ALASKA DEPARTMENT OF FISH AND GAME

STAFF COMMENTS

SOUTHEAST REGION PROPOSALS

ALASKA BOARD OF GAME MEETING

KETCHIKAN, ALASKA

JANUARY 20-24, 2023

The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, January 20-24, 2023 in Ketchikan, Alaska, and are prepared to assist the public and board. The stated staff comments should be considered preliminary and subject to change, if or when new information becomes available. Final department positions will be formulated after review of written and oral testimony presented to the board.

PROPOSAL 1 – 5 AAC 92.003. Hunter Education and Orientation Requirements.

PROPOSED BY: Juneau Douglas Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would add hunter education requirements for a person born after January 1, 2010, to hunt in Units 1 – 5. Beginning January 2025, a person born after January 1, 2010, that is required to have a hunting license must have successfully completed a certified hunter education course in order to hunt in Units 1 – 5. Additionally, if you are under 18 years of age, you must have either successfully completed a certified hunter education course or be under the direct immediate supervision of a licensed hunter who is: (a) 18 years of age or older and has successfully completed a certified hunter education course OR (b) born on or before January 1, 2010.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.003. Hunter education and orientation requirements

(a) Beginning August 1, 2002, a person born after January 1, 1986, that is

(1) required to have a hunting license must have successfully completed a certified hunter education course in order to hunt in Units 7, 13, 14, 15, and 20;
(2) not required to have a hunting license, and who has not successfully completed a certified hunter education course, must, in order to hunt in Units 7, 13, 14, 15, and 20, be under the direct immediate supervision of a licensed hunter who

(A) is 18 years of age or older and has successfully completed a certified hunter education course; or
(B) was born on or before January 1, 1986.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would require hunter education certification to hunt in Units 1 – 5 or be under the direct supervision of someone who is 18 years of age or older who has successfully completed a hunter education course or with someone born before January 1, 2010. Adoption of this proposal may limit the numbers of hunters that may hunt in Southeast Alaska. Enforcement of this regulation is likely to be very difficult.

BACKGROUND: Hunter education was established in Alaska in 1973 and since then over 50,000 students have received their hunter education certification. Bowhunter education, muzzleloader education, and crossbow education have also become part of the certification courses offered by the ADF&G Hunter Information and Training (HIT) Program. All instruction has been done by HIT Program staff (8 employees) and volunteers, with a current volunteer instructor base of close to 500 instructors statewide. Most hunter education courses are available online with an accompanying in-person field course.

Prior to August 2002, hunter education certification was not required for hunters wishing to hunt in Alaska, except for those using the Anchorage Coastal Wildlife Refuge and the Mendenhall

Wetlands State Game Refuge—both of which are waterfowl-oriented hunts—and for black bear and small game hunts in the Eagle River Management Area. In 1997, the Alaska Board of Game (BOG) passed regulations requiring hunter education certification for big game hunting in Game Management Units (GMUs) 7, 13, 14, 15, and 20. These regulations took effect in August 2002.

DEPARTMENT COMMENTS: The department is **Neutral** on this proposal.

While the department is in favor of certification courses to educate hunters and decrease firearm incidents, the logistical barriers of Southeast Alaska would make it extremely difficult to reach every hunter who would be required to complete hunter education under this regulation. Normally diligent subsistence users who live in GMUs 1-5 may find it difficult to comply due to these logistics and thus their reasonable opportunity to take an animal for subsistence uses may be affected.

Should this proposal be adopted, the department has two recommendations:

1. Change the date requirement to January 1, 1986, instead of January 1, 2010, so it matches current date requirement for other Units with hunter ed requirements.
2. The language in the proposal is confusing regarding the January 1, 2010, date and those requiring a hunting license. The department recommends the board consider matching the language of this proposal to the language of the current hunter ed requirements which reads:

   If you were born after January 1, 1986, and are 18 years old or older, you must have either successfully completed a Basic Hunter Education course or be under the direct immediate supervision of a licensed hunter who:
   (a) Is 18 years of age or older and has successfully completed a Basic Hunter Education course, OR
   (b) Was born on or before January 1, 1986.

COST ANALYSIS: Adoption of this proposal will result in a significant increase in costs to the department to pay for HIT Program staff and volunteers to travel to every community in Southeast Alaska (~16 communities) to deliver hunter education classes, and to purchase additional equipment to be used during the hunter education course. There would also be a cost to an individual hunter who may be required to gain certification.

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PROPOSAL 2 – 5 AAC 92.003 Hunter education and orientation requirements.

PROPOSED BY: Brian Watkins

WHAT WOULD THE PROPOSAL DO? Require that all mountain goat hunters in Units 1-5 review goat education information and take a quiz on determining male from female animals.

WHAT ARE THE CURRENT REGULATIONS Currently there are no requirements for mountain goat education prior to hunting across Southeast Alaska and there are no goat education requirements currently as part of 5 AAC 92.003. There is a requirement to take a goat quiz in parts of Unit 1A and 1B and Unit 1D as stipulations of the registration permit.

There is a positive C&T use finding for mountain goats in all of Units 1-5, excluding Unit 3 and Unit 2, outside of the nonsubsistence areas, with various ANS.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted the proposal may help hunters target male mountain goats by requiring them to review information on determining visual differences between male and female goats and then take a quiz to demonstrate their understanding of identifying features of male mountain goats. Mountain goats populations are sensitive to female harvest. With improved male/female identification the intent is a reduction in female harvest resulting in additional hunting opportunity.

BACKGROUND: Hunters were required to review information and take a quiz in Unit 1D on determining male from female goats starting in 2016. This effort was initiated because of high nanny harvest in this unit. Because of the demographics of the species, mountain goats can be difficult to manage when nannies are harvested. Nannies do not breed until they are about 5 years old, and females in non-introduced populations of goats normally only have a kid every other year with the occurrence of twins being very rare. Most nannies live to about 10-12 years old and so on average a female will have 3-4 kids in her lifetime. If one-half of those kids are females, then a nanny is just barely replacing herself and that is only if the kids survive to become breeding adult females. However, kid survival is low in most populations in Southeast Alaska. This stresses how important females are to mountain goat populations. Across the Region, the department currently manages goat populations with a guideline harvest level harvest point system, where for every 100 adult goats counted during a survey, there are 6 goat points allowed for harvest. A billy is assigned 1 point, and a nanny is assigned 2 points in an attempt to encourage hunters to harvest billies. Mountain goat harvest is managed by assigning points according to the number of goats estimated in aerial surveys. If all billies are harvested, roughly 6% of the count will be harvested, but if nannies are harvested then roughly 3% of the count will be harvested. When the guideline harvest level reaches zero, the hunt is closed by emergency order before the end of the season.

While education is certainly important, the impact of education and associated quiz has been minimal in GMU 1D where it has been mandatory since 2016. The first year of the quiz, nanny

harvest was 46% and since then has ranged from 13-32% (Figure 2-1). Penalties for taking nannies seems to have a greater impact. For example in GMU 4, management units were shut down the year after a nanny was taken and nanny harvest was just over 10% (2012-2016), but since that practice has been relaxed, nanny harvest has increased to as much as 32% in 2021. Across Units 1-5 over the last 5 years, nanny harvest has varied from 7% in Unit 1C in 2018 to 35% in Unit 1B in 2021 (Figure 2-1).

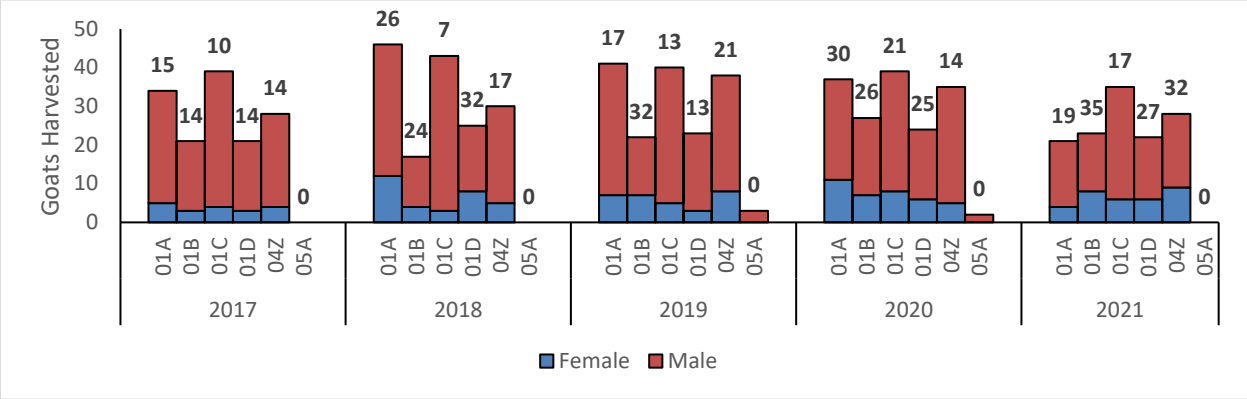

Figure 2-1. Mountain goat harvest for Southeast Alaska over the last 5 years, by subunit and delineated by male and female harvest. The percentage of female harvest is labeled above each bar.

DEPARTMENT COMMENTS: The Department is **NEUTRAL** on this proposal. There is little evidence showing that the current education campaign is overly successful, and the department is able to manage goat populations and the harvest with or without requiring educational material and a quiz. If adopted, the board should determine if the regulations continue to provide a normally diligent participant a reasonable opportunity of success in taking a goat for subsistence uses.

COST ANALYSIS: Adoption of this proposal would require integration of the quiz into the WinfoNet permit system and monitoring to make sure all hunters have taken the quiz, which will require a minimal amount of funding.

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PROPOSAL 3 – 5 AAC 92.165 Sealing of bear skins and skulls.

PROPOSED BY: Mark Freshwaters

WHAT WOULD THE PROPOSAL DO? Eliminate the sealing requirement for black bear skulls in Game Management Units 1 – 4.

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 92.165 (a) Sealing is required for hides and skulls of brown bears taken in any unit in the state, hides and skulls of black and brown bears taken in any unit in the state before the hide or skull is sold, hides and skulls of black bears

of any color variation taken from January 1 through May 31, and skulls of black bears of any color variation taken from June 1 through December 31 in Units 1 - 7, 14(A), 14(C), 15 - 17, and 20(B). The seal must remain on the skin until the tanning process has commenced. A person may not possess or transport the untanned skin or skull of a bear taken in a unit where sealing is required, or export from the state the untanned skin or skull of a bear taken anywhere in the state, unless the skin or the skull, or both as required in this section have been sealed by a department representative within 30 days after the taking,

. . .

(b) A person who possesses a bear taken in a unit where sealing is required for both the skin and the skull shall keep the skin and skull together until a department representative has removed a rudimentary premolar tooth from the skull and sealed both the skull and the skin. A person who possesses a bear taken in a unit where sealing is required only for the skull shall keep the skull until a department representative has removed a rudimentary premolar tooth from the skull and sealed the skull. The department may require that the skull of the bear be skinned and that the skin and skull not be frozen at the time of sealing.

(c) Except as provided in (a)(3) and (d) of this section, a person who takes a bear in a unit where sealing is required must personally present the skin or the skull, or both, as required in (a) of this section, to a department representative for sealing within 30 days after the taking, or a shorter time if requested by the department, and must sign the sealing certificate at the time of sealing.

(d) A person who takes a bear in a unit where sealing is required, but is unable to present the skin or skull, or both, as required in (a) of this section in person, must complete and sign a temporary sealing form and ensure that the completed temporary sealing form, along with the bear skin or skull, or both, as required in (a) of this section, are presented to a department representative for sealing within 30 days after the taking

. . .

(f) A person may not falsify any information required on the sealing certificate or temporary sealing form provided by the department.

(g) As used in this section,

(1) "sealing certificate" means a form used by the department for recording information when sealing a bear;

(2) "temporary sealing form" means a form available at department offices for providing information regarding date and location of bear kill, species of bear, name and address of the hunter, name of the guide, and other information requested by the department on the form.

5 AAC 92.220 (a) Subject to additional requirements in 5 AAC 84 - 5 AAC 85, a person taking game shall salvage the following parts for human use:

(3) from January 1 through May 31, the hide, skull, and edible meat as defined in 5 AAC 92.990, from June 1 through December 31, the skull and either the hide or edible meat of a black bear taken in a game management unit in which sealing is required;

(4) from January 1 through May 31, the edible meat, and from June 1 through December 31, either the hide, or the edible meat as defined in 5 AAC 92.990, of a black bear taken in any game management unit in which sealing is not required; …

There is a positive customary and traditional (C&T) use finding for black bears in all of Units 1-4, outside of the nonsubsistence areas, with various amounts reasonably necessary for subsistence (ANSs).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Hunters would not be required to seal skulls, although as this proposal is written, they would still be required to seal hides or meat and present evidence of sex in cases when hides are not kept but meat is salvaged. Data collected at the time of sealing are often the only annual information the department has on black bear harvest and population indicators because of the inability to survey bears in Southeast Alaska. As written, this proposal does not avoid the presentation of the harvested bear to a Fish and Game authority or approved sealer.

By removing the requirement in regulation for residents to seal black bear skulls, the requirement to salvage them will also be removed. Hunters that are residents of Alaska would no longer be required to salvage the skulls of black bears harvested in Units 1-4.

BACKGROUND: Hunting regulations for 1971-1972 are the first to indicate that black bear hides and skulls must be sealed. Before that just brown and polar bear skulls required sealing. Southeast Alaska management reports from that time report that 1973 was the first year that sealing of skulls was required. Since initially required in the early ‘70s, sealing has been mandatory in Southeast Alaska. Black bears are an Appendix II species under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), which is an international agreement between governments with the aim to ensure that international trade in specimens of wild animals and plants does not threaten the survival of the species. The seal applied to hides and skulls at the time of sealing complies with CITES permitting and certificate requirements, thus allowing for transport out-of-state.

Several important samples are collected from the skull at the time of sealing. These include skull size measurements (length and width), a tooth for aging, and tissue for genetics. Data from skull size and tooth age are used in making management decisions (Table 3-1) and help monitor black bear populations. Management based on hunter harvest and these indices are the most common metrics used to make management decisions in Southeast Alaska.

Table 3-1. Management objective for skull size for black bears applied to each Game Management Unit in Southeast Region 1.

GMU	Management Strategy*
Unit 1A	Maintain an average male spring skull size of at least 17.5 inches.
Unit 1B	Maintain an average male spring skull size of at least 17.5 inches.
Unit 1C	Maintain an average male spring skull size of at least 17.5 inches.
Unit 1D	Maintain an average male spring skull size of at least 17.0 inches.
Unit 2	Maintain an average skull size of at least 19.1 inches for male bears harvested each spring (January–June) or 18.0 inches for all males taken during a regulatory year.
Unit 3	Maintain an average spring skull size and an average annual male skull size of at least 18.5 inches.
Unit 4	Black bears do not occur in Unit 4
Unit 5	Maintain a mean annual male skull size of at least 17.0 inches.

*Skull size is length + width.

Salvage requirements are directly tied in regulation to sealing requirements. If the sealing requirements are removed in 5 AAC 92.165, the salvage requirements in 5 AAC 92.220 also go away.

DEPARTMENT COMMENTS: The Department is **OPPOSED** to this proposal. The information collected during sealing is a key component of the Department's management strategy for black bears in Southeast Alaska. In addition, Unit 5 was not included in this proposal, which if adopted, would result in fragmented sealing requirements in Southeast Alaska. If adopted, the board should discuss removing the sealing requirement for black bear hides and keeping the salvage requirement for black bear skulls as well. There are currently no separate salvage and sealing requirements for residents and nonresidents, and adoption of this proposal will introduce a new level of complexity for black bear hunters and sealers. Staff are generally available Monday-Friday, 8AM-5PM to seal bears. If able, staff often will meet hunters at off times and on the weekends, and the Alaska Wildlife Troopers may be able to seal with department staff are not available.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 4 – 5 AAC 85.020(a)(1) Hunting seasons and bag limits for brown bear.

PROPOSED BY: Jesse Ross

WHAT WOULD THE PROPOSAL DO? This proposal would change the bag limit for residents from one brown bear every four regulatory years to one brown bear every two regulatory years in all of Unit 1. As written, the bag limits for residents participating in Berners Bay hunts RB063 and RB073 would change from one bear every regulatory year to one bear every 2 regulatory years, while the nonresident bag limit would stay at one bear every regulatory year. This does not appear to be the author's intention. The remainder of Unit 1 (RB050, RB051, RB062 and RB072) would change from one bear every 4 regulatory years to one bear every 2 regulatory years for residents, and the nonresident bag limit would stay at one bear every four regulatory years.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits (1)	**Resident Open Season (Subsistence and General Hunts)**	**Nonresident Open Season**
Unit 1(C) Berners Bay drainages	Sept. 15 - Dec. 31 (General hunt only)	Sept. 15 - Dec. 31
	Mar. 15 - May 31 (General hunt only)	Mar. 15 - May 31
1 bear every regulatory year by registration permit only		
	Sept. 15 - Dec. 31 (General hunt only)	Sept. 15 - Dec. 31
Remainder of Unit 1	Mar. 15 - May 31 (General hunt only)	Mar. 15 - May 31
1 bear every 4 regulatory years by registration permit only		

There is a positive C&T finding for brown bears in all of Unit 1, outside of the Ketchikan and Juneau nonsubsistence areas, with various ANSs.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? In Unit 1 (except Berners Bay and associated drainages) the brown bear bag limit would change from one bear every four regulatory years to one bear every two regulatory years. If adopted, this proposal would lead to increased brown bear harvest which is not recommended at this time as the department is managing conservatively to increase bear numbers after a historic take of brown bears in 2020.

BACKGROUND: Brown bear hunting in Unit 1 consists of 6 registration hunts, and all are open to residents and nonresidents. RB063 and RB073 are the spring and fall hunts in the drainages of Berners Bay that currently have a bag limit of one brown bear every regulatory year. The proponent of the proposal had an oversight when writing this proposal and did not want to change these hunts to one brown bear every two regulatory years but would prefer to have a bag limit of one bear every regulatory year in this area. The other registration hunts (RB050, RB051, RB062, and RB072) all have a bag limit of harvest of one bear every four regulatory years and are the intended focus of this proposal.

Brown bear harvest in Unit 1 (and the subunits) has been relatively flat (22 to 31 animals) over the last 10 years (Figure 4-1), except in 2020 when a larger number of local hunters participated in the brown bear hunt in Southeast Alaska leading to a substantial increase in harvest (49 animals) that year. Over the last 20 years (RY02–21), 575 hunters harvested bears, 18 have harvested 2 bears, and 2 hunters have harvested 3 bears.

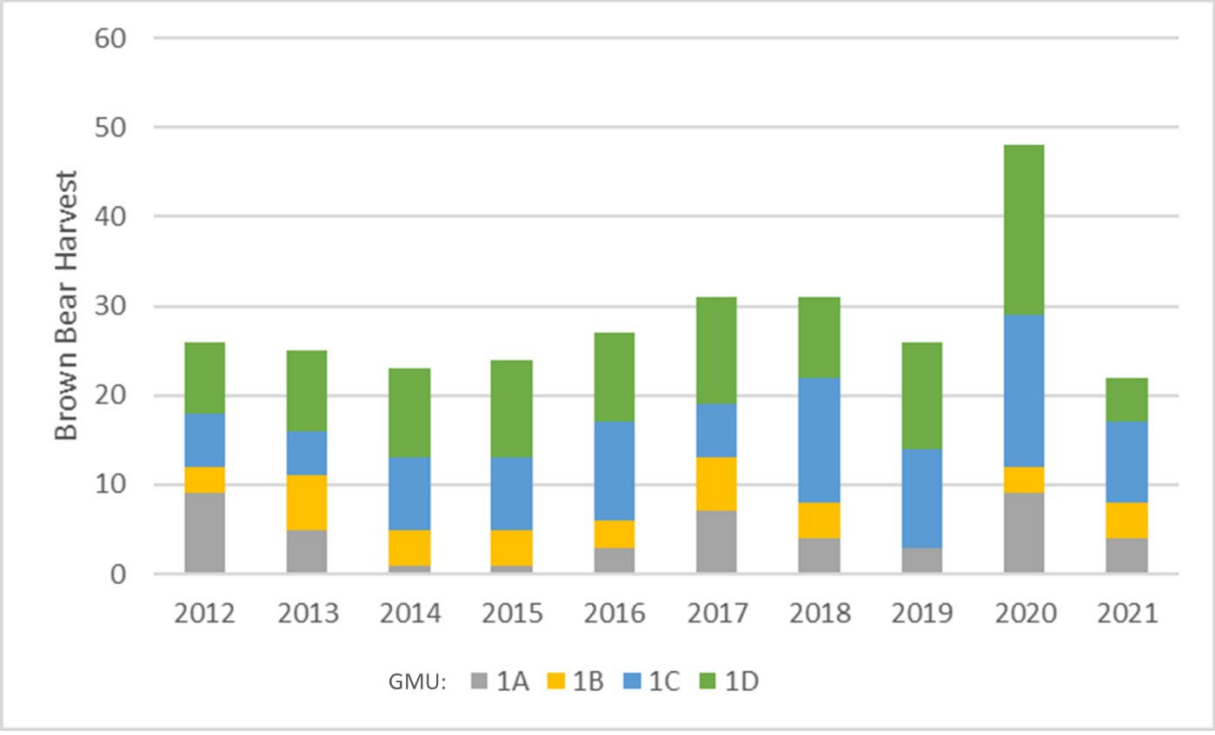

Figure 4-1. Brown bear harvest by regulatory year and game management unit for the past 10 years (RY12–21) in Game Management Unit 1, Southeast Alaska.

Overall, the brown bear population in Unit 1 is thought to be stable (however, see discussion on subunit 1D below), but lower than the islands of Unit 4. Unlike other mainland populations, like Unit 13 used as an example in this proposal, the population dynamics of coastal brown bears on the mainland in Southeast Alaska are more like island populations because they are cut off from other mainland populations by high mountain ranges and extensive glaciers and fjords. For

example, genetic data from subunit 1D indicated that brown bear movement in and out of the Chilkat Valley was very low. The bag limit of one bear every four regulatory years has been in effect since 1968. The current system is providing bears for a variety of user groups and offering a good opportunity for hunters to successfully harvest a bear.

The proponent suggested there are not any scientific data suggesting the department has population concerns in Unit 1. This is not true, given the death of 50 bears in subunit 1D in 2020. The department has gone to great lengths documenting the impacts of losing so many bears in one year and what is needed to recover this population to allow future hunting opportunity in subunit 1D. In the past, subunit 1D has supported 29-55% of the harvest within Unit 1, and has an ANS of 3-5 brown bears. Changing the brown bear bag limit of one bear every two years in subunit 1D would negatively impact the conservation plan to restore a regular spring and fall hunting season in this area. The department currently allows the harvest of 5 bears and no more than 2 females to recover this brown bear population, and managers plan to establish harvest guidelines based on population estimates currently being generated by department research biologists. If this proposal is adopted, annual harvest would be too high in subunit 1D and require an annual closure by E.O., which makes it difficult for hunters to plan for later season hunts, which some desire, and may make it difficult to achieve the ANS. The proponent is correct that there are areas where anecdotal reports indicate the brown bear population is increasing, including the Chilkat Peninsula, Tracy and Endicott Arms, and Port Houghton; however, brown bear harvest throughout Unit 1 has remained stable over the last 10 years except for 2020 (Figure 4-1).

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal due to the negative impacts it could have on the Unit 1 brown bear population and the impacts of emergency order season closures on resident and nonresident hunters. In Unit 1D this could have a significant impact on the brown bear conservation plan to bring back brown bear hunting to pre-2020 levels. After recovery, annual E.O.s would be necessary to limit harvest, which may impact guides as they try to set up hunts for later in the brown bear season. The current harvest rate appears to be working to rebuild the populations at a rate that will allow for a sustainable harvest of this population.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 5 – 5 AAC 85.065(a)(4). Hunting seasons and bag limits for small game. Change the waterfowl season in Units 1-4 by creating a split season.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? The proposal would replace the current regulation of odd-even numbered year season dates for migratory game birds in Units 1-4 with a two-segment

split season structure: hunt season open on September 1 – closed for 2 or more weeks – then reopening until the end of 107 days total season length.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.065(a)(4) Migratory game birds (except by falconry)

(A) Ducks (except sea ducks) (B) Sea Ducks (except Spectacled and Stellar's eiders) (C) Geese, Canada and cackling combined (D) Geese, White-fronted (E) Geese, Light (Snow and Ross') (F) Brant … (H) Cranes (I) Snipe

Units and Bag Limits	**Resident Open Season** (General Hunt Only)	**Nonresident Open Season**
Units 1 - 4		
	Sept. 1 — Dec. 16 (Odd years only) Sept. 16 — Dec. 31 (Even years only)	Sept. 1 — Dec. 16 (Odd years only) Sept. 16 — Dec. 31 (Even years only)

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

Migratory game bird hunting season dates would be consistent through time rather than varying annually, providing a more predictable opportunity.

BACKGROUND: Migratory game bird regulations in Alaska are delineated by five hunt zones: Southeast, Gulf Coast, Kodiak, Northern, and Aleutians. The federal framework for migratory game bird hunting limits the season to a maximum of 107 days and specifies that uniform start and end dates must apply throughout a specific hunt zone. Additionally, federal regulations restrict the range of season options that can be implemented within a hunt zone. Alaska is allowed a single split season (open-closed-open), which until recently was only assigned to the Kodiak Hunt Zone (Unit 8), although this option has not been implemented in the last 40 years. At the request of the department, the federal framework was modified in 2021 to reassign Alaska's single split-season option from the Kodiak Hunt Zone to the Southeast Hunt Zone (Units 1-4).

In past regulatory cycles, the Board of Game (board) has addressed a number of proposals that sought to adjust the dates of the migratory game bird hunting season in Units 1-4; proposals reflected hunter preference for either an early season to facilitate targeting September migrants (e.g., wigeon, pintail, teal) or a later season to target wintering waterfowl (e.g., resident mallards and sea ducks).

In 2008, the department conducted a survey of resident waterfowl hunters in the Southeast Region to better understand preferences for season dates. The results showed a preference for an earlier season in the northern part of the region and a later season in the southern part of the region. The overall weighted preference was for a Sept. 16 start date (41%). Thirty-five percent preferred a Sept. 1 start date and 24% preferred an Oct. 8 start date. Only 25% percent of respondents expressed interest in a split season. At the November 2008 meeting the board addressed a proposal (#47) to shift the season dates to start in early October and end in January. The board chose at that time to adjust the season dates by two weeks (From Sept. 1 – Dec. 16 to Sept. 16 – Dec. 31) as a compromise to best address the desires of most waterfowl hunters.

However, hunter dissatisfaction with season dates continued, as shown by proposals to readjust migratory game bird season dates submitted during subsequent regulatory cycles. At the Southeast Region meeting in 2019, the board adopted an amended proposal to set the season dates to September 16 – December 31 in even numbered years and September 1– December 16 in odd numbered years. Additionally, the board encouraged the department to continue working through the federal process to provide the board more flexibility (e.g., a split-season option) to address migratory game bird management issues in the Southeast Region.

In the fall of 2019, the department conducted a survey of resident waterfowl hunters in the Southeast Region to gauge interest in transferring the state's single split-season option from the Kodiak Hunt Zone to the Southeast zone. The online survey was sent to 347 individuals residing in the Southeast zone. Response rate was low (15.3%). The results indicated that approximately 68% of respondents (36/53) supported transferring the split-season option to the Southeast zone. When given the opportunity to select preferred season dates, the majority of respondents (30/52) indicated a preference for a split-season over retaining the current odd-even year dates, though there was no clear consensus regarding exact date preferences.

This current regulation of odd-even numbered year season dates creates a regulatory burden in the Southeast Hunt Zone that adds complexity for hunters, enforcement, and the regulations publication process. In addition, the current regulation reduces early or late season hunting opportunity, depending on the year.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal. The department recommends implementing a split-season in Units 1 – 4 to hunt migratory game birds. The benefit of this regulation change is establishing a consistent set of interannual season dates; thereby reducing regulatory complexity, while allowing in-season early and late hunting opportunity to better satisfy hunting season alignment with species-specific abundance.

The department is soliciting split season input from Advisory Committees and will provide this information during proposal deliberations.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

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PROPOSAL 6 – 5 AAC 84.270(9). Furbearer trapping.

PROPOSED BY: Nicholas Orr

WHAT WOULD THE PROPOSAL DO? This proposal would extend and align the river otter trapping season in Units 1–5 to November 10–March 31.

WHAT ARE THE CURRENT REGULATIONS?

River Otter

Unit	Season	Bag Limit
Unit 1–4	Dec 1–Feb 15	No limit.
Unit 5	Nov 10–Feb 15	No limit.

River otters are a CITES species and all hides are required to be sealed.

There is a positive C&T finding for river otters in all of Units 1-5, outside of the nonsubsistence areas, with an ANS of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would align the river otter seasons in Units 1–5 and increase the season in Units 1-4 by 64 days and Unit 5 by 44 days. River otters give birth from late January to June, and pups are weaned at 5 months old. The trapping season expansion would increase the overlap with the period in which females are providing for pups and would likely increase the annual river otter harvest and mortality.

BACKGROUND: The river otter trapping season for Units 1-5 has remained the same since 1983. Over the last ten trapping seasons an average of 404 river otter have been sealed in Units 1–5, ranging from 887 in 2012 to 149 in 2021 (Figure 6-1). The greatest number of river otters sealed were trapped in Unit 2, which average 167 river otters over the last 10 seasons, followed by Unit 4 with an average of 115. While Unit 5 has the longest current river otter trapping season, an average of only 5 river otters were sealed from the unit over the last 10 trapping seasons (less than 1% of the total river otter harvest), with none being sealed over the last 3 seasons (Figure 6-2).

The number of successful river otter trappers has declined in recent years, likely due to a decrease

in fur prices. An average of 74 trappers in Units 1-5 presented river otters for sealing over the last 10 years, declining from 111 trappers in 2013 to 41 in 2021. The majority of successful river otter trappers reported trapping in Unit 1, which average 26 successful trappers over the last 10 seasons (Figure 6-3). An average of only 2 trappers reported trapping river otters in Unit 5 during the same period.

In Units 1–5 most river otter trapping effort occurs during the months of December and January, with 81% of the river otter harvest occurring during this period (Figure 6-4). River otter trapping effort is likely higher during these months because the trapping seasons for other popular furbearer species are also open during this time. Over the last 10 trapping seasons only 18% of the reported river otter harvest occurred during the month of February.

The department does not have abundance estimates of river otters in Southeast. However, trappers who responded to the Trapper Questionnaire for Region I indicated that river otters were common in the RY20 report with no change in trend from the previous year.

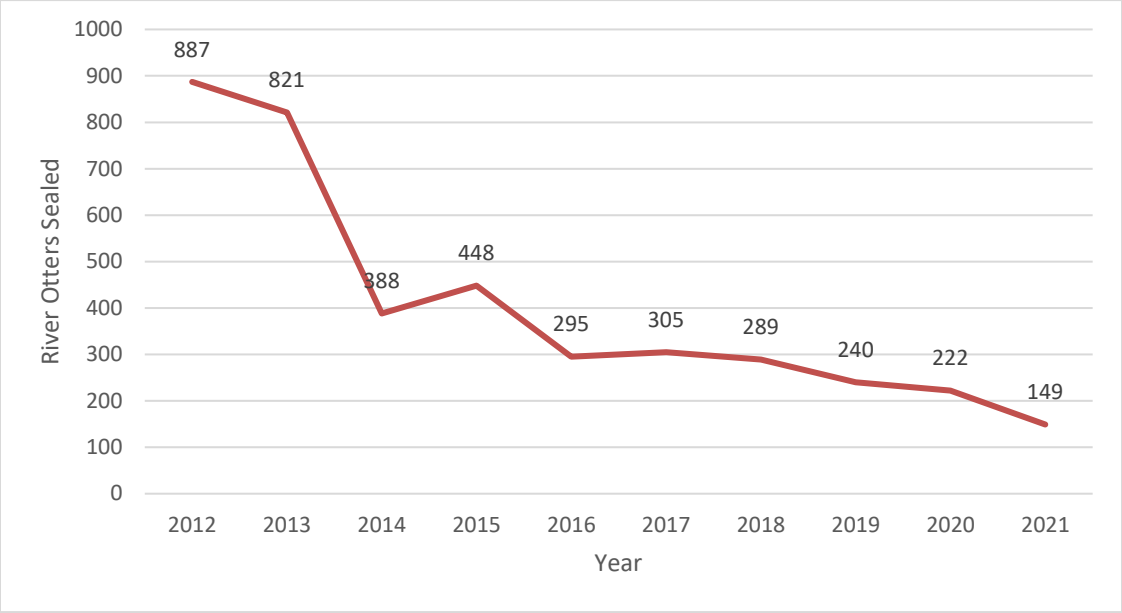

Figure 6-1. River otters sealed in units 1–5, 2012–2021.

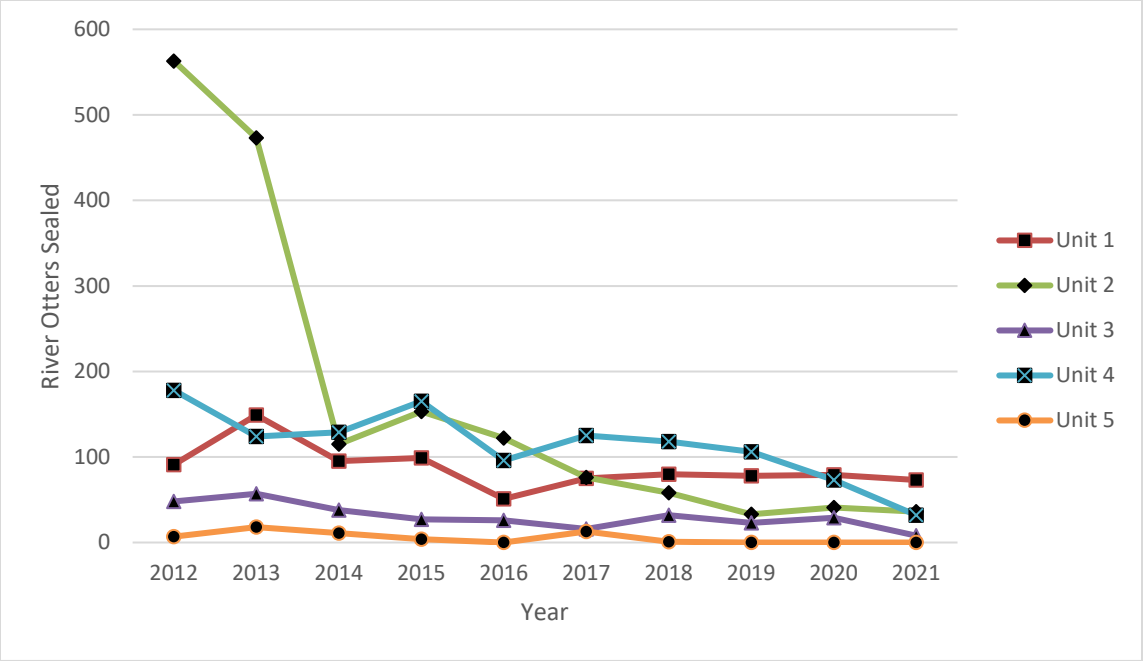

Figure 6-2. River otters sealed by unit, 2012–2021.

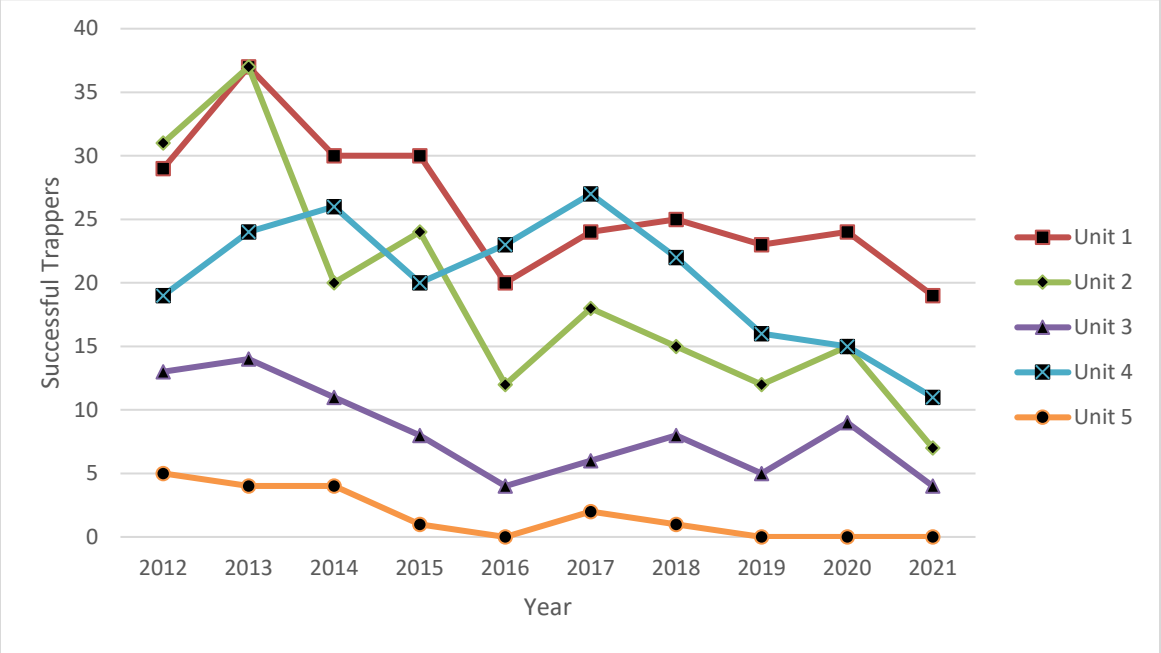

Figure 6-3. Successful river otter trappers by unit, 2012–2021.

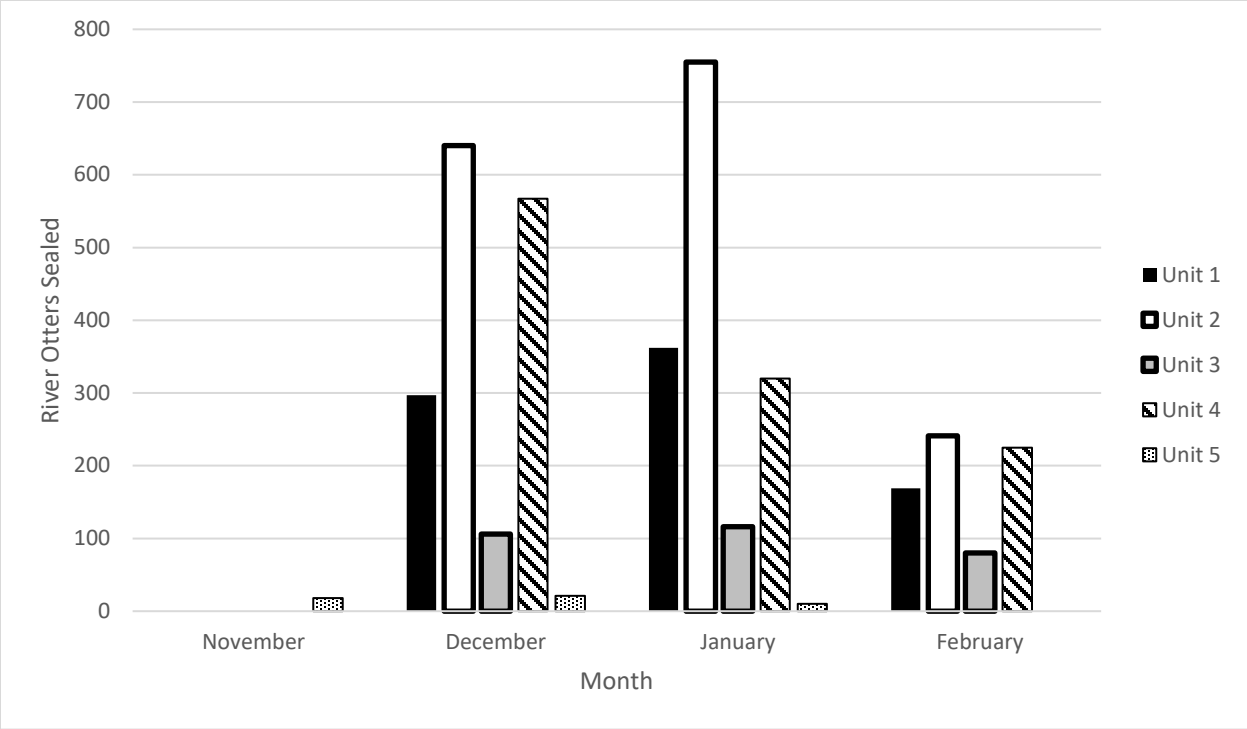

Figure 6-4. River otters sealed by month of harvest in Units 1–5, 2012–2021. Only the Unit 5 river otter trapping season is open during the month of November.

DEPARTMENT COMMENTS:

The department is **NEUTRAL** on this proposal because the proposal does not create biological concerns for the river otter populations in Units 1–5, which can be sustainably managed under the current or the proposed regulations. However, should trapper numbers increase to previous levels, there may be some local population declines. The current river otter trapping seasons in Units 1–5 have been in place since 1983 and have shown to provide adequate opportunity while also assuring sustainability of river otter populations.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 7 – 5 AAC. 84.270. Trapping seasons and bag limits for furbearers. Extend marten trapping season in Game Management Units 1–3, except Kuiu Island, 4 remainder, and 5.

PROPOSED BY: Nicholas Orr

WHAT WOULD THE PROPOSAL DO? Marten trapping season in Units 1–3 except Kuiu Island, 4 remainder, and 5 would be November 10–Last day of February.

WHAT ARE THE CURRENT REGULATIONS?

Marten

Unit	Season	Bag Limit
Unit 1–3, except Kuiu Island	December 1–February 15	No limit.
Unit 4 remainder	December 1–February 15	No limit.
Unit 5	November 10–February 15	No limit.

There is a C&T finding for marten in all of Units 1-5, outside of the nonsubsistence areas, with an ANS of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Marten season in Units 1–3 except Kuiu Island, and 4 remainder would be extended by 34 days, and the season extended by 13 days for Unit 5. Adoption of this proposal is likely to increase marten harvest.

BACKGROUND: Marten seasons have fluctuated across Southeast Alaska through time. In 1975, the Unit 1C season was November 10–February 15; the remainder of Units 1 and 2, 3, and 4 were December 1–February 15; and Unit 5 was November 10–January 31. Currently, regulations are aligned in Southeast except for Unit 4 Chichagof Island east of Idaho Inlet and north of Trail River and Tenakee Inlet and north of a line from the headwaters of Trail River to the head of Tenakee inlet (December 1–December 31), and Unit 5 (November 10–February 15). Marten season in the portion of Unit 4 near Tenakee Springs changed to a reduced season in 1992 and the season expansion in Unit 5 occurred in 1977.

Trapping effort in February is minimal compared to December and January in Units 1–4 (Figure 7-1). Most marten harvest (87%-97%) occurs in December and January in Units 1–4. Trappers put in the most effort while the majority of other furbearer seasons are open and effort seems to diminish towards the end of the seasons. In Unit 5, trapping success is more evenly distributed between November–January, and February only accounts for 6% of harvest (Figure 7-1).

The department does not have abundance estimates of marten in Southeast. However, trappers who responded to the Trapper Questionnaire for Region I indicated that marten were common in the RY20 report with no change in trend from the previous year. Marten abundance is linked with their main prey, small mammals. Small mammal populations cycle up and down about every 6 years in Southeast Alaska, which influences marten abundance. Marten are also widely distributed throughout Southeast providing ample trapping opportunity.

Harvest and the number of successful marten trappers has declined across Units 1–5 (Figure 7-2, Figure 7-3). This decrease in harvest and trappers may be linked to low fur prices, high gas prices, and other factors unrelated to marten abundance. Fur sealing data from beavers and river otters also show a clear downward trend along with the total number of sealing certificates across the state which coincides with decreased pelt prices between 2012 and2021. The time and effort to trap, skin, flesh, and stretch fur play a large role in determining the amount of trapping effort to commit to a species. Marten are fairly easy to prepare, but with low prices trappers may be waiting for higher prices before increasing trapping effort.

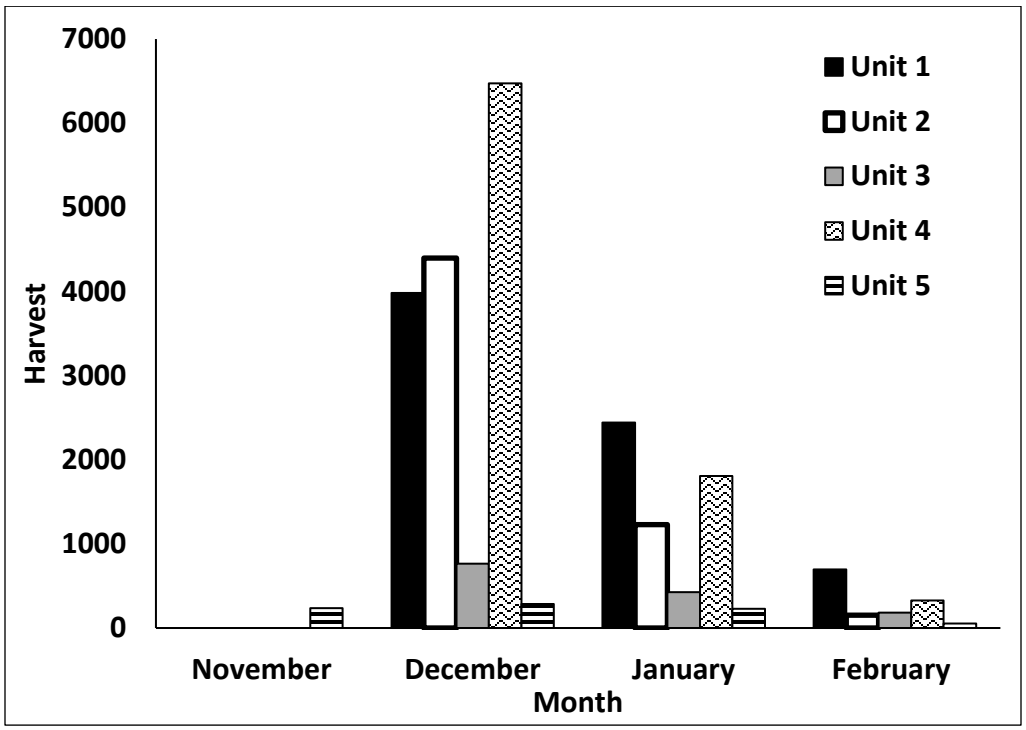

Figure 7-1. Marten harvest by month in Game Management Unit 1–5, RY12–RY21. Unit 5 is the only area marten trapping season open in November.

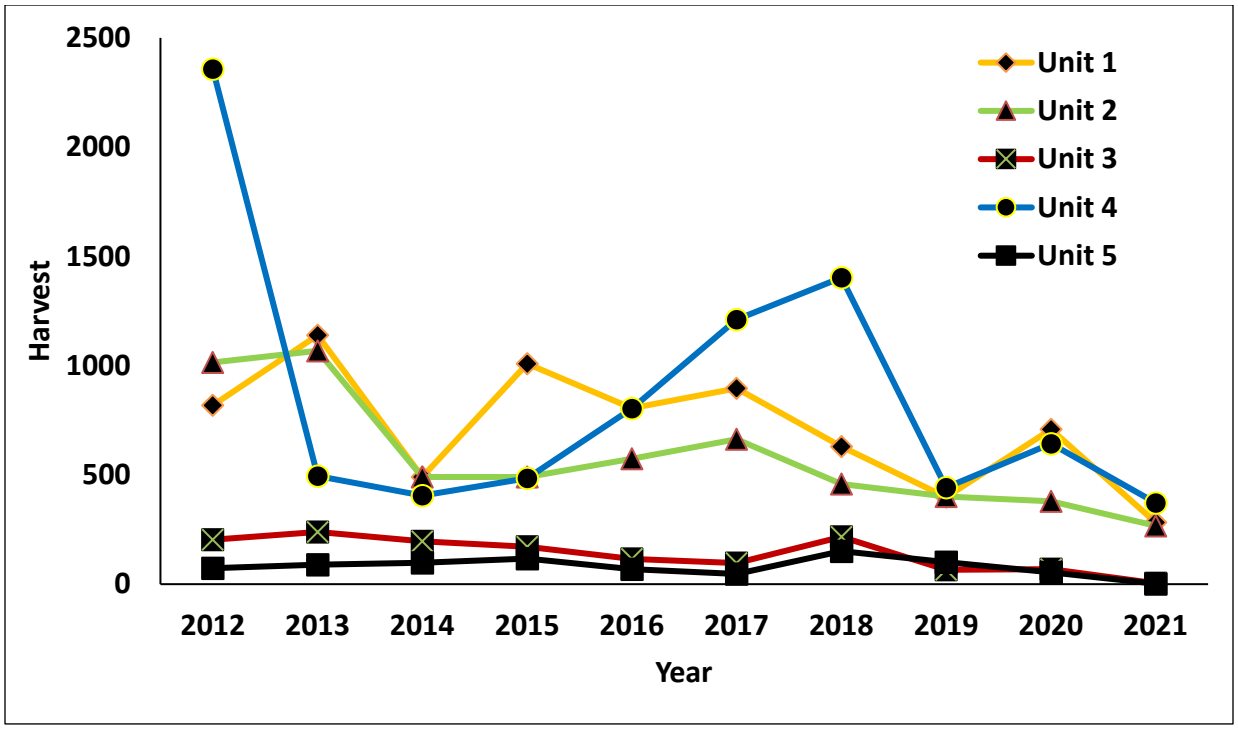

Figure 7-2. Marten harvest in Game Management Units 1–5, RY12-RY21.

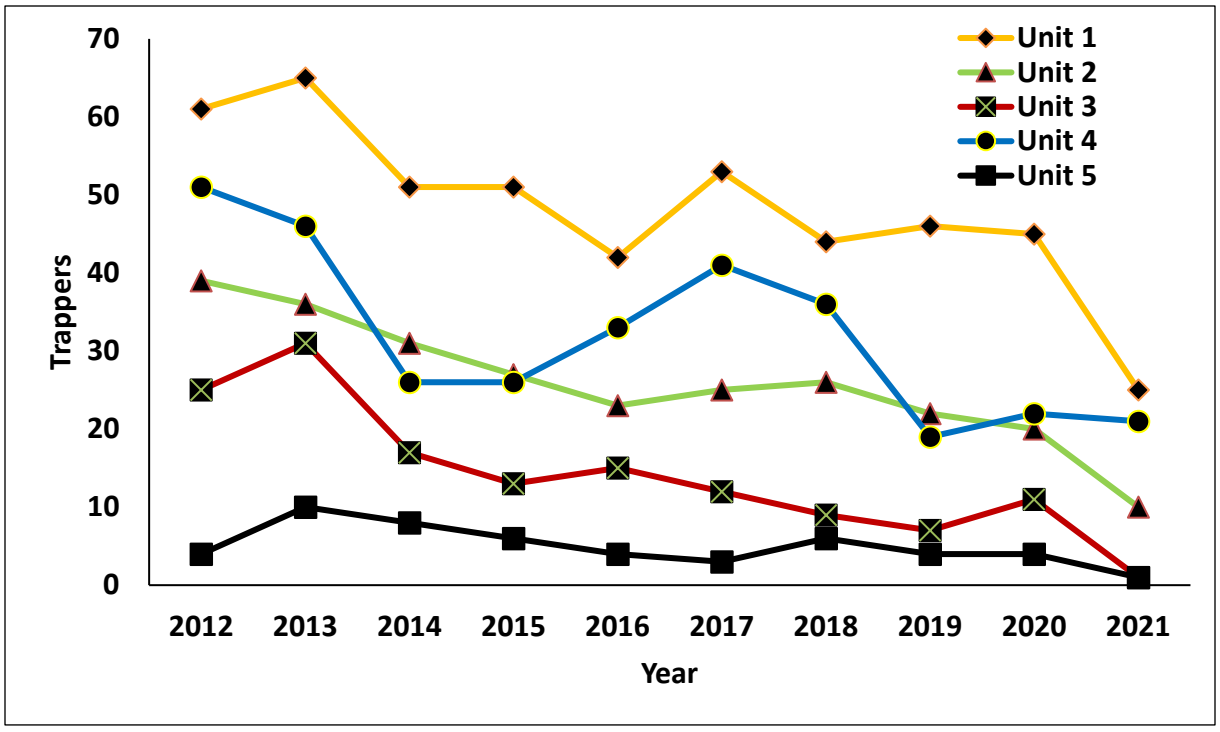

Figure 7-3. Successful marten trappers in Game Management Units 1–5, RY12-RY21.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the proposal since it is not likely to create biological concern. However, the current marten trapping season coincides with

several other furbearer species for Units 1–4 which are open from December 1–February 15, except Unit 5 which starts November 10. The December 1–February 15 trapping seasons were adopted in part from information gathered from trappers regarding the quality of hides during the season. Trapper questionnaires and sealing data collected from other furbearer species indicate little trapper effort occurs during the last month of the existing season. Because of the chance of incidental catches across species, along with concerns for the enforceability of trapping regulations, the department recommends consistent trapping seasons among species to simplify the regulations. The proponent asks for the marten season to be aligned with the wolverine season, which in codified regulation ends the "last day of February"; if adopted, the department recommends a season end on the last day of February.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 8– 5 AAC 84.270. Trapping seasons and bag limits for furbearers. Extend marten trapping season in Game Management Units 1 and 2.

PROPOSED BY: Ketchikan Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO?

If adopted, the proposal would change the marten trapping season in Game Management Units 1 and 2 to December 1–February 28.

WHAT ARE THE CURRENT REGULATIONS?

