ALASKA DEPARTMENT OF FISH AND GAME

STAFF COMMENTS FOR PROPOSALS 5, 48, and 52

SOUTHEAST REGION REGULATIONS PROPOSALS

ALASKA BOARD OF GAME MEETING

WRANGELL, ALASKA

JANUARY 23-27, 2026

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

PROPOSAL 5 – 5 AAC 85.020(1). Hunting seasons and bag limits for brown bear. Change the bag limit from 1 bear every four years to one bear every year in Unit 1.

PROPOSED BY: Trevor Embry

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the harvest restriction of 1 brown bear every 4 regulatory years that applies to Unit 1, which would allow both resident and nonresident hunters to harvest of a brown bear every year.

WHAT ARE THE CURRENT REGULATIONS?

Units and Bag Limit	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
Remainder of Unit 1	Sept. 15 – Dec. 31 (General hunt only) Mar. 15 – May 31 (General hunt only)	Sept. 15 – Dec. 31 Mar. 15 – May 31

1 bear every 4 regulatory years
By registration permit only

There is a positive customary and traditional use finding for brown bear in all subunits of Unit 1 outside of the Juneau Nonsubsistence Area and an amount reasonably necessary for subsistence as follows: Unit 1A 2–3 bears; Unit 1B 1 bear; Unit 1C 1 bear; Unit 1D 3–5 bears.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Resident and nonresident hunters would be able to harvest up to 1 brown bear every regulatory year throughout Unit 1, by aligning the bag limit with Unit 1C, Berner's Bay drainages. If adopted, this proposal may lead to increased harvest in mainland areas of the region.

BACKGROUND: The current harvest regulations allow for sustainable brown bear harvest in Southeast Alaska. Brown bears have a slow reproductive cycle; they begin breeding at 5 years old and have young every 3-4 years. Mainland bear populations inhabit landscapes with deep fjords and extensive icefields and are subsequently isolated in an island-like fashion. Minimal incidences of emigration and immigration occur among brown bear populations within many of these unique areas.

The Board of Game (board) has considered several similar proposals over the last 15 years in Southeast Alaska. During its 2013 meeting, the board adopted a proposal that allowed 1 bear every regulatory year in the Berners Bay area within Unit 1C. At the most recent meeting in

2023, the board considered and failed similar proposals for the Chilkat Range portion of Unit 1C due to concerns about sustainable harvest.

Brown bear harvest in Unit 1 has been stable over the last 10 years with 26 – 32 animals harvested annually (Table 1), until regulatory year (RY) 2019. At that time the COVID-19 pandemic occurred, which led to a short-term closure for nonresident bear hunters. However, resident hunters increased their hunting effort and overall, there was an increase in harvest during RY2019. In RY2020, natural food resources for bears were scarce throughout the region, which led to higher bear harvest, especially in Unit 1D. This resulted in some of the highest harvest recorded in the region. Due to concern about overharvest and a large number of bears taken in Defense of Life or Property (DLPs) in Unit 1D, the department took conservation measures and limited harvest for the next 5 regulatory years. The conservation measures and a reduced bear population overall resulted in low harvest, with the lowest year being in RY2021.

Table 1. Spring and fall harvest and number of hunters for each regulatory year 2015–2024, GMU 1, Southeast, Alaska.

Regulatory year	Total hunters	Nonresident hunters	Spring harvest	Fall harvest	Total harvest
2015	288	32	18	9	27
2016	304	27	18	9	27
2017	349	30	19	13	32
2018	341	31	14	12	26
2019	360	17*	22	12	34
2020	460	36	19	27	46
2021	317	22	11	3	14
2022	301	26	19	4	23
2023	353	23	14	2	16
2024	339	18	25	11	36

* Spring 2020 brown bear seasons were closed to nonresidents due to COVID-19 restrictions.

