ALASKA DEPARTMENT OF FISH AND GAME

STAFF COMMENTS FOR PROPOSALS 1-4, 6-18, 23-25, 27-30, 34-42, 47, 55-58 and 64-69

SOUTHEAST REGION REGULATIONS PROPOSALS

ALASKA BOARD OF GAME MEETING

WRANGELL, ALASKA

JANUARY 23-27, 2026

The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, January 23-27, 2026 in Wrangell, Alaska, and are prepared to assist the public and board. The stated staff comments should be considered preliminary and subject to change, if or when new information becomes available. Final department positions will be formulated after review of written and oral testimony presented to the board.

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PROPOSAL 1– 5 AAC 92.085. Unlawful methods of taking big game; exceptions. Ban the take of big game between civil twilight of sunset until civil twilight of sunrise the following day in Units 1–5.

PROPOSED BY: East Prince of Wales Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would restrict the taking of big game in Units 1–5 to between the beginning of civil twilight in the morning until the end of civil twilight in the evening.

WHAT ARE THE CURRENT REGULATIONS? Currently there are no regulations dictating at what times big game can be hunted in Units 1–5. **5 AAC 92.100** prohibits the take of waterfowl during the period from sunset to one-half hour before sunrise, statewide.

There are multiple customary and traditional use determinations for big game in Units 1-5.

Species	**Unit**	**Finding**
Black bear	1A, 1B, 1C, 1D, 2, 3, 5	Positive
Brown bear	1A, 1B, 1C, 1D, 4, 5	Positive
Deer	1A, 1B, 1C, 1D, 2, 3, 4, 5	Positive
Goat	1A, 1B, 1C, 1D, 5	Positive
	4	Negative
Moose	1B, 1D, 3, 5	Positive
	1A, 1C	Negative

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Big game could not be harvested from the end of civil twilight in the evening to the beginning of civil twilight in the morning. Hunters would not be able to use natural light (e.g., full moon) to take big game between the end of civil twilight in the evening and the beginning of civil twilight in the morning.

BACKGROUND: Currently, there are no legal shooting hours established in Alaska for big game. State and federal regulations prohibit the take of waterfowl between sunset to one-half hour before sunrise. There are no other legal shooting hours for any other type of game in the state. Legal shooting hours can address safety and ethical issues concerning hunting when

animals are hard to see, it is difficult to know your target and what is beyond it, and difficult to determine the point of impact.

Many states have established legal shooting hours that prohibit hunting between 30 minutes after sunset until 30 minutes before sunrise. While these regulations are typically for big game, some states have different shooting hours for small game or waterfowl. For example, Texas allows hunting for predators at night but only allows taking of big game from a half hour before sunrise to sunset. Similarly, federal waterfowl regulations in Alaska allow hunting from a half hour before sunrise until sunset. States such as Missouri allow for different shooting hours depending on species such as for turkey hunting is allowed a half hour before sunrise to 1pm on public lands, whereas deer hunting may occur a half hour before sunrise until a half hour after sunset. States with regulations on shooting hours choose a centralized location to base shooting time on and publish those times in the regulations. A single location is chosen because the true sunrise and sunset times differ depending on the location in the state.

Civil twilight offers slightly more shooting time compared to the other states that use 30 minutes before and after sunset for legal shooting times. For example, during the opening day of deer season on August 1 for most Southeast communities, civil twilight lasts 50 minutes, compared to the shortest amount of twilight in October with 38 minutes (times based on Wrangell Alaska, Table 1). These times are longer than typical times of 30 minutes before and after sunrise and sunset in other states. However, the lower 48 states are lower in latitude and have a shorter period of civil twilight.

The National Weather Service describes and defines twilight as the following:

> In its most general sense, twilight is the period of time before sunrise and after sunset, in which the atmosphere is partially illuminated by the sun, being neither totally dark or completely lit. However, there are three categories of twilight that are defined by how far the sun is below the horizon. It begins in the morning, or ends in the evening, when the geometric center of the sun is 6 degrees below the horizon. Therefore, morning civil twilight begins when the geometric center of the sun is 6 degrees below the horizon and ends at sunrise. Evening civil twilight begins at sunset and ends when the geometric center of the sun is 6 degrees below the horizon. Under these conditions absent fog or other restrictions, the brightest stars and planets can be seen, the horizon and terrestrial objects can be discerned, and in many cases, artificial lighting is not needed. Civil Twilight is also known as Civil Dawn and Civil Dusk.

Table 1. Civil twilight times for Wrangell Alaska during the 2025 Southeast deer season.

Date	1-Aug	1-Sep	1-Oct	1-Nov	1-Dec	31-Dec
Morning	4:12 am - 5:02 am **50 minutes**	5:25 am - 6:05 am **40 minutes 30 seconds**	6:28 am - 7:06 am **38 minutes**	7:32 am - 8:13 am **41 minutes**	7:27 am - 8:15 am **47 minutes**	7:50 am - 8:39 am **48 minutes 30 seconds**

Evening	9:12 pm - 10:02 pm **50 minutes**	7:56 pm - 8:36 pm **40 minutes 30 seconds**	6:35 pm - 7:12 pm **38 minutes**	5:17 pm - 5:57 pm **41 minutes**	3:27 pm - 4:14 pm **47 minutes**	3:31 pm - 4:20 pm **48 minutes 30 seconds**
Total time	1hr 40min	1hr 21min	1hr 16min	1hr 22min	1hr 34min	1hr 37min

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it is not likely to cause biological concern for big game populations. The authors of this proposal are mainly concerned with the potential for poaching at night, even though current regulations prohibit the use of artificial light to aid in taking of game. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for the subsistence taking of big game in Units 1-5 if the proposal is adopted. If the proposal is adopted, the department also recommends the board establish a single location for which to publish civil twilight hours. This would help alleviate burden to the hunter and the department in attempting to determine on which community to base legal twilight hours. The board may also wish to consider using existing restrictions in regulation to ease hunter confusion, such as one-half hour before sunrise until sunset, even though the length of time allowed to take big game would be shorter than the proposed civil twilight hours.

Sunrise and sunset times change each year, due to the earth's tilt and its elliptical orbit. While the basic pattern repeats annually, the exact times vary slightly from year to year because the earth's orbit is not perfectly circular but rather elliptical, which causes it to move at a varying speed. Because of this, the shooting timetables in the Alaska Migratory Bird Hunting regulations are updated annually. If adopted, the department anticipates the need to publish legal shooting hours, which could take up valuable space in the hunting regulations, lead to the need to print additional pages and educational materials.

COST ANALYSIS: Adoption of this proposal would result in additional costs for the department for outreach and hunting regulation printing.

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PROPOSAL 2 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions. Ban the take of deer between civil twilight of sunset until civil twilight of sunrise the following day in Units 1-5.

PROPOSED BY: East Prince of Wales Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would prohibit the taking of deer in Units 1–5 to between the beginning of civil twilight in the morning until the end of civil twilight in the evening.

WHAT ARE THE CURRENT REGULATIONS? Currently there are no regulations defining what times of day deer can be harvested in Units 1–5.

There are positive customary and traditional use findings for deer in Units 1-5. The Board of Game (board) has determined the amounts reasonably necessary for subsistence as follows:

Units	Finding	ANS
Unit 1A	Positive	5 – 40
Unit 1B	Positive	40 – 50
Unit 1C	Positive	30 – 40
Unit 2	Positive	1,500 – 1,600
Unit 3	Positive	150 – 175
Unit 4	Positive	5,200 – 6,000
Unit 5	Positive	20 – 40

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Deer could not be harvested from the end of civil twilight in the evening to the beginning of civil twilight in the morning. Hunters would not be able to use natural light (e.g., full moon) to take deer in Units 1-5.

BACKGROUND: Currently, there are no legal shooting hours established in Alaska for big game. State and federal regulations prohibit the take of waterfowl between sunset to one-half hour before sunrise. There are no other legal shooting hours for any other type of game in the state. Legal shooting hours can address safety and ethical issues concerning hunting when animals are hard to see, it is difficult to know what is beyond your target, and difficult to determine the point of impact without assistance.

Many states have established legal shooting hours that prohibit hunting between 30 minutes after sunset until 30 minutes before sunrise. While these regulations are typically for big game, some states have different shooting hours for small game and waterfowl. For example, Texas allows hunting for predators at night but only allows taking of big game from a half hour before sunrise to sunset. Similarly, federal waterfowl regulations in Alaska allow hunting from a half hour before sunrise until sunset. States such as Missouri allow for different shooting hours depending on species such as for turkey hunting is allowed a half hour before sunrise to 1pm. on public lands, whereas deer hunting may occur a half hour before sunrise until a half hour after sunset. States with regulations on shooting hours choose a centralized location to base shooting time on and publish those times in the regulations. A single location is chosen because the true sunrise and sunset times differ depending on the location in the state.

Civil twilight offers slightly more shooting time compared to the other states that use 30 minutes before and after sunset for legal shooting times. For example, during the opening day of deer

season on August 1 for most Southeast communities, civil twilight lasts 50 minutes, compared to the shortest amount of twilight in October with 38 minutes (Table 1). These times are longer than typical times of 30 minutes before and after sunrise and sunset in other states. However, the lower 48 states are lower in latitude and have a shorter period of twilight.

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Total time	1hr 40min	1hr 21min	1hr 16min	1hr 22min	1hr 34min	1hr 37min

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as it is not likely to cause biological concern for Southeast deer populations. The authors of this proposal are mainly concerned with the potential for poaching deer at night, even though current regulations prohibit the use of artificial light to aid in taking of game. If adopted, the department recommends the board also establish a single location for which to publish civil twilight hours. This would help alleviate burden to the hunter and the department in attempting to determine on which community to base legal twilight hours. The board may also wish to consider using existing restrictions in regulation to ease hunter confusion, such as one-half hour before sunrise until sunset, even though the length of time allowed to take big game would be shorter than the proposed civil twilight hours.

Adoption of the proposal would not change regulations for other big game animals, which could cause confusion among hunters targeting multiple species of big game at the same time, given new inconsistencies in the regulations caused by adoption of this proposal.

Sunrise and sunset times change each year, due to the earth's tilt and its elliptical orbit. While the basic pattern repeats annually, the exact times vary slightly from year to year because the earth's orbit is not perfectly circular but rather elliptical, which causes it to move at a varying speed. Because of this, each year the shooting timetables in the Alaska Migratory Bird Hunting regulations are updated annually. If adopted, the department anticipates the need to publish legal shooting hours, which could take up valuable space in the hunting regulations, leading to the need to print additional pages and educational materials.

To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses of deer if the proposal is adopted.

COST ANALYSIS: Adoption of this proposal would result in additional costs for the department for outreach and hunting regulations printing.

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PROPOSAL 3 – 5 AAC 92.085 (8). Unlawful methods of taking game; exceptions. Add mountain goats in Units 1 – 5 as an exception to the same-day airborne restriction for taking big game as follows:

5 AAC 92.085 (8) a person who has been airborne may not take or assist in taking big game and a person may not be assisted in taking a big game animal by a person who has been airborne until after 3:00 a.m. following the day in which the flying occurred. Restrictions in this paragraph do not apply to

(A) Taking deer
…
(C) a person flying on a regularly scheduled commercial airline, including a commuter airline;
…
(G) a hunter taking a bear at a bait station with the use of bait or scent lures with a permit issued under 5 AAC 92.044, and if the hunter is at least 300 feet from the airplane at the time of taking;
(H) a hunter taking a black bear in Unit 16 from October 1 through August 9 if the hunter is at least 300 feet from the airplane at the time of taking;
(X) Taking mountain goats in Unit 1 – 5

PROPOSED BY: Ketchikan Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would allow same-day airborne hunting of mountain goats in Units 1–5.

WHAT ARE THE CURRENT REGULATIONS? Currently, hunters must wait to hunt mountain goats until after 3:00 am the following day after they have been airborne. This does not apply to hunters flying on a regularly scheduled commercial airline, including commuter airlines.

There is a positive customary and traditional use (C&T) finding for goats in units 1A, 1B, 1C, 1D, and 5. There is a negative C&T for goats in Unit 4. The Board of Game (board) has determined amounts reasonably necessary for goats as follows: Unit 1A 5–10 goats; Unit 1B 5–10 goats; Unit 1C 25-30 goats; Unit 1D 10–15 goats; Unit 5 1–2 goats.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted, it may result in additional harvest since hunters would be able to take advantage of an extra day of favorable weather conditions. Airplane transport accounts for approximately 25 mountain goats harvested annually across Region 1. Harvest levels would still be subject to quotas for specific hunt areas, and animals being harvested earlier in the season may result in entire hunt areas closing earlier in the season than hunters are currently used to.

BACKGROUND: With few exceptions, the take of big game the same-day a hunter has been airborne has been prohibited for more than 50 years. Some exceptions include the ability for hunters to take deer, bears at bait stations, and more recently black bears in Unit 16 (season dates for these exceptions vary). Hunters must be at least 300 feet from the airplane at the time of taking, to ensure they do not violate the Federal Airborne Hunting Act. More recently, the board has also established additional restrictions for the use of aircraft for scouting and hunting Dall sheep. Additionally, more recently in 2025 the board did not adopt proposals to legalize same-day airborne hunting for brown bears in the Central and Southwest regions of the state.

Over the past decade (RY15 – RY24) an average of 147 (range 105 – 169) mountain goats have been harvested annually in Units 1 – 5. Mountain goat harvest is distributed throughout the region with subunits 1C and 1A composing over 50% of the annual harvest (29% and 23%, respectively), along with Unit 4 (18%), subunit 1B (15%), and subunit 1D (14%). Unit 5A accounts for just 1% of the annual harvest (Figure 1). Mountain goat harvest has not been documented in Units 2 and 3. Guided nonresident hunters annually account for approximately 35% of Region 1's RY2015-RY2024 mountain goat harvest.

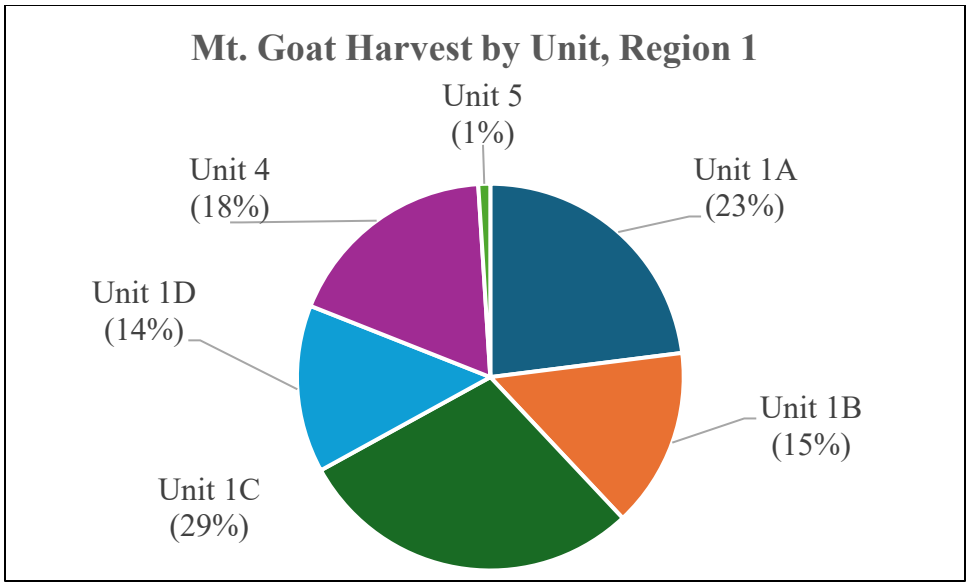

Figure 1. Mountain goat harvest by unit in Region 1, Alaska, RY 2015 – 2024.

Boats are the primary method of transportation for mountain goat hunters in Southeast Alaska. Fifty-six percent of the harvest from RY15 – RY24 was boat-based. Highway vehicles are the second most used transportation at 18%, followed closely by airplanes at 17%. ATV's (5%) and walking (3%) make up the remainder of the transportation methods used (Fig. 2).

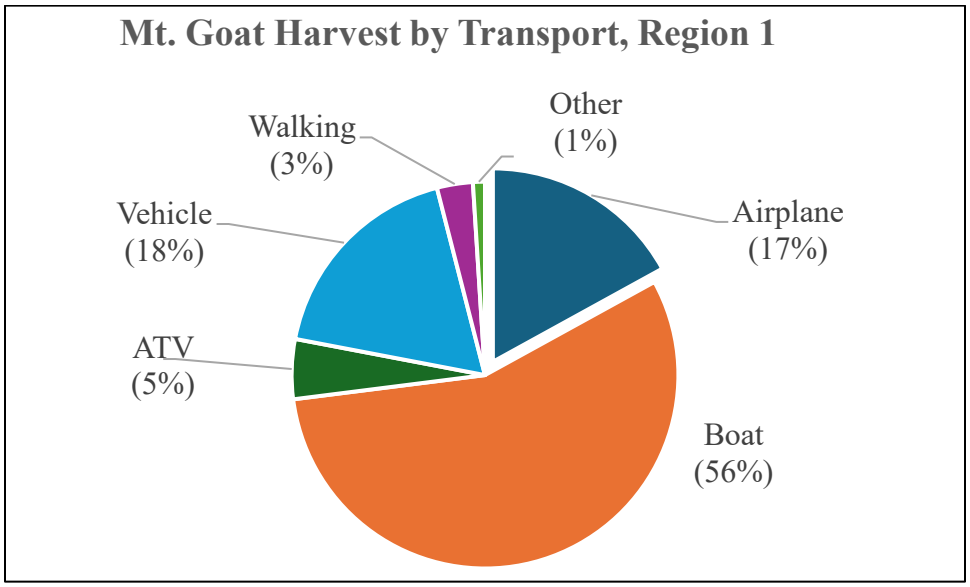

Figure 2. Mountain goat transport types, Region 1, Alaska, RY 2015 – 2024.

Most mountain goat hunting in Southeast Alaska is managed by registration permit. Additionally, there are a few very popular drawing permit hunts. Hunt management typically involves small hunt zones with corresponding quotas based on aerial surveys. Quotas are generally a point system with billies counting as one point and nannies counting as two points. To maximize

opportunity, the department makes great effort to encourage hunters to select taking a billy rather than a nanny. The board and the department have developed extensive education materials to this end and require all goat hunters to take an online orientation course prior to hunting in an effort to improve accuracy of hunter identification of billies versus nannies. Additionally, small and sometimes isolated subpopulations require conservative management to allow maximum opportunity and sustainability. Closing hunt zones by emergency order is common.

The proponent of this proposal cites weather conditions as the main reason to make a same-day airborne exception for mountain goats in Units 1 – 5. Indeed, weather can be a determining factor in the outcome of a goat hunt or if a hunter can even get into the field. Consecutive days with huntable alpine weather can be rare some years. Allowing same-day airborne mountain goat hunting would be a way to increase opportunity by allowing hunters to take advantage of weather breaks to hunt the same day they fly but could result in reallocation of both opportunity and harvest quotas from hunters who do not have access to air transport to those that do. Mountain goat habitat in Southeast Alaska is less conducive to land and shoot practices. Targeting a specific animal from the air and then being able to land nearby is mostly constrained to lakes suitable for landing; such lakes are limited. With few exceptions, both nannies and billies are legal (except nannies with kids) so same-day airborne use is more about taking advantage of good hunting conditions rather than giving a hunter an unfair advantage in pursuing a specific animal, however it will provide an advantage to hunters with access to aircraft in conditions favorable to aircraft use.

However, same-day airborne hunting has the potential to significantly increase interest in use of aircraft and hunter efficiency. The department is concerned about hunt zones with small quotas, because some zones may close sooner than they have in the past. As a result, allowing same-day airborne hunting could result in hunters utilizing other transport types being out competed by hunters utilizing aircraft.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding the allocative aspects of hunters' ability to use airplanes versus other transportation methods. Adoption of this proposal has the potential to greatly reduce season length in many areas due to goats being harvested much more quickly than under the current management structure. Same-day airborne hunting is not anticipated to cause a conservation concern for mountain goats because the department will continue to sustainably manage via conservative hunt zone quotas and emergency orders. Methods and means are the board's discretion and the department is neutral regarding the allocation of the resource between those hunters using airplanes and versus other transportation methods. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

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PROPOSAL 4 – 5 AAC 92.130. Restrictions to bag limit. Add mountain goats in Units 1 – 5 to the list of animals that when wounded, count against that person's bag limit for the regulatory year as follows:

5 AAC 92.130. Restrictions to bag limit.

(f) In Units 1 – 5 and Unit 8, a black or brown bear wounded by a person counts against that person's bag limit for the regulatory year in which the bear is taken. However, in Units 1 – 5 and Unit 8, a brown bear wounded by a person does not count against that person's one bear every four regulatory years bag limit established in 5 AAC 92.132.

(g) In Unit 8, an elk wounded by a person counts against that person's bag limit for the regulatory year in which the elk was taken.

(X) In Units 1 – 5, a mountain goat wounded by a person counts against that person's bag limit for the regulatory year in which the mountain goat was taken.

(h) In this section, "wounded" means there is sign of blood or other sign that the animal has been hit by a hunting projectile.

PROPOSED BY: David Summers

WHAT WOULD THE PROPOSAL DO? This proposal would require that mountain goats in Units 1 – 5, if wounded and not recovered, count against that person's annual bag limit.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.130. Restrictions to bag limit

(a) Unless otherwise provided in 5 AAC 84 - 5 AAC 92, no person may take a species of game in any unit or portion of a unit if that person's total statewide take of that species already equals or exceeds the bag limit for that species in that unit or portion of a unit, except as provided in (d) of this section.

(b) The bag limit specified for a subsistence season for a species and the bag limit set for a general season for the same species are not separate and distinct. This means that a person who has taken the bag limit for a particular species under a subsistence season may not after that take any additional animals of that species under the bag limit specified for a general season.

(c) A bag limit applies to a regulatory year unless another time period is specified in the bag limit.

(d) The bag limit specified for a trapping season for a species and the bag limit set for a hunting season for the same species are separate and distinct. This means that a person who has taken a bag limit for a particular species under a trapping season may take additional animals under the bag limit specified for a hunting season, or vice versa.

(e) A hunter who is under 10 years of age may take big game only under the direct, immediate supervision of a licensed hunter who is at least 18 years of age. The supervising hunter is responsible for ensuring that all legal requirements are met. The big game animal taken will count against the supervising hunter's bag limit. This section does not relieve an individual from complying with big game tag requirements, but does require a supervising hunter to validate the hunter's harvest ticket, or permit, in accordance with 5 AAC 92.010, immediately following the taking of big game under this section.

(f) In Units 1 - 5 and Unit 8, a black or brown bear wounded by a person counts against that person's bag limit for the regulatory year in which the bear is taken. However, in Units 1 - 5 and Unit 8, a brown bear wounded by a person does not count against that person's one bear every four regulatory years bag limit established in 5 AAC 92.132.

(g) In Unit 8, an elk wounded by a person counts against that person's bag limit for the regulatory year in which the elk is taken.

(h) In this section, "wounded" means there is sign of blood or other sign that the animal has been hit by a hunting projectile.

(i) A big game animal, except deer in an area where the bag limit is one, taken under a youth hunt, will count as the bag limit of both the child and the supervising hunter who accompanies the child; only the child may shoot the big game animal, except that the accompanying adult may shoot the animal only to prevent the animal from escaping after having been wounded by the child. The supervising hunter is responsible for ensuring that all legal requirements are met.

There is a positive customary and traditional use (C&T) finding for goats in units 1A, 1B, 1C, 1D, and 5. There is a negative C&T for goats in Unit 4. The board has determined amounts reasonably necessary for goats as follows: Unit 1A 5–10 goats; Unit 1B 5–10 goats; Unit 1C 25-30 goats; Unit 1D 10–15 goats; and Unit 5 1–2 goats.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal, if adopted, would add mountain goats in Units 1 – 5 to 5 AAC 92.130 as a species that, when wounded and not recovered, would count toward the hunter's annual bag limit. A hunter that wounds a mountain goat would not be able to continue hunting for another mountain goat, unless hunting in an area with a bag limit greater than 1.

BACKGROUND: Over the past decade (regulatory years (RY) 15 – RY24) an average of 147 (range 105 – 169) mountain goats have been harvested annually in Units 1–5. Mountain goat harvest is distributed throughout the region with subunits 1C and 1A composing over 50% of the annual harvest (29% and 23% respectively), followed by GMU 4 (18%), subunit 1B (15%), and subunit 1D (14%). Unit 5A accounts for just 1% of the annual harvest (Figure 1). Mountain goats do not inhabit Units 2 and 3. Guided nonresident hunters annually account for approximately 35% of Region 1's RY2015-RY2024 mountain goat harvest.

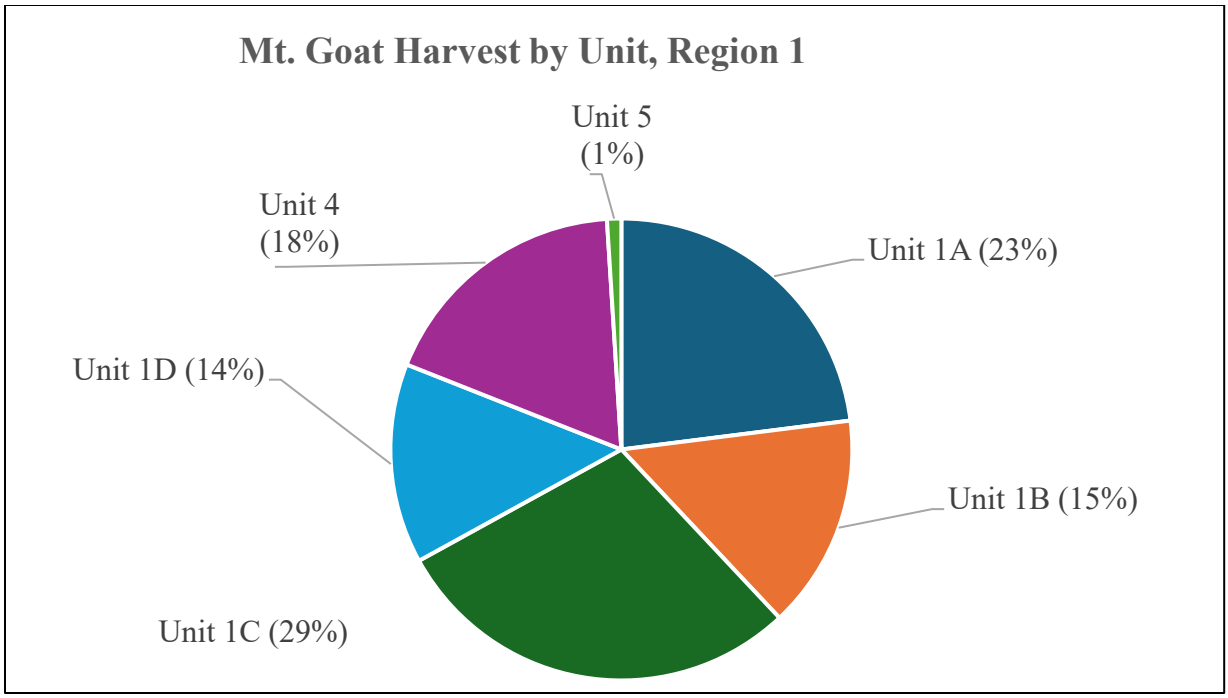

Fig. 1. Mountain goat harvest by Unit in Region 1, Alaska, regulatory years 2015 – 2024.

Similar proposals to expand wounding loss regulations to other species in other areas of the state have failed, with one reason being the negative impact on subsistence hunters. Beginning with the RY2005 season, brown bears in Southeast Alaska were counted as part of the annual bag limit if wounded and not recovered (all Units in Southeast outside of the Nonsubsistence Areas have a positive C&T finding for brown bear). Elk in Unit 8 (negative C&T finding) received that same consideration beginning with the RY2011 season.

The department provides extensive educational materials to promote quick and humane kills for all game (e.g. brochures, short videos, hunter education and animal identification). These efforts are intended to encourage good hunter judgement, give hunters confidence when the opportunity to take big game is presented, and promote ethical standards of hunting. Technological advances, particularly with regard to long distance shooting have in some circumstances increased hunter efficiency but have also likely led to avoidable wounding loss scenarios. Requiring unrecovered goats to count toward a hunter's bag limit could encourage hunters to give more consideration to responsible shot selection. The department is also conscious of the fact that sometimes factors beyond the hunter's control can affect successfully recovering big game.

Mountain goats, perhaps more than any other North American big game, are susceptible to wounding loss. These tough, thick-skinned animals inhabit extremely rugged terrain and will seek steep escape cover when shot. Unfortunately, mountain goats are shot each year that die in terrain too dangerous for the hunter to recover. Currently, a hunter who wounds a mountain goat is able to continue hunting and take another goat. Although reporting unrecovered goats is not required, some hunters do self-report. In Unit 4 for example, on average 1 goat each season is

reported as unrecoverable. Managers report similar numbers in other units. However, the actual extent of mountain goat wounding loss is unknown. Reported lost goats are counted toward a hunt zone's quota.

Most mountain goat hunting in Southeast Alaska is managed by registration permit. Additionally, there are a few very popular drawing permit hunts. Hunt management typically involves small hunt zones with corresponding quotas based on recent aerial surveys. Quotas are generally a point system with billies counting as one point and nannies counting as 2 points. To offer maximum opportunity, rather than closing them, some zones may have very small quotas of 1–3 goat points, rather than closing them entirely, to provide some hunting opportunity. To maximize opportunity where possible, the department makes great efforts to encourage hunters to select taking a billy rather than a nanny. The board and the department have developed extensive education materials to this end and require all goat hunters to take an online orientation course prior to hunting in an effort to improve accuracy of hunter identification of billies versus nannies. Additionally, small and sometimes isolated subpopulations require conservative management to allow maximum opportunity and sustainability. Closing hunt zones by emergency order is common. Because mountain goat populations are susceptible to over-harvest, requiring wounded and lost goats to count toward a hunter's bag limit could help area biologists with hunt management, particularly in zones with small quotas, by providing accurate mortality data in a timely manner through reporting requirements.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal, though it does encourage ethical hunting practices. The department can sustainably manage mountain goats under current reporting regulations. Adoption of this proposal could provide some benefit to mountain goat conservation, particularly with regard to small, isolated sub-populations, if managers had better information about goat wounding loss and the ability to count unrecovered goats toward zone quotas. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses of mountain goat if the proposal is adopted.

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

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Proposal 5

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PROPOSAL 6 – 5 AAC 85.056. Hunting seasons and bag limits for wolf. Align the hunting season for wolves in Unit 1 to August 1 – May 31.

PROPOSED BY: Jon Geary

WHAT WOULD THE PROPOSAL DO? The wolf hunting season in units 1B remainder, 1C, and 1D would change from August 1 – April 30 to August 1 – May 31.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(1)		
Unit 1(A), Unit 1(B), that portion south of Bradfield Canal and the east fork of the Bradfield River, and Unit 3 5 wolves	Aug. 1 – May 31 (General hunt only)	Aug. 1 – May 31
Remainder of Unit 1(B), Units 1(C) and 1(D), and Units 4 and 5 5 wolves	Aug. 1 – Apr. 30 (General hunt only)	Aug. 1 – Apr. 30

Wolves have a positive customary and traditional use finding in units 1A, 1B, and 1C and the Board of Game (board) has determined an amount reasonably necessary for subsistence of 90% of the harvestable surplus.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? There would be an additional one month of hunting opportunity for wolves in units 1B remainder, 1C, and 1D. Wolf harvest could slightly increase with the longer season, extend into denning and pup dependency periods.

BACKGROUND: The wolf hunting season was aligned across Unit 1 with a season from Aug. 1 – Apr. 30 until the board's 2010 meeting. During that meeting, the board increased the season

length to Aug. 1 – May 31 for Unit 1A, Unit 1B south of Bradfield Canal and the east fork of the Bradfield River, and Unit 3. Since 2010, when the wolf hunting season was extended hunting season for units 1A and a portion of 1B, harvest has averaged 5 wolves per regulatory year (RY) in the area; during the month of May, harvest averaged 1 wolf per year from 2011 to 2024. The average harvest of wolves with a firearm in Unit 1 is low, averaging 12 wolves per year from RY2010–RY2024 (Table 1). Wolves are more commonly harvested with traps.

This is a small increase in the total annual wolf harvest in Unit 1 which averaged 68 from RY2010-RY2024. Wolves are highly productive with relatively large annual litter sizes from each pack. Studies indicate that wolves in productive areas can withstand a total human-caused mortality of up to 30% and maintain their population. The department does not have a recent population estimate for Unit 1; however, harvest has remained stable throughout the last decade with no signs of decline in Unit 1.

Harvest during the month of May is likely opportunistic rather than hunters specifically targeting wolves. Wolf pelts are typically prime from late November to January or February. However, some hunters may be interested in harvesting wolves for trophy value. Hunting guides taking clients out for guided black or brown bear hunts during the month of May have the opportunity in units 1A and a portion of 1B to harvest a wolf. Nonresidents that do not have the opportunity to harvest wolves in their home state or country may be interested in harvesting a wolf regardless of how prime the pelt is.

Table 1. Wolves harvested with firearm by Game Management Unit for regulatory years 2010-2024.

Regulatory Year	Unit 1A	Unit 1B	Unit 1C	Unit 1D	Total
2010	4	0	5	5	14
2011	5	5	5	2	17
2012	2	5	3	8	18
2013	5	2	7	3	17
2014	5	1	5	2	13
2015	7	1	3	1	12
2016	3	1	3	2	9
2017	11	1	5	0	17
2018	4	3	4	1	12
2019	1	2	7	1	11
2020	4	4	3	2	13
2021	4	3	4	0	11
2022	4	2	2	1	9
2023	1	3	2	0	6
2024	0	2	3	3	8
Average	4	2	4	1	11

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal as it is not likely to cause biological concern for the wolf population in Unit 1. Wolf harvest is not likely to change much with the additional month of opportunity in units 1B remainder, 1C, and 1D. If this proposal were adopted, the total annual harvest is predicted to increase by only 2-3 wolves, resulting in an estimated total harvest of 13-14 wolves annually. The wolf trapping season in Unit 1 currently closes on April 30.

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

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PROPOSAL 7 – 5 AAC 85.056. Hunting seasons and bag limits for wolf. Align the hunting season for wolves in units 1A, 1B, and 1C to August 1 – May 31.

PROPOSED BY: Jesse Ross

WHAT WOULD THE PROPOSAL DO? The wolf hunting season in units 1B remainder and 1C would increase from August 1 – April 30 to August 1 – May 31.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limits	**Resident Open Season (Subsistence and General Hunts)**	**Nonresident Open Season**
(1)		
Unit 1(A), Unit 1(B), that portion south of Bradfield Canal and the east fork of the Bradfield River, and Unit 3 5 wolves	Aug. 1 – May 31 (General hunt only)	Aug. 1 – May 31
Remainder of Unit 1(B), Units 1(C) and 1(D), and Units 4 and 5 5 wolves	Aug. 1 – Apr. 30 (General hunt only)	Aug. 1 – Apr. 30

Wolves have a positive customary and traditional use finding in units 1A, 1B, and 1C and the Board of Game (board) has determined an amount reasonably necessary for subsistence of 90% of the harvestable surplus.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? There would be an additional 1 month of hunting opportunity for wolves in units 1B remainder and 1C. Wolf harvest could slightly increase with the longer season and hunting season will extend further in denning and pup dependency periods..

BACKGROUND: The wolf hunting season was aligned across Unit 1 with a season from Aug. 1 – Apr. 30 until the board's 2010 meeting. During that meeting, the board increased the season length to Aug. 1 – May 31 for Unit 1A, Unit 1B south of Bradfield Canal and the east fork of the Bradfield River, and Unit 3. Since 2010, when the wolf hunting season was extended hunting season for units 1A and a portion of 1B, harvest has averaged 5 wolves per regulatory year (RY) in the area; during the month of May, harvest averaged 1 wolf per year from 2011 to 2024. The average harvest of wolves with a firearm in Unit 1 is low, averaging 12 wolves per year from RY2010–RY2024 (Table 1). Wolves are more commonly harvested with traps.

This is a small potential increase in the total annual wolf harvest which averaged 16 in Units 1B and 1C from RY2010–RY2024. Wolves are highly productive with relatively large annual litter sizes from each pack. Studies indicate that wolves in productive areas can withstand a total human-caused mortality of up to 30% and maintain their population. The department does not have a recent population estimate for Unit 1; however, harvest has remained stable throughout the last decade with no signs of decline in Units 1B and 1C.

Harvest during the month of May is likely opportunistic rather than hunters specifically targeting wolves. Wolf pelts are typically prime from late November to January or February. However, some hunters may be interested in harvesting wolves for trophy value. Hunting guides taking clients out for guided black or brown bear hunts during the month of May have the opportunity in units 1A and a portion of 1B to harvest a wolf. Non-residents that do not have the opportunity to harvest wolves in their home state or country may be interested in harvesting a wolf regardless of how prime the pelt is.

Table 1. Wolves harvested with firearm by Game Management Unit for regulatory years 2010-2024.

Regulatory Year	Unit 1A	Unit 1B	Unit 1C	Unit 1D	Total
2010	4	0	5	5	14
2011	5	5	5	2	17
2012	2	5	3	8	18
2013	5	2	7	3	17
2014	5	1	5	2	13
2015	7	1	3	1	12

2016	3	1	3	2	9
2017	11	1	5	0	17
2018	4	3	4	1	12
2019	1	2	7	1	11
2020	4	4	3	2	13
2021	4	3	4	0	11
2022	4	2	2	1	9
2023	1	3	2	0	6
2024	0	2	3	3	8
Average	4	2	4	1	11

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal as it is not likely to cause biological concern for the wolf population in units 1B remainder and 1C. Additional harvest is expected to be minimal as total average hunter harvest for each unit is already low. Added to the current average of 6 wolves harvested with a hunting license annually in Unit 1B and 1C, the harvest with a hunting license is predicted to increase by 2-3 wolves, resulting in an estimated total harvest of 7 to 8 wolves total from those units. The potentially small additional harvest is not likely to impact the population.

Currently, Unit 1A and a portion of Unit 1B wolf hunting season is not aligned with the trapping season, as the hunting season extends a month longer than the trapping season. The wolf trapping season in all of Unit 1 currently closes on April 30. This proposal would extend that misalignment throughout Unit 1.

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

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PROPOSAL 8 – 5 AAC 85.XXX. Hunting seasons and bag limits for cougar/mountain lion. Open a hunting season for mountain lion in units 1-5.

PROPOSED BY: Wrangell Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would create a mountain lion season in units 1, 2, 3, 4, and 5, with a bag limit of 1, excluding kittens and females with kittens, with a season of August 1-June 15, and the hunt would be open to residents and nonresidents. The skull and hide would be required to be salvaged, and the skull and hide would be required to be presented to the department within 15 days of take for sealing.

WHAT ARE THE CURRENT REGULATIONS? Currently there is no open season for mountain lions in Alaska.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted it will be legal to harvest mountain lions in units 1-5.

BACKGROUND: Mountain lions (*Puma concolor*) are a widespread large carnivore with a range that extends from British Colombia south through Mexico and across most of South America. Mountain lions are considered sparse in the northern half of British Colombia, where there is no open mountain lion hunting season.

Since 1989 there have been five documented observations of mountain lions in Alaska. All but one of the documented observations occurred in Unit 3. In 1989 a young male mountain lion was shot on the east side of Wrangell Island. Nine years later (1998) a mountain lion was photographed at Meyers Chuck on the Cleveland Peninsula in Unit 1B. That same year a mountain lion was captured in a wolf snare in Totem Bay on Kupreanof Island. In June 2024 a young male mountain lion was killed on Wrangell Island near Thom's Point and an adult male mountain lion was captured in a wolf snare on Kuiu Island in April 2025. All four of the mountain lions killed in Unit 3 have been males, 3 of which were young males.

The department has received unconfirmed observations of mountain lions or their tracks for many years Most of these unconfirmed observations have originated from Wrangell Island. No mountain lion images have been captured by trail cameras operated by the department in Unit 3, and no images have been reported from trail cameras operated by the public. This potentially indicates that the population is at extremely low density and the lions seen or taken in Southeast are young dispersing males.

The department conducts no management activities for mountain lions other than documentation of rare/occasional observations.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. However, there is no harvestable surplus of mountain lions in the region as a breeding population has not appeared to have established in Alaska.

COST ANALYSIS: Adoption of this proposal would result in some costs for the department as sealing materials and methods are developed to capture harvest data necessary to track harvest.

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PROPOSAL 9 – 5 AAC 84.270. Furbearer trapping, and **5 AAC 85.XXX. Hunting seasons and bag limits for cougar/mountain lion.** Open a hunting season for mountain lion in units 1-5.

PROPOSED BY: Caleb Martin

WHAT WOULD THE PROPOSAL DO? This proposal would create hunting and trapping seasons for mountain lion in units 1, 2, 3, 4, and 5, with a year-round season and a bag limit of one, and both hunting and trapping seasons would be open to residents and nonresidents.

WHAT ARE THE CURRENT REGULATIONS? Currently there is no hunting or trapping season for mountain lions in Alaska.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, it will be legal to harvest mountain lions in units 1-5 by hunting and trapping.

BACKGROUND: Mountain lions (*Puma concolor*) are a widespread large carnivore with a range that extends from British Colombia south through Mexico and across most of South America. Mountain lions are considered sparse in the northern half of British Colombia, where there is no open mountain lion hunting season.

Since 1989 there have been 5 documented observations of mountain lions in Alaska. All but one of the documented observations occurred in Unit 3. In 1989 a young male mountain lion was shot on the east side of Wrangell Island. Nine years later (1998) a mountain lion was photographed at Meyers Chuck on the Cleveland Peninsula in Unit 1B. That same year a mountain lion was captured in a wolf snare in Totem Bay on Kupreanof Island. In June 2024 a young male mountain lion was killed on Wrangell Island near Thom's Point. An adult male mountain lion was captured in a wolf snare on Kuiu Island in April 2025. All 4 of the mountain lions killed in GMU 3 have been males, 3 of which were young males.

The department has received unconfirmed observations of mountain lions or their tracks for many years. Most of these unconfirmed observations have originated from Wrangell Island. No mountain lion images have been captured by remote game cameras operated by the department in Unit 3, and no images have been reported from game cameras operated by the public.

The department conducts no management activities for mountain lions other than documentation of rare/occasional observations.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. However, there is no harvestable surplus of mountain lions in the region as a breeding population is not established in Alaska. The board may want to consider reporting or sealing requirements, as in proposal 8, if the intent is to allow for the take of mountain lion. Also, if the goal is to allow the population to establish and maintain a hunt, and not opportunistic take for the occasional animal, the board may want to consider a change in the bag limit to protect kittens and females with kittens as indicated in proposal 8.

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

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PROPOSAL 10 – 5 AAC 92.170. Sealing of marten, fisher, lynx, beaver, otter, wolf, and wolverine. Remove the sealing requirement for beaver in Units 1 – 5 as follows:

5 AAC 92.170. Sealing of marten, fisher, lynx [beaver], otter, wolf, and wolverine.

PROPOSED BY: Nicholas Orr

WHAT WOULD THE PROPOSAL DO? This proposal would remove the sealing requirement for beaver in Units 1 – 5.

WHAT ARE THE CURRENT REGULATIONS?

Area	Open Season	Limit
Units 1 - 5	Nov 10 – May 15	No limit

Beaver must be sealed within 30 days after the close of the season.

There is a positive customary and traditional use finding for furbearers, including beaver, in Units 1 –5 and an amount reasonably necessary for subsistence of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Trappers would no longer be required to seal beavers in Units 1 – 5.

BACKGROUND: Beaver harvest in Southeast Alaska is highly variable from year to year. Over the past decade (regulatory year (RY) 15 – RY24) an average of 225 (range: 100 – 325) beavers were harvested in Southeast Alaska annually. Unit 2 comprises 30% of the annual harvest followed by Subunits 1A and 1C (both 19%). Unlike big game harvest data which can be used as a proxy for intensive surveys as an indicator of population trends, harvest numbers for furbearers are a function of pelt prices, costs associated with trapping, and trapper interest. Also, the participation of just 1 or 2 skilled trappers can have a significant impact on overall harvest numbers. The Board of Game has recognized abundant beaver populations in the region by liberalizing regulations over the past decade (allowing the use of firearms in 2015 and extending the season in 2019). Currently in Southeast Alaska, trappers are not required to seal mink, weasel, coyotes, fox, marmot, muskrat and squirrels. There is currently no sealing requirement for beaver in the Interior region (Units 12, 19-21, 24, 25, 26B, and 26C) and the Arctic/Western region (Units 18-22, 23, 26A).

Sealing and the annual trapper questionnaire are currently the only tools the department has to track beaver populations. Although overall an uncertain indicator of population trends, there are some specific circumstances where sealing has been informative. For example, documenting population expansion in Subunit 5A and range expansion into the Chilkat River valley in Subunit 1D may not have been documented if sealing was not required.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal. There is currently no conservation concern for beavers and they can be sustainably managed with or without sealing requirements. If adopted, the department will continue to rely on responses to the trapper questionnaire to monitor trends in beaver harvest.

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

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PROPOSAL 11 – 5 AAC 92.180. Unlawful methods of taking game; exceptions. Remove the prohibition for using cameras that can communicate wirelessly for taking furbearers in Units 1 – 5.

PROPOSED BY: Nicholas Orr

WHAT WOULD THE PROPOSAL DO? This proposal would allow trappers to use remote cameras that communicate wirelessly to a trapper's devices to aid with trapping in Units 1 – 5.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.080. Unlawful methods of taking game; exceptions. The following methods of taking game are prohibited:

(7) with the aid of

(H) any camera or other sensory device that can send messages through wireless communication;

There is a positive customary and traditional use finding for furbearers in Units 1–5 and an amount reasonably necessary for subsistence of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Trappers would be allowed to use cameras that can communicate remotely to aid in the taking of furbearers. It is uncertain how much, or if any, advantage this may provide a trapper. There may be an advantage to the trapper if an animal is detected and the trapper is able to get to the site expeditiously.

