

# Southeast Region

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**ALASKA BOARD OF GAME**  
**Southeast Region Meeting**  
**The Landing Hotel, Ketchikan, Alaska**  
**January 20-24, 2023**

**TENTATIVE AGENDA**

**Note: This Tentative Agenda is subject to change throughout the course of the meeting.** It is provided to give a general idea of the board's anticipated schedule. The board will attempt to hold to this schedule; however, the board is not constrained by this Tentative Agenda.

**Friday, January 20, 8:30 a.m.**

OPENING BUSINESS

- Call to Order / Purpose of Meeting
- Introductions of Board Members and Staff
- Board Member Ethics Disclosures

AGENCY AND OTHER REPORTS (See List of Oral Reports)

PUBLIC & ADVISORY COMMITTEE TESTIMONY upon conclusion staff reports

**THE DEADLINE TO SIGN UP TO TESTIFY will be announced prior to the meeting.** Public testimony will continue until persons who have signed up before the deadline, and who are present when called by the Chair to testify, are heard.

**Saturday, January 21, 8:30 a.m.**

PUBLIC AND ADVISORY COMMITTEE ORAL TESTIMONY continued

BOARD DELIBERATIONS upon conclusion of public testimony

**Sunday, January 22, 9:00 a.m.**

BOARD DELIBERATIONS upon conclusion of public testimony

**Monday, January 23 8:30 a.m.**

BOARD DELIBERATIONS continued

**Tuesday, January 24, 8:30 a.m.**

BOARD DELIBERATIONS conclude

MISCELLANEOUS BUSINESS, including petitions, findings and policies, letters, and other business

ADJOURN

**Agenda Notes**

- A. Meeting materials, including a list of staff reports, a roadmap, and schedule updates, will be available prior to the meeting at: [www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo](http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo) or by contacting ADF&G Boards Support Section in Juneau at 465-4110.
- B. A live audio stream for the meeting is intended to be available at: [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)
- C. The State of Alaska Department of Fish and Game complies with Title II of the Americans with Disabilities Act of 1990 (ADA). Individuals with disabilities who may need auxiliary aids, services, and/or special modifications to participate in this hearing and public meeting should contact 465-6098 no later than two weeks prior to start of the meeting to make any necessary arrangements.

# **Regionwide & Multiple Units**

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## **PROPOSAL 1**

### **5 AAC 92.003. Hunter education and orientation requirements.**

Require certified hunter safety education to hunt in Units 1 - 5 as follows:

Amend Section 5 AAC 92.003 to include:

Beginning January 2025, a person born after January 1, 2010 that is required to have a hunting license must have successfully completed a certified hunter education course in order to hunt in Units 1, 2, 3, 4, and 5. Additionally, if you are under 18 years of age, you must have either successfully completed a certified hunter education course or be under the direct immediate supervision of a licensed hunter who is: (a) 18 years of age or older and has successfully completed a certified hunter education course OR (b) born on or before January 1, 2010.

**What is the issue you would like the board to address and why?** Requiring a certified hunter education course to hunt in Units 1, 2, 3, 4, and 5 will lead to safer more informed hunters. ADF&G reports that “hunter education courses have dramatically reduced hunting related firearms accidents — up to 75% in some states — and have brought about positive change in hunter skills, attitudes, and behavior.” Over the last twenty years, barriers to accessing hunter education course have come down, especially with the advent of hybrid and online versions of the curriculum. We would like to follow other Units and require hunter safety for Units 1 - 5. Adopting this proposal will make hunting safer for everyone in our region.

**PROPOSED BY:** Juneau-Douglas Fish and Game Advisory Committee (EG-F22-118)

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## **PROPOSAL 2**

### **5 AAC 92.003. Hunter education and orientation requirements.**

Require hunter orientation for hunting goat in Southeast Region units as follows:

All hunters must complete the goat hunter orientation prior to hunting. Orientation and quiz are available online at XXXXXXXXXX.

-Rocky Mountain Goat alliance has a YouTube video and are currently making another revision to assist goat hunters. I have asked the board if they would work with ADF&G biologists on a video and quiz and they are in support.

**What is the issue you would like the board to address and why?** I believe that there will be a “trickle down effect” from the dwindling sheep numbers, where many sheep hunters will now look to other species. I believe that goat hunting will become more prevalent over the next few years. My concern is that with the increase in goat hunting, there will be an increase in novice goat hunters. This is of grave concern for the harvest of nannie and sub-adult goats. I believe an educational video, such as was done for bear and moose, should be mandatory for all goat hunts.

**PROPOSED BY:** Brian Watkins (EG-F22-008)

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**PROPOSAL 3**

**5 AAC 92.165. Sealing of bear skins and skulls.**

Remove the requirement for residents to seal black bear skulls harvested in Units 1 - 4 as follows:

Eliminate the need for resident black bear hunters in Units 1 - 4 to have black bear skulls sealed.

**What is the issue you would like the board to address and why?** The regulation to require resident black bear hunters to have black bear skulls sealed should be eliminated. This is unnecessary burden on resident hunters such as myself that live far away from a sealing officer. I live on a boat and cruise to remote southeast Alaska locations.

Sealing nonresident black bear skulls should provide enough information for ADF&G. It would be reasonable to have resident hunters report their kill as to where, when, and what sex was taken.

**PROPOSED BY:** Mark Freshwaters (EG-F22-117)

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**PROPOSAL 4**

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

Change the resident bag limit for brown bear in Unit 1 to one bear every two years as follows:

Change the harvest limit for resident brown bear in Unit 1, from one brown bear every four years to one brown bear every two years.

**What is the issue you would like the board to address and why?** Currently Southeast Alaska residents can only harvest one brown bear every four regulatory years and this needs to change in order to align with the ADF&G mission to manage wildlife. There is no data or science showing that brown bears in Unit 1 have any population concerns, but rather have high densities and actually show evidence of population increase in areas on the Chilkat Peninsula, Tracy Arm, Endicott Arm, and south to Port Houghton (Scott 2009). As a year-round sportsman, I have seen the increase in older brown bears on trail cams which supports the trend of an increasing population. The Southeast Brown Bear Management Plan has not been changed in over 20 years and the one every four years was initiated in 1968 with no update to this timeframe in over 50 years. To further support this change, it has been shown that when RB063 and RB073 (Berners Bay area) went from one bear every four regulatory years to one bear every regulatory year in 2013, the harvest did not increase in an area that is close to, and easy to access by Juneau residents. Registration permits provide accurate in season management data to help managers monitor harvest closely. In the event that managers felt that too many bears were being harvested, they can always issue an emergency order. In other areas of the state, Unit 13 for example, liberalizing the brown bear harvest actually helped the overall numbers of brown bears (the land only has so much carrying capacity for large apex predators) as well as bolstered ungulate populations. Another need for this change is that British Columbia has not allowed any hunting of brown bears since December 2017.

This change will benefit the wildlife as well as resident hunters.

**PROPOSED BY:** Jesse Ross (EG-F22-103)

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**PROPOSAL 5**

**5 AAC 85.065. Hunting seasons and bag limits for small game.**

Change the waterfowl season in Units 1 - 4 by creating a split season as follows:

5 AAC 85.065. (a)(4)(A) Duck (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

Season split recommendations will be determined through advisory committees and presented to the Board of Game at the January 2023 meeting.

An example configuration of a two-segment ‘split’ open season for Units 1 - 4: Sept. 1 – Nov. 23; Dec. 9 – Dec. 31

**What is the issue you would like the board to address and why?** At the Southeast Region meeting in 2019, the Board of Game (board) adopted an amended proposal to set the season dates in Units 1 - 4 (Southeast Migratory Bird Hunt Zone) for hunting migratory game birds to September 16 – December 31 in even numbered years and September 1 – December 16 in odd numbered years. This action by the board was intended to accommodate a public desire to better align hunting opportunity with species-specific abundance corresponding to the general fall movement and winter settling patterns of migratory game birds (e.g., hunting early season migrants vs. late season wintering birds). Federal regulations prohibited the board from considering a two-segment or ‘split’ season configuration (open – closed – open) to address the issue – Alaska is allowed a single split season, which at the time was assigned to the Kodiak Zone (Unit 8). A split season is structured with a mid-season closure to extend the early and/or late hunting dates, within the federal framework season length of 107 days.

The current regulation of odd-even numbered year season dates creates a regulatory burden in the Southeast Zone via inconsistent interannual season dates that adds complexity for hunters, enforcement, and the regulations publication process. In addition, the current regulation reduces early or late season hunting opportunity in alternating years by shifting between early and late open/closed season dates. In even numbered years, hunting opportunity for early migrant game birds is reduced and likewise in odd numbered years, opportunity is reduced for late migrant species that winter in the Southeast Region, such as sea ducks.

Since the 2019 Southeast Region meeting, federal regulations were modified to reassign Alaska’s single split season option from the Kodiak Zone to the Southeast Zone (Units 1 - 4), allowing this option to be considered in state regulation. Accordingly, the department recommends implementing a split season in Units 1 - 4 to hunt migratory game birds. The benefit of this regulation change is establishing a consistent set of interannual season dates, thereby reducing regulatory complexity, while allowing in-season early and late hunting opportunity to satisfy better hunting season alignment with species-specific abundance.

The department proposes a regulation change that includes replacing the current regulation of odd-even numbered year season dates in Units 1 - 4 with a two-segment ‘split’ season structure; open on September 1 – closed for up to 2 + weeks – reopen until the end of 107 days for:

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-057)

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**PROPOSAL 6**

**5 AAC 84.270. Furbearer trapping.**

Lengthen river otter trapping seasons in Units 1 - 4 to align with Unit 5 as follows:

Extend and unify river otter seasons across Units 1 - 5 to November 10 - March 31

**What is the issue you would like the board to address and why?** Extend and unify river otter seasons across Units 1-5 to November 10 - March 31. This would be the same as Unit 9, which is at a similar latitude. Fur primeness is related to the amount of daylight, so having similar seasons for similar latitudes makes sense. River otters are not widely harvested in Units 1-5, so while an expansion of the season has the potential to deplete localized populations, the overall population will likely see no impact

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

**PROPOSED BY:** Nicholas Orr (EG-F22-102)  
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**PROPOSAL 7**

**5 AAC 84.270. Furbearer trapping.**

Extend marten trapping seasons to align with wolverine seasons in portions of Units 1 - 4 and 5 as follows:

Marten season would become November 10 – February 28 for the following areas: Units 1 - 3 (except Kuiu Island); Remainder of Unit 4, and Unit 5.

**What is the issue you would like the board to address and why?** Extend the marten season to line up with the wolverine season. This would allow marten bycatch in wolverine traps to be retained. It would also allow people who are out deer hunting to participate in marten trapping, as the early part of the season extension overlaps with the deer rut.

Fur primeness is related to daylight hours and is likely to be prime in the proposed extended season. British Columbia Regions 6 and 7 (which roughly line up latitude-wise with all of Southeast Alaska) have a season of November 1 – February 28, not unlike the proposed season in this proposal.

**PROPOSED BY:** Nicholas Orr (EG-F22-104)  
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**PROPOSAL 8**

**5 AAC 84.270. Furbearer trapping.**

Extend the marten trapping season in Units 1 and 2 as follows:

Marten trapping season:

<b>Units</b>	<b>Open Season</b>	<b>Bag Limit</b>
Units 1-2	Dec. 1 – Feb. 28	No Limit

**What is the issue you would like the board to address and why?** The Ketchikan Fish and Game Advisory Committee would like the board to address the marten trapping season for Units 1 and 2. The current season dates are December 1 – February 15. The Ketchikan AC would like the board to consider changing the end date to February 28.

We would like to see this change made for the following reasons. First of all, the fur is still prime, and the majority of marten trapping occurs along roads and beaches, therefore there is still plenty of un-trapped habitat for marten to breed in and remain undisturbed. Also, with fur prices down, trapping effort has gone down, which means less pressure and stress on the population. Lastly, wolf and wolverine trapping is still open, so it would be beneficial to trappers to be able to take advantage of as much opportunity as possible while out checking their trapline.

**PROPOSED BY:** Ketchikan Fish and Game Advisory Committee (EG-F22-110)  
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**PROPOSAL 9**

**5 AAC 84.270. Furbearer trapping.**

Extend the wolverine trapping season to March 15 in Units 1 - 5 as follows:

Area Units 1 - 5

Open wolverine trapping season November 10<sup>th</sup> – March 15<sup>th</sup>

**What is the issue you would like the board to address and why?** We would like to extend the wolverine season in Units 1-5 to gain back some trapping days lost during previous Board of Game meetings.

The 2007-08 meeting cycle changed the start date for hunting wolverine in Southeast AK from November 10<sup>th</sup> to September 1<sup>st</sup> (41 more days). The meeting cycle of 2009 – 2010, the mostly resident trapper lost 75-76 days at the end of the wolverine season in Southeast AK from April 30<sup>th</sup> to February 15<sup>th</sup>. The 2015-2016 meeting cycle the state gave back 13-14 days (February 28/29<sup>th</sup>). This return of days still has trappers short 60 days.

We have not heard of a female wolverine being caught in the month of April with milk or a bad pelt.

**PROPOSED BY:** Ketchikan Fish and Game Advisory Committee (HQ-F22-019)  
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# Sitka Area – Unit 4

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## PROPOSAL 10

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

Decrease the bag limit to four deer in Unit 4, Remainder as follows:

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

**What is the issue you would like the board to address and why?** Decreasing the bag limit would have minimal impact on most sport hunters while reestablishing a clearer priority for federally qualified subsistence hunters. Returning the bag limit to the historically more common four deer should reduce conflict between rural and urban hunters.

Background: In 2019, the Alaska Board of Game voted to increase the deer bag limit in Unit 4 from four to six deer, replacing a four deer bag limit that had been in place since 1992. While ADF&G data suggest the Unit 4 deer populations are healthy, and that there remain populations that satisfy what the Board of Game calls “amounts necessary for subsistence,” federally qualified hunters have noted that they are finding it more difficult to meet their subsistence needs. Title VIII of the Alaska National Interest Lands Conservation Act mandates that the Federal Subsistence Board ensure that “subsistence needs” are met. In the latest round of the Federal Subsistence Board process, federally qualified hunters have cited conflicts with non-federally qualified hunters, asking for broad closures of federal land to non-federally qualified hunters. To help avoid such drastic closures, advisory committees, advocacy groups, and individual Juneau hunters have volunteered to work with federally qualified hunters as well as the Federal Subsistence Board to reduce these conflicts and find compromises--this proposal represents part of that effort.

