



**Submitted by:** Ken Madsen

**Community of Residence:** Peterburg AK

**Comment:**

I am against proposal 22,would like to keep it the way it is, been riding a bike there for 15 years and really don't have a problem riding the limited amount of road system there is.To open this area to motor vehicles would be a huge detriment to this area, the roads will get worse there will be more vehicles brought over,more junk that will get abandoned, and it will spoil what minimal moose encounters we have now, never fun to have someone drive up and spook them off.A prime example of what happens to an area open to vehicles is theTonka area, which has at least 100 cars there and 25 are broke down on the side of the road.I think this will just open a pandoras box and ruin the 1 month of no vehicles we have now.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 22:** Oppose

---



**Submitted by:** Kevin Main

**Community of Residence:** Petersburg, Alaska

**Comment:**

I am opposed to proposals 24 and 25. Both proposals involve opening black bear hunts in the Petersburg creek drainage.

Currently, this is the only protected area for black bear on Kupreanof Island, the remainder is already open. Allowing hunts, especially during the spring, will cause increased and unnecessary user conflict. I hope the board will recognize that with the entire rest of the island open, there is no need to remove the protections for this single area.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 24:** Oppose

**Proposal 25:** Oppose

---



**Submitted by:** Casey McConnell

**Community of Residence:** Hoonah, Alaska

**Comment:**

I oppose proposal 36 in its entirety. Author of this proposal believes a mired of condition conspire against him, reducing his (and potentially others) ability to harvest many sooty grouse ear was to access areas. Author states that new snow machines and fancy skies open access and allow owners of these tools to out-compete hunters pursuing grouse on foot alone. The author also believes that local grouse populations are depressed and a proposes a slight daily reduction in bag limited would alleviate problems caused by more hunters.

To rebut the general over harvest statement I believe that while grouse populations (like every wild species) fluctuate naturally, the hunting pressure from one year should not significantly -if at all - impact the hunting in

the next year. This is because the vast majority of grouse harvested are males. I would suspect that the percentage to be over 90% male only harvest. Females are largely unaffected by hunters and as male grouse do not help in rearing chicks or building a nest they are not needed past copulation. Hunting seasons also end before the breeding season ends, so that any areas pressured during the early part of spring can be re-colonized by males from other unpressured areas or females may move towards hillsides with males actively calling. Additionally, most grouse wings turned into AD are found to be of young birds; even from areas that are rarely hunted or pressured. This indicates that natural mortality is high on male sooty grouse. Reducing the bag limit to "save" grouse for other hunters or future seasons is not likely effective.

The author of proposal 36 also claims that fishermen are now hunting and social media and hunting shows have also increased hunting pressure. I have hunted grouse in Juneau for over 10 years now, and have posted lots of pictures on social media, and been the subject of a grouse hunting film featuring hunters, dogs, and grouse species across the United States. I have never come across another grouse hunter in the woods, and only on two occasions have even seen another grouse hunter at a trailhead or pull-out spot. Both occasions each of us was successful in hunting different hillsides. Furthermore I have never hiked into areas hunting sooty grouse where snowmachiners go; its too far on foot to effectively get there, hunt, and get back in a days hike Also, I have never seen snow machine tracks or ski trails in areas where I do hunt. Lastly, I have never need to hike into an area with "perilous cliffs" described by the author as the last holdout for pressured grouse unto by all the perceived competition.

To me, this proposal seeks to remedy a non-issue, implementing it would not satisfy the authors desire to harvest more "easy" grouse, and subdividing the Juneau area into road crossing drainages vs non road crossing drainages overcomplicated the very simple regulations currently in place.

---

**Submitted by:** Casey McConnell

**Community of Residence:** Hoonah, Alaska

**Comment:**

I oppose proposal 37 which seeks to reduce the bag limit of ptarmigan from 20 to 5 in the Juneau area.

The author proposes that snowmachiners are harvesting too many ptarmigan and are reducing the population to a detrimental level. I have not personally noticed a decrease and even if snowmachiners were harvesting many birds their use of the Juneau area is limited to a couple small areas on Douglas Island and one small area on the mainland. Because there are vast areas where snow machines cannot access (yet ptarmigan inhabit) I find it impossible to conceive that any localized pressure could depress a region-wide population to the degree described by the author.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 36:** Oppose

**Proposal 37:** Oppose

---



**Submitted by:** Karin Mccullough

**Community of Residence:** Petersburg, Alasks

**Comment:**

Proposal 24 & 25

I do not support changes for black bear hunting in the Petersburg Creek Drainage

I support no hunting by gun or by bow for black bear in the Petersburg Creek Drainage

My reasons:

1) In the spring there would be a conflict of user groups. Spring sport fishing (I am a participant) brings a significant number of sport fishing folk. Residents on their own and guided folk

2) Residents of Petersburg Borough and visitors enjoy visiting Petersburg Creek to view bear. It is close to Petersburg

3). Petersburg drainage area is the only area in unit 3 that does not allow hunting of black bear by either bow or gun All other areas in unit 3 are open to black bear hunting

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 24:** Oppose

**Proposal 25:** Oppose



**Submitted by:** Margaret McGinnis

**Community of Residence:** Hull, MA

**Comment:**

I am writing to support Proposals 145, 147 and 149-154, as well as the proposals highlighted below. Thank you.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 45:** Support

**Proposal 49:** Support

**Proposal 52:** Support

**Proposal 47:** Support

**Proposal 50:** Support

**Proposal 53:** Support

**Proposal 48:** Support

**Proposal 51:** Support

**Proposal 54:** Support



**Submitted by:** Shaun Mcgraw

**Community of Residence:** Naukati Bay, AK

**Comment:**

Proposal #45

I strongly agree with raising the population objective of wolves in unit 2.

I have lived here many years and have seen very little evidence of wolves.

The only people who say that there is already a healthy population of wolves or that we need to harvest more are people who would prefer them all gone. To rely on anecdotal information gathered from them as a basis for setting objectives, as opposed to scientific methodology, could lead to tragic consequences for the species and in turn the ecosystem of the area.

**Submitted by:** Shaun Mcgraw

**Community of Residence:** Naukati Bay, AK

**Comment:**

Proposal #201

I support Proposal #201.

I believe a management plan for sea otters based on scientific methodology should be established by the state.

**Submitted by:** Shaun Mcgraw

**Community of Residence:** Naukati Bay, AK

**Comment:**

Proposal #202

I oppose proposal #202.

Emergency closures should be utilized to maintain scientifically established healthy wolf populations.

**Submitted by:** Shaun Mcgraw

**Community of Residence:** Naukati Bay, AK

**Comment:**

Please see proposal survey below.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 45:** Support  
**Proposal 46:** Oppose  
**Proposal 47:** Support

**Proposal 48:** Support  
**Proposal 49:** Support  
**Proposal 50:** Support

**Proposal 51:** Support  
**Proposal 52:** Support  
**Proposal 53:** Support

**Proposal 54:** Support



**Submitted by:** Chris McMurren

**Community of Residence:** Wrangell Ak 99929

**Comment:**

For props 17 and 18 I am interested in only a rural hunt for that area. That being said, In the name of game management the area seems to have a harvestable population. In addition it appears that there is a decrease in the deer population in the high elk traffic areas, thanks

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 1:** Oppose  
**Proposal 3:** Support  
**Proposal 4:** Support  
**Proposal 16:** Support  
**Proposal 17:** Support with Amendment

**Proposal 18:** Support with Amendment  
**Proposal 19:** Support  
**Proposal 20:** Support  
**Proposal 22:** Support  
**Proposal 23:** Support  
**Proposal 27:** Oppose

**Proposal 33:** Support  
**Proposal 42:** Oppose  
**Proposal 43:** Oppose  
**Proposal 44:** Oppose  
**Proposal 45:** Support  
**Proposal 46:** Support  
**Proposal 47:** Oppose

**Proposal 48:** Oppose  
**Proposal 49:** Oppose  
**Proposal 50:** Oppose  
**Proposal 51:** Oppose  
**Proposal 52:** Oppose  
**Proposal 54:** Oppose



**Submitted by:** K J Metcalf

**Community of Residence:** Juneau

**Comment:**

Opposed to PROPOSAL 12 5 AAC 92.510. Areas closed to hunting.

I have extensive experience in Mitchell Bay - I was the first Monument Ranger (Forest Service) and worked extensively with Angoon. Retired and worked and lived in Angoon for 18 years. Conducted week long youth canoe camps for Angoon youth.

My experience working with and being schooled by Angoon elders is that to open Mitchell Bay to bear hunting is to invite user conflict that will not benefit anyone. Angoon is desperate to create local employment focused on non-consumptive wildlife viewing and cultural understanding and appreciation. Mitchell Bay bear hunting would be a significant intrusion and conflict to Angoon's interest.

The area was closed to bear hunting by the BOG because of this very conflict. Please do not recreate the conflict.

The suggesting that fewer bears will promote more deer is not sound science - it has no merit.

Thank You, KJ Metcalf

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 12:** Oppose



**PC107**

**Submitted by:** Ryan Miller

**Community of Residence:** Wrangell alaska

**Comment:**

After hunting zerembo island for the last 20 years I have watched the elk herd grow and and move to different parts of the island from the beach to the middle of the island branching off into multiple herd we have seen sine and elk in places over the last few years that we have never before

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 17:** Support

---



**PC108**

**Submitted by:** Trevor Miller

**Community of Residence:** Wrangell, AK

**Comment:**

I am writing this about Proposal 27. I feel this proposal is unfair to the trappers in our community, most of us trappers are looking to catch a few animals and save some deer. The wolves seem to run the roads in the winter when we are trapping and the deer seem to stay off the roads, making it a good place to put our traps near. I don't disagree with some sort of a restriction within a close proximity of the town, but to make it 100 yards off a drivable road or hiking trail across the whole island seems to be a little much. The wolves in areas run the roads especially where people are not going in the winter. I see most of my wolf sign in the roads, but way out the road in places only accessible by snowmobile or four wheeler in rare cases. These are places people never go in the winter. In my 3 years of trapping I have only ever passed one other person out by my trap line and they were chopping fire wood. I also have never had a problem with a person or pet on my trap line. I could see it being fair if trappers had to put up a trap sign, but to jump straight to a restriction on where we can trap seems unfair.

Thank you

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 27:** Oppose

---



**PC109**

**Submitted by:** Ronald Miller

**Community of Residence:** 441 Church St

**Comment:**

Vote yes for proposal 17. I support a draw hint on Zarembo Island for Elk.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 17:** Support

---



**Submitted by:** Martin Morris

**Community of Residence:** Juneau, Alaska

**Comment:**

I am against lowering the deer harvest from 6 to 4, the deer population, according to scientists at Dept of Fish and Game, the deer population is healthy and can support 6 deer being harvested ensuring a healthy population and a sustainable environment for future deer populations to thrive for future hunters. Reducing it would have a significant impact on people who harvest their own meat for the year, placing an unnecessary burden and significant cost of replacing deer meat with store bought meat.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

- |                             |                             |                             |                             |
|-----------------------------|-----------------------------|-----------------------------|-----------------------------|
| <b>Proposal 10:</b> Oppose  | <b>Proposal 29:</b> Support | <b>Proposal 37:</b> Oppose  | <b>Proposal 41:</b> Support |
| <b>Proposal 11:</b> Oppose  | <b>Proposal 31:</b> Support | <b>Proposal 38:</b> Support |                             |
| <b>Proposal 21:</b> Oppose  | <b>Proposal 32:</b> Support | <b>Proposal 39:</b> Support |                             |
| <b>Proposal 28:</b> Support | <b>Proposal 36:</b> Oppose  | <b>Proposal 40:</b> Oppose  |                             |



**Submitted by:** Mark Mow

**Community of Residence:** Juneau

**Comment:**

Prop. 10/11 is ludicrous. On the ground observations reveal an over abundance of deer which will impact health of the herds. By allowing hunter's to help control the deer population assures a healthy and long lasting deer environment.

Prop. 41 to eliminate the DIWMA is critical to prolong the health and well-being of the few deer that are left on Douglas. Wolf management is a proven method to help obtain a delicate balance between wolf/deer numbers.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

- |                            |                             |
|----------------------------|-----------------------------|
| <b>Proposal 10:</b> Oppose | <b>Proposal 21:</b> Oppose  |
| <b>Proposal 11:</b> Oppose | <b>Proposal 41:</b> Support |



**Submitted by:** Lucas Mullen

**Community of Residence:** Petersburg, Alaska

**Comment:**

My name is Lucas Mullen, I'm a registered big game guide in units 1 and 4 who is currently residing in Petersburg. I am opposed to this proposal. There is plenty area and opportunity to hunt black bear in and around the Petersburg vicinity. With Petersburg creek drainage being so close to town and a very popular boating and recreational area especially in the spring there will be no doubt negative interactions between user groups if this were to pass.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

- Proposal 24:** Oppose

**Submitted by:** Lucas Mullen

**Community of Residence:** Petersburg, Alaska

**Comment:**

My name is Lucas Mullen, I'm a registered big game guide in units 1 and 4 who is currently residing in Petersburg. I am opposed to this proposal. After the extremely large harvest of 49 brown bear in the adjoining unit 1D in the year 2020, it is unwise to open the nearby area to an increase in harvest of brown bear in the area.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 34:** Oppose

---

**Submitted by:** Lucas Mullen

**Community of Residence:** Petersburg, Alaska

**Comment:**

My name is Lucas Mullen, I'm a registered big game guide in units 1 and 4 who is currently residing in Petersburg. I am opposed to proposal 12 in regards to opening up brown bear hunting in Mitchell Bay. Mitchell Bay has been closed for years and using brown bear predation on deer fawns as a reason to in the future increase deer harvest doesn't make sense. The harvest of a few bears in the area I doubt will have much impact on overall deer numbers. Of the number of fawns or adult deer killed by bears in the bay, winter die off plays a much more significant role on deer populations in the area.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 12:** Oppose

---



**Submitted by:** Kelly O'Connor Demko

**Community of Residence:** Petersburg, AK

**Comment:**

Comments regarding Proposal 24 and 25.

I believe there should not be bear hunting allowed up the Petersburg Creek Drainage for several reasons.

First, I and many others I know use the area specifically for bear viewing. I often take my friends up the creek kayaking in the hopes of seeing bears, which we often do! It is important for people like me to be able to go to a nearby place to see these bears in their natural habitat and in a protected wilderness area.

Second, I see hunting in direct conflict with other uses specifically recreation, fishing and bear viewing. This area is widely used by many people young and old for fishing and hiking and small boating, motorized and unmotorized.

Third, there are many other places available for hunting bear and this is a very small area to preserve for the local people to view bears. People have plenty of places to go on guided and unguided hunts.

Fourth, I have an idea this is being driven by one party interested in a commercial venture and I believe a commercial venture would have no problem getting their clients a bear hunt in some other beautiful areas of SE Alaska.



I also have concerns that the Board of Fish and Game has not taken the time and made an appropriate effort to gather comments by people who would be directly affected by these proposals.

I believe there should not be bear hunting allowed up the Petersburg Creek Drainage.

Thank you. Kelly O'Connor Demko

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 24:** Oppose

**Proposal 25:** Oppose

---



United States Department of the Interior  
Office of Subsistence Management  
1011 East Tudor Road MS 121  
Anchorage, Alaska 99503-6199



**PC114**

In Reply Refer To:  
SE BOG/22136.LG

Mr. Jerry Burnett, Chairman  
Attention: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

DEC 30 2022

Dear Chairman Hoffman:

The Office of Subsistence Management (OSM) appreciates the opportunity to comment on the Alaska Board of Game proposals during the January 20-24, 2023 Southeast Region Meeting.

