Ketchikan Area and Prince of Wales – Units 1A & 2

PROPOSAL 37

5 AAC 85.030. Hunting seasons and bag limits for deer.

Reduce the bag limit for deer in Unit 2 from four to three bucks as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

We hope to reduce the bag limit for deer in Unit 2 as follows:

5 AAC 85.030 Hunting seasons and bag limits for deer/

Unit 2: Prince of Wales Island

3 Bucks [4 Bucks]

Reduce deer bag limit to 3 bucks in Unit 2 Prince of Wales Island.

What is the issue you would like the board to address and why?

The Sitka black tailed deer population in Unit 2 on Prince of Wales (POW) Island is declining. Deer are an important subsistence food security resource for all the local rural communities of POW Island. The Island has better road access than most other locations with deer. Factors affecting the decline of deer include habitat loss, wolf and black bear predation, deep snow years, and one of the most liberal deer bag limits in Alaska. The deer bag limit on POW is currently four bucks. Reducing the hunter bag limit to three bucks should conserve and help maintain the deer herd for the future.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Yes, the East Prince of Wales Island Advisory Committee members developed this proposal with input from Unit 2 residents. These residents have noticed and are concerned about the steady and significant decline in deer numbers and their availability for subsistence food resources. Scientific publications depicting trends of concern on the POW Island deer may be found on the website: www.sitkablacktaildeer.org.

PROPOSAL 38

5 AAC 85.030. Hunting seasons and bag limits for deer.

Reduce the resident bag limit for deer in Unit 2 from four bucks to three as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Reduce the deer bag limit in Unit 2 for residents to three bucks total.

What is the issue you would like the board to address and why?

The Sitka Blacktail deer population on Prince of Wales Island (PoW) crashed in 2017, 2018, and 2019. This was due to increasingly degraded forest habitat related to past timber harvest and the increase in the wolf population from 2015-2019. The broad loss of old growth forest habitat in central and north PoW has hada notable reduction on the ability of the landscape to produce and support deer. The value of old growth forest habitat to a healthy deer population can not be overstated. This loss of quality habitat and theconsequential increase in the number one predator of deer (wolves) has significantly depleted the PoW deer population.

Factors affecting the PoW deer herd are; habitat loss, wolf and black bear predation and human predation resulting from some of the most liberal deer hunting season in the state and likely in the US. If you are a resident of PoW and are hunting under federal regs, the deer hunting season is July 25-Jan. 31. If you are a nonresident, the deer hunting season is Aug. 1-Dec. 31. The current deer hunting state bag limit for residents/nonresidents is four bucks.

Our deer herd is depressed enough that we feel it is reasonable to limit the resident hunters. Unit 2 only has three big game animals; wolf, black bear and deer. The year-round residents of PoW heavily rely on deer to feed our families. PoW grocery stores are limited to Craig, Klawock and Thorne Bay. This drives our grocery prices higher than other areas in Southeast AK and many other places in Alaska. Ketchikan was recently granted a rural designation and will be able to harvest under subsistence regulations, thereby competing with residents of PoW for our deer and other resources.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

The Craig Advisory Committee members developed this proposal with input from other Unit 2 residents. We have noticed and are concerned about the steady and significant decline in deer numbers and their availability forsubsistence food resources. Scientific publications depicting trends of concern about the deer of PoW can be found at www.sitkablacktaildeer.org.

PROPOSAL 39

5 AAC 85.030. Hunting seasons and bag limits for deer.

Reduce bag limit for deer in Unit 2 from four bucks to two as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

We hope to reduce the bag limit for deer in Unit 2 Princip of Wales Island as follows:

5 AAC 85.030 Hunting seasons and bag limits for deer.

Unit 2: Prince of Wales Island

2 Bucks [4 Bucks]

What is the issue you would like the board to address and why?

The Sitka black tailed deer population in Unit 2 on Prince of Wales (PoW) Island is declining. Deer are an important subsistence food security resource for all the local rural communities of PoW Island. The Island has better road access than most other locations with deer. Factors affecting the decline of deer include habitat loss, wolf and black bear predation, deep snow years, and one of the most liberal deer bag limits in Alaska. The deer bag limit on PoW is currently four bucks. Reducing the hunter bag limit to two bucks should conserve and help maintain the deer herd for the future.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Yes, the East Prince of Wales Island Advisory Committee members developed this proposal with input from Unit 2 residents. These residents have noticed and are concerned about the steady and significant decline in deer numbers and their availability for subsistence food resources. Scientific publications depicting trends of concern on the POW Island deer may be found on the website: www.sitkablacktaildeer.org.