BACKGROUND: Technology continues to advance rapidly, and hunters and trappers are gaining access to technology that was previously unavailable. At the Statewide Board of Game (board) meeting in November 2017, the board addressed Proposal 13 from the Alaska Wildlife Troopers (AWT) seeking clarification of the legal use of cellular and satellite telephones. A specific example of technological advances cited by AWT in that 2017 proposal was the use of game cameras placed in the field which can send photographs via text or email to cellular phones in real time. After lengthy discussion, the board passed amended language for 5 AAC 92.080 that includes the prohibition for taking game with the aid of any camera or other sensory device that

can send messages through wireless communication. However, during that 2017 meeting, the discussion revolved entirely around big game and trapping was not specifically discussed. The specific regulation that addresses trapping (5 AAC 92.095) incorporates 5 AAC 92.080 by reference. The proponent of this proposal argues that the restriction for using cellular game cameras for trapping comes directly from hunting regulations and is not a necessary prohibition for trappers.

Cellular game cameras could result in higher catch rates for trappers, by enhancing efficiency. Trappers could bypass sets that do not have an animal. They could more quickly re-set traps that either have animals or had misses. They could also use cellular cameras to learn what improvements need to be made to a set to be more successful in a more timely manner. Cellular game cameras could also increase trapper safety because they would not have to risk checking traps in inclement weather if they knew they did not have a catch. However, there is some potential for abuse if trappers used cellular cameras to locate big game under the guise of using them for trapping. Similar concerns were raised at the most recent Statewide board meeting when the board voted to approve the use of night vision and forward-looking infrared (FLIR) devices for trapping.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this method and means proposal. Allowing trappers to use cellular game cameras is unlikely to result in a conservation concern for any furbearer species in Southeast Alaska. Furbearers can be sustainably managed whether cellular game cameras are, or are not, allowed. If the board is interested in adopting this proposal the department recommends deferring this proposal to the next statewide meeting to have consistency in trapping regulations statewide.

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

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PROPOSAL 12 – 5 AAC 92.080. Unlawful methods of taking game: exceptions. Prohibit the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Units 1–5.

PROPOSED BY: Ellen Hannen and Kurt Whitehead

WHAT WOULD THE PROPOSAL DO? This proposal would prohibit the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Units 1–5.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.080. Unlawful methods of taking game; exceptions. The following methods of taking game area prohibited:

(7) with the aid of

…

(E) electronically enhanced night vision, except that electronically enhanced night vision may be used for taking furbearers;

(F) any forward looking infrared device, except that a forward looking infrared device may be used for taking furbearers;

There is a positive customary and traditional use finding for furbearers in Units 1–5 and an amount reasonably necessary for subsistence of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would prohibit the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Units 1–5.

BACKGROUND: At the 2016 Statewide Board of Game (board) meeting the board adopted a proposal submitted by the Alaska Wildlife Troopers that prohibited the use of forward-looking infrared devices (FLIRs) for taking game. Prior to the board adopting the proposal in 2016, only night vision scopes were prohibited. At the 2024 board meeting in Fairbanks, the board adopted Proposal 52 which allowed the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C). The next year, the board adopted Proposal 126 which allowed the take of furbearers with enhanced night vision and forward-looking infrared devices statewide.

FLIR technology detects infrared radiation emitted from a heat source by using thermal or infrared technology to create a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. FLIR technology is available in handheld cameras and cameras that can attach to a smartphone, goggles, or rifle scopes. Night vision devices and FLIR devices provide aid to trappers allowing identification of and locating animals from far away through barriers such as snow and darkness.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it introduces regulatory complexity in the form of inconsistent regulations, and the department is supportive of the use of this technology for trapping. If adopted, this proposal would create the only unit in the state that does not allow the take of furbearers using night vision or FLIR. While some residents have expressed concerns with poaching occurring in areas with higher densities

of roads, this concern is not specific to the use of FLIRs. There is potential to abuse the use of FLIR or night vision to aid in the taking of big game, and the department relies on the Alaska Wildlife Troopers observations to quantify how often this occurs. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for the subsistence use of furbearers if the proposal is adopted.

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

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PROPOSAL 13 – 5 AAC 92.080. Unlawful methods of taking game; exceptions. Prohibit the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Units 1–5 during any open deer season.

PROPOSED BY: Ellen Hannen and Kurt Whitehead

WHAT WOULD THE PROPOSAL DO? This proposal would prohibit the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Units 1–5 during any open deer season.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.080. Unlawful methods of taking game; exceptions. The following methods of taking game area prohibited:

(7) with the aid of

…

(E) electronically enhanced night vision, except that electronically enhanced night vision may be used for taking furbearers;

(F) any forward looking infrared device, except that a forward looking infrared device may be used for taking furbearers;

There is a positive customary and traditional use finding for furbearers in Units 1–5 and an amount reasonably necessary for subsistence of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would prohibit the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Units 1–5 during any state or federal deer season.

BACKGROUND: At the 2016 Statewide Board of Game (board) meeting the board adopted a proposal submitted by the Alaska Wildlife Troopers that prohibited the use of forward-looking infrared devices (FLIRs) for taking game. Prior to the board adopting the proposal in 2016, only night vision scopes were prohibited. At the 2024 BOG meeting in Fairbanks, the board adopted Proposal 52 allowing the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C). The next year, the board adopted Proposal 126 which allowed the take of furbearers with enhanced night vision and forward-looking infrared devices statewide.

A FLIR detects infrared radiation emitted from a heat source by using thermal or infrared technology to create a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. FLIR technology is available in handheld cameras and cameras that can be attached to a smart phone, goggles, or rifle scopes. Night vision devices and FLIR devices provide aid to trappers allowing identification of and locating animals from far away through barriers such as snow and darkness.

The deer seasons differ between state and federal regulations, resident and nonresidents, and locations within units. Table 1 depicts the annual deer seasons across state and federal seasons in units 1–5.

Table 1. State and federal deer seasons in Southeast Alaska Units 1-5.

Manager	Unit	Area	Open Season
State	1A	Cleveland Peninsula south of the divide between Yes Bay and Santa Anna Inlet	Aug. 1 - Nov. 30
State	1A	Unit 1A remainder	Aug. 1 - Dec. 31
Federal	1A	Unit 1A	Aug. 1 - Dec. 31
State	1B	Unit 1B	Aug. 1 - Dec. 31
Federal	1B	Unit 1B	Aug. 1 - Dec. 31
State	1C	Douglas Island	Aug. 1 - Dec. 31
State	1C	Lincoln, Shelter, and Sullivan Islands	Aug. 1 - Dec. 31
State	1C	Unit 1C remainder	Aug. 1 - Dec. 31
Federal	1C	Unit 1C	Aug. 1 - Dec. 31
State	2	Unit 2	Aug. 1 - Dec. 31
Federal	2	Unit 2	Jul. 24 - Jan. 31
State	3	Petersburg Management Area	Aug. 1 - Dec. 15
State	3	Remainder of Mitkof, Woewodski, and Butterworth Islands	Oct. 1 - Nov. 7

State	3	That portion of Kupreanof Island on the Lindenberg Peninsula east of the Portage Bay-Duncan Canal Portage	Oct. 1 - Nov. 7
State	3	Unit 3 remainder	Aug. 1 - Nov. 30
Federal	3	Mitkof, Woewodski, Butterworth Islands, and that portion of Kupreanof Island on the Lindenberg Peninsula east of the Portage Bay - Duncan Canal Portage	Oct. 1 - Nov. 7
Federal	3	Unit 3 remainder	Aug. 1 - Nov. 30
Federal	3	Unit 3 remainder	Dec. 1 - Dec. 31
			Season to be announced
State	4	Unit 4	Aug. 1 - Dec. 31
Federal	4	Unit 4	Aug. 1 - Jan. 31
State	5A	Unit 5A	Aug. 15 - Nov. 30
State	5B	Unit 5B	No open season
Federal	5A	Unit 5A	Nov. 1 - Nov. 30
Federal	5B	Unit 5B	No open season

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it introduces regulatory complexity in the form of inconsistent regulations, and the department is supportive of the use of this technology for trapping. If adopted, this proposal would create the only unit in the state that does not allow the take of furbearers using night vision or FLIR. While some residents have expressed concerns with poaching occurring in areas with higher densities of roads, this concern is not specific to the use of FLIRs. There is potential to abuse the use of FLIR or night vision to aid in the taking of big game, and the department relies on the Alaska Wildlife Troopers observations to quantify how often this occurs. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for the subsistence use of furbearers if the proposal is adopted.

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

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PROPOSAL 14 - 5 AAC 84.270(15). Furbearer Trapping. Increase the fisher bag limit from 1 to 3 per regulatory year in Units 1 – 5.

PROPOSED BY: Reuben Glaves

WHAT WOULD THE PROPOSAL DO?

This proposal would increase the bag limit for fishers in Units 1 – 5 from 1 to 3 per regulatory year.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limit	**Open Season**
Units 1 – 5	Dec. 1 – Feb. 15
1 Fisher	

There is a positive customary and traditional use finding for furbearers in Units 1 – 5 and an amount reasonably necessary for subsistence of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Residents and nonresidents could retain up to 3 fishers per regulatory year which, if adopted, would be 2 additional fishers per year. Currently, trappers must surrender any fisher taken above the bag limit of one fisher per year.

BACKGROUND: The first fisher harvested in Southeast Alaska was taken on the Juneau road system in regulatory year (RY) 1996. From RY1996 to RY2011, 6 fishers were reported harvested in Unit 1C, near Juneau, incidental to marten and wolverine trapping. Those fishers were surrendered to the department because there was no trapping season at that time.

Proposals to open a fisher trapping season were submitted for the 2010 and 2012 Board of Game (board) cycles. At the time, the department had concerns about the potential for unsustainable fisher harvest if a season were opened. However, trappers were already harvesting fishers as incidental take in marten and wolverine sets. In 2012, the board adopted a proposal for a fisher season with a bag limit of 1 fisher. The department supported the proposal because it would allow the department to obtain information on distribution and sex from trapper-caught animals and limited harvest to 1 fisher. This would also allow the department to use the carcasses to gather genetic material and track sex and age classes, and reproductive information from the carcasses of adult females.

The first trapping season opened during RY13 and a total of 33 fishers have been reported harvested from RY13–RY24 (Figure 1). Of those, 32 (17 females and 15 males) were reported harvested from Unit 1C; only 1 fisher harvest has been reported outside of Unit 1C and that was a male harvested in RY23 from Unit 1D. An additional female was killed by a car in RY22 on

Glacier Highway in Juneau. About one-third of the reported Unit 1C harvest has come from the Taku River area which is an indicator that it is an important travel corridor for fishers migrating from British Columbia into Southeast Alaska.

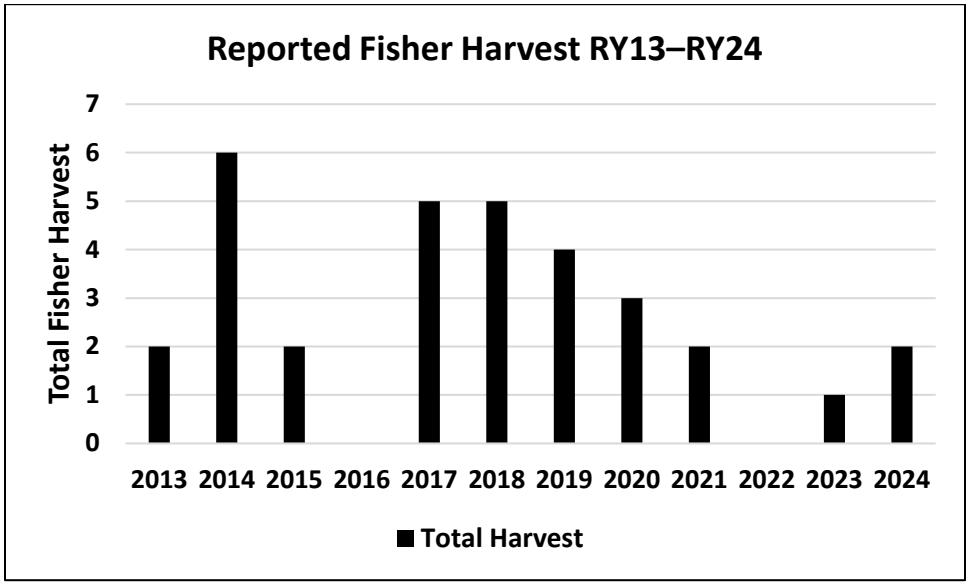

Figure 1. Total reported fisher harvest in Unit 1C since the fisher trapping season was opened in Southeast Alaska from RY13–RY24.

In 2018, a University of Idaho graduate student conducted a department-sponsored fisher occupancy study using camera traps in the Juneau area (Kupferman et al. 2019). Results indicated that an established population of fishers occurred in the study area.

No formal population estimates are available for fishers in Southeast Alaska. Harvest and trail camera data, and anecdotal observations are available and may provide information about population trends: the total annual reported harvest has been low ranging from 0–6 fishers per season (Figure 1); no fishers were reported harvested during RY16 or RY22. The decline in the reported harvest could be indictive of a decline in the fisher population or a change in trapping effort. However, data on trapping effort is lacking because of the small number of trappers in southeast who respond to the annual trapper questionnaire.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal as it is not likely to cause a biological concern for the population. Additional harvest is expected to be minimal; however, if there were a substantial increase in fisher trapping effort, it could impact this colonizing population.

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

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PROPOSAL 15 - 5 AAC 84.270(15). Furbearer trapping. Remove the bag limit for fishers in Units 1 –5.

PROPOSED BY: Nicholas Orr

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the bag limit for fishers in Units 1–5.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limit	Open Season
Units 1 – 5	Dec. 1 – Feb. 15

1 Fisher

There is a positive customary and traditional use finding for furbearers in Units 1 – 5 and an amount reasonably necessary for subsistence of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Residents and nonresidents could retain as many fishers as they take. Currently, trappers must surrender any fisher taken above the bag limit of one fisher per year.

BACKGROUND: The first fisher harvested in Southeast Alaska was taken on the Juneau road system in regulatory year (RY) 1996. From RY1996 to RY2011, 6 fishers were reported harvested in Unit 1C, near Juneau, incidental to marten and wolverine trapping. Those fishers were surrendered to the department because there was no trapping season at that time.

Proposals to open a fisher trapping season were submitted for the 2010 and 2012 Board of Game (board) cycles. At the time, the department had concerns about the potential for unsustainable fisher harvest if a season were opened. However, trappers were already harvesting fishers as incidental take in marten and wolverine sets. In 2012, the board adopted a proposal for a fisher season with a bag limit of 1 fisher. The department supported the proposal because it would allow the department to obtain information on distribution and sex from trapper-caught animals and limited harvest to 1 fisher. This would also allow the department to use donated carcasses to gather genetic material and track sex and age classes, and reproductive information from the carcasses of adult females.

The first trapping season opened during RY13 and a total of 33 fishers have been reported harvested from RY13–RY24 (Figure 1). Of those, 32 (17 females and 15 males) were reported harvested from Unit 1C; only 1 fisher harvest has been reported outside of Unit 1C and that was a male harvested in RY23 from Unit 1D. An additional female was killed by a car in RY22 on Glacier Highway in Juneau. About one-third of the reported Unit 1C harvest has come from the Taku River area which is an indicator that it is an important travel corridor for fishers migrating from British Columbia into Southeast Alaska.

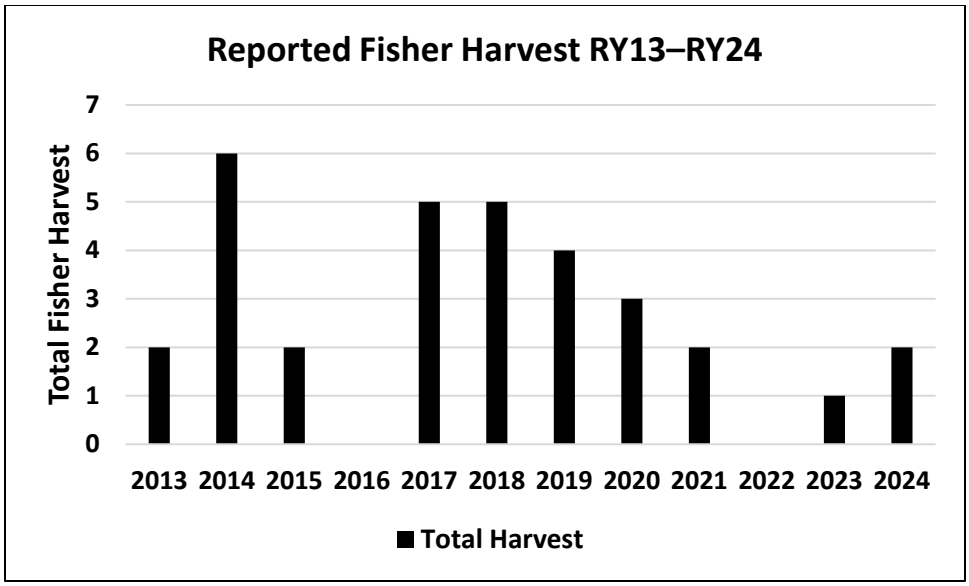

Figure 1. Total reported fisher harvest in Unit 1C since the fisher trapping season was opened in Southeast Alaska from RY13–RY24.

In 2018, a University of Idaho graduate student conducted a department-sponsored fisher occupancy study using camera traps in the Juneau area (Kupferman et al. 2019). Results indicated that an established population of fishers occurred in the study area.

No formal population estimates are available for fishers in Southeast Alaska. Harvest and trail camera data, and anecdotal observations are available and may provide information about population trends: the total annual reported harvest has been low ranging from 0–6 fishers per season (Figure 1); no fishers were reported harvested during RY16 or RY22. The decline in the reported harvest could be indictive of a decline in the fisher population or a change in trapping effort. However, data on trapping effort is lacking because of the small number of trappers in southeast who respond to the annual trapper questionnaire.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal as it is not likely to cause a biological concern for the population. Additional harvest is expected to be minimal, however, if there were a substantial increase in fisher trapping effort, it could impact this colonizing population.

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

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PROPOSAL 16 – 5 AAC 85.065(a)(4). Hunting seasons and bag limits for small game. Change the migratory game bird season dates in Units 1–5 to October 8 – January 22.

PROPOSED BY: Devin Dalin

WHAT WOULD THE PROPOSAL DO? The proposal would replace the current season in the Southeast Hunt Zone (Units 1–4) from a two-segment split-season structure to a consecutive-day season with dates from October 8 – January 22.

Note: The proposal requests a change in the migratory game bird season dates for Units 1–5. However, Unit 5 is in the Gulf Coast Hunt Zone, and Federal regulations prohibit the board from considering season date changes that cross hunt zones.

WHAT ARE THE CURRENT REGULATIONS?

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

(A) Ducks (B) Sea Ducks (C) Geese, Canada and cackling combined (D) Geese, White-fronted (E) Geese, Light (Snow and Ross') (F) Brant (H) Cranes (I) Snipe

Units and Bag Limits	**Resident Open Season** (Subsistence and General Hunts)	**Nonresident Open Season**
Units 1 – 4	Sept. 1 — Nov. 30	Sept. 1 — Nov. 30
	Dec. 16 — Dec. 31	Dec. 16 — Dec. 31

There is a positive customary and traditional use finding for migratory game birds in all units with a harvestable portion, outside of non-subsistence areas. The Board of Game (board) has not determined an amount necessary for subsistence.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The current in-season closure would be eliminated and replaced by a consecutive-day season structure. Hunting opportunity of early season migrants would be significantly reduced in favor of late-season species by shifting the season dates from September – December to October – January.

BACKGROUND: Migratory game bird regulations in Alaska are delineated by 5 hunt zones: Southeast (Units 1–4); Gulf Coast (Units 5–7, 9, 14–16); Kodiak (Unit 8); Northern (Units 11–13, 17–26); and Aleutians (Unit 10). The federal framework for migratory game bird hunting limits the season to a maximum of 107 days and specifies that uniform start and end dates must apply throughout a hunt zone. Additionally, federal regulations restrict the range of season structure options that can be implemented within a hunt zone in Alaska to two options: a consecutive-day season or a split-season (open-closed-open) in a single hunt zone. Alaska's single split-season option is currently assigned to the Southeast Zone, after the department

requested the federal framework be modified to reassign the split-season option from the Kodiak Zone to the Southeast Zone in 2021.

In past regulatory cycles, the board addressed several proposals for the Southeast Hunt Zone seeking to adjust the season opening date later than September 1 to provide late-season hunting opportunity; but lacking information about hunter preferences, the board opted to leave the season date unchanged. In general, hunters in Southeast are divided between a preference for an early season opening to target September migrants (e.g., wigeon, pintail, teal) or preference for a later season to target wintering waterfowl (e.g., resident mallards, Canadian geese, and sea ducks).

In 2008, the department conducted a survey of resident waterfowl hunters in the Southeast region to better understand their preferences for season dates. A short menu of opening date options was offered that hunters could select from that included September 1, September 16, and October 8. The results indicated a preference for an earlier season in the northern part of the region and a later season in the southern part of the region: the overall weighted preference was for a September 16 start date (41%), while 35% preferred September 1 and 24% preferred October 8. In November 2008, the board addressed a proposal to shift the season dates from early October–mid-January. The board adopted the season dates of September 16 – December 31 to balance the disparate desires of most Southeast region waterfowl hunters.

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

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

The odd-even-year season dates resulted in added regulatory complexities in the Southeast Hunt Zone and reduced early or late season opportunity depending on the year. In 2021, the board adopted the current split-season structure (open September 1–November 30 and December 16–December 31) to balance between early and late-season preferences across the Southeast region, and reduce regulatory complexity associated with biennial changes in season dates.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding this proposal because there are no biological concerns with shifting season dates. However, the department recommends preserving the current regulation that allows a split-season structure in the Southeast Hunt Zone (Units 1–4) to hunt migratory game birds. The current regulation reasonably balances disparate hunter preferences for early and/or late hunting opportunity that aligns with in-season species-specific abundances. Reverting to a consecutive-day season that favors either an early or late opening date has potential to reignite a contest of proposals for conflicting outcomes that fail to reconcile the polarity in hunter preferences across the Southeast region.

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

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PROPOSAL 17 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Change the bag limit for grouse in Units 1-5 by prohibiting the take of females between March 15 and May 15.

PROPOSED BY: Peter Robertson

WHAT WOULD THE PROPOSAL DO? This proposal would only allow the take of male grouse from March 15 to May 15 within Units 1–5 (because Unit 6 is not in the legal notice for this meeting). The season dates would remain August 1–May 15 for males but would change to August 1–March 14 for females.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.065

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Units and Bag Limits	**Resident & Nonresident Open Season (Subsistence & General Hunts)**
Units 1 – 6 5 per day, 10 in possession	Aug. 1 – May 15

The board has not determined if there are customary and traditional uses of grouse in Units 1–6.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would not alter the current season dates (August 1–May 15) but would modify the bag limit to only allow harvest of male grouse from March 15 to May 15 within Units 1–5.

BACKGROUND: The current hunting season dates (August 1–May 15) for Units 1–5 have been in place since the 1987–88 hunting season and the bag and possession limits for Units 1–5 have remained the same since the 1968–69 hunting season. Currently, grouse hunting seasons across the rest of Alaska begin on August 10, with Unit 14C (September 1) and Unit 20D (August 25) being the two exceptions, with most seasons ending on either March 31 or April 30. No other units restrict harvest to only male grouse or ptarmigan.

The department has limited grouse and ptarmigan harvest data from Southeast Alaska. The harvest data available is mostly from sooty grouse, and is voluntarily submitted by hunters. These data only provide information on timing of harvest as well as age- and sex-ratios of the harvest. Of the 524 sooty grouse wings donated to the department since the 2012–13 hunting season, 78% (n = 410) were from birds harvested during the months of April and May, and only 3% (n = 15) were from harvests occurring during the month of August. Of the 395 sooty grouse wings submitted from harvests during the months of April and May, where identification of sex was possible, 88% (n = 346) were males. Caution is warranted using these data to draw strong conclusions due to the small number of wings donated and the small number of hunters participating in the voluntary program each year. However, the wing data suggest that most of the sooty grouse harvest is of males and occurs during the spring breeding period when male sooty grouse are more conspicuous to hunters. Also, the data suggest that harvest of females may be highest during the spring as well, as 54% of donated wings from females were taken during the months of April and May.

While there is limited data available on grouse nesting ecology in Southeast Alaska, a study conducted from 2007–2008 (Nelson 2010) documented nesting activity from May 14 to July 1 for spruce grouse on Prince of Wales Island (POW). Similarly, hatch data from a study of sooty grouse in British Columbia indicated nest initiation for sooty grouse may begin as early as May 7 (range: May 7–May 17; Bendell 1954). Current hunting regulations allow harvest of females until May 15, which may overlap the beginning of the nesting period.

There are differences in physical characteristics and behavior (e.g., hooting), during the mating season, that would allow hunters to select for males only, and limiting harvest to males only after March 14th will likely result in fewer females being harvested each year; however, it is unclear if this regulatory change will have an impact at the population level (i.e., result in higher annual abundance).

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal, because it unnecessarily reduces hunting opportunity and there is currently no conservation concern for grouse in Units 1–5. If adopted, this change would be applicable to both sooty and spruce grouse. The proposal was submitted to address Units 1-6, however Unit 6 is located within the Southcentral Region, and the board does not have the ability to make changes to Unit 6 at the January 2026 board meeting.

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

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PROPOSAL 18 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Shift the grouse hunting season in Units 1-5 to open later and close later.

PROPOSED BY: Wrangell Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would change the season dates for grouse in Units 1 – 5 from August 1–May 15 to August 10– May 31.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.065

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Units and Bag Limits	**Resident & Nonresident Open Season (Subsistence & General Hunts)**
Units 1 – 6 5 per day, 10 in possession	Aug. 1 – May 15

The board has not determined if there are customary and traditional uses of grouse in Units 1 – 5.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would delay the season start date in Units 1 – 5 by 9 days but allow hunting 16 days past the current season end date, ultimately lengthening the grouse hunting season in Units 1–5 by 7 days. A 9-day delay to the start of the hunting season will allow grouse chicks to increase in size, especially chicks that hatched late in the season. Shifting the season dates so that the hunting season extends into late May will result in the hunting season overlapping the nesting period for sooty and spruce grouse.

BACKGROUND: The current hunting season dates (August 1–May 15) for Units 1–5 have been in place since the 1964-65 hunting season and the bag and possession limits have remained the same since the 1965-66 hunting season. Currently, grouse hunting seasons across the rest of Alaska begin on August 10, with Unit 14C (September 1) and Unit 20D (August 25) being the two exceptions, with most seasons ending on either March 31 or April 30.

Shifting the start date of the season to August 10 from August 1 will allow grouse chicks to increase in size, especially chicks hatched late in the season. However, it is unlikely that late-hatched chicks will be comparable in size to adults after a 9-day delay to the start of the season.

The department has limited grouse and ptarmigan harvest data from Southeast Alaska. The harvest data available is mostly from sooty grouse, is voluntarily submitted by hunters, and only provides information on timing of harvest as well as age- and sex-ratios of the harvest through wing collection. Of the 527 sooty grouse wings donated to the department since the 2012-13 hunting season, 78% (n = 410) were from birds harvested during the months of April and May, and only 3% (n = 15) were from harvests occurring during the month of August. Of the 395 sooty grouse wings submitted from harvests during the months of April and May where identification of sex was possible, 88% (n = 346) were males. Although caution is warranted using this data to draw strong conclusions due to the small number of wings donated and the small number of hunters participating each year, the wing data suggests that most of the sooty grouse harvest is of males and occurs during the spring breeding period when male sooty grouse are more conspicuous to hunters. However, the data suggests that harvest of females may be highest during the spring as well, as 54% (n = 49) of donated wings from females were taken during the months of April and May.

While there is limited data available on grouse nesting ecology in Southeast Alaska, a study conducted from 2007-2008 (Nelson 2010) documented nesting activity from May 14 to July 1 for spruce grouse on Prince of Wales Island (POW). Similarly, hatch data from a study of sooty grouse in British Columbia, indicated nest initiation for sooty grouse may begin as early as May 7 (range: May 7-May 17; Bendell 1954). Therefore, extending the hunting season to May 31 will likely result in additional harvest of both male and female grouse, including nesting females

DEPARTMENT COMMENTS: The department is **NEUTRAL** on delaying the start to the hunting season from August 1 to August 10 but is **OPPOSED** to extending the season for grouse in Units 1–5 from May 15 to May 31. Extending the hunting season for grouse into late May will overlap the nesting period. Although harvest of females appears to be limited compared to males, most female harvest wing submissions take place during April and May. Additional harvest of females during the latter part of the nesting season may result in a conservation concern. If adopted this will include both sooty and spruce grouse.

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

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Proposals 19-22

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PROPOSAL 23 – 5 AAC: 85.030. Hunting Seasons and bag limits for deer. Increase the nonresident bag limit for deer in Unit 4 as follows:

Increase nonresident bag limit for Unit 4 Remainder (outside the area of Chichagof Island east of Port Frederick and north of Tenakee Inlet including all drainages in Tenakee Inlet) (Fig. 1) from two bucks to four deer.

PROPOSED BY: Alaska Department of Fish and Game

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

WHAT ARE THE CURRENT REGULATIONS?

Unit 4 Remainder

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

Nonresidents	Hunts	Dates
Two bucks	Bucks only	Aug. 1 – Dec. 31

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

The Alaska Board of Game has made a positive customary and traditional use finding for deer in Unit 4 and determined an amount reasonably necessary for subsistence of 5,200 – 6,000 deer annually.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would increase opportunity for nonresident deer hunters in Unit 4. This would likely result in a slight increase in the overall Unit 4 deer harvest.

BACKGROUND: The Unit 4 Remainder bag limit for residents and non-residents was 4 deer from prior to statehood until it was raised to 6 deer at the January 2019 BOG meeting. The 6 deer bag limit is the highest deer bag limit in the state (Unit 6, Prince William Sound has a five deer bag limit). The 6 deer bag limit was sustainable and provided excellent opportunity for both residents and nonresidents.

At the January 2023 BOG meeting, the board considered 2 public proposals to reduce the Unit 4 Remainder bag limit from 6 deer back to 4 deer. These proposals were submitted not because of any conservation concern, but as a good faith effort to help deter concurrent federal proposals being considered by the Federal Subsistence Board. The Federal proposals were aimed at closing

large areas of Unit 4 to non-federally qualified hunters. The BOG initially rejected the proposals to reduce the Unit 4 Remainder bag limit but later brought them back for reconsideration and passed an amended proposal to reduce the Unit 4 Remainder bag limit, for nonresidents only, from 6 deer to 2 bucks. This change was formulated to reflect the typical take by nonresidents. The Federal Subsistence Board subsequently passed regulations limiting non-federally qualified hunters in parts of Unit 4 despite these good faith efforts by the board and strong opposition from the department.

Deer populations in Unit 4 are currently robust and, anecdotally, at the highest densities anywhere in their range. After more than a decade of consecutive mild to moderate winters, populations are likely near, or exceeding, severe winter carrying capacities in many areas. Winter mortality transects and spring body condition surveys indicate that annual overwinter survival has been excellent for several consecutive years. Observed buck:doe and fawn:doe ratios during those surveys have averaged approximately 45:100 for both bucks and fawns.

Interest in hunting deer in Unit 4 by nonresidents is low. Much of Unit 4 is difficult to access. Few roads and limited marine and air taxi operators make nonguided hunts difficult without local connections (friends/family). Nonresident hunters typically choose Kodiak or Prince of Wales Islands. These locations have better access and produce deer with larger antlers than Unit 4.

During the 10 seasons preceding the January 2023 nonresident bag limit change (RY2013-RY2022), an average of 209 nonresident hunters harvested 150 deer annually in Unit 4 (87% bucks). This represents 6.2% of the hunters and 2.7% of the annual harvest in Unit 4. Despite the higher bag limits in effect during those years, on average only 4 nonresident hunters took more than two deer annually. Of those, 3 hunters harvested 3 deer and one harvested 4 deer annually. Therefore, the average reduction in nonresident deer harvest in Unit 4 resulting from the 2023 bag limit reduction has amounted to only 5 deer annually.

Unit 4 deer populations are high and stable to increasing. Nonresident hunting pressure is very low. Although the majority of nonresident hunters in Unit 4 take 2 or fewer deer, there is clearly an additional opportunity available for the small handful of nonresident hunters who would choose to take additional deer.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. Few nonresident hunters are likely to take advantage of a 4 deer bag limit; however, there is no biological or conservation concerns indicating there is a reason to not offer this additional opportunity. This proposal will have no impact on Unit 4 deer populations. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if this proposal is adopted.

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

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PROPOSAL 24 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Modify the boundary of the Unit 4, Chichagof Island Deer – General Hunt as follows:

Chichagof Island east of Port Frederick and north of Tenakee Inlet excluding drainages flowing south into the north shore of Tenakee Inet between East Point and Port Frederick.

PROPOSED BY: Michael Bethers

WHAT WOULD THE PROPOSAL DO? This proposal would modify the boundary of the Unit 4, Chichagof Island Deer – General Hunt (Fig. 1) to exclude drainages flowing south into the north shore of Tenakee inlet between East Point and Port Frederick (Fig. 2). This would move this excluded area into the Unit 4, remainder general deer hunt (Fig. 3). Under the Unit 4, remainder general hunt, the resident bag limit is 6 deer as opposed to 3 deer in the Chichagof Island general hunt. This proposal would raise the resident deer bag limit from 3 deer to 6 deer along the north shore of Tenakee Inlet.

WHAT ARE THE CURRENT REGULATIONS?

Unit 4: Chichagof Island east of Port Frederick and north of Tenakee Inlet:

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

Nonresidents	Hunts	Dates
Two bucks	Bucks only	Aug. 1 – Dec. 31

Unit 4: Remainder

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

Nonresidents	Hunts	Dates
Two bucks	Bucks only	Aug. 1 – Dec. 31

The Alaska Board of Game has made a positive customary and traditional use finding for deer in Unit 4 and determined an amount reasonably necessary for subsistence of 5,200 – 6,000 deer annually.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would provide more opportunity within the proposal area for non-federally qualified (NFQ) Alaska resident hunters and specifically hunters from Juneau. Providing this additional opportunity would allow those hunters to hunt either side of the inlet under the same bag limit. It

also would allow hunters additional flexibility when weather prohibits boat access to the south side of Tenakee Inlet.

Although it is difficult to predict potential increases in harvest, based on historical harvest data it is unlikely that this proposal would result in a significant increase in harvest. Federally qualified rural residents already have a 6 deer bag limit under federal subsistence hunting regulations, there are very few NFQ hunters that hunt this area, and nonresident hunters are not common here. Any increase in harvest is not likely to be a biological concern. Deer populations throughout Unit 4 are currently robust based on aerial survey data and anecdotal observations, and able to absorb additional hunting opportunity.

BACKGROUND: The current distinction in the Unit 4 deer hunting regulations between Chichagof Island east of Port Frederick and north of Tenakee Inlet began with the RY88 hunting season. NE Chichagof Island is the most heavily logged landscape in Unit 4. It also tends to get higher snowfall totals than elsewhere in Unit 4. An extensive road system associated with industrial clear-cut logging out of Hoonah as well as access to the Alaska Marine Highway system has created some of the most easily accessible deer hunting in Unit 4. The combination of access, compromised habitat and higher than average snowfall totals led the BOG to create this hunt area with a more conservative bag limit than the rest of Unit 4.

Under federal subsistence hunting regulations, rural residents of Southeast Alaska have a bag limit of 6 deer on federal lands throughout Unit 4, including federal lands on NE Chichagof Island. The state bag limit on NE Chichagof for non-federally qualified resident hunters is 3 deer. Approximately 400 (Range: 340 – 550) hunters each year pursue deer on Chichagof Island east of Port Frederick and north of Tenakee Inlet and harvest approximately 525 (range: 390 – 830) deer each year (regulatory year (RY)15 – RY24). The north shore of Tenakee Inlet accounts for approximately 13% of those hunters (53) and 12% of the harvest (63) annually.

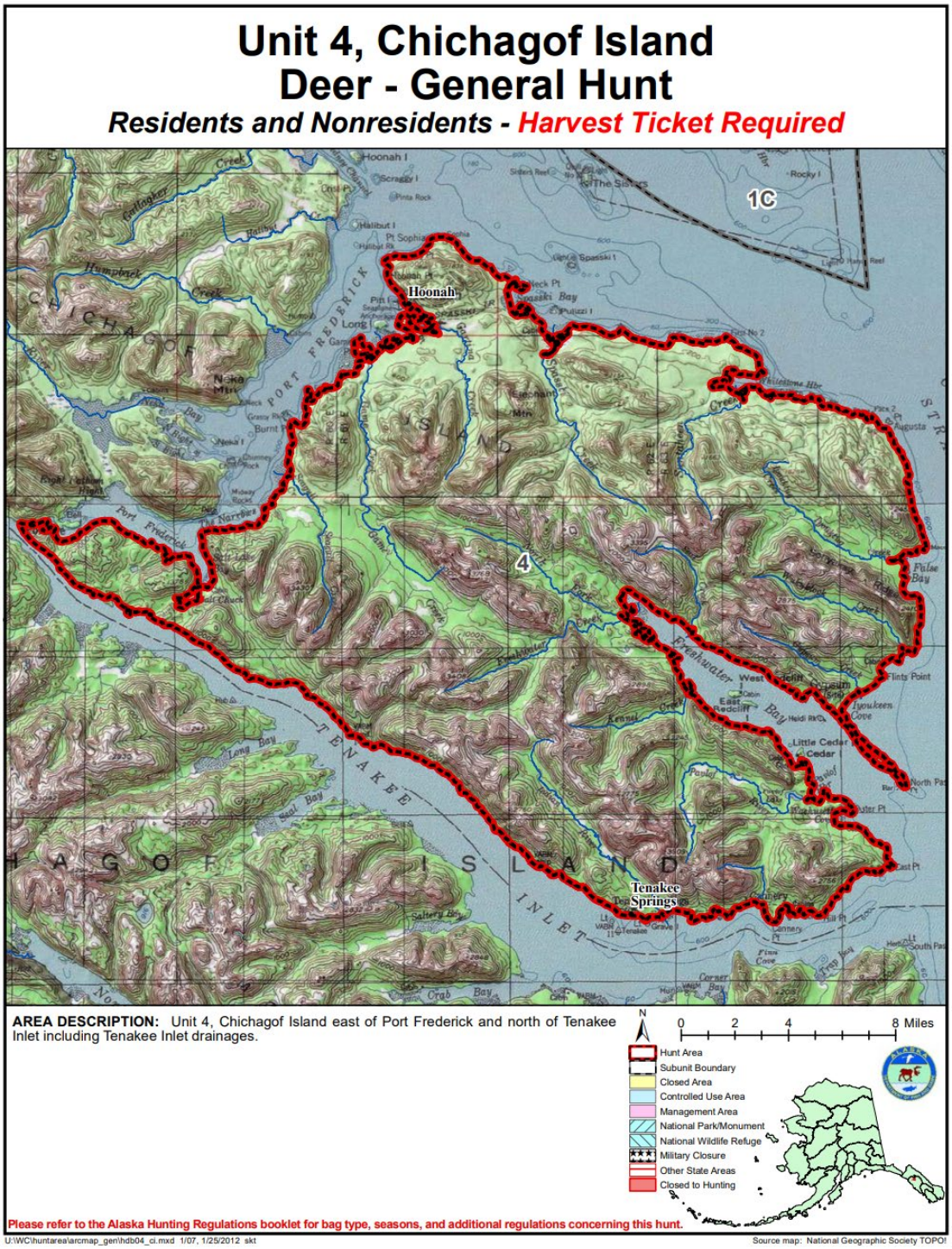

Figure 1. Current NE Chichagof Deer Hunt Area in Game Management Unit 4.

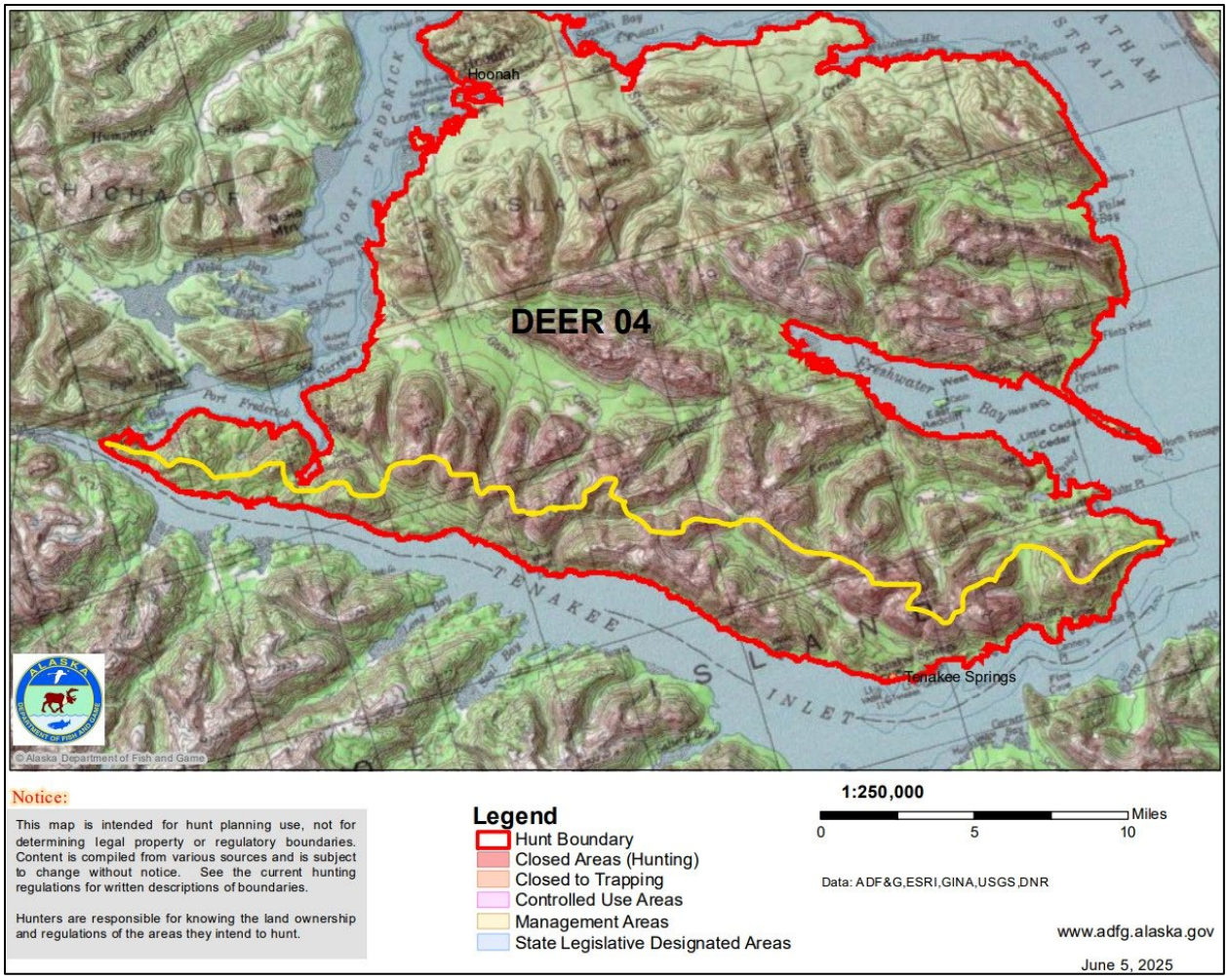

Figure 2. Unit 4 NE Chichagof Deer Hunt Area with Proposed Boundary Change (Yellow Line).

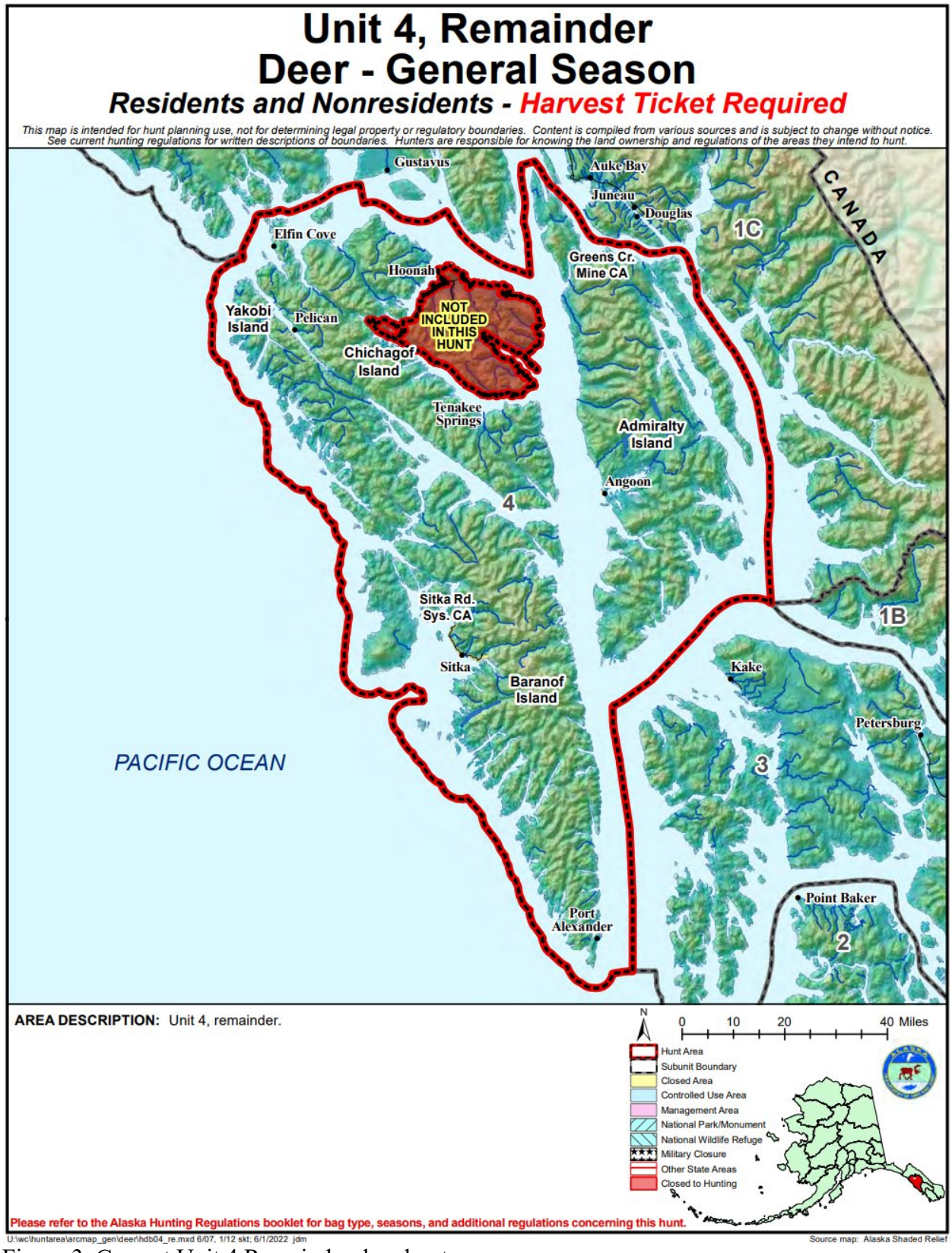

Figure 3. Current Unit 4 Remainder deer hunt area.