OSM, working with other Federal agencies, reviewed each of these proposals. The attached document includes OSM's comments regarding proposals that have the potential to impact federally qualified subsistence users or associated wildlife resources. During the meeting, OSM may wish to comment on other agenda items that might impact federally qualified subsistence users or wildlife resources.

Again, OSM appreciates the opportunity to comment on these important regulatory matters and looks forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, at 907-786-3822 or [george\\_pappas@fws.gov](mailto:george_pappas@fws.gov), with any questions you have concerning this material.

Sincerely,

Anee Howard  
Acting Assistant Regional Director  
Office of Subsistence Management

Enclosure

cc: Federal Subsistence Board  
Office of Subsistence Management  
Interagency Staff Committee  
Southeast Alaska Regional Advisory Council  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game

Mr. Jerry Burnett

2



**PC114**

Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Administrative Record



**RECOMMENDATIONS**

**ALASKA BOARD OF GAME PROPOSALS**

**Southeast Meeting**

**January 20-24, 2023**

**Ketchikan, Alaska**

**Office of Subsistence Management (OSM)**



**PROPOSAL 3 – 5 AAC 92.165. Sealing of bear skins and skulls.** Remove the requirement for residents to seal black bear skulls harvested in Units 1 - 4.

**Current Federal Regulations:**

**§100.26 Subsistence taking of wildlife**

(j)(1) Sealing requirements for black bears of all color phases taken apply in Units 1– 7, 13–17, and 20.

**Is a similar issue being addressed by the Federal Subsistence Board?** No.

**Impact to Federal subsistence users/wildlife:** Removing the sealing requirement would be less burdensome for Federally qualified subsistence users. However, adoption of this proposal could result in conservation concerns as sealing is currently the only way black bear populations are monitored in these units. Due to logistical issues of Unit 1 and its vast, remote forested areas, population surveys are not possible (Sell 2014).

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** Proposal 3.

**Rationale:** While requiring users to seal black bear skulls can be a burden to Federally qualified subsistence users, sealing is the primary method used to monitor black bear populations in these units. In order to sustainably manage the population, this data is necessary to detect potential conservation concerns and ensure the continued viability of the species for subsistence uses.

Literature Cited

Sell, S. 2014. Unit 1D Black bear Chapter 1. Pages 4-1 – 4-16 in P. Harper and L. A. McCarthy, editors. Black bear Management report 1 July 2010-30 June 2013. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2015-5. Juneau, AK.

**PROPOSAL 4 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Change the resident bag limit for brown bear in Unit 1 to one bear every two years.

**Current Federal Regulations:**

**Unit 1 – Brown Bear**

*Brown Bear: 1 bear every four regulatory years by State registration permit only.*

*Sept. 15 – Dec. 31  
Mar. 15 – May 31*



**Is a similar issue being addressed by the Federal Subsistence Board?** No

**Impact to Federal subsistence users/wildlife:** Adoption of this proposal would increase hunting opportunities for Federally qualified subsistence users hunting under State regulations and may increase the number of brown bears harvested in Unit 1. Based on harvest data from RY09-18, an average of 29 brown bears are harvested each year in Unit 1 (Churchwell 2021).

An increase in harvest may cause conservation concerns for Unit 1 brown bears as the population of brown bears in most of the unit is unknown. Brown bear population data is only collected in the select areas of Bradfield Canal, Unuk River, and Berners Bay. Additionally, the data available for these areas is outdated and from research conducted in 2006 and 2007 (Bethune 2015). Based on data collected during the sealing process, the Unit 1 brown bear population is relatively stable (Churchwell 2021). However due to the large home ranges of brown bears, their population density is typically low. In Unit 1, the bears are known to have a home range four times larger than the sows (Bethune 2015).

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** Proposal 4.

**Rationale:** With the lack of population data, brown bear populations should be managed conservatively as an increase in harvest could cause a conservation concern.

Literature Cited

Bethune, S. 2015. Unit 1 Brown bear Chapter 1. Pages 1-1 – 1-20 in P. Harper, editor. Brown bear Management Report 1 July 2012-30 July 2014. Alaska Department of Fish and Game Species Management Report ADF&G/DWC/SMR&P-2015-1. Juneau, AK.

Churchwell, R. 2021. Brown Bear Management Report and Plan, Game Management Unit 1: Report Period 1 July 2014 – 30 July 2019, and Plan Period 1 July 2019 – 30 June 2024. Alaska Department of Fish and Game Species Management Report ADF&G/DWC/SMR&P-2021-10, Juneau, AK. 28pp.

**PROPOSAL 6 – 5 AAC 84.270. Furbearer trapping.** Lengthen river otter trapping seasons in Units 1–4 to align with Unit 5.

**Current Federal Regulations:**

**Units 1, 2, 3, and 4 – River Otter**

*Otter: No limit*

*Dec. 1-Feb. 15*

**Unit 5 – River Otter**



*Otter: No limit*

*Nov. 10-Feb. 15*

**Is a similar issue being addressed by the Federal Subsistence Board?** No

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunities for Federally qualified subsistence users trapping under State regulations. River otter are a common species in Region I, and their abundance is believed to be stable in all units. Although no formal population surveys have occurred, ADF&G bases estimates on anecdotal reports from the public and incidental observations during other wildlife surveys. These estimates show no evidence of a decline in river otter abundance. Harvest of river otter remained consistent at levels lower than other trapped species during the reporting period of 2012–2017 (Bethune 2019a, 2019b, 2020; Dorendorf 2019a, 2019b; Koch 2020).

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 6.

**Rationale:** This proposal would increase trapping opportunity for Federally qualified subsistence users. Extending the season is of little to no conservation concern as river otter populations have remained stable under the current “no harvest limits” in Units 1–5. Additionally, reduced trapping effort in recent years and low overall harvest, suggest any increased harvest from this proposal may not impact the population.

#### Literature Cited

Bethune, S. W. 2019a. Furbearer management report and plan, Game Management Unit 1B: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-10, Juneau

Bethune, S.W. 2019b. Furbearer management report and plan, Game Management Unit 4: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-9, Juneau.

Bethune, S. W. 2020. Furbearer management report and plan, Game Management Unit 3: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-20, Juneau.

Dorendorf, R. R. 2019a. Furbearer management report and plan, Game Management Unit 1A: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-7, Juneau.

Dorendorf, R. R. 2019b. Furbearer management report and plan, Game Management Unit 2: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-8, Juneau.



Koch, C. H. 2020. Furbearer management report and plan, Game Management Unit 1D: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-3, Juneau.

**PROPOSAL 7 – 5 AAC 84.270. Furbearer trapping.** Extend marten trapping seasons to align with wolverine seasons in portions of Units 1 - 4 and 5.

**Current Federal Regulations:**

**Units 1, 2, 4 – Marten**

*Marten: No Limit* *Dec. 1–Feb. 15*

**Unit 3 – Marten**

*Marten: No Limit (except on Kuiu Island)* *Dec. 1–Feb. 15*

*Marten: Kuiu Island portion of Unit 3. No limit* *Dec. 1–31*

**Unit 5 – Marten**

*Marten: No Limit* *Nov. 10–Feb. 15*

**Is a similar issue being addressed by the Federal Subsistence Board?** No

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunities for Federally qualified subsistence users trapping under State regulations. Marten are the most trapped species in most units of Region I, and their abundance is believed to be stable in all units (Bethune 2019a, 2019b, 2020; Churchwell 2019; Dorendorf 2019a, 2019b; Koch 2020). Although estimates are based on anecdotal reports from the public and incidental observations during other wildlife surveys, there is no evidence that marten abundance is declining. Harvest of marten remained stable for the 2012-2017 reporting period.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 7.

**Rationale:** This proposal would increase trapping opportunity for Federally qualified subsistence users. Extending the season is of little to no conservation concern as marten populations have remained stable under the current “no harvest limits” in Units 1–5. Recent trapping effort has remained stable at lower than historical levels, so any increased harvest from this proposal may not impact the population.





### Literature Cited

Bethune, S. W. 2019a. Furbearer management report and plan, Game Management Unit 1B: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-10, Juneau

Bethune, S.W. 2019b. Furbearer management report and plan, Game Management Unit 4: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-9, Juneau.

Bethune, S. W. 2020. Furbearer management report and plan, Game Management Unit 3: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-20, Juneau.

Churchwell, R.T. 2019. Furbearer management report and plan, Game Management Unit 5: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-12, Juneau.

Dorendorf, R. R. 2019a. Furbearer management report and plan, Game Management Unit 1A: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-7, Juneau.

Dorendorf, R. R. 2019b. Furbearer management report and plan, Game Management Unit 2: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-8, Juneau.

Koch, C. H. 2020. Furbearer management report and plan, Game Management Unit 1D: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-3, Juneau.

**PROPOSAL 8 – 5 AAC 84.270. Furbearer trapping.** Extend the marten trapping season in Units 1 and 2.

See comments for Proposal 7.

**PROPOSAL 9 – 5 AAC 84.270. Furbearer trapping.** Extend the wolverine trapping season to March 15 in Units 1–5.

### **Current Federal Regulations:**

#### **Units 1–5 – Wolverine**

*Wolverine: No limit*

*Nov. 10-Mar. 1*



**Is a similar issue being addressed by the Federal Subsistence Board?** No

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunities for Federally qualified subsistence users trapping under State regulations. Wolverine are one of the least trapped species in most units of Region I (either because of their absence or their nature of occurring at low densities), but abundance is believed to be stable in all units of Region I where they are found (Bethune 2019a, 2020; Churchwell 2019; Dorendorf 2019a; Koch 2020). Although estimates are based on anecdotal reports from the public and incidental observations during other wildlife surveys, there is no evidence that wolverine abundance is declining. However, the season extension would overlap with the wolverine denning period, potentially resulting in the unsustainable harvest of denning females with kits.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on Proposal 9.

**Rationale:** This proposal would increase trapping opportunity for Federally qualified subsistence users. As overall trapping pressure and harvest is low and as wolverine populations have remained stable under the current “no harvest limits” in Units 1–5, any increased harvest from this proposal may not impact the population. However, conservation concerns may also occur through the unsustainable harvest of reproductive female wolverines.

Literature Cited

Bethune, S. W. 2019a. Furbearer management report and plan, Game Management Unit 1B: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-10, Juneau

Bethune, S. W. 2020. Furbearer management report and plan, Game Management Unit 3: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-20, Juneau.

Churchwell, R.T. 2019. Furbearer management report and plan, Game Management Unit 5: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-12, Juneau.

Dorendorf, R. R. 2019a. Furbearer management report and plan, Game Management Unit 1A: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-7, Juneau.

Koch, C. H. 2020. Furbearer management report and plan, Game Management Unit 1D: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-3, Juneau.



**PROPOSAL 10 – 5 AAC 85.030. Hunting seasons and bag limits for deer.** Decrease the bag limit to four deer in Unit 4, Remainder.

**Current Federal Regulations:**

**Unit 4 - Deer**

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

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. The Board will consider three deferred wildlife proposals concerning deer in Unit 4 at its January 2023 regulatory meeting. Proposal WP22-07, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Southeast Council) requests that Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner in Unit 4 be closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users. Proposal WP22-08, submitted by the Southeast Council, requests that the Northeast Chichagof Controlled Use Area (NECCUA) annual deer harvest limit for non-Federally qualified users be reduced to two male deer. Proposal WP22-10, submitted by Patricia Phillips of Pelican, requests that the deer harvest limit for non-Federally qualified users in Lisianski Inlet and Lisianski Strait be reduced to 4 deer.

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would decrease opportunities for Federally qualified subsistence users hunting deer under State regulations. Federally qualified subsistence users would only be able to harvest four deer on State managed lands, including along beaches below the mean high tide line, which are a popular hunting area. However, this proposal would provide a Federal subsistence priority on Federal public lands and may slightly reduce competition with non-Federally qualified users on Federal public lands.

This proposal is not expected to impact the Unit 4 deer population. Unit 4 has the highest deer population in Alaska, and, according to ADF&G harvest data, only 3% of non-Federally qualified users harvested five or six deer since 2019 when the Alaska Board of Game increased the deer harvest limit in Unit 4, remainder from four to six deer (ADF&G 2022).

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on Proposal 10.

**Rationale:** This proposal would decrease opportunity for Federally qualified subsistence users hunting on State-managed lands but would provide a subsistence priority for deer on Federal public lands. No impact to the deer population is expected.

Literature Cited

Alaska Department of Fish and Game. 2022. Draft comments on Wildlife Proposal WP22-08. September 30, 2022. <https://www.doi.gov/sites/doi.gov/files/9.30.22-wp22-08-adfg-comments-508.pdf>. Accessed November 8, 2022.



**PROPOSAL 11 – 5 AAC 85.030. Hunting seasons and bag limits for deer.** Decrease the bag limit to four deer in Unit 4, Remainder.

See comments for Proposal 10.

**PROPOSAL 12 – 5 AAC 92.510. Areas closed to hunting.** Open the Mitchell Bay Closed Area in Unit 4 to brown bear hunting.

**Current Federal Regulations:** N/A

**Is a similar issue being addressed by the Federal Subsistence Board?** No.

**Impact to Federal subsistence users/wildlife:** This proposal will increase harvest opportunities for Federally qualified subsistence users by allowing them to harvest brown bear inside the Mitchell Bay closed area on State-managed lands. Federally qualified subsistence users can already harvest brown bears on the small amount of Federal lands in this area under Federal regulations. Therefore, adoption of this proposal would align Federal and State regulations, decreasing regulatory complexity. However, there are also public safety concerns of wounded brown bears coming into Angoon and threatening local residents (SERAC 2022). Additionally, the tides in Mitchell Bay can make accessing this area dangerous (SERAC 2022). As the harvest limit would not change, this proposal is not expected to significantly increase the harvest of brown bear or to have any impact on the brown bear population.

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on this proposal.

**Rationale:** This proposal would provide additional opportunity for Federally qualified subsistence users but could create public safety concerns. No impacts to the brown bear population are expected.

Literature Cited

SERAC. 2022. Transcripts of the Southeast Alaska Subsistence Regional Advisory Council proceedings. October 27, 2022. Ketchikan, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

**PROPOSAL 15 – 5 AAC 92.510(a)(5)(B) Areas closed to hunting.** Change the description of the Petersburg Road System Closed Area.

**Current Federal Regulations:**

**§100.26 Subsistence taking of wildlife**

(3)(ii)(A) In the Petersburg vicinity, you may not take ungulates, bears, wolves, and wolverine along a strip one-fourth mile wide on each side of the Mitkof Highway from Milepost 0 to Crystal Lake campground.

**Is a similar issue being addressed by the Federal Subsistence Board?** No



**Impact to Federal subsistence users/wildlife:** Adopting this proposal would further misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023. No impacts to wildlife are expected from this proposal.

**Federal Position/Recommended Action:** OSM is **neutral** on the proposal.

**Rationale:** As this management area occurs in both State and Federal regulations, OSM supports alignment of the area descriptor to minimize user confusion and regulatory complexity. Currently the descriptors are misaligned and adoption of this proposal would further misalign them.