While reducing the bag limit will likely have minimal impact on the deer population or individual hunter harvests, it will encourage more conservative approaches while discouraging individuals from taking more than is needed, especially when deer populations are most vulnerable.

According to ADF&G data, from 1997-2019 the estimated average annual harvest in Unit 4 has been 5,725 deer. Harvest has remained fairly stable, with between 5,000-7,000 deer harvested annually. The exception being the severe winter of 2006/2007 when high harvest was followed by significant overwinter mortality of deer throughout Unit 4. This resulted in a precipitous decline in harvest from 7,900 deer in 2006 to 1,932 deer in 2007. Based on harvest and other indicators of deer abundance, managers believe the deer population had fully recovered by the 2013 season. Very few individual non-federally qualified hunters harvest a six deer limit in Unit 4; however, there are conditions when it is possible to take this many deer in a single day. These conditions typically coincide with deep snow, which forces the deer to the beach—that is, precisely when the deer are most vulnerable to overharvest and winterkill, as these data from the 2006/2007 winter suggest. Finally, as there is not much hunting effort in Unit 4 from hunters outside of Southeast Alaska, this change would impact almost exclusively residents of Juneau.

**PROPOSED BY:** Kevin Maier

(EG-F22-081)

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## **PROPOSAL 11**

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

Decrease the bag limit to four deer in Unit 4, Remainder as follows:

General Season

Unit 4, Remainder

Residents and Nonresidents

Bag limit: **four** deer total (see details in season dates below)

Season dates:

Bucks: August 1 – September 14

Any deer: September 15 – December 31

Hunt requires harvest ticket

**What is the issue you would like the board to address and why?** I would like to address concerns with deer hunting harvests across Unit 4 by reducing the bag limit for both residents and nonresidents to four deer in Unit 4 Remainder. Until the last Southeast Region meeting in Petersburg, the bag limit for deer in Unit 4 was set at four. This bag limit was broadly accepted across the region and has provided enough meat for individuals and families for years, even decades. The four deer bag limit also was successful through population declines due to bad winters in the mid-2000s'. Unit 4 is special because of the quality of habitat and the lack of natural predators. The four deer bag limit is a success in how stable it has been over the years and well the deer have done.

Having lived in Southeast Alaska for almost 70 years, I remember many years where hunting has not been as good as it has been recently. I also remember times when hunting was pretty good, like it has been for the past few years. I have watched the habitat change over the years both for the better and worse. I've lived and worked with generations of biologists and different Boards of Game, I was just a kid in the early days of statehood. Through most of it all, the four deer bag limit was successful in taking care of the deer population and keeping my family with enough opportunity to eat well.

The recent proposals to close deer hunting to folks in Juneau, Ketchikan and the rest of the world in large parts portions of Unit 4 sadden and trouble me deeply. How did we get here when we have a healthy deer population? There have been times when we had more hunters in the field than now. It used to be in the old days boats were slower and hunters hiked more. Maybe some of the "crowding" we see has to do with how focused hunters have become on hunting the beach instead of climbing up in the muskeg. What I do know is that a four deer limit worked for a long time and I'm sure it will work again.

A four deer limit in Unit 4 Remainder is sustainable in good years and bad years and that is what matters most. This proposal will take us back to a tried-and-true bag limit for deer in Unit 4. On the allocation side, I hope my friends and neighbors across the region can come together and share the country with each other like we always have done. Folks in Juneau and Ketchikan enjoy deer meat too and a lot of those folks have kids who are learning to hunt. Why is it that adults are working to cut the country up for themselves and cut out the kids? There are many folks in Juneau and Ketchikan that grew up in areas that might be closed by the feds. As far as subsistence goes, southeast Alaska has an abundance of fish and game to this day. I think four deer per hunter is a

good number when you factor in all the other animals we can harvest and the opportunities we have to use proxies for old-timers who can't hunt for themselves anymore. I never have been worried about "only" being able to take four deer when you factor in all of our opportunities.

Even if this proposal has no effect on the federal closures it is still important to consider. Four deer per person is a good number. A family of four hunters can take 16 deer per year with this limit, a nice amount of deer meat. If the feds decide to cut out Alaskans, well, then the only legal place to take deer will be below the tideline. All of this is a tragedy putting Alaskans against Alaskans when we have enough deer to go around. If there is an opportunity to pass this proposal and keep the lands open to hunting like they always have, I urge you to act. I also urge you to act if this proposal will help with the feds because there will be less country to hunt and a four deer limit worked for a long time.

**PROPOSED BY:** Paul Johnson (EG-F22-089)

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**PROPOSAL 12**

**5 AAC 92.510. Areas closed to hunting.**

Open the Mitchell Bay Closed Area in Unit 4 to brown bear hunting as follows:

It is proposed to open:

“Mitchell Bay Area: Kootznahoo Inlet, Kanalku Bay, Favorite Bay and all land within 660 feet of mean high tide within that area; area open to the taking of brown bears”.

**What is the issue you would like the board to address and why?** Open the Mitchell Bay Closed Area: Kootznahoo Inlet, Kanalku Bay, Favorite Bay and all land within 660 feet of mean high tide within that area; area currently closed to taking brown bears. We ask that the area be opened due to recent food security concerns brought forward by Angoon community members to the Federal Subsistence Board. The request to close Unit 4 Admiralty Island, west side to the taking of Sitka Black Tail deer by non-qualified subsistence users; reasons stated was the number and access to Sitka black-tailed deer.

It is known and accepted that brown bear prey on deer and fawns each year. Having a large area and complete bay complex immediately adjacent to and just north of the village and City of Angoon where brown bear hunting is closed could be a factor limiting deer numbers available for human harvest. This area also has a landfill that creates human/bear conflicts that could likely be reduced by opening the area around the village to hunting.

Unit 4 brown bear under the direction of ADF&G and the Brown Bear Management Strategy (BBMS) is very well managed at a 4% harvest level and has been under the harvest thresholds for over eight years. If there are private lands within this Controlled Use Area, access to that land should be controlled by the landowner and not the State of Alaska dictating the closed area. There is no biological reason that this area needs to be closed to the taking of brown bear

**PROPOSED BY:** Zach Decker (EG-F22-047)

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## **PROPOSAL 13**

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

Change the RB088 hunt boundary in Unit 4 to include Northeast Chichagof, and increase the allowable harvest for brown bear as follows:

Proposed Regulation:

(Outside drainages) Chichagof Island East Point (57.80'N 134.94 W) following the common Big Game Commercial Services Board Guide Use Area (GUA) line of 04-11 to 58.02'N 135.96 W to 57.96 N-136.09 W following GUA line 04-15 to including Yakobi and other adjacent islands; Baranof Island south and west of a line which follows the crest of the island from Nisemi Point (57°34' N. lat.,135°25' W. long), to the entrance of Gut Bay (56°44' N. lat.,134°38' W. long), including the drainages into Gut Bay, Kruzof Island, and other adjacent islands.

Allow ADF&G under the Brown Bear Management Strategy (BBMS) to increase allowable harvest in these areas and GUA 04-11, 04-16, 04-15 *up to* 15% on their discretion to help reduce brown bear/human conflict and therefore reduce Defense of Life or Property (DLP) loss.

**What is the issue you would like the board to address and why?** Change the RB088 open area to include Northeast Chichagof. This area that is commonly referred to by ADF&G and the USFWS land managers as Northeast Chichagof is inclusive of the City of Hoonah that includes such areas defined by the Big Game Commercial Services Boards as Guide Use Area (GUA) 04-11 and 04-16. Recent wildlife proposal 22-08 to the Federal Subsistence Board to reduce the bag limits of Sitka black-tailed-deer to non-federally qualified users to two bucks indicates local concern of food security for this area. Another Federal Subsistence Board proposal for the Pelican Area (GUA 04-15) to restrict non-local harvest of deer similar to proposal 22-08 has also been submitted over the concern of food security in the area.

Further, Defense of Life or Property (DLP) reports for the last ten years includes 42 brown bear DLP in the GUA 04-11 and GUA 04-16 area reported to Sitka ADF&G. These numbers seem to support the indication that a high number of bears reside in this area.

Year	Sitka	Hoonah NE Chichagof	Angoon
2012	0	3M, 2F	0
2013	1M	2M, 2F	0
2014	1M	1F	0
2015	0	0	0
2016	1M, 2F	2M, 2F	0
2017	3M	1M, 2F	1M
2018	2M, 3F	8M, 5F	1M
2019	1F	1M, 2F	3M
2020	3M	3M, 2F	2M
2021	5M, 8F	4M	0

The regulation for RB088 currently reads:

(Outside drainages) Chichagof Island south and west of a line which follows the crest of the island from Rock Point (58° N. lat., 136°21' W. long.), to Rodgers Point (57°35' N. lat., 135°33' W. long.) including Yakobi and other adjacent islands; Baranof Island south and west of a line which follows

the crest of the island from Nismeni Point (57°34' N. lat.,135°25' W. long), to the entrance of Gut Bay (56°44' N. lat.,134°38' W. long), including the drainages into Gut Bay, Kruzof Island, and other adjacent islands.

**Note:** The author submitted attachments with this proposal which are available on the Board of Game proposal book webpage at: [www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook](http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook) or by contacting the ADF&G Boards Support Section at (907) 465-4046.

**PROPOSED BY:** David Summers (HQ-F22-002)  
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**PROPOSAL 14**

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

Change the brown bear hunt area for RB088 in Unit 4 to include all of Lisianski Inlet drainage as follows:

Proposed regulation reads:

(Outside Drainages) From Point Lucan outside of the Port Althorp closed area following the Althorp Peninsula ridge common line of Guide Use Area 04-15 south and west of a line which follows the crest of the island including Yakobi and other adjacent islands to (57.82701, -135.86404) over to (57. 79173, -135.99264) south and west of a line which follows the crest of the island to Point (57°34' N. lat,135°25' W. long), to the entrance of Gut Bay (56°44' N. lat., 134°38' W. long), including the drainages into Gut Bay, Kruzof Island, and other adjacent islands.

**Note:** The author submitted maps with this proposal which are available on the Board of Game proposal book webpage at [www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook](http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook) or by contacting the ADF&G Boards Support Section at (907) 465-4046.

*See red line on the submitted map for illustration.*

**What is the issue you would like the board to address and why?** Change RB088 hunt boundary to follow the common Big Game Commercial Services Board border of Guide Use Area (GUA) 04-15. Opening all of Lisianski Inlet to remain open until May 31. Change in boundary line would allow user to better understand open and closed areas of hunt RB088. This change would align GUA 04-15 hunt area with RB088 regulation. Change in regulation would allow hunters to use both sides of the inlet making the regulation easier to understand.

Current regulation reads:

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

*See yellow line on the submitted map for illustration.*

**PROPOSED BY:** David Summers (HQ-F22-003)  
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# **Petersburg & Wrangell Area – Units 1B & 3**

## **PROPOSAL 15**

### **5 AAC 92.510(a)(5)(B) Areas closed to hunting.**

Change the description of the Petersburg Road System Closed Area as follows:

5 AAC 92.510(a)(5)

(B) in the Petersburg vicinity, 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** [THE CRYSTAL LAKE CAMPGROUND] is closed to the taking of big game, except wolves;

**What is the issue you would like the board to address and why?** The current description of the Petersburg Road System Closed Area is inaccurate. The southern most boundary of the closed area is described as the Crystal Lake campground. While the US Forest Service does maintain a public use facility at mile marker 17.22 of the Mitkof Highway, there is no campground present. Additionally, the name of the public use facility is not consistent and varies on currently available maps from “Blind Slough Campground” to “Bind Slough Picnic Area”.

To avoid confusion, the department proposes correcting the boundary description by replacing Crystal Lake campground with mile marker 17.22 of the Mitkof Highway.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F22-056)

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## **PROPOSAL 16**

### **5 AAC 85.030(a)(5). Hunting seasons and bag limits for deer.**

Lengthen the deer season in Unit 3, that portion of Mitkof Island within the Petersburg Management Area as follows:

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

(2) Unit 3, that portion of Mitkof Island within the Petersburg Management Area

2 bucks **Aug 1** [OCT 1] - Dec 15

**What is the issue you would like the board to address and why?** Currently the Petersburg Management Area’s deer season runs October 1 - December 15 with a limit of two bucks by bow and arrow only. There are no August/September deer opportunities on Mitkof Island and the Lindenberg Peninsula areas of Unit 3. These areas provide the easiest access to locals. Petersburg residents do have nearby August and September deer opportunities in Unit 1B. However, these hunts take a larger time commitment and are often weather dependent as one needs to cross a sizeable body of water with limited areas to safely store a watercraft. By opening the Petersburg Management Area’s deer season August 1 – December 15, it would allow an early season opportunity for bowhunters with limited time and resources and expand opportunity to an area that was created to minimize deer impacts near town.

**PROPOSED BY:** Kaleb Baird (EG-F22-105)

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**PROPOSAL 17**

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

Establish a fall drawing permit hunt for elk on Zarembo Island in Unit 3 as follows:

**Unit 3, Zarembo Island, October 1 - October 31, one bull elk by drawing permit only, up to 25 permits may be issued.**

**What is the issue you would like the board to address and why?** Establish a drawing hunt on Zarembo Island for elk. Zarembo has become an elk sanctuary with no allowable harvest. Zarembo Island deer population is a valuable food source for local communities and is being displaced by elk populations.

**PROPOSED BY:** Chris Guggenbickler and Jordan Bunes (EG-F22-053)

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**PROPOSAL 18**

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

Establish a fall, drawing permit hunt for elk on Zarembo, Bushy, Shrubby and Kashevarof Islands in Unit 3 as follows:

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

Unit 3, Zarembo, Bushy, Shrubby Islands, and the Kashevarof Islands **UP TO 5 permits will be issued, 1 bull by drawing permit only; Sept. 15 - Oct. 15** [No open season].