Over the last 10 years, most of the Region 1 brown bear mortality and harvest has occurred in Units 1C and 1D (Figure 1 and Figure 2) due to higher brown bear densities in the northern portion of Unit 1 compared to the southern portion. After the department took conservation measures in Unit 1D in 2020 by purposefully limiting harvest, the greatest percentage of the harvest since then has come from Unit 1C.
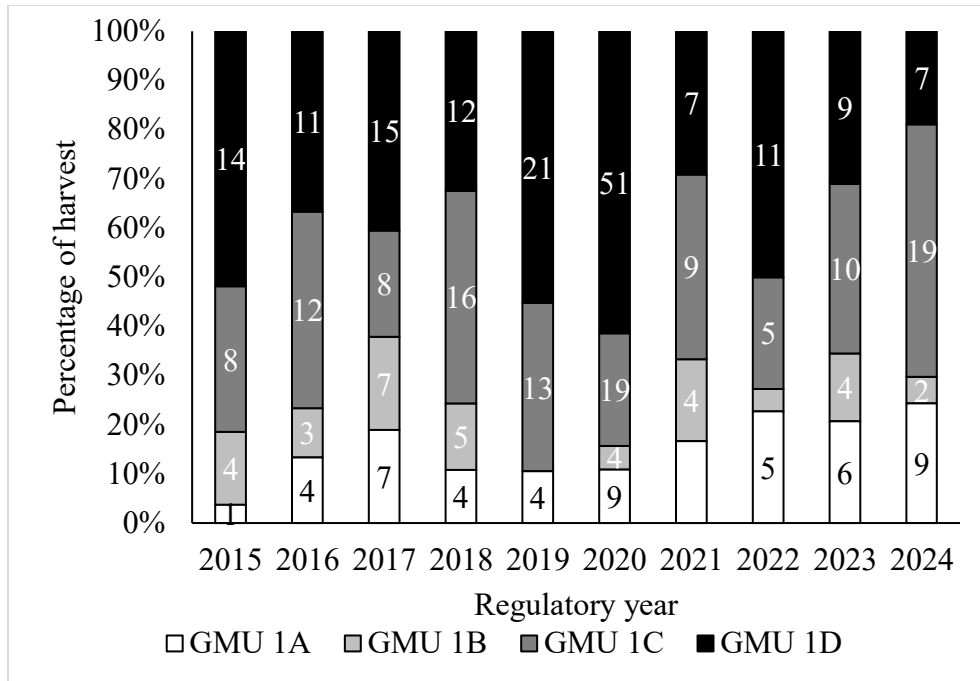
Figure 1. The percentage of total mortality in Unit 1 by subunit from RY2015–RY2024, Southeast, Alaska. The number within each column is the total mortality from that year by unit.
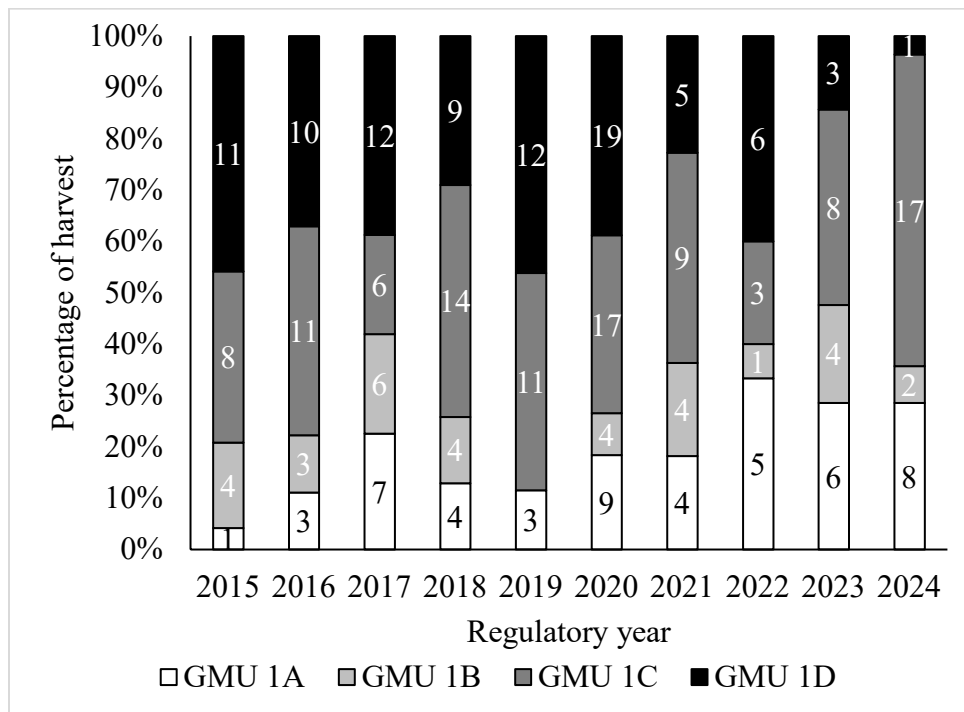

Figure 2. The percentage of the harvest in Unit 1 by subunit from RY2015–RY2024, Southeast, Alaska. The number within each column is the total mortality from that year by unit.

The department does not have a current population estimate for Unit 1 as a whole. In 1993, the department estimated Unit 1 was inhabited by 1,042 bears (1A = 291, 1B = 180, 1C = 334, and 1D = 237). A conservative harvest of this population would be 4%, which would equate to a harvest of 42 bears. However, harvest is not uniform across the unit and managing for a 42-bear harvest across Unit 1 would lead to areas of localized depletion that could persist for an extended period due to low immigration and emigration for the Southeast brown bear population. These low-density populations could also impact guiding services. Much of the mainland brown bear guiding occurs in Units 1C and 1D. These are the same units that would likely see increased hunting effort that could reduce opportunity for brown bear guides.

Current brown bear hunting regulation structure and monitoring is not designed to respond to minor fluctuations in brown bear populations. For several years hunters reported seeing more brown bears in some parts of Unit 1 whereas during the current hunting season, some hunters are reporting lower numbers of bears in the Chilkat Range. The department manages brown bears at a 4% harvest level in Southeast Alaska, which provides opportunity and has proven sustainable. Harvest success is approximately 14% for hunters in Unit 1, which is high when considering that many hunters only get a tag as a precaution for an unfriendly run-in with a bear.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. The department has successfully addressed conservation concerns when they occur through existing management strategies (e.g., Unit 1D). Anecdotal information about brown bear abundance in other areas of Unit 1 has been contradictory. Not many hunters have an interest in taking multiple brown bears, suggesting that if the proposal were adopted, harvest may not increase substantially across Unit 1; however, localized impacts to the population may be observed.