PROPOSED BY: East Prince of Wales Fish and Game Advisory Committee (OI-F25-009)

PROPOSAL 40

5 AAC 85.030. Hunting seasons and bag limits for deer.

Reduce the nonresident bag limit for deer in Unit 2 from four bucks to one as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Proposal: The Klawock Advisory Committee proposes to change the deer harvest in Unit 2 to: One buck for nonresidents.

What is the issue you would like the board to address and why?

The Sitka Blacktail deer population on Prince of Wales Island (PoW) crashed in 2017, 2018 & 2019 mainly due to the increase in wolf population from 2015-2019. Between 1985 and 2001 the wolf harvest on PoW ranged from 18-132 wolves and the season length was Dec. 1-March 31 with no closures and no limit.

In 1993, the 1st petition to list the Alexander Archipelago wolves under the Endangered Species Act (ESA) was filed and Alaska Department of Fish & Game (ADF&G) defeated it.

In 2011, a 2nd petition was filed and ADF&G countered with a wolf management change in 2015 to avoid the listing.

In 2015, wolves on PoW were managed under a quota system resulting in the following harvest:

2015: 7 total wolves harvested 2016: 30 total wolves harvested 2017: 62 total wolves harvested

2018: 46 total wolves harvested

The 2018 deer season was dramatic for many of us. We saw more wolf scat with deer bones/hair in it than we saw deer. Nearly every mountain, road, beach, etc. had wolf scat on it and our deer were very hard to find since so many died from wolves.

In 2019, ADF&G changed wolf management to its current format of a variable season length which resulted in the harvest of 164 wolves. This jump in wolf harvest triggered the 3rd petition to list the Alexander Archipelago wolves under the ESA in July of 2020.

With a lot of effort, ADF&G defeated the petition and has continued to manage wolves under its current format of a tight season length to control the take.

Currently, ADF&G has a handle on wolf management but PoW still suffers from a depressed deer herd and every deer is important until our herd rebounds. Nonresidents hunters come to PoW for the opportunity to harvest a large male buck. They do not come here specifically for the meat, but rather for the experience and the chance at a trophy Sitka Blacktail deer.

Our deer herd is struggling and residents heavily rely on venison to feed our families. PoW only has one good eating big game animal.

We feel a one buck bag limit for nonresidents is justified and prudent until our deer population rebounds.

Respectfully,

The Klawock Fish & Game Advisory Committee

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 41

5 AAC 85.030. Hunting seasons and bag limits for deer.

Reduce the nonresident bag limit for deer in Unit 2 from four bucks to one as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Proposal: Reduce the deer bag limit in Unit 2 for nonresidents to one buck total.

What is the issue you would like the board to address and why?

The Sitka Blacktail deer population on Prince of Wales Island (PoW) crashed in 2017, 2018 & 2019. This was due to increasingly degraded forest habitat related to past timber harvest and the increase in the wolf population from 2015-2019. The broad loss of Old Growth forest habitat in central and north PoW has had a notable reduction on the ability of the landscape to produce and support deer. The value of old growth forest habitat to a healthy deer population can not be overstated. This loss of quality habitat and the consequential increase in the number one predator of deer (wolves) has significantly depleted the PoW deer population.

Factors affecting the PoW deer herd are; habitat loss, wolf and black bear predation and human predation resulting from some of the most liberal deer hunting season in the state and likely in the US. If you are a resident of PoW and are hunting under federal regs, the deer hunting season is July 25-Jan. 31. If you are a nonresident, the deer hunting season is Aug. 1-Dec. 31. The current deer hunting state bag limit for residents/nonresidents is four bucks.

Our deer herd is depressed enough that we feel it is reasonable to limit the nonresident hunters. Unit 2 only has three big game animals; wolf, black bear and deer. The year-round residents of PoW heavily rely on deer to feed our families. PoW grocery stores are limited to Craig, Klawock and Thorne Bay. This drives our grocery prices higher than other areas in Southeast AK and many other places in Alaska. Ketchikan was recently granted a rural designation and will be able to harvest under subsistence regulations, thereby competing with residents of PoW for our deer and other resources.

Nonresidents come to PoW for an Alaskan adventure and the opportunity to harvest a mature Sitka Blacktail deer that arguably, have larger antlers for the species than anywhere else in the world.