**What is the issue you would like the board to address and why?** That portion of Unit 3 that includes Zarembo, Bushy, Shrubby and the Kashevarof Islands is currently closed to elk hunting. Elk dispersed to the area following the Etolin Island introductions and were hunted previously, however numbers were deemed too low to sustain a hunt in 2008. Recently elk sightings and observations in the area have led some to believe the herd is indeed growing and capable of sustaining a limited opportunity bull-only hunt. A limited draw hunt allowing up to five bull permits would allow some opportunity to this resource that is otherwise off limits and in competition for food resources with native deer populations. While a number lower than five permits is the most likely starting place, allowing the department room to adjust up or down on a yearly basis as more is learned about the herd and hunter observations are taken into consideration will be vital to a successful herd and hunt.

Further, the earliest any-weapon season for elk in the state is currently September 25 in Unit 8. Nearby Etolin Island has a bow and arrow only season for elk during the month of September, but any weapon seasons are conducted in October and November. If a Zarembo, Bushy, Shrubby, and Kashevarof Islands season is adopted, there is interest for an earlier season structure including a significant portion of the month of September.

**PROPOSED BY:** Kaleb Baird (EG-F22-109)

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**PROPOSAL 19**

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

Change the hunt structure for elk on Etolin Island in Unit 3 as follows:

Make the following changes to the Etolin Island elk hunting seasons:

Shorten DE318:

DE318            September 1 - **15** [30]            25 tags            Archery Only

Create a new hunt DE319

**DE319**            **Sep. 16 - 30**            **25 tags**            **Residents Only**

Reduce the number of tags for DE321:

DE321            Oct. 1-15            40 tags

Eliminate DE32:

DE323            [OCT16 - 31            50 TAGS]

Start the registration hunt earlier:

RE325            **Nov. 1 - Dec. 1**

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

- The Etolin Island elk hunt consistently produces a low harvest.
- The resource is underutilized.
- The vast majority of hunting effort during the month-long archery season regularly occurs within the first two weeks of the season, leaving the latter half of the month largely un-hunted.
- The number of DE321 tags allotted annually creates crowding in the field, effectively diminishing the quality, productivity and safety of the hunt.
- The season dates of both DE323 and RE325 reduce the productivity of the hunts due to short days and typically inclement weather.

**PROPOSED BY:** Ketchikan Fish and Game Advisory Committee (HQ-F22-014)

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**PROPOSAL 20**

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

Split Etolin Island in Unit 3 into two hunt areas for elk as follows:

I would like to recommend Etolin Island be split into two hunt areas. The dividing line would extend from Anita Bay through Burnett Inlet. This would result in a hunt area south of Anita Bay and east of Burnett Inlet which currently attracts the vast majority of effort and harvest. The remainder of Etolin Island north of Anita Bay and West of Burnett Inlet would be a second area. There has been historic harvest in Steamer Bay, Rocky Bay, Three Way Passage and Mosman Inlet.

I would suggest that the archery and registration hunts remain the same, however, the October hunts would include the two new hunt areas. I would also recommend that the current up to maximum of 50 draw permits for DE321 and DE323 would be split with the new subunit to include DE322 and DE324. The split would be determined by the area management biologist.

My suggested split is referenced below.

Unit/Area

### **Hunt Area 1**

**Etolin Island area bounded by a line from Anita Bay to Zimovia Strait, running north to the intersection of Chichagof Passage, west along Chichagof passage to Stikine Strait to the intersection of Clarence Strait, south to Stan Hope Island, east to Fawn Island and north up through Burnett Inlet.**

**One bull by permit DE331, Oct 1st- Oct 15th, up to 10 permits**

**One bull by permit DE 333, Oct 15th-Oct31st, up to 10 permits**

### **Hunt Area 2**

**Etolin Island area bounded by a line from the intersection of Clarence Strait and Ernest Sound, a line running northeast excluding Niblack Islands to the intersection of Zimovia Strait, north to Anita Bay. From Anita Bay south to Burnett Inlet, east of Fawn Island, west to Stan Hope Island, extending to the intersection of Clarence Strait southeast to the intersection of Clarence Strait and Ernest Sound.**

**One bull by permit DE321, Oct 1st – Oct 15th, up to 40 permits**

**One bull by permit DE 323, Oct 16th – Oct 31st, up to 40 permits**

**What is the issue you would like the board to address and why?** The current October hunt structure and level of participation, particularly from Alaska residents and more specifically from southeast Alaska residents is causing congestion, burdensome competition, a loss of hunt aesthetics, resulting in potentially dangerous situations. I would recommend a change in hunt structure to help alleviate these issues.

The vast majority of effort is isolated to the southern end of Etolin Island from Canoe Pass to McHenry Inlet and the mountain peaks and drainages from Mount Shakes, Navy Peak, McHenry Lake and Mt. Etolin. It isn't uncommon to have multiple hunting parties pursuing elk in the same bowl, drainage, beach, inlet or mountain range.

Effort is focused in these areas because of historic harvest and access. In the mid 2000's an average of seven to eight elk were harvested per year by about 50 hunters. In the last several years the harvest rate has been similar but with around 75 hunters participating. The majority of the hunters are hunting in October and with the condensed two week draw seasons crowding is often the result.

Management of this small, isolated elk herd is largely done through harvest data due to the significant difficulty in estimating the population due to the thick old growth habitat and forested

drainages of south Etolin. Due to fiscal constraints, weather, time, distance and habitat, it is exceedingly difficult to accurately estimate elk on Etolin.

By splitting Etolin into two hunt areas and dividing the available up to draw permits I believe it will spread out effort (improve aesthetics, limit conflicts), lead to other viable hunt options (increased opportunity) and provide the Department of Fish and Game with valuable information to better manage the herd I would request the Board consider the following changes to the existing hunt structure to reduce crowding, potential conflict and to restore the aesthetics of the hunt.

**PROPOSED BY:** Matt Allen (HQ-F22-015)

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**PROPOSAL 21**

**5 AAC 92.150. 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 as follows:

**5 AAC 92.150. Evidence of sex and identity(a)** Horns of a Dall sheep must be salvaged. (b) If the taking of a big game animal, except sheep, is restricted to one sex, a person may not possess or transport the carcass of an animal unless sufficient portions of the external sex organs remain attached to indicate conclusively the sex of the animal, except that antlers are considered proof of sex for a deer if the antlers are naturally attached to an entire carcass, with or without the viscera; however, this section does not apply to the carcass of a big game animal that has been cut and placed in storage or otherwise prepared for consumption upon arrival at the location where it is to be consumed. (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.] (d) In those areas where sealing is required, until the hide has been sealed by a representative of the department, no person may possess or transport the hide of a bear that does not have the penis sheath or vaginal orifice naturally attached to indicate conclusively the sex of the bear. (e) In those areas where sealing is required only for the skull of a bear, a person who possesses or transports the meat of a bear must keep sufficient portions of the external sex organs naturally attached to indicate conclusively the sex of the bear until the skull of the bear has been sealed by a representative of the department.

**What is the issue you would like the board to address and why?** Remove language [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.] from 5 AAC 92.150 to align spike-fork definition with the rest of the state.

**PROPOSED BY:** Chris Guggenbickler and Jordan Bunes (EG-F22-052)

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*Note: Proposal 22 is a combination of seven submissions all requesting elimination of the restriction for using motorized vehicles for the RM038 moose hunt in Unit 1B.*

**PROPOSAL 22**

**5 AAC 92.052. Discretionary permit hunt conditions and procedures.**

Eliminate the restriction for using motorized vehicles for the RM038 moose hunt in Unit 1B as follows:

Delete this special condition completely, as it is no longer necessary.

**What is the issue you would like the board to address and why?** Concerning RM038, there is a special condition. "Hunting with the use of a motorized land vehicle is prohibited in Unit 1B, except to retrieve moose, establish camps, or check boats."

This "rule" was added in 1978, when the area was logged. "Road" hunting afforded easy access to the moose moving into the area. The area has since grown back, providing a lot of cover for the moose, and "road" hunting no longer would provide such easy access to moose.

The area allows for the use of motorized land vehicles for hunting of all other game species. So you may drive a vehicle in this area to hunt deer during moose season.

**PROPOSED BY:** Kris Thynes

(EG-F22-077)

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I recommend that the current no motorized land vehicle hunt stipulation in Unit 1B be discarded. There is absolutely no scientific reason behind the regulation and there is no reason why we shouldn't be allowed to moose hunt the exact same way as everywhere else in the state. Being as this is currently a unique hunt condition, I don't think anything even needs to be worded, just get rid of it and state in the new books that Unit 1B is now open to hunting by any legal means as any other unit.

**What is the issue you would like the board to address and why?** Special condition for general moose hunt in Unit 1B, the prohibition of motorized land vehicles for hunting, except for getting to camp, checking boat, and retrieving a moose once harvested. This regulation is out of date and makes it unfair for certain hunters. Currently there are several moose camps at various pull-offs on the logging roads in the area. Only one of the camps is owned by a resident of Point Agassiz. Frankly the rest of us can't afford to buy campers and move them up the road so we can hunt on foot or on bicycle. I am a resident of Point Agassiz and I am a disabled Veteran. I have a messed up neck, two bad shoulders, a messed up back and cannot ride a bike, or hike far enough up the valley to hunt moose. I spent ten years in the interior where I harvested a moose every year on the remote lake I lived on. Here in Unit 1B I don't have a chance because I can't ride an ATV up the road system to hunt, or my truck. This is the only place in the state where you can't use an ATV or truck. Frankly it is dangerous for me to try to hunt as I can't carry weight on my back because of my disability so I can't carry survival gear.

The area biologist just explained at the last board meeting that this stipulation was created because of a group of drunk driving, night shooting hunters in the 80s' that is a non-issue out here now. Now most the cabin owners and moose hunters are elderly, and they should have just as much of chance to hunt as anyone in the rest of the state. For all those who don't have a moose camper, we can't get to an area of moose, on foot or bike from our residence without hiking or biking all day. How would we be able to turn around and get all the way home to grab a truck or ATV and a winch to safely recover our moose if we could manage to harvest one? That would be wanton waste!!

**PROPOSED BY:** Cody Ledoux

(EG-F22-083)

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The solution would be to allow hunters to use motorized vehicles in regards to hunting moose.

**What is the issue you would like the board to address and why?** The hunt condition regarding moose hunting in Unit 1B saying we can't use motorized vehicles to hunt. It's an out-of-date condition based on events that occurred between individuals decades ago. The scenarios that brought about this hunting condition are obsolete and currently only cause difficulty due to territory hoarding among current hunters, and the inability to travel to better hunting grounds without an established and maintained camp. I am requesting this hunt condition be removed.

**PROPOSED BY:** Faith Nelson

(EG-F22-085)

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The solution is to eliminate the "special conditions" for the Unit 1B's moose hunt. I propose no new regulations regarding the game Unit 1B

**What is the issue you would like the board to address and why?** The issue is the "special condition" rule prohibiting the use of motorized land vehicles in all of game Unit 1B. I would like the board to eliminate this "special condition" rule for the Unit 1B moose hunt. As a long time moose hunter in game Unit 1B. I find this "special condition" rule in a non-controlled use area a rule that serves no purpose other than to limit access for hunters. The fact that this is the only game unit in Southeast Alaska that has this "special condition" makes no sense. In order for me to hunt from my cabin I have to either walk or use a bicycle and travel many miles on a logging road to access the spots I choose to hunt. I can drive my truck on these roads and hunt any other animal in season, but a moose is ruled illegal.

**PROPOSED BY:** Mark Hofstad

(EG-F22-090)

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Legalize the use of motorized vehicles to hunt moose in Unit 1B.

**What is the issue you would like the board to address and why?** I would like to address the no driving of motorized vehicles while hunting moose on the Thomas Bay road system in Unit 1B. The point of it, years ago, was because of it's a small area and lots of hunters used to go there.

However, the habitat has changed the days of driving and hunting. The clear cuts are over, the habitat has grown up, and very few hunters go there anymore because hunting isn't as good as it used be with the lack of moose habitat. Yet jet boats are allowed to drive and hunt the rivers in the same area while road access isn't allowed. Use of vehicles to hunt moose would be beneficial for the residents that live there, as well as anyone else hunting Unit 1B

**PROPOSED BY:** Austin Sollars

(EG-F22-099)

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I recommend deleting the hunt condition, special stipulation that prohibits the use of motorized land vehicles in Unit 1B. There is no scientific reason behind it and it is an unfair rule. There doesn't need to be a new regulation, just make it the same as every other place in the state.

**What is the issue you would like the board to address and why?** There is currently a hunt condition for moose hunting in Unit 1B that doesn't allow land-based motor vehicles for hunting. This is the only place in the state that has this stipulation, and it is ridiculous. This is in Southeast Alaska, in a rainforest where people can die from hypothermia in a day. To not be able to provide enough meat for our family, due to the risks of not being able to carry proper survival gear is just plain stupid. I have lived in Unit 1B, remotely since 2003. I have never been able to moose hunt because the moose live 5 miles from my home, and I have a bad back so I cannot ride a bicycle. We should have the same rights as everyone else in the state.

**PROPOSED BY:** Steve Nelson

(EG-F22-106)

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I recommend that the restrictions on motorized land vehicles, for moose hunting in Unit 1B, be lifted to allow everyone a fair chance at harvesting a moose.

**What is the issue you would like the board to address and why?** Hello, My name is Sidney Nelson. My family lives, off-grid, out at Point Agassiz in Unit 1B. We live on the coast. There is currently a special rule, that only applies to Unit 1B that states you cannot use a motorized land vehicle for moose hunting, until after you shoot the moose. This is an unfair law to anyone who isn't either young and in shape (who can either hike or bike 10 miles to shoot a moose and then back to get a vehicle in time to salvage it before it spoils) or for the 6 or 8 people who are fortunate enough to have a moose camp set up. As anyone who lives out here knows, there are only so many places for a moose camp, those spots have been in use by the same people for dozens of years. There was no new places for our boys to hunt when we moved here in 2003 and there still isn't. The only option would be to hunt with ATVs which should be allowed. We are low income and cannot afford a riverboat, but we do own ATVs. Everywhere else in Alaska you are allowed to hunt using an ATV, here should be no different. Some people are talking about suggesting using e-bikes, that would only allow the rich who can afford a \$1500-\$3000 bike to have another advantage over us. We just want a fair chance to provide for our families.

