

WP22-07 Executive Summary	
General Description	Wildlife Proposal WP22-07 requests that the Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner in Unit 4 be closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users. <i>Submitted by: Southeast Alaska Subsistence Regional Advisory Council.</i>
Proposed Regulation	<p style="text-align: center;">Unit 4 - Deer</p> <p><i>Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31. Aug. 1 – Jan. 31</i></p> <p><i>Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users hunting under these regulations.</i></p>
OSM Conclusion	Oppose
Southeast Alaska Subsistence Regional Advisory Council Recommendation	<p>Support WP22-07 with modification to remove wildlife analyses areas 4044 and 4043 from the proposed closure area. OSM’s interpretation of the Council’s intent is:</p> <p>The modification should read:</p> <p style="text-align: center;">Unit 4 - Deer</p> <p><i>Unit 4 — 6 deer; however, female deer may be taken only from Sept. 15 – Jan. 31. Aug. 1 - Jan. 31</i></p> <p><i>Drainages of Admiralty Island flowing into Chatham Strait between Fishery Point and Point Gardner, except drainages flowing into Thayer Lake, Hasselborg Lake, and Hasselborg Creek are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users.</i></p>

WP22-07 Executive Summary	
Interagency Staff Committee Comments	The ISC acknowledges the extensive discussion by the Council members about the closure policy application to this situation. This was one of four proposals for Unit 4, which overall has a healthy population of deer, but is experiencing subareas where subsistence users are not able to harvest enough deer for their needs. The Council submitted this proposal because of concerns brought to them by the affected Federally qualified subsistence users in Angoon about not meeting subsistence needs for deer. The proposal review process allowed them to review the available data and hear testimony from all affected users of the resources. During the meeting, they acknowledged that the data in the State reporting system used to measure effort does not reflect success in subsistence hunting because subsistence hunting of deer is opportunistic and users generally only report when they are successful. They crafted a modification in area and season that limits the impacts to the non-Federally qualified users and addresses the needs of subsistence users.
ADF&G Comments	Oppose
Written Public Comments	57 Oppose, 1 Neutral

**STAFF ANALYSIS
WP22-07**

ISSUES

Wildlife Proposal WP22-07, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Council), requests that Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner in Unit 4 be closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users.

DISCUSSION

The proponent states that it recently became more challenging for subsistence hunters in Angoon to harvest sufficient deer to meet their subsistence needs due to increased hunting pressure from non-Federally qualified users. They state that regulatory change is needed to protect the deer population from further depletion and increase opportunity for Federally qualified subsistence users.

Existing Federal Regulation

Unit 4 - Deer

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

Proposed Federal Regulation

Unit 4 - Deer

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

Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users hunting under these regulations.

Existing State Regulation

Unit 4 - Deer

<i>Chichagof Island east of Port Frederick and north of Tenakee Inlet</i>		
<i>3 deer total</i>	<i>Bucks</i>	<i>Aug. 1 – Sept. 14</i>
	<i>Any deer</i>	<i>Sept. 15 – Dec. 31</i>
<i>Remainder</i>		
<i>6 deer total</i>	<i>Bucks</i>	<i>Aug. 1 – Sept. 14</i>
	<i>Any deer</i>	<i>Sept. 15 – Dec. 31</i>

Extent of Federal Public Lands

Unit 4 is comprised of approximately 96% Federal Public Lands and consist of 99% U.S. Forest Service (USFS) managed lands and less than 1% National Park Service or U.S. Fish and Wildlife Service managed lands (**Figure 1**. Unit 4 map with proposal analysis area encircled in red.). It consists primarily of Admiralty, Baranof, and Chichagof Islands, along with some smaller adjacent islands.



Figure 1. Unit 4 map with proposal analysis area encircled in red.

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

CUSTOMARY AND TRADITIONAL USE DETERMINATION

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

Regulatory History

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

Since 1992, the State season has been from August 1 through December 31 with the antlerless deer season from September 15 through December 31. For Chichagof Island east of Port Frederick and north of Tenakee Inlet including all drainages into Tenakee Inlet, the harvest limit has been three deer while the harvest limit for the remainder of Unit 4 has been four deer. From the late 1980s through 1991, the State general season in the northeast Chichagof area had a harvest limit of three deer. However, the State subsistence season allowed six deer and the season was extended from August 1 until January 31. In 2019, the Board of Game increased the State bag limit from 4 to 6 deer in the Unit 4 remainder area, excluding Chichagof Island east of Port Frederick and north of Tenakee Inlet.

There were three regulatory proposals during the 2010 Federal subsistence wildlife cycle addressing Unit 4 deer regulations following the steep population drop that occurred during the prior harsh winters. These proposals analyzed a variety of timing and harvest restrictions to protect the deer population and subsistence priority. None of the proposals were adopted. Instead, Federal and State managers closed the doe harvest season in the Northeast Chichagof Controlled Use Area (NECCUA) for the 2010 regulatory year and portions of the 2011 and 2012 regulatory years to help the deer population recover from deep-snow winters of 2006 through 2009.

Proposal WP12-06 sought to rescind the January Federal deer season in Unit 4 but was rejected by the Federal Subsistence Board because it would not address a conservation concern and the January season is important for Federally qualified subsistence users. There have been no Federal regulatory changes since 2012.

Biological Background

Sitka black-tailed deer spend the winter and early spring at low elevation where less snow accumulates, and forests provide increased foraging opportunities. Fawning occurs in late May and early June as vegetation greens-up, providing abundant forage to meet the energetic needs of lactating does. Migratory deer follow the greening vegetation up to alpine for the summer. Resident deer remain at lower elevations. The breeding season, or rut, generally occurs in October through November and peaks in late November (ADF&G 2009). Wolves and black bears are not present in Unit 4, so the primary predator, besides humans, are brown bears. Brown bears are estimated to kill an amount of deer equal to 15%-20% of the annual total deer harvested by hunters (Mooney 2009). Unit 4 deer population levels fluctuate, primarily because of winter snow depths (Olson 1979).

Habitat

Old-growth forests are considered primary deer winter range, in part because the complex canopy cover allows sufficient sunlight through for forage plants to grow but intercepts snow, making it easier for deer to move and forage during winters when deep snow hinders access to other habitats. Some areas of Unit 4 have been impacted by large scale changes in habitat, while the habitat is largely intact in other areas.

Areas with substantial timber harvest, such as northeastern Chichagof and northwestern Baranof Islands, are expected to have lower long-term carrying capacity compared to pre-harvest conditions. Most of the area covered under this proposal is located in productive old-growth forests within Admiralty Island National Monument and Kootznoowoo Wilderness.

Population Information

McCoy (2017) outlines the limitations of estimating deer populations, while Bethune (2020) discusses the most recent deer population status in Unit 4. Overall, the deer population in Unit 4 has recovered from the mortality incurred during the severe winters of 2006-2008 and is probably reaching winter carrying capacity in some areas. There have not been any significant mortality events recorded since 2008 and recent winters have been mild with no significant snowfall.

While no pellet surveys have been recently conducted in the proposal area, surveys in other portions of Unit 4 have shown increases from prior years (McCoy 2019). Pellet counts conducted in 2019 in Pybus Bay, on the eastern side of Admiralty Island, increased by 106% from the previous survey in 1998, and surveys in other nearby Unit 4 areas surveyed (Pavlof Harbor and Kelp Bay) also indicated increasing populations.

ADF&G also conducts aerial surveys during summer in alpine habitat. Between 2014 and 2016, five aerial surveys were conducted on Admiralty Island with increasing results (**Figure 2**. Number of deer observed during five aerial surveys on Admiralty Island. (Lowell and Valkenburg 2017)., Lowell and Valkenburg 2017). The metrics specific to Admiralty Island were highest of all survey areas in Unit 4 (**Figure 3**).

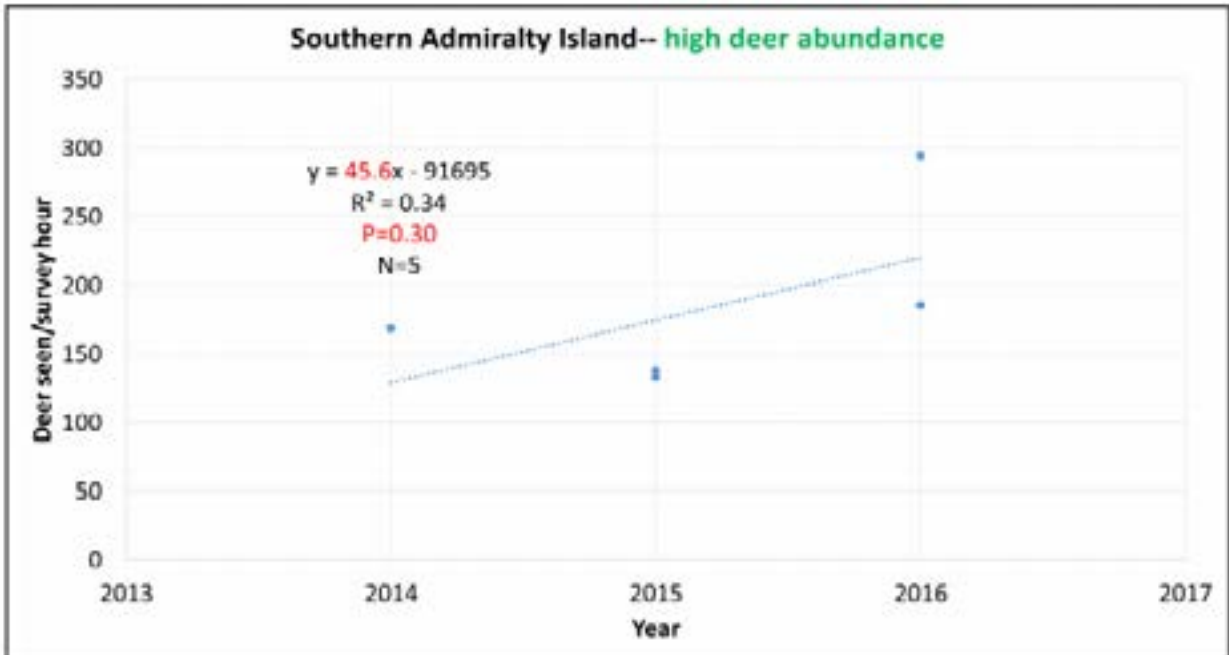


Figure 2. Number of deer observed during five aerial surveys on Admiralty Island. (Lowell and Valkenburg 2017).

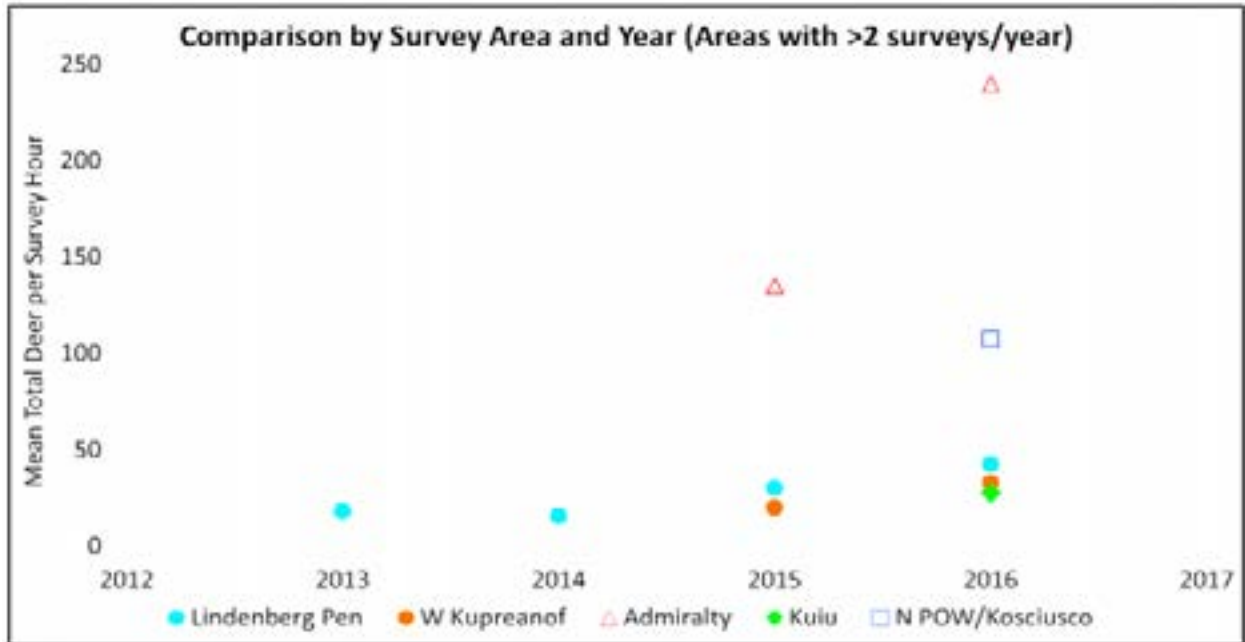


Figure 3. Average number of deer observed per hour during aerial alpine surveys in Southeast Alaska. (Lowell and Valkenburg 2017).

Cultural Knowledge and Traditional Practices

Deer are an important subsistence resource for rural residents throughout southeast Alaska. In a 2012 survey of Angoon residents, 49% of households reported attempting to harvest deer, 45% of households reported successfully harvesting deer, and 84% of households reported using deer (Sill and Koster 2017). An estimated 218 deer were harvested, for a total of 17,452 pounds, or 51 pounds per capita. The deer hunting areas documented in the survey ranged from Cube Cove to Whitewater Bay on Admiralty Island, and the Peril Strait areas of Baranof and Chichagof Islands (Figure 4. Reported deer hunting locations used by residents of Angoon. From Sill and Koster 2017.).

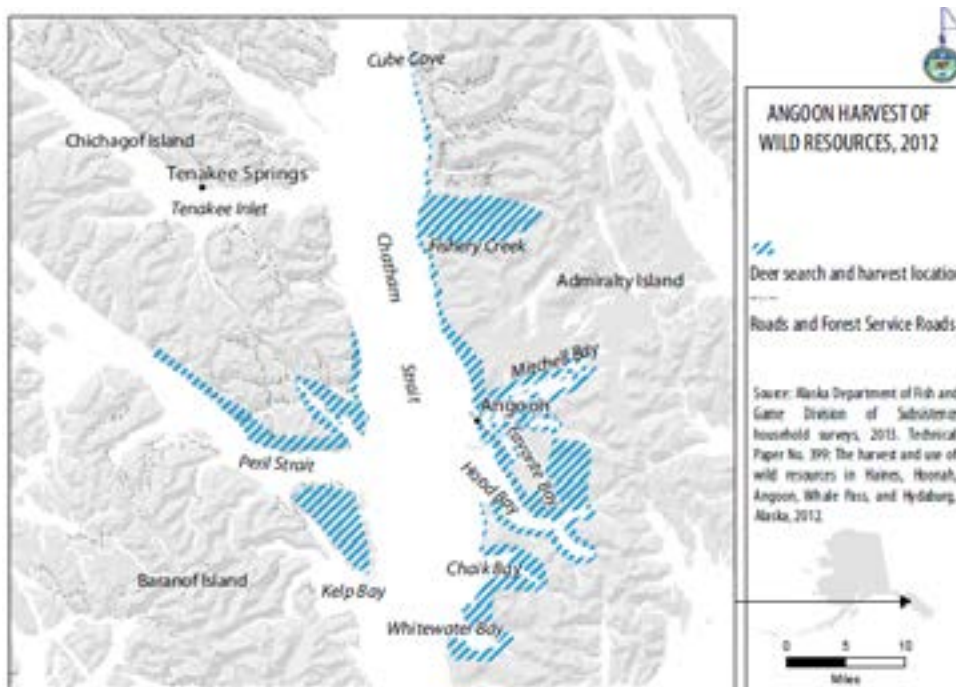


Figure 4. Reported deer hunting locations used by residents of Angoon. From Sill and Koster 2017.

The population of Angoon has been on a steady decline over the past two decades. In the 2000 census, the population was 572, dropping to 459 in the 2010 census, and was estimated at 404 in July 2019, a 30% decline over that time period (Robinson 2020). Angoon and nearby communities maintain strong ties to Juneau as a commercial and economic hub, and many rural residents of the area move to Juneau for economic opportunities. Based on year-to-year changes in residency of Permanent Fund Dividend applicants, an average of 61 residents of the Hoonah-Angoon census area moved to Juneau each year between 2009 and 2020, while an average of 47 moved from Juneau to the Hoonah-Angoon census area (Alaska Department of Labor and Workforce Development 2021).

Harvest History

The harvest data reported below is based on both mail-out surveys (pre-2011) and returned harvest reports (2011 and later) (ADF&G 2021, Bethune 2020). The overall average reporting rate is about 60-70% but may be much lower in some small rural communities. To account for hunters who did not report, data are proportionally expanded by community size. If the response rate is low within a community, a small number of hunters may have a disproportionate effect on the data. As confidence intervals are not available for these data, harvest numbers should be considered estimates and used with caution. Trends observed, especially at larger scales, are more likely to be indicative of general population change, however.

Harvest data from 2000 through 2019 were used to evaluate the deer harvest patterns and trends within the portion of western Admiralty Island addressed by the proposal the “proposal area.” Harvest and effort were grouped by Wildlife Analysis Area (WAA), which roughly corresponds to major watersheds or other distinct geographic areas. Since effort was calculated by WAA, individual hunters using multiple WAAs in a regulatory year may be counted multiple times and over-represented in calculations. The WAAs used

to represent the proposal area for the purposes of this analysis are displayed in Figure 5. Wildlife Analysis Areas within the WP22-07 analysis area..

The amount of hunter effort in the proposal area, as measured by numbers of hunters and hunter-days, stayed relatively stable between 2000 and 2019 (Figure 6. Number of Federally qualified and non-Federally qualified users using the proposal area, 2000-2019., Figure 7. Number of hunter-days by Federally qualified and non-Federally qualified users within the proposal area, 2000-2019.). Most of the effort is from non-Federally qualified users, mostly from Juneau, and represented 68% of the hunters and 74% of the hunter-days. The remaining 32% of hunters and 26% of the hunter-days are from Federally qualified subsistence users, the majority residing in Angoon.

Juneau residents comprised 52% of the hunter-days between 2000 and 2019, and Angoon residents comprised 29% (ADF&G 2021). Nonresident effort is low, representing only 2% of the hunter days. Angoon is the only community within the proposal area, and about 65% of the deer hunting effort and harvest by Angoon residents occurs within the proposal area. Most of Angoon's remaining hunting effort and harvest takes place on the east coast of Chichagof and Baranof Islands, across Chatham Strait from Angoon.

Two measures were used to assess the success rate of hunters over this time period: days hunted per deer harvested, and deer harvested per hunter. Between 2000 and 2019, the number of days it took to harvest a deer remained fairly constant (Figure 8. Number of days hunted per deer harvested by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.). Federally qualified subsistence users required fewer days to harvest a deer compared to non-Federally qualified users, however. The number of deer harvested per Federally qualified subsistence user declined between 2006 and 2009 but has remained relatively stable since then (Figure 9. Number of deer harvested per hunter by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.). Since 2009, the number of deer harvested per hunter has been roughly similar between Federally qualified and non-Federally qualified users.

The total number of deer harvested in the proposal area by both Federally qualified and non-Federally qualified users has varied over the years, likely due to changes in deer abundance (**Figure 10**. Number of deer harvested by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.). Most years, non-Federally qualified users harvested more deer from the proposal area due to the larger number hunters. Some of the variability in the harvest by Federally qualified subsistence users may be due to shifts in hunting locations. In recent years, the overall number of deer harvested by Angoon residents has remained relatively high, but a larger proportion has been taken from outside the proposal area, or from unknown locations (**Figure 11**. Total number of deer harvested by Angoon residents, by harvest location, 2000-2019.).

The State deer hunting season in the proposal area runs from August through December. Subsistence users hunting under Federal regulations are permitted to harvest deer during the month of January, as well. Most harvest occurs later in the season, as snow forces deer to lower elevations where they are easier to harvest. Nearly half (45%) of the harvest in Unit 4 occurs during the month of November; and 67% occurs from September through November (Table 1. Percentage of Unit 4 deer harvest by month and user type, 2000-2019.). Data are available monthly, so the proportion of deer taken before and after September 15 could not be calculated.



Figure 5. Wildlife Analysis Areas within the WP22-07 analysis area.

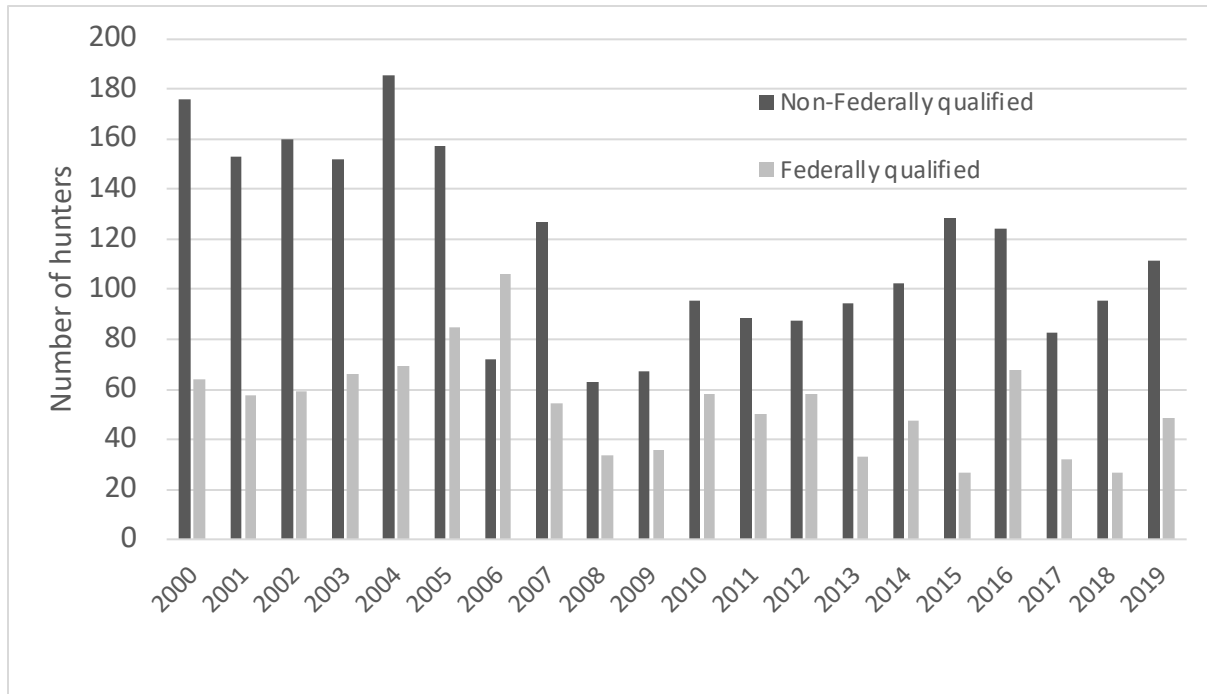


Figure 6. Number of Federally qualified and non-Federally qualified users using the proposal area, 2000-2019.