Marten

Unit	Season	Bag Limit
Unit 1–3, except Kuiu Island	December 1–February 15	No limit.

There is a positive C&T finding for marten in all of Units 1-5, outside of the nonsubsistence areas, with an ANS of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? An additional 13 days of trapping would be added to the current marten season in GMU 1 and 2. If adopted the proposal will likely result in slight increase in marten harvest.

BACKGROUND: The marten season in Game Management Units (Unit) 1 and 2 has been from December 1–February 15 since the 1983 trapping season. This season is currently the same for fishers, red foxes, lynx, mink, weasels, muskrats, and river otters. Maintaining a similar season among furbearer species simplifies regulations and decreases the chances that non-target species

are caught out of season.

Trapping effort in February is minimal compared to December and January (Figure 8-1). Most marten harvest (90%-97%) occurs in December and January in Units 1 and 2. Trappers put in the most trapping effort for all species when most of the furbearer seasons are concurrently open.

The department does not have abundance estimates of marten in Southeast. However, trappers who responded to the Trapper Questionnaire for Region I indicated that marten were common in the RY20 report with no change in trend from the previous year. Marten abundance is linked with their main prey, small mammals. Small mammal populations cycle up and down about every 6 years in Southeast Alaska, which influences marten abundance. Marten are also widely distributed throughout Southeast providing extensive trapping opportunity.

Harvest and the number of successful marten trappers has declined in both Units 1 and 2 (Figure 8-2, Figure 8-3). This decrease in harvest and trappers may be linked to low fur prices, high gas prices, and other factors unrelated to marten abundance. Fur sealing data from beavers and river otters also show a clear downward trend along with the total number of sealing certificates across the state which coincides with decreased pelt prices between 2012 and 2021. The time and effort to trap, skin, flesh, and stretch fur play a large role in determining the amount of trapping effort to commit to a species. Marten are fairly easy to prepare, but with low prices trappers may be waiting for high prices before increasing trapping effort.

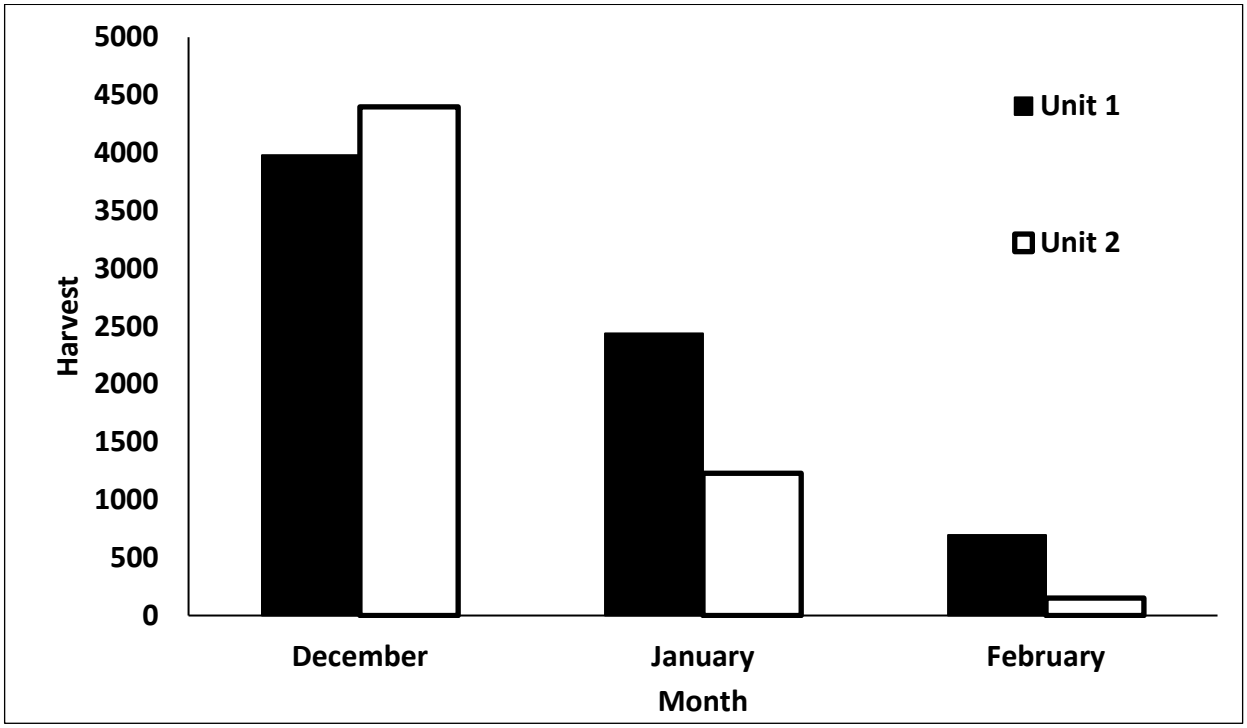

Figure 8-1. Marten harvest chronology by month in Game Management Unit 1 and 2 from RY12 – RY21.

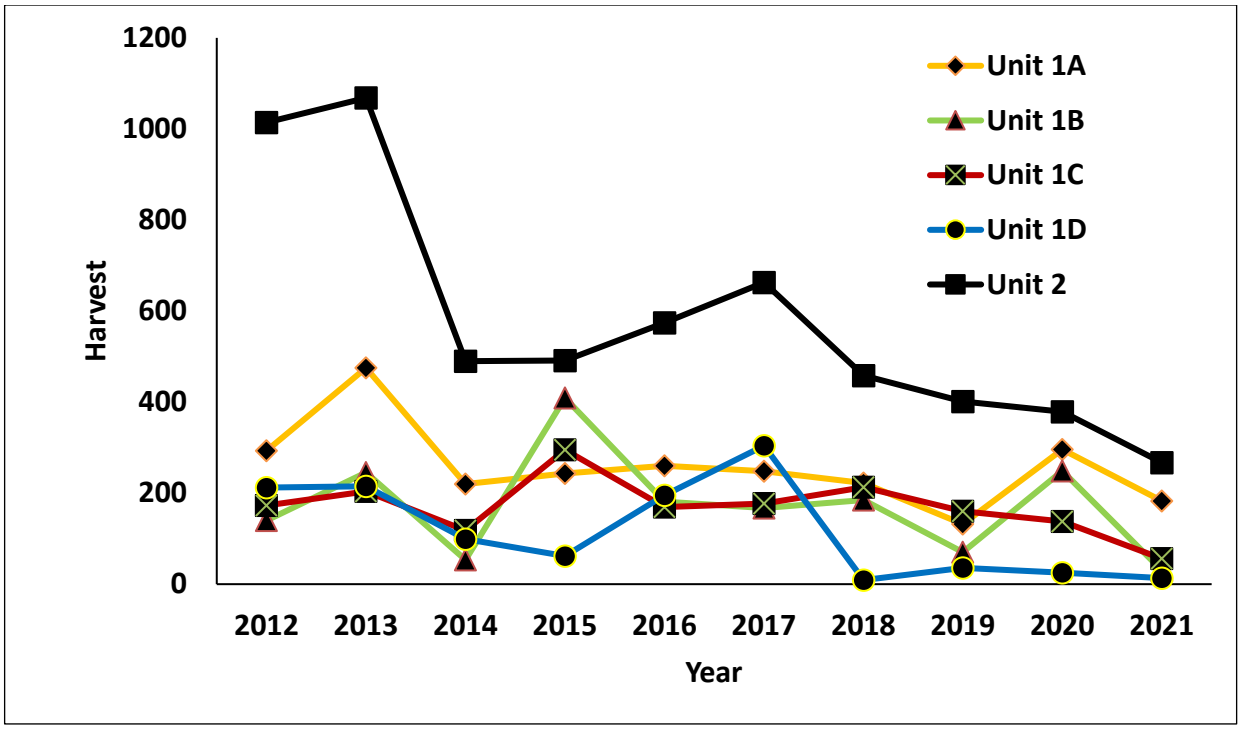

Figure 8-2. Marten harvest in Game Management Units 1 and 2, RY12-RY21.

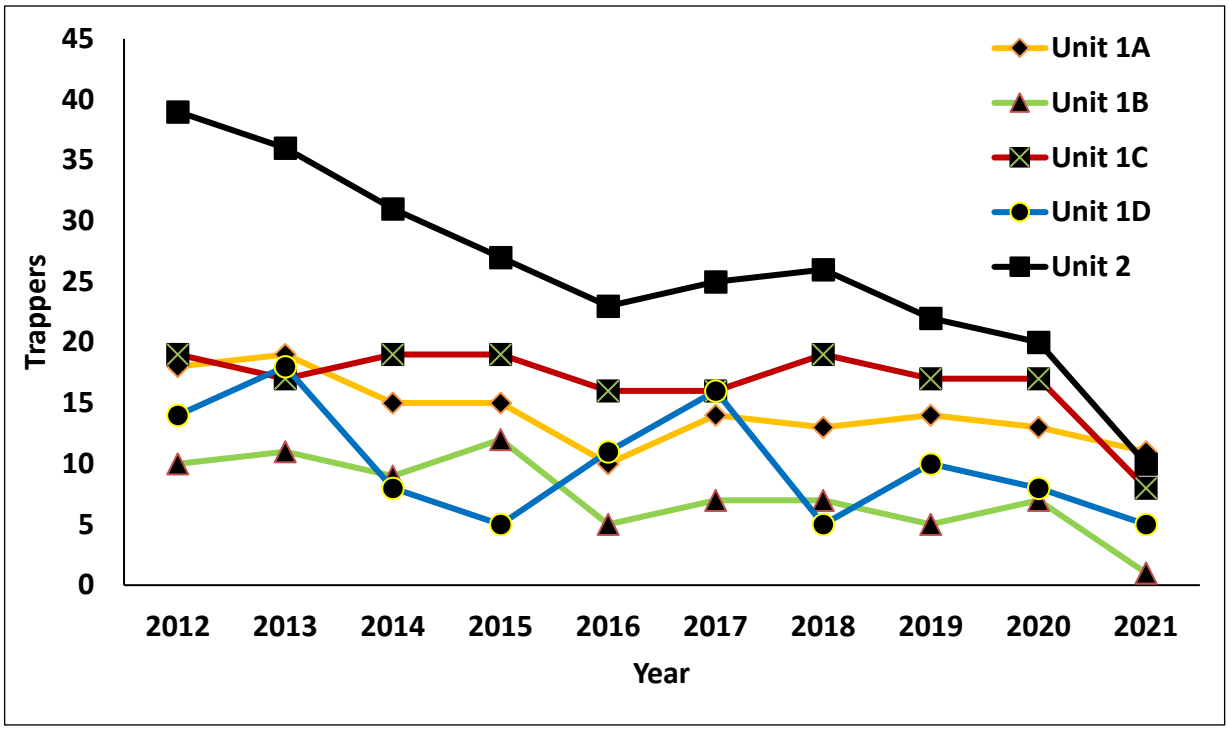

Figure 8-3. Successful marten trappers in Game Management Units 1 and 2, RY12-RY21.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the proposal since it is not likely to create biological concern. However, the current marten trapping season coincides with

several other furbearer species for Units 1 and 2 which are open from December 1–February 15. The February 15 ending date was adopted in part from information gathered from trappers regarding the quality of hides during the season. Trapper questionnaires and sealing data collected from other furbearer species indicate little trapper effort occurs during the last month of the existing season. Because of the chance of incidental catches across species, along with concerns for the enforceability of trapping regulations, the department recommends consistent trapping seasons among species to simplify the regulations. If the proposal is adopted, the department recommends amending the ending date to be "last day of February" instead of "February 28."

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 9 – 5 AAC 84.270(14) Trapping seasons and bag limits for furbearers. Extend the wolverine trapping season in Game Management Units 1–5.

PROPOSED BY: Ketchikan Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? The wolverine trapping season would be from November 10–March 15, extending the season by 16 days.

WHAT ARE THE CURRENT REGULATIONS?

Wolverine

Unit	Season	Bag Limit
Units 1–5	November 10 to the Last day of February	No limit.

There is a positive C&T finding for wolverine in all of Units 1-5, outside of the nonsubsistence areas, with an ANS of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, the increased 15 days would overlap with the wolverine denning season.

BACKGROUND: The wolverine trapping season was changed in Game Management Units 1-5 during the 2008 board meeting from November 10 – April 30 to November 10 – February 15. This shorter season was recommended because of new information that indicated that higher sustainable harvests of wolverines could be achieved by avoiding the denning period (15 February to 15 March). During the 2015 board meeting the season was extended to the last day of February. The original proposal called for extending the season to April 30, but the department expressed biological concern with harvesting denning female wolverine.

Wolverines exist at low densities in Alaska and are considered scarce in Region I. Wolverine densities in Southeast are moderate at 9.7/1000km^2 compared to densities across their entire distribution, which ranges from 0.3–21/1000km^2. Wolverines prefer taiga and boreal regions; however, they are found on some islands in Region I and the adjacent mainland. Prime mainland habitat is typically lower elevations near river mouths. Transboundary rivers (e.g., Unuk River, Stikine River, Taku River) provide corridors from southeast Alaska to Canada. In the 2020 Alaska Trapper report, Region I trappers indicated that wolverines were not among their top 5 most important species. It is likely that wolverine harvest is limited by wolverine abundance, access, and trapper interest.

A key component of viable wolverine populations is the survival of reproductive females. Female wolverine do not produce young until at least three years of age and frequently only successfully raise one or two young every other year due to reproductive pauses. To maintain sustainable populations, as well as provide for an optimal number of surplus animals for the longer term, the harvest of females with dependent young should be minimized. Wolverine kits are born in February and early March and remain in the den until late May. During this late winter period reproducing females are vulnerable to trapping because they travel extensively to obtain food while attempting to meet the energetic demands of lactation. Harvest of females occurs throughout the trapping season in Units 1–5 (Figure 9-1, Figure 9-2). Extending the season further into the denning period may reduce reproductive females that are provisioning kits in their dens. Harvesting reproductive female wolverines during this period can have negative ramifications on future recruitment into the population.

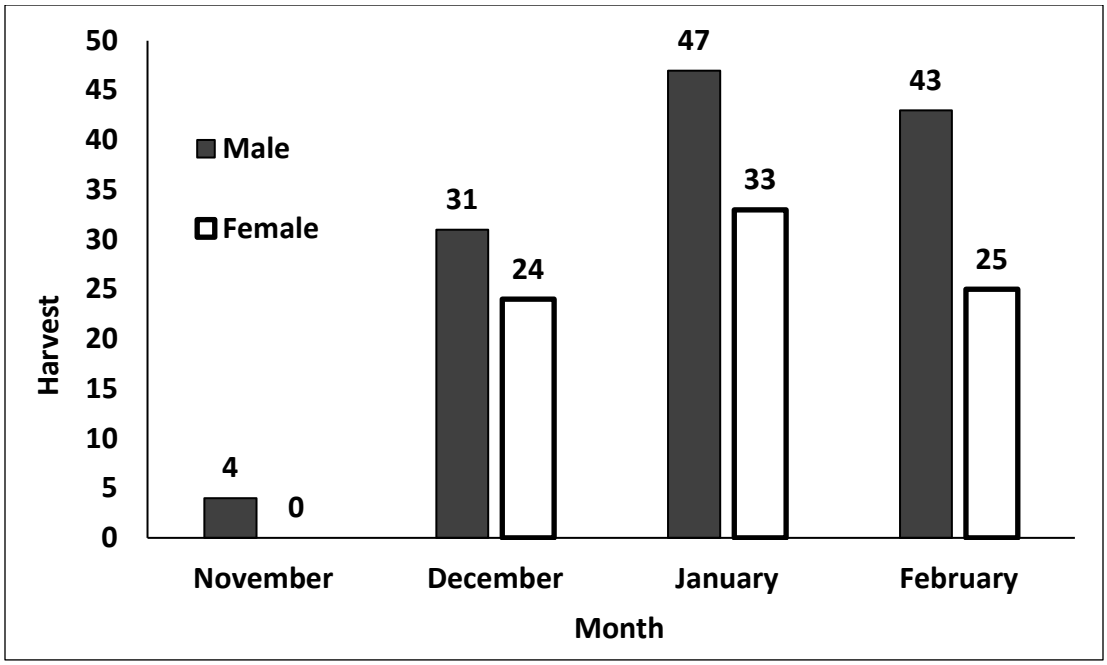

Figure 9-1. Wolverine harvest by sex in Game Management Units 1–5, RY12-RY21.

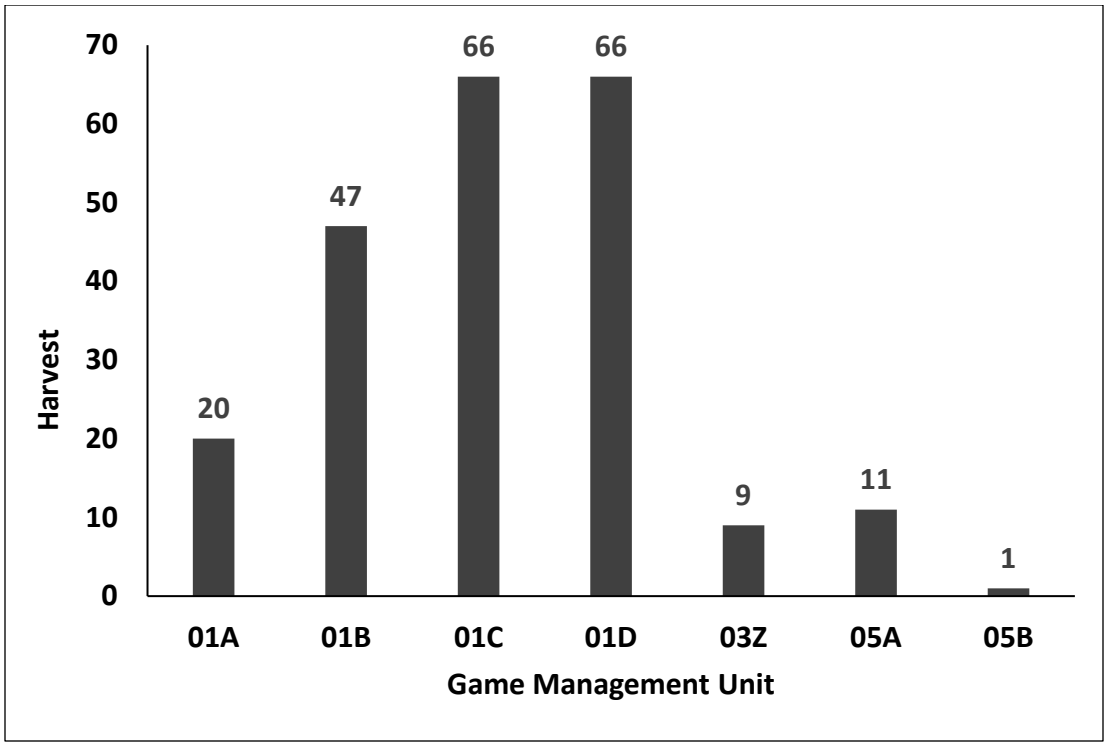

Figure 9-2. Wolverine harvest in Game Management Units 1-5, RY12-RY21.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. Closing the wolverine trapping season in February is intended to provide long-term sustainable wolverine hunting and trapping opportunities. The current wolverine season is misaligned with most other furbearer seasons which end on February 15.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

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PROPOSAL 10 – 5 AAC: 85.030. Hunting Seasons and bag limits for deer. Decrease the bag limit for deer in Unit 4 as follows:

Decrease bag limit for Unit 4 Remainder (outside the area of Chichagof Island east of Port Frederick and north of Tenakee Inlet including all drainages in Tenakee Inlet) from six to four deer.

PROPOSED BY: Kevin Maier

WHAT WOULD THE PROPOSAL DO? This proposal would decrease the state bag limit in the Remainder of Unit 4 (outside the area of Chichagof Island east of Port Frederick and north of Tenakee Inlet including all drainages in Tenakee Inlet) from six to four deer.

WHAT ARE THE CURRENT REGULATIONS?

Unit 4 Remainder

Residents and nonresidents	Hunts	Dates
Six deer total	Bucks only	Aug. 1 – Sept. 14
	Any deer	Sept. 15 – Dec. 31

The IM population objective for Unit 4 is 125,000 deer and the harvest objective is 7,800.

There is a positive C&T finding for deer in Unit 4 and an ANS of 5,200 – 6,000 deer, outside the Juneau Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

This proposal would mainly affect non-federally qualified hunters since the current bag limit for federally qualified hunters is six deer and the majority of land in Unit 4 is federal; nonresident deer harvest is relatively low in the proposed area. Juneau and Ketchikan are the only communities in Southeast Alaska where hunters are not federally qualified. There would be loss of deer harvest opportunity for this user group, as well as a reduction in subsistence opportunity for other Alaskans.

BACKGROUND: At their January 2019 meeting, the board raised the Unit 4 bag limit from four to six deer. Prior to this decision the Unit 4 bag limit had been four deer since prior to statehood. Unit 4 currently has the highest bag limit in the state. Unit 6 (Prince William Sound) has a five deer bag limit.

Under Federal subsistence regulations, rural residents of Units 1 – 5 are qualified to hunt deer on federal lands within Unit 4. The majority of Unit 4 (~90%) is Tongass National Forest. The Federal Subsistence Board creates regulations that apply only on federal lands to ensure a meaningful preference for subsistence for federally-qualified users on those lands, usually through more liberal season dates and bag limits. Currently federally qualified subsistence hunters in Southeast Alaska are allowed six deer, an additional month of hunting opportunity in January, and a designated hunter program. Unit 4 has very little nonresident hunter participation (approximately 2.5% of annual harvest).

During the three seasons (RY2019 – RY2021) with a six deer bag limit, the average annual harvest in GMU 4 was 5,855 deer. During this period an average of 30 non-federally qualified hunters reported taking five deer and 29 non-federally qualified hunters reported taking six deer (Figure 10-1). This translates to approximately 88 additional deer taken annually under the more liberal six deer bag limit. A decreased bag limit would mainly affect Juneau based hunters. Juneau hunters accounted for 80% of the increased harvest during this three-year period

Unit 4 deer populations can be sustainably managed under either a four or six deer bag limit. From RY2019 – RY2021, 97% of non-federally qualified hunters took four deer or fewer suggesting that a four deer bag limit is adequate to meet the demands of most hunters. Conversely, under the six deer bag limit harvests only increased 1.5%, indicating that a 6 deer bag limit provides a fully sustainable increased opportunity.

Deer populations throughout Unit 4 are at high and stable levels. Harvest levels are the highest in the state, consistently between 5,000 and 7,000 deer annually. Unit 4 also has the lowest days of hunting effort per deer of anywhere in the state. Pellet surveys, aerial alpine surveys, spring body condition surveys, and spring beach mortality surveys all indicate that Unit 4 has high densities of deer. Unit 4 has largely intact old growth forest habitat and does not have wolves or black bears which are the main predators of deer in Alaska. Winter severity is the limiting factor for deer in Unit 4. Population indices and measures of hunter effort and success indicate that Unit 4 has the highest population of deer and highest hunting success of anywhere in in the state.

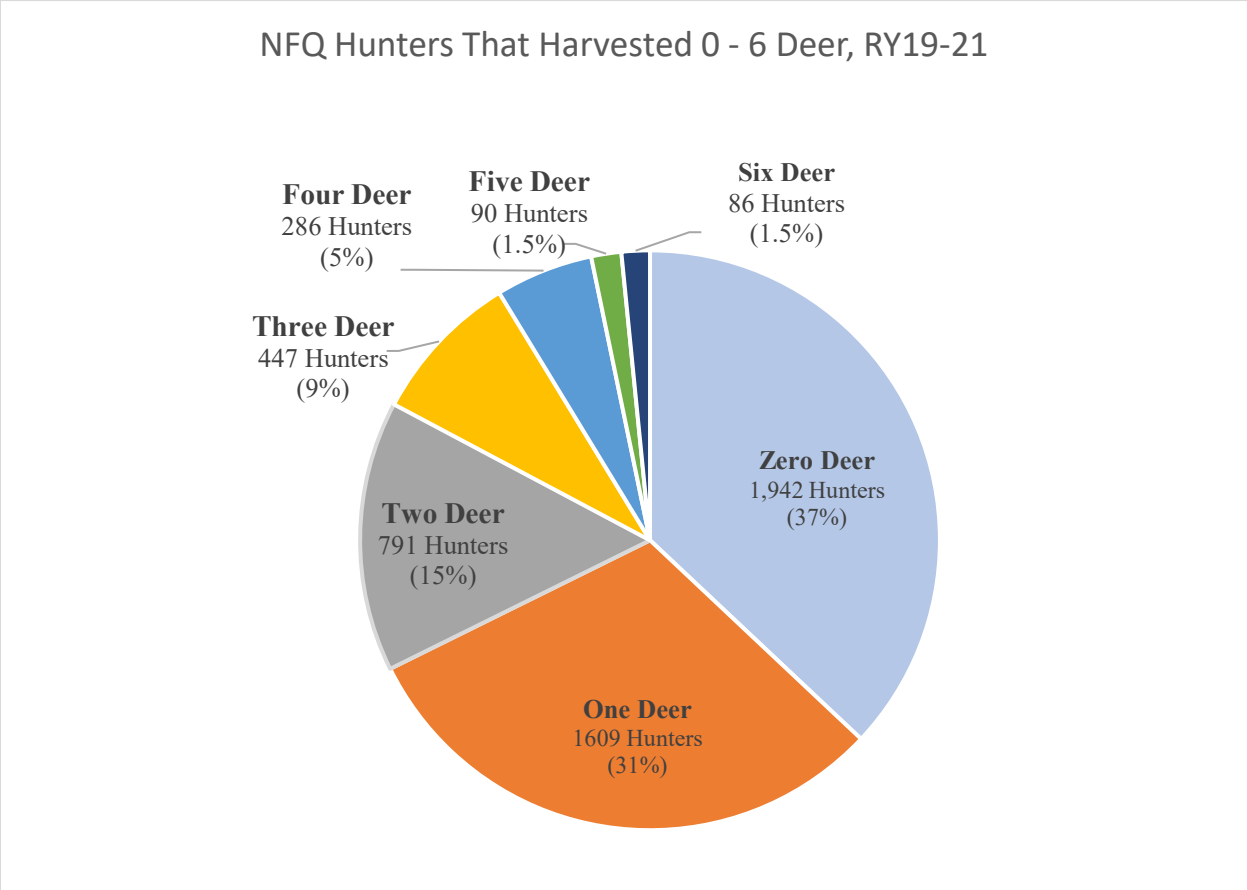

Figure 10-1. Non-federally qualified deer hunters who harvested 0, 1, 2, 3, 4, 5 or 6 deer, RY19-21.

Deer populations in Unit 4 are currently robust after a decade of mild to moderate winters A bag limit change would have no impact on the overall population.

DEPARTMENT COMMENTS: The department is **Opposed** to this proposal since there is no biological concern and deer populations can be sustainably managed under the current or proposed regulations. The Department supports providing opportunities to hunt when harvestable surpluses exist. This provides for food security and generational passage of hunting traditions. If adopted, the board should consider whether adoption of this proposal would continue to provide a normally diligent participant a reasonable opportunity for success in harvesting deer for subsistence uses.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

****

PROPOSAL 11 – 5 AAC: 85.030. Hunting Seasons and bag limits for deer. Decrease the bag limit for deer in Unit 4 as follows:

Decrease the bag limit for Unit 4 Remainder (outside the area of Chichagof Island east of Port Frederick and north of Tenakee Inlet, including all drainages in Tenakee Inlet) from six to four deer.

PROPOSED BY: Paul Johnson

WHAT WOULD THE PROPOSAL DO? This proposal would decrease the state bag limit in the Remainder of Unit 4 (outside the area of Chichagof Island east of Port Frederick and north of Tenakee Inlet, including all drainages in Tenakee Inlet) from six to four deer.

WHAT ARE THE CURRENT REGULATIONS?

Unit 4 Remainder

Residents and nonresidents	Hunts	Dates
Six deer total	Bucks only	Aug. 1 – Sept. 14
	Any deer	Sept. 15 – Dec. 31

The IM population objective for Unit 4 is 125,000 deer and the harvest objective is 7,800.

There is a positive C&T finding for deer in Unit 4 and an ANS of 5,200 – 6,000 deer, outside of the Juneau Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

This proposal would mainly affect non-federally qualified hunters since the current bag limit for federally qualified hunters is six deer and the majority of land in Unit 4 is federal; nonresident deer harvest is relatively low in the proposed area. Juneau and Ketchikan are the only communities in Southeast Alaska where hunters are not federally qualified. There would be loss of deer harvest opportunity for this user group, as well as a reduction in subsistence opportunity for other Alaskans.

BACKGROUND: At their January 2019 meeting, the board raised the Unit 4 bag limit from four to six deer. Prior to this decision the Unit 4 bag limit had been four deer since prior to statehood. Unit 4 currently has the highest bag limit in the state. Unit 6 (Prince William Sound) has a five deer bag limit.

The author of this proposal suggests that reducing the bag limit may help deter current Federal Subsistence Board proposals aimed at closing large areas of Unit 4 to non-federally qualified hunters and argues that a four deer bag limit was sustainable, provided successful hunts, and provided an adequate amount of meat for decades.

Under Federal subsistence regulations, rural residents of Units 1 – 5 are qualified to hunt deer on federal lands within Unit 4. The majority of Unit 4 (~90%) is Tongass National Forest. The Federal Subsistence Board creates regulations that apply only on federal lands to ensure a meaningful preference for subsistence for federal-qualified users on those lands, usually through more liberal season dates and bag limits. Currently federally qualified subsistence hunters in Southeast Alaska are allowed six deer, an additional month of hunting opportunity in January, and a designated hunter program. Unit 4 has very little nonresident hunter participation (approximately 2.5% of annual harvest).

During the three seasons (RY2019 – RY2021) with a six deer bag limit, the average annual harvest in GMU 4 was 5,855 deer. During this period an average of 30 non-federally qualified hunters reported taking five deer and 29 non-federally qualified hunters reported taking six deer (Figure 11-1). This translates to approximately 88 additional deer taken annually under the more liberal six deer bag limit. A decreased bag limit would mainly affect Juneau based hunters. Juneau hunters accounted for 80% of the increased harvest during this three-year period

Unit 4 deer populations can be sustainably managed under either a four or six deer bag limit. From RY2019 – RY2021, 97% of non-federally qualified hunters took four deer or fewer suggesting that a four deer bag limit is adequate to meet the demands of most hunters. Conversely, under the six deer bag limit harvests only increased 1.5%, indicating that a 6 deer bag limit provides a fully sustainable increased opportunity.

Deer populations throughout Unit 4 are at high and stable levels. Harvest levels are the highest in the state, consistently between 5,000 and 7,000 deer annually. Unit 4 also has the lowest days of hunting effort per deer of anywhere in the state. Pellet surveys, aerial alpine surveys, spring body condition surveys, and spring beach mortality surveys all indicate that Unit 4 has high densities of deer. Unit 4 has largely intact old growth forest habitat and does not have wolves or black bears which are the main predators of deer in Alaska. Winter severity is the limiting factor for deer in Unit 4. Population indices and measures of hunter effort and success indicate that Unit 4 has the highest population of deer and highest hunting success of anywhere in in the state.

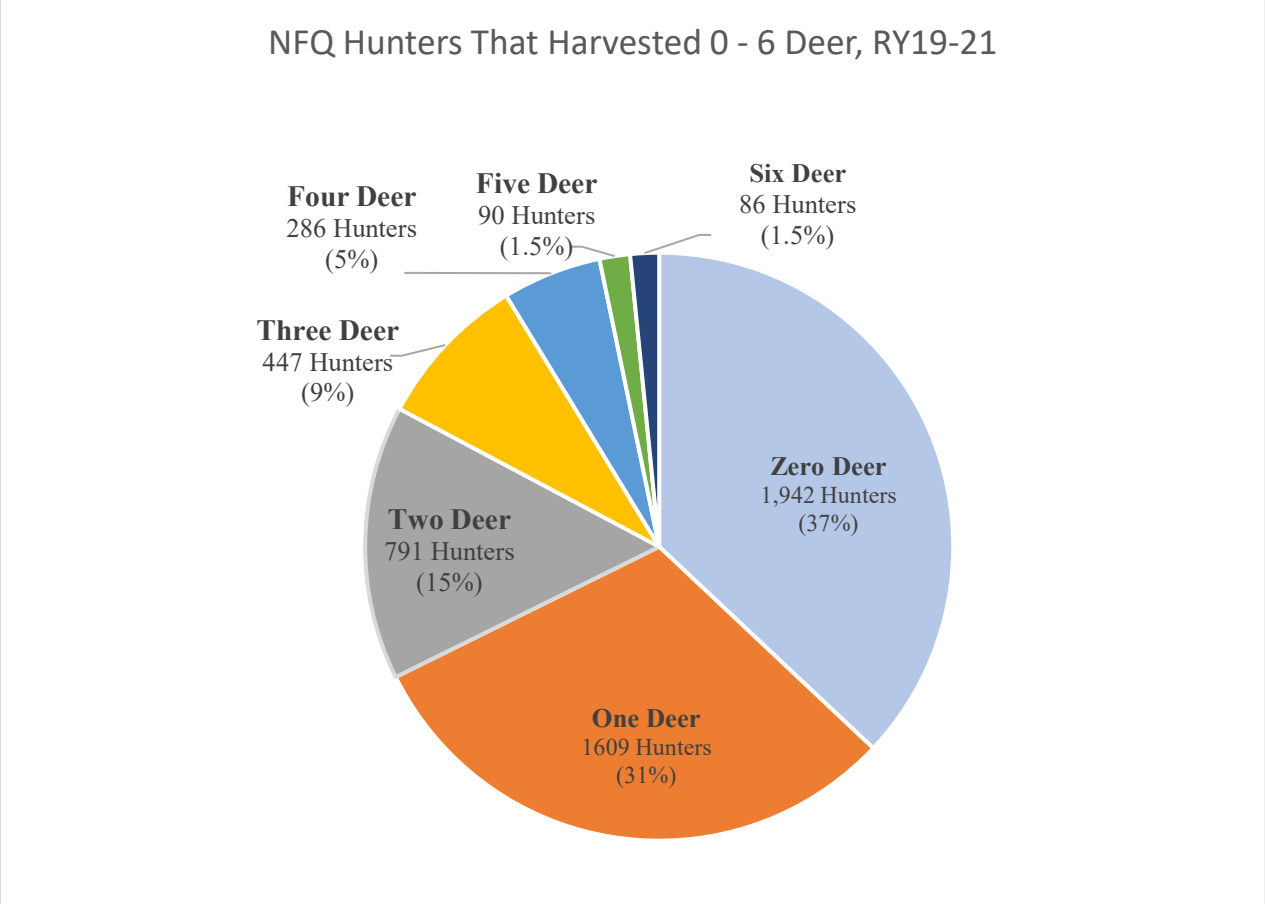

Figure 11-1. Non-federally qualified deer hunters who harvested 0, 1, 2, 3, 4, 5 or 6 deer, RY19-21.

Deer populations in Unit 4 are currently robust after a decade of mild to moderate winters and harvest likely does not exceed 5% of the total population. A bag limit change would have no impact on the overall population.

DEPARTMENT COMMENTS: The department is **OPPOSED to** this proposal since there is no biological concern and deer populations can be sustainably managed under the current or proposed regulations. The Department supports providing opportunities to hunt when harvestable surpluses

exist. This provides for food security and generational passage of hunting traditions. If adopted, the board should consider whether adoption of this proposal would continue to provide a normally diligent participant a reasonable opportunity for success in harvesting a deer for subsistence uses.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

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PROPOSAL 12 – 5 AAC: 92.510. Areas closed to hunting. Open the Mitchell Bay Closed Area (Figure 12-1) to the taking of brown bears as follows:

Open the Mitchell Bay closed area, including Kootznahoo Inlet, Kanalku Bay, Favorite Bay, and all lands within 660 feet of mean high tide within that area, to the taking of brown bears (Figure 12-1).

PROPOSED BY: Zach Decker

WHAT WOULD THE PROPOSAL DO? This proposal would open the Mitchell Bay Closed Area to the taking of brown bears during established registration and draw hunts.

WHAT ARE THE CURRENT REGULATIONS?

Unit 4 Remainder

Residents and nonresidents	Hunts	Dates
One bear every four	RB/DB089	Mar. 15 – May 20
Regulatory years	RB/DB077	Sept. 15 – Dec. 31

Mitchell Bay Closed Area: Kootznahoo Inlet, Kanalku Bay, Favorite Bay and all land within 660 feet of mean high tide within that area: closed to taking of brown bears.

Under the brown bear management strategy, Admiralty Island has a guideline mortality level of 62 brown bears (23 female) annually.

There is a positive C&T finding for brown bears in Unit 4 with an ANS of 5 – 10 bears, outside of the Juneau Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

This proposal would open brown bear hunting in Mitchell Bay, which will likely result in increased harvest for Admiralty Island. Most of brown bear harvest in Unit 4 is by guided non-resident hunters (~70%). There are currently four guide businesses with authorization to hunt in this area. In addition to increased bear harvest, adoption of this proposal may result in user conflicts since this area has been previously set aside for bear viewing opportunities.

In January 2018, the U.S. Forest Service began facilitating a collaborative process between big game hunting guides and the small cruise ship industry to reduce crowding and conflicts in the field. A best management practices agreement was finalized in March 2020. Rescinding the Mitchell Bay Closed Area could have impacts on that agreement.

BACKGROUND: Admiralty Island is managed under the Unit 4 Brown Bear Management Strategy (http://www.adfg.alaska.gov/static/research/plans/pdfs/u4rep.pdf). This is a comprehensive management plan developed in 2000 to address the needs of multiple interest groups both consumptive and non-consumptive. Under this plan, the GHL for human caused mortality is 4% of the most recent population estimate. The current GHL for Admiralty Island is 62 bears (23 female). Harvest has averaged 42 bears (36 male, 6 female) over the past decade (RY12 – RY21). The most current population estimate for Admiralty Island is 1,560 bears.

The Mitchell Bay Closed Area has a long history. In 1932, the U.S. Congress seriously considered closing all of Admiralty Island to hunting in order to create a bear refuge. As a compromise between development interests and preservation of bears, the Territorial Game Commission created the Pack Creek and Thayer Mountain closed areas. In 1984, several Unit 4 hunting guides proposed expanding the Pack Creek area to include Swan Cove, Swan Island, and Windfall Harbor. This proposal was approved along with a reduction in the Thayer Mountain closed area. The remaining Thayer Mountain closed area was renamed the Salt Lake Closed Area. In 1991, at the request of Angoon residents, the Salt Lake Closed Area was expanded to include the Mitchell Bay shoreline within 660 feet of mean high tide for the purpose of developing a bear viewing area and to provide economic opportunity for Angoon. The shoreline of Mitchell Bay is a special cooperative land management zone created by ANILCA. The majority of the land is owned by Kooztnoowoo, Inc., the Angoon ANSCA village corporation. The U.S. Forest Service manages surface resources and regulates public access as part of Admiralty Island National Monument and Wilderness on the condition that Kootznoowoo, Inc. be assured "quiet enjoyment" of the area. The closure proposal was an outgrowth of Kootznoowoo's interest in pursuing commercial non-consumptive recreation as part of its long-term development strategy for the area. There was growing concern at the time that bears wounded by hunters could pose a threat to local residents using the area for harvesting fish and other wildlife. (Taken from "Brown Bears of Unit 4 Past, Present and Future: A Status Report and Issues Paper" ADF&G 1998 http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/research_pdfs/98_brb_unit_4.pdf).

At the November 2004 Board of Game meeting, the board considered Proposal 67 which was a review of all the existing closed areas and controlled use areas within the Southeast Region. Department analysis was that the original purpose of the Mitchell Bay Closed Area was to reduce conflicts and provide safety between hunters and Angoon residents, as well as to recognize the cultural importance of brown bears in Angoon's history. The department stated that changing this

closed area would be contrary to the original intent. The board voted to retain status quo.

The author of this proposal is requesting the area be opened due to food security concerns brought to the Federal Subsistence Board by the community of Angoon. The author states that the brown bear hunting closure could be a factor limiting deer available to hunters.

Brown bears are the only large land predator in GMU 4. Brown bears occur at high densities throughout Unit 4, and they can be effective predators on young fawns. However, a few weeks after the early June fawning period, fawn remains are no longer found in brown bear scats. McCarthy (1989) analyzed scats from bears on Admiralty Island and found deer remains in up to 10% of spring scats. The author did not distinguish whether those remain were from young fawns or scavenged carcasses of winter-killed deer. During mid-summer, up to 14% of scats from bears using high elevation habitat (>400m) contained some deer remains, but deer remains were absent from summer scats of bears using low elevation habitat. Deer was not found in bear scats collected during late-summer and fall. Although brown bears have been reported to prey on older fawns and adult deer, the available evidence suggests that this is very rare and occurs opportunistically. Studies of radio-collared deer on Admiralty (Schoen and Kirchhoff 1990) and Chichagof (McCoy et al. 2015) islands in Unit 4 further support that brown bears rarely kill deer.

The author also suggests that opening Mitchell Bay to brown bear hunting could reduce human/bear conflicts associated with the Angoon community landfill because hunters could legally harvest bears in Angoon. Between RY12 and RY21, agency officials killed 6 brown bears in Angoon. While brown bears are culturally significant to residents of Angoon, brown bear hunting is not a common use of the area by local residents of Angoon so it is unknown if Angoon residents would increase their harvest of brown bears if the Mitchell Bay Closed Area was opened. Defense of life and property (DLP) regulations allow for the killing of brown bears in town that are a threat to public safety.

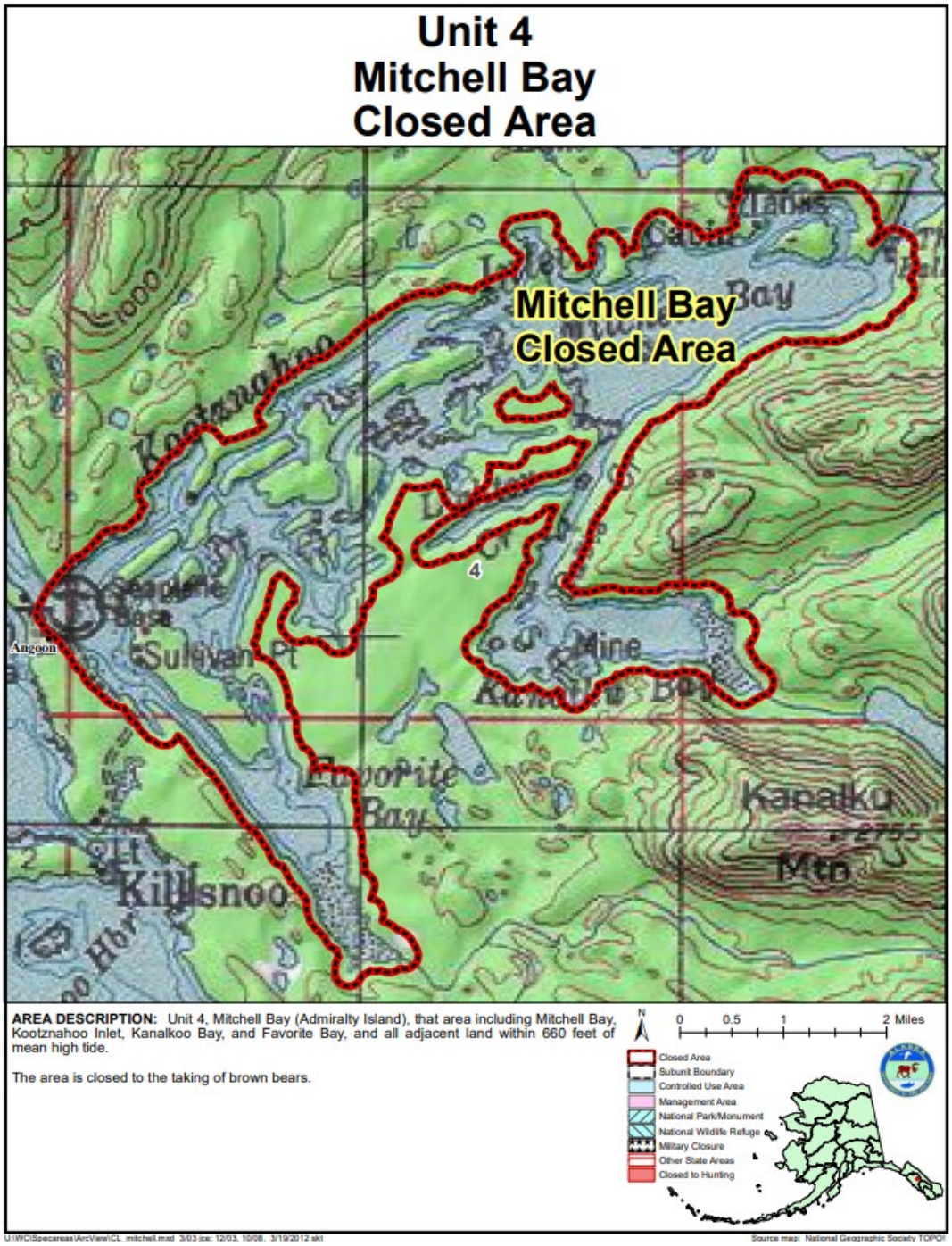

Figure 12-1. Map of the Mitchell Bay Closed Area

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal since there is no biological concern for some additional brown bear harvest on Admiralty Island; and the author's request is largely allocative between user groups.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the

department.

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PROPOSAL 13 – 5 AAC: 85.020. Hunting seasons and bag limits for brown bear. Change hunt boundaries of RB/DB088 and DB/RB089 to include Northeast Chichagof Island within RB/DB088 as follows:

RB/DB088 (outside drainages). Chichagof Island East Point (57.80'N, 134.94'W) following the common Guide Use Area line of 04-11 to 58.02'N, 135.96'W to 57.96'N, 136.09'W following the Guide Use Area line of 04-15 to include Yakobi and other adjacent islands; Baranof Island south and west of a line that follows the crest of the island from Nismeni Point (57°34' N. lat., 135°25' W. long.), to the entrance of Gut Bay (56°44' N. lat., 134°38' W. long.), including Kruzof and other adjacent islands (Figure 13-1).

Adjust the maximum 4% total human-caused mortality guideline in the Unit 4 Brown Bear Management Strategy (BBMS) to up to 15% in Guide Use Areas (GUA) 04-11, 04-15 and 04-16.

PROPOSED BY: David Summers

WHAT WOULD THE PROPOSAL DO? This proposal would change the RB/DB088 and RB/DB089 brown bear hunt boundaries to include parts of Northeast Chichagof Island and the Lisianski area in RB/DB088. This would extend the season closure date in this area from May 20 to May 31. This proposal would also raise the human-caused mortality guideline outlined in the BBMS from 4% to up to 15%.

WHAT ARE THE CURRENT REGULATIONS?

Unit 4 Remainder

Residents and nonresidents	Hunts	Dates
One bear every four	RB/DB088	Mar. 15 – May 31
regulatory years	RB/DB089	Mar. 15 – May 20

RB/DB088 (outside drainages): Chichagof Island south and west of a line that follows the crest of the island from Rock Point (58° N. lat., 136°21' W. long.), to Rodgers Point (57°35' N. lat., 135°33' W. long.) including Yakobi and other adjacent islands; Baranof Island south and west of a line that follows the crest of the island from Nismeni Point (57°34' N. lat., 135°25' W. long.), to the entrance of Gut Bay (56°44' N. lat., 134°38' W. long.), including Kruzof and other adjacent islands. (Figure 13-1).

RB/DB089 (inside drainages): Remainder of Unit 4. (Figure 13-2)

Under the Unit 4 brown bear management strategy (BBMS) Chichagof Island east of Port

Frederick and north of Tenakee Inlet has a guideline mortality level of 18 bears (7 female) annually.

There is a positive C&T finding for brown bears in Unit 4 outside the Juneau Nonsubsistence Area with an ANS of 5 – 10 bears.

Figure 13-1. RB/DB088 boundary with proposed change (yellow line).

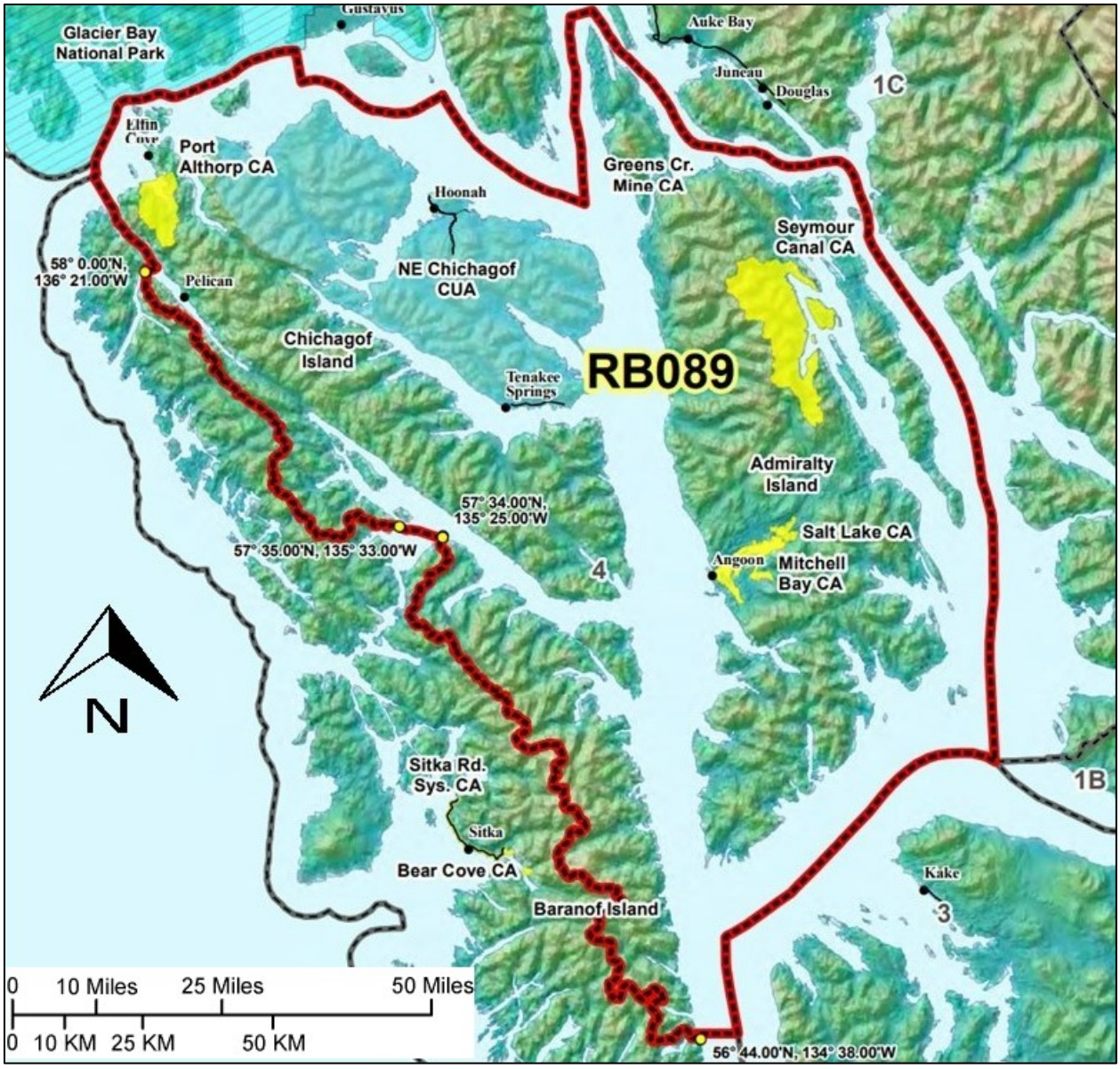

Figure 13-2. Current RB/DB089 Boundary

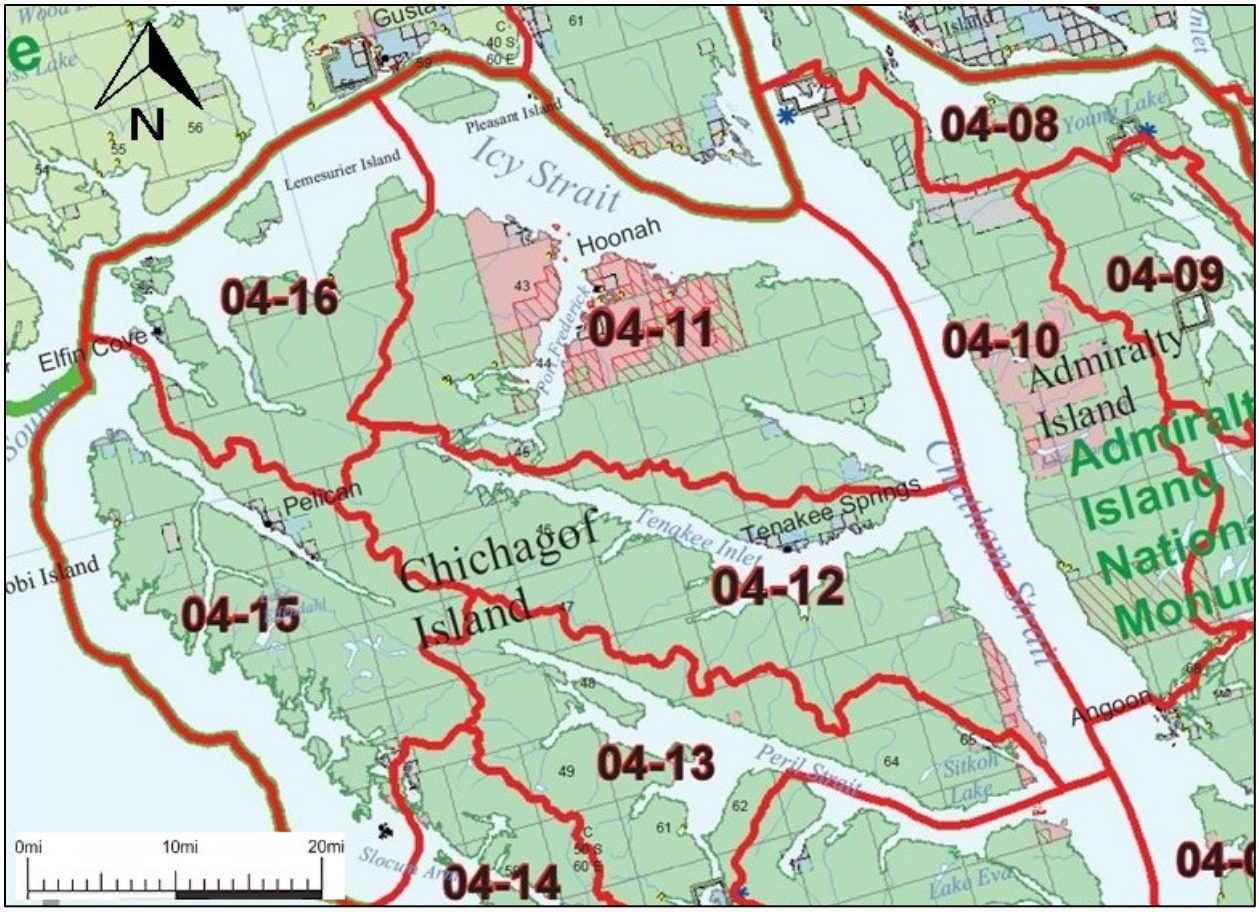

Figure 13-3. Guide Use Areas in proposal area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

This proposal, if adopted, would increase the length of the brown bear season in a large and highly accessible portion of Unit 4 by 11 days. The peak time-period for harvesting a brown bear in Unit 4 is May 11 – 20. During this 10-day period, 50% of the spring harvest occurs. While it is difficult to predict actual increased harvest, increasing the season length has the potential to significantly increase brown bear harvest as guides and resident hunters take advantage of this additional opportunity during this period of peak bear activity. For example, guides could opt to switch less successful early season hunts in April to this more productive period. There are currently three guide operations with authorizations to conduct up to 34 hunts (24, 6 and 4 hunts, respectively) in Guide Use Areas (GUA) 04-11, 04-15, and 04-16, respectively. The U.S. Forest Service administers commercial use permits (hunts) in Unit 4.

