



**Alaska Department of Fish and Game Comments  
On Wildlife Special Action WSA25-02**

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This special action would close the Sitka black-tail deer doe hunt on federal public lands in Game Management Unit (GMU) 2 for Regulatory Year (RY) 2025, pending whether the final rule establishing Ketchikan as a rural community is published before the end of the RY 2025 deer season in Unit 2.

**Position**

The Alaska Department of Fish & Game (ADF&G) **SUPPORTS** eliminating the doe season in GMU 2 regardless of Ketchikan's rural status taking effect. Hunters in GMU 2 are concerned about the increase in time that it takes to harvest a deer and have submitted multiple proposals to eliminate the doe season during past Federal Subsistence Board (FSB) meetings. For many years GMU 2 residents have urged the FSB to eliminate the doe harvest, yet the FSB has not acted, despite the growing effort required by hunters to harvest deer. Removing the doe harvest would increase deer recruitment and help to increase deer available for harvest. Closure of the GMU 2 doe season, while limiting resident harvest opportunity in the short-term, is expected to result in an overall higher abundance of deer, and therefore increased deer harvest opportunity in the years following the closure.

During the public hearing, ADF&G heard from members of the Southeast Alaska Regional Advisory Council (SERAC) that WSA25-02 cannot be acted upon until all NFQU hunting opportunities are eliminated because of language found in ANILCA. ADF&G understood the comments to mean that the language under Section 804, ". . .the taking on public lands of fish and wildlife for nonwasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes," should be interpreted this way. However, that is not a correct understanding of ANILCA. Section 804 is a general statement that gives a priority to subsistence uses under certain criteria. The rest of Section 804 explains how and when the subsistence priority is to be implemented: "Whenever it is necessary to restrict the taking of populations of fish and wildlife on such lands for subsistence uses in order to protect the continued viability of such populations, or to continue such uses, such priority shall be implemented . . ." as described. Further, Section 815 explains that nothing in Title VIII "shall be construed as - . . . authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on the public lands" except as expressly provided. Federally qualified users who hunt in

GMU 2 already have multiple instances in which they have priority over NFQUs including three more deer in the bag limit, the opportunity to harvest a doe, an extended early season, an extended late season, and a portion of the Unit being closed to FQUs. If the FSB finds that FQUs need to be restricted, the FSB can do so – and has done so - under Title 8 of ANILCA without first prohibiting all opportunities for NFQUs. The FSB has taken similar action in other regions of the state to restrict FQU harvest without executing a complete closure to NFQUs.

### **Background**

The intensive management harvest objective of 2,700 deer established by ADF&G for GMU 2 starting in RY 2000 – although GMU 2 deer harvest was above this objective from 2005 to 2016, harvest has remained below this objective since RY 2017 (Table 1). Conversations with hunters from GMU 2 suggest that harvest opportunity for and access to deer have become more difficult due to a perceived smaller population, and access issues related to logging and forest stand succession. Deer populations are difficult to measure directly via aerial surveys or other methods, so ADF&G uses “catch per unit effort” (CPUE) of deer hunters, measured as the average number of days hunted to harvest a deer, as an index of abundance for the population. However, CPUE is not a direct measure of the deer population size, and multiple other factors may be influencing CPUE, such as hunter access (discussed below). CPUE data indicates that hunters have, on average, been spending an increased amount of time hunting to harvest deer (Fig. 2, Table 1). The average CPUE for deer in GMU 2 from RY 2005 to RY 2016, when harvest was above the intensive management harvest objective, was 3.45 days hunted per deer harvested – conversely, from RY 2017 to RY 2024 when harvest was below this objective, the average CPUE was 4.8 days hunted per deer harvested (Table 1). However, it is unrealistic to expect sustained levels of record harvest that far exceed the intensive management harvest objective that were experienced from ~RY 2008 to RY 2016. In addition, there are fewer hunters, and fewer deer harvested per hunter (Table 1), which also contributes to the decline in harvest. We interpret that the combination of these factors suggests that the Sitka black-tail deer population in GMU 2 has only slightly declined from the higher levels observed a decade ago, yet similar to two decades prior.

**Table 1.** Deer harvest for Game Management Unit 2 in Southeast Alaska for regulatory years 2000–2024. Displayed information includes the number of hunters, the total number of days hunted across all hunters, the number of bucks and does harvested, the percent of harvest attributed to does, total deer harvest, the average number of days hunters spent to harvest each individual deer, and the number of deer harvested per hunter. Averages for 2000 – 2004, 2005–2016, and for 2017 – 2024, are also displayed to show changes in harvest through time.