The department contacted the author of the proposal and clarified that this proposal only applies to RB062 and RB072. Information about Unit 1D was included as additional background.

There are 4 proposals asking to take areas of Region 1 to 1 bear every year. Some proposals suggest the rationale that because it has not caused declines in Berner's Bay that it should be more widely implemented. Unlike many areas in Southeast, Berner's Bay is very isolated and difficult to access, making the harvest of a bear in this unit a challenge. That is not the case for the other areas proposed during this meeting. Brown bear populations naturally fluctuate, and the department's current monitoring and harvest management is not designed to initiate in-season management. Since the early 2000s, the department has tried to manage the harvest of brown bears in Southeast Alaska at or just above 4% of the population to ensure sustainable harvest. Areas with greater harvests, such as Unit 1D, have indications of overharvest prior to 2020, when 49 bears were harvested in a single year and before the department implemented conservation actions. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

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

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PROPOSAL 48 – 5 AAC 92.008. Harvest guideline levels. Change the population objective range for wolves in Unit 2 from 150–200 wolves to 200–300 wolves.

5 AAC 92.008. Harvest guideline levels.

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

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

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? This proposal would increase the population objective range for wolves in Unit 2 from 150–200 wolves to 200–300 wolves.

WHAT ARE THE CURRENT REGULATIONS? The current state regulations for the management of Unit 2 wolves require the department to maintain the Unit 2 wolf population within an objective range of 150 to 200 wolves. When the population is outside of this population objective range, the department would limit or increase wolf harvest to bring the population within the objective range.

5 AAC 92.008. Harvest guideline levels.

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

(1) Wolves: the annual harvest of wolves in Unit 2 should be managed to maintain the unitwide population within a range of 150–200 wolves;

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

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The effect of this proposal would be to align the regulations regarding wolf management in Unit 2 with how the department has been managing the population since fall of 2019. Retrospective analysis indicates the Unit 2 wolf population was larger than earlier estimates provided to the board.

BACKGROUND: From statehood until 1997 wolf harvest in Unit 2 was managed through season dates and bag limits. Following several years of high wolf harvest and a 1993 Endangered Species Act (ESA) petition, in 1997 the Board of Game (board) adopted a Harvest Guideline

Level (HGL) for wolves in Unit 2 of 25% of the most recent population estimate. In 1994 the department estimated the population to be at about 355 wolves, so the department established a harvest quota of 90 (~25% of 355) wolves per year with harvest monitored through a 14-day sealing requirement. The department closed wolf hunting and trapping seasons by emergency order (EO) when harvest approached the quota. From 1997 through 2012, the season was only closed early once, in 1999.

Based on more recent data, in 2000 the board raised the HGL to 30% of the most recent Unit 2 wolf estimate, but the department kept the harvest quota at 90 wolves per year. At that time regular population estimates were not possible, but in 2004 Unit 2 wolf abundance was again estimated at about 345 wolves. Following six consecutive years with reported harvest below 40 wolves and concern that the wolf population had declined, in 2010 the department reduced the harvest quota to 60 wolves per year. The regulatory year 2012 Unit 2 wolf harvest approached the new quota in March 2013, and the wolf hunting and trapping seasons were closed by EO. In 2014 the department further reduced the quota to 25 wolves. Reported harvest also approached or exceeded quotas from 2014-2018 resulting in additional season closures by EO.

In 2012, the department initiated a new method of estimating Unit 2 wolf abundance using a spatially explicit capture-recapture (SECR) approach based on identifying individual wolves through DNA in hair captured on an array of scented hair boards distributed throughout northern and central Prince of Wales Island and tissue samples from harvested wolves. This method provides for annual population estimates. The department first used SECR estimates to manage harvest in 2015. A large decline between the 2013 and 2014 population estimates resulted in the board reducing the HGL to 20% from 2015–2018. With a 14-day sealing period, the department had difficulty monitoring harvest closely enough to keep harvest within smaller quotas.

To address shortcomings in Unit 2 wolf management identified by the department and the public, in 2017, the department began developing a new Unit 2 wolf management strategy. Reasons for developing a new strategy included concerns from Unit 2 wolf trappers that the harvest quota system resulted in short seasons with unpredictable closure dates, the department had difficulty monitoring and maintaining harvest within the quota, and the department lacked board and public guidance on the appropriate population size for a sustainable Unit 2 wolf population. The new strategy was developed in consultation with Unit 2 hunters and trappers, Fish and Game Advisory Committees, and the Southeast Federal Subsistence Regional Advisory Council.