Nonresident hunters do not need the meat like locals/residents. Nonresident hunters can also hunt black bear and fish during the hunting season, so there are plenty of other adventures for them to partake in after they tag out on their one buck. This reduction will hopefully be temporary until our deer herd rebounds.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

The Craig Advisory Committee members developed this proposal with input from other Unit 2 residents. We have noticed and are concerned about the steady and significant decline in deer numbers and our availability for subsistence food resources. Scientific publications depicting trends of concern about the deer of PoW can be found at www.sitkablacktaildeer.org.

PROPOSAL 42

5 AAC 85.030. Hunting seasons and bag limits for deer.

Change the nonresident start date for the deer hunting season in Unit 2, to August 15 as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Proposal: Change the start date for deer in Unit 2 for nonresidents to August 15.

What is the issue you would like the board to address and why?

The Sitka Blacktail deer population on Prince of Wales Island (PoW) crashed in 2017, 2018 & 2019. This was due to increasingly degraded forest habitat related to past timber harvest and the increase in the wolf population from 2015-2019. The broad loss of old growth forest habitat in central and north PoW has had a notable reduction on the ability of the landscape to produce and support deer. The value of old growth forest habitat to a healthy deer population can not be

overstated. This loss of quality habitat and the consequential increase in the number one predator of deer (wolves) has significantly depleted the PoW deer population.

Factors affecting the PoW deer herd are; habitat loss, wolf and black bear predation and human predation resulting from the most liberal deer hunting season in the state and likely in the US. If you are a resident of PoW and are hunting under federal regs, the deer hunting season is July 25-Jan. 31. If you are a nonresident, the deer hunting season is Aug. 1-Dec. 31. The current deer hunting state bag limit for residents/nonresidents is four bucks.

Our deer herd is depressed enough that we feel it is reasonable to limit the nonresident hunters. Unit 2 only has three big game animals; wolf, black bear and deer. The year-round residents of PoW heavily rely on deer to feed our families. PoW grocery stores are limited to Craig, Klawock and Thorne Bay. This drives our grocery prices higher than other areas in Southeast AK and many other places in Alaska. Ketchikan was recently granted a rural designation and will be able to harvest under subsistence regulations, thereby competing with residents of PoW for our deer and other resources.

Nonresidents come to PoW for an Alaskan adventure and the opportunity to harvest a mature Sitka Blacktail deer that arguably, have larger antlers for the species than anywhere else in the world. Nonresident hunters do not need the meat like locals/residents. Nonres hunters can also hunt black bear and fish during the hunting season, so there are plenty of other adventures for them to partake in after they tag out on their one buck. The Aug. 15 start date for nonresidents will allow resident hunters the opportunity to harvest bucks above treeline (alpine) without the increased competition from nonresident hunters. This reduction will hopefully be temporary until our deer herd rebounds.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

The Craig AC members developed this proposal with input from other Unit 2 residents. We have noticed and are concerned about the steady and significant decline in deer numbers and their availability for subsistence food resources. Scientific publications depicting trends of concern about the deer of PoW can be found at www.sitkablacktaildeer.org.

PROPOSAL 43

5 AAC 85.030. Hunting seasons and bag limits for deer.

Increase the deer bag limit and extend the season length for residents and nonresidents on the Cleveland Peninsula as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Lengthen the season and increase the bag limit for deer in Unit 1A on the southern portion of the Cleveland Peninsula by aligning seasons and bag limits with the rest of Unit 1A. The bag limit will increase from two bucks to four bucks, and the season will increase by one month.

5 AAC 85.030. Hunting seasons and bag limits for deer

Units and Bag Limits	Resident	Nonresident
	Open Season	Open Season
	(Subsistence and	•
	General Hunts)	

(1)

Unit 1 (A) [THAT PORTION Aug. 1 – <u>Dec. 31</u> [NOV. 30] Aug. 1 – <u>Dec. 31</u> [NOV. 30] ON THE CLEVELAND PENINSULA BOUNDED BY AN EAST-WEST LINE FROM YES BAY TO SANTA ANNA INLET]

4 [**2**] bucks

What is the issue you would like the board to address and why?