This proposal, if adopted, would also raise the maximum total human-caused mortality guideline from 4% of the total population to up to 15% in GUAs 04-11, 04-15, and 04-16. Under the BBMS, the department manages brown bears on a four-area strategy (Admiralty, Baranof, Northeast Chichagof [north of Tenakee Inlet and east of Frederick Sound], and the remainder of Chichagof)

with a maximum total human-caused mortality level of 4% of the population. The maximum allowable harvest translates to 62, 42, 18, and 50 bears, respectively. GUAs do not align with these management areas which has the potential to confound management. For example, if allowable mortality on northeast Chichagof Island went from 4% to 15% this would theoretically raise the allowable take from 18 to 68 bears.

BACKGROUND: The current hunt areas and dates (inside and outside drainages) have been in place for 42 years. The board first implemented these regulations by emergency order in April 1979 for the spring season and subsequently through regular board action for that fall. These changes were implemented over concerns that bear populations were in decline on Admiralty Island and more accessible areas of Baranof and Chichagof Islands (inside drainages). The outside drainages area of Unit 4 has an additional 11 days of spring hunting opportunity than the rest of Unit 4. This area is generally more difficult to access and sees less hunting pressure. During the last ten regulatory years (RY) (RY12 – RY21) the inside drainage has accounted for 80% of the spring harvest despite the season being 11 days shorter.

In 2000, the board adopted the Unit 4 BBMS. The BBMS is a comprehensive plan that addresses both consumptive and non-consumptive uses of brown bears. The guidelines in the plan along with current seasons and bag limits have been successful in providing a sustainable brown bear harvest while also providing high quality bear viewing opportunities. Changing the hunt boundaries in Unit 4 could result in increased conflicts in the field between user groups. The BBMS was reaffirmed by the board as recently as 2013.

Table 1.

	BBMS Guideline Mortality		***2019 – 2021 3-Year Average***	
ISLAND	**Total Bears**	**Female**	**Total Bears**	**Female**
Admiralty	62	23	48	7
Baranof	42	16	38	10
NE Chichagof	18	7	9	1
Chichagof (Remainder)	50	19	33	6
Total	**172**	**65**	**128**	**24**

The author of this proposal lists food security concerns brought to the Federal Subsistence Board by the community of Hoonah as support for this proposal. It is implied that increasing brown bear harvests in this area would increase Sitka black tailed deer hunting success.

Brown bears are the only large land predator in Unit 4. Brown bears occur at high densities throughout Unit 4, and they can be effective predators on young fawns. However, a few weeks after the early June fawning period, fawn remains are no longer found in brown bear scats.
McCarthy (1989) analyzed scats from bears on Admiralty Island and found deer remains in up to

10% of spring scats. The author did not distinguish whether those remain were from young fawns or scavenged carcasses of winter-killed deer. During mid-summer, up to 14% of scats from bears using high elevation habitat (>400m) contained some deer remains, but deer remains were absent from summer scats of bears using low elevation habitat. Deer was not found in bear scats collected during late summer and fall. Although brown bears have been reported to prey on older fawns and adult deer, the available evidence suggests that it is very rare and occurs opportunistically. Studies of radiocollared deer on Admiralty (Schoen and Kirchhoff 1990) and Chichagof (McCoy et al. 2015) islands in Unit 4 further support that brown bears rarely kill deer.

The proponent also cites the number of defense of life and property (DLP) kills as support for this proposal. He proposes adjusting the harvest objective of 4% of the population up to 15% to help reduce brown bear/human conflict and the number of DLPs. Brown bears have slow reproductive rates and are slow to recover from high harvest rates. Human caused mortality rates up to 15% would be unsustainable and result in long-term population declines. DLP deaths will never be eliminated from Unit 4, but the BBMS factors these in by including all human caused mortality into guidelines. Raising the recommended total human-caused mortality level from 4% to up to 15% for even part of Unit 4 constitutes a significant departure from current recommendations, and is a very high mortality rate.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal for biological and conservation reasons. Current hunt areas, seasons, and guideline mortality levels provide for sustainable harvests. Changing season dates and/or raising recommended mortality levels could result in unsustainable mortality and declining populations of brown bears in the proposal area. The proposal could also result in user group conflicts which are allocative in nature.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

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PROPOSAL 14 – 5 AAC: 85.020. Hunting seasons and bag limits for brown bear. Change hunt boundaries of RB/DB088 and DB/RB089 to include all of Lisianski Inlet drainage within RB/DB088 as follows:

RB/DB088 (outside drainages). From Point Lucan outside of the Port Althorp closed area following the Althorp Peninsula ridge and Guide Use Area (GUA) boundary of 04-15 south and west of a line which follows the crest of the island including Yakobi and other adjacent islands to (57.82701, -135.86404) over to (57.79173, -135.99264) south and west of a line which follows the crest of the island to Point (57°34’ N. lat., 135°25’ W. long.), to the entrance of Gut Bay (56°44’ N. lat., 134°38’ W. long.), including Kruzof and other adjacent islands (Figure 14-1).

PROPOSED BY: David Summers

WHAT WOULD THE PROPOSAL DO? This proposal would change the RB/DB088 and RB/DB089 brown bear hunt boundaries to include all of the Lisianski Inlet drainage in RB/DB088.

This would extend the season closure date in this area from May 20 to May 31.

WHAT ARE THE CURRENT REGULATIONS?

Unit 4 Remainder

Residents and nonresidents	Hunts	Dates
One bear every four	RB/DB088	Mar. 15 – May 31
regulatory years	RB/DB089	Mar. 15 – May 20

RB/DB088 (outside drainages): Chichagof Island south and west of a line that follows the crest of the island from Rock Point (58° N. lat., 136°21' W. long.), to Rodgers Point (57°35' N. lat., 135°33' W. long.) including Yakobi and other adjacent islands; Baranof Island south and west of a line that follows the crest of the island from Nismeni Point (57°34' N. lat., 135°25' W. long.), to the entrance of Gut Bay (56°44' N. lat., 134°38' W. long.), including Kruzof and other adjacent islands. (Figure 1).

RB/DB089 (inside drainages): Remainder of Unit 4.

Under the Unit 4 Brown Bear Management Strategy (BBMS) Chichagof Island (excluding NE Chichagof Island east of Port Frederick and north of Tenakee Inlet) has a guideline mortality level of 50 bears (19 female) annually.

There is a positive C&T finding for brown bears in Unit 4 with an ANS of 5 – 10 bears.

Figure 14-1. RB/DB088 boundary with proposed change (yellow line).

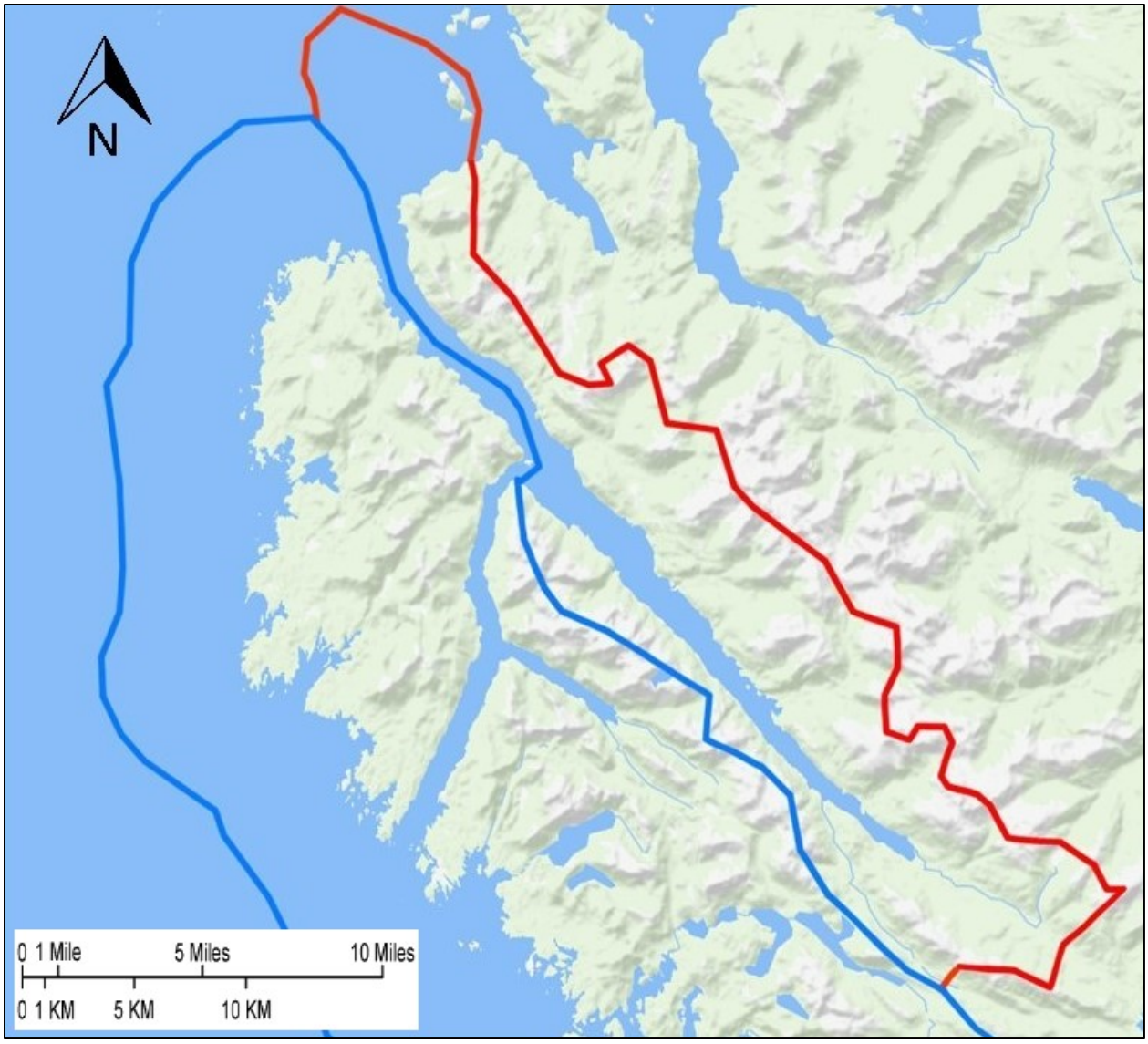

Figure 14-2. Close up of proposal area. Blue line is current boundary. Red line is proposed.

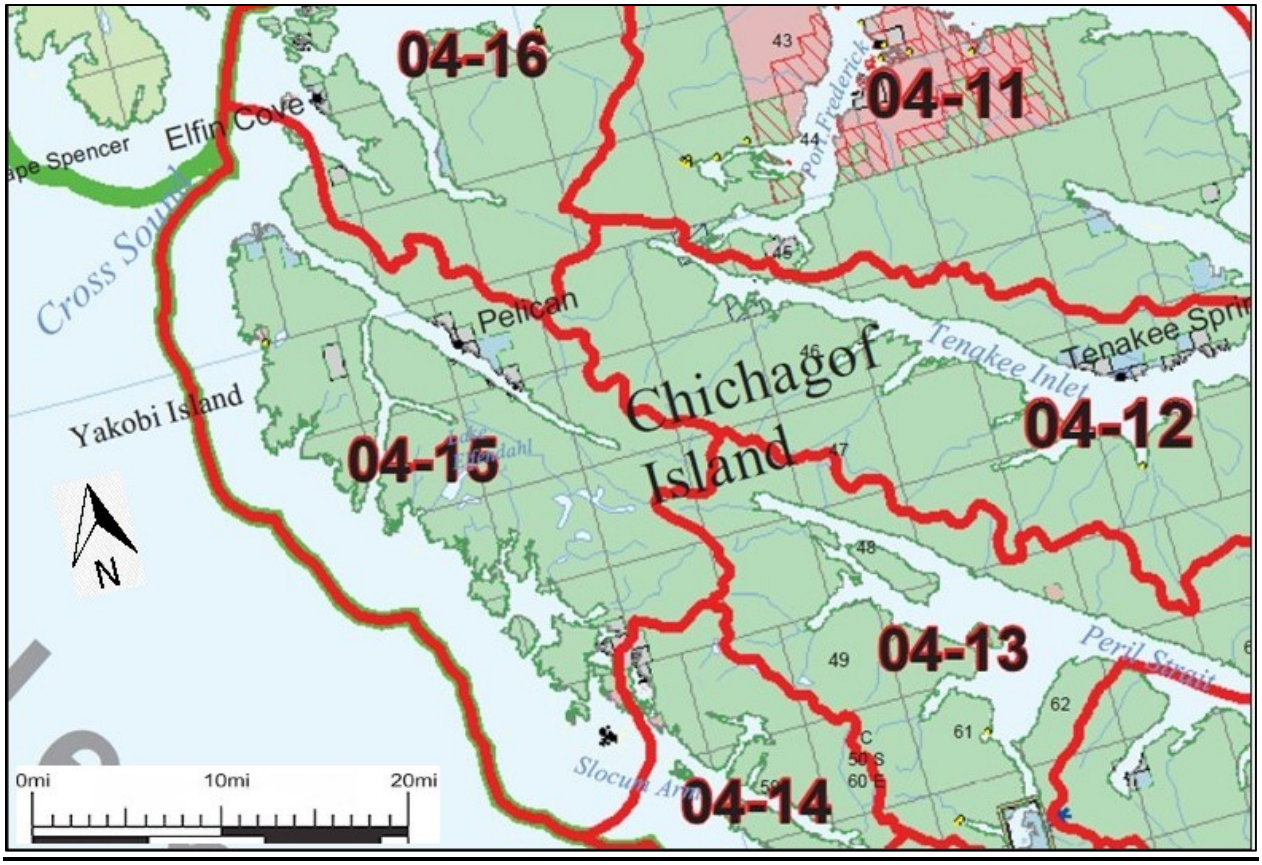

Figure 14-3. Map showing boundary of GUA 04-15. New RB/DB088 boundary would be northern boundary of 04-15 to where it intersects 04-13 and 04-14.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

This proposal, if adopted, would increase the length of the brown bear season in Lisianski Inlet by 11 days, and would increase the hunt area by following the GUA 14-05 boundary. The peak time-period for harvesting a brown bear in Unit 4 is May 11 – 20. During this 10-day period, 50% of the spring harvest occurs. While it is difficult to predict actual increased harvest, increasing the season length has the potential to increase brown bear harvest in this watershed as guides and resident hunters take advantage of this additional opportunity during this period of peak bear activity. For example, guides could opt to switch less successful early season hunts in April to this more productive period. There are currently two guide companies with authorizations to conduct up to 30 hunts (24 and 6 hunts, respectively) in GUA 04-15.

BACKGROUND:

In 2000, the board adopted the Unit 4 BBMS. The BBMS is a comprehensive plan that addresses both consumptive and non-consumptive uses of brown bears. The guidelines in the plan along with current seasons and bag limits have been successful in providing a sustainable brown bear harvest while also providing high quality bear viewing opportunities. Changing the hunt boundaries in

Unit 4 could result in increased conflicts in the field between user groups. The BBMS was reaffirmed by the board as recently as 2013.
The current guideline harvest level (GHL) for Chichagof Island Remainder is 50 bears. Harvest has averaged 36 bears (29 male, 7 female) over the past decade (RY12 – RY21). The most current population estimate for Chichagof Island Remainder is 1,250 bears.

The current hunt areas and dates (inside and outside drainages) in Unit 4have been in place for 42 years. The board first implemented these regulations by emergency order in April 1979 for the spring season and subsequently through regular board action for that fall. These changes were implemented over concerns that bear populations were in decline on Admiralty Island and the more accessible areas of Baranof and Chichagof Islands (inside drainages). The outside drainages area of Unit 4 has an additional 11 days of spring hunting opportunity than the rest of Unit 4. This area is generally more difficult to access and sees less hunting pressure. During the last ten regulatory years (RY12 – RY21) the inside drainage has accounted for 80% of the spring harvest despite the season being 11 days shorter.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. While it is likely that there will be increased harvest from this inlet if the proposal passes, it is a small area and not likely to cause a biological concern. However, user conflicts could result, and the department cautions against making changes to long-standing brown bear regulations without input from the Brown Bear Management Team.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

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PROPOSAL 15 – 5 AAC 92.510(a)(5)(B) Areas Closed to Hunting.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal would correct the southern boundary description of the Petersburg Road System Closed Area in regulation by changing it from "Crystal Lake campground" to "mile marker 17.22".

WHAT ARE THE CURRENT REGULATIONS?

5AAC 92.510(a)(5)(B):

"a strip one-fourth mile wide on each side of the Mitkof Highway from mile marker 8.75 of the Mitkof Highway to the Crystal Lake campground is closed to the taking of big game, except wolves"

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This change

would provide clarification to the public and remove confusion about the Petersburg Road System Closed Area boundary. There would be no changes to the size or location of the closed area.

BACKGROUND: The current description of the Petersburg Road System Closed Area is inaccurate. The southernmost boundary of the closed area is described as the Crystal Lake campground (Figure 15-1). While the US Forest Service does maintain a public use facility at mile marker 17.22 of the Mitkof Highway, there is no campground present. Additionally, the name of the public use facility is not consistent on currently available maps: it varies from "Blind Slough Campground" to "Blind Slough Picnic Area".

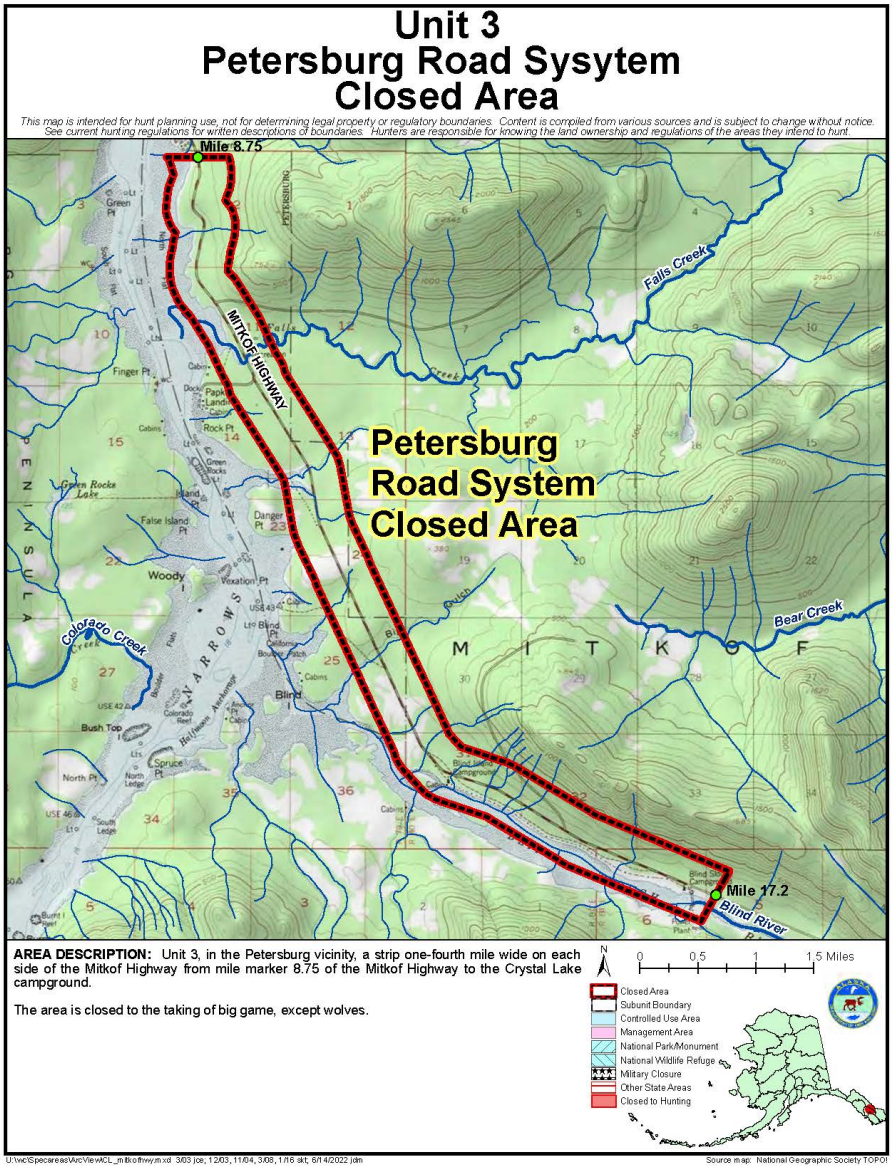

Figure 15-1: Current map of Petersburg Road System Closed Area showing the nonexistant Crystal Lake Campground.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. Adoption of this proposal would provide clarification to the public and remove confusion about the Petersburg Road System Closed Area boundary.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 16 – 5 AAC 85.030. Hunting seasons and bag limits for deer.

PROPOSED BY: Kaleb Baird

WHAT WOULD THE PROPOSAL DO? This proposal would change the deer season opening from October 1 to August 1 in the Petersburg Management Area, extending the current three-month season to five months.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General hunts)	Nonresident Open Season
Unit 3, that portion of Mitkof Island within the Petersburg Management Area 2 bucks	Oct. 1 - Dec. 15	Oct. 1 - Dec. 15
Unit 3, including the remainder of Mitkof Island, Woewodski, and Butterworth Islands 1 buck	Oct. 1 - Nov. 7	Oct. 15 - Oct. 31

There is a positive C&T finding for deer in Unit 3 with an ANS of 150-175 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

If adopted, this proposal would change the Petersburg Management Area deer season from October 1-December 15 to August 1-December 15, extending the season by two months. The season extension would provide certified bowhunters an early season deer hunting opportunity close to

the city of Petersburg.

BACKGROUND: The Petersburg Management Area (PMA) on Mitkof Island was originally established as an archery-only hunt area in 2002, primarily in response to complaints about high deer numbers in residential areas of Petersburg (Figure 16-1). Prior to this time, a city prohibition on the discharge of firearms and state regulatory language prohibited deer hunting within the Petersburg city limits. High deer numbers in residential areas, bolstered by artificial food sources and intentional feeding, gave rise to frequent complaints about nuisance deer problems and public safety concerns associated with deer-vehicle collisions.

When the PMA was created, deer hunting in the remainder of Mitkof Island was managed under a restrictive two-week deer season with a one buck bag limit. The deer season in the PMA was designed to provide archers with an additional two weeks of hunting opportunity and afforded them a one-month season (Oct. 15-Nov. 15) during the deer rut. In 2007 the season was extended in the PMA by one month and the bag limit increased to two bucks. The season was extended by two weeks in 2019 to align with an adopted extension of the Mitkof Island general deer season. The current PMA deer season is two and a half months long, running from October 1 to December 15, with a two buck bag limit. Hunting within the PMA requires that hunters have successfully completed a department-approved bowhunter education course.

The PMA is relatively small in area (approx. 10 sq. mi.) and the average reported harvest over the last five seasons was 6 deer, ranging from 3 to 11.

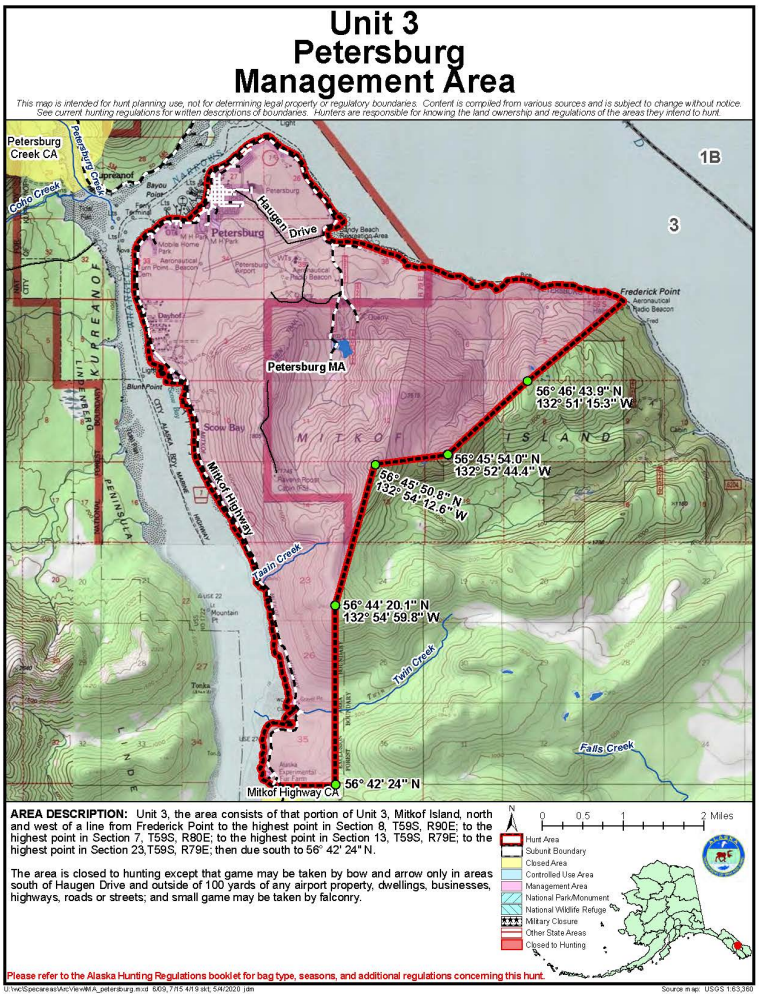

Figure 16-1. Unit 3 Petersburg Management Area.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because the proposal does not create biological concerns for the deer population on Mitkof Island, which can be sustainably managed under the current or the proposed regulations.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

****

PROPOSAL 17 – 5 AAC 85.035. Hunting seasons and bag limits for elk.

PROPOSED BY: Chris Guggenbickler, Jordan Buness

WHAT WOULD THE PROPOSAL DO? This proposal would create a bull only drawing hunt with up to 25 permits for elk on Zarembo Island in Unit 3 with a season of October 1-31.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.035. Hunting seasons and bag limits for elk.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(1) Unit 3, that portion bounded by a line beginning at the intersection of Stikine Strait and Clarence Strait, running southeast following the midline of Clarence Strait, down to the intersection with Earnest Sound, then northeast following the midline of Earnest Sound, excluding the Niblack Islands, to its intersection with Zimovia Strait, then northwest following the western shoreline of Zimovia Strait to its intersection with Chichagof Passage, then west along the midline of Chichagof Passage to its intersection with Stikine Strait, then west and south Along the midline of Stikine Strait, back to the point of beginning.		
1 bull by drawing permit only, And by bow and arrow only; up To 50 permits will be issued; or	Sept. 1−Sept. 30 (General hunt only)	Sept. 1−Sept. 30
1 bull by drawing permit only; up to 250 permits will be issued; or	Oct. 1−Oct. 31 (General hunt only)	Oct. 1−Oct. 31
1 bull by registration permit only	Nov. 15−Nov. 30 (General hunt only)	Nov. 15−Nov. 30
Unit 3, Zarembo, Bushy, and Shrubby Islands, and the Kashevarof	No open season.	No open season.

Islands

There is a negative C&T finding for elk in Unit 3.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would create an elk drawing hunt for residents and nonresidents on Zarembo Island (Figure 17-1). Based on annual aerial survey data and reports received from the public, the Zarembo elk population is estimated to be less than 50 total animals. If this proposal were adopted the long-term stability of the elk herd could be jeopardized. It is anticipated that harvest success would be higher on Zarembo Island than on Etolin Island because of greater access due to wide-spread logging road access, which would necessitate a conservative harvest to ensure sustainability.

BACKGROUND: In 1987 elk were translocated to Southeast Alaska and released on Etolin Island. Following initial losses, the population stabilized, eventually increased, and extended its range beyond Etolin Island. In time a small population colonized Zarembo Island.

In 1996 the board established a bull only drawing hunt in Unit 3. In 2000 the board established boundaries for the Unit 3 drawing hunt area. The original drawing hunt area included both Etolin and Zarembo Islands. Based on a previous population estimate, a harvest quota of 10 bulls was established for Zarembo Island. In 2005, six bulls were harvested on Zarembo during the September and October drawing permit hunts and managers felt the 4 bulls remaining in the quota were insufficient to allow for an open registration permit hunt. Given such a small allowable harvest, opening the registration elk hunt in this area would have run the risk of overharvest, which would have been detrimental to the long-term stability of the population. As a result, prior to the start of the late-November RE325 elk registration hunt, an emergency order was issued closing the Zarembo Island portion of the hunt area.

In the aftermath of the 2005 emergency closure of the elk season on Zarembo Island and prior to the start of the 2006 season the department made the decision not to reopen the elk season on Zarembo Island until the population and bull:cow ratio increased. In 2013, following several consecutive years of emergency closures, the board took similar regulatory action, closing Zarembo Island to elk hunting. Zarembo Island has not had an elk hunt since that time and remains closed to elk hunting to date.

Abundance and composition of elk populations cannot be reliably monitored in the dense coastal rainforest of Unit 3, and no data are available to make meaningful elk population or herd composition estimates for Zarembo Island. The island was originally thought to support two separate elk herds. However, information gained during aerial shoreline surveys and from a single cow elk radiocollared from 2008–2010 suggests that there is one main herd on the island which fragments into smaller groups during the winter and spring months.

To date, the greatest number of elk observed on Zarembo Island occurred on August 16, 2004,

when a single herd comprised of 36 individuals was observed south of Baht Harbor. In October of 2021 a group of 35 elk were observed in the vicinity of Point Saint John, comprised of 21 cows, 7 calves, and 7 bulls.

Between 1997 and 2005, when Zarembo Island was included in the Unit 3 elk hunting area, an average of three elk were harvested annually, ranging from one to six elk (Figure 17-2). There are no available data to suggest that the Zarembo Island elk population has increased since hunting was discontinued in 2005.

In 2020 the Federal Subsistence Board determined that rural residents of Units 1–5 have customary and traditional use of elk on federal lands in Unit 3. Recently, proposals have been submitted to establish federal subsistence elk hunts. During the April 2022 Federal Subsistence Board meeting the FSB adopted a proposal creating a federal general season for elk outside of Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands in Unit 3.

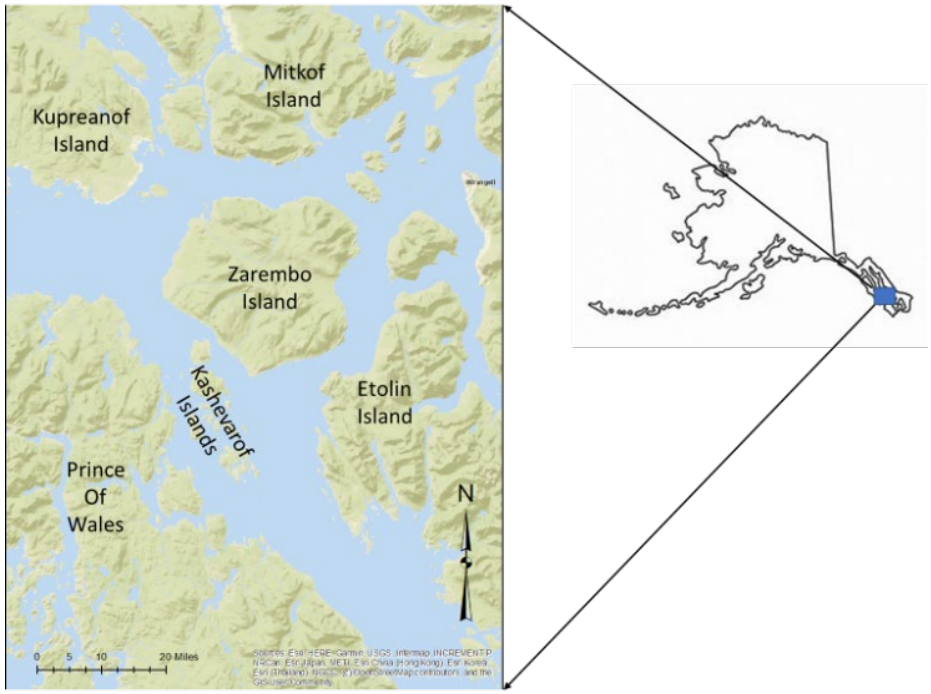

Figure 17-1. Area reference map.

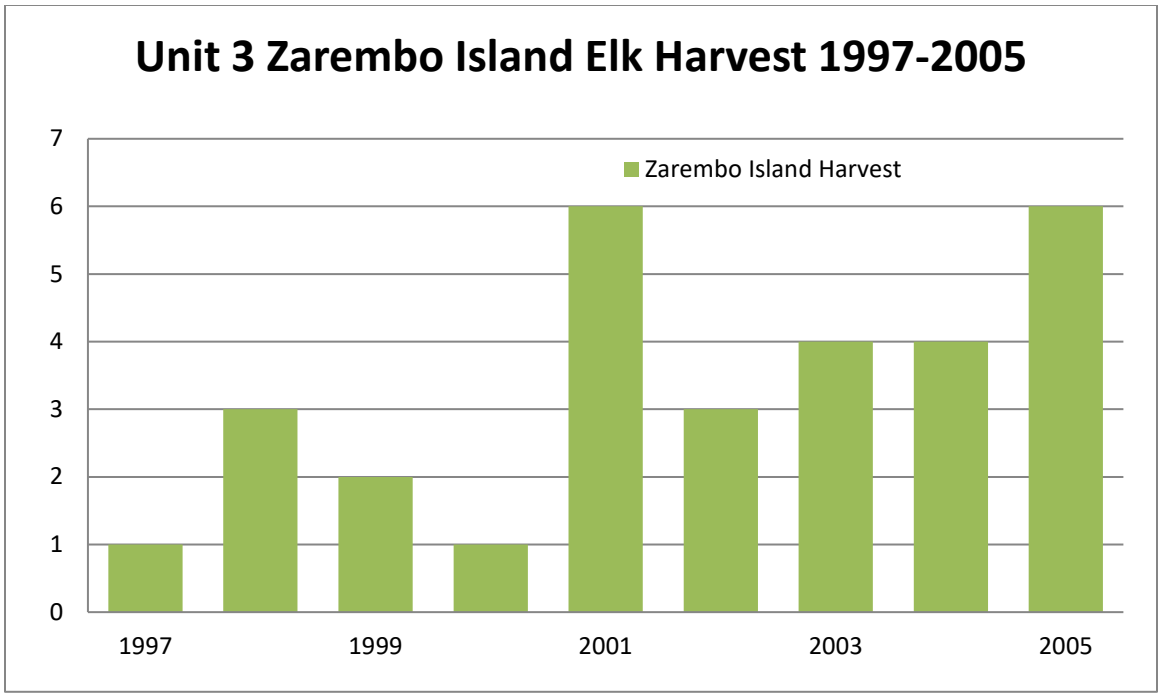

Figure 17-2. Unit 3 Zarembo Island elk harvest, 1997-2005.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. The department has no data to suggest an increase in the Zarembo Island elk population since hunting was closed in the fall of 2005. Harvesting elk from this population may significantly impact the existing herd. Should this proposal be adopted, the department asks that a conservative number of permits be issued to ensure sustainability of the herd.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 18 – 5 AAC 85.035. Hunting seasons and bag limits for elk.

PROPOSED BY: Kaleb Baird

WHAT WOULD THE PROPOSAL DO? This proposal would create a bull only drawing hunt with up to 5 permits for elk on Zarembo, Bushy, Shrubby, and the Kashevarof Islands in Unit 3 with a season of September 15-October 15.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.035. Hunting seasons and bag limits for elk.

Resident
Open Season

Units and Bag Limits	(Subsistence and General Hunts)	Nonresident Open Season
(1) Unit 3, that portion bounded by a line beginning at the intersection of Stikine Strait and Clarence Strait, running southeast following the midline of Clarence Strait, down to the intersection with Earnest Sound, then northeast following the midline of Earnest Sound, excluding the Niblack Islands, to its intersection with Zimovia Strait, then northwest following the western shoreline of Zimovia Strait to its intersection with Chichagof Passage, then west along the midline of Chichagof Passage to its intersection with Stikine Strait, then west and south Along the midline of Stikine Strait, back to the point of beginning.		
1 bull by drawing permit only, And by bow and arrow only; up To 50 permits will be issued; or	Sept. 1−Sept. 30 (General hunt only)	Sept. 1−Sept. 30
1 bull by drawing permit only; up to 250 permits will be issued; or	Oct. 1−Oct. 31 (General hunt only)	Oct. 1−Oct. 31
1 bull by registration permit only	Nov. 15−Nov. 30 (General hunt only)	Nov. 15−Nov. 30
Unit 3, Zarembo, Bushy, and Shrubby Islands, and the Kashevarof Islands	No open season.	No open season.

There is a negative C&T finding for elk in Unit 3.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would create an elk drawing hunt for residents and nonresidents on Zarembo, Bushy, Shrubby, and Kashevarof Islands (Figure 18-1). Based on annual aerial survey data and reports received from the public the Zarembo elk population is estimated to be fewer than 50 total animals. If this proposal were adopted the long-term stability of the elk herd could be jeopardized. It is anticipated that harvest success would be higher on Zarembo Island than on Etolin Island because of greater access due to wide-spread logging roads, which would necessitate a conservative harvest to ensure sustainability.

BACKGROUND: In 1987 elk were translocated to Southeast Alaska and released on Etolin Island. Following initial losses, the population stabilized, eventually increased, and extended its range beyond Etolin Island. In time a small population colonized Zarembo Island.

In 1996 the board established a bull only drawing hunt in Unit 3. In 2000 the board established boundaries for the Unit 3 drawing hunt area. The original drawing hunt area included both Etolin and Zarembo Islands. Based on a previous population estimate, a harvest quota of 10 bulls was established for Zarembo Island. In 2005, six bulls were harvested on Zarembo during the September and October drawing permit hunts and managers felt the 4 bulls remaining in the quota were insufficient to allow for an open registration permit hunt. Given such a small allowable harvest, opening the registration elk hunt in this area would have run the risk of overharvest, which would have been detrimental to the long-term stability of the population. As a result, prior to the start of the late-November RE325 elk registration hunt, an emergency order was issued closing the Zarembo Island portion of the hunt area.

In the aftermath of the 2005 emergency closure of the elk season on Zarembo Island and prior to the start of the 2006 season the department made the decision not to reopen the elk season on Zarembo Island until the population and bull:cow ratio increased. In 2013, following several consecutive years of emergency closures, the board took similar regulatory action, closing Zarembo Island to elk hunting. Zarembo Island has not had an elk hunt since that time and remains closed to elk hunting to date.

Abundance and composition of elk populations cannot be reliably monitored in the dense coastal rainforest of Unit 3, and no data are available to make meaningful elk population composition estimates for Zarembo Island. The island was originally thought to support two separate elk herds. However, information gained during aerial surveys and from a single cow elk radiocollared from 2008–2010 suggests that there is one main herd on the island which fragments into smaller groups during the winter and spring months.

To date, the greatest number of elk observed on Zarembo Island occurred on August 16, 2004, when a single herd comprised of 36 individuals was observed south of Baht Harbor. In October of 2021 a total of 35 elk were observed in the vicinity of Point Saint John, comprised of 21 cows, 7 calves, and 7 bulls.

Between 1997 and 2005, when Zarembo Island was included in the Unit 3 elk hunting area, an average of three elk were harvested annually, ranging from one to six elk (Figure 18-2). There are no available data to suggest that the Zarembo Island elk population has increased since hunting was discontinued in 2005.

In 2020 the Federal Subsistence Board determined that rural residents of Units 1–5 have customary and traditional use of elk on federal lands in Unit 3. Recently proposals have been submitted to establish federal subsistence elk hunts in Unit 3. During the April 2022 Federal Subsistence Board meeting the FSB adopted a proposal creating a federal general season for elk outside of Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands in Unit 3.

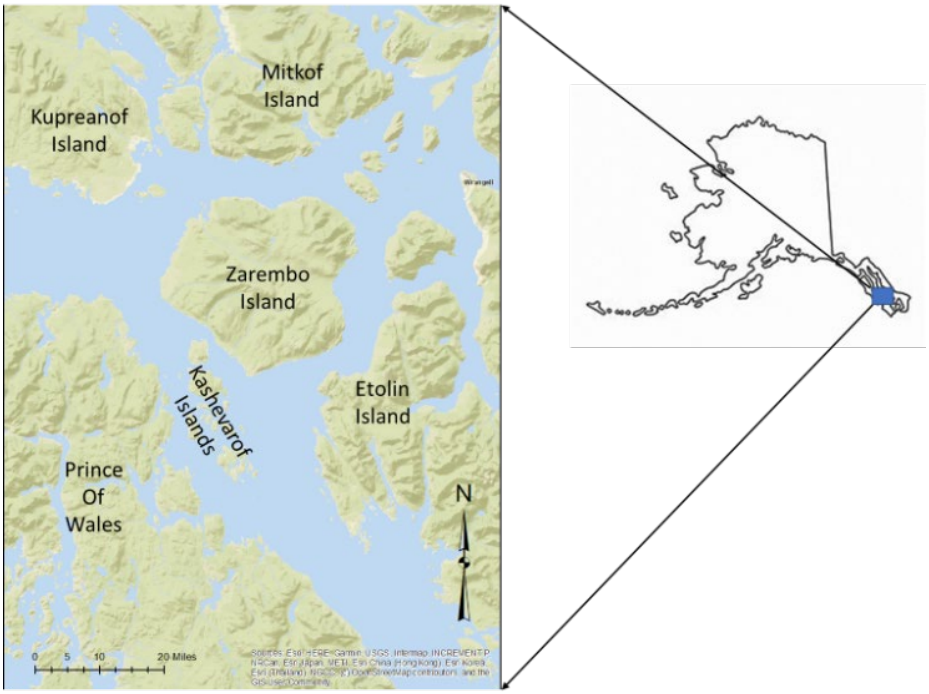

Figure 18-1. Area reference map.

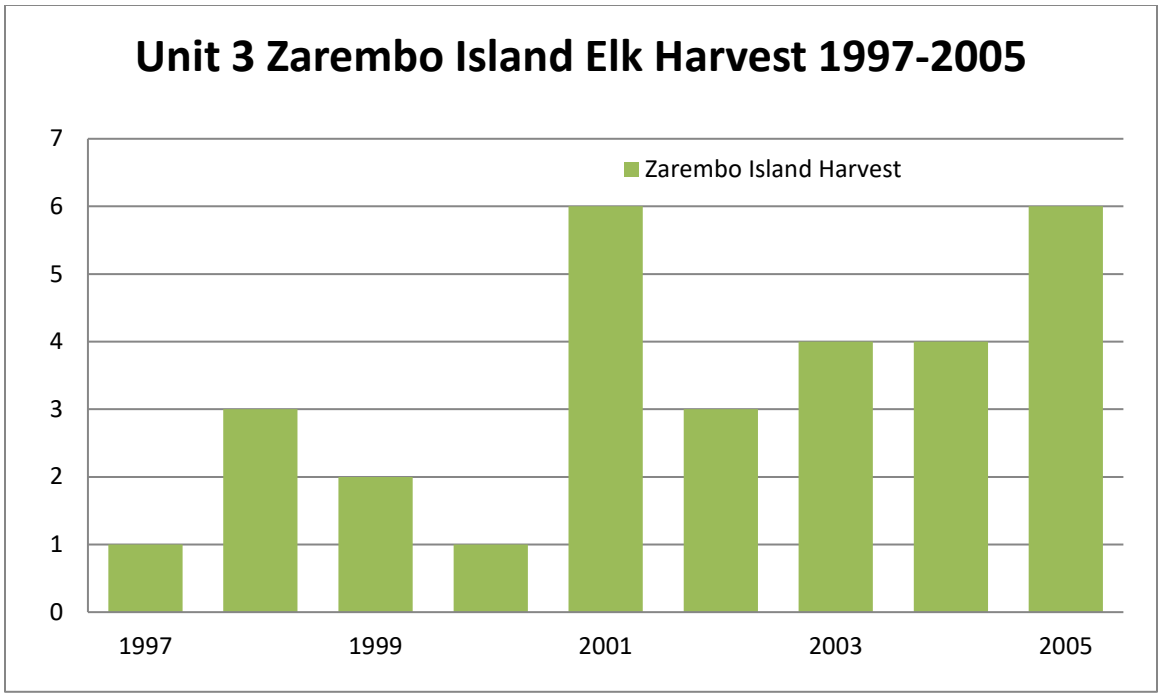

Figure 18-2. Unit 3 Zarembo Island elk harvest, 1997-2005.

DEPARTMENT COMMENTS: The department is **OPPOSED to** this proposal. The department has no data to suggest an increase in the Zarembo Island elk population since hunting was closed in the fall of 2005. Harvesting elk from this population may significantly impact the existing herd. Should this proposal be adopted, the department asks that a conservative number of permits be issued to ensure sustainability of the herd.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 19 – 5 AAC 85.035 Hunting seasons and bag limits for elk.

PROPOSED BY: Ketchikan Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would decrease the DE318 archery draw hunt from the entire month of September to only the first two weeks of September. In addition, this proposal would create a new resident only draw hunt with no weapons restriction (DE319), 25 available permits, and the season dates of September 16–30. This proposal would also reduce the number of DE321 draw permits from 50 to 40, eliminate the DE323 drawing hunt, and change the RE325 season dates from November 15-30 to November 1–December 1.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.035. Hunting seasons and bag limits for elk.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(1) Unit 3, that portion bounded by a line beginning at the intersection of Stikine Strait and Clarence Strait, running southeast following the midline of Clarence Strait, down to the intersection with Earnest Sound, then northeast following the midline of Earnest Sound, excluding the Niblack Islands, to its intersection with Zimovia Strait, then northwest following the western shoreline of Zimovia Strait to its intersection with Chichagof Passage, then west along the midline of Chichagof Passage to its intersection with Stikine Strait, then west and south Along the midline of Stikine Strait, back to the point of beginning.		
1 bull by drawing permit only, and by bow and arrow only; up to 50 permits will be issued; or	Sept. 1−Sept. 30 (General hunt only)	Sept. 1−Sept. 30
1 bull by drawing permit only; up to 250 permits will be issued; or	Oct. 1−Oct. 31 (General hunt only)	Oct. 1−Oct. 31
1 bull by registration permit only	Nov. 15−Nov. 30 (General hunt only)	Nov. 15−Nov. 30
Unit 3, Zarembo, Bushy, and Shrubby Islands, and the Kashevarof Islands	No open season	No open season

There is a negative C&T finding for elk in Unit 3.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted the overall number of elk drawing permits would decrease from 125 to 90, lowering overall draw permit opportunity.

Despite the overall reduction in drawing permits, changing the last two weeks of September from an archery season to a nonrestricted weapons season, and increasing the November registration hunt by two weeks could result in an increase in harvest that is unsustainable. Bull elk are more susceptible to harvest during the rut, and the elk rut runs from September through mid-October. If adopted this proposal would allow for the use of rifles during the peak of rut. There is an unlimited number of registration permits issued for the two-week November season. Over the last 10 years 20% of Etolin elk were taken during the registration hunt. It is likely that the elk harvest would increase with a two-week expansion of the registration season.

BACKGROUND: In 1985 the Alaska Legislature passed a law that required the introduction of 50 elk to Etolin Island. In spring of 1987, 33 Roosevelt elk (*C. e. roosevelti*) and 17 Rocky Mountain elk (*C. e. nelsoni*) were translocated to Southeast Alaska. Roosevelt elk were released at Dewey Anchorage on the southwest side of Etolin Island, and Rocky Mountain elk were released just north of Johnson Cove on the northwest shore of Etolin Island. The department's initial plan was to manage the Etolin Island elk population with the goal of allowing a limited elk hunt when the population reached 250 elk and could sustain a harvest of 20 bulls. Because estimating elk abundance is difficult in the densely forested habitats found in Unit 3, the department has designed a hunt strategy that restricts harvest mainly through a limited drawing permit structure.

It was determined that the introduced elk had reached the population level for hunting by 1996. In October of that year, the board established an elk season in Unit 3. The board authorized the department to issue up to 30 elk drawing permits for an October 1-31 season with a bag limit of one bull. The board also made a negative customary and traditional use finding for introduced elk in Unit 3 at this time. In 1997, the first year of elk hunting in Southeast Alaska, ADF&G issued a total of 29 elk permits, including 27 drawing permits and 2 public raffle permits. In fall of 1998, the board authorized increasing the number of drawing permits from 30 to 70 and added a 2-week period (September 15–30) for archery-only hunting. In fall of 2000, the board increased the number of drawing permits from 70 to 120 and extended the archery season by 2 weeks (September 1–30). In fall of 2002, the board split the DE320 elk drawing permit hunt into separate archery (DE318) and rifle (DE322) permit hunts and authorized the department to issue a combined total of up to 300 permits. In fall of 2004, the board adopted several changes to the structure of the Unit 3 elk hunt. The DE322 rifle hunt, which had encompassed the entire month of October, was split into 2 separate drawing permit hunts, each 2 weeks long. The board also authorized a late season registration elk hunt (RE325) in Unit 3, which allows permit holders to harvest bull elk within the boundaries of the drawing hunt area during the last 2 weeks of November. Due to concerns about

declining harvest and success rates, the department reduced the number of drawing permits to 125 in 2007.

The current Unit 3 elk hunt area includes Etolin Island and a collection of small islands to the south. The state presently offers 3 drawing elk hunts (DE318, DE321, and DE323) and issues a total of 125 drawing permits annually. A late season state registration hunt is also offered, with an average of 54 permits issued annually over the last 10 seasons. Both resident and nonresident hunters are eligible to obtain drawing and registration permits for Unit 3 elk. However, of the 53 elk permits issued to nonresident hunters between 2012 and 2021 only 15 reported hunting and only one was successful. Between 2012 and 2021 an average of 179 elk permits were issued for Unit 3 elk (Table 19-1). Of the permitted hunters during this period an average of 41% reported that they had hunted, ranging from 31% in 2015 to 47%. in 2019.

During the first 10 elk seasons on Etolin Island an average of eight bulls were harvested annually, ranging from 1 to 14 bulls (Figure 19-1). Over the last 10 seasons harvest has stabilized and an average of six elk were harvested annually, ranging from four in 2013 to nine in 2017. Most elk during this period were harvested under the first unrestricted weapons drawing hunt (DE321) in October (Figure 19-2). Archery hunters harvested an average of one elk during the September bow and arrow only drawing hunt. Hunter success over the last 10 seasons averages 8%, ranging from 5% in 2013 to 12% in 2015.

Abundance and composition of elk populations cannot be reliably monitored in the dense coastal rainforest of Unit 3, and no data are available to make meaningful elk population composition estimates for Etolin Island. However, recent aerial surveys combined with anecdotal reports suggest low productivity and recruitment in the Etolin Island elk herd. In July of 2020 a total of 43 cows and only 2 calves were observed during a flight over open alpine habitat on the island. During a survey by department staff in early June 2022 a total of 12 cow elk and no calves were observed and a member of the public reported seeing a total of 26 cows, 1 calf, and 2 bulls in late August.

In 2020 the Federal Subsistence Board determined that rural residents of Units 1–5 have customary and traditional use of elk on federal lands in Unit 3. Recently proposals have been submitted to the federal board to establish federal subsistence elk hunts in Unit 3. During the April 2022 Federal Subsistence Board meeting the FSB adopted a proposal creating a federal general season for elk outside of Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands in Unit 3.

Table 19-1. Unit 3 elk permits and harvest, 2012-2021.