Through those consultations, the department developed a strategy for managing the Unit 2 wolf harvest that based annual harvest opportunity on the most recent population estimate, recent harvest rates, and other information to maintain the wolf population within a fall population objective established by the board. Annual population estimates verified the population was within the objective range and sustainably managed. In 2019 the department submitted regulatory proposals to implement the new strategy. The board adopted those proposals, establishing a fall population objective of 150-200 wolves, and endorsed the department's 2019 management plan.
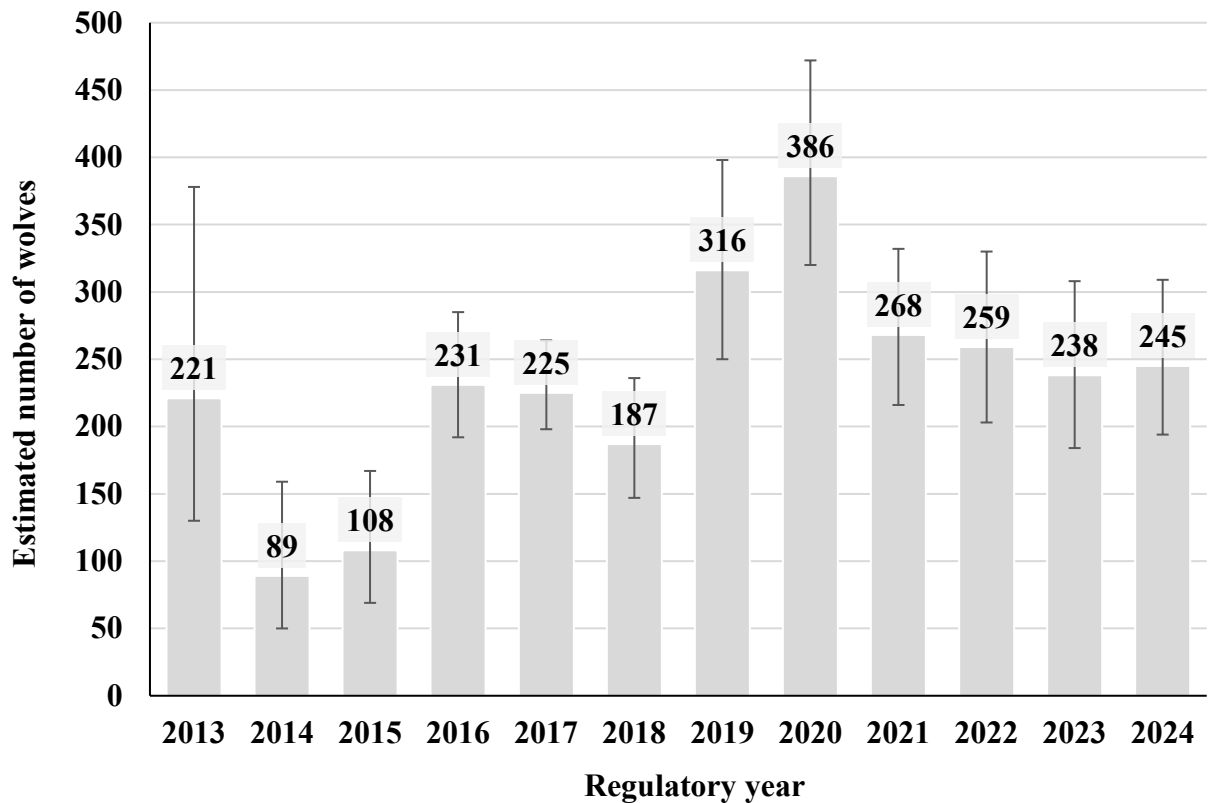
Figure 1. Fall wolf population estimates for Unit 2, 2013 – 2024. Numbers indicate the point estimate used for management and whiskers indicate the 95% confidence interval.

Based on fall population estimates for 2013–2017, the board established a fall population objective range of 150–200 wolves but explicitly recognized that the objective would need to be adjusted as new information became available. A retrospective analysis by the department found that earlier estimates used during deliberations by the board when setting the current population objective, likely underestimated the true population size. This proposal adjusts the population objective range to reflect this.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal as it would align the regulations with the department's Unit 2 wolf management approach since the fall of 2019. The department has managed conservatively during this time to maintain sustainable wolf population and harvest opportunity. The department has continued to refine data collection and analysis and has applied improved spatial and temporal analysis techniques to refine annual Unit 2 wolf population estimates. Maintaining a slightly higher population objective may help to slow inbreeding and the loss of genetic diversity given there are more individuals available for reproduction. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted. Until the department

finishes ongoing additional research, this more conservative management approach is warranted to maintain a sustainable population and harvest.

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

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PROPOSAL 52 – 5 AAC 92.127 Intensive management of identified big game prey populations. Add Unit 2 deer as an area and species for intensive management to increase the harvest of wolves.

PROPOSED BY: Patricia Phillips

WHAT WOULD THE PROPOSAL DO? The Board of Game (board) would consider adopting an intensive management plan for deer in Unit 2 under 5AAC 92.127. If adopted, the plan will review wolf and black bear population status and predation on deer and current habitat status in Unit 2.