Non-federally qualified Alaska residents represent about 60% of the hunters and take 54% of the harvest in the proposal area on the north shore of Tenakee Inlet (RY15-RY24). This represents approximately 32 hunters and 34 deer annually. Nearly all these hunters are Juneau residents. Nonresident hunters make up a negligible portion (1–3 hunters take 1–2 deer annually). This proposal does not address the nonresident bag limit.

The Alaska Board of Game (board) created the conservative bag limit on NE Chichagof Island to address conservation concerns related to the extensive Hoonah road system. The north shore of Tenakee Inlet does not have any roads connected to that road system. The conservation concerns related to the Hoonah road system do not apply to the proposal area. NFQ hunters that use this proposed area harvest less than 2 deer/hunter on average. This indicates that few NFQ hunters currently fill their full bag limit of 3 deer from this area. Most NFQ resident hunters use boats to access Tenakee Inlet.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal. The NE Chichagof deer hunt area was created because of conservation concerns related to access via the extensive Hoonah road system and the associated industrial clear-cut logging. The north side of Tenakee Inlet addressed by this proposal is not connected to that road system. The proposal area can support additional hunting opportunity without a biological concern. The proposal requests a change to the boundary of the Northeast Chichagof Controlled Use Area found in 5 AAC 92.540; however, the proponent has since clarified the intent is only to change the bag limit for deer in the area in question and not the controlled use area. The board will need to amend the proposal to be clear there will be no changes to the controlled use area.

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

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PROPOSAL 25 – 5 AAC 92.510(a)(6)(A) Areas closed to hunting. Clarify the northern and southern boundaries of the Sitka Road System Closed Area as follows:

5 AAC 92.510. Areas closed to hunting. (a) The following areas are closed to hunting as specified:

(6) Unit 4:

(A) in the Sitka area, a strip one-fourth mile wide on each side of all state highways **between the east side of the Sawmill Creek bridge and the Katlian Bay Road gate** is closed to the taking of big game.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? Clarify the extent of the Sitka Road System Closed Area by adding defined landmarks at both the northern and southern ends of the closed area.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.510. Areas closed to hunting. (a) The following areas are closed to hunting as specified:

(6) Unit 4:

(A) in the Sitka area, a strip one-fourth mile wide on each side of all state maintained highways is closed to the taking of big game.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? There would be no actual change to the boundaries of the Sitka Road System Closed Area. The proposed change simply clarifies the boundary for the public and law enforcement.

BACKGROUND: The Sitka Road System Closed Area was created in 1968. At that time the definition was simply "All of Halibut Point Road and Sawmill Creek Boulevard (SMC Blvd.) from the Sitka city limits to the pulp mill." In 1972 that definition was clarified to mean "within ¼ mile" of Halibut Point Road (HPR) and SMC Blvd. In 1979 the definition was changed to its current configuration, replacing HPR and SMC Blvd. with "all state highways."

The current definition of the closed area has been in place for approximately 45 years. The paved portion of SMC Blvd. ends at the Sawmill Creek bridge (Fig 1). Beyond the SMC bridge, the now gravel road continues for 8.5 miles and is referred to as the Green Lake Road. There is an always open gate at Herring Cove approximately 1.5 miles beyond the SMC Blvd pavement end and a locked gate approximately .25 mile beyond Herring Cove. Vehicular access is restricted beyond this locked gate (Fig. 1).

There has been some ambiguity regarding the south end of the closed area and differing interpretations by various ADF&G staff and law enforcement personnel. It is not clear if the closed area ends at the pavement end, at the Herring Cove gate (official end of State Highway maintenance), or at the locked Green Lake gate.

More recently the state began construction of the Katlian Bay Road which is a gravel road extending north from the end of HPR. There is a gate marking the end of HPR and the beginning of the Katlian Bay Road. Currently the Katlian Bay Road is open seasonally to vehicular traffic for approximately 2 miles beyond HPR. If completed, the new road will add an additional 9 miles of road system to the north (Fig. 2).

It is not the intent of the department to extend the closed area north to include the new Katlian Bay Road. Defining the northern boundary at the Katlian Road Gate encompasses all residential homes and U.S. Forest Service campgrounds as intended by the original extent of the closed

area. On the south end, although the state-maintained highway extends to Herring Cove, department maps and popular mapping apps depict the closed area boundary as the Sawmill Creek bridge (Fig. 3). Defining the southern end at the SMC bridge encompasses all residential homes and includes industrial development at the Gary Paxton Industrial Park.

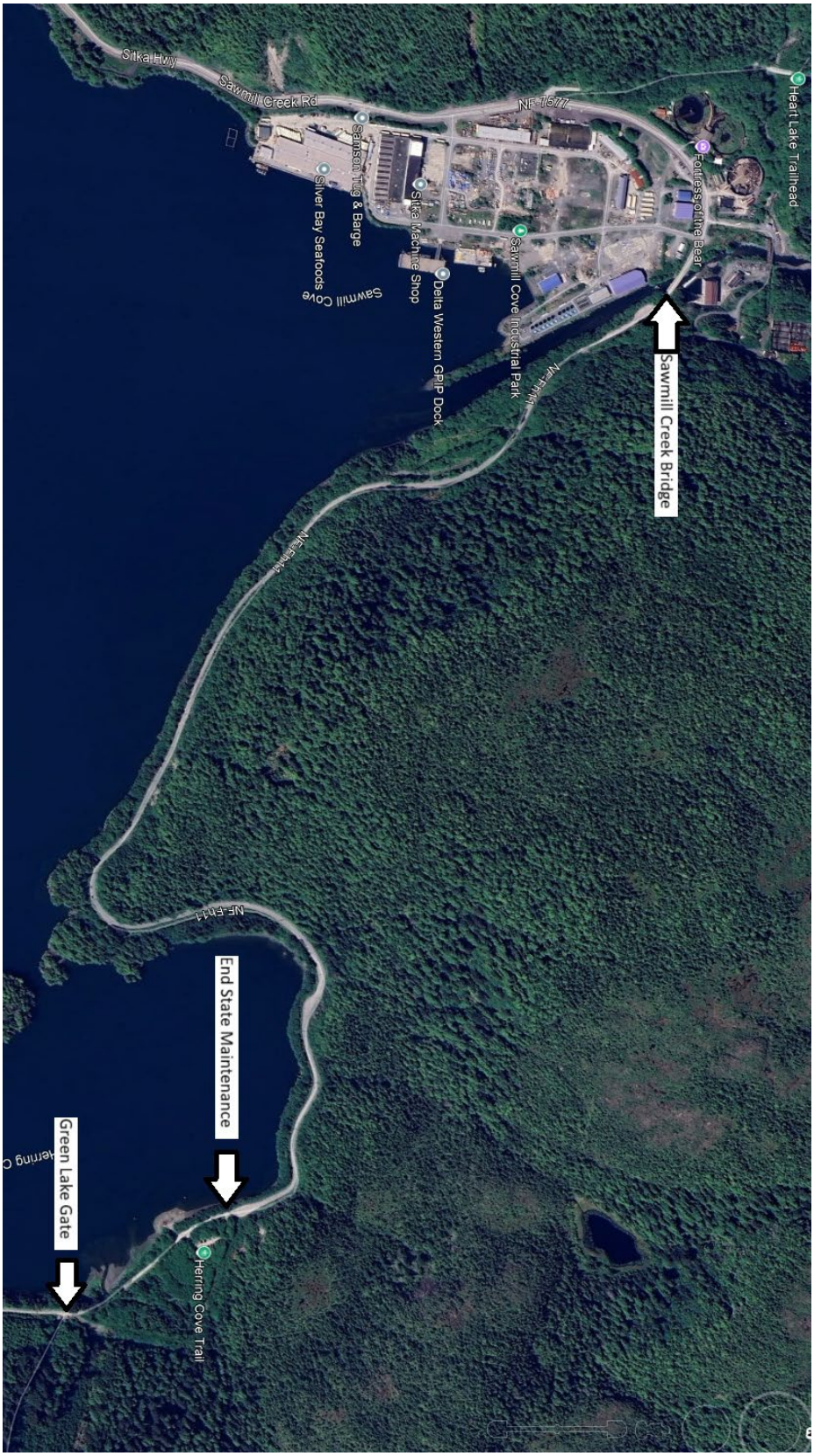

Figure 1. South end of Sitka Road System Closed Area.

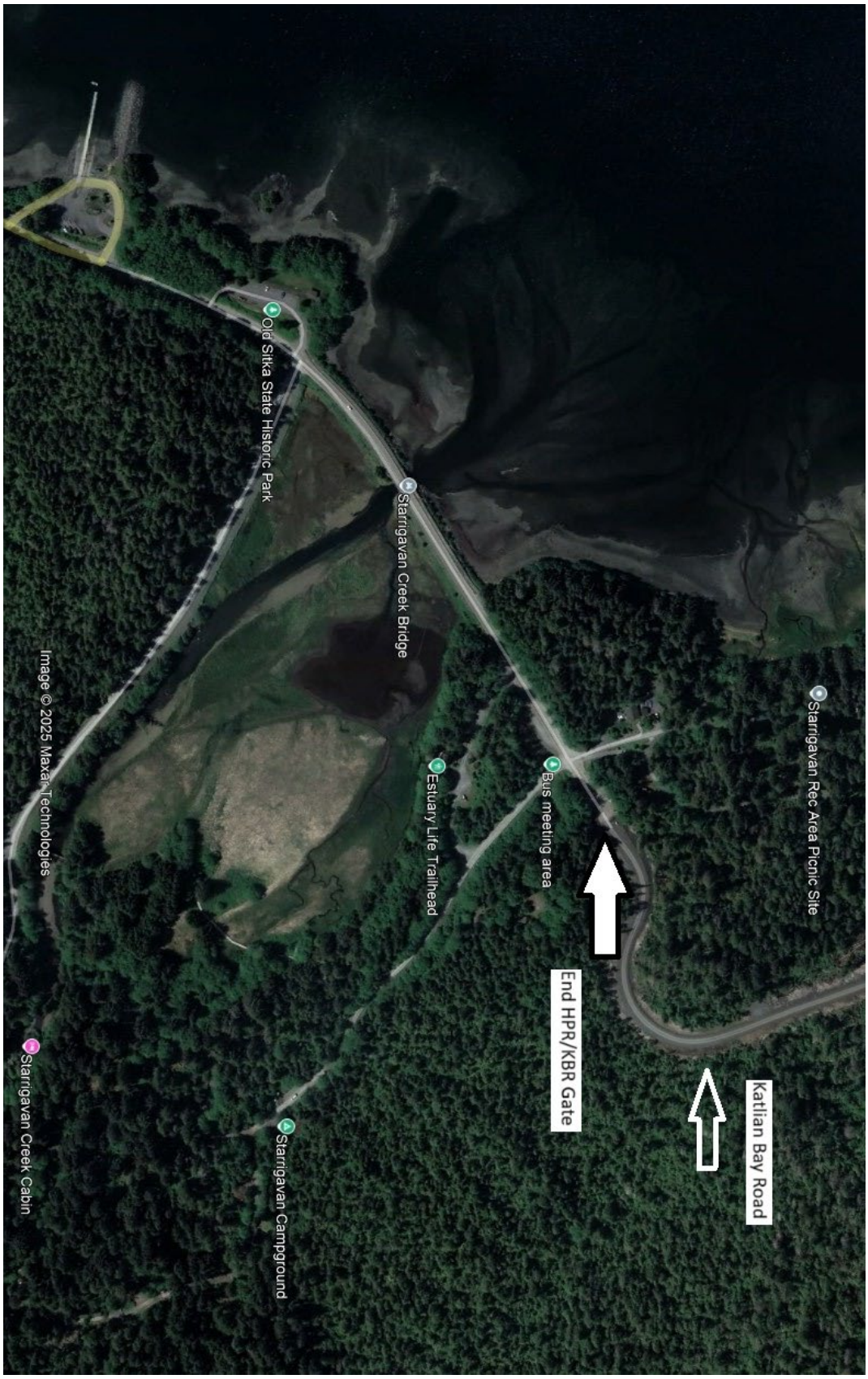

Figure 2. North end of Sitka Road System Closed Area.

Fig. 3. ADF&G map of Sitka Road System Closed Area.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal to clarify the boundary of the closed area. The proposed definition does not change the closed area; it clarifies the northern and southern boundaries to reflect new road construction to the north and clearly identifies the boundary to the south. The proposed boundary matches the intent of safety concerns associated with the Sitka Road System Closed Area.

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

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Proposal 26

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PROPOSAL 27 – 5 AAC 85.030. Hunting seasons and bag limit for deer. Change the bag limit for deer on Douglas Island in Unit 1C from 4 deer total (up to 1 doe) to 4 bucks only.

PROPOSED BY: David Summers

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the harvest of does on Douglas Island and change deer bag limit to bucks only.

WHAT ARE THE CURRENT REGULATIONS?

Units and bag limits	Open Season (Subsistence and General Hunts)	Nonresident Open Season
(1) …		
Unit 1 (C), Douglas Island 4 deer total, only one of which may be a doe, and only bucks may be taken before Sept. 15	Aug. 1—Dec. 31	Aug. 1—Dec. 31

Deer in Unit 1C have been identified as important for providing high levels of harvest for human consumption. The population objective for all of Unit 1C is 6,200 deer and the harvest objective is 450.

Douglas Island is within the Juneau Nonsubsistence area (NSA) and the subsistence priority does not apply.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would eliminate the opportunity to harvest does on Douglas Island. Initially, the effects of this

proposal may result in a slight decrease in hunter success. Long-term impacts could include a larger population of breeding does, resulting in a greater number of bucks and increased rates of hunter success.

BACKGROUND

Douglas Island offers the greatest road-accessible opportunity to hunt deer in the Juneau area. Harvests from the island usually account for over 70% of deer harvested in Unit 1C.

During regulatory years (RY) 2014–2024, deer harvest on Douglas Island ranged from 132 to 254 deer, with an average of 187 deer/year (Figure 1). Hunter success ranged from a low of 21% in 2014 to a high of 30% in 2015, with an average of 26.5%. Hunting effort required to harvest a deer ranged from 6.8 days in RY2015 to 10.9 days in 2014 (average 8.3 days: Figure 2).

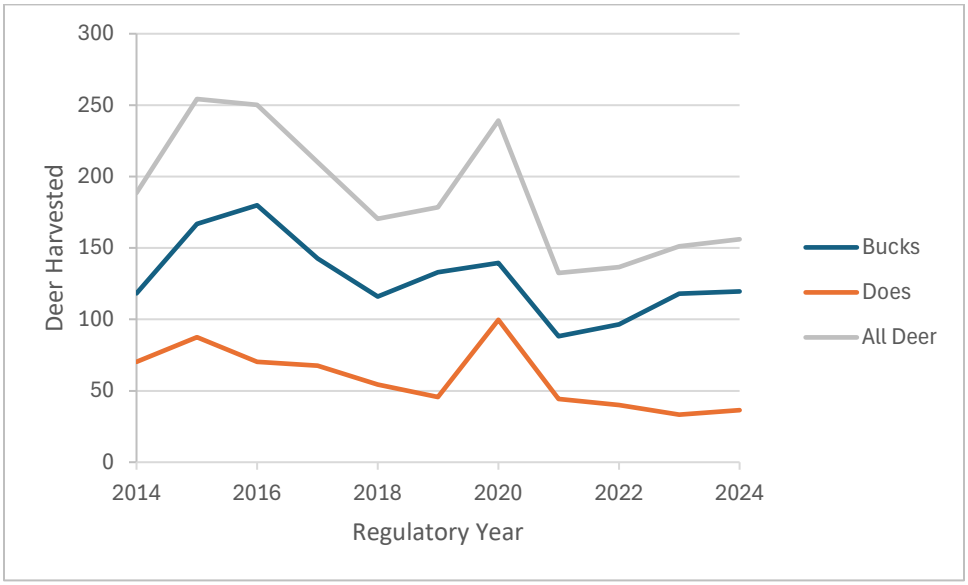

Figure 1. The annual harvest of all deer, bucks, and does on Douglas Island in Game Management Unit 1C from regulatory years 2014-2024.

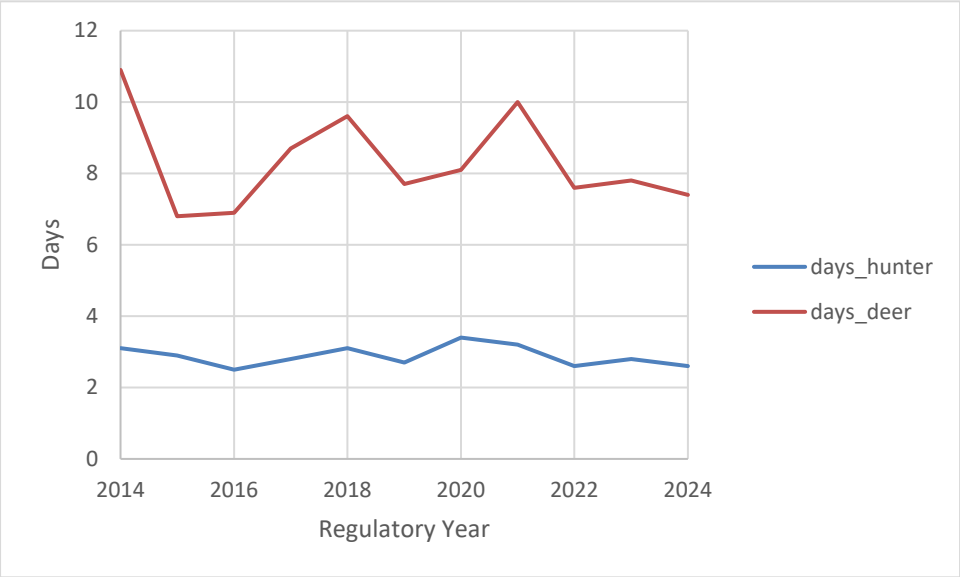

Figure 2. The annual average number of days hunted per hunter and the average annual number of days per harvested deer from 2014 to 2024 on Douglas Island.

In addition to harvest statistics, the department monitored the Douglas Island deer population using annual spring pellet group surveys from the 1990s through 2017. Pellet survey results can be influenced by snow fall patterns, pellet persistence, deer distribution, and timing of leaf-out; therefore, this method can only reliably indicate substantial (≥30%) changes in the population. Deer pellet group counts on Douglas Island were below the 10-year average from 2013-2017. In the years RY2008–2017, pellet group counts averaged 1.37 groups/plot on the north side of Douglas Island and 1.59 groups/plot on the west side of Douglas Island. Pellet group counts fell to a 10-year low in RY2016 when 0.77 groups/plot were observed on northern Douglas Island and 1.01 groups/plot were found on the west side of Douglas Island. Although the number of pellet groups/plot increased slightly from 2016 to 2017, pellet group counts during 2017 remained 37% lower on north Douglas Island and 52% lower on the west side of Douglas Island compared to counts in 2013. Beginning in 2018, the department installed trail cameras across Douglas Island to monitor the local deer population. ADF&G monitoring indicated a stable deer population from 2021–2024, with a higher estimated population than that of both 2016 and 2017.

From 2015–2022, hunters expressed concern over the return of wolves to Douglas Island and an increase in effort required to harvest deer. The number of wolves on Douglas Island is unknown, but the department estimates that there may be one wolf currently using the island based on anecdotal reports and recent lack of harvest. During RY2016, hunting and trapping seasons were closed on Douglas Island by emergency order following the harvest of 3 wolves in accordance with the Douglas Island Management Area (5 AAC 92.530(23)). One wolf was harvested during RY17, 3 wolves in RY18, 4 wolves in RY19, and 1 wolf was harvested in RY20. One wolf was killed due to a motor vehicle collision in RY23. There have been no wolves harvested since RY20, likely a reflection of limited abundance. The Board of Game (board) repealed the Douglas Island Management Area regulation at their 2023 Board of Game meeting. This repeal removed the

requirement for managers to close the season after 5 wolves were harvested, which allows more opportunity for wolf harvest on Douglas Island.

For Juneau hunters, the Douglas Island deer population is an important and accessible population. Just as wolves may have contributed to the perceived decline in population a decade ago, the board may wish to consider the consequences of habitat loss for the current population of Douglas Island deer. Development projects on North Douglas will impact the availability of suitable habitat to support a large deer population.

Between RG2014–2024, does accounted for between 22–42% of the total number of deer harvested on Douglas Island. To encourage a stable deer population, this proposal maintains the four deer bag limit, but only allows for the harvest of bucks. (Figure 3).

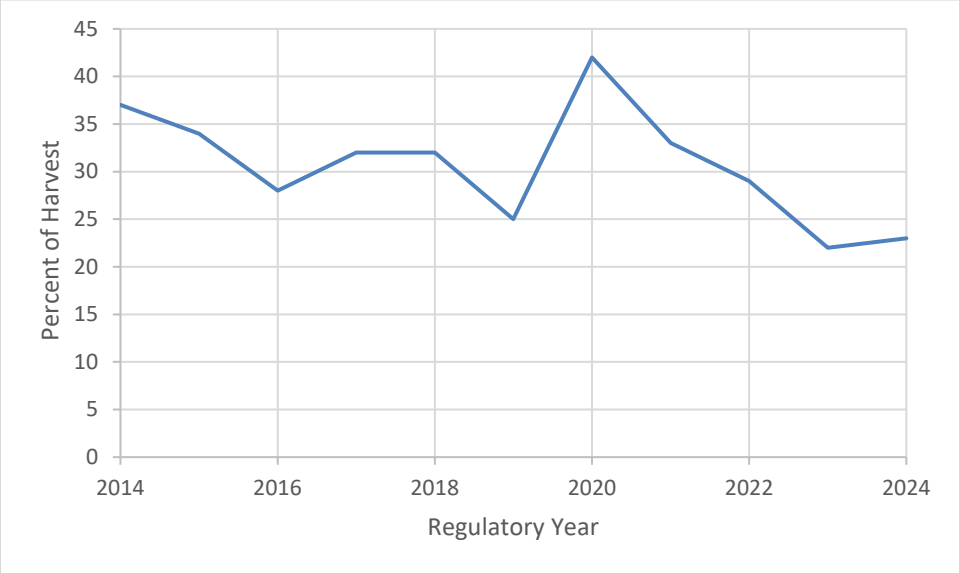

Figure 3. The percentage of doe take in the total Douglas Island deer harvest (2014-2024).

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. The department manages deer populations to ensure healthy populations and harvest opportunity. There is no conservation concern for the Douglas Island deer population. Limiting harvest to bucks-only will eliminate some opportunity initially, with the potential to provide greater harvest in the future. Douglas Island provides a good hunting opportunity for new or young hunters, and this unnecessary reduction in opportunity may negatively impact those hunters.

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

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PROPOSAL 28 – 5 AAC 85.030. Hunting seasons and bag limit for deer. Change the bag limit for deer on Douglas Island in Unit 1C from 4 deer total (up to 1 doe) to 2 bucks only.

PROPOSED BY: David Summers

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the harvest of does on Douglas Island and change the deer bag limit to 2 bucks only.

WHAT ARE THE CURRENT REGULATIONS?

Units and bag limits	Open Season (Subsistence and General Hunts)	Nonresident Open Season
(1) Unit 1 (C), Douglas Island 4 deer total, only one of which may be a doe, and only bucks may be taken before Sept. 15	Aug. 1—Dec. 31	Aug. 1—Dec. 31

Deer in Unit 1C have been identified as important for providing high-levels of harvest for human consumption. The population objective for all of Unit 1C is 6,200 deer and the harvest objective is 450.

Douglas Island is within the Juneau Nonsubsistence area (NSA) and subsistence priority does not apply.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would eliminate the opportunity to harvest does on Douglas Island, and decrease the bag limit from 4 deer to 2 bucks. In the short-term this will result in a decrease in opportunity, while in the long-term there could be an increase in breeding does that will result in a greater number of bucks and increased rates of hunter success.

BACKGROUND

Douglas Island offers the greatest road-accessible opportunity to hunt deer in the Juneau area. Harvests from the island usually account for over 70% of deer harvested in Unit 1C.

During regulatory years (RY) 2014–2024, deer harvest on Douglas Island ranged from 132 to 254 deer, with an average of 187 deer/year (Figure 1). Hunter success ranged from a low of 21% in 2014 to a high of 30% in 2015, with an average of 26.5%. Hunting effort required to harvest a deer ranged from 6.8 days in RY2015 to 10.9 days in 2014 (average 8.3 days: Figure 2).

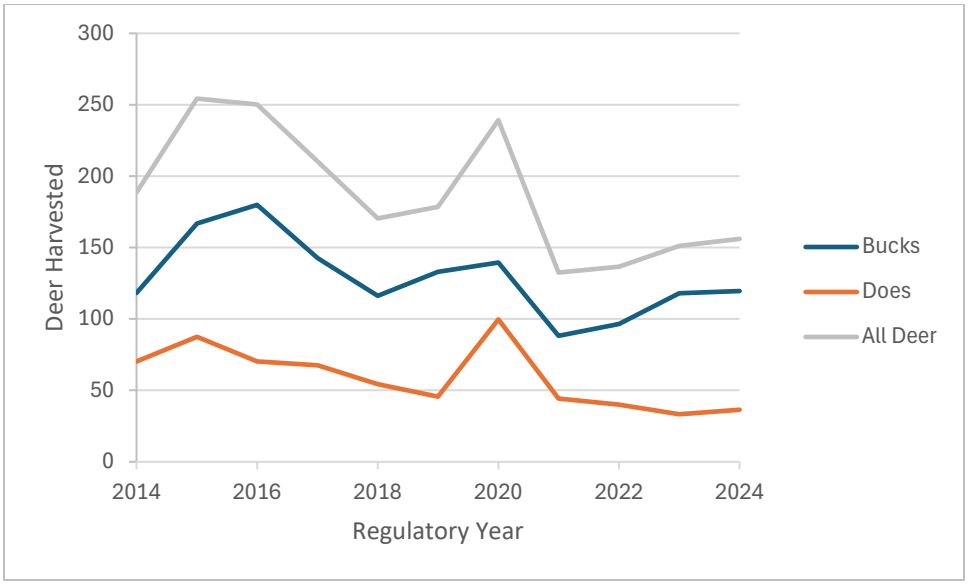

Figure 1. The annual harvest of all deer, bucks, and does on Douglas Island from regulatory years 2014-2024.

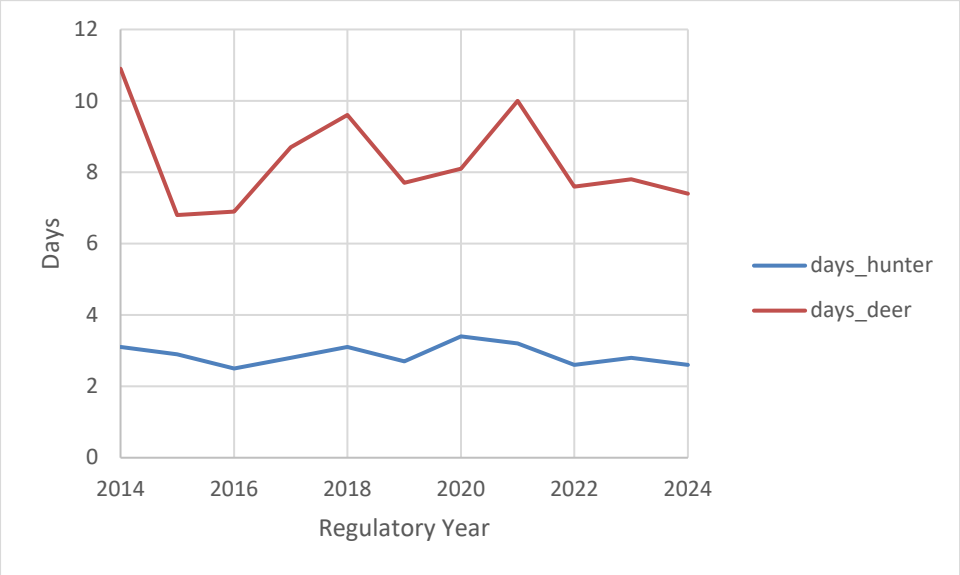

Figure 2. The annual average number of days hunted per hunter and the average annual number of days per harvested deer from 2014 to 2024 on Douglas Island.

In addition to harvest statistics, the department monitored the Douglas Island deer population using annual spring pellet group surveys from the 1990's through 2017. Pellet survey results can be influenced by snow fall patterns, pellet persistence, deer distribution, and timing of leaf-out; therefore, this method can only reliably indicate substantial (≥30%) changes in the population. Deer pellet group counts on Douglas Island were below the 10-year average from 2013-2017. In the years RY2008–2017, pellet group counts averaged 1.37 groups/plot on the north side of Douglas Island and 1.59 groups/plot on the west side of Douglas Island. Pellet group counts fell to a 10-year low in RY2016 when 0.77 groups/plot were observed on northern Douglas Island and

1.01 groups/plot were found on the west side of Douglas Island. Although the number of pellet groups/plot increased slightly from 2016 to 2017, pellet group counts during 2017 remained 37% lower on north Douglas Island and 52% lower on the west side of Douglas Island compared to counts in 2013. Beginning in 2018, the department installed trail cameras across Douglas Island to monitor the local deer population. ADF&G monitoring indicated a stable deer population from 2021–2024, with a higher estimated population than that of both 2016 and 2017.

From 2015–2022, hunters expressed concern over the return of wolves to Douglas Island and an increase in effort required to harvest deer. The number of wolves on Douglas Island is unknown, but the department estimates that there may be one wolf currently using the island based on anecdotal reports and recent lack of harvest. During RY2016, hunting and trapping seasons were closed on Douglas Island by emergency order following the harvest of 3 wolves in accordance with the Douglas Island Management Area (5 AAC 92.530(23)). One wolf was harvested during RY17, 3 wolves in RY18, 4 wolves in RY19, and 1 wolf was harvested in RY20. One wolf was killed due to a motor vehicle collision in RY23. There have been no wolves harvested since RY20, likely a reflection of limited abundance. The Board of Game (board) repealed the Douglas Island Management Area regulation at their 2023 Board of Game meeting. This repeal removed the requirement for managers to close the season after 5 wolves were harvested, which allows more opportunity for wolf harvest on Douglas Island.

For Juneau hunters, the Douglas Island deer population is an important and accessible population. Just as wolves may have contributed to the perceived decline in population a decade ago, the board may wish to consider the consequences of habitat loss for the current population of Douglas Island deer. Development projects on North Douglas will impact the availability of suitable habitat to support a large deer population. Current regulations allow harvest of 4 deer, including 1 doe. This proposal aims to reduce the bag limit to 2 bucks only. Between RY 2014–2024, 22–42% of the deer harvested from Douglas Island have been does (Figure 3).

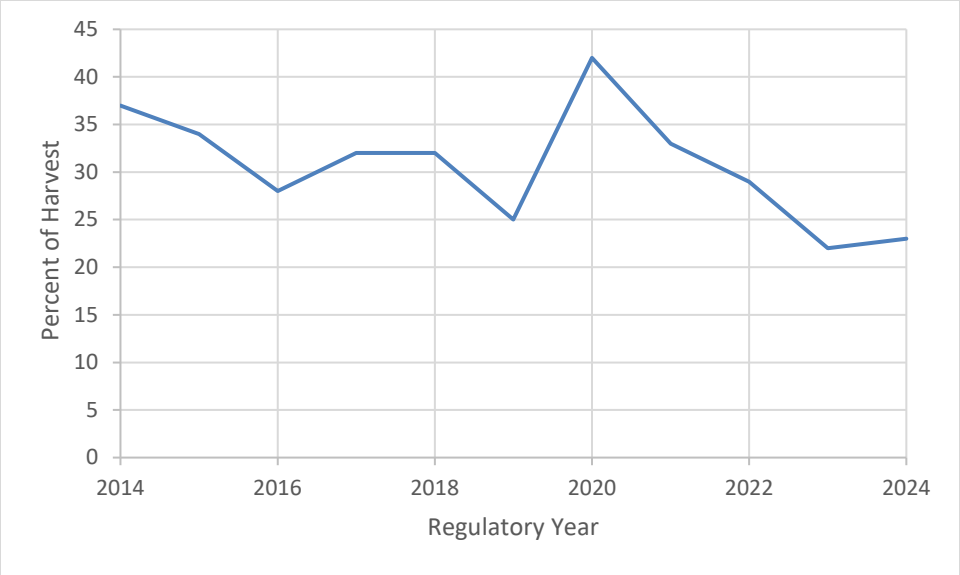

Figure 3. The percentage of doe take in the total Douglas Island deer harvest 2014-2024.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. The department manages deer populations in order to have sustainable populations while also allowing for the greatest hunting opportunity. There is no conservation concern for the Douglas Island deer population. Limiting the harvest to 2 bucks-only will unnecessarily take away opportunity for Douglas Island deer hunters, while also taking away the one place where a dedicated deer hunter without a boat can hunt. Douglas Island provides a good hunting opportunity for new or young hunters, and this unnecessary reduction in opportunity may negatively impact those hunters.

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

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PROPOSAL 29 – 5 AAC 85.030(a)(1). Seasons and bag limits for deer. Require antler restriction for bucks on Douglas Island.

PROPOSED BY: David Summers

WHAT WOULD THE PROPOSAL DO? This proposal would implement an antler restriction on Douglas Island that bucks would have at least one forked antler on one side.

WHAT ARE THE CURRENT REGULATIONS?

Resident

Units and Bag Limit	Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 1C, Douglas Island 4 deer total, only one of Which may be a doe, and Only bucks may be taken Before Sept. 15	Aug. 1 – Dec. 31	Aug. 1 – Dec. 31

Deer in Unit 1C have been identified as important for providing high levels of harvest for human consumption. The population objective for all of Unit 1C is 6,200 deer and the harvest objective is 450.

Douglas Island is within the Juneau Nonsubsistence Area, therefore there are no customary and traditional use findings for deer in this area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

This proposal would implement an antler restriction to regulate deer harvest on Douglas Island. The current bag limit is 4 deer, 1 of which can be a doe. Restricting harvest to bucks with a forked antler on at least 1 side would allow younger bucks to achieve a higher survival rate and reduce the overall harvest on the island. While doe conservation on the island would increase the deer population over time, buck conservation would not result in the desired changes in the population. Successful breeding is not an issue on Douglas Island. Data collected from game cameras suggest that most does have fawns by the spring.

BACKGROUND: While antler/horn restrictions are common for some species throughout the state, there has never been an antler restriction for deer in Alaska. Antler restrictions for moose are controversial across Southeast Alaska, and a regulation for deer would also be expected to raise controversy, especially in the beginning as hunters learn how to judge points and a forked antler on deer. The implementation of this proposal would require the board to develop legal definitions for deer antlers.

The proponent suggests that there is a conservation concern for the Douglas Island deer population, which is not the case. Deer numbers have fluctuated (Table 1) in relationship with the island's wolf population which have had little impact on deer harvest. Wolf numbers on the island are currently low based on anecdotal hunter reports, low harvest, and the absence of wolves on game cameras. Over the last 3 years, hunters on Douglas Island took an average of 7.6 days to harvest a deer, indicating stable levels of deer harvest and hunter success, a measure used as the catch/unit effort and an index of the deer population (Figure 1).

Table 1. Hunter harvest statistics for Douglas Island, Alaska for regulatory year 2011 – 2024.

Regulatory year	No. hunters	Successful hunters	Percent success	Days hunted	Buck harvest	Doe harvest	Total harvest	Percent bucks	Deer/hunter	Avg. days hunted	Days to harvest a deer
2024	442.7	129.3	29	1153.9	119.6	36.5	156.1	77	0.4	2.6	7.4
2023	424	120.3	28	1172	117.9	33.3	151.1	78	0.4	2.8	7.8
2022	404.5	110.2	27	1041.6	96.5	40	136.5	71	0.3	2.6	7.6
2021	413.6	110.7	27	1331.4	88.2	44.3	132.5	67	0.3	3.2	10
2020	573.2	176.2	31	1931.3	139.6	99.7	239.2	58	0.4	3.4	8.1
2019	507.6	130.5	26	1376.7	133.1	45.6	178.6	75	0.4	2.7	7.7
2018	526.2	119.8	23	1636.9	116.1	54.4	170.5	68	0.3	3.1	9.6
2017	644.1	151.3	23	1822.5	142.6	67.6	210.2	68	0.3	2.8	8.7
2016	698.7	186.3	27	1734.8	179.9	70.3	250.1	72	0.4	2.5	6.9
2015	598.4	176.8	30	1733.1	166.8	87.5	254.3	66	0.4	2.9	6.8
2014	668.7	141.9	21	2050.2	118.2	70.3	188.5	63	0.3	3.1	10.9
2013	749	188.8	25	2389.5	139.1	119.3	258.4	54	0.3	3.2	9.2
2012	732.8	184.5	25	2606.3	176.4	95.5	271.9	65	0.4	3.6	9.6
2011	657.5	239.8	36	2181.9	221.5	137.4	359	62	0.5	3.3	6.1

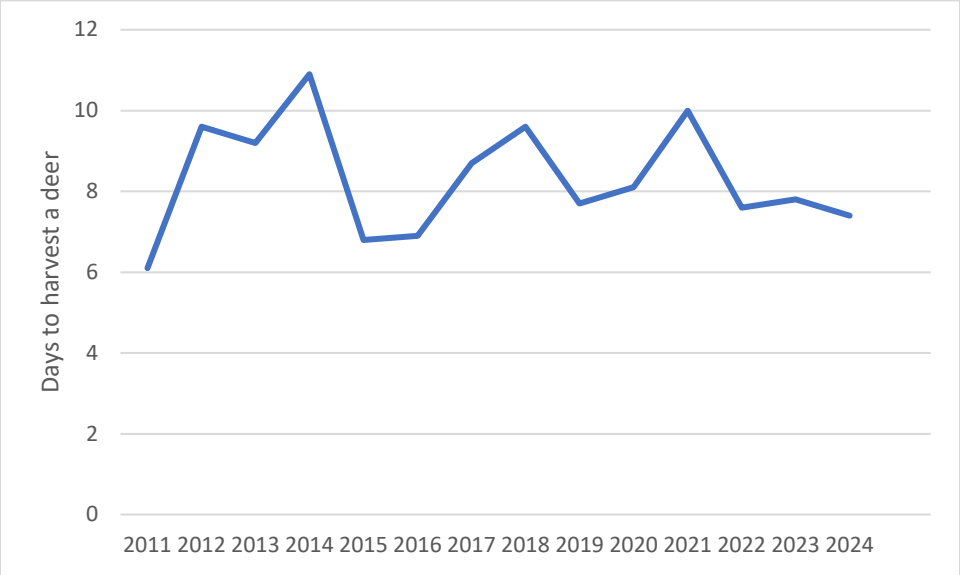

Figure 1. The number of days it takes to harvest a deer on Douglas Island, regulatory years 2011 – 2024.

This proposal suggests that reducing the harvest of young bucks will lead to an increase in the deer population on Douglas Island. The Western Association of Fish and Wildlife Agencies Mule Deer Working Group published a fact sheet disproving a positive correlation between antler restrictions and increased deer populations for mule deer. Many western states and provinces have discontinued their antler point restrictions because they did not achieve their intended goals. Even for populations with a skewed buck:doe ratio of < 10:100, an antler restriction was not effective for increasing fawn production as pregnancy rates were well over 90% even before the restrictions were implemented, according to the Mule Deer Working Group (July 2013).

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it is an unnecessary reduction in opportunity and is not expected to have the intended effect. There are no other antler restrictions for deer anywhere in the state. If the board adopts the proposal, it should also create a definition for forked deer antlers.

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

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PROPOSAL 30 – 5 AAC 85.045(a)(3). **Hunting seasons and bag limits for moose.** Create a moose hunt for disabled hunters in Unit 5A west of the Dangerous River.

PROPOSED BY: Brian Metz

WHAT WOULD THE PROPOSAL DO? This proposal would create a moose hunt for up to 5 disabled hunters in Unit 5A west of the Dangerous River on various non-federal lands with the same start date as the federal season in Yakutat (October 8); proxy hunting would be allowed in this hunt.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limit	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 5A west of the Dangerous River and excluding the portion south of Wrangell-Saint Elias National Park, north and east of Russel and Nunatak Fjords, and east of the east side of the East Nunatak Glacier to the Canadian Border (Nunatak Bench) 1 bull by registration permit only; up to 60 bulls may be taken in combination with the remainder of unit 5A; the commissioner may, by emergency order, close the season in that portion west of the Dangerous River when 30 bulls have been taken from that area	Oct. 15 – Nov. 15	Oct. 15 – Nov. 15

AS 16.05.940 (26) "person with physical disabilities" means a person who presents to the department either written proof that the person receives at least 70 percent disability compensation from a government agency for a physical disability or an affidavit signed by a physician licensed to practice medicine in the state stating that the person is at least 70 percent physically disabled;

Unit 5A has a negative intensive management finding for moose.

Unit 5A has a positive customary and traditional use (C&T) finding for moose, with an amount necessary for subsistence (ANS) of 50 animals.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow Alaska residents with a disability to hunt moose on non-federal lands around Yakutat (Figure 1; within the area west of the Dangerous River; excluding the Nunatak Bench). Both the proxy and beneficiary must be eligible to participate in the hunt, so allowing proxy hunting will likely result in little additional harvest.

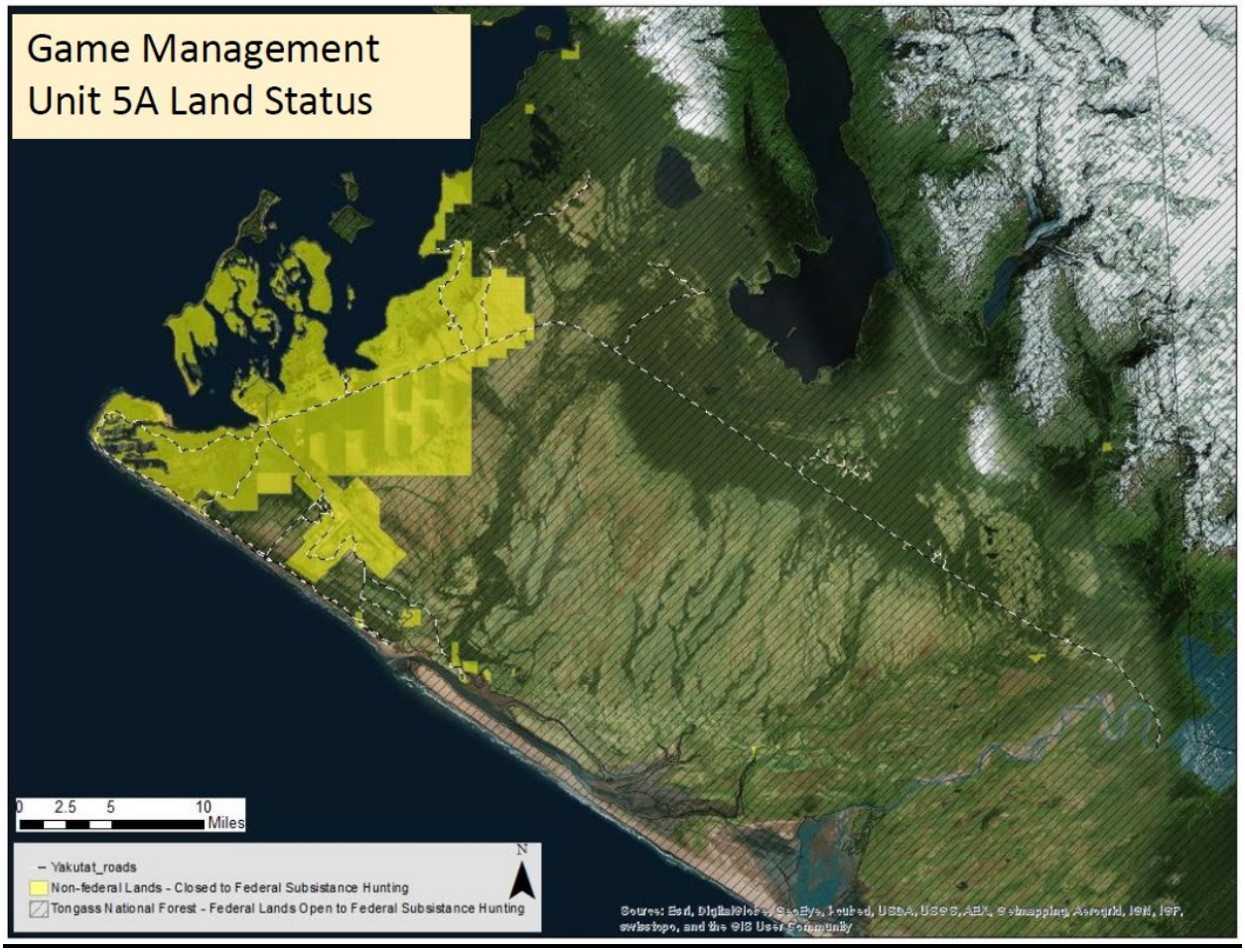

Figure 1. Non-federal land (in yellow) around Yakutat, Game Management Unit 5A, Alaska. The map includes most of GMU 5A west of the Dangerous River.

BACKGROUND: All hunts in Alaska for disabled persons apply only to military veterans. Alaska statute requires a 70% disability (certified by a physician) in order to be eligible as a proxy hunter (if under 65 y.o.) or to obtain a permit to hunt from a boat in Southeast Alaska. Both the permitted hunter and proxy hunter must meet these requirements to proxy hunt.