**PROPOSED BY:** Sidney Nelson

(EG-F22-108)

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**PROPOSAL 23**

**5 AAC 92.085. Unlawful methods for taking big game.**

Allow the use of electric bikes for the RM038 moose hunt in Unit 1B as follows:

**"The use of "E-bikes" with 750 watts or less are permitted for hunting."**

**What is the issue you would like the board to address and why?** Concerning RM038, there is a special condition. "Hunting with the use of a motorized land vehicle is prohibited in Unit 1B, except to retrieve moose, establish camps or check boats."

I would like to allow the use of "E-bikes" in this area . "E-bikes" below 750 watts are considered in many areas of the state and federally to be non-motorized vehicles.

This was presented to the local advisory committee at a public meeting on April 25, 2022 and after discussion the committee voted 7 Yeas, 1 Nay and 3 members abstained.

**PROPOSED BY:** Kris Thynes (EG-F22-075)

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**PROPOSAL 24**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**

**5 AAC 92.510. Areas closed to hunting.**

Open the Petersburg Creek drainage of Kupreanof Island in Unit 3 to black bear hunting as follows:

5 AAC 92.510(a)(5)(C)

That portion of Kupreanof Island that includes the Petersburg Creek drainages is closed to black bear hunting **except that: black bears may be taken by resident certified bowhunters who obtain a limited registration permit**

5 AAC 85.015

Kupreanof Island RESIDENT HUNTERS: **Petersburg Creek drainage, one bear by bow and arrow only, April 15 - June 30, UP TO 10 permits will be issued on a first come first serve basis at Petersburg ADF&G office, limit one bear per hunter**

**What is the issue you would like the board to address and why?** Currently the Petersburg Creek drainage of Kupreanof Island is closed to the taking of black bears. Hunters and anglers are allowed to participate in all other forms of recreation in the area. This includes opportunities for moose, deer, wolves, waterfowl, and various fish species, though black bears remain protected. There is some desire from local bear hunters to access this area due to proximity of town and the seemingly high population. A limited access and weapon restricted hunt could provide the necessary opportunity to harvest some bears with minimal interference of and considerations towards other common user groups in the area (sport fishing, fall bear watching, sightseeing, etc.) A spring-only season for certified bowhunters with a limited number of permits (only available at the Petersburg ADF&G office) would allow for a unique opportunity to hunt bears and keep hunter interactions with other user groups at a minimum.

**PROPOSED BY:** Kaleb Baird (EG-F22-107)

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**PROPOSAL 25**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**

**5 AAC 92.510. Areas closed to hunting.**

Allow black bear hunting in the Petersburg Creek Drainage area, with season dates to align with Unit 3 as follows:

I would like it to say you can kill black bear in the Petersburg Creek drainage with the season matching the rest of Unit 3.

**What is the issue you would like the board to address and why?** I would like to allow hunting of black bear in the Petersburg Creek drainage.

**PROPOSED BY:** Max Worhatch

(EG-F22-142)

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**PROPOSAL 26**

**5 AAC 85.015. Hunting seasons and bag limits for black bear**

Reduce the permit allocation and bag limit for nonresident, nonguided black bear hunters on Kuiu and Kupreanof Islands in Unit 3 as follows:

DL029 - DL030

Nonresident hunters NOT using a registered guide, not accompanied by resident second-degree of kindred. Reduce nonresident, non-guided draw allocation from 75 to 35 annually.

Nonresident hunter NOT using a registered guide, not accompanied by a resident second-degree of kindred. One black bear every four (or set by Board of Game) regulatory years.

**What is the issue you would like the board to address and why?** Reduce nonresident, non-guided draw from 75 to 35 annually due biological concerns for the black bear population on Kuiu and Kupreanof Island. As well as crowding, interactions and 'conflicts' in the field. Over the last 20 years, there has been a marked, steady, dramatic decline of population and age of bears on the island. Increased harvest and the lack of any substantive population study for the bear population is causing harm to the long-term viability of the island resource. The last population study regarding the black bear resource on Kuiu island was done in the early 2000s by a graduate student. The study, while possibly effective in the areas that it covered, was extrapolated over the entire island that most certainly does not provide equal quality habitat for bears, providing false data that has been relied on for harvest management by ADF&G. Habitat alteration, prolonged high harvest, and wolf predation have caused substantial reductions in the population that have not been addressed or even acknowledged by the managing agency.

At the last southeast Board of Game meeting ADF&G increased available draw limit from 50 to 75 with no new study of bear population. DL029 - DL030 has an extremely high field participation rate. Kuiu has around 18 huntable bays on the island. Kupreanof has six huntable bays. These islands also have around 14 guide outfitters with US Forest Service hunt permit allocation that vary in location of hunts. Over the years hunt draw application service companies and booking agents have been providing hunt services from maps, gear list and local service providers assisting



in the hunt from outside of State of Alaska. Some application service company has been known to accompany their draw application clients successful in the draw on the hunt acting in the capacity of a "Hunt Advisor". This has increased hunters' interest and success in these areas in providing logistical service.

**PROPOSED BY:** Todd Boughner (HQ-F22-001)  
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**PROPOSAL 27**

**5 AAC 92.550. Areas closed to trapping.**

Require 100-yard trapping setbacks along hiking trails and drivable surfaces on Wrangell Island in Unit 3 as follows:

I recommend that a 100-yard no-trapping buffer be implemented around all established hiking trails and drivable surfaces on Wrangell Island.

**What is the issue you would like the board to address and why?** Trapping along highly trafficked roads on Wrangell Island has led to many user conflicts. Implementing a road setback would resolve these conflicts with minimal disturbance to trappers.

**PROPOSED BY:** Tyler Riberio (EG-F22-136)  
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# **Juneau, Haines, Skagway & Yakutat Areas – Units 1C, 1D & 5**

## **PROPOSAL 28**

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

Change the hunt boundary from Little Sheep Creek to Sheep Creek, for the RG014 goat hunt in Unit 1C as follows:

Unit 1C, that mainland portion draining into the south bank of Sheep Creek, Gastineau Channel south of Sheep Creek, Stephens Passage, and Taku Inlet between the mouth of Sheep Creek and Taku Glacier including the south side of Blackerby Ridge encompassed by a line from Observation Peak west along the ridgeline down to the 1,000-foot contour, east along that contour to the north shore of Salmon Creek Reservoir, north of the main drainage into the head of the reservoir following that drainage south and east up to the ridgeline and east to Olds Mountain.

**What is the issue you would like the board to address and why?** Change the boundary line from Little Sheep Creek to Sheep Creek for RG014. Current boundary lines for RG014 (archery only goat hunt) are confusing. The current boundary on the southeast end of the hunt area is Little Sheep Creek. But the upper watershed of Little Sheep Creek is a maze of tributaries and it is impossible to tell if you are in the legal hunt area when in the field. Changing the boundary line to the much larger watershed of Sheep Creek will connect with the existing boundary in a more logical way that matches terrain and will make navigation easier.

Changing the boundary line from Little Sheep Creek to Sheep Creek would marginally increase the size of legal hunt area but would be much less confusing for hunters to stay within the legal boundary. This change is unlikely to substantially increase mountain goat harvest as this change only includes a small amount of additional mountain goat habitat.

**PROPOSED BY:** Peter Robertson (EG-F22-088)  
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## **PROPOSAL 29**

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

Expand the hunt area of the RG014 archery goat hunt in Unit 1C as follows:

I recommend that the hunt area be expanded:

The most preferable expansion of RG014 would be to include the north side of Blackerby Ridge and the entirety of Thunder Mountain/Heintzelmann Ridge. This hunt area includes the area of Thunder Mountain/Heintzelmann Ridge and reduces potential conflicts with goat viewing opportunities associated with the Mendenhall Glacier Recreation Area by limiting the hunt to over the 2000-ft contour. The hunt area would read:

"that mainland portion draining into the south bank of Little Sheep Creek, Gastineau Channel south of Little Sheep Creek, Stephens Passage, and Taku Inlet between the mouth of Little Sheep Creek and Taku Glacier including Blackerby Ridge, portions of Thunder Mountain, and Heintzelmann Ridge encompassed by a line from Nugget Mountain northwest to the 2000-ft contour, along that contour around Thunder Mountain/Heintzelmann Ridge and Blackerby Ridge to the northern shore

of the Salmon Creek Reservoir, then following the north shore of the Salmon Creek Reservoir to the main drainage at the head of the reservoir following that drainage south and east up the ridgeline and east to Olds Mountain, then following a line back to Nugget Mountain."

**What is the issue you would like the board to address and why?** RG014 has been a successful example of small population management for goats in areas of higher population in Southeast Alaska. The current hunt area, which is generally limited to the south face of Blackerby Ridge in Juneau, is unnecessarily restrictive for hunters. The area is generally used by hikers which further limits hunter success. In order to reduce the number of user conflicts, I propose that the hunt area under RG014 be expanded.

**PROPOSED BY:** Tyler Riberio (EG-F22-122)  
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**PROPOSAL 30**

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

Open a fall archery goat hunt in Unit 1C, the southern end of the Chilkat Peninsula as follows:

Unit 1C Chilkat Peninsula south of south end of Sullivan Island.

Bow only

RG--- August 1 - September 1

**What is the issue you would like the board to address and why?** The southern end of Chilkat Peninsula in Unit 1C season starts September 1. This is when storms typical start and weather plays a huge role in safety and success of a hunt. Most of the bays in the area have little to no protection from wind and seas.

**PROPOSED BY:** Jonathan Geary (EG-F22-073)  
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**PROPOSAL 31**

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

Lengthen the resident, registration goat hunt in Unit 1C, the Southern end of the Chilkat Range as follows:

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

Residents Only – one goat by registration permit

RG XXX Aug. 1 – Nov. 30

**What is the issue you would like the board to address and why?** Later season for goat in the southern Chilkat Range area of Unit 1C.

The resident goat season for the northern area of the Chilkat Range in Unit 1C is by registration permit and starts on August 1st but the resident goat season for the southern area of the Chilkat

Range doesn't start until September 1st, which is when storms frequent the area, making access from the coast and hunting much more difficult.

According to ADF&G information, over the past five years there were three - nine goats harvested off of the entire Chilkat Peninsula, with very few nannies taken. Goats have increased on the Chilkat Peninsula from the lows of the past and the current harvest quota is not being met, so we see no reason to continue the later season opener for the southern part of the Chilkat Range.

Concerns over the taking of nannies are still present, and the goat "points" method of decreasing the quota when nannies are taken is still in place. We also recommend imposing a requirement that all goat hunters in Unit 1C must watch and pass the ADF&G goat gender identification quiz: <http://www.adfg.alaska.gov/index.cfm?adfg=quiz.mountaingoatquiz>

**PROPOSED BY:** Resident Hunters of Alaska (HQ-F22-021)

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### **PROPOSAL 32**

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

Restrict hunters who take nanny goat in Unit 1D from hunting goat the following regulatory year in Unit 1D as follows:

The committee would like this regulation to be changed to read the following: **"If a nanny is taken in subunit 1D, the hunter is prohibited from hunting any goats in subunit 1D the following regulatory year."**

**What is the issue you would like the board to address and why?** In Unit 1, the regulations currently read, **"the taking of nannies with kids is prohibited. Taking of males is encouraged."**

There are 22 hunt areas in Unit 1D. Of those 22 subunits, nine of them are one to two point units and three units as of 2021 were closed to goat hunting entirely. These are fragile populations of ungulates. While we do have a huntable population amongst some of the subunits, nearly half of the areas with populations are teetering on the huntable/emergency closure line. Nannies not accompanying a kid can be harvested. The committee wants to see this stopped.

Numbers show that in Unit 1D, people are hunting any goat and not targeting billies. For example, preliminary ADF&G data indicates that 40% of females harvested were done so knowingly, and not a result of misidentification. These numbers have all been extracted from Alaska Department of Fish and Game's harvest data (available publicly on their website). They have shown that in Unit 1D from 2010-2020, 30% (86/284) of harvested goats were nannies. To expand on that, in 2016, 13 of the 28 goats harvested were nannies. That's 46%.

For example, if 50 harvest points were allowed in Unit 1D and 46% of the harvest was females only 35 mtn goats (19M: 16F) could be harvested before the quota was met. However, if all harvest was males then a total of 50 mountain goats could be harvested (50M: 0F). Thus, in this real-world scenario, harvest opportunity could be increased by 15 mountain goats (46%) if only males were harvested!

**PROPOSED BY:** Upper Lynn Canal Fish and Game Advisory Committee (EG-F22-040)

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**PROPOSAL 33**

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

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

Unit 1C Chilkat Range mainland north of point Couverden and south of south end of Sullivan Island.

One brown bear, every year by registration permit. Residents Only

RB --- September 15 - December 31

RB--- March 15 - May 31

**What is the issue you would like the board to address and why?** Over the past 25 plus years I've been hunting and fishing in Unit 1C, I've noticed how brown bears are taking over. You can pull into any one bay where you used to see black bear, moose, and deer, now you see 13 brown bear. I see this as a huge issue. We need to manage this area the same as Berners Bay where you can harvest one brown bear every year to help bring back moose, deer, and black bear.

**PROPOSED BY:** Jonathan Geary (EG-F22-072)  
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**PROPOSAL 34**

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

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

Unit 1C Chilkat Peninsula mainland north of Point Couverden and south of Sullivan Island:

Residents Only – one brown bear every year by registration permit.

RB XXX Sept 15 – Dec 31

RB XXX Mar 15 – May 31

**What is the issue you would like the board to address and why?** Berner’s Bay area of Unit 1C is one brown bear every regulatory year for residents by registration permit but the remainder of Unit 1C including the Chilkat Peninsula is one bear every four years for residents.

There has been an increase of brown bears on the mainland area of the Chilkat Peninsula in Unit 1C, with increased deer predation that has also led to black bears moving into the more upland areas away from the coast, making black bear harvests more difficult. Brown bears are abundant on the mainland Chilkat Peninsula area of Unit 1C and we see no need to manage this area

differently than the Berner's Bay area of Unit 1C, and no need to manage that area according to Unit 4 brown bear management plans.

The Department of Fish and Game can monitor an increase in brown bear harvests should this proposal pass, and if any conservation concerns come to light there are avenues to decrease harvests via a harvest quota and reporting requirements.