**PROPOSAL 31 – 5 AAC 85.040. Hunting seasons and bag limits for goat.** Lengthen the resident, registration goat hunt in Unit 1C, the Southern end of the Chilkat Range.

**Current Federal Regulations:**

**Unit 1C – Goat**

*Unit 1C, that portion draining into Lynn Canal and Stephens Passage between Antler River and Eagle Glacier and River, and all drainages of the Chilkat Range south of the Endicott River - 1 goat by State registration permit only* Oct. 1– Nov. 30.

**Is a similar issue being addressed by the Federal Subsistence Board?** No

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunity for Federally qualified subsistence users harvesting goat under State regulations, giving them 31 extra days to harvest goat at the beginning of the season within this hunt area. Goat populations are considered stable even though they are at lower levels compared to before the winter of 2006–2007 (Churchwell 2021). This area of Unit 1C is managed by registration permit RG015. Harvest is limited by ADF&G’s point-management system (i.e. 1 point for billies, 2 points for nannies) and monitored closely by a 3-day reporting requirement of successful harvest (Schumacher 2022, pers. comm.). There is little concern for overharvest from this proposal as this hunt area is closed by emergency order if reported harvest approaches or equals the points allotted.

Adopting this proposal would further misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 31.

**Rationale:** This proposal would increase opportunity for Federally qualified subsistence users hunting under State regulations. Goat populations are healthy enough to support harvest, and they are protected from overharvest by registration permits and ADF&G’s point-management system.



Literature Cited

Churchwell, R. T. 2021. Mountain goat management report and plan, Game Management Unit 1C: Report period 1 July 2013–30 June 2018, and plan period 1 July 2018–30 June 2023. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-7, Juneau

Schumacher, T. 2022. Region 1 supervisor. Alaska Department of Fish and Game. Personal communication: e-mail. November 2022.

**PROPOSAL 33 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

Increase the brown bear bag limit in that portion of Unit 1C of the Chilkat Peninsula mainland north of Point Couverden and south of Sullivan Island for resident hunters, from one bear every four regulatory years to one bear every regulatory year.

**Current Federal Regulations:**

**Unit 1C – Brown Bear**

*1 bear every four regulatory years by State registration permit only. Sept. 15 – Dec. 31.  
Mar. 15 – May 31*

**Is a similar issue being addressed by the Federal Subsistence Board?** No

**Impact to Federal subsistence users/wildlife:** Adoption of this proposal would increase hunting opportunity for Federally qualified subsistence users and would likely increase the number of brown bears harvested in a portion of Unit 1C. Currently there are only select areas of Unit 1 where brown bear population data is collected with Berners Bay being the only area in Unit 1C. However, the data available for Berners Bay is outdated and from research conducted in 2006 and 2007 (Bethune 2015). Based on data collected during the sealing process, the Unit 1 brown bear population is relatively stable (Churchwell 2021).

On average, Unit 1C accounts for 35% of the brown bears harvested in Unit 1, which is the second highest of the four subunits. However, in Regulatory Year (RY) 2016 and RY2018, Unit 1C had the largest harvest numbers of brown bears within the Unit 1 subunits (Churchwell 2021). Between RY14-RY18, the average number of permits issued was lower than between RY09-RY13; however, the average number of brown bears harvested was almost double, indicating a substantial increase in harvest success rates (Churchwell 2021). The average age of brown bears harvested from Unit 1C has decreased to 7.3 years old during the RY14-18 from 8.5 years old during RY09-13 (Churchwell 2021).

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.



**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** Proposal 33.

**Rationale:** While local observations and increases in harvest success rates indicate the Unit 1C brown bear population may be growing, population estimates are not available for this area of Unit 1C. With the lack of population data, brown bear populations should be managed conservatively as an increase in harvest numbers could cause a conservation concern.

Literature Cited

Bethune, S. 2015. Unit 1 Brown bear Chapter 1. Pages 1-1 – 1-20 *in* P. Harper, editor. Brown bear Management Report 1 July 2012-30 July 2014. Alaska Department of Fish and Game Species Management Report ADF&G/DWC/SMR&P-2015-1. Juneau, AK.

Churchwell, R. 2021. Brown Bear Management Report and Plan, Game Management Unit 1: Report Period 1 July 2014 – 30 July 2019, and Plan Period 1 July 2019 – 30 June 2024. Alaska Department of Fish and Game Species Management Report ADF&G/DWC/SMR&P-2021-10, Juneau, AK. 28pp.

**PROPOSAL 34 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

Increase the brown bear bag limit in that portion of Unit 1C of the Chilkat Peninsula mainland north of Point Couverden and south of Sullivan Island for resident hunters, from one bear every four regulatory years to one bear every regulatory year.

See comments for Proposal 33.

**PROPOSAL 35 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.**

Extend the bear baiting season for Unit 1D.

**Current Federal Regulations:**

**§100.26 Subsistence taking of wildlife**

(n)(1)(vii)(A) You may hunt black bear with bait in Units 1A, 1B, and 1D between April 15 and June 15.

**Is a similar issue being addressed by the Federal Subsistence Board?** No

**Impact to Federal subsistence users/wildlife:** Adoption of this proposal would provide Federally qualified subsistence users with increased opportunities to harvest black bears under State regulations. In Regulatory Year 2009 (RY09), the most recent year available, 82% of black bears were harvested by local residents, most of whom used the meat for subsistence (Koch 2021).



In Unit 1D, spring harvest accounts for an average of 87% of reported black bear harvests. Of the 87% harvested in the spring, 87% of black bears were harvested over bait from 2010-2013, and 77% of black bears were harvested over bait from 2013-2018, (Koch 2021).

Due to logistical issues of Unit 1 and the vast, remote forested areas, black bear population surveys are not possible. However, Unit 1D is estimated to have the smallest population of black bears within Unit 1 (Sell 2014).

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** Proposal 35.

**Rationale:** A high percentage of bears harvested in Unit 1D are harvested over bait and population surveys are not possible. There is also a concern for overharvest. In RY09, 105 black bears were sealed with only 84 harvest tickets issued in Unit 1D, indicating 20% more bears are harvested than harvest tickets issued (Koch 2021).

With limited ability to collect population data due to habitat and terrain and most of the harvest taking place over bait by residents, extending the baiting season could lead to conservation concerns with the species. With no surveys conducted the potential decrease in population may not be known until the population crashes.

Literature Cited

Koch, C. H. 2021. Black bear Management Report and Plan, Game Management Unit 1D: Report period 1 July 2013 – 30 June 2018, and plan period 1 July 2018 – 30 June 2023. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2021-1. Juneau, AK. 75pp.

Sell, S. 2014. Unit 1D Black bear Chapter 1. Pages 4-1 – 4-16 in P. Harper and L. A. McCarthy, editors. Black bear Management report 1 July 2010-30 June 2013. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2015-5. Juneau, AK.

**PROPOSAL 42 – 5 AAC 85.030. Hunting seasons and bag limits for deer.**

Extend the deer season to December 31, in Unit 1A remainder.

**Current Federal Regulations**

**Unit 1A –Deer**

*4 antlered deer*

*Aug. 1 – Dec. 31*

**Is a similar issue being addressed by the Federal Subsistence Board? No**





**Impact to Federal subsistence users/wildlife:** This proposal would allow additional opportunity for Federally qualified subsistence users to harvest deer under State regulations, particularly along beaches below the mean high tide line, which are a popular hunting area. This proposal would also align Federal and State deer seasons, decreasing regulatory complexity. However, this proposal would also eliminate the Federal subsistence priority. Currently, Federally qualified subsistence users can hunt on Federal public lands during December without any competition from non-Federally qualified users. Therefore, this proposal would increase competition for deer during December.

Little impact to the deer population is expected. In pellet group surveys conducted by ADF&G in Unit 1A, the mean number of pellet groups/plot increased substantially from 2017-2019 over 2010-2015 levels, indicating the Unit 1A deer population is increasing (ADF&G 2022). Furthermore, less than one deer has historically been harvested per hunter in Unit 1A, and over six days of effort have been required on average to harvest one deer (Dorendorf 2020). While deer may be more accessible during December, especially along beaches if there is deep snow, the Unit 1A deer population can likely sustain some increase in harvest, especially since harvest is limited to bucks-only. However, if this proposal is adopted, the harvest limit could be changed to “one antlered deer” to prevent inadvertent harvest or harassment of does if bucks have already dropped their antlers. This would also align with the Federal harvest limit.

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on this proposal.

**Rationale:** This proposal would provide additional opportunity for Federally qualified subsistence users to harvest deer under State regulations during December, but would eliminate the current Federal subsistence priority, potentially impacting subsistence hunts during December on Federal public lands. Little impact to the deer population is expected.

Literature Cited

Alaska Department of Fish and Game. 2022. Draft comments on Wildlife Proposal WP22-08. September 30, 2022. <https://www.doi.gov/sites/doi.gov/files/9.30.22-wp22-08-adfg-comments-508.pdf>. Accessed November 8, 2022.

Dorendorf, Ross. 2020. Deer management report and plan, Game Management Unit 1A: Report period 1 July 2011–30 June 2016, and plan period 1 July 2016–30 June 2021. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-24, Juneau, AK.

**PROPOSAL 43 – 5 AAC 85.040. Hunting seasons and bag limits for goat.** Increase the resident bag limit to two goats in Unit 1A.

**Current Federal Regulations:**

**Unit 1A – Goat**

*Unit 1A, Revillagigedo Island only*

*No open season.*



*Unit 1A and 1B remainder - 2 goats; a State registration permit will be required for the taking of the first goat and a Federal registration permit for the taking of a second goat. The taking of kids or nannies accompanied by kids is prohibited Aug. 1-Dec. 31*

**Is a similar issue being addressed by the Federal Subsistence Board?** No

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunity for Federally qualified subsistence users (FQSUs) hunting goat under State regulations on Revillagigedo Island, although FQSUs are already allowed a second goat on the mainland portion of Unit 1A (which is primarily Federal public lands) under Federal regulations. Currently there is no open Federal goat season on Revillagigedo Island, and there has been no harvest of a second goat from 2004- 2019 by FQSU's in Unit 1A/1B remainder, although permits have been issued (OSM 2022).

The goat population on Revillagigedo Island is introduced, is considered to be abundant by ADF&G (ADF&G 2019), and may be able to support extra harvest. Goats in 1A and 1B remainder on the mainland have a greater chance of in-migration of individuals from areas along the coast and inland (Cross 2022, pers. comm.). This hunt area is managed by registration permit RG001. Harvest is limited by ADF&G's point system (i.e. 1 point for billies, 2 points for nannies) and monitored closely by a 3-day reporting requirement of successful harvest (Schumacher 2022, pers. comm.). There is little concern for overharvest from this proposal as this hunt area is closed by emergency order if reported harvest approaches or equals the points allotted.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 43.

**Rationale:** This proposal would increase opportunity Federally qualified subsistence users. Goat populations are healthy enough to support harvest, and they are protected from overharvest by registration permits and ADF&G's point system.

Literature Cited

ADF&G. 2019. Tab 6.1 Unit 1A Overview. ADF&G. Southeast Region Alaska Board of Game meeting. January 11–15, 2019. Petersburg, AK. <http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=01-11-2019&meeting=petersburg> Accessed November 4, 2022.

Cross, Rob. 2022. Wildlife Biologist. Personal communication, phone call. USFS. Petersburg, AK.

OSM. 2022. Federal permits database. Office of Subsistence Management. [https://subsistence.fws.gov/apex/f?p=104:1:9705720053973:::~:](https://subsistence.fws.gov/apex/f?p=104:1:9705720053973:::) Accessed November 10, 2022.

Schumacher, T. 2022. Region 1 supervisor. Alaska Department of Fish and Game. Personal communication: e-mail. November 2022.



**PROPOSAL 44 – 5 AAC 85.040. Hunting seasons and bag limits for goat.** Extend the goat season in Unit 1A Remainder.

**Current Federal Regulations:**

**Unit 1A – Goat**

<i>Unit 1A, Revillagigedo Island only</i>	<i>No open season.</i>
<i>Unit 1A and 1B remainder - 2 goats; a State registration permit will be required for the taking of the first goat and a Federal registration permit for the taking of a second goat. The taking of kids or nannies accompanied by kids is prohibited</i>	<i>Aug. 1-Dec. 31</i>

**Is a similar issue being addressed by the Federal Subsistence Board?** No

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunity for Federally qualified subsistence users harvesting goat under State regulations. The mainland goat population in Unit 1A is considered to be stable but at lower levels when compared to Revillagigedo Island (Dorendorf 2021). Extending the season later into the winter may allow easier access to goats that get pushed to lower elevations by increasing snow depth in the mountains (Cross 2022, pers. comm.). Disturbance from hunting during January could also increase the energy expenditure of goats during their hardest time of year.

This hunt area is managed by registration permit RG001. Harvest is limited by ADF&G’s point system (i.e. 1 point for billies, 2 points for nannies) and monitored closely by a 3-day reporting requirement of successful harvest (Schumacher 2022, pers. comm.). While this hunt area is closed by emergency order if reported harvest approaches or equals the points allotted, goats could be quickly harvested during January when they may be easily accessible at lower elevations. Therefore, the 3-day reporting requirement could be shortened during January as an additional safeguard against overharvest.

Adopting this proposal would further misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on Proposal 44.

**Rationale:** This proposal would increase opportunity for Federally qualified subsistence users hunting under State regulations. Goat populations are healthy enough to support harvest. While they are protected from overharvest by registration permits and ADF&G’s point system, a shorter reporting requirement could be considered for the January season. Additionally, hunting disturbance during goats’ most physically stressful time of year may result in higher, indirect mortality.



Literature Cited

Cross, Rob. 2022. Wildlife Biologist. Personal communication, phone call. USFS. Petersburg, AK.

Dorendorf, R. R. 2021. Mountain goat management report and plan, Game Management Unit 1A: Report period 1 July 2013–30 June 2018, and plan period 1 July 2018–30 June 2023. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-20, Juneau.

Schumacher, T. 2022. Region 1 supervisor. Alaska Department of Fish and Game. Personal communication: e-mail. November 2022.

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

Lengthen the hunting season for wolves in Unit 2, to open September 1.

**Current Federal Regulations:**

**Unit 2 –Wolf Hunting**

*No limit.*

*Sept. 1-Mar. 31.*

*Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the hunter or trapper for each wolf, and all hides must be sealed within 15 days of take.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No

**Impact to Federal subsistence users/wildlife:** Adoption of this proposal would provide Federally qualified subsistence users with additional hunting opportunity to harvest wolves under State regulations on State-managed lands. It would also align State and Federal hunting seasons, reducing regulatory complexity. However, it would reduce the Federal subsistence priority as Federally qualified subsistence users would not have an opportunity to harvest wolves for three months prior to the season opening to non-Federally qualified users.

No impacts to the wolf population are expected as additional harvest during the extended hunting season is expected to be very low. However, one concern is that wolf population estimates used to determine wolf trapping season lengths under the current harvest management strategy are often not available until October. Currently, the in-season Federal manager has delegated authority to close and reopen the season, but it is not clear how ADF&G would manage this situation.

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on this proposal

**Rationale:** OSM is neutral on this proposal because although it would provide additional opportunity for Federally qualified subsistence users hunting under State regulations on State-managed lands, it would



also reduce the Federal subsistence priority for Federally qualified subsistence users. Little impact to the wolf population is expected.

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

Require wolf harvest information be reported within 48 hours of recovery and sealing within 14 days in Unit 2.