The Alaska Department of Fish & Game proposes increasing the bag limit and season length for deer on the portion of the Cleveland Peninsula south of the divide between Santa Anna Inlet and Yes Bay in Unit 1A. That area has a shorter season and lower bag limit for deer than the remainder of Unit 1A, including the adjacent mainland. Deer harvest in Unit 1A has consistently increased over the past 10 years (2014–2023) while the average days of hunting effort needed to harvest a deer have decreased, suggesting an increase in abundance. Trends on the southern portion of the Cleveland Peninsula have mirrored trends elsewhere in Unit 1A, indicating that additional harvest opportunity is available in that area.

In addition to offering greater sustainable harvest opportunity, aligning the season dates and bag limit with the rest of Unit 1A would simplify regulations. The rest of Unit 1A currently has a 4-buck bag limit and an August 1 to December 31 open season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Alaska Department of Fish and Game (HQ-F25-032)

PROPOSAL 44

5 AAC 85.040. Hunting seasons and bag limits for goat.

Limit the nonresident permit allocation for the Unit 1A goat drawing hunt DG005, to "up to" 20% of the available permits as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Limit nonresident permit allocation for drawing hunt DG005 to UP TO 20% of the available permits. If at least five permits are not issued a nonresident permit will not be available.

What is the issue you would like the board to address and why?

Limit the number of tags that may be drawn by nonresidents for drawing hunt DG005. There is currently no cap on how many tags may be drawn by nonresidents. If nothing is changed residents will continue to lose opportunities to hunt in easier accessible areas that are limited to drawing hunts because of said access issues. The nature of many hunts in Alaska requires that hunters use expensive modes of transportation to access an area to hunt. Many of the drawing hunts are only restricted to drawing because they are in easier accessible areas. Even where access is not the primary limiting factor Alaskan residents are being out competed by guided nonresidents in the draw by outfitters and license application services. Additionally caribou, moose, bison, muskox, black bear and elk do not require a guide and non-guided nonresident interest in these species is increasing.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

No

PROPOSAL 45

5 AAC 85.040. Hunting seasons and bag limits for goat.

Limit the nonresident permit allocation for the Unit 1A goat drawing hunt DG006, to "up to" 20% of the available permits as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Limit nonresident permit allocation for drawing hunt DG006 to UP TO 20% of the available permits. If at least five permits are not issued a nonresident permit will not be available.

What is the issue you would like the board to address and why?

Limit the number of tags that may be drawn by nonresidents for drawing hunt DG006. There is currently no cap on how many tags may be drawn by nonresidents. If nothing is changed residents will continue to lose opportunities to hunt in easier accessible areas that are limited to drawing hunts because of said access issues. The nature of many hunts in Alaska requires that hunters use expensive modes of transportation to access an area to hunt. Many of the drawing hunts are only restricted to drawing because they are in easier accessible areas. Even where access is not the primary limiting factor Alaskan residents are being out competed by guided nonresidents in the draw by outfitters and license application services. Additionally caribou, moose, bison, muskox, black bear and elk do not require a guide and non-guided nonresident interest in these species is increasing.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

No

PROPOSAL 46

5 AAC 85.040. Hunting seasons and bag limits for goat.

Limit the nonresident permit allocation for the Unit 1A goat drawing hunt DG008, to "up to" 20% of the available permits as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Limit nonresident permit allocation for drawing hunt DG008 to UP TO 20% of the available permits. If at least five permits are not issued a nonresident permit will not be available.

What is the issue you would like the board to address and why?

Limit the number of tags that may be drawn by nonresidents for drawing hunt DG008. There is currently no cap on how many tags may be drawn by nonresidents. If nothing is changed residents will continue to lose opportunities to hunt in easier accessible areas that are limited to drawing hunts because of said access issues. The nature of many hunts in Alaska requires that hunters use expensive modes of transportation to access an area to hunt. Many of the drawing hunts are only restricted to drawing because they are in easier accessible areas. Even where access is not the primary limiting factor Alaskan residents are being out competed by guided nonresidents in the draw by outfitters and license application services. Additionally caribou, moose, bison, muskox, black bear and elk do not require a guide and non-guided nonresident interest in these species is increasing.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

No

PROPOSAL 47

5 AAC 92.220. Salvage of game meat, furs, and hides.

Eliminate the Unit 2 meat salvage requirement for resident black bear hunting in May as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Proposal: Eliminate meat salvage requirement in May for black bear in Unit 2 for residents only.

What is the issue you would like the board to address and why?

