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FEDERAL SUBSISTENCE BOARD

REGULATORY MEETING

VOLUME III

LAKEFRONT ANCHORAGE HOTEL
Anchorage, Alaska
April 4, 2024

MEMBERS PRESENT:

- Rhonda Pitka, Madame Chair
- Charles Brower, Public Member
- Sara Boario, U.S. Fish and Wildlife Service
- Sarah Creachbaum, National Park Service
- Chris McKee, Bureau of Land Management
- Jolene John, Bureau of Indian Affairs
- Chad VanOrmer, U.S. Forest Service

Ken Lord, Solicitor's Office

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P R O C E E D I N G S

(Anchorage, Alaska - 4/4/2024)

(On record)

MADAME CHAIR PITKA: Good morning, everyone. Welcome to day 297 of this meeting. I'd like to welcome you all here today and thank you all for your attention yesterday. I know we went a little bit long yesterday. So today we are going to ask everybody's help in keeping their comments to about five minutes, as succinct as possible today so we can get through as much work as we can today.

I appreciate everybody's comments, so right now I would like to open -- actually, before that, if you haven't already, please turn in your votes to Ms. Kayla McKinney in the back. Kayla, can you please wave. Please vote on the Art Contest by the first break today, otherwise your vote will not count. Okay? Thank you very much for your attention on that.

Now we are at public comment period on non-agenda items. I don't have any cards in front of me. Is there anybody online?

(No comments)

MADAME CHAIR PITKA: Okay, I don't see anybody running up to the podium right now.

MS. LAVINE: For those of you online who wish to make a comment on non-agenda items, so these are items that the Board is not going to be addressing on the agenda during the meeting today. You can raise your hand by pressing star, 5. Otherwise, there will be an opportunity to provide public testimony as each agenda item is addressed by the Board.

Thanks.

MADAME CHAIR PITKA: Thank you.

Mr. Kenneth Nukwak.

MR. TULUK: Hello?

0215

1 MR. NUKWAK: I'll have the person on
2 the phone go first if I may.

3
4 MADAME CHAIR PITKA: Oh, okay. Great.
5 Robbin.

6
7 MS. LAVINE: The person who just spoke
8 if you wish to address the Board on a non-agenda item,
9 unmute yourself by pressing star, 6 and you can address
10 the Board.

11
12 Good morning. I'm calling in to
13 testify.

14
15 MADAME CHAIR PITKA: Good morning.
16 Could you please state your name for the record and
17 then go ahead.

18
19 MR. TULUK: Richard Tuluk from Chevak,
20 Alaska.

21
22 MADAME CHAIR PITKA: Yes, please go
23 ahead.

24
25 MR. TULUK: I'm calling in regards to
26 the Chevak area. Actually on the Hazen Bay and Aphrewn
27 River and the Kashunuk area. You know, those dataset
28 they've got for Kashunuk/Chevak area, what's done
29 during the time that they fish tagging for Hooper Bay a
30 long, long time ago. They did a partial study with the
31 Kashunuk River, which didn't cover the whole area of
32 where we usually fish in that area.

33
34 Anyway, the data that they used to
35 restrict our area along with the Yukon restrictions
36 it's more like a concern to us because none of our fish
37 or stocks that go up from Hazen Bay up to the Aphrewn
38 area, Manokinak area, Manokinak River, Aphrewn River.
39 None of that was -- there's no data on those to make a
40 determination of why we should be restricted along with
41 the Yukon River.

42
43 During that short fish tagging for
44 Kashunuk was not sufficient enough. They actually
45 found about two salmons up the Yukon area, around Pilot
46 Station area, I believe. So I think that restrictions
47 for the Aphrewn area and Chevak area should be
48 re-looked at and I would suggest that they do -- to
49 make it more definite that they do a fish tagging area
50

0216

1 from the Hazen Bay area and the mouth of Aphrewn River
2 and part of the upper Kashunuk River. I think that it
3 will make it more determination on where those stocks
4 of fish are going.

5

6 So I'm just calling in to make sure
7 that I provide my concern for our area. I'm a
8 subsistence user as I have been, as my grandfather and
9 my dad have always been, and it's out sustainable
10 resource that we need to try and protect.

11

12 Thank you very much.

13

14 MADAME CHAIR PITKA: Thank you very
15 much for your comment. I really appreciate that.

16

17 Okay, Kenneth.

18

19 MR. NUKWAK: Good morning. Thanks for
20 giving me this opportunity to comment on the non-agenda
21 items. I just want to start off with the
22 customary.....

23

24 MADAME CHAIR PITKA: Oh, so sorry.
25 Could you identify yourself for the record, please.

26

27 MR. NUKWAK: Kenneth Nukwak, Sr.,
28 Manokotak. On the customary and traditional use under
29 the definition it means a long established, consistent
30 pattern of use incorporating beliefs and customs which
31 have been transmitted from generation to generation.
32 So we've had this for a long time, our traditional and
33 ecological knowledge that we have.

34

35 That should be -- those information
36 should be collected from all users within the rural
37 area following the guidelines that the Board of Game,
38 Board of Fish, Federal Subsistence Board. Follow those
39 guidelines and we should be back on track as we move
40 along.

41

42 I'm just learning this process within
43 the past five to seven years. I didn't know there was
44 such a process that a law can be changed. A lengthy
45 process, but I didn't know it can be done. Whoever
46 makes a proposal just meet them with a friendly face,
47 please. Having being met with an irritable face back
48 in 2018, that was an uncomfortable but well worth the
49 experience. That was quite an experience.

50

0217

1 Anyway, I'm glad it happened that way.
2 There was no smiling faces, but now some smiles are
3 here. That wonderful. It's always great to have a
4 smiling face. Look at each other and smile at each
5 other. Maybe have a few laughs.

6
7 Whoever puts in a proposal make sure
8 there's also the IGMP put in place. With the declining
9 caribou populations statewide, I think it's a very good
10 time to start doing the Intensive Game Management Plan
11 and start studying why the decline is happening. Not
12 just look if there's any diseases, but also look at the
13 predators, the bears and the wolves. Having grew up
14 around the bears, the bears are very smart.

15
16 I was listening yesterday and I heard
17 that they are hard to survey, count their numbers on
18 the bears. (In Yup'ik). They're just like human.
19 There was a bear across from Manokotak across the
20 river. Every morning it would come out and have a
21 feast. There was a pot of old food from across the
22 Manokotak and every morning that bear would come out
23 and have a meal and then go back into the brush. Then
24 at 12:00 noon it would come out like a pattern of a
25 human being. They're very smart. That's why the
26 biologists sometimes have a hard time finding them.
27 They're inside the brush. Just need to find a way to
28 track them.

29
30 I can use an example. When me and my
31 wife were hunting last fall there was two cubs eating
32 berries and we had thought that they were alone because
33 they were two to three year old cubs and then not long
34 after the sow bear showed up looking straight at us at
35 290 yards in attack mode. They were ready to attack.
36 So I told my wife she's in attack mode. By the time I
37 was saying I think we should be heading down to the
38 boat, by the time I turned around she was already long
39 gone, my wife.

40
41 (Laughter)

42
43 MR. NUKWAK: These bears are very smart
44 animals. Even little weasels, animals like that. So
45 during the IGMP if it's put into place, possibly talk
46 with users out there and how to find them. You just
47 need to approach us and ask us what needs to be done or
48 what you guys are doing wrong. If we have the answer,
49 we'll give you the answer. If we don't have it, we
50

0218

1 don't have it. That's just a thing that we know.

2

3 Then we just need to change all the
4 wildlife proposals, the rules and regulations through
5 the system. I think that's the main point I was trying
6 to get to, the IGMP, this morning on the non-agenda
7 items.

8

9 There was a few more from Manokotak
10 that are here that have other commitments that wanted
11 to come in and do a public comment or testify. Will
12 they have the time to do that throughout the morning
13 while you guys are on other items or other agendas?

14

15 MADAME CHAIR PITKA: On non-agenda
16 items we usually open it at the beginning of the day
17 and then we'll open it again tomorrow morning.

18

19 MR. NUKWAK: Okay. That's the question
20 I had.

21

22 MADAME CHAIR PITKA: Yeah, so they
23 still have a chance tomorrow morning.

24

25 MR. NUKWAK: Okay. Thank you.

26

27 MADAME CHAIR PITKA: Thank you so much
28 and than you so much for your testimony.

29

30 MR. NUKWAK: Yes, ma'am.

31

32 MADAME CHAIR PITKA: Seeing as how
33 there's nothing else I neglected to do the roll call
34 this morning. So can you please do that, Ms. Ameer
35 Howard.

36

37 MS. HOWARD: Yes. Thank you, Madame
38 Chair. Good morning, everyone. All right. So let me
39 get my right document open.

40

41 Bureau of Indian Affairs, Jolene John.

42

43 MS. JOHN: Good morning. BIA present.

44

45 MS. HOWARD: Bureau of Land Management,
46 Chris McKee.

47

48 MR. MCKEE: BLM present.

49

50

0219

1 MS. HOWARD: Fish and Wildlife Service,
2 Jill Klein.

3

4 MS. KLEIN: Good morning. U.S. Fish and
5 Wildlife Service is present. I just wanted to mention
6 that I'm sitting in for our Regional Director this
7 morning, Sara Boario. She had mentioned that she was
8 going over to the North Pacific Fisheries Management
9 Council this morning and they started at 8:00 a.m., so
10 she is there. Thank you.

11

12 MS. HOWARD: Thank you, Jill.

13

14 National Park Service, Sarah
15 Creachbaum.

16

17 MS. CREACHBAUM: Good morning,
18 everybody. NPS is here.

19

20 MS. HOWARD: Good morning.

21

22 Forest Service, Chad VanOrmer.

23

24 MR. VANORMER: Good morning. Forest
25 Service is here.

26

27 MS. HOWARD: Good morning.

28

29 Public Member Charlie Brower.

30

31 MR. BROWER: Public member Charlie
32 Brower here.

33

34 MS. HOWARD: Good morning, Charlie.

35

36 And Public Member and Chair, Rhonda
37 Pitka.

38

39 MADAME CHAIR PITKA: Good morning. I'm
40 here.

41

42 MS. HOWARD: Thank you. Madame Chair,
43 I believe we have one other person who raised their
44 hand for public testimony. Do you want them?

45

46 MADAME CHAIR PITKA: Oh, I'm sorry. I
47 did not see the hand raised. Okay. So we'll try to
48 keep it as brief as possible. Thank you so much.

49

50

0220

1 MS. LAVINE: So the person with the
2 last four digits of 8438 you may press star, six to
3 unmute yourself.

4
5 MS. CHASE: Hello. Can you hear me?
6

7 MS. LAVINE: Yes. Hello. Can you
8 please state your name for the record.
9

10 MS. CHASE: Good morning, Rhonda. Good
11 to hear your voice. This is Melinda Chase. I'm a
12 tribal member of Anvik and a board member of Deloy Ges,
13 the ANCSA village corporation for Anvik. I serve as
14 the land manager for the corporation and also I am the
15 tribal liaison at the Alaska Climate Advocation Science
16 Center, but here representing Deloy Ges and myself. So
17 thank you for the opportunity. I'm sorry I was -- I
18 thought I had my hand raised or I did have my hand
19 raised. I appreciate the chance to give comments.
20

21 I would really like to start with the
22 request that this Federal Subsistence Board build upon
23 the urgent testimony that you heard here yesterday to
24 retain the (d)(1) protections. Also that this was put
25 forth by many Regional Advisory Councils. So I'd
26 really like to ask the Federal Subsistence Board to
27 raise the need to keep the protections in place with
28 the Secretary of Interior by sending a letter to her
29 prior to when she makes that decision in August. So I
30 think that's really critical that she hear from the
31 Board and you can build upon what people have put
32 forward here.
33

34 Anvik, which many of you probably know,
35 is within BLM Bering Sea-Western Interior Resource
36 Management Plan. Until recently, again many of you may
37 know this, the Anvik River supported the largest chum
38 salmon run in Alaska. Under that Bering Sea-Western
39 Interior our village had nominated it as an area of
40 critical environmental concern, but when the Trump
41 Administration adopted the Bering Sea-Western Interior
42 Resource Management Plan there were no areas of
43 critical environmental concern included in that plan.
44 Nothing.
45

46 So for the 62 villages that are under
47 that Bering Sea-Western Interior Resource Management
48 Plan the (d)(1) protection is the only protective
49 status that we have for our wildlife, fish and birds on
50

0221

1 our public lands, which are primarily BLM lands in that
2 area.

3

4

5 Retention of these (d)(1) protections
6 is highly significant and really critical especially
7 now that we're four years into our salmon crash and
8 we're looking at many more years of that that we're
9 shouldering. That's really important that we have
10 these (d)(1) protections on our wildlife and birds and
11 fish that we're relying on. Once they're gone, they're
12 gone for good.

13

14

15 Another point I want to raise is Alaska
16 has 50 percent of the critical minerals and right now
17 there are efforts by the Department of Energy and the
18 State to pursue these minerals, many which are being
19 stated needed for renewable transition or transition to
20 renewable energy.

21

22

23 At the same time indigenous people --
24 our indigenous people are not at the table. Some of
25 those meetings are happening at invite only. Really
26 the critical minerals that are being looked at across
27 the state many of them are going to be shouldered on
28 our traditional lands and that really means further
29 degradation, further fragmentation and more stress on
30 our fish and wildlife and really for our villages,
31 which are also going to be facing ongoing and increased
32 stress with accelerated extreme weather and climate
33 change.

34

35

36 Another point I'd like to make is that
37 BLM did have a public process and I just think they did
38 their best on a public process for these (d)(1)'s.
39 There was a massive wave of support to retain the
40 (d)(1) status on our lands. Over half of all tribes in
41 the state gave public testimony, along with
42 corporations and the public. There were 19 hearings
43 across the state. So that's really significant, their
44 effort.

45

46

47 Finally, I just want to end again with
48 that request that I started with. You, as a Board, can
49 raise this issue with the Secretary of Interior and I'm
50 requesting that you send a letter to Secretary Haaland
asking her to retain those protections prior to the
decisions she has to make in August. I think it's a
critical time to be doing that.

49

50

0222

1 So I thank you for the opportunity to
2 give this testimony.

3
4 MADAME CHAIR PITKA: Thank you very
5 much for your testimony today, Melinda. It's very nice
6 to hear your voice on the phone. So it looks like we
7 have Patricia Phillips on the phone for non-agenda
8 items.

9
10 MS. PHILLIPS: Thank you, Madame Chair.
11 This is Patricia Phillips. I live in Pelican, Alaska.
12 I'm a tribal member of Afognak Native Village. I've
13 lived in Pelican 50 years, but I was born in Sitka.

14
15 So my comment is about two Fish and
16 Game committees that I would like the Federal
17 Subsistence Board to consider requesting. It may be
18 already occurring, I'm not aware, that the OSM be
19 present at these meetings. Either OSM Staff or a
20 regional fisheries biologist. At the Joint Committee
21 of ADF&G Board of Fish and CFEC on Alaska herring
22 revitalization. The Southeast Regional Advisory
23 Council supported that federally-qualified users have a
24 specific area in the Sitka Sound area for herring.

25
26 The Sitka Tribe continues to bring
27 issues about herring to the Regional Advisory Council
28 in Southeast. So Office of Subsistence Management's
29 presence at that meeting would be -- you know, to bring
30 the subsistence -- or at least to have an ear of what's
31 going on for a resource that's very important to
32 subsistence.

33
34 The other one is I attended the
35 All-Council meeting in Anchorage and thank you very
36 much. That was a very, very
37 informative meeting. There's a Southeast Regional
38 Planning Team meeting later this month. It's in
39 Southeast Alaska. It's about comprehensive salmon
40 fisheries enhancement planning. Again, we had a
41 workshop on the effects of hatchery-produced salmon on
42 all of our resources. It has an effect throughout the
43 environment.

44
45 Anyway, that's my comment, that
46 subsistence have a presence at those meetings.

47
48 Thank you very much and thank you for
49 your service.
50

0223

1 MADAME CHAIR PITKA: Thank you very
2 much for the call in. It's nice to hear your voice
3 this morning, Patricia. So next on the phone is Chance
4 Shank.

5
6 MR. SHANK: Hi. My name is Chance
7 Shank. I am a tribal member of the village of Dot
8 Lake. It's a small village located in the Interior of
9 Alaska.

10
11 My comment today is on behalf of my
12 tribe. Before I start I just want to make sure that
13 you guys can hear me.

14
15 MADAME CHAIR PITKA: Yes, we can.
16 Please proceed. Thank you so much for your time.

17
18 MR. SHANK: Okay. Thank you. It's a
19 Federally recognized tribe located in the Interior
20 Region of Alaska. The Native Village of Dot Lake
21 submits this letter of comment in response to the
22 proposed ANCSA (d)(1) land protection withdrawal. The
23 Native Village of Dot Lake expresses our desire to the
24 proposed action Alternative A to have no land
25 protections withdrawn from the ANCSA (d)(1) land.

26
27 It was because aboriginal hunting and
28 fishing rights were extinguished through the passage of
29 the Alaska Settlement Claims Act that Congress looked
30 to the Secretary of Interior to exercise his existing
31 withdrawal authority to protect Native subsistence
32 needs and requirements.

33
34 In 1980 Congress subsequently made
35 clear the intent to protect the Alaska Native
36 subsistence priority via passage of Alaska National
37 Interest Lands Conservation Act (ANILCA). Within Title
38 VIII of ANILCA Congress specifically declared that
39 because of extinguishment of aboriginal hunting and
40 fishing rights through the passage of ANCSA Congress
41 had constitutional authority to protect and provide the
42 opportunity for continued subsistence uses on the
43 public lands by Native and non-Native rural residents.

44
45 Congress found it necessary to do so in
46 order to fulfill the policies and purposes of the
47 Alaska Native Claims Settlement Act and as a matter of
48 equity. Under the 17(d)(1) action alternatives
49 protection withdrawals would be revoked across various
50

1 numbers of acres, resulting in the finalization of land
2 selections and conveyances for the State.

3
4 On lands of State top filings and no
5 other encumbrances revocation of withdrawals would
6 allow State top filings to become effective selections.
7 On these lands rural residents would lose Federal
8 subsistence priority and instead be subject to State
9 hunting regulations. The continued maintenance of
10 subsistence traditions would depend on the continued
11 availability of subsistence resources and the continued
12 ability of subsistence users to access resources,
13 particularly if there are changes in resource
14 abundance, distribution or migration.

15
16 For thousands of years the Native
17 Village of Dot Lake has maintained stewardship over and
18 a reciprocal relationship with the lands and waters
19 that we are a part of. We depend on foods which come
20 from surrounding lands and waters as most communities
21 do in rural Alaska. Eighty-percent or more of the
22 local diet are subsistence foods. It is critical and
23 necessary for Alaskans, especially those in the rural
24 areas, to have a meaningful and effective voice in
25 management of subsistence resources on which we depend.

26
27 Subsistence is fundamentally important
28 for both food security and the cultural, economic and
29 social well-being of communities. The proposed rule is
30 consistent with this fundamental value. As Alaska
31 Native people, the practice of harvesting foods from
32 our homelands sustains us and makes it possible for us
33 to continue to exist as distinct indigenous
34 communities, practice our cultures, maintain our
35 languages, customs, traditions and relationships to our
36 lands and waters.

37
38 The Bureau of Land Management has held
39 many public hearings and there's a great majority of
40 Alaskans in favor of keeping these protections under
41 Alternative A. That's made of 140 tribes, nearly 125
42 businesses within Alaska, 15 non-profit organizations,
43 Alaska Native Regional Corporations and Federal
44 Subsistence Councils and Resource Commissions across
45 the state.

46
47 There's broad support for action
48 Alternative A and the decision will be made by the
49 Secretary of Interior by August of this year. I urge
50

0225

1 this Board to please send a letter to Secretary Deb
2 Haaland in support of keeping these protections under
3 Alternative A. Action Alternative A appropriately
4 protects the rural subsistence priority and adequately
5 protects Alaska Native communities that are most
6 affected by the other alternative action plans.

7

8 The Native Village of Dot Lake strongly
9 urges the prompt enactment of Alternative Action A.
10 Thank you.

11

12 MADAME CHAIR PITKA: Thank you so much
13 for your time this morning and testimony. I really
14 appreciate it. It doesn't look like we have anybody
15 else on the phone right now. So at this time we would
16 like to see if there's any public comment on consensus
17 agenda items. This opportunity is also available on
18 each day before we take action on the consensus items.

19

20 (No comments)

21

22 MADAME CHAIR PITKA: Okay. I don't see
23 anybody online and nobody is racing to the podium right
24 now. So we will continue and we'll also have that
25 opportunity available tomorrow. Right now we will
26 continue public testimony on WP24-04. We had a great
27 deal of written public comment and a great deal of
28 public testimony yesterday. So I think if I'm not
29 seeing anybody right now rush to the podium, we thank
30 everybody for their.....

31

32 MR. BROWER: Madame Chair.

33

34 MADAME CHAIR PITKA: Yes.

35

36 MR. BROWER: Just a question. I was
37 looking through and reading through this book. Before
38 we continue with 24-04, can I ask a question to
39 Southeast and legal advice something?

40

41 MADAME CHAIR PITKA: I guess. Go
42 ahead.

43

44 MR. BROWER: I have a question. 24-04,
45 24-05, 24-06 are all the same area, right? All
46 submitted by Southeast Council.

47

48 MR. HERNANDEZ: Thank you. It's Don
49 Hernandez, Chair of the Southeast RAC. Yes, they're

50

0226

1 all included in Unit 4 for our hunting district right.

2

3 MR. BROWER: So they're all about the
4 same but just different drainage.

5

6 MR. HERNANDEZ: They all concern the
7 same hunting unit, correct. Just different sub
8 locations, I guess, around the various communities the
9 proposals are aimed to help.

10

11 MR. BROWER: Thank you. Madame Chair,
12 a question to our legal advisor. Is it possible to
13 approve these 24-04, 05, 06 for successive block?

14

15 MADAME CHAIR PITKA: Sorry. Ken, go
16 ahead.

17

18 MR. LORD: Go ahead.

19

20 MADAME CHAIR PITKA: I was just going
21 to say no because they are different proposals. If
22 they were like very similar in nature, then we would
23 have already had them like combined on the agenda.

24

25 MR. BROWER: They seem to be very
26 similar to each other just the way I read it. I'm just
27 asking. Thank you.

28

29 MADAME CHAIR PITKA: Thank you so much,
30 Charlie. I appreciate that. Jason, do you have a
31 thought?

32

33 MR. ROBERTS: I mean they are similar
34 in what they're asking and it's all in Unit 4, but Unit
35 4 is a fairly large area and these are different
36 communities covered in each proposal. So I think
37 probably not.

38

39 MADAME CHAIR PITKA: Okay. So it's
40 different communities, but in the same Unit. Thank you
41 so much for that answer. I really appreciate that.
42 Okay. So at this time we're going to go to the
43 Regional Advisory Council recommendations. Mr. Don
44 Hernandez, thank you so much.

45

46 MR. HERNANDEZ: Thank you, Madame
47 Chair. So before I get to the Council's recommendation
48 on this first year proposal, I want to remind the Board
49 of some of the information that I gave to you in my
50

0227

1 Chair's report on the first day.

2

3

4 The justifications that the Council
5 came up with to support all three deer proposals led to
6 that position statement that I was referring to in our
7 Council Report dealing with meaningful priority and
8 other interpretations of Title VIII of ANILCA. These
9 particular wildlife proposals revisited the issue of
10 subsistence users not meeting their subsistence needs
11 with respect to harvesting deer in areas near Angoon,
12 Hoonah and Pelican.

12

13

14 The deer proposals originated in 2021
15 and this Board has rejected those proposals in the
16 past, in part citing in its justification that there
17 was no conservation concerns with the deer populations
18 in Unit 4 and that restriction for non-subsistence
19 users was not warranted.

19

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20 Since then the Council has worked
21 diligently to find a way for subsistence users in those
22 areas to have a meaningful priority to ensure that they
23 can continue their subsistence uses of this vital food
24 resource.

26 The proposals in their current form
27 came from hours of discussion and you'll note that in
28 the fall in another attempt to compromise the Council
29 made recommendations further shrinking the closed to
30 non-Federally-qualified users area as well as lessening
31 the season length. We tried to provide a meaningful
32 priority to Federally-qualified subsistence users while
33 trying to mitigate the impacts to non-Federally-
34 qualified harvesters. We heard input from our local
35 Council members and thoroughly explored how we can get
36 the Board to say yes to these proposals.

38 In addition to the revisions contained
39 in these deer proposals, and as I mentioned in my
40 Chair's report, the Council studied sections of Title
41 VIII of ANILCA, specifically section 801, 802 and 815
42 and even dived into some legislative history and some
43 case law to help understand the intent and authority.
44 That's what led to the Council's interpretation of the
45 phrases to provide meaningful priority and to
46 continuation of subsistence uses.

48 The Council is asking this Board to
49 seriously consider its interpretations of those phrases

1 and remember that subsistence uses are essential to
2 Native physical, economical, traditional and cultural
3 existence and to non-Native physical, economic,
4 traditional and social existence.

5
6 That providing the opportunity for
7 continued subsistence uses is a matter of equity
8 especially in areas suffering from high rates of food
9 insecurity. And that the increasing human population
10 of Alaska threatens subsistence uses by increasing
11 competition for subsistence resources.

12
13 That subsistence should be the priority
14 consumptive use of fish and wildlife resources on
15 public lands in Alaska. That there is a fundamental
16 difference between providing opportunity for
17 individuals to hunt and fish versus providing for
18 priority for subsistence user communities.

19
20 And that this Board can adopt or reject
21 proposals based on the existence or not of conservation
22 concerns, but it should equally consider whether
23 providing for the continuation of subsistence uses or
24 for a meaningful priority for Federally-qualified
25 subsistence users allow it to say yes for these
26 proposals.

27
28 So now to get to this particular
29 proposal, Wildlife Proposal 24-04. The Council voted
30 to support with a modification to remove Wildlife
31 Analysis Area 4041 from the proposed closure area and
32 to reduce the proposed closure period from November 1st
33 to the 15th to November 1st through the 10th.

34
35 Our justification for all three deer
36 proposals is Council took action to support the
37 continuation of subsistence uses in a manner that would
38 cause the least impact to non-Federally-qualified
39 subsistence users. This resource is important to the
40 subsistence livelihoods and lifestyles for local rural
41 residents.

42
43 The Council felt that supporting this
44 proposals with its further modification of season
45 length would provide a more meaningful subsistence
46 preference by reducing competition during a key time
47 for subsistence deer hunting. The 10-day priority
48 would improve Angoon residents' ability to access deer
49 and meet their subsistence needs efficiently and cost
50

0229

1 effectively.

2

3 The price tag for a hunting trip has
4 increased significantly and economic declines within
5 the community have forced rural residents to focus
6 their hunting strategies
7 closer to home. Local residents simply cannot afford
8 to travel far from home and spend extended periods of
9 time on unsuccessful hunts.

10

11 For the people in Angoon this proposal
12 would help them meet their subsistence needs and is
13 necessary for the continuation of subsistence uses.

14

15 Thank you.

16

17 That's our justification.

18

19 MADAME CHAIR PITKA: Thank you so much,
20 Mr. Hernandez. So at this time we have Alaska
21 Department of Fish and Game comments with the State
22 Liaison, Mr. Mulligan.

23

24 MR. MULLIGAN: Thank you, Madame Chair.
25 Before I go into the formal comments that I have
26 prepared for the meeting, you know, some things were
27 said so far and I just wanted to address those.

28

29 First we heard some uncertainty of the
30 pellet surveys that we do conduct. I would like to
31 point out that's not the only assessment tool we use.
32 You know, as in our comments, we cite the alpine summer
33 surveys we've done, the winter surveys on the beach for
34 winter kill. We also look at harvest levels to get
35 help with population levels. So it's not just one
36 thing.

37

38 If there is such a concern that this
39 body and OSM and maybe the Forest Service would like to
40 assist us in I would say getting better at our
41 assessments, we welcome that partnership.

42

43 The next thing I'm going to speak on is
44 context. A 2012 household survey was cited over the
45 concerns from Angoon residents on deer and we do not
46 doubt that, but it is from 2012. If you've read our
47 comments, you know that that population had recently
48 come out of a heavy winter kill event and deer
49 populations were still down.

50

0230

1 Second was the comments about
2 non-Federally-qualified user participation. I
3 encourage you guys to look at our table that shows the
4 past 25 years or so. Yes, if you pick a certain
5 reference point, yes, non-Federally-qualified users
6 have increased in the area, but if you look back over
7 those 25 years, if you look at the average, not a lot
8 has changed.

9
10 And if you look at the height of
11 participation from regulatory year '15 to regulatory
12 year '22, you'll notice that those numbers have almost
13 dropped by half. So, yes, I can't dispute those
14 numbers, but you need to look at those numbers in their
15 entirety across the board when judging whether
16 non-Federally-qualified user participation has
17 increased or decreased.

18
19 Now I'll go into what I've prepared.
20 The Alaska Department of Fish and Game opposes this
21 proposal as well as the other proposals for Unit 4 deer
22 restrictions. We cannot see where anything has changed
23 from when this proposal and the other Unit 4 deer
24 proposals came before you a year ago. The deer
25 population remains high.

26
27 Federally-qualified user participation
28 for the most part has remained static. Non-Federally-
29 qualified user participation has not increased in the
30 last five years and is currently below that 10-year
31 average.

32
33 Federally-qualified users harvest rates
34 and success is some of the best in the state for deer
35 and we've heard no new information during public
36 testimony that leads to any justification under ANILCA
37 for the Federal Subsistence Board to approve this
38 closure.

39
40 If enacted, this closure would
41 unnecessarily deprive non-Federally-qualified users of
42 a sustainable deer hunting opportunity contrary to
43 terms in Title VIII of ANILCA. Section .815 of ANILCA
44 authorizes Federal restrictions on non-subsistence uses
45 on public lands only if necessary for the conservation
46 of healthy populations of fish and wildlife or if
47 necessary to continue subsistence uses.

48
49 There is no conservation concern for
50

1 the Chichagof Yakobi Island deer population and none of
2 the data collected suggest Federally-qualified users
3 are having any issues harvesting deer. In fact,
4 several indices indicate deer remain abundant in the
5 area with high, efficient deer harvest. The stated
6 purpose of the proposal is to establish a meaningful
7 preference for the continuation of subsistence use of
8 deer; however, we cannot see how that is being
9 impacted.

10

11 When we look at the data provided,
12 Federally-qualified users residing in Angoon clearly
13 indicate that the decline in harvest by the community
14 results from declining participation and effort by
15 Angoon hunters. Fewer Angoon residents are
16 participating in deer hunting and those that continue
17 to hunt do so for fewer days each year.

18

19 Despite that Angoon hunters continue to
20 enjoy some of the most efficient hunting in Alaska. In
21 addition, according to reports submitted by Angoon
22 hunters, the proposed closure areas of limited
23 importance to them and in recent years has accounted
24 for less than one-quarter of the total reported deer
25 harvest.
26 Angoon residents report that they harvest most of their
27 deer in areas distant from the proposed closure area
28 where they enjoy a high rate of success.

29

30 Another reason listed in support of the
31 proposal was for public safety. Public safety is
32 addressed under 816(b), but only in reference to
33 temporary closures of public land to subsistence uses
34 for reasons of public safety. We believe that
35 provision was intended to address unusual
36 circumstances, not lawful hunting, particularly when
37 hunting pressure has been in decline for years.

38

39 Closing public land to non-Federally-
40 qualified users while leaving them open for Federally-
41 qualified users would be a misuse of that section.
42 ADF&G would note that this proposal is very similar, as
43 has been noted, to WP22-07 that was considered just at
44 your meeting on January 31st through February 3rd, 2023
45 where you voted 7 to 1 to oppose.

46

47 Within the motion that was made that we
48 voted these proposals down both conservation and
49 subsistence uses was mentioned in the proposal. To
50

0232

1 date neither the population nor harvest levels have
2 diminished when you guys first took these up. The
3 rationale still applies from the motion that was made
4 and the rationale and none of the requirements laid out
5 in ANILCA have been met for this restriction to be put
6 in place.

7

8 We know that competition has been a
9 major factor in the conversation around these
10 proposals. However, we know from testimony given at
11 the RAC meetings, we have heard from proponents that
12 and quoting from the transcripts from those meetings,
13 I'll call it competition or just the presence from
14 other hunters and going to a favorite spot and, you
15 know, seeing another boat there, it doesn't matter
16 whether they're successful hunters or not, it's just
17 the fact that they're
18 there.

19

20 Nowhere do we see in ANILCA that it
21 empowers you as a body to enact restrictions on
22 non-Federally-qualified users based solely on their
23 mere presence in an area with no measured negative
24 impact. We will also note that over this time period
25 from the proposals last time to now you have not heard
26 additional comments in support. As you see the public
27 written comments today, it was 37-1 in opposition.

28

29 My last comment I will make, and it was
30 one made by Mr. Richards from the RAC, is that we agree
31 that we would like to see how -- if you do pass this,
32 what is the metric? How are we going to know when this
33 actually can come out of closure so non-Federally-
34 qualified users will be able to hunt the areas ever
35 again give that this has the highest deer population in
36 the state and the most successful harvest rates in the
37 state.

38

39 We cannot, as the State, see how we'll
40 ever get out of this closure.

41

42 Thank you.

43

44 MADAME CHAIR PITKA: Thank you so much
45 for your comments today. I appreciate it. InterAgency
46 Staff Committee comments.

47

48 MS. LAVINE: Thank you, Madame Chair.
49 The InterAgency Staff Committee acknowledges the

50

0233

1 extensive effort made by the Southeast Alaska Regional
2 Advisory Council during both the 2022-2024 and
3 2024-2026 wildlife regulatory cycles to help Federally-
4 qualified subsistence users meet their subsistence
5 needs for deer in the Angoon area.

6
7 Deer populations in Unit 4 are the
8 highest in the state and closures are not needed for
9 conservation concerns. The Council's justification in
10 WP24-04 focuses on the closure being necessary to
11 continue subsistence uses due to competition and user
12 conflict in the areas closer to Angoon and localized
13 depletions of deer not tracked at a finer scale.

14
15 While reported harvest success by
16 Federally-qualified subsistence users appears to be
17 stable over the last decade based on quantitative
18 harvest data, Federally-qualified subsistence users in
19 the area report this data may not be tracked at a fine
20 enough scale to capture hunter effort and competition
21 that affects their ability to harvest enough deer to
22 meet their subsistence needs.

23
24 The ISC recognizes the effort that the
25 Council has put in to providing a meaningful
26 subsistence priority while trying to reduce
27 restrictions to non-Federally-qualified users as much
28 as possible. Since submission of their first proposal
29 for the 2022 regulatory cycle, the Council reduced the
30 duration of their requested closure from two and a half
31 months to 15 days to the current Council recommendation
32 of 10 days at the beginning of November and reduced the
33 requested closure area to those areas closest to home
34 and most utilized by Angoon residents.

35
36 Thank you, Madame Chair.

37
38 MADAME CHAIR PITKA: Thank you very
39 much. Now we're at Board discussion with Council
40 Chairs and the State Liaison. Okay, Board, go for it.
41 Yes, please.

42
43 MR. VANORMER: Thank you, Madame Chair.
44 This is the Forest Service. I had a comment and a
45 question for Ben with the State. I really appreciate
46 first of all you opening up and saying that you're open
47 to working on data collection as well as assessment and
48 that's where I see some of the conflict happening right
49 now when we're looking at what the State presents and
50

0234

1 what we're reading through our OSM analysis and ISC
2 work here. It's around that non-Federally-qualified
3 user trends and where those trends are going.

4
5 It's hard to formulate a question.
6 It's just more of an observation. I'm kind of
7 grappling with those two different datasets and the
8 conclusions of them. I do appreciate kind of -- and I
9 think that's where the follow up is in this proposal if
10 it is to carry forward. You mentioned metrics in terms
11 of how do we know whether this is an effective action
12 to take into the future and how does that work moving
13 forward in terms of where does it go from there.

14
15 So I don't know if you have any
16 reflections on that in terms of that data conflict that
17 I'm speaking of here.

18
19 MR. BURCH: Through the Chair, Member
20 VanOrmer. I'm going to have our regional supervisor
21 Tom Schumacher provide some observations about the
22 difference in that data and kind of the difference in
23 what we're seeing and what OSM is seeing.

24
25 MR. SCHUMACHER: For the record, this
26 is Tom Schumacher, Department of Fish and Game,
27 Division of Wildlife Conservation, Regional Supervisor
28 from Southeast Region. Through the Chair to Member
29 VanOrmer.

30
31 The period of time chosen in the OSM
32 analysis reflects a period that was during and just
33 after a series of severe winters that occurred in
34 Southeast Alaska. That period extended from 2006
35 through 2012 where we had four winters with above
36 average snowfall, including a record year when our Unit
37 4 area biologist estimated that up to 75 percent of the
38 deer in some areas died. That has a serious population
39 effect. It has an effect on hunter participation.

40
41 Although the Department did enact some
42 restrictions on Northeast Chichagof Island there were
43 no other harvest restrictions. However, hunters
44 voluntary hunted that period and that period I'm
45 talking about is the period that OSM chose for
46 analysis. So it showed a decline of hunter
47 participation, particularly hunters from non-Federally-
48 qualified communities.

49
50

0235

1 As the deer population rebounded, which
2 took several years, the Department considered it fully
3 recovered by year 2013. Hunter effort from all
4 communities, rural and nonrural, recovered. So by only
5 analyzing the period during this low population and
6 resulting severe winters in contrast to the period that
7 followed really doesn't capture what is normal.

8

9 What the Department did in our analysis
10 is look back an entire 25 years and what the reasons
11 were for the differing conclusions in our analysis and
12 OSM's is that we had looked at a normal period compared
13 to a normal period, not the period affected by the
14 severe winter.