**PROPOSED BY:** Resident Hunters of Alaska (HQ-F22-020)  
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**PROPOSAL 35**

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

Extend the bear baiting season for Unit 1D as follows:

The new season date for baiting black bears in Unit 1D would read:

"Areas Open for Bear Baiting: Unit 1D

Dates: Apr 15 - **June 30** "

**What is the issue you would like the board to address and why?** I would like to see a longer black bear baiting season in Unit 1D. The black bear season currently only runs another 15 days past the end of the current baiting season. So that we may provide more continuity and less confusion within the regulations, I would like to see the baiting season end the same day as the regulatory black bear hunting season (**June 30**). More fluid and consistent dates make abiding by the law not only easier but also creates a two-week longer window of opportunity for hunters.

Currently, the regulations on page 27 in the 2021-2022 regulations book read:

" Areas Open for Bear Baiting: Unit 1D

Dates: Apr 15 - **June 15** "

\*\*If for management/enforcement reasons, it would be easier to blanket all of Unit 1 instead of just picking the subunit of Unit 1D specifically, I am not opposed to all of Unit 1 bear baiting dates changing. I am however specifically requesting Unit 1D.\*\*

**PROPOSED BY:** Adam Smith (EG-F22-004)  
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**PROPOSAL 36**

**5 AAC 85.065. Hunting seasons and bag limits for small game.**

Reduce the bag limit for grouse for drainages that cross the Juneau-Douglas Road system in Unit 1C as follows:

Reduce the grouse bag limit to three per day for the drainages that cross the Juneau-Douglas Road System.

**What is the issue you would like the board to address and why?** Increased hunting pressure has lead to localized population declines in the sooty grouse. There are multiple reasons for the increased hunting pressure: 1) Advances in outdoor recreation technology has resulted in more capable snow-machines that are able to traverse steeper terrain giving more access to grouse habitat. Similarly, the increased popularity of backcountry skiing has increased the number of users who can access grouse terrain that previously would have remained inaccessible until the snows melted. 2) Hunting shows and social media have highlighting this fun and unique species, and there has been a desire to introduce non-hunters to the sport of hunting with classes and workshops highlighting spring grouse. 3) Declines in the Chinook population has limited the early fishing season opportunities. Chinook fishing frequently doesn't begin until after spring grouse season has closed. Those seeking a spring activity have shifted to grouse hunting. While the population of sooty grouse is stable across southeast Alaska, areas with high hunting pressure are often reduced to only the most inaccessible birds hooting from perilous cliffs.

Sooty grouse is one of the best species to introduce beginners to the sport of hunting. Decreasing the daily bag limit in the most accessible and heavily used areas will help spread out the harvest of grouse between more hunters and will keep more grouse in the areas that beginner hunters are likely to use when introduced to the sport.

**PROPOSED BY:** Peter Robertson (EG-F22-086)  
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**PROPOSAL 37**

**5 AAC 85.065. Hunting seasons and bag limits for small game.**

Reduce the bag limit for ptarmigan for drainages that cross the Juneau Douglas Road system in Unit 1C as follows:

Reduce ptarmigan bag limit to five per day for the drainages that cross the Juneau-Douglas Road System.

**What is the issue you would like the board to address and why?** Increased hunting pressure and lack of population monitoring has caused population declines in ptarmigan in areas with high use. Advances in outdoor recreation technology has resulted in more capable snow-machines that are able to traverse steeper terrain giving more access to ptarmigan habitat. Similarly, the increased popularity of backcountry skiing has increased the number of users who can access ptarmigan terrain that previously would have remained inaccessible until the snows melted.

Further, the current regulation of 20 birds per day gives the illusion that the species is extremely bountiful. Hunters who come upon a flock of birds are unconcerned, and may attempt to take the entire covey because the daily limit is so high. Finally, ADF&G doesn't monitor local populations of ptarmigan or reduce bag limits when weather conditions means brood survival is low and when hunting pressure would be the most detrimental.

**PROPOSED BY:** Peter Robertson (EG-F22-087)  
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**PROPOSAL 38**

**5 AAC 92.520(a). Closures and restrictions in state game refuges.**

Amend the youth hunt for Unit 1C Mendenhall Wetland State Game Refuge as follows:

*“The first two days of the established waterfowl season is open to **youth hunters 17 years old or younger accompanied by a licensed hunter 21 years old or older**, and both the child and accompanying adult must register with the department.”*

**What is the issue you would like the board to address and why?** The current regulation states that youth hunters must be between ages 10 and 17. I believe this is not necessary and it needlessly excludes many young people from participating in the hunt with their parents or guardians. If a parent or guardian believes a child under 10 is capable of safely hunting under their supervision, there is no need to impose a minimum age. The permit registration requirements for child and adult would remain. The responsible adult must have their hunter's education and refuge permit, so they have passed two tests that cover responsible behavior statewide and locally on the Mendenhall Refuge and they are capable of supervising a child during the youth hunt.

**PROPOSED BY:** Erich Schaal (EG-F22-111)  
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**PROPOSAL 39**

**5 AAC 92.520(a). Closures and restrictions in state game refuges.**

Amend the hunter education requirement for the Unit 1C Mendenhall Wetland State Game Refuge as follows:

*“a hunter for waterfowl on the Mendenhall State Game Refuge must have successfully completed a certified hunter education course, except a hunter who is **under 13 years of age** must be accompanied by an adult, or must have successfully completed a certified hunter education course; before hunting in the refuge,”...*

**What is the issue you would like the board to address and why?** This proposal will address an inadvertent hole in the current rules for youth who want to hunt on the refuge and it will increase a young person’s access to learning about the outdoors and responsible waterfowl hunting. The state provides an exceptional hunters education program through the Juneau School District to all Juneau students in 6th grade. Many young people have parents or other adults in their lives who already hunt on the refuge and they have accompanied these adults since they were very little. Under the current regulations, a 9-year-old can hunt with an adult but when they turn 10, they must be ready to pass the hunters safety course to continue to hunt. This restriction makes no sense, so it’s important to move the hunter education requirements from 10 to 13 because it allows youth to continue to hunt with the responsible adults in their lives and take the hunters education course with their classmates in 6th grade.



As an example, a typical 6th grader will turn 12 during that school year (September 1st through August 30th). By choosing age 13 as the requirement, it means that a youth who turns 12 on September 2nd is not excluded from hunting that coming waterfowl season because they have not taken the hunters education class yet. In speaking with the Juneau School District, the course usually takes place in the spring, therefore 13 is the logical age to correct this issue.

As national organizations like Delta Waterfowl, Ducks Unlimited, and US Fish and Wildlife Service have found, waterfowl hunter numbers in the US have been on a steady decline for the last several decades (see especially <https://deltawaterfowl.org/wpcontent/uploads/2017/03/LoomingCrisis.pdf>). Important efforts are in place to recruit underrepresented groups like women (Becoming an Outdoors Woman) and youth (hunter education courses), and there are efforts to engage with lapsed and new adult hunters, too, but these educational opportunities are not always met with adequate youth-friendly hunting opportunities. Equal access to the Mendenhall Refuge for all youth is very important. This slight adjustment to the regulations will fix this issue.

**PROPOSED BY:** Erich Schaal (EG-F22-113)  
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**PROPOSAL 40**

**5 AAC 92.520(a). Closures and restrictions in state game refuges.**

Allow the take of deleterious exotic wildlife in the Mendenhall Wetlands State Game Refuge as follows:

Amend the closures and restrictions section to the following:

*“(a) Unit 1: The Mendenhall Wetlands State Game Refuge, as described in AS 16.20.034, is closed to hunting, except for waterfowl including snipe and crane during established seasons, **and deleterious exotic wildlife, as defined in 5 AAC 92.990, there is no closed season, except by approved methods for taking migratory game birds or air rifles with nontoxic pellets must be used;** a person may not use any off-road or all-terrain vehicle, motorcycle, or other motorized vehicle, except a boat within the refuge; a hunter for waterfowl **or deleterious exotic wildfire** on the Mendenhall State Game Refuge must have successfully completed a certified hunter education course, except a hunter who is under 10 years of age must be accompanied by an adult, or must have successfully completed a certified hunter education course; before hunting in the refuge, **except for deleterious exotic wildlife,** a person must register for a permit annually with the department and demonstrate an understanding of informational materials provided at the time of registration; the permit is valid for all or specific waterfowl hunting zones **and deleterious exotic wildlife** within the Mendenhall Wetlands State Game Refuge, subject to closure at the discretion of the department; a person convicted of a hunting violation within the Mendenhall Wetlands State Game Refuge is not eligible to register for a permit to hunt in the refuge the following year; a hunter on the refuge shall present in the field, upon request, proof of registration; the first two days of the established waterfowl season is open to youth hunters ages 10 to 17 only, and both the child and accompanying adult must register with the department.”*

**What is the issue you would like the board to address and why?** Deleterious exotic wildlife are a serious ecological issue across our nation and the world. These species are almost as destructive as man’s effects on the environment. When the Mendenhall Refuge was created in the early 1990s’, it wasn’t contemplated that Juneau would be impacted by deleterious exotic wildlife

(DEW) and specific protections were not written into the founding documents. I believe this was an honest oversight, but it needs to be corrected. Since then, several deleterious species have arrived in Juneau, specifically the European Starling. While waterfowl hunting, I routinely see flocks of these invaders. Under the current refuge regulations, Starlings may not be legally taken, even during waterfowl season. Other Alaskan refuges have properly allowed for the removal of deleterious exotic wildlife, so the Mendenhall Refuge should allow it as well.

Some people may worry that allowing the removal of DEW will negatively impact the refuge, due to increased hunting pressure. I disagree with this concern. The current refuge rules and use policies have been in place for almost 15 years and the negative interactions between hunters and other user groups have drastically subsided. I contend that the requirement that all hunters are permitted under the current rules will provide the same high level of competency and respect for other users. The impacts will only be felt by these most uninvited invaders and not the Juneau residents who love and frequent the refuge.

My proposal has two allowable methods of taking deleterious exotic wildlife. 1. By approved waterfowl hunting methods (shotgun, bow/arrow, and falconry) and 2. Air rifles with non-toxic pellets. I included air rifles as an approved method to provide a quiet, precise, and non-toxic method for surgical removal of DEW. I realize that allowing the use of a rifle in the refuge may sound dangerous to some people, but it is not. Remember, all hunters will have passed hunters safety (or are supervised by an adult who has) and they are responsible to know what directions are safe to shoot. I will remind the Board of Game that each spring, many Juneau residents head into the hills, behind their homes and around the refuge with .22 rifles looking for spruce grouse. This annual activity does not create safety issues. I'll also remind the Board of Game that federal and state laws for waterfowl hunting are well understood by Juneau hunters and the risk to misuse on the refuge are non-existent.

I've researched the City and Borough of Juneau's code (42.20.050 Discharging firearms) in the refuge and the only limitation is that shotguns are exempt from the 1/4 mile from a road rule while in the refuge. By city code, pellet rifles could only be fired if more than 1/4 mile from a road, and I don't think this is a problem. The sand islands on the refuge are the main target locations for DEW, so I don't see a need to change the city code at this time.

I ask the Board of Game to consider several points:

Please keep the reference to all deleterious exotic wildlife, as defined in 5 AAC 92.990, so that any new species added to the statute in the future can be assimilated accordingly. Carving out one or two species, such as saying "only starlings can be hunted on the refuge," is not a useful management tool. Who knows what new invader will arrive in the future and the sooner an invading species can be eradicated, the better.

Secondly, allowing the use of air rifles is a low-risk addition to the regulations to combat this important issue. Starlings (and all deleterious exotic wildlife) must be eradicated and air rifles are a low impact, highly effective tool to be used by permitted Juneau hunters.

**Alternative Amendment:** If the Board of Game must modify my request, I ask that at the very least, that the regulations be changed to allow the taking of all deleterious exotic wildlife during established waterfowl seasons with approved methods for waterfowl. At the very least, we should be able to remove DEW when we're already out on the refuge hunting waterfowl.

Below are just a few references to the damage caused by the European Starling and why they must be eradicated from the refuge.

In the 2004 document “**HOTSPOTS Bird Survey of the Mendenhall Wetlands,**” the local authors noted the presence of the European Starling and multiple bird species, such as the Mountain Bluebird, who are often directly displaced by the Starling. Starlings are incredibly aggressive, and it has been well documented that they devastate native bird populations as they displace fellow cavity-nesting birds.

<https://www.naturebob.com/sites/default/files/Hotspot%20report.pdf>

**USDA Document on Starling Damages:**

[www.aphis.usda.gov/wildlife\\_damage/reports/Wildlife%20Damage%20Management%20Technical%20Series/European-Starlings-WDM-Technical-Series.pdf](http://www.aphis.usda.gov/wildlife_damage/reports/Wildlife%20Damage%20Management%20Technical%20Series/European-Starlings-WDM-Technical-Series.pdf)

**European Starlings: A review of an Invasive Species with Far-reaching Impacts:**

<https://digitalcommons.unl.edu/nwrcinvasive/24/>

**PROPOSED BY:** Erich Schaal

(EG-F22-116)

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**PROPOSAL 41**

**5 AAC 92.530(23). Management areas.**

Eliminate the Douglas Island Management Area in Unit 1C as follows:

Remove the Douglas Island Management Area in Unit 1C from regulation.

**What is the issue you would like the board to address and why?** This proposal would remove the Unit 1C Douglas Island Management Area from current regulation. There is no science or data suggesting this management area is necessary or effective, particularly as it applies to wolf management. Wolves are transient to and from Douglas by either swimming the Gastineau Channel at high tide or crossing overland at low tide. It is very hard to manage and set a quota for a population of any species, especially one that is very wide-ranging. Wolf predation has reduced the deer population on the island which is estimated using the Department of Fish and Game’s (ADF&G) annual deer pellet survey at two locations on the north end of the island. Douglas Island is used by deer hunters who don’t have boats; it is often where youth and new hunters have relatively easy access. ADF&G data show that the deer populations on Douglas increased when wolves were actively trapped without a quota. Removing this management area from regulation will allow for wolf management using hunters and trappers during the allowed seasons, while removing a burden on ADF&G staff, and potentially increasing deer populations for sport hunting and wildlife viewing.