**Current Federal Regulations:**

**Unit 2 –Wolf Hunting**

*No limit.*

*Sept. 1-Mar. 31.*

*Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the hunter or trapper for each wolf, and all hides must be sealed within 15 days of take.*

**Unit 2 –Wolf Trapping**

*No limit.*

*Nov. 15-Mar. 31.*

*Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the hunter or trapper for each wolf, and all hides must be sealed within 15 days of take.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No

**Impact to Federal subsistence users/wildlife:** This proposal would continue the misalignment of Federal and State reporting requirements, increasing regulatory complexity. Reducing the sealing deadline to 14 days would give users one less day to seal a harvested wolf. Requiring harvest information to be called-in within 48 hours of harvest would add undue hardship on Federally qualified subsistence users, especially in areas that have poor phone coverage with frequent outages. There would be no direct impacts to the wolf population if this proposal was adopted, although long-term management of the population may improve.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 47 **with modification** to remove the call-in requirement and to require any wolf taken in Unit 2 to be sequentially numbered and marked with the date and location recorded by the hunter or trapper. Sealing requirements would stay the same.

**Rationale:** This modification aligns Federal and State reporting requirement for wolves in Unit 2, reducing regulatory complexity. It also decreases the reporting burden on Federally qualified subsistence



users harvesting wolves under State regulations and eliminates reporting redundancy and complexity. Importantly, this modification allows ADF&G to obtain valuable data to inform their Spatially Explicit Capture-Recapture population estimation technique.

**PROPOSAL 51 –**

**5 AAC 84.270. Furbearer trapping. 5 AAC 85.056. Hunting seasons and bag limits for wolf.**

**5 AAC 92.008. Harvest guideline levels.** Establish a percentage of the Unit 2 wolf population that can be harvested on a sustainable basis, develop a harvest quota each season, require in-season reporting, provide the harvest to the public in real time, and allow three days’ notice before closing the season by emergency order.

**NOTE:** These comments only apply to the “*Establish a percentage of the Unit 2 wolf population that can be harvested on a sustainable basis, develop a harvest quota each season*” portion of this proposal.

**Current Federal Regulations:**

**Unit 2 –Wolf Hunting**

*No limit.*

*Sept. 1-Mar. 31.*

*Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the hunter or trapper for each wolf, and all hides must be sealed within 15 days of take.*

**Unit 2 –Wolf Trapping**

*No limit.*

*Nov. 15-Mar. 31.*

*Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the hunter or trapper for each wolf, and all hides must be sealed within 15 days of take.*

**Is a similar issue being addressed by the Federal Subsistence Board? No**

**Impact to Federal subsistence users/wildlife:** Adoption of the referenced portion of this proposal would revert to the previously used Harvest guideline level (HGL) wolf management strategy for Unit 2, which did not work. Federally qualified subsistence users would not know how long a season would be open, making it impossible to plan for the upcoming season. Early season closures also created hardships for trappers who could not plan for when they needed to pull traps. Timely harvesting reporting is also discouraged, as the sooner trappers report their take, the sooner the season will be closed. Furthermore, the HGL management strategy discouraged hunters and trappers from reporting harvest at all to prevent



the season from closing early. This increases the potential for over harvest, and the harvest quota was exceeded many times in the past under the HGL management strategy.

Adopting this proposal would misalign State and Federal wolf management strategies in Unit 2, increasing regulatory complexity, and complicating management. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** this proposal.

**Rationale:** The current State management strategy for Unit 2 wolves was adopted in 2019, replacing the ineffective HGL strategy. This strategy manages harvest to maintain the population within an objective range. Establishing population objectives provides managers with a quantitative benchmark to gauge successful management, helps guide habitat management and regulatory planning, and mitigates disagreements between stakeholders over what is a sustainable wolf population (Wolf Technical Committee 2017, ADF&G 2019).

Literature Cited

ADF&G. 2019. Meeting audio. Alaska Board of Game. Southeast Region Meeting. January 11-15, 2019. Petersburg, AK. [http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/swf/2018-2019/20190111\\_janse/index.html?mediaBasePath=/Meeting%2001-14-19%20BOG%20%28Jan-18-19%209-58-54%20AM%29#](http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/swf/2018-2019/20190111_janse/index.html?mediaBasePath=/Meeting%2001-14-19%20BOG%20%28Jan-18-19%209-58-54%20AM%29#). Accessed May 2, 2019.

Wolf Technical Committee. 2017. Interagency wolf habitat management program: Recommendations for Game Management Unit 2. Management Bulletin R10-MB-822. USDA Forest Service, USDI Fish and Wildlife Service, and Alaska Department of Fish and Game.

**PROPOSAL 52**

**5 AAC 84.270. Furbearer trapping. 5 AAC 85.056. Hunting seasons and bag limits for wolf. 5 AAC 92.008. Harvest guideline levels.** Establish a harvest quota for wolves, between 20% and 35% of the estimated wolf population in Unit 2.

See comments for Proposal 51.



**Submitted by:** Craig Olson

**Community of Residence:** Kupreanof, Alaska

**Comment:**

Proposal 24 and 25

I oppose black bear hunting on the Petersburg Creek drainage.

Bow hunting results in wounded animals not killed immediately. The handbook for registered bow hunters talks about the 2 hunts. And recommends waiting to track the wounded animal for 8 hours to let it lie down and bleed out. The proposed dates of April 15 through June 30 corresponds to high use of Petersburg Creek by steelhead fishers, tourist, and recreational boaters. A wounded black bear is a real threat.

As stated in proposal 25 the black bear population in Southeast Alaska is suspected to be on the decline. As a 40 year resident of Kupreanof, Petersburg Creek is the only reliable place to view black bears. With the rest of Kupreanof Island open to hunting it seems unnecessary to open the only sanctuary for bears, which is a Congressional designated wilderness area, heavily used by the non hunting public. Setting aside a small area for bears to maintain a viable population is sound management for maintaining a huntable population elsewhere.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 24:** Oppose

**Proposal 25:** Oppose



**Submitted by:** Nicholas Orr

**Community of Residence:** Juneau

**Comment:**

Proposal #4 -- I am in support of this proposal.

Based on the harvest in Berners Bay (a 1 bear per year area) actually going down after being liberalized to 1 bear per year, there is no reason to believe that a liberalization of the brown bear bag limit is going to result in a material change in brown bear harvest.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 4:** Support

**Submitted by:** Nicholas Orr

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal #6: Support

Changing the river otter season to match the wolverine season simplifies regulations as well as provides increased opportunity for trappers. The season would align with that in Unit 9, which has river otter populations and occupies a similar latitude. Fur primeness is related to daylight, so having similar seasons for similar latitudes makes sense.



River otters are not widely harvested in Units 1-5, so while an expansion of the season has the potential to deplete localized populations, the overall population will likely see no impact.

There is some concern that river otters might be having kits during this proposed season extension, though in my experience with otter bycatch while targeting beavers, only otters in May exhibited signs of recent birth.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 6:** Support

---

**Submitted by:** Nicholas Orr

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal #7: Support

Like I said in the proposal, this would allow marten bycatch in wolverine traps to be

(legally) retained. It would also allow people who are out deer hunting to participate in marten trapping, as the early part of the season extension overlaps with the deer rut.

Marten are one of the easiest species to target, given they aren't especially trap-shy nor do they require heavy/strong traps. I'm hopeful that if the season was extended, especially in November, more people would try their hand at trapping since they would already be in the field.

From a scientific perspective, fur primeness is related to daylight hours. British Columbia's regions 6 & 7 have similar seasons to the one I have proposed and are at latitudes that mirror and even extend well south of SE Alaska. Given Canada's large share of the marten fur market, if they're utilizing dates like the ones I'm proposing, then those dates are probably producing prime fur.

I have attached a pdf showing the BC regions relative to SE Alaska as well as the BC trapping marten trapping season.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 7:** Support

---

*See attachment on the following page.*



# 2022-2024 PROVINCIAL TRAPPING SEASONS

NOTE: THE FOLLOWING OPEN SEASONS APPLY TO THE ENTIRE REGION UNLESS SPECIFIC MANAGEMENT UNITS (MUS) ARE STATED.

SPECIES/REGIONS (MUs)	SEASON DATES	SPECIES/REGIONS (MUs)	SEASON DATES
<b>BEAVER</b>		<b>RACCOON</b>	
Region 1 .....	Oct 1 - Apr 30	Regions 1, 2, 3, 4, 5, 6 (except MUs 6-12, 6-13), 7A, 7B, 8 .....	Oct 1 - Mar 31
Regions 2, 3, 4, 5, 8 .....	Oct 15 - Apr 30	MUs 6-12, 6-13 .....	Jan 1 - Dec 31
Regions 6 (except MUs 6-12, 6-13), 7A, 7B .....	Oct 1 - May 31	<b>RIVER OTTER</b>	
MUs 6-12, 6-13 .....	Jan 1 - Dec 31	Region 1 .....	Nov 15 - Mar 31
<b>BLACK BEAR</b>		MUs 2-2 to 2-5, 2-12 to 2-16 .....	Nov 15 - Feb 28
Region 5 (except MUs 5-2, 5-15) and MUs 6-3, 6-11 to 6-14 ..	Oct 15 - May 15	MUs 2-6 to 2-11, 2-17 to 2-19 and Regions 3, 4, 5 .....	Oct 15 - Apr 30
Regions 3, 4, 7B, 8, and MUs 5-2, 5-15 .....	Oct 1 - May 31	Regions 6, 7A, 7B .....	Oct 1 - May 31
Regions 6 (except MUs 6-3, 6-11 to 6-14), 7A .....	Sept 15 - May 31	Region 8 .....	Nov 1 - Apr 15
Quota = 2 black bear in one licence year		<b>SKUNK</b>	
See the "Bears" and "It's Unlawful" section for general regulations concerning bear parts.		MUs 1-14, 1-15 and Regions 2, 3, 4, 5, 6, 7A, 7B, 8 .....	Oct 15 - Feb 28
<b>BOBCAT</b>		<b>SQUIRREL</b> (douglas, northern flying, red)	
Regions 2, 3, 4, 5, 8 .....	Nov 15 - Feb 15	Regions 1, 2, 3, 4, 5, 8 .....	Nov 1 - Mar 15
See <a href="#">Compulsory Inspection &amp; Reporting requirements, page 72</a>		Regions 6 (except MUs 6-12, 6-13), 7A, 7B .....	Nov 1 - Mar 30
<b>COYOTE</b>		MUs 6-12, 6-13 .....	Jan 1 - Dec 31
Region 2 .....	Sept 10 - Jun 15	<b>WEASEL</b> (least, long-tailed, short-tailed)	
MUs 1-14, 1-15 and Regions 3, ♠4, 5, 6, 7A, ★7B, 8 .....	Oct 15 - Mar 31	Regions ♠2, 3, 4, 5, 8 .....	Nov 1 - Feb 15
♠ In MU 4-1, open season is Dec 1 - Mar 31 if using a killing snare.		Regions 6 (except MUs 6-12, 6-13), 7A, 7B .....	Nov 1 - Feb 28
★ There is no closed season for coyote in MUs 7-19 to 7-22, 7-31 to 7-36, 7-42 to 7-58 below 1100 m elevation.		♠ There is no open season for long-tailed weasel in MUs 2-3, 2-4, 2-6, 2-18 & 2-19	
<b>FISHER</b>		<b>WOLVERINE</b>	
MUs 6-19 to 6-27, and Region 7B .....	Nov 1 - Feb 15	Regions 3, 5 .....	Nov 1 - Jan 31
See <a href="#">Compulsory Inspection &amp; Reporting requirements, page 72</a>		Regions 6 (except MUs 6-3, 6-11, 6-14), 7A, 7B .....	Nov 1 - Feb 28
Fisher trapping seasons in Regions 3, 5, 7A, and portions of Region 6 have been closed.		MUs 6-3, 6-11, 6-14 .....	Nov 1 - Feb 15
<b>FOX</b>		See <a href="#">Compulsory Inspection &amp; Reporting requirements, page 72</a>	
MUs 1-14, 1-15, and Regions 2, 3, 4, 6, 7A, 7B .....	Oct 15 - Feb 28	<b>WOLF</b>	
Region 5 .....	Oct 15 - Mar 31	Region 1 .....	Sept 10 - Jun 30
<b>LYNX</b>		MUs 2-5, 2-6, 2-11 to 2-16 .....	Sept 10 - Jun 15
Regions 3, 4, 5, 7B, 8 .....	Nov 15 - Feb 15	MUs ♠3-12 to 3-20, 3-26 to 3-33, 3-34 to 3-44 .....	Oct 15 - Mar 31
Regions 6, 7A .....	Nov 1 - Feb 15	Regions * ♠4, ♠5, 6, 8 .....	Oct 15 - Mar 31
See <a href="#">Compulsory Inspection &amp; Reporting requirements, page 72</a>		Regions 7A, ★7B .....	Oct 15 - May 31
<b>MARTEN</b>		* There is no closed season for wolf below 1100 m elevation in MUs 4-2 to 4-5, 4-20 to 4-22, 4-24 to 4-26, 4-34 to 4-37, and 4-40. Restricted to the use of certified restraining traps only (see page 75) from Apr 1 - Oct 14.	
Regions 1, 2, 3, 4, 5, 8 .....	Nov 1 - Feb 15	♠ On private land ONLY, there is no closed season for wolf in MUs 3-12, 3-13, 3-17 to 3-20, 3-26 to 3-33, 3-35 to 3-42, 5-1 to 5-6, and 5-12 to 5-14. From Apr 1 - Oct 14 only certified restraining traps can be used. Private land is defined as land that is not Crown land and that government does not have a vested interest in (i.e., does not apply to Crown grazing lease).	
Regions 6, 7A, 7B (except MUs 7-49 to 7-54) .....	Nov 1 - Feb 28	♠ The use of killing snares in the Kootenay Region is limited to Dec 1 - Mar 31.	
MUs 7-49 to 7-54 .....	Nov 1 - Mar 15	★ There is no closed season for wolf in MUs 7-19 to 7-22, 7-31 to 7-36, 7-42 to 7-58 below 1100 m elevation.	
<b>MINK</b>			
Regions 1, 3, 4, 5, 7B (except MUs 7-49 to 7-54), 8 .....	Nov 1 - Feb 15		
Region 2 and MUs 6-3, 6-11, 6-14 .....	Nov 15 - Feb 15		
Regions 6 (except MUs 6-3, 6-11, 6-14), 7A .....	Nov 1 - Feb 28		
MUs 7-49 to 7-54 .....	Oct 15 - Feb 15		
<b>MUSKRAT</b>			
Regions 1, 3, 4, 5, 8 .....	Oct 15 - Apr 30		
Region 2 .....	Nov 15 - Feb 15		
Regions 6 (except MUs 6-12, 6-13), 7A, 7B .....	Oct 1 - May 31		
MUs 6-12, 6-13 .....	Jan 1 - Dec 31		

**Trappers should be aware of the restrictions described in the It's Unlawful section (pages 11-12) and the Hunting Methods and Restrictions sections (pages 12-13).**



Area jointly managed by  
Skeena Region (Parks),  
and Omineca and Peace  
Regions (Fish & Wildlife  
Management)



**Submitted by:** Nicholas Orr

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal #10 -- Oppose

This proposal purports to act as an 'olive branch to the SE Rural Advisory Committee (RAC) by establishing a clear rural priority in bag limits. However, as ADFG has pointed out, federally qualified users already have a clear through priority though an extended season as well as the federally designated hunter program.