There is currently a federal season open only to residents of Yakutat on federal lands that starts at the same time as proposed for this hunt, October 8th . Figure 1 depicts the extensive federal lands that are currently available to all Yakutat residents, including disabled residents of Yakutat to hunt. Traditionally the federal season starts the week before the state season and typically trumps the state season because the area quota of 30 moose is met within the first 4-5 days of the hunt. This hunt would allow for up to 5 moose to be taken with these animals required to come from the current 30-moose quota. Any changes to hunting within this system could disrupt years of cooperative work to provide opportunity to all Alaska residents through state and federally managed hunts.

As written, this new state season would allow all disabled Alaska residents from Yakutat, or elsewhere, to hunt on state lands while only Unit 5A residents could hunt on federal lands during the same season dates. In the past, when the state lands opened, hunters have not been willing to hunt this area because the boundary is difficult to determine, and the area is small enough that an animal shot on state lands could cross onto federal lands. For Yakutat residents, this would not be a problem, because they could legally hunt in both areas. Any disabled hunter from outside of Yakutat (i.e., who is not federally qualified for this hunt) would only be able to legally hunt the state lands and would be in violation if they strayed onto federal lands.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is primarily allocative. The department recommends caution be taken so there are not negative impacts to the current hunt strategy in Unit 5A which was developed cooperatively by the department, residents of Yakutat, and federal land managers to maximize opportunity for Alaska moose hunters. The proponent has also asked for no more than 5 participants in this hunt. This would be difficult to implement outside of a drawing hunt. With the 30-moose quota, the department would need to be able to close this hunt regardless of whether the hunters who drew tags had finished their hunt. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

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Proposals 31-33

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PROPOSAL 34 – 5 AAC 92.510 (a)(3)(B). Areas closed to hunting. Open the Juneau road system closed area to big game hunting by archery only.

PROPOSED BY: Christine Ermold

WHAT WOULD THE PROPOSAL DO? This proposal would open the Juneau Road System Closed Area to archery hunting for big game. Big game species found in the area include black bear, brown bear, deer, moose, mountain goat, and wolf.

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 92.510(a)(3)(B) The following areas are closed to hunting as specified: in the Juneau area, that area between the coast and a line one-fourth of a mile inland of the following road systems is closed to the taking of big game:

(i) Glacier Highway from Mile 0 to the northern bank of Peterson Creek;
(ii) Douglas Highway from Douglas city limits to the northeast bank of Fish Creek;
(iii) Mendenhall Loop Road; and
(iv) Thane Road;

Unit 1C has a positive customary and traditional (C&T) finding for big game outside the Juneau Nonsubsistence Area (NSA). The portion of Unit 1C included in this proposal is within the Juneau NSA.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Big game hunting would be permitted within the Juneau Road System Closed Area by bow and arrow only.

BACKGROUND: The area has been closed to big game hunting since 1967. Opening an archery season in the inhabited areas of Juneau is likely to lead to trespass concerns, and the potential for wounded game to end up in neighborhoods. With the small lot size in Juneau, it would be difficult to carry out an archery hunt without animals crossing between property lines.

The proponent suggests the introduction of an archery hunt to the Juneau closed area could be a means to control an increasing bear population in the area. The department has no information that bear populations are increasing in Juneau. Changes in the number of bears in town are likely due to increased attractants (i.e., unsecured trash) in neighborhood or changes in the availability of natural foods that drive bears into town and closer to people. The department has a graduate student working on the human dimensions of bear interactions in Juneau. The research shows that Juneau residents overwhelmingly like to live around bears (93% of respondents) and that they do not want the number of bears reduced by hunting (70% of respondents).

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because of the potential for wounded game near highly populated areas. The department does not expect the adoption of this proposal to decrease human/bear conflict in Juneau.

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

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PROPOSAL 35 – 5 AAC 92.510 (a)(3)(B). Areas closed to hunting. Open the portion of the Juneau road system closed area near Thane Road to big game hunting by archery only.

PROPOSED BY: Matt Leither

WHAT WOULD THE PROPOSAL DO? This proposal would open the Thane Road portion of the Juneau Road System Closed Area to archery hunting for big game. Big game species found in the area include black bear, deer, mountain goat, and wolf.

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 92.510(a)(3)(B) The following areas are closed to hunting as specified: in the Juneau area, that area between the coast and a line one-fourth of a mile inland of the following road systems is closed to the taking of big game:

(i) Glacier Highway from Mile 0 to the northern bank of Peterson Creek;
(ii) Douglas Highway from Douglas city limits to the northeast bank of Fish Creek;
(iii) Mendenhall Loop Road; and
(iv) Thane Road;

Unit 1C has a positive customary and traditional (C&T) finding for big game outside the Juneau Nonsubsistence Area (NSA). The portion of Unit 1C included in this proposal is within the Juneau NSA.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Big game hunting by archery only would be legal along the Thane Road portion of the Juneau Road System Closed Area.

BACKGROUND: The area has been closed to big game hunting since 1967. Opening an archery season in the inhabited areas of Juneau is likely to lead to trespass concerns, and the potential for wounded game to end up in neighborhoods. With the small lot size in Juneau, it would be difficult to carry out an archery hunt without animals crossing between property lines.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal, and cautions against increasing conflicts due to wounded game traveling between adjacent private properties that may result from this proposal.

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

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PROPOSAL 36 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Shorten the ptarmigan hunting season by two weeks, to open on August 15 instead of August 1.

PROPOSED BY: Mary Glaves

WHAT WOULD THE PROPOSAL DO? This proposal would change the season dates for ptarmigan in Unit 1C from August 1–May 15 to August 15–May 15 for both resident and non-resident hunting.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.065
…

Units and Bag Limits	**Resident & Nonresident Open Season (Subsistence & General Hunts)**
Units 1 – 5, 6A, 6B, & 6C) 20 per day, 40 in possession	Aug 1 – May 15

The board has not determined if there are customary and traditional uses of ptarmigan in Unit 1C.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would delay the season start date in Unit 1C by 14 days, reducing the total season length from 287 days to 273 days. The delay to the start date will allow ptarmigan chicks to increase in size, especially chicks that hatched late in the season.

BACKGROUND: The current ptarmigan hunting season dates for Unit 1C (August 1–May 15) have been in place since the 1968-69 hunting season and the bag and possession limits have remained the same since the 1965-66 hunting season. Currently, most ptarmigan hunting seasons across the rest of Alaska begin on August 10; two exceptions are Unit 14C (September 1) and, more recently, Unit 13B (August 20).

Shifting the start date of the season to August 15 from August 1 will allow ptarmigan chicks to increase in size, especially chicks hatched late in the season. However, it is unlikely that late-hatched chicks will be comparable in size to adults after a 14-day delay to the start of the season.

There have been no research studies focused on ptarmigan in Southeast Alaska. However, data on date of hatch for willow ptarmigan from British Columbia (Weeden 1959) suggest hatch dates from these populations may be similar to those in Southcentral and Interior Alaska, where hatch generally occurs between mid- to late-June. However, hens that lose nests early in the season may renest and those nests may not hatch until early or mid-July.

Chicks that hatch late can be quite small at the start of the hunting season. It is not rare for department staff and volunteers conducting brood surveys in late July and early August to see broods with chicks approximately ½ the size of adult ptarmigan. Data on chick weights from research conducted in Southcentral and Interior Alaska support anecdotal observations of small chicks observed during brood surveys. A 3-year study (2013-2015) of willow ptarmigan in Unit 13E found that average chick weights (n = 14) were approximately 70% of adult weights (n = 6) just prior to the start of the hunting season (August 10). A separate 2-year study (2018-2019) found that average weights of rock ptarmigan chicks (n = 51) captured just prior to the start of the hunting season in Unit 25C (August 10) were approximately 75% of adult weights (n = 6). Additional data from a study in Unit 13B indicated rock ptarmigan chicks (n = 10) were approximately 95% of adult weights (n = 7) by the end of August. These data support the contention that chicks are still growing throughout August, with late-hatched chicks being substantially smaller than adults.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as there is no conservation concern regarding ptarmigan populations in Unit 1C. A 14-day delay to the start date of the ptarmigan season will allow chicks more time to increase in size; however, it is unlikely that late-hatched chicks will be comparable in size to adults.

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

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PROPOSAL 37 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Reduce the bag limit for deer in Unit 2 from 4 bucks to 3 bucks for both residents and nonresidents.

PROPOSED BY: East Prince of Wales Fish and Game Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This proposal would decrease the resident and nonresident bag limit for deer in Unit 2 from 4 bucks to 3 bucks.

WHAT ARE THE CURRENT REGULATIONS?

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

Units and Bag Limits	**Resident Open Season (Subsistence and General Hunts)**	**Nonresident Open Season**
Unit 2 4 bucks	Aug. 1 – Dec. 31	Aug. 1 – Dec. 31

There is a positive intensive management finding for deer in Unit 2 with population and harvest objectives of 71,000 and 2,700, respectively.

There is a positive customary and traditional use finding for deer in Unit 2, with an amount reasonably necessary for subsistence (ANS) of 1,500 – 1,600 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would decrease the resident and nonresident bag limit for Sitka black-tail deer in Unit 2 from 4 bucks to 3 bucks. If adopted, this may reduce harvest.

BACKGROUND: Conversations with Unit 2 hunters suggest that harvest opportunity for and access to deer have become more difficult due to a smaller deer population and access issues. Logging and forest stand succession have negatively impacted deer habitat and hunter access in much of Unit 2. This proposal specifically states that Unit 2 residents "are concerned about the steady and significant decline in deer numbers and availability for subsistence food resources." Unit 2 deer harvest declined from regulatory year (RY) 2016 to RY2023 but increased slightly in RY2024 (Fig. 1). There were fewer hunters and fewer deer taken per hunter from RY2016–RY2024, which is reflected in the lower Unit 2 deer harvest numbers.

Deer harvest in Unit 2 has been below the objective in all years except RY2001 and from RY2005 through RY2016 (Fig. 1). Deer harvest in Unit 2 has remained within or above the ANS range since RY1997, except in RY2023 (Fig. 2). The bag limit for deer in Unit 2 was 4 deer prior to RY1972 and was lowered to 3 deer from RY1972 to RY1977. A restriction for harvesting only antlered deer was put in place from RY1978 to RY1986, but it was removed after only one year, RY1987. The bag limit has remained unchanged at 4 bucks from RY1988 to present.

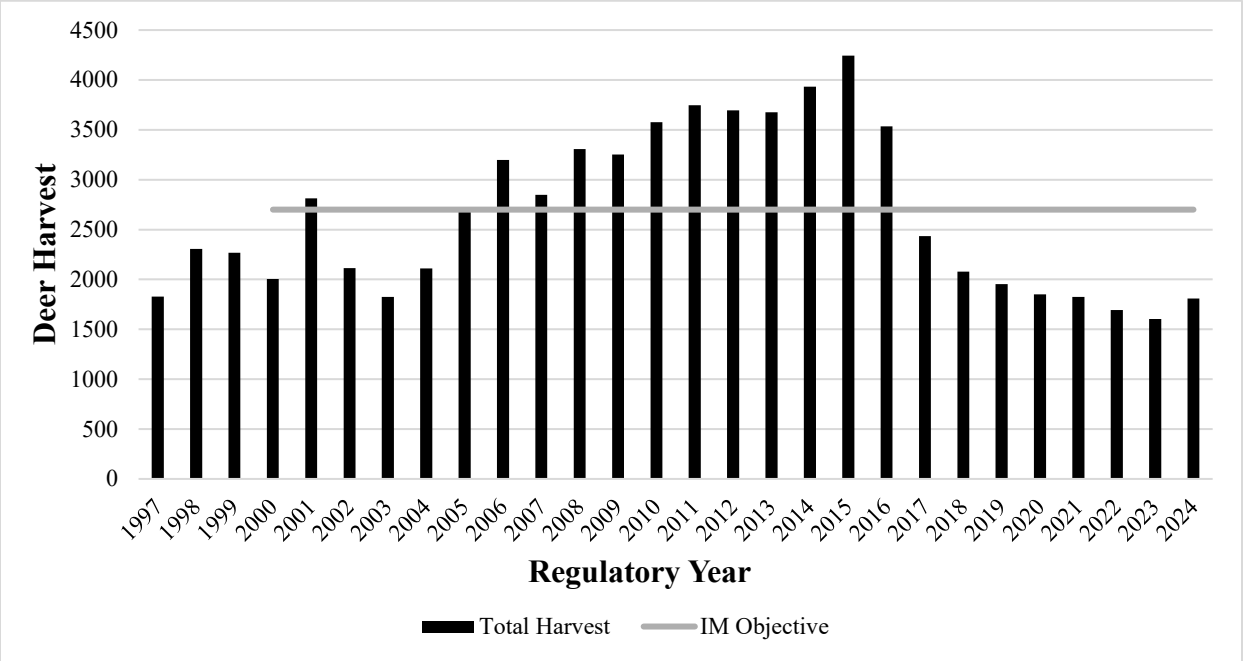

Figure 1. Harvest of deer in comparison to the intensive management harvest objective of 2,700 deer in Unit 2, RY1997 to RY2024.

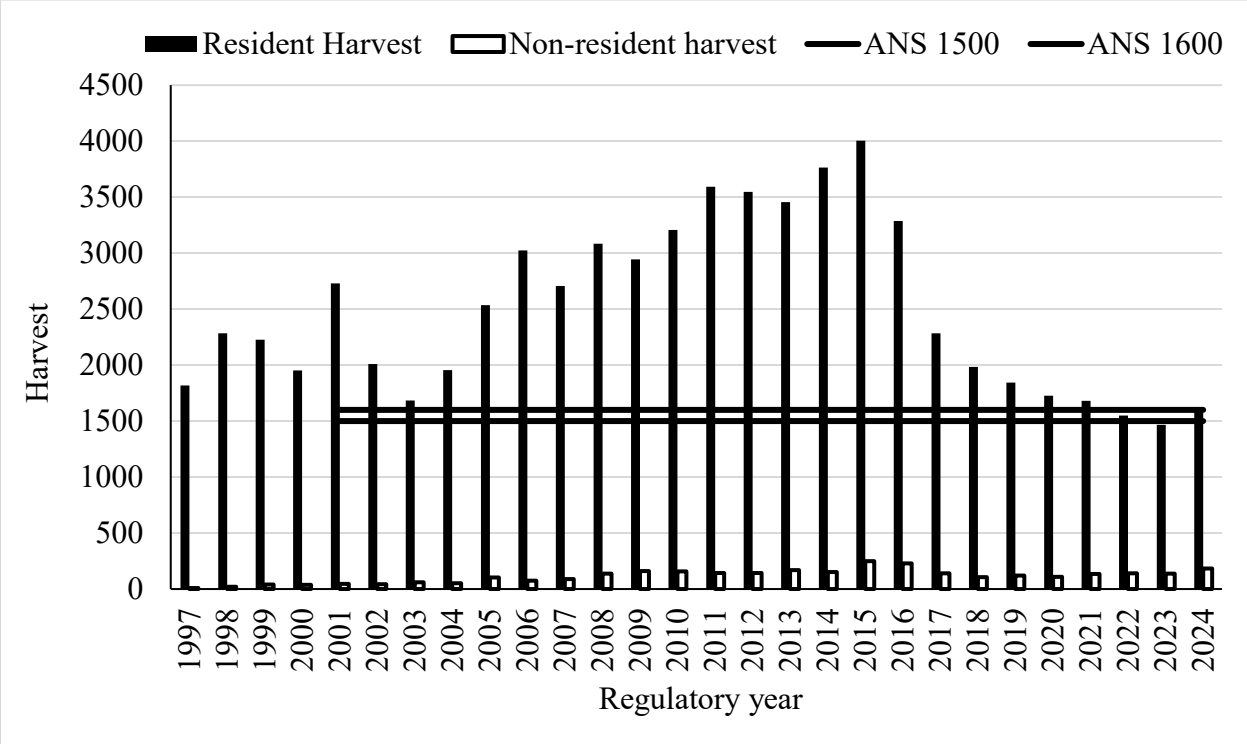

Figure 2. Resident and nonresident deer harvest from RY1997–RY2024 in Unit 2, Southeast Alaska.

The commercial logging legacy on Unit 2 lands has altered deer habitat and hunter access. Roads built to support logging in Unit 2 have resulted in the highest density of roads in Southeast Alaska, with approximately 2,500 miles (4,000 km) of drivable roads. This has increased hunter access. Logging activity has also reduced winter deer habitat in north central Prince of Wales Island (POW) by 46% and in south POW by 18%. Old-growth forests provide important deer wintering habitat. Deer seek refuge from deep snow by occupying uneven-aged old-growth forests, which intercept falling snow in the canopy and retain important ground-level forage. Uniform-aged second-growth forests do not intercept snow as well, reducing the accessibility of ground-level forage to deer. Removing important deer wintering habitat has a negative long-term impact on deer populations and has likely contributed to the decline of the Unit 2 deer population. Clearcut logging can result in abundant ground-level forage for deer and other species in the years immediately following the clearcut. However, the initial flush of vegetation is succeeded by a "stem exclusion" stage when a dense tree canopy limits light and other resources and results in the death of weaker trees and a lack of new seedling establishment. This stage of forest growth is largely unproductive for many species including deer and can last for 150 years or longer. As of 2018, approximately 360,000 acres of old-growth has been harvested on Prince of Wales; 169,000 of those 360,000 acres are currently in stem-exclusion stage and

another 115,000 acres are close to this stage. Studies on Prince of Wales Island demonstrated that deer densities in managed lands logged for more than 30 years support 7 deer/km^2 compared to unmanaged (old-growth) lands which support 12 deer/km^2. Clearcuts also impact hunter access to hunting areas. Once clearcuts have grown enough to obstruct visibility, hunters tend to avoid these areas as they become difficult to travel through and support fewer deer. The succession of clearcut forests may be contributing to the increased effort required for Unit 2 hunters to harvest deer in recent years.

Deer populations in Unit 2 have historically been measured using various methods including aerial alpine surveys (Fig. 3), pellet counts (Table 1), and hunter harvest and effort data from harvest reports (Fig. 4). Aerial surveys were conducted on northern POW from 2016-2019 and central POW from 2017-2019. Results from aerial surveys show an increase in deer abundance in central POW, and a slight decrease in deer abundance in northern POW during the survey periods (Fig. 3). However, the department discontinued aerial alpine survey efforts due to the lack of clear evidence of how these surveys relate to overall deer abundance. Figure 1 describes pellet transect plots with long-term data trends. The department conducted pellet transects in Unit 2 from 1981 to 2019. However, due to the insensitive outputs of pellet transect data, the department discontinued pellet surveys in Southeast Alaska after RY2020.

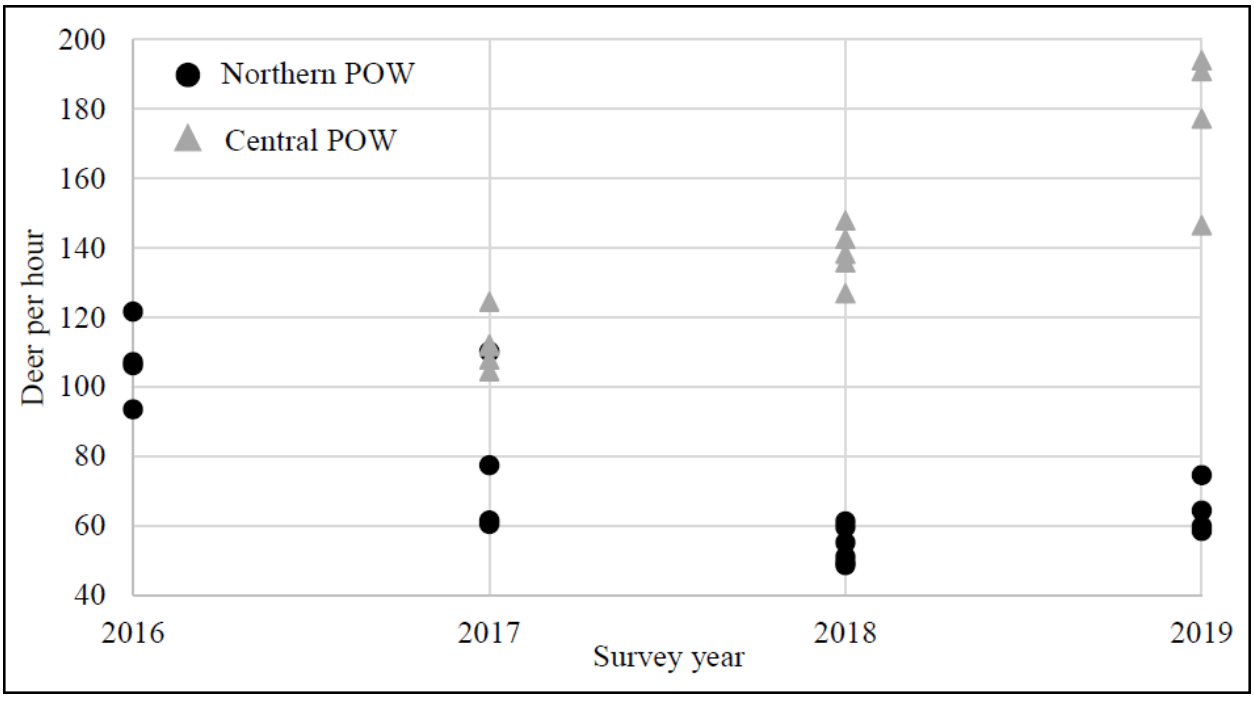

Figure 3. Number of deer observed per hour of flight during aerial alpine surveys on northern and central Prince of Wales (POW) Island, Southeast Alaska, from 2016 to 2019. Central POW was not surveyed in 2016, and aerial surveys were not conducted in Unit 2 prior to 2016.

Since 2020, the department has used hunter harvest and effort data from harvest reports as an index of abundance of the deer population. The average number of days it took a hunter to

harvest a deer (days per deer) is used by the department as a measure of trend in deer abundance. From RY2004 to RY2016, hunter days per deer averaged 3.4, and increased to an average of 4.9 days per deer between RY2017 to RY2024 (Fig. 4). In addition, based on the raw harvest data, there were fewer hunters, and fewer deer harvested per hunter, which also contributed to the decline in harvest. The increased amount of effort required to harvest a deer from RY2017 to RY2024 is similar to that which was reported between RY1997 to RY2003. However, from RY2004 to RY2016, the deer harvest rebounded without management intervention, and supported record harvests from RY2010 to RY2016.

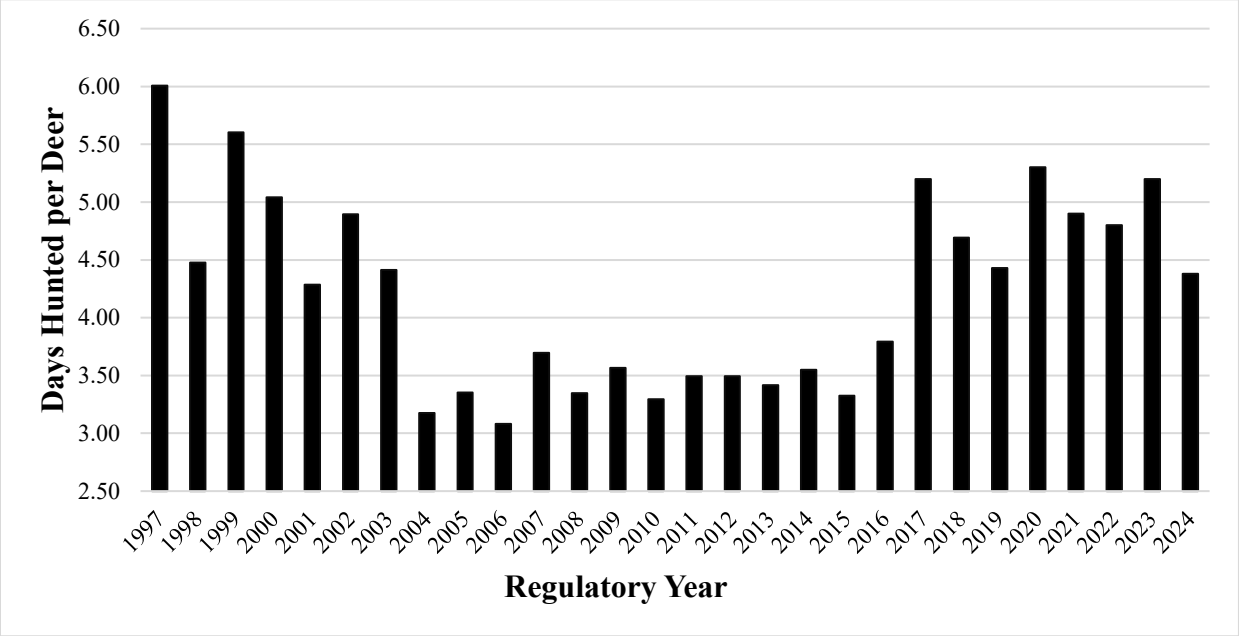

Figure 4. Average days hunted per deer harvested for Unit 2, Southeast Alaska, from RY1997 to RY2024.

The adoption of this proposal would have limited impact on the harvest of deer in Unit 2 by both non federally qualified subsistence users (NFQU) Alaska resident hunters and federally qualified subsistence users (FQU). Although most Unit 2 deer hunters harvest 1 or 2 deer, about 8% of all Unit 2 deer hunters harvested 4 or more deer from RY1997 to RY2024 (Fig. 5). The proportion of hunters that harvest 4 or more deer declined in recent years, from a high in RY2011 of 14.8% to a low in RY2023 of 3.4%. This decline may be due in part to the 2018 restriction to a 2-buck bag limit for NFQs who hunt deer on federal lands in Unit 2 and the availability and/or accessibility of deer in preferred hunting areas.

FQU from Units 1–5 hunting in Unit 2 under federal regulations on federal land, which comprises 80% of the land area of Unit 2, may harvest up to 5 deer in Unit 2, one of which may be a doe. If this proposal were adopted, these hunters would be restricted from harvesting their fourth and fifth deer on non-federal land, but may mitigate that impact by harvesting deer on nearby federal lands. NFQU and FQU from outside Units 1–5 who hunt deer in Unit 2 on federal

land currently have a 2-buck bag limit (since 2018), and this proposal would restrict these hunters from harvesting their fourth buck on non-federal lands.

This proposal would mostly affect NFQ hunting on non-federal lands in Unit 2. The proportion of harvest from this subset of hunters that harvest 4 bucks accounts for 0.3% of all the Unit 2 deer harvest since RY2018–RY2024 (Fig. 6). Therefore, the adoption of this proposal would prevent roughly 6 bucks from being harvested annually. FQUs would still have the opportunity to harvest their fourth deer on federal lands in Unit 2, so impacts to FQUs would likely be low.

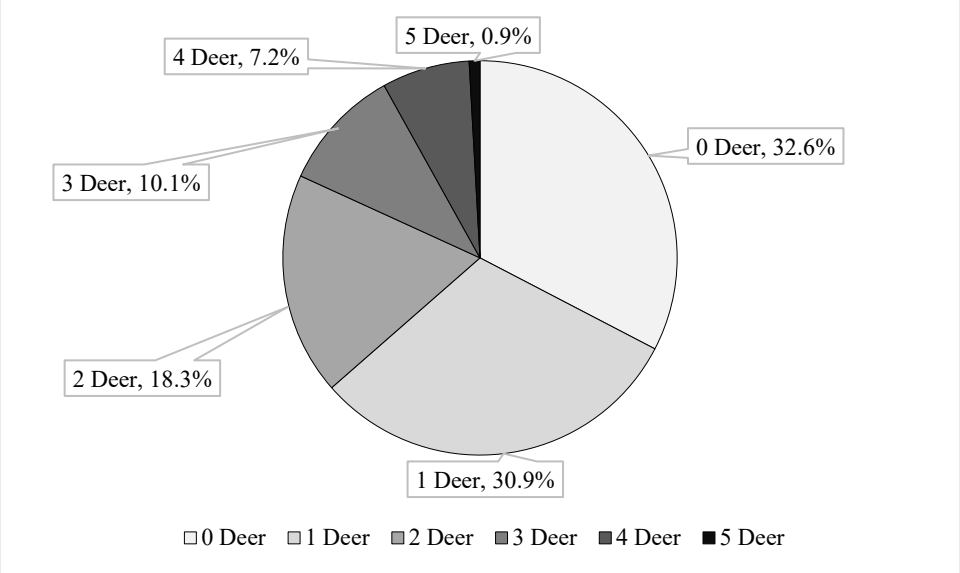

Figure 5. The average percentage of hunters who harvested 1, 2, 3, 4, and 5 deer in Unit 2 from RY1997 to RY2024. Only FQUs from Units 1–5 can legally harvest a fifth deer on federal lands in Unit 2.

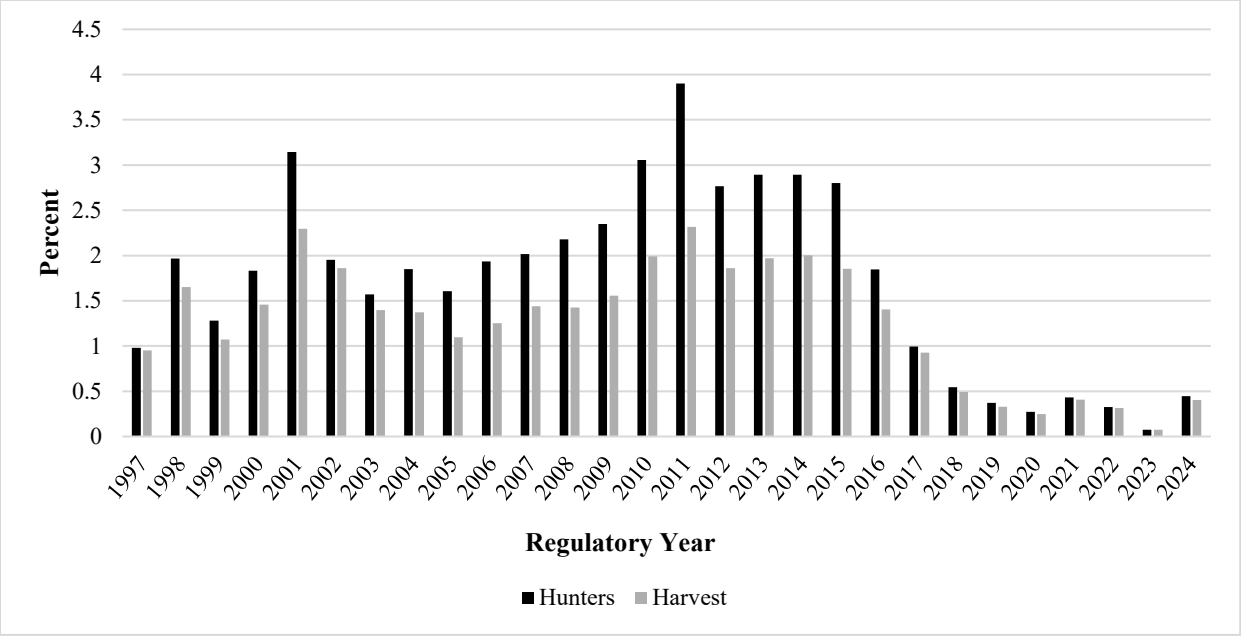

Figure 6. Percent of Unit 2 deer hunters who are NFQ or FQUs from outside Units 1-5 that harvested 4 deer (black) and percent of deer harvest represented by these hunters (gray) from RY1997 to RY2024. NFQs and FQUs from outside Units 1-5 have been restricted to a 2-buck bag limit when hunting on federal lands in Unit 2 since 2018.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it unnecessarily limits opportunity and is likely to have minimal impacts on the harvest of Unit 2 deer. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

NFQs and FQUs from outside Units 1-5 hunting in Unit 2 are already restricted to a 2-buck bag limit when hunting on federal lands.

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

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PROPOSAL 38 - 5 AAC 85.030. Hunting seasons and bag limits for deer. Reduce the resident bag limit for deer in Unit 2 from 4 bucks to 3 bucks.

PROPOSED BY: Craig Fish and Game Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This proposal would decrease the resident bag limit for deer in Unit 2 from 4 bucks to 3 bucks.

WHAT ARE THE CURRENT REGULATIONS?

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 2 4 bucks	Aug. 1 – Dec. 31	Aug 1 – Dec. 31

There is a positive intensive management finding for deer in Unit 2 with population and harvest objectives of 71,000 and 2,700, respectively.

There is a positive customary and traditional use determination for deer in Unit 2 and an amount reasonably necessary for subsistence of 1,500-1,600 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would decrease the resident bag limit for deer in Unit 2 from 4 bucks to 3 bucks, keeping the nonresident bag limit unchanged at 4 bucks. It would also provide more opportunity for harvest of deer in Unit 2 to nonresidents than is currently afforded to residents. If adopted, this proposal is expected to have a negligible impact on Unit 2 deer harvest and would unnecessarily restrict resident harvest opportunity.

BACKGROUND: Conversations with Unit 2 hunters suggest that harvest opportunity for and access to deer have become more difficult due to a smaller deer population and access issues. Logging and forest stand succession have negatively impacted deer habitat and hunter access in much of Unit 2. This proposal specifically states that Unit 2 residents "are concerned about the steady and significant decline in deer numbers and availability for subsistence food resources." Unit 2 deer harvest declined from regulatory year (RY) 2016 to RY2023 but increased slightly in RY2024 (Fig. 1). There were fewer hunters and fewer deer taken per hunter from RY2016–RY2024, which is reflected in the lower Unit 2 deer harvest numbers.

Deer harvest in Unit 2 has been below the objective in all years except RY2001 and from RY2005 through RY2016 (Fig. 1). Deer harvest in Unit 2 has remained within or above the ANS range since RY1997, except in RY2023 (Fig. 2). The bag limit for deer in Unit 2 was 4 deer prior to RY1972 and was lowered to 3 deer from RY1972 to RY1977. A restriction for harvesting only antlered deer was put in place from RY1978 to RY1986, but it was removed after only one year,

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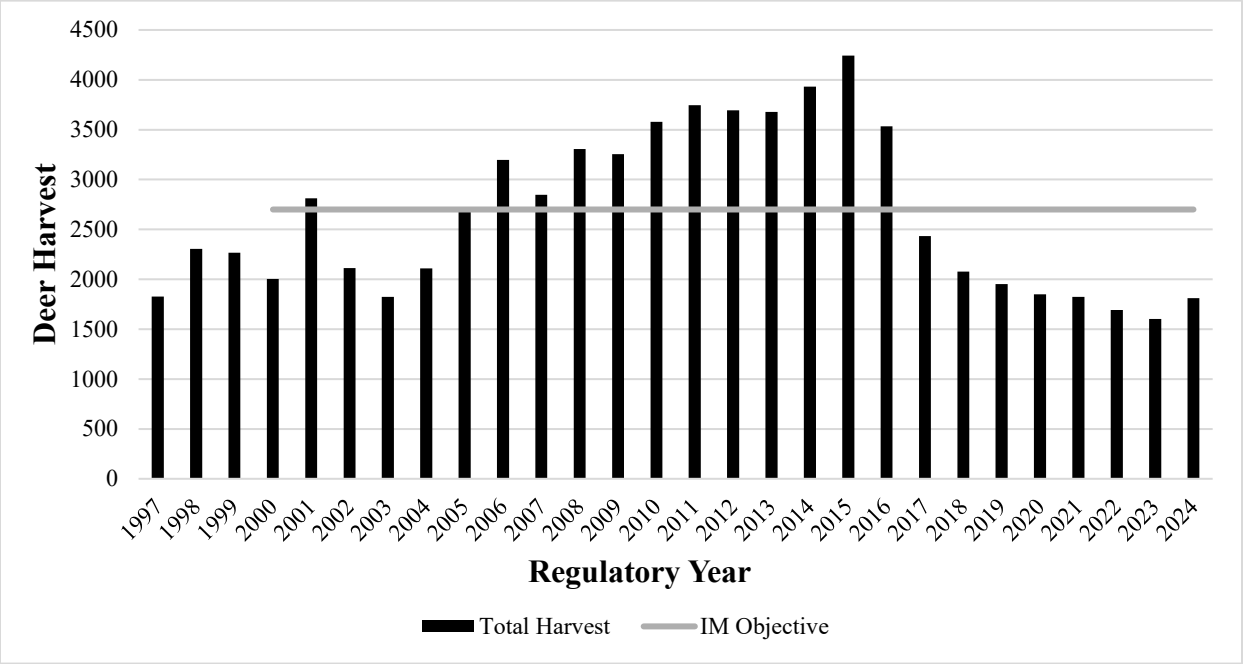

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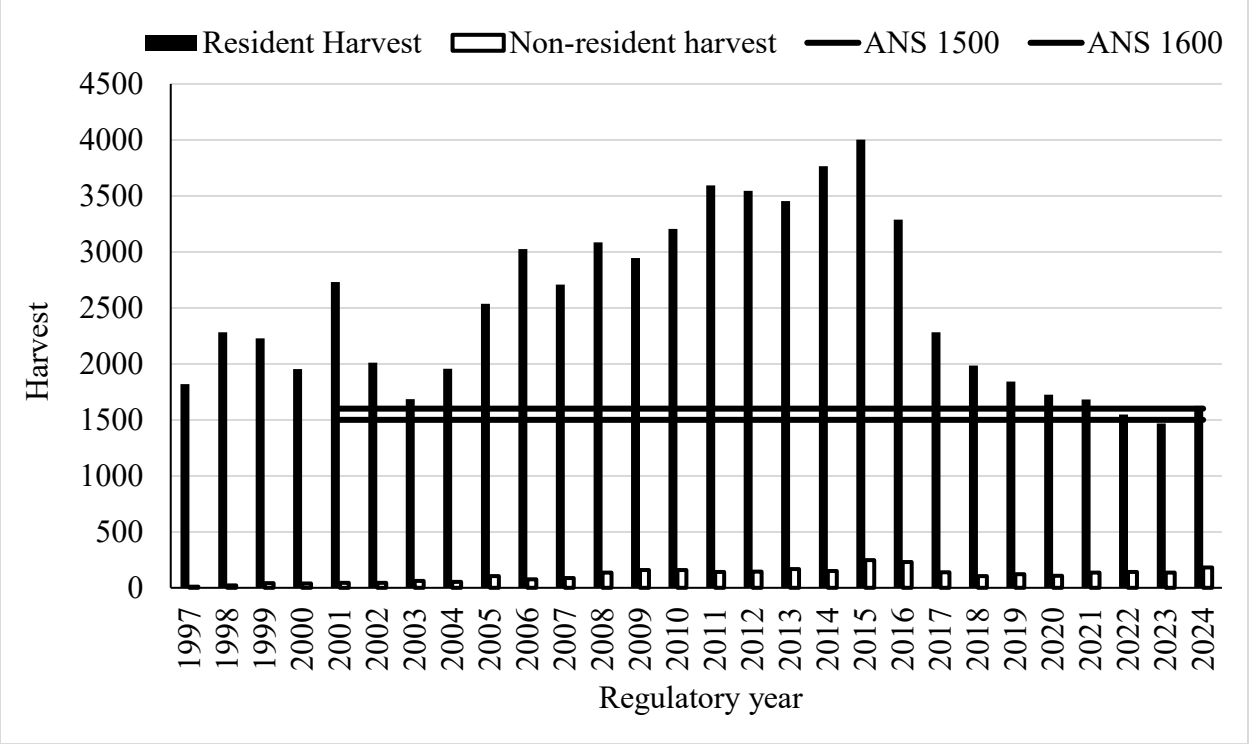

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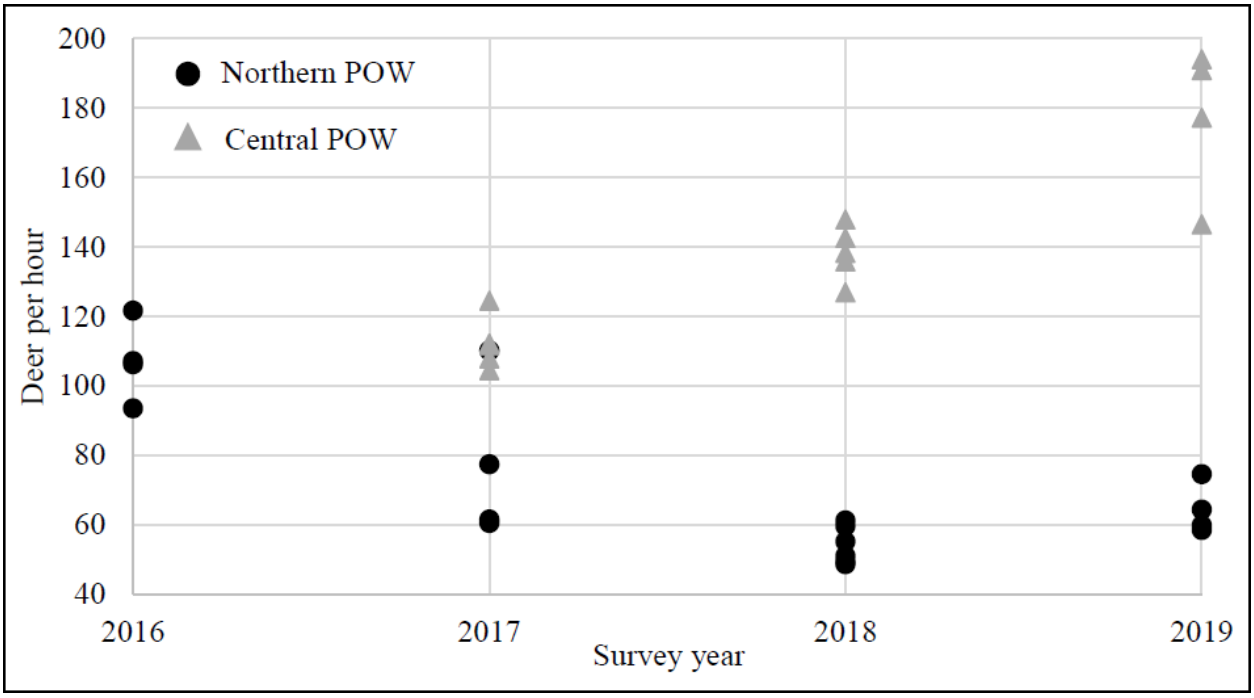
Deer populations in Unit 2 have historically been measured using various methods including aerial alpine surveys (Fig. 3), pellet counts (Table 1), and hunter harvest and effort data from harvest reports (Fig. 4). Aerial surveys were conducted on northern POW from 2016-2019 and central POW from 2017-2019. Results from aerial surveys show an increase in deer abundance in central POW, and a slight decrease in deer abundance in northern POW during the survey periods (Fig. 3). However, the department discontinued aerial alpine survey efforts due to the lack of clear evidence of how these surveys relate to overall deer abundance. Figure 1 describes pellet transect plots with long-term data trends. The department conducted pellet transects in Unit 2 from 1981 to 2019. However, due to the insensitive outputs of pellet transect data, the department discontinued pellet surveys in Southeast Alaska after RY2020.



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Since 2020, the department has used hunter harvest and effort data from harvest reports as an index of abundance of the deer population. The average number of days it took a hunter to harvest a deer (days per deer) is used by the department as a measure of trend in deer abundance. From RY2004 to RY2016, hunter days per deer averaged 3.4, and increased to an average of 4.9 days per deer between RY2017 to RY2024 (Fig. 4). In addition, based on the raw harvest data, there were fewer hunters, and fewer deer harvested per hunter, which also contributed to the decline in harvest. The increased amount of effort required to harvest a deer from RY2017 to RY2024 is similar to that which was reported between RY1997 to RY2003. However, from RY2004 to RY2016, the deer harvest rebounded without management intervention, and supported record harvests from RY2010 to RY2016.

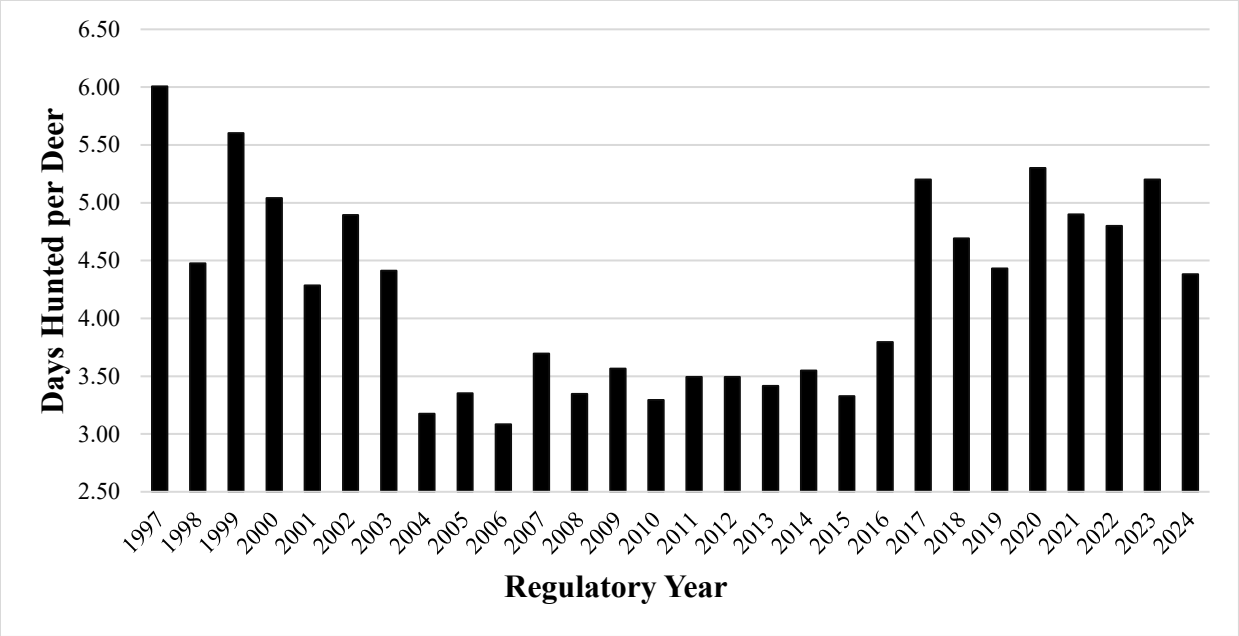

Figure 4. Average days hunted per deer harvested for Unit 2, Southeast Alaska, from RY1997 to RY2024.