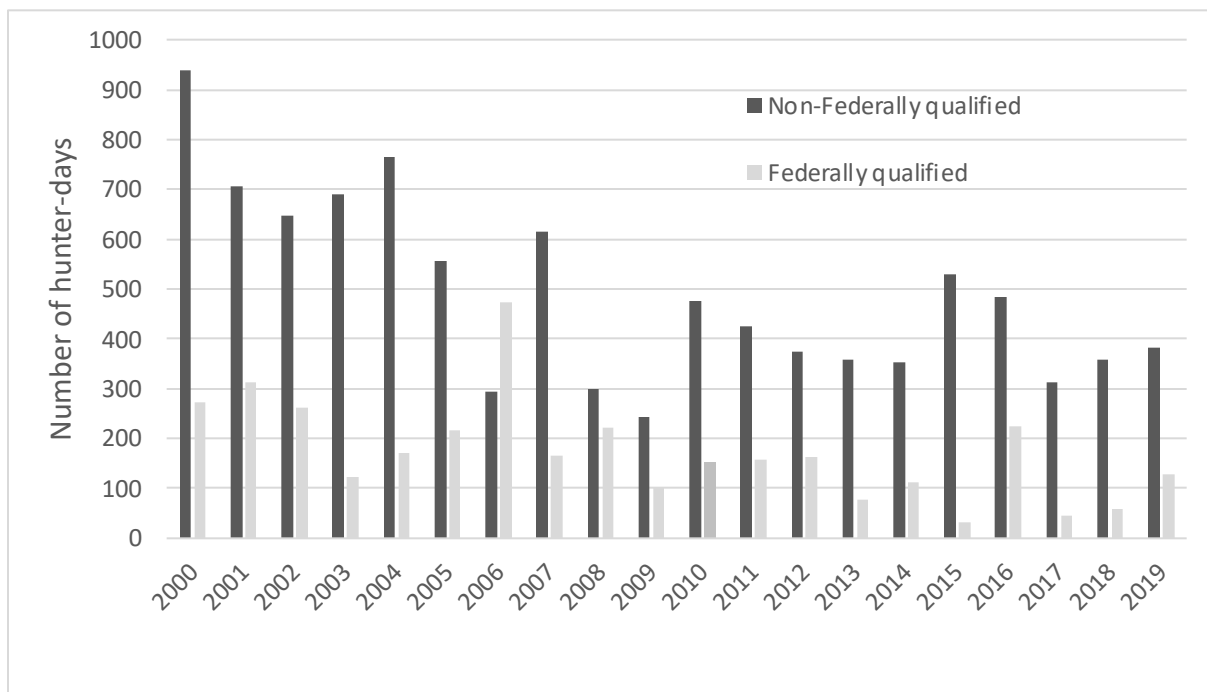


Figure 7. Number of hunter-days by Federally qualified and non-Federally qualified users within the proposal area, 2000-2019.

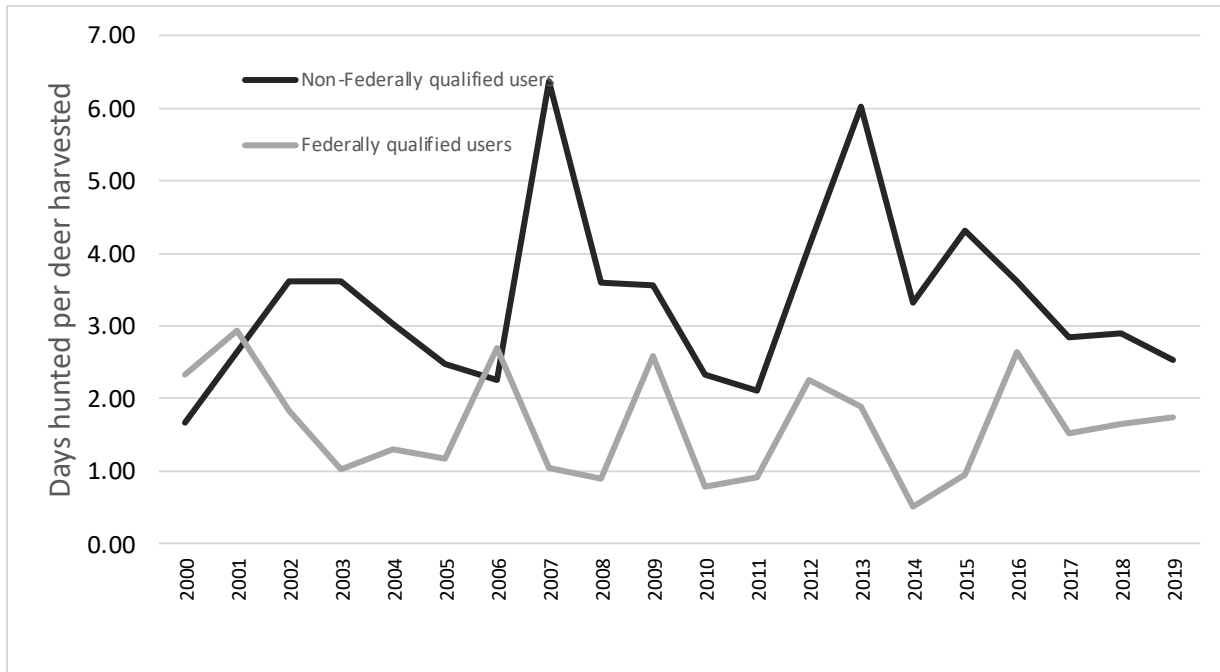


Figure 8. Number of days hunted per deer harvested by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.

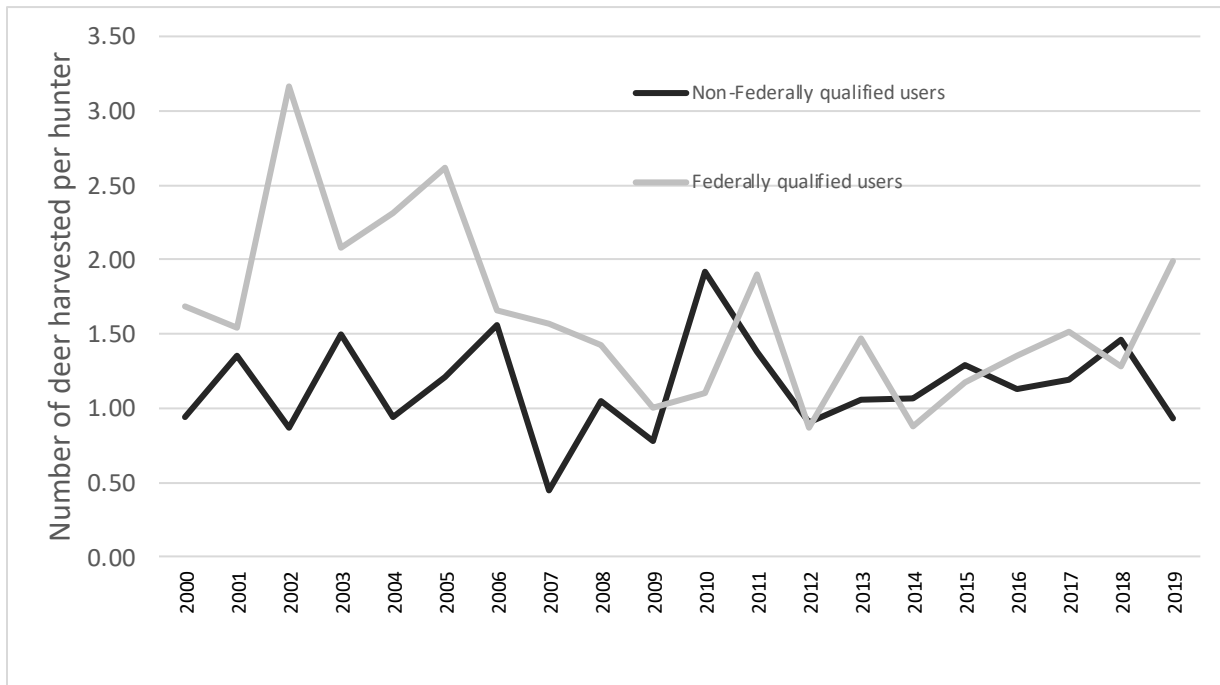


Figure 9. Number of deer harvested per hunter by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.

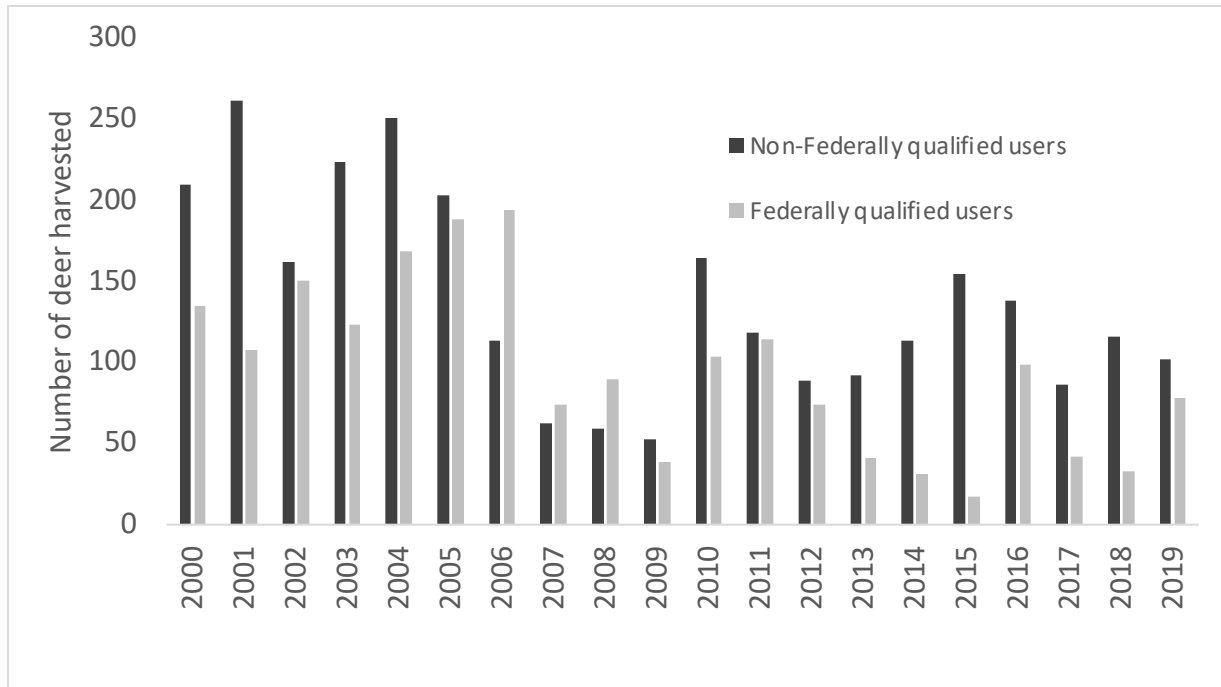


Figure 10. Number of deer harvested by Federally qualified and non-Federally qualified users in the proposal area, 2000-2019.

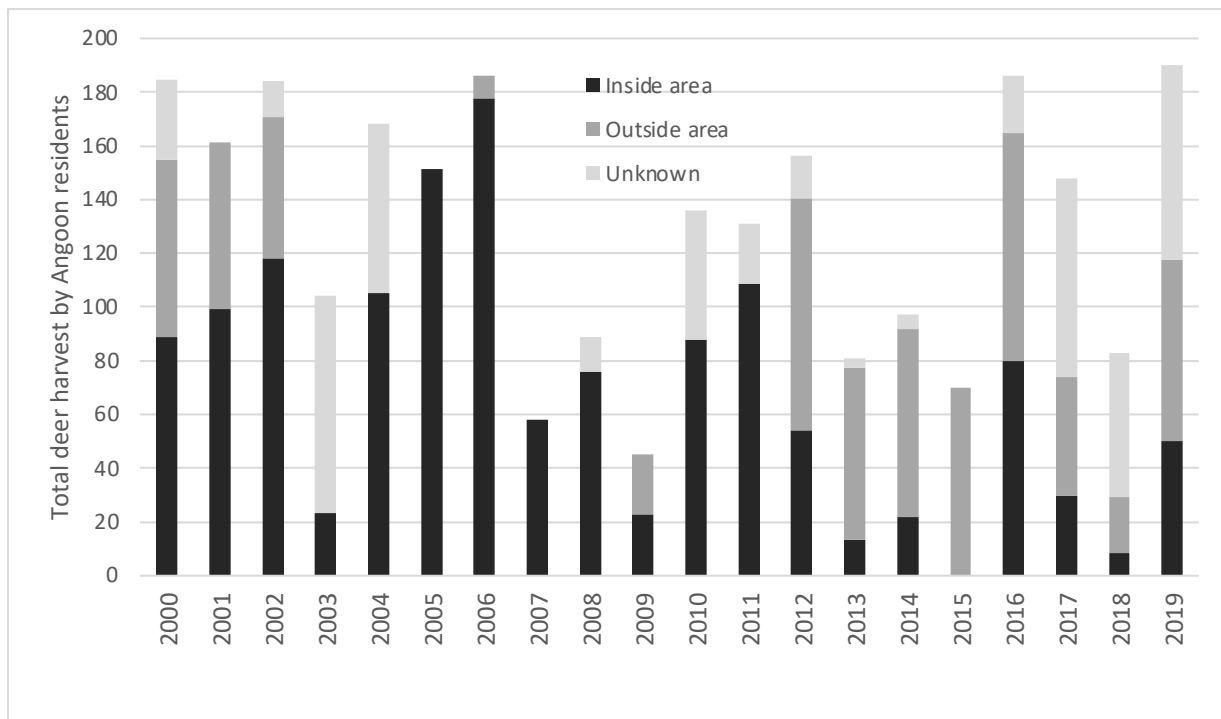


Figure 11. Total number of deer harvested by Angoon residents, by harvest location, 2000-2019.

Table 1. Percentage of Unit 4 deer harvest by month and user type, 2000-2019.

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

Other Alternatives Considered

A reduction of the bag limit for non-Federally qualified users in the proposal area would reduce harvest and may reduce competition between non-Federally qualified and Federally qualified subsistence users. However, relatively few hunters harvest the full bag limit, and with high deer abundance a bag limit reduction would likely have a negligible effect on the success rate of Federally qualified subsistence users and may represent an unnecessary restriction on non-Federally qualified users, which is contrary to Title VIII of ANILCA.

Another alternative is to reduce the extent of the closure area. Reducing the closed area to the Angoon Area WAA (roughly the Mitchell Bay drainages) would displace fewer non-Federally qualified users while still reducing competition between user groups in Angoon's most heavily used deer hunting area. However, even with a reduced area, the proposal may not meet the criteria for a closure to non-subsistence uses under ANILCA Section 815(3). Deer populations in the area are healthy, and there is little evidence that Federally qualified subsistence users are having trouble meeting their needs for deer.

Effects of the Proposal

This proposal would restrict non-Federally qualified users hunting deer on portions of Admiralty Island during the months of peak effort and harvest. Currently, non-Federally qualified users represent roughly 60-70% of the hunting effort and harvest in the proposal area, which is comprised almost entirely of Federal public lands. The proposed September 15 - November 30 closure for non-Federally qualified users would likely eliminate over half of the hunter effort and harvest of deer in the proposal area. Non-Federally qualified users would likely shift their effort to other areas of Unit 4, leading to increased competition with hunters in these other areas. It could also lead to increased effort in the proposal area during the month of December, after the closed period has ended.

The intent of the proposal is to increase opportunity for Federally qualified subsistence users by limiting competition from non-Federally qualified users. However, there is little evidence that the proposed regulation would provide much benefit for Federally qualified subsistence users. Deer populations within the proposal area appear to be healthy and close to carrying capacity and, therefore, the elimination of a substantial portion of the harvest is unlikely to result in a significant increase in the deer population. In addition, if a population increase did occur it could result in the population exceeding its carrying capacity, especially on winter range during years with severe winters, which could negatively affect future Federal subsistence harvest opportunity.

While the proponent states that subsistence users have had trouble meeting their deer needs due to increased competition from non-Federally qualified users, the effort levels, success rates, and total harvest for all hunters in the proposal area have been stable. The harvest data does not indicate any recent

increase in the amount of hunting effort or harvest by non-Federally qualified users, at least over the time period for which data is available. It also shows that within the proposal area, the number of days required to harvest a deer and the number of deer harvested per Federally qualified subsistence user have been fairly consistent for over a decade.

Since there does not appear to be any significant change in the deer harvest and hunting effort by Federally qualified subsistence users in the proposal area, and deer populations in the area are healthy, competition from non-Federally qualified users does not appear to have reduced subsistence uses of deer in the proposal area. However, the perception that Federally qualified subsistence users are experiencing more competition may stem from increases in encountering other hunters, or other user conflicts that are not captured in harvest and effort data. The proposed regulation would reduce the number of such conflicts.

The proposal may also have the unintended consequence of preventing non-Federally qualified users with local ties to the area from participating in subsistence activities. Many people from Angoon and other rural areas move to Juneau to seek employment but return to these communities to participate in subsistence harvesting with family and friends. Under the proposed regulation, these users would be prevented from hunting deer in the area during the closed season.

OSM CONCLUSION

Oppose Proposal WP22-07

Justification

Section 802(2) of ANILCA requires that subsistence uses by rural residents of Alaska shall be “the priority consumptive uses of all such resources on the public lands of Alaska.” Section 804 provides a preference for subsistence uses, specifically “. . .the taking on public lands of fish and wildlife for nonwasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes.” Section 815(3) provides that the Board may restrict non-subsistence uses on Federal public lands if “necessary for the conservation of healthy populations of fish and wildlife” or “to continue subsistence uses of such populations.”

Based on available data, hunting effort and harvest success rates of subsistence users have been stable and favorable over the last 20+ years, suggesting that the closure is not necessary to continue the subsistence uses of the deer population. Deer populations within the area are healthy and there is no conservation concern for deer on the west coast of Admiralty Island, indicating a closure is not necessary for conservation reasons. Thus, the proposed regulation does not meet the criteria identified in Section 815(3) of ANILCA for a closure or restriction of non-subsistence uses.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Southeast Alaska Subsistence Regional Advisory Council

Support WP22-07 with modification to remove wildlife analyses areas 4044 and 4043 from the proposed closure area.

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

Unit 4 - Deer

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

Drainages of Admiralty Island flowing into Chatham Strait between Fishery Point and Point Gardner, except drainages flowing into Thayer Lake, Hasselborg Lake, and Hasselborg Creek are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users.

Harvest data have shown a decline in deer harvest by subsistence users, and the local Council member testified that Angoon residents are having a hard time getting deer. The decrease in competition from other non-Federally qualified users will be beneficial to subsistence users. The proposed closure is not necessary for conservation purposes, but it will be necessary to ensure continued subsistence uses by residents of Angoon whose harvest levels have fallen in recent years. The Council found that the proposal is consistent with established fish and wildlife management principles in that it uses a change in hunting seasons for some users as a tool.

The Council removed sections from the originally proposed closure area that had the highest rates of use by non-Federally qualified users. The intent of the modification was to reduce the impact of the closure on those users. The Council acknowledged that wildlife analysis areas could not be used in Federal regulation and requested that OSM develop modified regulatory language to reflect the Council's intent. The original and modified closure areas are shown in **Figure 12**.



Figure 12. The original (within black outline) and modified (with cross-hatching) proposed closure area.

INTERAGENCY STAFF COMMITTEE COMMENTS

The ISC acknowledges the extensive discussion by the Council members about the closure policy application to this situation. This was one of four proposals for Unit 4, which overall has a healthy population of deer, but is experiencing subareas where subsistence users are not able to harvest enough deer for their needs. The Council submitted this proposal because of concerns brought to them by the affected Federally qualified subsistence users in Angoon about not meeting subsistence needs for deer. The proposal review process allowed them to review the available data and hear testimony from all affected users of the resources. During the meeting, they acknowledged that the data in the State reporting system used to measure effort does not reflect success in subsistence hunting because subsistence hunting of deer is opportunistic and users generally only report when they are successful. They crafted a modification in area and season that limits the impacts to the non-Federally qualified users and addresses the needs of subsistence users.

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

Wildlife Proposal 22-07

This proposal would close federal public land draining into Chatham Strait between Point Marsden and Point Gardner to deer hunting by non-federally qualified users (NFQU) from September 15 – November 30 (**Figure 1**). Federally qualified users (FQU) could continue to hunt in this area August 1 through January 31.



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

Background

The Southeast Alaska Subsistence Regional Advisory Council (SERAC) claims that NFQUs are unfairly competing with FQUs when hunting Sitka black-tailed deer and seeks to change the federal hunting regulations in Game Management Unit (GMU) 4.

GMU 4 encompasses the ABC Islands (Admiralty, Baranof, and Chichagof) and the surrounding archipelago. Hunters residing in Southeast Alaska (GMUs 1-5) excluding Juneau and Ketchikan are eligible to harvest deer in GMU 4 under federal subsistence regulations. The current federal deer season for this area is August 1 to January 31 with a bag limit of 6 deer (bucks only August 1 – September 14). The current State season is August 1 to December 31 with a bag limit of 6 deer (bucks only August 1 – September 14). In 2019, the Alaska Board of Game (BOG) increased the deer bag limit in GMU 4 from 4 to 6 deer because there is such a healthy population of deer within this GMU.

The BOG has made a positive customary and traditional use finding for deer in GMU 4 and established an annual amount reasonably necessary for subsistence (ANS) for deer in GMU 4 of 5,200-6,000 deer. ANS differs from the undefined term “subsistence need” used in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Under Alaska law ANS is the harvestable portion of a game population that is sufficient to provide a reasonable opportunity for subsistence uses. “Reasonable

opportunity” is that which allows a normally diligent hunter a reasonable expectation of success. The BOG establishes an ANS for a game population through review of long-term population and harvest information. A portion of the state-designated Juneau Nonsubsistence Area extends into GMU 4 on northern and eastern Admiralty Island.

The indices of deer abundance, deer hunter effort, and harvest in GMU 4 are all important aspects to consider when reviewing the validity of this proposal. Deer abundance trends are derived from annual deer pellet group transects, aerial alpine surveys, and spring mortality surveys. Hunter effort and harvest are derived from the annual deer hunter survey (1997-2010), and mandatory deer harvest ticket reports (2011 - present). Collectively, these data gathered by the Alaska Department of Fish & Game (ADF&G) are the only annually collected, objective, and quantitative information on deer abundance, hunter effort, and harvest available for Southeast Alaska.

GMU 4-Wide Population and Harvest

Monitoring deer abundance in forested habitat is challenging as deer cannot be directly counted through ground or aerial surveys, so we currently look at several types of survey data. Since the 1980s ADF&G has used spring pellet group counts to monitor broad (>30%) changes in deer abundance. Spring pellet group surveys are conducted in numerous US Forest Service Value Comparison Units across Southeast Alaska after snow melts and before spring green-up.

GMU 4 consistently has the highest pellet group counts in Southeast Alaska (**Figure 2**). Pellet group counts <1.0 group/plot generally correspond to low density populations, 1.0 – 1.99 group/plot to moderately dense populations and > 2.0 group/plot correspond to high density populations. Pellet group counts in GMU 4 are usually well above the high-density threshold and are often double the counts in other GMUs. Although the specific area affected by this proposal is rarely sampled, this broad index of deer abundance suggests the GMU 4 population remains at high levels with no indication of depleted populations or conservation concerns.

In 2013, ADF&G began evaluating mid-summer aerial counts of deer in alpine habitat as an index of deer abundance. Surveys were conducted for 2 locations in GMU 4, Southern Admiralty Island (2015-2017) and Northeast Chichagof Island (2017-2018). The findings of those surveys were summarized as deer counted per hour of survey time (**Figure 3**). Southern Admiralty had the highest deer/hour of any survey area in Southeast Alaska. Estimates from Northeast Chichagof were similar to Prince of Wales Island (POW) and higher than all other survey areas except Southern Admiralty and POW.