15

16 Our analysis showed exactly what's
17 going on. That is that things are pretty much the same
18 now as they were 25 years ago in Angoon. Hunter
19 harvest, hunter participation is going down, but it's
20 almost entirely a reflection of a declining population
21 in that community. I would suggest also an aging
22 population in that community. It is not due to
23 competition with non-rural residents.

24

25 MADAME CHAIR PITKA: Thank you very
26 much for the answer. I appreciate it. Does anybody
27 else have any further questions of the Regional
28 Advisory Council or the State?

29

30 Go ahead, Mr. Hernandez.

31

32 MR. HERNANDEZ: Thank you, Madame
33 Chair. Don Hernandez for the Southeast RAC. I do want
34 to question one of the statements that the State has
35 made here. They're putting forward the notion that
36 this is kind of unprecedented and there is no
37 provisions in ANILCA to deal with competition and
38 that's a little bit misleading or not true.

39

40 I want to direct you to an agenda item
41 that you're going to have later on in this meeting that
42 deals with the sheep hunt in Unit 24A, which is the
43 area that one of our elders gave a lot of testimony on
44 yesterday morning about the Red Sheep Creek area.
45 You're going to have a closure review on a proposal
46 there.

47

48 I'll just read from the book here. It
49 says in 2012 the Board re-established the closure to
50

0236

1 sheep hunting by non-federally-qualified users in the
2 Cane and Red Sheep Creek drainages during fall because
3 while the Board said there was no conservation concern,
4 the closure was needed to ensure the continuation of
5 traditional subsistence uses of sheep by Arctic Village
6 hunters.

7

8 So there is definitely precedent for
9 instituting a closure to continue subsistence uses.
10 This is not a new issue. So I just wanted to point
11 that out.

12

13 MADAME CHAIR PITKA: Thank you very
14 much, Mr. Hernandez. I appreciate that. Lisa
15 Grediagin. So under Table 8 in our Board book on Page
16 519 can you provide some clarity on what the State said
17 about the years that we chose to analyze for OSM?

18

19 MS. GREDIAGIN: Thanks. I'm going to
20 defer that to.....

21

22 MADAME CHAIR PITKA: Either one.

23

24 MS. GREDIAGIN:the analyst,
25 Jason. Thanks.

26

27 MR. ROBERTS: So I just want to make a
28 note that if you look at Table 8 on Page 519 the years
29 that were analyzed range from 2000 to 2021 and this is
30 the data we received from the State. So we make some
31 comparisons between different years in this analysis,
32 but overall we're looking at both the averages from
33 2000 to 2021 as well as differences in shorter
34 timeframes within these years. So I don't think it's
35 accurate to say we only analyzed 2006 to 2012.

36

37 MADAME CHAIR PITKA: Thank you very
38 much for that clarification. I appreciate it. Board
39 discussion. Does anybody else have any other
40 questions? Go ahead, Jill.

41

42 MS. KLEIN: This is Jill Klein with the
43 Forest Service. I just had a question just
44 procedurally if the Board adopted this as the 10-day
45 period as a -- would that be a closure? Would that be
46 part of a closure review cycle or not?

47

48 MR. ROBERTS: Through the Chair. Yes,
49 all closures are required to be reviewed at least once
50

0237

1 every four years.

2

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MADAME CHAIR PITKA: Okay. Does anybody else have any other questions, comments, discussion? I see somebody's hand up. Sorry, Mr. Mulligan.

MR. MULLIGAN: Thank you, Madame Chair. We, as the State, don't deny that competition is a factor under ANILCA. We were just saying under the conditions for Unit 4 where we can't see how that is being met. To compare it to Red Sheep Creek is apples and oranges. Sheep populations and sheep dynamics are not the same. I will note that we did oppose that closure as well.

MADAME CHAIR PITKA: Thank you. I noted it. I'm really looking around the room right now. Any other hands raised, Board discussion? Sometimes I have a blind spot. If not, then we'll go to a Board motion.

MR. VANORMER: Madame Chair.

MADAME CHAIR PITKA: Yes. Thank you so much.

MR. VANORMER: Madame Chair. Forest Service, Chad VanOrmer. I'll make the motion. Madame Chair, I move to adopt WP24-04 with the RAC modification to close deer hunting to non-Federally-qualified users from November 1st through the 10th and remove wildlife analysis area 4041 from the proposed closure area in deference to the Southeast Alaska Subsistence Regional Advisory Council.

Following a second, I'll explain why I intend to support my motion.

MR. BROWER: Second by Public Member Charlie.

MR. VANORMER: Thank you. The Forest Service acknowledges the importance of the subsistence way of life to rural residents living in Angoon. I believe there is ample evidence in the record, including the OSM Staff analysis and in the Southeast RAC's recommendation that sport hunting is having a negative impact on subsistence uses, particularly

0238

1 Angoon residents' ability to continue their subsistence
2 uses of deer. This is a valid reason to adopt a
3 closure.

4

5 The Federal Subsistence Program has
6 always relied on traditional ecological knowledge and
7 the testimony of rural subsistence users in addition to
8 biological or harvest data. I'm heavily weighing the
9 testimony and evidence in the record from local
10 subsistence users, including the Council member from
11 Angoon and the Southeast RAC Chairman, which I find to
12 be credible and firmly rooted in local and traditional
13 knowledge.

14

15 Specifically the Board has heard from
16 local users about their difficulty harvesting deer to
17 outside pressures and increased competition for time
18 and space and the effects on their ability to engage in
19 their subsistence uses.

20

21 Local testimony indicates that sport
22 hunting is seriously affecting the effort and success
23 rate of subsistence hunts such as by preventing locals
24 from accessing preferred hunting locations or by
25 localized depletion of deer.

26

27 Quantitative data also supports the
28 testimony about increased competition. I'm going to
29 talk a little bit about how we're defining
30 competition. It's not really necessarily that two
31 hunters are scoping in on the same deer necessarily,
32 but we're really talking about the presence and
33 activities of non-Federally-qualified users and their
34 impact on the effort of rural subsistence hunting.

35

36 For example the number of days hunted
37 by non-Federally-qualified users in the proposed area
38 has increased substantially over the past 10 years,
39 indicating an increase in competition for the
40 opportunity to hunt deer in the proposal area.

41

42 In short, traditional ecological
43 knowledge provided by the Federally-qualified
44 subsistence users documents the outside pressures from
45 an increasing human population, increasing competition
46 for resources and more efficient hunting technology are
47 affecting rural subsistence users' ability to continue
48 engaging in subsistence uses.

49

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1 For these reasons the Southeast
2 Regional Advisory Council proposed WP24-04 to support
3 the continuation of subsistence uses while minimizing
4 the impact to non-Federally-qualified users with a very
5 targeted closure. Specifically, Wildlife Proposal
6 WP24-04 would improve access to nearby subsistence
7 resources by reducing competition for limited access
8 points, making it more efficient and economical for
9 people living in Angoon to meet their subsistence needs
10 and thus provide for the continuation of subsistence
11 uses.

12
13 I recognize that the Board previously
14 rejected a somewhat similar proposal in 2023. However,
15 the current proposal is much narrower and will have
16 limited impacts on non-Federally-qualified users.
17 Adopting the closure strikes a reasonable balance
18 between allowing Angoon residents to continue their
19 subsistence uses while also minimally affecting
20 non-Federally-qualified users.

21
22 The closure is especially critical
23 because of the importance of the proposal area to local
24 residents, many of whom may not be able to afford to
25 travel far from home or spend long periods of time
26 unsuccessfully hunting deer. The fact that those most
27 dependent on the resource are reporting difficulty
28 harvesting deer justifies taking action.

29
30 In conclusion, the Forest Service
31 supports WP24-04 with the RAC modification to help the
32 residents of Angoon to continue their subsistence way
33 of life, meet their subsistence needs and continue with
34 their subsistence uses of deer.

35
36 Thank you, Madame Chair.

37
38 MADAME CHAIR PITKA: Thank you very
39 much. So we're under Board discussion at this point.
40 I don't see any hands. If anybody has any questions,
41 now is the time.

42
43 (No comments)

44
45 MR. BROWER: Question.

46
47 MADAME CHAIR PITKA: Thank you so much.
48 Can we have a roll call vote, please.

49
50

0240

1 MS. HOWARD: Absolutely. Thank you,
2 Madame Chair. We'll start with the maker of the
3 motion. U.S. Forest Service, Chad VanOrmer.

4
5 MR. VANORMER: U.S. Forest Service
6 supports.

7
8 MS. HOWARD: Thank you.
9
10 Bureau of Indian Affairs, Jolene John.

11
12 MS. JOHN: The Bureau of Indian Affairs
13 votes in support to adopt the Southeast RAC
14 recommendations with the RAC modifications. Rural
15 users have been experiencing difficulties with meeting
16 their subsistence deer needs in this portion of Unit 4,
17 citing increased competition from non-local hunters as
18 a primary reason.

19
20 Areas recommended for closure in the
21 Southeast RAC modifications are those most used by
22 local residents. RAC recommendations are supported by
23 substantial evidence, including extensive public
24 testimony from affected rural residents are important
25 and are necessary for the satisfaction of subsistence
26 needs as per Section .805(c).

27
28 MS. HOWARD: Thank you, Member John.

29
30 Bureau of Land Management, Chris McKee.

31
32 MR. MCKEE: BLM moves to adopt WP24-04
33 as modified by the Southeast Alaska Subsistence
34 Regional Advisory Council. Deer continue to be one of
35 the most important subsistence foods for the residents
36 of Angoon. Recent declines in other food sources make
37 deer an even more critical resource for rural residents
38 of the area.

39
40 Local residents have reported increased
41 competition with outside hunters and that a limited
42 closure to non-Federally-qualified users is needed to
43 ensure continuation of subsistence uses of the deer
44 resource as outlined in ANILCA Section .815(3). The
45 modification proposed by the Southeast RAC will provide
46 a meaningful subsistence preference for rural residents
47 by minimizing the impact to non-Federally-qualified
48 users who hunt in the area.

49
50

0241

1 I would also note that the Board's own
2 policy closure, should the Board adopt this, would be
3 subject to closure review. Their own policy states
4 when a closure is no longer needed the Board will
5 reopen the affected Federal public lands and waters as
6 soon as practical. So this will be going under review
7 and it's on the periodic basis under those
8 circumstances.

9

10 Thank you, Madame Chair.

11

12 MADAM CHAIR PITKA: Thank you very

13 much.

14

15 MS. HOWARD: Fish and Wildlife Service,
16 Jill Klein.

17

18 MS. KLEIN: The Service votes to
19 support as modified by the Southeast Regional Advisory
20 Council. The Service has heard how important deer are
21 to local subsistence users and our decision to support
22 as modified is based on the justification in the OSM
23 analysis related to non-local hunters coming into the
24 Angoon area, which are creating challenging
25 circumstances and impacting Angoon's ability to
26 continue their subsistence uses of deer.

27

28 So, again, based on the OSM
29 justification, the substantive points made by the
30 Forest Service and in deference to the Southeast
31 Council we support the Council's modification for a
32 meaningful priority for subsistence uses.

33

34 Thank you.

35

36 MADAME CHAIR PITKA: Thank you very

37 much.

38

39 MS. HOWARD: National Park Service,
40 Sarah Creachbaum.

41

42 MS. CREACHBAUM: Thank you, Madame
43 Chair. The National Park Service supports WP24-04 with
44 the Southeast RAC modification for the reasons stated
45 by the Forest Service. The Council's justification for
46 submitting WP24-04 focuses on the closure being
47 necessary to continue subsistence uses due to
48 competition and user conflict in the areas closer to
49 Angoon.

50

0242

1 Federally-qualified subsistence users
2 in the area report that local hunter effort is
3 underestimated by the harvest data and do not capture
4 competition that affects their ability to harvest
5 enough deer to meet their subsistence needs.

6
7 The analysis indicates there's
8 qualitative and quantitative data that supports
9 residents' claims that competition with non-locals has
10 been threatening the continuation of subsistence uses
11 of deer and that a limited closure to non-Federally-
12 qualified users is necessary to continue these uses per
13 Section .815(3) of ANILCA.

14
15 I'd like to recognize the effort the
16 Council has put in to providing a meaningful
17 subsistence priority while trying to reduce to the best
18 of their ability restriction on non-Federally-qualified
19 users as much as possible.

20
21 Notably, since submission of their
22 first proposal for the 2022 regulatory cycle, the
23 Council greatly reduced the duration of the requested
24 closure to the current Council's recommendation of 10
25 days at the beginning of November and reduce the
26 requested closure area to those areas closest to home
27 and most utilized by Angoon residents.

28
29 This will provide for a meaningful
30 subsistence priority in the time and area where
31 subsistence hunting effort is most concentrated while
32 minimizing impacts to non-Federally-qualified
33 subsistence users.

34
35 Thank you.

36
37 MADAME CHAIR PITKA: Thank you very
38 much.

39
40 MS. HOWARD: Public Member Charlie
41 Brower.

42
43 MR. BROWER: Move to support with
44 Southeast Subsistence Regional Council recommendation
45 with modification.

46
47 MS. HOWARD: Thank you. Member Brower,
48 you have Tony Christianson's proxy.

49
50

0243

1 MR. BROWER: Support for the same
2 reason.

3
4 MS. HOWARD: Thank you. Then Chair
5 Rhonda Pitka.

6
7 MADAME CHAIR PITKA: I vote to support
8 as modified by the Southeast Regional Advisory Council.
9 The justification in the OSM analysis on Page 523 of
10 the Board book. Also I really appreciate the Southeast
11 Regional Advisory Council's working together to make
12 sure that there's a meaningful subsistence priority
13 provided to the people of the region.

14
15 Thank you.

16
17 MS. HOWARD: Thank you, Madame Chair.
18 The motion passes unanimously.

19
20 MADAME CHAIR PITKA: Thank you very
21 much. So at this time I'd like to call for a short
22 break until 10:30 a.m. Then we will come back with
23 WP24-05. We are going to attempt to get all the way
24 through to 24-20 today. So we will be mindful of this
25 and help each other along the way with our testimonies.
26 The Wildlife Closure Review.

27
28 Thank you.

29
30 (Off record)

31
32 (On record)

33
34 MADAME CHAIR PITKA: Thank you very
35 much. Can everybody please take your seats and we'll
36 be moving on to WP24-05 Unit 4 deer.

37
38 MR. ROBERTS: Hello again, Madame
39 Chair. Members of the Board. Council Chairs. My name
40 is Jason Roberts. I'm an anthropologist at OSM and
41 I'll be presenting a summary of the analysis for
42 Wildlife Proposal 24-05. The analysis for this
43 proposal begins on Page 629 of your meeting book.

44
45 Proposal 24-05 was submitted by the
46 Southeast Council. The proponents are requesting to
47 close the Federal public lands of the Northeast
48 Chichagof Controlled Use Area to deer hunting by
49 non-Federally-qualified users from November 1 through
50

1 November 15th. This proposal area corresponds to a
2 number of wildlife analysis areas that you can see in
3 Figures 1 and 2 on Pages 634 and 635 of your meeting
4 book.

5
6 The proponents note that they submitted
7 WP24-05 to establish a meaningful preference for the
8 continuation of subsistence uses of deer by Federally-
9 qualified users in the Hoonah area. Hoonah residents
10 depend on deer as a key component of their subsistence
11 way of life. However, the proponents assert that
12 residents in the area have been experiencing
13 difficulties harvesting enough deer to meet their
14 subsistence needs because of increasing competition and
15 user conflicts with non-Federally-qualified users.

16
17 The road network around Hoonah and its
18 relative ease of access via the ferry system has made
19 it a popular hunting location for non-Federally-
20 qualified users and other hunters from outside the
21 area. This has led to access and overcrowding issues,
22 increasing hunting competition and hunter safety
23 concerns.

24
25 The proponents assert the requested
26 15-day closure would allow for the continuation of
27 subsistence uses and provide a meaningful subsistence
28 preference by enhancing opportunity for subsistence
29 users and helping them meet their subsistence needs by
30 reducing hunting competition and improving access to
31 hunting areas during the most important time of the
32 year for subsistence hunting.

33
34 Looking at just a brief bit of the
35 regulatory history. In 2022 the Southeast Council
36 submitted Proposal 22-08 requesting that the annual
37 deer harvest limit for non-Federally-qualified users
38 hunting in the Northeast Chichagof Controlled Use Area
39 be reduced to two male deer. This proposal was
40 motivated by conservation concerns for the deer
41 population.

42
43 WP22-08 was rejected by the Board at
44 its February 2023 regulatory meeting. The stated
45 justification was that the available data on deer
46 populations in Unit 4 did not meet the criteria
47 required to close land or implement harvest
48 restrictions as there were no conservation concerns.

1 It was also noted that the proposed
2 harvest limit reductions for non-Federally-qualified
3 users wouldn't be capable of providing a meaningful
4 conservation benefit or substantially improving the
5 success rate of Federally-qualified users as recently
6 reported data showed that few non-Federally-qualified
7 users harvested more than two deer per year in the
8 area; however, the Board member from the Bureau of
9 Indian Affairs dissented for reasons discussed in the
10 previous analysis.

11
12 The current Proposal WP24-05 is similar
13 to 22-08 in that it requests a change to deer hunting
14 regulations for non-Federally-qualified users in the
15 Northeast Chichagof Controlled Use Area. However,
16 WP24-05 requests a 15-day closure to deer hunting by
17 non-Federally-qualified users instead of a harvest
18 limit reduction. WP24-05 is motivated by concerns over
19 the high levels of competition from non-local hunters
20 posing a threat to the continuation of subsistence uses
21 for Federally-qualified users.

22
23 At their fall 2023 meeting the
24 Southeast Council voted to support WP24-05 with
25 modification to remove the Tenakee Inlet and Mud Bay
26 areas from the proposed closure area and reduce the
27 closure period from November 1 to 15 to November 1 to
28 the 10th.

29
30 Deer have been a key subsistence
31 resource utilized by Hoonah residents and residents of
32 other nearby communities for many years and generally
33 represent the most significant terrestrial source of
34 meat for rural residents of Southeast Alaska.
35 Subsistence studies conducted by ADF&G in these
36 communities deer have consistently ranked as a primary
37 resource in terms of bulk contribution to subsistence,
38 at times trailing only salmon, non-salmon fish and/or
39 berries.

40
41 However, ADF&G researchers noted that
42 between 1996 and 2012 per capita harvests of most
43 subsistence resource categories generally declined
44 except for non-salmon fish and vegetation. This could
45 be an indication of a decline in the available
46 populations of key subsistence resource species like
47 salmon and deer, increasing competition for such
48 species and/or changing methods and capabilities of
49 harvest.

1 The trends of declining per capita deer
2 harvest continued in Hoonah in 2016. Before logging
3 roads were constructed Hoonah residents accessed deer
4 hunting areas almost exclusively by foot or by boat and
5 hunting by non-locals was pretty limited. After 1980
6 the newly constructed logging roads became the main
7 means of accessing deer hunting locations and the
8 Hoonah Road system gained the reputation of being a
9 relatively inexpensive and productive place to hunt
10 deer for both locals and non-locals.

11
12 Since that time reports of increasing
13 hunting competition and localized depletions of deer
14 have been common in the area since this period of
15 logging and road construction. In 1986 ADF&G
16 researchers observed Hoonah hunters having difficulty
17 harvesting deer in some parts of Hoonah's core harvest
18 area.

19
20 Hoonah residents who were successfully
21 harvesting deer had abandoned areas near roads as
22 competition from other hunters had significantly
23 increased in these areas. Similar issues were
24 documented in subsistence studies and/or Southeast
25 Council testimonies in 2009, 2010, 2012 and 2021.

26
27 ADF&G researchers noted in 2012 the
28 issue of how many deer are taken by non-local hunters
29 was a concern due to the effects as on local hunters as
30 with simply the number of hunters out hunting making
31 local areas and roads too crowded to hunt. As fuel
32 costs put greater pressure on subsistence hunters to be
33 successful, there were a number of suggestions for
34 better monitoring of non-local hunters as well as
35 reducing the number of non-local deer hunters in the
36 Hoonah area.

37
38 Like Angoon the decline of the
39 commercial fishing industry and associated loss of
40 income in the area has combined with rising fuel prices
41 to significantly impact subsistence harvesting
42 strategies of many Hoonah residents. Subsistence
43 studies conducted by ADF&G and Hoonah in 2012
44 demonstrated a substantial reduction in the harvest
45 area utilized by residents here since 1996. This
46 reduction in harvest area has likely heightened the
47 impact of competition closer to home.

48
49 Competition was the most frequently
50

0247

1 reported issue of concern for respondents in the
2 results of a small sample survey conducted in the
3 Hoonah area by the Hoonah Indian Association from 2022
4 to 2023. I should note that it was a pretty small
5 sample, 19 respondents.

6
7 In this survey competition was noted as
8 having a substantial impact on deer abundance, access
9 to preferred hunting areas and the general difficulty
10 of hunting in the Hoonah area. Likewise, during the
11 previous wildlife cycle 95 Hoonah community members
12 signed and submitted a petition to the Office of
13 Subsistence Management that supported WP22-08.

14
15 Hoonah, like Angoon, hoped switching
16 strategies would help compensate for insufficient
17 harvest of a primary resource like deer are complicated
18 by policy restrictions, ongoing declines and other
19 subsistence resources and increasingly unpredictable
20 and severe weather patterns.

21
22 During the most recently published
23 subsistence study conducted by ADF&G in 2012
24 approximately 31 percent of the households in Hoonah
25 were considered to be experiencing low or very low food
26 security. Food insecure conditions tended to increase
27 during the winter months in Hoonah with a lack of
28 subsistence foods being the greatest contributor to
29 food in secure conditions. Deer was the subsistence
30 resource that Hoonah households most reported needing
31 more of during this study.

32
33 Proximity to Hoonah appears to be a key
34 factor for residents when selecting deer hunting
35 locations from 2000 to 2021 approximately 80 percent of
36 Hoonah residents reported deer harvest and 79 percent
37 of their reported hunting days took place within the
38 wildlife analysis areas covered by this proposal.

39
40 However a relatively small amount of
41 hunting and harvest took place in the Tenakee Inlet and
42 Mud Bay portions of the proposal area. The location of
43 about 18 percent of the total harvest and 19 percent of
44 the hunting days reported by Hoonah residents also
45 could not be determined from the information returned
46 and is unknown. It's possible that some of that
47 harvest and hunting effort took place in the proposal
48 area.

49
50

0248

1 Based on the reported data, an average
2 of approximately 568 users hunted for 2,017 days,
3 harvesting a total of 693 deer within the proposal area
4 each year from 2000 to 2021. Most years Federally-
5 qualified subsistence users harvested more deer from
6 the proposal area each year due to the larger number of
7 hunters.

8
9 On average, roughly 42 percent of all
10 reported hunters utilizing the proposal area were
11 Hoonah residents. Other Federally-qualified
12 subsistence users accounted for 13 percent of the total
13 while non-Federally-qualified users accounted for
14 approximately 45 percent of all hunters utilizing the
15 proposal area during this period. The available yearly
16 data on hunter days and harvests in the proposal area
17 showed similar trends.

18
19 It's important to note that the
20 proportion of non-Federally-qualified user hunter
21 effort and harvest in the proposal area increased
22 fairly substantially between 2011 and 2020. From 2016
23 to 2020 during this reporting period non-Federally-
24 qualified users accounted for an average of 54 percent
25 of all reported hunters, 67 percent of all reported
26 hunting days and 50 percent of all reported harvest
27 taken from the proposal area.

28
29 Perhaps most importantly the average
30 yearly number of hunter days reported by non-Federally-
31 qualified users in the proposal area increased
32 approximately 34 percent between 2001 to 2010 and 2011
33 to 2020. This does suggest that competition from
34 non-Federally-qualified users in the proposal area has
35 increased.

36
37 The OSM conclusion is to support
38 WP24-05 with modification and our modification is a bit
39 different than the Council's modification. Reducing
40 the size of the proposed closure area and you can see
41 that description and proposal area on Pages 667 and
42 669. And reducing the period of closure to November 1
43 through the 10th.

44
45 The justification is that deer have
46 consistently ranked as one of the most important
47 subsistence resources harvested by Hoonah resident in
48 previous subsistence studies. However, reports of
49 substantial hunter competition and localized depletions
50

1 of deer have been common in the Hoonah area since the
2 most recent period of logging and road construction.

3
4 Per capita deer harvests by Hoonah
5 residents have also been in decline since the 1990s.
6 Hoonah households reported substantial levels of food
7 insecurity during the most recent subsistence study
8 conducted by ADF&G, and deer were the subsistence
9 resource that Hoonah households most reported needing
10 more of during this time.

11
12 Reported simultaneous declines in other
13 key subsistence resources, changing weather patterns,
14 economic declines coupled with rising fuel costs and
15 policy restrictions make it difficult to effectively
16 compensate for the impacts of high levels of
17 competition for deer in the proposal area.

18
19 There is qualitative and quantitative
20 data that supports residents claim that competition
21 with non-locals has been threatening the continuation
22 of subsistence uses of deer and that a limited closure
23 to non-Federally-qualified users is necessary to
24 continue these uses.

25
26 Hoonah residents have noted that
27 because of declines in the commercial fishing industry
28 and losses in income they've had to change their deer
29 hunting methods to focus their efforts closer to home,
30 as it has become too expensive to travel further
31 without the necessary fuel or equipment. This issue has
32 also been documented in the most recently reported
33 subsistence study conducted by ADF&G researchers in
34 Hoonah.

35
36 Residents have noted that the high
37 numbers of non-local hunters utilizing the Hoonah road
38 system are causing competition issues, which
39 substantially impact residents' harvesting capabilities
40 and that this issue is particularly problematic during
41 the rut.

42
43 Residents have also noted localized
44 depletions of deer within the core subsistence
45 harvesting area around Hoonah and that deer populations
46 within Unit 4 may not be tracked at a fine enough scale
47 to consistently capture the impacts of this issue.

48
49 Residents have also explained that
50

0250

1 their recent difficulties in harvesting deer are not
2 well represented in the quantitative data collected on
3 deer harvests, hunter effort and hunter success rates.
4 They note that hunter effort and harvest reporting tend
5 to underestimate the amount of hunting effort taking
6 place and overestimate success rates.

7

8 The OSM modification would increase
9 subsistence harvest opportunity for Federally-qualified
10 users in the Hoonah area by allowing for a ten-day
11 period where residents could hunt in their most heavily
12 utilized areas closest to home, during a period of time
13 very important for local harvesters.

14

15 The OSM modification reduces the size
16 of the proposed closure area to focus on those areas
17 along the Hoonah road system. These are the areas
18 closest to Hoonah that are most heavily utilized by
19 residents, as shown in the Hoonah harvest and effort
20 data in Table 9 and the deer hunting locations reported
21 to ADF&G researchers shown in Figure 4.

22

23

24 Under the OSM modification
25 non-Federally-qualified users would maintain the
26 ability to hunt within the entire section of the
27 Northeast Chichagof Controlled Use Area north of Port
28 Frederick as well as the Tenakee Inlet area during the
29 proposed ten-day closure. Excluding these areas from
30 the proposed closure area seems appropriate because
31 they do not appear to be as essential to Hoonah
32 residents deer hunting efforts as those areas along the
33 road system closer to Hoonah.

34

35 This modification would also reduce the
36 size of the proposed closure area and thereby reduce
37 the impact on Federally-qualified users. Reducing the
38 closure period would also reduce the impact on
39 non-Federally-qualified users.

40

41 That concludes my presentation and I
42 can take any questions.

43

44 MADAME CHAIR PITKA: Thank you very
45 much. Board questions right now.

46

47 (No comments)

48

49 MADAME CHAIR PITKA: Okay. Thank you.

50

0251

1 It doesn't look like we have any Board questions. I
2 appreciate the analysis. Right now we're going to a
3 summary of the written public comments.

4
5 MR. ROBERTS: Through the Chair. OSM
6 received a total of 39 written public comments on this
7 proposal during the initial public comment period and
8 we've been receiving more comments throughout this
9 meeting that I'm sure you've had a chance to look at
10 too.

11
12 These comments can be found starting on
13 Page 699 of your meeting book. One comment was
14 submitted in support of the proposal. The commenter
15 noted that subsistence hunting and fishing are subject
16 to disproportionate levels of regulation and scrutiny.
17 The commenter thought that this proposal was an
18 innovative way to not only support but to prioritize
19 subsistence users' household needs and invest in local
20 food security.

21
22 Thirty-eight comments were submitted in
23 opposition. These commenters noted that ADF&G data
24 shows there are no conservation concerns regarding deer
25 populations in the area as the populations are
26 generally healthy and the level of competition for deer
27 in the area does not warrant a closure.

28
29 The commenters note the primary issue
30 impacting deer hunting recently has been the impact of
31 warmer winter weather that has not produced as much
32 snow particularly early in the season. This lack of
33 snow means that deer are not being pushed down to the
34 beaches where they can be more easily harvested via the
35 beach hunting methods favored by many locals.

36
37 They also state that this proposal
38 would restrict the rights of long-term seasonal
39 residents and others with local ties to the area to
40 hunt deer, enjoy the beauty of the area and share and
41 pass down cultural traditions with family and friends.
42 The commenters also note that this proposal does not
43 consider the impact of other Federally-qualified
44 users.

45
46 MADAME CHAIR PITKA: Thank you very
47 much. We've also received -- I haven't kept count of
48 how many comments that we've received so far online
49 during this meeting. They'll be added to the record,
50

0252

1 right, at the end? The administrative record.

2

3 MR. ROBERTS: Yes.

4

5 MADAME CHAIR PITKA: Thank you very
6 much for that. So right now we would go to the summary
7 of tribal and ANCSA corporation consultation.

8

9 MR. LIND: Good morning, Madame Chair.
10 Board members, RAC members. I will keep it very brief.
11 During November 14 consultation session we did not have
12 any questions or comments on WP24-05. Thank you,
13 Madame Chair.

14

15 MADAME CHAIR PITKA: Thank you very
16 much. We also didn't receive any public comment during
17 the opening tribal consultation to this, correct?

18

19 MR. LIND: (Nods affirmatively)

20

21 MADAME CHAIR PITKA: Okay. Thank you
22 so much.

23

24 MR. LIND: That is correct.

25

26 MADAME CHAIR PITKA: Okay. So we're
27 opening the floor to tribal and native organization
28 testimony. Do we have any tribal representatives or
29 native organization representatives?

30

31 MS. LAVINE: If there are any tribal
32 organizations or ANCSA corporation representatives who
33 are interested in speaking to Wildlife Proposal 24-05
34 on the record, you can do so by raising your hand. You
35 can press star, five or you can speak up. Just unmute
36 your phone. If you're on the phone, you can press
37 star, six. Thanks.

38

39 (No comments)

40

41 MADAME CHAIR PITKA: Okay. Thank you
42 very much. So at this time I'd like to welcome
43 testimony from advisory groups -- oh, sorry.

44

45 MS. LAVINE: Patricia Phillips is on
46 the line.

47

48 MADAME CHAIR PITKA: Patricia Phillips.

49

50

0253

1 MS. PHILLIPS: I'm sorry. Is this for
2 public comment? My apologies.

3
4 MADAME CHAIR PITKA: No, I'm sorry.
5 This is tribal or ANCSA corporation comment at this
6 time.

7
8 MS. PHILLIPS: Thank you. My
9 apologies.

10
11 MADAME CHAIR PITKA: No worries. Thank
12 you very much. Now I'd like to open the floor to
13 advisory group testimony. The State ACs, the SRCs,
14 working groups on this issue.

15
16 (No comments)

17
18 MADAME CHAIR PITKA: Okay. Seeing
19 none. Was there any written comments submitted from
20 the SRCs?

21
22 MS. LAVINE: Madame Chair. The written
23 comments from the SRCs are in your supplemental
24 materials under Tab 5, I believe. Thank you.

25
26 MADAME CHAIR PITKA: Thank you very
27 much for that. Now we're going to open the floor to
28 public testimony. I believe we have a comment card
29 from Mr. Richards.

30
31 MR. RICHARDS: (Shakes head negatively)

32
33 MADAME CHAIR PITKA: No? So it said
34 05, 06. Okay, your comment stands then for all three
35 of them. Thank you very much. Thank you so much for
36 your time.

37
38 Now we have Patricia Phillips online.

39
40 MS. PHILLIPS: Thank you, Madame Chair.
41 I speak in support of WP24-06 deer in Pelican. Pelican
42 and Unit 4 communities have customary and traditional
43 use of deer in Unit 4. There is a Federal subsistence
44 priority for Pelican. There is substantial evidence by
45 Federally-qualified users testifying that their
46 subsistence needs are not being met. Federally-
47 qualified residents of Unit 4 have a long pattern of
48 harvesting deer in this area.

49
50

0254

1 The specific area of Lisianski Inlet
2 Strait, the community within this area has customary
3 and traditional use designation. This proposal does
4 not affect the entire Unit 4 area. Customary and
5 traditional determinations for deer do not limit
6 non-subsistence use. It simply allows for subsistence
7 use.

8
9 ANILCA does not prevent the Federal
10 Subsistence Board from regulating a subsistence use
11 simply because the indirect affect of the proposal may
12 cause restrictions on non-subsistence use. This
13 proposal is consistent with ANILCA 802(1), consistent
14 with sound management principles, the process of
15 Federal subsistence regulatory proposals is a part of
16 the process of sound management principles.

17
18 Under ANILCA .804 the taking on Federal
19 public lands of fish and wildlife and non-wasteful
20 subsistence uses as prioritized over the taking of
21 other purposes.

22
23 Finally, in closing, when ANILCA was
24 under consideration in Congress, the Senate Report No.
25 96-413 says non-subsistence use -- on Page 5177.
26 Non-subsistence uses may continue in accordance with
27 existing law but do not enjoy any preference on the
28 public lands and consequently may be restricted
29 pursuant to Section .804 when necessary to protect
30 subsistence resources or insure the satisfaction of the
31 subsistence needs of rural residents.

32
33 Thank you, Madame Chair.

34
35 MADAME CHAIR PITKA: Thank you very
36 much for your testimony, Ms. Phillips. I'd like to
37 clarify that this is for WP24-05 or is it for WP24-06?
38 24-06 is the one on Pelican and 24-05 is the one on
39 Hoonah.

40
41 MS. PHILLIPS: Oh.

42
43 MADAME CHAIR PITKA: If it's for 24-06
44 Pelican, then we will keep your comment on the record
45 for 24-06 Pelican. Can you please clarify that? Thank
46 you.

47
48 MS. LAVINE: Patty, if you're still on
49 the line, we just wanted to clarify that we would
50

0255

1 retain the comment you just shared in consideration of
2 Wildlife Proposal 24-06. If you want to confirm, type
3 confirm, you may do so now.

4
5 MS. PHILLIPS: I confirm that. Where
6 do I type that?

7
8 MS. LAVINE: You're on the record.
9 Thank you. We all heard you. Thank you so much for
10 your testimony.

11
12 MS. PHILLIPS: Thank you for clarifying
13 that for me.

14
15 MADAME CHAIR PITKA: Thank you for
16 allowing the clarification. Now on the phone line we
17 have phone number ending in 4932. Can you please state
18 your name for the record and spell it, please.

19
20 MR. ORR: Can you hear me first?

21
22 MADAME CHAIR PITKA: Yes, we can hear
23 you. Thank you so much.

24
25 MR. ORR: Okay. Good. Nicholas Orr,
26 N-I-C-H-O-L-A-S O-R-R.

27
28 MADAME CHAIR PITKA: Thank you. Please
29 proceed.

30
31 MR. ORR: My testimony is going to be
32 similar to what it was on WP24-04 but just a little bit
33 different. My name is Nicholas Orr and I'm a member of
34 the Juneau-Douglas Advisory Committee. We submitted a
35 letter -- written comments on all of these proposals.
36 I'm not sure if you noted that. It wasn't clear to me,
37 but anyways.

38
39 So I'm a member of the Juneau-Douglas
40 Advisory Committee as well as a board member of
41 Territorial Sportsmen here in Juneau. On this proposal
42 I will also be speaking for Ryan Beason, who is not
43 able to speak for Territorial Sportsmen. He's the
44 president. He's unable to make this one. So I'm here
45 today commenting on WP24-05.

46
47 Under ANILCA non-Federally-qualified
48 users can be restricted when there's a conservation
49 concern or as necessary for the continuation of
50

0256

1 subsistence uses. I'd like to say if there was a
2 conservation concern or if non-Federally-qualified
3 users were legitimately impacting the continuation of
4 subsistence uses, I and others in Juneau would step up
5 and say, hey, these areas need to be subsistence only.

6
7 That said, it doesn't appear
8 non-Federally-qualified users are impacting the
9 continuation of subsistence activities in this area as
10 in WP24-04. I think looking at the continuation of
11 subsistence uses is the sort of thing that requires a
12 two-part test. Does it pass the smell test or does it
13 make sense?

14
15 Does it make sense that Hoonah's
16 non-Federally-qualified users are traveling in Hoonah
17 in such numbers that they're inhibiting the
18 continuation of subsistence uses? I'd say it's a
19 popular hunting destination and I can understand the
20 irritation in seeing other hunters and I'm sure that
21 seeing non-Federally-qualified users concentrated at
22 the ferry as they're getting on and off could give the
23 impression that the Hoonah area is overrun with
24 non-Federally-qualified users.

25
26 That said, there's something like 150
27 to 200 miles of road in the Hoonah area, so it's hard
28 to imagine there's so many non-Federally-qualified
29 users. They're not able to stop along the road
30 someplace and go hunting. I would like to point out
31 that a number of those non-Federally-qualified users
32 are taking the ferry. So at any given time that whole
33 number, which I think was close to 300, is not on the
34 Hoonah road system.

35
36 Furthermore, a significant percentage
37 of the non-Federally-qualified users are either cabin
38 owners in Freshwater Bay who are by and large not
39 utilizing the road system or are hunters from Tenakee
40 utilizing the southern edge of the proposal area. I'm
41 just noting that because the 300 figure or approximate
42 300 figure that Fish and Game gave us was for the
43 original proposal which did not exclude the portion
44 that borders Tenakee Inlet.