The Sitka Blacktail deer population on Prince of Wales Island (PoW) crashed in 2017, 2018 & 2019. This was due to increasingly degraded forest habitat related to past timber harvest and the increase in the wolf population from 2015-2019. The broad loss of old growth forest habitat in central and north PoW has had a notable reduction on the ability of the landscape to produce and support deer. The value of old growth forest habitat to a healthy deer population can not be

overstated. This loss of quality habitat and the consequential increase in the number one predator of deer (wolves) has significantly depleted the PoW deer population.

Factors affecting the PoW deer herd are; habitat loss, wolf and black bear predation and human predation resulting from the most liberal deer hunting season in the state and likely in the US.

Our deer herd is depressed enough that we feel it is reasonable to change the meat salvage requirements for black bear hunters in Unit 2. This would incentivize residents to harvest more black bears to reduce the take of fawns by bears.

Unit 2 only has three big game animals; wolf, black bear and deer.

PoW grocery stores are limited to Craig, Klawock and Thorne Bay. This drives our grocery prices higher than other areas in Southeast AK and many other places in Alaska.

Ketchikan was recently granted a rural designation and will be able to harvest under subsistence regulations, thereby competing with residents of PoW for our deer and other resources.

Eliminating the meat salvage requirement in May for black bear in Unit 2 for residents will increase the harvest of black bear on PoW further improving the deer population. This change will hopefully be temporary until our deer herd rebounds.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

The Craig AC members developed this proposal with input from other Unit 2 residents. We have noticed and are concerned about the steady and significant decline in deer numbers and our availability for subsistence food resources. Scientific publications depicting trends of concern about the deer of PoW can be found at www.sitkablacktaildeer.org.

PROPOSAL 48

5 AAC 92.008. Harvest guideline levels.

Increase the Unit 2 wolf population objective as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

For purposes of management of the named species, the department shall manage harvest by hunting and trapping as follows:

(1) Wolves: the annual harvest of wolves in Unit 2 should be managed to maintain the unit-wide population within a range of **200-300** [150-200] wolves;

What is the issue you would like the board to address and why?

Based on a retrospective evaluation, data suggests the early population estimates from regulatory year (RY) 2014 and RY2015 that the Board of Game (board) referenced when setting the current

objective, likely underrepresented true population size. Research since the objective was set in 2019 also found the Unit 2 wolf population is reproductively isolated and has a high degree of inbreeding, which increases the potential for inbreeding depression. The available information indicates that sustainable management of Unit 2 wolves requires consideration of both demographic and genetic factors along with public sentiment and other information. Based on this information, the department is managing for a larger Unit 2 wolf population than the fall population objective of 150-200 wolves. Numerous research projects are ongoing; however, findings and new tools to inform management will not be available for the January 2026 Board of Game meeting in Wrangell. Until new information is available, maintaining the current larger population size is the best option to conserve existing genetic diversity and future management options. Therefore, the department proposes increasing the fall population objective range in Unit 2 from 150–200 to 200–300 wolves.

To help resolve long-standing management challenges and take advantage of advances that allowed annual population estimates, at the January 2019 Bord of Game meeting in Petersburg the department proposed fundamental changes to management of Unit 2 wolves. These changes included managing harvest opportunity, primarily trapping season length, to achieve a level of harvest that maintains the wolf population within a fall population objective range set by the board. The board recognized that the fall population objective would play a pivotal role and referenced the best available information to ensure consistency with the Alaska Constitution's mandate for sustained yield management. Board members also recognized that the population objective would require periodic review as new information became available.

Research since the 2019 Board of Game meeting found that wolves in Southeast Alaska have been generally isolated from other North American wolf populations for thousands of years with slowly declining genetic diversity. Within Southeast Alaska, the Unit 2 population is the most reproductively isolated, with the lowest genetic diversity and the highest degree of inbreeding. Although no signs of inbreeding depression have been detected, these conditions signal an increased level of risk for Unit 2 wolves.

Field and laboratory aspects of population genetics research are time-consuming. However, new tools for modeling likely outcomes of different management scenarios and for monitoring changes in genetic diversity and inbreeding should be available before the next Southeast Alaska Board of Game meeting in 2029. Until better information is available, as a conservation measure, the department proposes increasing the fall Unit 2 wolf population objective range to preserve future management options.

PROPOSAL 49

5 AAC 84.270. Furbearer trapping.

Change the season start date for wolf trapping in Unit 2 to December 15 or January 1 as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Proposal: The Klawock Advisory Committee proposes to change the wolf harvest start date in Unit 2 to: Dec. 15 or Jan. 1

What is the issue you would like the board to address and why?