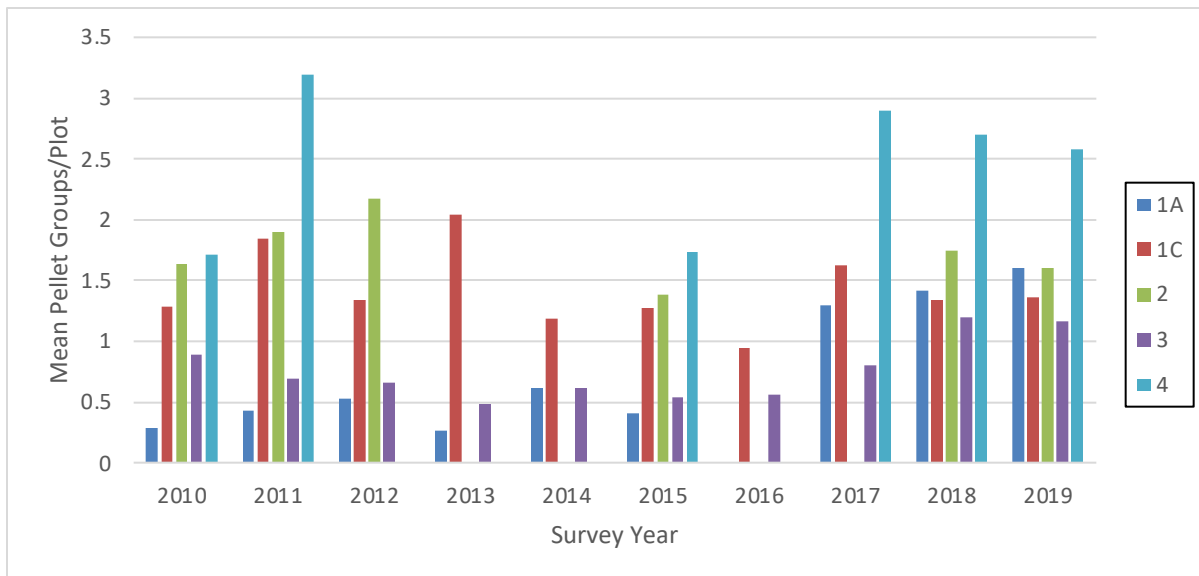


Figure 2. Mean number of deer pellet groups/plot for Southeast Alaska by GMU, 2010-2019.

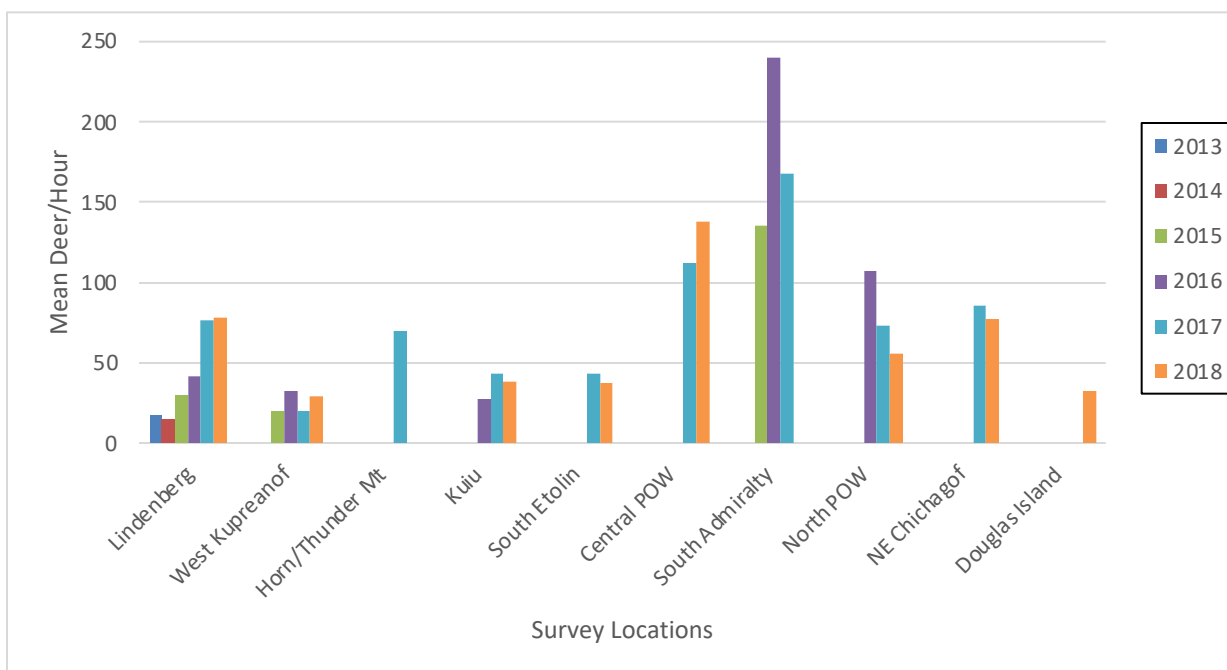


Figure 3. Mean number of deer counted per hour during mid-summer aerial alpine deer surveys in Southeast Alaska, 2013-2018.

Management biologists in GMU 4 began conducting beach mortality transects in the early 1990s. Although these mortality surveys are a relatively insensitive indicator of population trend, they are an indicator of mortality resulting from severe winters which is the most limiting factor for Sitka black-tailed deer populations in GMU 4. In addition to the total count of carcasses per mile, the proportion of adult male, adult female and fawn mortalities also indicates winter severity. Usually fawns die first, followed by adult males and then adult females. The winter of 2006/2007 was the most severe on record, and in some parts of GMU 4 managers estimated up to 75% of deer died. Note the very high number of carcasses

found during spring 2007 surveys (**Figure 4**). In the years since then, few carcasses were found indicating high overwinter survival and no winter related population declines.

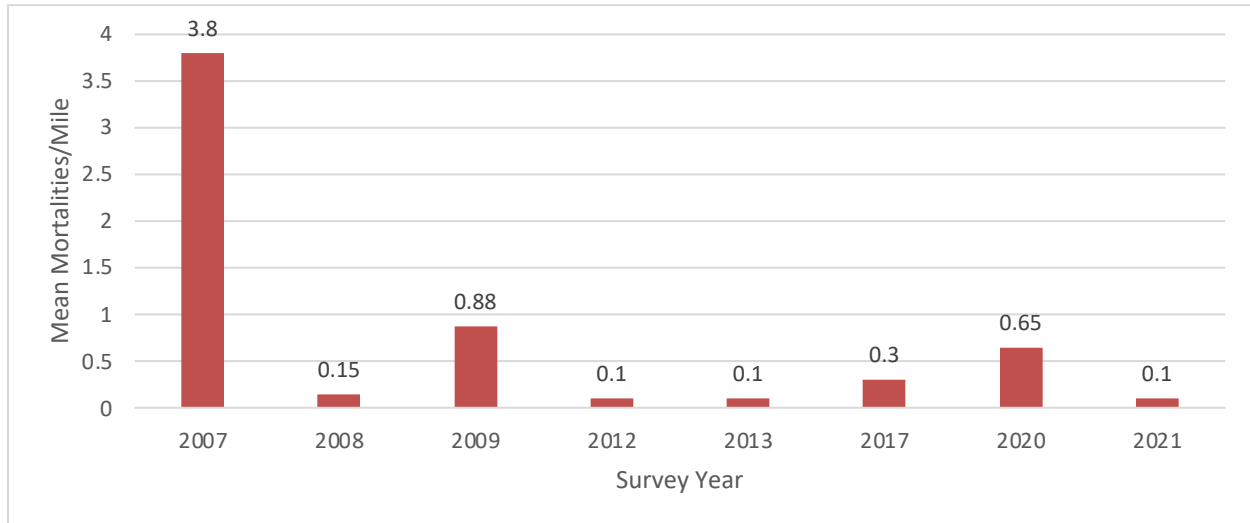


Figure 4. Mean number of mortalities per mile of beach surveyed in GMU 4.

Taken together, these indices of deer abundance (pellet group surveys, alpine counts, mortality transects) suggest the GMU 4 deer population is high and stable. None of these indices suggests a decline in deer abundance or a conservation concern for the GMU 4 deer population.

Hunter Effort and Harvest

GMU 4 managers also use harvest as an indicator of trend in the deer population. ADF&G estimates hunter effort and harvest using information provided by hunters. To hunt deer in Southeast Alaska all hunters must obtain harvest tickets. Prior to 2011 ADF&G mailed survey forms to one third of the hunters in each community who obtained harvest tickets. Since 2011 harvest tickets have come with a mandatory reporting requirement. People who obtain harvest tickets are required to report whether they (or a proxy or federal designated hunter) hunted or not. Those who did hunt are required to report where they hunted, days of hunting effort, and information about deer they harvested.

Since 1997 the estimated average annual harvest in GMU 4 has been 5,643 deer taken by 3,275 hunters (**Figure 5**). Currently, GMU 4 supports the highest deer harvest in the state with harvest remaining fairly stable with between 5,000-7,000 deer harvested annually. The exception being the severe winter of 2006/2007 when high harvest was followed by significant overwinter mortality of deer throughout GMU 4. This resulted in a precipitous decline in harvest from 7,734 deer in 2006 to 1,933 deer in 2007. Based on harvest and other indicators of deer abundance, managers believe the deer population had fully recovered by the 2013 season.

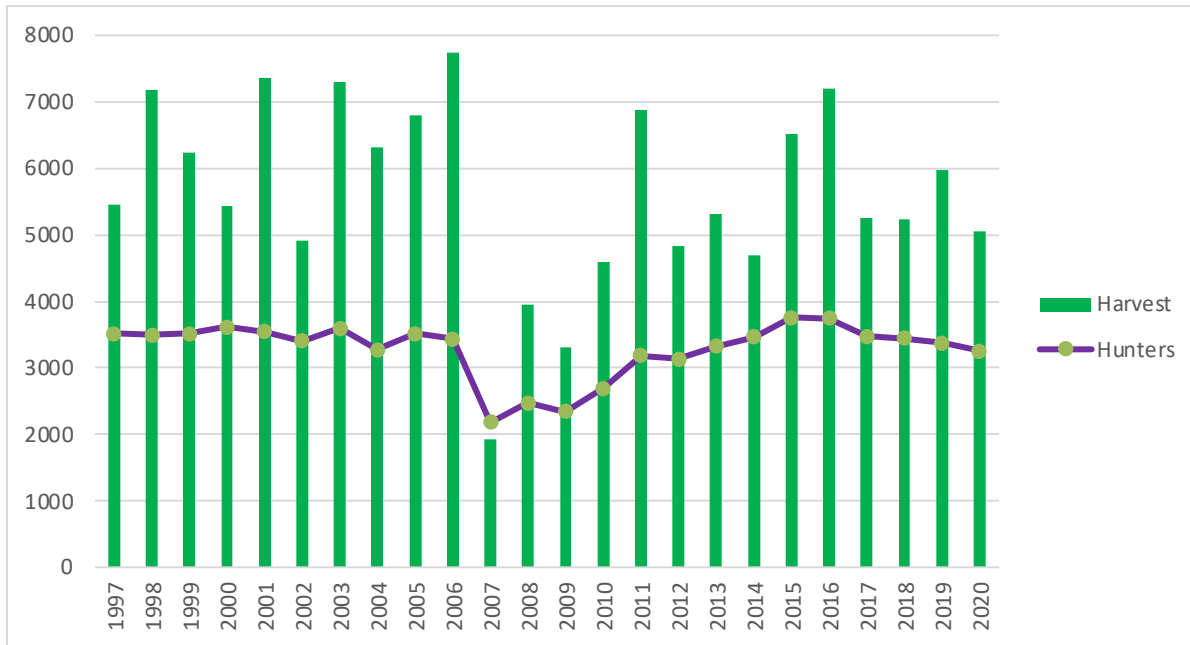


Figure 5. Numbers of people hunting deer and estimated deer harvest for GMU 4, RY97-RY20.

Data Summaries for the Impacted Area

The following analyses present data summarized for FQUs and NFQUs in the 6 ADF&G Wildlife Analysis Areas (WAAs 4041-4044, 4054 and 4055) that intersect with the area this proposal covers (Figure 1). WAA boundaries generally correspond with watersheds and are the finest scale at which data can be meaningfully summarized. For this proposal, WAA boundaries directly correspond to the proposal area.

Long-term records indicate a declining trend in harvest for both FQUs and NFQUs (**Figure 6**). From 1997 to 2006, FQUs harvested on average 157 deer annually. Harvest declined with the severe winter of 2006/2007. Since 2013, when ADF&G considered the deer population recovered, FQUs have harvested an average of 56 deer annually. This represents an approximate 65% decline. There is a similar pattern for NFQUs, who averaged 200 deer annually from RY97 to RY06. Since RY13, that average has declined to 119 deer annually.

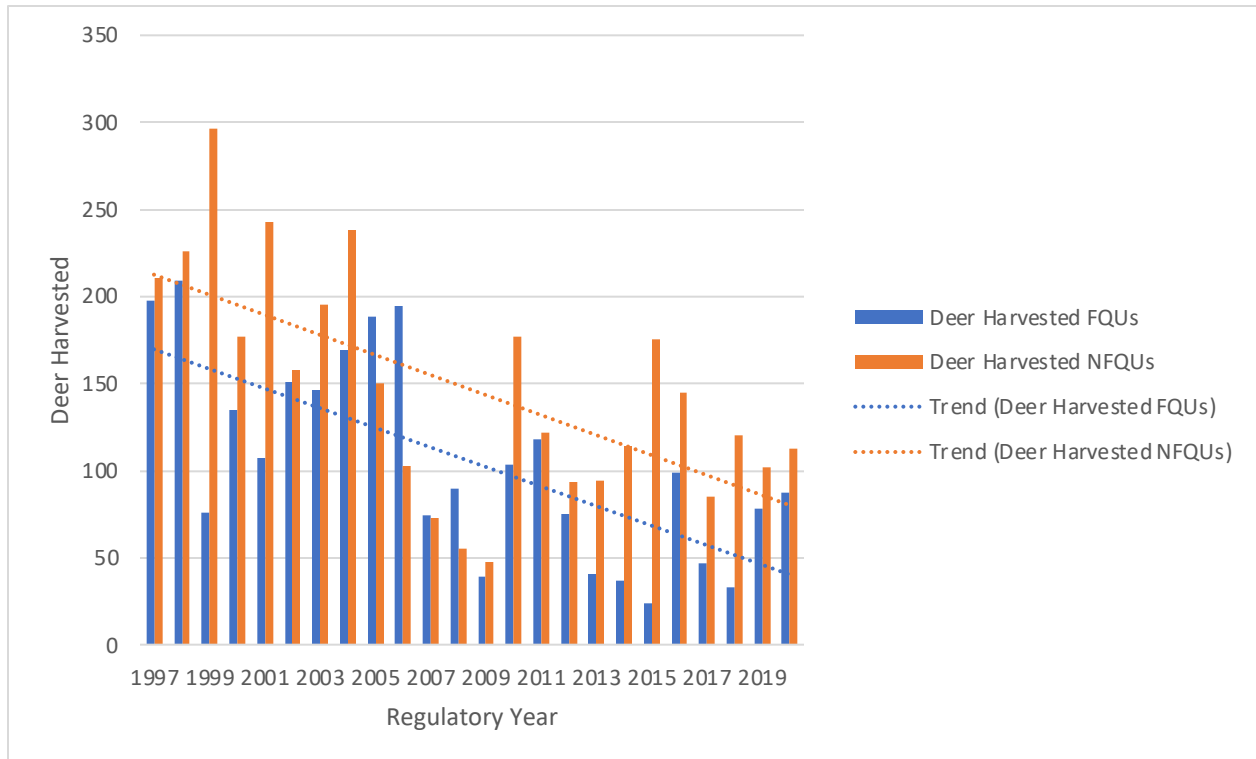


Figure 6. Trends of estimated deer harvest by FQU and NFQUs, western Admiralty Island, RY97-RY20.

To evaluate potential reasons for the decline in deer harvest we examined trends in the numbers of FQU and NFQU hunters and days of hunting effort by those hunters. Since 1997, the number of FQUs and NFQUs have both declined (Figure 7). From 1997-2006 the number of FQUs averaged 72 hunters and NFQUs averaged 143 hunters. The severe winter of 2006/2007 resulted in a decline in the deer population and hunting activity for several years. By 2013 ADF&G considered the deer population recovered. From 2013-2020 the numbers of FQUs averaged only 37 hunters, a decline of approximately 50 percent. For that same period the number of NFQUs averaged 101 hunters, a decline of 30 percent.

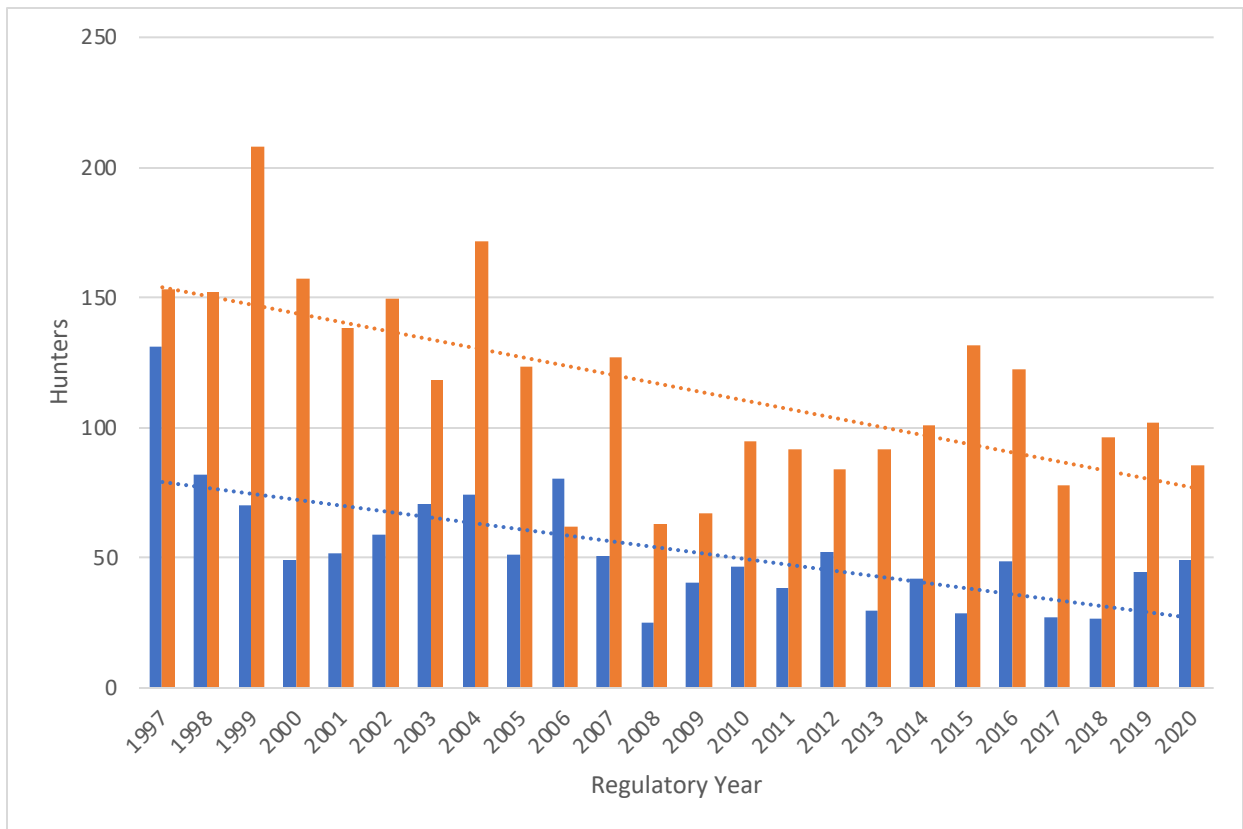


Figure 7. Trends in number of FQUs and NFQUs, western Admiralty Island, RY97-RY19.

In Angoon specifically, there has been an approximate 25% declining trend in the number of Angoon residents who have obtained deer harvest tickets (**Figure 8**).

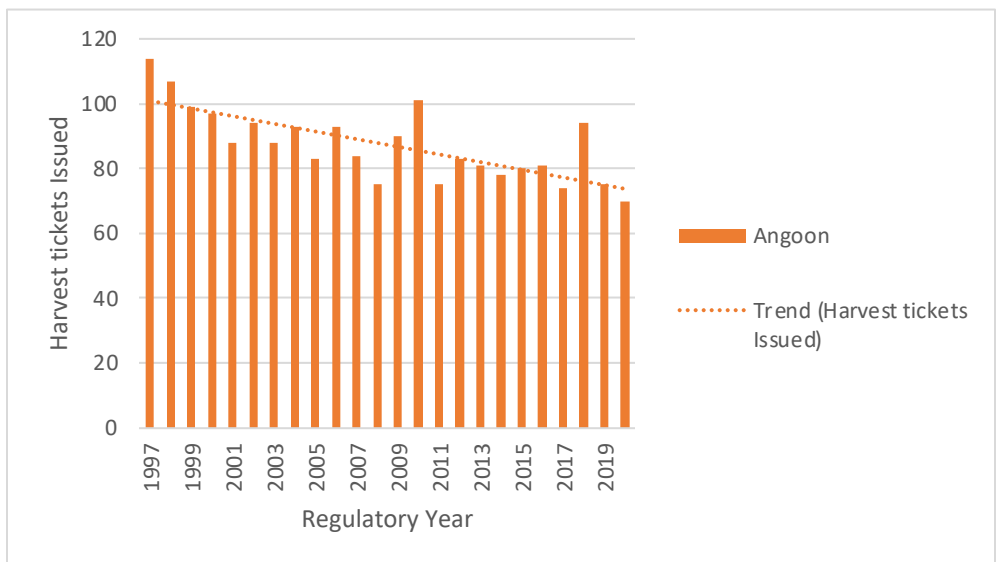


Figure 8. Deer Harvest Tickets Issued in Angoon RY97-RY20

Trends in days hunted are similar to trends for number of FQUs and NFQUs (**Figure 9**). Days of hunting effort by FQUs and NFQUs both declined, but the decline for FQUs has been greater. FQUs spent as

many as 630 days afield in RY97 and as few as 39 days in RY15. Decreasing numbers of hunters and days hunted indicate reduced effort for both NFQU and FQUs for this area of GMU 4.