45
46 So that moves us to the second part of
47 the test, what do the numbers say. The average number
48 of non-Federally-qualified users utilizing this area
49 over the past nine years is actually decreasing if you
50

0257

1 look at the hunter efficacy numbers. It looks like
2 Hoonah has some of the best days per deer hunted in the
3 state at 2.1. The numbers don't support the idea that
4 non-Federally-qualified users are impacting the
5 continuation of subsistence uses and neither does
6 common sense.

7

8 Finally, the OSM notes that the
9 modified proposal they're supporting have limited
10 impacts on non-Federally-qualified users. I would note
11 that simply because the original proposal will have
12 limited impact on non-Federally-qualified users does
13 not mean that it meets the standards for restricting
14 non-Federally-qualified users set under ANILCA.

15

16 I urge you not to pass the proposal and
17 thank you for your time.

18

19 MADAME CHAIR PITKA: Thank you so much,
20 Mr. Orr. I appreciate your comments. Next on the
21 phone we have Madeline Demaske.

22

23 MS. DEMASKE: Good morning. Can you
24 guys hear me today?

25

26 MADAME CHAIR PITKA: Yes. Yes, we can
27 hear you very clearly.

28

29 MS. DEMASKE: Awesome. Thank you so
30 much for your patience yesterday and my apologies on
31 that. Thank you, Madame Chair. Hello. For the record
32 my name is Madeline Demaske. I'm speaking on behalf of
33 Safari Club International. With time of the essence,
34 would you please apply these comments in opposition to
35 both Wildlife Proposal 24-05 and Wildlife Proposal
36 24-06.

37

38 In February 2023, the Federal
39 Subsistence Board rejected related proposals and
40 Wildlife Proposal 24-05 and Wildlife Proposal 24-06
41 have no more support than the earlier proposals and
42 they should be denied for the same reasons. Not only
43 do these proposals lack State and Federal support, but
44 they run counter to the directives set out in the
45 Alaska National Interest Lands Conservation Act,
46 commonly known as ANILCA, and the Federal Subsistence
47 Board's implementing regulations.

48

49 The proponents have failed to show how

50

1 the proposal is necessary to conserve the Sitka
2 black-tailed deer population or for the continuation of
3 subsistence uses. The Board should reject these
4 proposals because they request relief outside the
5 subsistence priority established in ANILCA.

6
7 ANILCA Section .815(3) allows the Board
8 to close Federal public lands to non-subsistence
9 hunting only when necessary for the conservation of
10 healthy populations of fish and wildlife or to continue
11 subsistence uses of such populations. ANILCA does not
12 authorize closure due to perceived competition. ANILCA
13 does not empower the Federal Subsistence Board to enact
14 restrictions to non-Federally-qualified users based
15 solely on their mere presence in an area.

16
17 Neither of these limited justifications
18 exist on the facts as presented. There is no
19 conservation concern for the affected areas deer
20 population and none of the harvest data suggests
21 Federally-qualified users are having an issue
22 harvesting deer. Instead, data suggests that the deer
23 population in this area is healthy.

24
25 A closure of non-subsistence hunting
26 would not be necessary to maintain a healthy deer
27 population. Significantly, the proponents do not
28 assert that the closure is necessary for conservation
29 purposes. The closure is also not necessary for the
30 continuation of subsistence uses.

31
32 Residents currently enjoy several
33 meaningful subsistence preferences, including an extra
34 month of hunting opportunity in January and a liberal
35 designated hunter program where any Federally-qualified
36 user can hunt on behalf of another Federally-qualified
37 user.

38
39 Further, according to data compiled by
40 the State, residents have historically been very
41 effective at harvesting deer. Further, according to
42 reports submitted by hunters, their efficiency has
43 improved over the last decade and residents in general
44 are experiencing extremely efficient deer hunting.

45
46 Since the proposal does not satisfy
47 ANILCA, the Federal Subsistence Board must reject it.
48 SCI fully understands and supports the fact that the
49 Federal Subsistence Board must prioritize subsistence
50

0259

1 use of natural resources if a conservation need exists.
2 However, the status of Sitka black-tailed deer in the
3 area do not require that non-subsistence hunting be
4 restricted to protect either the resource or
5 subsistence uses.

6
7 Thank you again for the opportunity to
8 comment on the important proposal and we urge you to
9 reject Wildlife Proposal 24-05 and 24-06. If these
10 comments could please apply to both, that would be
11 wonderful. Thank you.

12
13 MADAME CHAIR PITKA: Yes, thank you,
14 Ms. Demaske. We will apply the comments to both 24-05
15 and 06. I appreciate your time today.

16
17 Okay. We don't have anybody else
18 online. Is there anybody else in the room that has
19 their hand raised right now or any comment cards?
20 Okay. Somebody else has their hand up. Great.

21
22 MS. LAVINE: Madame Chair. Darrell
23 Wetherall is on the line. Darrell.

24
25 MR. WETHERALL: Yeah, hi. I live in
26 Juneau. Can you hear me?

27
28 MADAME CHAIR PITKA: Yes, we can hear
29 you. Thank you. Please proceed.

30
31 MR. WETHERALL: Okay. Thank you. I
32 live in Juneau. We moved up here when I was five years
33 old in 1976. I feel like my lifestyle is parallel to
34 the gentleman that testified yesterday in favor of 04.
35 I'm in my mid 50's. My first deer hunt was in Tenakee
36 at the age of seven. My dad was in the U.S. Forest
37 Service, so there's a lot of traveling to small
38 communities.

39
40 My next hunt was in Hoonah. I own
41 property in Hoonah, but I do live in Juneau for work.
42 So I have 40, almost 50 years of real world experience
43 hunting in Hoonah. I've never had any issues
44 harvesting deer ever. Even in some of those really
45 hard years. A lot of it is just effort. Some of the
46 things that aren't really being addressed, you know,
47 whether it's an enforcement issue or whatever, people
48 are shooting deer from the road. They're targeting
49 does. You know, that goes to the safety thing.

50

0260

1 This is not necessarily all non-Federal
2 people from Juneau. This is happening across the
3 board. You know, the fact of the matter is shooting
4 deer from the road is easy and it is efficient and it's
5 wrong. I think that really needs to be looked at first
6 before you target a specific group of people who've
7 enjoyed this lifestyle for decades.

8
9 You know, the other issue that I kind
10 of see is Hoonah is not the same as Pelican or Angoon.
11 I've hunted in those areas as well. Hoonah has an
12 extensive road system. As another person testified,
13 there's hundreds of miles of logging roads and there
14 are plenty of opportunities to get off the road. If
15 you just get off the road, you're going to get deer.

16
17 So, you know, you've got to look at
18 kind of the big picture here. There isn't an issue
19 harvesting deer for anyone out there. You know, take
20 -- sorry, a little nervous. You know, take for example
21 like even the economy in Hoonah. There's a deep-water
22 port that's bringing cruise ships in and they're
23 bringing tens of thousands of people through Hoonah.

24
25 You know, that's all right. I'm not
26 saying that they can't develop their economy, but there
27 is an impact that has nothing to do with the
28 subsistence or even in direct opposition to the
29 subsistence lifestyle. They're running ATVs all around
30 the place for tourism, they're looking at building
31 additional hydro. They just completed the gondola
32 project. There's the longest zipline in the world.
33 There's even a microbrewery in Hoonah now.

34
35 So to say that food insecurity is a
36 problem is just wrong. Sorry, that's just my opinion.
37 They get ferry service, you know, a couple times a
38 week. There's regular air service coming in and out
39 daily. Multiple flights on Alaska seaplanes.

40
41 So I just feel like when you look at
42 the big picture here there's really just not an issue
43 and there's really no need, based on any kind of, you
44 know, factual basis to support this. Any closure for
45 any reason. So that's all I wanted to say. I
46 submitted some written comments kind of addressing a
47 few other topics. I appreciate your time and allowing
48 the public to kind of provide some feedback on these
49 issues.

50

0261

1 MADAME CHAIR PITKA: Thank you so much
2 for your comment. We got your email in this morning,
3 so we appreciate it.

4
5 MR. WETHERALL: Okay. Thank you. So
6 now we are at Regional Advisory Council recommendations
7 because I see no more hands raised. Go ahead, Mr.
8 Hernandez.

9
10 MR. HERNANDEZ: Thank you, Madame
11 Chair. Don Hernandez for the Southeast RAC. Before I
12 start my comments here I do want to commend the staff
13 for their analysis of these proposals, all three of
14 them. I think they've done a really good job in this
15 effort to bring in some more local knowledge into their
16 analysis. Not something we've heard as much of in the
17 past and I think they're doing a much better job. So I
18 want to commend them for that.

19
20 So the Council voted to support
21 Wildlife Proposal 24-05 with a modification to reduce
22 the original proposed closure area and shorten the
23 harvest period from November 1st to the 15th to
24 November 1st through the 10th. As with the previous
25 proposal, the Council shortened the proposed closure
26 period as mentioned to support the continuation of
27 subsistence uses while supporting the least impact to
28 non-Federally-qualified subsistence users.

29
30 Deer have been and continue to be very
31 important to the subsistence livelihoods and lifestyle
32 for Hoonah rural residents. This proposal improves
33 Hoonah residents' ability to meet their subsistence
34 needs. The modified proposal protects continuation of
35 subsistence uses where the State population has grown
36 and competition for resources has increased as a result
37 of logging road construction and the resulting enhanced
38 accessibility.

39
40 The Council recognizes that technology
41 also provides opportunities for more efficient hunting
42 by everyone. The data presented in the analysis
43 supports testimony that there could be localized
44 depletions of the resource in this area. Similar to
45 the community of Angoon, Hoonah suffers from food
46 insecurity issues and from increased costs for hunting
47 trips.

48
49 The modification affords a priority for
50

0262

1 local Hoonah residents to meet their subsistence needs
2 and provides for the continuation of subsistence uses.

3

4 That's what I have.

5

6 Thank you.

7

8 MADAME CHAIR PITKA: Thank you very
9 much, Mr. Hernandez. Did I skip over advisory group
10 testimony?

11

12 MS. HOWARD: No.

13

14 MADAME CHAIR PITKA: No, I did not.
15 I've been very thorough. Okay, awesome.

16

17 So the Alaska Department of Fish and
18 Game comments.

19

20 MR. MULLIGAN: Thank you, Madame Chair.
21 Again, I am going to stress context in looking at the
22 figures that we provide in our comments for
23 non-Federally-qualified users. Just the numbers of
24 hunting deer. If you look at the 10-years span before
25 the heavy winter event and then the 10-year average
26 after, it's less. If you look at the numbers from that
27 event up to now, they have increased. If you look at
28 from regulatory year 2015-2016 till now, they've
29 decreased.

30

31 The same way with when you're looking
32 at non-Federally-qualified users in 100 days, the
33 10-year average between that time period of low
34 abundance because of the winter event is down. The
35 same with the numbers that you'll see for number of
36 non-Federally-qualified user 100 days from 2015 till
37 today.

38

39 So I again stress just looking at our
40 tables and our figures to look at all the different
41 ways those numbers are and what you're looking at as
42 far as the impact of non-Federally-qualified users.

43

44 I will reference my testimony from
45 WP24-04 as it applies to ANILCA and in general for the
46 Unit 4 statements. Those very much still apply to this
47 proposal as well. I will add some Hoonah specific
48 comments and we will note that Federally-qualified
49 users in Hoonah already enjoy several meaningful

50

0263

1 preferences, including an extra month of hunting
2 opportunity in January, a liberal designated hunter
3 program and living close to the resource which allows
4 FQUs to hunt whenever conditions are favorable.

5

6 We also note that they have access to
7 Hoonah Totem and Sealaska if they are a shareholder.
8 Access to those lands as non-Federally-qualified users
9 do not. Non-Federally-qualified users from Juneau are
10 limited by the marine highway schedule and vehicle
11 capacity.

12

13 If they are accessing the area by boat
14 from Juneau, they need to travel a minimum of 40 miles
15 to Whitestone Bay or 60 miles to Hoonah during a time
16 of year with short days and often unfavorable weather.

17

18 Non-Federally-qualified users have a
19 more restrictive bag limit of three deer east of Port
20 Frederick and non-resident hunter, non-Alaskan
21 residents have a more restrictive bag limit of two
22 bucks.

23

24 So we can't see under ANILCA how they
25 don't already have a meaningful preference, nor could
26 we find any justification for limiting non-Federally-
27 qualified users based on the safety concerns, economics
28 or the potential for altering deer behavior.

29

30 In conclusion again, like our comments
31 on 24-04, we find no justifications under ANILCA to
32 pass this proposal.

33

34 Thank you.

35

36 MADAME CHAIR PITKA: Thank you very
37 much. I appreciate your comments.

38

39 The InterAgency Staff Committee
40 comment, please.

41

42 MS. LAVINE: The ISC acknowledges the
43 extensive effort made by the Southeast Alaska
44 Subsistence Regional Advisory Council during both the
45 2022-2024 and the 2024-2026 Wildlife Regulatory Cycles
46 to help Federally-qualified subsistence users meet
47 their subsistence needs for deer in the Hoonah area.

48

49 Deer populations in Unit 4 are the

50

0264

1 highest in the state and closures are not needed for
2 conservation reasons. The Council's justification in
3 WP24-05 focuses on the closure being necessary to
4 continue subsistence uses due to competition and user
5 conflict in the areas closer to Hoonah and localized
6 depletions of deer not tracked at a finer scale.

7
8 While reported harvest success by
9 Federally-qualified subsistence users appears stable
10 over the last decade based on quantitative harvest
11 data, Federally-qualified subsistence users in the
12 area report this data may not be tracked at a fine
13 enough scale to capture hunter effort and competition
14 that affects their ability to harvest enough deer to
15 meet their subsistence needs.

16
17 The ISC recognizes the effort that the
18 Council has put into providing a meaningful subsistence
19 priority, while trying to reduce restrictions to
20 non-Federally-qualified users as much as possible.

21
22 Since submission of their first
23 proposal for the 2022 regulatory cycle, the Council
24 reduced the duration of their requested restrictions to
25 limit non-Federally-qualified users to two bucks for
26 the entire season, to a 15-day closure, to the current
27 Council recommendation of closing for 10 days at the
28 beginning of November and reduced the requested closure
29 area to those areas closest to home and most utilized
30 by Hoonah residents.

31
32 Thank you, Madame Chair.

33
34 MADAME CHAIR PITKA: Thank you very
35 much. Now we're at Board discussion with Council
36 Chairs and the State Liaison. Does anybody have any
37 questions for the State Liaison or the Board Chairs?

38
39 Go ahead. Thank you.

40
41 MR. VANORMER: Yeah, I have a question.
42 I don't know if it's for the State necessarily. Sorry.
43 Chad VanOrmer, Forest Service for the record. It might
44 be for Jason, OSM. I'm curious in the analysis we
45 focus a lot on the road system. Does the data tease
46 out any of the effort or concerns on like shoreline
47 boat-based hunting versus the road-based hunting and
48 the conflicts or the competition that's going on in
49 that regard?

50

0265

1 MR. ROBERTS: Through the Chair. If
2 you look at some of the recent Council transcripts, I
3 believe they do talk about some of these issues as far
4 as boat-based hunting is concerned too. However, I
5 think we have -- it's fair to say that there's more
6 concern about stuff along the road.

7

8 Thank you.

9

10 MADAME CHAIR PITKA: Thank you very
11 much. Are there any additional thoughts from the
12 Council Chair.

13

14 MR. HERNANDEZ: I might want to address
15 one thing that's been discussed here a little bit.
16 Localized depletions. It's a fairly large issue in the
17 Hoonah area. All these road networks that we're
18 talking about associated with timber harvest.

19

20 There's been extensive timber
21 harvesting in the Hoonah area both by Native
22 corporation and the Forest Service and there are
23 literally -- I don't know, somebody from the Forest
24 Service might have a better idea. I'd say tens to
25 hundreds of thousands of acres that are now in that
26 stem exclusion stage where there is virtually no deer
27 habitat available. So that factor has really condensed
28 the hunting effort by all users. So that's a big
29 factor in the Hoonah area.

30

31 MADAME CHAIR PITKA: Thank you very
32 much for that. I appreciate it. Do you have any other
33 comments, State Liaison, Mr. Mulligan.

34

35 MR. MULLIGAN: Madame Chair. I will
36 make one comment. I don't know if it's in this unit,
37 but we are in a partnership I think down in Unit 2 with
38 Mule Deer Foundation who is looking at these stem
39 exclusion units where we can create more deer habitat.
40 I know they're focusing -- I think a lot of folks
41 forget that black-tail is a mule deer species. And not
42 just Unit 2, they'll be focusing on other areas too.
43 So it could be that they will come up into Unit 4 to
44 try to address those concerns as well.

45

46 MADAME CHAIR PITKA: Thank you so much.
47 I appreciate that. What was the agency? I did not
48 catch that part.

49

50

0266

1 MR. MULLIGAN: It's a non-governmental
2 entity called the Mule Deer Foundation.

3
4 MADAME CHAIR PITKA: Thank you. Is
5 there any other discussion? Anybody else have any
6 thoughts or comments right now?

7
8 (No comments)

9
10 MADAME CHAIR PITKA: Okay. If not,
11 we'll go to the Board motion, discussion and action.

12
13 MR. VANORMER: Madame Chair.

14
15 MADAME CHAIR PITKA: Yes. Sorry.

16
17 MR. VANORMER: The Forest Service has
18 the motion and I move to adopt WP24-05 with the RAC
19 modification to close deer hunting by non-Federally-
20 qualified users from November 1st through the 10th and
21 remove Wildlife Analysis Areas 4222 and 3526 from the
22 proposed closure area in deference to the Southeast
23 Alaska Subsistence Regional Advisory Council.

24
25 Following a second, I will explain why
26 I intend to support my motion.

27
28 MR. BROWER: Second by Public Member.

29
30 MR. VANORMER: Thank you, Madame Chair.
31 Again the Forest Service acknowledges the importance of
32 subsistence way of life to rural residents living in
33 Hoonah. I believe there's sufficient evidence in the
34 record to find that sport hunting is having a negative
35 impact on subsistence uses, particularly Hoonah
36 residents' ability to continue their subsistence uses
37 of deer. This is a valid reason for a closure.

38
39 The Federal Subsistence Program has
40 always relied on Traditional Ecological Knowledge and
41 the testimony of rural subsistence users in addition to
42 biological and harvest data. Here the Board has heard
43 from local users about their difficulty harvesting deer
44 due to outside pressures and excessive competition from
45 sport hunters.

46
47 I'm heavily weighing the testimony and
48 evidence in the record from local subsistence users and
49 the Southeast RAC chairman, which I find to be credible

50

0267

1 and firmly rooted in local and traditional knowledge.

2

3

4 The record reflects local knowledge
5 about high levels of competition on the Hoonah Road
6 System around the rut having a detrimental effect on
7 local subsistence deer harvest, including by impacting
8 Federally-qualified subsistence users' ability to hunt
9 effectively and efficiently during the key period,
10 potentially causing localized depletions of deer and by
11 displacing local residents from preferred or
12 traditional hunting areas.

12

13

14 Hoonah's close proximity to Juneau,
15 approximately 40 miles by boat, also means that the
16 coastlines may be heavily pressured by non-Federally-
17 qualified users.

17

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 I also want to note that the recent
2023 survey by the Hoonah Indian Association
highlighting concerns about the negative effects of
competition on deer hunting in Hoonah as well.

 In short, traditional ecological
knowledge from the Federally-qualified subsistence
users documents that outside pressure from an
increasing human population, increasing competition for
resources, and more efficient hunting technology are
affecting rural subsistence users' ability to engage in
subsistence uses.

 Quantitative data also shows that
competition for deer in the proposal area is very high
based on non-Federally-qualified subsistence user
hunter days and that the average number of
non-Federally-qualified user hunter days in the
proposal area per year increased substantially during
the 2011-2020 period.

 For these reasons the Southeast
Regional Advisory Council proposed WP24-05 to support
the continuation of subsistence uses while minimizing
the impact to non-Federally-qualified users with a very
targeted closure. Specifically Wildlife Proposal
WP24-05 would improve access to nearby subsistence
resources by reducing competition for limited access
points, making it more efficient and economical for
Hoonah residents to meet their subsistence needs and
thus provide for the continuation of subsistence uses.

0268

1 I recognize that the Board previously
2 rejected a proposal, WP22-08 that would have reduced
3 the annual harvest limit for non-Federally-qualified
4 users in the Northeast Chichagof Controlled Use Area.
5 The current proposal is substantially different because
6 it requests a short closure to deer hunting to
7 non-Federally-qualified users, not a harvest reduction.
8 This is primarily motivated by concerns about high
9 levels of sport hunter competition threatening the
10 continuation of subsistence uses by Federally-qualified
11 users.

12
13 Further, the closure is especially
14 critical because of the importance of the proposal area
15 to local residents, many of whom may not be able to
16 travel far from home or spend long periods of time
17 unsuccessfully hunting deer. The fact that those most
18 dependent on the resource are reporting difficulty
19 harvesting deer justifies taking action.

20
21 In conclusion, the Forest Service
22 supports WP24-05 with the RAC modification to help the
23 residents of Hoonah continue their subsistence way of
24 life, meet their subsistence needs and continue their
25 subsistence uses of deer.

26
27 Thank you, Madame Chair.

28
29 MADAME CHAIR PITKA: Thank you very
30 much. I appreciate that. Are there any questions on
31 the motion?

32
33 (No comments)

34
35 MS. JOHN: Question.

36
37 MADAME CHAIR PITKA: Thank you very
38 much. I'd like a roll call vote, please.

39
40 MS. HOWARD: Thank you, Madame Chair.
41 Moving into the roll call vote for motion to adopt with
42 the Regional Advisory Council modification on Wildlife
43 Proposal 24-05. I will start with the maker of the
44 motion, U.S. Forest Service, Chad VanOrmer.

45
46 MR. VANORMER: Forest Service supports
47 the proposal.

48
49 MS. HOWARD: Thank you. Bureau of
50

0269

1 Indian Affairs, Jolene John.

2

3

4 MS. JOHN: Bureau of Indian Affairs
5 votes in support to adopt Southeast RAC recommendations
6 with the Southeast RAC modification, as with the rural
7 subsistence users on Admiralty Island, the residents of
8 the northeast Chichagof area have also been
9 experiencing difficulties with meeting their
10 subsistence deer needs in this portion of Unit 4 due
11 primarily to increased competition from non-local
12 hunters.

12

13

14 The areas recommended for closures in
15 the Southeast RAC modifications are those most used by
16 local residents. The Council's recommendation is
17 supported by substantial evidence and is important for
18 the satisfaction of subsistence needs.

18

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I would also repeat my comments about
the Board's policy that I made on the previous
proposal.

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Thank you, Madame Chair.

MADAME CHAIR PITKA: Thank you very
much, BLM.

MS. HOWARD: Fish and Wildlife Service,
Jill Klein.

0270

1 MS. KLEIN: The Service votes to adopt
2 -- or support WP24-05 as modified by the Southeast
3 Regional Advisory Council. Also noting that deer are
4 important to local subsistence users in Hoonah and we
5 have heard from Hoonah residents that they have been
6 experiencing difficulties harvesting enough deer to
7 meet their subsistence needs because of the user
8 conflicts with non-Federally-qualified users coming
9 into the Hoonah area.

10

11 The Southeast RAC has proposed fewer
12 closure areas with a shorter duration of time than was
13 previously proposed. Because of this and based on the
14 OSM analysis and justification as well as the
15 substantive comments by the Forest Service, we support
16 this action to support the continuation of subsistence
17 uses.

18

19 MADAME CHAIR PITKA: Thank you very
20 much, Fish and Wildlife Service.

21

22 MS. HOWARD: National Park Service,
23 Sarah Creachbaum.

24

25 MS. CREACHBAUM: Madame Chair. The
26 National Park Service supports WP24-05 with the
27 Southeast RAC modification for the reasons stated by
28 the Forest Service. The Council's justification for
29 submitting WP24-05 focuses on the closure being
30 necessary to continue subsistence uses due to
31 competition and user conflict in the area is closer to
32 Hoonah.

33

34 Federally-qualified subsistence users
35 in the area report that local hunter effort is
36 underestimated by the harvest data and does not capture
37 competition that affects their ability to harvest
38 enough deer to meet their subsistence needs.

39

40 The analysis indicates there is
41 qualitative and quantitative data that supports
42 residents claims that competition with non-locals has
43 been threatening the continuation of subsistence uses
44 of deer and that a limited closure to non-Federally-
45 qualified users is necessary to continue these uses per
46 Section .815(3) of ANILCA.

47

48 I would like to recognize again the
49 effort the Council has put in to providing a meaningful
50

0271

1 subsistence priority while trying to reduce
2 restrictions on non-Federally-qualified users as much
3 as possible.

4
5 Notably, since submission of their
6 first proposal for the 2022 regulatory cycle, the
7 Council greatly reduced the duration of the requested
8 closure to the current Council recommendation of 10
9 days at the beginning of November and reduced the
10 requested closure area to those areas closest to home
11 and most utilized by Hoonah residents.

12
13 This will provide for meaningful
14 subsistence priority in the time and area where
15 subsistence hunting effort is most able to be accessed
16 by local residents while minimizing impacts to
17 non-Federally-qualified subsistence users.

18
19 Thank you.

20
21 MADAME CHAIR PITKA: Thank you very
22 much. I appreciate that.

23
24 MS. HOWARD: Public Member Charlie
25 Brower.

26
27 MR. BROWER: I move to support WP24-05
28 with modification requested by Southeast Subsistence
29 Regional Advisory Council recommendation.

30
31 MS. HOWARD: Thank you. And Public
32 Member Brower you have Tony Christianson's proxy vote.

33
34 MR. BROWER: Support.

35
36 MS. HOWARD: Thank you. Chair Rhonda
37 Pitka.

38
39 MADAME CHAIR PITKA: I vote to support
40 as modified by the Southeast Regional Advisory Council.
41 Also to continue subsistence uses in the area. Thank
42 you very much.

43
44 MS. HOWARD: Thank you, Madame Chair.
45 The motion passes unanimously.

46
47 MADAME CHAIR PITKA: Thank you very
48 much. Now we are on 24-06 and we're still with Mr.
49 Roberts. Thank you very much.

50

0272

1 MR. ROBERTS: I apologize. This is the
2 last time you'll have to hear from me.

3
4 MADAME CHAIR PITKA: I'm sorry. One
5 second. Go ahead, Mr. Hernandez.

6
7 MR. HERNANDEZ: Thank you, Madame
8 Chair. Don Hernandez for the Southeast RAC. I just
9 want to comment on something that the member from the
10 Bureau of Indian Affairs mentioned, that they would
11 like to see monitoring.

12
13 We do have this effort that the
14 Southeast Council has very much supported in
15 co-management where we made an agreement with the
16 Hoonah Indian Association to do that type of monitoring
17 work that was mentioned briefly in the report. They
18 just kind of got started on an effort. The Southeast
19 RAC would strongly recommend that the Board support
20 these co-management efforts that do the monitoring of
21 what happens in these rural communities.

22
23 So just wanted to make that point.

24
25 Thank you.

26
27 MADAME CHAIR PITKA: Thank you very
28 much for the point. I appreciate it.

29
30 MR. ROBERTS: Again for the record my
31 name is Jason Roberts. Anthropologist at OSM. I'll be
32 presenting a summary of the analysis for Wildlife
33 Proposal WP24-06. The analysis for this proposal
34 begins on Page 782 of your meeting book.

35
36 Proposal WP24-06 was submitted by the
37 Southeast Council. The proponents are requesting to
38 close the Federal public lands within the drainages
39 flowing into Lisianski Inlet, Lisianski Strait, and
40 Stag Bay south of a line connecting Soapstone and
41 Column points and north of a line connecting Point
42 Theodore and Point Urey to deer hunting by
43 non-Federally-qualified users from November 1st through
44 November 15th. This proposal area is shown in Figures
45 1 and 2 on Pages 787 and 788 of your meeting book.

46
47 The proponents note that they submitted
48 WP24-06 to establish a meaningful preference for the
49 continuation of subsistence uses of deer by Federally-
50

1 qualified subsistence users in the Pelican area. They
2 note that Pelican residents depend on deer as a key
3 component of their subsistence way of life. However,
4 the proponents assert that residents in this area have
5 been experiencing difficulties harvesting enough deer
6 to meet their subsistence needs because of increasing
7 competition and user conflict with non-Federally-
8 qualified users.

9
10 The proponents explained that
11 non-Federally-qualified users anchor boats in small
12 bays, often inhibiting access to subsistence users'
13 primary hunting areas. The proponents further note
14 that high fuel costs, depressed local economies, small
15 boats, and inclement weather are all impacting the
16 ability of Pelican residents to meet their subsistence
17 needs.

18
19 They note that Pelican residents cannot
20 afford to have unsuccessful hunts or to travel far from
21 their community to hunt deer. The proponents note that
22 non-Federally-qualified users exacerbate these issues
23 by obstructing access, competing for deer, and
24 potentially altering deer behavior, all of which
25 decrease the chances of successful subsistence hunts.

26
27 Looking at the regulatory history in
28 2022, two proposals were submitted concerning Unit 4
29 deer regulations in the Pelican area. WP22-09 was
30 submitted by the Southeast Council, requesting that the
31 Federal public lands in the Pelican area be closed to
32 deer hunting by non-Federally-qualified users from
33 October 15 through December 31st. This proposal was
34 motivated by conservation concerns.

35
36 WP22-10 was submitted by Patricia
37 Phillips of Pelican requesting that the deer harvest
38 limit for non-Federally-qualified users hunting in
39 Lisianski Inlet and Lisianski Strait be reduced to four
40 deer. This proposal was submitted in an effort to help
41 local hunters better meet their deer harvest needs
42 while avoiding a full closure to non-Federally-
43 qualified users in the area.

44
45 At its April 2022 meeting, the Board
46 rejected WP22-09 as part of the consensus agenda. The
47 Board deferred WP22-10 and two other Unit 4 deer
48 proposals to its winter 2023 regulatory meeting,
49 requesting the user groups in the area work together to
50

1 come up with a better compromise to these issues. OSM
2 subsequently organized a public meeting regarding the
3 deferred deer proposals that was held in August 2022.

4
5 At its fall 2022 meeting, the Southeast
6 Council supported WP22-10 with modification to reduce
7 the harvest limit for non-Federally-qualified users
8 hunting in the Pelican area to two male deer and to
9 maintain the same proposal area as recommended in the
10 Fall 2021.

11
12 This modification was recommended
13 because it was suggested that a harvest limit of four
14 deer or three male deer would not provide a significant
15 conservation benefit or substantially enhance the
16 success rates of Federally-qualified subsistence users.
17 The Pelican Fish and Game Advisory Committee also voted
18 to support the two male deer harvest limit for
19 non-Federally-qualified users hunting in the Pelican
20 area proposed by this modified proposal at their
21 September 2021 meeting.

22
23 WP22-10 was subsequently rejected by
24 the Board at its February 2023 meeting. The stated
25 justification was that the available data on deer
26 populations in Unit 4 did not meet the criteria
27 required to close land or implement harvest
28 restrictions under Section .815(3) of ANILCA.

29
30 It was also noted that the proposed
31 harvest limit reductions for non-Federally-qualified
32 users would not be capable of providing a meaningful
33 conservation benefit or substantially improving the
34 success rates of Federally-qualified users. However
35 the Board member from the Bureau of Indian Affairs
36 dissented on the same basis as mentioned in the
37 previous two analyses.

38
39 The Board of Game considered State
40 Proposals 10 and 11 at their January 2023 Southeast
41 Region meeting. These proposals requested reducing the
42 harvest limit for residents and nonresidents to four
43 deer in Unit 4 Remainder. The proponents for both
44 proposals suggested that a harvest limit reduction
45 would protect deer populations, help reduce user
46 conflicts in Unit 4, and avoid a closure of Federal
47 public lands to non-Federally-qualified users.

48
49 The Pelican Fish and Game Advisory
50

1 Committee unanimously voted to support those proposals
2 at their December 2022 meeting. The Board of Game
3 subsequently adopted Proposal 10 with modification to
4 reduce the non-resident harvest limit throughout all of
5 Unit 4 to two male deer. The resident harvest limit
6 remains six deer in Unit 4 remainder.

7
8 The current proposal, WP24-06, is most
9 similar to WP22-09 in that it requests a closure to
10 deer hunting by non-Federally-qualified users in the
11 same general area in and around Pelican. However, the
12 length of the closure requested under WP24-06 is
13 approximately two months shorter than that previously
14 requested under WP22-09.

15
16 As stated in the discussion, WP24-06 is
17 motivated by concerns that high levels of competition
18 from non-local hunters in the proposal area are posing
19 a threat to the continuation of subsistence uses for
20 local hunters.

21
22 At their fall 2023 meeting, The
23 Southeast Council voted to support the current proposal
24 WP24-06 with modification to reduce the proposed
25 closure period from November 1 to November 15th to
26 November 1 to November 10th.

27
28 Deer have been a key subsistence
29 resource utilized by Pelican households for many years
30 and generally represent the most significant
31 terrestrial source of meat for rural residents of
32 Southeast Alaska.

33
34 Pelican residents participated in a
35 baseline subsistence study documenting their harvest
36 and use of deer and other wild resources in 1987. In
37 this study deer ranked as the second most important
38 resource in terms of bulk contribution to subsistence,
39 trailing only non-salmon fish at the time.
40 Unfortunately there have been no other published
41 subsistence studies of Pelican conducted since this
42 time, but a new study was scheduled to be carried out
43 by ADF&G during the winter of 2023.

44
45 Boats are used extensively by all user
46 types to facilitate deer hunting in the Pelican area
47 due to the generally steep and rugged landscape.
48 Overall, approximately 80 percent of all recent deer
49 harvests in Unit 4 have been made by boat-based
50

1 members from Pelican, hunting competition was one of
2 the key subsistence-related concerns in their
3 community. Similarly, according to the results of a
4 recent small sample survey, and it was small, conducted
5 on deer hunting in Pelican by the Hoonah Indian
6 Association, deer abundance was the most frequently
7 reported issue of concern for local harvesters followed
8 by the expenses associated with hunting and hunting
9 competition.

10

11 Still these concerns could be
12 interrelated as survey respondents noted that hunting
13 competition in the Pelican area impacted deer
14 abundance, access to preferred hunting areas and the
15 general difficulty of hunting and hunter safety.

16

17 The available quantitative data on
18 hunter effort and harvest in the vicinity of Pelican
19 was organized by Wildlife Analysis Area for this
20 analysis. Wildlife Analysis Areas correspond to the
21 major watersheds or other distinct geographical areas.
22 These are the smallest units of analysis available in
23 the harvest reporting framework.

24

25 However, unlike the previous two Unit 4
26 deer proposals, the proposal area for WP24-06 does not
27 directly coincide with Wildlife Analysis Area
28 boundaries. So this issue does complicate this
29 analysis. That being said, proximity to Pelican
30 appears to be a key factor for residents when selecting
31 deer hunting locations.

32

33 From 2000-2021 approximately 71 percent
34 of Pelican residents reported deer harvests and 66
35 percent of their reported hunting days took place
36 within the Wildlife Analysis Areas encompassed by the
37 proposal area.

38

39 The Yakobi Island and Upper Lisianski
40 Inlet areas accounted for roughly half of these
41 harvests and hunting days, while a smaller percentage
42 of Pelican hunting days and harvests took place within
43 the West Coast Chichagof and Port Althorp/Lower
44 Lisianski areas. Pelican residents reported relatively
45 minimal hunting occurring in Wildlife Analysis Areas
46 located beyond the proposal area.

47

48 Additionally, the location of about 25
49 percent of the total harvest and 32 percent of the

50

1 hunting days reported by Pelican residents during this
2 time could not be determined from the information
3 returned and is unknown. It is quite possible that some
4 of this unknown hunter harvest and hunter effort also
5 took place within the vicinity of the proposal area.

6
7 Based on the reported data, an average
8 of approximately 147 users hunted for 535 days,
9 harvesting a total of 248 deer within the Wildlife
10 Analysis Areas encompassed by the proposal area each
11 year from 2000 to 2021. In most years Federally-
12 qualified subsistence users harvested more deer from
13 these areas due to the larger number of hunters present
14 in this group.

15
16 On average, roughly 57 percent of all
17 hunters utilizing these areas each year were Federally-
18 qualified subsistence users. However, over half of the
19 Federally-qualified subsistence users that reported
20 hunting in these areas came from outside of Pelican.

21
22 On average, non-Federally-qualified
23 users composed about 43 percent of all hunters
24 utilizing these Wildlife Analysis Areas each year. The
25 estimated yearly data on harvests in the vicinity of
26 the proposal area shows similar trends during this
27 period.

28
29 The data on hunter days spent in the
30 vicinity of the proposal area each year during this
31 period exhibits a somewhat different trend.
32 Non-Federally-qualified users spent more days hunting
33 in these Wildlife Analysis Areas during fifteen of the
34 twenty-two years in this period. However, the overall
35 average yearly difference in hunting days between these
36 two user groups was relatively small over the entire
37 period of 2000-2021 analyzed. Reported hunting effort
38 and harvest by non-residents in these areas was quite
39 small.

40
41 In general, Pelican residents and other
42 Federally-qualified subsistence users reported
43 declines in average yearly hunters, hunter days, and
44 harvests over the period of time analyzed for the
45 proposal while non-Federally-qualified users reported
46 hunting effort and harvests remained more stable.

47
48 These declines in reported deer hunting
49 effort and harvests by Pelican residents are likely
50

1 explained by the declining human population of Pelican
2 coupled with the impacts of rising fuel prices and
3 declining local economies.

4
5 The OSM conclusion is to support
6 WP24-06 with the Council's modification to reduce the
7 proposed closure period from November 1 to November 15
8 to November 1 to November 10.