The adoption of this proposal would have limited impact on the harvest of deer in Unit 2 by both non federally qualified subsistence users (NFQU) Alaska resident hunters and federally qualified subsistence users (FQU). Although most Unit 2 deer hunters harvest 1 or 2 deer, about 8% of all Unit 2 deer hunters harvested 4 or more deer from RY1997 to RY2024 (Fig. 5). The proportion of hunters that harvest 4 or more deer declined in recent years, from a high in RY2011 of 14.8% to a low in RY2023 of 3.4%. This decline may be due in part to the 2018 restriction to a 2-buck bag limit for NFQs who hunt deer on federal lands in Unit 2 and the availability and/or accessibility of deer in preferred hunting areas.

FQU from Units 1–5 hunting in Unit 2 under federal regulations on federal land, which comprises 80% of the land area of Unit 2, may harvest up to 5 deer in Unit 2, one of which may be a doe. If this proposal were adopted, these hunters would be restricted from harvesting their fourth and fifth deer on non-federal land, but may mitigate that impact by harvesting deer on nearby federal lands. NFQU and FQU from outside Units 1–5 who hunt deer in Unit 2 on federal land currently have a 2-buck bag limit (since 2018), and this proposal would restrict these hunters from harvesting their fourth buck on non-federal lands.

This proposal would mostly affect NFQ hunting on non-federal lands in Unit 2. The proportion of harvest from this subset of hunters that harvest 4 bucks accounts for 0.3% of all the Unit 2 deer harvest since RY2018–RY2024 (Fig. 6). Therefore, the adoption of this proposal would prevent roughly 6 bucks from being harvested annually. FQUs would still have the opportunity to harvest their fourth deer on federal lands in Unit 2, so impacts to FQUs would likely be low.

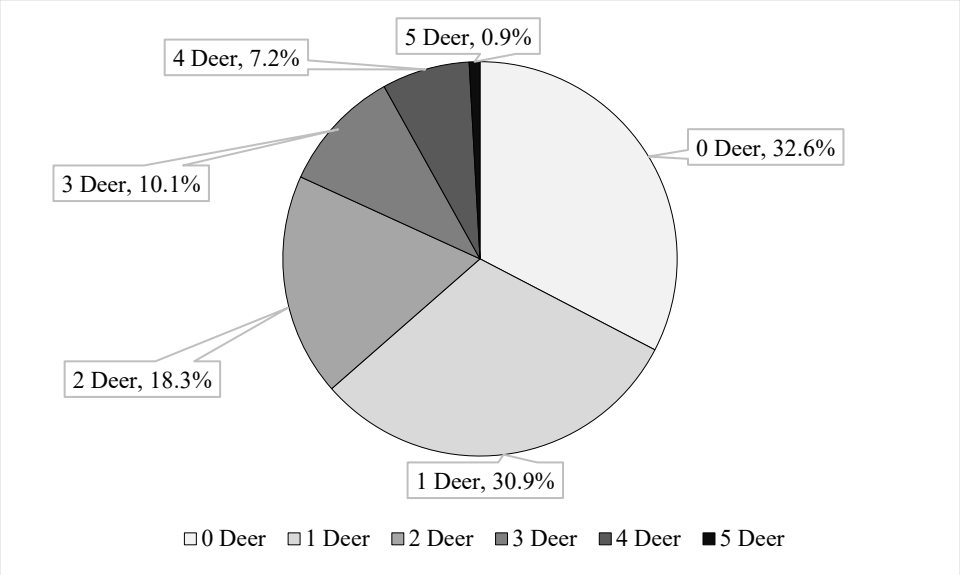

Figure 5. The average percentage of hunters who harvested 1, 2, 3, 4, and 5 deer in Unit 2 from RY1997 to RY2024. Only FQUs from Units 1–5 can legally harvest a fifth deer in Unit 2.

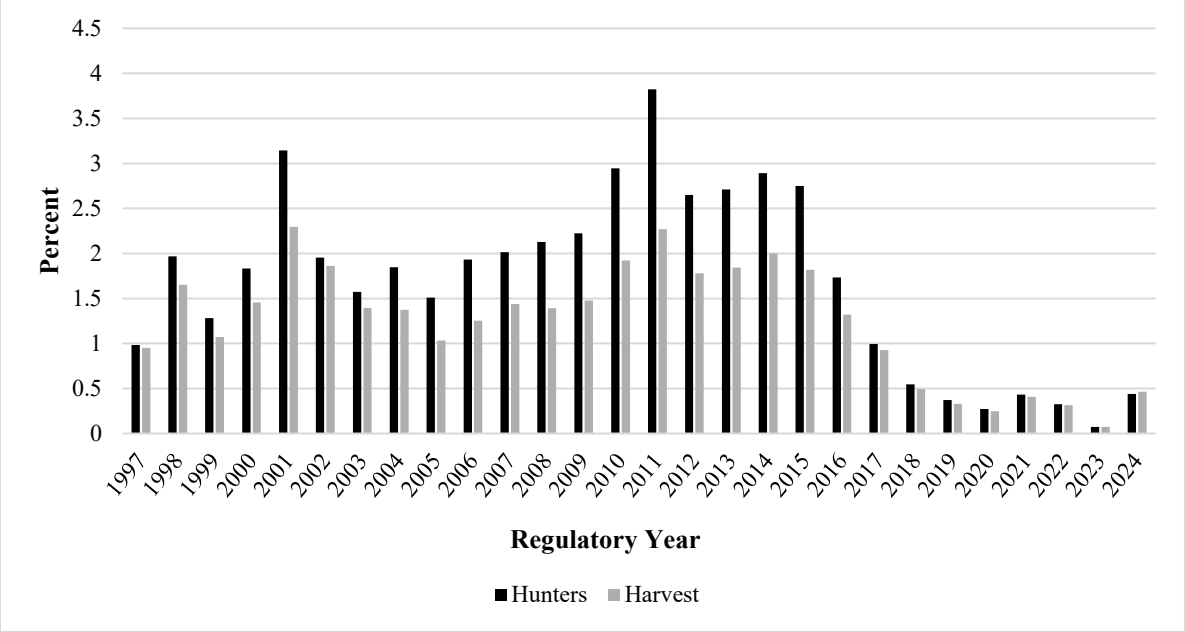

Figure 6. Percent of Unit 2 deer hunters who are NFQ Alaska residents or FQUs from outside Units 1-5 that harvested 4 deer (black) and percent of deer harvest represented by these hunters (gray) from RY2015 to RY2024. NFQs and FQUs from outside Units 1-5 have been restricted to a 2-buck bag limit when hunting on federal lands in Unit 2 since 2018.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it would provide a preference to nonresidents over residents for the harvest of deer in Unit 2. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

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PROPOSAL 39 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Reduce the bag limit for deer in Unit 2 from 4 bucks to 2 bucks for both residents and nonresidents.

PROPOSED BY: East Prince of Wales Fish and Game Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This proposal would decrease the resident and nonresident bag limit for deer in Unit 2 from 4 bucks to 2 bucks.

WHAT ARE THE CURRENT REGULATIONS?

Resident

Units and Bag Limits	Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 2		
4 bucks	Aug. 1 – Dec. 31	Aug. 1 – Dec. 31

There is a positive intensive management finding for deer in Unit 2 with population and harvest objectives of 71,000 and 2,700, respectively.

There is a positive customary and traditional use determination for deer in Unit 2 and an amount reasonably necessary for subsistence of 1,500-1,600 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would decrease the resident and nonresident bag limit for Sitka black-tail deer in Unit 2 from 4 bucks to 2 bucks. Although most Unit 2 deer hunters harvest only 1 or 2 bucks, 18.2% of all Unit 2 deer hunters have harvested 3 or more deer from regulatory year (RY) 1997 – RY2024 (Fig. 4). However, the majority of this harvest since RY2018 is from federally qualified users (FQUs). FQUs who live in Units 1–5 and who hunt under federal regulations on federal lands would be largely unaffected by this proposal if adopted. Non-federally qualified users (NFQs) and FQUs from outside Units 1–5 have already been restricted to a 2-buck bag limit when hunting on federal lands in Unit 2 since 2018. Therefore, if adopted, this proposal is expected to

have a negligible impact on Unit 2 deer harvest and would unnecessarily limit opportunity for hunters looking to harvest their third and fourth buck on non-federal lands.

BACKGROUND: Conversations with Unit 2 hunters suggest that harvest opportunity for and access to deer have become more difficult due to a smaller deer population and access issues. Logging and forest stand succession have negatively impacted deer habitat and hunter access in much of Unit 2. This proposal specifically states that Unit 2 residents "are concerned about the steady and significant decline in deer numbers and availability for subsistence food resources." Unit 2 deer harvest declined from regulatory year (RY) 2016 to RY2023 but increased slightly in RY2024 (Fig. 1). There were fewer hunters and fewer deer taken per hunter from RY2016–RY2024, which is reflected in the lower Unit 2 deer harvest numbers.

Deer harvest in Unit 2 has been below the objective in all years except RY2001 and from RY2005 through RY2016 (Fig. 1). Deer harvest in Unit 2 has remained within or above the ANS range since RY1997, except in RY2023 (Fig. 2). The bag limit for deer in Unit 2 was 4 deer prior to RY1972 and was lowered to 3 deer from RY1972 to RY1977. A restriction for harvesting only antlered deer was put in place from RY1978 to RY1986, but it was removed after only one year, RY1987. The bag limit has remained unchanged at 4 bucks from RY1988 to present.

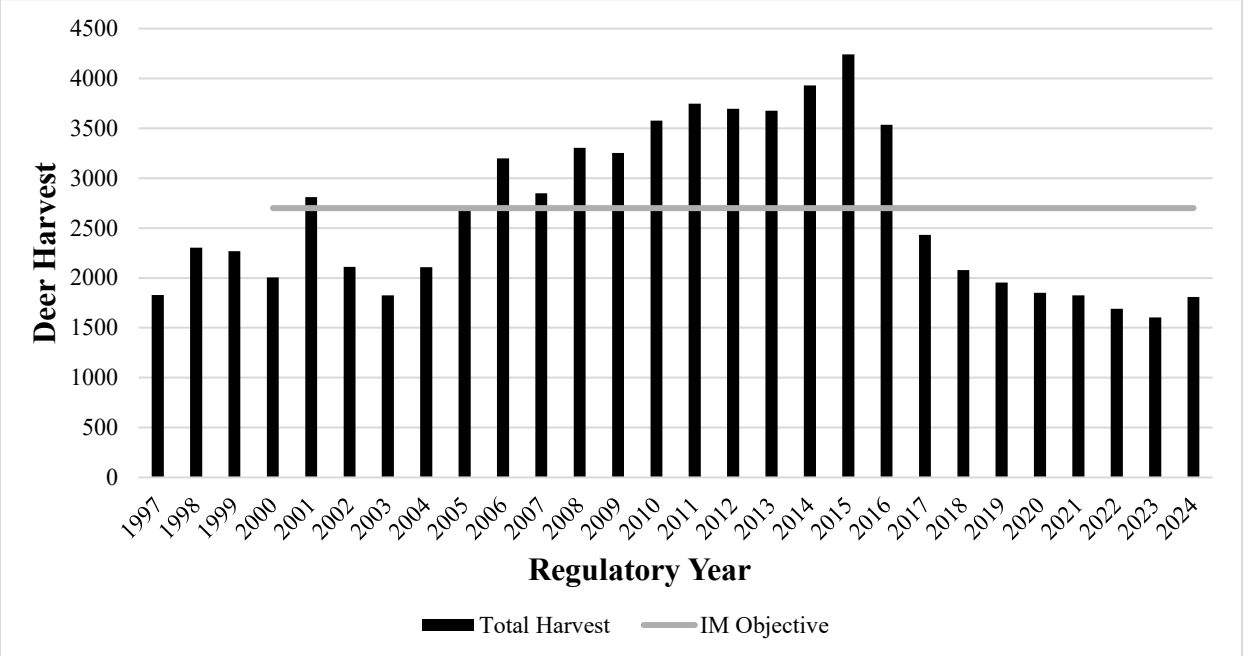

Figure 1. Harvest of deer in comparison to the intensive management harvest objective of 2,700 deer in Unit 2, RY1997 to RY2024.

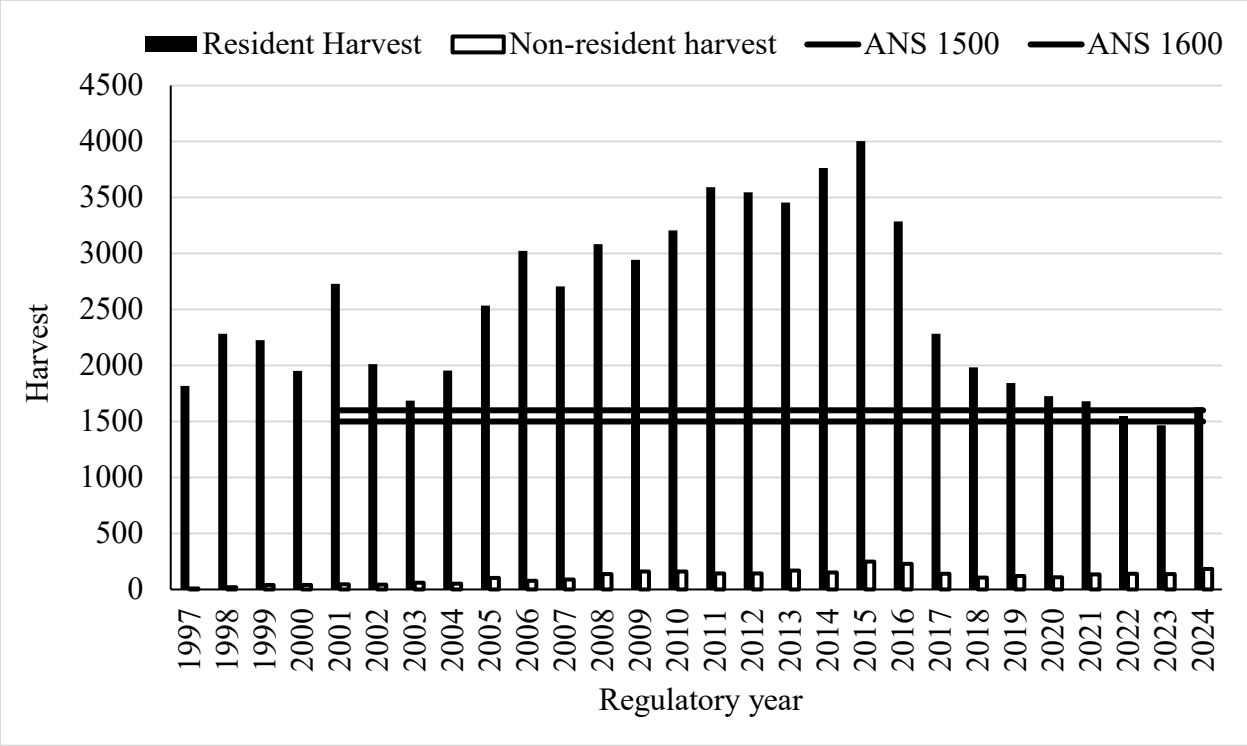

Figure 2. Resident and nonresident deer harvest from RY1997–RY2024 in Unit 2, Southeast Alaska.

The commercial logging legacy on Unit 2 lands has altered deer habitat and hunter access. Roads built to support logging in Unit 2 have resulted in the highest density of roads in Southeast Alaska, with approximately 2,500 miles (4,000 km) of drivable roads. This has increased hunter access. Logging activity has also reduced winter deer habitat in north central Prince of Wales Island (POW) by 46% and in south POW by 18%. Old-growth forests provide important deer wintering habitat. Deer seek refuge from deep snow by occupying uneven-aged old-growth forests, which intercept falling snow in the canopy and retain important ground-level forage. Uniform-aged second-growth forests do not intercept snow as well, reducing the accessibility of ground-level forage to deer. Removing important deer wintering habitat has a negative long-term impact on deer populations and has likely contributed to the decline of the Unit 2 deer population. Clearcut logging can result in abundant ground-level forage for deer and other species in the years immediately following the clearcut. However, the initial flush of vegetation is succeeded by a "stem exclusion" stage when a dense tree canopy limits light and other resources and results in the death of weaker trees and a lack of new seedling establishment. This stage of forest growth is largely unproductive for many species including deer and can last for 150 years or longer. As of 2018, approximately 360,000 acres of old-growth has been harvested on Prince of Wales; 169,000 of those 360,000 acres are currently in stem-exclusion stage and another 115,000 acres are close to this stage. Studies on Prince of Wales Island demonstrated that deer densities in managed lands logged for more than 30 years support 7 deer/km^2 compared to

unmanaged (old-growth) lands which support 12 deer/km^2. Clearcuts also impact hunter access to hunting areas. Once clearcuts have grown enough to obstruct visibility, hunters tend to avoid these areas as they become difficult to travel through and support fewer deer. The succession of clearcut forests may be contributing to the increased effort required for Unit 2 hunters to harvest deer in recent years.

Deer populations in Unit 2 have historically been measured using various methods including aerial alpine surveys (Fig. 3), pellet counts (Table 1), and hunter harvest and effort data from harvest reports (Fig. 4). Aerial surveys were conducted on northern POW from 2016-2019 and central POW from 2017-2019. Results from aerial surveys show an increase in deer abundance in central POW, and a slight decrease in deer abundance in northern POW during the survey periods (Fig. 3). However, the department discontinued aerial alpine survey efforts due to the lack of clear evidence of how these surveys relate to overall deer abundance. Figure 1 describes pellet transect plots with long-term data trends. The department conducted pellet transects in Unit 2 from 1981 to 2019. However, due to the insensitive outputs of pellet transect data, the department discontinued pellet surveys in Southeast Alaska after RY2020.

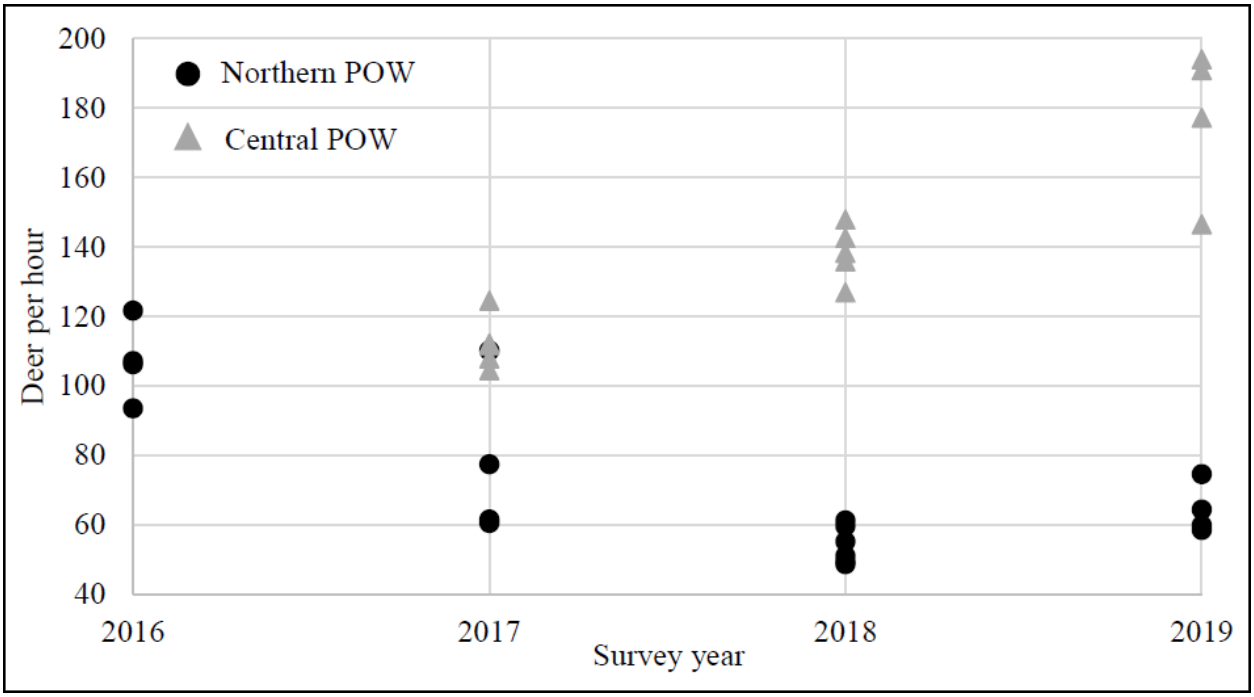

Figure 3. Number of deer observed per hour of flight during aerial alpine surveys on northern and central Prince of Wales (POW) Island, Southeast Alaska, from 2016 to 2019. Central POW was not surveyed in 2016, and aerial surveys were not conducted in Unit 2 prior to 2016.

Since 2020, the department has used hunter harvest and effort data from harvest reports as an index of abundance of the deer population. The average number of days it took a hunter to harvest a deer (days per deer) is used by the department as a measure of trend in deer abundance. From RY2004 to RY2016, hunter days per deer averaged 3.4, and increased to an average of 4.9

days per deer between RY2017 to RY2024 (Fig. 4). In addition, based on the raw harvest data, there were fewer hunters, and fewer deer harvested per hunter, which also contributed to the decline in harvest. The increased amount of effort required to harvest a deer from RY2017 to RY2024 is similar to that which was reported between RY1997 to RY2003. However, from RY2004 to RY2016, the deer harvest rebounded without management intervention, and supported record harvests from RY2010 to RY2016.

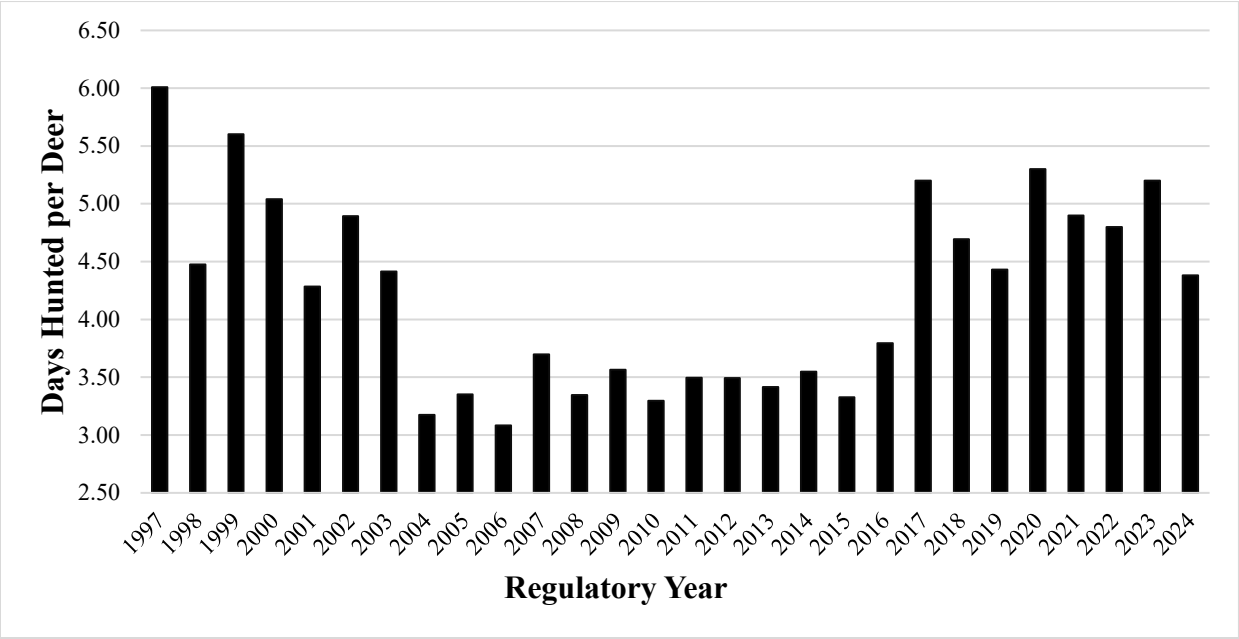

Figure 4. Average days hunted per deer harvested for Unit 2, Southeast Alaska, from RY1997 to RY2024.

The adoption of this proposal would have limited impact on the harvest of deer in Unit 2 by both non federally qualified subsistence users (NFQU) and federally qualified subsistence users (FQU). Although most Unit 2 deer hunters harvest 1 or 2 deer, about 18% of all Unit 2 deer hunters harvested 3 or more deer from RY1997 to RY2024 (Fig. 5). The proportion of hunters that harvest 3 or more deer declined in recent years, from a high in RY2011 of 29.4% to a low in RY2023 of 9.5%. This decline may be due in part to the 2018 restriction to a 2-buck bag limit on NFQs who hunt deer on federal lands in Unit 2 and the availability and/or accessibility of deer in preferred hunting areas.

FQUs from Units 1-5 hunting in Unit 2 under federal regulations on federal land, which makes up 80% of the land area of Unit 2, may harvest up to 5 deer in Unit 2, one of which may be a doe – if this proposal were adopted, these hunters would be restricted from harvesting their third or fourth deer on non-federal land, but may mitigate these impacts by harvesting deer on nearby federal lands. NFQs and FQUs from outside Units 1-5 who hunt deer in Unit 2 on federal land currently have a 2-buck bag limit (since 2018), and this proposal would restrict these hunters from harvesting their third or fourth buck on non-federal land. The proportion of Unit 2 deer hunters who are NFQs or FQUs from outside Units 1-5 who hunt on non-federal land in Unit 2 to

harvest their third or fourth bucks is roughly 1.3% and accounts for 1.5% of overall Unit 2 deer harvest since RY2018 (Fig. 6) and the adoption of this proposal would prevent roughly 28 bucks from being harvested annually if these hunters are limited to 2 bucks instead of 4 bucks. Although an unknown number of FQUs from Units 1-5 may harvest their third or fourth deer on non-federal lands, they would still have the opportunity to harvest these deer on federal lands in Unit 2, so impacts to FQUs would likely be low.

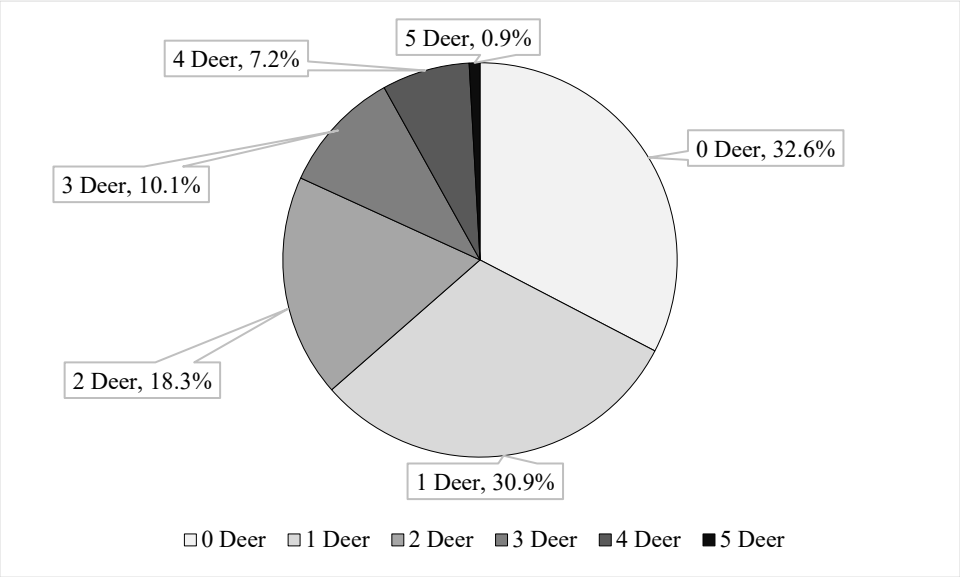

Figure 5. The average percentage of hunters who harvested 1, 2, 3, 4, and 5 deer in Unit 2 from RY1997 to RY2024. Only FQUs from Units 1-5 can legally harvest a fifth deer in Unit 2.

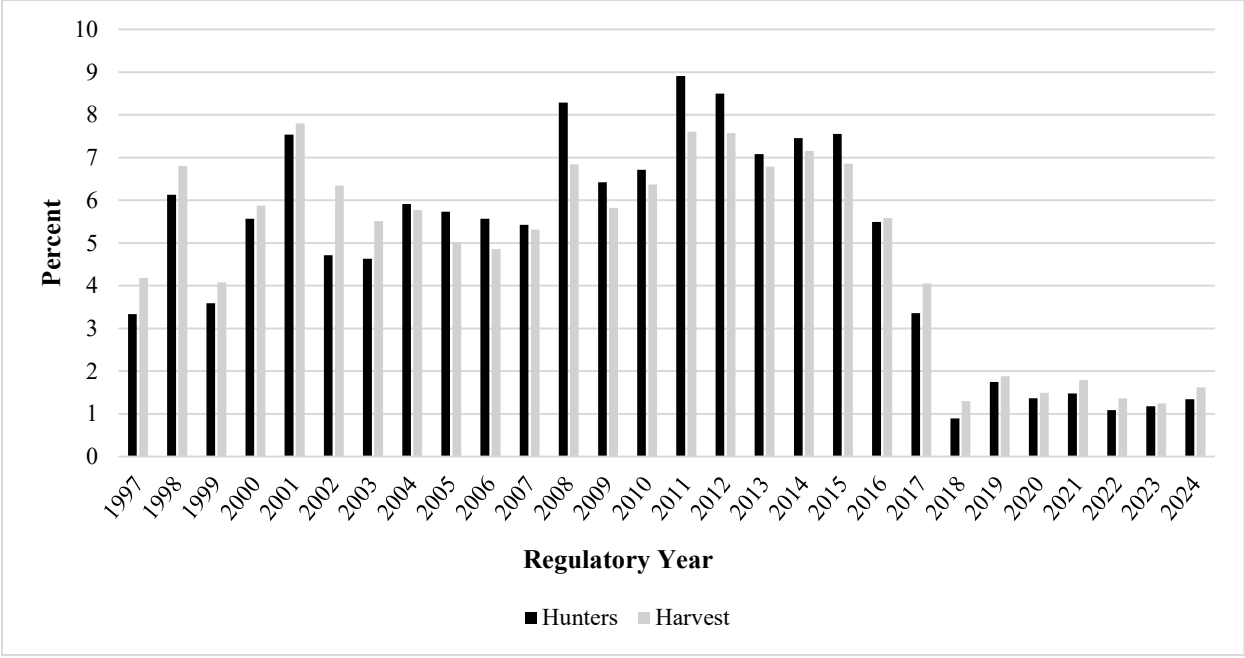

Figure 6. The percent of all Unit 2 deer hunters who are NFQs or FQUs from outside Units 1-5 that harvested 3 or 4 deer (black) and percent of deer harvest represented by these hunters (gray) in Unit 2, Southeast Alaska, from RY1997 to RY2024. NFQs and FQUs from outside Units 1-5 have been restricted to a 2-buck bag limit when hunting on federal lands in Unit 2 since 2018.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it unnecessarily limits opportunity; the department is **NEUTRAL** on the allocative portions of the proposal. If adopted, the board should consider whether regulations continue to provide a reasonable opportunity for subsistence uses of deer.

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

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PROPOSAL 40 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Reduce the non-resident bag limit for deer in Unit 2 from 4 bucks to 1 buck.

PROPOSED BY: Klawock Fish and Game Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This proposal would decrease the nonresident bag limit for deer in Unit 2 from 4 bucks to 1 buck.

WHAT ARE THE CURRENT REGULATIONS?

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 2 4 bucks	Aug. 1 – Dec. 31	Aug 1 – Dec. 31

There is a positive intensive management finding for deer in Unit 2 with population and harvest objectives of 71,000 and 2,700, respectively.

There is a positive customary and traditional use determination for deer in Unit 2 and an amount reasonably necessary for subsistence (ANS) of 1,500-1,600 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would decrease the nonresident bag limit for Sitka black-tail deer in Unit 2 from 4 bucks to 1 buck. If adopted, this proposal is expected to have a negligible impact on Unit 2 deer harvest and would restrict opportunity for nonresident hunters to harvest two or more bucks.

BACKGROUND: Conversations with Unit 2 hunters suggest that harvest opportunity for and access to deer have become more difficult due to a smaller deer population and access issues. Logging and forest stand succession have negatively impacted deer habitat and hunter access in much of Unit 2. This proposal specifically states that Unit 2 residents "are concerned about the steady and significant decline in deer numbers and availability for subsistence food resources." Unit 2 deer harvest declined from regulatory year (RY) 2016 to RY2023 but increased slightly in RY2024 (Fig. 1). There were fewer hunters and fewer deer taken per hunter from RY2016–RY2024, which is reflected in the lower Unit 2 deer harvest numbers.

Deer harvest in Unit 2 has been below the objective in all years except RY2001 and from RY2005 through RY2016 (Fig. 1). Deer harvest in Unit 2 has remained within or above the ANS range since RY1997, except in RY2023 (Fig. 2). The bag limit for deer in Unit 2 was 4 deer prior to RY1972 and was lowered to 3 deer from RY1972 to RY1977. A restriction for harvesting only antlered deer was put in place from RY1978 to RY1986, but it was removed after only one year, RY1987. The bag limit has remained unchanged at 4 bucks from RY1988 to present.

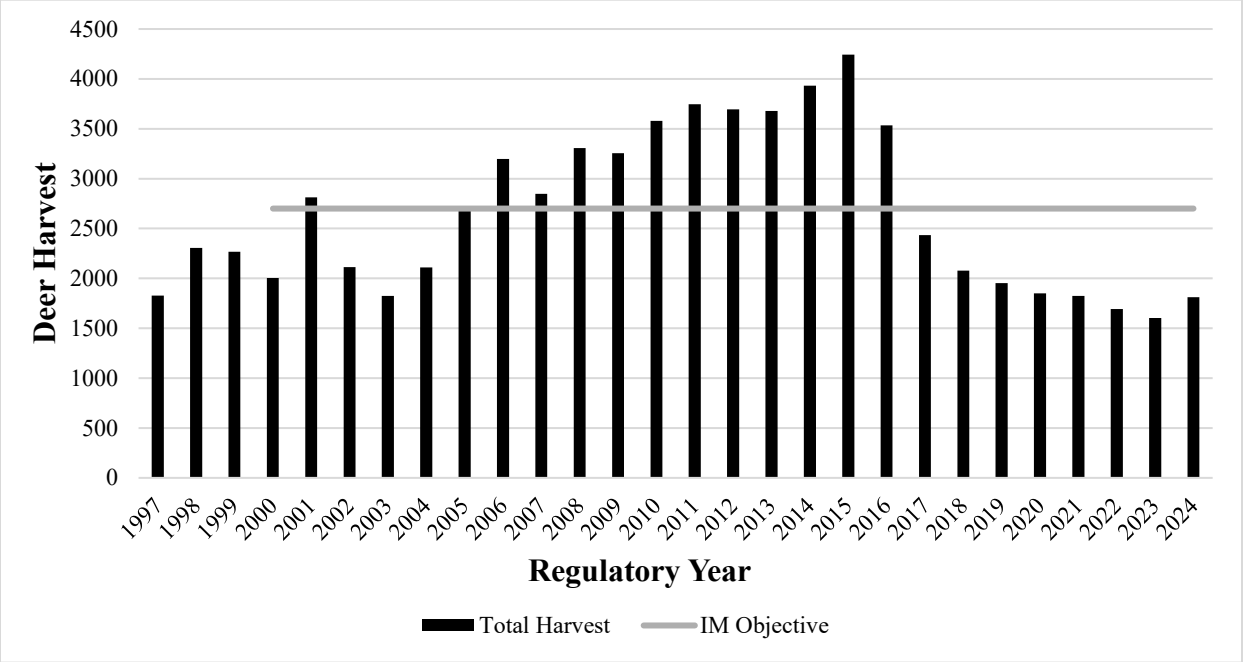


Figure 1. Harvest of deer in comparison to the intensive management harvest objective of 2,700 deer in Unit 2, RY1997 to RY2024.

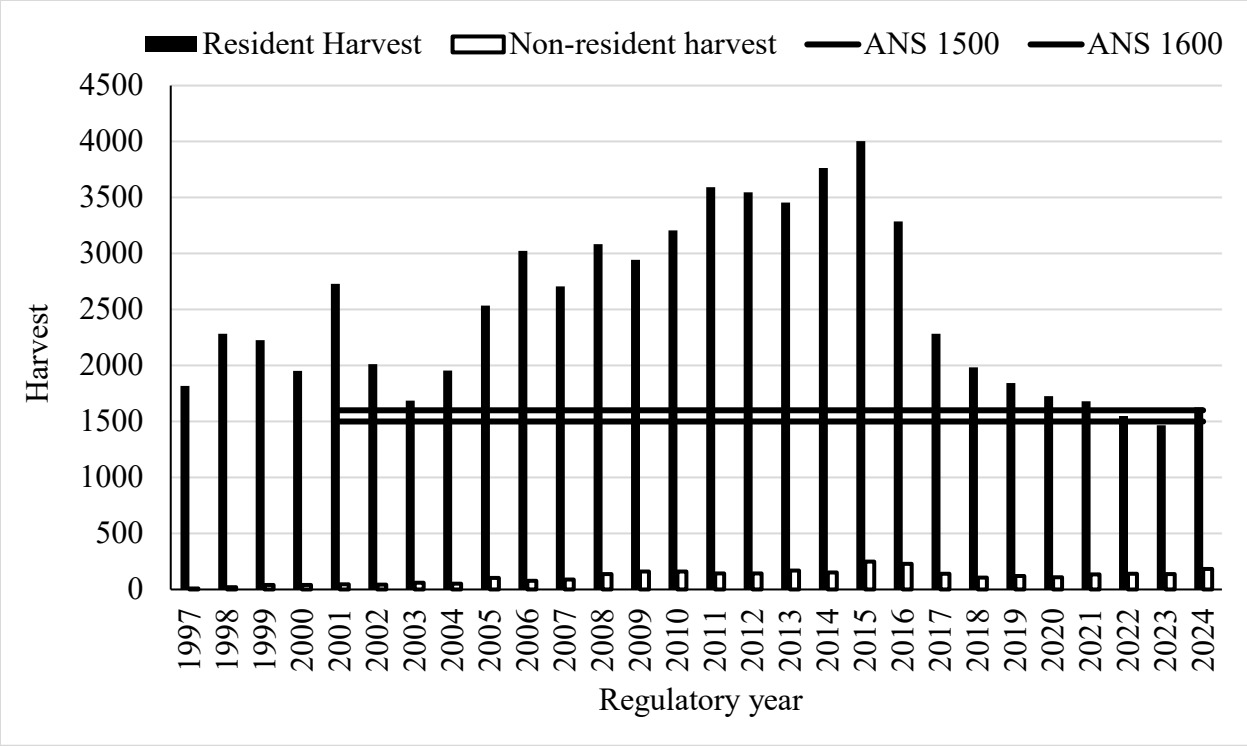


Figure 2. Resident and nonresident deer harvest from RY1997–RY2024 in Unit 2, Southeast Alaska.

The commercial logging legacy on Unit 2 lands has altered deer habitat and hunter access. Roads built to support logging in Unit 2 have resulted in the highest density of roads in Southeast Alaska, with approximately 2,500 miles (4,000 km) of drivable roads. This has increased hunter access. Logging activity has also reduced winter deer habitat in north central Prince of Wales Island (POW) by 46% and in south POW by 18%. Old-growth forests provide important deer wintering habitat. Deer seek refuge from deep snow by occupying uneven-aged old-growth forests, which intercept falling snow in the canopy and retain important ground-level forage. Uniform-aged second-growth forests do not intercept snow as well, reducing the accessibility of ground-level forage to deer. Removing important deer wintering habitat has a negative long-term impact on deer populations and has likely contributed to the decline of the Unit 2 deer population. Clearcut logging can result in abundant ground-level forage for deer and other species in the years immediately following the clearcut. However, the initial flush of vegetation is succeeded by a "stem exclusion" stage when a dense tree canopy limits light and other resources and results in the death of weaker trees and a lack of new seedling establishment. This stage of forest growth is largely unproductive for many species including deer and can last for 150 years or longer. As of 2018, approximately 360,000 acres of old-growth has been harvested on Prince of Wales; 169,000 of those 360,000 acres are currently in stem-exclusion stage and another 115,000 acres are close to this stage. Studies on Prince of Wales Island demonstrated that deer densities in managed lands logged for more than 30 years support 7 deer/km^2 compared

to unmanaged (old-growth) lands which support 12 deer/km^2. Clearcuts also impact hunter access to hunting areas. Once clearcuts have grown enough to obstruct visibility, hunters tend to avoid these areas as they become difficult to travel through and support fewer deer. The succession of clearcut forests may be contributing to the increased effort required for Unit 2 hunters to harvest deer in recent years.

Deer populations in Unit 2 have historically been measured using various methods including aerial alpine surveys (Fig. 3), pellet counts (Table 1), and hunter harvest and effort data from harvest reports (Fig. 4). Aerial surveys were conducted on northern POW from 2016-2019 and central POW from 2017-2019. Results from aerial surveys show an increase in deer abundance in central POW, and a slight decrease in deer abundance in northern POW during the survey periods (Fig. 3). However, the department discontinued aerial alpine survey efforts due to the lack of clear evidence of how these surveys relate to overall deer abundance. Figure 1 describes pellet transect plots with long-term data trends. The department conducted pellet transects in Unit 2 from 1981 to 2019. However, due to the insensitive outputs of pellet transect data, the department discontinued pellet surveys in Southeast Alaska after RY2020.

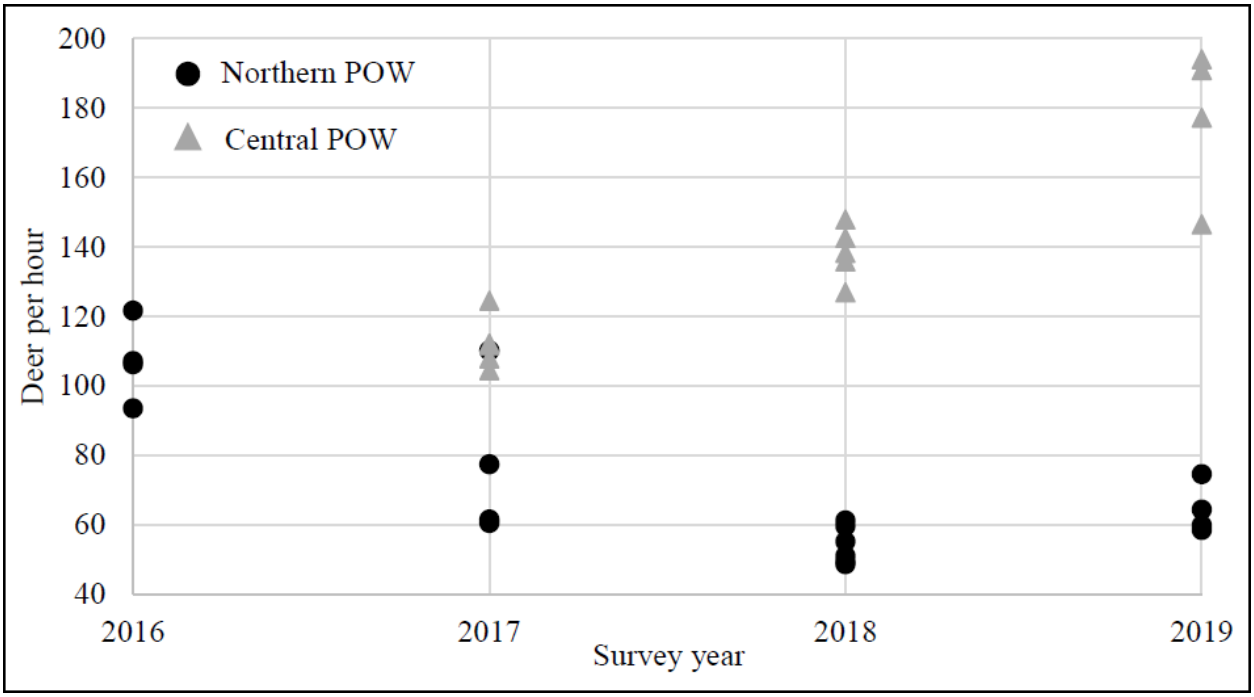


Figure 3. Number of deer observed per hour of flight during aerial alpine surveys on northern and central Prince of Wales (POW) Island, Southeast Alaska, from 2016 to 2019. Central POW was not surveyed in 2016, and aerial surveys were not conducted in Unit 2 prior to 2016.

Since 2020, the department has used hunter harvest and effort data from harvest reports as an index of abundance of the deer population. The average number of days it took a hunter to harvest a deer (days per deer) is used by the department as a measure of trend in deer abundance.

From RY2004 to RY2016, hunter days per deer averaged 3.4, and increased to an average of 4.9 days per deer between RY2017 to RY2024 (Fig. 4). In addition, based on the raw harvest data, there were fewer hunters, and fewer deer harvested per hunter, which also contributed to the decline in harvest. The increased amount of effort required to harvest a deer from RY2017 to RY2024 is similar to that which was reported between RY1997 to RY2003. However, from RY2004 to RY2016, the deer harvest rebounded without management intervention, and supported record harvests from RY2010 to RY2016.