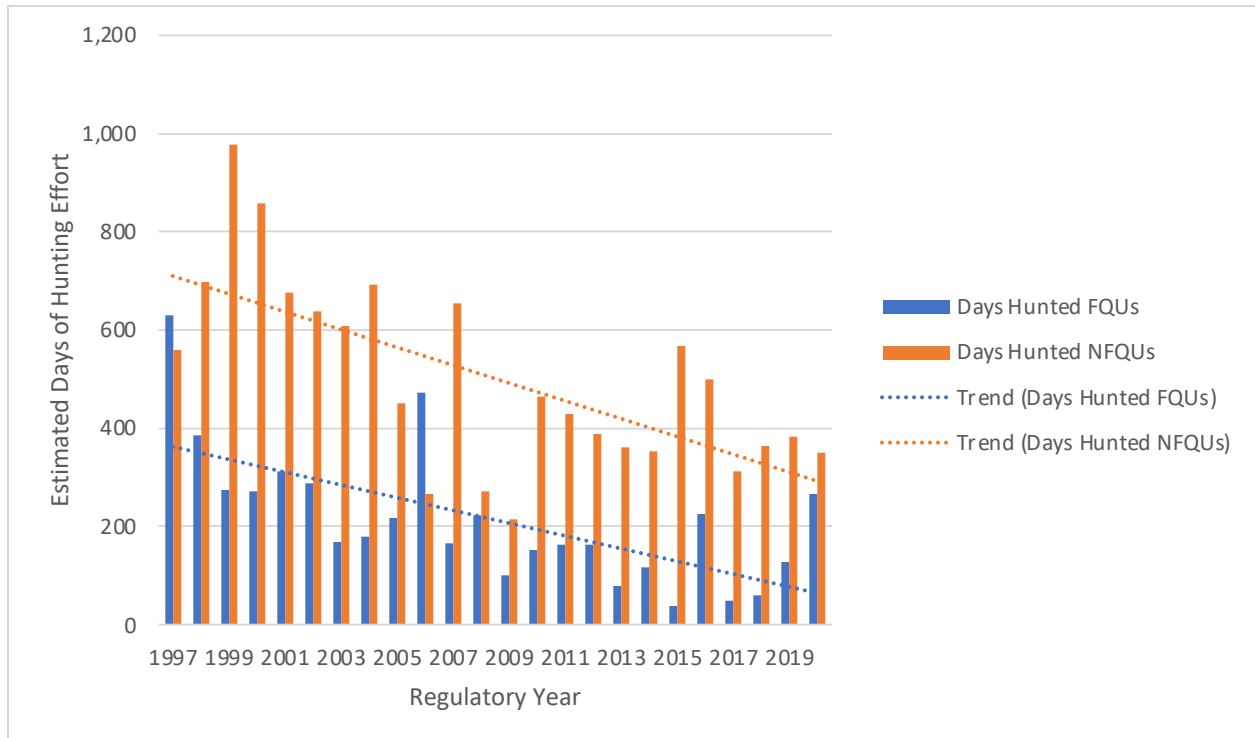


Figure 9. Trends in estimated days of hunting effort by FQUs and NFQUs, western Admiralty Island, RY97-RY20.

Trends in Hunter Efficiency

Hunter efficiency, or the days of hunting effort required to harvest 1 deer, is another indicator of the availability of deer to GMU 4 hunters. FQUs are consistently more efficient than NFQUs in time it takes to harvest a deer (**Figure 10**). Since 1997 FQUs hunting in the proposal area have required an average of only 2.0 days of hunting effort to harvest 1 deer, whereas NFQUs have required 3.4 days of effort.

Deer hunting in GMU 4 is extremely efficient compared to deer hunter effort required to harvest a deer elsewhere in the state. In comparison, hunters on Prince of Wales Island (GMU 2) average 4.0 days of hunting per deer harvested, Kodiak (GMU 8) averages 3.6 days/deer, GMU 1A (Ketchikan) averages 5.0 days/deer, GMU 3 (Petersburg/Wrangell) averages 6.1 days/deer, GMU 6 (Prince William Sound) averages 3.0 days/deer and in GMU 1C (Juneau) hunters average 7.9 days/deer (ADF&G 2013-2020). The effort required to harvest one deer in GMU 4 (2.4 days/deer) is lower than anywhere in Alaska.

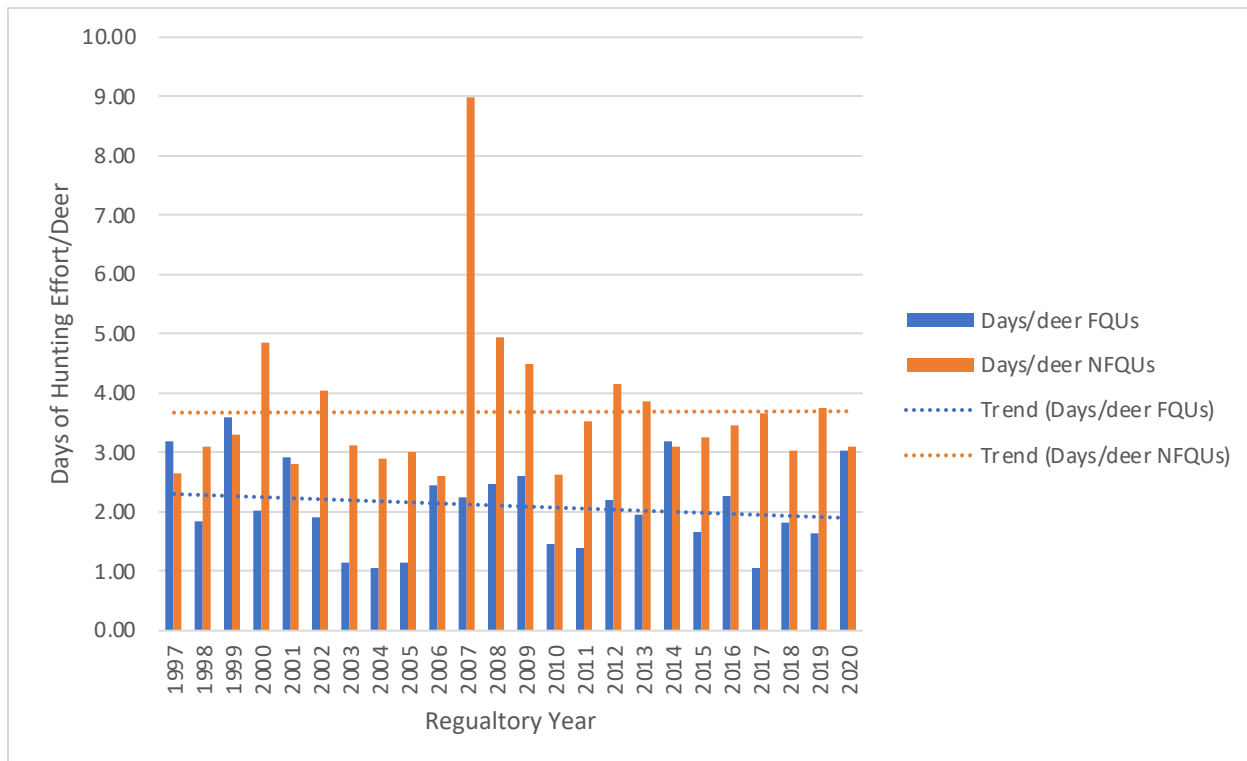


Figure 10. Trends in estimated days of hunting effort required by FQUs and NFQUs to harvest one deer, western Admiralty Island, RY97-RY20.

The number of deer harvested per hunter is another gauge of deer abundance and hunting success. Over the long term this metric has declined for both groups of hunters with the decline for FQUs greater than for NFQUs. However, since RY13 when ADF&G considered the deer population recovered from the severe winter of 2006/2007, the number of deer harvested per NFQU has remained steady and averaged about 1.25 deer/hunter. In contrast, the number of deer harvested per FQUs has trended upwards suggesting that FQUs are experiencing increasing success (**Figure 11**).

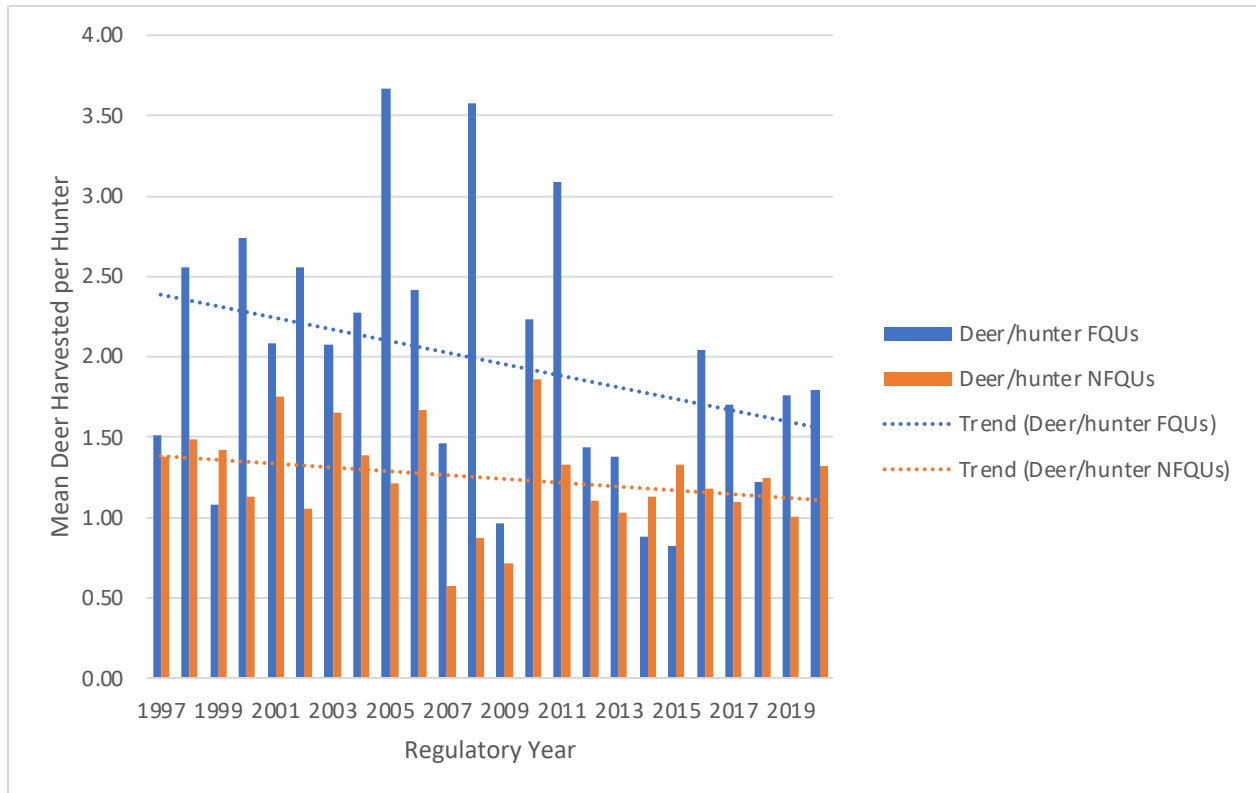


Figure 11. Trends in mean numbers of deer harvested per FQU and NFQU hunters, western Admiralty Island, RY97-RY20.

Hunt Chronology

Mid-October through November is the most popular time for all hunters to pursue deer in GMU 4. Deer activity coinciding with the rut as well as winter snows that push deer to beaches make for more successful hunting than earlier in the season. Hunters report hunting effort and harvest by month, so data can only be summarized by month. The period, September – November, encompasses 64% of hunters, 67% of days hunted, and 64% of the harvest for FQUs hunting in Unit 4. Figures for NFQUs are slightly higher at 70%, 76% and 72% respectively (Table 1).

Table 1. Unit 4 Deer Hunting Chronology of Harvest and Effort for FQUs and NFQUs as both numbers and percent-age of total.

FQUs RY11-RY20						
Month	Hunters	%	Days Hunted	%	Deer Harvested	%
August	2,405	8	4,081	6	2,124	6
September	2,741	10	4,961	8	2,672	8
October	4,686	17	9,677	15	4,991	14
November	10,480	37	28,035	44	14,641	42
December	5,807	21	12,840	20	7,821	22
January	2,149	7	4,050	6	2,992	8
Total	28,268		63,644		35,241	

NFQUs RY11-RY20						
Month	Hunters	%	Days Hunted	%	Deer Harvested	%
August	1,763	8	3,694	5	1,220	6
September	1,763	8	4,651	7	1,565	7
October	3,529	16	9,475	14	2,599	12
November	10,256	46	38,204	55	11,350	53
December	5,005	22	13,268	19	4,503	21
Total	22,316		69,292		21,237	

Analysis

The analyses presented here are based on several different metrics that came from the only annually collected, objective, and quantitative information available on deer abundance, hunter effort and harvest in the area affected by this proposal. Deer abundance data is not only gathered by ADF&G, but hunters report their effort and harvest to ADF&G, including the local residents of Angoon.

The proposal asserts that the deer population on western Admiralty Island is “depleted” and that in recent years FQUs have had difficulty meeting their subsistence needs for deer because of increasing competition with NFQUs. Because the term “subsistence need” is not defined and ANILCA does not require the federal program to quantify historical levels of harvest for subsistence uses, there is no way to objectively verify when those needs are being met. Our analysis focuses on measures of deer abundance and trend in GMU 4 and on trends in effort and harvest by FQUs and NFQUs in the proposal area. Conditions that would support the assertion that NFQUs are hindering deer harvest by FQUs would include increasing numbers of hunters, days of hunting effort, and harvest by NFQUs that coincide with declining harvest by FQUs while numbers and effort by FQU hunters remained stable or increased.

ADF&G monitors abundance and trend of deer at the scale of the GMU or subunit, so we can only note that the available data indicate GMU 4 deer populations are currently at high and stable levels. Winter severity, particularly deep and lingering snowpack, is the biggest limiting factor for Sitka black-tailed deer in GMU 4. The last winter with above average snowfall occurred in 2011/2012. Since then, winters have been average to mild with little overwinter mortality. Pellet group and aerial alpine deer counts also support the conclusion that deer remain abundant throughout GMU 4.

The proposal also asserts that FQUs on western Admiralty Island are having an increasingly difficult time meeting their subsistence needs. The term “subsistence need” as used in Title VIII of ANILCA has no quantitative benchmark analogous to ANS in state regulations. Consequently, there is no way of verifying whether the existing federal regulations are adequately providing for subsistence harvest or not. Because the proposal notes that increasing competition from NFQUs is making subsistence harvest more difficult and because no similar proposal has been submitted before, we can presume that in the past FQUs were able to provide for subsistence uses. Therefore, to evaluate the need for this restriction of NFQU opportunity we investigated harvest and measures of hunter effort for trends of increasing effort and harvest by NFQUs.

We found that the numbers of FQUs and NFQUs hunting deer in this area has declined, but that decline in participation was much greater among FQUs. This decline in hunter participation appears related to the severe winter of 2006/2007. The average number of FQUs hunting deer in this area before RY07 was approximately 50% greater than the average from RY13 to present. We have also seen an historic decline in the number of Angoon residents who received deer harvest tickets. Numbers of NFQUs hunting deer in this area also declined, but by only 30%. Days of hunting effort showed a similar trend. The number of days hunted by FQUs has declined from the 1997-2006 average of 320 days per year to an average of only 121 days per year since 2013, a decrease of 62%. The decline in hunting effort for NFQUs for the same time periods has been approximately 38%. This finding directly contradicts the assertion in the proposal that increasing competition from NFQUs is hindering harvest by FQUs. In fact, total deer hunting effort and the potential for competition between FQUs and NFQUs in this area has substantially declined.

To evaluate whether FQUs are having an increasingly difficult time harvesting deer we looked for trends in the number of days of hunting effort required to harvest 1 deer and number of deer harvested per hunter. Since RY97 days of hunting effort to harvest 1 deer has been stable for NFQUs but is trending slightly downward for FQUs. In recent years FQUs on western Admiralty Island are harvesting fewer deer per hunter than they did prior to 2012. However, since RY13, deer harvested per FQU has been trending upward suggesting FQUs are enjoying increasing success.

If harvesting deer was becoming more difficult for FQUs, we would expect to see an increase in the number of days of hunting effort required to harvest a deer and a decline in the number of deer harvested per FQU hunter. However, these measures of hunter success based on hunt reports provided by FQUs, including residents of Angoon, indicate that deer hunting conditions on western Admiralty Island remain very good and that in recent years FQUs have enjoyed greater hunting success.

Summary

The proposal asserts that the deer population on western Admiralty Island is depleted and that in recent years FQUs have had difficulty meeting their subsistence needs because of increasing competition from NFQUs. Our analysis of the deer population, hunter effort and harvest trends found no support for either contention. Instead, the available indicators support that deer remain abundant throughout GMU 4. On western Admiralty Island it is unlikely that hunter harvest has reduced deer abundance because total hunting effort is relatively light, and over the last 2 decades hunter effort and harvest have declined.

We could find no support for the contention that competition from NFQUs has increased or that NFQUs are hindering harvest by FQUs. In fact, over the past 2 decades, rather than increasing, the number of NFQUs and days of hunting effort by NFQUs has declined. Further, days of hunting effort by FQUs required to harvest a deer remains very low and the number of deer harvested per FQU has been increasing.

Our analysis does indicate a decline in the number of deer harvested by FQUs on western Admiralty Island. However, that decline is attributable to a decline in the number of FQUs and days of effort by those hunters. Over the last 20 years the number of FQUs and days of hunting effort by those hunters has declined by half. Deer remain abundant and competition from NFQUs is stable or declining, so we conclude that the decline in federal subsistence harvest of deer results from a decline in participation and effort by FQUs, not depleted deer populations or increasing competition from NFQUs.

Impact on Subsistence Users

This proposal would result in eliminating some competition in this area between FQUs and NFQUs between September 15 and November 30. However, hunting under state regulations could still occur on state-owned tidelands below mean high tide and private property confusing state and federal subsistence hunters on where they can and cannot hunt.

Impact on Other Users

Opportunity for NFQUs to harvest deer on federal public lands on western Admiralty Island would be severely reduced. Seventy-two percent of the NFQU harvest from this area occurs during the period targeted for closure by this proposal.

Opportunity Provided by the State

The State hunting season and bag limit for deer in GMU 4 including western Admiralty Island is:

Bag Limit 6 deer	Resident Open Season	Nonresident Open Season
(bucks only to Sep 14th)	<i>Aug 1 – Dec 31 (Harvest ticket)</i>	<i>Aug 1 – Dec 31 (Harvest ticket)</i>

Conservation Issues

There are no conservation issues for the deer population in GMU 4. Following 9 consecutive mild winters, the available population indices suggest the GMU 4 deer population remains high and stable. Deer harvest remains within the historical range and state ANS is met in most years. Population indices and measures of hunter effort and success indicate that GMU 4 has the highest population of deer and highest hunting success of anywhere in the state.

Based on the information provided to ADF&G by GMU 4 deer hunters, population indices, anecdotal reports by local hunters and field observations by management biologists we conclude that there is no conservation concern for the GMU 4 deer population.

Enforcement Issues

If this proposal is adopted NFQUs will still be able to hunt deer on state-owned tidelands below the mean high tide line and on private property. The tideline is not marked, so NFQUs and enforcement officers will have difficulty determining when deer are above or below the line of mean high tide.

Position

ADF&G **OPPOSES** this proposal as originally submitted as well as with the changes suggested by the SERAC during their meeting in October 2021. There is no evidence that hunting by NFQUs has negatively affected FQUs overall ability to harvest deer. Adopting this proposal would deprive NFQUs of sustainable deer hunting opportunity contrary to terms laid out in Title VIII of ANILCA. This proposal would also unnecessarily restrict Alaskans, whom many are former residents of the area who have had to move away for a variety of reasons. They would then be put into a situation where they would be restricted in their ability to practice their traditional and cultural way of life.

Approximately 90% of land in GMU 4 is federally managed, and current federal regulations provide greater opportunity to federally qualified deer hunters compared to NFQUs. FQUs are eligible to hunt an entire month longer than NFQUs with a season extending through the month of January as well as a liberal designated hunter program.

As directed by Congress in Section 802 of ANILCA, subsistence uses of wildlife shall be the priority consumptive use on federal public lands “when it is necessary to restrict taking in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such population.” Section 815 of ANILCA provides that a restriction on taking wildlife for non-federally qualified hunters is only authorized if “necessary for the conservation of healthy populations of fish and wildlife, for the reasons in Section 816, to continue subsistence uses of such populations, or pursuant to other applicable law.” Proponents of this proposal, and similar ones that will be considered, interpret these conditions to mean it gives them the right to total exclusivity to an area based on the aesthetics of hunting. They justify the FSB passing this proposal with statements, “Just trying to find a way so people can hunt in peace here” or “... going to a favorite spot and, you know, seeing another boat there. It doesn’t matter whether or not they’re successful hunters or not, it’s just the fact that they’re there alter the way you hunt.” Based on ADF&G’s analysis of the only annually collected, objective, and quantitative data available, none of those conditions apply. There is no conservation concern for the deer population, and the continued subsistence uses of deer are not being impacted by NFQUs.

Data Tables

Table 2. Summary Table Federally Qualified Deer Hunters, WAAs 4041, 4042, 4043, 4044, 4054 and 4055.

Regulatory Year	No. of Hunters	Total Hunt Days	Bucks Harvested	Does Harvested	Total Harvest	Deer per Hunter	Days per Deer
1997	131.1	630.2	138.9	58.8	197.7	1.5	3.2
1998	82	385.9	169.1	40.4	209.5	2.6	1.8
1999	70.2	273.9	52.7	23.4	76.1	1.1	3.6
2000	49.2	271.6	87.5	47.2	134.7	2.7	2.0
2001	51.6	312.4	80.7	26.7	107.5	2.1	2.9
2002	59.1	288.8	85.3	65.6	150.9	2.6	1.9
2003	70.4	167.9	117.8	28.5	146.3	2.1	1.1
2004	74.2	179.2	118.3	50.7	169	2.3	1.1
2005	51.4	216.7	131.7	56.8	188.5	3.7	1.1
2006	80.5	473.5	162.8	31.8	194.5	2.4	2.4
2007	50.7	165.5	54.1	20.1	74.2	1.5	2.2
2008	25.1	221.9	51.8	38	89.8	3.6	2.5
2009	40.3	101.4	33.2	5.8	39	1.0	2.6
2010	46.3	151.3	87.4	16	103.4	2.2	1.5
2011	38.2	162.1	78	39.8	117.8	3.1	1.4
2012	52.1	164.1	59.3	15.7	75	1.4	2.2
2013	29.8	80.4	31.3	9.9	41.1	1.4	2.0
2014	41.9	118.2	26.2	10.8	37	0.9	3.2
2015	28.8	39.2	19.1	4.4	23.6	0.8	1.7
2016	48.5	224.7	77.6	21.3	98.9	2.0	2.3
2017	27.3	48.8	30.2	16.4	46.5	1.7	1.0
2018	26.8	59.8	25.7	7	32.8	1.2	1.8
2019	44.4	128.1	63.2	15	78	1.8	1.6
2020	48.9	265.5	50.5	37.1	87.5	1.8	3.0

Table 3. Summary Table NFQ Deer Hunters, WAAs 4041, 4042, 4043, 4044, 4054 and 4055.