The Sitka Blacktail deer population on Prince of Wales Island (PoW) crashed in 2017, 2018 & 2019 mainly due to the increase in wolf population from 2015-2019.

Between 1985 and 2001 the wolf harvest on PoW ranged from 18-132 wolves and the season length was Dec. 1-March 31 with no closures and no limit.

In 1993, the 1st petition to list the Alexander Archipelago wolves under the Endangered Species Act (ESA) was filed and Alaska Dept. of Fish & Game (ADF&G) defeated it.

In 2011, a 2nd petition was filed and ADF&G countered with a wolf management change in 2015 to avoid the listing.

In 2015, wolves on PoW were managed under a quota system resulting in the following harvest:

2015: 7 total wolves harvested

2016: 30 total wolves harvested

2017: 62 total wolves harvested

2018: 46 total wolves harvested

The 2018 deer season was dramatic for many of us. We saw more wolf scat with deer bones/hair in it than we saw deer. Nearly every mountain, road, beach, etc. had wolf scat on it and our deer were very hard to find since so many died from wolves.

In 2019, ADF&G changed wolf management to its current format of a variable season length which resulted in the harvest of 164 wolves. This increase in wolf harvest triggered the 3rd petition to list the Alexander Archipelago wolves under the ESA in July of 2020.

With a lot of effort, ADF&G defeated the petition again and has continued to manage wolves under its current format of a tight season length to control the take.

The current start date for wolf trapping is Novomber 15 but there are multiple issues with this early start date.

Six years ago, the wolf trapping season start date was moved from December 1st to November 15th and there have been many conflicts:

- 1) The deer are still rutting and the deer bycatch in snares is a real problem.
- 2) Many black bear are still out and the black bear bycatch in snares is a real problem as well as bears destroying traps/snares.

- 3) There are lots of hunters in the field in November and many have come across wolves caught in traps/snares and have taken/shot the wolves and not reported them since the current regulation of unmarked traps is still in effect. The hunters dispatch the wolf and don't know who to contact.
- 4) ADF&G is still conducting their wolf hair board studies until December 5 and the extra human presence in the field negatively affects the wolf trappers.
- 5) There are still waterfowl hunters in the field at this time and the tide flats see more human pressure also influencing the wolves and negatively affecting the trappers.
- 6) Many trappers would prefer to start trapping in December after the hides are fully prime; which most agree don't become prime until Dec. 1.
- 7) November weather is generally worse than December and also negatively affects the trappers.
- 8) There is a proposal to change the federal subsistence wolf trapping start date to December 15. Respectfully,

The Klawock Fish & Game Advisory Committee

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 50

5 AAC 84.270. Furbearer trapping.

Move the start date of the wolf trapping season in Unit 2 to December 15 as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Proposal: Move the start date of wolf trapping season in Unit 2 to Dec. 15.

If adopted the regulation would read: Unit 2 wolf trapping season start date: Dec. 15th.

What is the issue you would like the board to address and why?

The East Prince of Wales Advisory Committee would like to move the start date for wolf trapping from November 15 to December 15.

Since the wolf trapping season start date was moved from December 1 to November 15 start date six years ago, there has been an overwhelming increase in conflicts with other user groups and black bears. These user groups include deer hunters, waterfowl hunters and biologists conducting the wolf population study on the Unit 2 wolves. Having a later start date would reduce these conflicts.

Unit 2 is made up of Prince of Wales Island (PoW) and many smaller islands. PoW is one of the most accessible areas in the entire state with easy access from a daily ferry and planes from Ketchikan combined with over 2000 miles of roads. The shoreline and surrounding islands are also

easily accessed by boat. The current November 15th start date overlaps the deer rut and PoW gets a lot of off island deer hunters as well as many local deer hunters.

Several wolf trappers are setting their traps and having deer hunters come across them while in the process.

Waterfowl hunters are also hunting during this time and conflicts arise with wolf trappers who set their gear at the heads of the bays in the tide flats that are also frequented by waterfowl hunters and their dogs.

Southeast Alaska is a temperate rain forest generally with warmer falls and mild winters. Many trappers prefer to wait and trap later in December because the pelts don't get fully prime until December 1. Currently, the short 30 day wolf trapping season in Unit 2, forces the wolf trappers to start November 15 when many of the pelts are not fully prime.