WHAT ARE THE CURRENT REGULATIONS? There is currently no intensive management (IM) plan for deer in Unit 2. However, the board identified deer as important for providing high levels of harvest for human consumptive use in Unit 2. The current intensive management population objective for deer in Unit 2 is 71,000 and the harvest objective is 2,700.

There is a positive customary and traditional use (C&T) finding for deer in Unit 2, and an amount reasonably necessary for subsistence (ANS) of 1,500 – 1,600 deer. There is a positive C&T for wolves in Unit 2 and an ANS of 90% of the harvestable surplus.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The board would consider adding an intensive management plan for deer in Unit 2 to 5AAC 92.127 in an effort to increase the deer population based on the proponent's request to add Unit 2 as an area of intensive management for the harvest of wolves. In writing this analysis, the department recognizes that IM management plans are written to benefit prey, not predators, and addresses the proposal from that perspective.

BACKGROUND:
The department does not have an accurate way to measure the entire Unit 2 deer population, so it is unknown where the population is in relation to the objective. Thick canopy precludes aerial surveys and pellet surveys only provide information on relative abundance. Although the Unit 2 deer harvest met or exceeded the harvest objective from regulatory years (RY) 2005–2016, harvest has remained below this objective since RY2017 (Table 1). Conversations with hunters from Unit 2 indicate that harvest opportunity for and access to deer have become more difficult due to a perceived smaller population along with the outcomes of logging and associated forest stand succession. Deer populations are difficult to measure directly via aerial surveys or other

methods, so the department uses "catch per unit effort" (CPUE) of deer hunters. This is measured as the average number of days hunted to harvest a deer and used as an index of abundance for the population. However, CPUE is not a direct measure of the deer population size. Factors such as hunter access can influence CPUE. Current CPUE data indicate that hunters, on average, are spending more time hunting to harvest deer (Table 1). The average CPUE for deer in Unit 2 from RY2005–RY2016, when harvest was above the IM harvest objective, was 3.45 days hunted per deer harvested. Conversely, from RY2017–RY2024 the average CPUE was 4.8 days hunted per deer harvested (Table 1). It takes a similar amount of time to harvest a deer in Unit 2 as it does in Unit 3 (Table 2). On average, it takes less time to harvest a deer in Units 1A and 4, although Unit 1A is experiencing record harvest and Unit 4 has always had the highest population of deer in Alaska as indicated by pellet counts and CPUE. The Unit 2 deer harvest has decreased because there have been fewer hunters and fewer deer harvested per hunter (Table 1) during the RY2017–RY2024 period. The department acknowledges that deer populations fluctuate over time and interprets the combination of exhibited harvest factors to suggest that the Sitka black-tail deer population in Unit 2 has been more difficult for hunters to access and harvest. Current hunter harvest metrics (number of hunters, deer harvested, days per deer, and deer per hunter) were lower than levels observed in RY2005–RY2016, yet similar to levels observed from RY1997–RY2004. This is most likely a reflection of hunter effort and not necessarily a representation of a substantial change in the deer population.

While quantifying the Unit 2 deer population is challenging, the department is exploring new methods to improve our ability to measure deer density and abundance. Over the past 15 years, we have developed methods to identify individual deer by assessing the DNA found in their pellets which are encountered more readily than the deer themselves. The department has incorporated these data into DNA mark-recapture density estimates. Remote trail cameras and the photos they capture of deer have also become integral to the department's abundance estimation methods and will ultimately improve our understanding of population trends. In Region I, the department has established systematic camera arrays in winter habitat in most units. The population index and density data gathered from these cameras will replace the spring pellet group surveys previously conducted to inform sustainable management of deer populations. In Unit 3 the department is currently conducting new studies to incorporate these two sources of data, fecal DNA extracted from deer pellets and trail camera array detections, into population and density estimates of deer populations. Our objective is to establish a protocol for monitoring deer abundance in Region I that focuses population monitoring efforts on those areas of greatest interest to hunters, where management issues are most likely to arise, and where changes in management are most likely to have an effect.

Habitat carrying capacity for deer in Unit 2 has diminished because thousands of acres of clear cuts are in, or approaching, the stem exclusion growth stage which provides less forage and critical winter habitat and could lead to habitat conditions that support fewer deer. The U.S.

Forest Service (USFS) manages nearly 80% of the land in Unit 2, much of which has been logged for many years. Since 1954, Prince of Wales Island (POW) has received the most substantial logging activity in Southeast Alaska, which resulted in a 94% reduction in contiguous high-volume old growth forest. By 2004, logging had reduced contiguous forest by 77.5% on northern POW Island. Logging activity reduced deer habitat in north central POW by 46% and in south POW by 18%, and logging and loss of habitat has continued. As of 2018, approximately 360,000 acres of old-growth forest has been harvested on POW; 169,000 acres are currently in the stem-exclusion growth stage; and another 115,000 acres are nearing this stage. Stands in the stem exclusion growth stage are less productive for deer and this habitat is expected to support fewer deer until old-growth conditions and forage return, which will take up to 150 years to reach. Deer densities in logged stands more than 30 years old support 7 deer/km^2 compared to unmanaged old-growth stands which support 12 deer/km^2. Removing important deer wintering habitat has a negative long-term impact on local deer populations.