Reg Year	Total Permits	Permits Hunted	% Hunted	Permits	% Success	Hunter	Total Harvest
2012	173	72	42		10		7
2013	187	77	41		5		4
2014	184	76	41		7		5
2015	186	57	31		12		7
2016	196	73	37		7		5
2017	174	80	46		11		9
2018	189	86	46		8		7
2019	182	85	47		8		7
2020	166	73	44		7		5
2021	155	58	37		9		5

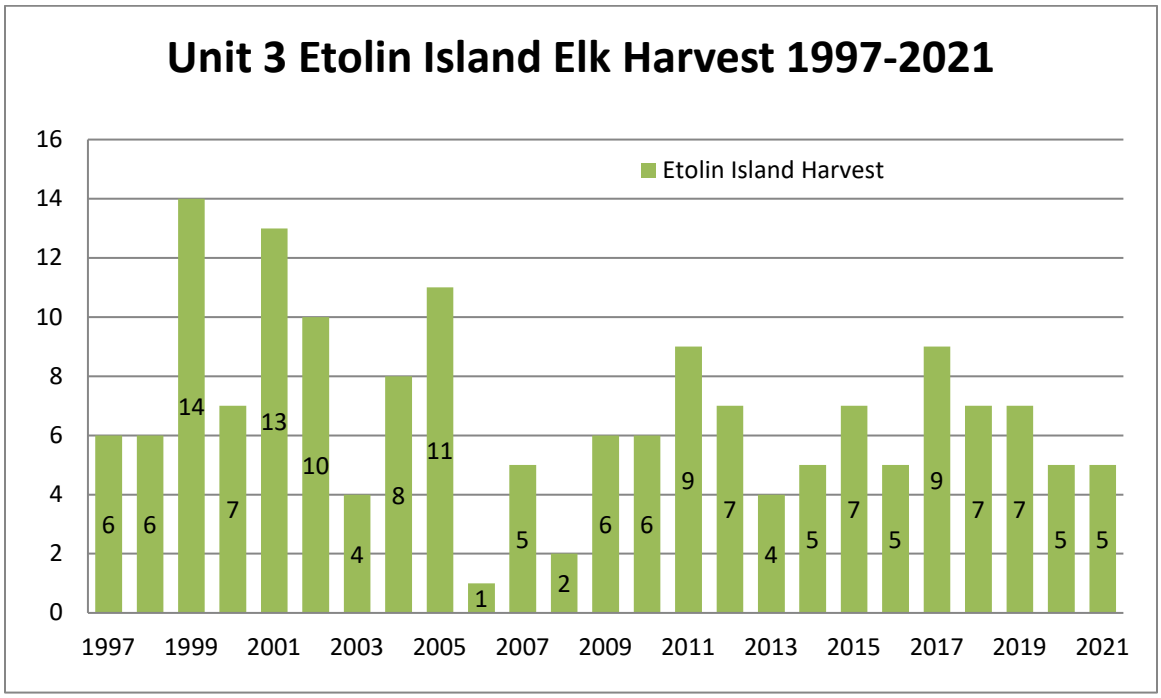

Figure 19-1. Unit 3 Elk harvest, 1997-2021.

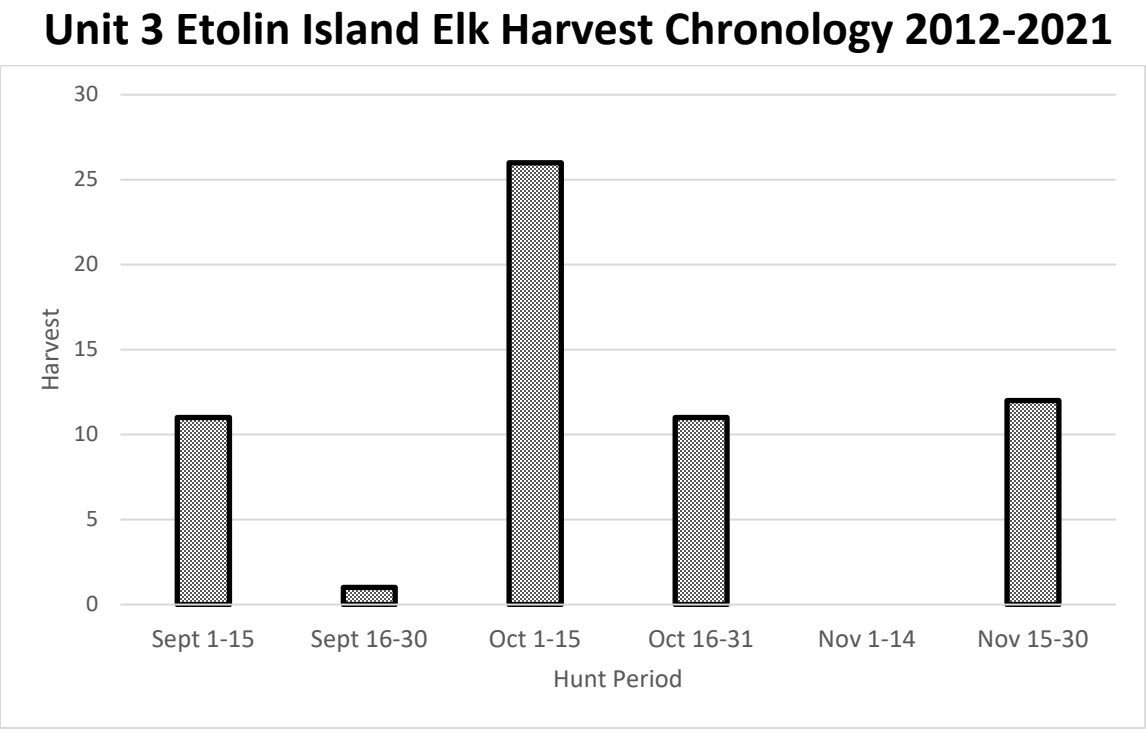

Figure 19-2. Chronology of Etolin Island elk harvest, 2012–2021.

DEPARTMENT COMMENTS: The department is **OPPOSED to** this proposal. A change in methods and means may lead to increased harvest that may reduce overall hunting opportunity because of a need to close seasons early. This proposal has allocative elements concerning residency of hunters.

COST ANALYSIS: Adoption of this proposal would result in additional administrative costs for the department.

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PROPOSAL 20 – 5 AAC 85.035. Hunting seasons and bag limits for elk.

PROPOSED BY: Matt Allen

WHAT WOULD THE PROPOSAL DO? This proposal would split the current Unit 3 October elk hunt area into two hunt areas, allocating a total of 20 draw permits to the northern hunt area and 80 permits to the southern hunt area.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.035. Hunting seasons and bag limits for elk.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(1) Unit 3, that portion bounded by a line beginning at the intersection of Stikine Strait and Clarence Strait, running southeast following the midline of Clarence Strait, down to the intersection with Earnest Sound, then northeast following the midline of Earnest Sound, excluding the Niblack Islands, to its intersection with Zimovia Strait, then northwest following the western shoreline of Zimovia Strait to its intersection with Chichagof Passage, then west along the midline of Chichagof Passage to its intersection with Stikine Strait, then west and south Along the midline of Stikine Strait, back to the point of beginning.		
1 bull by drawing permit only, and by bow and arrow only; up to 50 permits will be issued; or	Sept. 1−Sept. 30 (General hunt only)	Sept. 1−Sept. 30
1 bull by drawing permit only; up to 250 permits will be issued; or	Oct. 1−Oct. 31 (General hunt only)	Oct. 1−Oct. 31
1 bull by registration permit only	Nov. 15−Nov. 30 (General hunt only)	Nov. 15−Nov. 30
Unit 3, Zarembo, Bushy, and Shrubby Islands, and the Kashevarof Islands	No open season	No open season

There is a negative customary and traditional use finding for elk in Unit 3.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would likely decrease harvest opportunity for hunters drawn for the proposed northern hunt area. Since elk hunts began on Etolin Island in 1997 only 29 bulls have been harvested in the proposed northern area, or 17% of the total historical Etolin Island elk harvest, and no harvest occurred in the proposed northern hunt area in 11 of 25 seasons.

BACKGROUND: In 1985 the Alaska Legislature passed a law that required the introduction of 50 elk to Etolin Island. In spring of 1987, 33 Roosevelt elk (*C. e. roosevelti*) and 17 Rocky Mountain elk (*C. e. nelsoni*) were translocated to Southeast Alaska. Roosevelt elk were released at Dewey Anchorage on the southwest side of Etolin Island, and Rocky Mountain elk were released just north of Johnson Cove on the northwest shore of Etolin Island. The department's initial plan was to manage the Etolin Island elk population with the goal of allowing a limited elk hunt when the population reached 250 elk and could sustain a harvest of 20 bulls. Because estimating elk abundance is difficult in the densely forested habitats found in Unit 3, the department has designed a hunt strategy that restricts harvest mainly through a limited drawing permit structure.

The department determined that the introduced elk had reached the population level for hunting by 1996. In October of that year, the board established an elk season in Unit 3. The board authorized the department to issue up to 30 elk drawing permits for an October 1-31 season with a bag limit of one bull. The board also made a negative customary and traditional finding for introduced elk in Unit 3 at this time. In 1997, the first year of elk hunting in Southeast Alaska, ADF&G issued a total of 29 elk permits, including 27 drawing permits and 2 public raffle permits. In fall of 1998, the board authorized increasing the number of drawing permits from 30 to 70 and added a 2-week period (September 15-30) for archery-only hunting. In fall of 2000, the board increased the number of drawing permits from 70 to 120 and extended the archery season by 2 weeks (September 1-30). In fall of 2002, the board split the DE320 elk drawing permit hunt into separate archery (DE318) and rifle (DE322) permit hunts and authorized the department to issue a combined total of up to 300 permits. In fall of 2004, the board adopted several changes to the structure of the Unit 3 elk hunt. The DE322 rifle hunt, which had encompassed the entire month of October, was split into 2 separate drawing permit hunts, each 2 weeks long. The board also authorized a late season registration elk hunt (RE325) in Unit 3, which allows permit holders to harvest bull elk within the boundaries of the drawing hunt area during the last 2 weeks of November. Due to concerns about declining harvest and success rates, the department reduced the number of drawing permits to 125 in 2007.

The current Unit 3 elk hunt area includes Etolin Island and a collection of small islands to the south. The state presently offers 3 drawing elk hunts (DE318, DE321, and DE323) and issues a total of 125 drawing permits annually. A late season state registration hunt is also offered, with an average of 54 permits issued annually over the last 10 seasons. Both resident and nonresident hunters are eligible to obtain drawing and registration permits for Unit 3 elk. However, of the 53 elk permits issued to nonresident hunters between 2012 and 2021, only 15 reported hunting and only one was successful. Between 2012 and 2021 an average of 179 elk permits were issued for

Unit 3 elk (Table 20-1). Of the permitted hunters during this period an average of 41% reported that they had hunted, ranging from 31% in 2015 to 47%. in 2019.

During the first 10 elk seasons on Etolin Island an average of eight bulls were harvested annually, ranging from one to 14 bulls (Figure 20-1). Over the last 10 seasons harvest has stabilized and an average of 6 elk were harvested annually, ranging from 4 in 2013 to 9 in 2017. Most elk during this period were harvested under the first unrestricted weapons drawing hunt in October (DE321). Archery hunters harvested an average of one elk during the September bow and arrow only draw hunt, and registration permitted hunters also harvested an average of one elk during the two-week November season. Hunter success over the last 10 seasons averages 8%, ranging from 5% in 2013 to 12% in 2015.

Abundance and composition of elk populations cannot be reliably monitored in the dense coastal rainforest of Unit 3 and no data are available to make meaningful elk population composition estimates for Etolin Island. However, recent aerial surveys combined with anecdotal reports suggest low productivity and recruitment in the Etolin Island elk herd. In July of 2020 a total of 43 cows and only 2 calves were observed during a flight over open alpine habitat on the island. During a survey by department staff in early June 2022 a total of 12 cow elk and no calves were observed and member of the public reported seeing a total of 26 cows, 1 calf, and 2 bulls in late August.

In 2020 the Federal Subsistence Board determined that rural residents of Units 1–5 have customary and traditional use of elk on federal lands in Unit 3. Recently proposals have been submitted to the federal board to establish federal subsistence elk hunts in Unit 3. During the April 2022 Federal Subsistence Board (FSB) meeting the FSB adopted a proposal creating a federal general season for elk outside of Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands in Unit 3.

Table 20-1. Unit 3 elk permits and harvest, 2012-2021.

Reg Year	Total Permits	Permits Hunted	% Permits Hunted	% Hunter Success	Total Harvest
2012	173	72	42	10	7
2013	187	77	41	5	4
2014	184	76	41	7	5
2015	186	57	31	12	7
2016	196	73	37	7	5
2017	174	80	46	11	9
2018	189	86	46	8	7
2019	182	85	47	8	7
2020	166	73	44	7	5
2021	155	58	37	9	5

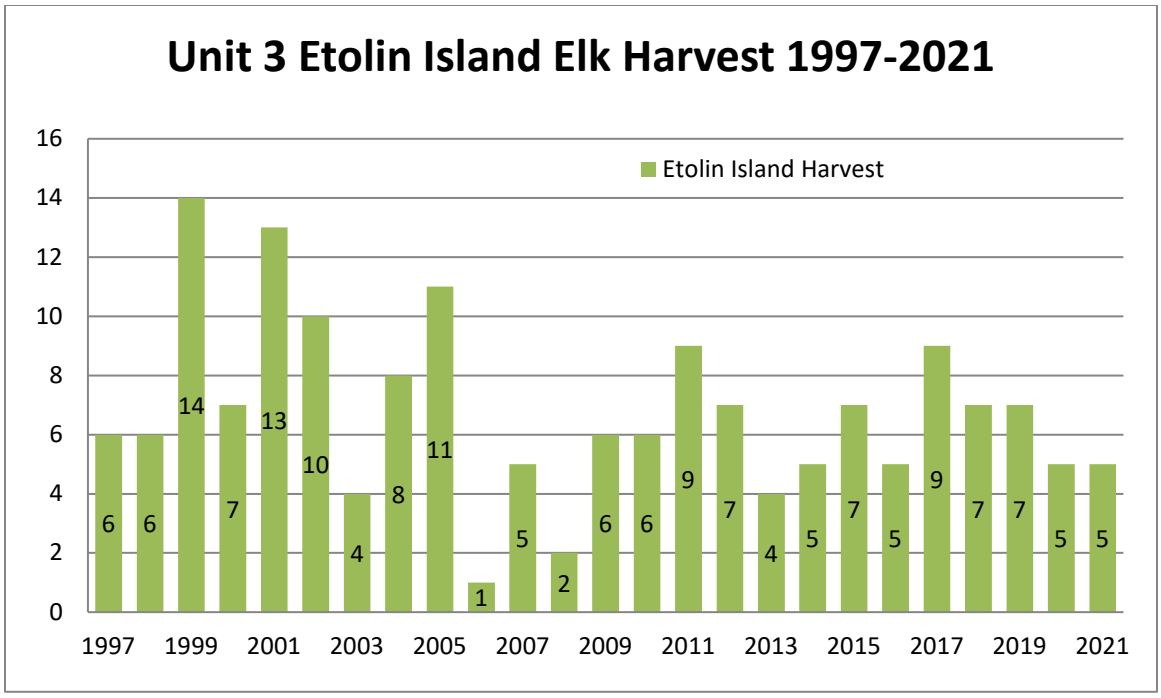

Figure 20-1. Unit 3 Elk harvest, 1997-2021.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because the elk population on Etolin Island is managed as a whole. Distributing the harvest between the northern and southern portions of the island is allocative and does not create biological concerns for the population. The elk can be sustainably managed under the current or proposed regulations.

COST ANALYSIS: Adoption of this proposal would result in additional administrative costs for the department.

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PROPOSAL 21 – 5 AAC 92.150(c). Evidence of sex and identity.

PROPOSED BY: Chris Guggenbickler, Jordan Buness

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the regulation specific to the RM038 registration moose hunt that damaged, broken, or altered antlers are not considered spike-fork moose as defined by 5 AAC 92.990(46)(B).

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.150

(c) … In Unit 1(B), that portion of Unit 1(C) south of Port Hobart, including all Port Houghton drainages, and Unit 3, a damaged, broken, or altered antler is not considered a spike-fork antler as defined in 5 AAC 92.990.

5 AAC 92.990(46)(B)

"spike-fork antlers" means antlers of a bull moose with only one or two tines on at least one antler; male calves are not considered spike-fork bulls; spike-fork bulls can be either spike or fork on both sides, or spike and fork.

Units 1B and 3 have a positive C&T finding for moose, with an ANS of 40 moose. Unit 1C outside the Juneau Nonsubsistence Area also has a positive C&T finding for moose, with an ANS of 25-30.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Harvested bull moose with naturally or intentionally broken antlers would again meet the definition of spike or fork antlers and be legal for RM038 hunters to retain. Because it is difficult to distinguish between naturally and intentionally broken antlers, antlers of any bull moose could be modified to comply with the definition of a spike or fork antler and any bull moose would become vulnerable to harvest.

BACKGROUND: Antler restrictions protect a portion of the bull population by allowing hunters to select younger and older bulls. This strategy allows for maximum hunt participation while at the same time protects a sufficient number of bulls for breeding.

Because aerial surveys cannot be used to estimate abundance or composition of moose populations in the densely forested habitats of central Southeast Alaska, managers rely on antler restrictions to ensure the annual harvest remains sustainable. The current state antler restrictions for moose in the RM038 hunt are among the most liberal in the state. The liberal antler restrictions, combined with a month-long season that encompasses the rut, affords hunters considerable opportunity to harvest a moose.

In 2006, the board adopted a joint Alaska Wildlife Troopers (AWT) and ADF&G proposal addressing the issue of moose antlers being intentionally altered to conform to the existing antler restrictions. As a result of the board's action, a "damaged, broken, or altered antler" was no longer considered a spike-fork antler in Units 1-5. While the board's initial action applied the "damaged, broken or altered antler" regulation to all antler-restricted moose hunts within Units 1-5, the regulation was later rescinded for areas outside of the RM038 hunt area.

The "damaged, broken or altered" antler regulation was deemed necessary to clarify the existing antler restrictions for moose in the RM038 moose hunt, and to exclude from harvest those bulls with antlers that only satisfy the antler point requirements as a result of either naturally occurring breaks or man-made modifications. Prior to implementation of the "damaged, broken or altered" antler regulation, bulls were being harvested with broken antlers, or antlers were being modified after harvest to conform to the point requirements specified in the spike-fork provision of the existing regulations. Such antler modifications circumvented the intent of the antler restrictions, compromised the selective harvest strategy, and posed a potential threat to the future productivity

of the herd. Between 2012 and 2021, 8% of the RM038 harvest did not meet the required antler restrictions, ranging from 5 to 12 bulls. Of the bulls that did not meet the required antler restrictions during this period, 26% did not qualify as spike-forks due to damaged, broken or altered antlers, ranging from 0 to 4 bulls (Figure 21-1).

Under the current antler restrictions moose harvest has increased (Figure 21-2) and Unit 3 hunters are enjoying the greatest success since the RM038 hunt was established in 1995 (Figure 21-3.

The Federal Subsistence Board has determined that rural residents of Units 1–5 have customary and traditional use of moose on federal lands in Unit 1 and Unit 3. Recent Federal Subsistence Board proposals have been submitted to establish federal subsistence moose hunts in Unit 3. In April 2022 the Federal Subsistence Board considered a proposal that would have established a federal drawing permit hunt for the take of up to 20 any bull moose on federally managed lands on Kupreanof and Kuiu islands in Unit 3. This proposal was not adopted. However, future proposals could establish federal subsistence hunts that would result in moose harvest outside of state regulations.

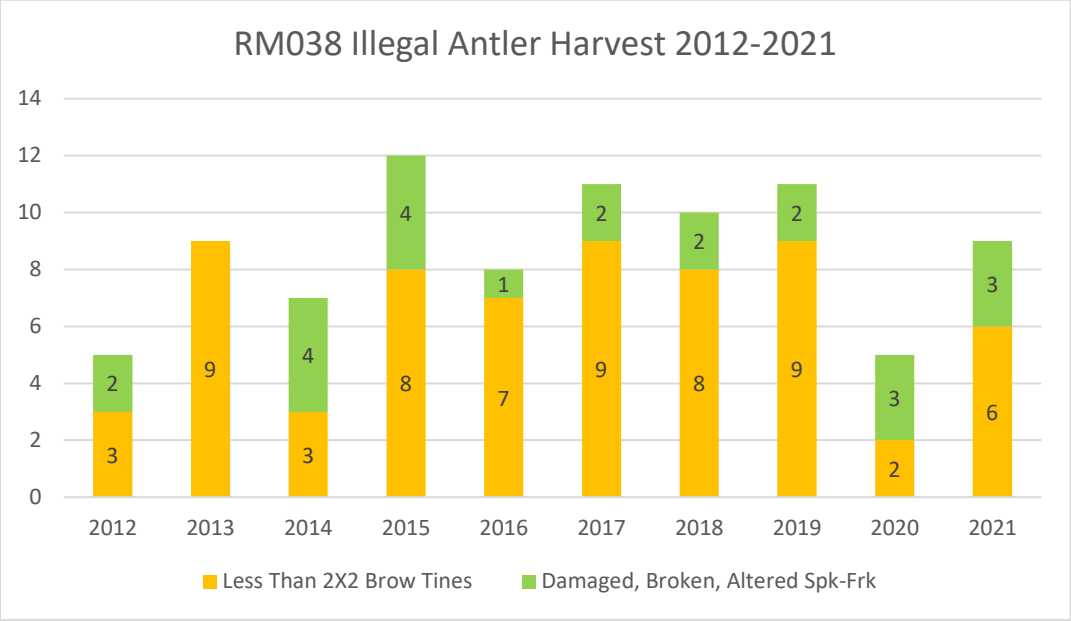

Figure 21-1. Harvest that did not meet the RM038 antler restrictions, 2012-2021.

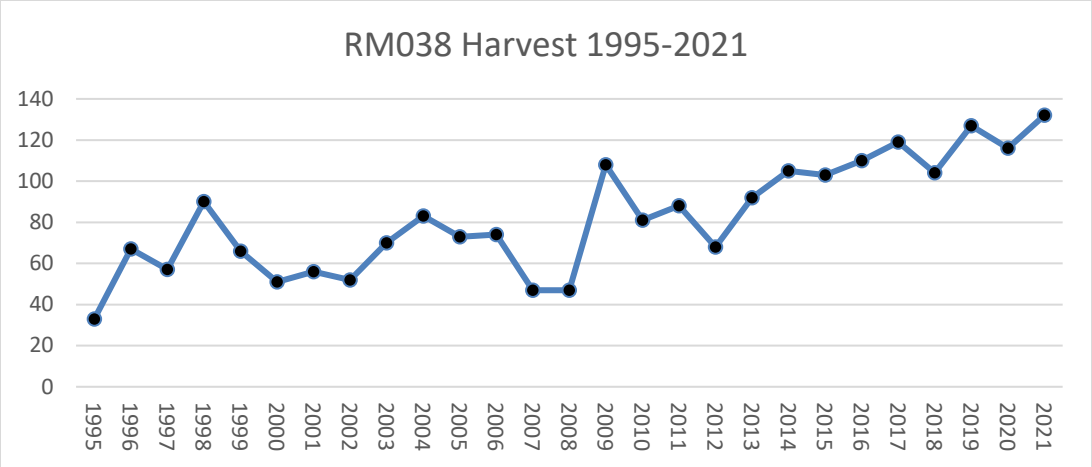

Figure 21-2. RM038 moose harvest, 1995-2021.

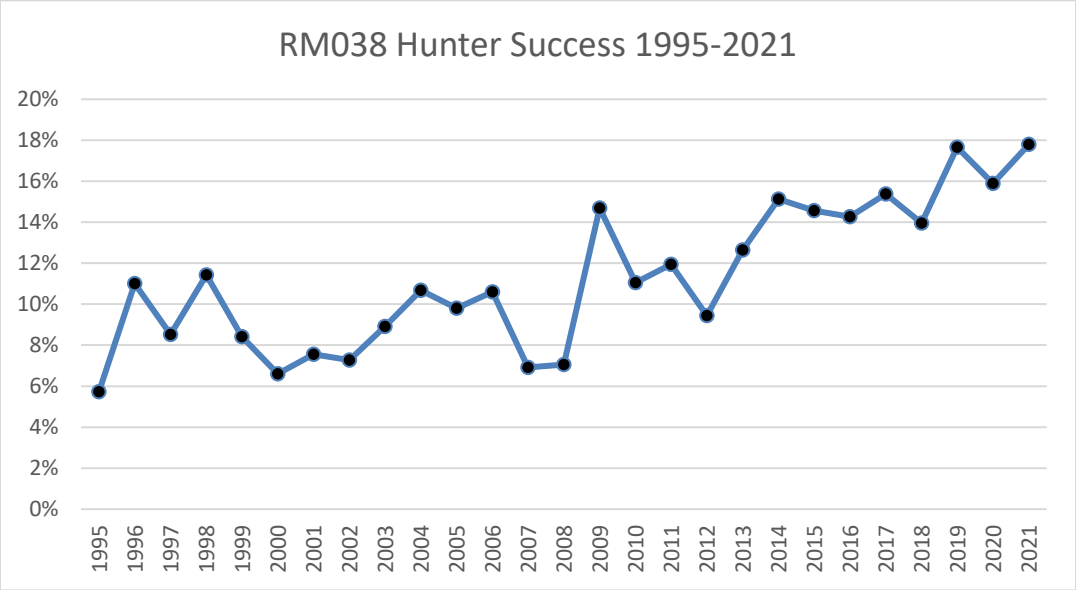

Figure 21-3. RM038 hunter success, 1995–2021.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. As noted in Figure 21-2, RM038 moose harvest has steadily increased, providing both continued hunting opportunity and also good odds of success. This change would likely increase harvest that may result in a decline of available bull moose. Adoption of this proposal could result in bull:cow ratios falling below the management objective of 25 bulls per 100 cows. Moose in the RM038 hunt area cannot be surveyed so it is difficult to assess impacts on the population and as a result conservative management is warranted.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

****

PROPOSAL 22 – 5 AAC 92.052. Discretionary permit hunt conditions and procedures.

PROPOSED BY: Kris Thynes, Cody Ledoux, Faith Nelson, Mark Hofstad, Austin Sollars, Steve Nelson, Sidney Nelson.

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the motorized vehicle restriction as a condition of the RM038 moose hunt in Unit 1B.

WHAT ARE THE CURRENT REGULATIONS? Hunting with the use of a motorized land vehicle is prohibited in Unit 1B, except to retrieve moose, establish camps, or check boats as a condition of the RM038 registration moose hunt.

There is a positive C&T finding for moose in units 1B and 3, with a combined ANS of 40 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal would not likely impact the moose harvest in Unit 1B (specifically the Thomas Bay road network area). Hunter effort and harvest has significantly decreased since adoption of the motorized restrictions and safety concerns have lessened.

BACKGROUND:

Timeline

1977 – Last year of general moose hunt with no vehicle restrictions.

1978 – First year of vehicle restriction under methods and means regulation:

5 AAC 81.070(a)(8) "In Game Management Unit 1(B), except the Stikine River drainage, the use of motorized land vehicles is prohibited for the hunting of, or transportation involved in hunting moose; however, such vehicles may be used to retrieve moose after 12:00 noon."

1984 – First year a registration permit was required to hunt moose in Unit 1B. Vehicle restrictions continued to be listed under methods and means regulation 5 AAC 81.070(a)(8).

1985 – The specific vehicle restriction was removed from 5 AAC 81.070(a)(8), but the motorized restriction continued under **5 AAC 92.052 Discretionary Permit Hunt Conditions and Procedures** and continues to date.

Between 1958 and 1975 logging in the Thomas Bay area of Unit 1B resulted in improved moose hunting opportunities. Logging activities increased moose browse and new roads provided better hunting access. Residents of Petersburg became aware of the increase in moose and more hunters were attracted to the area each year. Because of public safety concerns related to the relatively short lengths of available road, and increasing hunter concentrations, motorized vehicle use was restricted starting in 1978. Initially this was done by methods and means regulations. Later the department regulated vehicle use in Thomas Bay as a condition of the required registration permit.

There have been notable changes in both moose habitat and harvest in the 44 years since the first motorized vehicle restriction was instituted in Unit 1B. Moose populations around Thomas Bay responded favorably to the initial increase in available browse resulting from past clearcut logging. In the intervening years, dense closed-canopy forests of second growth timber have reduced available understory browse, and the annual moose harvest has declined. The highest reported harvests occurred during the twelve years between 1987 and 1998, averaging 19 moose, with the harvest equaling or exceeding 20 moose during seven of those years (Figure 22-1). However, the average moose harvest has declined to five in the Thomas Bay road network area over the last 10 seasons, and only three bulls were harvested during each of the past two seasons.

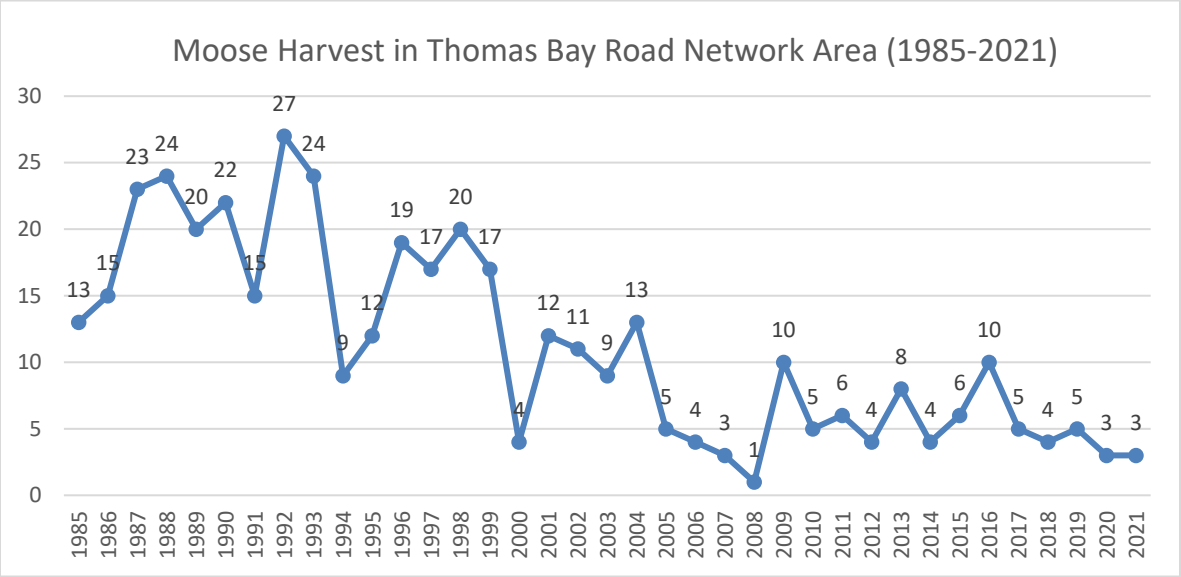

Figure 22-1. Moose harvest in the Thomas Bay road network area, 1985–2021.

Many of the roads that were constructed in conjunction with logging have deteriorated over time, are overgrown and unpassable by highway vehicles. There are currently about 25 miles of mainline roads, and 6 miles of spur roads in the Thomas Bay road network.

When the idea of removing the motorized vehicle restriction was broached at the Petersburg Fish and Game Advisory Committee meeting some greatly favored removing the restriction and others greatly favored keeping the restriction in place.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal because it is primarily allocative. The department has no conservation concerns with the adoption of this proposal. Board action is not required for this proposal because this restriction is a department permit condition that can be administratively removed. However, while the department has the ability to remove this long-standing motorized restriction using its discretionary authority, the issue is allocative in nature and as such warrants a proposal to the board.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

****

PROPOSAL 23 – 5 AAC 92.052. Discretionary permit hunt conditions and procedures.

PROPOSED BY: Kris Thynes

WHAT WOULD THE PROPOSAL DO? This proposal would allow the use of electric bicycles of 750 watts or less in Unit 1B during the RM038 moose hunt.

While not explicitly said, if adopted, this proposal will only affect the Thomas Bay road system.

WHAT ARE THE CURRENT REGULATIONS? Hunting with the use of a motorized land vehicle is prohibited in Unit 1B, except to retrieve moose, establish camps, or check boats as a condition of the RM038 registration moose hunt.

There is a positive C&T finding for moose in units 1B and 3, and a combined ANS of 40 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal would not likely impact the moose harvest in Unit 1B (specifically the Thomas Bay road network area). Hunter effort and harvest has significantly decreased since adoption of the motorized restrictions and safety concerns have lessened.

BACKGROUND:

Timeline

1977 – Last year of general moose hunt with no vehicle restrictions.

1978 – First year of vehicle restriction under methods and means regulation:

5 AAC 81.070(a)(8) "In Game Management Unit 1(B), except the Stikine River drainage, the use of motorized land vehicles is prohibited for the hunting of, or transportation involved in hunting moose; however, such vehicles may be used to retrieve moose after 12:00 noon."

1984 – First year a registration permit was required to hunt moose in Unit 1B. Vehicle restrictions continued to be listed under methods and means regulation 5 AAC 81.070(a)(8).

1985 – The specific vehicle restriction was removed from 5 AAC 81.070(a)(8), but the motorized restriction continued under **5 AAC 92.052 Discretionary Permit Hunt Conditions and Procedures** and continues to date.

Between 1958 and 1975 logging in the Thomas Bay area of Unit 1B resulted in improved moose hunting opportunities. Logging activities increased moose browse and new roads provided better hunting access. Residents of Petersburg became aware of the increase in moose and more hunters were attracted to the area each year. Because of public safety concerns related to the relatively short lengths of available road, and increasing hunter concentrations, motorized vehicle use was

restricted starting in 1978. Initially this was done by methods and means regulations. Later the department regulated vehicle use in Thomas Bay as a condition of the required registration permit.

There have been notable changes in both moose habitat and harvest in the 44 years since the first motorized vehicle restriction was instituted in Unit 1B. Moose populations around Thomas Bay responded favorably to the initial increase in available browse resulting from past clearcut logging. In the intervening years, dense closed-canopy forests of second growth timber have reduced available understory browse and the annual moose harvest has declined. The highest reported harvests occurred during the twelve years between 1987 and 1998, averaging 19 moose, with the harvest equaling or exceeding 20 moose during seven of those years (Figure 23-1). However, the average moose harvest has declined to five in the Thomas Bay road network area over the last 10 seasons, and only three bulls were harvested during each of the past two seasons.

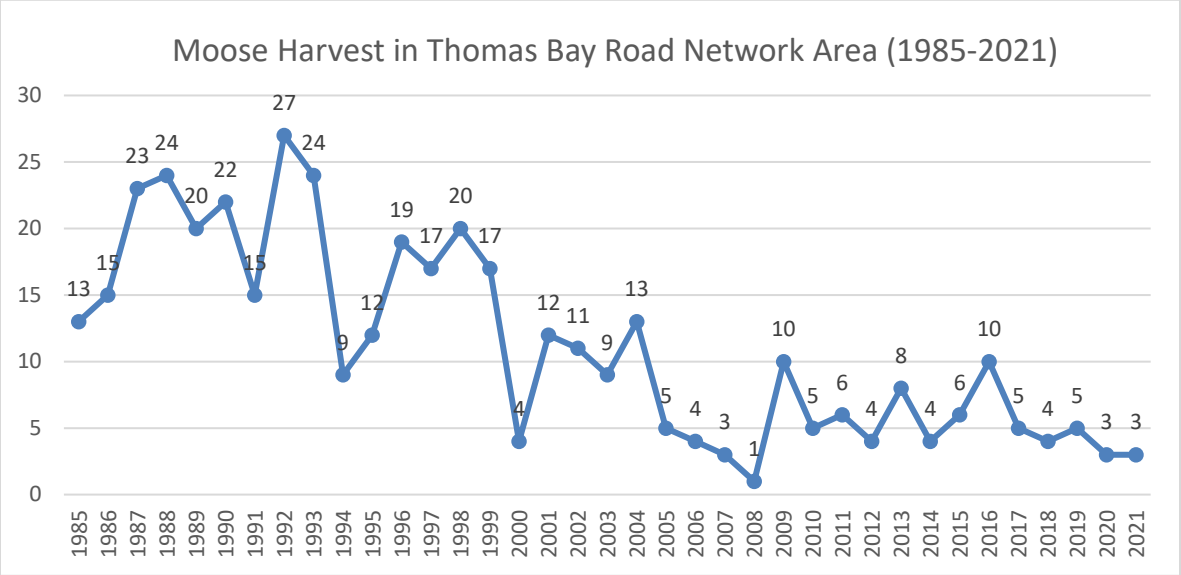

Figure 23-1. Moose harvest in the Thomas Bay road network area, 1985–2021.

Many of the roads that were constructed in conjunction with logging have deteriorated over time, are overgrown and unpassable by highway vehicles. There are currently about 25 miles of mainline roads, and 6 miles of spur roads in the Thomas Bay road network.

When the idea of removing the motorized vehicle restriction was broached at the Petersburg Fish and Game Advisory Committee meeting some greatly favored removing the restriction and others greatly favored keeping the restriction in place.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal because it is primarily allocative. The department has no conservation concerns with the adoption of this proposal. E-bikes are currently considered motorized vehicles under state hunting regulations, regardless of wattage, and there are no existing hunting regulations for E-bikes: this would be a first. The department does not know if the wattage requirement will create enforcement concerns. Board action is not required for this proposal because this restriction is a department permit

condition that can be administratively removed. . However, while the department has the ability to remove this long-standing motorized restriction using its discretionary authority, the issue is allocative in nature and as such warrants a proposal to the board.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

****

PROPOSAL 24 – 5 AAC 85.015, 92.510(a)(5)(C). Areas closed to hunting.

PROPOSED BY: Kalib Baird

WHAT WOULD THE PROPOSAL DO? This proposal would create a registration archery black bear hunt in the Petersburg Creek Closed Area (Figure 24-1), open to residents only, with up to 10 permits available.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.510. Areas closed to hunting.

(a) The following areas are closed to hunting as specified:

…

(5) Unit 3

…

(C) the Petersburg Creek drainage on Kupreanof Island is closed to the taking of black bears;

Unit 3 Remainder

Residency	**Hunts**	**Season**
Residents	GL000	Sept 1–June 30
Guided Nonresidents	GL000	Sept 1–June 30
Nonguided Nonresidents	DL029, DL030, GL000	Sept 1–June 30

The bag limit for residents in Unit 3 is two bears, but not more than one may be a blue or glacier bear. The bag limit for nonresidents in Unit 3 is one bear.

There is a positive C&T finding for black bears in Unit 3, with an ANS of 15-20 black bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal

would eliminate the Petersburg Creek Closed Area by opening black bear hunting in the Petersburg Creek drainage by limited availability registration permit. The hunt would be open to resident hunters only, and to certified bowhunters only. Adoption of this proposal may result in user conflicts since this area is popular for sport fishing and wildlife viewing during the spring and fall.

BACKGROUND: The Petersburg Creek drainage (known as the Petersburg Creek Closed Area) is 115 square kilometers (44 sq. mi.) in size and represents roughly 1.5% of the total Unit 3 area. The closed area is located on Kupreanof Island directly across the Wrangell Narrows from the town of Petersburg and has been closed to the taking of black bears since 1975. It is a popular public recreation area, and possible explanations for its creation include concerns about public safety and providing Petersburg residents with a nearby bear viewing area.

In 2004 the board conducted a statewide review of all closed and controlled use areas to ascertain the continued need for each area. On completion of this review the status of the Petersburg Creek Closed Area was unchanged.

The allowable harvest of black bears on Kupreanof Island is 80. Over the last five seasons an average of 69 bears have been harvested on the island, ranging from 38 in regulatory year 2019, when much of the season was closed to nonresidents due to COVID-19, to 90 bears in 2018 (Table 24-1).

Table 24-1. Kupreanof Island black bear harvest, 2017–2021.

Year	Harvest	Harvestable Surplus	Post Hunt Surplus
2017	83	80	-3
2018	90	80	-10
2019	38	80	42
2020	71	80	9
2021	65	80	15

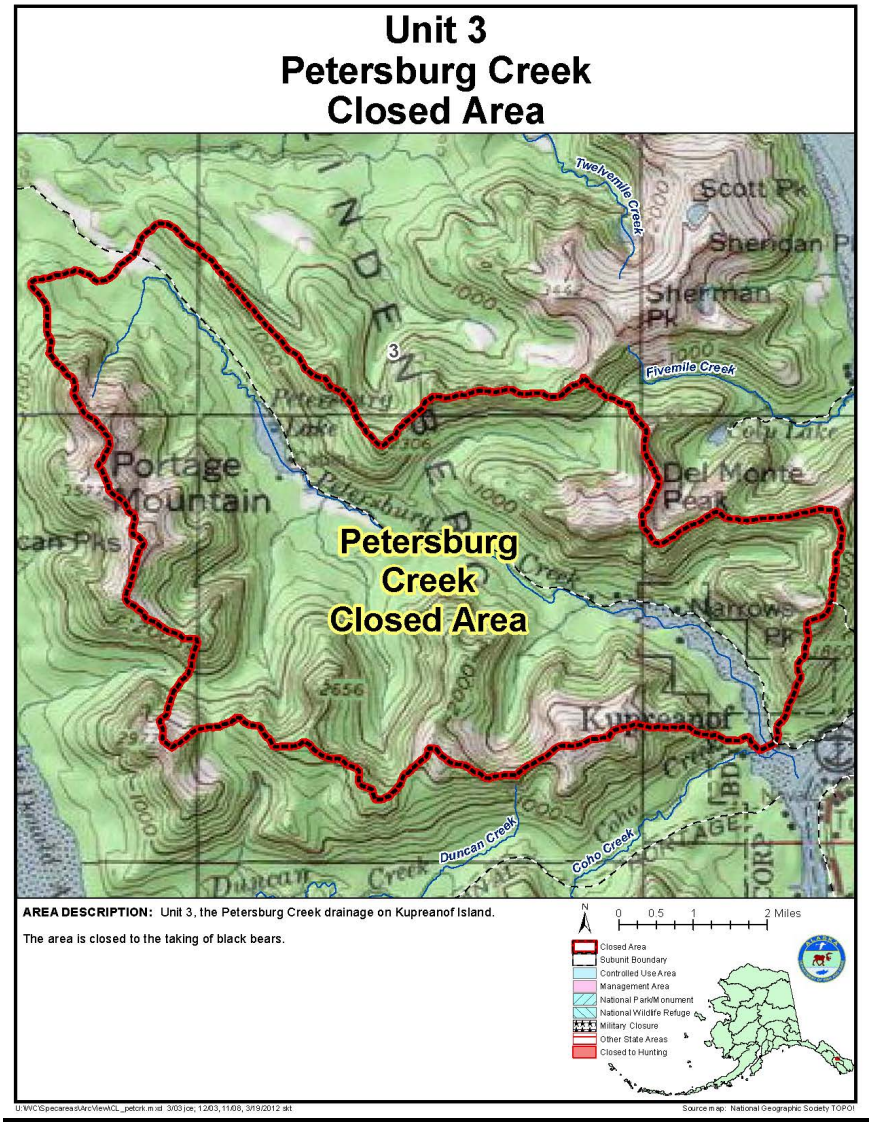

Figure 24-1. Map of Petersburg Creek Closed Area.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is primarily allocative and there is no biological concern for additional black bear harvest on Kupreanof Island. The department will monitor the overall black bear harvest to ensure the harvestable surplus is not exceeded. As written, only resident black bear hunters would be eligible to participate in the hunt; this is an allocative issue between user groups.

Because of its proximity to Petersburg and ease of access, Petersburg Creek is very popular with sport fishermen, hikers, and wildlife viewers. Spring steelhead trout and fall sockeye and coho salmon runs coincide with the peak of Unit 3 spring and fall black bear hunting seasons. Hunting in the area when sport fishing and wildlife viewing activities are high could result in user conflicts and public safety concerns.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

****

PROPOSAL 25 – 5 AAC 85.015, 92.510(a)(5)(C). Areas closed to hunting.

PROPOSED BY: Max Worhatch

WHAT WOULD THE PROPOSAL DO? This proposal would allow the hunting of black bears in the Petersburg Creek Closed Area (Figure 25-1).

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.510. Areas closed to hunting.

(a) The following areas are closed to hunting as specified:

…

(5) Unit 3

…

(C) the Petersburg Creek drainage on Kupreanof Island is closed to the taking of black bears;

Unit 3 Remainder

Residency	Hunts	Season
Residents	GL000	Sept 1–June 30
Guided Nonresidents	GL000	Sept 1–June 30
Nonguided Nonresidents	DL029, DL030, GL000	Sept 1–June 30

The bag limit for residents in Unit 3 is two bears, but not more than one may be a blue or glacier bear. The bag limit for nonresidents in Unit 3 is one bear.

There is a positive C&T use finding for black bears in Unit 3, with an ANS of 15-20 black bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would open black bear hunting in the Petersburg Creek drainage to resident and nonresident hunters, effectively eliminating the Petersburg Creek Closed Area. This will likely result in increased black bear hunting pressure and harvest on Kupreanof Island. Most of the black bear harvest in Unit 3 is by nonguided nonresident hunters. There are several lodges in the vicinity of Petersburg Creek that host nonguided nonresident black bear hunters. If adopted, nonguided nonresident hunters would gain access to black bear hunting in the drainage. Adoption of this

proposal would likely result in increased user conflicts since this area is popular for sport fishing and wildlife viewing.

BACKGROUND: The Petersburg Creek drainage (known as the Petersburg Creek Closed Area) is 115 square kilometers (44 sq. mi.) in size, and represents roughly 1.5 percent of the total Unit 3 area. The closed area is located on Kupreanof Island directly across the Wrangell Narrows from the town of Petersburg and has been closed to the taking of black bears since 1975. It is a popular public recreation area, and possible explanations for its creation include concerns about public safety and providing Petersburg residents with a nearby bear viewing area.

In 2004 the board conducted a statewide review of all closed and controlled use areas to ascertain the continued need for each area. On completion of this review the status of the Petersburg Creek Closed Area was unchanged.

The allowable harvest of black bears on Kupreanof Island is 80. Over the last five seasons an average of 69 bears have been harvested on the island, ranging from 38 in regulatory year 2019 when much of the season was closed to nonresidents due to COVID-19 to 90 bears in 2018 (Table 25-1).

Table 25-1. Kupreanof Island black bear harvest, 2017–2021.

Year	Harvest	Harvestable Surplus	Post Hunt Surplus
2017	83	80	-3
2018	90	80	-10
2019	38	80	42
2020	71	80	9
2021	65	80	15

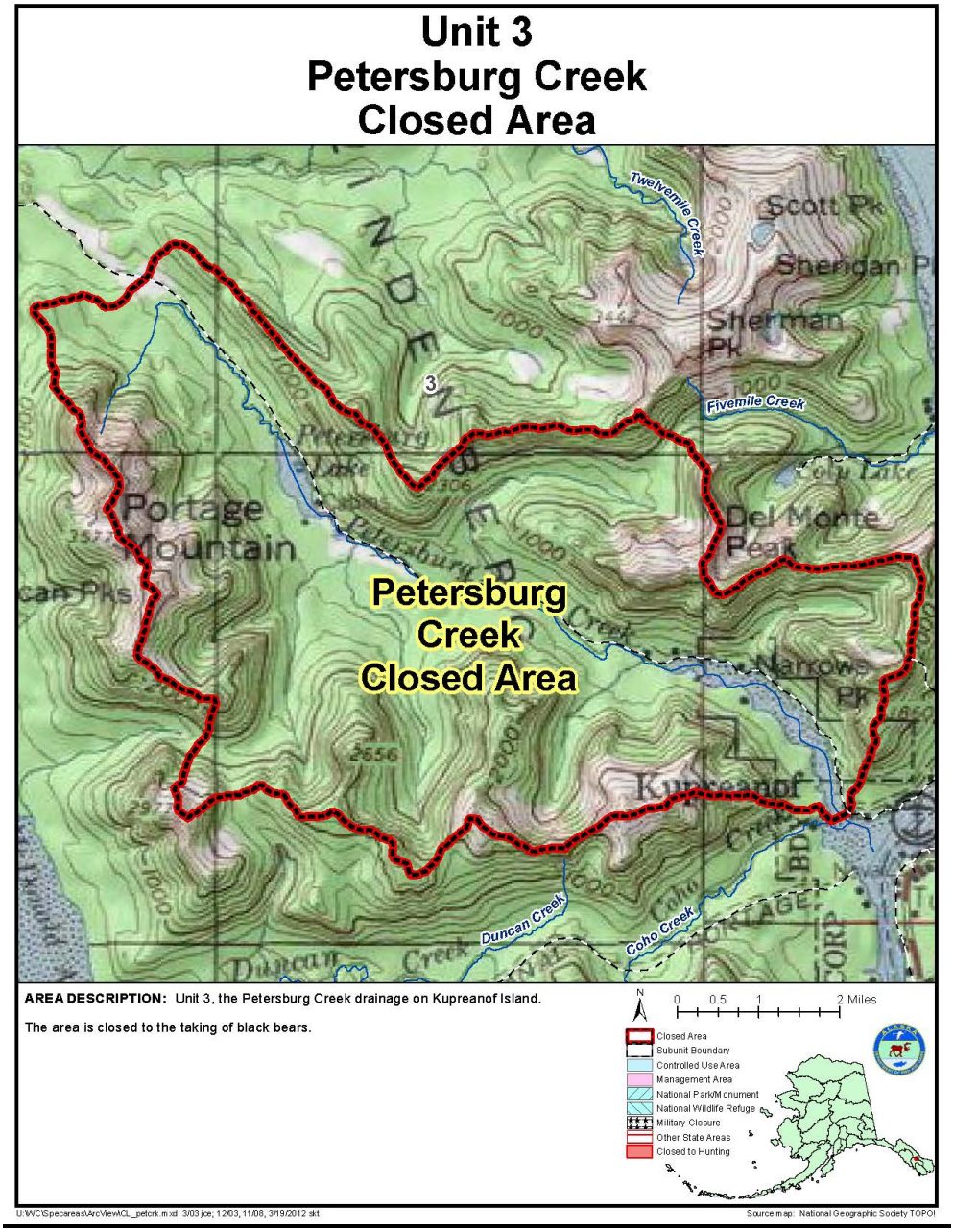

Figure 25-1. Map of Petersburg Creek Closed Area.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because the proposal is primarily allocative and there is no biological concern for additional black bear harvest on Kupreanof Island. The department will monitor the overall black bear harvest to ensure the harvestable surplus is not exceeded. This is an allocative issue between user groups.

Because of its proximity to Petersburg and ease of access, Petersburg Creek is very popular with sport fishermen, hikers, and wildlife viewers. Spring steelhead trout and fall sockeye and coho salmon runs coincide with the peak of Unit 3 spring and fall black bear hunting seasons. Hunting

in the area when sport fishing and wildlife viewing activities are high could result in user conflicts and public safety concerns.

The proposal clearly asks for the same season dates as the rest of Unit 3 but does not address the bag limit. If the board adopts this proposal the department asks the board to adopt the existing bag limits for residents and nonresidents in order to keep the regulations as simple and easy to follow as possible.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 26 – 5 AAC 85.015 Hunting seasons and bag limits for black bear.

PROPOSED BY: Todd Boughner

WHAT WOULD THE PROPOSAL DO? L

This proposal would reduce the number of draw permits available to nonguided nonresident black bear hunters on Kuiu Island and would limit the nonresident harvest of black bears on Kuiu Island to one black bear every four regulatory years.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	**Resident Open Season (Subsistence and General Hunts)**	**Nonresident Open Season**
Unit 3, Kuiu Island		
RESIDENT HUNTERS: 2 bears, not more than 1 of which may be a blue or glacier bear	Sept. 1 –June 30 (General hunt only)	
NONRESIDENT HUNTERS WITH REGISTERED GUIDE OR RESIDENT RELATIVE WITHIN THE SECOND-DEGREE OF KINDRED: 1 bear, the season will be closed by emergency order		Sept. 1 – June 30

when the harvest guideline has been reached	
NONRESIDENT HUNTERS WITHOUT REGISTERED GUIDE OR RESIDENT RELATIVE WITHIN THE SECOND-DEGREE OF KINDRED: 1 bear by drawing permit only; up to 75 permits may be issued; the season will be closed by emergency order when the harvest guideline has been reached	Sept. 1 – June 30

There is a positive C&T finding for black bears in Unit 3, with an ANS of 15 – 20 black bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted hunting opportunity for unguided nonresident black bear hunters would be reduced on Kuiu Island and total Kuiu Island black bear harvest could also decrease.

BACKGROUND: Kuiu Island accounts for 25% of the Unit 3 land area but produced about 50% of the unit-wide black bear harvest from 2012 to 2021. Kuiu Island male skull sizes are larger on average than those from any other area of the state except Prince of Wales Island in Unit 2. Compared to other Unit 3 islands, Kuiu Island has a relatively high number of salmon streams and more shoreline miles per square mile than other local islands. These characteristics provide for a very productive bear population, while also providing shoreline hunting opportunities for boat-based spring bear hunters. Roads associated with logging also provide easy access to the north end of Kuiu, where the highest harvest occurs.

At its fall 2010 meeting in Ketchikan, the board adopted a proposal requiring non-resident black bear hunters who do not enlist the services of a registered hunting guide to obtain a drawing permit prior to hunting black bears in Units 1−3. Implementation of the new regulation was delayed until fall 2012 to allow guides time to adjust and the department time to implement the new drawing permit requirement for nonresident black bear hunters without a guide.

Based on the department's estimates of sustainable harvest levels, the board established the number of drawing permits available to unguided nonresident hunters on Kuiu Island at 40 permits. To provide the department with some flexibility regarding the exact number of drawing permits to be issued, the board authorized the department to issue "up to" a maximum of 50 drawing permits (DL029) annually on Kuiu Island.