Another issue the trappers are having is catching black bear in their sets. There are still significant numbers of bears out in November and several have reported accidentally catching black bear; mostly in November. This issue will be resolved by moving the start date to December 15.

The most important reason to change the start date are the conflicts with the wolf population study. It has been voiced at many wolf meetings with ADF&G and USFS that the study is in direct competition with the wolf trappers. Over the years, ADF&G has either agreed or remained neutral that a change in the start date would be beneficial for them. Wolf study staff have had run-ins with wolf trappers and their gear when they are conducting an essential study to manage the wolf population. Their study concludes in early December so this conflict would also be resolved by moving to December 15.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 51

5 AAC 84.270. Furbearer trapping

Extend the wolf trapping season to 45 days on Prince of Wales Island, Unit 2 as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Proposal: Wolf trapping season length of 45 days.

What is the issue you would like the board to address and why?

The Sitka Blacktail deer population on Prince of Wales Island (PoW) crashed in 2017, 2018 & 2019. This was due to increasingly degraded forest habitat related to past timber harvest and the increase in the wolf population from 2015-2019. The broad loss of Old Growth forest habitat in central and north PoW has had a notable reduction on the ability of the landscape to produce and support deer. The value of old growth forest habitat to a healthy deer population can not be

overstated. This loss of quality habitat and the consequential increase in the number one predator of deer (wolves) has significantly depleted the PoW deer population.

Between 1985 and 2001 the wolf harvest on PoW ranged from 18-132 wolves and the season length was Dec. 1-March 31 with no closures and no limit.

In 1993, the 1st petition to list the Alexander Archipelago wolves under the Endangered Species Act (ESA) was filed and Alaska Dept. of Fish & Game (ADF&G) defeated it.

In 2011, a 2nd petition was filed and ADFG countered with a wolf management change in 2015 to avoid the listing.

In 2015, wolves on PoW were managed under a quota system resulting in the following harvest:

2015: 7 total wolves harvested

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2018: 46 total wolves harvested

The 2018 deer season was dramatic for many of us. We saw more wolf scat with deer bones/hair in it than we saw deer. Nearly every mountain, road, beach, etc. had wolf scat on it and our deer were very hard to find.

In 2019, ADF&G changed wolf management to its current format of a variable season length which resulted in the harvest of 164 wolves. This increase in wolf harvest triggered the 3rd petition to list the Alexander Archipelago wolves under the ESA in July of 2020.

With a lot of effort, ADF&G defeated the petition again and has continued to manage wolves under its current format of a tight season length to control the take.

Six years ago, the wolf trapping season start date was moved from December 1st to Nov. 15th and there have been conflicts:

- 1) The deer are still rutting and the deer bycatch in snares is a problem.
- 2) Many black bear are still out and the black bear bycatch in snares is a problem as well as bears destroying traps/snares.
- 3) There are lots of hunters in the field in November and many have come across wolves caught in traps/snares and have taken/shot the wolves and not reported them.
- 4) ADF&G is still conducting their wolf hair board studies until Dec. 5 and the extra human presence in the field negatively affects the wolf trappers.
- 5) There are still waterfowl hunters in the field at this time and the tide flats see more human pressure also influencing the wolves and negatively affecting the trappers and potentially, dogs.
- 6) November weather/winds are generally worse than December and also negatively affects the trappers. Last year the beach trappers lost at least five days of the season due to high winds.

Extending the wolf trapping season to 45 days would improve the safety, decrease some of the above conflicts, allow trappers the flexibility to choose their weather windows of checking traps

instead of the current derby style season, gain more participation from younger/newer trappers and make trapping more enjoyable.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Craig Fish and Game Advisory Committee (OI-F25-037)

PROPOSAL 52

5 AAC 92.127. Intensive Management Plans IX.

Add Unit 2 as an area for intensive mangaement of wolves as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

The harvest of wolves will be increased to a level that will allow deer populations to increase.

What is the issue you would like the board to address and why?

Add Unit 2 as an area of intensive management for the harvest of wolves. The deer population of Unit 2 is declining due to increasing population of wolves on Unit 2. The communities in Unit 2 had a need for deer for food.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

No

PROPOSAL 53

5 AAC 92.051. Discretionary trapping permit conditions and procedures.

Require an online trapping education course for trapping wolves in Unit 2 as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Proposal: Require an online wolf trapping education course for 11 Unit 2 wolf trappers.

What is the issue you would like the board to address and why?