9
10 The justification is that deer are very
11 important to local subsistence ways of life for Pelican
12 residents. However, Pelican residents have reported
13 food security issues and difficulty harvesting
14 sufficient deer during recent Southeast Council
15 meetings. Qualitative data supports residents' claims
16 that competition with non-locals has been threatening
17 the continuation of subsistence uses of deer and that a
18 limited closure to non-Federally-qualified users is
19 necessary.

20
21 Pelican residents have noted that they
22 have had to change their deer hunting methods to focus
23 hunting efforts in areas closer to home and that it's
24 become too expensive and dangerous to travel further
25 without appropriate boats and fuel. Much like the
26 situation in Angoon.

27
28 Local knowledge attests to the fact
29 that only a limited number of boats and users can hunt
30 in narrow bays and other preferred locations due to
31 issues of access and resource competition. Residents
32 of Pelican have also noted localized depletions of deer
33 in key hunting areas closer to home, which exacerbate
34 issues of user competition and conflict. And that
35 deer populations in Unit 4 may not be tracked at a fine
36 enough scale to consistently capture these issues.

37
38 The residents have also explained that
39 their difficulties in harvesting deer are not well
40 represented in the quantitative data collected on deer
41 harvests and hunting effort. Noting that hunter
42 effort and harvest reporting tend to underestimate the
43 amount of hunting effort taking place and it
44 overestimates hunting success rates.

45
46 The OSM modification would increase
47 subsistence harvest opportunity for Federally-qualified
48 users in the Pelican area by allowing for a ten-day
49 period where residents could hunt in their most heavily
50

0280

1 utilized areas closest to home during a period very
2 important in time for local deer harvest with reduced
3 competition from non-local hunters.

4
5 Though Pelican residents' ability to
6 harvest deer during the month of January does provide a
7 degree of Federal subsistence priority in the area
8 currently, allowing for harvest in times of necessity
9 and during opportunistic encounters, January does not
10 appear to be a preferred time for deer harvesting due
11 to the often poor condition of deer and severity of
12 weather at this time in the season. As ADF&G notes in
13 their comments on this proposal, January was the least
14 hunted month for Pelican residents accounting for
15 approximately 1 percent of Pelican residents' reported
16 hunting days and 2 percent of the reported deer harvest
17 from 2013 to 2022.

18
19 Under the modified proposal
20 non-Federally-qualified users would maintain the
21 ability to hunt the majority of the west coast
22 Chichagof Wildlife Analysis Area, which appears to be
23 an important location for non-Federally-qualified user
24 hunting on Chichagof Island.

25
26 That concludes all of my lengthy
27 presentations.

28
29 Thank you.

30
31 MADAME CHAIR PITKA: Thank you very
32 much for your thorough analysis. I appreciate it. So
33 at this time we'd like a summary of the written
34 comments. We've received 48 comments in the Board book
35 and then numerous comments throughout this time.

36
37 Did Robbin step out for a moment?
38 Okay, Jason. Sorry. Go ahead.

39
40 MR. ROBERTS: OSM received a total of
41 48 written public comments on this proposal during the
42 initial comment period. As you said, you've received
43 more during this meeting. All these comments oppose
44 the proposal. These comments can be found starting on
45 Page 842 of your meeting book.

46
47 The commenters noted that ADF&G data
48 shows that there are no conservation concerns regarding
49 deer populations in this area as the populations are
50

0281

1 generally healthy and the level of competition for deer
2 in the area does not warrant a closure. The primary
3 issue impacting deer hunting recently has been the
4 impact of warmer winter weather that has not produced
5 as much snow, particularly early in the season.

6
7 This lack of snow means that deer are
8 not being pushed down to the beaches where they can be
9 more easily harvested via the beach hunting methods
10 favored by many locals. They also state that this
11 proposal would restrict the rights of long-term
12 seasonal residents and others with local ties to the
13 area to hunt deer and share and pass down cultural
14 traditions with family and friends.

15
16 The commenters also note that this
17 proposal does not consider the impact of other
18 Federally-qualified users.

19
20 MADAME CHAIR PITKA: Thank you very
21 much. We've all received comments that will be
22 reflected on the record from Patricia Phillips, Mark
23 Richards and Madeline Demaske. Please let me know if I
24 left anybody off that list. It's inadvertent, but it
25 will be in the administrative record.

26
27 At this time I'd like to ask Mr.
28 Orville Lind for the tribal and ANCSA corporation
29 consultation.

30
31 MR. LIND: Thank you, Madame Chair.
32 Board members. Orville Lind, Native Liaison for Office
33 of Subsistence Management. During the consultation
34 session on November 14 we did not receive any questions
35 or comments.

36
37 Thank you, Madame Chair.

38
39 MADAME CHAIR PITKA: Thank you very
40 much, Orville Lind. Okay. So right now we'll open the
41 floor for tribal and ANCSA corporation and Native
42 organization comments. Is there any online?

43
44 (No comments)

45
46 MS. GREDIAGIN: Sorry. We got a
47 question to just confirm that Alaska BHA emailed
48 comments in. Just a confirmation that you received it.

49
50

0282

1 MADAME CHAIR PITKA: From who?

2

3 MS. GREDIAGIN: Alaska BHA.

4

5 MR. MULLIGAN: Madame Chair.

6

7 MADAME CHAIR PITKA: Hold on. We can
8 have Staff check.

9

10 MR. MULLIGAN: I think that's
11 Backcountry Hunters and Anglers if you needed the whole
12 thing.

13

14 MADAME CHAIR PITKA: Oh, okay. Thank
15 you so much. We will have a Staff member check on that
16 and get confirmation to them.

17

18 Okay. Advisory group testimony. State
19 ACs, SRCs and Working Groups. I believe we have a
20 written comment from Juneau-Douglas in the written
21 public comments in the administrative record.

22

23 Okay. I'd like to open the floor to
24 public testimony. Mr. Richards, we have your card, but
25 earlier you said your other comment stands for this one
26 also?

27

28 MR. RICHARDS: Yes.

29

30 MADAME CHAIR PITKA: Thank you. So Mr.
31 Richards' public comment stands for this. Is there any
32 public testimony online?

33

34 MS. GREDIAGIN: So phone number 4932
35 you can press star, six and unmute yourself and provide
36 your comment.

37

38 MADAME CHAIR PITKA: Okay, phone number
39 4932.

40

41 MR. ORR: Yes, this is Nicholas Orr.
42 I'm a member of the Juneau-Douglas Advisory Committee
43 as well as a member of Territorial Sportsmen. I'll
44 also be speaking for Ryan Beason as he's not available
45 to make this portion of the meeting. He's the
46 president of Territorial Sportsmen.

47

48 I'll try and keep this brief just
49 because the comments are fairly similar to the other
50

0283

1 wildlife proposals in Southeast. I'll just kind of
2 highlight that I think looking at continuation of
3 subsistence uses is the sort of thing that requires
4 that two-part test that I've talked about. Does it
5 make sense and do the numbers support it.

6
7 So in this question, does it make sense
8 traveling Juneau to Pelican? Probably not. But does
9 it make sense that large numbers of non-Federally-
10 qualified users are purchasing plane tickets to
11 Pelican? Also probably not unless you own a cabin
12 there, which would explain why the numbers of
13 non-Federally-qualified users are relatively stable
14 over the last, I don't know, I think nine years, 20
15 years, however you want to look at it.

16
17 Then you look at hunter efficacy
18 numbers and the Federally-qualified users have the
19 highest hunter efficacy in the entire state. So if
20 we're going to implement a closure, and it sure looks
21 like that's what the Board is leaning towards, how do
22 we measure this going forward?

23
24 That's all I have.

25
26 Thank you.

27
28 MADAME CHAIR PITKA: Thank you very
29 much, Mr. Orr. Then we have Zach Decker online.

30
31 MR. DECKER: Madame Chair. Board
32 members. This is Zach Decker out of Juneau here.
33 Appreciate the time today to speak. Echo what Mr. Orr
34 commented. Not only this proposed area, but the other
35 Angoon and Hoonah areas that were previously discussed.
36 The question that I have and that I don't think has
37 been asked and I hear it brought up in the proponent's
38 proposal is that -- the question I have is how much is
39 plenty of deer to meet the needs of the subsistence
40 user?

41
42 That question by this Board has not
43 been asked. What's that level and is it subjective?
44 Many of these proposals that have come before you are
45 very subjective in nature. That we perceive that
46 there's this problem without really, I don't think,
47 hard numbers or data.

48
49 Our fear -- I think to voice a concern
50

0284

1 is our fear is that what is enough? Is this closure --
2 you know, you've passed these others and you're going
3 to -- it looks, you know, this one could pass as well.
4 You've got a closure date of 1 through 10. We're going
5 to be back here next year with now we need more days
6 and now we need more time and it's just going to
7 continue to grow.

8
9 I think that's the opposition that has
10 43 comments in opposition to this and those voices are
11 not being heard and those voices are not being
12 recognized. And the fact that, you know, it's just
13 this -- it's continual creep and overreach to a problem
14 that is speculative at best.

15
16 You know, I support the local need for
17 sustainable yield and sustainable uses when those
18 things make sense. So far no one has been able to
19 answer the question of how much is plenty of meat to
20 meet the needs of the subsistence user. Is that two
21 deer, is that four deer, six deer? You know, Fish and
22 Game data shares that there's -- you know, once you get
23 past four deer, five and six deer limit harvest, the
24 numbers fall way off. So that would indicate that, you
25 know, three to four deer meets the needs of most users.

26
27 I would hope that this Board can answer
28 that question and put it on record how much is plenty
29 of deer meat to meet the needs of the subsistence user?
30 What is that level?

31
32 Thank you for your time.

33
34 MADAME CHAIR PITKA: Thank you very
35 much for your comment. Is there anybody else online?

36
37 MS. GREDIAGIN: Yeah, phone number
38 ending in 1950. You can press star, six.

39
40 MADAME CHAIR PITKA: Okay, 1950. If
41 you could say and spell your name for the record.

42
43 Thank you very much.

44
45 MR. CARSON: Yes, thank you. My name
46 is Norm Carson, C-A-R-S-O-N. I'm a resident of
47 Lisianski Inlet at Pelican. I'm here to oppose 24-06.
48 A little bit of my background. I've hunted that area
49 the last 58 years. I don't think I've ever missed a
50

0285

1 hunting trip out there. My mother and father were
2 there when I first started and learned that area with
3 them. I passed that on to my son and last year
4 grandson.

5
6 Pelican is much different from Angoon
7 and Hoonah. First of all it's 90 nautical miles from
8 Juneau to Pelican. That's a long ways by boat. I
9 don't recommend you try it in November in a small boat.
10 The airplane ride out there costs you \$250 one way and
11 then there's a \$2 a pound freight charge if you were to
12 fly and say you bagged a deer and brought it back.
13 That's getting to be pretty expensive. Another \$250
14 plus your freight.

15
16 In 1964 the population of Pelican was
17 222. 2024 it's 90. How many of that 90 are really
18 hunters? I heard that there's a high level of
19 competition, but I haven't heard any data. What is a
20 high level of competition? Ten hunters? Five hunters?
21 That's undetermined.

22
23 Last year I was out there in November
24 and I observed Lisianski Inlet from about eight miles
25 from the head. I didn't see one boat from Pelican go
26 up the inlet. Not one during the first 10 days of
27 November. So I don't see the competition.

28
29 My son was out there and he hunted with
30 my grandson. Saw six deer the first day and shot two
31 deer and that was it. That's all they wanted. It was
32 nice of them to give their grandpa some deer meat.
33 It's in my freezer.

34
35 I had a guest out there from Juneau.
36 He was not planning on hunting, but the airplane got
37 weathered out so he went over behind our cabin on our
38 property and bagged two deer. Grandpa got more deer
39 meat in the freezer. So I'm not convinced that there's
40 a level of competition. That seems to be the popular
41 buzzword. We're too remote for a lot of people to come
42 out there.

43
44 I'm not overly impressed with the
45 methodology the Hoonah Indian Association used in their
46 survey last year. I received one notification and then
47 I emailed and said what was the method of questioning.
48 Were they standard questions written out and handed to
49 somebody or were they just general, how do we go. I
50

0286

1 never received an answer to that. I'd rather see a
2 different organization do any survey in our unit, in
3 our town area.

4

5 Looking through my notes here I might
6 also add that in our area there's 75 miles of
7 beachline, shoreline that you can hunt. There are 50
8 days they give you access for beaches. They give you
9 access to muskeg. I've counted them. I've probably
10 hunted most of them. So there's ample opportunity. It
11 doesn't take a big boat to go to. I've hunted that
12 entire area as a younger man out of a 14-foot long. It
13 was very economical.

14

15 So I'm debunking most of this stuff and
16 I think one of the problems is maybe we're just getting
17 older and less likely to get up into the woods.

18

19 Anyway, with that, I'll rest my
20 testimony.

21

22 Thank you.

23

24 MADAME CHAIR PITKA: Thank you very
25 much, Mr. Carson. I appreciate your comments today.
26 Do we have anybody else online?

27

28 (No comments)

29

30 MADAME CHAIR PITKA: Thank you very
31 much. Now we're at the Regional Advisory Council
32 recommendation. Mr. Hernandez.

33

34 MR. HERNANDEZ: Thank you, Madame
35 Chair. Council voted to support Wildlife Proposal
36 24-06 with modification to reduce the proposed closure
37 period from November 1st through 15th to November 1st
38 through the 10th.

39

40 Like the other deer proposals the
41 Council took action to support the continuation of
42 subsistence uses while providing for the least impact
43 to non-Federally-qualified subsistence users and the
44 closure dates were modified to maintain consistency
45 with the other deer proposal dates.

46

47 Also, as with the other two communities
48 mentioned previously, the deer resource is important to
49 the subsistence lifestyles and livelihoods for local

50

0287

1 rural residents in the Pelican area. Outside pressure
2 is affecting the Federally-qualified users ability to
3 meet their subsistence needs.

4
5 The members of this community are aging
6 and do not have the mobility to access some of the more
7 remote hunting areas. Economically, many local
8 residents are not able to afford to travel far for
9 hunting and must concentrate their efforts closer to
10 home.

11
12 Without providing for the continuation
13 of subsistence uses through this meaningful priority,
14 Pelican residents may not be able to meet their
15 subsistence needs or continue subsistence uses.

16
17 That's what we have.

18
19 Thank you.

20
21 MADAME CHAIR PITKA: Thank you very
22 much, Mr. Hernandez.

23
24 Alaska Department of Fish and Game
25 comments. State Liaison Ben Mulligan.

26
27 MR. MULLIGAN: Thank you, Madame Chair.
28 The Alaska Department of Fish and Game opposes this
29 proposal as well. Based on our analysis of the
30 information and data available, none of the reasons
31 under ANILCA apply. There is no conservation concern
32 for the area, nor does any of the data collected
33 suggest that Federally-qualified users are having
34 issues harvesting deer.

35
36 In fact, several indices indicate deer
37 remain abundant in the area affected by the proposal
38 and local hunters are highly efficient at harvesting
39 those deer. Given this evidence there's no need to
40 restrict harvest to non-Federally-qualified users.

41
42 To just make some points to Pelican
43 specific -- and some of those, you know, have been
44 made. The mention of the additional month of harvest
45 opportunity and the -- I would call it almost extreme
46 measures in which a non-Federally-qualified user coming
47 from outside the area has to undertake. One thing that
48 wasn't mentioned is just the personal boat time of
49 traveling over 100 miles in inclement weather is a
50

0288

1 condition that would limit those folks from coming
2 over.

3
4 Again, I'll reference our other
5 comments that still apply to Unit 4 and that we find no
6 evidence for this closure. Thank you.

7
8 MADAME CHAIR PITKA: Thank you very
9 much, Mr. Mulligan.

10
11 InterAgency Staff Committee comments,
12 please.

13
14 MS. LAVINE: Thank you, Madame Chair.
15 The InterAgency Staff Committee acknowledges the
16 extensive effort made by the Southeast Regional
17 Advisory Council during both the 2022-2024 and the
18 2024-2026 wildlife regulatory cycles to help Federally-
19 qualified users meet their subsistence needs for deer
20 in the Pelican area.

21
22 Deer populations in Unit 4 are the
23 highest in the state and closures are not needed for
24 conservation reasons. The Council's justification in
25 WP24-06 focuses on the closure being necessary to
26 continue subsistence uses due to competition and user
27 conflict in the areas closer to Pelican and localized
28 depletions of deer, not tracked at a finer scale.

29
30 While reported harvest success by
31 Federally-qualified subsistence users appears stable
32 over the last decade based on quantitative harvest
33 data, Federally-qualified subsistence users in the area
34 report this data may not be tracked at a fine enough
35 scale to capture hunter effort and competition that
36 affects their ability to harvest enough deer to meet
37 their subsistence needs.

38
39 The ISC recognizes the effort that the
40 Council has put into providing a meaningful subsistence
41 priority, while still trying to reduce restrictions on
42 non-Federally-qualified users as much as possible.
43 Since submission of their first proposal for the 2022
44 cycle, the Council reduced the duration of their
45 requested closure from 2.5 months to 15 days to the
46 current Council recommendation of 10 days at the
47 beginning of November and reduced the requested closure
48 area to those areas closest to home and most accessible
49 to the Pelican residents.

50

0289

1 Thank you, Madame Chair.

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Thank you, Madame Chair.

MADAME CHAIR PITKA: Thank you very much. I appreciate that comment. Now we're at Board discussion with Council Chairs and State Liaisons. I think I forgot to ask earlier if there were any questions of the analyst at the time. So any questions right now would be -- or clarifications needed.

MR. VANORMER: Madame Chair. Forest Service. A question for Mr. Roberts around some of the analysis here. I think I heard you say a very limited dataset from the Hoonah Indian Association. Can you describe that a little bit more clearer for me?

MR. ROBERTS: Hold on. Let me find it. So unfortunately those surveys were definitely not representative, but they do provide some data points. There was 14 respondents.

MR. VANORMER: Fourteen respondents from Pelican?

MR. ROBERTS: Uh-huh (affirmative).

MR. VANORMER: Okay. Thank you. And they all described the competition, the issues at hand around that?

MR. ROBERTS: So their biggest concern was deer abundance followed by the expenses of hunting, followed by hunting competition, but they were all pretty close together.

MR. VANORMER: Okay. All right. Thank you.

MADAME CHAIR PITKA: Thank you very much.

Do you have anything else, Mr. Hernandez?

MR. HERNANDEZ: Thank you, Madame Chair. Don Hernandez from Southeast RAC again. I would like to address one topic that's been brought up in relation to Pelican. Something we heard a fair amount of testimony about in our Council meetings and it's something that's happening throughout

0290

1 rural communities in Southeast Alaska.

2

3

4 Hoonah was pointed out their population
5 has declined by over half. Part of what's happening in
6 these communities -- you know, nature abhors a vacuum,
7 right, and when people move out of a rural community
8 most times the properties that they are selling are
9 going to Outside residents. A lot of people from down
10 south.

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It's really becoming quite an issue in Southeast Alaska in our rural communities. The people who are buying these properties, you know, they're there for the recreation. They're sportsmen. They do a lot of hunting and fishing. Some of them start lodges and bring in more people. Some of them just have a lot of friends visiting throughout the season who do a lot of hunting and fishing. It's starting to become an issue. Pelican identified this particularly.

You know, you talk about the costs of going to a place like Pelican. Well, when you've got a friend with a cabin out there, a couple hundred dollars, you know, for somebody from down south to be able to hunt and fish in a sportsman's paradise is nothing. So that's what we're seeing. So thank you.

MADAME CHAIR PITKA: Thank you very much for that clarification. I appreciate it. So I just wanted to note for the record that we did receive the letter from the Backcountry Hunters and Anglers Association of Alaska. That will also be added to the Administrative Record.

Thank you so much.

MR. VANORMER: Madame Chair. Chairman Hernandez. I appreciate that read on how rural communities are changing and the economics of rural communities. I guess that begs a question in my mind and we're talking about Federally-qualified users and non-Federally-qualified users.

Within the non-Federally-qualified users we have two different user types and they're residents of the state of Alaska and non-residents. Even then you could probably break it down between commercial users, those that are hosted by outfitter

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1 guides and those that are not.

2

3

4 So I guess -- and maybe it's a question
5 for the State. I didn't see, or it didn't jump out to
6 me if it's in here, any breakout of resident versus
7 non-resident permits in this particular area here and
8 whether that weighs in a factor.

8

9 MR. MULLIGAN: Through the Chair,
10 Member VanOrmer. No, what we did do is we broke it
11 down by Federally-qualified users locally and
12 non-locally and then just non-Federally-qualified users
13 in our analysis. I don't know if OSM did it.

14

15 MR. VANORMER: Thank you, Mr. Mulligan.
16 Maybe Jason, Mr. Roberts. Did you guys look at that
17 dataset?

18

19 MR. ROBERTS: I'm sorry. I'm trying to
20 locate it. I know it's in the previous analyses, but
21 let's see. Sorry. On Page 809 I have the reported
22 harvest by non-residents within these wildlife analyses
23 areas that compose the proposal area was quite small.
24 However, the location of about 24 percent of the
25 harvest by non-residents in Unit 4 could not be
26 determined from the information returned and is
27 unknown.

28

29 MADAME CHAIR PITKA: Thank you for that
30 answer.

31

32 MR. VANORMER: Madame Chair. I guess I
33 would request a recess before we move to the next.

34

35 MADAME CHAIR PITKA: Okay. So we're at
36 12:15 right now, so I think the recess should be lunch,
37 okay. So we'd like to recess for lunch and we'll
38 return at 1:30. We will take up the Board motion at
39 that time unless there's further discussion.

40

41 Thank you.

42

43 (Off record)

44

45 (On record)

46

47 MADAME CHAIR PITKA: So we were at
48 Board action, I believe. Board motion, discussion and
49 action. We can do a roll call really quick before we
50

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1 do that.

2

3 MS. HOWARD: Bureau of Indian Affairs,
4 Jolene John.

5

6 MS. JOHN: BIA present.

7

8 MS. HOWARD: Bureau of Land Management,
9 Chris McKee.

10

11 MR. MCKEE: BLM is present.

12

13 MS. HOWARD: Fish and Wildlife Service,
14 Sara Boario.

15

16 MS. BOARIO: Present.

17

18 MS. HOWARD: National Park Service,
19 Sarah Creachbaum.

20

21 MS. CREACHBAUM: Good afternoon,
22 everyone. NPS is present.

23

24 MS. HOWARD: Thank you.

25

26 Forest Service, Chad VanOrmer.

27

28 MR. VANORMER: Forest Service is here.

29

30 MS. HOWARD: Public Member Charlie
31 Brower.

32

33 (No comment)

34

35 MS. HOWARD: And Public Member and
36 Chair, Rhonda Pitka.

37

38

39 MADAME CHAIR PITKA: I'm here. Thank
40 you.

41

42 MS. HOWARD: Madame Chair, you have a
43 quorum.

44

45 MADAME CHAIR PITKA: Thank you so much.
46 Now we are back to Board motion on WP24-06.

47

48 MR. VANORMER: Madame Chair.

49

50

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1 MADAME CHAIR PITKA: Yes, thank you
2 very much.

3
4 MR. VANORMER: I'd like to make the
5 motion, please. I move to adopt WP24-06 with the RAC
6 modification to close deer hunting by non-Federally-
7 qualified users from November 1st through the 10th on
8 Federal public lands within the drainages flowing into
9 Lisianski Inlet, Lisianski Strait and Stag Bay south of
10 the line connecting Soapstone and Column Points and
11 north of the line connecting Point Theodore and Point
12 Urey in deference to the Southeast Alaska Subsistence
13 Regional Advisory Council.

14
15 Following a second I will explain why I
16 intend to support my motion.

17
18 MS. CREACHBAUM: NPS seconds.

19
20 MR. VANORMER: Thank you. Again I have
21 some prepared here. The Forest Service acknowledges
22 the importance of the subsistence way of life to rural
23 residents living in and around Pelican. I believe
24 there's sufficient evidence in the record that sport
25 hunting is having negative impact on subsistence uses,
26 particularly on Pelican residents' ability to continue
27 their subsistence uses of deer. This is a valid reason
28 for a closure.

29
30 The Federal Subsistence Program has
31 always relied on traditional ecological knowledge and
32 the testimony of rural resident users in addition to
33 biological or harvest data. Here we have heard about
34 local subsistence users' difficulty harvesting deer due
35 to outside pressures and competition. So I'm heavily
36 relying on the testimony and the evidence in the record
37 from local subsistence users and the Southeast Council
38 Chairman, which I find to be credible and firmly rooted
39 in local and traditional knowledge.

40
41 The record reflects concerns about
42 increased hunting pressure during the rut from hunters
43 outside the area making it difficult for Federally-
44 qualified subsistence users to harvest deer. Local
45 knowledge in the record also indicates that local users
46 can be crowded or displaced from popular hunting areas,
47 deterring them from hunting in traditional or preferred
48 areas.

49
50

1 I also note the recent 2023 survey in
2 Pelican by the Hoonah Indian Association. The
3 responses to the survey demonstrate local concerns
4 about competition and access to preferred hunting
5 areas. So, in short, traditional ecological knowledge
6 that Federally-qualified subsistence users provided
7 documents that outside pressures from a growing human
8 population increased competition for resources and more
9 efficient hunting technology are affecting rural
10 subsistence users' ability to engage in their
11 subsistence uses.

12
13 Data also shows that non-Federally-
14 qualified users have accounted for a majority of the
15 hunter days and a substantial percentage of the deer
16 harvested in the proposal area. This demonstrates the
17 relatively high level of sport hunting competition that
18 Pelican residents face when hunting their home.

19
20 So for these reasons the Southeast
21 Regional Advisory Council proposed WP24-06 to support
22 the continuation of subsistence uses while minimizing
23 the impact to non-Federally-qualified users with a very
24 targeted closure with 10 days there during the rut in
25 November.

26
27 Specifically Wildlife Proposal WP24-06
28 would improve access to nearby subsistence resources by
29 reducing competition for limited access points, making
30 it more efficient and economical for people living in
31 Pelican to meet their subsistence needs and thus
32 provide for a subsistence priority necessary for the
33 continuation of subsistence uses.

34
35 Nevertheless, I recognize that the
36 Board has previously rejected two deer proposals in the
37 Pelican area. However, the current proposal is really
38 narrow and targeted and will increase the harvest
39 opportunities for Federally-qualified users by
40 providing them with a short period without competition
41 from non-Federally-qualified users when they can hunt
42 in the heavily used areas closer to home during an
43 important time in the deer harvest season.

44
45 Further, the closure is critical
46 because of the proposal area is important to locals who
47 may not be able to afford to travel far from home or
48 spend long periods unsuccessfully hunting. The fact
49 that those most dependent on the resource are reporting
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1 difficulty harvesting deer justifies the action.

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3

4 The Forest Service supports WP24-06
5 with the RAC modification to help residents near
6 Pelican continue their subsistence way of life, meet
7 their subsistence needs and continue their subsistence
8 uses of deer.

8

9 So with that justification I'd also
10 like to add -- you know, I think we heard from the
11 previous two proposals a desire, once these are put
12 into place, to monitor metrics and understanding how we
13 can work and understand these conditions as we move
14 forward. So I highly encourage our work in that regard
15 as a Board and OSM and working through the Forest
16 Service as well.

17

18 So thank you, Madame Chair, for the
19 opportunity to share my justification.

20

21 MADAME CHAIR PITKA: Thank you very
22 much for that justification. So we're going to do
23 Board discussion right now unless somebody calls the
24 question.

25

26 MS. CREACHBAUM: Question.

27

28 MADAME CHAIR PITKA: Thank you very
29 much. I'd like a roll call vote.

30

31 MS. HOWARD: Thank you, Madame Chair.
32 Starting with the maker of the motion. The motion is
33 to adopt with Regional Advisory Council modification
34 Wildlife Proposal 24-06. U.S. Forest Service, Chad
35 VanOrmer.

36

37 MR. VANORMER: Support. Forest Service
38 supports.

39

40 MS. HOWARD: Thank you.

41

42 Bureau of Indian Affairs, Jolene John.

43

44 MS. JOHN: Bureau of Indian Affairs
45 votes to adopt. Similar to the rural subsistence users
46 on Admiralty Island and in the Northeast Chichagof
47 area, residents of the Pelican area in Unit 4 have also
48 been experiencing difficulties with meeting their
49 subsistence deer needs. We concur with the Southeast
50

50

0296

1 Regional Advisory Councils and OSM's conclusions that
2 increased competition from non-local hunters are
3 contributing to these challenges.

4
5 The Council's recommendation is
6 supported by substantial evidence is important for the
7 satisfaction of subsistence needs and addresses the
8 need for increased hunting efficiency and effectiveness
9 in light of the economic difficulties faced by these
10 Federally-qualified users.

11
12 MS. HOWARD: Thank you, BIA.

13
14 Bureau of Land Management, Chris McKee.

15
16 MR. MCKEE: BLM votes in support of
17 WP24-06 as modified by the Southeast Alaska Subsistence
18 Regional Advisory Council. This closure will allow for
19 continuation of subsistence uses in this area and
20 provide for a meaningful subsistence preference and
21 increased harvest opportunities for Federally-qualified
22 subsistence users.

23
24 We should also minimize impacts to
25 non-Federally-qualified users through reduction of the
26 closure period and by reducing competition during a
27 critical time for deer hunting by Pelican residents.

28
29 I hate to sound like a broken record
30 here, but I'll repeat my comments about the Board's
31 closure policy. I think the closure review process
32 will serve as a means to evaluate the effectiveness of
33 this closure and whether or not those closures continue
34 to be needed.

35
36 Thank you, Madame Chair.

37
38 MADAME CHAIR PITKA: Thank you very
39 much, BLM.

40
41 MS. HOWARD: Fish and Wildlife Service,
42 Sara Boario.

43
44 MS. BOARIO: Fish and Wildlife Service
45 votes to support based on the OSM analysis and
46 justification in the substantial comments and remarks
47 from our colleagues at the Forest Service and around
48 this table and the Southeast Alaska RAC comments.

49
50

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1 MADAME CHAIR PITKA: Thank you very
2 much, Fish and Wildlife Service.

3
4 MS. HOWARD: National Park Service,
5 Sarah Creachbaum.

6
7 MS. CREACHBAUM: Madame Chair. The
8 National Park Service supports WP24-06 in deference to
9 the Southeast Regional Advisory Council and with their
10 modification for the reasons eloquently stated by the
11 National Forest Service.

12
13 The Council's justification for
14 submitting WP24-06 states that the closure is necessary
15 to continue subsistence uses due to competition and
16 user conflict in the areas closer to the community of
17 Pelican. Deer have been and continue to be very
18 important to local subsistence livelihoods and ways of
19 life for people living in the Pelican area.

20
21 Data in the analysis supports residents
22 claims that competition with non-locals has been
23 threatening the continuation of subsistence uses of
24 deer and that closure to non-Federally-qualified users
25 is necessary to continue these uses per Section .815(3)
26 of ANILCA.

27
28 Residents of Pelican have noted that
29 they have had to change their deer hunting methods to
30 focus their hunting areas in areas closer to home as it
31 has become too expensive and dangerous to travel
32 further without appropriate boats and fuel.

33
34 Local knowledge attests to the fact
35 that only a limited number of boats and users can hunt
36 in narrow bays and other preferred locations due to
37 issues of access and resource competition in these
38 areas.

39
40 Local knowledge indicated depletion of
41 deer in areas they hunt while non-Federally-qualified
42 users have accounted for the majority of hunter days
43 and a substantial percentage of the deer harvested from
44 the Wildlife Analysis Areas encompassed by the proposal
45 area which may be impacting the success and efficiency
46 of Pelican residents who have had to focus their deer
47 hunting efforts closer to home.

48
49 Again, thanks to the efforts of the
50

0298

1 Council that they've put in to providing a meaningful
2 subsistence priority, the Council greatly reduced the
3 duration of their 2022 requested closure to the current
4 Council recommendation of 10 days at the beginning of
5 November and reduce the requested closure area to those
6 areas closest to home and most utilized by residents.

7
8 This will provide for meaningful
9 subsistence priority in the time and area where
10 subsistence hunting effort is most able to be accessed
11 by local residents while minimizing impacts to
12 non-Federally-qualified subsistence users.

13
14 MADAME CHAIR PITKA: Thank you very
15 much for that, National Park Service. So Member Brower
16 just informed me that he had a massive family emergency
17 and he had to be excused for a few hours. So hopefully
18 he can return this afternoon. During that time he
19 asked me to take his proxy, so I've agreed to do so.

20
21 Thank you.

22
23 MS. HOWARD: Thank you, Madame Chair.
24 So for WP24-06 your vote Public Member and Chair Pitka.

25
26 MADAME CHAIR PITKA: I support as
27 stated by the Southeast Regional Advisory Council and
28 the justification on Page 816 of the book.

29
30 Thank you very much.

31
32 MS. HOWARD: Thank you, Madame Chair.
33 And then as proxy for Public Member Brower.

34
35 MADAME CHAIR PITKA: Public Member
36 Brower also supports as stated by the Regional Advisory
37 Council and the justification on Page 816.

38
39 Thank you.

40
41 MS. HOWARD: Thank you, Madame Chair.
42 The motion passes unanimously.

43
44 MADAME CHAIR PITKA: Thank you all for
45 that. At this time we have a time certain
46 correspondence update. Time certain after lunch.

47
48 MS. LAVINE: Hello, Madame Chair.
49 Members of the Board. For the record my name is Robbin
50

0299

1 Lavine, Subsistence Policy Coordinator, and my
2 colleague Katya Wessels, Council Coordination Division
3 Lead.

4
5 This is primarily an update. We're
6 continuing a bit of a discussion around this program's
7 correspondence that began with the Council
8 correspondence policy update that's been ongoing for
9 the last year or so. Now we are focusing on Council
10 correspondence to the Board. Council is requesting the
11 Board elevate issues beyond the Board and to other
12 entities and agencies. Then also just as an FYI,
13 here's some of the Council correspondence to other
14 entities outside of the program.

15
16 We don't have a lot of time to go into
17 in-depth. We're not here to discuss issues that are
18 represented in these letters. You can see, as you
19 receive a number of these packages, how very busy the
20 Councils are in representing interests beyond what we
21 can really address by the Board and in regulation.

22
23 I would note that most of the
24 correspondence that you see right now is just within
25 the scope of the last 12 months or so. You've seen most
26 of it. It's come to you at different times. Some of
27 this correspondence in the tables are going to be
28 coming to you as a result of the All-Council meetings,
29 so please keep an eye out. They'll be coming to you
30 very soon.

31
32 I would note that a lot of the issues
33 reflected in these correspondences you've heard
34 discussed at All-Council meetings, you've heard them
35 discussed here at the Board meeting, in tribal
36 consultations and during comments on non-agenda items.
37 You also here a lot of these issues discussed in the
38 Annual Reports to you, the Board.

39
40 And I would note that that will be the
41 time during your summer work session where we can
42 engage with these particular issues. I would note that
43 last summer at your work session I think you were so
44 impressed by the number of issues and correspondences
45 that the Councils asked you to elevate beyond, to the
46 Secretaries and others.

47
48 You were impressed by those letters and
49 correspondences, also noting lack of response
50

0300

1 frequently. Often the amount of time it takes for
2 these letters to make themselves progress through the
3 review and response process. At that time last summer
4 you were so impressed by these issues that you actually
5 scheduled a meeting with the Secretary of Interior
6 while she was here for AFN and you met with her in
7 person.

8
9 So once again the packets that you've
10 received are representative of how very busy your
11 Councils have been. We will be able to discuss those
12 issues in detail during the summer work session where
13 perhaps a similar response and action by the Board may
14 be taken.

15
16 I'm going to pause now and see if my
17 colleague has anything more to say in regards to the
18 packages themselves.

19
20 Thanks.

21
22 MS. WESSELS: Thank you. Madame Chair,
23 Members of the Council. For the record, Katya Wessels,
24 Council Coordination Division Supervisor. I would like
25 to ask the staff to advance the slide, please.

26
27 So you have three tables there in front
28 of you and this is the first time we're doing an
29 exercise like that, an update like that, where we're
30 updating you on the correspondence that were sent to
31 the Board and to the Board agencies as well. So we
32 divided the correspondence in three different groups.

33
34 The first one, and by far the largest
35 group, is the letters that were sent to these Boards
36 with a request to elevate it above to the Secretaries
37 of the Interior and Agriculture. All of these letters
38 are bringing up the issues that are very critical
39 either for a specific region of the Council or for a
40 number of the regions that sign on onto these letters.

41
42 Some of the letters they went out over
43 the year, but during the All-Council meeting a lot of
44 the similar issues and new issues were brought up and
45 Councils had an opportunity to discuss it together and
46 generate more letters to send to the Board.

47
48 As you see under number 8, the seven
49 Councils signed up on the letter regarding the bycatch
50

0301

1 and interception. Three letters just got signed
2 yesterday, which is number 9, 10 and 11, with the same
3 issues that were brought to your attention during the
4 Council Chairs and representatives reports to this
5 Council the day before yesterday.

6
7 These new letters are in these packets.
8 We decided to print it out for you guys because I know
9 that all of you are very busy and sometimes maybe --
10 you know, a lot of emails you don't have a chance to
11 look through it. As Robbin said, we can have a more
12 in-depth discussion during the summer session. So this
13 is not really -- you know, like we're not discussing
14 the topics or replies.

15
16 One thing that I want to kind of point
17 out in the letter from Kodiak/Aleutian regarding
18 subsistence fisheries, there are a lot of new and
19 interesting ideas of what the Board can possibly be
20 doing. One of them is the Board maybe wants to
21 consider having an annual meeting set up with the
22 Secretaries of the Interior and Agriculture to discuss
23 these issues, but this is up for your consideration.

24
25 So the second group of letters, which
26 is in a different packet, it's just the letters that
27 were sent directly to this Board with various requests.
28 Also copies of these letters are in your packet. Not
29 all of them have been finished. Some are still being
30 drafted. Some of them came from the All-Council
31 meeting. There's also a chance for you to look at
32 these letters. There's less of them than the ones with
33 a request to elevate.