From 2012 to 2016 the department offered 40 drawing permits annually for nonresident black bear hunters without a guide on Kuiu Island. After five years, the department evaluated hunt statistics associated with the drawing permit requirement, including the level of hunter participation, effort, success rate, and total harvest of black bears taken annually on the island. Based on hunt data obtained during the initial five years the department increased the number of drawing permits available to unguided nonresidents on Kuiu Island to the maximum allowable 50 permits, beginning with the fall 2017 season.

In 2019 the board adopted a department proposal to increase the number of permits that may be issued to nonresident black bear hunters without a guide on Kuiu Island from 50 to 75 permits annually in order to provide additional hunting opportunity should the harvestable surplus of bears increase on the island. To date the department has not increased the number of nonresident drawing permits beyond the 50-permit level. Also in 2019 the board adopted a proposal to allow nonresident hunters accompanied by resident relatives within the second-degree of kindred to hunt under a general season harvest ticket, therefore removing the requirement for them to have a drawing permit.

A current population estimate is not available for black bears on Kuiu Island. However, information gained from sealing records, including skull sizes, average ages, and sex ratios, provide an indirect measure of black bear population trends.

Since 2017 a total of 50 draw permits (DL029) have been issued annually to nonresident black bear hunters hunting without a guide on Kuiu Island (Table 26-1). An average of 26 black bears were harvested by DL029 hunters over the last 5 seasons, with hunter success averaging 87%.

Males make up roughly 80% of the annual Kuiu Island black bear harvest. A Unit 3 black bear management objective is to maintain an average annual male skull size of at least 18.5 inches. Black bears harvested on Kuiu Island have met the objective 6 of the last 10 seasons. While overall hunter success remains high for Kuiu Island black bear hunters, the number of bears with skull sizes ≥ 20 inches has declined over the last decade (Table 26-2). During the decade 1990–1999, 14.2% of the male black bears harvested on Kuiu had skull sizes ≥ 20 inches. This declined to 9.4% during 2010–2019

Table 26-1. DL029 black bear harvest data, 2012–2021.

Year	Permits	Hunted	Harvested	% Success
2012	40	28	15	54
2013	40	29	12	41
2014	40	22	11	50
2015	40	24	12	50

2016	40	26	18	69
2017	50	30	26	87
2018	50	44	39	89
2019[1]	50	8	8	100
2020	50	36	32	89
2021	50	31	24	77

[1] In 2019 the nonresident spring black bear season was closed from April 2 – May 31 due to COVID-19.

Table 26-2. Harvest of Kuiu Island bears equaling or exceeding 20" skulls by decade (1990–2019).

Years	≥ 20"	≥ 21"	n	% ≥ 20"	% ≥ 21"	Avg Skull	Avg Age
1990-1999	132	13	929	14.2	1.4	18.56	-
2000-2009	117	4	909	12.9	0.4	18.62	8
2010-2019	56	3	596	9.4	0.5	18.43	7.5

The average age of male black bears harvested on Kuiu Island is on a slightly decreasing trend over the last 20 years (Figure 26-1). Between 2000 and 2009 the average age of males was 8 years-old, ranging from 7.1 in 2000 to 9.2 years old in 2009. During the following decade (2010–2019) male black bears averaged 7.5 years-old, ranging from 6.5 in 2015 to 8.5 years old in 2012.

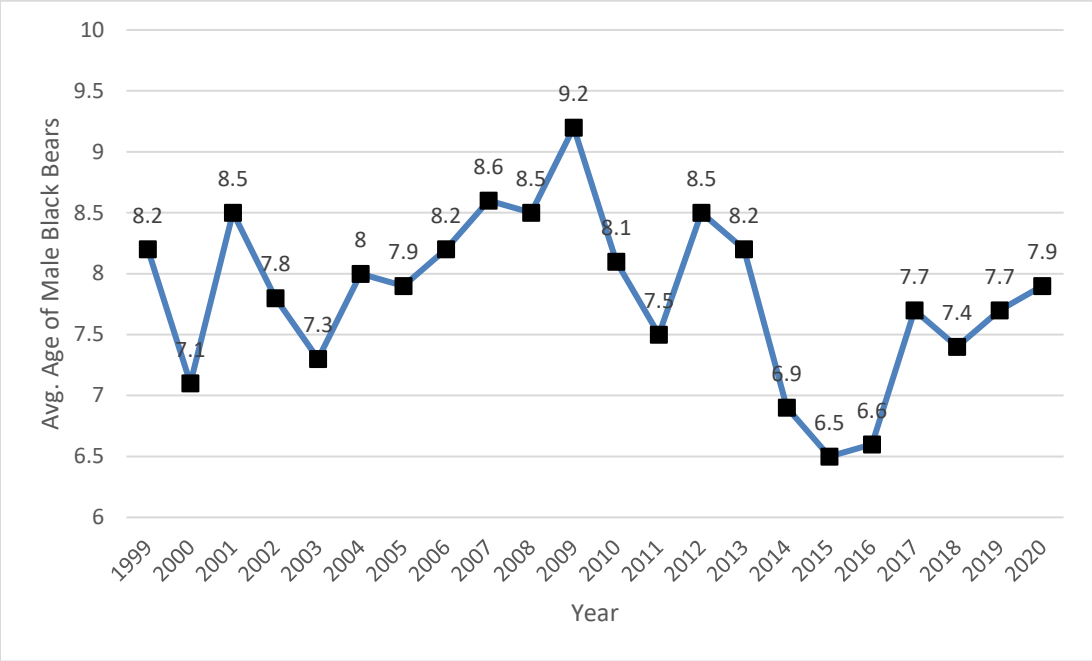

Figure 26-1. Kuiu Island age of male black bears harvested, 1999-2020.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is primarily allocative in nature and the proposal does not create biological concerns for the black

bear populations on Kuiu or Kupreanof Islands, which can be sustainably managed under the current or the proposed regulations.

Due to the relative decrease in number of large black bears (≥ 20 inch skull size), the department has been exploring the idea of lowering nonresident drawing permits (DL029 and DL030) by 10-20% through the department's discretionary permit authority. Local staff have discussed the issue with the Petersburg Fish and Game Advisory Committee and received positive support. The number of guided black bear hunters in Unit 3 are dictated by hunts, through commercial use permits issued by the US Forest Service, and therefore would not be affected by this action.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

****

PROPOSAL 27 – 5 AAC 92.550. Areas closed to trapping.

PROPOSED BY: Tyler Riberio

WHAT WOULD THE PROPOSAL DO? This proposal would prohibit trapping within a 100-yard buffer along all established hiking trails and drivable surfaces on Wrangell Island.

WHAT ARE THE CURRENT REGULATIONS? The current furbearer trapping regulations for Unit 3 can be found in 5 AAC 84.270.

There are currently no regulations on placing traps in Alaska; however, the *Alaska Trapping Regulation booklet* encourages trappers to "act responsibly as a trapper and conservationist by trapping in ways to minimize conflict between trapping and other users, for example, avoid high recreational use areas. Avoid situations where you might catch a domestic dog or cat, such as near homes or trails frequently used by hikers, skijorers, dog mushers, or other people." The department also developed a *Code of Ethics -A Trapper's Responsibility* in collaboration with the Alaska Trappers Association which emphasizes promoting trapping methods that will reduce the take of nontarget animals.

The following is a list of known hiking trails and drivable surfaces on Wrangell Island. Additional hiking trails and drivable surfaces may be impacted by adoption of this proposal.

Wrangell Island Trails

City and Borough of Wrangell Trails
Mt. Dewey Trail
Volunteer Park Nature Trail

US Forest Service Trails

Rainbow Falls Trail
Institute Creek Trail
North Wrangell Trail
Long Lake Trail
Nemo Saltwater Access Trail
Salamander Ridge Trail
Thoms Lake Trail

Wrangell Island Forest Service Roads

Main Roads	Spur Roads	ATV Trails
Road 6250	Road 50016	Road 226275
Road 6225	Road 50022	Road 226277
Road 6259	Road 50024	Road 226296
Road 6260	Road 50029	Road 2250001
Road 6263	Road 50033	Road 2250002
Road 6265	Road 50035	Road 2250022
Road 6267	Road 50040	Road 2250060
Road 6270	Road 50049	
Road 6271	Road 50050	
Road 6273	Road 50051	
Road 6276	Road 50052	
Road 6299	Road 50053	
	Road 50054	
	Road 50055	
	Road 50060	

Wrangell Island Alaska Department of Transportation Roads and Highways

Zimovia Highway
Ishiyama Drive
Airport Loop Stikine Highway
Shoemaker Loop Road

There is a positive C&T finding for all furbearers in Units 1-5 with an ANS of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would make it illegal to trap within 100 yards of the known 47 federal, state, and borough trails and roads on Wrangell Island. This would result in a decrease in trapping opportunity and harvest of furbearers.

BACKGROUND: There are currently no regulations requiring trapping activity be a certain distance from a trail or trailhead. Ethical and safe trapping practices are actively encouraged and taught throughout the state by the Alaska Trappers Association and the Alaska Frontier Trappers Association.

Many of the trails and roads on Wrangell fall under borough authority and the borough has enacted municipal codes requiring the restraint of pets within the city's business district to minimize user conflicts and for safety. The department does not maintain a record of pets caught in traps and reporting is inconsistent.

The number of furbearers sealed from Wrangell Island is variable year to year, averaging 41 furbearers over the last 10 years, and ranging from 6 to 104 (Table 27-1). Some species are not required to be sealed and there are very few subsistence household survey data points.

Table 27-1. Unit 3 Wrangell area trapper harvest, regulatory years 2011–2020

Reg Year	Beaver	Wolf	Wolverine	Marten	Otter
2011	2	5	1	79	17
2012	11	7	2	42	3
2013	14	6	3	27	6
2014	4	5	0	29	4
2015	1	2	0	1	2
2016	10	5	0	42	4
2017	9	3	1	21	0
2018	1	2	0	14	6
2019	6	6	0	0	1
2020	1	0	0	4	5

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal because it is primarily allocative. The department is generally opposed to a reduction in opportunity where a harvestable surplus exists, and instead encourages trappers to be cognizant of potential conflicts and to follow the trapper's Code of Ethics.

COST ANALYSIS: If adopted, this proposal will result in additional costs to the department by requiring identification of all restricted areas; producing material for the public demonstrating the restricted areas and applicable regulations; and monitoring changes in restricted areas (i.e., new trails, etc.).

****

PROPOSAL 28 – 5 AAC 85.040(a)(1) Hunting seasons and bag limits for goat.

PROPOSED BY: Peter Robertson

WHAT WOULD THE PROPOSAL DO? This proposal would move the boundary of RG014 from the south bank of Little Sheep Creek to the south bank of Sheep Creek. Some hunters have suggested that it is difficult to determine the south bank of Little Sheep Creek at the top of the drainage.

WHAT ARE THE CURRENT REGULATIONS? The current hunt area is Unit 1(C), the mainland portion draining into the south bank of Little Sheep Creek, Gastineau Channel south of Little Sheep Creek, Stephens Passage, and Taku Inlet between the mouth of Little Sheep Creek and Taku Glacier, including the portion between the south side of Blackerby Ridge and the north side of Salmon Creek Reservoir, above the 1,000 foot contour, east along that contour to the north shore of Salmon Creek Reservoir, north of the main drainage into the head of reservoir following that drainage south and east up to the ridgeline and east to Olds Mountain (Figure 28-1).

The current bag limit is 1 goat by registration permit only, by bow and arrow only; the taking of nannies and kids is prohibited.

The RG014 hunt area is within the Juneau Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would slightly increase the area open to archery hunting in RG014 and increase hunter access to goats near Juneau. It would open an area to goat hunting on the Juneau road-system, which has not existed for some time. It would also provide access to goat hunting on the wintering grounds, which also has not occurred for this hunt.

BACKGROUND: Small geographic areas within hunt areas are used to manage mountain goat harvest in Southeast Alaska. Guideline harvest levels (GHLs) are established for each area and are based on the allocation of points determined through aerial surveys (male goat = 1 point, female goat = 2 points) within each area. GHLs are established by allowing the harvest of 6 points per 100 adult goats seen during aerial surveys. Once the harvest has reached the GHL the hunt is closed by emergency order. The harvest of billies is encouraged to increase opportunity to other hunters and ensure the long-term sustainability of the localized populations. Harvest levels within RG014 have been set at 7 goats for the last 5 years.

Hunter participation and harvest of mountain goats is dependent on fall weather and decreases significantly with inclement weather. Normally about 30 permits are issued for RG014, and anywhere from 5 to 21 hunters have hunted since the hunt began in 2014 (Table 28-1). There have been as many as 8 goats harvested in this hunt, but the average is 4 goats.

Mountain goat aerial surveys have occurred irregularly because of inclement survey weather and other survey priorities (Table 28-2). The survey area (the mainland between the Mendenhall

Glacier and Taku Glacier) includes the RG014 archery area (Figure 28-1) as well as several non-hunt goat viewing areas. It also includes the small area in question in this proposal, but because of the small size of the land area in this proposal, goats are rarely counted in the proposed area during surveys.

Table 28-1. Number of permits issued, hunters, and harvest for RG014 in RY14–21.

Regulatory Year	RG014 Permits	Hunted	Harvested
2014	11	11	3
2015	13	5	2
2016	33	24	8
2017	31	18	4
2018	24	21	6
2019	21	12	4
2020	38	23	4
2021	19	9	3

Table 28-2**.** Mountain goat survey flight information for the Juneau survey area, which includes RG014 and several non-hunt goat viewing areas.

Year	No. adults	No. kids	Total goats	Kids:100 adults	Percent kids	Goats/hour
2009	235	67	302	29	22	110
2014	291	71	362	24	20	81
2018*	81	6	97	7	6	24
2021	214	32	246	15	13	103

*Conducted during an especially hot day that impacted survey results.

While the area of RG014 will change only slightly if this proposal is adopted (Figure 28-1), it could result in increased harvest for this hunt unit. This change would open up hunting along the Juneau road-system, something that has been closed since 2012 when the draw hunt south of Herbert Glacier was closed because the goat population in that area could not support hunting at that time. There are no goat hunting areas in Unit 1C with the access that this area would have if this change was made. Furthermore, the boundary change would open up a small but heavily used wintering area with traditional migration pathways (a trail used by many of the area's goat population to cross Sheep Creek). The ease of access and the availability of hunting on winter habitat make this population vulnerable to local population depletion in an area that is also used by locals and visitors for goat viewing and photography.

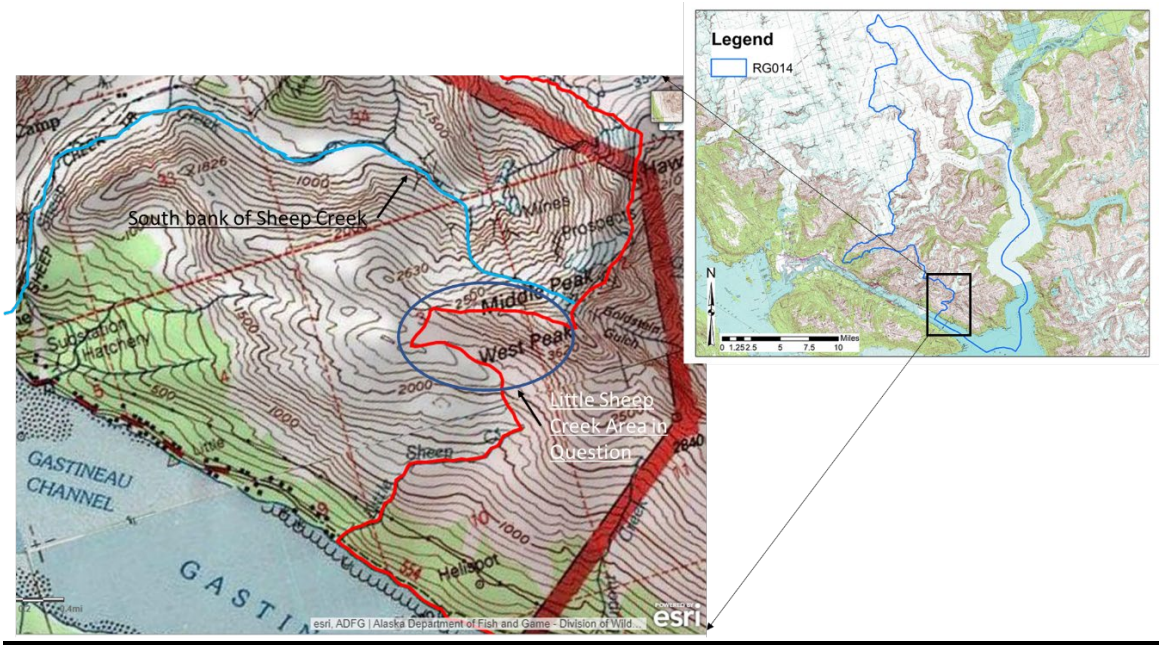

Figure 28-1. Map depicting the RG014 hunt area with an inset of the Sheep Creek and Little Sheep Creek drainages where hunters have problems determining the boundary (dark blue circle) and where the boundary would move (light blue line).

DEPARTMENT COMMENTS: The department **is NEUTRAL on** this proposal based on the allocative nature of differing uses by user groups. If adopted, the department recommends the board amend it due to concerns of local population depletion, and conflict among consumptive and non-consumptive users. The area outlined provides easy access in areas used by many who come for goat viewing only. To alleviate potential conflict between viewers and hunters, the department suggests a boundary that follows the 2,000 foot contour at the head of Little Sheep Creek. This would result in a slightly larger area added to RG014 while clearing up the ambiguity of the boundary (Figure 28-2). This amendment would not create new conflict among consumptive and non-consumptive users while still limiting access on the Juneau road-system.

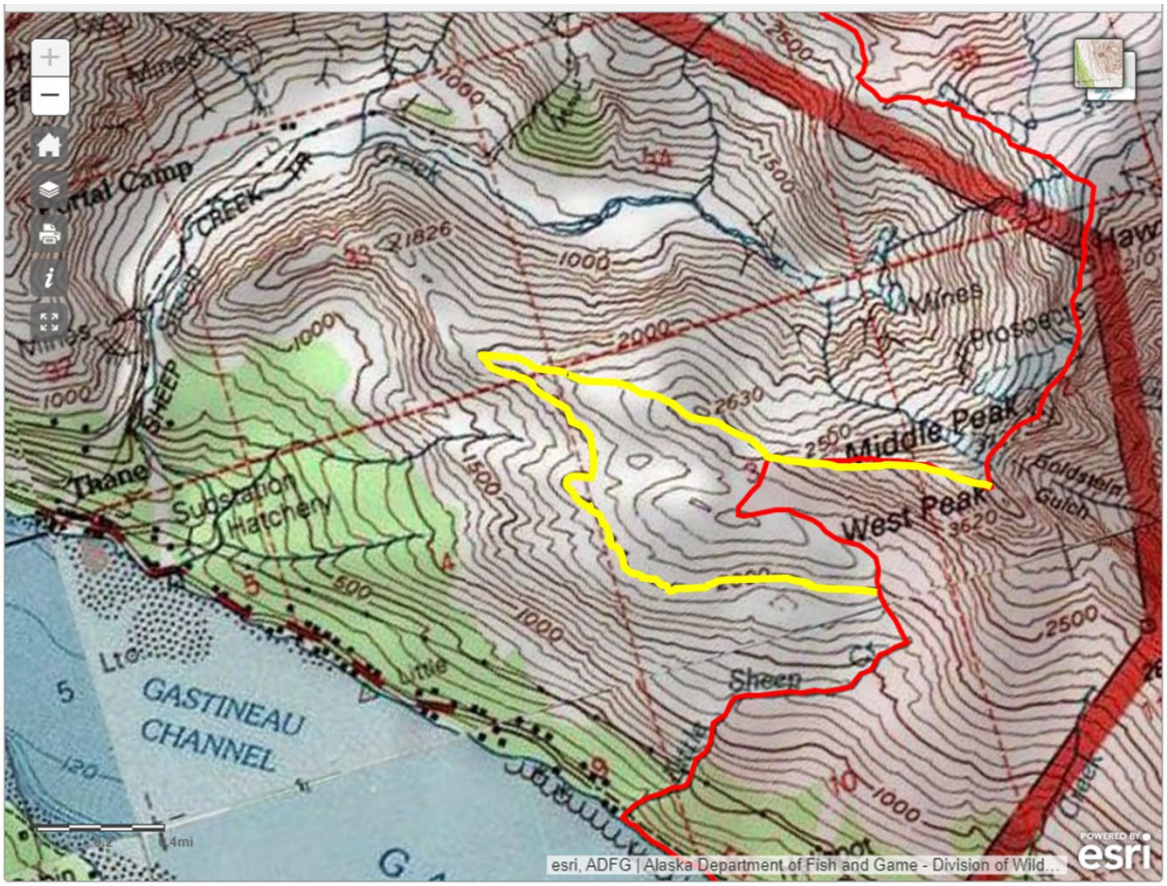

Figure 28-2. A depiction of a possible alternative boundary (in yellow) to make the RG014 boundary in upper Little Sheep Creek clearer.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 29 – 5 AAC 85.040(a)(1) Hunting seasons and bag limits for goat.

PROPOSED BY: Tyler Riberio

WHAT WOULD THE PROPOSAL DO? This proposal would move the boundary of RG014 from the ridgeline of Blackerby Ridge to the west to include the western/northern portion of Blackerby Ridge as well as Thunder Mountain/Heintzleman Ridge above 2,000 ft.

WHAT ARE THE CURRENT REGULATIONS? The hunt area is Unit 1(C), the mainland portion draining into the south bank of Little Sheep Creek, Gastineau Channel south of Little Sheep Creek, Stephens Passage, and Taku Inlet between the mouth of Little Sheep Creek and Taku Glacier, including the portion between the south side of Blackerby Ridge and the north side of Salmon Creek Reservoir, above the 1,000 foot contour, east along that contour to the north shore

of Salmon Creek Reservoir, north of the main drainage into the head of reservoir following that drainage south and east up to the ridgeline and east to Olds Mountain (Figure 29-1).

The bag limit is 1 goat by registration permit only, and by bow and arrow only; the taking of nannies and kids is prohibited.

The hunt area is within the Juneau Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would increase the area open to archery hunting in RG014 and substantially increase hunter access to goats near Juneau. It would open an area to goat hunting with relatively easy access from the Juneau road-system, although it would still be considered a difficult hunt. To date, this level of access has only existed at Blackerby Ridge. The new area included in the boundary expansion is used extensively for nonconsumptive activities and some overlap of consumptive and nonconsumptive uses and possible user conflict would be expected if this proposal were adopted.

BACKGROUND: Small geographic areas within hunt areas are used to manage mountain goat harvest in Southeast Alaska. The smaller management areas allow the department to prevent the depletion of local goat populations due to greater accessibility to goats. Guideline harvest levels (GHL) are established for each area and are based on the allocation of points determined through aerial surveys (male goat = 1 point, female goat = 2 points) within each area. GHLs are established by allowing the harvest of 6 points per 100 adult goats seen during aerial surveys. Once the harvest has reached the GHL the hunt is closed by emergency order. The harvest of billies is encouraged to increase opportunity to other hunters and ensure the long-term sustainability of the localized populations. Harvest levels within RG014 have been set at 7 points for at least the last 5 years.

During the 1980s and early 1990s mountain goats were very scarce along the road system south of the Mendenhall Glacier. Prior to this area being closed, the last goat harvested in this area was hunted legally but under much controversy in 1981. By 1984 the area between Mendenhall Glacier and Taku Glacier was closed to goat hunting, and the board decided that much of this area should be reserved for goat viewing, including the Mount Bullard and Mount Juneau Closed Areas [5 AAC 92.510(a)(1)(D) and (F)]. The RG014 hunt area was opened to archery hunting in 1999. At the 2015 board meeting, there was a proposal to increase the archery area of RG014. After extensive discussion, the board decided that the south side of Blackerby Ridge should be added to the RG014 hunt area, thus creating the current hunt area boundary.

Mountain goat aerial surveys have occurred irregularly because of inclement survey weather and other survey priorities (Table 29-1). The survey area (the mainland between the Mendenhall Glacier and Taku Glacier) includes the RG014 archery area (Figure 29-1) as well as several non-hunt goat viewing areas. The area that the proponent would add to the hunt area would allow for the harvest of 1-2 more goats per year based on the 9-15 goats observed in this area during the last two surveys. Many goats in this area are nannies and kids, and an increase in nanny harvest is anticipated.

Hunter participation and harvest of mountain goats is dependent on fall weather and hunter participation declines by one-half or more with inclement weather. Normally about 30 permits are issued for RG014, but anywhere from 5 to 21 hunters have hunted since the hunt began in 2014 (Table 29-2). There have been as many as 8 goats harvested in this hunt, but the average is 4 goats.

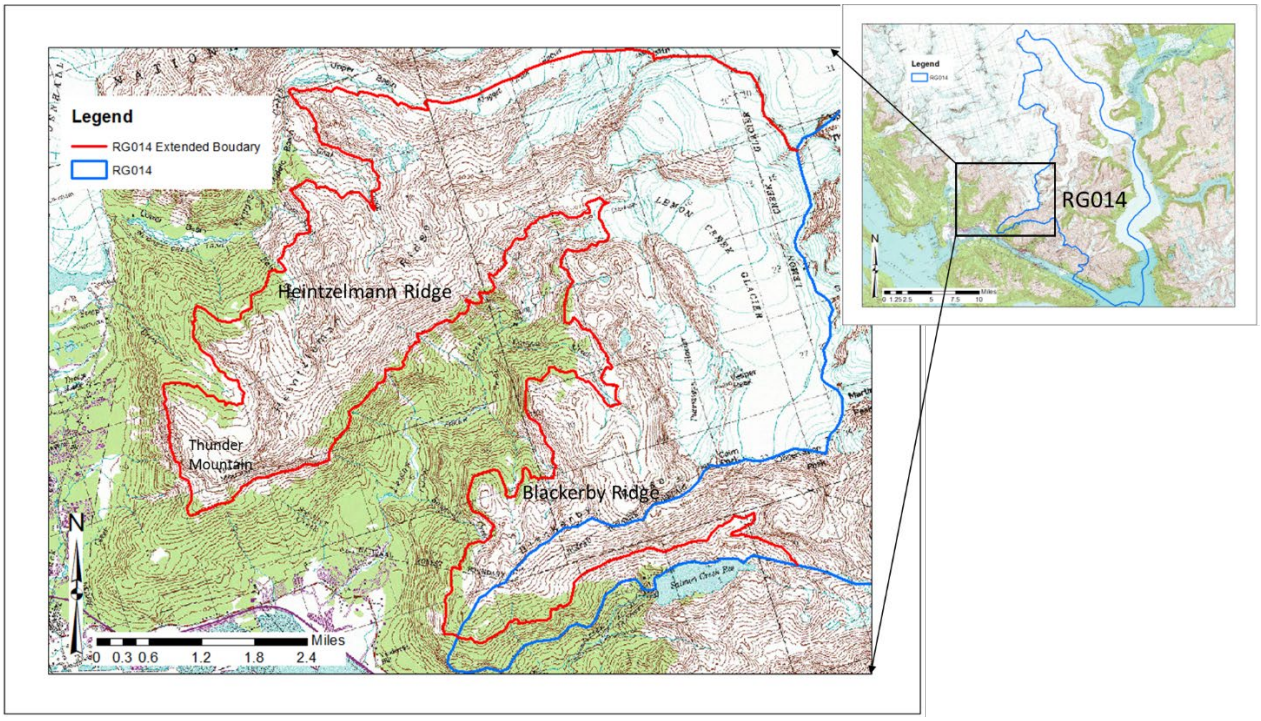

Figure 29-1. Map depicting the current boundary of RG014 in blue as well as the proposed RG014 boundary in red. The two boundaries do not match up on the east side of Blackerby Ridge because the previous boundary is defined by the 1,000 ft contour, while the proposal suggests defining the boundary by the 2,000 ft contour.

Table 29-1. Mountain goat survey flight information for the Juneau survey area, which includes RG014 and several non-hunt goat viewing areas.

Year	No. adults	No. kids	Total goats	Kids:100 adults	Percent kids	Goats/hour
2009	235	67	302	29	22	110
2014	291	71	362	24	20	81
2018*	81	6	97	7	6	24
2021	214	32	246	15	13	103

*Conducted during an especially hot day that impacted survey results.

Table 29-2. Number of permits issued, hunters, and goat harvest for RG014 in RY14–21.

Regulatory Year	RG014 Permits*	Hunted	Harvested
2014	11	11	3
2015	13	5	2
2016	33	24	8
2017	31	18	4
2018	24	21	6
2019	21	12	4
2020	38	23	4
2021	19	9	3

*The number of hunters that indicated they were hunting the archery area based on their permit. Hunters can still hunt RG014 under other Southeast goat registration permits RG012,013, and 015.

At its core this proposal brings up the question of what areas should be used for which user group when it comes to goat hunting versus goat viewing. Thunder Mountain, parts of Heintzleman Ridge, and parts of Blackerby Ridge are traditional goat viewing areas along with the protected Mt. Bullard and Mt. Juneau Closed Areas, but the department does not collect information on nonconsumptive goat use in the Juneau area so the level of use cannot be quantified. The current mountain goat hunt does not use all of the guideline harvest points, but it is also a difficult hunt and opening all or part of this area would make it easier to harvest goats.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because the department can manage the hunt by GHL, and there is an allocative aspect between consumptive and nonconsumptive users. However, department biologists would caution that including some areas such as Thunder Mountain and much of Heintzleman Ridge could create user conflict because these areas are currently used by large numbers of nonconsumptive recreationists and wildlife viewers.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 30 – 5 AAC 85.040(a)(1) Open a fall archery goat hunt in Unit 1C, the southern end of the Chilkat Range.

PROPOSED BY: Jonathan Geary

WHAT WOULD THE PROPOSAL DO? This proposal would create an archery only hunt from 1 August through August 31 for the goat season in RG015. This would also increase the length of the RG015 hunt 1 month at the beginning of the season and could be initiated as a new hunt.

WHAT ARE THE CURRENT REGULATIONS?

In Unit 1(C), that portion including all drainages of the Chilkat Range south of the south bank of the Endicott River:
Resident Open Season Sept. 1 – Nov. 30; Nonresident Open Season Sept. 1 – Nov. 30;

1 goat by registration permit only; the taking of nannies and kids is prohibited.

There is a positive C&T finding for goats in Unit 1C, outside of the Juneau Nonsubsistence Area, with an ANS of 25-30 goats.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would increase the hunting season by 1 month at the beginning of the goat season starting the hunt 1 August instead of 1 September. It would also provide another archery only hunt in Southeast Alaska for the month-long period. With an additional 31 days of hunting an increase in goat harvest is expected.

BACKGROUND: The department uses small geographic areas within hunt areas to manage mountain goat harvest in Southeast Alaska. Guideline harvest levels (GHL) are established for each area and are based on the allocation of points determined through aerial surveys (male goat = 1 point, female goat = 2 points) within each area. GHLs are established by allowing the harvest of 6 points per 100 adult goats seen during aerial surveys. Once the harvest has reached the GHL the hunt is closed by emergency order. The harvest of billies is encouraged to increase opportunity for other hunters and ensure the long-term sustainability of localized populations. The guideline harvest levels within the current registration hunt area RG015 (Figure 30-1) allow for the harvest of up to 18 goat points.

Aerial surveys for goats on the Chilkat Peninsula have been intermittent (Table 30-1) because this area has not been a priority due to low harvest and large areas of hunter-inaccessible goat habitat that buffers the goat population from harvest impacts. The total number of adult goats observed has steadily increased across the surveys; however, the standardized measure of goats/hr does not show a trend, probably due to variation in survey conditions.

Table 30-1. Aerial survey results for the Chilkat Peninsula starting in 2000. The last survey was conducted in 2011.

Year	No. Adults	No. kids	Total goats	Kids:100 adults	Percent kids	Goats/ hour
2000	143	30	173	21	17	36
2002	152	26	178	17	15	85
2006	203	33	236	16	14	16
2011	223	44	267	20	16	51

Hunter participation and harvest of mountain goats is dependent on fall weather, and with inclement weather hunter participation can decline by one-half or more. Anywhere from 6 to 24 hunters have hunted this area over the past 10 years and the harvest has totaled from 2 to 9 animals (Table 30-2). On average over the last 10 years, about 20% of the harvest has been of females. Over the last decade, goat harvest has been low compared to the guideline harvest level in this area.

Figure 30-1. The current extent of the RG015 mountain goat hunt area on the Chilkat Peninsula, Alaska.

Table 30-2. The number of mountain goat hunters who hunted, nonresident hunters, and harvest of residents and nonresidents in RG015, Alaska RY12-21.

Regulatory Year	Hunted	Nonresident Hunters	Harvest (NR)
2012	10	0	3
2013	22	1	6 (1)
2014	8	0	4
2015	8	0	2
2016	24	0	9
2017	10	1	4

2018	18	2	4 (1)
2019	10	0	3
2020	10	1	4 (1)
2021	6	0	2

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because the department does not anticipate a conservation concern if adopted, and the proposal is allocative in requesting a bow only hunt. If adopted the board may want to consider if restricting hunts to bow only is necessary considering the low hunter effort and the number of goats available for harvest. If adopted, the board should consider whether the regulations continue to provide a normally diligent participant the opportunity for success in harvesting a goat for subsistence uses.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 31 – 5 AAC 85.040(a)(1) Hunting seasons and bag limits for goats.

PROPOSED BY: Resident Hunters of Alaska

WHAT WOULD THE PROPOSAL DO? This proposal would create a resident only, eliminating the nonresident hunt, hunt in the RG015 hunt area and begin the season one month earlier on 1 August. The proponent also suggests that the department goat gender identification quiz be required.

WHAT ARE THE CURRENT REGULATIONS?

In Unit 1(C), that portion including all drainages of the Chilkat Range south of the south bank of the Endicott River:
Resident Open Season Sept. 1 – Nov. 30; Nonresident Open Season Sept. 1 – Nov. 30

1 goat by registration permit only; the taking of nannies and kids is prohibited. There is a positive C&T finding for goats in Unit 1C, outside the Juneau Nonsubsistence Area, and an ANS of 25-30 goats.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would increase the hunting season by 1 month at the beginning of the goat season, starting the hunt 1 August instead of 1 September. It would also eliminate the current nonresident season from this area that currently runs 1 September to 30 November. With the additional 31 days of hunting an increase in goat harvest is likely.

BACKGROUND: The department uses small geographic areas within hunt areas to manage mountain goat harvest in Southeast Alaska. GHLs are established for each area and are based on

the allocation of points determined through aerial surveys (male goat = 1 point, female goat = 2 points) within each area. GHLs are established by allowing the harvest of 6 points per 100 adult goats seen during aerial surveys. Once the harvest has reached the GHL the hunt is closed by emergency order. The harvest of billies is encouraged to increase opportunity for other hunters and ensure the long-term sustainability of localized populations. The guideline harvest levels within the current registration hunt area RG015 (Figure 31-1) allow for the harvest of up to 18 goat Points.

Aerial surveys for goats on the Chilkat Peninsula have been intermittent (Table 31-1) because this area has not been a priority due to low harvest and large areas of hunter-inaccessible goat habitat that buffers the goat population from harvest impacts. The total number of adult goats observed has steadily increased across the surveys; however, the standardized measure of goats/hr does not show a trend, probably due to variation in survey conditions, which are known to influence goat survey results.

Table 31-1. Aerial survey results for the Chilkat Peninsula starting in 2000. The last survey was conducted in 2011.

Year	No. Adults	No. kids	Total goats	Kids:100 adults	Percent kids	Goats/ hour
2000	143	30	173	21	17	36
2002	152	26	178	17	15	85
2006	203	33	236	16	14	16
2011	223	44	267	20	16	51

Hunter participation and harvest of mountain goats is dependent on fall weather, and with inclement weather hunter participation can decline by one-half or more. Anywhere from 6 to 24 hunters have hunted this area over the past 10 years and harvest has totaled from 2 to 9 animals (Table 31-2). On average over the last 10 years, about 20% of the harvest has been of females. Over the last decade goat harvest has been low compared to the GHL in this area.

Figure 31-1. The current extent of the RG015 mountain goat hunt area on the Chilkat Peninsula, Alaska.

Table 31-2. The number of mountain goat hunters who hunted, nonresident hunters, and harvest by residents and nonresidents in RG015, Alaska RY12-21.

Regulatory Year	Hunted	Nonresident Hunters	Harvest (NR)
2012	10	0	3
2013	22	1	6 (1)
2014	8	0	4
2015	8	0	2
2016	24	0	9
2017	10	1	4
2018	18	2	4 (1)
2019	10	0	3
2020	10	1	4 (1)
2021	6	0	2

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is allocative and there are no biological issues. If adopted, the board may want to consider

lengthening the season for nonresidents as well given the low number of hunters and the number of goat points typically available in this hunt area.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 32 – 5 AAC 85.40(a)(1) Hunting seasons and bag limits for goat.

PROPOSED BY: Upper Lynn Canal Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? If a female mountain goat is harvested in Unit 1D, the hunter will not be allowed to hunt mountain goats in Unit 1D during the following regulatory year.

WHAT ARE THE CURRENT REGULATIONS?

Season		Bag Limit
RG023	Sept 15-Nov 15	1 goat by permit. The taking of nannies with kids is prohibited.
RG024	Sept 15-Nov 30	
RG025	Sept 15-Nov 15	
RG026	Sept 15-Dec 31	

There is a positive C&T finding for goats in Unit 1D, with an ANS of 10-15 goats.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, the proposal would further encourage hunters to target only male mountain goats. Retaining more adult females in the population could help populations to recover more quickly when populations are low and provide greater hunting opportunity in the long-term. Reasonable opportunity for success in taking a goat for subsistence uses in Unit 1D may be impacted if a hunter is prohibited from hunting the following year.

BACKGROUND: This proposal was submitted because some hunters are concerned about low mountain goat numbers in portions of Unit 1D. The board adopted similar proposals for Units 6, 7, and 15, which state that if a nanny is taken in any of those units the hunter is prohibited from hunting any goats in the unit for 5 years.

Goat hunt management of Unit 1D is divided into 22 subunits (i.e., smaller hunt areas) to maximize hunting opportunity. Each subunit has an individual guideline harvest level (GHL) based on the number of goats observed during aerial surveys. For every 100 goats observed during an aerial survey, 6 harvest points (6% of the count) are assigned to a subunit. When a goat is harvested, 1 point is deducted if it's a male, 2 points if female. When the harvest reaches the HGL, the hunt is closed by emergency order for that subunit. For example, a subunit with a HGL of 1-2 can support

a harvest of two males (or one female) before it is closed by emergency order. In Unit 1D, 7 subunits support an HGL of only 1-2 points and 3 subunits have been closed without any open season for several consecutive years (Figure 32-1).

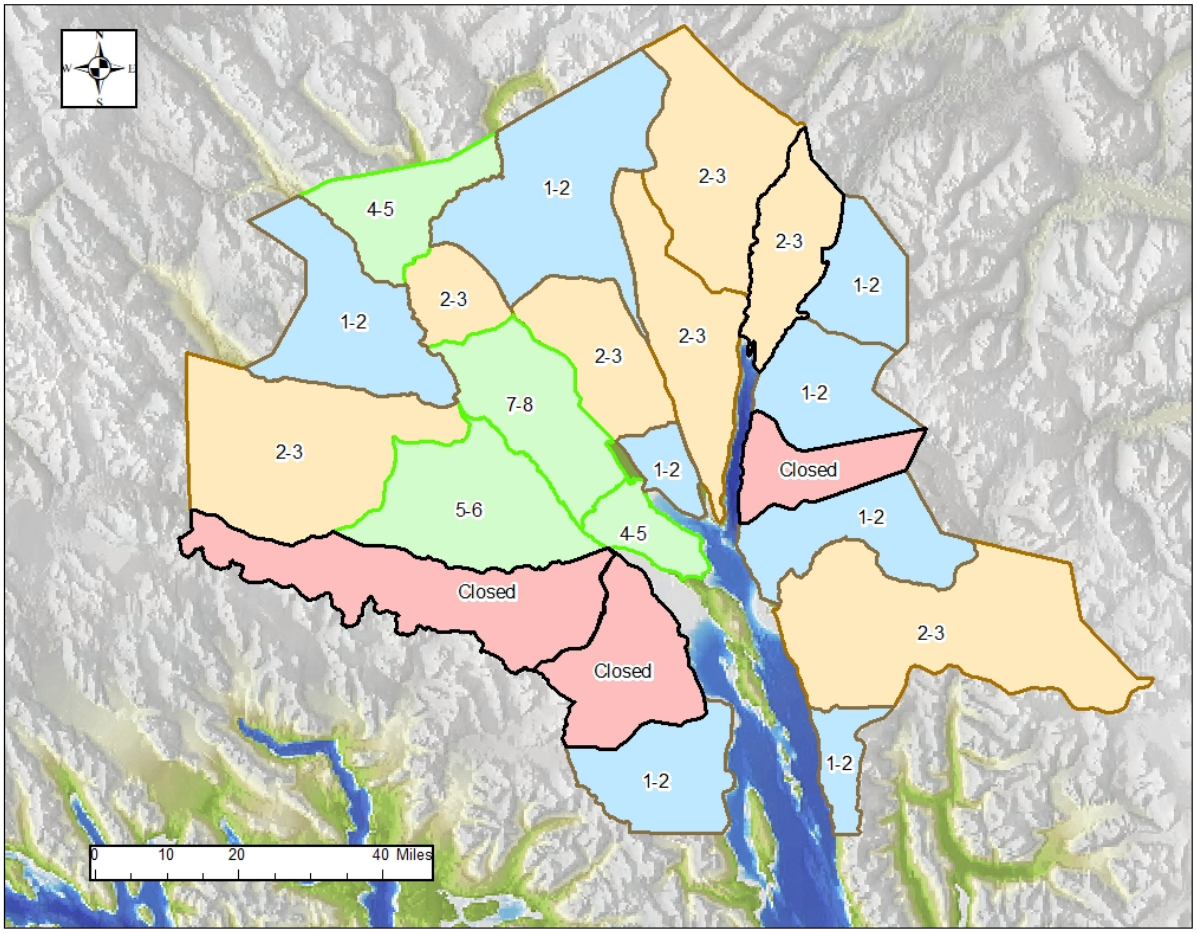

Figure 32-1. RY 2022 mountain goat harvest guideline levels shown by subunit before the fall 2022 season began.

Aerial survey results in Unit 1D vary depending on survey conditions (i.e., sightability) and population size, which depends on survival and birth rates. Since 2017, the Four Winds Range and Takinsha Range have seen declining counts, while the Hiteshitak Range counts have typically increased (Figure 32-2). The Skagway Pie appears to have rebounded in 2019 (Figure 32-2). Note that surveys were not accomplished in the Hiteshitak Range in 2021 or the Skagway Pie in 2020 and 2021 due to poor weather conditions, which is a frequent challenge to the goat monitoring program in Unit 1D.

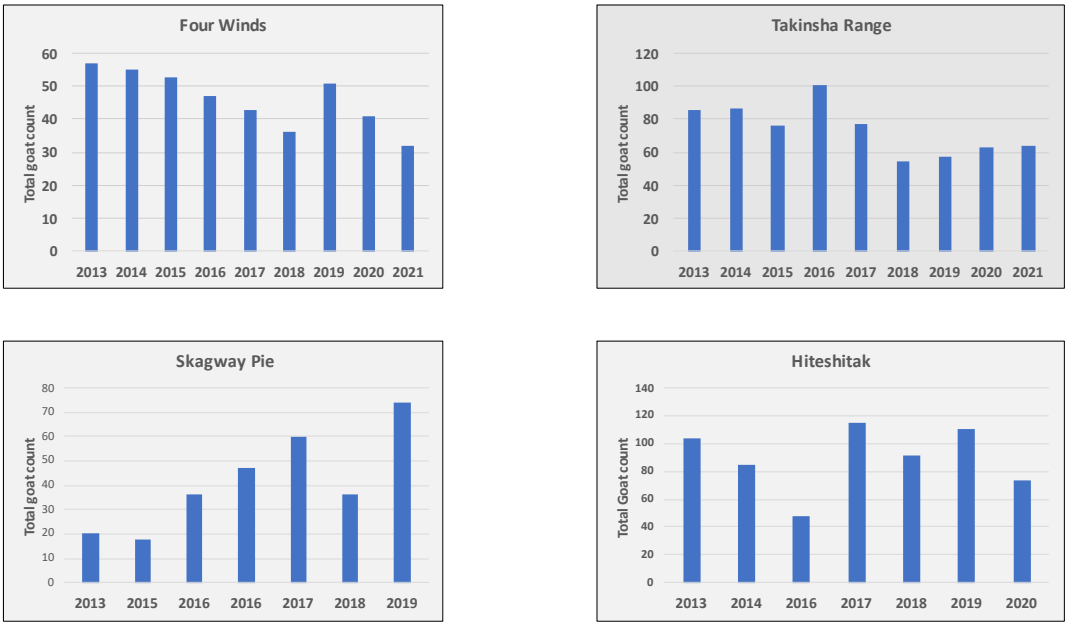

Figure 32-2. Goat population trends in four hunt subunits within GMU 1D.

In 2016, the department instituted a mandatory mountain goat sex identification quiz for goat hunting in Unit 1D which provides education designed to encourage hunters to target males. Despite this effort, female harvest increased to 46% that year (Figure 32-3). During the 6-year period before the quiz requirement went into effect (2010–2015) hunter harvest averaged 32% female (range 22%–37%). Since the quiz requirement went into effect in (2016–2021), the female portion of the harvest averaged 26% (range 13%–46%).

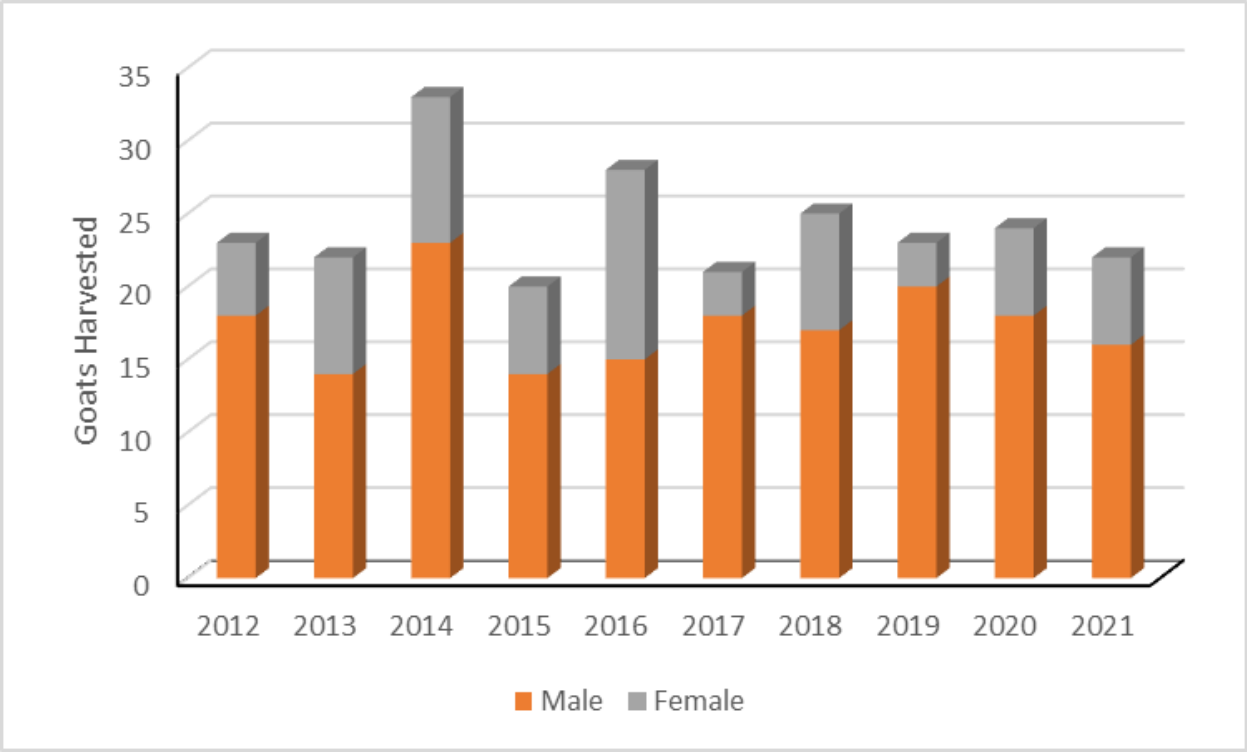

Figure 32-3. Mountain goat harvest in Unit 1D from regulatory years 2012–2021.

Mountain goat populations are slow to recover from declines because adult females typically do not have their first kid until 4 to 6 years old and females do not always reproduce every year. In addition, young mountain goats experience high mortality. Efforts to educate the public and convince hunters to target only male mountain goats have had mixed results. Loss of too many females can cause population declines that reduce hunting opportunity. Targeting males has the potential to increase hunting opportunity by leading to population growth, especially in years with mild winters (Figure 32-4).

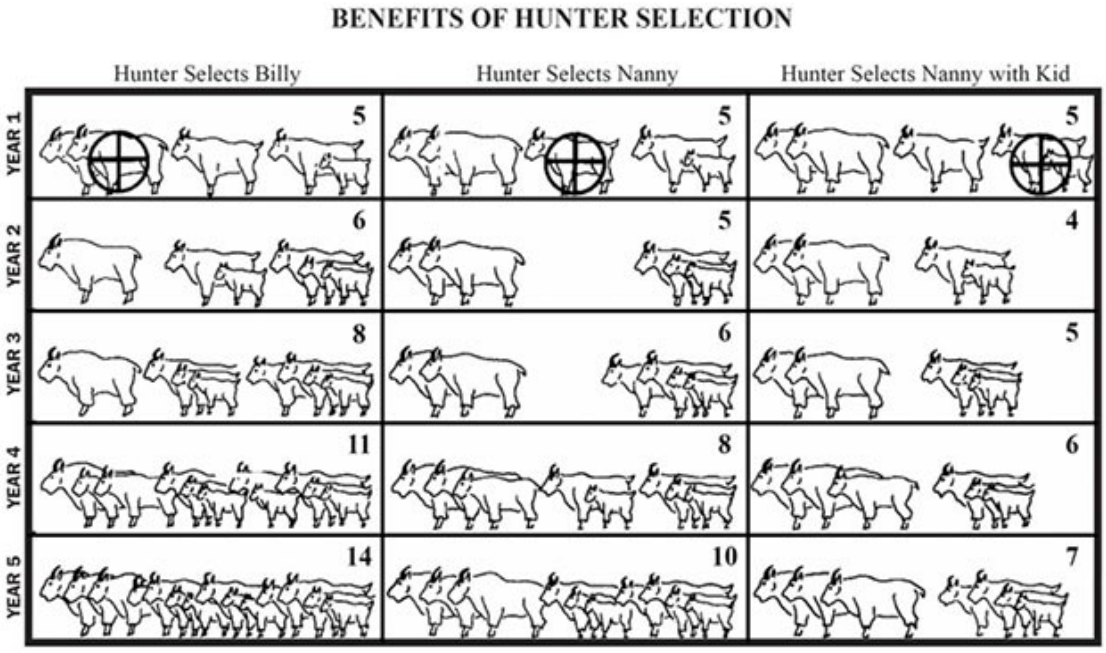

Figure 32-4. Effects of selecting males versus female harvest on mountain goat populations.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal but does generally support actions to decrease female goat harvest. Unlike many units, Unit 1D goats are often harvested for a source of meat. If adopted, the board should consider whether the regulations continue to provide a normally diligent participant a reasonable opportunity for success in harvesting a goat for subsistence uses.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 33 – 5 AAC 85.020(a)(1) Hunting seasons and bag limits for brown bear.

PROPOSED BY: Jonathan Geary

WHAT WOULD THE PROPOSAL DO? Allow for the harvest of 1 brown bear every regulatory year by registration permit in Unit 1C, that portion of the Chilkat Peninsula north of Point Couverden and south of Sullivan Island, for residents only.

WHAT ARE THE CURRENT REGULATIONS? Remainder of Unit 1; 1 bear every 4 regulatory years by registration permit only, open to residents and nonresidents, with season dates of September 15 – December 31 and March 15 – May 31.

There is a positive C&T finding for brown bears in Unit 1C outside of the Juneau Nonsubsistence

Area, with an ANS of one brown bear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow resident hunters to take a brown bear every year instead of every 4 years on the Unit 1C portion of the Chilkat Peninsula. This change may increase harvest in an area with a low density brown bear population.

BACKGROUND: Anecdotal reports suggest that the brown bear population on the Chilkat Peninsula (Figure 33-1) has increased. The department currently uses harvest statistics to monitor population levels (Table 33-1). Over the past ten years (RY12-21) both harvest and hunter participation have increased for brown bears on the Chilkat Peninsula. During the most recent 5-year period (RY17-21) hunter participation per year was 16.2 hunters and harvest was 5.0 bears and in the previous 5-year period (RY12-16) hunter participation per year was 14.4 hunters and harvest per year was 2.2 bears (Table 33-1). With the increase in hunter participation along with the increase in harvest, it is difficult to determine if reports of an increased brown bear population are accurate. However, an increase in harvest of brown bears has already occurred and could potentially continue in the future.