Deer habitat restoration is a key component to increasing habitat carrying capacity for deer in Southeast Alaska. The department is currently collaborating with the Blacktail Deer Foundation and many other federal, state, and other organizations to improve Sitka black-tailed deer habitat across Southeast Alaska. The Southeast Alaska Habitat Enhancement and Restoration for Deer Stewardship (HERDS) collaboration formed in 2024 to address habitat concerns by constituents across Southeast Alaska. The collaboration finished phase one of a multi-phase project to identify potential watersheds for restoration. Phase two will engage members of the public to help prioritize restoration efforts, and phase three will implement recommended treatments along with monitoring deer use in identified areas.

The harvest strategy and management of wolves in Unit 2 has changed over time. From statehood until 1997 the department managed wolf harvest in Unit 2 through season dates and bag limits. Following several years of high wolf harvest and the 1993 Endangered Species Act (ESA) petition, in 1997 the board adopted a Harvest Guideline Level (HGL) for wolves in Unit 2. The HGL varied between 20–30% of the most recent population estimate from RY1997–RY2018. In 2012 the department initiated a new method of estimating Unit 2 wolf abundance using a spatially explicit capture-recapture (SECR) approach based on identifying individual wolves through DNA in hair captured on an array of scented hair boards distributed throughout northern and central POW (Fig. 1) and in tissue samples from harvested wolves. This method allowed annual population estimates from which the department based allowable harvest from RY2015–present. To address shortcomings in Unit 2 wolf management identified by the department and the public, in 2017, the department began developing a new Unit 2 wolf management strategy. That strategy was developed in consultation with Unit 2 hunters and trappers, Fish and Game Advisory Committees, and the Southeast Federal Subsistence Regional Advisory Council. Through those consultations, the department developed a strategy for managing Unit 2 wolf harvest based on annual harvest opportunity determined from the most recent population estimate, recent harvest rates, and other information to maintain the wolf

population within a fall population objective established by the board.

Federal agencies consider wolves in Southeast Alaska (Units 1, 2, 3, and 5A) and wolves inhabiting coastal British Columbia to be a subspecies of North American wolves known as the Alexander Archipelago wolf (*Canis lupus ligoni*). In 1993, 2011, and 2020 wolves in Southeast Alaska including Unit 2 were petitioned for listing as threatened or endangered under the ESA. Concerns over habitat alteration, harvest management, illegal take, low ungulate prey diversity, inbreeding, and the effects of climate change were potential threats to wolves cited in the petitions. All three petitions were found by USFWS to be not warranted for listing. Within the 2023 ESA "not warranted" decision, wolves in Southeast Alaska were found by USFWS to be a distinct population segment from Alexander Archipelago wolves in coastal British Columbia.

For reference, additional wolf management data and information can be found in the analysis and recommendation for Proposal 48.

Consideration of intensive management for deer in Unit 2 would also include an analysis of predation by black bears. The department altered black bear management in Unit 2 to account for high harvest of this species. Unit 2 is a popular area for nonresident hunters to pursue black bears for a chance at a Boone and Crocket class bear. After averaging 123 bears per year during 1980–1988, and 221 bears annually from 1989–1995, the harvest increased to a yearly average of 329 bears during 1996–2002 (Bethune 2011). During 2003–2007 the annual average harvest increased to 431 bears. Harvest peaked in 2005 at nearly 500 bears (Fig. 3). Black bear harvest by nonresidents in Unit 2 steadily increased over time and during 2006 and 2007 was 89% of the total harvest. The department evaluated the high level of harvest and subsequent decline in harvest after 2005 and the board, at its 2010 meeting, determined a management change was warranted. As a result, a drawing permit hunt for nonresident hunters was established in RY2012 in an effort to reduce Unit 2 hunting pressure. This regulatory action limited the number of nonresident hunters who could participate and the department further distributed harvest by using discretionary authority to split the drawing permit hunt into a fall season (DL027) and a spring season (DL028). Those who did not draw could hunt with a registered guide, and in 2019 the board also allowed nonresidents to hunt with a resident relative within the second degree of kindred with a harvest ticket. Harvest has since stabilized to an average harvest of 209 bears for RY2020–RY2024 and hunters report seeing numerous bears while afield.

Table 1. Deer harvest and hunter effort for Unit 2 in Southeast Alaska for regulatory years 1997 to 2024.