**PROPOSED BY:** Juneau Douglas Fish and Game Advisory Committee

(EG-F22-082)

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# **Ketchikan Area & Prince of Wales Island – Units 1A & 2**

## **PROPOSAL 42**

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

Extend the deer season to December 31, in Unit 1A Remainder as follows:

Make the following changes to:

Unit/Area: Unit 1A Remainder

Bag limit: Four Bucks

Permit/Hunt #: Harvest Ticket

Open Season: Aug. 1- **Dec. 31.**

Note; the only thing that changes is the ending season date from Nov. 30 to Dec. 31.

**What is the issue you would like the board to address and why?** I would like to see more deer hunting opportunity in Unit 1A. Adding one more month of deer hunting to the Remainder of Unit 1A (not to include the Cleveland Peninsula) would aid hunters who have time or financial constraints to fill their deer tags in the current season. The deer season was changed in 2011, shortened by one month to allow the low deer population to recover after the hard winters of 2007/2008. Current harvest data from ADF&G indicates the deer numbers have rebounded.

**PROPOSED BY:** Ed Toribio

(EG-F22-100)

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## **PROPOSAL 43**

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

Increase the resident bag limit to two goats in Unit 1A as follows:

We propose to allow Alaska residents the opportunity to harvest a second mountain goat in the defined area of RG001, Unit 1A.

- a) Resident Open Season (Subsistence and Nonresident Units and Bag Limits General Hunts) Open Season (1) Unit 1(A), Revillagigedo Aug. 1 - Dec. 31 Aug. 1 - Dec. 31 Island, except that portion (General hunt only) south and west from Donnelly Point to Naha Bay, Roosevelt Lagoon, Naha River, and Heckman Lake, the divide between Heckman Lake and the head of Salt Lagoon and the western shores of Salt Lagoon and George Inlet to Mountain Point 1 goat by registration permit only; the taking of nannies with kids is prohibited Unit 1(A)
- b) **For Alaska residents, a second mountain goat registration permit (Unit 1A) may only be issued if the goat harvested with the first registration permit was a billy. For those hunters who harvested their first goat in Unit 1A the pursuit of a second goat can't occur in the TCA (Trend Count Area) of the original harvest. Taking of nannies with kids is prohibited in Unit 1A.**
- c) **Resident hunters looking to pursue a second goat can receive a second registration permit after presenting the harvest record or sealing documents from their first harvest to ADF&G in Ketchikan.**

If adopted an Alaska resident is only allowed to be issued and in possession of one RG001 goat permit at one time. A second RG001 goat permit will be issued only after successful harvest and sealing of a male mountain goat. If a female goat is harvested on the first permit the hunter is ineligible to receive a second permit. If a second permit is issued the hunter would be unable to hunt in the trend count area (TCA) of the first harvest. The second permit must be hunted in another TCA. The change in regulation would not prevent a hunter from harvesting a female mountain goat with the first permit. It would prevent a hunter who did harvest a female goat on their first registration permit from being issued a second. The second permit would allow for harvest of a male or female goat, harvesting of a female goat with kids is prohibited.

It is our belief that if the board was to implement this change to regulation the increase in hunting pressure and harvest would be minimal. Due to well established limitations such as access, weather, time and resources, only a few local residents would consider and pursue this additional harvest opportunity. For those that would pursue a second mountain goat, it would be another opportunity to secure high quality protein and could lead to distributing effort to other less traditional areas.

For local hunters the ability to harvest a second mountain goat while being required to hunt in a different TCU could lead some hunters to explore and pioneer new areas. Pioneering of new areas utilized by mountain goats will better distribute hunting pressure and help to maintain the aesthetics of the hunt for more individuals. Boots on the ground and the information derived from exploring new hunting grounds would be of value to local wildlife managers.

**What is the issue you would like the board to address and why?** The Ketchikan Fish and Game Advisory Committee would like to increase the bag limit for goats in Unit 1A for Alaska residents to two goats.

Mountain goats are the most under-utilized game species in Unit 1A. Recent modifications in management, namely expanding the number of TCAs from 14 to 43, the use of a sightability correction model and harvest based on a sliding scale are expected to increase harvest opportunity. Modifications in management with current sealing requirements will allow for TCAs to be closed by emergency order when harvest warrants, thus protecting potentially vulnerable populations while maintaining harvest opportunity in other TCAs.

Unit 1A has three distinct goat populations. Two mainland populations are considered native to the Cleveland Peninsula and Misty Fjords. The third population was introduced to Revillagigedo Island from plants in 1983 and 1991. Populations resultant from the plants currently provide registration and draw permit opportunity. Goats are currently distributed throughout all suitable habitat on Revillagigedo. Modifications in management will also allow for the harvest of a greater percentage of the population of an introduced population vs. a native population. Local resident hunters are the largest group currently pursuing mountain goats. From 2013-2017 they represented 50% of successful hunters for an annual average of 16 harvests.

Due to loss of deer hunting opportunity on federal land on Prince of Wales and increasing pressure on Gravina Island and Revillagigedo Island, mountain goats provide a viable hunting opportunity to put meat on one's table and in the freezer for local resident hunters.

**PROPOSED BY:** Ketchikan Fish and Game Advisory Committee (HQ-F22-016)  
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**PROPOSAL 44**

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

Extend the goat season in Unit 1A Remainder as follows:

Extend the current goat season in the Remainder of Unit 1A for RG001 from its current season to allow the month of January to harvest of goats.

Season dates: August 1–January 31 for RG001

**What is the issue you would like the board to address and why?** To extend the current registration goat hunting season in Unit 1A (RG001) to January 31.

The current mountain goat season runs from August 1st to December 31st in Unit 1A Remainder. Extending the season to January 31st would allow 31 additional days to harvest goats within the unit which residents could take advantage of after the deer seasons end on December 31st.

This season would be for both resident and nonresident hunters.

Allowing the season to be extended would allow trappers who pursue furbearers in areas inhabited by goats to hunt goats opportunistically.

Allowing the season to be extended would be beneficial to the local residents as it offers an alternative source of game meat after the deer season is over in Unit 1A.

The most current harvest and effort information from the Department of Fish and Game website done in 2017 states that there were 107 permits issued for RG001 which 66 of those applicants did not hunt.

A solution would be to implement a block management process with goats so that certain drainages may be shut down, but not the entire hunt.

This proposal would advocate for the harvest of goats by local people, but also allow the nonresident and nonlocal hunters to harvest goats during this time of year.

Note all nonresident hunters must be accompanied by a guide or immediate family.

**PROPOSED BY:** Ketchikan Fish and Game Advisory Committee (HQ-F22-017)  
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## **PROPOSAL 45**

**5 AAC 84.270. Furbearer trapping.**

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

**5 AAC 92.008. Harvest guideline levels.**

Raise the population objective from 150-200 wolves to 250-350 wolves in Unit 2, and raise the threshold for closing the season from 100 to 200 wolves as follows:

General authority, as applicable: 5 AAC 84.270. (13), 5 AAC 85.056(1), and 5 AAC 92.008.

The annual harvest of wolves in Unit 2 shall be managed to maintain a unit-wide population objective of 250-350 wolves.

In light of this historic data, we suggest the current population objective of 150-200 wolves is both too low and too narrow. It should align more closely with ~250-350 wolves when conservation measures were initially put in place. The goal is to maintain a number that may sustain a significant annual harvest and not lead to a downward spiral in the wolf population.

To that end, and until a more rigorous evaluation of this vulnerable population is completed, we suggest that the Board of Game raise the threshold for season closure from 100 to 200 wolves, and raise the population objective from 150-200 wolves (current), to 250-350 wolves.

**What is the issue you would like the board to address and why?** At the January 2019 Board of Game (BOG) meeting, the BOG adopted a spring wolf population objective between 135-180 wolves in Unit 2. In the discussion record, the lower goal of the population objection (135 wolves) was derived by subtracting 40% of the Department of Fish and Game (department) historic population point estimate. One hundred wolves was set as the lowest acceptable population level for wolves in Unit 2. This was because the BOG believed that there was a 40% maximum mortality that the wolf population could recover from year-to-year, as long as trappers do not take too many adults. The upper limit of the population objective was based on 20% of the low-end population estimate.

The population objectives were adopted by the board in 2019 in step with a new proposal to manage wolves by population objective. The department specifically avoided recommending those objectives, deferring instead to the BOG and the public process. In that process, the BOG referenced wolf population estimates gathered in the 2014 and 2015 season<sup>1</sup>, which was the all-time low point in the Unit 2 wolf population. The department has since adopted the position that these early estimates were likely biased low.<sup>2</sup> On that basis alone, the population objectives need to be revised to reflect the new, more accurate population numbers.

Some history may be useful in revising this objective. The department's research biologist in 1996 published a population estimate for Unit 2 that was based on two different methodologies. One, based on home range modeling, estimated the wolf population at 321. The second, based on empirical observations of wolves from the air, returned a population estimate of 218 wolves. He believed the first method (home range) *overestimated* the population due to the fact that many of the islands in Unit 2 are not permanently occupied by wolves. The second method (empirical observations) was believed to underestimate the population because of heavy wolf harvest in the area preceding the fall 1994 counts. He therefore averaged the two and produced his best estimate of the Unit 2 wolf population at the time: 269 wolves<sup>3</sup> (Roffler et al. 2016).

This population estimate was low enough to raise concerns by the BOG about unsustainable harvest, which at the time, was ranging from 85-105 wolves per year<sup>4</sup>. Consequently, the BOG, in

1997, enacted wolf harvest guidelines that capped legal harvest at 25% of the most recent population estimate.

During the 1980s and early 1990s, the Unit 2 wolf population probably hovered between 250 and 350 wolves, with 30-50% being harvested annually. As the population declined through the 1990s and 2000s, the static harvest cap of 90 wolves (later reduced to 60 wolves) drove the population further downward. In 2014, if the Spatially Explicit Capture–Recapture (SECR) population estimate showed the Unit 2 wolf population numbered just 89 animals.

The department excused itself from establishing a population objective in 2019, preferring, instead, to let local residents set it. The public has no way of knowing wolf carrying capacity, much less what number of wolves might be needed to maintain viability or to provide for a maximum sustained yield.

The decision to set 100 wolves as the minimum did not include a consideration of the genetic diversity needed to sustain this isolated, genetically distinct population; genetic bottlenecking, susceptibility to rabies and disease; resiliency to harvest over 40%; or resilience to habitat fragmentation and loss from old growth logging. In fact, the department conducted no population viability analysis to support the BOG’s decision to set 100 wolves as the minimum acceptable level.

Since 2019, and in light of new genetic studies, it appears the minimum population number has been on the department’s mind. At a public hearing in Prince of Wales on November 9<sup>th</sup>, 2021, the department representative stated, that “new genetic data raises questions about genetic diversity to prevent inbreeding” in Unit 2 and that the agency was keeping the trapping season short (one month) because, “the population objective might not be genetically sustainable.”

There is no area within Unit 2 where a wolf pack is not exposed to legal and illegal killing. With no evidence of immigration into Unit 2 from surrounding management areas, a small residual population of 100 wolves could be feasibly extirpated, and risks a positive ESA listing decision.

<sup>1</sup> “When setting the current fall population objective (150–200 wolves) the Alaska Board of Game referenced estimates from 2014 and 2015.” (ADF&G press release 10 Nov 2021)

<sup>2</sup> “Although ADF&G’s Unit 2 wolf population estimates have always been reasonable and consistent with the DNA collected, analysis of data from 2019 and 2020 suggests earlier estimates may have been biased low. Along with incremental improvements in capturing DNA from hair samples, in 2019 and 2020 ADF&G first had access to DNA from relatively large numbers of wolves harvested within the study area during the October–December study period. That DNA collected at sealing contributed to larger datasets available for the 2019 and 2020 population estimates and in part, appears responsible for higher estimates in those years. Fewer samples from harvested wolves available for earlier estimates may have biased those estimates low.” (ibid)

<sup>3</sup> Page 9, in: *Roffler, G. H., J. N. Waite, R. W. Flynn, K. R. Larson, and B. D. Logan. 2016. Wolf population estimation on Prince of Wales Island, Southeast Alaska: a comparison of methods. Alaska Department of Fish and Game, Final Wildlife Research Report ADF&G/DWC/WRR-2016-1, Juneau.*

<sup>4</sup> “These results are consistent with observations made in the field by biologists and trappers who believe that wolves on Prince of Wales and Koscusko Islands were at a population peak during winter 1992-93 and have declined since, owing primarily to trapping and hunting (in GMU 2, 86, 105, 103, 85, and 99 wolves were reported killed during the 1991-92, 1992-93, 1993-94, 1994-95, and 1995-96 trapping seasons, respectively”. From *Person, David K.; Kirchhoff, Matthew; Van Ballenberghe, Victor; Iverson, George C.; Grossman, Edward. 1996. The Alexander Archipelago wolf: a conservation assessment. Gen. Tech. Rep. PNW-GTR-384. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 42 p.* Person et al. 1996. *Person, David K.; Kirchhoff, Matthew; Van Ballenberghe, Victor; Iverson, George C.; Grossman, Edward. 1996. The Alexander Archipelago wolf: a conservation assessment. Gen. Tech. Rep. PNW-GTR-384. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 42 p.*

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-023)

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**PROPOSAL 46**

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

Lengthen the hunting season for wolves in Unit 2, to open September 1 as follows:

Open to residents and nonresidents:

Five wolves

**September 1st** [December 1st] - March 31st

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

**What is the issue you would like the board to address and why?** We would like to see the start of wolf season in Unit 2 start on September 1 to better align with the federal season and to provide additional harvest opportunity.

Wolves are often encountered throughout the deer hunting season in Unit 2. Opportunistic harvest of wolves during this time is prohibited because the current season does not open until December 1.

We believe the department could benefit from the information that would be gathered from wolves harvested prior to the current season start date.

**PROPOSED BY:** Ketchikan Fish and Game Advisory Committee (HQ-F22-018)

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**PROPOSAL 47**

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

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

5 AAC 92.170. Adjust the requirement for all wolves taken in Unit 2 to be reported via call in as follows: Wolves taken during either the hunting season or during the trapping season must be called in within 48 hours and sealed within 14 days of harvest.

