only two years.
- WP18-47 Close federal lands except to federally qualified subsistence users (Unit 23) – The WG voted 15:0 to take no action on WP18-47.

- WP18-48 Establish registration permit (Units 22, 23, 26A) – The WG voted 14:0 to support WP18-48. In discussion, the WG noted that this proposal aligns federal and state regulations on harvest reporting and provides needed harvest data for herd management.
- WP18-49 Establish registration permit (Units 22, 23, 26A) – The WG voted unanimously to take no action on WP18-49.
- WP18-57 Close federal public lands except to federally qualified subsistence users (Units 26A, 26B) – The WG voted 8:7 to oppose WP18-57. In discussion preceding this close vote, the WG members opposing the proposal indicated that the area proposed for closure is too large and that there is not a conservation concern.

Thank you very much for this opportunity to comment.

On behalf of the Western Arctic Caribou Herd Working Group,

A handwritten signature in cursive script that reads "Vern Cleveland Sr.".

Vern Cleveland, Sr., Chair

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