During the last SE RAC meeting, this proposal wasn't mentioned at all as far as I can tell. If it was, it certainly didn't result in serious consideration. I think it's a reasonable conclusion to say that if this proposal was submitted as an 'olive branch' , the SE RAC ignored that gesture.

ADFG has put out a fantastic video on Youtube outlining the Unit 4 deer issue. I encourage you to view this video here: <https://www.youtube.com/watch?v=MZd9YozB8f4>

I would like to point out that the Board of Game increased the Unit 4 deer bag limit because the population is at or near carrying capacity. This has not changed. A board member made the comment that "You cannot stockpile game." This is as true now as it was then. The Board noted that raising the bag limit would eliminate illegality in the limited situations where federally qualified users are harvesting deer 5 and 6 on the beach (state land) as the state did not allow for harvest of deer 5 and 6 previously. The board noted that most non-federally qualified hunters (1) do not harvest more than 4 deer and (2) are not hunting anywhere near federally qualified hunters (i.e the vast majority of Juneau hunting effort is in the area immediately surrounding Juneau). That also has not changed.

I urge you to oppose this proposal.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 10:** Oppose

---

**Submitted by:** Nicholas Orr

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal #11 -- Oppose

This proposal suggests that because we have had a limit of 4 deer for a long time that we should revert back to having a limit of 4 deer. The rationale behind this proposal is "Because we've always done it that way." That is the worst rationale to do anything.

I would point out that an increased bag limit is actually a benefit to the overall deer population in heavy snow years. Years where heavy snow forces deer to the beach concentrates deer numbers in limited habitat. Reducing deer numbers, especially bucks (likely to have high mortality figures), in those years allows the remaining deer to have less competition for available browse and increases their chances at surviving the winter.

I would like to point out that the Board of Game increased the Unit 4 deer bag limit because the population is at or near carrying capacity. This has not changed. A board member made the comment that "You cannot stockpile game." This is as true now as it was then. The Board noted that raising the bag limit would eliminate

illegality in the limited situations where federally qualified users are harvesting deer 5 and 6 on the beach (state land) as the state did not allow for harvest of deer 5 and 6 previously. The board noted that most non-federally qualified hunters (1) do not harvest more than 4 deer and (2) are not hunting anywhere near federally qualified hunters (i.e the vast majority of Juneau hunting effort is in the area immediately surrounding Juneau). That also has not changed.

This proposal's author also states that 4 deer is sufficient for one person. I know individuals that can certainly eat 4 deer and I know people who would struggle to eat one. That statement is subjective and not a rationale to make any decision.

I urge you to oppose this proposal.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 11:** Oppose

**Proposal 21:** Oppose

**Proposal 22:**

**Submitted by:** Nicholas Orr

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal 36: Oppose

The author of this proposal wants to have higher grouse populations in easily accessible areas for beginning hunters. The problem with this is that easily accessible areas always receive a lot of hunting pressure, resulting in depressed game populations in those spots. This is true with every game animal across the state. ADFG has stated as much, saying that if you wanted to increase potential bird availability, you'd have to decrease the limit to 1 bird. And even then, the amount of birds available would depend on weather during the previous year's hatching season.

I'm not sure that even a limit of one bird would achieve what this proposal's author would like. I used to be an avid grouse hunter, shooting upwards of 20 birds in years with favorable weather (ie limited snow). I wasn't going out and shooting 5 birds in one outing, but rather I went almost every day of the season (approx April 1 - May 15) and got 1 or 2 birds each time. And I would run into other hunters pretty regularly. So to think that reducing the bag limit is going to increase the availability of birds for new hunters goes against common sense as well as the science based recommendation of ADFG.

There were days that I got 5 birds; these days I logged a lot of foot miles and traveled a long ways off the road system. Reducing the bag limit would essentially target hunters who are putting in a lot of effort to reach areas that aren't easily accessible. I think it's important to consider that this proposal looks to limit the bag limit over an enormous area, the vast majority of which does not qualify as "easily accessible"

The proposal has a number of red herring arguments that need to be addressed: (1) there isn't a huge number of skiers targeting grouse. If you drew a Venn diagram with skiers and hunters, the overlap would likely be pretty small. Snowmachines can only really access grouse on Douglas Island and a limited area on the mainland. Any birds that skiers or snowmachiners harvest are not birds that a person on foot is going to be able to access! Furthermore, snowmachiners are not able to target birds consistently. They are completely shut out in years with low snow (2) Hunting shows / social media may be highlighting grouse hunting, but hunting numbers are still going down. (3) Sooty grouse hunting is not a replacement for spring king fishing. Many people do not find a 6-8 hour bushwhacking hike with an elevation gain up to 2500ft to be a similar replacement for a nice day on the water.



**PC116**

I will grant that the author of this proposal was very persuasive at the Juneau Douglas Advisory Committee meeting. Members were quite concerned about snow machine harvest and increasing the availability of birds in easily accessible areas despite common sense and ADFG telling them that the data doesn't support this proposal.

I urge you not to support this proposal. It covers an overly large area and will not accomplish its stated intent.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 36:** Oppose

---

**Submitted by:** Nicholas Orr

**Community of Residence:** Juneau, Alaska



**PC116**

**Comment:**

Proposal #37: Oppose

The author of this proposal gives the impression that ptarmigan along the road system are in danger of being overharvested because the population isn't monitored by ADFG. I have run into flocks of 10-15 birds and have heard second hand about hunters seeing many more birds than 10-15. Sometimes you don't run into birds - that's hunting. My accounts and the accounts of others are consistent with ADFG saying that bird populations are driven more by weather during nesting seasons.

The 20 bird limit does seem like a high number; in years with low birds numbers, it doesn't matter because the birds are scarce to begin with. In years with high bird numbers, it still doesn't matter because shooting 20 is rare given the terrain in the alpine. I think a number of members of the Juneau Douglas Advisory Committee (JDAC) were under the impression that ptarmigan will stand around while you harvest them. That may be true for a few birds, but eventually the flock will relocate, often crossing several drainages and gullies in the process. You may be able to see where they went, but good luck getting back within shooting range in a reasonable time period.

There was also concern among JDAC members that hunters on snowmachines would be able to harvest a lot of birds by following flocks once they are located. This may be possible in other areas of the state, but not here. Snowmachiners are limited on the mainland to one area, which isn't very good ptarmigan habitat. On Douglas, there just isn't a lot of ptarmigan habitat. Skiers can certainly reach good habitat, but most skiers I know are more interested in the descent down the mountain rather than maximizing their harvest. Plus, skiers face the same challenges as other hunters once the birds decide to relocate.

To summarize: ADFG says the population fluctuates independent of hunting pressure and despite claims to the contrary, hunting pressure is minimal due to the effort and lack of consistent good weather required to reach the alpine. The area under consideration is huge and the vast majority of it receives no ptarmigan hunting pressure. Complicated regulations is a frequent complaint I hear from hunters and prospective hunters. The last thing Juneau needs is more regulations, especially unnecessary ones. Please oppose this proposal.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 37:** Oppose

---

**Submitted by:** Nicholas Orr



**PC116**

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal 41: Support

Please remove the Douglas Island Management plan. It makes no sense to have a wolf sanctuary on Douglas when the wolves are part of an overall population that transits back and forth between the Juneau area mainland and Douglas Island. Typically, a sanctuary is established to protect a vulnerable population or provide wildlife viewing. The Juneau area wolf population is robust; even after the wolves were 'wiped out' back in 2002, they were never absent from the island (I remember hearing wolves howling in 2006). As far as wildlife viewing is concerned, a substantial portion of Douglas Island has limited road access and wolves are not a consistently viewable species in SE Alaska.

I would also like to point out that Douglas Island receives the most deer hunting pressure in the Juneau area. A good portion of these hunters hunt Douglas simply because they have no other alternative -- they cannot afford a boat to get over to Admiralty. I think it's unfair to have a wolf sanctuary that primarily impacts people of lower economic status.

Please support the removal of the Douglas Island Management plan for wolves. It makes no biological sense, it makes no common sense (given wolves are not consistently viewable) and it disproportionately impacts lower income Juneau hunters. Furthermore, it discourages trappers from setting the amount of traps needed to catch wolves given they may have to pull all their gear if the limit is reached.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 41:** Support

---



**PC117**

**Submitted by:** Corey ostrander

**Community of Residence:** Wrangell, Ak.

**Comment:**

It would be nice to have the opportunity for an elk hunt on zerambo. To would also be nice if there was a limited draw for doe around the wrangell and Petersburg area.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

**Proposal 17:** Support

---



**Submitted by:** Steve Ott

**Community of Residence:** Juneau Alaska

**Comment:**

I've filed out the survey conveying my opinion on proposed changes.

Regarding proposals 28 & 29:

Increasing Goat accessibility in the Juneau area by expanding RG014 will allow for greater hunter opportunity and distribution of hunter pressure. Due to the physicality and difficulty of archery goat hunting, it's unlikely to increase hunter numbers in this area. As it stands, there are large low impact areas that have been closed to hunting for as long as I can remember for no good reason. Expand RG014!

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 1:** Oppose  
**Proposal 2:** Oppose  
**Proposal 3:** Support  
**Proposal 4:** Support  
**Proposal 10:** Oppose  
**Proposal 11:** Oppose  
**Proposal 12:** Support  
**Proposal 13:** Support  
**Proposal 14:** Support

**Proposal 21:** Oppose  
**Proposal 28:** Support  
**Proposal 29:** Support  
**Proposal 30:** Support  
**Proposal 31:** Support  
**Proposal 34:** Support  
**Proposal 35:** Support  
**Proposal 36:** Support  
**Proposal 37:** Support

**Proposal 38:** Support  
**Proposal 39:** Support  
**Proposal 40:** Support  
**Proposal 41:** Support  
**Proposal 42:** Support  
**Proposal 43:** Support  
**Proposal 44:** Support  
**Proposal 45:** Support  
**Proposal 46:** Support

**Proposal 47:** Oppose  
**Proposal 48:** Oppose  
**Proposal 49:** Oppose  
**Proposal 50:** Oppose  
**Proposal 51:** Oppose  
**Proposal 52:** Oppose  
**Proposal 53:** Oppose  
**Proposal 54:** Oppose



**Submitted by:** Aaron Overton

**Community of Residence:** Juneau Alaska

**Comment:**

No hunting in prime wintering habitats for mountain goats that is so easily accessible. That area is used by many goat viewers that don't hunt.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 28:** Oppose



**Submitted by:** Exor Padro

**Community of Residence:** Juneau,AK

**Comment:**

Proposition #32, Exor Padro

I'm in support of this proposition. There is no downside to it. On the contrary, this proposition has the potential to dramatically impact the goat population in a positive matter as the years accumulate.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 32:** Support





**Submitted by:** Bruce Parker

**Community of Residence:** SITKA

**Comment:**

Please find the proposals I have interest in one way or the other with support or oppose.

I do not support proposals 1,2,3,4,13 and 14.

I do not see prop[osal # 201 listed here, but I do support it and getting a Sea Otter season and harvest in Place.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 1:** Oppose

**Proposal 3:** Oppose

**Proposal 13:** Oppose

**Proposal 2:** Oppose

**Proposal 4:** Oppose

**Proposal 14:** Oppose



**Submitted by:** Dustin Phillips

**Community of Residence:** Wrangell, Alaska

**Comment:**

Zarembo island has a very healthy population of animals to allow a reasonable season for locals to harvest this very unique species in south east. I have personally witnessed lots and lots of elk on the Rambo island on the beach is it on the main line logging roads. I believe it properly managed with limited animals taken per year that this can be a very viable hunt that can grow in time. And regards, I hope this comments reaches you well

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 17:** Support



**Submitted by:** Richard Phillips

**Community of Residence:** Wrangell,Alaska

**Comment:**

The amount of activity seen by people working, hunting and transiting zarembo island snow pass and surrounding areas more than constitutes a draw tag in this island, if this many bulls are being seen constantly in the open then their is certainly plenty that don't get seen by humans.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 17:** Support



**Submitted by:** John Plett

**Community of Residence:** Juneau, Ak

**Comment:**

Prop 41) I agree, the wolf population on Douglas island has been increasing, and the deer population has suffered. I as well as many Juneau residents rely on deer as a food source, and the deer are getting harder to find every year. I have come across wolf packs on north Douglas at least once per season the last 3 years, and the number of wolf kill sights I have found while grouse hunting in the spring, as well as deer hunting in the fall, has increased greatly since 2018.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 1:</b> Support	<b>Proposal 13:</b> Support	<b>Proposal 29:</b> Support	<b>Proposal 45:</b>
<b>Proposal 2:</b> Support	<b>Proposal 14:</b> Support	<b>Proposal 30:</b> Support	<b>Proposal 46:</b>
<b>Proposal 3:</b> Oppose	<b>Proposal 17:</b> Support	<b>Proposal 31:</b> Support	<b>Proposal 47:</b>
<b>Proposal 4:</b> Support	<b>Proposal 18:</b> Support	<b>Proposal 32:</b> Support	<b>Proposal 48:</b>
<b>Proposal 5:</b> Support	<b>Proposal 19:</b> Support	<b>Proposal 34:</b> Support	<b>Proposal 49:</b>
<b>Proposal 6:</b> Support	<b>Proposal 20:</b> Support	<b>Proposal 35:</b> Support	<b>Proposal 50:</b>
<b>Proposal 7:</b> Support	<b>Proposal 21:</b> Oppose	<b>Proposal 36:</b> Support	<b>Proposal 51:</b>
<b>Proposal 8:</b> Support	<b>Proposal 24:</b> Support	<b>Proposal 37:</b> Support	<b>Proposal 52:</b>
<b>Proposal 9:</b> Support	<b>Proposal 25:</b> Support with	<b>Proposal 38:</b> Support	<b>Proposal 53:</b>
<b>Proposal 10:</b> Oppose	Amendment	<b>Proposal 39:</b> Support	<b>Proposal 54:</b>
<b>Proposal 11:</b> Oppose	<b>Proposal 26:</b> Support	<b>Proposal 40:</b> Support	
<b>Proposal 12:</b> Support	<b>Proposal 28:</b> Support	<b>Proposal 41:</b> Support	



**Submitted by:** Joshua Plis

**Community of Residence:** Juneau, Alaska

**Comment:**

Oppose 28 no hunting in goat wintering grounds.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 28:</b> Oppose	<b>Proposal 29:</b> Support
----------------------------	-----------------------------



**Submitted by:** Aaron Powell

**Community of Residence:** Wrangell, AK

**Comment:**

I strongly support a opportunity for a chance to harvest a elk on Zarembo Island. The only thing I would like to see different is having the season September 15th - October 15th. It would be nice to be able to hunt Elk during the rut just like we do moose and deer.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 17:</b> Support with Amendment
---



**Submitted by:** Ed Rauterkus

**Community of Residence:** Juneau Ak

**Comment:**

I vote no change on proposal numbers 10. 11. 36. 37. 41. People that are not from Alaska should have nothing to say about our fish and game rules. We don't have anything to say about rules in the states they live in. [REDACTED]

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 10:** Oppose  
**Proposal 11:** Oppose

**Proposal 21:** Oppose  
**Proposal 36:** Oppose

**Proposal 37:** Oppose  
**Proposal 41:** Oppose



**Submitted by:** Ryan Reeves

**Community of Residence:** Wrangell,AK

**Comment:**

Proposal 27

Regarding requirement to move traps 100 yards from a drivable surface, I strongly oppose this recommendation.