Require hunters and trappers that kill wolves to call in harvest information to a recorded department line within 48 hours of recovery. As wolves are taken and reported, they should be numbered sequentially to assist the department in censoring the wolf from the mark-recapture study. Very general location data should also be provided in the call-in. Sealing requirement remain the same (within 14 days). An area office, or a wolf sealing station, on Prince of Wales Island would make reporting and sealing requirements easy for the public, and provide other useful information.

**What is the issue you would like the board to address and why?** To manage wolves sustainably, the annual mortality the population experiences must be sustainable. The best way to ensure that is to monitor the harvest during the season, and close it if necessary to avoid over-

harvest. It is a standard management practice with many fish and wildlife populations, especially where the economic valuation is high (e.g. herring), or where the populations are small and relatively vulnerable (e.g. bowhead whales, musk ox). Historically, harvest information has been gathered when hunters and trappers present the wolf hides for sealing, typically within 30 days after the season closes. While presentation of the animal for sealing yields beneficial data (including genetic samples), a late report does not benefit the Spatially Explicit Capture–Recapture (SECR) population estimation technique, nor does it signal to the department when an overharvest is being approached.

The sooner a report is filed with the department, the better they can manage. We suggest a cell phone call to a recorded department line within 48 hours of recovery. This is a light burden to impose and does not affect a large number of people. During RY10–RY14 an average of 12 trappers per year were successful (range 10–17).<sup>1</sup> If one doubles it for safe measure, the reporting burden still falls on relatively few shoulders.

<sup>1</sup> Porter, B. 2018. Wolf management report and plan, Game Management Unit 2: Report period 1 July 2010–30 June 2015, and plan period 1 July 2015–30 June 2020. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2018- 10, Juneau.

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-030)  
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**PROPOSAL 48**

- 5 AAC 84.270. Furbearer trapping.**
- 5 AAC 85.056. Hunting seasons and bag limits for wolf.**
- 5 AAC 92.008. Harvest guideline levels.**

Change the methodology for setting the population objective for wolves in Unit 2 as follows:

General authority, as applicable: 5 AAC 84.270(13), 5 AAC 85. 056(1); 5 AAC 92.008.

5 AAC 92.008 is amended to read:

The minimum population objective for wolves in Unit 2 shall be based on a biological population viability analysis, using available demographic data.

We recommend that ADF&G contract with a qualified researcher to conduct a population viability analysis for wolves in Unit 2 using available demographic data. From that research, ADF&G recommends a baseline population objective based on the results. This will ensure that the population objective considers genetic diversity (based on the agency’s best available science), resilience to habitat loss or fragmentation, carrying capacity, and other biological factors.

**What is the issue you would like the board to address and why?** In the January 2019 Board of Game (BOG) discussion which set the population objective for wolves in Unit 2, the BOG adopted a spring population objective between 135-180 wolves. In the discussion record, the lower goal of the population objection (135 wolves) was derived by subtracting 40% of ADF&G’s historic population point estimate. One hundred wolves was set as the lowest acceptable limit of wolves in Unit 2. This was because the BOG believed that there was a 40% maximum mortality that the wolf population could recover from year-to-year, as long as trappers do not take too many adults. The upper limit of the population objective was based on 20% of the low-end population estimate.

The population objectives were adopted by the board in 2019 in step with a new proposal to manage wolves by “population objective”. Managing to a population objective is not a flaw, we simply have concerns that the minimum population objective (100 wolves) is inadequate to assure viability over the long term.

The department (ADF&G) excused itself from establishing a population objective, preferring, instead, to let local residents set it. The public has no way of knowing wolf carrying capacity, much less what number of wolves might be needed to maintain viability or to provide for a maximum sustained yield.

The decision to set 100 wolves as the minimum did not include a consideration of the genetic diversity needed to sustain this isolated, genetically distinct population; genetic bottlenecking, susceptibility to rabies and disease; resiliency to harvest over 40%; or resilience to habitat fragmentation and loss from old growth logging. In fact, ADF&G conducted no population viability analysis to support the board’s decision to set 100 wolves as the minimum acceptable level.

Since 2019, and in light of new genetic studies, it appears the minimum population number has been on ADF&G’s mind. At a public hearing in Prince of Wales on November 9<sup>th</sup>, 2021, a representative from ADF&G stated that “new genetic data raises questions about genetic diversity to prevent inbreeding” in Unit 2 and that the agency was keeping the trapping season short (one month) because, “the population objective might not be genetically sustainable.”

There is no area within Unit 2 where a wolf pack is not exposed to legal and illegal killing. With no evidence of immigration into Unit 2 from surrounding management areas, a small residual population of 100 wolves could be feasibly extirpated, and risks a positive ESA listing decision.

In sum, even if the minimum number of wolves (100) currently set by the BOG is sustained, there are serious concerns that 100 is too few wolves to provide a viable population. If the population objective, particularly the minimum, does not consider the above-listed conservation considerations, the state risks violating sustained yield principles by not taking what the courts consider a “hard look” at variables influencing a resource’s sustainability.

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-024)  
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**PROPOSAL 49**

- 5 AAC 84.270. Furbearer trapping.**
- 5 AAC 85.056. Hunting seasons and bag limits for wolf.**
- 5 AAC 92.008. Harvest guideline levels.**

Utilize the lower confidence interval of the wolf population for estimating the population in Unit 2 as follows:

General authority, as applicable: 5 AAC 84.270(13), 5 AAC 85. 056(1), 5 AAC 92.008

5 AAC 92.008 is amended to read:

The lower confidence interval of the population estimate shall be utilized for the purposes of estimating the wolf population in Unit 2.

To exercise the state's precautionary management policy in the face of high uncertainty, utilize the lower bound of the confidence interval as the assumed wolf population for purposes of management and quota-setting. To gauge the magnitude of this adjustment, this proposed change would lower the official estimated wolf population size in the fall of 2020 from 386 wolves to 320 wolves.

**What is the issue you would like the board to address and why?** The Board of Game (BOG) is currently utilizing the statistical mean of the Spatially Explicit Capture-Recapture (SECR) analysis as the assumed wolf population for purposes of management and quota-setting in Unit 2. Given uncertainty about the veracity of these population estimates, a more conservative measure is advisable.

The department has acknowledged that the observed changes in the Unit 2 wolf population from year to year, concurrent with reported harvests, are not particularly logical. An experienced trapper on Prince of Wales Island who sits on the Federal Subsistence Regional Advisory Council was succinct: "This roller-coaster ride of population estimates has really upset a lot of people, including myself....Somebody ought to admit there's some shortcomings somewhere."<sup>1</sup>

Let's examine this "roller-coaster ride" he references, starting in regulatory year 2013<sup>2</sup>, to illustrate why the population estimates for wolves in Unit 2 are questionable:

- In 2013, after 26% of the estimated wolf population was harvested, the population *declined* 60% (unlikely).
- In 2014, after 34% of the estimated Unit 2 wolf population was harvested, the population *increased* 21% (unlikely).
- In 2015, after 6% of the estimated wolf population was harvested, the population *increased* 114% (impossible).
- In 2016, after 13% of the estimated wolf population was harvested, the population *decreased* 3% (possible).
- In 2017, after 27% of the estimated wolf population was harvested, the population *decreased* 24% (unlikely).
- In 2018, after 25% of the estimated population was harvested, the population *increased* 76% (highly unlikely).
- In 2019, after 52% of the estimated population was harvested, the population *increased* 23% (impossible).

The numbers simply do not align. A barely sustainable 26% harvest in 2013 caused wolves to *decrease* 60%, while the same percentage harvest in 2018 supposedly caused wolf numbers to *increase* 86%. A population more than doubling in a single year (2015-2016) is impossible. A harvest of 52% in one year causing wolf numbers to increase 23% the next is impossible.

Year after year, the department reports the new numbers, absent critical thought as to their believability. Their desire to show wolf population increases, and "fight off" a possible listing by the U.S. Fish and Wildlife Service reflects the department's mindset, and a lack of objectivity.<sup>3</sup>

Why these estimates might be wrong is not for the Alaska Wildlife Alliance, or the Board of Game to determine. Any number of assumptions in the SECR methodology may have been violated, and

those violations may differ year to year. But what the Board of Game *must* do is recognize the inherent unreliability of these population estimates, and err on the side of caution when managing wolves on this basis.

The department has sometimes excused these swings by pointing out that these are the means (i.e., point estimates) and that there are quite broad confidence intervals around those means.

Pointing to poor precision as a positive, and as an excuse for population trends that do not make sense, only underscores the basis for our concerns.

Likewise, it is incorrect to claim, as the department does, that because confidence intervals overlap in consecutive years, the population is stable.<sup>4</sup> Failure to detect a decline does not mean there was no decline...it simply means the data were too variable to detect a decline. Declines of 50% or more can be “not significant” if the underlying data are noisy, and the confidence limits excessively large.

It appears the “goodness” of the population estimates is, in the department’s eyes, linked to the value itself. Signs of abundance, or increase, are trustworthy. Signs of scarcity, or decline, are discounted with reference to small sample size, or unrefined methods. Such post-hoc rationalizing damages the department’s credibility.

<sup>1</sup> From transcripts of an ADFG meeting with the regional Advisory Committee, held 20 November 2020.

<sup>2</sup> Data on population size and number of wolves harvested are by same regulatory year, as reported in ADF&G memos and reports, available online. The harvest numbers are for legally reported harvest only. They do not include illegal kills or natural mortality. Regulatory year, population size, and reported harvest are as follows: (2013,221,57) (2014,89,30) (2015,108,7) (2016,231,29) (2017,225,61) (2018,187,44) (2019,316,165) (2020,389,68) (2021, ,64)

<sup>3</sup> “And we need to keep that (cooperation) going, because we have a petition we have to fight off. Like I said, this is the time when we really have to work together to avoid a listing decision. Because this petition is more likely than the last one to end up in a listing decision, just because of how it’s structured.” (*quote from ADF&G Region 1 supervisor, at a 20 November 2020 meeting with the Southeast Regional Advisory Committee*).

<sup>4</sup> “The fall 2019 and fall 2020 population estimates are statistically indistinguishable suggesting that the Unit 2 wolf population is stable.” From: *6 Dec 2021 ADFG memo on Unit 2 Wolf Population update, fall 2020*.

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-025)

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## **PROPOSAL 50**

**5 AAC 84.270. Furbearer trapping.**

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

**5 AAC 92.008. Harvest guideline levels.**

Establish a population estimate and harvest limit based on Prince of Wales Island wolf population that excludes extrapolation from outer islands in Unit 2 as follows:

General authority, as applicable: 5 AAC 84.270. (13), 5 AAC 85.056(1), 5 AAC 92.008

5 AAC 92.008. is amended to read:

The preseason population estimate of wolves in Unit 2 shall be based on the estimated population of wolves on Prince of Wales Island alone, with no extrapolation for the outer islands in Unit 2.

Estimate the population of wolves on Prince of Wales Island, alone, and set a harvest cap based on this number. This would directly align the trapper effort with the department's population estimate. To the extent that some Unit 2 wolves occur on small islands, they can provide a minor source of immigration to Prince of Wales if and when wolf packs on that island are over exploited. This proposal echoes a recommendation of the interagency wolf technical committee.<sup>5</sup>

**What is the issue you would like the board to address and why?** The wolf population estimates in Unit 2 make untested assumptions about the relative density of wolves on the outer islands, leading to an overestimate of wolves on Unit 2, and a potential overharvest of wolves on Prince of Wales.

The department has little to no data on wolf densities on the outer Islands west of Prince of Wales. Since the Spatially Explicit Capture–Recapture (SECR) genetic population estimation method was developed (first estimate in 2013), > 99% of the cumulative samples (nodes x years) have been drawn from the northern 2/3rds of Prince of Wales Island<sup>1</sup>. Less than 1% of the sample effort is on islands (one, Sukkwan Island, which is separated from Prince of Wales Island by ~ 600 m of protected water).

The department has no samples in 40% of the Game Management Unit, including southern Prince of Wales Island, and scores of medium-sized and highly insular<sup>2</sup> islands to the west. The department justifies extrapolating to these islands with weak statements to the effect that “they have no reason to believe the wolf densities are different”.

That requires willful disregard for evidence from ADF&G wolf and deer researchers who have conducted field work on many of these islands and found wolf use was low and sporadic, especially on smaller, more distant islands. Only the three largest islands—Prince of Wales, Kosciusko, and Dall are large enough to have been continuously occupied by wolves for more than 20 years.<sup>3</sup>

Wolves that must piece together a pack home range by swimming among numerous islands have far greater energetic costs than a wolf pack that merely trots down a logging road. While wolves can swim, the odds of them making long swims (> 2 km), or multiple swims (> 3), or swims in high seas (outer islands) to reach an island too small to sustain a pack are scant. It is telling that when wolves were transplanted by boat to Coronation Island (in Unit 3), they quickly outstripped their food resources and began cannibalizing each other. They lasted 10 years, starving in place rather than swim 900-m of open-water to nearby islands with deer<sup>4</sup>...strong evidence that swimming represents considerable friction to wolf movements.

To assume that wolf habitat use on small islands, requiring multiple or long swims, is equivalent to wolf use on a large, contiguous land mass is contravened by empirical evidence. By ignoring this evidence, the department overestimates the Unit 2 wolf population, and so too overestimates the number of wolves that can be safely harvested.

<sup>1</sup> This summary is derived from maps showing the locations of sample nodes, by year, as reported in annual Departmental memos on the most recent Unit 2 wolf population estimate.

<sup>2</sup> Insularity refers to how likely an island is to be visited, or colonized. Smaller islands are less likely to be inhabited than large islands; and islands that require long swims, multiple swims, or swims in heavy seas are less likely to be inhabited than islands accessible via easy swims.