34
35 The third group of letters is also
36 mostly for your information that are the letters that
37 were sent by various councils to various Board agencies
38 talking about specific issues of concern to the
39 Councils and that the Councils want some sort of action
40 or a reply.

41
42 So that overall concludes my
43 presentation here. I think Robbin and I would be happy
44 to answer any questions if you have any.

45
46 Thank you.

47
48 MADAME CHAIR PITKA: Any Board
49 questions.
50

0302

1 (No comments)

2

3

MADAME CHAIR PITKA: Thank you very
4 much for the presentation. We look forward to a fuller
5 discussion in our summer work session.

6

7

8 Right now I'd like to make an
9 announcement that we have a couple of time certain
10 items that we would like to move up a little bit on the
11 agenda. So that would be WP24-25, 24-26, and WCR24-20.
12 We would like to move it up after WCR24-04/06. Unless
13 there's any objection -- oh, sorry. Let me go a little
14 bit slower. Okay. My mind is working about ten
15 million miles a minute and I'm sorry if you can't keep
16 up with my rapid speech.

16

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(Laughter)

MADAME CHAIR PITKA: Okay. WP24-25,
WP24-26, WCR24-20. I would like to move those up after
WCR24-04/06. Thank you all for not objecting to that.

So WP24-09, Units 13A/13B caribou.
Please lead us with the analysis.

Thank you so much.

MR. UBELAKER: This proposal requests
delegating authority to the BLM Glennallen Field Office
manager to close, reopen and adjust season dates, set
harvest limits including any needed sex restrictions,
and set any needed permit conditions for hunting of
caribou in Units 13A and 13B.

They also ask that the Ahtna
Intertribal Resource Commission be listed on the
delegation of authority letter under the consultation
section to be consulted with prior to any management
actions occurring. They're also requesting a harvest
limit of caribou in Units 13A and 13B be changed from 2
caribou to up to 2 caribou.

The expansion of this delegated
authority will allow for better management of the
Nelchina Caribou Herd and timely responses to changing
hunt conditions.

Most recently in regulatory history in
2022 the State closed all hunts, all State hunts, by

0303

1 emergency order when reduced quotas were met in rapid
2 order. After they closed them they did not offer any
3 of the winter hunts. Then in 2023 all Federal and
4 State hunts were closed prior to the season opener due
5 to the population decline.

6
7 The State closed their hunts in June by
8 emergency order, then the Federal fall hunt was closed
9 in July via WSA23-01, which affected Unit 13. The
10 Federal winter hunt was then closed in October via
11 WSA23-04, which affected Units 11, 12 and 13.

12
13 I won't bore you with the details of
14 the population of the Nelchina Caribou Herd, as I'm
15 sure you're all quite aware. Broadly, over the last 20
16 years, the herd has averaged about 37,000 caribou
17 annually. In this time there's been many ups and downs
18 in population, but they've always been within or around
19 the management objective, which is 35-40,000 caribou.

20
21 The last population peak was recognized
22 in 2019, which was above the upper end of that
23 management objective, then dramatically declined to the
24 last survey which occurred in July of 2023 to a
25 population of 8,823 caribou.

26
27 This decline was believed to be due to
28 hard winter conditions and late onset of spring, which
29 led to low calf recruitment. This low population is
30 also recognized as the lowest bull:cow and calf:cow
31 ratios that have been seen to date, which will lead to
32 another poor recruitment year.

33
34 Harvest of the Nelchina Caribou Herd
35 occurs under both Federal and State regulations. State
36 harvest accounts for about 86 percent of all caribou
37 harvested out of the Nelchina Caribou Herd. They
38 average about 2,300 per year. Federal harvest averages
39 less than 400 caribou taken per year.

40
41 An alternative considered for this
42 proposal was to delegate authority for all of Unit 13
43 rather than just Unit 13A and 13B as there is a single
44 Federal caribou permit but applies to all subunits.
45 This was not further followed because the proponent did
46 not specifically request this delegation and harvest
47 records did not indicate any need for delegating all of
48 Unit 13 as roughly 72 percent of caribou harvest comes
49 from Unit 13A and 13B on the Federal side.

50

0304

1 If this proposal is adopted, the BLM
2 will have delegated authority to close and reopen
3 seasons, adjust season dates and set harvest limits and
4 sex restrictions. AITRC would also be consulted before
5 management actions occur. These changes would provide
6 a management flexibility to respond to changing herd
7 population metrics and hunt conditions in a timely
8 manner.

9
10 Therefore, it is OSM's conclusion to
11 support WP24-09 as delegating authority and modifying
12 the harvest limit will allow for quick decisions to be
13 made for protection of the Nelchina Caribou Herd when
14 conservation concerns arise in Units 13A and 13B.

15
16 Incorporation of AITRC into the
17 consultation process with the BLM will allow an
18 important group of Federally-qualified subsistence
19 users who rely upon the Nelchina Caribou Herd to be
20 incorporated into management decisions regarding the
21 herd.

22
23 With that I would be happy to take any
24 questions anybody may have.

25
26 MADAME CHAIR PITKA: Thank you very
27 much for that. Board questions now.

28
29 (No questions)

30
31 MADAME CHAIR PITKA: It looks like you
32 did an excellent job of analysis. Thank you, sir. At
33 this time the summary of written public comments.

34
35 MR. UBELAKER: Yes. OSM received one
36 written public comment from Ahtna Intertribal Resource
37 Commission who stated that they supported the proposal
38 of moving delegated authority out of unit-specific
39 regulation to a letter, which would give greater
40 management flexibility to responding to Nelchina
41 Caribou Herd population.

42
43 They also support specifically listing
44 AITRC in the consultation list, which they state would
45 further cooperation between the Department of Interior
46 and AITRC. They reluctantly support changing the
47 harvest limits, but they realize that restrictions do
48 need to be implemented during low population periods.

49
50

0305

1 Thank you.

2

3 MADAME CHAIR PITKA: Thank you very
4 much for that.

5

6 Summary of tribal and ANCSA corporation
7 comments and consultations.

8

9 MR. LIND: Thank you, Madame Chair.
10 Good afternoon. We did have some response or feedback
11 at the consultation held on November 14th. The Ahtna
12 Intertribal Commission president is sharing that she's
13 speaking for eight villages and that they are in
14 support of Proposal WP24-09.

15

16 In regards to the Nelchina Caribou
17 Herd, very concerned about the herd being in a crisis
18 situation with management, weather as climate change is
19 affecting that, and also concerned about the
20 recruitment of calves. High concerns also for the
21 recovery rate that it may take for the herd. It may be
22 20 to 30 years. There's also a high concern of State
23 land sales and there's hopes that the State does a
24 moratorium as requested.

25

26 The other statement was that OSM Staff
27 replied that a proposal was submitted by BLM and are
28 requesting delegated authority given to the BLM field
29 office manager to close, reopen and adjust season
30 dates. Also to set harvest limits, including sex
31 restrictions and any other permit conditions for Units
32 13A and 13B. The Ahtna Intertribal Commission will and
33 should be consulted whenever any season management
34 actions occur.

35

36 That's all I have.

37

38 Thank you.

39

40 MADAME CHAIR PITKA: Thank you very
41 much for that. I appreciate it. So right now we're at
42 tribal, Native organization and ANCSA testimony. I
43 don't have any cards. Wait, do I have cards for this
44 one?

45

46 MS. LINNELL: Good afternoon. Sorry, I
47 didn't submit a blue card. For the record my name is
48 Karen Linnell. I'm the Executive Director of Ahtna
49 Intertribal Resource Commission.

50

0306

1 We are in support of WP24-09. We also
2 think it should be for the entire GMU 13, not just 13A,
3 because there are other Federal lands that may become
4 unencumbered and eligible for hunting. There's some on
5 Denali Highway that gets into 13B as well. So those
6 are things that we'd like to expand it to be all of
7 Unit 13.

8
9 As part of our MOA for cooperative
10 management appreciate the consultation that happens or
11 will happen throughout this process. The 20 to 30
12 years that I had quoted earlier was heard from a former
13 area biologist who had talked about what it might take
14 to recover this herd. When you have intensive
15 management in one part of the herd's migration pattern
16 and none at all on the other, it doesn't lend for a
17 true recovery plan, but that's outside of this
18 jurisdiction. It's not so much intensive management
19 that we're worried about, but we're looking at the
20 population and how we can help it to survive.

21
22 Three years in a row now, because this
23 winter as well, we had deep snow, we had rain events on
24 top of that deep snow and it's been another hard
25 winter. So we expect that the population number will
26 drop again because of that. They didn't range as far
27 this year.

28
29 There's been a lot of sightings on the
30 Nabesna Road. I just was there last weekend to go ice
31 fishing and saw 10 caribou out on Tanada Lake, but
32 there was less snow there. I think that's why they
33 stayed in the area. The folks that came out to meet us
34 to go ice fishing saw probably 30 caribou and four
35 wolves with them. There is action happening out there.

36
37 So Ahtna Intertribal Resource
38 Commission working with the Native Village of Tazlina
39 and Cheesh'na Tribe had recently -- they both recently
40 received a TWIG grant and that AITRC is contracting to
41 work with them on. That will be to look at range
42 distribution and diet of the wolves within Wrangell-
43 St. Elias National Park and to collar additional
44 caribou for the Mentasta Herd so that we can see what's
45 happening with that.

46
47 As you recall, we recently got approved
48 a may-be-opened bull only hunt for Nelchina in Unit 11
49 or within Wrangell- St. Elias National Park depending
50

0307

1 on numbers and depending on location and that was just
2 a few years ago and then we had this crash. So knowing
3 and understanding what's happening on the land is an
4 important part to helping recovery. We're doing all
5 that we can to help with filling those information gaps
6 so we can work on a recovery plan.

7

8 We recently participated in a Chisana
9 Caribou Management Plan revision and we're looking to
10 work with the Wrangell- St. Elias on a Mentasta Caribou
11 Herd Management Plan as well. So we're not sitting
12 idle. We're looking to see what we could do to help
13 the population and to better understand what's
14 happening on the ground.

15

16 So we ask that you support this
17 proposal, but amend it to include all of Unit 13.

18

19 Thank you, Madame Chair.

20

21 MADAME CHAIR PITKA: Thank you very
22 much. I appreciate it. Is there anybody online for
23 the Tribal and Native organization and ANCSA testimony.

24

25 (No comments)

26

27 MADAME CHAIR PITKA: Okay. So at this
28 time we'd like the advisory group testimony. Are you
29 under public testimony or ANCSA corporation?

30

31 MR. MIKE: Thank you, Madame Chair. I
32 provided a testimony card earlier.

33

34 MADAME CHAIR PITKA: Oh, okay. That's
35 under public testimony. It will be like three minutes,
36 okay. Just stay right there. Hang with me, man.
37 Okay. So thank you very much for that testimony. At
38 this time advisory group testimony, State ACs, SRCs,
39 working groups, et cetera.

40

41 MS. PATTON: Thank you, Madame Chair.
42 Members of the Board. If there's no other ACs to speak
43 to this proposal. The Wrangell-St. Elias SRC, the
44 Subsistence Resource Commission, unanimously supported
45 WP24-09 expanding the Bureau of Land Management
46 Delegation of Authority for caribou in Units 13A and B,
47 provides additional flexibility for managing the
48 Nelchina Caribou Herd.

49

50

0308

1 Specific support was also noted for
2 inclusion of the Ahtna Intertribal Resource Commission
3 among the parties to be consulted in exercising this
4 delegated authority.

5

6 Thank you, Madame Chair.

7

8 Members of the Board.

9

10 MADAME CHAIR PITKA: Thank you very
11 much. I appreciate that. Okay.

12

13 Now I'd like to open the floor to
14 public testimony and we will start with Donald Mike.

15

16 MR. MIKE: Thank you, Madame Chair. My
17 name is Donald Mike. I'm a subsistence user and urban
18 refugee. Anyway, I want to acknowledge the Federal
19 Subsistence Board for allowing public testimony. I
20 also want to acknowledge the Regional Advisory Councils
21 that help with regulations and make sure the
22 subsistence users meet their subsistence needs.

23

24 The Council members do a lot of work.
25 I know the ACs analyze the issues and they provide, I
26 think, very good and clear recommendations to the
27 Federal Subsistence Board to consider.

28

29 Anyway, on the matter of WP24-09 I
30 support the Regional Advisory Council's recommendations
31 to sunset the delegated authority after four years and
32 I also acknowledge and support Karen Linnell of Ahtna
33 Intertribal Resource Commission to include all of Unit
34 13.

35

36 Thank you, Madame Chair.

37

38 MADAME CHAIR PITKA: Thank you so much
39 for that. I appreciate it. Do we have any public
40 testimony on the phone lines?

41

42 (No comments)

43

44 MADAME CHAIR PITKA: Okay. Thank you
45 very much for that. Oh, we have one hand. Okay.

46

47 MS. LAVINE: Just as a reminder for
48 people online if you would like to directly address the
49 Board telephonically, you can raise your hand by
50

0309

1 pressing star, five. You can unmute yourself by
2 pressing star, six or mute yourself by pressing star,
3 six. If you would like to address the Board, please do
4 so now.

5

6 (No comments)

7

8 MADAME CHAIR PITKA: Okay. Thank you
9 very much. Regional Advisory Council recommendations.

10

11 MR. ENCELEWSKI: This is Greg
12 Encelewski, Southcentral Regional Advisory Council.
13 Thank you. Our Council supported with modifications.
14 The Council voted to modify the proposal by specifying
15 that the delegated authority will sunset after four
16 years.

17

18 The Council supported this proposal
19 with modifications as it allows for more timely
20 decisions to be made, including AITRC in the delegated
21 list and the entities that would be consulted. The
22 Council's modification allows four seasons to review
23 whether the Delegation of Authority is warranted.

24

25 I would like to just speak a little bit
26 to the Delegation of Authority. I know Judy covered it
27 yesterday in her Chair's report here and stuff, but we
28 felt that the delegation should remain in regulation
29 and not just in letter. But I want to give you just a
30 brief history of some of the Southcentral RAC's
31 problems with Delegation of Authority.

32

33 Back in the early days on the Kenai we
34 had a Delegation of Authority that closed Federal
35 subsistence fishing prior to even State fisheries. So
36 we got a little heartburn over it, but we've grown over
37 all that. I'll tell you a little bit about that.

38

39 Anyway, we would like to see the sunset
40 clause and one of our Council members is pretty adamant
41 about that. At the very minimum, if there's not a
42 sunset clause, we think that there should be a review
43 like a closure review every four years. Maybe have a
44 review of the Delegation of Authority letters.

45

46 I do want to state that the Delegation
47 of Authority on the Kenai lately we work very well with
48 the U.S. Fish and Wildlife, with Andy Loranger. We do
49 biannual meetings. They come to the community. They

50

0310

1 meet with us. So we have absolutely no problem there
2 with Delegation of Authority, but overall we would like
3 to see that there's a sunset or some method of review.

4

5 Thank you.

6

7 MADAME CHAIR PITKA: Thank you very
8 much for that suggestion. I know in the past we had
9 discussed different types of sunset clauses for
10 Delegation of Authority letters or like a review
11 process, but we don't currently have a Board policy. So
12 maybe that's something that we could work on in the
13 future is a Board policy around Delegation of Authority
14 letters.

15

16 MR. ENCELEWSKI: I'd love to see that.

17

18 MADAME CHAIR PITKA: Thank you. Alaska
19 Department of Fish and Game comments, State Liaison Ben
20 Mulligan.

21

22 MR. MULLIGAN: Thank you, Madame Chair.
23 The Alaska Department of Fish and Game supports the
24 proposal. Caribou populations are dynamic and adaptive
25 management strategies are necessary for effective and
26 responsible management. This includes the ability to
27 make in-season management decisions and pre-season
28 changes to season dates and bag limits on short notice
29 when updated population information becomes available
30 in the spring and summer.

31

32 The Nelchina Caribou Herd has embodied
33 a wildlife management experiment since the early 1990s
34 with the goals of minimizing the boom and bust cycles
35 by maintaining the herd well below carrying capacity to
36 provide more consistent harvest opportunity over time.

37

38 This strategy was successful throughout
39 the greater history of the Federal subsistence hunt
40 opportunity that has been available within Unit 13
41 administered by the BLM. As such, the BLM has not had
42 a significant need to limit hunt opportunities or make
43 hunt management decisions such as changing season
44 dates, bag limits or establishing quotas.

45

46 The BLM traditionally issues as many
47 permits for two caribou as there are qualified
48 applicants and in times of reduced harvest surplus
49 ADF&G has accounted for this by removing the long-term

50

0311

1 average of Federal harvest from the available surplus
2 for the upcoming season and dividing the remaining
3 surplus into quotas for the already permitted State
4 hunts existing for that regulatory year.

5

6 Now that the Nelchina Caribou Herd has
7 experienced a precipitous decline there will be a
8 significantly reduced harvestable surplus during the
9 upcoming period of herd recovery.

10

11 In some years there may not be
12 sufficient harvestable surplus to allow for any harvest
13 by Federally-qualified users at all, whether two
14 caribou or even two bulls. Responsible management
15 necessitates the ability for hunt managers to reduce
16 bag limits and season dates in situations such as
17 these.

18

19 In conclusion, we do support the
20 proposal and thank you for allowing us to comment.

21

22 Thank you, Madame Chair.

23

24 MADAME CHAIR PITKA: Thank you very
25 much. We appreciate that.

26

27 ISC comment, please.

28

29 MS. LAVINE: Thank you, Madame Chair.
30 The expanded delegated authority being requested by the
31 Bureau of Land Management in Units 13A and 13B would
32 allow for a quicker and more responsive management of
33 the Nelchina Caribou Herd.

34

35 Recent conservation concerns have
36 highlighted the need to respond quickly to rapidly
37 changing biological metrics of the Nelchina Caribou
38 Herd. Including the Ahtna Intertribal Resource
39 Commission in the management process will ensure that
40 perspectives and concerns of local rural users are
41 taken into consideration.

42

43 The modification suggested by the
44 Southcentral Alaska Subsistence Regional Advisory
45 Council would allow this requested delegation to sunset
46 after four years. However, because delegations of
47 authority are administrative in nature, the Board could
48 choose to reauthorize this delegation after the
49 four-year time period without having to go through the
50

0312

1 regulatory and public review process. Therefore, any
2 requested sunset period would be made moot by such
3 Board action.

4

5 Delegations of authority should be
6 viewed as a means to allow for long term and responsive
7 management of wildlife resources on the landscape.
8 Allowing for a sunset of this management tool might not
9 be in the best interests of the resource. Further,
10 before any delegated authority is initiated, the
11 Federal manager is required to coordinate with the
12 Southcentral and Eastern Interior Alaska Subsistence
13 Council Chairs and the Alaska Department of Fish and
14 Game prior to implementation of any management action
15 affecting the herd.

16

17 Thank you, Madame Chair.

18

19 MADAME CHAIR PITKA: Thank you very
20 much. Okay. At this time we're at Board discussion
21 with Council Chairs and the State Liaison. So please
22 discuss.

23

24 Thank you very much.

25

26 MR. MCKEE: Chris McKee, BLM. We
27 recognize -- and I want to reiterate what Karen Linnell
28 and Donald Mike said about expanding this to all of
29 Unit 13. When we initially submitted this proposal we
30 were really focusing on the areas that had the largest
31 amount of harvest by Federally-qualified users and that
32 was and continues to be 13A and 13B.

33

34 We're not necessarily opposed to
35 expanding it to all of Unit 13, but because that kind
36 of expansion did not go through public review process
37 and reviewed by the Council, we'd feel more comfortable
38 just keeping it to 13A and 13B for now and then moving
39 forward with the entire unit at a future date.

40

41 So I want to acknowledge what was said
42 by Ms. Linnell and Mr. Mike, but I just want to put
43 that on the record.

44

45 Thank you.

46

47 MADAME CHAIR PITKA: Thank you very
48 much. Okay. No more Board discussion? Greg, do you
49 have anything?

50

0313

1 MR. ENCELEWSKI: No. I'd still like to
2 see a sunset clause or see a review. We definitely
3 support the proposal, but we would like to see some
4 controls.

5
6 Thank you.

7
8 MADAME CHAIR PITKA: Thank you very
9 much. Now we're at Board motion, discussion and
10 action. Thank you very much, BLM. I appreciate that.

11
12 MR. MCKEE: Thank you. Again, for the
13 record, Chris McKee with BLM. Madame Chair, I move to
14 adopt Proposal WP24-09 to delegate authority to the BLM
15 Glennallen Field Office Manager to close, reopen and
16 adjust season dates, set harvest limits including any
17 needed sex restrictions and set any needed permit
18 conditions for caribou in Units 13A and 13B via
19 delegation of authority letter only.

20
21 That the Ahtna Intertribal Resource
22 Commission be consulted whenever any in-season
23 management actions may occur and that the harvest limit
24 for caribou in Units 13A and 13B be changed from two
25 caribou to up to two caribou.

26
27 If I get a second, I'll explain why I
28 intend to vote in support of my motion.

29
30 MS. CREACHBAUM: NPS seconds. Thank
31 you.

32
33 MR. MCKEE: Thank you. At this time
34 the only management authority available to BLM for
35 caribou in Units 13A and 13B is the ability to
36 determine the sex of the animals to be harvested.
37 Expanding the delegation of authority to include the
38 ability to close, reopen and adjust season dates, set
39 harvest limits and any needed sex conditions will
40 provide the BLM Glennallen Field Office Manager with
41 the ability to respond to changing herd and hunt
42 conditions in a timely manner.

43
44 In addition, adding the Ahtna
45 Intertribal Resource Commission into the consultation
46 process allows for an important entity representing
47 Federally-qualified subsistence users who rely on the
48 Nelchina Caribou Herd to be included in management
49 decisions.

50

0314

1 Currently, the Nelchina Caribou Herd is
2 facing severe population declines and it's important
3 for managers to be able to act quickly to properly
4 manage this herd during this decline and into the
5 future. Without this expanded delegated authority the
6 only in-season regulatory avenue available under
7 Federal regulations is a special action process which
8 requires a full analysis and action by the Board, which
9 can be time consuming.

10
11 The modification proposed by the
12 Southcentral Alaska Subsistence Regional Advisory
13 Council would allow this expanded management authority
14 to sunset after four years. Since Delegation of
15 Authority are administrative in nature, the Board could
16 reauthorize this delegation after the proposed sunset
17 period without having to go through any regulatory or
18 public review process.

19
20 Delegations of Authority are a means by
21 which Federal managers can respond to changing
22 conditions of wildlife resources in a timely manner,
23 which is especially important now given the status of
24 the Nelchina Caribou Herd. Therefore, BLM believes
25 that allowing this Delegation of Authority to sunset
26 during a period when there are concerns about the
27 Nelchina population would violate recognized principles
28 of Fish and Wildlife conservation.

29
30 Any management actions taken by the BLM
31 Glennallen Field Office Manager can only be initiated
32 after coordination with the Chairs of the Southcentral
33 and Eastern Interior Alaska Subsistence Regional
34 Advisory Councils, the Alaska Department of Fish and
35 Game and, should this proposal be adopted, the Ahtna
36 Intertribal Resource Commission.

37
38 Thank you, Madame Chair.

39
40 MADAME CHAIR PITKA: Thank you very
41 much for that justification. Does anybody have any
42 questions or any further discussion?

43
44 (No comments)

45
46 MR. VANORMER: Forest Service calls the
47 question.

48
49 MADAME CHAIR PITKA: Thank you very
50

0315

1 much, Forest Service. I really appreciate that. Can
2 we have a roll call vote, please.

3

4 MS. HOWARD: Certainly. Thank you,
5 Madame Chair.

6

7 Starting with the maker of the motion,
8 Bureau of Land Management, Chris McKee.

9

10 MR. MCKEE: BLM supports for the
11 reasons we explained. Thank you.

12

13 MS. HOWARD: Thank you.

14

15 Bureau of Indian Affairs, Jolene John.

16

17 MS. JOHN: I'm going to ask to be
18 called last again. Thank you.

19

20 MS. HOWARD: Certainly.

21

22 Fish and Wildlife Service, Sara Boario.

23

24 MS. BOARIO: Fish and Wildlife Service
25 supports for the reasons articulated by my colleague
26 from the Bureau of Land Management. Expanding the
27 Delegation of Authority will provide the BLM Glennallen
28 Field Office Manager the ability to respond to changing
29 herd and hunt conditions in a timely manner.

30

31 Adding the Ahtna Intertribal Resource
32 Commission to the consultation process allows for an
33 important entity representing Federally-qualified
34 subsistence users who rely on the Nelchina Caribou Herd
35 to be included in management decisions and current
36 conservation concerns the Nelchina Caribou Herd is
37 facing.

38

39 Thank you.

40

41 MS. HOWARD: Thank you.

42

43 National Park Service, Sarah
44 Creachbaum.

45

46 MS. CREACHBAUM: The National Park
47 Service supports WP24-09 for the reasons stated by BLM.
48 Expanding the delegation of authority to include the
49 ability to close, reopen and adjust season dates, set
50

0316

1 harvest limits and any needed permit conditions will
2 provide the BLM Glennallen Field Office Manager with
3 the ability to respond to changing herd and hunt
4 conditions in a timely manner.

5

6 This will be an important tool to take
7 quick management action when needed, especially in
8 current times with the sudden recent population decline
9 of the Nelchina Caribou Herd. The requirement that the
10 BLM Glennallen Field Office Manager consult and
11 coordinate with the effective RAC Chairs, ADF&G, and
12 the Ahtna Intertribal Resource Commission ensures that
13 all parties would be informed and be a part of the
14 decision-making process.

15

16 MS. HOWARD: Thank you.

17

18 USDA Forest Service, Chad VanOrmer.

19

20 MR. VANORMER: The Forest Service
21 supports WP24-09 as submitted by the BLM for the
22 reasons stated by the BLM, the Park Service and the
23 Fish and Wildlife Service. Thank you.

24

25 MS. HOWARD: Bureau of Indian Affairs,
26 Jolene John.

27

28 MS. JOHN: The Bureau of Indian Affairs
29 will oppose. BIA will be siding with the Southcentral
30 Regional Advisory Council's recommendation for there to
31 be a sunset clause for the Delegation of Authority
32 granted to the BLM on this case.

33

34 Thank you.

35

36 MS. HOWARD: Thank you. Then Chair
37 Pitka, the proxy vote for Public Member Charlie Brower.

38

39 MADAME CHAIR PITKA: Public Member
40 Charlie Brower supports Proposal 24-09, delegating
41 authority to manage the -- the Nelchina hunt provides
42 management flexibility to quickly respond to changing
43 herd and hunt conditions. That is from the
44 justification on Page 961 of the Board book.

45

46 Thank you.

47

48 MS. HOWARD: Thank you.

49

50

0317

1 And Chair Pitka, your vote.

2

3 MADAME CHAIR PITKA: I support for the
4 reasons stated.

5

6 MS. HOWARD: Thank your. The motion
7 passes unanimously with 6 yeas, 1 nay.

8

9 MADAME CHAIR PITKA: Thank you very
10 much. I appreciate it. Okay. Unit 8 deer, WP24-11 in
11 the supplemental.

12

13 UNIDENTIFIED SPEAKER: Madame Chair.

14

15 MADAME CHAIR PITKA: Yes.

16

17 UNIDENTIFIED SPEAKER: Just quickly
18 referencing what we stated earlier, are we going to
19 pick up WP24-25?

20

21 MADAME CHAIR PITKA: Oh, yes. Sorry.
22 It was going to be after WCR24-04/06. Thank you. We
23 will take it up, but it may be a little bit later.
24 Sorry about that.

25

26 MS. HOLMAN: Good afternoon, Madame
27 Chair. Members of the Council. My name is Kendra
28 Holman and I'm a wildlife biologist with the Office of
29 Subsistence Management. This is a shortened version of
30 the analysis for Wildlife Proposal WP24-11 submitted by
31 the Kodiak National Wildlife Refuge. It can be found
32 in your supplemental material under Tab 1.

33

34 This proposal requests the restriction
35 on antlerless deer harvest in Unit 9 be eliminated.
36 The proponent states that the prohibition on harvest of
37 antlerless deer between August 1st and September 30th
38 unnecessarily limits deer harvest opportunity by the
39 residents of Unit 8 as there's no biological basis for
40 this restriction.

41

42 According to the proponent, the current
43 regulation that was set in 2002 was based on anecdotal
44 information indicating that the deer population had
45 crashed in response to severe winters in the late
46 1990s.

47

48 The Refuge has done some winter browse
49 surveys indicating that the population is not decreased

50

1 at this time. In conclusion, the effects of this
2 proposed change would be to increase harvest
3 opportunity for rural residents with no substantive
4 effect on deer harvest, deer survival or population
5 size expected.

6
7 So 2002 the Board adopted Proposal
8 WP02-22 simplifying the hunt area description from
9 three hunts into one area and that was also when the
10 Board set the harvest limit of three deer and revised
11 the antlerless deer season, shortening it to start
12 October 1st to November 30th.

13
14 The deer population had not recovered
15 from harsh winters of 1997-1998 and 1998-1999 and would
16 not have been able to sustain the harvest of five deer
17 at that time. In 2006 the deer antlerless season
18 started in October 1st to align with State regulations.

19
20 In March 2023 the Alaska Board of Game
21 adopted Proposal 73 as amended, reducing the
22 non-resident harvest limit for deer in Unit 8 to one
23 buck while retaining the resident harvest limit of
24 three deer in Unit 8 remainder. In the past five years
25 there has been a large increase in the number of
26 non-resident hunters for deer in Unit 8. These hunters
27 specifically harvest from the beach areas, leading to
28 declines in the population in those areas.

29
30 The deer population in Unit 8 are
31 generally the highest in the southern one-third of
32 Kodiak Island. Deer abundance on the island is
33 primarily a function of winter severity at low
34 elevations, which is the deer's typical winter range.
35 Deer population can decline sharply following a series
36 of severe winters, but may also recover rapidly when
37 the winters become more favorable.

38
39 ADF&G has not conducted specific
40 activities for deer populations since 2001; however,
41 they have monitored and assessed the deer population by
42 using other metrics such as harvest monitoring, hunter
43 success and effort and winter mortality surveys.

44
45 Since 2010 there have been two severe
46 winters and one moderately severe winter. The
47 regulatory year following these three winters had a
48 harvest number drop of 51 to 63 percent. This can be
49 found on Table 2 in the analysis. These low harvest
50

0319

1 numbers are indicative of the heavy influence the
2 severe winter weather has on deer population in Unit 8.

3
4 Many Federally-qualified subsistence
5 users prefer to wait until late in the season to hunt
6 when snow is at higher elevations, forcing deer to
7 concentrate at lower elevations on the beach, making
8 them easier to find, harvest and transport by boat.

9
10 Unit 8 residents' harvest average has
11 decreased by 7 percent over the last five years when
12 compared to the previous five years. Non-resident and
13 non-local resident or non-Federally-qualified users
14 combined harvest has increased 66 percent over the
15 regulatory years 2017 to 2021, compared to 60 percent
16 that it was the previous five years. So it went from
17 60 percent to 66. This can be found in Table 3.

18
19 Annual harvest has not reached the
20 8,000 to 8,500 deer objective in the management plan
21 since 2016. Removing restrictions on the antlerless
22 deer harvest will allow Federally-qualified subsistence
23 users to harvest antlerless deer throughout the entire
24 season, including August and September.

25
26 The Unit 8 deer population overall does
27 not have a conservation concern, but at a micro-scale
28 there are concerns for the deer populations along the
29 beaches. However, winter browse surveys conducted by
30 Kodiak National Wildlife Refuge indicate that overall
31 the population has not decreased.

32
33 The proposal provides additional
34 opportunity for deer harvest in Unit 8 by Federally-
35 qualified subsistence users and overall deer population
36 does not currently have that conservation concern.

37
38 The OSM preliminary conclusion is to
39 support WP24-21.

40
41 MADAME CHAIR PITKA: Thank you very
42 much. At this time does anybody have any questions on
43 the analysis.

44
45 (No comments)

46
47 MADAME CHAIR PITKA: Okay. Seeing
48 none. Can we get a summary of the written public
49 comments, please.

50

0320

1 MS. HOLMAN: Madame Chair. There were
2 no written public comments received on this proposal.

3
4 MADAME CHAIR PITKA: Thank you very
5 much. Can we get a summary of the tribal and the ANCSA
6 Corporation consultation, please.

7
8 MR. LIND: Madame Chair. Orville Lind,
9 Native Liaison for OSM. There were no questions or
10 comments on the proposal. Thank you.

11
12 MADAME CHAIR PITKA: Okay. So at this
13 time I'd like to open the floor for the tribal, native
14 organization and ANCSA corporation testimony.

15
16 (No comments)

17
18 MADAME CHAIR PITKA: Okay. It doesn't
19 look like it online, right? Okay. Thank you. So we'd
20 like to open the floor to public testimony.

21
22 I'm sorry. I skipped advisory
23 testimony. State ACs, SRCs and working groups.

24
25 (No comments)

26
27 MADAME CHAIR PITKA: Okay. I'd like to
28 open the floor to public testimony then.

29
30 (No comments)

31
32 MADAME CHAIR PITKA: Is there anybody
33 online.

34
35 (No comments)

36
37 MADAME CHAIR PITKA: I haven't gotten
38 any comment cards either. Regional Advisory Council
39 recommendations, please.

40
41 MS. SKINNER: This is Rebecca Skinner.
42 Can you hear me?

43
44 MADAME CHAIR PITKA: Yes, I can. Thank
45 you very much and thank you for calling in.

46
47 MS. SKINNER: This is Rebecca Skinner,
48 Chair of the Kodiak/Aleutians RAC. As I mentioned in
49 my report a couple days ago, this is a proposal that
50

0321

1 our Council discussed twice; once at our fall 2023
2 meeting and then at our March 2024 meeting.

3

4

5 The Kodiak/Aleutians Subsistence
6 Regional Advisory Council voted to support WP24-11 at
7 their fall 2023 meeting with modification to retain the
8 antlerless restrictions and to increase the harvest
9 limit to four deer. The Council voted to modify the
10 proposal by retaining the antlerless restriction and
11 increasing the harvest limit from three deer to four
12 deer.

12

13

14 Influenced by wildlife reports
15 indicating a robust deer population in Unit 8, the
16 Council expressed support for the proposal to provide
17 more harvest opportunity. However, the Council
18 acknowledged concerns regarding the potential
19 inadvertent harvesting of fawns, a practice contrary to
20 holistic values that prohibit the harvest of does and
21 their offspring.

21

22

23 Given that newborn fawns are commonly
24 delivered as early as mid-June, there is apprehension
25 that an earlier extension of the antlerless season may
26 lead to the unintended harvesting of does with young
27 fawns, potentially orphaning these vulnerable
28 offspring.

28

29

30 Additionally, lifting the current
31 restrictions on antlerless deer harvest raises the
32 prospect of capturing late-born fawns. Consequently,
33 instead of extending the antlerless season, the Council
34 recommended increasing the overall deer harvest limit
35 while preserving the antlerless restrictions that
36 antlerless deer may be taken only from October 1 to
37 January 31st.

37

38

39 The modified regulations should read:
40 Unit 8 deer August 1st- January 31st. All lands
41 within the Kodiak Archipelago within the Kodiak
42 National Wildlife Refuge, including lands on Kodiak,
43 Ban, Uganik and Afognak Islands, four deer. However,
44 antlerless deer may be taken only from October 1 -
45 January 31st.

45

46

47 At our winter 2024 meeting we received
48 feedback that per the Administrative Procedures Act, or
49 APA, adequate notice and opportunity for public comment
50 is required on regulatory proposals and that the

50

0322

1 modifications we made might have been beyond what a
2 reasonably well-informed member of the public would
3 anticipate and that there had not been adequate
4 opportunity for comment.

5
6 The Kodiak/Aleutians Council
7 reconsidered this proposal at their winter 2024 meeting
8 to address concerns over adequate public notice for the
9 modification recommended by the Council at their fall
10 2023 meeting. During their reconsideration the Council
11 expressed their desire to maintain the same
12 recommendation as before.

13
14 We do not support increasing the
15 harvest of antlerless deer by removing the language
16 recommended in the original proposal. The Council
17 continues to support providing additional opportunities
18 for users by increasing the harvest limit while
19 preserving the antlerless restriction.

20
21 After reconsidering their
22 recommendation at our second meeting in March of 2024,
23 it was determined that the public had now been provided
24 adequate notice and opportunity for comment, meeting
25 the requirements of the APA.

26
27 That concludes my report.

28
29 MADAME CHAIR PITKA: Thank you very
30 much. Does anybody have any questions for Rebecca.

31
32 (No comments)

33
34 MADAME CHAIR PITKA: Alaska Department
35 of Fish and Game comments. State Liaison, Ben
36 Mulligan. Thank you.

37
38 MR. MULLIGAN: Thank you, Madame Chair.
39 The Alaska Department of Fish and Game opposes this
40 proposal as we feel it has the potential to create a
41 conservation concern by removing the prohibition on
42 taking of antlerless deer within the unit and that
43 means the harvest of female deer.

44
45 It is widely known and supported by
46 scientific literature that the harvest of female deer
47 has a negative effect on population growth. More
48 specifically, hunter harvest of female deer regulates
49 population size.

50

0323

1 Because we still hear from locals that
2 have concerns regarding the reduction in deer abundance
3 and harvest opportunity, an increase in female deer
4 harvest should be carefully considered as this proposal
5 could slow population growth and lead to prolonged
6 population recovery times after experiencing any severe
7 winter events.

8
9 I would note that we are working on
10 conducting research to better understand the use of
11 habitat by deer, their diet and seasonal movements.
12 When we do see that information published, we'd be more
13 than happy to share it with all parties involved.

14
15 Thank you, Madame Chair.

16
17 MADAME CHAIR PITKA: Thank you. I'm
18 looking forward to that. At this time we would -- yes,
19 ma'am, go ahead.