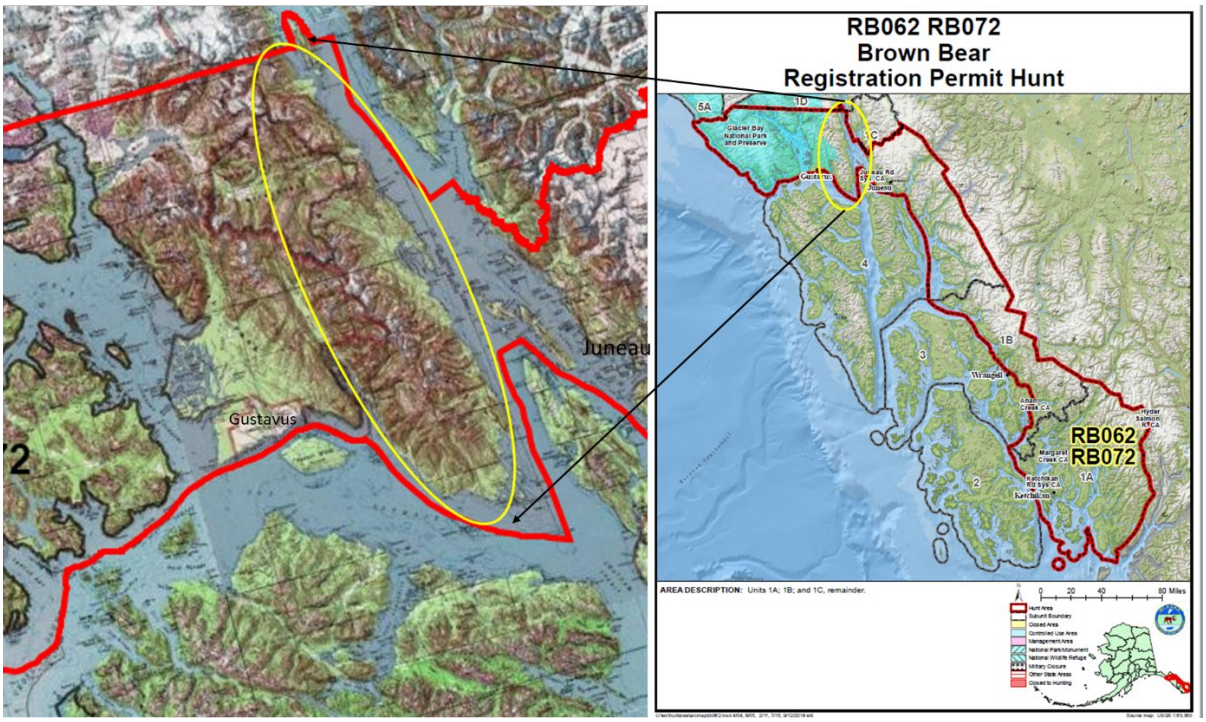

Figure 33-1. A map of the Chilkat Peninsula as well as an overall map of RB062 and RB072 showing where the Chilkat Peninsula is in Unit 1C.

Table 33-1. Brown bear hunter participation and harvest on the Chilkat Peninsula, Alaska, RY12-21.

Regulatory Year	Total Hunters	Non-resident Hunters	Spring Harvest	Fall Harvest	Total Harvest
2012	12	0	2	0	2
2013	12	0	0	0	0
2014	20	3	5	0	5
2015	9	0	1	0	1
2016	19	0	2	1	3
2017	10	2	1	1	2
2018	16	2	4	2	6
2019	14	0	4	1	5
2020	25	1	6	2	8
2021	16	2	4	0	4

The department estimates the brown bear population on the Chilkat Peninsula to be between 68 and 133 bears. At 4% of the estimated population size, an estimated harvestable surplus is 3-5 brown bears (Table 33-2), which is a conservative harvest estimate established in the Unit 4 Brown Bear Management Plan and used throughout Southeast Alaska. Harvest in the Chilkat Peninsula area has been approaching twice the 4% conservative harvest estimate for the last 4 years. The department has developed more recent population estimates that are higher than previously determined. A higher population estimate allows for additional harvest before reaching the conservative 4% threshold.

Table 33-2. Brown bear management guidelines for board consideration for harvestable surplus on the Chilkat Peninsula in Unit 1C. Density estimates from several areas around Southeast Alaska are used to determine harvest estimates based on available Chilkat Peninsula brown bear habitat.

	Estimated Population size	**Bear habitat area (km^2)**	**Bear habitat area (mi^2)**	**Density/ 1,000km^2**	**Density/ mi^2**	**Estimated Sustainable Mortality Level (4.0% annual level)**	**Allowable Reported Harvest**	**Mortality rate**
Chilkat Peninsula - GMU 1C - Yakutat density	*133*	1,350	521.24	98.83	0.256	5	4.4	3.7%
Chilkat Peninsula - GMU 1C - Berner's Bay density	*122*	1,350	521.24	90.21	0.234	5	4.0	4.1%
Chilkat Peninsula - GMU 1C - Coastal Alaska density	*68*	1,350	521.24	50.00	0.129	3	2.2	4.0%

The department regularly receives comments about how an increase in brown bear numbers have impacted the number of black bears in the Chilkat area. It is possible that brown bears have displaced black bears up into higher country. The number of days it takes to harvest a brown bear over the last 10 years has been 2.2 days/bear harvested (range 1-5). Over the last 10 years, the number of days to harvest a black bear have been 3.2 days/bear harvested (range 2-6) with no increasing or decreasing trend, indicating that required hunter effort to successfully harvest a black bear has not changed in the last decade. The brown bear population has probably had little impact on the deer population because brown bears are not a heavy deer predator and, except for the lowest part of the Chilkat Peninsula, there were never many deer on the peninsula.

The proponent of this proposal suggests that the Chilkat Peninsula should be managed the same as Berners Bay; however, there are several differences and possible reasons for different management. First, the Berners Bay moose population is an isolated population introduced to Berners Bay in 1958 and 1960. This moose population has been closely managed since that time because the population is small and not supplemented by other moose populations. Furthermore, the Berners Bay moose hunt is the only draw moose hunt in Southeast Alaska. Because of the vulnerability of this moose population and concerns with mortality from bears, the board allowed an every-year brown bear harvest in this area, but that has not yet been the case anywhere else in Southeast where moose and other prey populations have naturally colonized. Furthermore, the brown bear harvest change has not resulted in an increased harvest. In the 9 years since the change, 0.88 bears/year were harvested, while in the 9 years prior to the change 1.44 bears/year were harvested.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal; however, hunter participation and harvest are increasing in this area, and current harvest levels are above current management recommendations.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 34 – 5 AAC 85.020(a)(1) Hunting seasons and bag limits for brown bear.

PROPOSED BY: Resident Hunters of Alaska

WHAT WOULD THE PROPOSAL DO? Allow for the harvest of 1 brown bear every regulatory year by registration permit in Unit 1C, that portion of the Chilkat Peninsula north of Point Couverden and south of Sullivan Island, for residents only.

WHAT ARE THE CURRENT REGULATIONS? Remainder of Unit 1; 1 bear every 4 regulatory years by registration permit only, open to residents and nonresidents, with season dates of September 15 – December 31 and March 15 – May 31.

There is a positive C&T finding for brown bears in Unit 1C outside of the Juneau Nonsubsistence Area, with an ANS of one brown bear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow resident hunters to take a brown bear every year instead of every 4 years on the Chilkat Peninsula portion of Unit 1C. This change may increase harvest in an area with a low density brown bear population.

BACKGROUND: Anecdotal reports suggest that the brown bear population on the Chilkat Peninsula (Figure 34-1) has increased. The department currently uses harvest statistics to monitor population levels (Table 34-1). Over the past ten years (RY12-21) both harvest and hunter participation have increased for brown bears on the Chilkat Peninsula. During the most recent 5-year period (RY17-21) hunter participation per year was 16.2 hunters and harvest was 5.0 bears and in the previous 5-year period (RY12-16) hunter participation per year was 14.4 hunters and harvest per year was 2.2 bears (Table 34-1). With the increase in hunter participation along with the increase in harvest, it is difficult to determine if reports of an increased brown bear population are accurate. However, an increase in harvest of brown bears has already occurred and could potentially continue in the future.

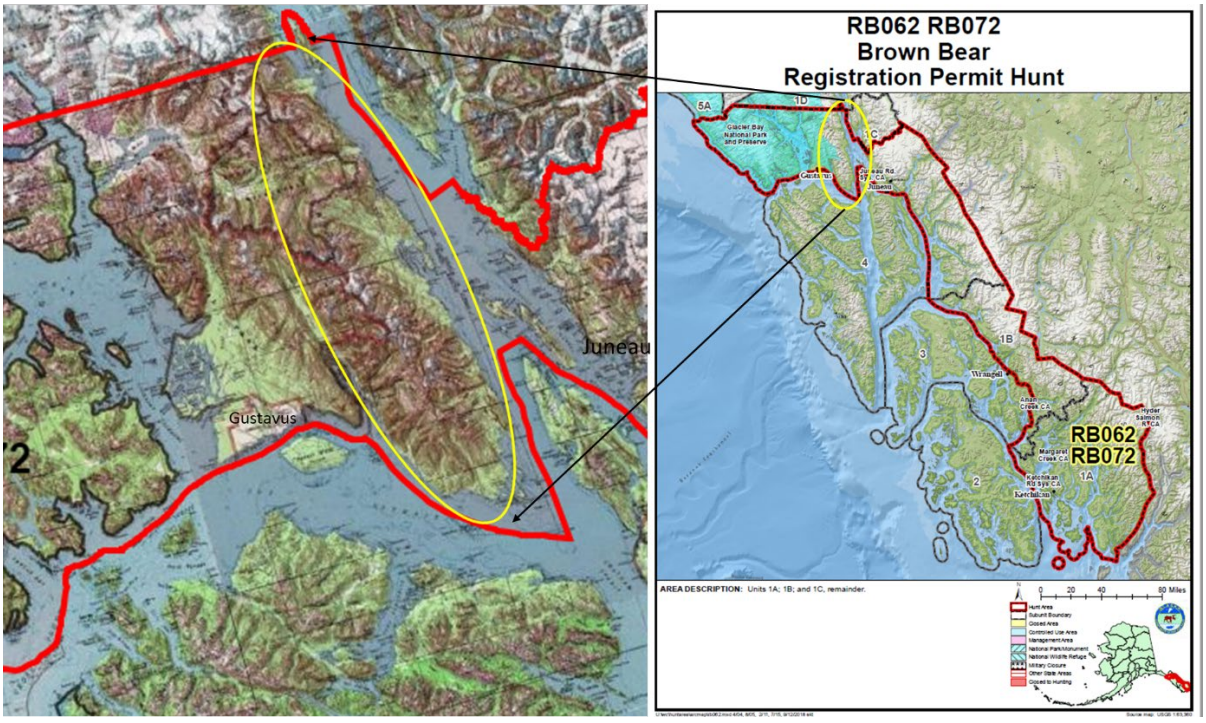

Figure 34-1. A map of the Chilkat Peninsula as well as an overall map of RB062 and RB072 showing where the Chilkat Peninsula is in Unit 1C.

Table 34-1. Brown bear hunter participation and harvest on the Chilkat Peninsula, Alaska, RY12-21.

Regulatory Year	Total Hunters	Non-resident Hunters	Spring Harvest	Fall Harvest	Total Harvest
2012	12	0	2	0	2
2013	12	0	0	0	0
2014	20	3	5	0	5
2015	9	0	1	0	1
2016	19	0	2	1	3
2017	10	2	1	1	2
2018	16	2	4	2	6
2019	14	0	4	1	5
2020	25	1	6	2	8
2021	16	2	4	0	4

The department estimates the Chilkat Peninsula brown bear population to be between 68 and 133 bears. At 4% of the estimated population size, an estimated harvestable surplus is 3-5 brown bears (Table 34-2 which is a conservative harvest estimate established in the Unit 4 Brown Bear Management Strategy and used throughout Southeast Alaska. Harvest in the Chilkat Peninsula area has been approaching twice the 4% conservative harvest estimate for the last 4 years. The department has developed more recent population estimates that are higher than previously determined. A higher population estimate allows for additional harvest before reaching the conservative 4% threshold.

Table 34-2. Brown bear management guidelines for the board to consider for harvestable surplus on the Chilkat Peninsula in Unit 1C. Density estimates from several areas around Southeast Alaska are used to determine harvest estimates based on available Chilkat Peninsula brown bear habitat.

	Estimated Population size	**Bear habitat area (km^2)**	**Bear habitat area (mi^2)**	**Density/ 1,000km^2**	**Density/ mi^2**	**Estimated Sustainable Mortality Level (4.0% annual level)**	**Allowable Reported Harvest**	**Mortality rate**
Chilkat Peninsula - GMU 1C - Yakutat density	*133*	1350	521.24	98.83	0.256	5	4.4	3.7%
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Chilkat Peninsula - GMU 1C - Coastal Alaska density	*68*	1350	521.24	50.00	0.129	3	2.2	4.0%

The department regularly receives comments about how an increase in brown bear numbers have impacted the number of black bears in the area. It is possible that brown bears have displaced black

bears up into higher country. The number of days it takes to harvest a brown bear over the last 10 years has been 2.2 days/bear harvested (range 1-5). Over the last 10 years, the number of days to harvest a black bear have been 3.2 days/bear harvested (range 2-6), with no increasing or decreasing trend, indicating that required hunter effort to successfully harvest a black bear has not changed in the last decade. The brown bear population has probably had little impact on the deer population because brown bears are not a heavy deer predator and, except for the lowest part of the Chilkat Peninsula, there were never many deer on the peninsula.

The proponent of this proposal suggests that the Chilkat Peninsula should be managed the same as Berners Bay; however there are several differences and possible reasons for different management. First, the Berners Bay moose population is an isolated population introduced to Berners Bay in 1958 and 1960. This moose population has been closely managed since that time because the population is small and not supplemented by other moose populations. Furthermore, the Berners Bay moose hunt is the only draw moose hunt in Southeast Alaska. Because of the vulnerability of this population, the board allowed an every-year brown bear harvest in this area, but these changes have not been adopted anywhere else in Southeast where moose and other prey populations have naturally colonized. Furthermore, the brown bear harvest change has not resulted in an increased harvest. In the 9 years since the change, 0.88 bears/year were harvested, while in the 9 years prior to the change 1.44 bears/year were harvested.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal; however, hunter participation and harvest are increasing in this area, and current harvest levels are above the recommended harvest.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 35 – 5 AAC 85.015(a)(1) Extend the bear baiting season for Unit 1D.

PROPOSED BY: Adam Smith

WHAT WOULD THE PROPOSAL DO? This proposal would extend the black bear baiting season by two weeks in Unit 1D, to June 30, which would align with the hunting season for black bears.

WHAT ARE THE CURRENT REGULATIONS?

Hunting Seasons	Bag Limit
Sept. 1 – June 30	Resident hunters: 2 bears, not more than 1 of which may be a blue or glacier bear
Sept. 1 – June 30	Nonresident hunters: 1 bear

Bear baiting season (Unit 1D): April 15- June 15.

There is a positive C&T finding for black bears in Unit 1D and an ANS of 10-20 black bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, bait would be allowed in the field for an additional two weeks, which would likely lead to increased harvest. Both the baiting and black bear hunting seasons would end on the same date which may reduce confusion for hunters.

BACKGROUND: Black bear baiting became legal year-round in 1982. The current bear baiting season dates in Unit 1D (April 15–June 15) have been in effect since 1988, which is identical to season dates for Units 1A, 1B, 1C, 2, 3, 5, 6B and 6C.

Most black bears in Unit 1D are harvested by local hunters during the spring (April–June) when the bear baiting season is open. From regulatory year (RY) 2012–2021 spring hunters harvested 224 bears (181 males, 43 females) which was 81% of the total harvest of 276 bears (212 males, 64 females). Most bears harvested in Unit 1D are not taken over bait (Figure 35-1). Meat salvage is not required in the fall (September 1–December 31). However, 96% of successful fall hunters salvaged the meat and only 2 hunters did not salvage meat during the same ten-year period. This demonstrates the importance of black bears as a food resource. From RY 2012-2022, only 4% of spring hunters harvested bears from June 16–June 30, which is the proposed bear baiting extension.

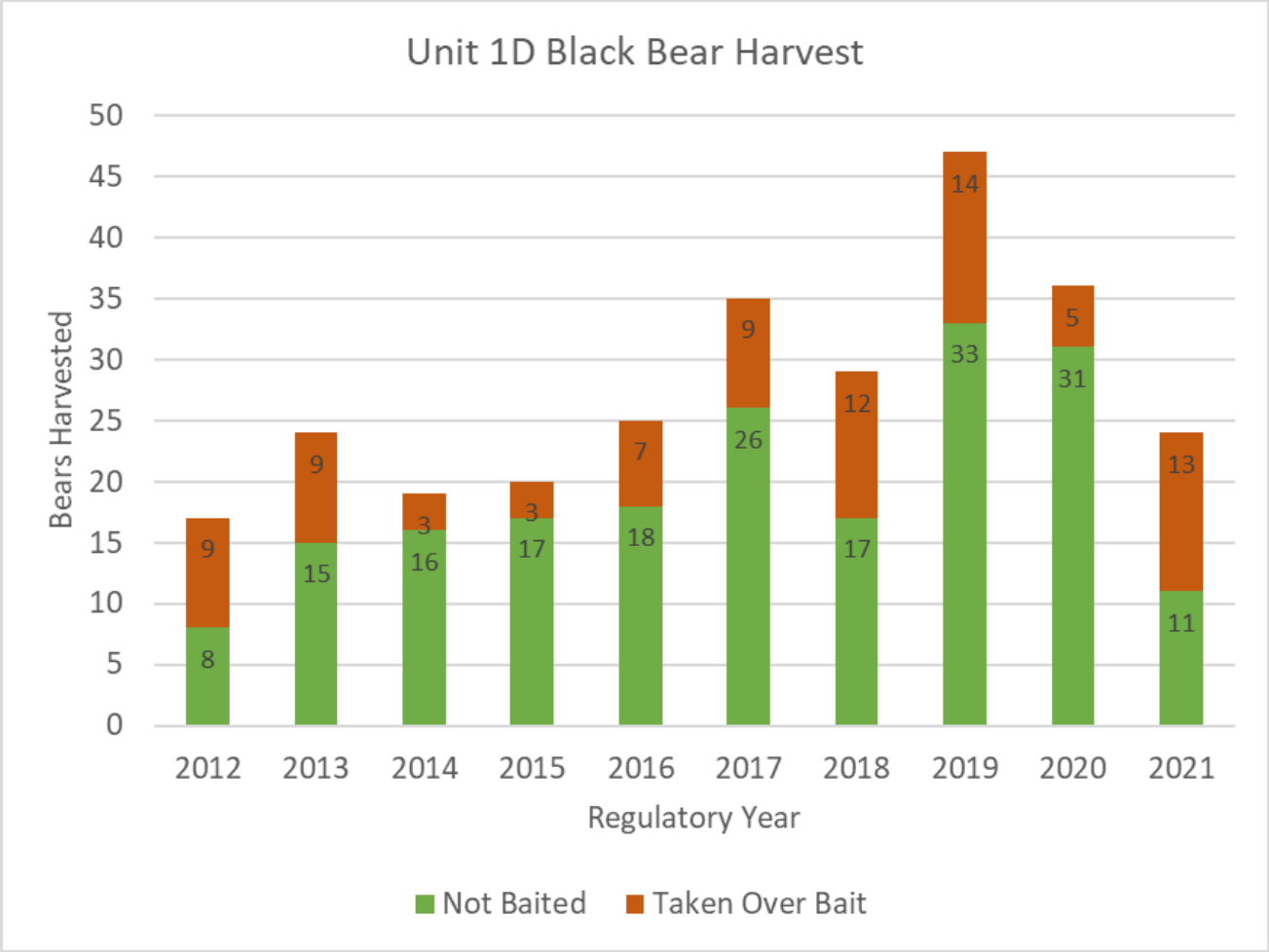

Figure 35-1. Comparison black bear harvest over bait vs. bears not taken over bait RY 2012–2021

In 2002, a proposal to prohibit bear baiting was submitted to the board due to a concern that brown bears were attracted to bait stations and the proximity of bait stations to human development may contribute to conditioning bears to human food and refuse. In response, the board closed baiting within 1 mile of all major roads in Unit 1D. In 2015, a proposal was submitted to delay the black bear baiting season until after the brown bear season closed (May 31). The public were concerned about illegal take of brown bears over black bear bait stations, and that some black bear hunters might set up bait stations near brown bear hunting camps.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. Bear meat has been sought after in the Haines area as a substitute for other species not found in this unit, such as deer, and because of this black bears are a more coveted species than in other parts of Southeast Alaska. Some hunters have expressed concern about sustainability of the population after 44 black bears were harvested during the spring of RY 2019 which was double the 10-year average spring harvest (22 bears). Bear harvest was high across Southeast that spring likely due to more hunter participation because of COVID-19. Harvests in RYs 2020 and 2021 were consistent

with the 10-year average.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 36 – 5 AAC 85.065 (a)(1) Hunting seasons and bag limits for small game.

PROPOSED BY: Peter Robertson

WHAT WOULD THE PROPOSAL DO? Reduce the bag limit of grouse to 3 per day for the drainages that cross the Juneau-Douglas road system.

WHAT ARE THE CURRENT REGULATIONS? Units 1 – 5; 5 per day, 10 in possession Resident and nonresident open season: Aug. 1 – May 15.

The proposal area is within the Juneau Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal might limit the harvest of some hunters and allow harvest to be spread among Juneau area grouse hunters.

BACKGROUND: Unlike other areas, sooty grouse hunting in Southeast Alaska is predominantly a spring-time endeavor, when hunters pursue males that "hoot" for mates, often from an exposed perch. Possibly due to better acoustics, grouse often pick a location to call from a precariously perched tree on the edge of cliffs with a steep backdrop. Thus, some birds are relatively easy to access, while others are notoriously impossible to reach. Throughout the spring season, easy-access birds are harvested more often, while birds in steep, difficult terrain tend not to be harvested. Some popular and easy access areas on the Juneau-Douglas road system get a lot of hunting pressure during this hunt (Figure 36-1). This proposal would also change the bag limit in the fall. Because sooty grouse are fairly cryptic, fall harvest tends to be low and often includes juvenile birds. Fall harvest tends to have minimal impact on population levels or hunt quality for other hunters.

Spring grouse counts have been lower over the last two years (Table 36-1), with the last count (2022) being the lowest count since surveys began in 2015. It is unknown whether spring harvest in popular hunting areas has significant impact on overall population abundance. Aside from human harvest, the weather pattern within 2-3 weeks of the hatch is a big factor in grouse abundance.

This proposal could allocate harvest among more hunters by reducing the daily bag limit, although the department has no data to suggest hunters harvest more than 1-2 birds a day. Grouse are commonly thought of as a "starter species" that are good for beginning hunters to pursue and learn

about hunting. Limiting the harvest to 3 birds/day may allow beginning hunters and older hunters with reduced mobility greater opportunity to harvest a grouse.

Table 36-1. Sooty grouse spring breeding survey mean estimates (males per survey stop) and 95% confidence intervals, 2015 – 2022.

	Mean	Confidence Interval	
Year	(males/stop)	Lower	Upper
2015	1.81	1.46	2.29
2016	1.93	1.42	2.47
2017	1.13	0.81	1.46
2018	1.00	0.60	1.49
2019	1.32	0.88	1.82
2020	1.35	0.81	2.05
2021	1.01	0.72	1.34
2022	0.86	0.62	1.17

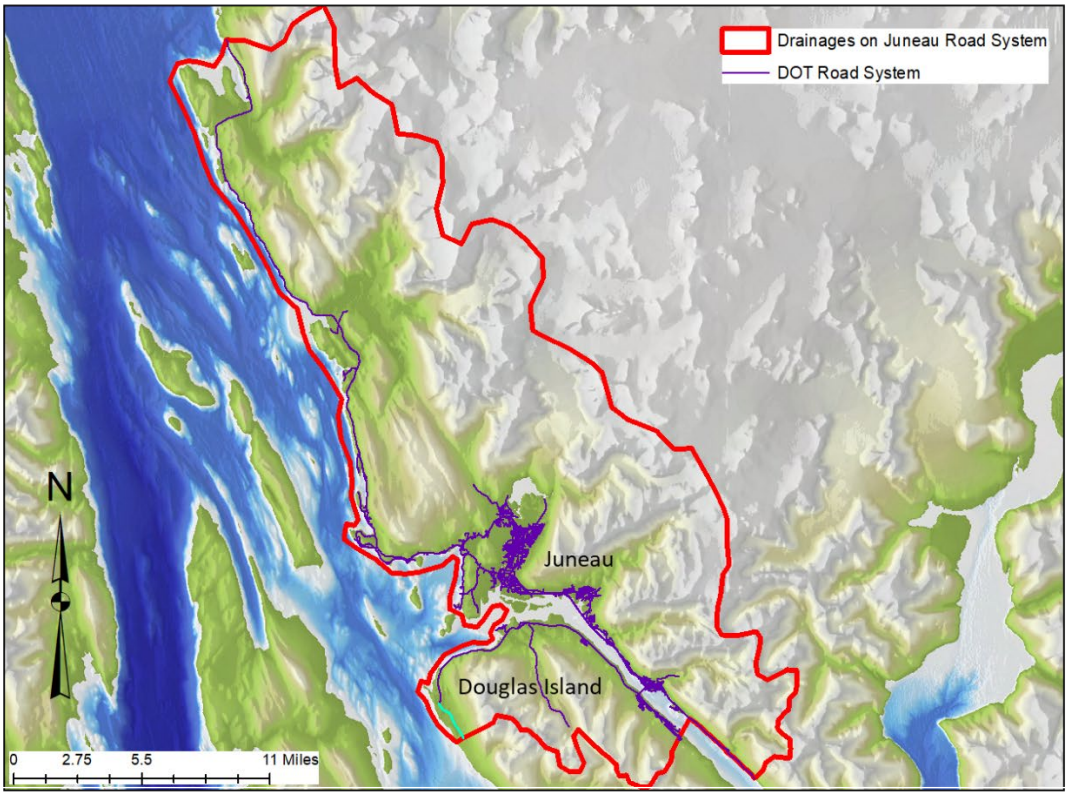

Figure 36-1. A map of the Juneau-Douglas road system and the proposed drainages that would have a reduced bag limit under this proposal.

DEPARTMENT COMMENTS: The department is **OPPOSED** to the reduction in opportunity because there are no conservation concerns for this species in this area; however, given the normally low harvest in this area the proposal is unlikely to impact most hunters' daily take of grouse and will have no impact on the current grouse population.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 37 – 5 AAC 85.065 (a)(3) Hunting seasons and bag limits for small game.

PROPOSED BY: Peter Robertson

WHAT WOULD THE PROPOSAL DO? Reduce the ptarmigan bag limit to 5 per day for the drainages that cross the Juneau-Douglas road system.

WHAT ARE THE CURRENT REGULATIONS? Units 1 – 5; 20 per day, 40 in possession Resident and nonresident open season: Aug. 1 – May 15.

This area is within the Juneau Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal might limit the harvest of some hunters and allow harvest to be spread among Juneau area ptarmigan hunters.

BACKGROUND: Currently, the department has no data on population abundance or productivity of rock, white-tailed, or willow ptarmigan in Southeast Alaska, and only limited household harvest survey data for Southeast ptarmigan: harvests range from zero in some communities in some years, to 236 ptarmigan in Wrangell in 2000, 141 ptarmigan in Craig in 1997, and 347 ptarmigan in Sitka in 2013. Through the statewide wing collection program, it is believed that overall harvest in this area is very low; however, some hunters do pursue ptarmigan in the alpine regions of the Juneau-Douglas area.

If adopted, this proposal has the potential to greatly limit the harvest compared to the current bag limit for areas on the Juneau-Douglas road system (Figure 37-1); however, anecdotal evidence suggests that a harvest greater than 5 birds is rare in the Juneau area. The author's intent is to spread out the harvest among hunters, and that may be one of the effects of this proposal. The proponent suggests suggested that local overharvest is limiting the population in some areas. Poor weather during the nesting season has the greatest impact on upland gamebird populations. Furthermore, good snow conditions for snowmobile use and skiing do not occur every year and so local hunting pressure is variable in the spring depending on winter snow conditions. think that is the normal pattern.

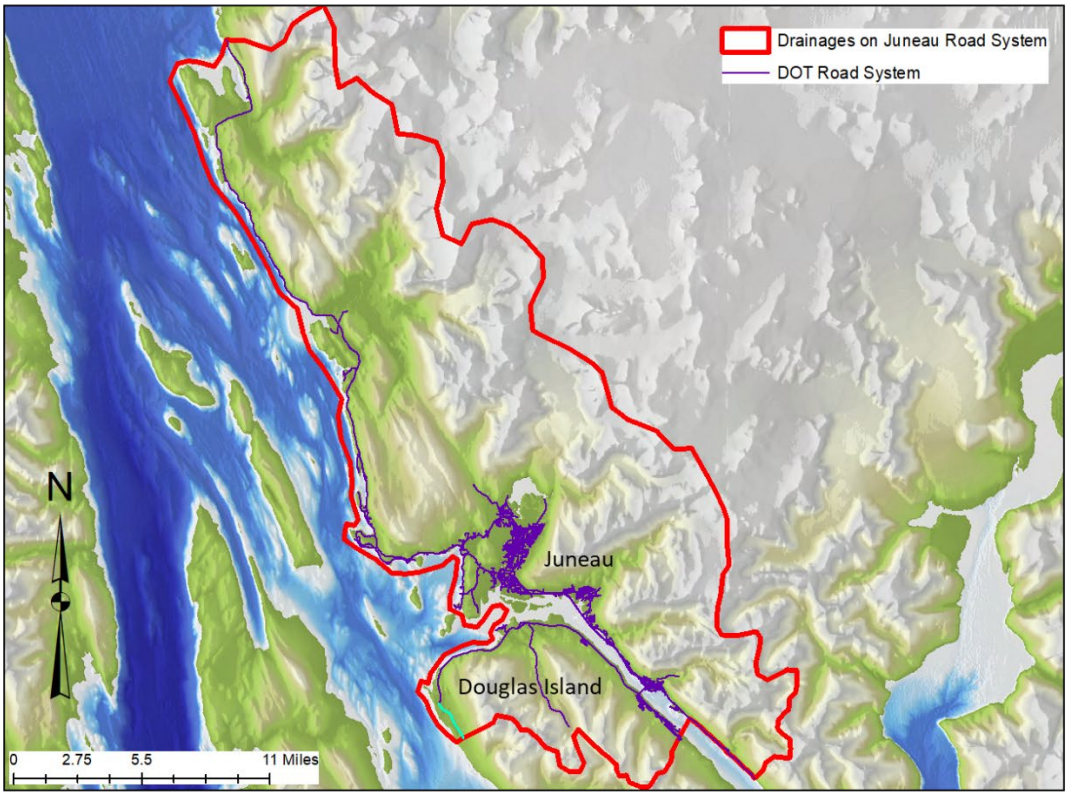

Figure 37-1. A map of the Juneau-Douglas road system and the proposed drainages that would have a reduced bag limit under this proposal.

DEPARTMENT COMMENTS: The department is **OPPOSED** to the reduction in opportunity because there are no conservation concerns for this species in this area. However, given the normally low harvest in this area the proposal is unlikely to impact most hunters' daily take of ptarmigan and will have no impact on the current ptarmigan population.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 38 – 5 AAC 92.520(a) Closures and restrictions in state game refuges.

PROPOSED BY: Erich Schaal

WHAT WOULD THE PROPOSAL DO? The proposal if adopted would allow youth of any age younger than 17 years old to participate in the first 2 days of the waterfowl season youth hunt on the Mendenhall Wetlands State Game Refuge.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.520. Closures and restrictions in state game refuges

(a) Unit 1: The Mendenhall Wetlands State Game Refuge, as described in AS 16.20.034, is closed to hunting, except for waterfowl including snipe and crane during established seasons; a person may not use any off-road or all-terrain vehicle, motorcycle, or other motorized vehicle, except a boat within the refuge; a hunter for waterfowl on the Mendenhall State Game Refuge must have successfully completed a certified hunter education course, except a hunter who is under 10 years of age must be accompanied by an adult, or must have successfully completed a certified hunter education course; before hunting in the refuge, a person must register for a permit annually with the department and demonstrate an understanding of informational materials provided at the time of registration; the permit is valid for all or specific waterfowl hunting zones within the Mendenhall Wetlands State Game Refuge, subject to closure at the discretion of the department; a person convicted of a hunting violation within the Mendenhall Wetlands State Game Refuge is not eligible to register for a permit to hunt in the refuge the following year; a hunter on the refuge shall present in the field, upon request, proof of registration; the first two days of the established waterfowl season is open to youth hunters ages 10 to 17 only, and both the child and accompanying adult must register with the department.

This area is within the Juneau Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow hunters under the age of 10 to hunt on the refuge during the youth hunt, which is the first two days of the season. Adoption of this proposal would put the Mendenhall Wetlands hunt in line with other small game youth hunts in the state but will conflict with the board's action in 2006 when hunter education was required due to conflicts between hunters and home and business owners bordering the refuge. There are no population impacts expected from the adoption of this proposal.

BACKGROUND: The original proposal that created the Mendenhall Wetlands youth hunt in 2019 included language in the proposal to have a lower age cutoff of 10 years of age based on the requirements of big game youth hunt participants to be at least 10 years old. This language was maintained when the proposal was adopted. Some small game hunts within the state do not have a minimum age requirement, including small game hunts in Units 14 (5 AAC 92.530(30)(B)) and 15 (5 AAC 92.530(6)(B)(ii)(b)).

Since just prior to the initiation of Mendenhall Wetlands youth hunt the percentage of youth participants has been just over 10% of the hunters and instituting this regulation does not seem to have increased youth waterfowl hunter participation on the Refuge (Figure 38-1).

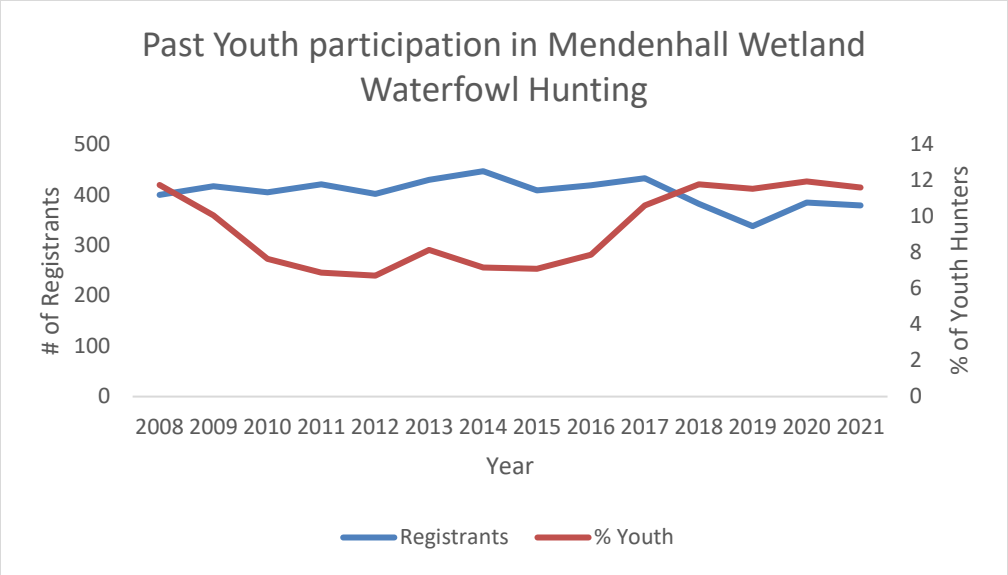

Figure 38-1. Total wetland registrants and percentage of registering youth hunters on Mendenhall Wetlands Game Refuge, RY 08–21.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. This said, the Department supports youth hunt opportunities as a means to pass on hunting heritage. There are no population impacts expected from the adoption of this proposal. Should the board wish to adopt this proposal the department recommends a review of the action requiring hunter education on Mendenhall Wetlands State Game Refuge by the board.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 39 – 5 AAC 92.520(a) Closures and restrictions in state game refuges.

PROPOSED BY: Erich Schaal

WHAT WOULD THE PROPOSAL DO? The proposal if adopted would allow youth younger than 13 to hunt on the Mendenhall Wetlands State Game Refuge without having taken hunter education, if they are accompanied by an adult.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.520. Closures and restrictions in state game refuges

(a) Unit 1: The Mendenhall Wetlands State Game Refuge, as described in AS 16.20.034, is closed to hunting, except for waterfowl including snipe and crane during established seasons; a person may not use any off-road or all-terrain vehicle, motorcycle, or other

motorized vehicle, except a boat within the refuge; a hunter for waterfowl on the Mendenhall State Game Refuge must have successfully completed a certified hunter education course, except a hunter who is under 10 years of age must be accompanied by an adult, or must have successfully completed a certified hunter education course; before hunting in the refuge, a person must register for a permit annually with the department and demonstrate an understanding of informational materials provided at the time of registration; the permit is valid for all or specific waterfowl hunting zones within the Mendenhall Wetlands State Game Refuge, subject to closure at the discretion of the department; a person convicted of a hunting violation within the Mendenhall Wetlands State Game Refuge is not eligible to register for a permit to hunt in the refuge the following year; a hunter on the refuge shall present in the field, upon request, proof of registration; the first two days of the established waterfowl season is open to youth hunters ages 10 to 17 only, and both the child and accompanying adult must register with the department.

This area is within the Juneau Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? There are no population impacts expected from the adoption of this proposal. This proposal would allow younger hunters who have not completed a hunter education class to hunt on the refuge with adult supervision.

BACKGROUND: In reviewing the impacts of the hunter education requirement, there is a mismatch in the age requirement for young hunters and when the class is taught in school. This misalignment in ages does not preclude youth from taking the hunter education course prior to when it is offered by public education and there are many opportunities for them to do that through the department's Hunter Information and Training program at the Juneau Hunter Education Facility. Courses are now taught mostly online with 4 hours of field instruction. Throughout the state, the age for required hunter education is 10 years old, and this would be the first exception to that.

There may still be a need for early age hunter education on this hunt. In 2006 the board adopted the requirement for hunter education and the registration permit to address issues with hunter safety and unsafe shooting. Prior to the board adopting the existing education and registration requirements, the department worked with the City and Borough of Juneau to continue to allow hunting on the refuge once the department came up with a plan to improve safety going forward, which included in part hunter education and registration of hunters that were required to take a safety quiz to get the permit.

Since just prior to the initiation of Mendenhall Wetlands youth hunt the percentage of youth participants has been just over 10% of the hunters and instituting this regulation does not seem to have increased or decreased youth waterfowl hunter participation on the Refuge (Figure 39-1).

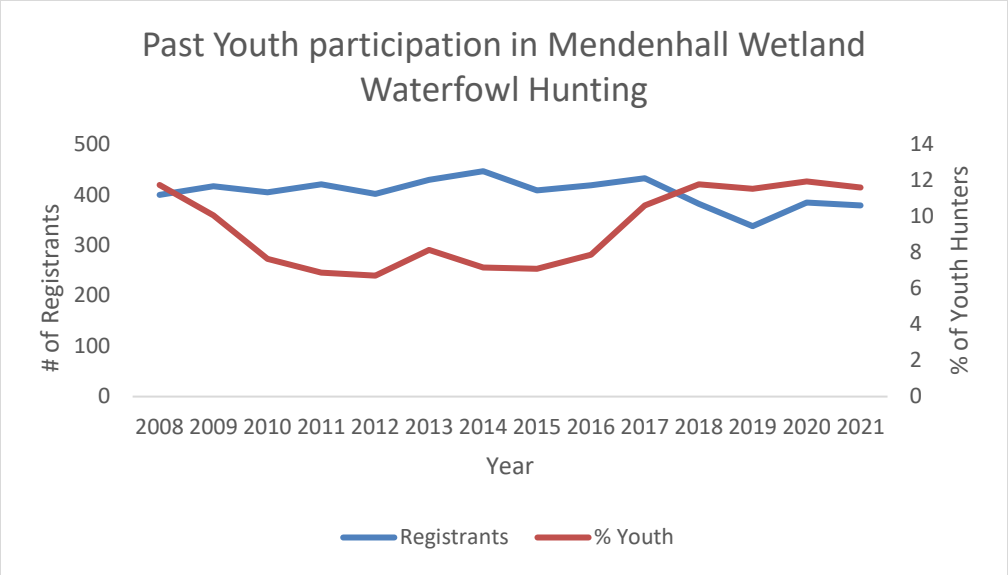

Figure 39-1. Total wetland registrants and percentage of registering youth hunters on Mendenhall Wetlands Game Refuge, RY 08–21.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. This said, the Department supports youth hunt opportunities as a means to pass on hunting heritage. There are no population impacts expected from the adoption of this proposal. Should the board wish to adopt this proposal the department recommends the action requiring hunter education on Mendenhall Wetlands State Game Refuge be reviewed by the board.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 40 – 5 AAC 92.520(a) Allow the take of deleterious exotic wildlife in the Mendenhall Wetlands State Game Refuge.

PROPOSED BY: Erich Schaal

WHAT WOULD THE PROPOSAL DO? If adopted this proposal would allow for the hunting of deleterious wildlife on the Mendenhall Wetlands with shotgun or pellet gun with a year-round season.

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 92.520. Unit 1: The Mendenhall Wetlands State Game Refuge, as described in AS 16.20.034, is closed to hunting, except for waterfowl including snipe and crane during established seasons; a person may not use any off-road or all-terrain vehicle, motorcycle, or other motorized vehicle, except a boat within the refuge; a hunter for waterfowl on the Mendenhall State Game Refuge must have successfully completed a certified hunter education course, except a hunter who is under 10 years of age must be

accompanied by an adult, or must have successfully completed a certified hunter education course; before hunting in the refuge**,** a person must register for a permit annually with the department and demonstrate an understanding of informational materials provided at the time of registration; the permit is valid for all or specific waterfowl hunting zones within the Mendenhall Wetlands State Game Refuge, subject to closure at the discretion of the department; a person convicted of a hunting violation within the Mendenhall Wetlands State Game Refuge is not eligible to register for a permit to hunt in the refuge the following year; a hunter on the refuge shall present in the field, upon request, proof of registration; the first two days of the established waterfowl season is open to youth hunters ages 10 to 17 only, and both the child and accompanying adult must register with the department.

This area is within the Juneau Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Year-round hunting of deleterious wildlife would be allowed on the Mendenhall Wetlands Refuge, resulting in increased conflict between user groups. The known deleterious wildlife on the refuge are starlings, pigeons, and Eurasian collared doves. Hunting these birds on the refuge would not decrease their populations in the Juneau area. This proposal would also allow for the previously prohibited pellet gun to be used on the Refuge, resulting in safety concerns.

BACKGROUND: For many years, hunting for waterfowl, cranes, and snipe has been allowed during the waterfowl hunting season on the Mendenhall State Game Refuge if hunters registered with the department. Hunters were in danger of losing this privilege after safety concerns were raised with the City and Borough of Juneau after houses and a tourist bus were shot by waterfowl hunters. This issue was discussed at the 2006 board meeting, at which time the board adopted the requirement for hunters to obtain a registration permit which included a requirement for the hunter to pass a quiz and to have successfully completed a hunter education course. At the same time, young hunters were allowed to participate if they were accompanied by an adult who had completed hunter education. Hunting has continued on the refuge, but it took many years of negotiating with the City and Borough of Juneau and adoption of these restrictions to help ensure the safety of homeowners who border the refuge.

The author of this proposal would like the season for deleterious wildlife to continue year-round. Conflict among user groups is quite common on the refuge. In the greater Juneau area, the refuge is a very popular recreational area and at times there are a lot of people on the refuge participating in multiple activities. Most conflicts stem from interactions among hunters, wildlife watchers, and dog walkers. The waterfowl hunting season is the time of year when the least number of non-hunters use the refuge. To expand the hunting season year-round would extend these conflicts to an all-year occurrence and could exacerbate the problem when there is higher nonconsumptive use of the refuge.

This proposal would also allow for the use of a pellet gun on the refuge, which has been prohibited in City and Borough of Juneau (CBJ) code 42.20.050 since 2000. CBJ code only allows for the

discharge of shotguns on the Mendenhall Wetlands State Game Refuge. The department provided guidance to the CBJ during development of this code. The department does not recommend the use of pellet guns in an area where, in the past, there have been issues with hunters shooting toward houses. Furthermore, unlike waterfowl, deleterious wildlife like starlings and pigeons are likely to fly toward houses instead of following typical flight lines of waterfowl that end in ponds and waterways of the refuge. These flights toward houses and upland forests might be more likely to lead shooters to shoot in an unsafe direction.

The small size of the refuge does not lend itself to increased shooting. During busy waterfowl weekends, there are large numbers of hunters on the refuge and increasing hunter activity focused on deleterious wildlife could negatively impact the hunting experience of waterfowl hunters.

The proponent of this proposal also suggested that these species are detrimental to native refuge species, which is not the case. Starlings do occupy nesting cavities, but the refuge is a wetland for the most part and cavity nesting birds do not make up a significant portion of the bird life on the refuge. The author mentions mountain bluebirds, which do nest in cavities and have been impacted by starlings, but bluebirds are only a spring migrant on the refuge and do not nest there. There are tree swallows that nest in nest-boxes around the perimeter of the refuge, but it is common practice to make the entrance hole into nest boxes too small for starlings to enter.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal based on the potential to increase conflict among users. The proponent of this proposal has suggested that the current level of caution regarding discharge of weapons is no longer needed, but the department disagrees and still receives complaints involving gun safety, and extra caution is still warranted. A single misplaced shot in this area would be devastating if someone was harmed. The department strongly supports the removal of deleterious exotic wildlife from state lands, but not at the expense of safety and the hunter experience.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 41 – 5 AAC 92.530(23) Eliminate the Douglas Island Management Area in Unit 1C.

PROPOSED BY: Juneau Douglas Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would remove the Douglas Island Management Area for wolves in Unit 1C from regulation, which currently limits the take to no more than 5 wolves annually on Douglas Island, requires trapper registration, 48-hour harvest reporting, and hides must be sealed within 5 days of harvest.

WHAT ARE THE CURRENT REGULATIONS?

Douglas Island Management Area:

(A) The management area consists of Douglas Island in unit 1(C);
(B) hunting and trapping of wolves is open in the Douglas Island Management Area and, except as specified in (E) and (F) of this paragraph, the harvest cap for hunters and trappers is five wolves; hunting and trapping seasons will be closed by emergency order when five wolves have been harvested;
(C) before trapping wolves in the management area, a person must register with the department; a hunter or trapper who takes a wolf in the management area must report the harvest to the department's division of wildlife conservation office in Douglas within 48 hours of taking the wolf and present the hide for sealing with five days of taking the wolf;
(D) if the department determines that any or all of the following conditions were met during the most recent deer hunting season, deer conservation provisions will be implemented:
    (i) more than 11 hunter-days were expended per deer harvested on Douglas Island during the most recent hunting season;
    (ii) the average deer harvest-per-deer-day during the three most recent hunting season was lower than the base average with at least 95 percent statistical confidence
    (iii) the deer population is below the base average, but is likely to increase to near the base average within two years if deer conservation provisions are implemented;
(E) the average deer-harvest-per-hunter-day during 1983 – 2003 will be used as a base measurement to determine if deer conservation provisions will be implemented by increasing or lifting the wolf harvest cap during the remainder of the current wolf season and the following seasons: if the department evaluates available information on the Douglas Island deer population and determines that recent harvest-hunter-day statistics do not accurately reflect the status of the deer population and that the population is not significantly below the base average, the department may decide whether or not to implement deer conservation provisions;
(F) regardless of whether conditions in (D) of the paragraph are met, if the department determines that a significant deer decline has occurred or is likely to occur, the department will increase the wolf bag limit and harvest cap as necessary to avoid a decline or rebuild the deer population; as part of this determination, the department will attempt to prevent extirpation of wolves and maintain some level of wolf protection on Douglas Island;

This area is within the Juneau Nonsubsistence Area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow for continuous wolf hunting and trapping on Douglas Island for the full season as listed in the current Alaska hunting and trapping regulations. The increase in opportunity (i.e., not closed after 5 wolves are taken) may result in additional wolf harvest but it is difficult to estimate the increase due to the transient nature of wolves between Douglas and the mainland.

BACKGROUND: The Douglas Island Management Area was adopted in 2002 to address concerns of wolf extirpation on Douglas Island, and the management area regulations were

amended during the 2004 board meeting to limit the annual harvest to 3 wolves, then amended again in 2019 to increase the annual harvest to 5 wolves. Since 2004, only one Emergency Order has been issued (December 2016) to close the wolf hunting and trapping seasons on Douglas Island due to reaching the 3-wolf limit. There was a proposal to remove the Douglas Island Management Area at the 2019 board meeting. The Juneau Douglas Fish and Game Advisory Committee voted to support the elimination of the management area in a split vote (10/1), but there was also an outpouring of support from the Juneau public to keep the management area at that board meeting. The board kept the management area in place but increased the annual harvest from 3 to 5 wolves. Since the 5-wolf limit went into effect in July 2019, only one wolf has been harvested from Douglas Island.

Wolf harvest across Unit 1C increased between 2016 and 2019 (Figure 41-1), but now it seems that harvest has declined closer to levels found earlier in the analysis period.

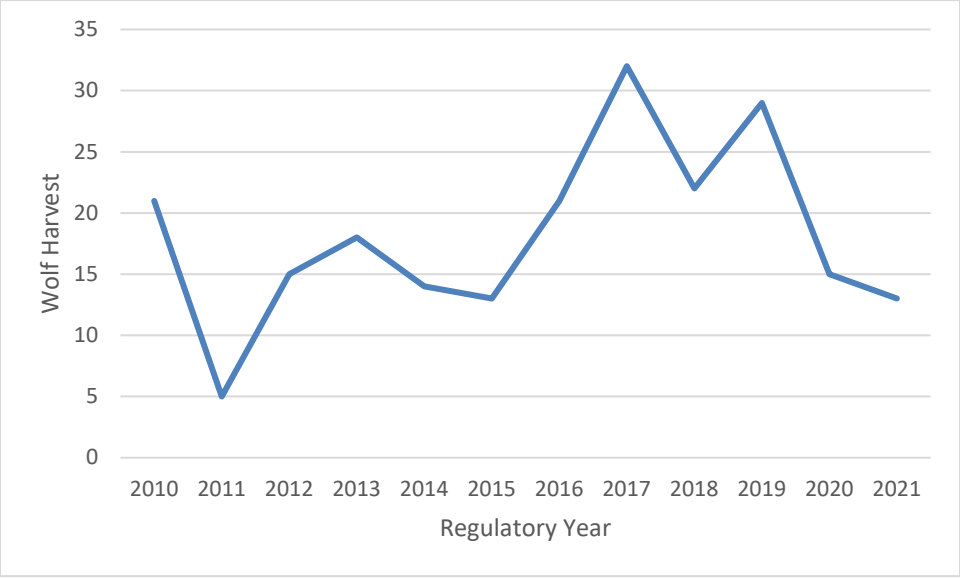

Figure 41-1. Wolf harvest in Unit 1C, Regulatory Year 2010 – 2021.

Following a decade of absence, or use by only individual wolves, a breeding pack is thought to have occupied Douglas Island in 2013. At about 77 square miles, Douglas Island is smaller than typical wolf pack territories documented elsewhere in Southeast Alaska (average ~125 square miles), suggesting that Douglas Island is part of a pack territory and that pack members may move between the island and mainland. There has been little indication that movement off the island has occurred over the past few years. The number of wolves using Douglas Island is unknown. Since regulatory year 2020, only one wolf has been harvested on the island in part due to difficult trapping conditions the last two years. Other wolf harvest in 2020 & 2021 were from mainland areas. At one point during the last two years, when tracks were visible in the winter snow, there were thought to be at least 7 wolves on the island, but the department does not currently have an educated estimate of the population.

The Douglas Island Wolf Management Plan provides direction as to when to allow additional wolf harvest beyond 5 animals. These directions provide deer harvest-related thresholds. A review of the Douglas Island deer conservation conditions reveals:

i) Over the last three years the days of hunter effort required to harvest one deer has increased (2019 = 7.7; 2020 = 8.1; 2021 = 10), but it is still under the 11 hunter-days threshold.

ii) The 1983-2003 average deer-harvest-per-hunter-day = 0.13. The averages for the last three hunting seasons are 2019 = 0.13, 2020 = 0.12, and 2021 = 0.10 deer-harvest-per-hunter-day (average 2019-2021 = 0.12).

iii) The department does not have an estimate of the deer population, but has used deer pellet count surveys as an index of the deer population. Because pellet survey results can be influenced by snow fall patterns, pellet persistence, deer distribution, and timing of leaf-out, they are only considered reliable indicators of substantial (≥30%) changes in the population. Also, the surveys do not cover the entire base measurement time-period. There are two deer pellet count locations on Douglas Island (Figure 41-2). The North Douglas site has baseline measures between 1991 and 2010 (average = 1.34 pellet groups/plot), and the Inner Point site has baseline measures between 1985 and 2010 (average = 1.47 pellet groups/plot). North Douglas pellet count average for the last 3 years is 0.86, and for the Inner Point the pellet count average is 1.04.

These numbers may indicate that deer conservation provisions are warranted, and harvest has declined, but hunter participation has also declined and seems to be the best explanation of reduced harvest (Figure 41-3). During regulatory years (RY) 2012–2021, deer harvest on Douglas Island ranged from 192 to 272 and averaged 216 deer per year, which is below the twenty-year reference average of 303 (RY1983–2003). Over the last 5 years, hunter success ranged from a low of 22% in 2018 to a high of 31% in 2020 with an average of 26%, which was similar to the ten-year average of 27%. The days of hunting effort required to harvest a deer ranged from 7.7 days in RY2019 to 10.0 days in 2021 (average = 8.8 day). In summary, based on these indicators, the department believes that deer numbers are likely down on the island, but some of these indicators are confounded by decreased hunter participation.