During trapping season most of the logging roads are inaccessible by truck, and is typically accessed by snowmobile or wheeler. With that being said, to require 100yard minimum from road is bogging down trappers access and is unnecessary. Trappers are for the most part targeting wolves to help manage the the wolf population and help the deer population. Wolf traps are heavy, if this proposal went through it would require the trapper to pack their traps, at about 10 pounds each with a chain and drag system, This would discourage people from trapping and would be unreasonable. The alternative is to trap by boat witch is expensive and are subject to bad weather, and is limited to people with boats. I feel that driving past the pavement and posted trap signs is more than enough warning to caution people and prevent trapper/human conflict.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 27:** Oppose



**unapologetically FOR ALASKAN RESIDENTS**

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436  
email [info@residenthuntersofalaska.org](mailto:info@residenthuntersofalaska.org) web [www.residenthuntersofalaska.org](http://www.residenthuntersofalaska.org)

January 5, 2023

**Comments to Alaska Board of Game  
Region I Southeast Meeting  
January 20–24, 2023**

Proposals we support: 2, 30, 31, 35, 42, 46,

Proposals we oppose: 1, 10, 11, 27, 47-54

**Proposal 1- 5AAC 92.003 Hunter education and orientation requirements**

**OPPOSE**

RHAK is involved in hunter education efforts because hunter education and orientation is important for the reasons outlined in this proposal. However, mandating these requirements over Units 1-5 will end up having the effect of disenfranchising many subsistence hunters in outlying areas who are unable to travel and take the required hunter education and orientation course before being allowed to hunt.

One compromise may be to require all hunters in Units 1-5 who have not completed a hunter education and orientation course to take and pass the online course only, which we would support.

---

**Proposals 10 & 11 - 5AAC 85.030 Hunting seasons and bag limits for deer**

**OPPOSE**

Both of these proposals seek to decrease the bag limit for deer in Unit 4 by non-federally qualified users (NFQU) from 6 to 4 deer, using the rationale that if the bag limit for NFQU is not decreased we will see evermore federal proposals to close deer hunting on federal lands by NFQU.

This is the exact opposite approach the state should be taking, and is consistent with past federal proposals to limit NFQU that are not at all based on any conservation concerns for deer populations.

The deer population in Unit 4 is abundant and there is absolutely no reason to decrease the bag limit for NFQU.



**Proposal 31 – 5AAC 85.040 Hunting seasons and bag limits for goat**

**SUPPORT**

**This is a RHAK proposal and there was no intention with this proposal to eliminate any nonresident goat hunting opportunity, as stated in the Department comments.**

The intent of this proposal is to lengthen the resident RG 015 goat season by one month by starting the season on August 1<sup>st</sup> instead of September 1<sup>st</sup>. The nonresident RG 015 goat season remains the same.

**Unit 1C Chilkat Peninsula southern portion drainages of the Chilkat Range south of the south bank of the Endicott River**

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

**Resident only RG 015 (or new RG XXX) Aug 1 – Nov 30**

**Nonresident RG 015 Sept 1 – Nov 30**

Goat harvests are very low in this area and survey results show an increasing population. We would like resident goat hunters to be afforded more hunting opportunity during August when the weather allows for better, more reliable access.

The Guideline Harvest Level (GHL) for this population allows for up to 18 goat points, which would be 18 billies. We don't expect that much of an increase in goat harvest with a resident-only earlier season start and there are no conservation concerns as the season would still be closed by emergency order if harvest exceeded 18 goat points.

We recommended also imposing a requirement that all hunters participating in this hunt watch and pass the ADF&G goat gender identification quiz, because we don't want the taking of nannies to impact opportunity. However, we support this proposal with or without that requirement.

---

**Proposal 34 – 5AAC 85.020 Hunting seasons and bag limits for brown bear**

**Withdraw based on Department comments**

This is a RHAK proposal. After reading the Department's comments, it appears that current harvest levels of brown bears on the Chilkat Peninsula exceed the recommended harvest. However, the Department does not oppose this proposal asking for more brown bear hunting opportunities, and is neutral on potentially increasing brown bear harvests.

The Department alludes that because this is an allocative proposal, they must remain neutral, which doesn't make any sense if the Department has conservation concerns for the brown bear population in this area if additional harvest opportunities are allowed. Perhaps it's time to revisit the Department policy on neutrality on all allocative proposals.



Thank you to Board of Game members for your service, and as always thank you to Board Support and Agency staff!

Resident Hunters of Alaska (RHAK)

[www.residenthuntersofalaska.org](http://www.residenthuntersofalaska.org)



**Submitted by:** Beverly Richardson

**Community of Residence:** Petersburg AK

**Comment:**

I urged you to Support 45,47,48,49,50,52,53. And 54.

And I urge you to oppose 24, 25, 46 and 16.

Comments on additional form

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 16:** Oppose

**Proposal 46:** Oppose

**Proposal 50:** Support

**Proposal 54:** Support

**Proposal 24:** Oppose

**Proposal 47:** Support

**Proposal 51:** Support

**Proposal 25:** Oppose

**Proposal 48:** Support

**Proposal 52:** Support

**Proposal 45:** Support

**Proposal 49:** Support

**Proposal 53:** Support

**Submitted by:** Beverly Richardson

**Community of Residence:** Petersburg

**Comment:**

Proposal 24. I am in opposition to Allowing black bear to be taken by bow and arrow in Petersburg Creek Drainage.

I oppose this proposal. Petersburg Creek watershed has been closed to the taking of black bear since the 1970's. It is a highly used recreational area for the peoples of Petersburg and tourists alike. One of the first and finest events is to go up the creek especially the spring or other times throughout the year and watch the bears come out on the flats. Further, this proposal would occur during and conflict with the renowned steelhead fishing season in this watershed. There is no purpose or need for this proposal. This is only a very small portion of Area 3 and there are numerous opportunities elsewhere.

Proposal 24 I am in opposition to Allowing black bear to be taken in Petersburg Creek Drainage.

I oppose this proposal. Petersburg Creek watershed has been closed to the taking of black bear since the 1970's. It is a highly used recreational area for the peoples of Petersburg and tourists alike. One of the first and finest events is to go up the creek especially the spring or other times throughout the year and watch the bears come out on the flats. Further, this proposal would occur during and conflict with the renowned steelhead fishing season in this watershed. There is no purpose or need for this proposal. This is only a very small portion of Area 3 and there are numerous opportunities elsewhere.

Proposal 16.I am in opposition to this proposal to extend the bow season for deer on Mitkof Island.

I am in opposition to the extension of the bow season on. Mitkof Island by changing the opening from October 1 to August 1. This area often comes close to areas of recreation where local folks and their dogs wander through th woods. This is especially true of berry picking time. This could easily result in conflicts. And would create undue angst with berry pickers and others wandering through the forest near the roadsides.. There is no need to replace the long established use of the forest for berry picking by potential bow hunters. Please do not extend this season



**Submitted by:** Tavis Rogers

**Community of Residence:** Oak Creek, CO

**Comment:**

I am in support of the proposals that would provide additional low impact archery hunting opportunities outlined in Proposals 16, 24, 29, and 30.

I am in opposition of cutting the archery season at Etolin Island in half and adding rifle hunts in that time right on top of the peak of the elk rut as there are already two any weapon hunts in the month of October that yield over 50% more harvest than the archery hunt. This proposal would take away from the lower impact archery season while potentially having a negative effect on the elk herd

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 16:** Support

**Proposal 24:** Support

**Proposal 30:** Support

**Proposal 19:** Support with

**Proposal 29:** Support



**Submitted by:** John Roseland

**Community of Residence:** Thorne Bay, Alaska

**Comment:**

I am opposed to proposal 19 for the following:

- 1). There are so few archery only seasons in Alaska that I really hate to see one cut in half.
- 2). In my personal observations, mainly on the west side of Etolin, Onslow and Stone Islands, the population has decreased over the last several years.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 19:** Oppose



**Submitted by:** Rosey Roseland

**Community of Residence:** Thorne Bay, Alaska

**Comment:**

Proposal 45: Oppose. Stock piling hundreds of wolves in an area goes against any sound big game management where animals are harvested for a food resource.

Proposal 46: For. We need to harvest more Wolves on Prince of Wales. They are having a terrible impact on the Deer and Beaver populations of the island.

Proposal 49: Opposed.

Proposal 50: Oppose. Alaska Wildlife Alliance is trying to close Wolf season any way they can.

Proposal 51: Opposed

Proposal 52: Opposed



Proposal 53: Opposed. Where is the actual proof that the unreported harvest is 35 to 50% ?

Proposal 54: Oppose. The group the Alaska Wildlife Alliance seems like a radical group to me with this outrageous proposal.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 1:** Support  
**Proposal 2:** Support  
**Proposal 3:** Oppose  
**Proposal 4:** Support  
**Proposal 6:** Support  
**Proposal 7:** Oppose  
**Proposal 8:** Oppose  
**Proposal 9:** Support

**Proposal 13:** Support  
**Proposal 14:** Support  
**Proposal 17:** Support  
**Proposal 18:** Oppose  
**Proposal 19:** Oppose  
**Proposal 20:** Oppose  
**Proposal 23:** Support  
**Proposal 24:** Support

**Proposal 25:** Support  
**Proposal 27:** Support  
**Proposal 33:** Support  
**Proposal 42:** Oppose  
**Proposal 43:** Oppose  
**Proposal 44:** Support  
**Proposal 45:** Oppose  
**Proposal 46:** Support

**Proposal 47:** Oppose  
**Proposal 48:** Oppose  
**Proposal 49:** Oppose  
**Proposal 50:** Oppose  
**Proposal 51:** Oppose  
**Proposal 52:** Oppose  
**Proposal 53:** Oppose  
**Proposal 54:** Oppose



**PC134**

**Submitted by:** Jesse Ross

**Community of Residence:** JUNEAU, Alaska

**Comment:**

Jesse Ross, Alaska Trappers Assoc, Juneau Advisory committee, trapper seat

Juneau resident and avid sportsman since 1996

Prop 4, I support this bc it falls in line with the ADFG mission. Brown bears need to be managed in SE like they are in the rest of the state. No population concern, big apex predators need managed here in SE just like they are statewide.

Prop 6, I support this, otter here in SE use same areas as beaver. many states much further south have otter season opening in Nov. Fur primeness is not an issue

otter are plentiful in SE, procreate fast, and are an underutilized fur bearer.

Prop 7, 8, 9 I support this, SE has the shortest season statewide...WHY?? not a species of concern. losing 75 days of wolverine season??? why

Prop 10 I do not support this, its bogus and goes against science and adfg goals and the mission. Just say, NO to the feds managing Alaska

Prop 11 I oppose, not needed Proposal 12, 13, 14 I support , brown bears in SE need to managed like the rest of the state...PERIOD...there are too many. despite what the Adfg chilkat valley haines survey indicates,that model is inaccurate and cannot be applied to the vast different regions of SE alaska...nowhere else in the state do the biologists do a small sample in a road access area and apply it generally to vastly different regions. i

Pro 27 I oppose, trappers need to police their own here, small local issue not needing a proposal

Prop 30 , 31, 32 33 34 I support, predators need managed, goat populations will go up...predator prey relationship

Prop 36 37 I oppose, not needed not a concern, no science supports these

proposal 38, 39I support, as does the AC

Prop 40 I support as the alternative amendment, well written proposal

Prop 41 I support fully, I have actively trapped and monitored the wolf activity on the island these last years, why do we make certain areas of the state wolf havens, and let them decimate the deer, there is no science here. deer have taken a hard hit and this plan is 20 yrs old, time to update Proposal 43 44 I support, the Ac here has done some great work. good science based

proposals 45,47 thru 54 I oppose these l. If this group, AWA was really an ally of wildlife they would seek to help Adfg in population studies and put their money where their mouth is. AWA does not have the same mission as ADFG. When i see a fellow trapper pull into a bay on southern POW and trap 9 wolves in one check in the short 30 day season, you know the wolf population needs managed. Wolves are apex predators and prolific breeders, the trapping season needs to be atleast 90 days. they are survivors, never ever in the history of Alaska have wolves been endangered. one cannot trap or hunt them to extinction on a remote island such as POW. its only in line with ADFG mission and policy to manage for all use groups, which includes hunters and locals who rely on deer. The deer population has not faired well since the wolf season has by messed with,awa is anti trapping

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 1:</b> Support	<b>Proposal 13:</b> Support	<b>Proposal 37:</b> Oppose	<b>Proposal 47:</b> Oppose
<b>Proposal 2:</b> Support	<b>Proposal 14:</b> Support	<b>Proposal 38:</b> Support	<b>Proposal 48:</b> Oppose
<b>Proposal 3:</b> Support	<b>Proposal 27:</b> Oppose	<b>Proposal 39:</b> Support	<b>Proposal 49:</b> Oppose
<b>Proposal 4:</b> Support with Amendment	<b>Proposal 28:</b> Oppose	<b>Proposal 40:</b> Support with Amendment	<b>Proposal 50:</b> Oppose
<b>Proposal 5:</b> Oppose	<b>Proposal 29:</b> Oppose	<b>Proposal 41:</b> Support	<b>Proposal 51:</b> Oppose
<b>Proposal 6:</b> Support	<b>Proposal 30:</b> Support	<b>Proposal 42:</b> Support	<b>Proposal 52:</b> Oppose
<b>Proposal 7:</b> Support	<b>Proposal 31:</b> Support	<b>Proposal 43:</b> Support	<b>Proposal 53:</b> Oppose
<b>Proposal 8:</b> Support	<b>Proposal 32:</b> Support	<b>Proposal 44:</b> Support	<b>Proposal 54:</b> Oppose
<b>Proposal 9:</b> Support	<b>Proposal 34:</b> Support	<b>Proposal 45:</b> Oppose	
<b>Proposal 12:</b> Support	<b>Proposal 35:</b> Support	<b>Proposal 46:</b> Support	
	<b>Proposal 36:</b> Oppose		



**Submitted by:** Blake Rothschild

**Community of Residence:** Minot, ND

**Comment:**

I am in support of proposal 32. I did a small research project for my masters on the goat populations in 1D. Simply put they are extremely fragile for various reasons. The continued indiscriminate take of goats especially Nannie’s has the potential to lead to a sharp decline. Allowing the take of Nannies with the caveat that you can’t hunt goats in 1D is a great change and one that puts the onus back on the hunter.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 28:</b> Oppose	<b>Proposal 32:</b> Support	<b>Proposal 37:</b> Support	<b>Proposal 41:</b> Support
<b>Proposal 29:</b> Oppose	<b>Proposal 34:</b> Oppose	<b>Proposal 38:</b> Support	
<b>Proposal 30:</b> Oppose	<b>Proposal 35:</b> Support	<b>Proposal 39:</b> Support	
<b>Proposal 31:</b> Oppose	<b>Proposal 36:</b> Support	<b>Proposal 40:</b> Support	



**Submitted by:** Blake Rothschild

**Community of Residence:** Minot, ND

**Comment:**

I'm in support of proposal 35. What's the reason behind closing bear baiting down 15 days early yet you can still hunt in the unit. From a standardization standpoint this proposal makes perfect sense as it would align bear baiting and the end of the calendar year regulatory bear hunting season.