20
21 MS. BOARIO: I was just going to ask a
22 question.

23
24 MADAME CHAIR PITKA: Please ask your
25 question.

26
27 MS. BOARIO: Madame Chair, thank you.
28 Mr. Mulligan, I believe those were your comments on the
29 proposal as originally submitted. Does the State have
30 comments on the modification as just presented by the
31 RAC?

32
33 MR. MULLIGAN: Through the Chair. No,
34 Member Boario. As described, the last time we engaged
35 it was outside that scope, so we didn't take any
36 further analysis on the increase of what would be buck
37 harvest.

38
39 MADAME CHAIR PITKA: Thank you.
40 InterAgency Staff Committee unless there's further
41 questions.

42
43 (No comments)

44
45 MS. LAVINE: Thank you, Madame Chair.
46 The InterAgency Staff Committee provided their standard
47 comment. Thanks.

48
49 MADAME CHAIR PITKA: Thank you. Now
50

0324

1 we're at Board discussion with Council Chairs and the
2 State Liaison. So please ask your questions and
3 discuss right now.

4
5 Rebecca, if you have any additional
6 comments, right now would be the time. Thank you so
7 much.

8
9 MS. SKINNER: I don't have any
10 additional comment. Thank you.

11
12 MADAME CHAIR PITKA: Thank you. Okay,
13 we're at Board motion, discussion and action at this
14 time.

15
16 MS. BOARIO: Madame Chair. Fish and
17 Wildlife Service. I move to adopt Wildlife Proposal
18 24-11. If I get a second, I will explain why I intend
19 to support with the Kodiak/Aleutian Council's
20 modification.

21
22 MR. VANORMER: The Forest Service
23 seconds.

24
25 MS. BOARIO: Thank you very much.
26 Madame Chair. This proposal was submitted to add
27 additional subsistence harvest opportunity for
28 harvesting deer in Unit 8 on Kodiak Island for
29 subsistence hunters. The modified proposal increases
30 the harvest limit from three to four deer.

31
32 Both the OSM analysis and the Council
33 noted the original proposal to eliminate the antlerless
34 deer restriction may increase the harvest of does with
35 fawns during the early season, but the specific comment
36 from the Council that Alutiiq values prohibit the
37 harvest of does and their offspring.

38
39 This modification recommends an
40 alternative method to increase the harvest limit while
41 preserving the restriction that antlerless deer may
42 only be taken from October 1 to January 31.

43
44 Results of Kodiak National Wildlife
45 Refuge surveys indicate that intensive deer use of key
46 winter browse first documented in 2017 was sustained
47 through 2022, which suggests that the population has
48 not decreased and the Department of Fish and Game's
49 comment shared that recent surveys and reports from
50

0325

1 hunters and guides indicate the deer population
2 throughout the Archipelago has largely recovered.

3
4 The OSM analysis concludes there are no
5 conservation concerns for the overall Unit 8 deer
6 population. This proposal would benefit
7 Federally-qualified users with little impact expected
8 on the Unit 8 deer population.

9
10 Thank you, Madame Chair.

11
12 MADAME CHAIR PITKA: Thank you very
13 much. So does anybody have any questions about that or
14 any further discussion?

15
16 MS. JOHN: Question. Thank you.

17
18 MADAME CHAIR PITKA: Can we have a roll
19 call vote, please.

20
21 MS. HOWARD: Certainly. Thank you,
22 Madame Chair.

23
24 Starting with the maker of the motion,
25 Fish and Wildlife Service, Sara Boario.

26
27 MS. BOARIO: Support.

28
29 MS. HOWARD: Thank you. Bureau of
30 Indian Affairs, Jolene John.

31
32 MS. JOHN: Bureau of Indian Affairs
33 adopts the Kodiak/Aleutian Islands RAC recommendation.
34 Harvesting of does is not a traditional activity and
35 allowing summer harvest of does could result in orphan
36 fawns, which can impact their survival. Increasing the
37 bag limit for bucks will allow users to better meet
38 subsistence needs.

39
40 MS. HOWARD: Thank you.

41
42 Bureau of Land Management, Chris McKee.

43
44 MR. MCKEE: BLM votes to support
45 WP24-11 as modified by the Kodiak/Aleutians Subsistence
46 Regional Advisory Council. This proposal would provide
47 additional opportunity to harvest deer by Federally-
48 qualified subsistence users and there's currently no
49 conservation concern for this population.

50

0326

1 Extension of the antlerless season,
2 however, could result in the harvest of does with young
3 fawns, which is contrary to Alutiiq values.

4
5 Thank you, Madame Chair.

6
7 MADAME CHAIR PITKA: Thank you very
8 much.

9
10 MS. HOWARD: National Park Service,
11 Sarah Creachbaum.

12
13 MS. CREACHBAUM: Madame Chair. The
14 National Park Service supports WP24-11 with the
15 Kodiak/Aleutian Council modification for the reasons
16 stated by the Fish and Wildlife Service. The proposal
17 as modified will support increased subsistence
18 opportunity. The modification recommends an
19 alternative method to increase the harvest limit while
20 preserving the restriction that antlerless deer may
21 only be taken from October 1 to January 31st,
22 protecting harvest of does and fawns in the early
23 season.

24
25 MS. HOWARD: Thank you.

26
27 Forest Service, Chad VanOrmer.

28
29 MR. VANORMER: Madame Chair. The
30 Forest Service supports WP24-11 with the
31 Kodiak/Aleutian Islands Council modification to retain
32 antlerless restriction between August 1st and September
33 30th to does with young fawns and fawns and increase
34 the harvest limit from three to four deer in Unit 8.

35
36 Our justification is the deer
37 population in Unit 8 is healthy and robust and the
38 harvest objectives from the management plan has not
39 been reached since 2016. The proposal provides
40 additional opportunity for deer harvest in Unit 8 by
41 Federally-qualified subsistence users.

42
43 Thank you, Madame Chair.

44
45 MS. HOWARD: Thank you. Chair Pitka, I
46 believe you have Public Member Brower's proxy vote.

47
48 MADAME CHAIR PITKA: Yes, I do still
49 have his proxy vote. Public Member Brower supports
50

0327

1 24-11 with the modification to retain the antlerless
2 restrictions.

3

4

5 There's no page number on this, but
6 this is the supplement under the analysis and it's the
7 analysis for the Kodiak/Aleutians Subsistence Regional
8 Advisory Council.

8

9

Thank you.

10

11

MS. HOWARD: Thank you.

12

13

And for your vote, Chair Pitka.

14

15

16

MADAME CHAIR PITKA: Yes, I support.
Thank you. Sorry. I support with the RAC modification
as stated earlier by Public Member Brower's proxy.

17

18

19

MS. HOWARD: Thank you. Motion passes
unanimously.

20

21

22

23

MADAME CHAIR PITKA: Thank you very
much. So this seems like a very good time to take a
15-minute break. So that puts us returning at 3:10
promptly. Thank you very much.

24

25

26

(Off record)

27

28

29

(On record)

30

31

MADAME CHAIR PITKA: Welcome back.

32

We'll go with Kendra.

33

34

35

MS. HOLMAN: Good afternoon, Madame
Chair, Members of the Council. This will be Wildlife
Proposals 24-12/13/14. They're all one analysis. They
can be found starting on Page 979 of your meeting book.

36

37

38

39

WP24-12 was submitted by Jake Fries of
Port Alsworth, Proposal WP24-13 was submitted by Warren
Hill and Proposal WP24-14 was submitted by the Lake
Clark National Park Subsistence Resource Commission.
All three of these proposals request to extend the
fall moose season in Unit 9B by five days at the end of
the season from September 20th to September 25th.

40

41

42

43

In 2022 the Board of Game adopted
Proposal 204 to lengthen the fall moose season in Unit
9B by five days, closing September 25th instead of

44

45

46

47

48

49

50

1 September 20th. The moose population appears s to be
2 healthy, with high bull:cow and calf:cow ratios, as
3 well as high twinning rates, and good body condition of
4 captured moose.

5
6 Since the early twentieth century,
7 moose on the Alaska Peninsula gradually expanded their
8 range southwestward. Assessment of moose population
9 status and trends in Unit 9 is difficult for several
10 reasons, including low moose density and snow and
11 weather conditions that are frequently inadequate for
12 surveys.

13
14 The past two composition surveys
15 indicate that the bull:cow ratio is at or just below
16 the biological objective, which can be found on Table 1
17 on Page 985 of your book.

18
19 Harvest in Unit 9B averages 40 moose
20 annually from 2003 to 2021. Local harvest, defined as
21 harvest by residents of Unit 9, averaged 36 moose per
22 year from 2013 to 2021. Also found on Table 2 on Page
23 988 of your meeting book.

24
25 Since 2022, moose hunters in Unit 9B
26 under State regulations have had a longer fall hunting
27 season than Federally-qualified subsistence users.

28
29 If this proposal is adopted, the
30 Federal fall moose season in Unit 9B would be extended
31 by five days, closing September 25 instead of September
32 20. This extension would provide Federally-qualified
33 subsistence users with more hunting opportunity and
34 greater access to the resource under Federal
35 regulations.

36
37 The only Federally-qualified
38 subsistence users in the resident zone communities may
39 hunt within the National Parks, so this season
40 extension may increase moose harvest in the portion of
41 Lake Clark National Park within Unit 9B.

42
43 The bull:cow ratio is above objectives
44 indicating that there are additional animals available
45 for harvest. The Federal and State do not align since
46 the Board of Game extended the season for Unit 9B moose
47 in 2022. Extending the Federal season dates to match
48 the State season provides additional subsistence
49 opportunity, particularly on National Park Service
50

0329

1 lands and reduces regulatory complexity by aligning the
2 State and Federal seasons.

3

4 The OSM conclusion was to support this
5 proposal.

6

7 MADAME CHAIR PITKA: Thank you very
8 much. Does anybody have any questions of the analysis
9 at this point.

10

11 (No comments)

12

13 MADAME CHAIR PITKA: Okay. Can we get
14 a summary of the written public comments.

15

16 MS. HOLMAN: Madame Chair. One comment
17 was received on these proposals. The comment submitted
18 was by Bristol Bay Native Corporation supported the
19 extension of the season by five days to align with the
20 State's open season and avoid user confusion between
21 the State and Federal hunting seasons.

22

23 MADAME CHAIR PITKA: Thank you very
24 much. Can we get the summary of tribal and ANCSA
25 corporation consultations.

26

27 MR. LIND: Thank you, Madame Chair.
28 Orville Lind, Native Liaison for OSM. We did not have
29 any questions or comments on WP24-12/13/14.

30

31 Thank you, Madame Chair.

32

33 MADAME CHAIR PITKA: Thank you very
34 much. So at this time I'd like to open the floor for
35 tribal and Native organization testimony.

36

37 MR. SALMON: Good afternoon. Jonathan
38 Salmon from Igiugig Village Council here.

39

40 MADAME CHAIR PITKA: Oh, hi, Jonathan.
41 We have somebody at the podium right now and then we'll
42 go to you next. Thank you so much.

43

44 MR. SALMON: Thank you.

45

46 MR. OLYMPIC: Hello. My name is Henry
47 Olympic. I'm from Newhalen. I'm the Newhalen Tribal
48 Council president there. I am in support of this, but
49 the only thing I'm asking for would be if we can open
50

0330

1 the season August 20th instead of going later.

2

3 A couple of reasons was in our school
4 district there, the Lake and Peninsula School District,
5 we go by a subsistence calendar. The kids don't start
6 school until the first week in September. We've
7 already had, you know, for cuts, the funding cuts for
8 the kids going to school. I mean if you go a little
9 bit earlier, kids wouldn't be missing school. A lot of
10 the families out there and the high school kids they do
11 subsist for moose.

12

13 The quality of the meat is way better
14 than in the August months there instead if you go
15 toward the end of the season the moose is starting to
16 rut and nobody is going to want rut moose.

17

18 Another part is if we open up sooner
19 too, the earlier for us, the residents, it would be
20 like -- because we've got a lot of hunting lodges out
21 there. They fly in hunters and do a lot of hunting.
22 They have an advantage over all the local hunters. They
23 have their own planes and they know where all the moose
24 are. The local people out there, we actually got to go
25 on our four-wheelers and go out there and look for the
26 moose. They're all about just getting antlers and
27 we're just trying to -- we need the meat.

28

29 The other thing about it is if we can
30 -- because you got our neighboring units that they open
31 their season August 20th also. It would be good to
32 align all the units in that area with the same time.

33

34 Thank you.

35

36 MADAME CHAIR PITKA: Thank you very
37 much. Jonathan Salmon.

38

39 MR. SALMON: Thank you again. Jonathan
40 Salmon from Igiugig Village Council. Henry Olympic
41 there, the neighbor to the north, just now touched on a
42 lot of the topics that I also wanted to touch on. I
43 wanted to clarify it's super important to us to have
44 that differentiation of subsistence versus sport
45 hunting. When we start on the 1st, even though the
46 non-residents are starting on the 5th, the airplanes
47 are already flying overhead.

48

49 This last season it was really apparent

50

0331

1 because as I was out trekking across the tundra and I
2 must have had four planes fly over me in the morning
3 and they're setting up their camps. I just think it's
4 very important to have that extra five days at the
5 beginning to allow subsistence a priority before sport
6 hunts start.

7

8 Thank you.

9

10 MADAME CHAIR PITKA: Thank you very
11 much. I appreciate that. Gayla Hoseth.

12

13 MS. HOSETH: Thank you, Madame Chair
14 and members of the Council. For the record, my name is
15 Gayla Hoseth and I'm representing Bristol Bay Native
16 Association. I'm the director of Natural Resources and
17 I just wanted to acknowledge our president of our board
18 is also here, Tony Gregorio, and also our president and
19 CEO Garvin Federenko are present in the audience.

20

21 I just wanted to elaborate on -- first
22 of all I just wanted, for clarification, when we engage
23 in tribal consultation at the beginning of the day I
24 know that tribes have also commented on that and I
25 guess understanding the process of when we do testify
26 during tribal consultation, if that's a part of the
27 record during that time, and we weigh in on proposals.

28

29 Just so you also know Bristol Bay
30 Native Association represents 31 tribes in the Bristol
31 Bay Region and BBNA supports with the modification with
32 the hunt start date of August 20th, 2024. We support
33 President Olympic's request from the Newhalen Tribal
34 Village Council with that start date of August 20th.
35 Then we also acknowledge OSM's support with their
36 conclusion to start on August 27 as well as the RAC to
37 start five days earlier. Also the SRC.

38

39 I really think that it's important --
40 as we heard testimonies throughout this meeting how
41 important it is for people to have access to make sure
42 that they get a moose. So moving that hunt date to
43 August 20th would really be beneficial for the people
44 of this region and these Game Management Units
45 because.....

46

47 (Phone interruption)

48

49 MADAME CHAIR PITKA: My apologies.

50

0332

1 Sorry about that, Gayla.

2

3

4 MS. HOSETH: That's okay. So I just
5 want to reiterate that it's really important if we can
6 start on August 20th. I know that another Game
7 Management Units in the Bristol Bay Region on the State
8 regs it is starting on August 20th Earlier for local
9 resident hunters and I know that's different for
10 resident and non-resident, but here we're talking about
11 real subsistence. We don't see anything as to why it
12 really shouldn't go to an earlier hunt date in the
13 requests that were made.

13

14

15 Also just to -- I believe it's in 9C in
16 the current regs, which is just adjacent to 9B, they do
17 start on August 20th. When you look in the State
18 Regulatory Manual for 9B and C, they're lined up with
19 their dates. I also know that after this meeting we
20 will be submitting a Board of Game proposal to modify
21 that date to hunt earlier.

21

22

23 Thank you, Madame Chair.

23

24

25 MADAME CHAIR PITKA: Thank you very
26 much for that. Oh, sorry, I didn't answer about the --
27 I nodded my head when you asked about would the Tribal
28 Consultation at the beginning of the meeting be added
29 to the record. Yes, it will, but it's just not
30 particularly added to the summary at the beginning of
31 this meeting because they haven't had time to prepare
32 it. But it will be added to the administrative record.

32

33

34

35 Thank you.

35

36

37 MS. HOSETH: Thank you for that
38 clarification, Madame Chair. I just think it's really
39 something to consider when we are taking notes and we
40 are during that Tribal Consultation portion when we do
41 testify as tribes and as leaders and as our own
42 governments. That is a part of this record and not
43 have to wait for an outcome. It's really important
44 when the decision-makers are making that decision when
45 we do testify during consultation on that, outside of
46 the telephone, online consultation portion. I think
47 that that's very important.

47

48

49 Thank you.

49

50

0333

1 MADAME CHAIR PITKA: Thank you very
2 much for that. Was there somebody else on the phone or
3 was that background noise? I could not tell.

4
5 (No comments)

6
7 MADAME CHAIR PITKA: Okay. If not,
8 advisory group testimony, State ACs, SRCs, working
9 groups and et cetera.

10
11 MS. PATTON: Good afternoon, Madame
12 Chair and members of the Board. For the record, Eva
13 Patton with the National Park Service Subsistence
14 Program. We did have a comment from the Aniakchak
15 Subsistence Resource Commission. They have communities
16 with C&T in this area.

17
18 The Aniakchak SRC supports
19 WP24-12/13/14 with modification to add five days to the
20 beginning of the fall moose season in Unit 9B. Adding
21 five days to the beginning of the season rather than to
22 the end will provide more opportunity for subsistence
23 harvest prior to the rut.

24
25 Thank you, Madame Chair.

26
27 MADAME CHAIR PITKA: Thank you very
28 much and thank them for their comment. At this time
29 I'd like to open the floor to public testimony. I have
30 one card in front of me and that is Mr. Donald Mike.
31 Thank you very much.

32
33 MR. MIKE: Thank you, Madame Chair.
34 Members of the Board and members of the Regional
35 Advisory Councils here. I support the proposal with
36 the RAC modification, 24-12/13/14 as modified. My
37 initial response to this proposal was to support the
38 Council's recommendation.

39
40 On this specific proposal the Council
41 discussed this proposal with Lake Clark SRC, Nondalton
42 Tribe and local subsistence users that supported a
43 five-day extension at the beginning of the season. The
44 Council has done due diligence in their work to include
45 all subsistence users.

46
47 Then I would like to support the
48 position of Mr. Olympic from the Newhalen Tribe to open
49 the season early to August 20th. That would allow them
50

0334

1 -- with the current high gas prices that would allow
2 them to gather subsistence resources that include wild
3 plants, berries and other finfish species that are
4 available to them.

5
6 So I support the BBNA and Mr. Olympic
7 from Newhalen to extend -- open the season earlier to
8 August 20th.

9
10 Thank you.

11
12 MADAME CHAIR PITKA: Thank you so much
13 for your comments. I appreciate it. Is there anything
14 else? I don't see anybody else for public testimony.
15 So at this time can we go to the Regional Advisory
16 Council recommendations, please.

17
18 MR. DUNAWAY: Thank you, Madame Chair.
19 Dan Dunaway, Vice-Chair of Bristol Bay Regional
20 Advisory Council. Again, extending the moose season in
21 Unit 9B, we voted to support it with the modification
22 to add five days to the beginning instead of the end of
23 the season. Again, as folks have been saying, August
24 20.

25
26 Council made the suggestion as access
27 is easier earlier in the season because water levels
28 tend to rise later in the fall and that limits access.
29 I think it's harder for some folks to cross creeks and
30 other places.

31
32 Five days in the beginning of the
33 season is also more desirable since the meat is more
34 palatable earlier in the season than the end of the
35 season when bulls can start being rutty.

36
37 The proposal was discussed with the
38 Lake Clark SRC and Nondalton. Local subsistence users
39 supported a five-day extension at the beginning. I
40 just kind of want to add I kind of threw out a thing on
41 Facebook amongst some of my friends around Lake
42 Iliamna. I got a real lesson in when the meat is right
43 to eat. It was in no uncertain terms.

44
45 Frankly, years ago when I was just a
46 beginner and riding around Lake Iliamna with the
47 Fisheries Research Institute folks heard that I had
48 worked for Fish and Game and they started yelling at me
49 about the change in the season back in 1975. I was
50

0335

1 just a summer worker back then, but I've never
2 forgotten the scolding I got.

3

4 So I think that's sufficient.

5

6 Thank you.

7

8 MADAME CHAIR PITKA: Thank you so much
9 for that. Is there any questions for the Regional
10 Advisory Council? Yes, Member Creachbaum.

11

12 MS. CREACHBAUM: I am trying to get
13 clarification because the language I have here says
14 that adding five days on would be August 27th, not
15 August 20th. So I just want to get clarification on
16 that before we go any further.

17

18 MR. DUNAWAY: Good point, yes. Our
19 summary here just says add five days to the beginning.
20 I hadn't really calculated it out. That would be 10
21 days if we were to go to the 20th. I would look to
22 especially Mr. Olympic and possibly Mr. Salmon that was
23 online for the folks that are in area. I would be
24 happy to support whatever they prefer.

25

26 Thank you.

27

28 MADAME CHAIR PITKA: Kendra, did you
29 have something to add?

30

31 MS. HOLMAN: I was just going to say it
32 is -- what was considered in the analysis was five days
33 at the end and what was discussed at the Regional
34 Advisory Council meeting was the five days at the
35 beginning. I don't believe a specific date was
36 discussed. Just the additional five days at the
37 beginning. So just for that clarification.

38

39 MADAME CHAIR PITKA: Okay. Thank you.

40

41 Ken has something.

42

43 MR. LORD: Yeah, I'd just like to be
44 clear. Do you think that five days would provide a
45 meaningful preference?

46

47 MR. DUNAWAY: Yes, sir. Through the
48 Chair. Billy Trefon is one of our RAC members from
49 Nondalton and he was adamant on that. I think he'd

50

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1 gotten his orders from the other villages as well.

2

3

Thank you.

4

5 MADAME CHAIR PITKA: Member Creachbaum,
6 did you have something else?

7

8 MS. CREACHBAUM: Maybe in a minute.

9

10 MADAME CHAIR PITKA: Okay. Does
11 anybody else have any questions.

12

13

(No comments)

14

15 MADAME CHAIR PITKA: Okay. If not,
16 Alaska Department of Fish and Game comments, please.

17

18 MR. MULLIGAN: Thank you, Madame Chair.
19 The Alaska Department of Fish and Game is neutral on
20 the proposal as written. As you know, we have a
21 long-standing history of commenting that alignment of
22 State and Federal regs is preferred to reduce user
23 competition or user confusion, sorry. So we would
24 prefer to align with our regs.

25

26

Thank you.

27

28 MADAME CHAIR PITKA: Thank you.
29 InterAgency Staff Committee comments, please.

30

31 MS. LAVINE: Thank you, Madame Chair.
32 Wildlife proposal WP24-12/13/14 proposes to extend the
33 fall moose season in Unit 9B. The Bristol Bay
34 Subsistence Regional Advisory Council suggests
35 modifying the proposal by adding the five-day season
36 extension at the beginning of the hunting season when
37 access is easier due to water levels and the meat is
38 more palatable prior to the rut.

39

40 The proposal was discussed with the
41 Lake Clark Subsistence Resource Commission and
42 proponents supported the five-day extension at the
43 beginning of the season. Supporting this proposal
44 would make Federal regulations less restrictive and
45 provide for a subsistence priority under ANILCA Section
46 .804.

47

48 If this proposal is not adopted, the
49 Federal subsistence moose hunting season would be more

50

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1 restrictive than the State season, which would not
2 provide for a meaningful preference under ANILCA. With
3 no current conservation concern for moose in Unit 9B
4 the current more restrictive season is not warranted.

5

6 Thank you, Madame Chair.

7

8 MADAME CHAIR PITKA: Thank you very
9 much. Board discussion with Council Chairs and State
10 Liaisons.

11

12 (No comments)

13

14 MADAME CHAIR PITKA: Okay. So now is
15 the time to discuss and get clarification if you need
16 it.

17

18 MS. CREACHBAUM: I have a question.

19

20 MADAME CHAIR PITKA: Yes, please.

21

22 MS. CREACHBAUM: It's actually a
23 question of Staff. So it would be -- the Lake Clark
24 Subsistence Resource Commission was interested in the
25 five days after?

26

27 MS. PATTON: Yes. They circled back
28 around to reconfirm that they would like the extension
29 at the tail end as well and were supportive of it.

30

31 MS. CREACHBAUM: Okay. So Lake Clark
32 after, Bristol Bay before. Thank you. It's been a
33 day.

34

35 MADAME CHAIR PITKA: Did you want to
36 make that clarification into a microphone. Sorry about
37 that. Just for the record.

38

39 MS. PATTON: Thank you, Madame Chair
40 and Board Members. So for clarification the Lake Clark
41 Subsistence Resource Commission met in the fall and
42 reaffirmed their support for their own motion, which
43 was to extend the season by five days at the end, which
44 would align with the Board of Game passage of that
45 extension. They were consulted about the RAC's
46 recommendation.

47

48 The RAC met after the formal SRC
49 meeting and they had some discussions and thought,
50

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1 well, it would be okay to support it, but they did come
2 back around and say actually, through a poll vote,
3 that they would prefer to have -- because these
4 regulations are only affecting National Park Service
5 lands. All the other Federal lands can hunt under
6 State regulations.

7
8 However, the resident-zoned communities
9 that hunt within Lake Clark National Park would not be
10 able to hunt that extension at the tail end of the
11 season under State regs. So they preferred to have the
12 extension at the tail end for their own wishes and also
13 support of the extension of five days at the beginning
14 of the season as well.

15
16 Thank you, Madame Chair.

17
18 MADAME CHAIR PITKA: Thank you very
19 much for that clarification. I appreciate it. Further
20 questions.

21
22 (No comments)

23
24 MADAME CHAIR PITKA: Okay. So we are
25 at Board motion, discussion and action.

26
27 MS. CREACHBAUM: Madame Chair.
28 National Park Service. Madame Chair, I move adopt
29 Wildlife Proposal 24-12 with modification to extend the
30 fall moose season in Unit 9B by five days both at the
31 beginning and at the end of the current season for a
32 total extension of 10 days and take no action on
33 Proposals WP24-13 and WP24-14. If I get a second, I
34 will explain why I intend to vote in support of my
35 motion.

36
37 MR. BROWER: Second.

38
39 MS. CREACHBAUM: Thank you. The
40 Bristol Bay Subsistence Regional Advisory Council
41 suggested to modify the proposal by adding the five-day
42 season extension at the beginning of the hunting season
43 when access is easier due to water levels and the meat
44 is more palatable prior to the rut.

45
46 This modification was discussed with
47 the Lake Clark Subsistence Resource Commission, which
48 is a proponent of this proposal. While some members
49 were supportive of the five-day extension at the
50

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1 beginning of the season, the Lake Clark Subsistence
2 Resource Commission ultimately expressed concern with
3 the trend of earlier and warmer summers. It may be too
4 warm to hunt in the early August.

5

6 Overall, the majority of subsistence
7 Resource Commission members felt that adding days at
8 the end of the current season provides a better chance
9 for cooler temperatures that are more conducive to
10 hunting moose and safely preserving the meat.

11

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Supporting this proposal with
modifications to add five days to the beginning and at
the end of the current season would make Federal
regulations less restrictive and provide for a
subsistence priority under ANILCA Section .804.

The combined 10-day extension would
provide maximum flexibility for subsistence hunters to
hunt when weather conditions are more favorable and to
address the interests of both the Bristol Bay
Subsistence Advisory Council and the Lake Clark
Subsistence Resource Commission.

There is no current conservation
concern for moose in Unit 9B and the State regulations
have already been extended by five days at the end of
the hunting season. However, this does not apply to
National Park Service lands and, thus, resident-zoned
communities eligible to hunt in the Park would not
benefit from the season extension at the tail end
unless passed in Federal regulation.

Lake Clark National Park and Preserve
encompasses the majority of Federal lands in Unit 9B
and the Lake Clark wildlife biologist does not believe
adding five days to both the beginning and the end of
the hunting season would be of concern for the
conservation of the moose population, particularly
since the harvest limit of one bull moose remains the
same.

If passed, the modification regulation
for the fall hunt season should read Unit 9B moose, one
bull by State registration permit, August 27 to
September 25.

Thank you, Madame Chair.

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1 MADAME CHAIR PITKA: Thank you for
2 that. Any Board discussion? Any questions?

3
4 MR. BROWER: Question, Madame Chair.

5
6 MADAME CHAIR PITKA: Thank you so much.
7 Okay. So at this time I'd ask for a roll call vote.

8
9 MS. HOWARD: Certainly. Thank you,
10 Madame Chair.

11
12 So starting with the maker of the
13 motion National Park Service, Sarah Creachbaum.

14
15 MS. CREACHBAUM: National Park Service
16 supports.

17
18 MS. HOWARD: Thank you.

19
20 Bureau of Indian Affairs, Jolene John.

21
22 MS. JOHN: Bureau of Indian Affairs
23 supports the motion, which would include both the
24 Bristol Bay Council and the Lake Clark Council
25 recommendations. This would provide better
26 opportunities for subsistence users and it would also
27 help to ensure that the harvested meat is of good
28 quality. There will be no conservation concerns
29 associated with an earlier opening and longer season as
30 well.

31
32 We also acknowledge that the Council's
33 recommendation is supported by the tribal and local
34 residents' testimony that has been provided to the
35 Board and we appreciate receiving this input and local
36 knowledge on this proposal.

37
38 MS. HOWARD: Thank you.

39
40 Bureau of Land Management, Chris McKee.

41
42 MR. MCKEE: BLM votes to support
43 WP24-12 as modified by the National Park Service and to
44 take no action on WP24-13 and 24-14. The five-day
45 extension at the start of the season allows for
46 subsistence hunting opportunity at a time when moose
47 meat is more palatable prior to the rut.

48
49 Adding an additional five days at the
50

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1 end of the season will provide for hunting
2 opportunities when there's a better chance the
3 temperatures will be cooler, which is more conducive to
4 moose hunting and preserving harvested meat.

5

6 These modifications will provide for a
7 meaningful subsistence priority. It should also be
8 noted that there do not appear to be any conservation
9 concerns as the bull:cow ratio in the area is above
10 management objectives, indicating that there are
11 additional animals available for harvest.

12

13 Thank you, Madame Chair.

14

15 MADAME CHAIR PITKA: Thank you.

16

17 MS. HOWARD: Fish and Wildlife Service,
18 Sara Boario.

19

20 MS. BOARIO: Fish and Wildlife Service
21 supports. This supports multiple users in Bristol Bay
22 and Lake Clark communities for additional meaningful
23 preference for subsistence hunting opportunities.

24

25 Thank you, Madame Chair.

26

27 MADAME CHAIR PITKA: Thank you.

28

29 MS. HOWARD: U.S. Forest Service, Chad
30 VanOrmer.

31

32 MR. VANORMER: The Forest Service
33 supports WP24-12 with the RAC modification to open the
34 moose season in Units 9B five days before and five days
35 after, and take no action on WP24-13 and 14 in
36 deference to the Bristol Bay Subsistence Regional
37 Advisory Council and for the reasons stated by the
38 Council and National Park Service.

39

40 Thank you, Madame Chair.

41

42 MADAME CHAIR PITKA: Thank you.

43

44 MS. HOWARD: Public Member Charlie
45 Brower.

46

47 MR. BROWER: Support the motion and
48 recommendations by Bristol Bay Regional Advisory
49 Council.

50

0342

1 MADAME CHAIR PITKA: Thank you, Member
2 Brower. And you have Tony Christianson's proxy.

3
4 MR. BROWER: Support.

5
6 MS. HOWARD: One more time just to be
7 clear on the record, please.

8
9 MR. BROWER: Tony supports.

10
11 MADAME CHAIR PITKA: Thank you very
12 much.

13
14 MS. HOWARD: Thank you, Member Brower.
15 And Chair Pitka, your vote, please.

16
17 MADAME CHAIR PITKA: I support 24-15 as
18 modified by the National Park Service and take no
19 action on the other two proposals as already stated.
20 Thank you so much.

21
22 MS. HOWARD: Thank you, Madame Chair.
23 The motion passes unanimously.

24
25 MADAME CHAIR PITKA: Thank you very
26 much. So we are at 24-15 Unit 9C caribou. Kendra,
27 thank you.

28
29 MS. HOLMAN: Hello again, Madame Chair,
30 Members of the Council. This will be the summary of
31 analysis for Wildlife Proposal WP24-15. It can be
32 found starting on page 998 of your meeting book.

33
34 WP24-15 was submitted by the Igiugig
35 Village Tribal Council, proposes to establish a hunt
36 for resident caribou within Katmai National Preserve
37 in Unit 9C.

38
39 The proponent states that local
40 observations for over 30 years have indicated that a
41 herd of caribou, currently assumed by regulators to be
42 associated with the Mulchatna Caribou Herd do not
43 migrate out of the Kukaklek Lake area and surrounding
44 hills within Katmai National Preserve.

45
46 According to the proponents, this
47 caribou herd does not leave the area and residents have
48 observed caribou in the area for decades after a
49 reindeer herding program operated in the area. Even
50

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1 though the villages of Igiugig and Kokhanok have
2 harvested caribou for decades, this herd remains
3 stable.

4
5 Caribou hunting opportunities under
6 State and Federal regulations have been closed since
7 2019. Since then local observations of the resident
8 caribou herd indicate the population has grown.

9
10 Caribou in the northern portion of Unit
11 9C, including Katmai National Preserve, have
12 historically been managed as part of the Mulchatna
13 Caribou Herd, along with Units 9A, 9B, 17, 18, 19A and
14 19B.

15
16 Harvest of the Mulchatna Caribou Herd
17 has been closed since December of 2019 for the Federal
18 season and January of 2020 for the State season.
19 Historically, the Mulchatna Herd covered approximately
20 60,000 square acres (sic). According to local
21 residents, a wildlife biologist in the region,
22 sightings of the Mulchatna Caribou in Unit 9C though
23 have become scarce.

24
25 Katmai National Preserve has started
26 working with ADF&G placing radio collars on what we're
27 calling the Kokhanok caribou at this point in time just
28 to reference exactly a group that we're speaking of.
29 Based on the observations from the Katmai National Park
30 and Preserve, the Kokhanok caribou tend to stay close
31 to Kukaklek Bench and do not appear to migrate.

32
33 In 2021 and 2022, Katmai National
34 Preserve started conducting minimum counts of these
35 caribou in conjunction with ADF&G observing 306 in 2021
36 and 312 in 2022. There was an update on those numbers
37 for fall of 2024 at the Alaska Board of Game meeting in
38 Kotzebue and the numbers were over 400 this last fall.

39
40 Currently the caribou within Katmai
41 National Preserve in Unit 9C are managed as part of the
42 Mulchatna Caribou Herd; however, it is unknown how many
43 caribou have been harvested from this area as part of
44 that Mulchatna Caribou Herd versus the referenced
45 resident Kukaklek caribou.

46
47 Section .804 of ANILCA.....

48
49 (Phone interruption)

50

0344

1 MADAME CHAIR PITKA: Sorry, there's
2 somebody on the line right now who's providing a lot of
3 feedback. Can you please mute your lines.

4
5 MS. HOLMAN: In ANILCA Section .804
6 subsistence user prioritization was done with this
7 analysis. Based on the three criteria in ANILCA
8 Section .804, the communities of Igiugig and
9 Kokhanok would be the communities who are eligible to
10 hunt caribou in the proposed area if a Federal hunt
11 were to open. Under the entire ANILCA Section .804
12 determination can be found starting on Page 1007 in
13 your meeting book.

14
15 If this proposal is to be adopted with
16 modification, a caribou hunt would be established for
17 residents of Igiugig and Kokhanok within the Unit 9C
18 Katmai National Preserve. This will provide greater
19 subsistence opportunity to residents of Igiugig and
20 Kokhanok, especially given the drastic decline and
21 subsequent hunting closures for the Mulchatna Herd.
22 However, effects on the caribou population are unknown
23 as little biological and harvest information is
24 currently available.

25
26 As more information becomes available
27 about these Kukaklek caribou in Unit 9C a hunting
28 opportunity can be adjusted accordingly through
29 in-season management. Data collection regarding the
30 migratory movements of these caribou needs to continue
31 and be analyzed. In addition, strategies may need to
32 be developed to manage these caribou as a hunt separate
33 from Mulchatna.

34
35 The villages of Igiugig and Kokhanok
36 have the higher customary dependence on caribou in the
37 proposed hunt area, based on the three criteria in
38 ANILCA Section .804. Only these two communities will be
39 eligible to harvest caribou in the area.

40
41 The OSM conclusion is to support
42 Proposal WP24-15 with modification to clarify
43 regulatory language, establish a "may be announced"
44 season, delegate authority to the Katmai National Park
45 and Preserve superintendent to manage the hunt via
46 delegation of authority letter found in Appendix 1 of
47 the analysis. And reduce eligibility to harvest
48 caribou in the area to residents of Igiugig and
49 Kokhanok only.

50

0345

1 MADAME CHAIR PITKA: Thank you very
2 much. Does anybody have any questions of the analyst
3 at this time?

4
5 (No comments)

6
7 MADAME CHAIR PITKA: Seeing none. I'd
8 like the summary of written public comment, please.

9
10 MS. HOLMAN: One written comment was to
11 conditionally support this proposal from the Bristol
12 Bay Native Corporation including the condition that the
13 residents of Kokhanok were included when practicable.
14 That was based on the initial proposal, which only
15 included the village of Igiugig.

16
17 MADAME CHAIR PITKA: Thank you for
18 that. Summary of tribal and ANCSA corporation
19 consultation, please.

20
21 MR. LIND: Thank you, Madame Chair.
22 Orville Lind, Native Liaison for OSM. During the
23 consultation session we had an Igiugig resident state
24 that the Federal subsistence regulations should not be
25 more restrictive than the State regulations. He shared
26 that there's a lot of Federal lands in this area and it
27 may put people hunting illegally. This proposal is to
28 establish a hunt for the residence herd in Katmai
29 National Preserve.