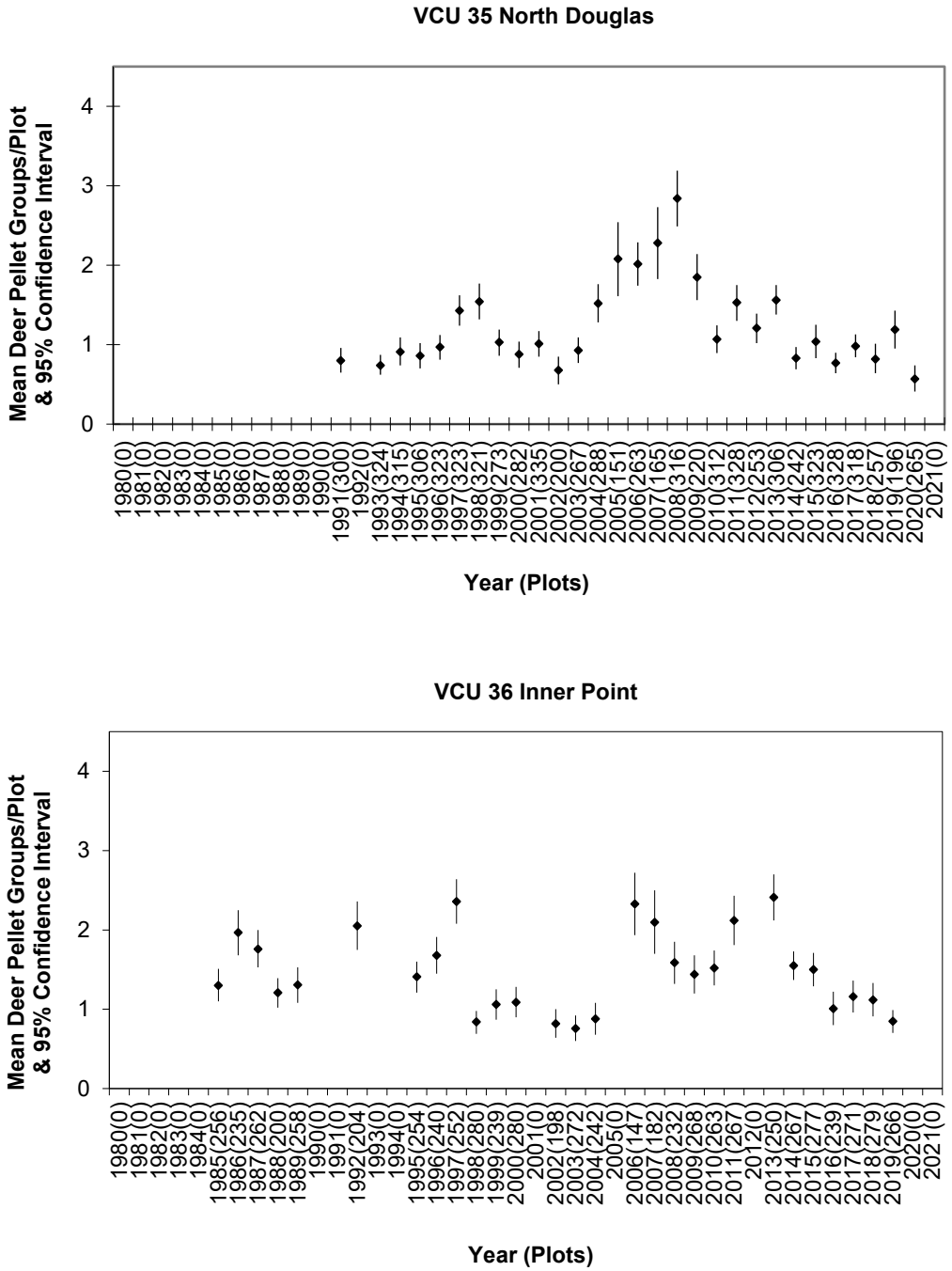

Figure 41-2. Deer pellet transect result from North Douglas and Inner Point on Douglas Island.

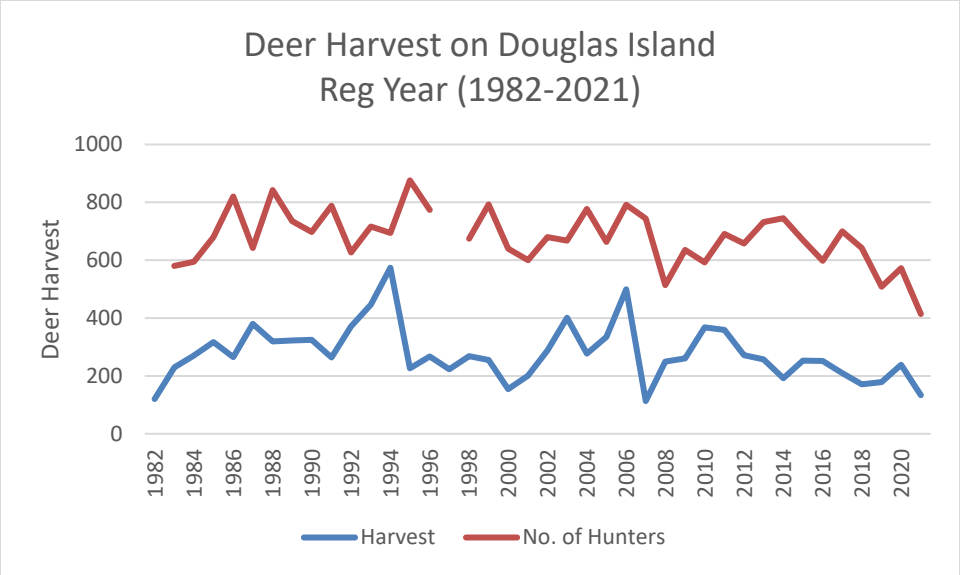

Figure 41-3. Harvest and hunter participation in the Douglas Island deer hunt 1982 – 2021.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Adoption of this proposal will likely not result in a significant increase in the wolf harvest on Douglas and is not anticipated to negatively impact the wolf population in Unit 1C.

COST ANALYSIS: Adoption of this proposal would not result in additional costs for the department.

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PROPOSAL 42 – 5 AAC 85.030. Extend the deer hunting season in Unit 1A Remainder.

PROPOSED BY: Ed Toribio

WHAT WOULD THE PROPOSAL DO? The Unit 1A Remainder deer season would be August 1–December 31. The Cleveland Peninsula south of the divide between Yes Bay and Santa Anna Inlet would remain August 1–November 30.

WHAT ARE THE CURRENT REGULATIONS?
For resident and non-resident hunters, in Unit 1A on the Cleveland Peninsula south of the divide between Yes Bay and Santa Anna Inlet: two bucks, August 1–November 30.

Resident and non-resident, Unit 1A Remainder: four bucks, August 1–November 30.

There is a positive C&T finding for deer in Unit 1A outside of the Ketchikan Nonsubsistence Area, and an ANS of 5-40 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would extend the Unit 1A deer hunting season by 31 days to end on December 31. A season extension would result in a slight increase in deer harvest.

BACKGROUND: During the board's 2010 meeting, Proposal 6 shortened the Unit 1A deer season from ending December 31 to ending November 30. This was in response to consistently low harvest since 1999. Winters with deep snow that persisted into the spring, coupled with altered habitat from clear-cut logging and multiple predators, kept deer numbers low from the late 1990s to the mid-2010s.

In the last 10 years, harvest and the number of hunters in Unit 1A has increased, and the average time it takes to harvest a deer has decreased (Figure 42-1). Mild winters have contributed to the increased deer population in Unit 1A. The main factor that decreased the deer population was a series of winters with deep persistent spring snow from 1995–1998. Habitat remains a challenge in areas near Ketchikan that are popular with hunters. Thick second-growth forests often have fewer deer and makes spotting deer difficult because of dense stands of trees. Despite these challenges, harvest has increased steadily since 2012. Both wolves and black bears prey on deer. Predator populations seem to be stable and have no indications of depressing the deer population. Wolf harvest shows a steady trend from 2012–2021 with an average of 27 harvested wolves. Black bear harvest has slowly climbed since 2012 with an average harvest of 68 from 2012–2020. Deer harvest in Unit 1A is at an ~25–year high, and winters have been mild. The department is currently meeting the Intensive Management harvest objective of 700 deer (Figure 42-1).

If adopted, the proposal would likely result in little additional harvest. Prior to the 2010 regulatory change, an average of 13 deer were harvested in December under state regulations. Under federal subsistence regulations, from 2012–2021, an average of 1 deer was harvested in December by federally-qualified users (Figure 42-2). The majority of Unit 1A residents are non-federally qualified. Most of the deer harvest occurs during late October and early November which coincides with the rut. Opening a December hunt in Unit 1A would also align the deer season with a portion of Unit 1, Unit 2, and Unit 4.

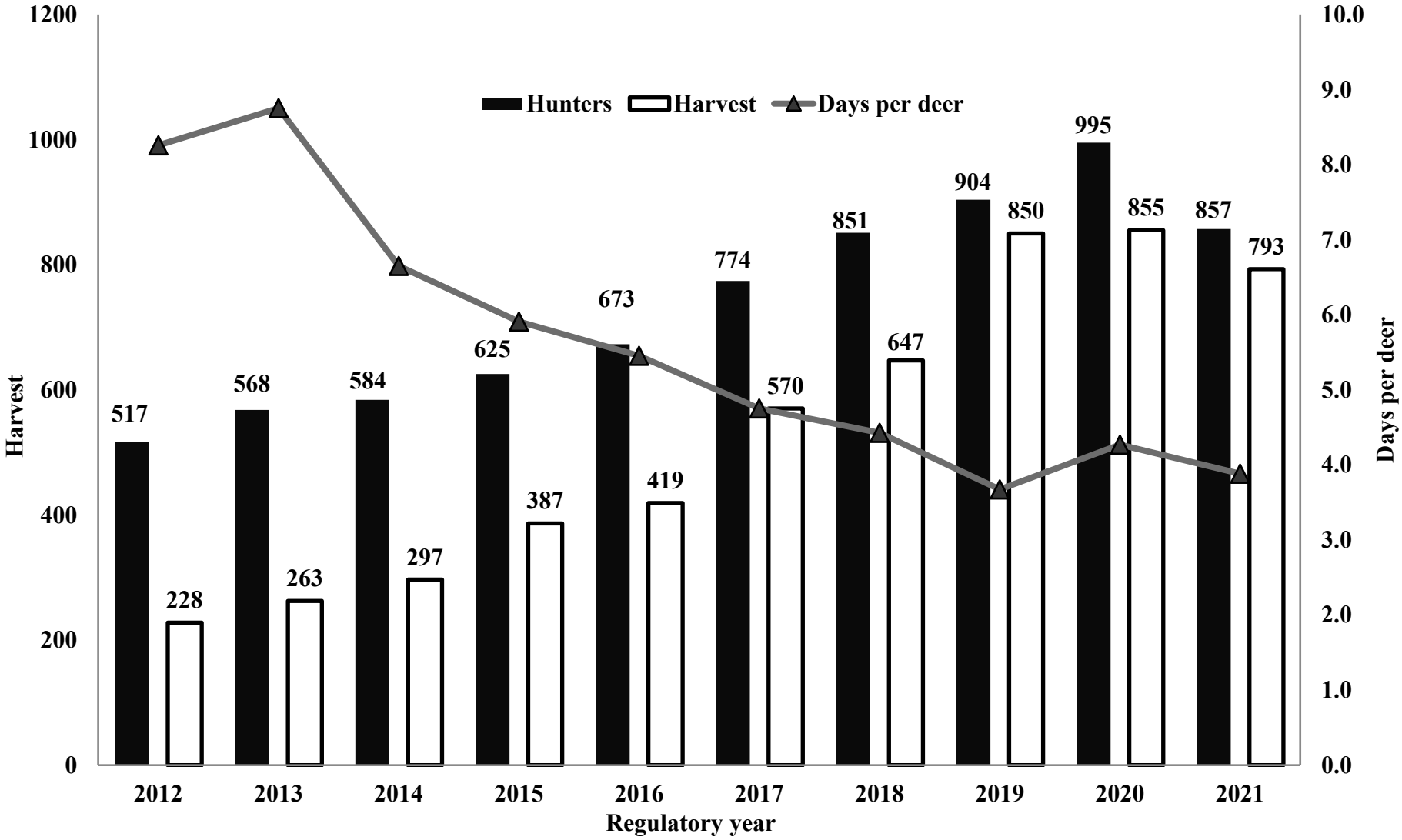

Figure 42-1. Unit 1A deer harvest from 2012–2021. The total number of hunters, deer harvested, harvest objective of 700, and average number of days it takes to harvest one deer (days per deer) are depicted.

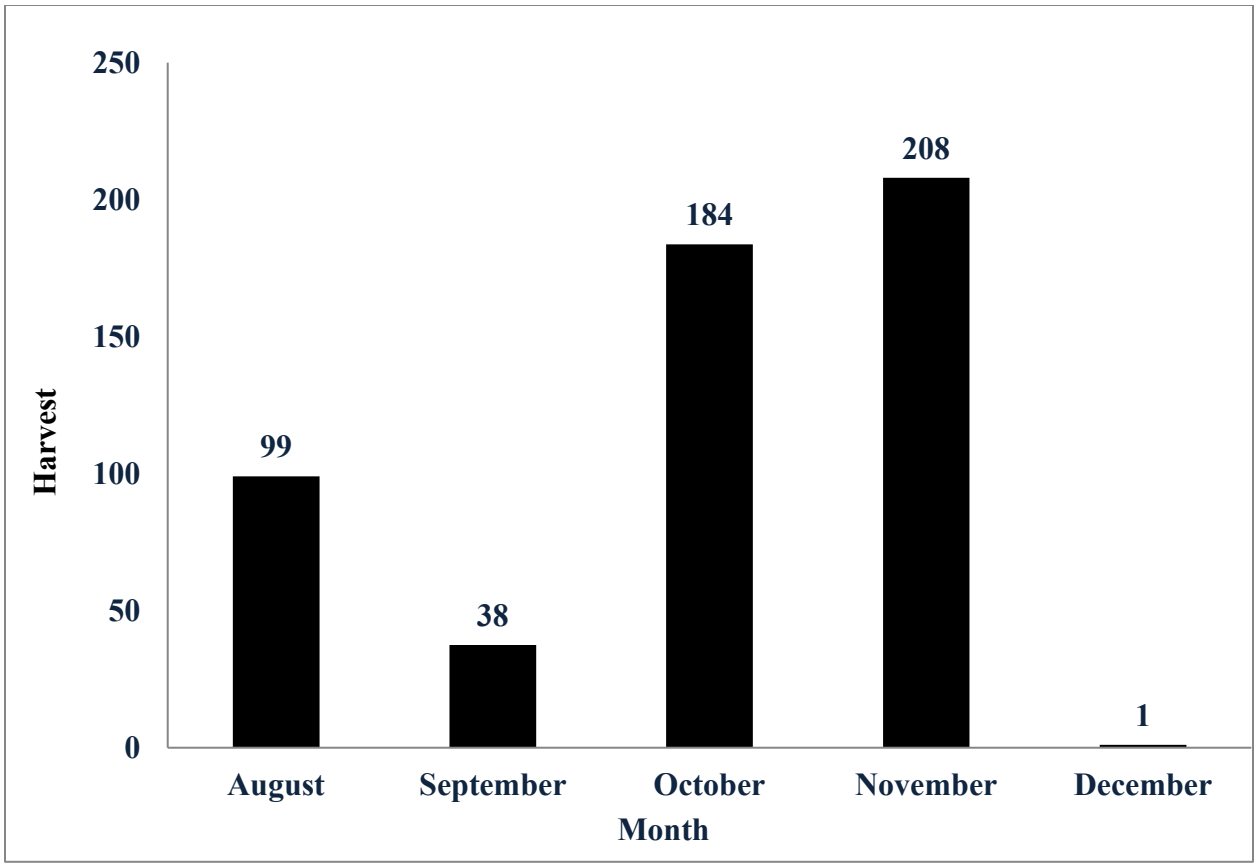

Figure 42-2. Average deer harvest in Unit 1A from 2012–2021, by month.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal since it would not likely cause biological concern for the deer population in Unit 1A.

COST ANALYSIS: Adoption of this proposal is not likely to result in additional costs to the department.

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PROPOSAL 43 – 5 AAC 85.040. Hunting seasons and bag limits for goats.

PROPOSED BY: Ketchikan Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? Increase the resident Unit 1A goat bag limit for RG001 to 2 goats, with some very specific caveats about how a resident can obtain a permit to harvest a second goat, and where residents can harvest, all dependent on harvest of the first goat. Resident RG001 hunters would be allowed to harvest a second goat out of RG001 if their first goat was a billy. The hunter would then be required to present a harvest record or sealing documents in person to staff at the ADF&G Ketchikan office to confirm the billy, then another RG001 permit could be obtained. The hunter would not be allowed to hunt the same trend count area where they harvested their first billy.

WHAT ARE THE CURRENT REGULATIONS?

For residents and nonresidents, in Unit 1A: one goat by registration permit, August 1–December 31.

There is a positive C&T finding for goats in Unit 1A outside of the Ketchikan Nonsubsistence Area, with an ANS of 5-10 goats.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Opportunity for some hunters would increase and decrease for others. If hunters are allowed to harvest two goats per regulatory year it may result in earlier closures in easily accessed trend count areas. Less trend count areas to hunt may result in less opportunity for other hunters.

BACKGROUND: In 2021, the department introduced a new management strategy for mountain goats in Unit 1A to increase opportunity where feasible. The new strategy allows more harvest from the introduced population on Revillagigedo Island than from the native mainland population. The new strategy and old strategy both rely on aerial minimum counts; however, the old strategy had the same management for native and introduced populations of goats.

The department's old strategy had 14 established trend count areas (TCAs; Figure 43-1). A minimum goat density of 20 goats per survey hour was established as an objective for Unit 1A to maintain a harvestable goat population. Guideline harvest levels were established for goats within each TCA. To accomplish this, the department used the number of goats observed within a TCA during annual fall surveys, then applied a guideline harvest of 6 harvest points per 100 adult goats observed. Harvest points were weighted more heavily for females (2 points) than for males (1 point). A weighted point system was applied to the 3-year running average of the annual harvest to determine a guideline harvest level. For example, if 6 points are allowed in a hunt area, then for any given 3-year period, the cumulative points for an area should not exceed 18. In this way, if 7 points are taken one year, and 8 the next, then the third year point allowance would be reduced to 3. Hunt areas that reached the harvest level were closed by emergency order. The only emergency order issued in regulatory year 2001 closed the southern Cleveland Peninsula when goat numbers were low. The old strategy was effective but allowed slightly less harvest opportunity for introduced populations compared to what may be available.

The new strategy provides more hunting opportunity for introduced populations where feasible and is designed to maintain harvestable goat populations. Native and introduced mountain goat populations should be managed differently based on their differing population dynamics. Introduced populations typically have an irruptive growth pattern and high twinning rates, leading to high recruitment and population growth following introduction. Native mountain goat populations can endure less hunting pressure than an introduced population. New TCAs were created to cover all of Unit 1A where mountain goats reside (Figure 43-2) and now there are 43 TCAs which receive varied levels of monitoring. Harvest guidelines are set based on minimum

counts corrected for sightability. Sightability correction yields an estimated count that considers both the animals seen in a survey and those that are likely present but not seen. The estimate is derived from a model that estimates how many goats are not being seen and incorporates that estimate into a final count. To avoid overharvest, harvest of native or introduced populations does not occur below 50 adult goats. Additionally, harvest guideline levels are scaled with each population (Table 43-1). Female harvest is allowed on a sliding scale to reduce impact to the population.

A two-goat bag limit for RG001 was implemented from statehood until it was eliminated during the 2002 board meeting due to conservation concerns (Proposal 21). Minimum counts on the southern Cleveland Peninsula indicated a decrease in the population, in an area popular for goat hunting because of high elevation lakes and closeness to Ketchikan. Hunters harvesting two goats in one year in RG001 from 1987–2002 averaged one hunter per year with a range of 1-5 hunters. The hunter could possess both tags at the same time and harvest two goats simultaneously. Goats are sensitive to overharvest and in order to maintain harvest opportunity for the most hunters, the two-goat bag limit was removed across most of the state. Unit 8 is the only unit currently with a 2-goat bag limit. Unit 8 is unique with a liberal goat season because access is limited and expensive, and the current goal is population control. There is a negative C&T finding for goats in Unit 8.

Currently, federally qualified hunters can harvest two goats from the RG001 area. The first goat must be harvested under a state permit and the second can be harvested under a federal permit. From regulatory years 2012–2021 no goats were harvested under the federal permit. This lack of harvest is likely the result of few people in the Ketchikan area being federally qualified to hunt under subsistence regulations (Ketchikan is a non-rural area under federal subsistence regulations), and the difficulty of a goat hunt.

Goat harvest in Unit 1A remains concentrated on Revillagigedo Island (Revilla) and other areas with easy access to goat habitat. All of Revilla is in the Ketchikan Nonsubsistence Area. Since the introduction and opening of the goat season on Revilla, goat hunting pressure changed from exclusively on the mainland in Unit 1A to most goats being harvested from Revilla. From 2012–2021, 77% of goats taken in Unit 1A were harvested from Revilla. Harvest also depends on weather conditions. Harvest from 2012–2021 ranged from 21–47 goats (Fig. 43-3). Weather conditions were poor in 2021, which resulted in reduced harvest. Despite low harvest in 2021, the department's minimum counts for Revilla remain high. In 2019, the minimum count, including a sightability correction factor, yielded an estimated 404 goats in the DG005 and DG006 areas. Minimum counts on the mainland are typically lower than Revilla since introduced populations, such as goats on Revilla, typically have higher densities, reproduction, and survival rates than the native population on the mainland.

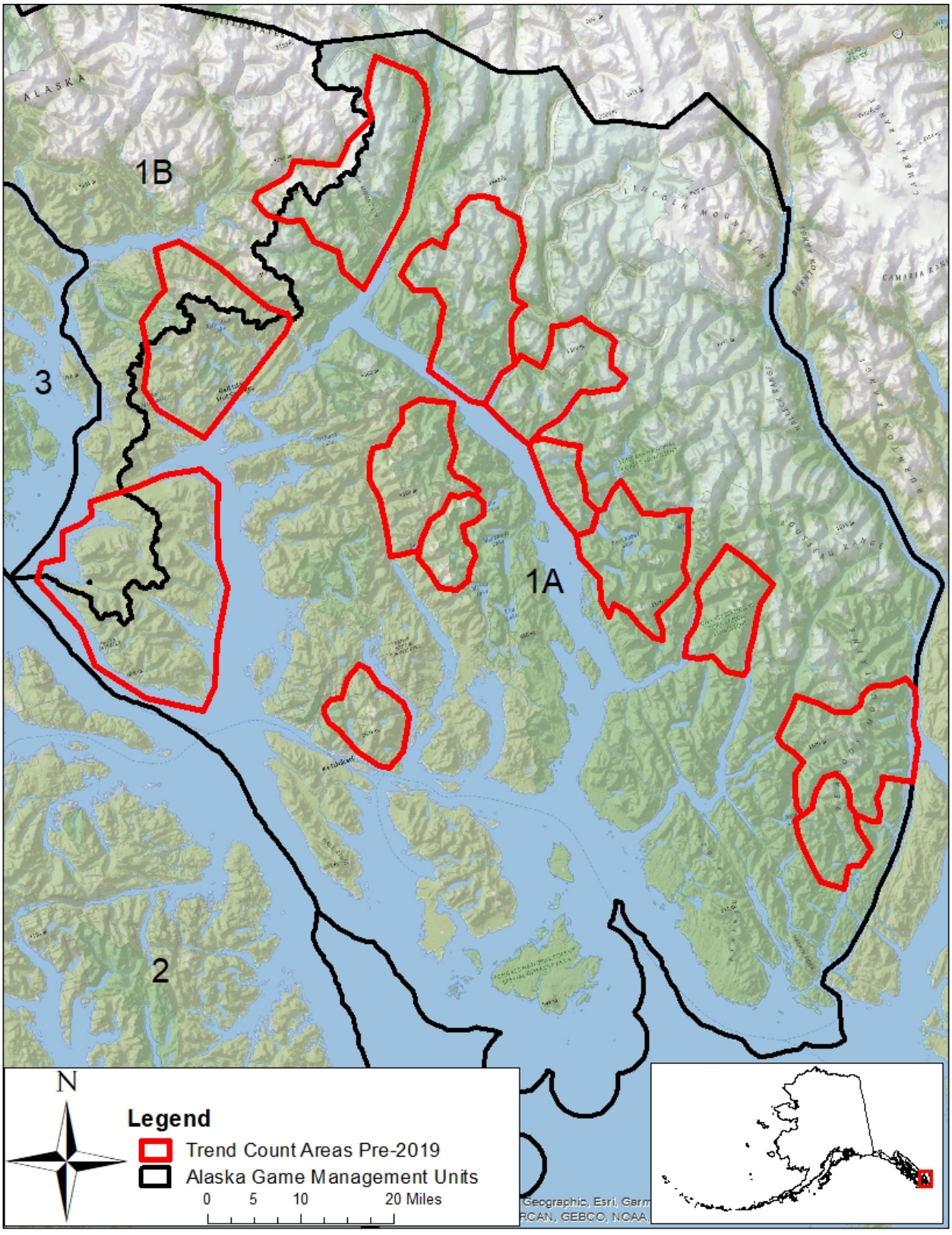

Figure 43-1. Map of Unit 1A historical (“old”) trend count areas for mountain goats, Southeast Alaska.

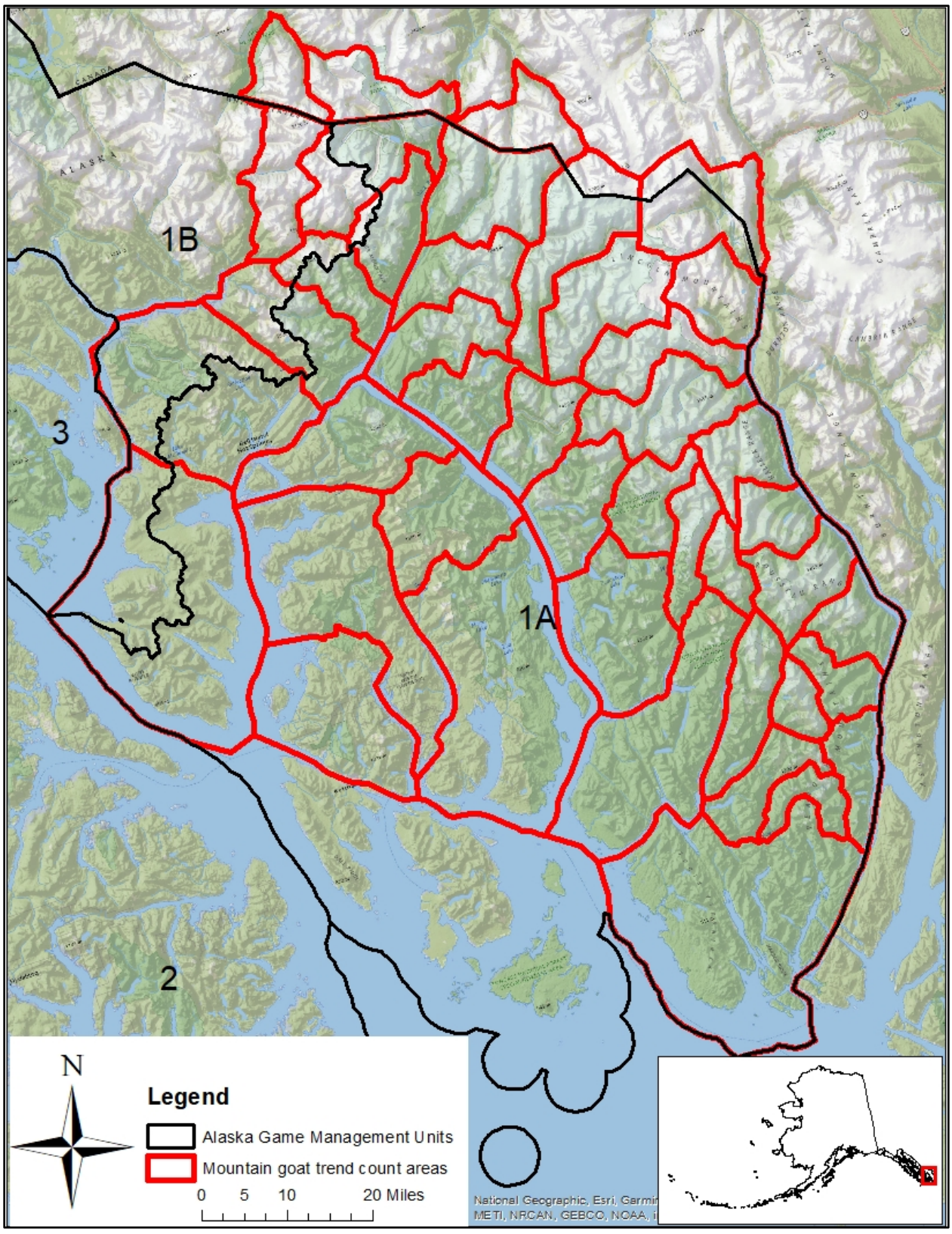

Figure 43-2. Current mountain goat trend count areas, Unit 1A, Southeast Alaska.

Table 43-1. Mountain goat harvest management strategy for Unit 1A, Southeast Alaska.

Population size	Maximum desired harvest rate (%)		Maximum desired female harvest (%)
	Mainland	Revillagigedo Island	
<50 adults	0	0	0
≥50 adults to <100	2	3	≤25
≥100 to <200	3	5	25–30
≥200	4	7	≤30

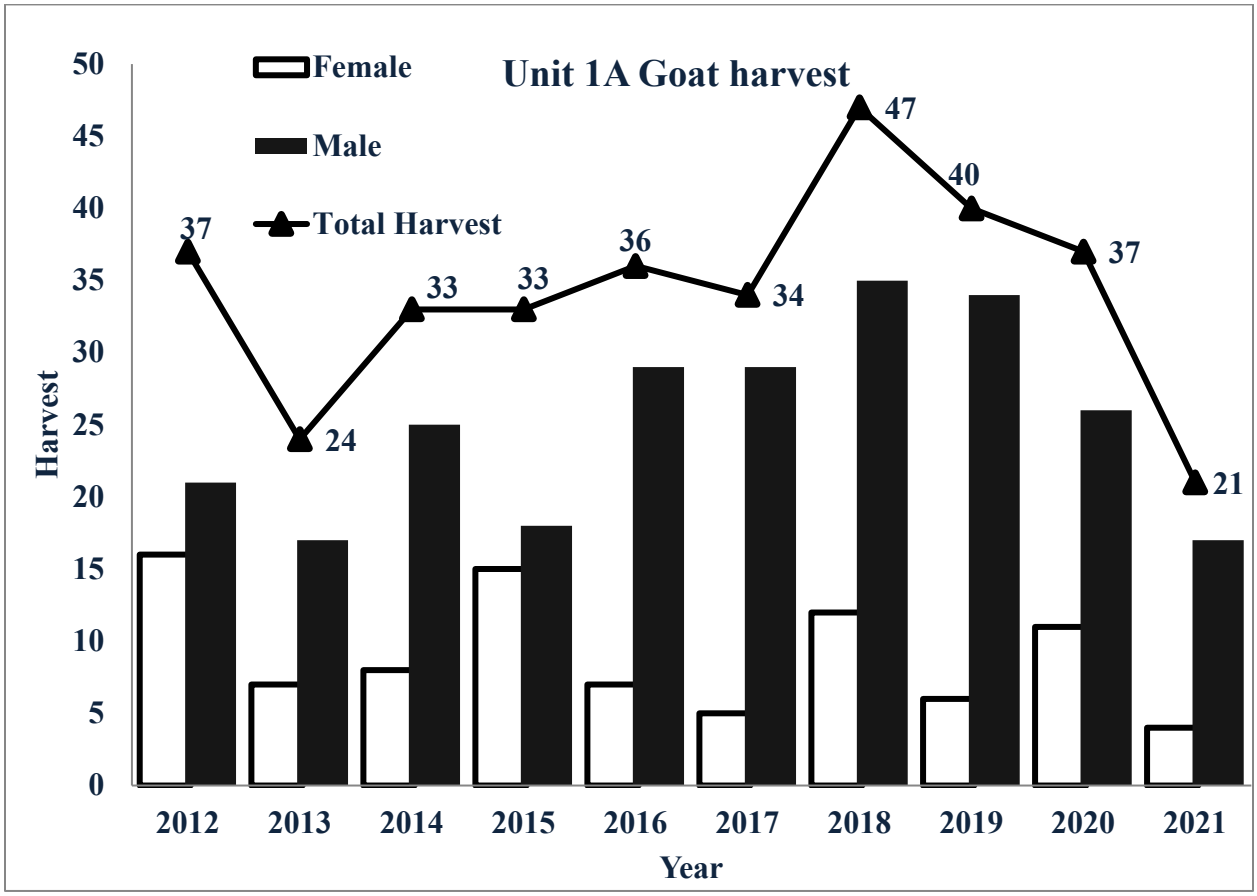

Figure 43-3. Mountain goat harvest 2012–2021, Unit 1A, Southeast Alaska.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal since it is not likely to cause a conservation concern. The department's goal is to allow goat hunting opportunity for the most hunters in as much of Unit 1A as possible though the season. Increasing to a two-goat bag limit may increase harvest which could reduce harvest opportunity in areas of easy access. However, additional restrictions and caveats to issuing additional permits may result in minimal

additional harvest. The department cautions that this proposal would be difficult for hunt administrators and law enforcement to manage and enforce. There is no similar state hunt structure in the state. If this proposal is adopted, it is suggested that hunters present their completed hunt report to the Ketchikan ADF&G office in order to receive another RG001 permit.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

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PROPOSAL 44 – 5 AAC 85.040. Hunting seasons and bag limits for goats.

PROPOSED BY: Ketchikan Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? Extend the RG 001 mountain goat hunting season in Unit 1A Remainder to August 1–January 31. Resident and nonresident goat hunters in Unit 1A would be allowed to hunt an additional 31 days for a total of a 6-month season.

WHAT ARE THE CURRENT REGULATIONS?

For residents and nonresidents, in Unit 1A: one goat by registration permit, August 1–December 31.

There is a positive C&T finding for goats in Unit 1A outside of the Ketchikan Nonsubsistence Area, with an ANS of 5-10 goats.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Hunters may disturb goats further into the winter months. This would disturb goats at a critical time of year when goats are most nutritionally stressed. Stressing goats at this time of year is particularly hard on young, old, and pregnant goats. Increased stress through winter months can decrease survival of goats in vulnerable age classes and increase nannies tendency to terminate pregnancies.

BACKGROUND: In 2021, the department introduced a new management strategy for mountain goats in Unit 1A to increase opportunity where feasible. The new strategy allows more harvest from the introduced population on Revillagigedo Island than from the native population. The new strategy and old strategy both rely on aerial minimum counts; however, the old strategy had the same management for native and introduced populations of goats.

The department's old strategy had 14 established trend count areas (TCAs; Figure 44-1). A minimum goat density of 20 goats per survey hour was established as an objective for Unit 1A to maintain a harvestable goat population. Guideline harvest levels were established for goats within each TCA. To accomplish this, the department used the number of goats observed within a TCA during annual fall surveys, then applied a guideline harvest of 6 harvest points per 100 adult goats observed. Harvest points were weighted more heavily for females (2 points) than for males (1

point). A weighted point system was applied to the 3-year running average of the annual harvest to determine a guideline harvest level. For example, if 6 points are allowed in a hunt area, then for any given 3-year period, the cumulative points for an area should not exceed 18. In this way, if 7 points are taken one year, and 8 the next, then the third year point allowance would be reduced to 3. Hunt areas that reached the harvest level were closed by emergency order. The only emergency order issued in regulatory year 2001 closed the southern Cleveland Peninsula when goat numbers were low. The old strategy was effective but allowed slightly less harvest opportunity than may be available for introduced populations.

The new strategy provides more hunting opportunity for introduced populations where feasible and is designed to maintain harvestable populations of goats. Native and introduced mountain goat populations should managed differently based on their differing population dynamics. Introduced populations typically have an irruptive growth pattern and high twinning rates, leading to high recruitment and population growth following introduction. Native mountain goat populations can endure less hunting pressure than an introduced population. New TCAs were created to cover all of Unit 1A where mountain goats reside (Figure 44-2) and now there are 43 TCAs which receive varied levels of monitoring. Harvest caps are set based on minimum counts corrected for sightability. Sightability correction yields an estimated count that considers both the animals seen in a survey and those that are likely present but not seen. The estimate is derived from a model that estimates how many goats are not being seen and incorporates them into a final count. To avoid overharvest, harvest of native or introduced populations does not occur below 50 adult goats. Additionally, harvest guideline levels are scaled with each population (Table 44-1). Female harvest is allowed on a sliding scale to reduce impact to the population.

RG001 harvest is highest in August and decreases rapidly with the progression of the season (Figure 44-3). Weather conditions are more favorable at the beginning of the season which encourages hunters to harvest early before heavy rain, fog, and snow increase towards the end of the season. December represents only 9% of the harvest from 2012–2021 likely because only a few late season goat hunters find goats lower in elevation as snow accumulates at higher elevations (Figure 44-3).

Late season harvest is not recommended for mountain goats since winter is the most nutritionally and physically stressful time of year. It is recommended that goats are not disturbed on important winter grounds from November 1–April 30 (Figure 44-4), although several regional goat seasons extend into November and December and have not resulted in unsustainable goat populations. After the first snow occurs, goats move down in elevation to maintain access to forage and are more vulnerable to harvest. Unit 8 is the only unit that has both a two-goat bag limit and a long winter season (goats in Unit 8 have a negative C&T finding). However, Kodiak's lack of goat predation allowed introduced populations to erupt, leading to high levels of harvestable surplus that managers compensate for with high bag limits and longer seasons.

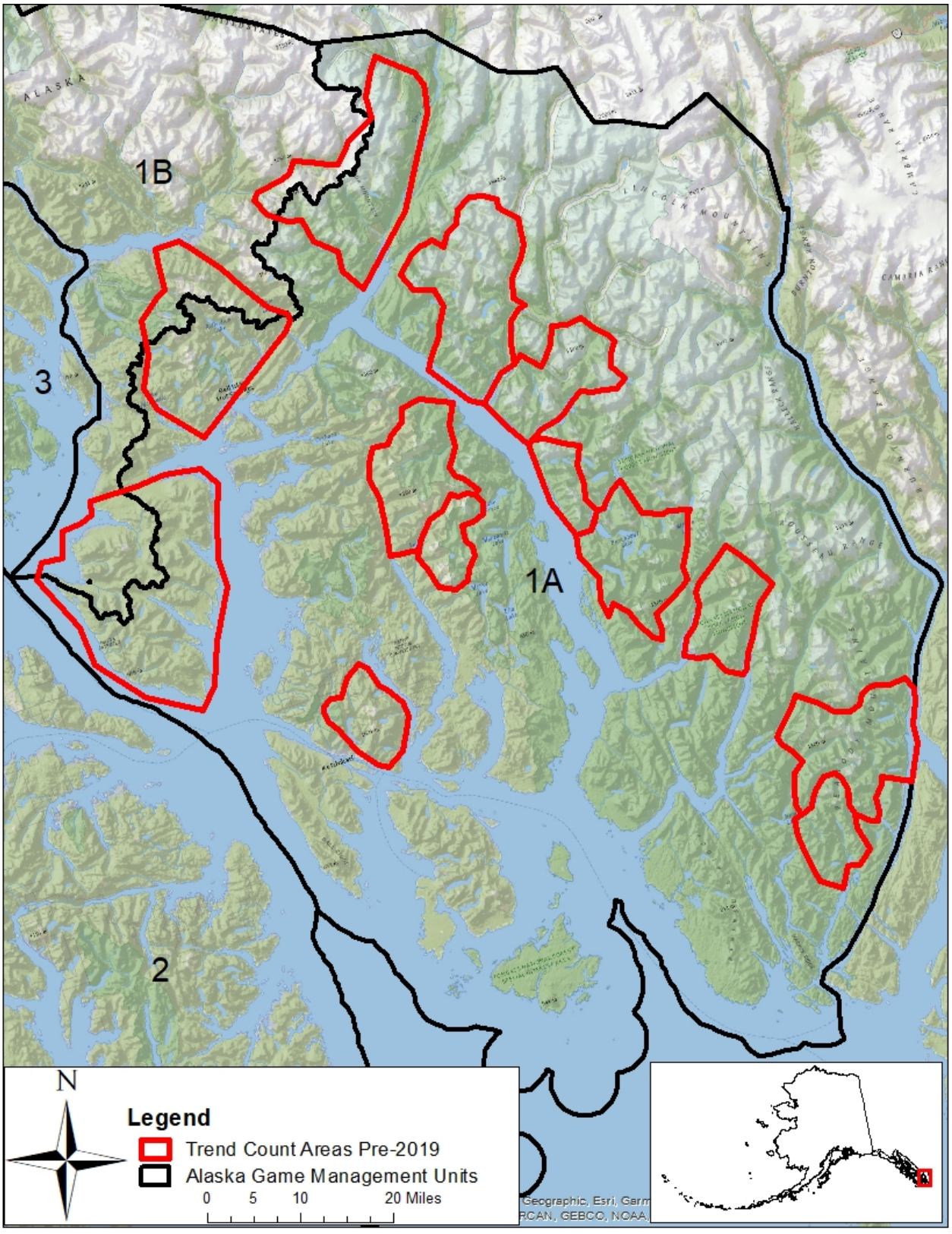

Figure 44-1. Map of Unit 1A historical (“old”) trend count areas for mountain goats, Southeast Alaska.

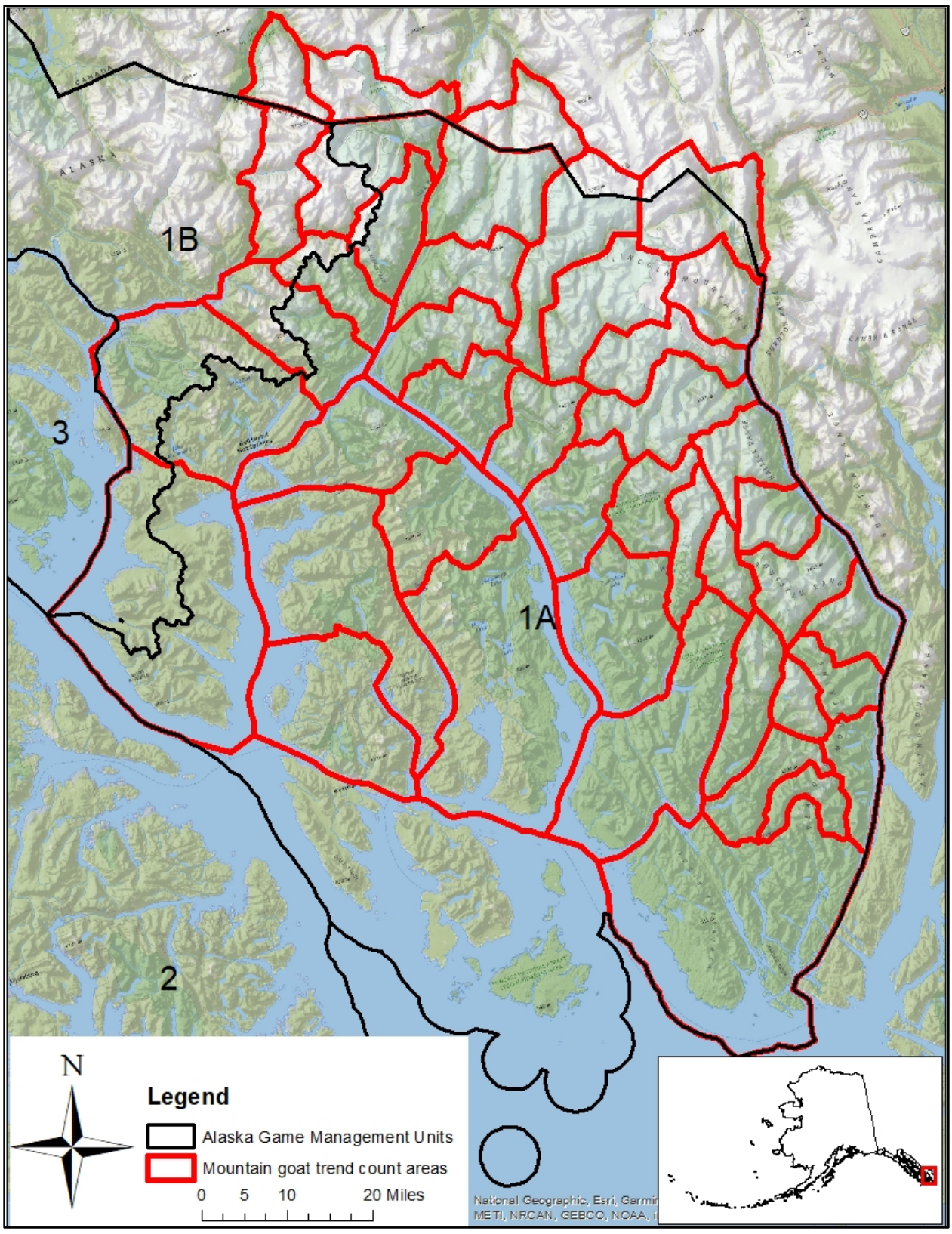

Figure 44-2. Current mountain goat trend count areas, Unit 1A, Southeast Alaska.

Table 43-1. Mountain goat harvest management strategy for Unit 1A, Southeast Alaska.

Population size	Maximum desired harvest rate (%)		Maximum desired female harvest (%)
	Native	Introduced	
<50 adults	0	0	0
≥50 adults to <100	2	3	≤25
≥100 to <200	3	5	25–30
≥200	4	7	≤30

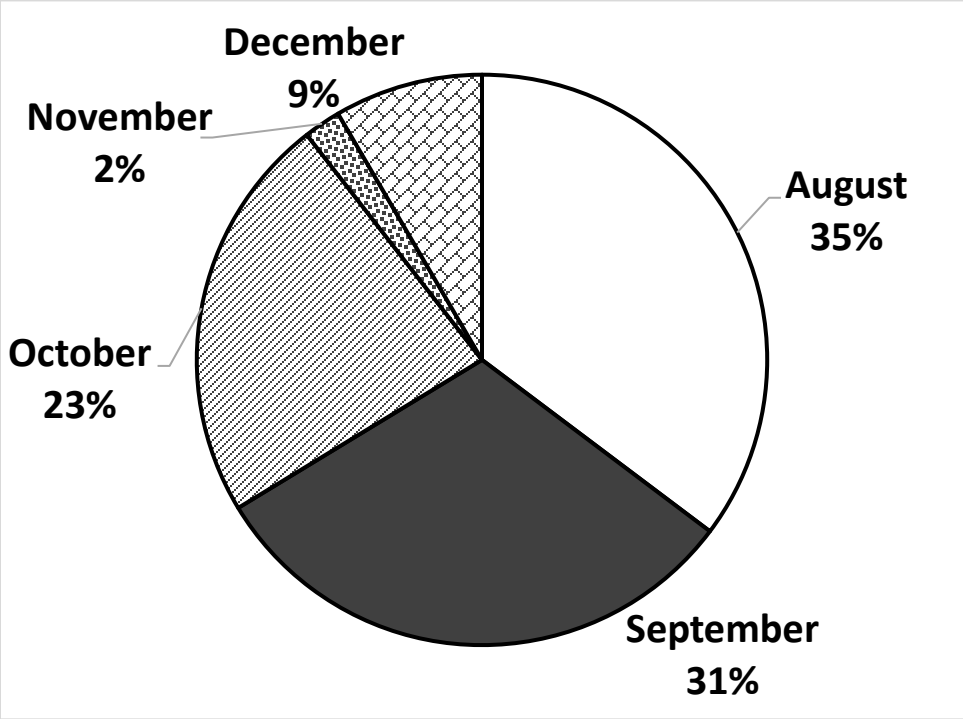

Figure 44-3. Goats harvested by month from 2012–2021 in RG001.

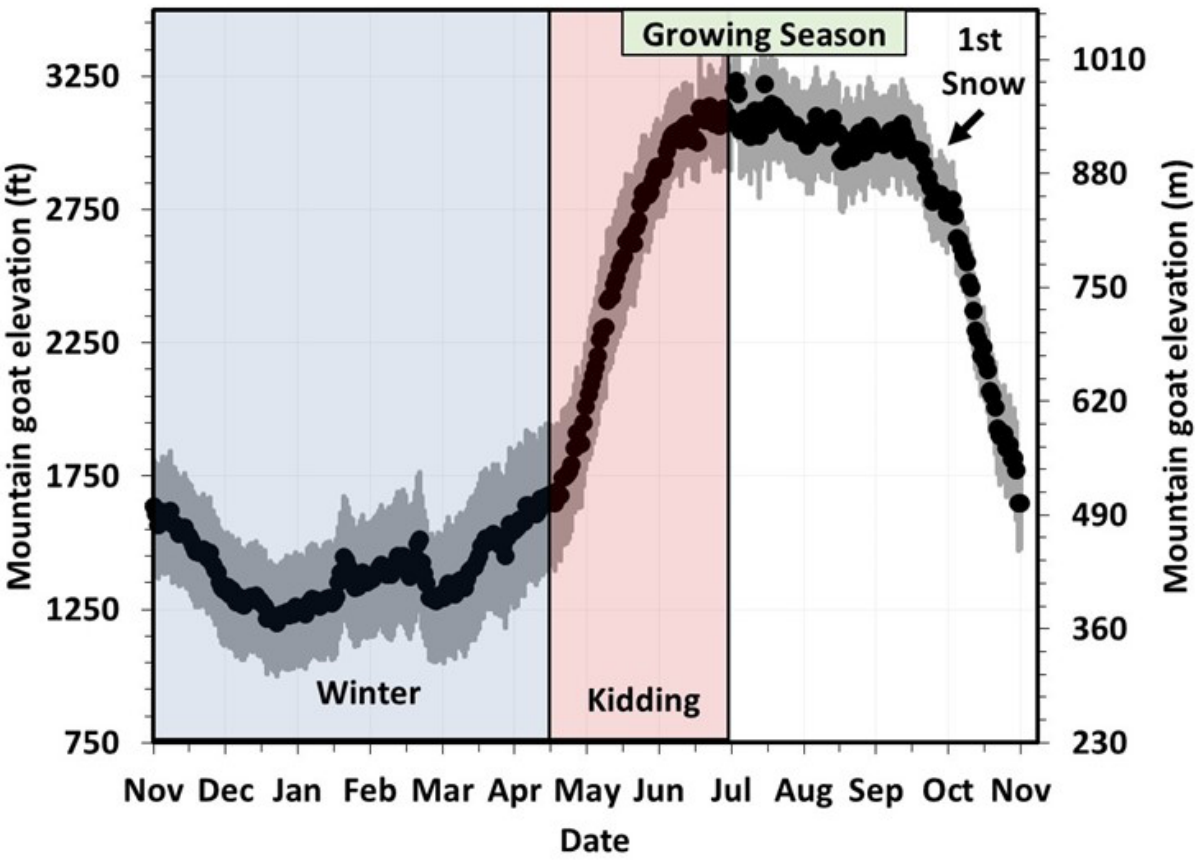

Figure 44-4. Elevational migration patterns of GPS collared mountain goats from coastal Alaska (n=172), 2005–2019.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it may cause localized conservation concerns. The current goat season is 5 months long and extends into December. Extending the season until the end of January would likely not increase harvest significantly; however, the indirect effects could lead to reduced survival of kids and older goats, decreased birth rates, and less goat opportunity in areas that are frequently hunted in late season. Currently, state and federal season length regulations are aligned, and this proposal would cause them to misalign.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

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PROPOSAL 45 – 5 AAC. 92.008, 85.056, 84.270. Harvest guideline levels, Hunting seasons and bag limits for wolf, Furbearer trapping.

PROPOSED BY: Alaska Wildlife Alliance

WHAT WOULD THE PROPOSAL DO? Raise the population objective for Game Management Unit 2 (Unit 2) wolves to 250–350 wolves and close the season if the population falls below 200 wolves.

WHAT ARE THE CURRENT REGULATIONS? The annual harvest of wolves in Unit 2 should be managed to maintain the unitwide population within a range of 150–200 wolves.

Hunting: Unit 2 wolves, resident and nonresident, bag limit: 5 wolves, open season: Dec. 1–Mar. 31.

Trapping: Unit 2 wolves, no bag limit, open season: Nov. 15–Mar. 31.

There is a positive C&T finding for wolves in Unit 2 and an ANS of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The objective range for the wolf population would increase from 150-200 to 250-350 wolves, and wolf harvest in Unit 2 would be closed if the population estimate fell below 200 wolves. A higher population objective may result in loss of trapping opportunity to ensure enough wolves to meet the objective.

BACKGROUND: Following a 2-year planning process involving diverse stakeholders, in 2019 the board adopted department proposals to implement a new harvest management strategy for wolves in Unit 2. That new strategy is based on the department varying annual harvest opportunity to maintain the Unit 2 wolf population within a board-established fall population objective range confirmed by annual population estimates.

Because the department planned to monitor wolf abundance through annual population estimates, it recommended that the board reference recent Unit 2 wolf management history and population estimates from 2013-2017 when establishing a sustainable population objective. Following low estimates in 2014 (n=89) and 2015 (n=108) and conservative harvest management, the population was estimated at 231 wolves in 2016 and 225 wolves in 2017. The 2018 estimate was not available for the January 2019 Board meeting. Based on the apparent resilience of the Unit 2 population as documented by department estimates, and public concern about the effects of wolf predation on deer, the board set the fall population objective at 150-200 wolves.

Since the 2019 board meeting, department research has made two key findings relative to that population objective. First, evidence suggests the population estimates on which the current population objectives were based were biased low. A preliminary analysis indicates that when estimates are based on fewer samples, as they were in 2014 and 2015, and to a lesser degree in 2016 and 2017, the tendency is for those estimates to be biased low. If those estimates were biased

low, the population objective based on those estimates was also biased low and should be revised. Another effect of a low bias estimate is that harvest management has been conservative. The department is investigating factors that could bias population estimates and the degree to which more recent estimates may be biased.