Regulatory Year	No. of Hunters	Total Hunt Days	Bucks Harvested	Does Harvested	Total Harvest	Deer per Hunter	Days per Deer
1997	153.2	558.7	137.8	72.9	210.7	1.4	2.7
1998	152.3	697.9	127.8	98.3	226.2	1.5	3.1
1999	208.2	976.7	179	117.3	296.2	1.4	3.3
2000	157.1	858.1	138.7	38.4	177.1	1.1	4.8
2001	138.5	677.3	168.4	74.1	242.5	1.8	2.8
2002	149.5	637.2	106.7	50.8	157.5	1.1	4.0
2003	118.3	607.9	132.9	62.3	195.2	1.7	3.1
2004	171.5	692	172.2	66.3	238.5	1.4	2.9
2005	123.6	450.7	106.9	43.4	150.3	1.2	3.0
2006	61.8	267.7	51.5	51.5	103	1.7	2.6
2007	126.8	653.2	48.4	24.2	72.6	0.6	9.0
2008	63	271.2	45.4	9.5	54.9	0.9	4.9
2009	67	215.5	33.5	14.4	47.9	0.7	4.5
2010	94.9	464.7	136	40.8	176.7	1.9	2.6
2011	91.7	429.2	92.4	29.7	122	1.3	3.5
2012	84.2	388.4	52.2	41	93.3	1.1	4.2
2013	91.6	362.5	65.8	28.2	94	1.0	3.9
2014	101	354.5	86	28.4	114.4	1.1	3.1
2015	131.5	568.7	132	43.2	175.2	1.3	3.2
2016	122.2	500.4	115.5	29.1	144.6	1.2	3.5
2017	77.8	313.1	56.8	28.7	85.5	1.1	3.7
2018	96.1	364.8	89.1	31	120.1	1.2	3.0
2019	101.9	384.3	81.1	21	102.3	1.0	3.8
2020	85.7	350.4	80.2	32.8	112.9	1.3	3.1

WRITTEN PUBLIC COMMENTS

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Alaska Outdoor Council comments - 2022-2024 Wildlife Proposals

Rod Arno <rodarno@gmail.com>

Mon 7/19/2021 12:23 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: Mulligan, Benjamin J (DFG) <ben.mulligan@alaska.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Alaska Outdoor Council
319 K Street, Suite 200
Anchorage, Alaska 99501
July 19, 2021

RE: Public comments for FSB 2022-2024 Wildlife Proposals

The Alaska Outdoor Council (AOC) is a Statewide coalition of individual members and clubs representing 10,000 Alaskans who hunt, trap, fish and recreate on public lands/waters in Alaska. AOC Club Representatives have participated in the regulatory process of managing and allocating fish and game in Alaska since before statehood in 1959.

Numerous proposals submitted by Federal Subsistence Regional Advisory Councils, federally recognized subsistence communities, and individuals confirm the fears that many AOC Representatives had at the time of the passage of Alaska National Interest Lands Conservation Act (ANILCA) 1980. Dual management of who can harvest game depending on whether you are on state public and private lands or if you are on federal lands was not the intent of Congress when they passed ANILCA.

AOC opposes WP22-07, WP22-08, WP22-09.
Alaska Department of Fish & Game data should not invoke a complete closure to non-Federally Qualified Subsistence Users under Section 804 of ANILCA. Even the 9th Circuit Court, *Nisutalik Traditional Council v. U.S.*, 227 F.3d 1186 in 2000 understood the priority given in Title VIII of ANILCA was not absolute.

AOC opposes WP22-15.
Congress's findings and declaration in Sec. 801 of ANILCA should leave no room for regulatory action by the Federal Subsistence Board (FSB) regarding anti-trapper claims. Sec. 801(3) of ANILCA should have the FSB concentrating only on "remote federal lands", as was the intent of Congress when they passed 802(2) of ANILCA.

AOC opposes WP22-16 thru 22.
Providing a priority for some individuals or communities to harvest game on federal public lands located on the Kenai Peninsula only exacerbates the conflict between federally qualified hunters and Alaskans living in non-federally qualified areas of the state. Both groups of hunters are similarly situated.

AOC opposes WP22-32.
It would be in Alaskan's best interest if the FSB would reduce the number of Alaskans allowed a priority to harvest game on federal lands just based solely on where they live, not how.

Thanks for the opportunity to provide public comments.

Rod Arno, Public Policy Director
Alaska Outdoor Council

Sent from Rod Arno's iPad.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RhLWVOTgNDQ1O8D4YjQxLWE0YzY0NW13MDNjZQAGAL9k...> 1/1

To Whom It May Concern,

I am writing today thankful for the opportunity to voice my opinion regarding the following proposals.

WP22-07 - To exclude hunting privileges in this region to Juneau residents who depend solely on deer meat to survive is simply outrageous. Angoon hunters DO NOT hunt anywhere remotely close to Hawk Inlet and have the benefit of hunting more productive and safer waterways near town. (Mitchell Bay) Where Juneau residents even on a good weather day cannot reach. It will confine hunting areas to Juneau residents which will increase pressure on already overcrowded areas furthermore helping to create unsafe scenarios. It is discriminatory, unethical, and does not show good land management for the "American people" rather it divides and polarizes Alaskans in the region.

WP22-08 – I hope this is not a biased proposal toward Juneau hunters and is actually based on science relating to current deer populations. How did we go from 6 to 2? Snow and ice lead to winter die off which effects overall deer populations not hunters.

WP22-09 - Rural hunters outside of Juneau already have the benefit of a longer harvest period. Just because our jobs and lives are based in Juneau does not mean we want the high cost of inferior meat from Costco.

In closing please do not take away these beautiful places to Juneau residents limiting our access to the outdoors, feeding our families, and the social benefits hunting brings us.

Thank you


Adam S. Anderson

Mike Bethers
P.O. Box 210003
Auke Bay, AK 99821
(907)-321-1186
mikebethers@gmail.com

June 22, 2021

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

Re: Wildlife Proposals 22-07, 22-08, and 22-09

Dear Mr. Matuskowitz:

Please include these comments in the public record. Please give a copy to each board member.

Subsistence deer hunters (Federally Qualified Users or FQUs) from Angoon, Hoonah and Pelican are claiming that non-subsistence deer hunters (Non-Federally Qualified Users or NFQUs) are out competing them for blacktail deer. Village residents are federally qualified and already have priority use of the deer resource as their season runs through January 31, while the NFQU season ends December 31.

The Southeast Alaska Subsistence Regional Advisory Council has developed three wildlife proposals – 22-07 Angoon, 22-08 Hoonah, and 22-09 Pelican – to address claims that NFQUs are responsible for reduced subsistence harvests in these villages. These proposals are based only on comments from villagers and are not based on any actual data or documented observations.

Based on my personal observations made deer hunting in Northern Southeast Alaska over the last fifty years and findings of the Alaska Department of Fish and Game (ADF&G) harvest studies, these proposals can not be justified in any way and should not be adopted.

I have been a lifelong deer hunter and am over seventy years old. The last several years I've spent more than fifty days in the woods annually, and for the last fifty years, my hunting has been in Northern Southeast Alaska; I've hunted in all areas included in these proposals. I can still get up the mountain farther than I can get a big buck out of the woods and am very selective of what I harvest and where. I use a boat to access my hunting areas and do a lot of calling and don't hunt from drivable roads. I haven't been on the Hoonah road system in decades. Every year I let many deer walk away rather than shoot them and have absolutely no problem getting enough deer to meet my family's needs.

Theo Matuskowitz

June 22, 2021

Page 2

Following are comments that apply to all three proposals (22-07, 22-08, and 22-09)

NFQUs already have priority to deer as they can hunt through January when deer are often most available while NFQU's season ends December 31.

The winter of 2007-2008 saw a record high snowfall throughout Northern Southeast Alaska and as a consequence, deer were driven to the beach in numbers not seen since. They were at the peak of availability. Since the winter of 2007-2008 there has been less snowfall and deer have not hit the beach in numbers seen during the 2007-2008 winter. In the last three to four years there has been less snow and more rain. Deer have not herded up on the beach much and it has been more miserable to hunt in the rain but hunters I associate with, that like to hunt and eat venison, were out there hunting.

In the areas I've hunted the last ten years, I have seen fewer hunters than in earlier years.

Since the deer killing winter of 2007-2008, the deer populations in all three areas have rebounded and currently are at or near all time highs.

Comments on 22-07 Admiralty

This proposal would essentially close federal lands from Pt. Marsden to Pt. Gardener to deer hunting by NFQUs from September 15 through November 30.

Most NFQUs from Juneau who hunt the West side of Admiralty usually turn around at Funter Bay or Hawk Inlet as there are few to no good anchorages south of Pt. Marsden. Also, the proposed closed area is too far from Juneau for day trips. It is my belief that most subsistence hunting from Angoon is done on the beaches, which are not included in this proposal as beaches are state land.

I know several NFQU hunting parties that hunt West Admiralty, mostly north of Pt. Marsden, and they are typically quite successful. I know of two parties of NFQUs that hunt out of Angoon and they always get their deer.

Comments on 22-08 Hoonah

Hoonah has really degraded local wildlife habitat through extensive clear-cut logging (which has been shown to significantly impact wildlife values over the long period) and the extensive road system (which has been shown to also reduce the area's wildlife values). The Hoonah road system has become a favorite place to conduct hunting by Hoonah residents, especially after doe season opens. Please note that reduced sailing schedules of the Alaska Marine Highway's ferries have reduced opportunity for NFQUs from Juneau to get to Hoonah to compete with local hunters.

Over the years, deer have adjusted to the heavy hunting pressure along the Hoonah road system. After a week or two of harassment by road hunters, surviving animals move away from the roadside. However, I know those that hunt in the woods accessed by the Hoonah road system have had no problem finding deer.

Theo Matuskowitz

June 22, 2021

Page 3

I have heard of two Hoonah residents who in the past typically shot many more deer than the limit, which would take deer away from other hunters.

Also please note that data shows there is minimal exchange of deer between the north shore of Tenakee Inlet and areas accessed by the Hoonah road system. The mountains on the north side of Tenakee Inlet serve as a dividing line for Tenakee Inlet deer and deer living north of the mountains in areas accessed by the Hoonah road system. Therefore, only areas accessed by the Hoonah road system on northeast Chichagof Island should be included in proposal 22-08 and the north shore of Tenakee Inlet should be excluded.

ADF&G deer harvest and hunter effort data applies to all three proposals.

1. Deer populations are at very high levels.
2. There have been substantial decreases in hunting effort by FQUs
3. There has not been any noticeable increase in hunting effort by NFQUs
4. The reduced number of FQUs still hunting are harvesting more deer than in the past.
5. There is simply no justification to support any of the three proposals.

In conclusion

There are very high numbers of deer available in all areas covered by these proposals, however, FQU hunters are no longer hunting. They are not taking advantage of the standard deer season (August 1 – December 31) or their priority opportunity of hunting through January. Deer are often most available during January, due to winter snow levels, etc.

Any restriction of NFQU deer hunting opportunity will not increase subsistence harvests in the villages. FQUs from the villages need to get out of the house and out of their vehicles and back into the woods to get their deer. They will have no problem.

Proposals 22-07, 22-08, and 22-09 are based on inaccurate beliefs of FQUs in the villages and lack any justification. Adoption of any of these proposals would be a needless and huge disservice to many hunters in northern southeast Alaska, hunting a strong public resource, on public lands.

Please reject (not approve) proposals 22-07, 22-08, and 22-09.

Thank you for the opportunity to comment.

Sincerely,

Mike Bethers
Auke Bay, Alaska

Mike Bovitz

9500 N Douglas Hwy

Juneau, AK 99801

(907)723-2279

Metahworks@gci.net

Theo Matuskowitz

Federal Subsistence Board

Office of Subsistence Management

1011 East Tudor Road , MS-121

Anchorage, Ak 99503-6199

Re: wildlife proposals 22-07, 22-08, and 22-09

Hello Mr. Matuskowitz:

I am NOT in support of the 3 wildlife proposals-22-07 Angoon, 22-08 Hoonah, and 22-09 Pelican.

The rural subsistence deer hunters/Federally qualified users are claiming it is getting harder to fill their quota of deer. They are concerned about the potential of not enough deer for their personal use to live a subsistence living. There is no science based facts to what is being questioned or science based facts to what they are stating on the deer population.

Alaska fish and game do harvest studies, pellet counts, flights for deer etc, etc. This is all paid for by every Alaskan through tax dollars. Based on their science the number of deer is quite plentiful and Federally Qualified Users already have an extended season going through January 31st. Alaska fish and game last year allowed every resident 6 deer instead of the normal 4. Why would they do that if there was a resource problem?

The only thing that has changed over the past years is our weather pattern. Snow is no longer coming in and staying on the beach for long periods of time driving the deer to the beach. Which is a good thing because as those big snow falls happen mother nature NOT man takes over and the deer start to die .

Proposals 22-07, 22-08, and 22-09 are not science based, have no justification, and would be the wrong thing to do to many Southeast Alaska hunters, hunting a public resource.

Please REJECT and NOT APPROVE proposal 22-07, 22-08, 22-09

Thank you for your time,

Mike Bovitz

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] SE Deer Hunting

Lee Bridgman <Lee.aklife@outlook.com>

Fri 7/9/2021 1:53 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

**This email has been received from outside of DOI - Use caution before clicking on links,
opening attachments, or responding.**

RE: proposed changes to deer hunting in Unit 4 are WP22-07, WP22-08, WP22-09, and WP22-10.

I myself do not hunt in the Southeast and do not believe the large numbers are making their way to hunt deer in this area. The cost of getting there compared to the game meat taken would make the trip counter productive. As for the Wanton Waste of game meat, I would believe that F&G would be very able to check vessels arriving in Juneau for proper care of the game meat.

The proposals will only further divide the user groups, which is not a desired result. If limits need to be reduced, for all, then so be it.

Do not proceed with these proposals.

Thank you,

Lee H. Bridgman

763 Wanda Dr

North Pole, AK 99705

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWUOTgtNDQ1O504YjQxLWE0YzY0NW03MDNjZQAQAEeX...> 1/1

7/5/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-07

Tel k <tel.brown89@gmail.com>

Mon 7/5/2021 9:17 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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WP22-07 there is no reason to close deer hunting on admiralty Island to the public. The population is plentiful so there is no need to make this subsistence only. There are plenty of deer on this island and there have been for years. I personally work with people who live or have lived in angoon and none of them have ever had a problem harvesting deer. If they aren't turning in deer tags it's because they don't report the deer they kill. There is no reason what so ever to close admiralty Island for public deer hunting. There are more than enough deer on the island to support hunting. I even work on the island so you can't tell me there aren't enough deer on admiralty.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWUOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAMb0...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] FW: [External Email]Deer hunting

Perry, Deanna -FS <deanna.perry@usda.gov>

Mon 7/19/2021 1:30 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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From: Alpine Construction Enterprises <alpineconstructionenterprises@gmail.com>
Sent: Monday, July 19, 2021 1:20 PM
To: Perry, Deanna -FS <deanna.perry@usda.gov>
Subject: [External Email]Deer hunting

[External Email]
If this message comes from an **unexpected sender** or references a **vague/unexpected topic**,
Use caution before clicking links or opening attachments.
Please send any concerns or suspicious messages to: Scam.Abuse@usda.gov

To whom it may concern;

I'm writing in reference to:

WP22-07 2022 Wildlife Proposed Regulation Change Organization

I am opposed to the changes presented to harvesting of deer in these areas. I do not believe this is an accurate portrayal of the deer hunting situation. As a land owner in the village of Angoon to not be allowed to hunt without permanent residency would be absurd.

Thank you,

Adam Brown

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7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Public comment: Wildlife proposals 22-07, 08, 09

Kelly Cates <kacates@alaska.edu>

Mon 7/19/2021 9:31 PM

To: AK Subsistence, FW7 <subsistence@fw.gov>

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Dear Subsistence Management Board,

I am writing in opposition to wildlife proposals 22-07, 22-08 and 22-09. I am a SE hunter and my family regularly hunts in each of the proposed areas. We rely on subsistence meats to feed us through the year and enjoy the memories created from our hunting trips. It is unclear to me why these proposals were initiated as the data outlined in the packets suggests that deer populations are thriving and that FQU's are harvesting more deer than they used to. So if there are plenty of deer and enough for all users, why should one user group be excluded? Again, I oppose these proposals and hope the facts outlined in the information packets are fairly weighed in the boards decision.

Thanks,
Kelly Cates

--

Kelly Cates, PhD Candidate
College of Fisheries and Ocean Sciences
Juneau Fisheries Division, University of Alaska Fairbanks
kacates@alaska.edu | (907) 620-5032

'May your trails be crooked, winding, lonesome, dangerous, leading to the most amazing view'



7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comments for WP22-07,8,9,10

Matthew Catterson <mattcatterson@yahoo.com>

Fri 7/16/2021 4:30 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Federal Subsistence Board Members,

I am writing to comment in respectful opposition to the regulatory actions proposed in WP22-07, WP22-08, WP22-09, WP22-10. I am currently a resident of Juneau, but I have spent most of the past 15 years residing in the Southeast Alaska communities of Yakutat and Sitka. My time living, working, fishing, and hunting in these communities has engendered in me a great respect and connection to the subsistence lifestyle.

Because of my background, I can certainly empathize with the concerns presented by the authors of these proposals. However, the information provided in ADF&G Department comments is aligned with my experiences hunting in the proposal areas, which is that hunting effort in these areas is minimal and that competition between hunters is not responsible for trends of reduced deer harvest by FQUs or NFQUs. I believe it is widely accepted that environmental conditions (harsh winters), not hunting pressure, is the primary driver of deer abundance in Northern Southeast Alaska.

I would ask Federal Subsistence Board members to very carefully consider these proposals that significantly reduce available hunting areas to residents of Juneau. As you know, just because someone lives in a larger community like Juneau, does not mean they don't live a subsistence lifestyle and place great cultural, traditional, and personal value on a connection to the natural world that is based on procuring food for themselves, their family, and their community. The closures and bag limits reductions in these proposals would significantly impact traditional hunting use patterns for many people who live in Juneau and should only be enacted in extremely dire circumstances.

As an alternative, I would not oppose regulatory changes that increase opportunity for FQU's while maintaining existing hunting opportunity for NFQUs. This type of regulatory change, coupled with ADF&G assertions that deer abundance is relatively stable in proposal areas, may achieve the increased harvest sought by proposal authors.

Thank you for your time and consideration of my comments.

Matt Catterson, Douglas, Alaska

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1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Unit 4 WP22-07, WP22-08, WP22-09, WP22-10 Proposed closure of
Blacktail deer seasons to non-subsistence hunters

Ken Couch <kc_n_gurls@yahoo.com>

Mon 7/19/2021 5:35 AM

To: Matuskowitz, Theo TM <theo_matuskowitz@fws.gov>; AK Subsistence, FW7 <subsistence@fws.gov>

Cc: AK Subsistence, FW7 <subsistence@fws.gov>

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I am opposed to these proposals because there is no scientific evidence or biological data to support these recommendations. ADFG biologists are on record stating the proposed closures will unnecessarily restrict non-subsistence hunters of opportunity to hunt contrary to Title VIII of ANILCA. There is no biological evidence or even a reason to believe that non-subsistence hunters are affecting the federally-qualified subsistence hunters ability to harvest deer.

I am getting tired of RACs, aided and abetted by the Subsistence Office of FWS Region7 continuing to waste public funds on these frivolous proposals to give federally-qualified subsistence hunters a private hunting club paid for by all Federal tax payers. Federal Regulations REQUIRE that the proponent of any rule change has the burden of proof to show the proposed change is necessary. The RAC has not provided any proof. Instead, all this is just wasting tax dollars. Maybe all the non-subsistence hunters should start making frivolous proposals that the RAC has to fight. Then maybe they would not have time to waste time and tax dollars on unsubstantiated claims.

Ken Couch

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/idiAAQkADZINDE2M2RbLWlOTgtfNDQ1O504YjQxLWE0YzY0NW03MDNjZQAQAH...> 1/1

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Proposals 22-07/08/09

Elias Daugherty <elias1547@yahoo.com>

Mon 7/12/2021 4:39 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I Elias Daugherty
Oppose the proposal 22- 07/08/09
The deer numbers show healthy and Sustainable.

I do think that nNon-residents becoming residents should have a stricter and longer qualification period
For hunting
Privileges
Such as a 5 year stay required.

I also believe if there is a concern about deer numbers being taken that the price for non-resident deer tags should increase. And Stricter non-guided deer hunts.

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/idiAAQkADZINDE2M2RRLWlOTgtfNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQANW...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] deer hunting proposal

Atlin Daugherty <akhomefire@yahoo.com>

Sat 7/17/2021 10:31 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Hello my name is Atlin Daugherty I am a third generation Alaskan and my son is forth. I was born and raised in Juneau. I am a commercial fisherman and a hunting guide my two occupations. Deer hunting is very dear to me and my family and our main meat food source. I am writing in opposition to the three proposals to close fee hunting areas to non subsistence deer hunters. I am opposed to all three I personally hunt the North West corner of Chichagof.

The state biologist data for deer numbers and harvest numbers do not support such an aggressive proposals and shut down. Also the displacement of hunts could have a unintended adverse affect on the deer population out side of these areas.

Many people who grew up in villages and now live in Juneau, will be locked out out of these proposed area's. Or multi generational family such as myself and who were born and raised in Juneau who use these areas to deer hunt will no longer be doing so. The Irony of this is Life long Alaskans who live in Juneau or Ketchikan Year Round won't be able to hunt these area while somebody who claims residency in one of these villages spends 4 months there and then spends the rest of the year in Hawaii qualify for these hunts.

One solution to this might be to have the non substance qualified users deer harvest to go back to 4 deer per person rather then 6.

Thank you for your time

Atlin Daugherty

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RbLWlOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAJE...> 1/1

7/1/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

John Demuth <jdemuth@pndengineers.com>

Wed 6/30/2021 5:46 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Attention: Theo Matuskowitz

The intent of this email is to voice my opposition to the following proposals:

- WP22-07
- WP22-08
- WP22-09

The population of deer in these areas (as all areas in SE Alaska and Kodiak) has historically been impacted primarily by weather, and in particular the amount of snow experience in a given winter/early spring – NOT by the small percentage of hunters who may choose to venture further away from towns/areas with greater hunting pressure – i.e. Juneau. When heavy snow kills off deer, EVERYONE feels the impacts due to reduced numbers of deer.

W22-07 in particular is extremely exclusive and excessive as it covers over 70 miles of the west side of Admiralty Island – 40 miles north and 30 miles south. This is simply outrageous. NOBODY in Angoon hunts 30-40 miles from town, but rather they hunt primarily in Mitchell Bay due to the close proximity and favorable weather conditions – i.e. protected from high wind/waves. In addition, the vast majority of hunting pressure on the south end of Admiralty is from Petersburg and Kake hunters – who also qualify as subsistence hunters and hence will continue to compete with Angoon hunters – effectively changing nothing. The proposal clearly is intended to exclude Juneau hunters from hunting on the west side of Admiralty Island and will hence increase hunting pressure on the east side of Admiralty. The intent seems reasonable, but the range/area is far too large and should be reconsidered to be more focused on the immediate area around Angoon.

Thank you for your consideration.

- John DeMuth

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Unit 4 deer proposal

luke dihle <lukeolaf@yahoo.com>

Sun 7/18/2021 8:21 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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In regards to limitations in non subsistence hunters access to federal lands to hunt I believe this time period is too extreme. I am a lifelong Alaskan and currently live in Juneau. I would support some limited period of time that rural communities could hunt around there areas without "outsiders"but this time frame is too long. As shown by the numbers outlined in Fish and games response this does not appear necessary. It's limits many other Alaskans ability to fill their freezer with minimal benefit to a few.

Sincerely
Luke Dihle

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWlOTgtNDQ1O504YjQxLWE0YzY0NW03MDNjZQAQACx...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Public Comments Regarding Subsistence Management Program 2022-2024

Jared Erickson <erickson_jared@yahoo.com>

Sat 7/17/2021 7:43 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Public Comments Regarding Federal Subsistence Management Program 2022-2024:

WP22-07

WP22-08

WP22-09

WP22-10

Federal Subsistence Board-

I would like to take this opportunity to voice my opposition to the proposed changes to the above referenced deer hunting regulations in SE Alaska. To manage a population of a targeted animal species for harvest, I do believe it would be a mistake to consider anything other than the health of the population of that species. The ADF&G recently produced a comment response to the above proposed changes and the general trends show that there are fewer FQU's hunting, and they are hunting fewer days per year. The data also strongly suggested that the the Sitka Black Tail Deer populations in the areas referenced above are absolutely healthy and stable. That is, it has been a renewable source of food for all user groups for many years. The above proposals also do not take into account that deer at, or below, the mean high tide mark would still be eligible for harvest by the NFQU user group. I believe that this would actually make the concern worse due to the fact that all hunting efforts in these areas by NFQU's would be focused on the easier deer to harvest. If a NFQU is not allowed to harvest deer at elevation, or via flying into a lake that drains into these areas, the focus will shift to the deer near below the mean high tide level. This would generate the exact opposite effect as what is desired. I also believe it would be very hard to enforce the new proposals. The most concerning example I can think of is what will happen if a deer is shot below mean high tide, but then expires and is recovered above the mean high tide? A difficult scenario and one that invites controversy.