30
31 He also shared that he is older now and
32 has been following an elder with a lot of history of
33 hunting and trapping in that area. This caribou herd
34 has remained in this area. He also shared that his
35 grandmother was a reindeer herder in that same area.

36
37 That's all I have, Madame Chair.

38
39 MADAME CHAIR PITKA: Thank you very
40 much for that. Tribal and Native organization and
41 ANCSA corporation testimony at this time.

42
43 MR. SALMON: Hi. Jonathan Salmon,
44 Igiugig Village Council here.

45
46 MADAME CHAIR PITKA: Yes, please, Mr.
47 Salmon.

48
49 MR. SALMON: I was trying to use the
50

0346

1 raise hand that time and it wasn't doing anything.

2

3 MADAME CHAIR PITKA: Sorry about that.
4 We had kind of technical difficulty, so we try to pause
5 for a minute and let everybody unmute or whatever the
6 issue. Thank you very much.

7

8 MR. SALMON: Okay. I just wanted to
9 clarify the minimum count in the fall of 2023 was 435,
10 which is an increase of 129 there over the course of
11 three years.

12

13 This proposal -- I helped Randy Alvarez
14 write this proposal. This wasn't out of -- it wasn't
15 an emotional response to losing the hunt on the
16 Mulchatna Herd. This comes from observations that
17 Randy has taken from 1980, just observing just over
18 around 200 caribou in the Katmai Bench area there and
19 the Kukaklek Bench area.

20

21 I myself grew up with the Mulchatna
22 Herd passing through Igiugig and the Mulchatna Herd in
23 its heyday was clear as day when they arrived. The
24 shear amount that would cross across the pond would
25 break through and make travel uncrossable in their
26 locations. It was a momentous event.

27

28 All the communities would come down and
29 the caribou would cross over to the south side of the
30 Kvichak River arriving out of the north and heading
31 down to Oly's Meadow there and Levelok and Nondalton,
32 Newhalen, Kokhanok would travel down and Levelok would
33 travel up as well as some folks from Naknek area. I,
34 myself, didn't hunt down there too much. There was a
35 lot of gunfire going off.

36

37 Anyways, continuing on into my trips
38 into Kukaklek. I started observing these caribou with
39 Randy and became more interested in them and I listened
40 to about 30 hours of Project Jukebox there that's
41 recorded with Doug Dewar and some Callaway Reports, and
42 just observing the traditional knowledge of
43 documentation of the separation of these caribou from
44 the Mulchatna Herd over the course of -- starting in
45 1960, I believe.

46

47 It's clear as day to us here on the
48 ground that caribou are traveling further east up there
49 behind Kokhanok and then they travel down towards the

50

0347

1 west in the winter here, but they never do leave the
2 bench up there. I just wanted to make that clear.
3 They never go from the south of us to the north side.

4
5 Kukaklek itself is very close. I go
6 back there several times a year and I go back and
7 recreational camp. I like to go back and take stock of
8 the animals that are there. Moving forward with this
9 request I'm really hoping that some day there's some
10 sort of co-management with Federal managers just
11 because we are already there on the ground so much and
12 we do have the ability to document what's there and
13 count numbers if need be. Just need the availability.

14
15 With that, thank you.

16
17 MADAME CHAIR PITKA: Thank you so much.
18 I appreciate your comment. Was there any additional
19 comments?

20
21 MR. DUNAWAY: Madame Chair.

22
23 MADAME CHAIR PITKA: Yes.

24
25 MR. DUNAWAY: I'm not sure if this is
26 my proper role or where do you insert it, but I just
27 got a message from a person who described himself as
28 the Traditional Chief from Kokhanok. Should I speak
29 now or add it to the RAC comments?

30
31 MADAME CHAIR PITKA: You can add it now
32 if it's not a RAC comment.

33
34 MR. DUNAWAY: Yeah, it's separate. He
35 said tell them the Traditional Chief of Kokhanok
36 Village supports this 100 percent and he is one of the
37 people I correspond with almost every day. Thank you.

38
39 MADAME CHAIR PITKA: Thank you very
40 much for that.

41
42 MS. SALMON: I'm sorry. My apologies.
43 Can you hear me?

44
45 MADAME CHAIR PITKA: Yes. Yes, I can
46 hear you. Are you public testimony for -- I'm sorry.
47 We're at tribal and Native organization testimony at
48 this time for.....

49
50

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1 MS. SALMON: Yes.

2

3 MADAME CHAIR PITKA: Okay, great. Go
4 ahead.

5

6 MS. SALMON: This is Christina Salmon.
7 I serve on Igiugig Village Council and Igiugig Native
8 Corporation. I just wanted to say -- you heard my
9 brother Jon just speak. You know, having this open for
10 our people would be wonderful, especially as a food
11 source for us. You know, we date back a long time to
12 our grandmother living and raising reindeer in that
13 area. Our board has asked me to come forward and just
14 ask for your approval here.

15

16 MADAME CHAIR PITKA: Thank you very
17 much, Christina. I appreciate your comments.

18

19 MS. SALMON: Thank you.

20

21 MADAME CHAIR PITKA: Were there
22 additional comments online?

23

24 (No comments)

25

26 MADAME CHAIR PITKA: Okay. So at this
27 time I would like to go to Advisory Group testimony,
28 State ACs, SRCs, working groups and et cetera.

29

30 MS. PATTON: Good afternoon, Madame
31 Chair, Members of the Board. For the record, Eva
32 Patton with the National Park Service Subsistence
33 Program. The Aniakchak SRC also discussed this
34 proposal and the SRC remains neutral on WP24-15.
35 Although the residents of Unit 9E have C&T for caribou
36 and Unit 9C, the SRC feels this proposal falls outside
37 of its regional purview.

38

39 Thank you, Madame Chair.

40

41 MADAME CHAIR PITKA: Thank you very
42 much for that. I appreciate it. Okay. At this time I
43 would like to open the floor for public testimony. We
44 have one card from Mr. Donald Mike.

45

46 MR. MIKE: Thank you, Madame Chair.
47 Members of the Council. My name is Donald Mike. I'm a
48 private individual testifying on behalf of --
49 commenting on WP24-15. I support as stated by the

50

0349

1 Bristol Bay recommendations to support this proposal.
2 I hope in the future that the State of Alaska and the
3 National Park Service will be able to come up with
4 funds to monitor this specific herd that are being
5 spoken of, the Kukaklek Caribou Herd and to monitor
6 this population.

7

8 As far as providing subsistence
9 opportunities, when this herd comes to a level that is
10 sustainable, I hope the rest of the communities
11 adjacent to this herd will submit proposals to request
12 for C&T and to be able to harvest the caribou.

13

14 I also support Mr. Jonathan Salmon's
15 comments. He's provided valuable information to this
16 Board and Council.

17

18 Thank you.

19

20 MADAME CHAIR PITKA: Thank you very
21 much, Mr. Mike. I appreciate your comments today. Are
22 there additional public comments online. That was the
23 last card that I had, so I wasn't sure.

24

25 (No comments)

26

27 MADAME CHAIR PITKA: If not, I'd like
28 to open the floor to the Regional Advisory Council
29 recommendation. Thank you very much.

30

31 MR. DUNAWAY: Thank you, Madam Chair.
32 Dan Dunaway, Vice Chair of Bristol Bay RAC. We
33 supported this with OSM modification.

34

35 The Council shared traditional
36 knowledge about the Kukaklek resident caribou herd,
37 demonstrating the herd has remained in this area since
38 the '40s when there were reindeer herders and does not
39 join the migration of Mulchatna Caribou Herd.

40

41 Traditional ecological knowledge
42 reported by the Council also demonstrated that local
43 animals in the resident herd are larger than the
44 Mulchatna Caribou further, signifying that this may be
45 a distinct herd from the Mulchatna Herd.

46

47 Harvest opportunities have been closed
48 to the Mulchatna Herd since 2019. Allowing the ability
49 to hunt resident herd would be an important resource

50

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1 for Igiugig and Kokhanok communities. The way the
2 proposal is written I want to emphasize Igiugig and
3 Kokhanok strengthening food security.

4
5 Council supported including Igiugig and
6 Kokhanok as eligible communities to this hunt as both
7 communities have traditionally harvested caribou in
8 this area. They're kind of off on that side of the
9 lake. Kind of remote from any other villages.

10
11 That concludes the RAC comments. Thank
12 you.

13
14 MADAME CHAIR PITKA: Thank you very
15 much for that. Alaska Department of Fish and Game
16 comment. State Liaison.

17
18 MR. MULLIGAN: Thank you, Madame Chair.
19 The Alaska Department of Fish and Game opposes the
20 proposal. The Department considers caribou in Units 9B
21 and 9C north of the Naknek River as part of the
22 Mulchatna Caribou Herd.

23
24 Currently, the Mulchatna Caribou Herd
25 has a significant conservation concern and no
26 harvestable surplus exists throughout its range. It is
27 unclear if this group is currently isolated from the
28 main segment of the Eastern Mulchatna Caribou Herd,
29 which is closed to hunting, but it is clear that these
30 caribou were not isolated during the peak of the
31 Mulchatna Herd.

32
33 Currently, the population trajectory is
34 unknown for the Iliamna Hills segment of the Mulchatna
35 Herd. Until additional information is collected and
36 presented that warrants opening this area ADF&G cannot
37 support a hunt for any caribou in this range.

38
39 The Mulchatna Caribou Herd reached its
40 peak in the 1990s at approximately 200,000 animals and
41 ranged well into Units 9A and 9C. It is believed that
42 during this peak a small herd such as the Kilbuck in
43 Unit 18 were absorbed at the time and no caribou are
44 currently showing site fidelity to its historic range.
45 There were no designated herds in the Iliamna Hills
46 prior to the expansion of the Mulchatna through Units
47 9A and B where tens of thousands of caribou roamed
48 during the 1990s.

49
50

1 proponents, this caribou herd does not leave the
2 Kukaklek Lake area, indicating that they have separated
3 themselves from the Mulchatna Caribou Herd. Residents
4 of Igiugig and Kokhanok have a long customary and
5 traditional use of caribou in the Katmai Preserve,
6 specifically the area around Kukaklek Lake, and have
7 harvested caribou in this area for decades.

8

9 Effects of this proposal on the
10 Kukaklek caribou population are unknown as little
11 biological and harvest information is currently
12 available. ADF&G stated at the recent Board of Game
13 meeting they consider these caribou to be part of the
14 Mulchatna herd and there is little data. Due to lack of
15 data, it is unknown if a hunt is sustainable at this
16 time.

17

18 Data collection regarding the migratory
19 movements of the caribou needs to continue and to be
20 analyzed. In addition, strategies would need to be
21 developed to manage the Kukaklek caribou hunt separate
22 from the Mulchatna Caribou Herd. As more information is
23 gathered, flexibility would be necessary to address
24 potential conservation concerns while providing for
25 subsistence hunting opportunity.

26

27 The Bristol Bay Regional Advisory
28 Council supports the OSM modification to establish a
29 "may be announced" season, and delegate authority to
30 the Katmai National Park and Preserve superintendent to
31 manage the hunt via Delegation of Authority letter. A
32 Delegation of Authority letter is put into place to
33 allow for the flexibility to announce a hunt, set
34 harvest limits and other restrictions when conditions
35 allow in order to provide for subsistence opportunity,
36 while ensuring the conservation of the population. As
37 more information becomes available about Kukaklek
38 caribou, hunting opportunity could be adjusted
39 accordingly through in-season management.

40

41 For Kukaklek caribou, delegating
42 authority to the land manager and reducing eligibility
43 to harvest caribou in the area to residents of Igiugig
44 and Kokhanok based on the three criteria in ANILCA .804
45 could potentially allow for a small harvest and provide
46 a meaningful subsistence opportunity for these
47 communities.

48

49 Thank you, Madame Chair.

50

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1 MADAME CHAIR PITKA: Thank you so much.
2 I appreciate that. Board discussion with Council
3 Chairs and State Liaisons. This is the time to ask
4 questions.

5
6 (No comments)

7
8 MADAME CHAIR PITKA: Okay. Seeing no
9 discussion, does anybody else have any discussion? If
10 not, we will go to the Board motion, discussion and the
11 action. Thank you.

12
13 MS. CREACHBAUM: Madame Chair.

14
15 MADAME CHAIR PITKA: Yes, please,
16 Member Creachbaum.

17
18 MS. CREACHBAUM: This is Sarah
19 Creachbaum, National Park Service. I move to adopt
20 Wildlife Proposal 24-15 to establish a hunt for
21 resident caribou within Katmai National Preserve with
22 the OSM modification. If I get a second, I will
23 explain why I intend to vote in support of my motion.

24
25 MR. BROWER: Second.

26
27 MS. CREACHBAUM: Thank you. In the
28 context of a drastic Mulchatna Caribou Herd population
29 decline, this proposal offers an opportunity for the
30 continuation of subsistence as well as more nuanced
31 caribou management.

32
33 Local and indigenous knowledge
34 indicates the long-standing presence of a resident
35 caribou population in Katmai National Preserve. This
36 population is understood to remain in or near the
37 Preserve year round and does not calve with the larger
38 Mulchatna Herd.

39
40 The resident caribou population in
41 Katmai National Preserve is also understood to have
42 remained stable despite the continued population
43 decline of the Mulchatna Herd since its peak in the
44 1990s.

45
46 However, this resident population is
47 quite small with just a few hundred animals. This
48 caribou population can therefore not sustain harvest by
49 all communities with customary and traditional use

50

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1 determinations for caribou in that portion of Unit 9C.

2

3

4 At this time it is necessary to
5 restrict the taking of caribou in Katmai National
6 Preserve according to the three criteria outlined in
7 ANILCA Section .804. OSM Section .804 analysis finds
8 that the villages of Kokhanok and Igiugig have the
9 highest customary dependance on caribou in the proposed
10 hunt area.

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Given the resident caribou population small size and conservation concerns surrounding caribou across Southwest Alaska, the National Park Service supports the delegation of authority to the Katmai Superintendent to manage this may-be-announced hunt providing the greatest amount of in-season management flexibility when it is determined the caribou population within the preserve can sustain limited harvest.

Thank you, Madame Chair.

MADAME CHAIR PITKA: Thank you very much for that. Are there any questions or further discussion?

MR. MCKEE: Question.

MADAME CHAIR PITKA: Thank you very much. Can we get a roll call vote, please.

MS. HOWARD: Certainly. Starting with the maker of the motion for Wildlife Proposal 24-15, the motion to adopt with OSM modification. National Park Service, Sarah Creachbaum.

MS. CREACHBAUM: Thank you. National Park Service votes to adopt the proposal for the reasons stated.

MS. HOWARD: Thank you. Bureau of Indian Affairs, Jolene John.

MS. JOHN: BIA votes to support the motion and adopt the Bristol Bay Council's modification for Wildlife Proposal 24-15. We concur with the justification provided by the National Park Service and we appreciate the important traditional plus local knowledge provided by tribes and rural residents during

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1 their testimony on this proposal.

2

3 Quyana. Thank you.

4

5 MS. HOWARD: Thank you. Bureau of Land
6 Management, Chris McKee.

7

8 MR. MCKEE: BLM votes to support
9 Proposal WP24-15 as modified by OSM. The OSM
10 modification provides greater subsistence opportunity
11 for residents of Igiugig and Kokhanok while also
12 maintaining a rural subsistence priority. Delegating
13 in-season management authority to the Katmai National
14 Park Superintendent provides management flexibility to
15 address any conservation concerns while maximizing
16 subsistence opportunity.

17

18 Providing for a may-be-announced season
19 will allow for hunting opportunities as more
20 information becomes available about the Kukaklek
21 Caribou Herd. The villages of Igiugig and Kokhanok
22 have the highest customary dependence on caribou in the
23 proposed hunt area as identified by the ANILCA Section
24 .804 user prioritization analysis. This is also
25 consistent with the recommendations of the Bristol Bay
26 Subsistence Regional Advisory Council.

27

28 Thank you, Madame Chair.

29

30 MADAME CHAIR PITKA: Thank you very
31 much for that.

32

33 MS. HOWARD: Fish and Wildlife Service,
34 Sara Boario.

35

36 MS. BOARIO: Fish and Wildlife Service
37 supports and concurs with the justification provided by
38 our colleagues at the National Park Service, which
39 furthers the opportunity for the continuation of
40 subsistence.

41

42 Thank you.

43

44 MS. HOWARD: Thank you.

45

46 U.S. Forest Service, Chad VanOrmer.

47

48 MR. VANORMER: Forest Service supports
49 Wildlife Proposal 24-15 with the OSM modification and
50

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1 in deference to the Bristol Bay Subsistence Regional
2 Advisory Council. This proposal is modified by OSM.
3 Provides for greater subsistence opportunity for rural
4 residents to the area.

5

6 Delegation of authority to the
7 in-season manager would allow for the flexibility to
8 announce a hunt and set harvest limits and other
9 restrictions when conditions allow in order to provide
10 for the greatest subsistence opportunity while still
11 ensuring conservation of the population.

12

13 Thank you, Madame Chair.

14

15 MADAME CHAIR PITKA: Thank you.

16

17 MS. HOWARD: Member Creachbaum has a
18 clarification.

19

20 MS. CREACHBAUM: I do have a
21 clarification on the advice of Counsel. That the
22 National Park Service votes to adopt Wildlife Proposal
23 24-15 with the OSM modification.

24

25 MADAME CHAIR PITKA: Thank you so much.

26

27 MS. HOWARD: Public Member Charlie
28 Brower.

29

30 MR. BROWER: Move to support with OSM
31 modification and recommendation from Bristol Bay
32 Subsistence Regional Advisory Council.

33

34 MS. HOWARD: And Member Brower you have
35 the proxy for Tony Christianson.

36

37 MR. BROWER: Support.

38

39 MS. HOWARD: Thank you. Chairwoman
40 Pitka, your vote, please.

41

42 MADAME CHAIR PITKA: I vote to support
43 WP24-15 as modified by OSM for the reasons stated
44 before me.

45

46 MS. HOWARD: Thank you, Madame Chair.
47 Motion to adopt with OSM modification passes
48 unanimously.

49

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1 MADAME CHAIR PITKA: Okay. So, sorry.
2 We have a couple of time sensitive matters. So if we
3 can go to WP24-25, Units 24A, 24B sheep, I would really
4 appreciate it. Thank you so much. Please proceed.

5
6 MR. UBELAKER: Thank you, Madame Chair.
7 I guess I didn't realize that after my last
8 presentation you were serious about wanting to hear
9 more from me.

10
11 (Laughter)

12
13 MR. UBELAKER: Thank you for
14 rearranging the schedule. If you could convince my
15 kids to listen this well, I'd appreciate it.

16
17 MADAME CHAIR PITKA: I got it.

18
19 MR. UBELAKER: For the record my name
20 is Brian Ubelaker, wildlife biologist with the Office
21 of Subsistence Management. I will give you a brief
22 presentation, summary of the analysis of Wildlife
23 Proposal WP24-25, which was submitted by the Western
24 Interior Regional Advisory Council. This analysis
25 begins on Page 1115 of your meeting books.

26
27 Proposal WP24-25 requests to reduce the
28 sheep harvest limit in Units 24A and 24B within Gates
29 of the Arctic National Park from three sheep, no more
30 than one of which may be a ewe, to one ram. This
31 reduction would exclude residents of Anaktuvuk Pass who
32 harvest sheep under a different system than this.

33
34 This reduction is requested to address
35 the declining sheep population in Unit 24 as recent
36 steep declines have the Council concerned and feel the
37 remaining population needs to be protected from
38 overharvest and allowed to recover. While realizing
39 that allowing ewe harvest would severely restrict the
40 reproductive potential of the herd.

41
42 The proponent does recognizes this
43 reduction would be a major restriction to Federally-
44 qualified subsistence users, but they feel that
45 allowing the harvest of one ram will still allow for
46 some opportunity.

47
48 This hunt was originally established in
49 1997 and remained largely unchanged until 2006. At
50

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1 that point the harvest limit has changed incrementally
2 to the harvest of full curl management restrictions
3 that we see today.

4
5 State regulations closely resembled
6 Federal regulations up until 2017 when the Board of
7 Game did restrict ewe harvest to the same limits of not
8 more than one sheep, maybe a ewe.

9
10 The Federal Subsistence Board in 2022,
11 by adopting WSA22-02, closed all Federal lands. Poor
12 population metrics caused by severe winter weather were
13 justification for closing Federal lands to sheep
14 hunting.

15
16 As far as population of sheep in this
17 area, the National Park Service surveys two areas
18 within Gates of the Arctic. The Southeast Gates of the
19 Arctic area and the Anaktuvuk survey area.

20
21 In the most recent survey of 2022,
22 Southeast Gates of the Arctic area showed a decline of
23 63 percent from the high estimate in 2015.

24
25 The Anaktuvuk survey area, which had
26 its highest estimate in 2015, declined in the following
27 survey of 2016, then has been steadily increasing to
28 the 2021 survey.

29
30 Full curl ram abundance has followed
31 the same trend as the overall population. Southeast
32 Gates of the Arctic survey area showed an 80 percent
33 decline in full curl rams over the 2015 estimate, while
34 the Anaktuvuk survey area showed a 44 percent decline
35 over the 2015 estimate.

36
37 As far as harvest of sheep in this
38 area, it only appears under Federal permit, which was
39 established in 2016. This permit has been issued a
40 total of 55 times since its inception with no harvest
41 reported.

42
43 State harvest occurs outside of this
44 area, outside of Gates of the Arctic, with a harvest
45 ticket. There's a small amount of State land and their
46 harvest limit is up to three sheep, one of which may be
47 a ewe.

48
49 If this proposal is adopted, there
50

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1 would be a noticed reduction in Federal opportunity,
2 but there would still be opportunity for Federally-
3 qualified subsistence users to harvest one ram. With
4 no reported harvest it would equate to little lost
5 opportunity for Federally-qualified subsistence users.
6 The elimination of ewe harvest may increase the
7 productivity and aid in overall population recovery.

8
9 Therefore, it is OSM's conclusion to
10 support Proposal WP24-25 as a reduction in harvest is
11 warranted due to the population decline. Restricting
12 ewe harvest will allow the most important variable in
13 breeding to remain in the population with a negligible
14 impact to Federally-qualified subsistence users who
15 will still be able to harvest one ram.

16
17 With that I would be happy to answer
18 any questions anyone may have.

19
20 MADAME CHAIR PITKA: Thank you. Does
21 anybody have any questions on the analysis.

22
23 (No comments)

24
25 MADAME CHAIR PITKA: Okay. Can I get
26 summary of written public comment, please.

27
28 MR. UBELAKER: Madame Chair, there were
29 no written public comments submitted for this.

30
31 MADAME CHAIR PITKA: Shocking. Okay.
32 At this time can I get the summary of tribal and ANCSA
33 corporation consultations.

34
35 MR. LIND: Thank you, Madame Chair.
36 Orville Lind, Native Liaison for OSM. For WP24-25 we
37 did not have any questions or comments. Thank you,
38 Madame Chair.

39
40 MADAME CHAIR PITKA: Thank you very
41 much, Mr. Orville Lind. Is there any tribal or Native
42 organization or ANCSA corporation testimony at this
43 time?

44
45 (No comments)

46
47 MADAME CHAIR PITKA: Online? No.
48 Advisory group testimony; State ACs, SRCs, working
49 groups and et cetera. Thank you, Ms. Eva Patton.

50

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1 MR. PATTON: Madame Chair, Members of
2 the Board. Eva Patton with the National Park Service
3 Subsistence Program. The Gates of the Arctic
4 Subsistence Resource Commission did take up that
5 Proposal WP24-25 and voted unanimously to support this
6 proposal.

7
8 In discussion it was shared that at
9 this point the sheep population there aren't any ewes
10 to give and Unit 24A is closed under the current
11 Federal closure. It's going to take some time for the
12 sheep population to come back and subsistence hunters
13 in the Park should not be burdened with the horn curl
14 size. So this proposal is just for one ram and does
15 not include a horn size.

16
17 Thank you, Madame Chair.

18
19 MADAME CHAIR PITKA: Okay. I'd like to
20 open the floor for public testimony at this time. I
21 haven't gotten any cards and I don't see any hands up
22 in the room. No one online. Regional Advisory Council
23 recommendation, Chair designee.

24
25 MR. REAKOFF: Thank you, Madame Chair.
26 Western Interior Regional Advisory Council made the
27 proposal. We still feel strongly that the sheep
28 population cannot support any additional harvest.

29
30 I'm the vice-chair of the Gates of the
31 Arctic Subsistence Resource Commission. We have
32 additional data from 2023 and the Park Service did
33 distance sample. The population continued to decline
34 slightly, but the lamb:ewe-like ratios increased. So
35 they had 35 lambs per 100 ewe-likes in the last survey
36 even though the population is starting to -- still
37 retracting.

38
39 Some of the sheep are timing out and we
40 have predation. We've not had a lot of recruitment
41 over the last few years. We're missing several
42 cohorts. So the Gates of the Arctic Subsistence
43 Resource Commission and the Western Interior Regional
44 Advisory Council feel ewe groups are typically right
45 now -- the largest ewe groups I see are between three
46 to seven.

47
48 If one ewe is taken out of one of
49 those ewe groups -- and they don't go anywhere. They
50

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1 have relatively small home ranges. They cannot support
2 losing any of the ewes from any of the little
3 subgroups. They have micro habitats. They should be
4 managed strictly on Game Management Unit subunits
5 because they have such small areas. You can't manage
6 them on the Brooks Range wide population. That's not
7 the way this works.

8
9 So we're still very concerned that we
10 have had very few ewe groups producing lambs this last
11 spring. I went out and I found 14 adult ewes. I only
12 found two lambs. Two out of 14. That's really poor
13 recruitment. That comes out to what was found in the
14 State survey, which was nine lambs per 100 ewes. To
15 the east, the corridor -- this was in the corridor and
16 the ewe groups in the corridor only produced two lambs
17 out of 14 ewes.

18
19 I want the Board to understand that
20 this population is still teetering. We need to get it
21 to turn around and start building. I feel that 35
22 lambs could start up, but we've got a long ways to go.
23 We're talking about numbers that are basically only
24 between 70 to 80 percent down from what they were.

25
26 In 2015 they flew a survey in the Park.
27 The population is down by survey, down 76 percent, is
28 what the population is in the Gates of the Arctic
29 southeast portion, which is what this proposal is for.
30 Is still down -- it's only 24 percent of what it used
31 to be. We need to get this population to turn around.

32
33 Thank you, Madame Chair.

34
35 MADAME CHAIR PITKA: Thank you very
36 much for that. I appreciate it.

37
38 Alaska Department of Fish and Game.

39
40 MR. MULLIGAN: Thank you, Madame Chair.
41 The Alaska Department of Fish and Game opposes the
42 adoption of this proposal. The Department can see no
43 reason to reduce sheep hunting opportunities for
44 Federally-qualified users in this particular area. The
45 closure would have no potential biological benefit on
46 the sheep population in the eastern Brooks Range.

47
48 The proponent submitted this proposal
49 to address declining sheep populations in Unit 24.
50

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1 Recent sheep declines were likely caused by
2 weather-related events and not by human harvest. Dall
3 sheep in this area are managed using the conservative
4 full curl management under State regs except for
5 Federally-qualified users who can harvest any sheep.
6 Current regulations allow for the harvest of no more
7 than one ewe for Federally-qualified users within the
8 GAAR.

9
10 Ewe harvest is indistinguishable from
11 ram harvest and provided Federal harvest data, but
12 historically the Department knows ewe harvest to be
13 very low. The low harvest of ewes and the relatively
14 low harvest by subsistence users on the geographic
15 scale make it unlikely that Federal subsistence harvest
16 could negatively impact the sheep population on that
17 scale.

18
19 The additive average harvest from the
20 three Federal subsistence hunting opportunities
21 referenced was approximately 20 sheep per year. A
22 harvest of 20 sheep per year could affect localized
23 population dynamics, but is not significant when
24 considering the effect on the eastern Brooks Range
25 sheep population as a whole.

26
27 Thank you, Madame Chair.

28
29 MADAME CHAIR PITKA: Thank you very
30 much for that. I appreciate it.

31
32 InterAgency Staff Committee comments,
33 please.

34
35 MS. LAVINE: Thank you, Madame Chair.
36 Members of the Board. The InterAgency Staff Committee
37 provided the standard comments. Thanks.

38
39 MADAME CHAIR PITKA: Thank you. Board
40 discussion with Council Chairs and the State Liaison.
41 So now is the time to ask your questions and have
42 discussion. Okay.

43
44 MR. REAKOFF: One additional comment,
45 Madame Chair. We had a dramatic decline in Dall sheep
46 population in 2012-13, deep snow, rain on snow and a
47 one-month like breakup. We lost 70 percent of the
48 sheep at that time.

49
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1 We voluntarily -- the reason you're not
2 reflecting any ewe harvest is because we voluntarily
3 have protected ewes since then. But during the Board
4 deliberation -- the State Board of Game was informed by
5 the sheep biologist that there was still ewe harvest
6 and seemed to be highly annoyed that there was -- there
7 was ewe harvest in the Park. Well, this is addressing
8 that issue by regulation.

9
10 So we feel that this proposal is valid.
11 The State comments to the Board of Game were in
12 opposition -- was in support of this proposal.
13 Basically wanting to eliminate ewe harvest. We're
14 doing that with this proposal and we want to move
15 forward with conservation and regulation.

16
17 Thank you, Madame Chair.

18
19 MADAME CHAIR PITKA: Thank you for that
20 comment. I appreciate it. Are there any questions or
21 -- yes.

22
23 MS. ROGERS: Thank you, Madame Chair.
24 Alissa Nadine Rogers, YKDelta RAC for the record. I
25 have actually a two-part question. The first part of
26 this question is the biological concern. Even though
27 the number -- it may not be a harvest, but the numbers
28 and the data are showing there's a decline. Regardless
29 of who did what, shouldn't we take action to continue
30 to protect our resources?

31
32 The second part is I'm looking at the
33 regs between the State and our regs and the State regs
34 says one ram. Isn't this the same, pretty much
35 housekeeping so that you don't have two separate
36 regulations to confuse the use groups?

37
38 Thank you, ma'am.

39
40 MADAME CHAIR PITKA: Thank you for the
41 question. Brian.

42
43 MR. UBELAKER: In response to the
44 harvest limit, one ram is -- we're looking at Units 24A
45 and B within Gates of the Arctic National Park, which
46 has a harvest limit of three sheep, no more than one of
47 which may be a ewe. So we're trying to reduce it from
48 up to three sheep to one ram only to eliminate the ewe
49 harvest.

50

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1 MADAME CHAIR PITKA: Yes.

2

3

4 MS. ROGERS: I understand. Through the
5 Chair, Madame Chair. I just want to know -- my
6 question is -- I understand that's what the point is,
7 but the State is in opposition of this when their own
8 regulation says one ram. Maybe it's for you guys.

8

9 MR. MULLIGAN: Through the Chair,
10 Member Rogers.

11

12 MADAME CHAIR PITKA: Okay. Yes.

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22 MADAME CHAIR PITKA: Thank you for the
23 clarification. Lisa.

25 MS. GREDIAGIN: Lisa Grediagin for the
26 record. Just to clarify, the Federal proposal is only
27 for Gates of the Arctic National Park. So no one can
28 hunt in the National Park under State regulations.

30 MADAME CHAIR PITKA: Thank you for that
31 clarification. I appreciate it. Yes.

33 MR. REAKOFF: I've got the survey data.
34 In 2015 the Gates of the Arctic Park Service flew
35 distance sample. They found 2,525 sheep. The
36 regulatory change down to one ewe under State
37 regulations was adopted in 2017 just before we had
38 another dramatic decline. So in 2021 they flew a
39 survey. Drops from 2,525 to 1,100. Then in 2022 it's
40 923. 2023 is 608. The population is still in descend.
41 In reality, the State should have had a proposal to
42 eliminate ewe harvest in this last regulatory round.

44 Thank you, Madame Chair.

46 MADAME CHAIR PITKA: Thank you for that
47 discussion. Okay. I don't see any more Board members
48 wanting more discussion. Can we have a Board motion,
49 discussion and action at this time.

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1 MS. CREACHBAUM: Madame Chair.

2

3 MADAME CHAIR PITKA: Yes, please.

4

5 MS. CREACHBAUM: I move to adopt
6 Wildlife Proposal 24-25 as written. If I get a second,
7 I will explain why I intend to vote in support of my
8 motion.

9

10 MR. BROWER: Second.

11

12 MS. CREACHBAUM: Thank you, Charlie.
13 The proponent submitted this proposal to address the
14 declining sheep population in Unit 24. Recent steep
15 declines in sheep abundance are very concerning to the
16 subsistence communities that rely on sheep and warrants
17 protecting the remaining population from overharvest so
18 that the population has a chance to recover.
19 Prohibiting ewe harvest will support growth of the
20 population.

21

22 We recognize that this reduction will
23 be a restriction to Federally-qualified subsistence
24 users. However, allowing the harvest of one ram will
25 still allow for some harvest while aiding the recovery
26 of this declining sheep population.

27

28 Federally-qualified subsistence users
29 within Gates of the Arctic National Park and Preserve
30 will still have opportunity to harvest sheep within
31 that portion of Unit 24, providing for the continuation
32 of the Anaktuvuk Pass community sheep harvest.

33

34 Thank you, Madame Chair.

35

36 MADAME CHAIR PITKA: Thank you very
37 much for that. Are there any questions or any more
38 discussion on the motion itself?

39

40 (No comments)

41

42 MR. MCKEE: Question.

43

44 MADAME CHAIR PITKA: Thank you very
45 much BLM. At this time I'd like a roll call vote,
46 please.

47

48 MS. HOWARD: Thank you, Madame Chair.
49 For Wildlife Proposal 24-25 the motion is to adopt as
50

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1 written.

2

3 I'll start with the maker of the
4 motion, National Park Service, Sarah Creachbaum.

5

6 MS. CREACHBAUM: National Park Service
7 supports the adoption of Wildlife Proposal WP24-25 as
8 written.

9

10 MS. HOWARD: Bureau of Indian Affairs,
11 Jolene John.

12

13 MS. JOHN: BIA supports the motion and
14 the recommendation of the Western Interior Council on
15 Wildlife Proposal 24-25 and concur with the
16 justification provided by my colleague at the National
17 Park Service. We feel that these regulatory changes
18 will be important for the recovery of this Dall sheep
19 population and appreciate the expert knowledge provided
20 by Chairman Reakoff on this proposal.

21

22 MADAME CHAIR PITKA: Thank you, BIA.

23

24 MS. HOWARD: Bureau of Land Management,
25 Chris McKee.

26

27 MR. MCKEE: BLM votes to support
28 Proposal WP24-25. The harvest reduction for sheep in
29 Units 24A and 24B within Gates of the Arctic National
30 Park is warranted. Eliminating the harvest of ewes
31 will help protect the reproductive capacity of the
32 population and aid in its recovery in an area where
33 sheep numbers are continuing to decline.

34

35 Very few registration permits have been
36 issued and no harvest has been reported. Therefore,
37 impacts to Federally-qualified subsistence users should
38 be minimal and the ability to harvest a ram will be
39 retained. This is also consistent with the
40 recommendation of the Western Interior Alaska
41 Subsistence Regional Advisory Council.

42

43 Thank you, Madame Chair.

44

45 MADAME CHAIR PITKA: Thank you, BLM.

46

47 MS. HOWARD: Fish and Wildlife Service,
48 Sarah Boario.

49

50

0367

1 MS. BOARIO: Fish and Wildlife Service
2 supports as this proposal addresses the declining sheep
3 population. The recent steep declines and sheep
4 abundance are concerning to the subsistence communities
5 that rely on them and warrants protecting the remaining
6 population from overharvest so that the population has
7 a chance to recover. Harvesting one ram allows for
8 some harvest and balances it with conservation needs.

9
10 Thank you.

11
12 MADAME CHAIR PITKA: Thank you, Fish
13 and Wildlife Service.

14
15 MS. HOWARD: U.S. Forest Service, Chad
16 VanOrmer.

17
18 MR. VANORMER: The Forest Service
19 supports WP24-25 in deference to the Western Interior
20 Regional Advisory Council and for the reasons
21 identified by the National Park Service.

22
23 Thank you.

24
25 MS. HOWARD: Public Member Charlie
26 Brower.

27
28 MR. BROWER: Move to support WP24-25 as
29 written by the Council.

30
31 MS. HOWARD: Thank you. And Member
32 Brower for Tony Christianson's proxy.

33
34 MR. BROWER: Support.

35
36 MS. HOWARD: Thank you. Chairwoman
37 Pitka, your vote, please.

38
39 MADAME CHAIR PITKA: I support WP24-25
40 in deference to the Regional Advisory Council and
41 because the additional protections are warranted at
42 this time.

43
44 Thank you.

45
46 MS. HOWARD: Thank you, Madame Chair.
47 Motion passes unanimously.

48
49 MADAME CHAIR PITKA: Thank you very
50

0368

1 much. Now we are on WP24-26, Unit 24A, 26B sheep.

2

3

4 MR. UBELAKER: Thank you, Madame Chair.
5 For the record, Brian Ubelaker, OSM. I will not
6 present to you a brief summary for the analysis of
7 Wildlife Proposal WP24-26, which was also submitted by
8 the Western Interior Regional Advisory Council. You
9 can find this analysis beginning on Page 1136 of your
10 meeting books.

10

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Madame Chair, your microphone is on.

(Laughter)

MADAME CHAIR PITKA: Thank you for
that. I appreciate it.

MR. UBELAKER: You're welcome. The
proponent is requesting that Dall sheep hunting in Unit
24A and Unit 26B, west of the Sagavanirktok River, be
closed to all users to the harvest of sheep for the
2024-2026 wildlife regulatory cycle. This would be a
continuation of the closure which was initiated by
Wildlife Special Action 22-02.

The Council feels the sheep population
is still experiencing reduced numbers from winter
hardships and a few mature, breeding age rams remain in
the population. By continuing this closure keeping the
rams in the population will contribute to the overall
breeding population. The lower number of rams that
have been estimated and counted cannot support any
harvest.