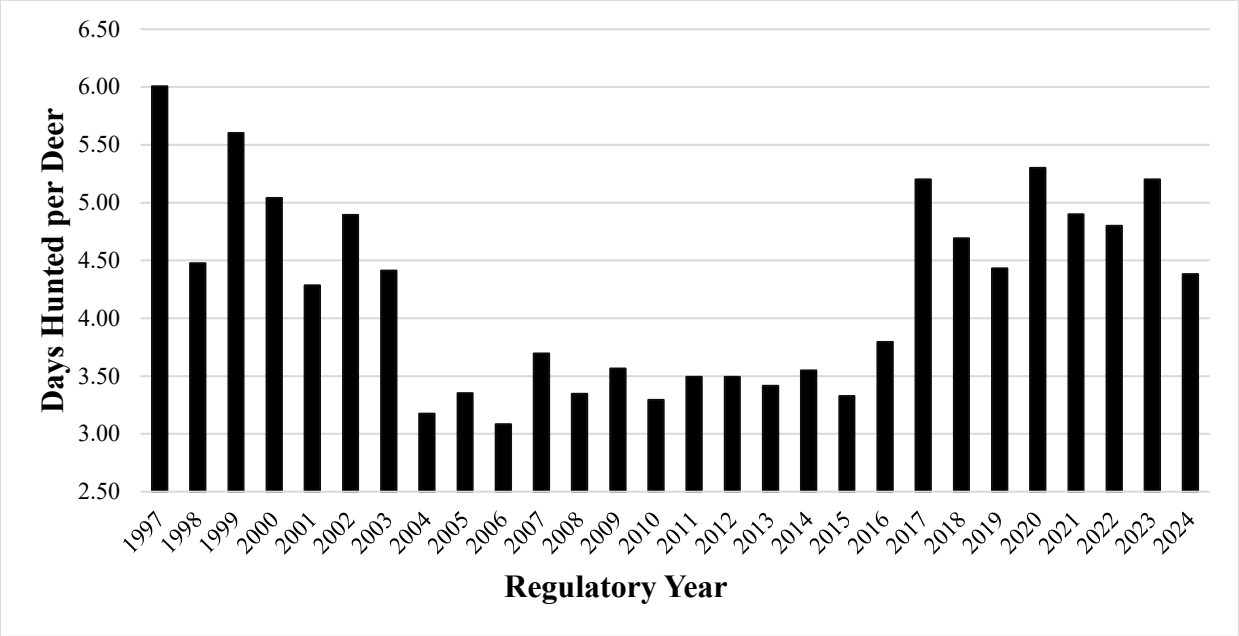
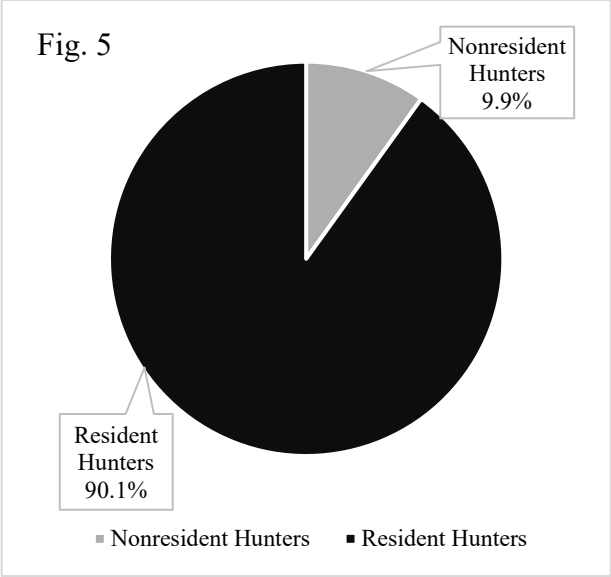
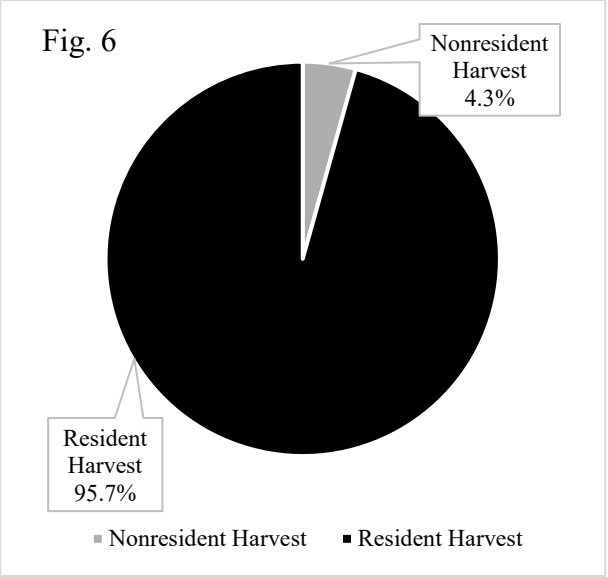


Figure 4. Average days hunted per deer harvested for Unit 2, Southeast Alaska, from RY1997 to RY2024.

The adoption of this proposal would have limited impact on the harvest of deer in Unit 2. Nonresident hunters make up a small proportion of hunters from RY1997 to RY2024 (9.9%, Fig. 5), and nonresident harvest is an even smaller proportion of overall harvest (4.3%, Fig. 6). Nonresident hunters are considered non-federally qualified users (NFQs), and NFQs who hunt in Unit 2 on federal land, which makes up 80% of the land area of Unit 2, have been restricted to a two-buck bag limit since 2018. The percentage of Unit 2 deer hunters who are nonresidents that harvest two or more deer has averaged 0.8% from RY1997 to RY2024 and has averaged 0.9% since the 2018 bag limit restrictions to NFQs were implemented (Fig. 7), totaling about 16 hunters per year since RY2018. Considering the small proportion of nonresident hunters that harvest two or more deer, this proposal would prevent roughly 18 bucks from being harvested annually if nonresident Unit 2 deer hunters were restricted to one buck instead of four bucks. This could unnecessarily limit harvest opportunity for those few nonresident hunters that seek to harvest two or more deer in Unit 2.





Figures 5 & 6. The average percentage of resident and nonresident deer hunters (Fig. 5) and deer harvest (Fig. 6) in Unit 2, Southeast Alaska, from RY1997 to RY2024.

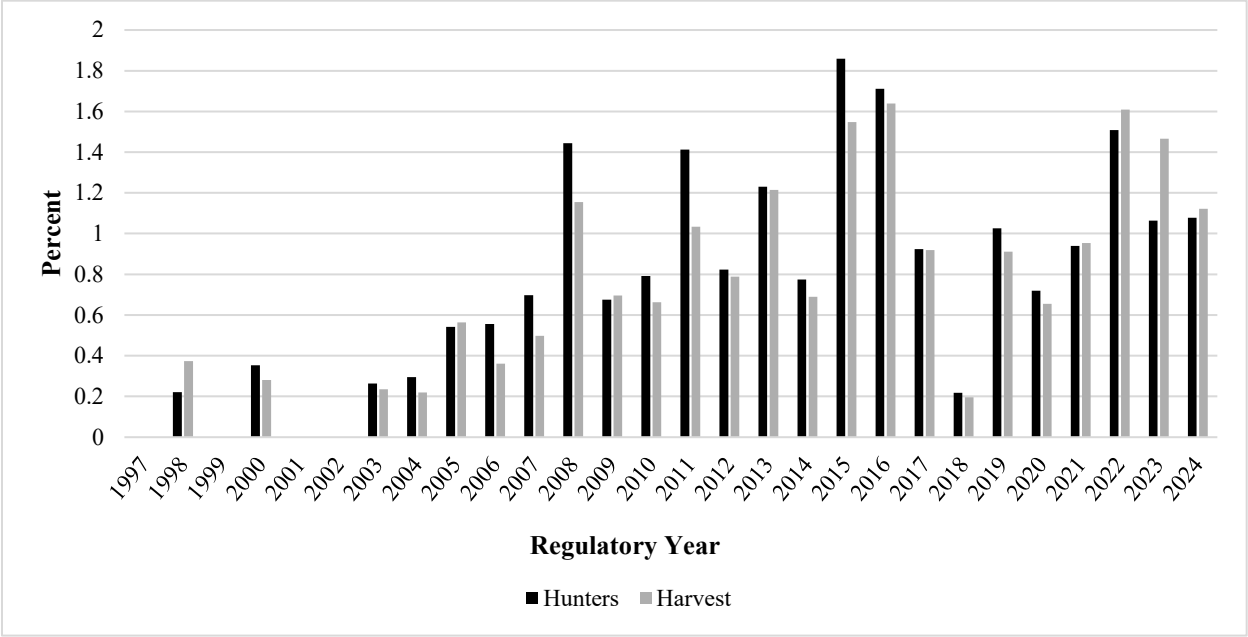


Figure 7. Percent of all Unit 2 deer hunters who are nonresidents that harvested two or more deer (black), and percent of deer harvest represented by these hunters (gray) in Unit 2, Southeast Alaska, from RY1997 to RY2024. Nonresident hunters are considered NFQs and have been restricted to a 2-buck bag limit when hunting on federal lands in Unit 2 since 2018.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it unnecessarily limits opportunity; the department is **NEUTRAL** on the allocative portions of the proposal. If adopted, the board should consider whether regulations continue to provide a reasonable opportunity for subsistence uses of deer.

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

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PROPOSAL 41 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Reduce the non-resident bag limit for deer in Unit 2 from 4 bucks to 1 buck.

PROPOSED BY: Craig Fish and Game Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This proposal would decrease the nonresident bag limit for deer in Unit 2 from 4 bucks to 1 buck.

WHAT ARE THE CURRENT REGULATIONS?

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 2 4 bucks	Aug. 1 – Dec. 31	Aug 1 – Dec. 31

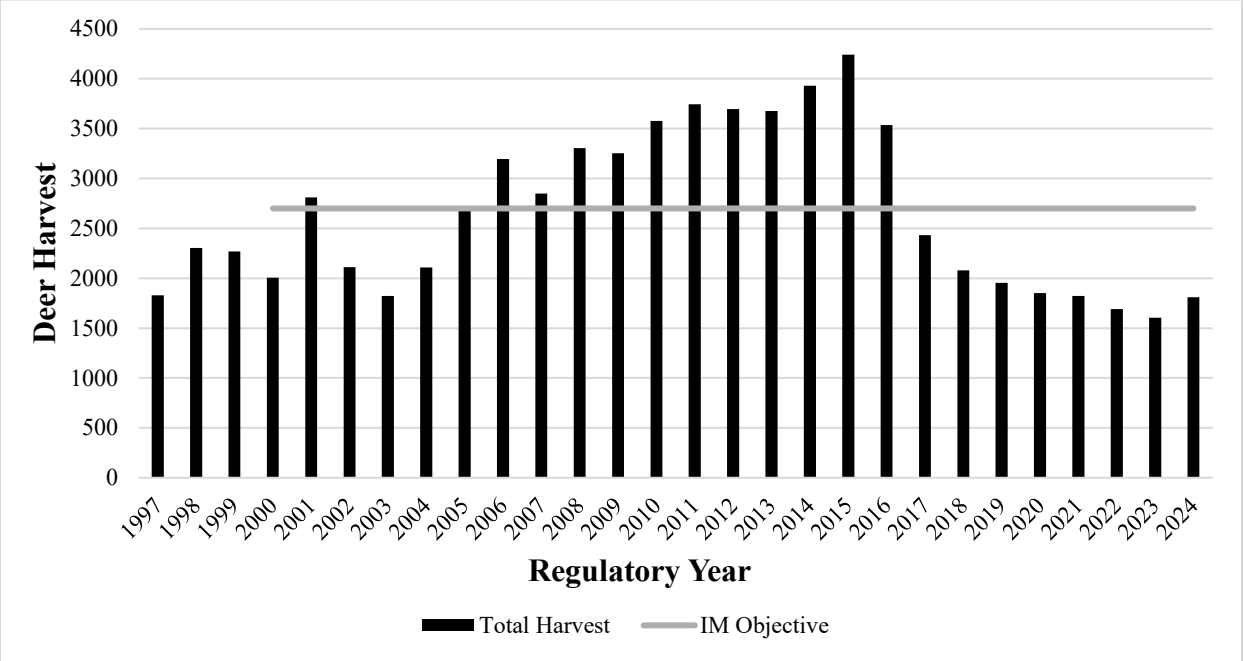
There is a positive intensive management finding for deer in Unit 2 with population and harvest objectives of 71,000 and 2,700, respectively.

There is a positive customary and traditional use finding for deer in Unit 2 and an amount reasonably necessary for subsistence of 1,500-1,600 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would decrease the nonresident bag limit for Sitka black-tail deer in Unit 2 from 4 bucks to 1 buck.

BACKGROUND: Conversations with Unit 2 hunters suggest that harvest opportunity for and access to deer have become more difficult due to a smaller deer population and access issues. Logging and forest stand succession have negatively impacted deer habitat and hunter access in much of Unit 2. This proposal specifically states that Unit 2 residents "are concerned about the steady and significant decline in deer numbers and availability for subsistence food resources." Unit 2 deer harvest declined from regulatory year (RY) 2016 to RY2023 but increased slightly in RY2024 (Fig. 1). There were fewer hunters and fewer deer taken per hunter from RY2016–RY2024, which is reflected in the lower Unit 2 deer harvest numbers.

Deer harvest in Unit 2 has been below the objective in all years except RY2001 and from RY2005 through RY2016 (Fig. 1). Deer harvest in Unit 2 has remained within or above the ANS range since RY1997, except in RY2023 (Fig. 2). The bag limit for deer in Unit 2 was 4 deer prior to RY1972 and was lowered to 3 deer from RY1972 to RY1977. A restriction for harvesting only antlered deer was put in place from RY1978 to RY1986, but it was removed after only one year, RY1987. The bag limit has remained unchanged at 4 bucks from RY1988 to present.



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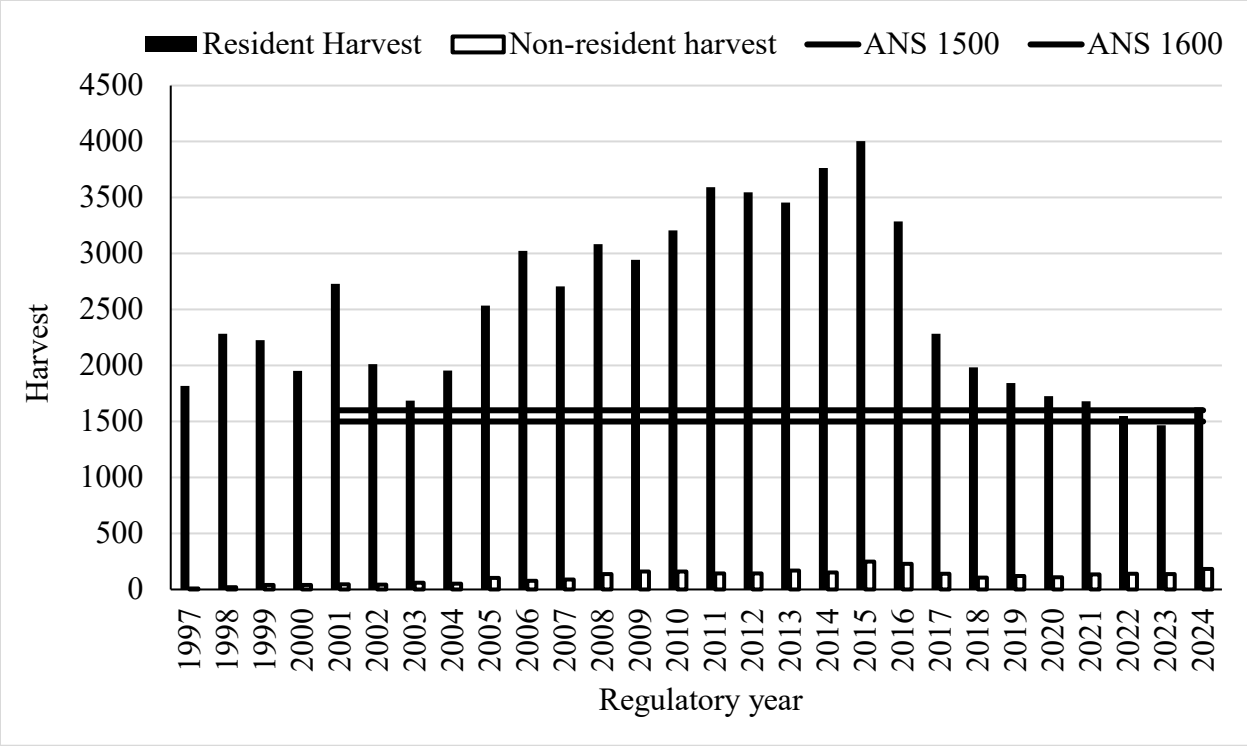

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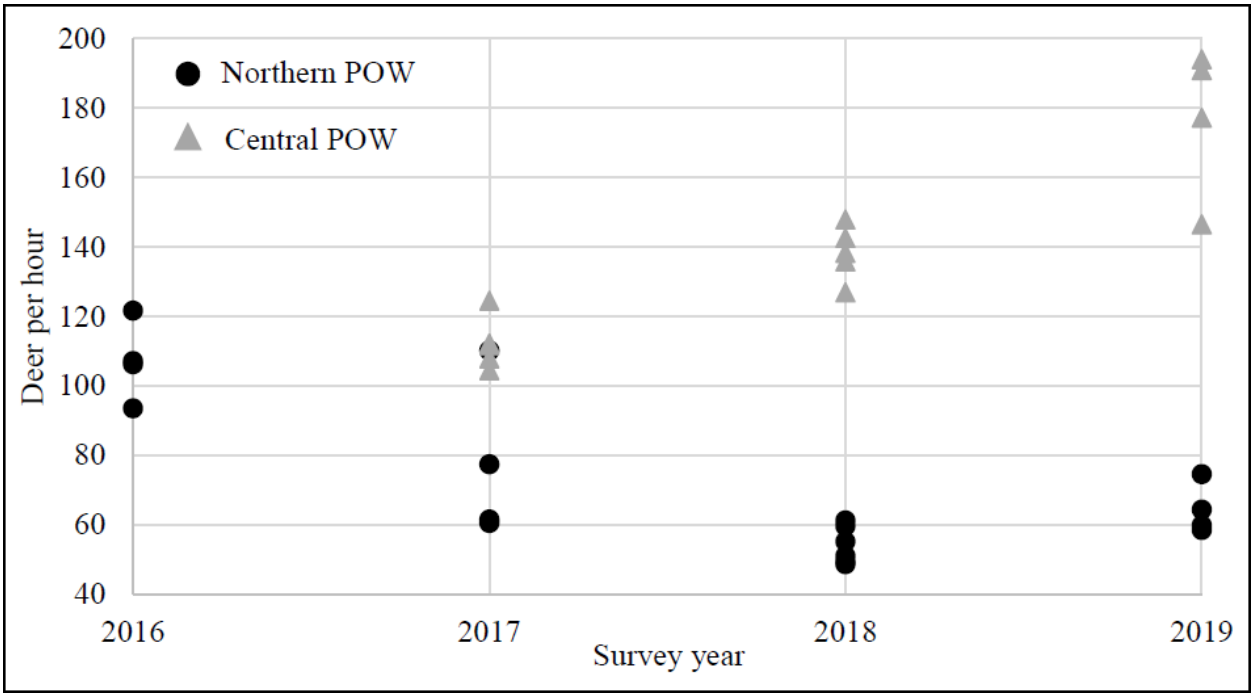

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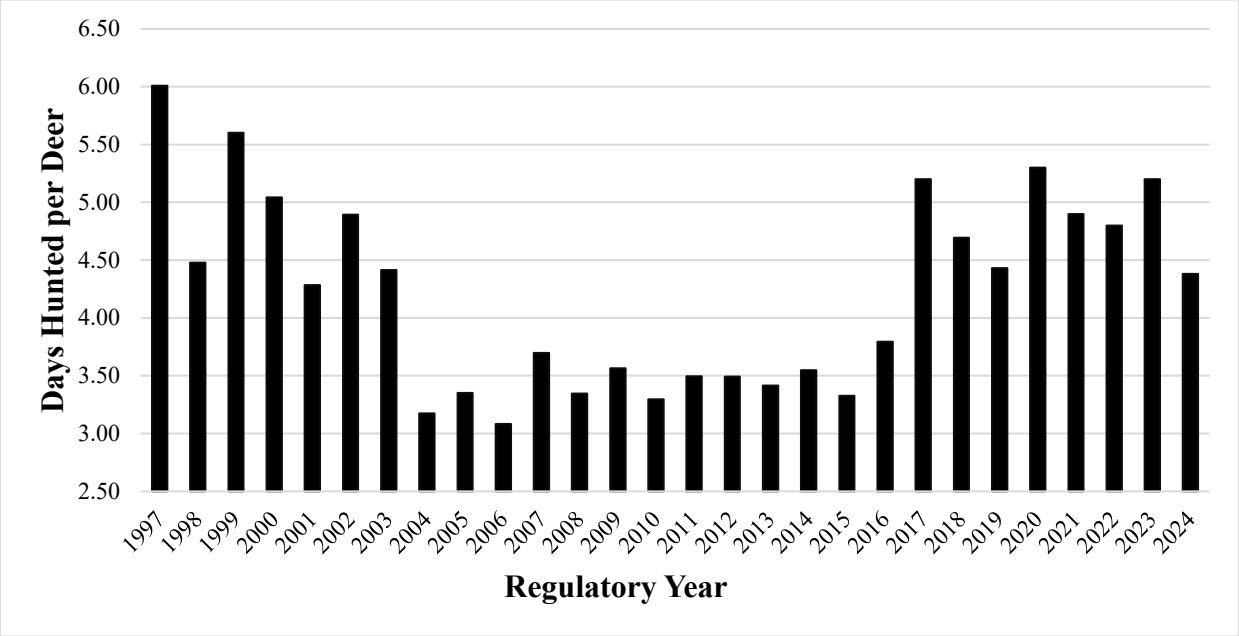
4). In addition, based on the raw harvest data, there were fewer hunters, and fewer deer harvested per hunter, which also contributed to the decline in harvest. The increased amount of effort required to harvest a deer from RY2017 to RY2024 is similar to that which was reported between RY1997 to RY2003. However, the deer harvest rebounded from RY2004 to RY2016 without management intervention, and experienced sustained record harvests from RY2010 to RY2016.



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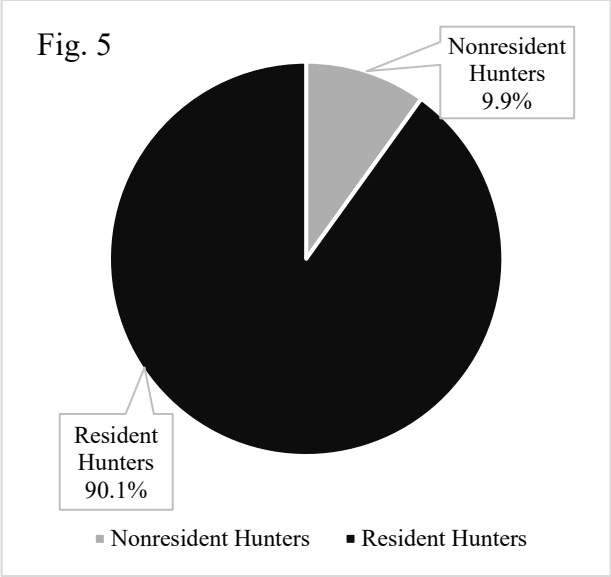
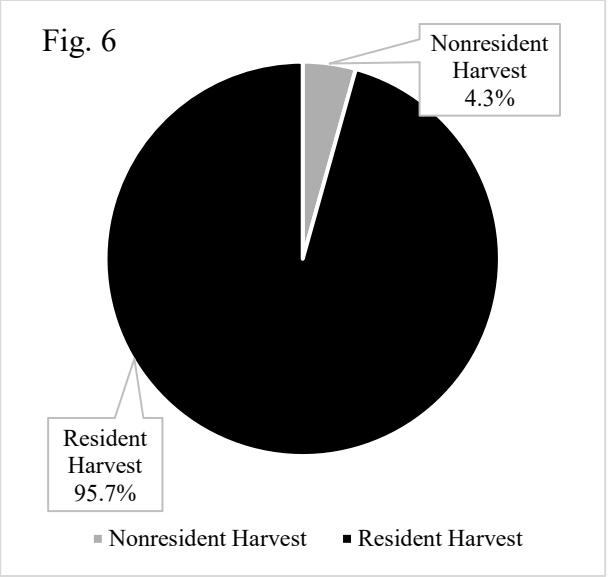
The adoption of this proposal would have limited impact on the harvest of deer in Unit 2. Nonresident hunters make up a small proportion of hunters from RY1997 to RY2024 (9.9%, Fig. 5), and nonresident harvest is an even smaller proportion of overall harvest (4.3%, Fig. 6). Nonresident hunters are considered non-federally qualified users (NFQs), and NFQs who hunt in Unit 2 on federal land, which makes up 80% of the land area of Unit 2, have been restricted to a two-buck bag limit since 2018. The percentage of Unit 2 deer hunters who are nonresidents that harvest two or more deer has averaged 0.8% from RY1997 to RY2024 and has averaged 0.9% since the 2018 bag limit restrictions to NFQs were implemented (Fig. 7), totaling about 16 hunters per year since RY2018. Considering the small proportion of nonresident hunters that harvest two or more deer, this proposal would prevent roughly 18 bucks from being harvested annually if nonresident Unit 2 deer hunters were restricted to one buck instead of four bucks. This could unnecessarily limit harvest opportunity for those few nonresident hunters that seek to harvest two or more deer in Unit 2.





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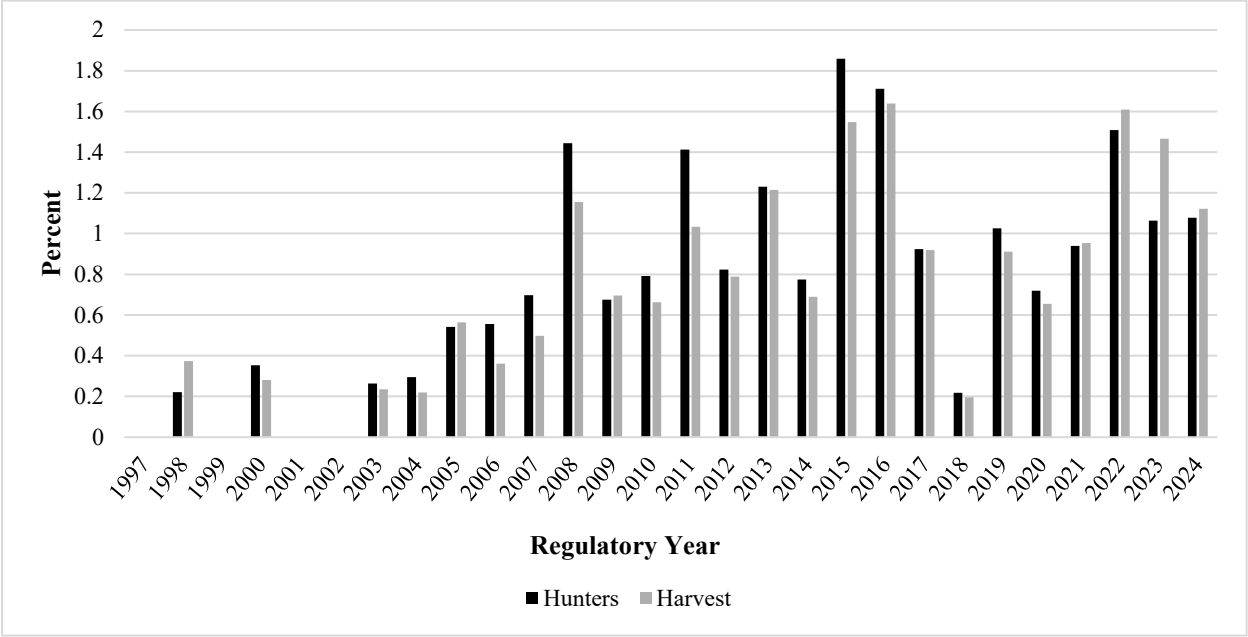

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DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it unnecessarily limits opportunity; the department is **NEUTRAL** on the allocative portions of the proposal. If adopted, the board should consider whether regulations continue to provide a reasonable opportunity for subsistence uses of deer.

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

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PROPOSAL 42 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Modify the start date for deer in Unit 2 from August 1st to August 15th for nonresidents.

PROPOSED BY: Craig Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would modify the nonresident start date for the deer season in Unit 2 from August 1st to August 15th.

WHAT ARE THE CURRENT REGULATIONS?

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
		Aug. 1 – Dec. 31
Unit 2 4 bucks	Aug 1 – Dec. 31	

There is a positive intensive management finding for deer in Unit 2 with population and harvest objectives of 71,000 and 2,700, respectively.

There is a positive customary and traditional use finding for deer in Unit 2, with an amount reasonably necessary for subsistence of 1,500-1,600 deer.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would modify the nonresident season opening date for Sitka black-tail deer in Unit 2 from August 1st to August 15th. If adopted, there would be slightly less deer harvest opportunity for nonresidents during the early season.

BACKGROUND: Conversations with Unit 2 hunters suggest that harvest opportunity for and access to deer have become more difficult due to a smaller deer population and access issues. Logging and forest stand succession have negatively impacted deer habitat and hunter access in much of Unit 2. This proposal specifically states that Unit 2 residents "are concerned about the steady and significant decline in deer numbers and availability for subsistence food resources." Unit 2 deer harvest declined from regulatory year (RY) 2016 to RY2023 but increased slightly in RY2024 (Fig. 1). There were fewer hunters and fewer deer taken per hunter from RY2016–RY2024, which is reflected in the lower Unit 2 deer harvest numbers.

Deer harvest in Unit 2 has been below the objective in all years except RY2001 and from RY2005 through RY2016 (Fig. 1). Deer harvest in Unit 2 has remained within or above the ANS

range since RY1997, except in RY2023 (Fig. 2). The bag limit for deer in Unit 2 was 4 deer prior to RY1972 and was lowered to 3 deer from RY1972 to RY1977. A restriction for harvesting only antlered deer was put in place from RY1978 to RY1986, but it was removed after only one year, RY1987. The bag limit has remained unchanged at 4 bucks from RY1988 to present.

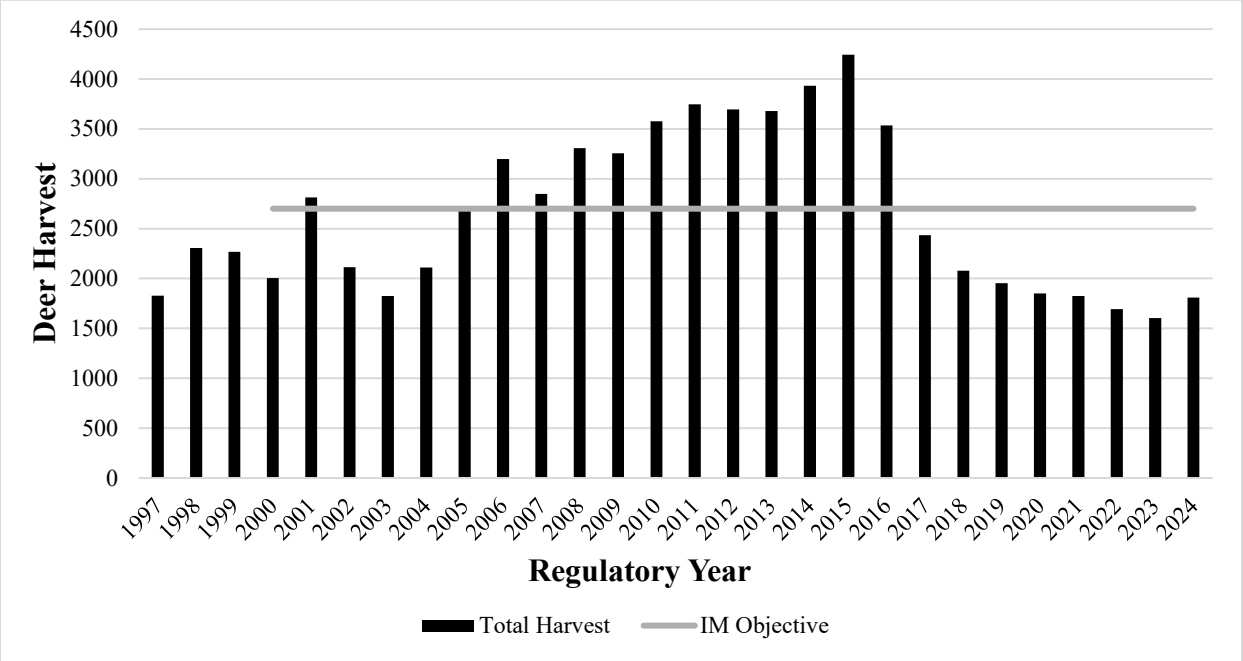


Figure 1. Harvest of deer in comparison to the intensive management harvest objective of 2,700 deer in Unit 2, RY1997 to RY2024.

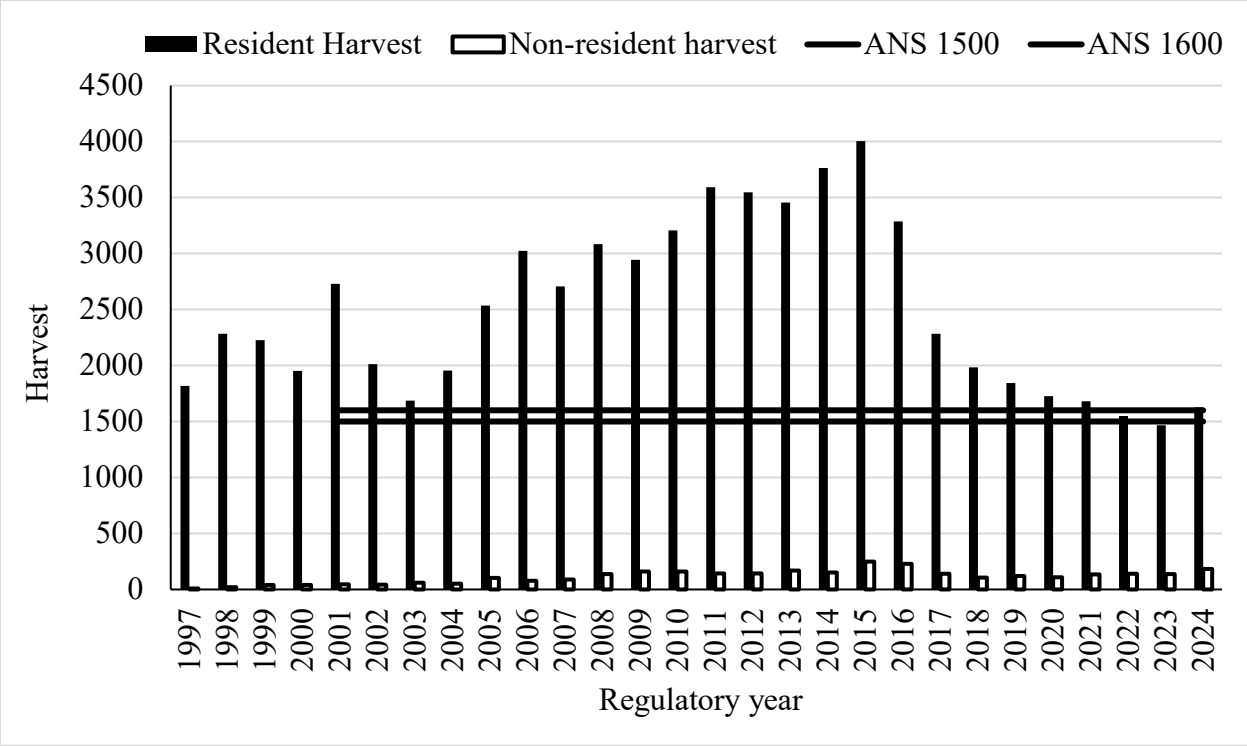


Figure 2. Resident and nonresident deer harvest from RY1997–RY2024 in Unit 2, Southeast Alaska.

The commercial logging legacy on Unit 2 lands has altered deer habitat and hunter access. Roads built to support logging in Unit 2 have resulted in the highest density of roads in Southeast Alaska, with approximately 2,500 miles (4,000 km) of drivable roads. This has increased hunter access. Logging activity has also reduced winter deer habitat in north central Prince of Wales Island (POW) by 46% and in south POW by 18%. Old-growth forests provide important deer wintering habitat. Deer seek refuge from deep snow by occupying uneven-aged old-growth forests, which intercept falling snow in the canopy and retain important ground-level forage. Uniform-aged second-growth forests do not intercept snow as well, reducing the accessibility of ground-level forage to deer. Removing important deer wintering habitat has a negative long-term impact on deer populations and has likely contributed to the decline of the Unit 2 deer population. Clearcut logging can result in abundant ground-level forage for deer and other species in the years immediately following the clearcut. However, the initial flush of vegetation is succeeded by a "stem exclusion" stage when a dense tree canopy limits light and other resources and results in the death of weaker trees and a lack of new seedling establishment. This stage of forest growth is largely unproductive for many species including deer and can last for 150 years or longer. As of 2018, approximately 360,000 acres of old-growth has been harvested on Prince of Wales; 169,000 of those 360,000 acres are currently in stem-exclusion stage and another 115,000 acres are close to this stage. Studies on Prince of Wales Island demonstrated that deer densities in managed lands logged for more than 30 years support 7 deer/km^2 compared to

unmanaged (old-growth) lands which support 12 deer/km^2. Clearcuts also impact hunter access to hunting areas. Once clearcuts have grown enough to obstruct visibility, hunters tend to avoid these areas as they become difficult to travel through and support fewer deer. The succession of clearcut forests may be contributing to the increased effort required for Unit 2 hunters to harvest deer in recent years.

Deer populations in Unit 2 have historically been measured using various methods including aerial alpine surveys (Fig. 3), pellet counts (Table 1), and hunter harvest and effort data from harvest reports (Fig. 4). Aerial surveys were conducted on northern POW from 2016-2019 and central POW from 2017-2019. Results from aerial surveys show an increase in deer abundance in central POW, and a slight decrease in deer abundance in northern POW during the survey periods (Fig. 3). However, the department discontinued aerial alpine survey efforts due to the lack of clear evidence of how these surveys relate to overall deer abundance. Figure 1 describes pellet transect plots with long-term data trends. The department conducted pellet transects in Unit 2 from 1981 to 2019. However, due to the insensitive outputs of pellet transect data, the department discontinued pellet surveys in Southeast Alaska after RY2020.

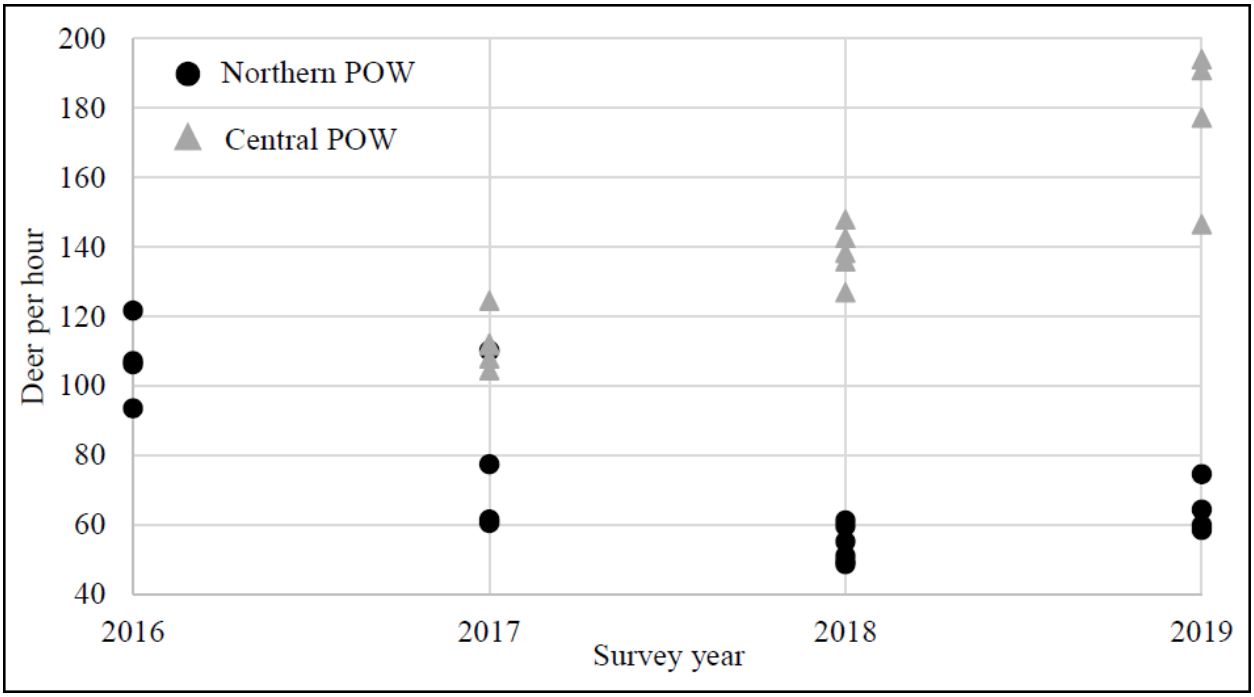


Figure 3. Number of deer observed per hour of flight during aerial alpine surveys on northern and central Prince of Wales (POW) Island, Southeast Alaska, from 2016 to 2019. Central POW was not surveyed in 2016, and aerial surveys were not conducted in Unit 2 prior to 2016.

Since 2020, the department has used hunter harvest and effort data from harvest reports as an index of abundance of the deer population. The average number of days it took a hunter to harvest a deer (days per deer) is used by the department as a measure of trend in deer abundance.

From RY2004 to RY2016, hunter days per deer averaged 3.4, and increased to an average of 4.9 days per deer between RY2017 to RY2024 (Fig. 4). In addition, based on the raw harvest data, there were fewer hunters, and fewer deer harvested per hunter, which also contributed to the decline in harvest. The increased amount of effort required to harvest a deer from RY2017 to RY2024 is similar to that which was reported between RY1997 to RY2003. However, from RY2004 to RY2016, the deer harvest rebounded without management intervention, and supported record harvests from RY2010 to RY2016.

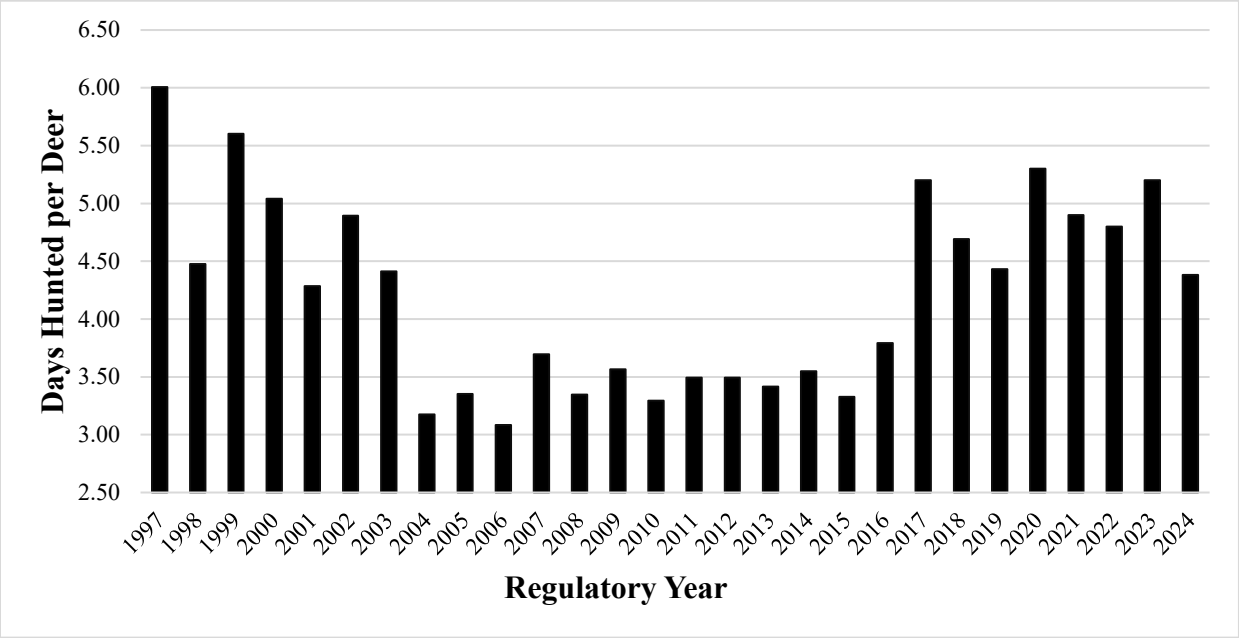


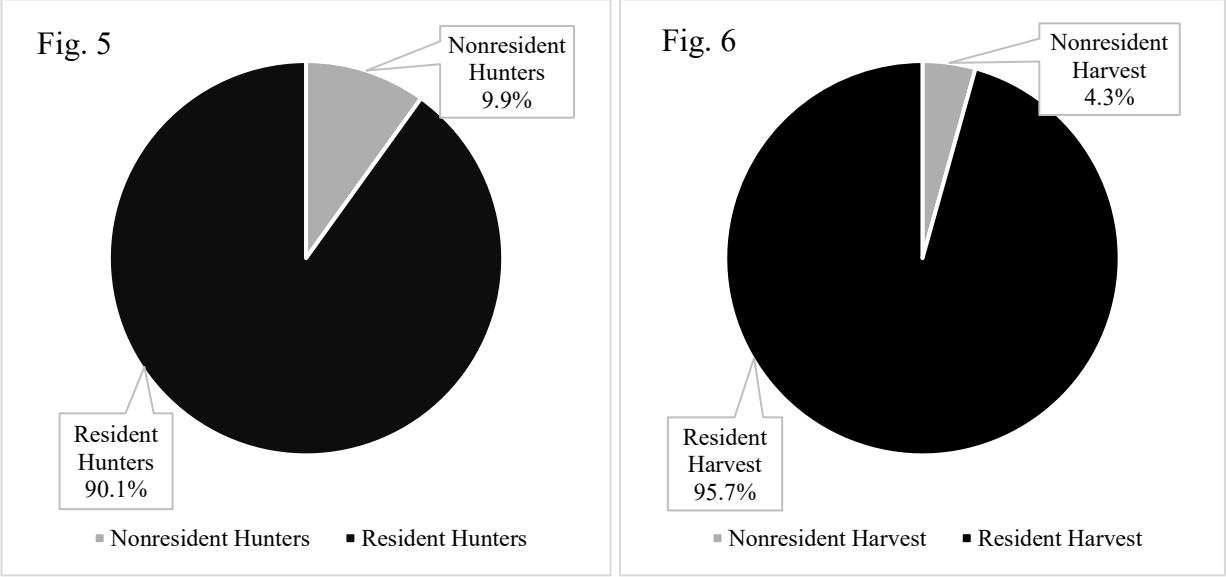
Figure 4. Average days hunted per deer harvested for Unit 2, Southeast Alaska, from RY1997 to RY2024.

The adoption of this proposal would have limited impact on the harvest of deer in Unit 2. Nonresident hunters made up a small proportion of hunters from RY1997 to RY2024 (9.9%, Fig. 5), and nonresident harvest is an even smaller proportion of overall harvest (4.3%, Fig. 6). From RY2015 to RY2024, most deer harvest by nonresidents in Unit 2 occurred in November (56.8%; Fig. 7), but 26.2% of this harvest occurred in August (Fig. 7). During this same time period, Unit 2 deer harvest by nonresident hunters in August made up about 1.8% of total Unit 2 deer harvest.