The above areas do have a natural barrier against too much traffic. For the months of concern, the population from Juneau must transit around Point Retreat and navigate Southern Lynn Canal to get to these areas if they are hunting by boat. This is the same body of water that will often prevent the Alaska Marine Highway System from making scheduled trips due to wave height and wind. The FQU's are positioned in the heart of the best hunting areas, giving them distinct geographic advantage.

If the true problem is FQU's not meeting their ANS, there are alternatives to the above proposals. Perhaps the Subsistence Board could consider subsidies to the FQU's in terms of fuel or equipment. Another option may be to liberalize proxy hunting for the communities in need. But if the real reason the FQU is experiencing a decrease in deer harvest rates has to do with fewer hunters putting in fewer days we should not penalize other user groups who use the same resource for the same reasons.

I have been a resident of Alaska my entire life, nearly 45 years, and Sitka Blacktail Deer from the regions above are an important part of calories for myself and my family throughout the year. I would like to voice my support for keeping the hunting regulations as they are and not preventing NFQU's the opportunity to continue to utilize this healthy, renewable source of food in our region.

Sincerely-
Jared Erickson
Juneau, AK

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/Id/AAQkADZINDE2MZRhLWtOtgfNDQ1O504YjQxLWE0YzY0NW03MDNjZQAQAGq...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comments RE: All Southeast deer proposals, including but not limited to WP22-07, WP22-08, WP22-09, and WP22-10

Kyle Ferguson <pabucktail@hotmail.com>

Mon 7/19/2021 5:34 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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As an over 20 year resident of Sitka, and a federally qualified subsistence deer hunter, I would like to state my opposition to the proposals attempting to limit the deer hunting opportunity for non-qualified hunters in Southeast Alaska. My opposition is for the following three reasons:

First, there is no valid scientific reason for the proposed limitations. There are currently no existing or anticipated population concerns for deer in Southeast Alaska. Deer numbers across the region are increasing. With the general pattern of mild winters in the last decade Admiralty, Baranof, and Chichagof deer numbers are as good as they've ever been. In GMU 3 it looks like deer numbers are the best they've been in at least a generation. Scientific study of deer numbers in GMU 4 showed that numbers are high enough to sustain a limit for all residents of 6 deer per year. Anecdotal information from hunters and people who live in Southeast's subsistence communities indicates the general impression of excellent deer numbers.

Secondly, there is no valid social reason for the proposed limitations. In a 7/16/21 article in the Sitka Sentinel members of the Regional Advisory Council were interviewed and stated their rationalizations for these proposals. The reasoning revolved around perceptions of unfairness related to boats and trucks owned by other hunters accessing hunting areas, and perceptions of increased competition and decreased opportunity for federally qualified users. Neither of these points stands up under the scrutiny of facts. No matter who we are, there will always be someone with a better truck or boat than any one of us. Being offended by this reality will make us all a bunch of victim-based thinkers, and in sum are the mere voice of emotions rather than real facts. In regards to the idea of increased competition and decreased opportunity, if anywhere were to qualify for such an idea it would be Sitka, the subsistence community with the greatest numbers of qualified, non-qualified and non-resident hunters. In spite of the greatest numbers of competition, Sitka hunters don't seem to have a problem meeting their subsistence deer meat needs. This fact was acknowledged by Sitka RAC member Harvey Kitka who stated Sitka hunters don't have the problems alluded to by the RAC members from other communities.

In contrast, there are actual social reasons for rejecting these proposals. Deer hunting anywhere, but especially in Southeast Alaska, is a time-honored activity which affords people an opportunity to sustain themselves while enjoying and passing on a heritage that transcends generations. We all live in small towns here. The reality is that for reasons of employment, marriage, medical concerns, education, or various other factors, any one of us could find ourselves with family members living in non-qualified Alaska communities, or down south. I hate to envision a scenario where a grandfather in Sitka, an uncle in Angoon, or father in Kake couldn't take a young person deer hunting because a proposal such as this made it illegal to mentor the next generation.

Lastly, data and facts shows there's no practical reason for the proposed limitations. In the same 7/16/21 Sitka Sentinel article ADF&G biologist Steve Bethune was interviewed. He pointed out some

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7/21/2021

Mail - AK Subsistence, FW7 - Outlook

interesting facts related to hunter effort. Across the region it seems hunting pressure is light. Additionally, non-qualified hunter effort has remained stable while hunting effort by qualified subsistence hunters has declined. I don't know why there are presumably less qualified subsistence hunters, or why the same numbers of hunters are hunting less days. But the fact remains that the data shows if anything, hunters in the communities involved in this proposal have even greater opportunity than they did ten or twenty years ago.

Thank you for your hearing and consideration,

Kyle Ferguson, Sitka

sent from [Outlook](#)

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id:AAQkADZINDE2M2RrLWwOTgtNDQ1O504YjQxLWE0Y2Y0NW03MDNjZDAQAIsn...> 2/2

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] opposition to these proposals

Ron Flint <ron@nuggetoutfitter.com>

Mon 7/19/2021 2:02 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Federal Subsistence Board;

Count me in opposition to the following proposals.

1. western Admiralty from Sept 15 to Nov 30 that includes Hawk Inlet and south WP22-07
2. reduced bag limit for Chichagof (Hoonah and Tenakee, Freshwater Bay) from 3 to 2 WP22-08
3. closure of Lisianski Oct 15-Dec 31 WP22-09

Thank you for your time,

Ron Flint

12070 Cross St.

Juneau, AK. 99801

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWlOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAPIS...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comments regarding 22-07, 22-09

Peter Flynn <flynn.peter@gmail.com>

Mon 7/19/2021 8:32 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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opening attachments, or responding.**

To whom it may concern,

I am an active hunter from Juneau, AK who would be affected by proposals 22-07 and 22-09. Myself and the group of people whom I hunt with also respect and hold great respect for the subsistence rights of other people in this state and wholly support their right to put food in the freezer. As hunters we hunt what only we can eat, aren't after trophies, and respect the land. We often hunt out of a cabin off the hoonah road system, always enjoying our conversations with neighbors and locals whether on the ferry, on the roads, or in town. We also fly into many of the affected areas, sometimes directly from Juneau sometimes from other local airports, enjoying the cabins and beautifully different terrains that are available there. I am opposed to the aforementioned proposals as I believe there are better tools than closure to ensure that subsistence needs are protected without wholly excluding other parties, especially with such a healthy population of blacktails. Other tools are available that would provide for all affected parties such as altering bag limits depending on your subsistence qualification. Curtailing bag limits for non-subsistence-qualified hunters in these areas would keep subsistence as the dominant harvests while regional hunters from larger towns would be able to participate, as is being proposed in 22-08.

Thank you for your consideration,

Peter Flynn

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/idiAAQkADZINDE2M2RRLWlOTgtNDQ1O504YjQxLWE0YzY0NW03MDNjZQAQAMg6...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-07, WP22-08, and WP22-09

Charles Frey <cfrey09@gmail.com>

Fri 7/16/2021 3:36 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I am firmly opposed to WP22-07, WP22-08 and WP22-09. These proposals rely on hearsay & unscientific data to back up the proposed changes. The Alaska Dept of Fish & game who studies these areas is opposed as they cite healthy deer numbers. In addition, these areas are hard to access & have relatively light hunting pressure. This is pure & simple federal overreach & an attempt to lock down Alaska's wilderness for a self-serving reason by those in charge & those who sponsored these proposals.

Regards,
Charles Frey

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWUOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAipV...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Oppose WP22-07

Ben Genz <bengenz@yahoo.com>

Mon 7/19/2021 7:43 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I am opposed to this proposal as there is no scientific evidence or biological data to support these recommendations. ADFG biologists are on record stating the proposed closures will unnecessarily restrict non-subsistence hunters of opportunity to hunt contrary to Title VIII of ANILCA. There is no biological evidence that non-subsistence hunters are affecting the federally-qualified subsistence hunters ability to harvest deer.

Federal Regulations require the proponent of any rule change has the burden of proof to show the proposed change is necessary. The RAC has not provided any proof.

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-07 Deer Hunting proposal for Admiralty Island, Unit 4

gilbertson@gci.net <gilbertson@gci.net>

Tue 7/13/2021 8:08 PM

To: deanna.perry@usda.gov <deanna.perry@usda.gov>; AK Subsistence, FW7 <subsistence@fws.gov>

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I am taken aback by the breadth of the proposal to limit deer hunting opportunities on Admiralty Island. It is too far-reaching.

Much of the northern part of Admiralty Island is a popular deer hunting area for residents who don't live in Angoon. I have property and a cabin on Wheeler Creek just east of Pt. Marsden and have hunted there every fall since 1975. I spend many weeks there in the fall. It is part of my urban subsistence lifestyle. Wild food has been part of my existence for many years. In all those years I have rarely encountered people from elsewhere in the woods. It is 40 miles from Pt Marsden to Angoon and it takes a lot of fuel and good weather to go that far for a deer.

Another observation after hunting in the area for 46 years and watching current populations of deer is that there are plenty to go around for everyone. Mostly it is weather that affects whether you can get deer or not, not just keeping other hunters from your area.

My preference is for this proposal to be turned down. However, an acceptable alternative that addresses the intent of the proposal, would be to limit the exclusive area boundary north of Angoon to Fishery Pt rather than Pt Marsden. This would provide adequate exclusive hunting opportunities for Angoon hunters without igniting the urban versus rural debate. It would also continue the opportunity for hunters to fly into Lake Kathleen and Lake Florence.

Steve Gilbertson
Wheeler Creek property owner

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/idiAAQkADZINDE2M2RRLWUOTgtNDQ1O504YjQxLWE0YzY0NW03MDNjZQAQAHvv...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Opposition of proposals 22-07, 22-08 and 22-09

Mary Glaves <Mare_e86@hotmail.com>

Mon 7/19/2021 1:24 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Dear Federal Subsistence Board,

These proposals do not seem to be being proposed based on science and monitoring of deer populations. ADF&G recently INCREASED the annual bag limit of deer from 4-6 in Port Frederick. FQUs are also allotted an additional month (January 1-31) to subsistence hunt, which actually puts unnecessary pressure on deer during the hardest month of winter for the deer, and the easiest month for someone to harvest a deer as they get pushed down to the beaches. These proposals add unnecessary restrictions to Juneau and Ketchikan residents. ADF&G assessments for all units to do support these proposals. I, also, do not support them.

Mary Glaves

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2MRhLWtOTgtNDQ1O504YjQxLWE0Y2Y0NW03MDNjZQAQAKK...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] opposition to all federal deer subsistence proposals. WP2207 -- Wp2212

RICHARD HARRIS <RHDevelopment@gci.net>

Thu 7/15/2021 12:38 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

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opening attachments, or responding.**

Attn: Theo Matuskowitz,

Office of Subsistence Management

Regarding : Federal deer subsistence proposals Region-1 Southeast Alaska

Proposal Numbers: WP2207, WP2208, WP2209, WP2210, WP2212

As a lifelong deer hunter of Southeast Alaska I am writing to oppose the federal subsistence proposals for deer harvesting in Southeast Alaska. I have hunted some of these areas my entire life, access to the areas listed is very difficult, needing good weather and much planning, I believe the weather controls much of the hunting pressure from non-federally qualified users in these areas(somewhat self regulating). I could understand supporting a lower per hunter harvest number in some areas, but shutting these areas down entirely during the period of Oct. 15 - Dec. 31, to non-federally qualified hunters is not acceptable. Limiting hunting to any months other than Oct. 15 - Dec. 31 should be considered a complete shut down as this is the only period a hunter can actually hunt and experience the calling of a deer, during the rutting season. Any regulation changes made should include some changes to the federally qualified user as well, not all but some are doing as much damage to the resource with immediate access and extended hunt seasons as the non-federally qualified user who has limited access and shorter harvest seasons. Also as I understand these proposals have no basis, there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. I hope you will take these comments into consideration and reject these proposals.

Thank you,

Richard Harris

P.O. Box 32403

Juneau, Alaska 99803

Richard Harris

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/idiAAQkADZINDE2M2RbLWlOTgtfNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAQ0yO...> 1/2



Post Office Box 32712 • Juneau, Alaska 99803

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

July 14, 2021

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

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-07) to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort is also declining. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

TSI opposes this proposal and respectfully asks that it not be adopted.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn Hooton".

Shawn Hooton
 Vice President, TSI

Sportsmen Promoting Conservation of Alaska's Fish and Wildlife Since 1945

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Subsistence proposals for Sitka Blacktail Deer in AK

Brooks Horan <brookshoran@yahoo.com>

Wed 7/14/2021 9:58 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

 3 attachments (2 MB)

WP22_09 ADFG comments Draft_Final.pdf; WP22_08 ADFG comments Draft_Final.pdf; WP22_07 ADFG comments Draft_Final.pdf;

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Dear Sir/Ma'am,

I am writing to express my lack of support for the proposed changes to sitka blacktail hunting in SE Alaska. The data just does not support these changes. I understand that the purpose of the subsistence board is to listen to rural residents in AK. I have respect for the decisions made by the board to ensure proper distribution of resources. As a past Kodiak resident, I experienced scientifically sound board decisions first hand, and benefited from them. But in this instance, the data does not support the proposed changes. Take the Lisianski proposal, the hunter data shows that success rates for rural residents/federally qualified users (FQUs) is the best in the state. Given that success rate, the actual number of rural resident hunters has decreased. There is just no mathematical or scientific reason to support this change to limit access to non-federally qualified users (NFQUs). I fear cutting such huge swaths of land out for FQUs will concentrate NFQUs into a smaller area making overall deer management that much more difficult. I strongly oppose these proposals as a scientist and as a resource user. I have attached the ADFG comments which represents the best evidence to support my input. Thank you for your time and for the work you do to ensure that the best science is followed in these management decisions. I hope this comment reaches you before the July 19th deadline and can be considered in your decision along with the comments of my fellow Alaskans.

Very Respectfully,

Brooks Horan

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wildlife proposal 22-07

Aaron Hulett <aaronthenurse@icloud.com>

Sat 7/17/2021 10:13 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Regarding wildlife proposal 22-07 on Admiralty island in Alaska I would like to voice my opposition. The numbers of deer on the island and harvest data do not support the claims made. This change would have a dramatic negative impact on non-federally qualified users and minimal or no positive effect for federally qualified users.

Thank you,

Aaron Hulett
1670 Mendenhall Peninsula Rd
Juneau, AK 99801
(360)460-4179

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWlOTgtNDQ1O504YjQxLWE0YzY0NW03MDNjZQAQAGI7...> 1/1

Federal Subsistence Board - Attn: Theo Matuskowitz

Office of Subsistence Management

1011 East Tudor Road, MS-121

Anchorage, AK 99503-6199

Dear Federal Subsistence Board,

The Alaska Department of Fish and Game's Juneau-Douglas Advisory Committee thanks you for the opportunity to submit written testimony on WP22-07, WP22-08, and WP22-09.

Our 15-member citizen volunteer committee represents diverse user groups and perspectives; we have designated seats for people who represent commercial fishing, sport fishing, hunting/personal use, hunting guiding, charter fishing, trapping, as well as non-consumptive users. We strive to represent the interests of our diverse constituencies, holding a half dozen meetings each year to both discuss fish and game issues as well as to create a public forum for consideration of proposed regulations that impact our region. Under the guidance of the Alaska Department of Fish and Game, our body is charged with weighing proposals that will impact State of Alaska Game Management Units 1C, 1D, 4, and 5, but we pride ourselves in thinking inclusively about our broader region.

Like the Federal Subsistence Board and the Regional Advisory committee, we believe we need to support rules and regulations that create equitable and sustainable fishing and hunting opportunity. As a group, we are thankful to have abundant opportunity to fish, hunt, and feed our families from the land, and, for many of us, to earn our living from well managed and abundant fish and ungulate populations. We also recognize and celebrate the cultural significance that fishing, hunting, and gathering have for so many people in our region. While we live in Juneau--and we recognize that there is more pressure on our wild fish and animals close to town--most of us travel regionwide to hunt, fish, and work, and we are especially mindful of the incredibly important role that hunting plays in rural Alaska. Finally, all our discussions and recommendations are underscored by a strong desire to ensure equitable access to wild food well into the future.

We see that there are legitimate concerns raised by those who participated in the meetings that lead to these proposals; indeed, the lack of ferry service and the broader impacts from the Covid-19 pandemic have created real impacts on food security in rural communities. We are not convinced, however, that these proposals best address the issues raised in the comments.

Instead of addressing these very real food security hardships, we worry the proposals could instead amplify tensions between federally qualified and non-federally qualified hunters, straining cultural and family ties between communities in Southeast Alaska. Because residents of our region move between rural areas and especially Juneau for work and school (and demographic trends suggest this movement from rural to more urban areas has been especially pronounced over the last decade), there are significant numbers of now-Juneau-based hunters who return home to villages to hunt with family. As such, these proposals could in fact reduce harvest success for those who need it most. That is, the non-federally qualified hunters who successfully harvest animals in each of these areas are often former federally qualified hunters who have moved to Juneau, but return home to help put up food for their families.

In each of these proposals, we also concur with Alaska Department of Fish and Game's detailed and well-researched position that the proposals' respective closures to non-federally qualified users are not warranted for conservation concerns. We therefore see these as allocative proposals, serving to limit opportunity for residents of our region.

We look forward to continuing to listen and to understand the concerns raised by federally qualified hunters, and we stand ready to create a forum to discuss ways to address these issues. Such a forum or open dialogue between users across the region would strengthen our shared interest in sustaining the strong connections to the land provided by traditions of hunting and fishing. We would also be happy to work with the Regional Advisory Committee to propose and champion changes through the Alaska Board of Game process that could alleviate some of the problems.

We urge you to maintain consistent access to deer hunting opportunity for residents of our sparsely populated region by voting no on these proposals.

Sincerely,

Juneau Douglas Advisory Committee

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wildlife proposals 22-07 through 22-09

Jones Chiropractic <akchiros@gmail.com>

Mon 7/19/2021 10:34 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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

Dear Federal Subsistence Board,

I have deer hunted Admiralty Island and Chichagof Island for the last 25 years. From my personal experience, I wholly agree with Alaska Department of Fish and Game's (ADF&G's) assessments on the following proposals.

I oppose the Wildlife proposal 22-07 that attempts to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). I wholly support ADF&G's comments opposing this proposal.

I agree with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty (highest in the State), ADF&G increased the annual bag limit from 4 to 6 in 2019. Additionally, total hunting effort is relatively light and hunter efforts and harvests have declined.

ADF&G concludes the actual reason for the decline of federally qualified user (FQU) deer harvests are from a decline in participation and effort by FQU's, NOT depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort is also declining. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQU's, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-07 and respectfully ask that it not be adopted.

I oppose Wildlife Proposal 22-08 that attempts to reduce the bag limit from 3 to 2 deer for the Northeast Chichagof Controlled Use Area (NECCUA).

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7/21/2021

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I agree with ADF&G's, assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer in NECCUA, ADF&G increased the annual bag limit from 4 to 6 west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.

ADF&G concludes that the actual reason for the decline of FQU deer harvests is from a decline in participation and effort by FQU's, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort have remained stable. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer, compared to 3 deer for NFQUs. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-08 and respectfully ask that it not be adopted.

I oppose Wildlife Proposal 22-09 that attempts a closure of Lisianski Inlet, Lisianski Strait, and Stag Bay of Chichagof Island October 15 to December 31.

I agree with ADF&G's, assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 in 2019. Additionally, total hunting effort is relatively light and hunter efforts and harvests have declined.

ADF&G concludes that the actual reason for the decline of FQU deer harvests is from a decline in participation and effort by FQU's, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation and effort have remained stable. Additionally, FQU's are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches, allowing for easier harvest. This proposal adds unnecessary restrictions to Juneau and Ketchikan residents, as well as non-residents.

I oppose Wildlife proposal 22-09 and respectfully ask that it not be adopted.

Warm Regards,

Resident Hunter of Alaska

--

Dr. Stefanie Jones

10004 Glacier Hwy
Suite B
Juneau, AK 99801

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/idiAAQkADZINDE2M2RbLWlOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAJov...> 2/3

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP-22 07,08 and 09

David Keller <salheart76@gmail.com>

Mon 7/19/2021 1:58 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Good afternoon,

I am writing to you today to voice my opposition to proposed regulation changes WP-22 07, 08 and 09. I feel that the changes, if approved, would negatively affect hunters who do not qualify for subsistence permits.

Thank you for considering my comments.

Regards,

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWUOTgtNDQ1O504YjQxLWE0YzY0NW03MDNjZQAQAAj7...> 1/1

7/2/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Changes 22-07 22-08 and 22-09

Chris klawonn <chris.klawonn@gmail.com>

Fri 7/2/2021 7:18 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Hello,

My name is Chris Klawonn, I live in Juneau and have been a resident in Juneau for a vast majority of my life. I plan on raising my children here, and I have loved the aspect of boating, fishing, and hunting my entire life. I'd like to keep this short and simple as I hope you are busy reading lots of comments on this topic. Closing the back side of admiralty to specifically Juneau residents is unnecessary, and would be costly and near impossible to regulate. The number of Juneau residents hovers around 35,000, the total number of reported hunters in GMU 4 that reported a harvest in 2019 is 3,377 according to the ADF&G website. Let's assume that every single one of those harvests came from Juneau, which I know from friends and Facebook isn't the case, that's only 1 in 10 people that live in Juneau claiming deer on admiralty. I don't see this as anything near an issue effecting deer population on admiralty. Second, if this proposition did pass you'd need troopers to nearly constantly monitor the back side of admiralty to ensure that nobody is breaking the law. How many officers, boats, and planes would it take to find the few boats from Juneau to genuinely balance the manpower, equipment, and fuel costs. Please understand, I realize the people's frustration of seeing pictures with a huge commercial fishing boat with 20 deer on the bow, and realize that this is a bit excessive on the taking of such a great resource. Even worse is hearing the wonton waste of deer or really any animals, on this island or in any other location. But to squarely place the blame for this on the residents of Juneau is wrong. Admiralty island is 1,646.4 square miles, making it the 7th largest island in the United States. Cutting off half of it to one community of 3000 or so hunters isn't right, and I hope you can see my side.

Good luck with your decision and thank you for your time.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RbLWlOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAPZ1...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Object to Proposals

Jay/Amy Lloyd <jayamyllloyd@gmail.com>

Mon 7/19/2021 12:28 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I would like to submit my objection to proposals WP22-07, WP22-08 and WP22-09.

The abundance of the animals in the areas as stated by the Alaska Department of Fish and Games objection to the proposals does not warrant this action. Federally qualified hunters also have an extended season that they can hunt these areas. I do not feel that these proposals are necessary or required at this time.

Sincerely,
Jay Lloyd

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWUOTgtNDQ1O504YjQxLWE0YzY0NW03MDNjZQAQALXx...> 1/1

7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comments opposed to proposals WP22-07, WP-08, and WP-09

David Love <pandalid@yahoo.com>

Tue 7/13/2021 11:51 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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These comments concern Federal subsistence management program's Proposals WP22-07, WP22-08, and WP22-09.