Regulatory Year	Hunters	Days Hunted	Bucks	Does	% Does	Total Harvest	Days per Deer	Deer Per Hunter
1997	1772	10980	1757	70	3.82	1828	6.01	1.03
1998	1948	10425	2357	75	3.08	2432	4.29	1.25
1999	1905	13103	2243	92	3.93	2336	5.61	1.23
2000	1506	10108	1950	55	2.74	2005	5.04	1.33
2001	1926	12050	2686	126	4.48	2812	4.29	1.46
2002	1828	10336	2055	57	2.70	2112	4.89	1.16
2003	1399	8050	1753	71	3.89	1824	4.41	1.30
2004	1392	6695	2036	73	3.46	2109	3.17	1.52
2005	1815	9066	2601	103	3.81	2704	3.35	1.49
2006	2016	9855	3099	98	3.07	3197	3.08	1.59
2007	2000	10528	2760	88	3.09	2848	3.70	1.42
2008	2113	11064	3185	121	3.66	3306	3.35	1.56
2009	2096	11602	3144	110	3.38	3254	3.57	1.55
2010	2244	11791	3486	92	2.57	3578	3.30	1.59
2011	2222	13091	3640	106	2.82	3746	3.49	1.69
2012	2482	12909	3600	96	2.59	3696	3.49	1.49
2013	2489	12561	3600	77	2.10	3678	3.42	1.48
2014	2725	13949	3812	119	3.02	3931	3.55	1.44
2015	2813	14111	4147	96	2.26	4243	3.33	1.51
2016	2688	13408	3451	84	2.37	3534	3.79	1.31
2017	2261	12651	2354	79	3.25	2433	5.20	1.08
2018	1874	9756	2019	60	2.88	2079	4.69	1.11
2019	1737	8653	1908	45	2.30	1953	4.43	1.12
2020	1686	9783	1807	43	2.32	1850	5.30	1.10
2021	1714	8911	1790	34	1.86	1824	4.90	1.06
2022	1633	8187	1654	38	2.25	1692	4.80	1.00
2023	1599	8270	1571	32	2.00	1603	5.20	1.00
2024	1641	7929	1789	20	1.10	1810	4.38	1.10

Table 2. Average number of days a hunter spent to harvest a deer in Southeast Alaska by Unit from regulatory years 2020 to 2024.

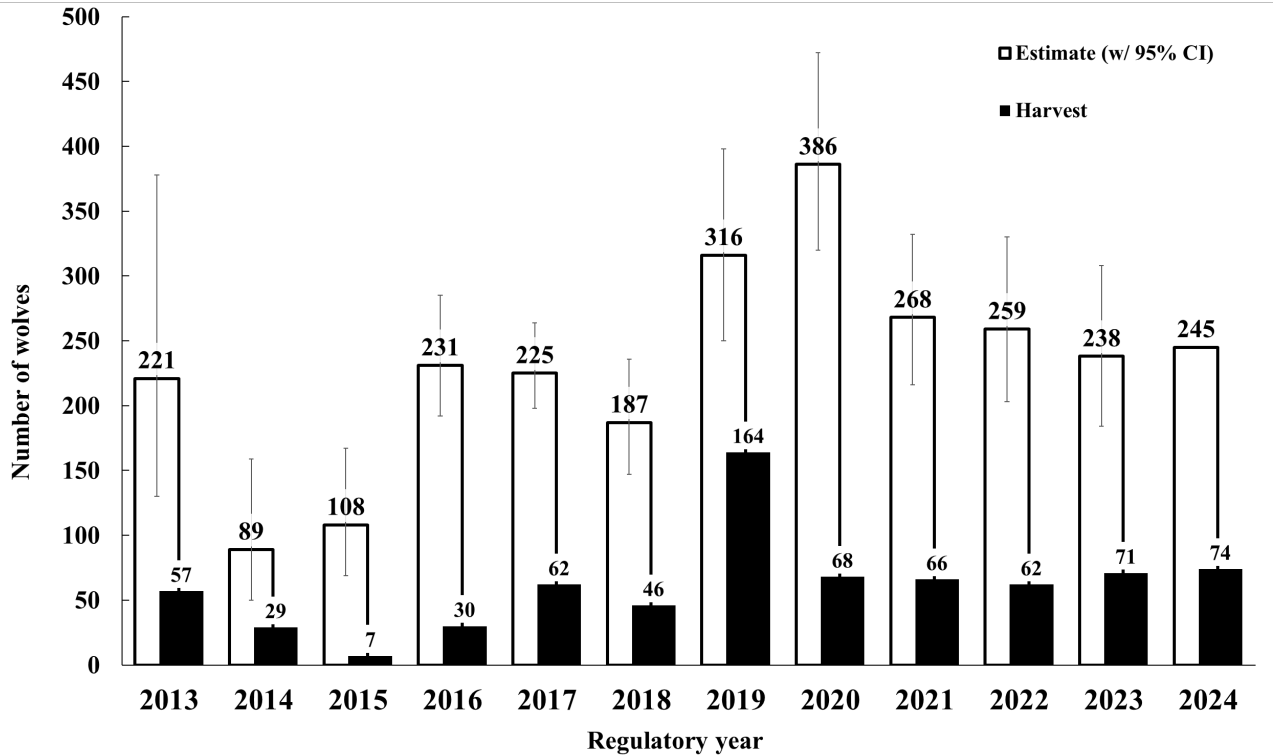| Regulatory year	01A	01B	01C	02Z	03Z	04Z	05A
2020	4.2	6.8	7.2	5.3	5.5	2.5	10.1
2021	3.9	4.9	8.6	4.9	5.3	2	8.7
2022	3.4	8.4	7	4.8	5	2.7	11.3
2023	3.3	19.2	7.4	5.2	4.8	2.4	7.5
2024	3.1	10	6.6	4.4	4	2.5	17.2