Second, a department-sponsored graduate student working found that wolves in Unit 2 are largely reproductively isolated from wolves in neighboring units and that wolves in the Unit 2 breeding population are closely related to each other. The department now has a much larger dataset and will conduct a more definitive analysis.

The department agrees that the current population objective should be reviewed. In recognition of the potential importance of the above findings, since 2020 the department has managed harvest with the goals of offering meaningful hunting and trapping opportunity while maintaining the wolf population above the current objective range.

To help the board evaluate the proposed population objective (250-350) and minimum population to allow harvest (200) the department reviewed how the proposed objective would have affected harvest management from 2016-2021. It is important to remember that harvest management is based on the previous fall's estimated population (Figure 45-1). For this exercise, estimated trapping opportunity is based on harvest rates of 15-21 wolves/week as documented during the 2019-2021 seasons and maintaining a post-harvest population of at least 200 wolves. Using the department's actual estimates and the proposed population objective would have allowed no harvest in fall 2016, one week of trapping opportunity in 2017 and 2018, no harvest in 2019, up to 5-7 weeks of trapping opportunity in 2020, and up to 9-12 weeks of trapping opportunity in 2021.

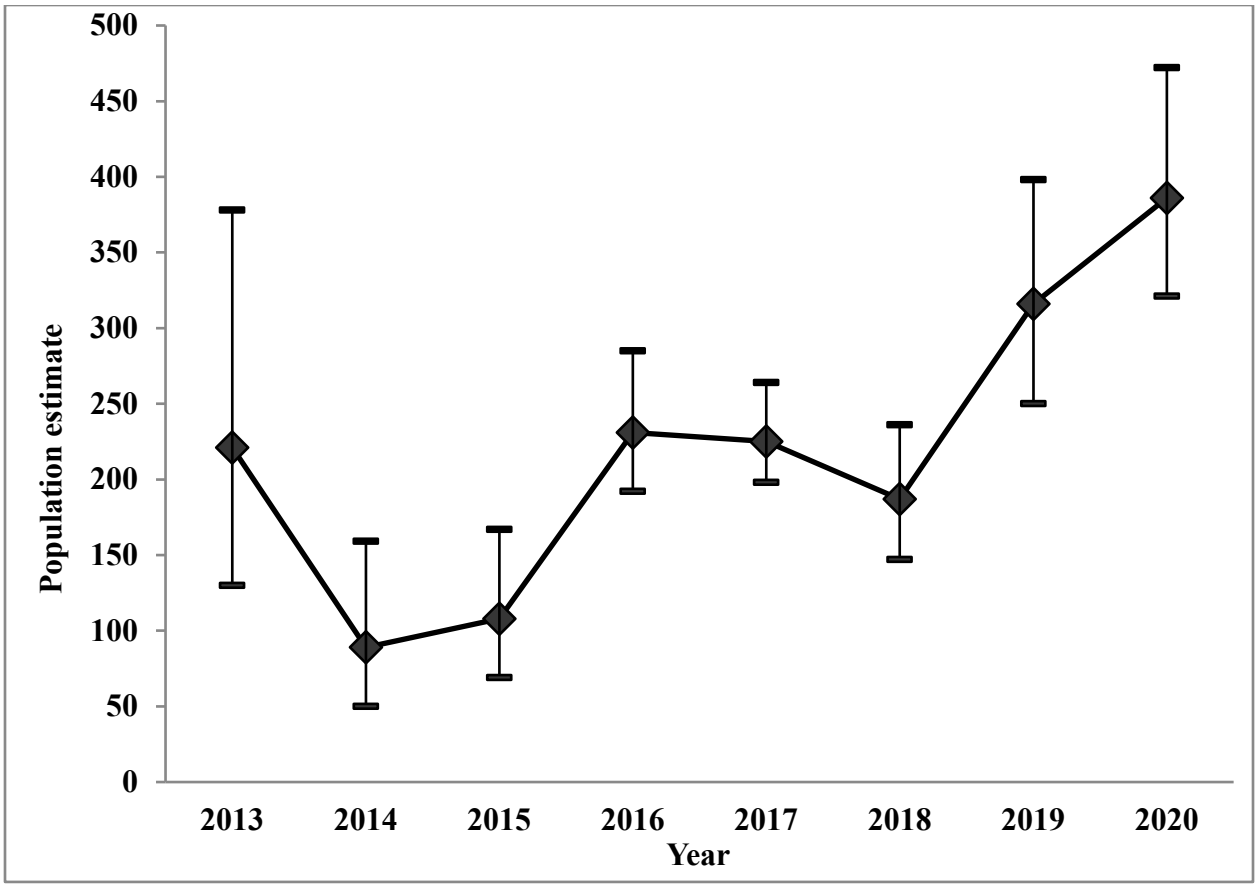

Figure 45-1. Plot of fall wolf population estimates during 2013–2020 for Unit 2. Diamonds represent the point estimates used for managing harvest, lines represent the 95% confidence intervals.

In lieu of recommending a numerical range for a revised population objective, the department suggests that the range should: 1) be for the fall (post reproduction) population, 2) ensure a sustainable and harvestable wolf population, 3) consider the precision with which the department can monitor Unit 2 wolf abundance, and 4) balance the need for a sustainable wolf population with minimizing the effect of wolf predation on deer. Without completing additional analyses, the department's opinion is that the proposed population objective is likely to ensure a sustainable wolf population and unlikely to increase deer abundance.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the proposed population objective of 250-350 wolves but **OPPOSES** the minimum population threshold of 200 wolves to allow wolf harvest. The department agrees that the Unit 2 wolf population objective should be reviewed but has not yet performed the analyses needed to recommend a new objective range. The proposed lower threshold for harvest of 200 wolves is higher than necessary. Evidence suggests the department's population estimates are more likely to be biased low than high, indicating that harvest management is already conservative. Using the proposed threshold could unnecessarily reduce wolf harvest opportunity and may impact deer abundance and hunting opportunity.

COST ANALYSIS: Adopting this proposal is unlikely to result in additional costs to the department.

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PROPOSAL 46 – 5 AAC 85.056. Hunting season and bag limits for wolf.

PROPOSED BY: Ketchikan Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? Change the starting date for wolf hunting in Unit 2 from December 1 to September 1 to align with the federal subsistence hunting start date.

WHAT ARE THE CURRENT REGULATIONS?

State of Alaska hunting
In Unit 2: Open Season Dec. 1 – Mar. 31, five wolves

All wolves taken in Unit 2 must be sequentially numbered or marked by the hunter, the hunter must call the ADF&G Ketchikan office at (907) 225-2475 within 7 days of take to report the date and location of take, and all hides must be sealed within 15 days of take.

Federal Subsistence hunting regulations
In Unit 2: Open Season Sep. 1 – Mar. 31, no bag limit

All wolves taken in Unit 2 must be sequentially numbered or marked by the hunter and all hides must be sealed within 15 days of take.

There is a positive C&T finding for wolves in Unit 2 and an ANS of 90% of the harvestable potion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would provide an additional 3 months of wolf hunting opportunity, and would align the state hunting season for wolves in Unit 2 with the federal season. Few wolves are taken by hunting and an extended season is unlikely to result in a significant increase in harvest.

BACKGROUND: Most people who harvest wolves in Unit 2 are local residents eligible to take wolves under state and federal regulations. State and federal trapping seasons open on November 15. Over the last decade an average of fewer than 3 wolves per year, or about 5% of total wolf harvest, have been taken under federal hunting regulations during September or October (Figure 46-1).

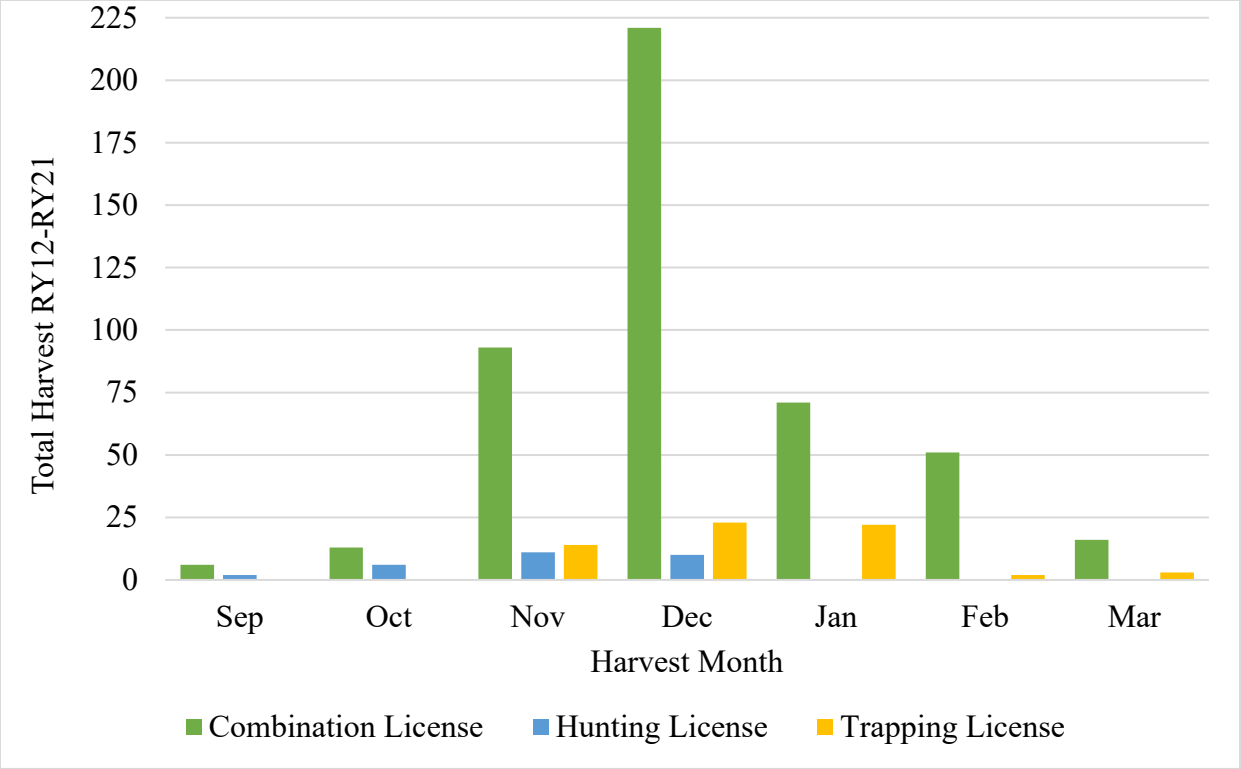

Figure 46-1. Total wolf harvest by month and license type during RY12-RY21, Unit 2, Southeast Alaska.

About 80% of land in Unit 2 is federally managed. Opening the state hunting season for wolves on September 1 would expand harvest opportunity for all hunters on all lands, and, for federally qualified hunters, on the roughly 20% of Unit 2 that is not federally managed public lands. In the last decade nearly 90% of wolves taken in Unit 2 were taken by local residents who are federally qualified.

In 2019 the department implemented a new Unit 2 wolf harvest management strategy. That strategy assumes most wolves will be taken under trapping regulations and primarily manages harvest by varying trapping opportunity.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because the proposed change is unlikely to significantly increase harvest, result in a conservation concern, or affect the current harvest management strategy, and in general the department supports additional opportunity when populations allow for it. The department anticipates the primary beneficiaries of expanded wolf hunting opportunity would be non-federally qualified residents of Ketchikan hunting deer and guided and unguided nonresidents hunting deer and black bears in Unit 2. It is likely those hunters will only take wolves opportunistically and that the proposed change will have little effect on total harvest or the proportion of wolves taken by hunting versus trapping.

COST ANALYSIS: Adopting this proposal would not result in additional costs for the department.

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PROPOSAL 47 – 5 AAC 92.170. Sealing of marten, fisher, lynx, beaver, otter, wolf, and wolverine.

PROPOSED BY: Alaska Wildlife Alliance

WHAT WOULD THE PROPOSAL DO? This proposal would require wolf harvest in Game Management Unit 2 (Unit 2) to be reported as follows:

Wolves taken during either the hunting season or during the trapping season must be reported by phone to ADF&G within 48 hours and sealed within 14 days of harvest.

Require hunters and trappers who take wolves in Unit 2 to call in harvest information to a recorded department voice mail box within 48 hours of recovery. As wolves are taken and reported, they should be numbered sequentially to assist the department in censoring the wolf from the mark recapture study. Very general location data should also be provided in the call-in. The current 15-day sealing period requirement would be reduced by one day. An area office, or a wolf sealing station, on Prince of Wales Island would make reporting and sealing requirements easy for the public and provide other useful information.

WHAT ARE THE CURRENT REGULATIONS? All wolves taken in Unit 2 must be sequentially numbered or marked by the hunter, the hunter must call the ADF&G Ketchikan office at (907) 225-2475 within 7 days of take to report the date and location of take, and all hides must be sealed within 15 days of take.

There is a positive C&T finding for wolves in Unit 2 and an ANS of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Hunters and trappers who take wolves in Unit 2 would have to call into the department within 48 hours of take instead of the current requirement to call in within 7 days of take. Sealing time would be reduced from 15 days to 14 days, giving hunters and trappers one less day to seal wolves from Unit 2.

Adopting this proposal would result in little change. The only substantial change would be reducing the period during which hunters and trappers are required to report wolf harvest to ADF&G by phone from 7 days to 2 days. Also, most people who harvest wolves in Unit 2 are federally qualified subsistence users, and those individuals would have the option of reporting harvest of wolves taken on federal lands (nearly 80% of Unit 2) under federal regulations, which have no call-in requirement.

BACKGROUND: In March 2021, the department submitted Proposal 194, which requested that the sealing period for wolves in Unit 2 be reduced from within 30 days of the end of the season to within 7 days of take. The justification was that the department determined that a shorter sealing period provided better information for annual population estimates. The board determined that sealing wolves within 7 days of take would be burdensome to trappers and instead determined that

numbering or marking wolves with unique ID numbers, calling the department within 7 days of take, and sealing within 15 days of take was sufficient to meet the department's needs.

To align state and federal wolf sealing requirements in Unit 2, the department submitted Proposal WP22-03 to the April 2022 Federal Subsistence Board (FSB) meeting with the same language for sealing requirements that the board created during their 2021 meeting. The FSB determined the call-in portion of the regulation was burdensome to wolf harvesters but adopted the remainder of the proposal. Federal regulations now require hunters and trappers to sequentially number or mark hides and seal their wolves within 15 days of take, but do not require them to report harvest by phone.

The department's current harvest management strategy is based on annual population estimates and offering harvest opportunity sufficient to maintain the population within an objective range established by the board. A shorter reporting period in state regulation could allow the department to more precisely monitor harvest during the trapping season. However, a shorter reporting period is not required for the department to sustainably manage GMU 2 wolves. It should also be noted that many hunters and trappers voluntarily provide tissue samples and foreleg bones at the time of sealing to aid in the department's efforts to accurately estimate the wolf population and monitor age class of harvested wolves. Finally, seven designated sealers in three communities on Prince of Wales Island provide local opportunity to seal wolves.

DEPARTMENT COMMENTS: The department **SUPPORTS** proposal because a shorter reporting period would allow the department to more precisely monitor harvest during the season.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional cost to the department.

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PROPOSAL 48 – 5 AAC. 92.008, 85.056, 84.270. Harvest guideline levels, Hunting seasons and bag limits for wolf, Furbearer trapping.

PROPOSED BY: Alaska Wildlife Alliance

WHAT WOULD THE PROPOSAL DO? Require the department to conduct a population viability analysis (PVA) for wolves in Game Management Unit 2 (Unit 2) and to use the outcome of that analysis as the minimum value for the population objective range. The proposal further recommends a PVA be conducted by a contractor.

WHAT ARE THE CURRENT REGULATIONS? The annual harvest of wolves in Unit 2 should be managed to maintain the unit-wide population within a range of 150–200 wolves.

Hunting: Unit 2 wolves, resident and nonresident, bag limit: 5 wolves, open season: Dec. 1–Mar. 31.

Trapping: Unit 2 wolves, no bag limit, open season: Nov. 15–Mar. 31.

There is a positive C&T finding for wolves in Unit 2 and an ANS of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The population objective range for Unit 2 wolves may change depending on the outcome of a PVA.

BACKGROUND: The department is constitutionally mandated to manage all harvested populations on the sustained yield basis. At the department's request, in 2019 the board adopted regulations that changed the harvest management strategy for Unit 2 wolves from a quota system based on a fixed Guideline Harvest Level (GHL) in regulation to one based on maintaining the population within an objective range confirmed by annual population estimates.

The appropriate size for the Unit 2 wolf population has been controversial for decades. High wolf numbers result in increased predation on deer. Low wolf numbers could result in a conservation concern for the population. The HGL only provided the department with guidance on the proportion of the population to harvest, not a population size to maintain. The department recognized that maintaining the population above a certain size was key to sustainability, and for that reason asked the board to establish a population objective on which the department could base management. The 2019 management strategy was developed over a two-year period through extensive engagement of stakeholders, and the proposals to implement that strategy were promulgated through the board process, which provides extensive opportunity for public participation.

Because the department planned to monitor wolf abundance through annual population estimates, it recommended that the board reference the recent Unit 2 wolf management history and population estimates from 2013-2017 when setting a sustainable population objective. Following low estimates in 2014 (n=89) and 2015 (n=108) and conservative harvest management, the population was estimated at 231 wolves in 2016 and 225 wolves in 2017. Based on the apparent resilience of the Unit 2 population as documented by department estimates, the board set the existing fall population objective at 150-200 wolves.

Since the 2019 board meeting, department research has made two key findings relative to that population objective. First, evidence suggests the population estimates on which the current population objectives are based have been biased low, particularly since they were based on fewer samples, as they were in 2014 and 2015. If estimates were biased low, the population objective based on those estimates was also biased low. Second, a department-sponsored graduate student found that wolves in Unit 2 are largely reproductively isolated from wolves in neighboring units and that wolves in the Unit 2 breeding population are closely related to each other.

Breeding among closely-related individuals can lead to a condition called inbreeding depression

where unfavorable genetic traits are more likely to be expressed because there is a greater chance that both parents carry the unfavorable trait. No signs have been found of inbreeding depression in Unit 2 wolves. Maintaining a larger effective breeding population can reduce the likelihood of inbreeding depression.

The department is engaged in research to learn more about the genetic composition of the Unit 2 wolf population, connectivity with other wolf populations, and its vulnerability to inbreeding depression. Until more is known, the department will balance harvest opportunity with the need to conserve existing genetic diversity.

This proposal suggests using a PVA to set the lower limit of a Unit 2 wolf population objective. PVAs are a modeling tool used to identify information needs and for evaluating management scenarios. Like all modeling exercises, the outcome of a PVA is heavily reliant on the quality of available information, validity of the assumptions made, and model design. Therefore, a PVA is not an objective process, and choices over which data and assumptions to include can bias the outcome. Because PVAs are so reliant on the choices of data and assumptions, a PVA should not be the only source of information used when setting a population objective for Unit 2 wolves.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. Conducting a PVA is a reasonable idea for exploring information needs and ideas about what influences the Unit 2 wolf population, but a PVA should not be the only tool used when setting a population objective. Department staff are best positioned and fully capable to conduct an informed PVA and likely will engage in that process over the next few years. Requiring the department to conduct a study, or to use a contractor is outside the board's authority.

COST ANALYSIS: Adoption of this proposal may result in additional costs to the department if a study is done.

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PROPOSAL 49 – 5 AAC. 92.008, 85.056, 84.270. Harvest guideline levels, Hunting seasons and bag limits for wolf, Furbearer trapping.

PROPOSED BY: Alaska Wildlife Alliance

WHAT WOULD THE PROPOSAL DO? This would base the harvest season length for wolves in Game Management Unit 2 (Unit 2) on the lower confidence interval value of ADF&G's annual population estimate, rather than on the point estimate.

WHAT ARE THE CURRENT REGULATIONS? The annual harvest of wolves in Unit 2 should be managed to maintain the unit wide population within a range of 150-200 wolves.

Hunting: Unit 2 wolves, resident and nonresident, bag limit: 5 wolves, open season: Dec. 1–Mar. 31.

Trapping: Unit 2 wolves, no bag limit, open season: Nov. 15–Mar. 31.

There is a positive C&T finding for wolves in Unit 2 and an ANS of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Currently the department uses the point estimate from annual population estimates to set harvest season length and to gauge whether the Unit 2 wolf population is being maintained within the board-established fall population objective range. Rather than basing harvest management on the central point estimate, this proposal asks that harvest management be based on the lower confidence limit for each year's estimate. The department presents each point estimate within a 95% confidence interval. Using the lower confidence interval for management would reduce harvest opportunity and result in greater certainty that the population objective is met or exceeded because the harvest will be curtailed to the lowest numbers of wolves estimated to be in the population.

BACKGROUND: In response to challenges managing harvest under a quota system, a need for board guidance on measurable goals for the population, and complaints from trappers about unpredictable season length and season closures with little prior notice, from 2017-2019 the department worked with stakeholders to develop a new Unit 2 wolf harvest management strategy. In 2019 the board adopted regulatory changes to implement that strategy, which varies harvest opportunity relative to annual population estimates to maintain the Unit 2 wolf population within a board-established fall population objective range of 150-200 wolves.

Annual measures of abundance are key to managing wolves under this strategy. In Unit 2 wolves cannot be counted due to dense forest cover, so the department estimates wolf abundance by collecting DNA from individual wolves using an extensive array of scented hair board nodes (node = 5 hair boards) distributed within sampling cells throughout northern and central Prince of Wales Island. The U. S. Forest Service and a citizen science program have helped with sample collection, and, since 2016 the Hydaburg Cooperative Association has operated a second array of hair boards to the south of the department's array using the department's protocol. Sampling occurs from October-December to minimize interference by black bears and to complete the work before snow complicates access and covers hair boards. Hair boards are checked and re-scented weekly. Wolves roll on the scented boards leaving hair on barbed wire. DNA extracted from hair follicles is used to identify individual wolves, as well as to provide the date and location where each individual was detected.

Those detections, along with samples collected at sealing from trapper-caught wolves, are used to estimate the density of wolves within the area sampled by the hair board array. That area is determined by movements of individual wolves detected throughout the array. Wolf density estimated for this area of analysis (~60% of Unit 2), expressed as wolves/1,000 km^2, is then applied to the remainder of Unit 2 to estimate the total number of wolves in the unit. The department presents estimated density and estimated population size as specific values within a calculated

range of plausible values, which is known as a confidence interval.

Estimates are not counts, so each estimate is almost certainly higher or lower than the true population size. The true population size is unknown, but it is almost certainly within the range of the confidence interval around each estimate. Confidence intervals associated with estimates have been relatively precise (Figure 49-1) and are adequate for sustainable management. The department bases harvest management on each year's point estimate because management needs to be based on a specific value and the point estimate is the value most likely to be correct given the data collected that year.

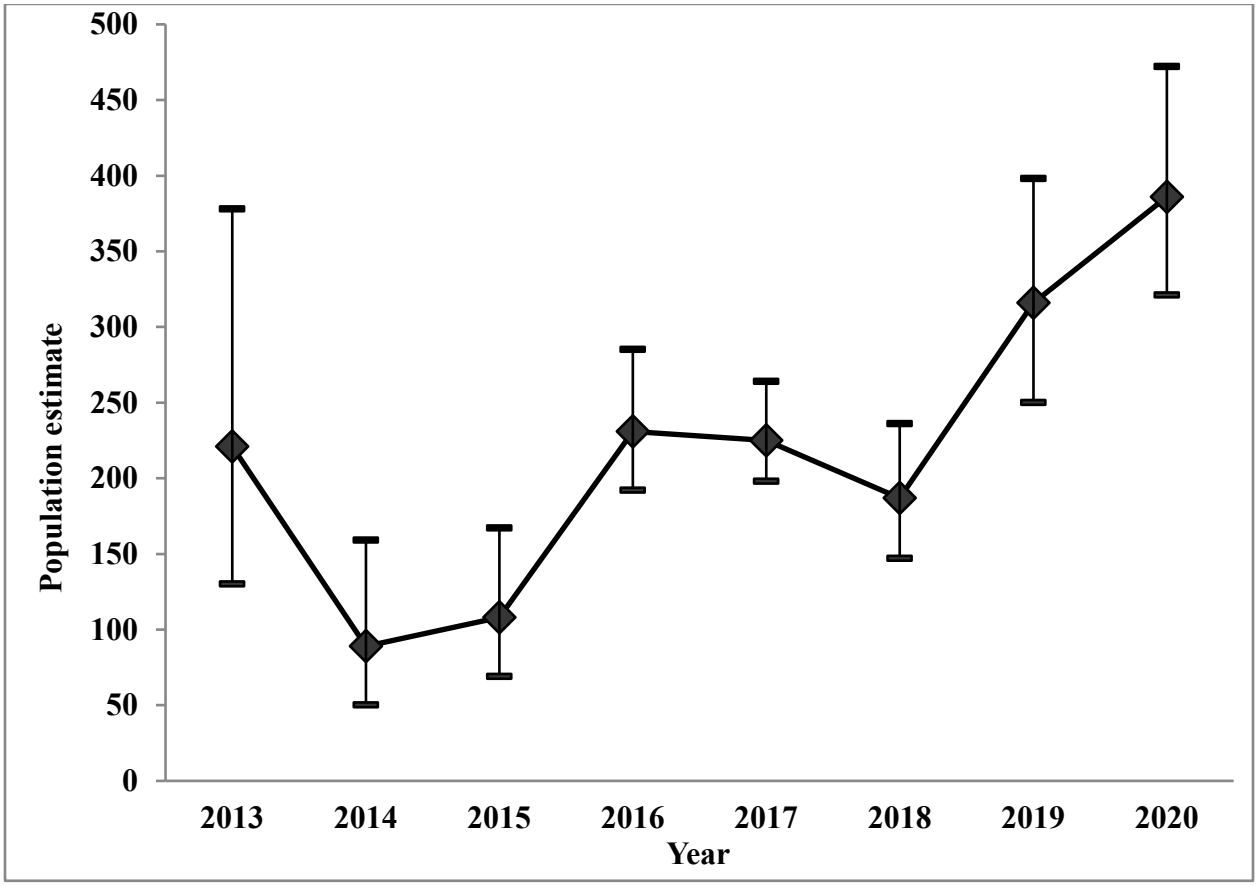

Figure 49-1. Plot of fall wolf population estimates during 2013–2020 for Unit 2. Diamonds represent the point estimates used for managing harvest, lines represent the 95% confidence intervals.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it will unnecessarily limit harvest opportunity. Recent analyses indicate the department's population estimates have almost certainly been biased low, so harvest management based on those estimates is already conservative. Basing management on an even more conservative value like the lower confidence limit for each estimate is unnecessary for sustainable management.

COST ANALYSIS: Adopting this proposal is unlikely to result in additional costs to the department.

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PROPOSAL 50 – 5 AAC. 92.008, 85.056, 84.270. Harvest guideline levels, Hunting seasons and bag limits for wolf, Furbearer trapping.

PROPOSED BY: Alaska Wildlife Alliance

WHAT WOULD THE PROPOSAL DO? The preseason population estimate of wolves in Game Management Unit 2 (Unit 2) would be based on the estimated population of wolves on Prince of Wales Island alone, with no extrapolation of the population estimate for the outer islands in Unit 2.

WHAT ARE THE CURRENT REGULATIONS? The annual harvest of wolves in Unit 2 should be managed to maintain the unit-wide population within a range of 150–200 wolves.

Hunting: Unit 2 wolves, resident and nonresident, bag limit: 5 wolves, open season: Dec. 1–Mar. 31.

Trapping: Unit 2 wolves, no bag limit, open season: Nov. 15–Mar. 31.

There is a positive C&T finding for wolves in Unit 2 and an ANS of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The population estimate used to determine the Unit 2 wolf season length would be determined by an estimate produced for only Prince of Wales Island (POW) and would not include wolves inhabiting the numerous islands to the west of POW in Unit 2. This would result in harvest opportunity offered each year being based on a smaller population and result in less hunting and trapping opportunity.

BACKGROUND: In 2019 the department implemented a new Unit 2 wolf harvest management strategy based on annual unit-wide population estimates and managing harvest to maintain the population with a board-established unit-wide fall population objective. Each year since 2013 the department has estimated the Unit 2 wolf population using a DNA-based spatially-explicit capture-recapture method in which wolf DNA is non-invasively captured when wolves roll on an array of scented hair boards distributed throughout northern and central POW.

Sampling occurs during fall (October – December) to minimize the likelihood that black bears will interfere with the hair boards and because the boards are less effective when covered by snow and ice. Hair boards must be checked for hair and re-scented once per week, so DNA in hair follicles does not degrade. Due to the challenging logistics of accessing the western islands during short

daylight hours and rough fall weather, only a few hair board nodes have been located on the western islands.

Over the years the U.S. Forest Service, The Nature Conservancy, and a citizen science project have cooperated with the department to operate hair boards on POW, and since 2016 the Hydaburg Cooperative Association has also cooperatively operated an array of hair boards to the south of ADF&G's array. Movements of individual wolves detected throughout the hair board array are used to estimate the area effectively sampled by the hair boards. Collectively, the hair board arrays effectively sample about 80% of the land area of Unit 2, including portions of the western islands (Area of Analysis in Figure 50-1). The validity of including portions of the western islands within the effective sampling area is supported by ADF&G radiocollar data showing wolves swim among the islands and by wolves detected at hair boards on POW being subsequently harvested by trappers on the western islands. DNA collected from each wolf sealed by trappers, including wolves taken on the western islands, contributes to the unit-wide population estimate.

The proposal contends that few wolves occupy the western islands; however, substantial evidence indicates that is incorrect. Since 2013 wolves have occupied Pleasant Island (70 km^2) which is about 1 km from the Unit 1C mainland near Gustavus, and the department has monitored their abundance using game cameras and radiocollared individuals. Those wolves quickly depleted the deer population and since about 2016 have relied on sea otters as their primary prey. Despite the lack of ungulate prey, no radiocollared wolf has left the island. Further, genotyping DNA extracted from 390 scats collected over several years identified 19 individual wolves from Pleasant Island and 42 individual wolves from the adjacent mainland. No individual wolves were detected in both areas.

ADF&G documented successful reproduction on Pleasant Island from 2018-2021, and successful reproduction in prior years is almost certain. The greatest number of wolves observed on Pleasant Island was 13 in 2017. Based on minimum counts, since 2013 the pack has maintained an average size of 6.7 wolves, which is a density of 124 wolves/1,000 km^2. For reference, the greatest density of wolves documented within ADF&G's Unit 2 study area is 44 wolves/1,000 km^2 in fall 2020. Similar to Pleasant Island, wolves living on smaller islands within Unit 2 also have access to alternate prey, including marine mammals (sea otters, harbor seals), beavers, and black bears. Trappers also report taking multiple wolves on relatively small islands within Unit 2. In 2019 one trapper reported taking 12 wolves on an island with an area of only 26 km^2 that is about 2 km from other islands including POW.

The available evidence indicates that wolf populations on the smaller islands can reach very high densities, and there is no reason to think that is not also the case for the islands of Unit 2 west of POW. Wolf populations on individual islands may be ephemeral, but the collective density of wolves on those islands, which make up 40% of Unit 2, is likely to be at least as high as the density that the department estimates within its study area. Evidence also indicates that Unit 2 is a single population of wolves because wolves move among the outer islands and POW. Therefore, it is

appropriate to apply the estimated density of wolves from ADF&G's study area to the remainder of Unit 2 and to manage Unit 2 as a single population of wolves.

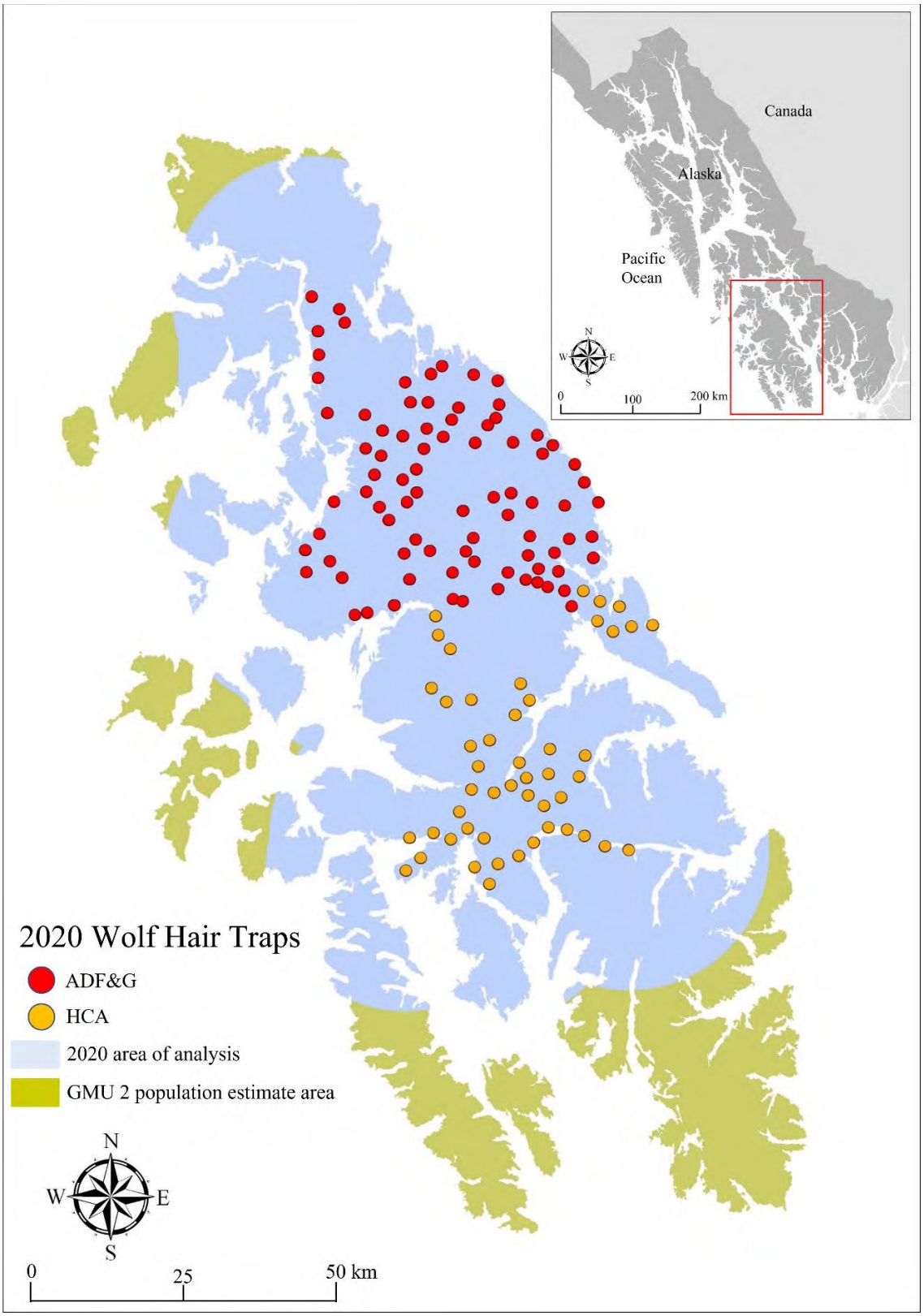

Figure 50-1. The wolf population area of analysis (6,843 km^2) and hair trap stations used during fall 2020 in Unit 2.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it unnecessarily reduces hunting and trapping opportunity. The proposal makes the unsupported assumption that few wolves inhabit smaller islands to the west of POW. Evidence from Southeast Alaska and elsewhere indicates that even after ungulate prey is depleted, wolves can exploit alternate prey and maintain high densities on smaller islands for extended periods.

COST ANALYSIS: Adopting this proposal is unlikely to result in additional costs to the department.

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PROPOSAL 51 – 5 AAC. 92.008, 85.056, 84.270. Harvest guideline levels, Hunting seasons and bag limits for wolf, Furbearer trapping.

PROPOSED BY: Alaska Wildlife Alliance

WHAT WOULD THE PROPOSAL DO? This proposal would change harvest management for Unit 2 wolves from the current strategy to maintain the population within a board-established population objective range by annually varying harvest opportunity relative to annual population estimates to a harvest quota-based system where the department would annually establish a harvest quota based on a fixed percentage established by the board. The proposal also asks the board to establish a minimum 3-day public notice period prior to the department issuing an emergency order closing the Unit 2 wolf harvest seasons and that trappers be allowed up to 3 additional days to close traps after an EO is issued in case of adverse weather conditions. The proposal does not define adverse weather. The proposal also mentions accounting for all forms of mortality, managing for a population objective, and in-season harvest monitoring, but proposes no specific regulatory changes for those topics.

WHAT ARE THE CURRENT REGULATIONS? The annual harvest of wolves in Unit 2 should be managed to maintain the unit-wide population within a range of 150–200 wolves.

Hunting: Unit 2 wolves, resident and nonresident, bag limit: 5 wolves, open season: Dec. 1–Mar. 31.

Trapping: Unit 2 wolves, no bag limit, open season: Nov. 15–Mar. 31.

There is a positive C&T finding for wolves in Unit 2 and an ANS of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Unit 2 wolf harvest management would revert to a quota-based system. Instead of managing harvest by varying season length, the season would be closed by emergency order once harvest reached the quota. In the past the department found it difficult to close the season based on a quota. Often harvest has exceeded the quota before the department is aware it has; subsequently, overharvest is a concern

when managing trapping on a quota. Trappers may also have difficulty retrieving traps if the season closes on short notice.

BACKGROUND: (Unit 2 wolf management has undergone many changes through time to address management and conservation concerns.

- In 1997, the board changed the management strategy to a harvest guideline level (HGL) and shortened the hunting season from a 9-month season to 4 months and the trapping season from over 5 months to 4 months.
- From 1997–1999, the board established HGL was set at 25% of the most recent population estimate.
- From 2000–2013, the HGL increased to 30%.
- In 2011, the board shortened the state sealing period to 14 days.
- In 2013, the department collected data for the first population estimate using wolf genetics and spatially-explicit capture-recapture (SECR) methods.
- In 2014, the department first used the SECR population estimate with a HGL of 30% to set the harvest quota (Figure 51-1).
- From 2015–2018, the board reduced the HGL in regulation to 20%, but during 2015-2016 the department reduced the HGL by 50% due to low population estimates.
- From 2019–present, the department has used a population objective established by the board at their 2019 meeting. The board also removed the 14-day sealing requirement for wolves harvested in Unit 2 and the 30-day requirement was reinstated.
- In 2021, the BOG required that wolves taken in Unit 2 be sequentially numbered or marked, hunters and trappers report harvest to the department within 7 days of take, and the wolves be sealed within 15 days of take.

When developing the current Unit 2 wolf management strategy, the department had several goals, including ensuring sustainable harvest opportunity and management, providing managers with the necessary guidance from the board while allowing the flexibility needed to manage a dynamic wolf population, and providing the public with a consistent strategy that would not change every few years that also included clear goals for this high-profile wolf population. The current management strategy employs methods that are reliable, realistic to implement, and that offer predictable and sustainable harvest opportunity. It is important to recognize that since first implementing this strategy in 2019, the department has successfully used it to maintain the Unit 2 wolf population within or above the board-established fall population objective range.

Returning to a quota-based harvest management strategy would be a step backward. Basing a harvest quota on a fixed percentage in regulation limits the department's flexibility to alter management to maintain the population within an objective range. Quota-based systems also give a misleading impression of the precision with which harvest can be monitored. They rely on all trappers reporting as required by regulation and fail to recognize that there is no trap check

requirement and that trappers cannot predict how many wolves they will recover during each trap check. For these reasons, managing harvest to meet quotas is difficult, particularly when quotas are low.

The primary goal of this proposal appears to be placing a numerical cap on the number of Unit 2 wolves that can be harvested each year. However, any quota will be based on an estimate of the population size from the prior year. An estimate is just that, an estimate, not a count of the true population size, and an estimate from the previous fall does not account for changes in population size over the intervening months. The department always presents population estimates within a range of uncertainty (confidence interval) that is highly likely to include the true population size. The department uses the point estimate for management because that is the value most likely to be correct given the data collected that year.

Any management strategy should recognize the uncertainty associated with estimates. The department's current harvest management does that by offering a specific amount of harvest opportunity that will result in harvest that is likely to maintain the population within the objective range. There is no numerical cap on harvest, but harvest is effectively capped by length of the trapping season. Since 2019, the harvest rate has averaged 2.6 wolves harvested per day of trapping season (range 2.1-3.0). Therefore, in a 30-day trapping season about 80 wolves will be harvested, with a potential range of 63-90 wolves. That level of uncertainty over anticipated reported harvest is similar to managing under a quota. For reference, in 2016, 2017, and 2018 the harvest quotas were 11, 46, and 45, respectively, and reported harvest was 30, 62, and 46 wolves, respectively. The quota was met in one year, but substantially exceeded in the others.

In summary, the department's current Unit 2 wolf harvest management strategy has succeeded at maintaining the Unit 2 wolf population within or above the board-established population objective range for the last 3 years. Rather than closing the season with only 3-days' notice, as proposed here, trappers are informed of the season length before it opens. It also does not rely on universal compliance with very short reporting requirements or any additional changes to federal sealing regulations.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. The current management strategy was adopted in 2019 after a lengthy public process and was developed to address shortcomings in the previous quota-based management strategy. Since 2019 Unit 2 wolf population estimates confirm that the current management framework has met or exceeded the board-established fall population objective every year. The department's current harvest management strategy is workable and sustainable for trappers, managers, and wolves and the ecosystem they occupy.

COST ANALYSIS: Adoption of this proposal is not likely to result in additional costs to the department.

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PROPOSAL 52 – 5 AAC. 92.008, 85.056, 84.270. Harvest guideline levels, Hunting seasons and bag limits for wolf, Furbearer trapping.

PROPOSED BY: Alaska Wildlife Alliance

WHAT WOULD THE PROPOSAL DO? This proposal would return Unit 2 wolf harvest management from a strategy where the department annually varies harvest opportunity to maintain the population within a board-established population objective range to one where harvest is managed using a harvest guideline level ranging from 20% to 35% of the estimated population size as annually established by the board.

WHAT ARE THE CURRENT REGULATIONS? The department shall manage harvest by hunting and trapping as follows:

(1) Wolves: the annual harvest of wolves in Unit 2 should be managed to maintain the unit-wide population within a range of 150 – 200 wolves.

There is a positive C&T finding for wolves in Unit 2 and an ANS of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The season would be closed by emergency order once harvest reached the quota. If adopted seasons length would be unpredictable for trappers and hunter. In addition, the Unit 2 wolf regulatory and logistical complexity would increase in requiring the Alaska Board of Game, rather than the department, to meet annually to determine the available harvest, and to coordinate with the U.S. Forest Service to announce and open hunting and trapping seasons. The department works closely in determining Unit 2 wolf trapping season lengths based on previous years harvest and abundance estimates.

BACKGROUND: Unit 2 wolf management has undergone many changes through time to address management and conservation concerns.

- In 1997, the board changed the management strategy to a harvest guideline level (HGL) and shortened the hunting season from a 9-month season to 4 months and the trapping season from over 5 months to 4 months.
- From 1997–1999, the board established HGL was set at 25% of the most recent population estimate.
- From 2000–2013, the board established HGL increased to 30%.
- In 2011, the board shortened the state sealing period to 14 days.
- In 2013, the department collected data for the first population estimate using wolf genetics and spatially explicit capture recapture (SECR) methods.
- In 2014, the department first used the SECR population estimate with a HGL of 30% to set the harvest quota (Figure 52-1).
- From 2015–2018, the board reduced the HGL in regulation to 20%, but during 2015-2016

the department further reduced the HGL by 50% due to low population estimates.

- From 2019–present, the department has managed harvest to meet a board-established fall population objective of 150-200 wolves. In 2019 the board also removed the 14-day sealing requirement for wolves harvested in Unit 2 and reinstated the requirement to seal wolves within 30 days of the close of the season.
- In 2021, the board required that wolves taken in Unit 2 be sequentially numbered or marked, and that hunters and trappers report harvest to the department within 7 days of take, and that hides must be sealed within 15 days of take.

When developing the current Unit 2 wolf management strategy the department had several goals, including ensuring sustainable harvest management, providing managers with the necessary guidance from the board while allowing the flexibility needed to manage a dynamic wolf population, and providing the public with a consistent strategy that would not change every few years and that also included clear goals for this high-profile population. The current management strategy employs methods that are reliable, realistic to implement, and that offer predictable and sustainable harvest opportunity. It is important to recognize that since first implementing this strategy in 2019, the department has successfully used it to maintain the Unit 2 wolf population within or above the board-established fall population objective range.

Returning to a quota-based harvest management strategy would be a step backward. Basing a harvest quota on a fixed percentage in regulation limits the department's flexibility to alter management to maintain the population within an objective range. The proposal requires the board to establish a new HGL each year, rather than on the board's current three-year cycle which would be an additional step in the process of announcing and opening Unit 2 wolf hunting and trapping seasons.

Quota-based systems also give a misleading impression of the precision with which harvest can be monitored. They rely on all trappers reporting as required by regulation and fail to recognize that there is no trap check requirement and that trappers cannot predict how many wolves they will recover during each trap check. For these reasons, managing harvest to meet quotas is difficult, particularly when quotas are low. For reference, in 2016, 2017, and 2018 the harvest quotas were 11, 46, and 45, respectively, and reported harvest was 30, 62, and 46 wolves, respectively.

The primary goal of this proposal appears to be placing a numerical cap on the number of Unit 2 wolves that can be harvested each year. However, any quota will be based on an estimate of the population size from the prior year. An estimate is just that, an estimate, not a count of the true population size, and an estimate from the previous fall does not account for changes in population size over the intervening months. The department always presents population estimates within a range of uncertainty (confidence interval) that is highly likely to include the true population size. The department uses the point estimate for management because that is the value most likely to be correct given the data collected that year.

Any management strategy should recognize the uncertainty associated with estimates. The department's current harvest management does that by offering a specific amount of harvest opportunity that will result in harvest that is likely to maintain the population within the objective range. There is no numerical cap on harvest, but harvest is effectively capped by length of the trapping season. Managing by season length has been successful in maintaining Unit 2 wolf abundance within population objectives established by the board.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. The current management strategy was adopted in 2019 after an extensive public process and has proved successful in keeping the Unit 2 wolf population estimate within the board-established objectives that has successfully sustained wolf populations and their uses.

COST ANALYSIS: Adopting this proposal is unlikely to result in additional cost to the department.

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PROPOSAL 53 – 5 AAC. 92.008, 85.056, 84.270. Harvest guideline levels, Hunting seasons and bag limits for wolf, Furbearer trapping.

PROPOSED BY: Alaska Wildlife Alliance

WHAT WOULD THE PROPOSAL DO?

Amend the Unit 2 wolf management strategy to the following:

An estimated unreported mortality rate of 35%-50% shall be utilized in establishing an annual harvest quota of wolves in Unit 2.

WHAT ARE THE CURRENT REGULATIONS?

The department shall manage harvest by hunting and trapping as follows:

(1) Wolves: the annual harvest of wolves in Unit 2 should be managed to maintain the unit-wide population within a range of 150 – 200 wolves.

There is a positive C&T finding for wolves in Unit 2 and an ANS of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

Unit 2 wolf harvest management would revert to a quota-based system that incorporates an unreported mortality rate of 35%-50%. Instead of managing harvest to meet a publicly vetted and board-established population objective by varying season length, managers would establish a harvest quota and close the hunting and trapping seasons by emergency order when that quota is reached. Reported harvest and a presumed percentage of unreported take would count towards the

quota. The proposed changes would unnecessarily reduce hunting and trapping opportunity for Unit 2 wolves.

BACKGROUND: Management of Unit 2 wolf harvest was based on a harvest quota and in-season harvest monitoring from 1997–2018. Over the 22 years this harvest management strategy was used, annual harvest quotas were based on a harvest guideline level in regulation that ranged from 20% to 30% of the most recent population estimate and a 14-day sealing period. When harvest approached the quota, the department and the U.S. Forest Service (USFS) would close the state and federal seasons by emergency order. Annual population estimates were not feasible until the department developed a DNA-based wolf population estimation protocol in 2013. Those estimates were first incorporated into management in 2015. Prior to 2015 harvest quotas were calculated using assumed population sizes based on estimates from 1994 and 2003. From 1997-2014 the proportion of the current wolf population represented by each year's harvest quota was unknown. Harvest rarely approached the quotas, and seasons were rarely closed by emergency order.

Once annual population estimates were incorporated into management, the quota system resulted in unpredictable and often short trapping seasons, and reported harvest substantially surpassed the quota in 2 of the 4 years managed in this way. Even with a 14-day sealing period, managers had difficulty monitoring harvest relative to the quota. Trappers also noted this strategy limited their flexibility to plan, and at times, forced them to travel in unfavorable weather conditions to close their traplines in compliance with emergency orders. Finally, basing annual harvest quotas on a fixed percentage in regulation provided no measurable goal for managers on the appropriate size of the Unit 2 wolf population.

To address these shortcomings, from 2017-2019 the department worked with stakeholders to develop a new management approach and in 2019 submitted proposals to the board to implement a flexible harvest management strategy. That strategy allowed the department to annually vary harvest opportunity relative to the most recent population estimate to maintain the Unit 2 wolf population within a board-established population objective. It also provided predictability to trappers by announcing a season length prior to the opening day of each year's trapping season. Since 2019 population estimates indicate that this management strategy has been successful at maintaining the fall population within or above the objective range in every year.

The department is aware that unreported take of Unit 2 wolves occurs. Two department studies involving wolves radiocollared in Unit 2 documented unreported human-caused morality, and in 2018 an individual was convicted of unlawful take of Unit 2 wolves. This proposal suggests that unreported take amounts to 35%-50% of all human-caused wolf mortality each year, but that is a misunderstanding of mortality reported by the department. The department studies cited in this proposal reported that 38%-47% of collared wolves died by unreported human-caused mortality. However, those are cumulative rates over several years, which are not appropriate for use in annual harvest management. Further, those studies involved wolves collared along the road system where wolves are more likely to encounter people and experience higher rates of unreported mortality

than wolves in more remote areas of Unit 2. Population estimates and long-term trajectory of the population indicate that annual rates of unreported human-caused mortality for the entire Unit 2 wolf population are likely much lower than suggested in this proposal.

Accurately estimating rates of unreported human-caused mortality would require maintaining a large number of radiocollared wolves and monitoring their survival. Fortunately, that is unnecessary because the department's current Unit 2 wolf harvest management strategy is based on annual population estimates that measure net change in population size. Net change accounts for births, immigration, emigration, and all forms of mortality (natural, reported, and unreported human-caused mortality). Adding an additional factor to account for unreported mortality would be redundant.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. The department's current management strategy based on annual population estimates that measure net change in abundance already accounts for all ways wolves enter and leave the Unit 2 population. Imposing an additional factor to account for unreported mortality would be redundant and could unnecessarily limit sustainable harvest opportunity. This proposal also suggests returning to a quota-based harvest management system but fails to indicate how harvest quotas would be determined or a measurable goal for the Unit 2 wolf population.

COST ANALYSIS: If adopted, this proposal will result in significant costs to the department to maintain an appropriate radiocollared wolf sample size.

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PROPOSAL 54 – 5 AAC 92.008, 85.056, 84.270. Harvest guideline levels, Hunting seasons and bag limits for wolf, Furbearer trapping.

PROPOSED BY: Alaska Wildlife Alliance

WHAT WOULD THE PROPOSAL DO? Task the department with identifying 2/3rds of Unit 2 land area for protected status for wolves. Work to ensure the protected areas have relatively high deer carrying capacity and are large enough to be buffered from trapping pressure.

WHAT ARE THE CURRENT REGULATIONS? Areas closed to trapping: Joe Mace Island Marine Park, a small island off Point Baker on Prince of Wales Island.

There is a positive customary and traditional use finding for wolves in Unit 2.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would close 2/3 of land in Unit 2 to wolf harvest significantly reducing hunting and trapping opportunity unnecessarily.

BACKGROUND: Throughout Alaska, state and federal regulations close specific areas to

hunting and trapping for specific reasons. Board of Game regulations most often prohibit harvest for reasons of public safety (ex. harvest of big game with a firearm within a certain distance of roads) or conservation (ex. marten on Kuiu Island in GMU 3). However, neither the board nor the department generally closes opportunity in areas where sustainable harvest can be safely accommodated.

Unit 2 has a long history of sustainable wolf harvest. From 1997-2018 the department managed Unit 2 wolf harvest under an annual harvest quota, but that system provided managers with little flexibility and no measurable goals for the population. It also required closing seasons when the quota was reached, often with only short notice to trappers. To address these shortcomings, from 2017-2019 the department worked with stakeholders to develop a new management approach and in 2019 submitted proposals to implement a flexible harvest management strategy. That strategy allowed the department to annually vary harvest opportunity relative to the most recent population estimate to maintain the Unit 2 wolf population within a publicly vetted and board-established population objective. It also provided predictability to trappers by announcing a season length prior to the opening day of each year's trapping season. Since 2019, annual population estimates indicate that this management strategy has been successful at maintaining the fall population within or above the objective range in every year.

This proposal fails to acknowledge the substantial role that federal subsistence regulations play in managing harvest of Unit 2 wolves. Nearly 80% of land in Unit 2 is federally managed by the U. S. Forest Service, and commonly over 90% of wolves harvested in Unit 2 are taken by federally qualified subsistence users who reside in Unit 2. Consequently, without a similar change in federal subsistence regulations the change proposed here would have a negligible effect on wolf harvest.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it is unnecessary for sustainable wolf harvest opportunity and has the potential to disenfranchise wolf hunters and trappers who lived farther from the 1/3 of Unit 2 that would remain open to wolf harvest.

COST ANALYSIS: Adoption of this proposal would result in unknown, additional costs for the department.

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