Assuming that harvest is evenly distributed throughout the month, shifting the start date of the nonresident deer season in Unit 2 from August 1st to August 15th would reduce Unit 2 deer harvest by roughly 0.9%, which corresponds to approximately 20 bucks per year. However, nonresident harvest of Unit 2 deer may not be evenly distributed throughout the month. Non-resident hunters are considered non-federally qualified (NFQ) and are restricted from hunting on federal lands in Unit 2 during August 1st to August 15th, except on the outer islands surrounding Prince of Wales and on that portion of Prince of Wales Island south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait. Therefore, there is likely less nonresident deer harvest in Unit 2 during this time, further

diminishing the impact of this proposal. Nonresident hunters may shift their hunting dates to later in the month to compensate for the federal lands closure.

The adoption of this proposal would not result in a meaningful reduction in harvest of Unit 2 deer and would limit harvest opportunity for the relatively few nonresident hunters that seek to harvest deer on non-federal lands or those federal lands open to NFQ hunters in Unit 2 during the first 2 weeks of August.



Figures 5 & 6. The average percentage of resident and nonresident deer hunters (Fig. 5) and deer harvest (Fig. 6) in Unit 2, Southeast Alaska, from RY1997 to RY2024.

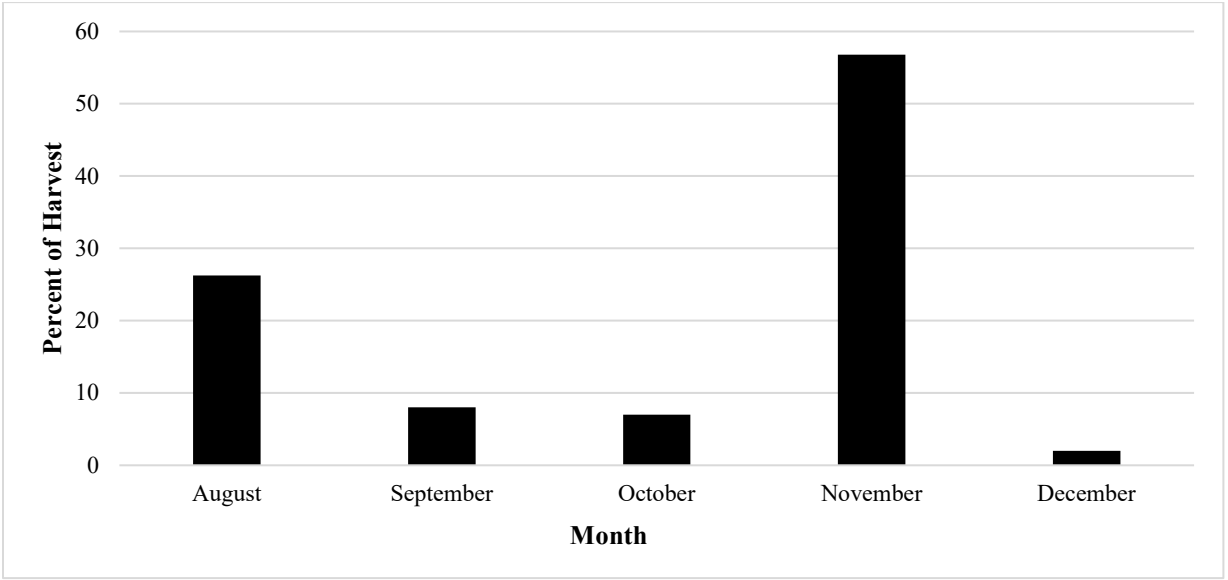


Figure 7. Average deer harvest percentage per month by nonresidents in Unit 2, Southeast Alaska, from RY2015-RY2024.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it unnecessarily limits opportunity; the department is **NEUTRAL** on the allocative portions of the proposal. If adopted, the board should consider whether regulations continue to provide a reasonable opportunity for subsistence uses of deer.

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

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Proposals 43-46

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PROPOSAL 47 – 5 AAC 92.220. Salvage of game meat, furs, and hides. Eliminate the meat salvage requirement in May for black bears in Unit 2 for residents.

PROPOSED BY: Craig Fish and Game Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the black bear meat salvage requirements in Unit 2 during the month of May for Alaska residents.

WHAT ARE THE CURRENT REGULATIONS?

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

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

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

(4) from January 1 through May 31, the edible meat, and from June 1 through December 31, either the hide, or the edible meat as defined in 5 AAC 92.990, of a black bear taken in any game management unit in which sealing is not required; however, from June 1 through December 31, the edible meat of a black bear taken by a resident hunter taking black bear under customary and traditional use activities at a den site from October 15 through April 30, in Unit 19(A), that portion of the Kuskokwim River drainage within Unit 19(D) upstream from the Selatna River drainage and the Black River drainage, and in Units 21(B), 21(C), 21(D), 24, and 25(D) must be salvaged;

Residents can hunt black bears in Unit 2 with a general season harvest ticket and season dates of September 1 – June 30, and a bag limit of 2 bears, not more than 1 of which may be a blue or glacier bear.

Nonresidents hunting with a registered guide or resident relative within second-degree of kindred can hunt black bears in Unit 2 with a general season harvest ticket and season dates of September 1- June 30, and a bag limit of 1 bear.

Nonresidents hunting without a registered guide or resident relative within second-degree of kindred can hunt black bears with a drawing permit and a bag limit of 1 bear. The department uses its discretionary authority to split the drawing permit into fall (September 1 – December 31, DL027) and spring (January 1 – June 30, DL028) seasons and has the ability to issue up to 500 permits total.

There is a positive customary and traditional use finding for black bears in Unit 2 and an amount reasonably necessary for subsistence of 15–20 bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would eliminate the black bear meat salvage requirements in Unit 2 during the month of May for Alaska residents. The edible meat of black bears is required to be salvaged in the spring for bears harvested between January 1 and May 31 in units where sealing is required, which includes Unit 2. The proponent states the intent of this proposal is to encourage more black bear hunters to harvest black bears in Unit 2 to reduce predation on Sitka black-tail deer fawns.

BACKGROUND: The Board of Game (board) implemented meat salvage requirements statewide for spring black bears harvested between January 1st and May 31st starting in regulatory year (RY) 1996. Hunters stated that they regularly salvaged black bear meat during the spring season, and some hunters stated that the palatability of black bear meat degrades after May. The board therefore acted to implement a spring meat salvage requirement that excluded the month of June. At the Southeast board meeting in 1998, Proposal 7 (eliminate mandatory salvage of spring black bear meat in Units 1 – 5) and Proposals 8 and 9 (eliminate mandatory salvage of spring black bear meat in Units 1 – 2) failed, and the board stated "they heard no testimony that this regulation is an unreasonable burden." At the Statewide board meeting in 2006, Proposal 37 to modify the salvage requirements for black bear, requiring either meat or hide to be salvaged, failed.

From RY2015 to RY2024, an average of 180 bears per year have been harvested in Unit 2. Most black bear harvest in Unit 2 occurs during the spring season (January 1st through June 30th), and nonresident black bear harvest is higher than resident harvest. From RY2015 to RY2024, nonresidents harvested an average of 108 bears per year, compared to 71 bears per year by residents during the same period. Resident success rates for black bear average about 42% – the department estimates that there were roughly 1,588 resident black bear hunters in Unit 2 from RY2015 to RY2024, 663 of which successfully harvested a bear. Of the 713 black bears harvested by residents from RY2015 to RY2024, 74.3% were harvested during the spring season (Fig. 1) and 51.6% of those were harvested in May (Fig. 2).

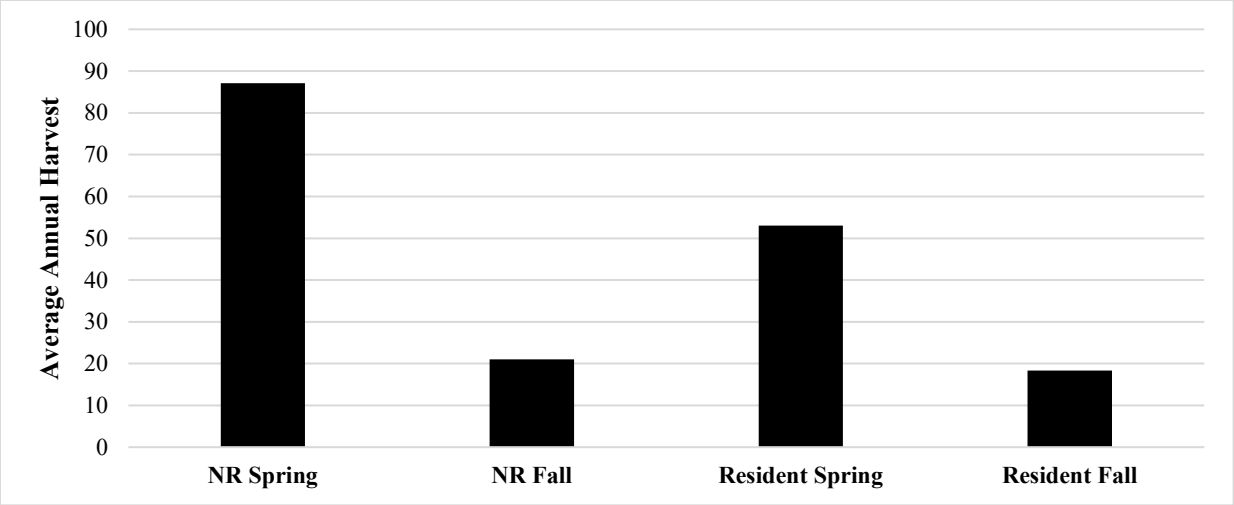

Figure 1. Average annual black bear harvest by nonresidents (NR) and residents in Unit 2, Southeast Alaska, from RY2015 to RY2024.

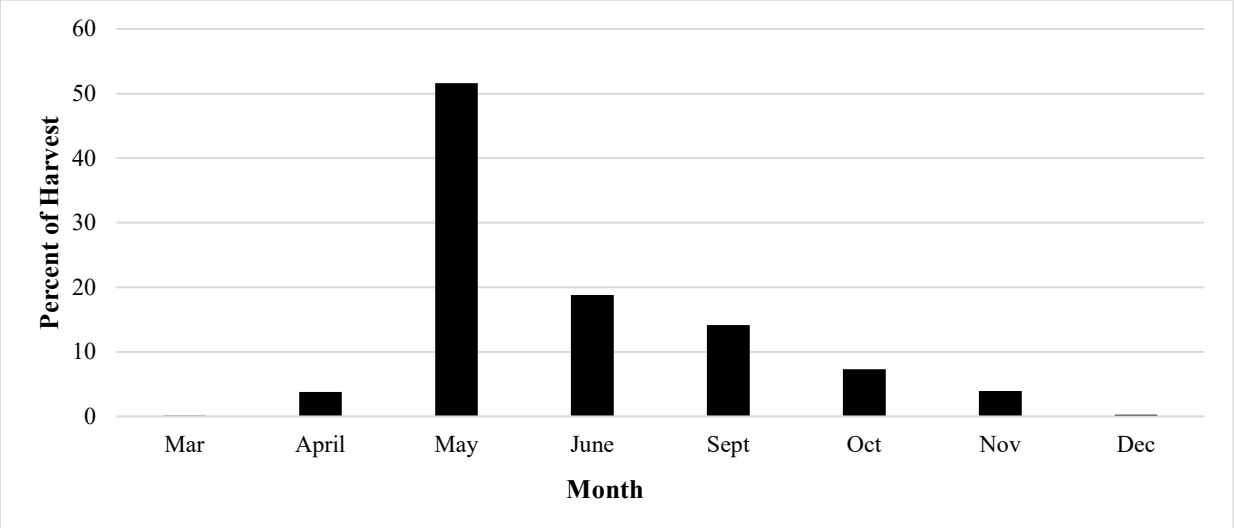

Figure 2. Percent of resident black bear harvest by month in Unit 2, Southeast Alaska, from RY2015 to RY2024.

Although the bag limit for black bears in Unit 2 is 2 bears, over the past ten regulatory years, the majority of resident hunters (613 of the 663 resident Unit 2 black bear hunters; 97%) harvested only a single bear. This indicates that a relatively low proportion of Unit 2 black bear hunters take advantage of existing opportunities to harvest more than one black bear, likely diminishing the impact of this proposal. Although the resident bag limit for black bears in Unit 2 is 2 bears, relatively few hunters harvest more than one bear. From RY2015 to RY2024, an average of only 5 hunters per year harvested 2 bears in Unit 2: about 4 of those hunters harvested 2 bears in the spring, and the remainder harvested either 2 bears in the fall or a bear in each season. Of these hunters that harvested two bears in Unit 2, an average of 6 bears were harvested during months requiring meat salvage, and an average of 4 bears were harvested outside of months requiring

meat salvage from RY2015 to RY2024. Considering most bears are harvested in months currently requiring meat salvage it appears that hunters find black bear meat to be an important food resource. Furthermore, a positive customary and traditional use finding for black bears in Unit 2 suggests the importance of black bear meat as a food resource.

Conversations with about a dozen Unit 2 black bear hunters suggest this proposal would have limited impact on bear harvest. When asked whether this proposal would result in their harvesting additional bears, most hunters responded that they would not harvest any additional black bears if the meat salvage requirement in May were eliminated. Many hunters explained that they hunt black bears specifically for the value of the meat as a food resource, that they do not harvest any animal they do not intend to eat, and expressed discontent about wasted food resources. Relatively few hunters stated that the adoption of this proposal would result in an increase in harvest or a shift in harvest dates, and expressed sentiments related to reducing black bear predation on deer. It is unknown to what degree predation influences the deer population, and there is no documentation that increasing black bear harvest will reduce predation.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because adoption of it would not create a biological concern. It is unknown to what degree black bear predation on deer fawns influences the deer population and opportunities for deer harvest. There is no indication that eliminating the requirement for meat salvage of black bears in Unit 2 in May for Alaska residents will increase the harvest of black bears or reduce predation on deer fawns. This proposal would introduce undue regulatory complexity for black bear hunters, making Unit 2 the only unit in the state in which the salvage of black bear meat would not be required for Alaska residents during the month of May. In addition, there is currently no other hunt in Alaska where the salvage requirements differ based on residency.

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

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Proposals 48-54

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PROPOSAL 55 – 5 AAC 92.080. Unlawful methods of taking game; exceptions. Prohibit the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Unit 2.

PROPOSED BY: Ellen Hannen

WHAT WOULD THE PROPOSAL DO? This proposal would prohibit the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Unit 2.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.080. Unlawful methods of taking game; exceptions. The following methods of taking game are prohibited:

(7) with the aid of

…

(E) electronically enhanced night vision, except that electronically enhanced night vision may be used for taking furbearers;

(F) any forward looking infrared device, except that a forward looking infrared device may be used for taking furbearers;

There is a positive customary and traditional use finding for furbearers in Unit 2 and an amount reasonably necessary for subsistence of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would prohibit the use of enhanced night vision and forward-looking infrared devices (FLIR) for taking furbearers in Unit 2.

BACKGROUND: At the 2016 Statewide Board of Game (board) meeting, the board adopted a proposal submitted by the Alaska Wildlife Troopers that prohibited the use of FLIR for taking game throughout the state. Prior to the board adopting the proposal in 2016, only night vision scopes were prohibited. At the 2024 board meeting in Fairbanks, the board adopted Proposal 52 which allowed the use of enhanced night vision and FLIR for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C). The next year, the board adopted Proposal 126 which allowed the take of furbearers with enhanced night vision and FLIR statewide.

A FLIR detects infrared radiation emitted from a heat source by using thermal or infrared technology to create a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. FLIR technology is available in handheld cameras and cameras that can be attached to smartphones, goggles, and rifle scopes. Night vision devices and FLIR devices provide aid to trappers by allowing identification of and locating of animals from far away through barriers such as snow and darkness.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it introduces regulatory complexity in the form of inconsistent regulations, and the department is supportive of the use of this technology for trapping. If adopted, this proposal would create the only unit in the state that does not allow the take of furbearers using night vision or FLIR. While some residents have expressed concerns with poaching occurring in Unit 2, especially in areas

with higher densities of roads, this concern is not specific to the use of FLIRs. There is potential to abuse the use of FLIR or night vision to aid in the taking of big game, and the department relies on the Alaska Wildlife Troopers observations to quantify how often this occurs. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for the subsistence use of furbearers in Unit 2 if the proposal is adopted.

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

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PROPOSAL 56 – 5 AAC 92.080. Unlawful methods of taking game: exceptions. Prohibit the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Unit 2 during any open deer season.

PROPOSED BY: Ellen Hannen

WHAT WOULD THE PROPOSAL DO? This proposal would prohibit the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Unit 2 during any open deer season.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.080. Unlawful methods of taking game; exceptions. The following methods of taking game are prohibited:

(7) with the aid of

…

(E) electronically enhanced night vision, except that electronically enhanced night vision may be used for taking furbearers;

(F) any forward-looking infrared device, except that a forward-looking infrared device may be used for taking furbearers

There is a positive customary and traditional use finding for furbearers in Unit 2 and an amount reasonably necessary for subsistence of 90% of the harvestable portion.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would prohibit the use of enhanced night vision and forward-looking infrared devices (FLIR) for taking furbearers in Unit 2 during any state or federal deer season.

BACKGROUND: At the 2016 Statewide Board of Game (board) meeting, the board adopted a proposal submitted by the Alaska Wildlife Troopers that prohibited the use of FLIR for taking game throughout the state. Prior to the board adopting the proposal in 2016, only night vision scopes were prohibited. At the 2024 board meeting in Fairbanks, the board adopted Proposal 52 which allowed the use of enhanced night vision and FLIR for taking furbearers in Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C). The next year, the board adopted Proposal 126 which allowed the take of furbearers with enhanced night vision and FLIR statewide.

A FLIR detects infrared radiation emitted from a heat source by using thermal or infrared technology to create a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. FLIR technology is available in handheld cameras and cameras that can be attached to smartphones, goggles, and rifle scopes. Night vision devices and FLIR devices provide aid to trappers by allowing identification of and locating of animals from far away through barriers such as snow and darkness.

The deer seasons differ between state and federal regulations, resident and nonresidents, and locations within units. Table 1 depicts times when deer seasons occur across state and federal seasons in Unit 2.

Table 1. State and federal deer seasons in Southeast Alaska Unit 2.

Manager	Unit	Area	Open Season
State	2	Unit 2	Aug. 1 - Dec. 31
Federal	2	Unit 2	Jul. 24 - Jan. 31

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it introduces regulatory complexity in the form of inconsistent regulations, and the department is supportive of the use of this technology for trapping. If adopted, this proposal would create the only unit in the state that does not allow the take of furbearers using night vision or FLIR. While some residents have expressed concerns with poaching occurring in Unit 2, especially in areas with higher densities of roads, this concern is not specific to the use of FLIRs. There is potential to abuse the use of FLIR or night vision to aid in the taking of big game, and the department relies on the Alaska Wildlife Troopers observations to quantify how often this occurs. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for the subsistence use of furbearers in Unit 2 if the proposal is adopted.

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

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PROPOSAL 57– 5 AAC 85.035. Hunting seasons and bag limits for elk. Open an antler restricted registration hunt for bull elk with 3 points on either side, and season dates of the first Saturday in November to the third Sunday in November.

PROPOSED BY: Wrangell Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would create an unlimited antler restricted registration hunt for elk on Zarembo Island, with a bag limit of 1 bull with at least 3 points on one side, and the season dates of the first Saturday in November to the third Sunday in November.

WHAT ARE THE CURRENT REGULATIONS?

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(1)		
Unit 3, that portion bounded by a line beginning at the intersection of Stikine Strait and Clarence Strait, running southeast following the midline of Clarence Strait, down to its intersection with Earnest Sound, then northeast following the midline of Earnest Sound, excluding the Niblack Islands, to its intersection with Zimovia Strait, then northwest following the western shoreline of Zimovia Strait to its intersection with Chichagof Passage, then west along the midline of Chichagof Passage to its intersection with Stikine Strait, then west and south along the midline of Stikine Strait, back to the point of beginning.		

1 bull by drawing permit only, and by bow and arrow only; up to 50 permits will be issued; or	Sept. 1−Sept. 30 (General hunt only)	Sept. 1−Sept. 30
1 bull by drawing permit only; up to 250 permits will be issued; or	Oct. 1−Oct. 31 (General hunt only)	Oct. 1−Oct. 31
1 bull by registration permit only	Nov. 15−Nov. 30 (General hunt only)	Nov. 15−Nov. 30
Unit 3, Zarembo Island 1 bull by drawing permit only; up to 25 permits will be issued	Oct. 1–Oct.31	Oct. 1–Oct. 31
Unit 3, Bushy and Shrubby Islands, and the Kashevarof Islands	No open season	No open season
Units 1, 2, and the remainder of Unit 3	No open season	No open season

There is a negative customary and traditional use (C&T) finding for elk in Unit 3.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would create an antler restricted elk registration hunt for residents and nonresidents on Zarembo Island (Figure 1). Based on aerial survey data, trail camera data, and reports received from the public, the Zarembo elk population is estimated to be fewer than 50 total animals. If this proposal were adopted, the long-term stability of the elk herd could be jeopardized. The department anticipates that harvest success would be higher on Zarembo Island than on Etolin Island because of widespread access via logging roads and higher visibility of elk along shorelines. Trail camera images suggest that most bulls, excluding 1.5-year-old spikes, on Zarembo Island have at least 3 points on each antler.

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

In 1996, the Alaska Board of Game (board) established a bull only drawing hunt in Unit 3. In 2000, the BOG established boundaries for the Unit 3 drawing hunt area. The original drawing hunt area included both Etolin and Zarembo Islands. Between 1997 and 2005, when Zarembo Island was included in the Unit 3 elk hunting area, an average of 3 elk were harvested annually, ranging from one to 6 elk (Figure 2). In 2005, prior to the start of the late-November RE325 elk registration hunt, an emergency order was issued closing the Zarembo Island portion of the hunt

area. Based on a previous population estimate, a harvest quota of 10 bulls was established for Zarembo Island. Six bulls were harvested on Zarembo during the September and October drawing permit hunts and managers determined the 4 bulls remaining in the quota were insufficient to allow for an open registration permit hunt. After 6 bulls were harvested during the 2005 season, Unit 3 managers determined harvest had reached an unsustainable level, and elk hunting on Zarembo Island was closed for the next eighteen years. Given such a small allowable harvest, opening the registration elk hunt in this area would have run the risk of overharvest, which would have been detrimental to the long-term stability of the population.

In the aftermath of the 2005 emergency closure of the elk season on Zarembo Island, and prior to the start of the 2006 season, the department made the decision to keep the elk season on Zarembo Island closed until the population and bull:cow ratio increased. In 2013, following several consecutive years of emergency closures, the board took similar regulatory action, closing Zarembo Island to elk hunting. During the 2023 Southeast Region Board of Game meeting the board adopted a new drawing hunt (DE324) for elk on Zarembo Island. One permit was issued the inaugural season (2024), and one bull was harvested.

Abundance and composition of elk populations cannot be reliably monitored in the dense coastal rainforest of Unit 3, and no data are available to make meaningful elk population composition estimates for Zarembo Island. To date, the greatest number of elk observed on Zarembo Island occurred on August 16, 2004, when a single herd comprising 36 individuals was observed south of Baht Harbor. In October of 2021, a group of 35 elk were observed in the vicinity of Point Saint John, comprising 21 cows, 7 calves, and 7 bulls.

The island was originally thought to support 2 separate elk herds. However, information gained during aerial shoreline surveys and from a single cow elk radio collared from 2008–2010 suggests that there is one main herd on the island which fragments into smaller groups during the winter and spring months.

In April 2023, the department installed remote game cameras on Zarembo Island to develop a minimum count of bull elk. Camera locations were determined using range data from a cow elk radio collared from 2008–2010, combined with past survey locations, public reports, and evidence of elk habitation. Cameras were serviced (batteries and SD cards replaced) in spring 2024. Images were reviewed and individual bulls were identified using unique antler characteristics. This process was repeated in 2025. In both 2024 and 2025 an estimated 20 bulls were identified using individual antler characteristics. There is no available data to suggest that the Zarembo Island elk population has increased since hunting was discontinued in 2005.

In 2020 the Federal Subsistence Board determined that rural residents of Units 1–5 customarily and traditionally use elk for subsistence on federal lands in Unit 3. Recently proposals have been submitted to the Federal Subsistence Board to establish federal subsistence elk hunts. During the April 2022 Federal Subsistence Board meeting the board adopted a proposal which created a federal year-round season for elk outside of Etolin, Zarembo, Bushy, Shrubby, and Kashevarof

Islands in Unit 3. The adopted federal elk season mimicked a previous state general harvest elk season designed to prevent the expansion and colonization of elk to islands outside of Etolin, Zarembo, Bushy, Shrubby, and the Kashevarof Islands. During the 2019 Southeast Board of Game meeting, the department asked that the state general harvest elk season be eliminated because there was no evidence to verify that elk had colonized additional islands since their introduction in Unit 3, and anecdotal reports suggested that the hunt was being abused to facilitate the taking of elk from Etolin and Zarembo Islands.

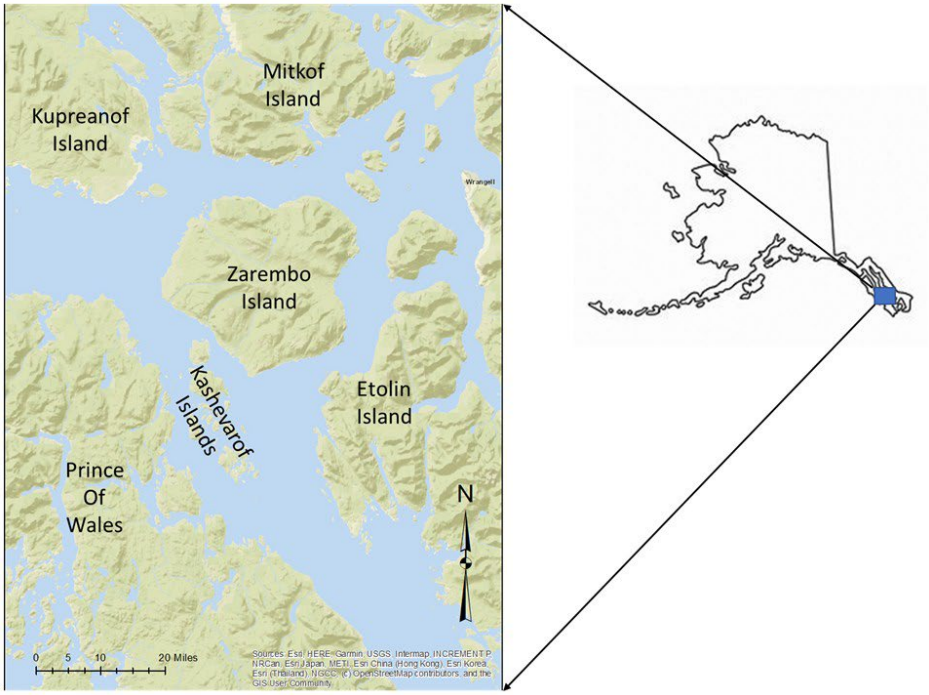

Figure 1. Area reference map.

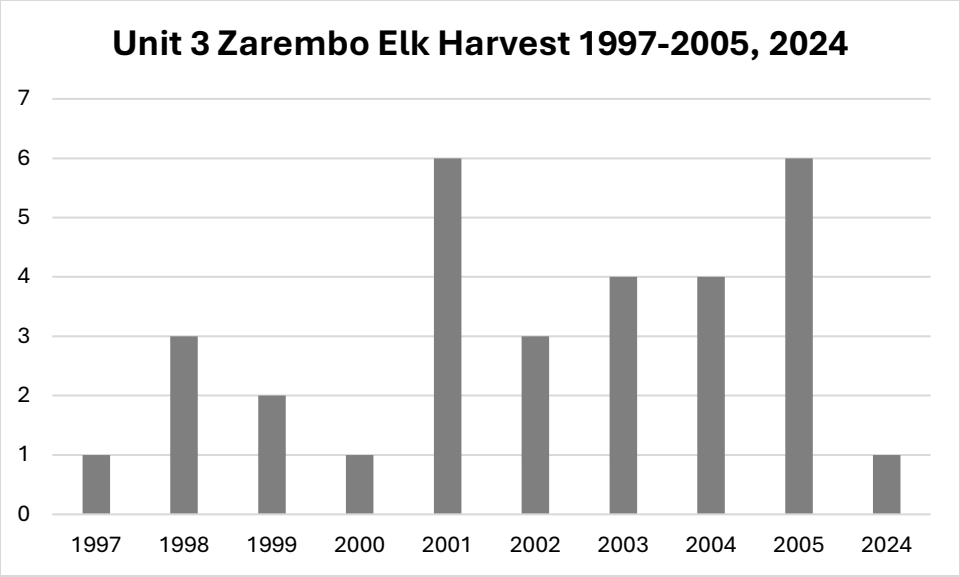

Figure 2. Unit 3 Zarembo Island elk harvest 1997-2005, 2024. There was no legal elk hunting season between 2006 and 2023 on Zarembo Island.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. Based on remote game camera data, most bulls older than 1.5 year-old have at least three points on each antler. The hunt structure as proposed would likely not be sustainable and lead to a conservation concern. If adopted, this will be the first elk hunt with antler restrictions in the state. The department recommends the board adopt hard season dates if the proposal is adopted. With the exception of leap years and seasons ending on the last day in February, all other season dates in regulation are a calendar date.

The department also maintains concern that elk are being illegally harvested on Zarembo Island during the Etolin Island drawing and registration permit hunts. This additional unreported harvest from a relatively small population of elk compromises the long-term stability of the Zarembo Island elk herd.

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

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PROPOSAL 58 – 5 AAC 85.035. Hunting seasons and bag limits for elk. Create a registration permit hunt for elk, with a bag limit of one elk and season dates of August 1 to November 30.

PROPOSED BY: David Powell

WHAT WOULD THE PROPOSAL DO? This proposal would create an unlimited registration permit elk hunt on Zarembo Island with a bag limit of one elk with a season of August 1 to November 30.

WHAT ARE THE CURRENT REGULATIONS?

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(1)		
Unit 3, that portion bounded by a line beginning at the intersection of Stikine Strait and Clarence Strait, running southeast following the midline of Clarence Strait, down to its intersection with Earnest Sound, then northeast following the midline of Earnest Sound, excluding the Niblack Islands, to its intersection with Zimovia Strait, then northwest following the western shoreline of Zimovia Strait to its intersection with Chichagof Passage, then west along the midline of Chichagof Passage to its intersection with Stikine Strait, then west and south along the midline of Stikine Strait, back to the point of beginning.		
1 bull by drawing permit only, and by bow and arrow only; up to 50 permits will be issued; or	Sept. 1−Sept. 30 (General hunt only)	Sept. 1−Sept. 30
1 bull by drawing permit only; up to 250 permits will be issued; or	Oct. 1−Oct. 31 (General hunt only)	Oct. 1−Oct. 31
1 bull by registration permit only	Nov. 15−Nov. 30 (General hunt only)	Nov. 15−Nov. 30

Unit 3, Zarembo Island 1 bull by drawing permit only; up to 25 permits will be issued	Oct. 1–Oct.31	Oct. 1–Oct. 31
Unit 3, Bushy and Shrubby Islands, and the Kashevarof Islands	No open season	No open season
Units 1, 2, and the remainder of Unit 3	No open season	No open season

There is a negative customary and traditional use (C&T) finding for elk in unit 3.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would create a registration hunt for elk for residents and nonresidents on Zarembo Island (Figure 1). Based on aerial survey data, trail camera data, and reports received from the public, the Zarembo Island elk population is estimated to be fewer than 50 total animals. If this proposal were adopted, the long-term stability of the elk herd could be jeopardized. The department anticipates that harvest success would be higher on Zarembo Island than on Etolin Island because of widespread access via logging roads and higher visibility of elk along shorelines.

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

In 1996, the Alaska Board of Game (board) established a bull only drawing hunt in Unit 3. In 2000, the BOG established boundaries for the Unit 3 drawing hunt area. The original drawing hunt area included both Etolin and Zarembo Islands. Between 1997 and 2005, when Zarembo Island was included in the Unit 3 elk hunting area, an average of 3 elk were harvested annually, ranging from one to 6 elk (Figure 2). In 2005, prior to the start of the late-November RE325 elk registration hunt, an emergency order was issued closing the Zarembo Island portion of the hunt area. Based on a previous population estimate, a harvest quota of 10 bulls was established for Zarembo Island. Six bulls were harvested on Zarembo during the September and October drawing permit hunts and managers determined the 4 bulls remaining in the quota were insufficient to allow for an open registration permit hunt. After 6 bulls were harvested during the 2005 season, Unit 3 managers determined harvest had reached an unsustainable level, and elk hunting on Zarembo Island was closed for the next eighteen years. Given such a small allowable harvest, opening the registration elk hunt in this area would have run the risk of overharvest, which would have been detrimental to the long-term stability of the population.

In the aftermath of the 2005 emergency closure of the elk season on Zarembo Island, and prior to the start of the 2006 season, the department made the decision to keep the elk season on Zarembo

Island closed until the population and bull:cow ratio increased. In 2013, following several consecutive years of emergency closures, the board took similar regulatory action, closing Zarembo Island to elk hunting. During the 2023 Southeast Region Board of Game meeting the board adopted a new drawing hunt (DE324) for elk on Zarembo Island. One permit was issued the inaugural season (2024), and one bull was harvested.

Abundance and composition of elk populations cannot be reliably monitored in the dense coastal rainforest of Unit 3, and no data are available to make meaningful elk population composition estimates for Zarembo Island. To date, the greatest number of elk observed on Zarembo Island occurred on August 16, 2004, when a single herd comprising 36 individuals was observed south of Baht Harbor. In October of 2021, a group of 35 elk were observed in the vicinity of Point Saint John, comprising 21 cows, 7 calves, and 7 bulls.

The island was originally thought to support 2o separate elk herds. However, information gained during aerial shoreline surveys and from a single cow elk radio collared from 2008–2010 suggests that there is one main herd on the island which fragments into smaller groups during the winter and spring months.

In April 2023, the department installed trail cameras on Zarembo Island to develop a minimum estimate of bulls. Camera locations were determined using range data from a cow elk radio collared from 2008–2010, combined with past survey locations, public reports, and evidence of elk habitation. Cameras were serviced (batteries and SD cards replaced) in spring 2024. Images were reviewed and individual bulls were identified using unique antler characteristics. This process was repeated in 2025. In both 2024 and 2025, an estimated 20 bulls were identified using individual antler characteristics. There is no available data to suggest that the Zarembo Island elk population has increased since hunting was discontinued in 2005.

In 2020 the Federal Subsistence Board determined that rural residents of Units 1–5 customarily and traditionally use elk for subsistence on federal lands in Unit 3. Recently proposals have been submitted to the Federal Subsistence Board to establish federal subsistence elk hunts. During the April 2022 Federal Subsistence Board meeting, the board adopted a proposal which created federal year-round season for elk outside of Etolin, Zarembo, Bushy, Shrubby, and Kashevarof Islands in Unit 3. The adopted federal elk season mimicked a previous state general harvest elk season designed to prevent the expansion and colonization of elk to islands outside of Etolin, Zarembo, Bushy, Shrubby, and the Kashevarof Islands. During the 2019 Southeast Board of Game meeting, the department asked that the state general harvest elk season be eliminated because there was no evidence to verify that elk had colonized additional islands since their introduction in Unit 3, and anecdotal reports suggested that the hunt was being abused to facilitate the taking of elk from Etolin and Zarembo Islands.

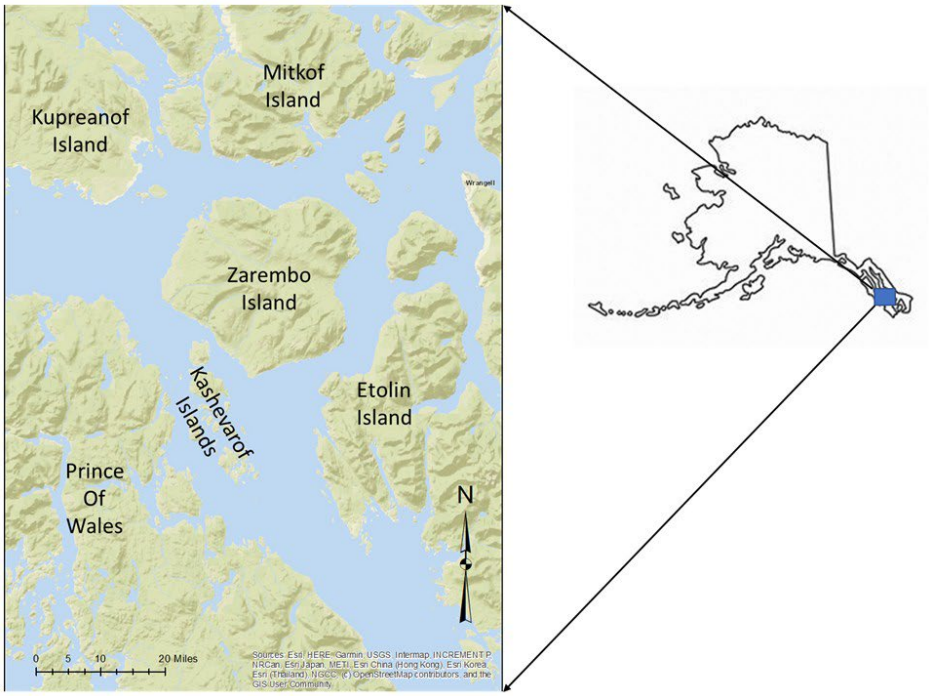

Figure 1. Area reference map.

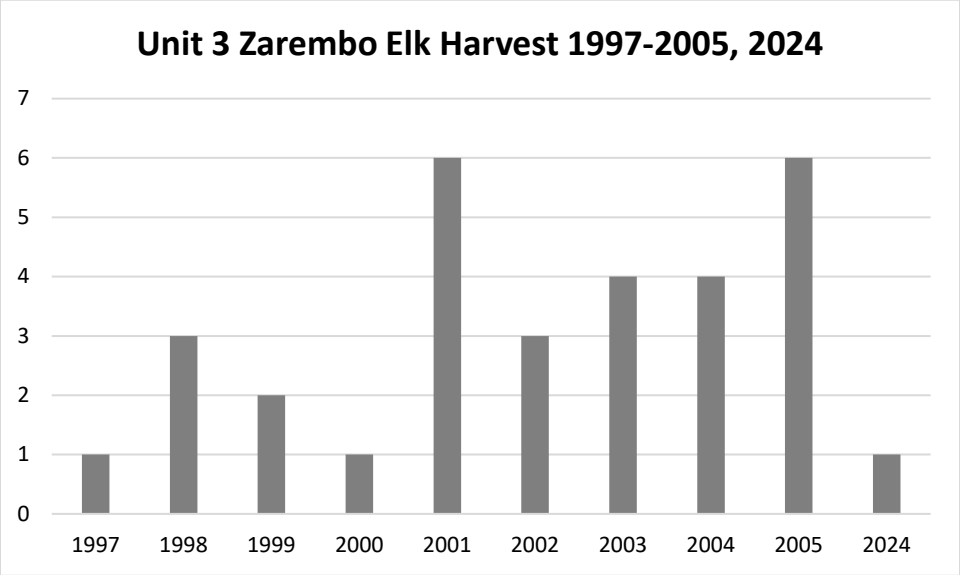

Figure 2. Unit 3 Zarembo Island elk harvest 1997-2005, 2024. There was no legal elk hunting season between 2006 and 2023 on Zarembo Island.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. Adopting an unrestricted registration hunt as proposed would likely not be sustainable, and would further exacerbate existing conservation concerns. Based on aerial survey data, trail camera data, and reports received from the public, the Zarembo Island elk population is estimated to be fewer than

50 total animals. If this proposal were adopted the long-term stability of the elk herd could be jeopardized. The department anticipates that harvest success would be higher on Zarembo Island than on Etolin Island because of widespread access via logging roads and higher visibility of elk along shorelines.

The department also maintains concern that elk are being illegally harvested on Zarembo Island during the Etolin Island drawing and registration permit hunts. This additional unreported harvest from a relatively small population of elk compromises the long-term stability of the Zarembo Island elk herd.

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

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Proposals 59-63

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PROPOSAL 64 – 5 AAC 92.150(c). Evidence of sex and identity. Eliminate the regulation that excludes broken, damaged, or altered antlers from the definition of spike-fork antlers for Units 1B, 1C, and 3.

PROPOSED BY: Wrangell Advisory Committee

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

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.150

(c) If a big game bag limit includes an antler size or configuration restriction, both antlers must be salvaged. A person possessing a set of moose antlers with less than the required number of brow tines on one antler shall leave the antlers naturally attached to the unbroken, uncut skull plate. If antlers or horns must be salvaged, they may not be altered before the completion of all salvage requirements, unless alteration is required under permit conditions. In Unit 1(B), that portion of Unit 1(C) south of Port Hobart, including all Port Houghton drainages, and Unit 3, a damaged, broken, or altered antler is not considered a spike-fork antler as defined in 5 AAC 92.990.

5 AAC 92.990(46)(B)

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

There is a positive customary and traditional use (C&T) finding for moose in Units 1B and 3, with an amount reasonably necessary for subsistence (ANS) of 40 moose and a negative C&T finding for 1C

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Naturally or intentionally broken antlers of moose harvested in RM038 would again meet the definition of spike or fork antlers and be legal for hunters to retain. Because it is difficult to distinguish between naturally and intentionally broken antlers, antlers of any bull moose could be modified to comply with the definition of a spike or fork antler and any bull moose would become legal to harvest which could lead to conservation concerns, particularly in areas with high hunter concentrations.

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

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

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

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

existing regulations. Such antler modifications circumvented the intent of the antler restrictions, compromised the selective harvest strategy, and posed a potential threat to the future productivity of the herd. Between 2015 and 2024, 8% of the RM038 moose harvest did not meet the required antler restrictions, annually ranging from 5 to 12 sublegal bulls. Of the bulls that did not meet the required antler restrictions during this period, 30% did not qualify as spike-forks due to damaged, broken, or altered antlers, ranging annually from 1 to 5 bulls (Figure 1).

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

Over the past 5 seasons, an average of 3 bulls annually have been deemed sublegal under the "damaged, broken or altered" antler regulation. A similar proposal was submitted for the 2023 Southeast Region Board of Game meeting and was not adopted because the board did not want to allow for the harvest of more bulls.

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

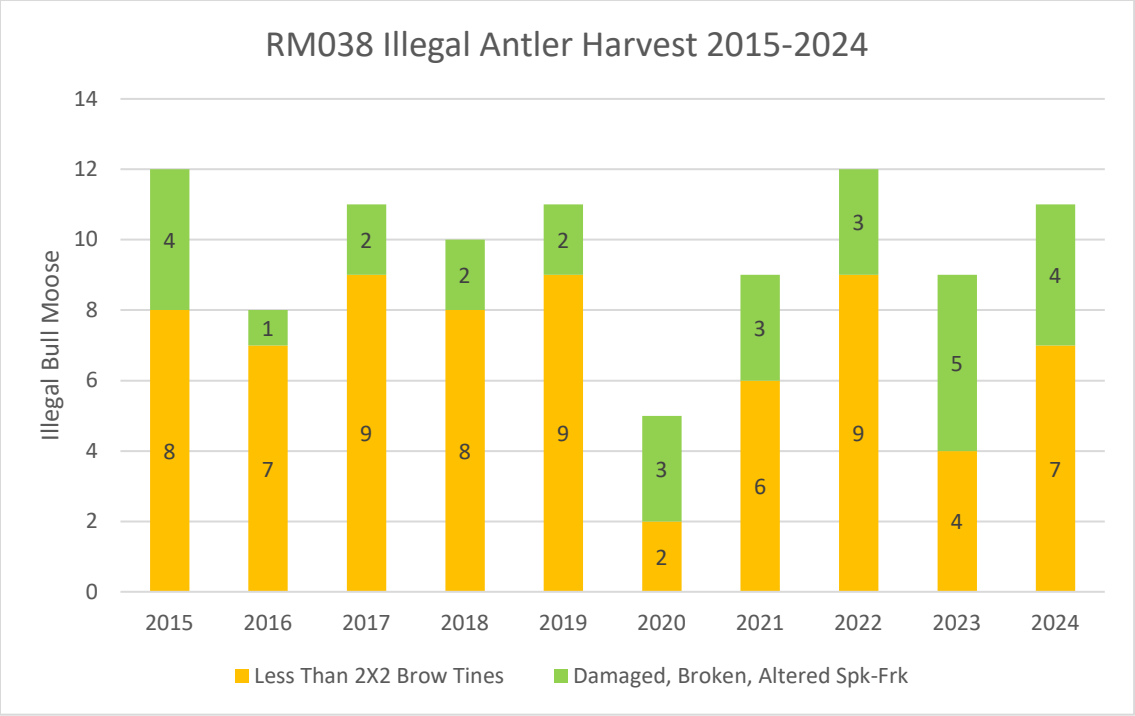

Figure 1. Moose harvest that did not meet the RM038 antler restrictions, regulatory year 2015-2024.

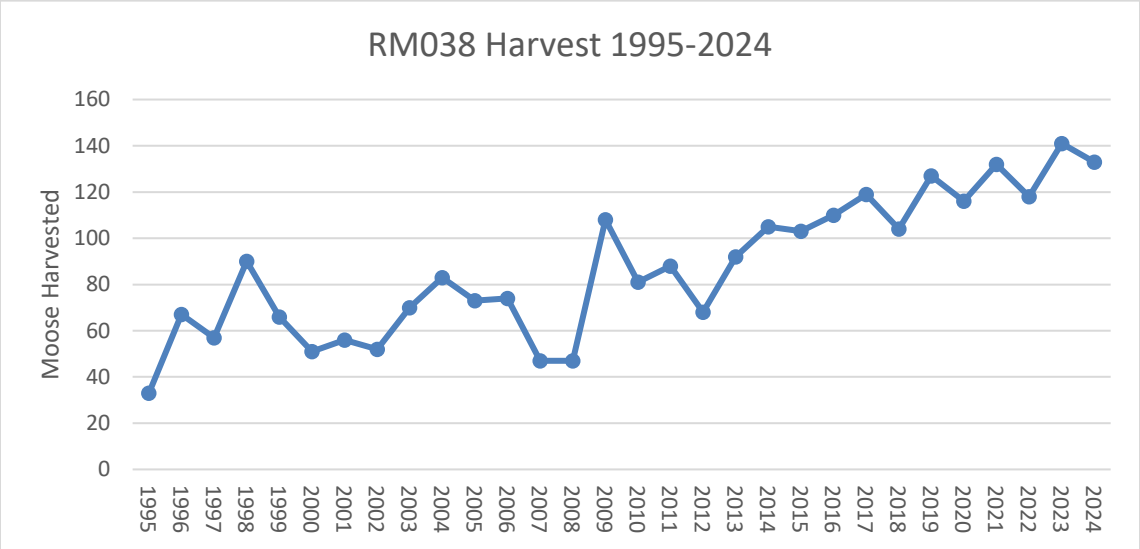

Figure 2. RM038 moose harvest, regulatory year 1995-2024.