<sup>3</sup> “Within Unit 2, only the three largest islands—Prince of Wales, Kosciusko, and Dall—are known to have been continuously occupied by wolves for more than 20 years. Wolf packs may include several smaller islands...in their home ranges or may exclusively inhabit smaller islands for a few years, but they are unable to persist permanently”. From: *Person, David K.; Kirchoff, Matthew; Van Ballenberghe, Victor; Iverson, George C.; Grossman, Edward. 1996. The Alexander Archipelago wolf: a conservation assessment. Gen. Tech. Rep. PNW-GTR-384. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 42 p.*

<sup>4</sup> “Wolves failed to cross the 900 m of water to the adjacent Spanish Islands where deer densities remained moderately high throughout the study.” (from *Klein, D. R. (1995). The introduction, increase, and demise of wolves on Coronation Island, Alaska. Ecology and conservation of wolves in a changing world, 275, p. 280.*

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-026)

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## **PROPOSAL 51**

### **5 AAC 84.270. Furbearer trapping.**

### **5 AAC 85.056. Hunting seasons and bag limits for wolf.**

### **5 AAC 92.008. Harvest guideline levels.**

Establish a percentage of the Unit 2 wolf population that can be harvested on a sustainable basis, develop a harvest quota each season, require in-season reporting, provide the harvest to the public in real time, and allow three days’ notice before closing the season by emergency order as follows:

General authority, as applicable: 5 AAC 84.270(13), 5 AAC 85.056(1), 5 AAC 92.008.

5 AAC 92.008 is amended to read:

The Board of Game (BOG) is to establish the percentage of the wolf population that can be safely harvested on a sustainable basis. Using the department’s latest available population estimate, and accounting for wolf mortality (natural, legal human harvest, and illegal human harvest), the department develops a harvest quota each season. The department shall monitor the annual harvest of wolves in Unit 2 with in-season reporting. That reported taking shall be tallied and made available so trappers and hunters know whether the harvest quota is being approached. At least three days notice shall be given before a season is closed by emergency. An additional allowance of up to three days may be given if adverse weather conditions require.

This proposal speaks to the management framework only, and adopts the same method that was used to manage wolves in Unit 2 from 1997 through 2018. Returning to that method, with the benefit of annual population estimates, a population objective, more convenient in-season reporting requirements, and a transparent public process represents a significant improvement over the current system. This proposal echoes a recommendation of the Interagency Wolf Technical committee. <sup>2</sup>

It is understood that a majority of lands in Unit 2 (72%) are federal lands, administered by the USDA Forest Service (USFS). The USFS recognizes the state to be the primary manager of game species on federal lands when not in conflict with USFS government regulations. Hence, state regulations apply to all federal and state lands in Unit 2 unless a person is harvesting under federal subsistence regulations. The Federal Subsistence Board (FSB) sets regulations for federally qualified subsistence users on federal lands. In order to reduce regulatory confusion and ensure successful management of game species the FSB often aligns with State regulations. If the BOG adopts this proposal it is likely the FSB will adopt the regulation on federal lands for federally qualified users to avoid regulatory confusion and ensure successful management of wolves.

**What is the issue you would like the board to address and why?** The management scheme that the BOG adopted in 2019 (per the department’s recommendation), which aims to meet wolf population objectives set by the BOG by season length alone, is too blunt to meet the management needs of this wolf population. The current management scheme inadequately controls harvest, and requires annual Emergency Orders to work.

The department manages wolf populations by managing direct human-caused mortality. Mortality is most commonly controlled by limiting the number of hunters and trappers, installing bag limits, or establishing harvest quotas. It can be crudely controlled by adjusting season length, but without bag limits, trappers can take too many animals if conditions are ideal, or too few animals if conditions are poor. It is difficult to consistently and accurately predict the number of trappers that will participate, and the number of animals that will be taken, in a given season.

This was proven in the very first year (2019) the new population objectives management system went into effect. The prior year population estimate was 170 wolves in Unit 2 (or 178, depending on which department report is referenced). Either is squarely within the desired wolf population range of 150-200 wolves. The department had suggested, and the board adopted, a season length guideline of up to eight weeks when populations were in that range. In-season reporting requirements were also rescinded on the mistaken belief that this system would work well without monitoring the kill.

In that first 8-week season, a record 165 wolves were legally harvested and an untold additional number lost to natural mortality, wounding loss, and illegal take. The gross overharvest was shocking, but was explained by the department as being a result of higher-than expected trapper numbers—an admission that reinforces the inadequacy of a season-length only management tool.

To correct for this apparent problem, the department has abandoned the general season-length guidelines the board adopted. Instead, in every season since 2019, the department has shortened the trapping season by a “pre-emptive” emergency order/regulation. In effect, they anticipate the emergency, and substantially shorten the season under emergency authority before it even starts.

Using season length to control harvest amounts to a guessing game. Compounding the problem is the fact that this game now takes place behind closed doors. There is no opportunity for input from the BOG, or the public. The crude nature of this tool leaves wolves at risk. The opaque nature of this tool leaves the public frustrated and distrusting.<sup>1</sup>

<sup>1</sup> Resolution 21-04 by the City of Coffman Cove, passed 4 November 2020.

<sup>2</sup> “Any management plan should include population and **harvest objectives** for wolves, clear direction on how wolf abundance will be estimated and **measurable indicators that will trigger specific management actions** (emphasis added). This larger planning effort would be outside the scope of normal survey and inventory activities and to be successful should be led by ADF&G.” from:



**PROPOSED BY:** Alaska Wildlife Alliance

(HQ-F22-027)

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**PROPOSAL 52**

**5 AAC 84.270. Furbearer trapping.**

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

**5 AAC 92.008. Harvest guideline levels.**

Establish a harvest quota for wolves, between 20% and 35% of the estimated wolf population in Unit 2 as follows:

General authority, as applicable: 5 AAC 84.270 (13), 5 AAC 85. 056(1), 5 AAC 92.008.

5 AAC 92.008 is amended to read:

A harvest quota between 20% - 35% of the estimated population of wolves in Unit 2 is established by the Board of Game based on conservation concerns.

As a matter of policy, the Board of Game should establish an allowable percent mortality figure that varies between 20% and 35%, depending on where the current population sits relative to the objective. If the population needs to be reduced to meet population objectives, the Board of Game can institute a 35% mortality guideline. If, on the other hand, there is a conservation concern for wolves, a lower cap of 20% can be instituted.

This approach provides to trappers the maximum possible number of wolves to harvest while honoring the constitutional sustainability requirement, and moving towards the population objective. It is a biologically driven, based on empirical data from Unit 2, and can be set in a clear and transparent fashion by the board. Establishing this percentage is consistent with past practice, and will be even more successful as the department improves on its ability to estimate wolf population size and monitor in-season harvest.

**What is the issue you would like the board to address and why?** Neither the Board of Game nor the department has established a sustainable wolf harvest level for Unit 2.

The department is obligated under the Alaska State Constitution to manage wildlife resources on the sustained yield principle.<sup>1</sup> In common terms, sustained yield means managing for an ongoing annual harvest without jeopardizing the harvest (or yield) for future generations.

The percentage of a population that can be harvested annually, in perpetuity, is driven by various population traits, including age and sex structure, productivity, recruitment, immigration and natural mortality. Where human-caused mortality is compensatory, and immigration likely, human harvest rates of 17-48% of wolf populations can be sustained. If there is no possible immigration (as on Unit 2), or if human-caused mortality is partially additive to natural mortality, sustainable rates are lower—in the range of 22-25%.<sup>2</sup>

In studies of the wolf population on Unit 2, it was determined that in order to maintain current population levels, a level of mortality (from all causes: including natural, legal, and illegal harvest) for wolves in southeast Alaska is 30-35%<sup>3</sup>

The Board of Game has variously set the percentage of sustainable mortality between 20-30%, adopting the more conservative figure in years of particularly acute conservation concerns, and 30% in years of lesser concern.<sup>4</sup>

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<sup>1</sup>§ 4. **Sustained Yield** — Fish, forests, wildlife, grasslands, and all other replenishable resources belong to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses. From: *The Alaska State Constitution*.

<sup>2</sup>“Most studies demonstrate that high rates of reproduction and immigration can compensate for human-caused mortality rates of 17–48% (±8%; Fuller et al. 2003, pp. 184–185; Adams et al. 2008 [29%], p. 22; Creel and Rotella 2010 [22%], p. 5; Sparkman et al. 2011 [28%], p. 5; Gude et al. 2012 [25%], pp. 113–116). However, results of other studies suggest that harvest of wolves by humans are at least partially additive (Murray et al. 2010, pp. 2519–2520), and therefore, sustainable mortality rates may be lower than expected (~22–25%; Creel and Rotella 2010, p. 5). From: *Wolf Technical Committee. 2017. Interagency Wolf Habitat Management Program: Recommendations for Game Management Unit 2. Management Bulletin R10-MB-822. USDA Forest Service, USDI Fish and Wildlife Service, and Alaska Department of Fish and Game.*

<sup>3</sup>“Based on our analysis of birth rates and population size for wolves on Prince of Wales and Kosciusko Islands, we estimate the per capita birth rate for wolves to be approximately 0.33 (SE = 0.15). The buffering effects of immigration and emigration are probably limited for most of the wolves in southeast Alaska; consequently, total annual mortality should not exceed reproduction to maintain current population levels. Thus, to maintain current population levels, a level of mortality (from all causes: including natural, legal, and illegal harvest) for wolves in southeast Alaska is likely to be less than or equal to 30 to 35 percent. From: *Person, David K.; Kirchhoff, Matthew; Van Ballenberghe, Victor; Iverson, George C.; Grossman, Edward. 1996. The Alexander Archipelago wolf: a conservation assessment. Gen. Tech. Rep. PNW-GTR-384. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 42 p.*

<sup>4</sup>Since 1997, there have been 2 years at 25%, 17 years at 30%, and 3 years at 20%.

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-028)  
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## **PROPOSAL 53**

- 5 AAC 84.270. Furbearer trapping.**
- 5 AAC 85.056. Hunting seasons and bag limits for wolf.**
- 5 AAC 92.008. Harvest guideline levels.**

Establish an estimated unreported mortality rate for Unit 2 wolves to be used for establishing the harvest quota as follows:

General authority, as applicable: 5 AAC 84.270(13), 5 AAC 85.056(1), 5 AAC 92.008.

5 AAC 92.008 is amended to read:

An estimated unreported mortality rate of 35-50% shall be utilized in establishing an annual harvest quota of wolves in Unit 2.

The Board of Game should establish an estimated percentage of unreported mortality in the Unit 2 wolf population of between 35-50%, and count that percentage toward the annual allowable mortality. This proposal echoes a recommendation made by the Interagency Wolf Technical Committee recommends that harvest quotas continue to be adjusted annually for unreported kill.<sup>4</sup>

**What is the issue you would like the board to address and why?** The legal take of wolves in Unit 2 underestimates the total mortality in the wolf population, and thus leaves the state vulnerable to overharvesting a genetically distinct, isolated wolf population.

Wolves die from any number of causes, including legal harvest by trapping and hunting, wounding loss, illegal harvest (wolves killed but not reported or sealed per regulations), and natural mortality. Illegal mortality is particularly difficult to assess because illegal activities are not self-reported, and there is a minimal enforcement presence on Prince of Wales Island. Unreported human-caused mortality has been documented in Unit 2 at rates of 38% (Roffler et al. 2016a) and 47% (Person and Russell 2008) of collared wolves killed by humans (3 of 8 and 16 of 34 wolves, respectively). Causes of death in these unreported instances included gun shot, snare, and trap wounds, though it is important to recognize that data from most of these cases do not speak to intent. Some of these animals may have been injured during attempted lawful harvest but escaped, and so were not successfully recovered and therefore went unreported. Regardless, unreported human-caused mortality exists at fairly high levels in Unit 2. Harvest quotas should continue to account for this.<sup>1</sup>

There may be a bias against reporting killing of radio-collared wolves, which would inflate these numbers somewhat. That acknowledged, it is reasonable to assume that 35-50% more wolves die each year (including natural mortality) than are accounted for in the reported harvest.<sup>2</sup>

Explicit recognition of unreported mortality is not without precedent. For 2015 and 2016 the department documented an apparent decline in wolf numbers and documented a high rate of unreported human-caused mortality (Roffler et al. 2016). Consequently, as a conservation measure, the Board of Game reduced the wolf harvest quota by 50% to account for unreported mortality<sup>3</sup>.

<sup>1</sup> From: *Wolf Technical Committee. 2017. Interagency Wolf Habitat Management Program: Recommendations for Game Management Unit 2. Management Bulletin R10-MB-822. USDA Forest Service, USDI Fish and Wildlife Service, and Alaska Department of Fish and Game.*

<sup>2</sup> Person, David K.; Kirchoff, Matthew; Van Ballenberghe, Victor; Iverson, George C.; Grossman, Edward. 1996. *The Alexander Archipelago wolf: a conservation assessment. Gen. Tech. Rep. PNW-GTR-384. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 42 p.*

<sup>3</sup> Porter, B. 2018. *Wolf management report and plan, Game Management Unit 2: Report period 1 July 2010–30 June 2015, and plan period 1 July 2015–30 June 2020. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2018- 10, Juneau.*

<sup>4</sup> *Wolf Technical Committee. 2017. Interagency Wolf Habitat Management Program: Recommendations for Game Management Unit 2. Management Bulletin R10-MB-822. USDA Forest Service, USDI Fish and Wildlife Service, and Alaska Department of Fish and Game*

**PROPOSED BY:** Alaska Wildlife Alliance (HQ-F22-029)

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**PROPOSAL 54**

**5 AAC 92.008. Harvest guideline levels.**

Identify an area in Unit 2 for protected status for wolves as follows:

Under general authority, as applicable: 5 AAC 84.270(13), 5 AAC 85.056(1), 5 AAC 92.008.

Task the department with identifying 2/3rds of Unit 2 land area for protected status for wolves. Work to ensure the protected areas have relatively high deer carrying capacity and are large enough to be buffered from trapping pressure.

**What is the issue you would like the board to address and why?** Managing wolves by population objective requires accurate population size estimates. Tracking mortality requires accurate and timely reporting, as well as an estimate of illegal and natural mortality. Obtaining population and mortality data is difficult and costly, and its accuracy has been questioned.

An alternative is to manage the system spatially. If the wolf population can sustain ~30% annual mortality, then open ~ 1/3rd of the unit to wolf trapping each year and close the remainder. The areas subject to closure, and those that are open, could be established permanently by the Board of Game, or perhaps rotated on a long-term schedule. The goal would be to maintain large enough reserves for two-three packs of wolves to be protected and thereby serve as a source population for the “sink areas” that are producing the 30% annual harvest. Spreading the protected areas across the unit could help maximize genetic diversity.

**PROPOSED BY:** Alaska Wildlife Alliance

(HQ-F22-031)

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