As a hunter who lives in a non-subsistence area (Juneau) but uses sport hunting means to harvest wild game which is an essential source of protein for my annual sustenance, it is my observation (borne out by the ADF&G surveys) that there is not a conservation need to limit sport harvest of deer in any part of Unit 4, Southeast Alaska.

ADF&G Wildlife Conservation has many years of objective, quantitative data that shows that the deer populations in Unit 4 are not depleted, but are in fact at high and stable population levels, even after the heavy snow year of 2020/2021. Restrictions on non-subsistence hunters is not necessary and unfairly targets sport hunters whose numbers and hunt days are stable when NFQUs are declining. Also, the average number of deer harvested in Unit 4 has been stable for all users for 10+ years with good success rates in deer harvested. There is not increasing competition for deer among FQUs and NFQUs.

I urge the Federal Board to NOT support these proposals, and vote to oppose these proposals, since their claims are not true compared to the objective, quantified data showing strong population trends and stable deer harvest in Unit 4.

Thank you for your time, David Love, hunter and resident of Juneau

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/idiAAQkADZINDE2M2RRLWlOTgtNDQ1O504YjQxLWE0Y2Y0NW03MDNjZQAQALz8...> 1/1



**BACKCOUNTRY
HUNTERS & ANGLERS
ALASKA**

Alaska Backcountry Hunters & Anglers Comments on Wildlife Proposal 22-07 and Wildlife Proposal 22-09

Proposed Change to Federal Regulation:

"Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users hunting under these regulations."

Backcountry Hunters & Anglers advocates for an ecosystem wide approach to land and wildlife management and to ensure that the public landscapes we speak up for remain open to hunting and angling. We are supportive of science-based management decisions and support the responsibility of state wildlife agencies to manage fish and wildlife populations on public and private land. We support and strongly encourage cooperation between state and federal management agencies to maintain robust fish and wildlife populations on Federal public land.

Alaska BHA has reviewed the proposals submitted by the Southeast Subsistence Regional Advisory Council (SRAC), the meeting transcripts, as well as hunter participation, harvest and population data provided by the Alaska Department of Fish and Game. We recommend the Federal Subsistence Board oppose the proposed closure of Federal public lands to hunting of deer by non-federally qualified users. Alaska BHA does not see that there is adequate information related to deer populations and harvest to meet the high burden needed to close Federal public lands or that these proposed closures will necessarily solve the problems identified by the SRAC.

Although we are opposing this proposal, Alaska BHA would like to bring up concerns that we have, some of which were expressed by the Council.

1. The Council expressed concern in the spring meetings that there is a limited selection of tools available for them to use to address their concerns. Several members expressed hesitancy over supporting these proposals due to their concern that they did not necessarily want to limit non-federally qualified users but lacked any other options.
 - a. Alaska BHA would like to express our support of the Council in this regard and we would take this opportunity to support and encourage the concept of agency co-management. We understand the unique situation of subsistence management in Alaska and believe this situation calls for a stronger working relationship between state and federal agencies than is needed in other states where federal agencies are charged with managing habitat on federal land. An uncooperative relationship between state and federal agencies, as has been recently demonstrated in Alaska by ongoing litigation, leaves hunters and anglers to pay the price, regardless of federal status.
2. Data provided by the Alaska Department of Fish and Game shows that participation by federally qualified users (FQUs) and non-federally qualified users (NFQUs) has been decreasing but that FQUs participation is decreasing at a higher rate.
 - a. Alaska BHA believes that the OSM and ADF&G Subsistence Section should be conducting more surveys to better understand why this decrease is



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ALASKA@BACKCOUNTRYHUNTERS.ORG

- occurring, particularly when Federal land closures are involved. Factors far outside the realm of deer populations and hunt management can affect participation in a hunt and should be considered.
- b. We would like to make the secondary point that decreasing participation rates among hunters and anglers is a concern of our organization. Our Hunting for Sustainability program is focused on ensuring we have future generations of hunters who will speak up on behalf of our lands, waters and wildlife. We do not want people to stop hunting and fishing, regardless of federal status.
3. Alaska BHA heard from both FQUs and NFQUs who share frustrations about waste of game in areas that receive higher hunting pressure, specifically around the Hoonah road system. When game is wasted it takes away present and future opportunities for both NFQUs and FQUs to put food in their freezers. We encourage Federal and State law enforcement agencies to increase enforcement of existing laws and work with local communities to identify illegal hunting activity.
 4. Backcountry Hunters & Anglers was founded around the need for an organization of hunters and anglers to speak up for an ecosystem wide practice of conservation. The Council discussed several concerns leading up to these proposals that Alaska BHA, out of our concern for ecosystem wide conservation, believes are relevant.
 - a. A general reduction in other available resources causes strain on hunters and anglers, especially those who depend more upon food harvested from the land. Reduced salmon and herring runs means less available opportunities to harvest additional food and increases the need to harvest the food that is available, in this case deer.
 - b. Reduction in resources that other animals depend on increases competition. For example: bears, dependent on robust and healthy salmon runs that are now less consistent, may target more deer and thereby make deer more difficult to harvest.
 - c. We share the frustrations of the Council, and many other Alaskans, over the issue of commercial trawl bycatch when many opportunities around the state to harvest halibut, salmon and other fish to put in our freezers are being limited. This increases strain on both FQUs and NFQUs.
 5. Alaska BHA strongly emphasizes the need for these issues to be addressed and would like to remind both State and Federal agencies of your obligations to manage for subsistence priority, regardless of your definition of user group.

As an organization that counts both federally qualified users (FQUs) and non-federally qualified users (NFQUs) among our ranks, the Alaska Chapter of Backcountry Hunters and Anglers would like to offer our assistance in facilitating long-term solutions to the problems addressed by the Council.



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ALASKA@BACKCOUNTRYHUNTERS.ORG

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Proposal WP22-07

Jamalea Martelle <jamalealynn@gmail.com>

Mon 7/19/2021 10:14 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I am writing in regards to proposal WP22-07.

I am a resident of Juneau and I consider myself to be a subsistence hunter. My family's main source of protein comes from our harvests of wild game and fish within Juneau and surrounding Southeast Alaska communities. While there are opportunities to hunt deer in the Juneau and Douglas area, my family and I take one to two trips during the fall to Admiralty Island for deer hunting. These trips are traditional getaways and opportunities for us to explore the many beautiful, remote areas of Admiralty. We support the local economy by chartering flights to and from Forest Service cabins. By taking away the opportunity for non federally qualified subsistence users to hunt deer on Admiralty, you are taking away the privilege of many Alaskans that are traditional, subsistence hunters regardless of living rural. I strongly oppose this Proposal.

Thank you for your time,
Jamalea Martelle

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWlOTgtNDQ1O504YjQxLWE0YzY0NW03MDNjZQAQACys...> 1/1

6/30/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Southeast proposed subsistence deer limitations

Charlie Martelle <martellec@yahoo.com>

Tue 6/29/2021 10:29 PM

To: AK Subsistence, FW7 <subsistence@fwis.gov>

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Hello,

I am writing about the proposed changes of wp-22 07, Wp-22 08, and wp-22 09. I am not in favor of limiting Juneau residents on these areas. I rely on wild game as my main source of protein. By limiting me and other residents of Juneau we will see an increase in the number of hunters in the areas that are not mentioned. This would mean it would be harder to get away from others and find the game we fill our freezers when we hunt closer to town.

We are already so limited in Juneau with hunting, one needs to either have a boat or charter a float plane to find "good" hunting. By dropping the limit on the road system in hoonah you would essentially take our one hunt that doesn't require owning a vessel or chartering.

From my experience on the coast there is abundant numbers of deer, same with the south west side of admiralty. If there was a shortage of animals I would be all for reducing bag limit, but I do not believe this is the case.

Again I am against any changes to the current regulations.

Thank you for your time
Charlie Martelle

[Sent from Yahoo Mail for iPhone](#)

<https://outlook.office365.com/mail/subsistence@fwis.gov/inbox/id/AAQkADZINDE2MRhLWtOTgtNDQ1O504YjQxLWE0Y2Y0NW03MDNjZDAQALNz...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Federal subsistence hunting and trapping regulations comment 2021

Sarah Matula <s_matula1@yahoo.com>

Mon 7/19/2021 1:14 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Federal Subsistence Board Members,

I am writing to comment in respectful opposition to the regulatory actions proposed in WP22-07, WP22-08, WP22-09, WP22-10. I have been a resident of Juneau for 8 years, and have been lucky enough to have gained relationships with people through out SE. Through these relationships, I have had the opportunity to learn, experience, and put into practice in my own life the respect and appreciation for the substance lifestyle.

I would ask Federal Subsistence Board members to very carefully consider these proposals that significantly reduce available hunting areas to residents of Juneau. As you know, just because someone lives in a larger community like Juneau, does not mean they don't live a subsistence lifestyle and place great cultural, traditional, and personal value on a connection to the natural world that is based on procuring food for themselves, their family, and their community. The closures and bag limits reductions in these proposals would significantly impact traditional hunting use patterns for many people who live in Juneau and should only be enacted in extremely dire circumstances.

Thank you for your time-
Sarah Matula, Douglas, Alaska

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWlOTgtNDQ1O504YjQxLWE0YzY0NW03MDNjZQAQAFPo...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Attn: Theo Matuskowitz

Mikesell, John <mik11001@byui.edu>

Sun 7/18/2021 8:08 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

To:

The Federal Subsistence Board

Attention: Theo Matuskowitz

The following is my comment on Subsistence regulation WP22-07:

I disagree with the proposed changes to the regulation. I have had the opportunity to hunt in the Angoon area for the past 18yrs and do not see the need to change the current regulation. I have not seen or been informed of any scientific data that would support the reason for the proposed regulation. Restricting Juneau residents from hunting in those areas would distance family members from being able to hunt in the Angoon community, if anything we want to help these communities. If you believe that this regulation needs to change, I suggest instead of restricting people from hunting altogether, possibly reduce the harvest limit from 6 deer to 4 deer for Juneau residents. I would also suggest limiting taking deer past December 31 to bucks only from December 31st through January 31st(for subsistence). Additionally, if the population of deer is the concern, I strongly disagree with the need to harvest deer past December 31st in the area. Unless an emergency order has been put in place.

Thank you for your time and consideration of my comments.

John Mikesell
Juneau Resident

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/idiAAQkADZINDE2M2RRLWlOTgtNDQ1O504YjQxLWE0YzY0NW03MDNjZQAQAF...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP 22-07; WP 22-08; WP 22-09; WP 22-10

Grey Mitchell <fullcurl@live.com>

Wed 7/14/2021 9:04 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Attn: Theo Matuskowitz, Office of Subsistence Management

I am writing to oppose the referenced federal subsistence proposals for deer in Southeast Alaska as listed above. These proposals have no basis, as there is no evidence of a resource shortage or that non-federally qualified users on federal lands are having an actual impact on federally qualified user's ability to harvest adequate supplies of deer in the specified areas. Without specific data to demonstrate a particular subsistence purpose, these proposals are not only arbitrary and capricious, but they will violate the constitutional rights of non-federally qualified users. The credibility of federal subsistence management of wildlife resources on public lands hinges on the use of scientific data. Not only do these proposals lack scientific data, they lack any data to demonstrate a justified subsistence need. I urge the rejection of these unsupported and unjust proposals. Thank you.

Grey Mitchell
Alaskan since 1966
3065 Douglas Highway
Juneau, Alaska 99801

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id:AAQkADZINDE2M2RRLWlOTgtNDQ1O504YjQxLWE0YzY0NW03MDNjZQAQAAl9o...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-07, WP22-08, WP22-09

Richard Morris <akreeldeal@gmail.com>

Mon 7/19/2021 8:40 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Attention Teo Matuskowitz

Good day,

There are a few proposals that I am writing in opposition to.

The first is WP22-07, which proposes to close the western side of Admiralty from Hawk inlet to the southern tip to non-federal users to make it easier for one group to gather food. I also try to fill my freezer with wild game so this would be selecting them over me. Although I have never hunted the area due to its remoteness and difficulty to get to during the hunting season I feel it will be a stepping stone to closing more of the National Forest as they request larger areas to make it easier for them and more difficult for others. I would say that looking at the ADFG hunt records would show that the majority of hunt effort from Juneau is on the eastern side of Admiralty island and any that can make it to the proposed area would say that hunting there is so much more easy than the eastern side. It is all relative.

WP22-08 is the looking to close the northern area of Chichagof island to non-federal users. I bought property in Freshwater bay for the main purpose of hunting. There are already regulations in place that have a harvest limit of 3 deer versus the 6 I could shoot anywhere else on the ABC islands. This is another remote area for someone from Juneau to access and has limited pressure from Juneau as could be found in the hunt records. The majority of deer that are harvested in the area are mainly road hunts as there is an abundance of logging roads throughout the area. As is the case with hunting, it can be challenging for those that don't get out into the forest and expect to fill there freezer shooting deer on the side of the road. Closing this area would impact the value of my cabin and experiences that come with having it there.

WP22-09 is looking to close other areas in the Hoonah area. Again, due to the remoteness this area does not get a lot of pressure from non-federal users.

In closing, these three proposals are trying to make harvesting deer a sure thing for the communities of Angoon and Hoonah. It is hunting, there are no guarantees that you will see a deer, let alone harvest one. Closing these areas will only benefit a few, and probably only to a small degree. These

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7/19/2021

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areas are in the Tongass National Forest, which is to be managed for all user groups. With these proposals it will start to be managed for the select few and I oppose it.

Thank you,

Rich Morris

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAN1n...> 2/2

7/2/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wildlife Proposal 22-07, 22-08, 22-09

Michael Nelson <michaelbn78@gmail.com>

Thu 7/1/2021 2:49 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I am writing in opposition of these specific proposals, Wildlife Proposal 22-07, Wildlife Proposal 22-08 and Wildlife Proposal 22-09.

These proposals discriminate against Juneau residents unjustly. Excluding the small percentage of Juneau residents that have the ability to hunt in these areas will not increase subsistence means.

Michael Nelson
208-755-7618

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWlOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQA@sq...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Angoon Resident Comment on subsistence regulation WP22-07

James Parkin <jwparkin4@gmail.com>

Fri 7/16/2021 6:24 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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To:
The Federal Subsistence Board
Attention: Theo Matuskowitz

Mr. Matuskowitz

The following is my comment on subsistence regulation WP22-07:

If the regulation is adopted it should include an allowance for Juneau residents to be able to hunt with friends and family of those who live in Angoon or other communities within the restricted area. If this provision cannot be given the regulation should not be adopted. Too many who once lived in the area but had to move to find work or medical care, still have family and friends in the area and return home for subsistence from time to time.

Thank you for your thoughtful consideration of my comments.

P.S.
Please reply to my email to let me know my comments have been properly submitted and will be reviewed.

Jim Parkin

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id:AAQkADZINDE2M2RRLWlOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQACg...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Attention: Theo Matuskowitz - Comment on the subsistence regulation WO22-07

Crystal Shumway <sweetcrystal31@yahoo.com>

Sat 7/17/2021 7:49 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Mr. Matuskowitz

The following is my comment on the subsistence regulation WP22-07

I do not agree with the proposed changes to the regulation. I have been living in Angoon for 28 years and do not see the need for such a drastic change to the current regulation. Furthermore, at this time I have not been informed of any scientific data supporting the changes. Friends and family that grew up in Angoon still return from time to time for hunting. If you strongly believe the the regulation needs to be changed. I would suggest that you look at a change in the limit instead of cutting people off all together. For example, instead of 6 deer maybe 3 for non residents of Angoon.

Thank you for your time and consideration of my comments

Jimmy Parkin

P.s.

Please email me to let me know my comments have been properly received and will be reviewed

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RbLWlOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAKS3...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-07

nicholasporr <nicholasporr@yahoo.com>

Mon 7/19/2021 1:51 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I am writing to urge the board to not pass WP22-07. Though the proposal claims that non-federally qualified hunters are impinging on the ability of federally qualified hunters to meet their subsistence needs, his own testimony at the SE AK federal subsistence board indicates that was not the reason for the proposal. Rather, he said he wanted to limit activity of fall bear hunters who he had caught stealing from his crab pots. While I certainly sympathize with the proposal's author, this proposal is the wrong course of action to address his concerns. It was suggested to the proposal's author at the SE AK federal subsistence board meeting that contacting the USFW district ranger might be a more appropriate course of action. I agree with that suggestion and add that the author might be better served using the ADFG proposal process to address the actions of bear hunters.

This proposal will do nothing to increase the ability of federally qualified hunters to meet their subsistence needs. Most of the non-federally qualified hunters in that area are likely friends & relatives of Angoon residents. As such, given the distance and expense involved in accessing this area, passing this proposal will only serve to strain cultural ties between Angoon and their Juneau based friends and relatives.

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7/13/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Proposals 22-07,08,09,10

Tom Radandt <tomradandt0@gmail.com>

Fri 7/9/2021 2:52 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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There is no scientific evidence that supports the idea that non-Federally qualified users impact the success of qualified users. Therefore you must reject proposals 22-07, 22-08, 22-09 and 22-10.

To favor one group over another bases on any political characteristics is discrimination, which illegal.

Tom

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id:AAQkADZINDE2M2RRLWUOTgtNDQ1O504YjQxLWE0YzY0NW03MDNjZQAQAEqr...> 1/1



unapologetically FOR ALASKAN RESIDENTS

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

July 19, 2021

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

Re: Federal Subsistence Board 2022-2024 Wildlife Proposals and Existing Closures

Dear Federal Subsistence Board Members,

Resident Hunters of Alaska (RHAK) represents several thousand members from across the state, rural and urban, who advocate for sustainable wildlife management policies and a resident hunting priority according to Article 8 of our state constitution.

RHAK participates in Regional Advisory Council (RAC) meetings and Federal Subsistence Board (FSB) meetings, and we have become alarmed at the continuing wildlife proposals and special action requests that are not based on actual biological emergencies or conditions that would prevent federally qualified subsistence users (FQU) from meeting their subsistence needs.

What makes any FSB closures and restrictions especially problematic is that there is no differentiation in the federal system between Alaska residents and nonresidents from another state or country; both Alaska residents and nonresidents are deemed the same under federal regulations by definition of a who is a FQU. A prime example of why this is so problematic is that often complaints about competition from non-local non-federally qualified subsistence users (NFQU) center on the nonresident component, which can often comprise the majority of NFQU hunters participating in these hunts. So, when any restrictions or closures on federal lands happen, Alaskans who used to live in a designated rural area but for whatever reason have moved to more urban areas of the state, can't return home to hunt and carry on their traditional hunting activities on federal lands, nor can other Alaskans participate in these hunts.

It has always been RHAK's position that when and where we have wildlife conservation concerns or subsistence opportunities are not being met, that the *nonresident component should always be the first group of hunters*

Page 1 of 3

*Resident Hunters of Alaska Comments
Federal Subsistence Board 2022-2024 Wildlife Proposals & Existing Closures*

restricted. If other restrictions are still necessary, only then can we support restrictions on resident hunters.

We have always advised RACs to first use the Board of Game (BOG) process when and where there are concerns with too much competition from non-local NFQ hunters, as the BOG can differentiate between Alaska residents and nonresidents.

Comments on Individual Proposals and Existing Closures

WP22-07 Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner are closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users hunting under these regulations.

OPPOSE

The rationale of WP22-07 is not based on any biological data or harvest statistics that show a conservation concern for the deer population on Admiralty Island or that subsistence needs are not being met.

According to Alaska Department of Fish & Game (ADF&G) data, over the last decade we have had mild winters in Game Management Unit 4 and the deer population is "high and stable." The deer population on western Admiralty Island is **not** depleted, as the proposal states. Nor are there any conservation concerns for the deer population under the current hunting regulations.

The proposal also states that there has been increased "hunting pressure" from NFQ hunters and it has "become more challenging for subsistence hunters in Angoon to harvest sufficient deer for their needs" But according to ADF&G data, over the last two decades there has been a **decrease** in both the number of FQU and NFQU.

The FSB operates under ANILCA guidelines and the federal code of regulations that govern when and why any closures to NFQU can happen: "With respect to subsistence uses of a particular fish or wildlife population, the Board may only approve a proposed closure if necessary for reasons of public safety, administration, or to assure the continued viability of such population (ANILCA §816(b), 36 CFR 242.10(d)(4)(vii) and 50 CFR 100.10(d)(4)(vii)). **Meanwhile, the Board may approve a proposed closure of nonsubsistence uses of a particular fish or wildlife population for any of these same reasons, or if necessary for the conservation of healthy populations of fish and wildlife,**

or to continue subsistence uses of such population (ANILCA 5815(3), 36 CFR 242.10(d)(4)(vi) and 50 CFR 100.10(d)(4)(vi)).”¹

The Board should vote down this proposal based on the above guidelines of when any restrictions or closures on federal lands for NFQU are allowed to happen.

WP22-09 Federal public lands draining into Lisianski Inlet, Lisianski Strait, and Stag Bay south of the latitude of Mite Cove (58° 4' N) and north of the latitude of Lost Cove (57° 52' N) are closed to deer hunting Oct. 15 – Dec. 31, except by Federally qualified subsistence users hunting under these regulations.

OPPOSE

Refer to our comments on WP22-07

WCR22-01 Deer Prince of Wales closed Aug. 1-15, except by Federally qualified subsistence users; non- Federally qualified users may only harvest 2 bucks

Rescind closure to NFQU on Price of Wales Island

WCR22-45 Caribou Unit 23 - Portions of Unit 23 - closed to non- Federally qualified users

Rescind closure to NFQU in those portions of Unit 23

Thank you for the opportunity to comment.

Sincerely,

Mark Richards
Executive Director Resident Hunters of Alaska

¹ <https://www.doi.gov/sites/doi.gov/files/uploads/closure-policy-revised-2020-08-04.pdf>

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

Mark Sams <msams@pndengineers.com>

Mon 7/19/2021 7:53 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Attention: Teo Matuskowitz

I would like to make a few opposition comments on the below listed federal subsistence deer hunting proposals

WP22-07

I oppose this change to the deer hunting regulations on the Chatham straight side of Admiralty Island. The regulation will only isolate one user group which has a very low impact on the area due to the distance from Juneau. Due to the distance Juneau residence do not regularly access this area since it is more than 1.5-2hr run time. All other local communities are subsistence communities including, Petersburg, Kake, Tenekee, and Hoonah, leaving Juneau, the furthest community from the location a user group that would be isolated. I think it would be very easy to look at the hunting records collected by the state of Alaska every year to determine how much pressure Juneau actually has on the location to determine how much this change in regulations would actually effect the overall hunting pressure.

WP22-08

I oppose this change to the northern Chichagof Island since it again singles out a single user group. I currently Own a cabin on norther Chichagof Island but am a Juneau resident. This proposed change would limit my access to deer hunting at my cabin which I have invested heavily in over the past 5 years to use as a place to hunt. For me, the area is difficult to access from Juneau due to weather and distance, over 2hrs. Again if you look at hunting records, I believe you would find Juneau residences have a limited impact on the overall harvest on Norther Chichagof Island.

WP22-09

I oppose this change in regulations for closing deer hunting in Lisianski Inlet. This area is also very remote and very difficult for non-subsistence hunters, Juneau residence, to access. Hunting records should show that this area is seldomly access from Juneau this time of year due to weather so this proposal will have little effect on competition. The only residences this change will effect are from Juneau since access is limited to Pelican and Elfin Cove.