**Submitted by:** Mark Rowenhorst

**Community of Residence:** Fairbanks, AK

**Comment:**

Proposal 32 - Support

Biological studies indicate that mountain goat populations are severely impacted when harvest of nannies occurs. Mountain goat populations in Unit 1D are very fragile and hunting opportunity is already very limited. When nanny harvest occurs there is both immediate and long term negative impacts on hunting opportunity due to decreased harvest quotas and a chain reaction of loss of goats in the population going forward. Harvest of nannies needs to be stopped to ensure maximum hunting opportunity.

Proposal 4 - Opposed

The way this proposal is written it includes Unit 1D, which currently has very low annual brown bear harvest quotas following extreme hunter and DLP-caused mortality in 2020. It would not be prudent to increase brown bear hunting opportunity or participation in Unit 1D until Department biologists confirm the population in the Chilkat Valley can withstand increased harvest.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 1:** Support  
**Proposal 2:** Support

**Proposal 4:** Oppose  
**Proposal 18:** Support

**Proposal 32:** Support



**Submitted by:** Katherine Russell

**Community of Residence:** Juneau, AK

**Comment:**

I oppose proposals 36 and 37. ADFG has done the scientific work to create population estimates, and regulations should be based on informed science. The ADFG is opposed to the reduction in all of these opportunities because there are no conservation concerns for these species in these areas; because there is no science to support these proposals, I am opposed.

On a personal note, I am a new hunter and live in and hunt near Juneau on LÍngít Aaní. I started hunting in 2022. I have seen about 10 sooty grouse from road system accessible areas in the past 6 months when I have just been out casually, not even looking for grouse. I have as a new, young, female hunter been able to harvest sooty grouse while hunting and do not think a decreased bag limit is warranted unless there is science to justify

this need. The claim that this proposal will help beginner hunters is not necessarily true, and is not true in my case. The first weekend of December 2022 I estimate I saw ~100 ptarmigan, many many small flocks and a few large flocks while ptarmigan hunting in a Juneau road system drainage. I was able to harvest multiple ptarmigan as a new, young, female hunter and do not think a decreased bag limit is warranted unless there is science to justify this need. Between August and December of 2022 I estimate I have seen maybe ~200 more ptarmigan or more on ridgelines while hiking and running in the alpine off the Juneau road system, almost always above 2500 ft. I am supportive of strong science to inform regulations and local residents being able to harvest and live sustainability off the land. I support more research as needed, particularly if ptarmigan populations are truly lacking in monitoring.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 5:** Oppose  
**Proposal 10:** Oppose

**Proposal 11:** Oppose  
**Proposal 21:** Oppose

**Proposal 36:** Oppose  
**Proposal 37:** Oppose

---



**PC138**

**Submitted by:** John Ryan

**Community of Residence:** Hollis, AK

**Comment:**

Proposal 45: I do not support this. ADF&G no longer considers the population of the GMU 2 wolf as a concern due to low numbers. The now only hold a reduced wolf harvest season because of inbreeding concerns.

---

**Submitted by:** John Ryan

**Community of Residence:** Hollis, AK

**Comment:**

Proposal 46: I do not support this. ADF&G has continually reduced the GMU 2 wolf season, and this proposal would only hurt the trappers with a reduced season due to early season hunters. Most residents of POW feel the wolf season should open later with a December 1st trapping season start which the BOG will see a proposal on during the next board cycle unless they care to address it during the January 2023 meeting.

---

**Submitted by:** John Ryan

**Community of Residence:** Hollis, AK

**Comment:**

Proposals 47 - 54: I do not support any of these proposals. The Alaska Wildlife Alliance is a special interest organization who routinely partners up with Greenpeace, Center for Biological Diversity, and other special interest groups who strive for preservation of natural resources and total protection of animal species. AWA itself claims to be for scientifically sound & humane wildlife management. All of their proposals that they submitted set the bar very high to have a wolf harvest on POW. When reading through their proposals, they paint the picture that half of the wolves on POW are killed illegally, ADF&G doesn't know what they are doing, and the POW wolf needs to be protected instead of managed.

The reality is ADF&G needs to follow their wolf management plan and allow for the wolf population to be managed. As an experienced trapper, there is no way trappers and hunter want to kill every wolf on POW. And

there is no way you could kill every wolf on POW. They are extremely smart. They figure trappers out. They get leery of an area after other pack members end up being trapped in that area. And there is no way to really know how many wolves are actually out there until you start to trap them. I can only use the 2019 GMU 2 wolf trapping season as a decent estimate of the Hollis area. With months of trail camera work in my trap locations and an 8 week long season, I was able to harvest up to 20% of a wolf pack in three different locations. The trappers talked amongst each other to make sure every wolf was accounted for and legally harvested. All the other years, which had a maximum of a month-long season, the harvest rates of the wolf packs were very minimal. I continue to invite members of ADF&G staff to go along to check my wolf trap line to hopefully share knowledge with them. I would extend the invite to AWA however they are not located anywhere near GMU 2.

I'm asking the BOG not to take any action of proposals 47 through 54. Thank You

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 47:** Oppose  
**Proposal 48:** Oppose

**Proposal 49:** Oppose  
**Proposal 50:** Oppose

**Proposal 51:** Oppose  
**Proposal 52:** Oppose

**Proposal 53:** Oppose  
**Proposal 54:** Oppose

---

**Submitted by:** John Ryan

**Community of Residence:** Hollis, AK

**Comment:**

Poposal 201: Please create a sea otter management plan under 5AAC. ADF&G continues to refuse to allow this proposal to be reviewed by the board. They state a sea otter management plan is outside their jurisdiction. Meanwhile the SE Alaska sea otter population continues to be managed by no management. The out-of-control population is hurting the resources of Alaska. If Alaska did implement a management plan for sea otters which included harvest, the federal government has already made it clear that they will not prosecute federal regulations if state regulations allow. If anything, if a state management plan is created, the federal government may review and change their regulations, which may allow for state harvest of sea otters. I'm asking the BOG at the very minimum to please consider adding a state sea otter management plan under 5AAC even if it states at this time that the plan will follow federal regulations for the harvest of sea otters in SE Alaska. Over time, the BOG can continue to develop the regulations which will ultimately result into a state harvest season of sea otters in SE Alaska.

---

**Submitted by:** John Ryan

**Community of Residence:** Hollis, AK

**Comment:**

Proposal 202: I support for the BOG to set a wolf hunting and trapping season for GMU 2 without the ability of ADF&G leaders to shorten it due to special interest groups.

Since ADF&G changed their population estimate model for POW to a DNA hair board study, the hunters and trappers have suffered with short and un-predictable seasons. In 2019, the new tier-based season length was set and implemented. ADF&G allowed for the longest but reduced 8 week season which resulted in 167 legally (2 illegally) harvested wolves out of the 174-wolf population estimate. ADF&G issues a poorly written population harvest news release in 2020 saying the trappers came out in record numbers and did exactly as ADF&G told them not to at the fall 2019 GMU 2 wolf meeting. ADF&G placed blame on the hunters and trappers for harvesting all but 5 wolves on POW. This news release was picked up by every news outlet and caught

immediate attention of special interest groups who responded by filing another petition to list the SE Alaska as federally protected. ADF&G had a conservative wolf harvest in 2020 even though their population estimate was over 300+ animals. The conservative season was due to population concerns. The population estimate grew again in 2021 and then again in 2022. ADF&G held conservative harvest seasons both of those years but moved the goal post. The new conservative harvest seasons were due to "inbreeding concerns", and no longer due to a low population level. The wolf population on POW has been out of control since 2015 and has decimated the deer and beaver populations. The wolves are running out of their preferred food and now feasting on black bears according to scat studies. I'm sure you have already heard it numerous times over concerning the wolves in GMU 2. There are simply way too many of them and the residents of POW are tired of being ignored. The residents are suffering with freezers empty of deer meat and having their dogs attacked in their yards by wolves. These concerns have been expressed year after year to ADF&G only to be told "we hear you but....". The fall 2022 GMU2 wolf meeting didn't have one person comment in support of a reduced 30 day or less season. The season should have been a full-length season as the management plan called for. An ADF&G lead representative admitted they have to take into account of special interest groups in their decisions. And when it comes to the residents of POW, I guess they hear us but.... ADF&G has also stated that they are going to have the BOG to re-set the wolf management plan harvest tiers to higher levels which should not happen until they actually follow the management plan for a few years.

I'm asking the BOG to please implement some type of protection for the residents, resource users, and wolf prey species and force ADF&G to follow their GMU 2 wolf management plan without a reduced season. It would also be appreciated to have a wildlife biologist on POW and for ADF&G to listen to locals.



**PC139**

**Submitted by:** Sterling Salisbury

**Community of Residence:** Juneau

**Comment:**

I oppose proposal 10 and 11. The proposal contradicts themselves by saying they want to limit the deer tags to four from the current six to help with subsistence hunters and population later in the proposal they say it won't really affect much. The board already moved it from 4 to 6 saying it would have a minimal impact. it's absurd to already be trying to change it back. Leave it the same.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 10:** Oppose

**Proposal 11:** Oppose

**Proposal 21:** Oppose



**PC140**

**Submitted by:** Bryce Saviers

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal 4: I support proposal 4. From what I have seen the unit 1 brown bear population has been increasing over the last few years. I often see multiple brown bears in each bay or running rivers in my jet boat while not seeing as many moose or black bear as years prior. Brown bears aren't targeted by hunters in this area as much as black bear, moose, and deer and I think the lack of seeing these animals around is partly due to an increased brown bear population. Due to the fact that fewer hunters hunt brown bear I believe increasing the harvest from

one bear every 4 years to one bear every 2 years will help create a more stable population for all species while allowing hunters that do want to pursue brown bear more opportunity.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 4:** Support

---

**Submitted by:** Bryce Saviers

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal 28: I am completely against this proposal. As a person who has hunted all over RG014 I think opening up this key bit of wintering goat grounds to hunt is a mistake. The area this proposal wants to open is used as safe wintering grounds mainly for Nannie's and kids. This area has extremely easy access from a popular walking trail and a private road. I think opening up this ground to allow hunting will not only give easy access to safe goat wintering grounds but I also believe will increase nannie harvest even if a boundary line with a 2,000 contour at the head of little sheep creek is implemented. There are only a few starting areas in the RG014 units that is accessible from the road and all include a fairly long hike to get into goat country. This spreads out the hunting pressure throughout the season and also minimizes hunter conflict with non hunters. If you open this area up not only will hunting pressure increase in what was once a safe harbor for wintering mountain goat to get away from predators but it will give extremely easy access to goats due to the private road and popular walking trail that is often used by dog walkers and nature viewers.

I am a firm believer in expanding hunting rights as long as it doesn't hurt the species or hunters long term. This proposal does very little to open up new hunting area but instead opens up a small but key piece of habitat the goats need to survive. There is another proposal for this unit (proposal 29) asking to expand the hunting grounds for RG014 which would allow more road system access without giving easy access to safe goat wintering grounds. I ask the board to reject proposal 28.

---

**Submitted by:** Bryce Saviers

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal 29: I support proposal 29. As of right now RG014 boundary line is limited to the south side of Blackerby Ridge. This is where most of the recreational hikers stay due to a hiking trail that leads from the road system up to the alpine. Opening up the north side of the Blackerby Ridge and extending it to the Heintzelmann Ridge will give more road system access to hunters and allow hunters to spread out instead of being congested onto just one side of Blackerby Ridge which would minimize conflicts between hunters and also from other non hunting trail users. Opening up the north side of Blackerby and Heintzelmann Ridge will also open up multiple new access points along the road system giving more hunting opportunities to people that don't have boats.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

---

**Submitted by:** Bryce Saviers



**PC140**

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal 30: I support proposal 30. As of now the season on the southern end of the Chilkats doesn't open until September 1st. This area has very few bays or coves to anchor a boat in so unless it's a calm day anchoring a boat during the fall in Lynn Canal can be a big mistake. Opening up a archery season starting august 1st wouldn't increase hunting pressure by much due to the logistics of getting over there but would give better access to people wanting to get away from the crowds and hunt the Chilkats before the big fall storms roll in that limit boating and flying.

---

**Submitted by:** Bryce Saviers

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal 31: I support this proposal. This proposal will open up the season a month earlier making it more accessible to hunters and give more opportunities to locals to harvest a goat. As of right now the season doesn't open until September 1 which is generally much worse weather then august. This unit is only reachable by plane or boat and the logistics of getting in and out of this area are completely based on weather. Allowing the season to open a month earlier will help keep hunters safer and also give better opportunity in an area that is abundant with goats.

---

**Submitted by:** Bryce Saviers

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal 33: I support this proposal. The Chilkat Peninsula is well known by locals for having an extremely dense brown bear population. You can only get to the area by boat or plane so the logistics to get over there and hunt are limited by weather and there are closer places to Juneau to hunt brown bear so it doesn't have the pressure that other units have. Because there are fewer brown bear hunters in the area and the brown bear population seems to be at a surplus other species are negatively effected. From my experience I have seen less black bear and moose in the area over the last few years while constantly seeing more brown bear. I think allowing the few amount of hunters that hunt that area to harvest a brown bear every year will bring a better balance to all species in the area while allowing more hunting opportunities for residents.

---

**Submitted by:** Bryce Saviers

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal 34: I support this proposal. The Chilkat Peninsula is well known by locals for having an extremely dense brown bear population. You can only get to the area by boat or plane so the logistics to get over there and hunt are limited by weather and there are closer places to Juneau to hunt brown bear so it doesn't have the pressure that other units have. Because there are fewer brown bear hunters in the area and the brown bear



population seems to be at a surplus other species are negatively effected. From my experience I have seen less black bear and moose in the area over the last few years while constantly seeing more brown bear. I think allowing the few amount of hunters that hunt that area to harvest a brown bear every year will bring a better balance to all species in the area while allowing more hunting opportunities for residents.

---

**Submitted by:** Bryce Saviers

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal 36: I do not support this proposal. This proposal is not based on conservation of the species, and the department of Fish and Game agrees. If grouse numbers are healthy and the access to these birds is abundant throughout the Juneau road system then there is no need to lower the daily limit for local hunters. The author of this proposal states that it will help let less experienced hunters get easier birds along the road system if the daily bag limit is lowered. However, lowering a bag limit of a species whose population is not threatened just for the sole cause of giving people with less hunting experience or people who don't want to put in as much effort as others a better chance at being successful is a dangerous precedent to set. Don't punish other dedicated hunters by cutting their daily bag limit down just to cater to people who don't want to work as hard to be successful.

---

**Submitted by:** Bryce Saviers

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal 37: I do not support this proposal and neither does the department of Fish and Game.

---

**Submitted by:** Bryce Saviers

**Community of Residence:** Juneau, Alaska

**Comment:**

Proposal 41: I support this proposal. Having a quota for Douglas island wolves is pointless due to the fact that those wolves can move easily from the mainland to Douglas island at low tide from multiple different areas. It's an unnecessary restriction that isn't supported by conservation management.