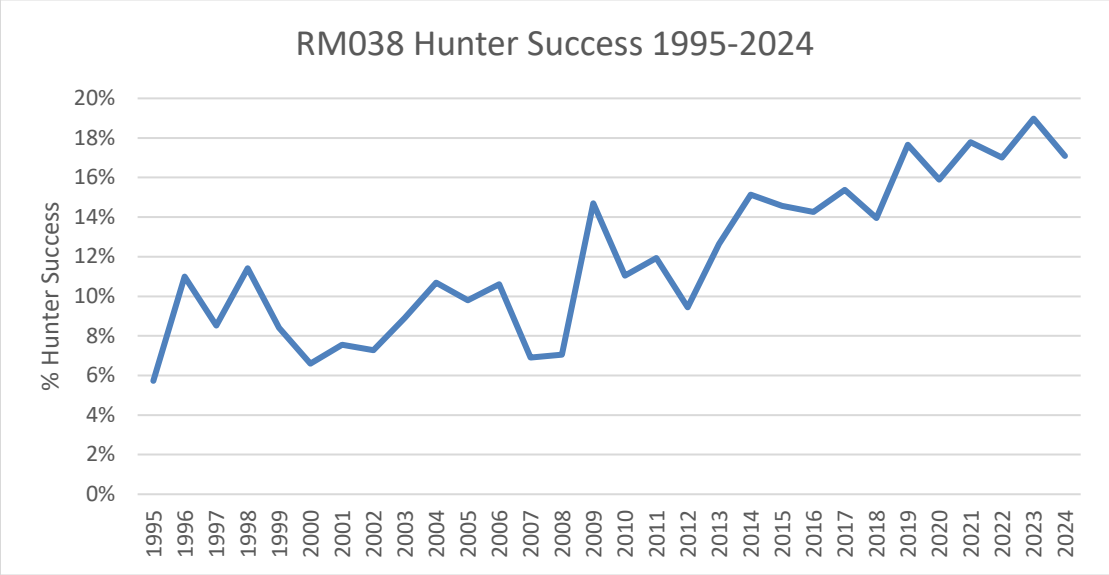

Figure 3. RM038 moose hunter success (%), regulatory year 1995-2024.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. This proposal may represent a liberalization of harvest opportunity in the short term with declining opportunity over time, the change would likely increase harvest for a few years for both residents and nonresidents and then harvest could decline as the number of legal bull moose in the population declines. A declining bull population will result in more conservative management and reduced hunting opportunity in the future. To meet the board's statutory responsibility to the subsistence

law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted

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

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PROPOSAL 65 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Replace the current 4-week antler restricted hunting season with a 2-week hunting season without antler restrictions.

PROPOSED BY: David Powell

WHAT WOULD THE PROPOSAL DO? This proposal would replace the RM038 registration hunt that takes place from September 15 – October 15 with antler restrictions, with a hunt from October 1 – October 15 and no antler restrictions.

WHAT ARE THE CURRENT REGULATIONS?

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

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Units 1(B) and 3 1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on one side or antlers with 2 or more brow tines on each side, by registration permit only	Sept. 15 – Oct. 15	Sept. 15 – Oct. 15

There is a positive customary and traditional use (C&T) finding for moose in units 1B and 3, with an amount reasonably necessary for subsistence (ANS) of 40 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal would remove protection for middle-aged breeding bulls, which could lead to conservation concerns. A shorter moose season could result in increased hunter concentration and competition in the more intensely hunted areas like the Stikine River, which could result in overharvest and reductions to future moose harvest.

BACKGROUND:

Antler restrictions protect a portion of the bull population by allowing hunters to select younger and older bulls. This strategy allows for maximum hunt participation and long seasons while protecting a sufficient number of bulls for breeding.

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

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

The "damaged, broken or altered" antler regulation was deemed necessary to clarify the existing antler restrictions for moose in the RM038 moose hunt, and to exclude from harvest those bulls with antlers that only satisfy the antler point requirements as a result of either naturally occurring breaks or man-made modifications. Prior to implementation of the "damaged, broken or altered" antler regulation, bulls were harvested with broken antlers, or antlers were intentionally modified after harvest to conform to the point requirements specified in the spike-fork provision of the existing regulations. Such antler modifications circumvented the intent of the antler restrictions, compromised the selective harvest strategy, and posed a potential threat to the future productivity of the herd. Between 2015 and 2024, 8% of the RM038 moose harvest did not meet the required antler restrictions, annually ranging from 5 to 12 sublegal bulls. Of the bulls that did not meet the required antler restrictions during this period, 30% did not qualify as spike-forks due to damaged, broken, or altered antlers, ranging annually from 1 to 5 bulls (Figure 1).

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

Over the past 5 seasons, an average of 3 bulls annually have been deemed sublegal under the "damaged, broken or altered" antler regulation. A similar proposal was submitted for the 2023 Southeast Region Board of Game meeting and was not adopted because the board did not want to allow for the harvest of more bulls.

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

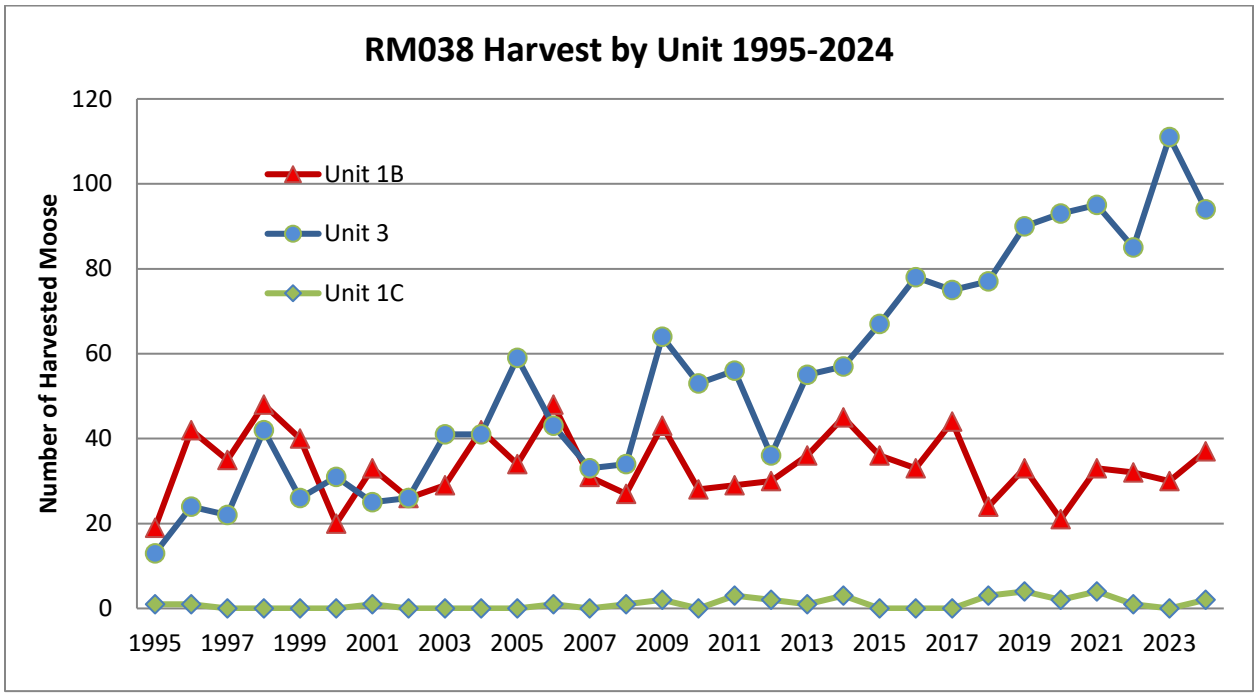

Figure 1. RM038 moose harvest by subunit, 1995-2024.

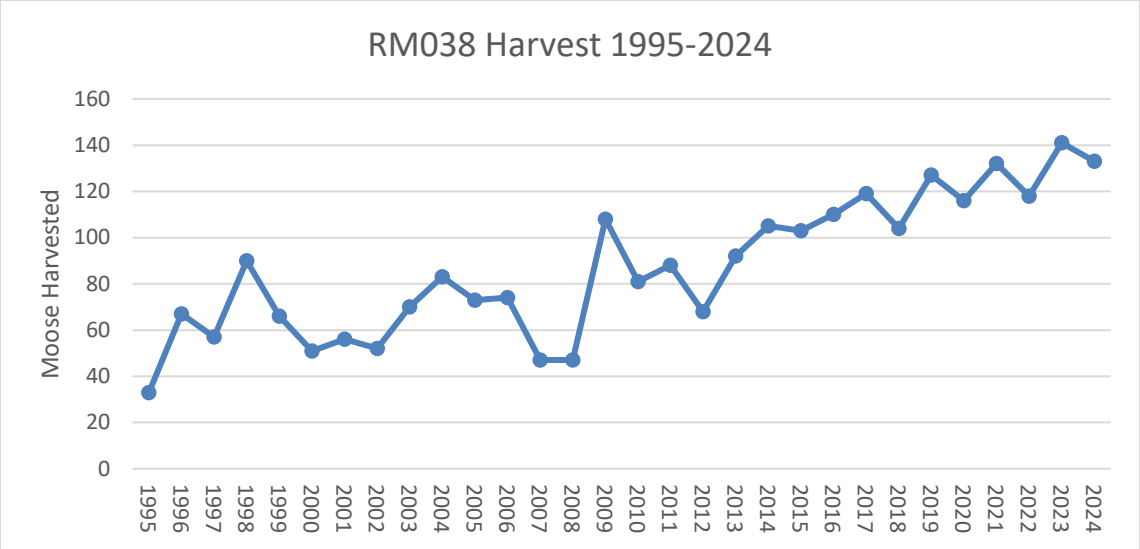

Figure 2. RM038 moose harvest, regulatory year 1995-2024.

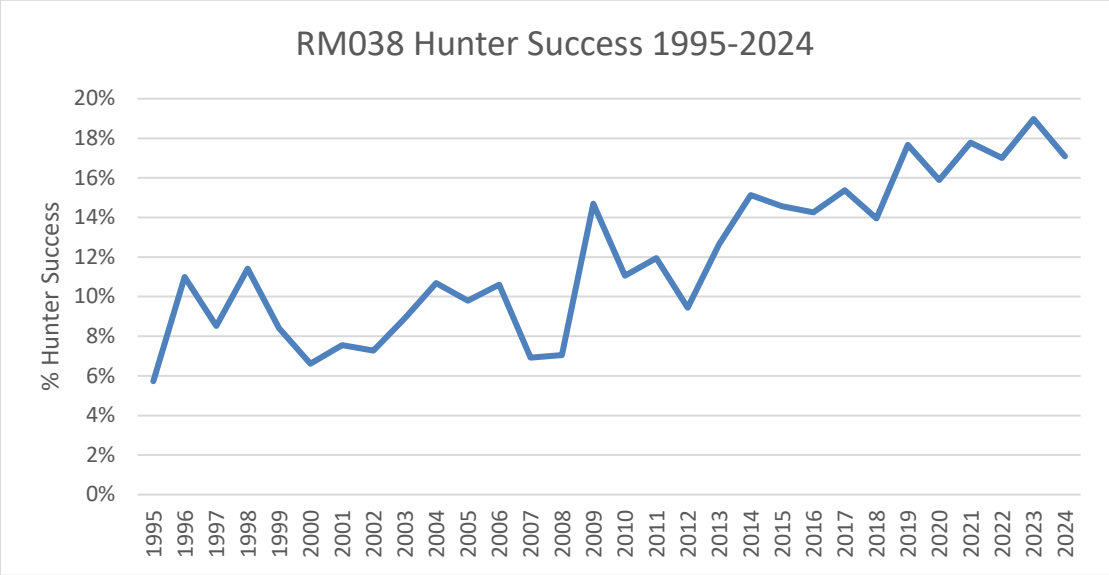

Figure 3. RM038 hunter success, regulatory year 1995-2024.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. Adoption of a shorter hunt with no antler restrictions would likely attract more hunters and increase competition overall. This could result in higher hunter concentrations in areas that are already intensely hunted during the current 4-week season. For example, the Stikine River makes up less than 3% of Unit 1B land area, but over the last 5 seasons, has attracted almost 70% of the unit's reported hunters and accounted for almost 70% of the Unit 1B moose harvest. This change would likely increase harvest for a few years and then harvest and hunter success could decrease

as the number of bull moose in the population declined. A declining population will require more conservative management and will result in reduced hunting opportunity.

Under the current management strategy, moose harvest can continue through the full moose season, but under the proposed season, the department would likely need to close the hunt by Emergency Order at some predetermined harvest level, resulting in less harvest compared to the current system.

To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses of moose in units 1B and 3 if the proposal is adopted.

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

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PROPOSAL 66 – 5 AAC 85.020, and 5 AAC 92.132, Brown bear hunting seasons and bag limits. Change the bag limit for brown bear in Unit 3 to one bear every regulatory year.

PROPOSED BY: Kaleb Baird

WHAT WOULD THE PROPOSAL DO? This proposal would change the bag limit for brown bears in Unit 4 from one bear every 4 regulatory years to one bear every regulatory year.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Unit 3	Mar. 15 – May 31	No open season.
1 bear every 4 regulatory years by registration permit only	Sept. 15 – Dec 31	

There is a positive customary and traditional use finding (C&T) for brown bear in Unit 3, with an amount reasonably necessary for subsistence (ANS) of one animal.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Hunters would not be required to wait 4 regulatory years between the harvest of brown bears in Unit 3. Hunters could harvest a brown bear every regulatory year. The harvest of brown bear in Unit 3 would likely increase, which could result in a conservation concern.

BACKGROUND: Population estimates are not available for brown bears in Unit 3. Information obtained during sealing cannot be used to measure population trends. Although harvest information gained from sealing records, such as average skull sizes, average ages, and sex ratios may provide some indication of brown bear population trends in the absence of accompanying demographic data, correlations between these measures and harvest sustainability continue to be unknown. Research is needed to identify population parameters so area wildlife managers can assess population trends and appropriate harvest levels. Sealing records, department staff observations, pilot observations, and hunters' anecdotal reports indicate the Unit 3 brown bear population is stable at low levels.

Prior to 1985, a hunting season existed for brown bears in Unit 3 from September 15 to May 31. In June 1985, the Board of Game (board) voted to eliminate that season; there was no open season for brown bear in the unit until 2005. During this period, the board considered and rejected numerous proposals to reestablish a brown bear season in Unit 3. At the November 2004 board meeting, the board authorized a resident-only spring season (RB075) for brown bear in Unit 3. While the original intent of the proponent was to establish both spring and fall seasons, a clerical error in the proposal resulted in the inadvertent omission of fall season dates. Between 2015–2019 an average of 19 RB075 permits were issued, with an average of 7 hunters reported hunting, and an average hunter success rate of 3%. From 2020–2024, the average total number of RB075 permits increased to 32, with an average of 10 permittees reported hunting, and an average hunter success rate of 10%.

In 2019, the board authorized a resident-only fall season (RB065) for brown bears in Unit 3. Because of uncertainties about the size of the bear population, and in an effort to limit hunting pressure, the Unit 3 brown bear season is open only to Alaska residents. From 2020–2024, an average of 62 RB065 total permits were issued, with an average of 6 hunters reported hunting, and an average hunter success rate of 4%.

The current Unit 3 harvest objective is to limit the annual harvest to no more than 3 bears.

Since the establishment of the Unit 3 RB075 spring brown bear registration hunt in 2004, a total of 11 brown bears have been harvested (7 males, 4 females). Since 2019, only a single female brown bear has been harvested during the RB065 fall brown bear registration hunt.

Over the last 10 years, the total Unit 3 brown bear mortality averaged 1.3 bears, ranging from 0 to 4 (Figure 1). Hunters sealed 7 brown bears between 2015–2024, with 4 brown bears taken under the defense of life and property provision, and 2 brown bears were killed illegally. Males made up 77% of the total harvest. Of the 7 bears taken by hunters, 6 were harvested in the spring.

The majority of brown bear mortality in Unit 3 occurs on Wrangell, Etolin, and Mitkof islands.

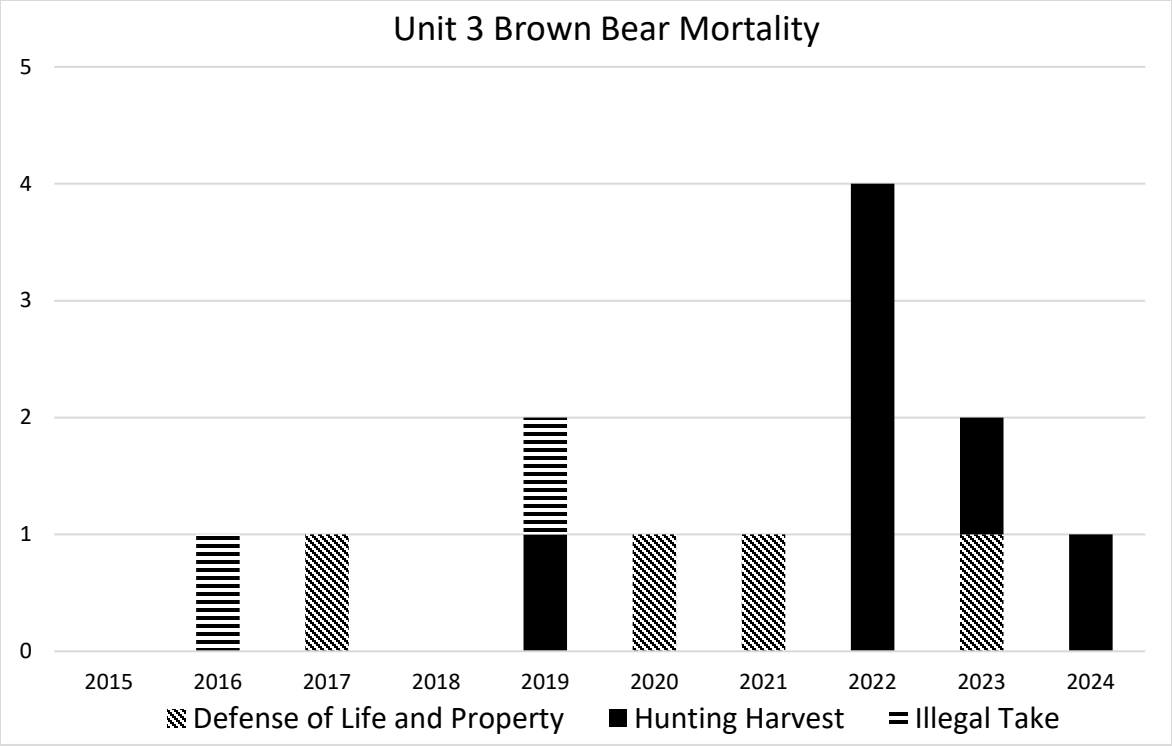

Figure 1. Unit 3 brown bear harvest, 2015–2024.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal due to the negative impacts it could have on the Unit 3 brown bear population.

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

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PROPOSAL 67 – 5 AAC 92.510 (5)(B) Areas Closed to Hunting, 5AAC 92.530 (24) Management Areas. Eliminate the Petersburg Road System Closed Area and include the area as part of the Petersburg Management Area, to allow for big game hunting by archery only.

PROPOSED BY: Kaleb Baird

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the Petersburg Road System Closed Area and the area would be added to the Petersburg Management Area with a deer season running from August 1 to December 15, and a 2 buck bag limit. In addition, this proposal would create an archery-only area for black bear, brown bear, and moose. It would also create a weapons-restricted wolf hunt in an area that currently has no weapons restrictions for wolf.

WHAT ARE THE CURRENT REGULATIONS?

5AAC 92.510(a)(5)(B): Mitkof Highway Closed Area

“a strip one-fourth mile wide on each side of the Mitkof Highway from mile marker 8.75 of the Mitkof Highway to mile marker 17.22 is closed to the taking of big game, except wolves”

5AAC 92.530 (24): Petersburg Management Area

“the area consists of that portion of Unit 3 on Mitkof Island north and west of a line from Frederick Point to the highest point in Section 8, T59S, R80E, to the highest point in Section 7, T59S, R80E, to the highest point in Section 13, T59S, R79E, to the highest point in Section 23, T59S, R79E; then due south to 56º 42’24” N”

There is a positive customary and traditional use (C&T) finding for deer in unit 3, with an amount reasonably necessary for subsistence (ANS) of 150-175 deer; a positive C&T finding for black bear Unit 3 with an ANS of 15; a positive C&T finding for brown bear in Units 1(B) and 3 with an ANS of 1 animal; a positive C&T finding for moose in Units 1(B) and 3 with an ANS of 40; and a positive C&T finding for wolves in Unit 3 with an ANS of 90% of the harvestable surplus.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted the Petersburg Road System Closed Area would be eliminated and the area would be added to the Petersburg Management Area with a deer hunting season running from August 1 to December 15, and a 2-buck bag limit. Adoption of this proposal would also result in creating an archery-only area for black bear, brown bear, and moose, and restrict the harvest of wolves to archery-only. Adoption of this proposal would likely result in user conflicts and public safety concerns. Multiple homes and privately owned properties are located between the Petersburg city limits and approximately mile 10 of the Mitkof Highway.

BACKGROUND:

The Board of Game (board) created the Petersburg Road System Closed Area in 1962 extending from the Petersburg city limits (mile 8.75) to mile 18, then extending to mile 24 in 1964 (Figure 1). In 1986, the closed area was shortened to the Crystal Lake campground (mile 17.22). The Petersburg Road System Closed Area encompasses commercial businesses, multiple private homes, and recreation areas. Other major communities in Southeast Alaska have similar closed areas (Juneau, Ketchikan, Sitka, Wrangell, Haines).

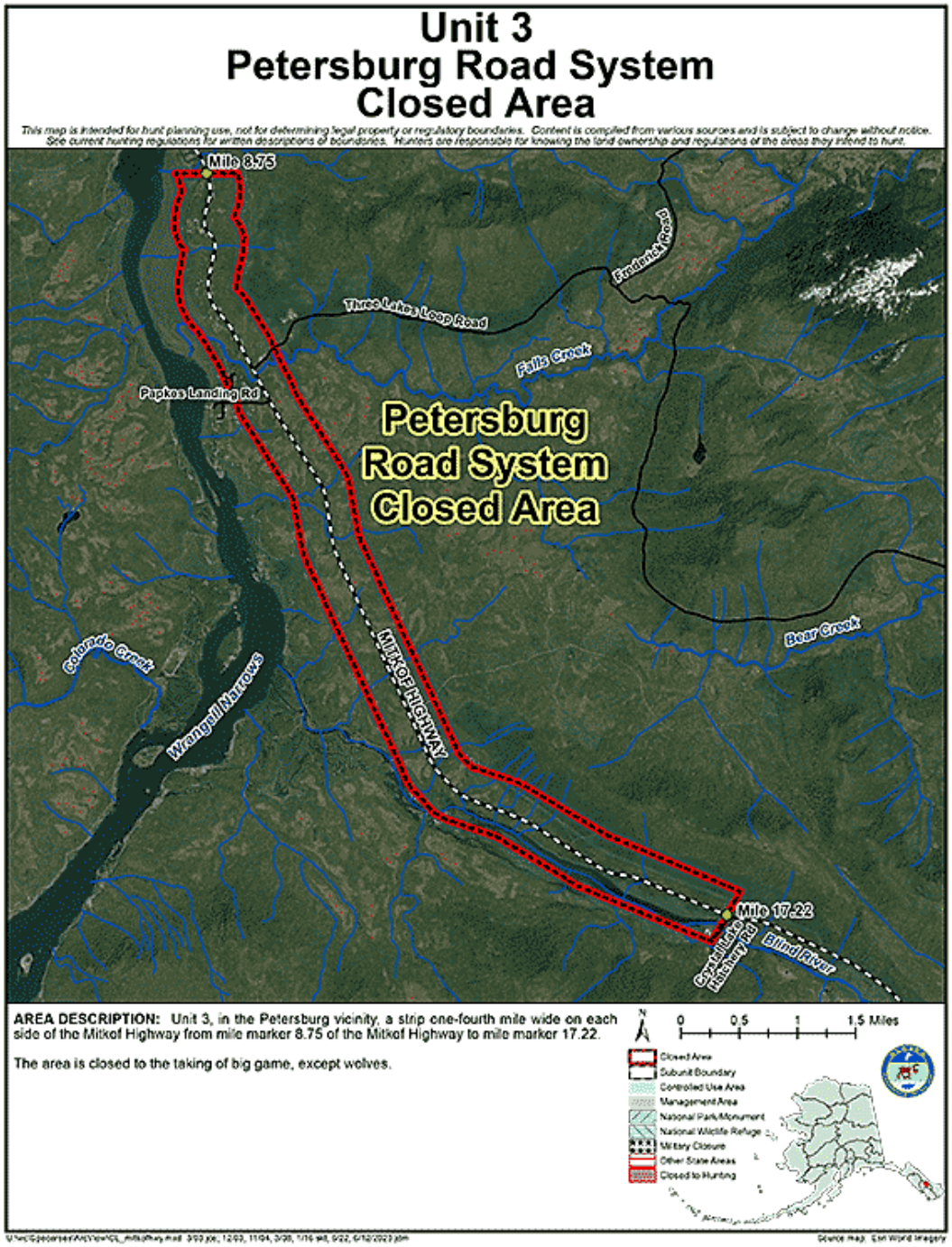

Figure 1. Game Management Unit 3 Petersburg Road System Closed Area.

The Petersburg Management Area (PMA) on Mitkof Island was originally established as an archery-only hunt area in 2002, primarily in response to complaints about high deer numbers in residential Petersburg (Figure 2). Prior to this time, a city prohibition on the discharge of firearms and state regulatory language prohibited deer hunting within the Petersburg city limits. High deer density in residential areas, bolstered by artificial food sources and reported

intentional feeding, gave rise to frequent complaints about nuisance deer problems and public safety concerns associated with vehicle-deer collisions.

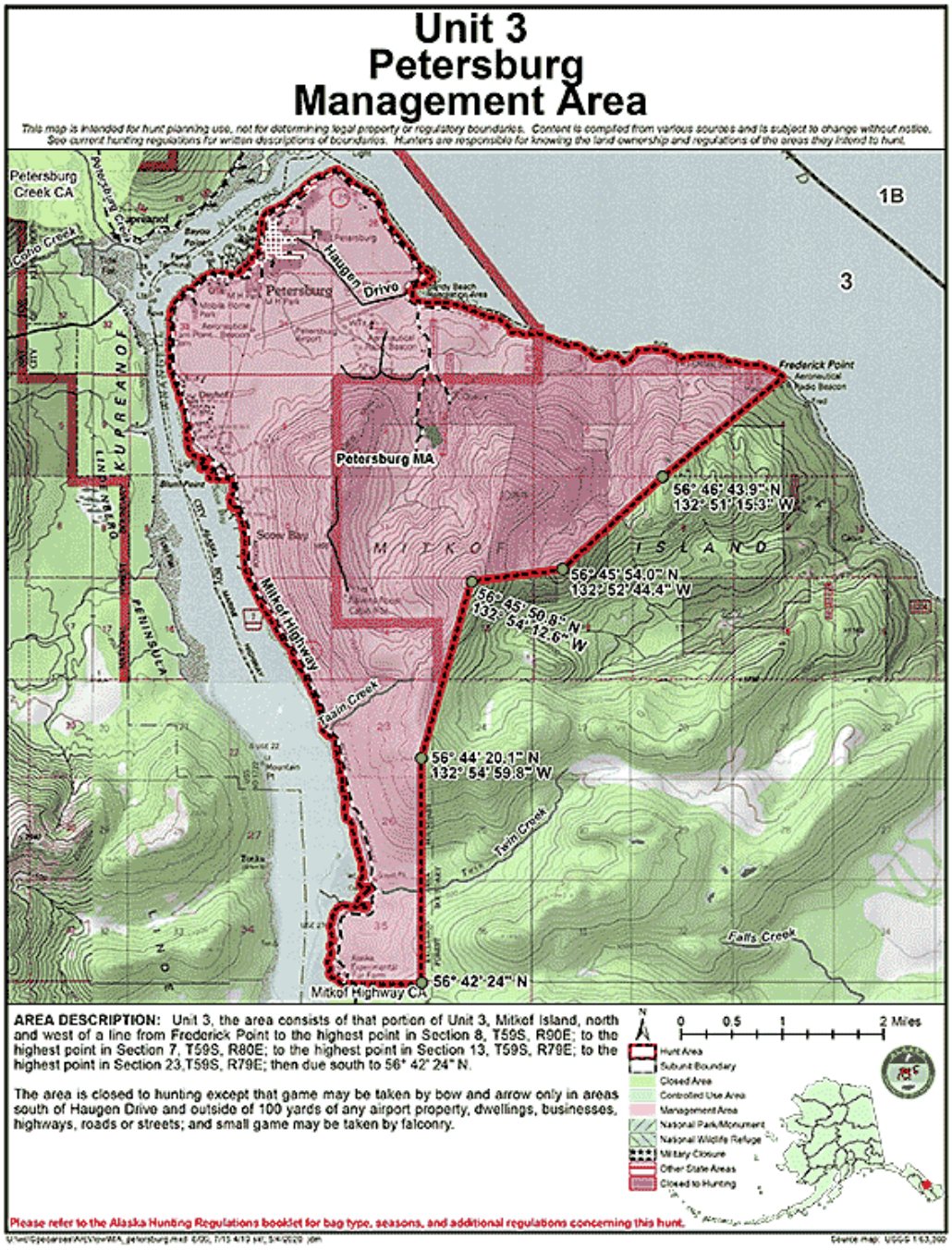

Figure 2. Game Management Unit 3 Petersburg Management Area.

When the PMA was created, deer hunting in the remainder of Mitkof Island was managed under a restrictive 2 week deer season with a one buck bag limit. The deer season in the PMA was designed to provide archers with an additional 2 weeks of hunting opportunity and afforded them a 1 month season (Oct. 15-Nov. 15) during the deer rut. In 2007, the deer season was extended in

the PMA by 1 month and the bag limit increased to 2 bucks. The season was extended by 2 weeks in 2019 to align with an adopted extension of the Mitkof Island general deer season. In 2023, the PMA season was extended again by 2 months to provide an early season alpine hunting opportunity close to the town of Petersburg. The current PMA deer season is 4.5 months long, running from August 1 to December 15, with a 2 buck bag limit. Hunting within the PMA requires that hunters be International Bow Hunter Education Program certified.

The PMA is relatively small in area (approx. 10 mi^2.) and the total reported harvest over the last 5 seasons was 6 deer, with a range of 5 to 10.

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

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal as there is no biological concern for additional harvest on Mitkof Island. This is an allocative issue between user groups. Hunting where the prevalence of homes and private land is high could result in user conflicts and public safety concerns. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses of wolves if the proposal is adopted.

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

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PROPOSAL 68 – 5 AAC 92.510 (5)(D) Areas Closed to Hunting, 5AAC 92.530 (24) Management Areas. Eliminate the Blind Slough Closed Area and include the area as part of the Petersburg Management Area, to allow for big game hunting by archery only.

PROPOSED BY: Kaleb Baird

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the Blind Slough Closed Area and add the area to the Petersburg Management Area with a deer season running from August 1 to December 15, and a 2-buck bag limit. In addition, this proposal would create an archery-only area for black bear, brown bear, moose, and wolves.

WHAT ARE THE CURRENT REGULATIONS?

5AAC 92.510(a)(5)(D): Blind Slough Closed Area

"a strip one-fourth mile wide on each side of Blind Slough, from the hunting closure markers at approximately mile 15.1 to the hunting closure markers at approximately mile 18.4 of the Mitkof Highway, including the waters of Blind Slough between those hunting closure markers, is closed to hunting"

5AAC 92.530 (24): Petersburg Management Area

“the area consists of that portion of Unit 3 on Mitkof Island north and west of a line from Frederick Point to the highest point in Section 8, T59S, R80E, to the highest point in Section 7, T59S, R80E, to the highest point in Section 13, T59S, R79E, to the highest point in Section 23, T59S, R79E; then due south to 56º 42’24” N”

There is a positive customary and traditional use (C&T) finding for deer in Unit 3, with an amounts reasonably necessary for subsistence of 150-175 deer; a positive C&T finding for black bear Unit 3 with an ANS of 15; a positive C&T finding for brown bear in Units 1(B) and 3 with an ANS of 1 animal; a positive C&T finding for moose in Units 1(B) and 3 with an ANS of 40; and a positive C&T finding for wolves in Unit 3 with an ANS of 90% of the harvestable surplus.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted the Blind Slough Closed Area would be eliminated and the area would be added to the Petersburg Management Area with a deer season running from August 1 to December 15, and a 2 buck bag limit. Adoption of this proposal would also result in creating an archery-only area for black bear, brown bear, moose, and wolves.

BACKGROUND: The Alaska Board of Game (board) created the Blind Slough Closed Area in 1976 which encompasses multiple recreation areas including the US Forest Service administered Swan Observatory Wildlife Viewing Site and Blind Slough Picnic Area (Figure 1). The closed area also includes the Blind Slough Hydroelectric Plant and the Crystal Lake Hatchery. These recreation areas are popular with Petersburg residents for fishing, wildlife photography and viewing, and other recreational activities. The Crystal Lake Hatchery includes multiple residences for its staff.

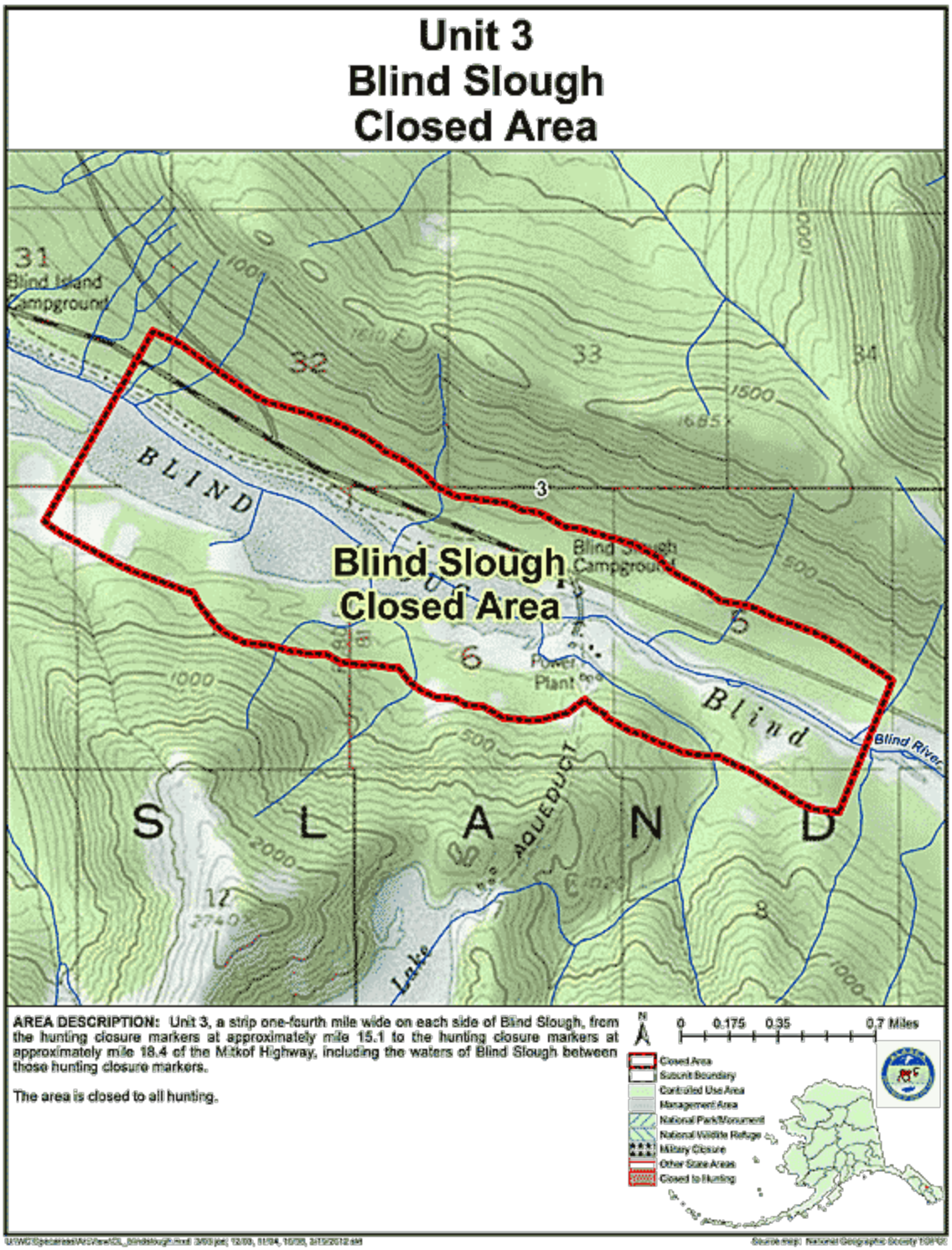

Figure 1. Game Management Unit 3 Blind Slough Closed Area.

The Petersburg Management Area (PMA) on Mitkof Island was originally established as an archery-only hunt area in 2002, primarily in response to complaints about high deer numbers in residential Petersburg (Figure 2). Prior to this time, a city prohibition on the discharge of firearms and state regulatory language prohibited deer hunting within the Petersburg city limits.

High deer numbers in residential areas, bolstered by artificial food sources and reported intentional feeding, gave rise to frequent complaints about nuisance deer problems and public safety concerns associated with vehicle-deer collisions.

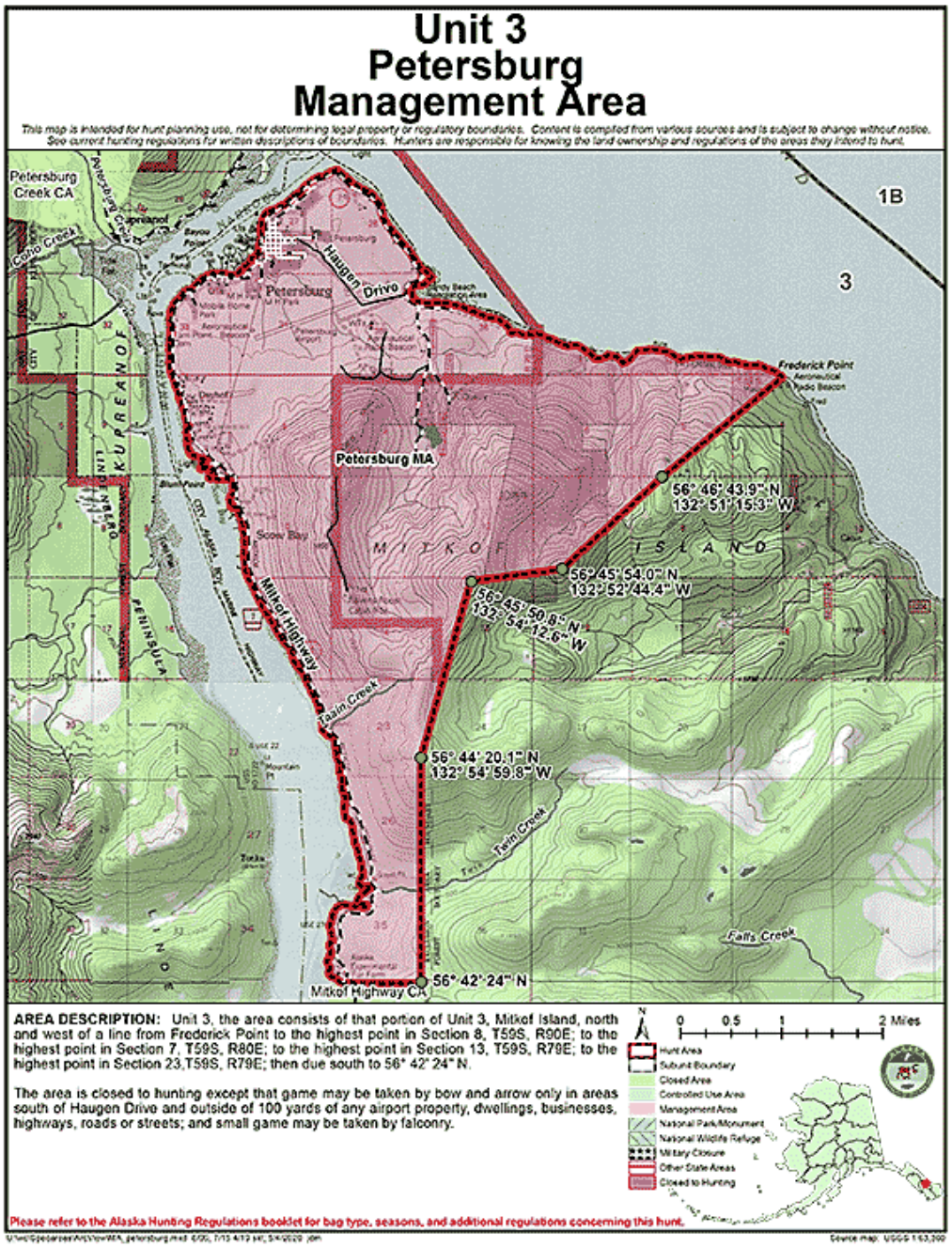

Figure 2. Game Management Unit 3 Petersburg Management Area

When the PMA was created, deer hunting in the remainder of Mitkof Island was managed under a restrictive 2 week deer season with a 1 buck bag limit. The deer season in the PMA was designed to provide archers with an additional 2 weeks of hunting opportunity and afforded them

a 1 month season (Oct. 15-Nov. 15) during the deer rut. In 2007, the season was extended in the PMA by 1 month and the bag limit increased to 2 bucks. The season was extended by 2 weeks in 2019 to align with an adopted extension of the Mitkof Island general deer season. In 2023, the PMA season was extended again by 2 months to provide an early season alpine hunting opportunity close to the town of Petersburg. The current PMA deer season is 4.5 months long, running from August 1 to December 15, with a 2 buck bag limit. Hunting within the PMA requires that hunters be International Bow Hunter Education Program certified.

The PMA is relatively small in area (approx. 10 mi^2) and the reported average harvest over the last 5 seasons was 6 deer, ranging from 5 to 10.

The PMA and Blind Slough Closed Area are not immediately adjacent and separated by approximately 6.25 miles.

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

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is primarily an allocative issue between user groups. While some additional harvest for deer in the area would not create a biological concern, the proposal would open this relatively small area to the take of black bear, brown bear, moose and wolves, and harvest of those species is closely monitored to prevent overharvest.

Because of its proximity to Petersburg and ease of access, the Blind Slough Closed Area is popular with sport fishermen, and wildlife photographers and viewers. Hunting in the area when sport fishing and wildlife viewing activities are high could result in user conflicts and public safety concerns.

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

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PROPOSAL 69 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Lengthen the grouse hunting season in Unit 3 by one month.

PROPOSED BY: Kaleb Baird

WHAT WOULD THE PROPOSAL DO? This proposal would change the season dates for grouse in Unit 3 by adding an additional 4 weeks in the spring, from August 1–May 15 to August 1– June 15 for residents and nonresidents.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 85.065

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Units and Bag Limits	Resident & Nonresident Open Season (Subsistence & General Hunts)
Units 1 – 6 5 per day, 10 in possession	Aug. 1 – May 15

The board has not determined if there are customary and traditional uses of grouse in Unit 3.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this proposal would extend the hunting season for grouse in Unit 3 by 31 days from the current dates of August 1–May 15 to August 1–June 15.

BACKGROUND: The current hunting season dates (August 1–May 15) for Unit 3 have been in place since the 1987-88 hunting season and the bag and possession limits have remained the same since the 1965-66 hunting season. Currently, grouse hunting seasons across the rest of Alaska begin on August 10; two exceptions are Unit 14C (September 1) and Unit 20D (August 25). Most seasons end on either March 31 or April 30.

The department has limited grouse and ptarmigan harvest data from Southeast Alaska. The harvest data available is mostly from sooty grouse, and is voluntarily submitted by hunters. These data only provide information on timing of harvest as well as age- and sex-ratios of the harvest. Of the 524 sooty grouse wings donated to the department since the 2012–13 hunting season, 78% (n = 410) were from birds harvested during the months of April and May, and only 3% (n = 15) were from harvests occurring during the month of August. Of the 395 sooty grouse wings submitted from harvests during the months of April and May, where identification of sex was possible, 88% (n = 346) were males. Caution is warranted using these data to draw strong conclusions due to the small number of wings donated and the small number of hunters participating in the voluntary program each year. However, the wing data suggest that most of the sooty grouse harvest is of males and occurs during the spring breeding period when male sooty grouse are more conspicuous to hunters. Also, the data suggest that harvest of females may be highest during the spring as well, as 54% of donated wings from females were taken during the months of April and May.

While there is limited data available on grouse nesting ecology for Southeast Alaska, a study conducted from 2007-2008 (Nelson 2010) documented nesting activity from May 14 to July 1 for spruce grouse on Prince of Wales Island (POW). Similarly, hatch data from a study of sooty grouse in British Columbia indicated nest initiation for sooty grouse may begin as early as May 7 (range: May 7-May 17; Bendell 1954). Hatch data from the same 3-year study in B.C. documented 80% of broods hatched between June 8 and June 28. Nesting and hatch data suggest

extending the grouse hunting season to June 15 will overlap with nesting and very likely the early brood-rearing period for sooty grouse in Unit 3.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. Grouse hunters enjoy a 9.5-month hunting season. Recognizing the majority of grouse are taken in the spring, extending the hunting season for grouse to June 15 will result in additional harvest during the nesting period and very likely the early brood rearing period. Although harvest of females appears to be limited compared to males, most female harvest wing submissions come from the months of April and May. Additional harvest of females during the latter part of the nesting season and early brood-rearing period would result in a conservation concern.

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

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