Sheep hunting in this area has been on
the books since the early '90s. Since that time it has
seen numerous changes to season length and harvest
limits. They have been getting more restrictive since
about 2014 to the full curl management that we see in
effect today.

In 2020 the Board of Game extended the
sheep season within the Dalton Highway Corridor
Management area by 15 days. Then in 2022 the Federal
Subsistence Board took action to close this hunt via
Wildlife Special Action 22-02 justifying closing this
hunt, considering traditional ecological knowledge and
biological data.

0369

1 As a side note, the neighboring Units
2 23 and 26A sheep hunts were closed by the State in 2015
3 due to drastic declines in population.

4
5 I won't do a deep dive into the methods
6 of survey and what goes into them and behind them, but
7 I will briefly state that there are two different
8 survey methods. Alaska Department of Fish and Game
9 utilizes a minimum count survey. The National Park
10 Service and BLM use distance sampling, which provides
11 an estimate. The results of these two surveys are not
12 comparable apples to apples, but they do give us an
13 idea of trend in population.

14
15 The Fish and Game minimum count surveys
16 remained stable from 2002 to 2012. Then, due to severe
17 winter weather in 2013, the population declined. It
18 has been variable since then, but has remained low.

19
20 The 2022 survey showed a slight
21 increase over the 2021 survey. On the Federal side,
22 the BLM survey areas followed the same trend as Fish
23 and Game, but their 2023 results showed a continued
24 decline.

25
26 The Park Service estimates two
27 different areas; the Southeast Gates of the Arctic,
28 which was mentioned in the previous proposal, and the
29 Itkillik Survey Area. Both of these areas have showed
30 a continual decline since 2015.

31
32 There has been no reported harvest in
33 this area since 2021. Before that Federal reported
34 harvest averaged one sheep per year. The State
35 reported harvest during 2002-2021 averaged 52 hunters
36 in Unit 24A, taking an average 17 sheep per year. In
37 26B, they averaged 66 hunters per year, harvesting 18
38 sheep. Of these 17 and 18 sheep, non-resident harvest
39 out of that average 43 percent.

40
41 Alternatives considered in this
42 proposal were to close this hunt to only non-Federally-
43 qualified users as there's only five percent harvest
44 attributed to the Federal side from 2000 to 2021. With
45 a very low impact on Federal harvest on this population
46 it was considered -- it was an alternative that was
47 considered but not followed because the proponent
48 specifically requested to close it to all users.

49
50

0370

1 If this proposal is adopted, all
2 Federal lands in Units 24A and 26B west of the Sag
3 River will remain closed to the harvest of sheep by all
4 users for the 2024/25 seasons. This will represent a
5 decreased opportunity for all users. State regulations
6 still apply to private and State lands within Units 24A
7 and 26B, allowing for some harvest of sheep in the
8 area.

9
10 Extending the closure may increase
11 survival of full-curl rams, which could have cascading,
12 positive effects on the overall sheep population by
13 increasing ewe fecundity and lamb production.

14
15 Therefore it is OSM's conclusion to
16 support Proposal WP24-26 as a reduction in harvest is
17 warranted due to dramatically decreased abundance. The
18 closure to sheep hunting along the highly-accessible
19 Dalton Highway Corridor Management area should occur by
20 all users, which after constant hunting pressures and
21 severe winter weather the population has dropped
22 considerably.

23
24 Harvest rates appeared unsustainable
25 as legal ram numbers had decreased considerably, while
26 hunter effort and harvest had not. There appears to be
27 no harvestable surplus of mature rams in this
28 population as a few legal rams left are needed for
29 effective breeding to maximize land production, which
30 may help the Dall sheep recover and build a more
31 complete age structure.

32
33 With that I'd be happy to answer any
34 questions anybody may have.

35
36 MADAME CHAIR PITKA: Thank you. Does
37 anybody have any questions of the analyst at this time.

38
39 (No comments)

40
41 MADAME CHAIR PITKA: Okay. Thank you
42 for that analysis. Can I get a summary of written
43 public comments, please.

44
45 MR. UBELAKER: You may. There were no
46 written public comments submitted.

47
48 MADAME CHAIR PITKA: Okay. Can I get
49 the summary of the ANCSA and Tribal Consultation.

50

0371

1 MR. LIND: Thank you, Madame Chair.
2 During the consultation November 14th we did not have
3 any questions or comments. Thank you, Madame Chair.

4
5 MADAME CHAIR PITKA: Thank you very
6 much for that. At this time Tribal, Native
7 organization, ANCSA Corporation testimony.

8
9 (No comments)

10
11 MADAME CHAIR PITKA: I don't have any
12 cards.

13
14 MS. HOWARD: No one is online.

15
16 MADAME CHAIR PITKA: Okay. So advisory
17 group testimony, State ACs, SRCs, working groups and et
18 cetera.

19
20 MS. PATTON: Madame Chair. Members of
21 the Board. Eva Patton with the National Park Service
22 Subsistence Program and the Gates of the Arctic
23 Subsistence Resource Commission did discuss WP24-26 and
24 voted unanimously to support this proposal.

25
26 In discussion it was shared that this
27 proposal requests the continuation of the current
28 closure because the population is not increasing. The
29 proposal is necessary to conserve the sheep population
30 associated with the Dalton Highway Corridor area.

31
32 Thank you, Madame Chair.

33
34 MADAME CHAIR PITKA: Thank you very
35 much for that. I appreciate it. Okay. I'd like to
36 open the floor to public testimony at the time. I
37 don't have any cards, so is there anybody online?

38
39 (No comments)

40
41 MS. LAVINE: Madame Chair. No one has
42 raised their hand or expressed a desire to provide
43 testimony online. Thank you.

44
45 MADAME CHAIR PITKA: Thank you very
46 much. Okay. Regional Advisory Council recommendation.

47
48 MR. REAKOFF: Thank you, Madame Chair.
49 This is the Council's proposal. After two years of
50

1 closure we basically started with three-quarter curl in
2 the Dalton Highway Corridor and outside of the closure
3 area there's -- it's extensive hunting pressure exerted
4 against the populations to the east.

5
6 The Western Interior Regional Advisory
7 Council submitted proposals to the Board of Game under
8 agenda change request to eliminate counting rings on
9 sheep and hunters continuously misidentify rings on
10 horn. So basically once sheep pass through
11 three-quarter curl the composition data that was done
12 in the Atigun Gorge by the U.S. Fish and Wildlife from
13 1986-2012 it showed recruiting rams begin disappearing
14 past three-quarter curl. It's a sort of chronic
15 problem.

16
17 We submitted a proposal to agenda
18 change request. It failed. We also submitted a
19 regional proposal to eliminate counting of rings and
20 the State Board of Game indicated they may entertain a
21 statewide proposal on that. At this time we don't have
22 any kind of constraint on the numbers of hunters that
23 -- or would be eligible to hunt in this closed area.

24
25 We just lost Nelchina Caribou Herd.
26 The Forty-Mile Herd is way down. In 2001 and 2002 they
27 did a check station at the Yukon River Bridge. They
28 counted around 2,000 hunters only on weekends. We can
29 anticipate three to four thousand more hunters this
30 fall. Because where are all these caribou hunters
31 going to go anyway. They're going to go up the Haul
32 Road.

33
34 The Board of Game just increased the
35 bag limit to two caribou for non-resident bulls and
36 five from one to two for non-residents and four bulls
37 for residents to five caribou including cows with
38 calves. So there's going to be a fire sale going on on
39 caribou.

40
41 So all these hunters come to hunt and
42 if they're eligible with no constraint, no regulatory,
43 not full-curl management -- it says full-curl
44 management, but it's not. It's full-curl, both horns
45 broken or eight years of age. That's the issue.

46
47 There's so many hunters now going to be
48 attracted to this area. There's no way that the
49 population would be able to support any additional
50

0373

1 harvest of rams. The main makeup of the sheep
2 population right now is six and seven-year-old sheep.
3 That's the main makeup. In the Park there are some
4 older sheep that survived, but from the corridor to the
5 east the hunt continued too long. They took out all
6 the older rams. We have no older rams at all.

7
8 When they did collaring to the east --
9 they got a project going on -- they could only find one
10 eight-year-old ram in June of 2023. They wanted a
11 large ram to put a collar on.

12
13 So these younger rams are rejected by
14 ewes and I have to liken it to humans. It's like
15 14-year-old junior high school boys chasing 35-year-old
16 women. They're not going to get married. In Atigun
17 Pass there were six adult ewes. They had two half-curl
18 rams chase them all winter. They only produced two
19 lambs. Only two and they were really small. Those
20 died. Those were there in September. I've got pictures
21 in my phone of them. Those are gone now.

22
23 We had deep snow in Atigun Pass and
24 even in October and November those lightweight -- they
25 were born a month late is what happened. They were
26 born too late and so they died this winter. So the
27 recruitments continually fall off because there's no
28 large ram component. The ewes are waiting for large
29 rams to arrive. That's what's happening.

30
31 The people of our area are still on
32 personal restraint and want to continue this regulatory
33 closure for at least two more years. In two more years
34 we may see a response of the population and we may be
35 approaching the Board to do something
36 differently, but we have to see what happens. We're
37 not out of the woods.

38
39 This closure is very important to the
40 recovery of the Dall sheep population in the Dalton
41 Highway Corridor Federal land area at this time.

42
43 Thank you, Madame Chair.

44
45 MADAME CHAIR PITKA: Thank you very
46 much for that.

47
48 I'd like to ask for the North Slope
49 Subsistence Regional Advisory Council recommendation
50

0374

1 also.

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MR. FRANZ: Madame Chair. Brower Franz with the North Slope Regional Advisory Council. The North Slope Regional Advisory Council voted to support WP24-26. The North Slope Council supported this closure to help recover the sheep population, noting it would not drastically affect any communities on the North Slope Region. This area doesn't have any communities inside of it, so it will not affect any of our residents. The only thing you have in there is Prudhoe Bay.

Thank you.

MADAME CHAIR PITKA: Thank you very much for that comment.

Alaska Department of Fish and Game.

MR. MULLIGAN: Thank you, Madame Chair. The Alaska Department of Fish and Game opposes the adoption of this proposal. Dall sheep in this area are managed using the full-curl rams harvest management strategy. This strategy is considered conservative because it focuses harvest pressure on older-aged animals, males only in a small segment of the population.

Dall sheep rams on average become full curl at eight years of age or older and previous research has shown that these older rams have naturally higher mortality rates than younger-aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there's a higher likelihood the older ram would have died of natural causes anyways.

Furthermore, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the total population and this imposes a self-limit on overharvest of the population.

Taking collectively full-curl harvest strategy limits, harvest to only older-aged rams and a

0375

1 conservative self-limiting strategy that allows for
2 hunter opportunity while simultaneously preventing
3 overharvest and has minimum impacts on population
4 growth.

5
6 Additionally, we can demonstrate that
7 harvest fluctuates proportional to the number of
8 full-curl rams in the population with the full-curl
9 strategy and harvest of each cohort is proportional to
10 the recruitment of each respective cohort. Therefore,
11 we have confidence that the harvest is depending on the
12 cohort abundance.

13
14 Harvest data from the Brooks Range from
15 1987 to 2021 demonstrates that on average 35 percent of
16 legal rams are harvested the first year they are legal,
17 full-curl or eight years of age, whereas 65 percent of
18 rams are harvested greater than nine years of age.

19
20 Thus, this gives us another note to be
21 confident that all legal rams are not immediately
22 harvested annually and that social structures tend to
23 remain similar across the range of abundance with
24 full-curl management strategy, corroborating
25 compensatory harvest.

26
27 Thank you, Madame Chair.

28
29 MADAME CHAIR PITKA: Thank you very
30 much for your comment.

31
32 InterAgency Staff Committee comments,
33 please.

34
35 MS. LAVINE: Thank you, Madame Chair.
36 Members of the Board. There are serious concerns about
37 the viability of the Dall s sheep population along the
38 Dalton Highway Corridor Management Area or DHCMA.
39 Recent population estimates and minimal count surveys
40 indicate substantial declines in legal rams, ewes, and
41 lambs in most survey areas along the DHCMA.

42
43 Severe weather conditions, including
44 extended winters and rain on snow events are thought to
45 be a major factor in the population declines for sheep
46 in Units 24A and 24B. Declines in the sheep population
47 within the DHCMA are of concern to rural subsistence
48 users that rely on local populations in close proximity
49 to where they live.

50

0376

1 ANILCA Section .816(b) allows for
2 closure of Federal public lands to the harvest of fish
3 and wildlife for reasons of public safety,
4 administration, or to assure the continued viability of
5 a particular fish or wildlife population.

6
7 The proponent for WP24-26 believes that
8 the current closure of Dall sheep hunting by all users
9 authorized by the Board with Temporary Special Action
10 WSA22-02 should continue through the 2024-2026 wildlife
11 regulatory cycle and will help protect the breeding
12 population in the affected area. No harvestable surplus
13 of mature rams is currently available and any legal
14 rams left are needed for effective breeding to maximize
15 lamb production.

16
17 Historically, most of the sheep harvest
18 in the areas subject to this proposal has been by
19 non-Federally-qualified users. Since there are very
20 few, if any, legal rams available for harvest in the
21 area, closure of hunting by non-rural users could
22 provide for conservation of healthy populations of
23 sheep and allow for continuation of subsistence uses of
24 sheep.

25
26 Closure to all users is likely to help
27 ensure the continued viability of the Dall sheep
28 populations in the DHCMA. Although sheep harvest by
29 Federally-qualified subsistence users is low, sheep
30 numbers are low enough that any additional mortality
31 from harvest may be unsustainable and could slow
32 natural recovery of Dall sheep in the area.

33
34 Thank you, Madame Chair.

35
36 MADAME CHAIR PITKA: Thank you, ISC.
37 Board discussion with Council Chairs and State
38 Liaisons.

39
40 (No comments)

41
42 MADAME CHAIR PITKA: Okay. Board
43 motion, discussion and action. Yes. BLM, thank you so
44 much.

45
46 MR. MCKEE: Thank you. Madame Chair, I
47 move to adopt Proposal WP24-26 to close Dall sheep
48 hunting on Federal public lands in Units 24A and Unit
49 26B west of the Sagavanirktok River to all users for
50

0377

1 the 2024-2026 wildlife regulatory cycle. If I get a
2 second, I'll explain why I intend to vote in support of
3 my motion.

4

5 MR. BROWER: Second.

6

7 MR. MCKEE: Thank you. The Dall sheep
8 population along the Dalton Highway Corridor Management
9 Area is experiencing severe declines and there are
10 serious concerns as to its viability as is evidenced by
11 recent population estimates and minimal count surveys.

12

13 Severe weather conditions and constant
14 hunting pressure are among the reasons for these
15 declines. ANILCA Section .816(b) allows for closure of
16 Federal public lands to the harvest of a fish and
17 wildlife population for reasons of public safety,
18 administration or to assure the continued viability of
19 such population.

20

21 No harvestable surplus of mature rams
22 is evident in this population and any legal rams that
23 are left would be needed for breeding to maximize lamb
24 production. In order to protect the breeding
25 population of sheep in the affected area the closure
26 initiated by the Board through Temporary Special Action
27 WSA22-02 should continue through the 2024-2026 wildlife
28 regulatory cycle as requested by the Western Interior
29 Alaska Subsistence Regional Advisory Council, the
30 proponent for WP24-26. This is also consistent with
31 the recommendation of the North Slope Subsistence
32 Regional Advisory Council.

33

34 Thank you, Madame Chair.

35

36 MADAME CHAIR PITKA: Thank you very
37 much. Any more discussion.

38

39 (No comments)

40

41 MADAME CHAIR PITKA: Seeing none. Is
42 somebody going to call the question, please.

43

44 MR. VANORMER: Call the question.

45

46 MADAME CHAIR PITKA: Thank you very
47 much. Can we have a roll call vote, please.

48

49 MS. HOWARD: Certainly. Starting with

50

0378

1 the maker of the motion, the motion is to adopt
2 WP24-26. Bureau of Land Management, Chris McKee.

3

4 MR. MCKEE: BLM supports for the
5 reasons outlined in my motion. Thank you.

6

7 MS. HOWARD: Thank you.

8

9 Bureau of Indian Affairs, Jolene John.

10

11 MS. JOHN: The BIA votes to support the
12 motion and adopt WP24-26 as recommended by the Western
13 Interior and North Slope Councils. We concur with the
14 justification provided by the BLM and share the
15 Council's ongoing conservation concerns about the Dall
16 sheep population.

17

18 Chairman Reakoff's specific knowledge
19 and expertise regarding this population was an
20 important source of information for our vote as well.
21 Thank you.

22

23 MADAME CHAIR PITKA: Thank you, BIA.

24

25 MS. HOWARD: Fish and Wildlife Service,
26 Sara Boario.

27

28 MS. BOARIO: Fish and Wildlife Service
29 supports as recommended by the Western Interior and
30 North Slope RACs in order to protect the Dall sheep in
31 this area due to declines. The closure area from
32 Wildlife Special Action 22-02 should continue for the
33 next two regulatory years as requested.

34

35 Thank you.

36

37 MADAME CHAIR PITKA: Thank you.

38

39 MS. HOWARD: National Park Service,
40 Sarah Creachbaum.

41

42 MS. CREACHBAUM: National Park Service
43 supports Proposal WP24-26 for the reasons stated by the
44 BLM and as requested by the Western Interior Alaska
45 Subsistence Regional Advisory Council and the North
46 Slope Regional Advisory Council.

47

48 Closure of sheep hunting in this area
49 is warranted under Section .816(b) to assure the

50

0379

1 viability of the sheep population which recent surveys
2 indicate has declined substantially. No harvestable
3 surplus of mature rams is evident.

4

5 MADAME CHAIR PITKA: Thank you.

6

7 MS. HOWARD: U.S. Forest Service, Chad
8 VanOrmer.

9

10 MR. VANORMER: The Forest Service
11 supports Wildlife Proposal WP24-26 in support of and in
12 deference to the Western Interior and North Slope
13 Regional Advisory Councils for the reasons identified
14 by the Councils, ISC and as described by our BLM
15 colleague.

16

17 Thank you.

18

19 MADAME CHAIR PITKA: Thank you.

20

21 MS. HOWARD: Public Member Charlie
22 Brower.

23

24 MR. BROWER: Move to support WP24-26 as
25 submitted. Also recommendation from Western Interior
26 Subsistence Advisory Council and the North Slope
27 Subsistence Advisory Council.

28

29 MS. HOWARD: Thank you. Member Brower,
30 you have Anthony Christianson's proxy.

31

32 MR. BROWER: Support.

33

34 MS. HOWARD: Thank you. And Chairwoman
35 Pitka.

36

37 MADAME CHAIR PITKA: I vote to support
38 24-26. The population viability concerns warrant
39 closure and in deference to the comments by the
40 Regional Advisory Councils from the North Slope and the
41 Western Interior.

42

43 Thank you.

44

45 MS. HOWARD: Thank you, Madame Chair.
46 The motion passes unanimously.

47

48 MADAME CHAIR PITKA: Okay. We've got
49 one more. We're going to power through, right? Okay.

50

0380

1 WCR24-20. Let's go!

2

3 (Laughter)

4

5 MADAME CHAIR PITKA: We can do it!

6 Yeah!

7

8 (Laughter)

9

10 MADAME CHAIR PITKA: Okay, Kendra,
11 please proceed. Thank you so much.

12

13 MS. HOLMAN: Thank you, Madame Chair.
14 Members of the Council. This closure review can be
15 found on Page 1174 of your meeting book. A map of the
16 location can be found on Page 1177 of your meeting
17 book. This closure is for Unit 24B. The Kanuti
18 Controlled Use Area is currently closed to hunting of
19 moose except by Federally-qualified subsistence users.

20

21 The Kanuti Controlled Use Area was
22 created in 1979 under State regulations to address user
23 conflicts and biological concerns and is important in
24 maintaining reasonable opportunity for subsistence uses
25 of moose. In 1990, the Kanuti Controlled Use Area was
26 adopted into Federal subsistence regulations from State
27 regulations and was part of Unit 24 remainder.

28

29 In 2020, the Board voted to maintain
30 status quo on WCR20-20. While there was no conservation
31 concern for moose at the time, the subsistence needs of
32 Allakaket and Alatna were not being met. There were
33 concerns about the hard winter and deep snow from the
34 winter of 2018-2019 and potential negatives impacts to
35 the moose population.

36

37 The Koyukuk River Moose Hunters
38 Working Group in cooperation with the ADF&G developed
39 the Koyukuk River Moose Management Plan in 2001 to
40 guide moose management in the Koyukuk River Drainage in
41 response to concerns about overharvest.

42

43 The most recent population estimate was
44 in 2021 at 952 moose. High bull:cow ratios indicate
45 sufficient numbers for breeding and that bulls are not
46 being overharvested. High calf:cow ratios in seven of
47 the last 10 years suggest adequate productivity for
48 population growth.

49

50

1 In 2021 the calf:cow ratio was 22
2 calves per 100 cows, indicating a stable moose
3 population. While this number is on the low side of
4 the 20 to 30 calves per 100 cows, two of the last three
5 winters have been severe, which is thought to be a
6 factor in this ratio decline. These ratios can be
7 found in Figure 2 on Page 1183 of your meeting book.

8
9 The Harvest Management Plan prescribes
10 a maximum annual harvest rate of 5 percent for the
11 Kanuti Controlled Use Area moose population. The
12 Management Plan considers this a conservative harvest
13 rate that is necessary due to significant mortality
14 from predation.

15
16 Given the closure to non-Federally-
17 qualified users, all moose harvest on Federal public
18 lands in the Kanuti Controlled Use Area occurs under
19 Federal regulations by Federally-qualified subsistence
20 users. Users with C&T for moose in the Kanuti
21 Controlled Use Area include residents of Unit 24,
22 Galena, and Koyukuk. However, the primary harvesters
23 are from Allakaket, Alatna, Bettles, and Evansville.

24
25 Between 2006 and 2018 a total of 371
26 Federal permits were issued, ranging from 13 to 72
27 permits per year. Moose harvests under the Federal
28 registration permit totaled 37 moose during the same
29 timeframe, ranging from 0-5 moose reported harvested,
30 indicating a very low success rates. These numbers can
31 be found on Figure 4 on Page 1189 of your meeting book.

32
33 Over 95 percent of both State and
34 Federal reported harvests occurs in September in this
35 area. In 2019 at the winter Council meeting, the
36 Council Chair stated that the most recent harvest in
37 Allakaket and Alatna has been fairly low. The Koyukuk
38 River Advisory Committee reported that only nine moose
39 had been killed in these communities during the fall of
40 2018 and one in the Koyukuk Controlled Use Area.

41
42 The Kanuti CUA was closed for
43 conservation and continuation of subsistence uses
44 reasons. Biologically, the closure no longer seems
45 warranted, primarily due to very high bull:cow ratios,
46 while population estimates since 1999 indicate a stable
47 moose population. Moreover, harvest of mature bulls in
48 a population with high bull:cow ratios should not
49 materially affect population growth.

1 Annual reported harvest from Unit 24B
2 has been on the decline and most moose are harvested in
3 September. This suggests that opening the Kanuti
4 Controlled Use Area from December 15 to April 15 during
5 the winter season of the closure to non-Federally-
6 qualified users may result in a small increase in
7 reported moose harvests.

8
9 A rural subsistence priority would be
10 maintained during the Federal fall season when the
11 majority of moose are harvested. It is not clear if
12 the closure is needed for the continuation of
13 subsistence uses. Harvest data in this area is
14 limited, particularly over the last ten years.
15 However, Federally-qualified subsistence users have
16 noted that they are relying more on moose and other
17 large mammals as salmon levels have declined.

18
19 Estimated high unreported harvest rates
20 and intermittent household surveys preclude accurate
21 harvest information for Federally-qualified subsistence
22 users. Whether or not subsistence needs of Federally-
23 qualified subsistence users are being met is unknown,
24 although high bull:cow ratios indicate bull moose are
25 available for harvest and meeting subsistence needs.

26
27 A conservative approach would be to
28 modify the closure by opening the December 15 to April
29 15 season to non-Federally-qualified subsistence users,
30 followed by an evaluation of any changes in the moose
31 population, bull:cow ratios and harvest.

32
33 Maintaining a closure from August 15 to October 1
34 helps community member of Allakaket and Alatna to meet
35 their subsistence needs, while opening the winter
36 season addresses the lack of conservation concern.

37
38 The State season for moose is currently
39 open to both residents and non-residents September 5th
40 to 25th. Eliminating that closure during August 25th
41 to October 1st may bring in a larger number of
42 non-Federally-qualified subsistence users to the
43 Kanuti Controlled Use Area, potentially resulting in
44 unsustainable harvest.

45
46 The OSM conclusion for this closure is
47 to modify it, eliminating the winter season and
48 clarifying regulatory language.

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1 Thank you, Madame Chair.

2

3 MADAME CHAIR PITKA: Thank you so much.
4 Are there any questions for the analyst.

5

6 (No comments)

7

8 MADAME CHAIR PITKA: Okay. If not, can
9 I get the summary of written public comments, please.

10

11 MS. HOLMAN: Madame Chair, there were
12 no written public comments received on this closure
13 review.

14

15 MADAME CHAIR PITKA: Can I get the
16 summary of the Tribal and the ANCSA consultation.

17

18 MR. LIND: Thank you, Madame Chair.
19 Orville Lind, Native Liaison for OSM. During the
20 November 14 consultation we did not have any questions
21 or comments.

22

23 Thank you, Madame Chair.

24

25 MADAME CHAIR PITKA: Thank you for
26 that. Tribal and Native organization and ANCSA
27 testimony right now.

28

29 (No comments)

30

31 MADAME CHAIR PITKA: I don't see any
32 hands going up in the room. Is there anything online,
33 Lisa?

34

35 MS. GREDIAGIN: (Shakes head
36 negatively).

37

38 MADAME CHAIR PITKA: Awesome. Okay.
39 So we are at advisory group testimony, State ACs, SRCs,
40 working groups, et cetera.

41

42 (No comments)

43

44 MADAME CHAIR PITKA: Okay. So I'd like
45 to open the floor to public testimony at this time.

46

47 (No comments)

48

49 MADAME CHAIR PITKA: I didn't receive

50

0384

1 any cards, so I'm looking around the room and looking
2 to see if there's any hands raised online.

3

4 (No comments)

5

6 MADAME CHAIR PITKA: Okay. So Regional
7 Advisory Council recommendation.

8

9 MR. REAKOFF: Thank you, Madame Chair.
10 Jack Reakoff, Western Interior Council Chair. The
11 council reviewed this closure. The Council was opposed
12 to elimination of the fall component of the closure.
13 The Council is concerned with the current number of
14 non-local hunters that come into the area adjacent to
15 the closure area during the fall and is also concerned
16 that the declining moose populations in other areas in
17 the region result in even greater influx of non-local
18 hunters into the area if the closure is entirely
19 eliminated.

20

21 The Council is supportive of
22 eliminating the winter portion of the closure as
23 harvest limits of one antlered bull with few non-locals
24 currently attempting to participate in the current
25 State winter hunt, concurrent State winter hunt,
26 indicating no Federally-qualified subsistence users
27 would be displaced while participating.

28

29 We asked the area biologist what the
30 participation rates were for non-locals adjacent to
31 this area. There's virtually very little
32 participation. Basically the bulls don't have antlers
33 or very small antlers.

34

35 The Council looks forward to being
36 updated on ongoing moose survey results in the area.
37 The last survey results in 2021 showed three yearling
38 bulls per 100 cows. The way you read that is if you
39 only have three yearling bulls, you only got three
40 yearling cows. That means you only had six recruited
41 calves into the recruitment.

42

43 We've had some bad winters since then,
44 so we can anticipate -- and what I see in the field, I
45 live really close to this area, I see very few young
46 moose in the population. I've only seen one
47 two-year-old bull all fall. Most of the moose that you
48 see are larger bulls, in between the 6 to 10 year old
49 age class. That's what we have right now, so we don't
50

0385

1 have a lot of recruiting moose. So we can't expect
2 this population to be growing a whole lot without
3 recruitment.

4

5

6 This is the first year where the snow
7 depths have been below what we've -- and are at two
8 feet right now, 26 inches of snow on the ground, which
9 is nothing for our moose. So we should start to see a
10 turnaround, but at this time we cannot encourage a lot
11 of additional harvest by non-Federally-qualified users.

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Thank you, Madame Chair.

MADAME CHAIR PITKA: Thank you very
much. That was the only Regional Advisory Council for
this proposal, correct? Okay, thank you. Alaska
Department of Fish and Game comments.

MR. MULLIGAN: Thank you, Madame Chair.
The Alaska Department of Fish and Game supports
rescinding this closure in its entirety. The
Department feels that there's no longer a conservation
concern or it would endanger the continued subsistence
uses if opened.

In looking at available survey data and
extrapolations the Unit 24B moose population estimate
for 2022 was 3,203 moose, which provides for an annual
harvestable surplus of 118 to 203 moose as at the
prescribed harvest rate of five percent.

If you look at the average annual
harvest in 24B, you're looking at 65 moose roughly.
Half of that is reported and then the other half is
estimated because it's unreported. Therefore, the
estimated harvest comes nowhere close to the
harvestable surplus that I just stated of 118 to 203
moose.

Subsequently, Unit 24B can support an
additional harvest of up to 53 to 138 moose. Because
moose estimates in this area are based upon observed
moose, the actual annual harvest rates are considered
conservative and likely lower than two percent.

Since 1992 the Alaska Board of Game and
this body have repeatedly affirmed that a harvestable
surplus exists with numerous extensions in Unit 24B.
In 1992 there were 32 days of State and Federal moose

0386

1 hunting. There are currently 146 days of State and 255
2 days of Federal moose hunting opportunity in 24B.

3
4 After Staff investigated the history of
5 this closure they found in the transcripts of the April
6 9th, 1992 Federal Subsistence Board meeting when the
7 Kanuti closure was adopted that Federal Subsistence
8 Board members could not reconcile the data presented,
9 but voted to close the Controlled Use Area anyway.

10
11 The justification for the closure in
12 1992 used incorrect data and subsequent reviews of the
13 closure have not looked into that decision.
14 Furthermore, the participants in the discussion did not
15 understand how harvestable surplus is calculated and
16 did not understand that harvestable surplus is the
17 surplus of moose that is available after all other
18 mortality factors have been accounted for.

19
20 The transcripts and the excerpts you
21 will find in our written testimony demonstrate
22 participants were subtracting moose mortality due to
23 wolves from the harvestable surplus after wolf
24 mortality had already been accounted for. They were
25 clearly double counting wolf mortality into the
26 available harvestable surplus.

27
28 This longstanding misunderstanding has
29 have never been addressed in any of the previous
30 closure reviews and the misapplication of the closure
31 has persisted. The moose population and harvest
32 estimates have changed very little since 1992 and the
33 moose population in 24B continues to provide more than
34 twice as many moose than are harvested.

35
36 Just on one final note, just to point
37 out this is a Controlled Use Area under State
38 regulations, which means that the area is closed to the
39 use of aircraft for hunting moose, including
40 transportation of moose hunters, their gear and/or
41 parts of moose. However, and we will note that this
42 prohibition does not apply to the transportation of
43 moose hunters, their gear or parts by aircraft between
44 publicly-owned airports.

45
46 Thank you, Madame Chair.

47
48 MADAME CHAIR PITKA: Thank you. Thank
49 you for that clarification also. The InterAgency Staff
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0387

1 Committee comment, please.

2

3 MS. LAVINE: Thank you, Madame Chair.
4 Members of the Board. The InterAgency Staff Committee
5 provided their standard comment. Thank you.

6

7 MADAME CHAIR PITKA: Thank you for
8 that. So Board discussion with Council Chairs and the
9 State Liaison. So if there's any questions for the
10 Board Chair now would be the time.

11

12 (No comments)

13

14 MADAME CHAIR PITKA: Okay. At this
15 time I'd like to entertain a Board motion, discussion
16 and action. Thank you.

17

18 MS. BOARIO: Madame Chair. I move to
19 modify WCR24-20 as modified by OSM. If I get a second,
20 I will explain why I intend to support my motion. This
21 is the Fish and Wildlife Service for the record.

22

23 MR. BROWER: Second.

24

25 MS. BOARIO: Thank you, Charlie. Thank
26 you, Madame Chair. The OSM modification proposes to
27 eliminate the closure during the winter season and
28 clarify regulatory language. This modification was
29 supported by the Western Interior Council.

30

31 Biologically the closure in the Kanuti
32 Controlled Use Area no longer seems warranted due to
33 population estimates that indicate a stable moose
34 population. However, to continue subsistence uses in
35 the area and provide opportunity for Federally-
36 qualified subsistence users who rely on moose,
37 especially during the time of substantially lower
38 salmon returns, it is warranted to maintain the
39 subsistence priority during the Federal fall season
40 when most of the moose are harvested.

41

42 As the OSM analysis notes, the
43 situation shows the importance of considering the
44 entire subsistence harvest and use. The Council is
45 also concerned with pressure from non-local hunters
46 that come into the area during the fall, but see little
47 biological concern with the few non-locals that
48 participate in the winter hunt.

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1 The OSM modification is a reasonable
2 compromise in deference to the Council and in support
3 of the continuation of subsistence uses, which I
4 support.

5

6 Thank you, Madame Chair.

7

8 MADAME CHAIR PITKA: Thank you very
9 much, Member Boario. I appreciate that. Is there any
10 discussion on the motion as presented.

11

12 (No comments)

13

14 MR. MCKEE: Second. Question, sorry.

15 Long day.

16

17 (Laughter)

18

19 MADAME CHAIR PITKA: Thank you so much
20 for that. Now can we have a roll call vote and then I
21 think we're done.

22

23 MS. HOWARD: Certainly, Madame Chair.

24

25 Starting with the maker of the motion,
26 Fish and Wildlife Service, Sara Boario.

27

28 MS. BOARIO: Fish and Wildlife Service
29 supports.

30

31 MS. HOWARD: Thank you.

32

33 Bureau of Indian Affairs, Jolene John.

34

35 MS. JOHN: The BIA votes to support the
36 motion and the recommendation of the Western Interior
37 Council to modify this wildlife closure, which would
38 remove the winter hunt restriction for non-subsistence
39 hunters. We concur with the justifications provided by
40 the Council and U.S. Fish and Wildlife Service. That's
41 the basis for our vote.

42

43 Guyana. Thank you.

44

45 MADAME CHAIR PITKA: Thank you.

46

47 MS. HOWARD: Bureau of Land Management,
48 Chris McKee.

49

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0389

1 MR. MCKEE: BLM supports modifying the
2 closure as recommended by OSM to eliminate the closure
3 during the winter season and clarify regulatory
4 language. The moose population within the Kanuti
5 Controlled Use Area appears to be stable; however, the
6 Western Interior Alaska Council is concerned about the
7 potential large influx of hunters should the fall
8 season closure be lifted.

9
10 Modifying the closure to allow for the
11 opening of the winter season is a reasonable
12 compromise, will help continue the subsistence uses of
13 moose in the area and is consistent with the
14 recommendation of the Western Interior Alaska
15 Subsistence Regional Advisory Council.

16
17 Thank you.

18
19 MADAME CHAIR PITKA: Thank you.

20
21 MS. HOWARD: National Park Service,
22 Sarah Creachbaum.

23
24 MS. CREACHBAUM: The NPS supports with
25 the OSM modification as supported by the Western
26 Interior Council. Thank you.

27
28 MADAME CHAIR PITKA: Thank you.

29
30 MS. HOWARD: U.S. Forest Service, Chad
31 VanOrmer.

32
33 MR. VANORMER: The Forest Service
34 supports modifying WCR24-20 as recommended by OSM and
35 in deference to the Western Interior Regional Advisory
36 Council. Specifically the closure no longer seems
37 warranted due to high bull:cow ratios and population
38 estimates since 1999 indicate a stable moose
39 population. In addition, few non-local hunters
40 participate in the winter hunt, thereby not impacting
41 Federally-qualified subsistence users.

42
43 Thank you, Madame Chair.

44
45 MADAME CHAIR PITKA: Thank you very
46 much.

47
48 MS. HOWARD: Public Member Charlie
49 Brower.

50

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1 MR. BROWER: Move to support WCR24-20
2 with OSM modification and supported by Western Interior
3 Regional Advisory Council.

4
5 MS. HOWARD: Thank you, Public Member
6 Brower. You also have Anthony Christianson's proxy.

7
8 MR. BROWER: Support.

9
10 MS. HOWARD: Thank you. Madame Chair.

11
12 MADAME CHAIR PITKA: Thank you. I
13 support modifying the closure as recommended by OSM
14 under the recommendation of the Western Interior Alaska
15 Subsistence Regional Advisory Council because of the
16 reasons already stated by several of my esteemed
17 colleagues.

18
19 MS. HOWARD: Thank you, Madame Chair.
20 The motion passes unanimously.

21
22 MADAME CHAIR PITKA: Thank you very
23 much. So at this time I would like to recess until
24 9:00 a.m. tomorrow, but I'd also like to remind
25 everybody about the reception tonight at 49th State
26 Brewing beginning at 6:00 p.m. to 9:00 p.m. There will
27 be good food, great company and door prizes. So please
28 attend. It's a reception hosting the North Pacific
29 Fisheries Management Council and Federal Subsistence
30 Board members and attendees.

31
32 Thank you. Also in the morning we will
33 begin promptly at 9:00 a.m. and we will begin with WP
34 -- no.

35
36 MS. HOWARD: No. WCR24.....

37
38 MADAME CHAIR PITKA: WCR24-04/06.

39
40 MS. HOWARD: Yes.

41
42 MADAME CHAIR PITKA: That's where we'll
43 begin tomorrow. We have a lot of work to do tomorrow,
44 so I appreciate all your hard work today.

45
46 Thank you.

47
48 (Off record)

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(PROCEEDINGS TO BE CONTINUED)

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