---



**Submitted by:** Glenn Saviers

**Community of Residence:** Juneau, AK

**Comment:**

See my proposal survey

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 4:** Support  
**Proposal 6:** Support  
**Proposal 7:** Support  
**Proposal 8:** Support  
**Proposal 9:** Support  
**Proposal 10:** Oppose  
**Proposal 11:** Oppose  
**Proposal 13:** Support

**Proposal 16:** Support  
**Proposal 17:** Support  
**Proposal 18:** Support  
**Proposal 21:** Oppose  
**Proposal 28:** Oppose  
**Proposal 29:** Support  
**Proposal 30:** Support  
**Proposal 31:** Support

**Proposal 34:** Support  
**Proposal 36:** Oppose  
**Proposal 37:** Oppose  
**Proposal 40:** Support  
**Proposal 41:** Support  
**Proposal 43:** Support  
**Proposal 45:** Support  
**Proposal 46:** Support

**Proposal 47:** Oppose  
**Proposal 48:** Support  
**Proposal 49:** Oppose  
**Proposal 50:** Oppose  
**Proposal 53:** Oppose  
**Proposal 54:** Oppose



**Submitted by:** Sam Sawyer

**Community of Residence:** Thorne Bay, Alaska

**Comment:**

See Attached

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 45:** Oppose  
**Proposal 46:** Support  
**Proposal 47:** Oppose

**Proposal 48:** Oppose  
**Proposal 49:** Oppose  
**Proposal 50:** Oppose

**Proposal 51:** Oppose  
**Proposal 52:** Oppose  
**Proposal 53:** Oppose

**Proposal 54:** Oppose

*See attachment on the following page.*

Sam Sawyer- I oppose Proposal 45.

I oppose Proposal 45 because there are already plenty of wolves in unit 2. I am about to turn 40 years old and have lived in Thorne Bay for 30 of those years. I am an avid hunter and spend many hours a year in the woods. I also have 16 cellular trail cameras and 19 regular trail cameras taking photos and videos year-round. Beginning back in 2015, I started seeing wolves on every camera I have. These cameras are not in one location, they are spread out all over the island. What was initially for deer scouting, turned into wolf scouting. Then I began seeing the wolves in person. This was only the second time in my life seeing a wolf here in unit 2. I ended up seeing 12 wolves by the end of 2015. Fast forward to now. I have seen at least one or two wolves a year since 2015. Some years I have seen up to 16 wolves. I see wolf sign everywhere I go, hear wolves, and my trail cams still get lots of pictures and videos of them. The largest pack I have on video had 13 wolves on it. That video only lasted 30 seconds so there could have been even more. There is no doubt in my mind or any of the residents living on Unit 2, that the wolf population is thriving. There is no good reason to raise the threshold from 150-200 wolves to 250-300 wolves. Furthermore, something else that happened from 2015-2022. The deer population has plummeted. I don't find it to be a coincidence that the deer population plummeted during the same time period that wolf trapping harvest limits were very limited. Some of those years, wolf trapping harvest limits ranged from 7 total wolves trapped, to 14 wolves trapped. During this time period, it is obvious the wolf population grew substantially, while the deer population plummeted.

People living in Unit 2 hold valuable insight as to what is happening on this island. It is impossible for anyone not living here or spending time here, boots on the ground for extended periods of time, to know what is happening here.

Sam Sawyer- Proposal 47

I oppose proposal 47 because not everyone has access to cell phones or cell phone coverage in Unit 2 and Alaska Wildlife Alliance would know this if they spent any amount of time on Unit 2.

Some locations are very remote, and weather can hinder traveling for days. If having to call in within 48 hours was the law, it could hinder trapping efforts. I agree that calling in could happen a little faster than it is now, but 48 hours is a tight window. Also, trappers should not have to tell anyone any location of where they trap wolves.

Sam Sawyer- Proposal 48

I oppose Proposal 48 for a few reasons. Alaska Wildlife Alliance stated that the public has no way of knowing wolf carrying capacity. I find this to be false. When wolf sightings dramatically increase the how they have here, there is something to be said about that. When I have hundreds of photos and videos of wolves on trail cameras a year, there is something to be said about that as well. They are correct when they state there is nowhere on Unit 2 where a wolf pack is not exposed to legal and illegal killings. That can be said about almost everywhere. However, there are a few locations on Unit 2 that I am aware of that make it very difficult to harvest wolves. The cutthroat road and the Honker Road. Both roads are gated and do not allow motorized vehicles. Nobody that I am aware of hunts wolves or trap wolves in these locations due to the difficulty. Trappers aren't going to pack hundreds of pounds of traps 7 miles deep on a road, and anyone hunting wolves here knows how difficult that is with such dense forests.

In ending, the minimum number of wolves (100) currently set by the BOG has shown that it is sustainable over the last couple of years, according to the most recent wolf counts.

Sam Sawyer- Proposal 49

I oppose Proposal 49 because Alaska Wildlife Alliance offers no solution on how to better count the wolf population, they just complain how it is being done. They mention “failure to detect declines does not mean there was no decline.” That’s true, but the same goes for an increase in population. I think the way wolves are being counted could be better, but I don’t know how that will be done. I believe that when a low count is published, I know it is not representative though. Not every wolf will come to a wolf board and rub on it. It is a regular occurrence to have wolves walk passed a wolf board and never touch it, while others do. To me that shows a big number of wolves not being counted and I have numerous videos of this happening. A lot of them look at the wolf boards from a distance and watch younger wolfe rub on them. I honestly believe it is impossible to have an accurate count of wolves in Unit 2, due to their elusiveness to humans and the terrain of the island, and the fact that they travel to other islands and others travel to Unit 2. That’s what they do. If there is failure to detect an increase, it doesn’t mean there wasn’t an increase. I personally feel that was the case this year. With ADF&G observers having difficulty traveling around Unit 2 due to harsh winter conditions, they were unable to spend as much time as they normally would have, collecting DNA sampling from wolf boards and their wolf count was lower than the previous year, even though only 64 wolves were harvested. Residents of Unit2 and the deer population suffer when this occurs.

Sam Sawyer- Proposal 50

I oppose Proposal 50 because Alaska Wildlife Alliance compares Coronation Island to the inner islands on the west side of Unit 2. The tides and currents near Coronation Island don’t compare to the water and tides near the inner islands. The inner islands are way more protected and make it easier for wolves and deer to swim to and from. Again, if they spent any time here, they would know this, and if they went and spent any time on these smaller islands, like Tuxacan or Heceta Islands for example, they would see there is no shortage of wolves on them. However, they have never been here or tried to see for themselves what is really going on here and it is just their opinion that wolves don’t inhabit these islands. These smaller islands need to be accounted for when counting wolves.

Sam Sawyer- Proposal 53

I oppose Proposal 53 because there isn’t enough evidence that supports that illegal or unreported taking of wolves is between 35-50% is constant, and that should not be included the annual harvest reports as such.

Sam Sawyer- Proposal 54

I strongly oppose Proposal 54. Closing certain areas of Unit 2 so that wolves have a “sanctuary” and are safe from trapping does nothing but hurt the deer population and hinder trappers’ ability to trap wolves. Wolves travel this entire island and are constantly moving. We already only have 30 days to hope they come through an area, which sometimes they don’t. To only limit 2/3rds of the island to trapping would



only make trapping them even more difficult and could lead to an abundance of wolves and in turn make an already dwindling deer population even worse. As I have stated before, there are places on Unit 2 where nobody traps or hunts wolves due to gates being installed on roads. I could be wrong, but I believe the Karta wilderness area is off limits for wolf trapping and hunting as well. This is just another request by the Alaska Wildlife Alliance to hinder trapping efforts.



**Submitted by:** Fred Schuman

**Community of Residence:** Troy, MO

**Comment:**

Thank you for taking interest in our thoughts and opinions. I'm in agreement with most of the proposals. I support proposals; 16, 24, 29, 30.

I am not in favor of the proposal 19. To me the herd seems to do better while they are only disturbed by archers. I feel that introducing firearms would effect the natural rut action the elk. I believe the gun shot pressure would push the elk to become mostly nocturnal. This would impede both archers and firearms hunters.

Thank you again for this opportunity.

Fred Schuman

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 19:** Oppose

---



**Submitted by:** Mark Schwan

**Community of Residence:** Juneau, Alaska

**Comment:**

Mark Schwan

Juneau, Alaska

I am commenting on Proposal 40, to allow the taking of deleterious wildlife in the Mendenhall Wetlands State Game Refuge.

I strongly OPPOSE the proposal and support the Department's comments in strong opposition to this proposal.

There are continued user conflicts occurring on the refuge between hunters, dog walkers, hikers, wildlife viewers and photographers. Allowing people to wander the refuge year-round with weapons in hopes of taking European Starlings would create new, contentious interactions and raise more safety issues. The likelihood of doing anything meaningful for reducing a rather small local population of European Starlings is practically nil.

Moreover, even if the Board were to allow just the opportunity for fall duck hunters to take European Starlings, this is still very problematic. There is a real possibility that hunters would kill non-targeted songbirds, especially Rusty Blackbirds and Red-winged Blackbirds, both of which occur on the Wetlands during the fall. Rusty Blackbirds are in extreme decline across the continent and they have declined in number locally. There is no doubt some hunters would shoot at these species thinking they are European Starlings. Let's not present such an opportunity.

If there is a desire to reduce the number of European Starlings in Juneau, lets explore other strategies. Thank you for the opportunity to comment.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 40:** Oppose

---

**Submitted by:** Craig Schwanke

**Community of Residence:** Craig

**Comment:**

I'm an avid waterfowl hunter on Prince of Wales (POW). I oppose a split season for waterfowl in southeast Alaska. In southern southeast AK the best waterfowl hunting occurs in October-November when migratory geese and ducks pass through. A split season will likely have a closure during this time frame, which I oppose. I prefer a fixed season start date of September 16 with a continuous season or the status quo of continuous seasons lengths with alternating season start and end dates to accommodate hunters in northern and southern southeast Alaska. A split season will also be a regulatory burden on hunters with the creation of complex regulations. There are not a lot of local ducks in southern southeast AK during the month of September and the birds that are available tend to feed on the abundant salmon eggs and dead salmon present in streams and tidal flats which decreases their table quality. A start date of September 16 was preferred by 41% of hunters surveyed by ADFG in 2008.

If a split season is adopted, I suggest a season closure starting December 1. At least this will extend sea duck hunting opportunity later into the winter.

Thank you for your consideration!

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 5:** Oppose

---



**Submitted by:** Linda Shaw

**Community of Residence:** Juneau, Alaska

**Comment:**

I support Alaska Wildlife Alliance proposals 45, 47, 48, 49, 50, 51, 52, 53, and 54. The Board of Game needs to represent the views of all Alaskans and stop excessive predator control.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 45:** Support  
**Proposal 47:** Support  
**Proposal 48:** Support

**Proposal 49:** Support  
**Proposal 50:** Support  
**Proposal 51:** Support

**Proposal 52:** Support  
**Proposal 53:** Support  
**Proposal 54:** Support

---

# Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska



PC147

December 16, 2022

Board of Game  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

**RE: STA Comments Southeast Alaska on Game Proposals  
Regional – Proposals 1, 2, and 4  
Sitka-Unite 4 Proposals 10, 11, and 13**

Dear Board Members,

I write on behalf of the Sitka Tribe of Alaska (STA), Tribal government in Sitka, Alaska, with over 4,500 Tribal citizens. As a Tribal government, STA is responsible for the health, safety, welfare, and cultural preservation of its tribal citizens. STA respectfully submits the following comments on Southeast Alaska game proposals.

### **Proposal 1 – Support**

Hunting is an important part of the Native culture and an important cultural practice to pass on to tribal youth. Hunter and gun safety are key parts of that of the learning experience. STA supports this proposal providing the State of Alaska can provide adequate access to the mandated training.

### **Proposal 2 – Support**

This proposal can potentially increase the number of goats harvested in the Sitka area by preventing the unintended harvest of nannies. Other big game hunts around the State have similar requirements that maximize the harvest while minimizing the impact on big game populations. STA supports this proposal based on the increased subsistence food it will provide to tribal citizens.





**Proposal 4 – Support**

This proposal has the potential to increase hunting efforts and achieve the full allowable harvest. STA supports additional hunting opportunities for resident hunters, especially if it has the potential to reduce bear and human encounters in Sitka.

**Proposal 10 and 11 - Oppose**

STA would support these proposals if there had been a companion proposal on the federal level to maintain a 6 deer harvest level for rural residents. This scenario would have provided increased opportunities for rural residents to meet their cultural and subsistence needs. STA is opposed to these proposals as written.

**Proposal 13 – Support**

Over the last 2 years, Sitka has had an explosion of bear-human encounters that have resulted in at least 15 bears being euthanized during this timeframe. STA believes the increase in these types of encounters is due to a robust bear population in the Sitka area. The increased harvest rate being proposed would lower the population of bears in Sitka and reduce these negative encounters.

If you have any questions regarding these, contact STA's Resource Protection Director, Jeff Feldpausch at (907)747-7469 or email [jeff.feldpausch@sitkatrine-nstn.gov](mailto:jeff.feldpausch@sitkatrine-nstn.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Lawrence Widmark".

Lawrence Widmark  
Tribal Chairman



**Submitted by:** Victoria Smith

**Community of Residence:** 682 Evergreen Ave

**Comment:**

I am in support of proposal 17. Numerous times over to the island has made it very clear that the elk herd is large and multiplying rapidly. The meat would support the locals immensely.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

**Proposal 17:** Support

---



**Submitted by:** Martha Smith

**Community of Residence:** Petersburg, Alaska

**Comment:**

Proposal # 24: As a resident of Petersburg and recreational user of Petersburg Creek, I am strongly opposed to opening this drainage to bow hunting of black bear. There are very few areas close to town where elders, families and visitors can explore in the hope of seeing black bear in natural habitat. Residents of Kupreanof and of Mitkof Islands have worked hard to protect this area from trophy hunters and I urge you to reject this proposal. The harvesting of fish, moose and deer, in my mind, can be understood as a means of providing food for our families. Bear hunting does not fit within this justification.

Proposal # 25: Above comments apply to this proposal; I strongly oppose.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 24:** Oppose

**Proposal 25:** Oppose

---



**Submitted by:** Southeast Alaska Conservation Council

**Community of Residence:** Douglas, Alaska

**Comment:**

Please accept these comments on behalf of the Southeast Alaska Conservation Council.

Proposal 12, Mitchell Bay Closed Area

SEACC opposes Proposal 12.

Based in Juneau, Alaska on Áak’w K̄wáan land, Southeast Alaska Conservation Council (SEACC) is a regional grassroots conservation organization with over 7,000 supporters. For over 50 years, SEACC has been bringing together diverse Alaskans from our region’s communities to protect the natural resources of Southeast Alaska, ensure sound stewardship of the lands and waterways of our region, and protect subsistence resources and traditional ways of life side-by-side with fishing, hunting, tourism and recreation.

SEACC supports maintaining the closed status of the Mitchell Bay Closed Area in Unit 4 on Admiralty Island. Our membership, which includes a blend of users from hunters and fishers to wildlife viewers and recreational guides, values a diversity of uses which, in turn, means a diversity in management approaches.

The limited and small closed areas that are dedicated to non-consumptive use are important to our members and to the economy of Southeast Alaska. The Mitchell Bay Closed Area has a high use value for wildlife viewing and the economic potential of non-consumptive viewing use of the brown bear population there is important to Angoon. With over 96% of Admiralty Island open to brown bear hunting, this small closed area does not create an undue burden on Alaska bear hunters or brown bear hunt guiding operations who have good and accessible brown bear hunting opportunities nearby.

Please keep the Mitchell Bay Closed Area of Mitchell Bay, Kootznahoo Inlet, Kanalkoo Bay, and Favorite Bay closed to brown bear hunting.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 12:** Support

---