The Sitka Blacktail deer population on Prince of Wales Island (PoW) crashed in 2017, 2018 & 2019. This was due to increasingly degraded forest habitat related to past timber harvest and the increase in the wolf population from 2015-2019. The broad loss of old growth forest habitat in central and north PoW has had a notable reduction on the ability of the landscape to produce and support deer. The value of old growth forest habitat to a healthy deer population can not be overstated. This loss of quality habitat and the consequential increase in the number one predator of deer (wolves) has significantly depleted the PoW deer population.

Between 1985 and 2001 the wolf harvest on PoW ranged from 18-132 wolves and the season length was December 1-March 31 with no closures and no limit.

In 1993, the 1st petition to list the Alexander Archipelago wolves under the Endangered Species Act (ESA) was filed and Alaska Dept. of Fish & Game (ADF&G) defeated it.

In 2011, a 2nd petition was filed and ADF&G countered with a wolf management change in 2015 to avoid the listing.

In 2015, wolves on PoW were managed under a quota system resulting in the following harvest:

2015: 7 total wolves harvested 2016: 30 total wolves harvested 2017: 62 total wolves harvested 2018: 46 total wolves harvested

The 2018 deer season was dramatic for many of us. We saw more wolf scat with deer bones/hair in it than we saw deer. Nearly every mountain, road, beach, etc. had wolf scat on it and our deer were very hard to find.

In 2019, ADF&G changed wolf management to its current format of a variable season length which resulted in the harvest of 164 wolves. This increase in wolf harvest triggered the 3rd petition to list the Alexander Archipelago wolves under the ESA in July of 2020.

With a lot of effort, ADFG defeated the petition again and has continued to manage wolves under its current format of a tight season length to control the take.

Six years ago, the wolf trapping season start date was moved from December 1st to November 15th and there have been conflicts:

- 1) The deer are still rutting and the deer bycatch in snares is a problem.
- 2) Many black bear are still out and the black bear bycatch in snares is a problem as well as bears destroying traps/snares.
- 3) There are lots of hunters in the field in November and many have come across wolves caught in traps/ snares and have taken/shot the wolves and not reported them.
- 4) ADF&G is still conducting their wolf hair board studies until Dec. 5 and the extra human presence in the field negatively affects the wolf trappers.
- 5) There are still waterfowl hunters in the field at this time and the tide flats see more human pressure also influencing the wolves and negatively affecting the trappers and potentially, dogs.

With the potential increase in conflicts, the Craig AC recommends an online education course required by all Unit 2 wolf trappers which is similar to the mountain goat ID quiz required for all Southeast Alaska goat hunters and other ADFG online education courses.

We are working with ADF&G and Alaska Trappers Assoc. on the best ways to implement the proposed educational course.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSAL 54

5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

Require identification tags be attached to traps and snares in Unit 2 as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Require the use of trap or snare name tags on traps or snares used in Unit 2.

What is the issue you would like the board to address and why?

Ownership of traps or snares that are lost or left in the field out of trapping season.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

No.

PROPOSAL 55

5 AAC 92.080. Unlawful methods of taking game; exceptions.

Prohibit the use of night vision and infrared devices for taking furbearers in Unit 2 as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Allow the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers statewide except for Unit 2.

What is the issue you would like the board to address and why?

The statewide use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers will create problems in Unit 2. Unit 2 is predominantly a very densely covered area, the only predator that would be available is wolves. The season for wolf harvest is tightly controlled and this may increase the take beyond ADF&G harvest levels.

Plus allowing the use of electronically enhanced night vision and forward-looking infrared devices would threaten to increase the take of our already declining population of deer.

Enforcement would also be an issue.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Informal discussions with residents of Prince of Wales and Ketchikan.

PROPOSAL 56

5 AAC 92.080. Unlawful methods of taking game; exceptions.

Prohibit the use of night vision and infrared devices for taking furbearers in Unit 2, during state and federal deer seasons as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Allow the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers statewide except for Unit 2 during any open federal or state deer season.

What is the issue you would like the board to address and why?

The statewide use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers will create problems in Unit 2. Unit 2 is predominantly a very densely covered area, the only predator that would be available is wolves. The season for wolf harvest is tightly controlled and this may increase the take beyond ADFG harvest levels.

Plus allowing the use of electronically enhanced night vision and forward-looking infrared devices would threaten to increase the take of our already declining population of deer.

Enforcement would also be an issue.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Informal discussions with residents of Prince of Wales and Ketchikan.