

# ALASKA

## PROFESSIONAL HUNTERS ASSOCIATION, INC.

P.O. Box 240971 ~ Anchorage, AK 99524

Phone: (907) 929-0619

Email: [office@alaskaprohunter.org](mailto:office@alaskaprohunter.org) ~ [www.alaskaprohunter.org](http://www.alaskaprohunter.org)

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Erin Mathews  
Tongass Plan Revision Coordinator  
Tongass National Forest Supervisor's Office  
648 Mission Street, Suite 110  
Ketchikan, AK 99901-6591  
[SM.FS.TNFRevision@usda.gov](mailto:SM.FS.TNFRevision@usda.gov)

RE: Comments of Alaska Professional Hunters Association on the Tongass National Forest Plan Revision, Draft Assessments Stage

Dear Ms. Mathews:

The Alaska Professional Hunters Association respectfully submits these comments on the Tongass National Forest Plan Revision and the Draft Assessments released by the US Forest Service on January 10, 2025.

The Alaska Professional Hunters Association (APHA) is Alaska's association of hunting guides. Many of APHA's members live and work in rural Alaska and are federally-qualified subsistence hunters when hunting in their personal lives, in addition to being committed to providing their clients with excellent guided hunting experiences. The clients are generally not residents of rural Alaska and thus not federally-qualified subsistence hunters. APHA also counts both Native and non-Native hunters among its members and represents the concerns and needs of both groups.

APHA has read through the multiple Draft Assessment documents (which we will call "chapters") that the US Forest Service (USFS) made available on the USFS website,<sup>1</sup> and we value the extensive work represented in those documents. We also appreciate the Forest Service's discussion of studies on the significant positive economic impacts that guided hunting has on rural Alaska economies. We understand the very early stage at which this project currently sits, and we appreciate the opportunity to suggest some ways to strengthen the eventual draft of the revision plan, which we understand will later be put out for another round of public comment.

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<sup>1</sup> <https://www.fs.usda.gov/detail/tongass/landmanagement/planning/?cid=fseprd1219696>

I. *Legal Bases for Non-Subsistence and Subsistence Hunting.*

The draft assessment chapter entitled *Subsistence and Other Harvest (Non-Commercial) Resource Assessment*<sup>2</sup> is structured in a way that emphasizes subsistence hunting by indigenous residents and obscures (a) the non-racial and non-tribal nature of federally qualified subsistence hunting, which under ANILCA is expressly open to all “rural Alaska residents,” regardless of their race or whether they come from an indigenous background,<sup>3</sup> (b) the role of state-qualified subsistence hunting, which is open to urban as well as rural Alaskans, and (c) the role of general non-subsistence hunting, which is open to all citizens and brings much cash to rural Alaskan economies.

We respectfully suggest that the chapter be re-titled as “Hunting” or “Subsistence and Non-Subsistence Hunting” and that the chapter devote equal weight and space to all major forms of hunting, rather than focus mostly on federally-qualified subsistence hunting.

The *Subsistence* chapter notes but fails to sufficiently emphasize a key ANILCA provision that prevents non-subsistence hunting from being restricted in favor of federally-qualified hunters unless scarcity or certain other narrow scenarios occur.<sup>4</sup> This substantially limits the extent and applicability of the “subsistence priority,” but the casual reader will likely miss that point. Additionally, ANILCA states that one of its “purposes” is to “preserve” wilderness recreational activities including “sport hunting,” which is a term for non-subsistence hunting.<sup>5</sup> Further, the Secretaries of Agriculture and the Interior must allow the use of temporary hunting facilities on public lands open to hunting.<sup>6</sup> This directive applies equally to subsistence and non-subsistence hunting, which shows that hunting generally, including non-subsistence hunting, is preferred in the law. Further, USFS generally defers to State laws regarding hunting, which is a reason the Service should refrain from administratively creating or magnifying priorities among different types of hunting, and should observe ANILCA’s limits.<sup>7</sup>

So much space is given to Native subsistence hunting in both *The Tongass as an Indigenous Place Draft Assessment*<sup>8</sup> chapter and the *Subsistence* chapter that non-Native subsistence hunting takes a much lower apparent priority. APHA’s assumption is

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<sup>2</sup> [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd1221272.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1221272.pdf), hereinafter “*Subsistence*”

<sup>3</sup> ANILCA § 803.

<sup>4</sup> See ANILCA § 802(2) (“subsistence uses of fish and wildlife ... shall be the priority consumptive use of all such resources on the public lands of Alaska **when it is necessary** to restrict taking [by non-subsistence hunters] in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such populations ....”) (emphasis added). See also, ANILCA § 815(3) (clarifying the limited circumstances in which non-subsistence hunting can be restricted).

<sup>5</sup> ANILCA § 101(b).

<sup>6</sup> ANILCA § 1316.

<sup>7</sup> 36 C.F.R. 261.8.

<sup>8</sup> [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd1221271.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1221271.pdf), hereinafter “*Indigenous*”

not that USFS intended to weight the discussion thus, but when one of the Draft Assessment documents states that, “[s]ubsistence is...used to refer to what Native people consider a thriving cultural lifestyle,” (*Indigenous*, p. 38), it is easy to come away with the impression that subsistence hunting refers only to Natives, not to non-Native rural residents who also depend on hunting and are federally-qualified subsistence users.

A more complete discussion of these legal authorities should be added to a chapter which should be called *Hunting*, to avoid giving the impression that certain forms of hunting have a priority greater than they actually have under applicable law.