Figure 2. Fall wolf population estimates (open bars) and harvest (black bars) for Unit 2. Numbers for wolf estimates indicate the point estimate used for management and whiskers indicate the 95% confidence interval.
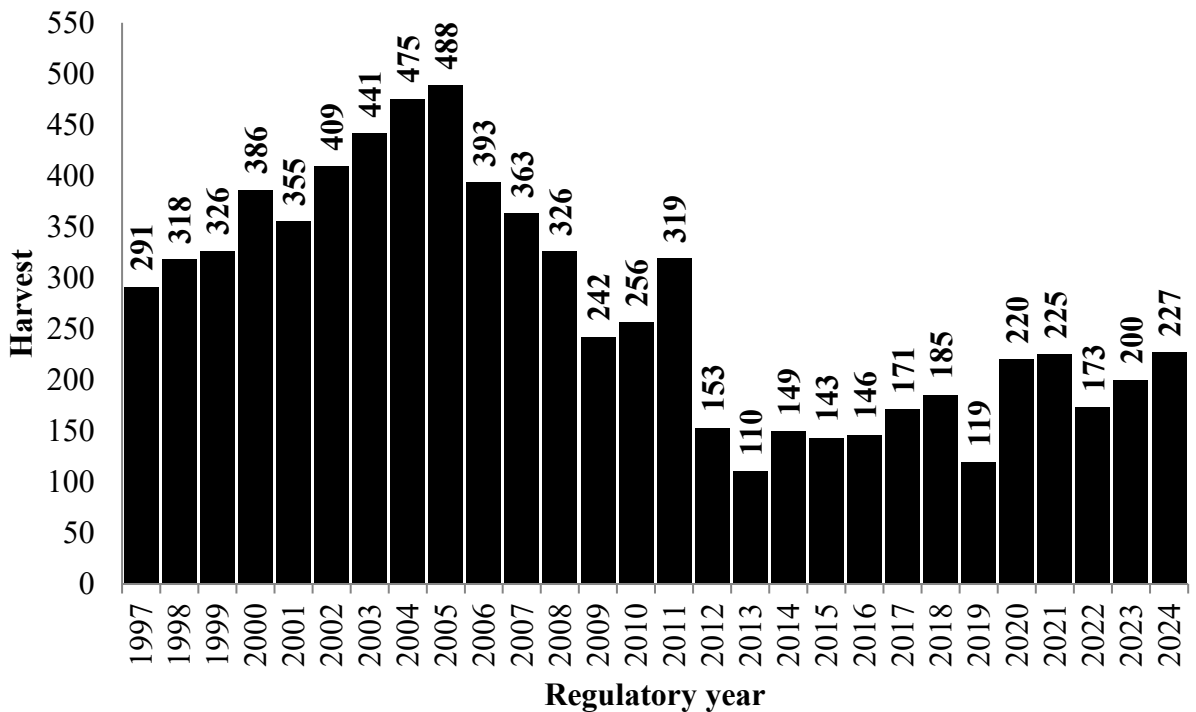

Figure 3. Black bear harvest in Unit 2 from regulatory years 1997 to 2024.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. The department manages wolves for sustained yield and harvest opportunity in Unit 2. There is no question that deer are predated on by both wolves and black bears. However, habitat quality must also be considered among factors limiting deer abundance. It is also well documented that weather is a primary factor impacting Sitka black-tailed deer abundance in Southeast Alaska.

Unit 2 wolves have been the focus of three unsuccessful ESA petitions. A primary reason for the petitions failing is the management strategies employed by the department for Unit 2 wolves. While there is not 100% agreement between the department and resource users on the current strategy, it is biologically appropriate, provides harvest opportunity, and has a level of social acceptance.

Black bears are also a known deer predator, especially for fawn deer. The department also manages this species for sustained yield and harvest opportunity. Over the last ten years black bear abundance indicated a significant decline believed to be due to extensive harvest of female bears. Decreasing age at harvest and skull size suggested changes to bear demographics. The board adopted proposals to reverse this trend resulting in the current harvest opportunity for both resident and nonresident black bear hunters. The department will continue to increase opportunity, specifically for nonresident hunters, as appropriate.

As noted in the Unit 2 overview and this analysis and recommendation, Prince of Wales Island has been heavily logged and many of the cut stands of trees are in, or entering, stem exclusion. This phase of forest growth is detrimental to deer because of the limited browse and forage available and the absence of large trees to intercept snow and provide winter cover. In addition, stem exclusion makes is more difficult for hunters to detect deer and for hunters to access areas due to road closures and overgrown roads and trails. Habitat improvement is necessary for Sitka black-tailed deer abundance to improve in Unit 2.

Should the board adopt this proposal the process to prepare a feasibility study will begin when funding becomes available. Currently no funding is available to initiate this work. The department will provide this report to the board at a future date once funding has been identified and the work can be completed. Following a feasibility study an operational plan will be developed by the department and presented to the board. These steps all occur prior to the department conducting IM operations.

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

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