In general I believe instating restrictions that only effect one group is a poor decision that becomes a slippery slope for other communities to make similar requests. Pretty soon, Juneau would have very limited hunting locations in a National Forest that is supposed to be managed for all user groups. If subsistence user groups are having difficulty harvesting deer, maybe that's an indication that the bag limits for all groups are to high and a better proposal would be to limit all harvest verses a single user group that has low impact on all three proposed areas. Another option would be to limit the ability to proxy hunt. I know fishermen can go out and

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

get to these remote places in the winter and shoot more deer than their limit due to proxy hunting. I understand the need for it in certain instances, but maybe limiting the number of proxy tags allowed to hunt at one time would help spread the pressure out over a longer period and less deer would be harvested. This would reduce the overall pressure and competition for sub-subsistence harvesters.

Historically these areas being proposed, as all deer habitat, is far more effected by weather and old growth timber harvests (heavy snow and large scale timber clear cuts) than the limited number of hunters. When these environmental and man-made (timber harvest) factors affect the population, all hunters are effected equally.

These proposed changes will also hurt any non-resident hunting charters that are based out of these local communities, hurting the local economies. Non-resident hunters will bring a large boost to these small communities at the end of the typical tourist season helping fortify the community with funds to weather the winter. Out of town hunters will not use Angoon based on the proposed WP22-07 since they would be very limited in hunting locations.

Thank you for taking the time to read my comments.

Mark Sams

Owner of Cabin in Freshwater Bay, Directly effected by 2 out of three of these proposed changes.

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Opposition of Federal subsistence proposals Southeast Alaska for deer WP 2207, wp2208, wp2209, wp2210, wp 2212

CHARLES SCHULTZ <cjs16@me.com>

Sun 7/18/2021 3:53 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

Cc: deanna.perry@usda.gov <deanna.perry@usda.gov>

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Attention Theo Matuskowitz,
Office of Subsistence Management

I am writing to oppose the federal subsistence proposals that affect Southeast Alaska Deer hunting. I oppose WP2207, WP22-08, WP22-09, WP22-10, and WP22-12. Proposals WP22-07, WP 22-08, WP22-09 and prevents non-qualified subsistence users from access to deer hunting on public lands. As an Alaskan resident I also rely on deer meat as a primary source of red meat that is locally available. Limiting non-qualified subsistence users from access to hunt deer in areas around Angoon, Hoonah and Pelican is entirely unfair to those who live in other areas of the state, who are non-qualified Subsistence hunters. There is no science to suggest that the over harvest of deer is related to non-qualified subsistence users, in fact I would suggest that the over harvest in the areas around Hoonah, Angoon, and Pelican may actually be from the subsistence users who may be killing every available deer seen in late season, on the beach and uncaring if the deer is antlerless and uncaring of size. Preservation of breeding antlerless deer may prove to allow fawn bearing deer an opportunity to give birth in the spring. Also education of subsistence hunters to harvest mature deer would improve the size of deer and thereby increase the available pounds of edible meat.

Extending the season in unit 6 is exactly a dichotomy of what the Subsistence Board may be wanting to achieve. The complaint of less harvestable deer will only be compounded if deer seasons are extended during their most vulnerable times. Then the subsistence deer harvest will continue to over extend the available deer to breed for next year, and likely they will complain that non-subsistence harvest is the blame.

Hunters of deer need equal access to public lands. We are all Alaskans trying to provide natural, local deer meat.

Please take the comments of non-subsistence hunters into consideration. Also consider making all Alaskans subsistence users. We all live here. We all have subsistence needs, not based on size of community we live in.

Thanks for your consideration ,
Charles Schultz
Juneau, Alaska

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/idiAAQkADZINDE2M2RRLWlWlOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAD6p...> 1/2

SCI Alaska Chapter
 Eagle River, Alaska 99577
 Cell (907) 903-8329
 Tel: (907) 980-9018
www.aksafariclub.org



July 19, 2021

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

[Electronic Submission]
subsistence@fws.gov

RE: SCI-AK comments on Wildlife Proposal 22-07 Admiralty

Dear Chairman Matuskowitz,

The Safari Club International Alaska Chapter (SCI-AK) writes in opposition to Wildlife Proposal 22-07 (WP22-07). Founded in 1971, Safari Club International is the country's leading hunter rights advocate and additionally promotes worldwide wildlife conservation. SCI-AK is nationally and internationally recognized for its contributions in support of SCT's four major mission areas: Advocacy, Conservation, Education, and Humanitarian Services.

WP22-07 is counter to our goal of ensuring fair and equitable access to game resources in Alaska. The below comments focus on the indices of deer abundance, deer hunter effort, and harvest in Alaska Game Management Unit 4 (GMU 4) as reasons to reject WP22-07.

The proposal claims that non-federally qualified users (NFQU) are unfairly competing with federally qualified users (FQU) when hunting Sitka black-tailed deer in GMU 4. WP22-07 asserts that the deer population on western Admiralty Island is depleted and that in recent years FQUs have had difficulty meeting their subsistence needs because of increasing competition from NFQUs. Alaska Department of Fish and Game (ADF&G) analysis of deer population, hunter effort, and harvest trends found no support for either contention. Instead, the available indicators support that deer remain abundant throughout GMU 4.

GMU 4 encompasses the ABC Islands (Admiralty, Baranof, and Chichagof) and the surrounding archipelago. Hunters residing in Southeast Alaska (GMUs 1-5), excluding Juneau and Ketchikan, are eligible to harvest deer in GMU 4 under federal subsistence regulations. The current federal deer season for this area is August 1 to January 31 with a bag limit of 6 deer (bucks only August 1 – September 14). The current State season is August 1 to December 31 with a bag limit of 6 deer (bucks only August 1 – September 14). In 2019, the Alaska Board of Game increased the deer bag limit in GMU 4 from 4 to 6 deer because of the GMU's uniquely healthy population of Sitka black-tailed deer.

GMU 4 consistently shows a high black-tailed population. Pellet group counts are usually well above the high-density threshold and are often double the counts in other GMUs. Aerial surveys — measured in deer/hour sighted — were conducted for two locations in GMU 4, Southern Admiralty Island (2015-2017) and Northeast Chichagof Island (2017-2018). Southern Admiralty had the highest deer/hour of any survey area in Southeast Alaska and estimates from Northeast Chichagof were similar to Prince of Wales Island (POW) and higher than all other survey areas except Southern Admiralty and POW.

Management biologists in GMU 4 began conducting beach mortality transects in the early 1990s. Although these mortality surveys are a relatively insensitive indicator of population trend, they are an indicator of mortality resulting from severe

*Safari Club International Alaska Chapter
 First for Hunters - First for Wildlife*

winters. The winter of 2006/2007 was the most severe on record, and in some parts of GMU 4 managers estimated up to 75% of deer died. Yet, based on harvest and other indicators of deer abundance, managers believe the deer population had fully recovered by the 2013 season.

GMU 4 Sitka black-tailed deer are usually above the high-density threshold and are often double the counts in other GMUs. Although the area affected by this proposal is rarely sampled, this broad index of deer abundance suggests the GMU 4 population remains at high levels with no indication of depleted populations or conservation concerns. Taken together, these indices of deer abundance — pellet group surveys, alpine counts, mortality transects — suggest this proposal cannot be based entirely on a conservation concern.

Overhunting is often used as a justification for area closures or implementation of restrictive conservation measures. ADF&G produces estimates for hunter effort and harvest using information provided by hunters. To hunt deer in Southeast Alaska all hunters must obtain harvest tickets. Since 2011 harvest tickets have come with a mandatory reporting requirement. From 1997-2019 the estimated average annual harvest in GMU 4 has been 5,725 deer taken by 3,282 hunters. GMU 4 supports the highest deer harvest in the state and the historical harvest has remained fairly stable with between 5,000-7,000 deer harvested annually. The exception being the severe winter of 2006/2007 when high harvest was followed by significant overwinter mortality of deer throughout GMU 4. This resulted in a precipitous decline in harvest from 7,900 deer in 2006 to 1,932 deer in 2007.

Long-term records indicate a declining trend in harvest for both FQUs and NFQUs. From 1997 to 2006, FQUs harvested on average 152 deer annually. Since 2013, FQUs have harvested an average of 49 deer annually. This represents an approximate 70% decline. There is a similar pattern for NFQUs, who averaged 349 deer annually from 1997-2006. Since 2013, that average has declined to 115 deer annually. SCI-AK notes hunter numbers are decreasing across the board on a national level, not just in Alaska or even GMU 4. This proposal will further restrict access for hunters and lead to a further decrease in the number of hunter's in one of the state's most viable hunting regions.

The Alaska Board of Game has also established an annual amount reasonably necessary for subsistence (ANS) for deer in GMU 4 of 5,200-6,000 deer. ANS differs from the undefined term "subsistence need" used in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Under Alaska law, ANS is the harvestable portion of a game population that is sufficient to provide a reasonable opportunity for subsistence uses. "Reasonable opportunity" is that which allows a normally diligent hunter a reasonable expectation of success. The board establishes an ANS for a game population through review of long-term population and harvest information. With deer harvest levels within the recommended ANS range, the argument that the closure needs to occur in order to benefit ANS users is moot.

SCI-AK members are especially supportive of family hunting traditions because learning to hunt starts with family and community mentors. FCU status is not inherited. Children who leave federally qualified communities to attend school elsewhere will be excluded and harmed by WP22-07. In November, many FCUs invite their family members home for peak season deer hunts. Other NFCUs return to traditional hunting areas to harvest deer on state hunting proxies or kill deer on their limit to share with family, friends, or elders. None of this use would be allowed to continue in the WP22-07 area if it is passed.

Based on the information provided to ADF&G by GMU 4 deer hunters, population indices, anecdotal reports by local hunters, and field observations by management biologists, the department has concluded that there is no conservation concern for the GMU 4 deer population. With deer population remaining high and stable, harvest within its historical range, and state ANS requirements being met it is unnecessary to restrict hunting in GMU 4 to the benefit of a small handful of users. WP22-07 will reduce the amount of deer meat coming into communities while simultaneously failing to provide conservation benefits to an already healthy deer population. SCI-AK urges you to not adopt WP22-07.

Thank you for your consideration.

John Sturgeon
SCI Alaska Chapter President
 E-mail: president@aksafariclub.org
 Cell: (907) 230-0072

Safari Club International Alaska Chapter
First for Hunters - First for Wildlife

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Wp22-08 wp22-07

isaiah Sipniewski <stansipak@gmail.com>

Thu 7/15/2021 8:09 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello,

I'm writing this email in regards to the recent proposals for restrictions on harvesting deer in the above subject line.

As a Juneau resident of 20 years I have enjoyed hunting these areas on chichicoff Island and the south end of admiralty Island.

I have a family cabin on admiralty at the southern end where dating back as far as my wife's grandfather, has used for hunting deer.

There is no decline in deer population and no reason why this area should be restricted to Juneau hunters. There are more than enough deer for those who choose to "break suction from there truck or boat seat" and hike to find deer.

I have family in hoonah who I have enjoyed staying with and hiking the mountains together. Taking my sons and teaching them how to navigate the mountains. On the road systems in hoonah I have enjoyed hiking to my favorite spots for as long as ive lived in Alaska.

I see no good reason why any of the 3 proposals should even be on the table.

If people are complaining of not enough deer it is due to their own laziness and unwillingness to hike into the woods for deer. There are more than enough for the surrounding residents and residents of Juneau.

Thank you for taking my comments into consideration.

Stanley sipniewski

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/idiAAQkADZINDE2MZRhLWlOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAN%...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] WP22-07

Scott Spickler <sspickler@gmail.com>

Mon 7/19/2021 10:21 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I would like to urge you to not take action to implement these new regulations and suggested guidelines to ban non subsistence hunters in this region.

This is the first I have heard of these proposals and feel that you have not done a good enough job publicizing these policies to allow more hunters to respond.

The fish and wildlife in Alaska belong to all of us and you are tipping the scales to a select number of hunters to the detriment of all Alaskans and where will it ever end? Is the east side of Northern Admiralty island next?

This proposal is divisive and unnecessary and should be abolished.

Thank you,

Scott Spickler
10754 Horizon Dr
Juneau, AK. 99801

Sent from my iPad

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWlOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQABH...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Subsistence Hunting Closure

Peter Strow <pstrow@hotmail.com>

Mon 7/19/2021 5:20 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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Hello,

I would like to submit a comment regarding the closure of hunting to Juneau residents for WP22-07, WP22-08 and WP22-09. I don't believe these areas should be closed to Juneau hunters. Accessible hunting is difficult in Southeast Alaska and many Juneau residents depend on hunting deer in these areas. Proposing these closures should be backed by scientific data and I think this needs to be further studied before any closures are passed.

Thank you,
Peter Strow

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWlOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAE3q...> 1/1



July 16, 2021

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

RE: Comments on WP22-07 Closure to non-Federally qualified users, Admiralty Island; WP22-08 Place a harvest restriction on non-Federally qualified users, Northeast Chichagof Controlled Use Area; WP22-09 Closure to non-Federally qualified users, Lisianski Strait; WP22-10 Lower harvest limits for non-Federally qualified users, Lisianski Strait;

Dear members of the Federal Subsistence Board:

The Sportsmen's Alliance is a leading national organization that defends the right of our members to hunt, fish and trap in all 50 states. I am writing today to urge you to use sound scientific evidence to discharge policy related to changing existing hunting seasons, harvest limits and methods and means of taking wildlife related to federal subsistence hunting and trapping and more specifically proposals WP22-07, WP22-08, WP22-09 and WP22-10.

The Sportsmen's Alliance strongly believes that if populations are abundant than all public land users in the Alaska should have access to these lands for hunting and trapping. These lands are managed and conserved using public funds contributed by sportsmen across Alaska and the United States through license fees and excise taxes paid on the purchase of firearms and other hunting equipment.

When determining whether to close certain federal lands to land users that are non-subsistence hunters, the Alliance on behalf of our Alaska members urge you to follow scientific evidence and population data to determine the best course of action. If wildlife populations numbers indicate abundant numbers of game species these lands should remain open to both subsistence hunters and non-subsistence hunters. The North American Model of Wildlife Conservation dictates that science should be the guiding tool for discharging wildlife policy and our membership stands firmly on the principles of this model.

We understand the complex nature of this decision, so we urge you to make these determinations based solely on science and not based on political or social pressure. Thank you for the opportunity to comment on this issue and thank you for your time.

Best,

Jacob Hupp
 Sportsmen's Alliance
 Associate Director of State Services

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Opposition

Luke N. Taintor <ltaintor@bartletthospital.org>

Mon 7/19/2021 2:45 PM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I oppose the new regulations on that subsistence hunters are making that drastic of an impact on the deer population numbers. The numbers don't support the claims. Thank you for your time

My house rules are be kind yourself, be kind to others, and be kind to nature. I hope you guys make the right choice.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWUOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAHga...> 1/1

7/21/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Opposition to WP22-07, WP22-08, WP22-09

Brandon Ivanowicz <blvanowicz@pndengineers.com>

Mon 7/19/2021 4:11 PM

To: AK Subsistence, FW7 <subsistence@fw.s.gov>

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Attention: Theo Matuskowitz

The intent of this email is to be on record in my opposition to the following proposals:

- WP22-07
- WP22-08
- WP22-09

I support the views of the Territorial Sportsmen, Inc. of Juneau and the Alaska Department of Fish and Game in their opposition to these proposals. Please see the attachment. Thank you. Brandon Ivanowicz.

[There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters | Territorial Sportsmen](#)

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Territorial Sportsmen

Representing the sporting lifestyle of Southeast Alaskans

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There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters!

Posted on July 17, 2021 by territorialsport in Homepage

Comments on these are due by this Monday, July 19, 2021 (email: subsistence@fws.gov or fax: 907-786-3898).

The first proposal (WP22-07) is a closure of most of west Admiralty Island September 15 – November 30 for Juneau hunters. This includes all areas south of Hawk Inlet. Here are TSI's comments opposing that proposal (& supporting ADF&G):

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-07) to close deer hunting on western Admiralty Island from September 15 to November 30 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort is also declining. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

TSI opposes this proposal and respectfully asks that it not be adopted.

7/21/2021

There are three federal subsistence wildlife proposals being considered that will affect Juneau deer hunters! - Territorial Sportsmen

The second proposal (WP22-08) reduces the bag limit from 3 to 2 deer for the Northeast Chichagof Controlled Use Area (NECCUA – Hoonah & Tenakee areas). Here are TSI's comments opposing that proposal (& supporting ADF&G):

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-08) to reduce the deer hunting bag limit to 2 deer within the Northeast Chichagof Controlled Use Area (NECCUA) for non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on in NECCUA, ADF&G increased the annual bag limit from 4 to 6 deer west of Port Frederick in 2019. Additionally, total hunting effort is relatively light for the area.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort have remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. On the east side of Port Frederick FQUs have a much more liberal bag limit of 6 deer (compared to 3 deer for NFQUs). This proposal adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

TSI opposes this proposal and respectfully asks that it not be adopted.

The third proposal (WP22-09) is a closure of Lisianski Inlet, Lisianski Strait, & Stag Bay on Chichagof Island October 15 – December 31. Here are TSI's comments opposing that proposal (& supporting ADF&G):

The Territorial Sportsmen, Inc. (TSI) of Juneau is on record opposing the proposal (Wildlife Proposal 22-09) to close deer hunting in Lisianski Inlet, Lisianski Strait, & Stag Bay on Chichagof Island from October 15 to December 31 to non-federally qualified users (NFQUs). TSI wholly supports the Alaska Department of Fish and Game's (ADF&G's) comments opposing this proposal.

TSI agrees with ADF&G's assessment that there is not a conservation concern for deer on western Admiralty Island. The deer population is currently high, abundant, and stable. Because of the abundance of deer on Admiralty Island (highest in the State), ADF&G increased the annual bag limit from 4 to 6 deer in 2019. Additionally, total hunting effort is relatively light and hunter effort/harvest have declined.

ADF&G concludes that the actual reason for the decline of federally qualified user (FQU) deer harvest is from a decline in participation & effort by FQUs, not depleted deer populations or increased NFQU competition. They found that NFQU deer hunting participation & effort has remained stable. Additionally, FQUs are allowed to hunt an additional month (January 1-31) than NFQUs, which is when the snow levels push most of the deer to the beaches. This adds unnecessary restrictions to Juneau & Ketchikan residents, as well as non-residents.

<https://territorial/sportsmen.org/there-are-three-federal-subsistence-wildlife-proposals-being-considered-that-will-affect-juneau-deer-hunters/>

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7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Federal Subsistence Management Program Wildlife Proposals

Dillon Tomaro <dillonpaultomaro@gmail.com>

Mon 7/19/2021 9:06 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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I would like to make a few opposition comments on the below listed federal subsistence deer hunting proposals

WP22-07

I oppose this proposed change to the 2022 regulations. I have been hunting south of Hawk Inlet towards and beyond Angoon my whole life and I have not witnessed any decrease in deer population other than the years following an excessive amount of snow that caused the yearlings to die. I have had nothing but pleasant encounters with the hunters of Angoon and they always seem to kill more deer than us at ease with their local knowledge (same concept that I would have a better knowledge of the landscape, and therefore the upper hand with hunting in the Barlow area). That is some of my favorite hunting territory with all of the old growth that you cannot find north of Hawk Inlet. I also enjoy hunting Florence Lake which would be affected by this proposal. Rarely do I encounter other hunters from Juneau when I am hunting South of Hawk Inlet and I believe this should be easy to see by looking at peoples hunting reports. I do not think that the Juneau residents' impact on the deer population south of Hawk inlet is significant at all and there is no way that it is hurting the Angoon residents' harvest needs. If this proposal goes through then to be fair, the Angoon residents should not be able to hunt north of Hawk Inlet (even though it is the same case that their hunting has no impact on Juneau residents deer population). There has been no problem in the past with Juneau residents affecting the Angoon residents hunting opportunity and I believe it is simply unfair to go through with this proposal.

WP22-08

I oppose this proposed change to the 2022 regulations. I believe that again the Juneau resident impact is very low in this area.

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/idiAAQkADZINDE2M2RbLWlOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAFOR...> 1/2

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

Thank you for taking the time to read my comments.

Dillon Tomaro

Lifelong Southeast Alaska Hunter

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWlOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAF0R...> 2/2

6/30/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Comment on WP22-08, WP22-09, WP22-07

John Unzicker <jmunzicker@gmail.com>

Wed 6/30/2021 8:56 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

**This email has been received from outside of DOI - Use caution before clicking on links,
opening attachments, or responding.**

Hello,

This comment is regarding the following proposals:
WP22-08, WP22-09, WP22-07

We are all Alaska state residents and have the right to utilize all of the state land regardless of our primary residence. As a lifelong Juneau resident who pays the same fees to hunt game in SE AK as anyone else in the state, I am extremely discouraged by these proposals.

Juneauites would be forced out of major hunting areas during the prime time of the season. If Juneau residents are not allowed to hunt the far, outlying areas, we will all be forced to hunt the immediate areas around Juneau which will result in over-hunting, overcrowding, and less game around Juneau. This proposal is absolutely inequitable and will divide communities.

What about hunters who have cabins or family in Hoonah, Pelican, or Angoon? This is absolutely wrong and only goes to serve a very small population of the state. Residents of Juneau have just as much right to hunt these zones as the residents of Hoonah, Pelican, and Angoon have the right to hunt anywhere in the state. There is enough wildlife and land for everyone to utilize for subsistence and it should be shared equally.

And does this mean that any other resident not from Juneau can hunt these areas? Sitka? Haines? Gustavus? Petersburg? Why only Juneau?

Thank you,
John Unzicker
2016 Glacier Bear Blvd.
Juneau, AK, 99801
907-723-3191

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/idiAAQkADZINDE2M2RbLWlOTgtNDQ1O504YjQxLWE0YzY0NW03MDNjZQAQAMTs...> 1/1

7/19/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] Public comment on WP22-07

akmac93@gmail.com <akmac93@gmail.com>

Mon 7/19/2021 8:30 AM

To: AK Subsistence, FW7 <subsistence@fws.gov>

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This email is in relation to proposal WP22-07.

I strongly feel that this proposal will greatly diminish non-subsistence use of the unit. Furthermore deer populations and animal take are both robust In the proposed area, there is ample deer for both user groups participating in the take of deer.

I Mac Wilson oppose WP22-07

Thank you for your consideration.

Sent from my iPhone

<https://outlook.office365.com/mail/subsistence@fws.gov/inbox/id/AAQkADZINDE2M2RRLWlOTgtNDQ1OS04YjQxLWE0YzY0NW03MDNjZQAQAkfs...> 1/1

7/1/2021

Mail - AK Subsistence, FW7 - Outlook

[EXTERNAL] proposals WP22-7, WP22-8 and WP22-9

Luke Woodruff <alaskan_waters@yahoo.com>

Wed 6/30/2021 9:23 PM

To: AK Subsistence, FW7 <subsistence@fw.s.gov>

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Please do not consider the new proposals WP22-7, WP22-8 and WP22-9 as new regulation. I do not believe the current deer harvest levels combined with predation/winter kills deem this kind of proposal necessary. Subsistence and non subsistence communities alike count on deer as a part of their diet along with fish, water fowl and berries. Every year is different, sometimes hunting is difficult and other times not. Let's avoid creating regulations that favor one group over another because one group thinks they are having to work harder.

Luke Woodruff
Juneau, AK

[Sent from Yahoo Mail for iPhone](#)

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