II. *Discussions of Hunting (or Harvest)<sup>9</sup> From Other Chapters Should Be Consolidated into the Hunting Chapter*

Currently, there are considerable discussions of hunting in several different Draft Assessment documents. Most significantly, the *Indigenous* chapter discusses indigenous subsistence hunting, while the *Subsistence* chapter discusses subsistence hunting broadly. There are a few references to non-subsistence hunting. The *Draft Recreation & Tourism Resource Assessment<sup>10</sup>* has some discussion of guided hunting (though generally combined with outfitters and other guided non-harvest activities).

Similarly, although *Recreation* contains some solid data on the importance of commercial guided hunting to the Alaska economy, there is almost no mention of non-subsistence hunting in the extensive hunting discussions in *Subsistence* and *Indigenous*. This appears to prioritize subsistence hunting over non-subsistence hunting, which is only appropriate in very limited circumstances under ANILCA. See Section I, above.

The effect of this dispersal of the discussion of guided hunting and other forms of non-subsistence hunting is that important factors are so far separated in discussion that they are given unequal weight over the body of the document.

Hunting is important to the Alaska way of life and the Alaska economy, and the Plan Revision should give “hunting” its own section, where the weight of the discussion can be appropriately and clearly divided between subsistence and non-subsistence hunting, as well as Native, non-Native resident, and nonresident hunting.

III. *Economic Impacts*

The various Draft Assessment documents have some good information of the impacts of hunting and other kinds of harvest on the Alaska economy, both through their effects on subsistence and the magnitude of need for grocery supplements, and through the commercial nature of guided harvest and the tourism industry surrounding it. This is

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<sup>9</sup> We acknowledge that, as an association of hunters, we tend to use hunting-focused language, but hunting is appropriately included with fishing and gathering under the term “harvest” in some of the Draft Assessment documents, and we do not object to the new chapter covering harvest, rather than just hunting.

<sup>10</sup> [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd1220697.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1220697.pdf), hereinafter “*Recreation*”

another area, however, where good information contained in the Draft Assessments is muted by its isolation from other relevant information.

The Draft Assessment documents lose some of the impact of their information on guided harvest by combining it in category and discussion with outfitters and guides who do non-harvest activities – hiking, boating, wildlife viewing, etc. As noted, “...raw numbers can’t fully illustrate the importance of fishing and hunting on the Tongass, both for regional residents and for visitors from afar. Commercially guided fishing and hunting trips serve thousands of visitors every year and contribute millions of dollars to the regional economy...” (*Recreation*, p. 23). The Draft Assessment’s own language, then, suggests that guided harvest deserves its own place within the greater discussion on commercial recreation.

Notably, much of income derived from guided harvest remains local to the Tongass area. As the *Draft Socioeconomic Assessment*<sup>11</sup> notes:

Guided hunting is also a big draw for visitors to Tongass National Forest. In 2023, 418 guided hunting trips took place on the forest, for black and brown bears, deer, elk, moose, mountain goat, waterfowl and small game. In 2012 in the state of Alaska, guided hunting provided \$13 million in wages statewide and \$3.4 million in spending for goods and services in Southeast Alaska (McDowell Group 2014). That same year, the Alaska Professional Hunters Association reported that nine out of ten guides were Alaska residents, meaning wages remain in local economies for goods and services. Additionally, Alaska guides distributed tens of thousands of pounds of game meat to residents in the state, supporting food supplies in rural areas....

p. 47. This important data about the local economic impact of guided harvest is, again, completely separated from other harvest and recreation information, so there is very little context for it within the *Socioeconomic* chapter, and it is data that is completely missing from any of the discussions of harvest.

Another piece of the economic impact, which is only lightly touched upon in the Draft Assessment documents, is the distinguishing line between visitors who come to the area for guided harvest activities and visitors who come on cruise ships. When visitors come for guided harvest purposes, the money they spend tends to remain part of the local economy – they pay local guides, local accommodations and food, and local businesses. Cruise ship visitors are more likely to leave more of their money with cruise lines – accommodations and food are both cruise line costs, guided excursions are limited to those companies that work with the cruise lines, and spending at other local businesses is limited by proximity to the cruise ship docks. As the Draft Assessment notes, “While most users who use the Forest for activities such as hiking, hunting, and fishing, are residents, many cruise ship passengers view the Forest.”<sup>12</sup> Although this is

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<sup>11</sup> [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd1220701.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1220701.pdf), hereinafter “*Socioeconomic*”

<sup>12</sup> *Draft Scenic Resource Assessment*, p. 5, [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd1220704.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1220704.pdf)

intended as commentary on the importance of the scenic resources, it also serves as an observation on the level of interaction that different kinds of visitors have with the local economy – cruise ship visitors tend to be passive viewers.

IV. Infrastructure Impacts

The Draft Assessment on *Lands: Status, Ownership and Uses*<sup>13</sup> notes several kinds of infrastructure uses that are mainly or exclusively used for harvest purposes (ANILCA cabins; temporary campsites, facilities, and equipment). These seem to be separate from the cabins discussed in *Recreation* (though the separation is unclear as presented in the different chapters), most of which have more overlap with other activities in their use. The essential nature of this infrastructure to harvest of all kinds (hunting, fishing, and gathering; subsistence and non-subsistence; Native and non-Native; resident and nonresident) should be emphasized, both in the section on harvest and in any discussion of infrastructure.

V. Conclusion

APHA appreciates the opportunity to comment on the Draft Assessment documents.

Respectfully submitted,



Thor Stacey  
Government Affairs Director  
Alaska Professional Hunters Association

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<sup>13</sup> *Lands: Status, Ownership and Uses*, p. 12  
[https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd1221098.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1221098.pdf)