<b>Regulatory Year</b>	<b>Hunters</b>	<b>Days Hunted</b>	<b>Bucks</b>	<b>Does</b>	<b>% Does</b>	<b>Total Harvest</b>	<b>Days per Deer</b>	<b>Deer/Hunter</b>
<b>2000</b>	1506	10108	1950	55	2.74	2005	5.04	1.33
<b>2001</b>	1926	12050	2686	126	4.48	2812	4.29	1.46
<b>2002</b>	1828	10336	2055	57	2.70	2112	4.89	1.16
<b>2003</b>	1399	8050	1753	71	3.89	1824	4.41	1.30
<b>2004</b>	1392	6695	2036	73	3.46	2109	3.17	1.52
<b>2005</b>	1815	9066	2601	103	3.81	2704	3.35	1.49
<b>2006</b>	2016	9855	3099	98	3.07	3197	3.08	1.59
<b>2007</b>	2000	10528	2760	88	3.09	2848	3.70	1.42
<b>2008</b>	2113	11064	3185	121	3.66	3306	3.35	1.56
<b>2009</b>	2096	11602	3144	110	3.38	3254	3.57	1.55
<b>2010</b>	2244	11791	3486	92	2.57	3578	3.30	1.59
<b>2011</b>	2222	13091	3640	106	2.82	3746	3.49	1.69
<b>2012</b>	2482	12909	3600	96	2.59	3696	3.49	1.49
<b>2013</b>	2489	12561	3600	77	2.10	3678	3.42	1.48
<b>2014</b>	2725	13949	3812	119	3.02	3931	3.55	1.44
<b>2015</b>	2813	14111	4147	96	2.26	4243	3.33	1.51
<b>2016</b>	2688	13408	3451	84	2.37	3534	3.79	1.31
<b>2017</b>	2261	12651	2354	79	3.25	2433	5.20	1.08
<b>2018</b>	1874	9756	2019	60	2.88	2079	4.69	1.11
<b>2019</b>	1737	8653	1908	45	2.30	1953	4.43	1.12
<b>2020</b>	1686	9783	1807	43	2.32	1850	5.30	1.10
<b>2021</b>	1714	8911	1790	34	1.86	1824	4.90	1.06
<b>2022</b>	1633	8187	1654	38	2.25	1692	4.80	1.00
<b>2023</b>	1599	8270	1571	32	2.00	1603	5.20	1.00
<b>2024</b>	1641	7929	1789	20	1.10	1810	4.38	1.10
<b>Avg: 2000 - 2004</b>	1610.20	9447.80	2096.00	76.40	3.52	2172.40	4.35	1.35
<b>Avg: 2005 - 2016</b>	2308.61	11994.48	3377.10	99.08	2.85	3707.38	3.45	1.51
<b>Avg: 2017 - 2024</b>	1768.11	9267.54	1861.49	43.85	2.30	1905.46	4.86	1.08

Deer habitat has been impacted in GMU 2 from a long history of logging. The historic and ongoing commercial logging legacy on GMU 2 lands has altered deer habitat and hunter access. POW received the most substantial logging activity in the region since 1954, which resulted in a 94% reduction in contiguous high-volume forest. Contiguous forest has been reduced by 77.5% in the northern Prince of Wales (POW)biogeographical region. This logging activity reduced

deer habitat in north central POW by 46% and in south POW by 18%. Logging associated road building in GMU 2 has created the highest density of roads in Southeast Alaska, with approximately 2,500 miles (4,000 km) of drivable roads. The harvest of old-growth forest is expected to impact deer populations in multiple ways. Clearcut logging can result in abundant ground-level forage for deer and other species in the years immediately following the clearcut. Studies show deer tend to select habitats with higher understory growth, providing forage that maintains or improves body condition. However, the initial flush of vegetation is succeeded by a “stem exclusion” phase that is largely unproductive for many species including deer and can last for 150 years or longer. As of 2018, approximately 360,000 acres of old-growth has been harvested on POW, 169,000 acres are currently in stem-exclusion stage and another 115,000 acres are close to this stage. Additionally, old-growth forests are important deer wintering habitat. Deer seek refuge from deep snow by occupying uneven-aged old-growth forests, which intercept falling snow in the canopy and retain important ground-level forage. Furthermore, snow depth has been shown to be a primary factor influencing deer population size in Southeast Alaska, where years with deep snow that persists into spring limit forage availability and result in deer winter mortality. Studies have demonstrated that deer densities in managed lands logged >30 years ago support 7 deer/km<sup>2</sup> compared to unmanaged land with 12 deer/km<sup>2</sup>. Removing important deer wintering habitat has a negative long-term impact on local deer populations and may have contributed to the reduced measures of the deer population observed in recent years.

To address the habitat issues there is a collaborative effort amongst state and federal agencies, landowners, non-government organizations and individuals to improve deer habitat in GMU 2 and across Southeast Alaska. The Southeast Alaska Habitat Enhancement and Restoration for Deer Stewardship (HERDS) group was formed out of the 2022 Deer Summit on POW to better understand issues surrounding habitat conditions and the deer population. Its goal is to support collaborative, landscape-level conservation and restoration of Sitka black-tailed deer habitat by informing wildlife and land management decisions and coordinating efforts to benefit local deer populations, hunters, and communities. One issue identified from the Summit was how the increasing amount of second growth entering stem-exclusion is limiting deer populations and hunter access. Recognizing this limiting factor, the then Mule Deer Foundation and now Blacktail Deer Foundation secured funding from the U.S. Forest Service to work on these areas to enhance deer habitat. That work has begun on POW and in other areas within Southeast Alaska.

Logging can impact hunter access in multiple ways. The development of logging roads to access timber harvest units increases hunter access and hunter opportunity. However, once clearcuts are 10–15 years old, hunters tend to avoid clearcuts as they become difficult to travel through and to see deer. Moreover, logging roads become overgrown with time and access decreases. The succession of clearcut forests may be contributing to the increased effort required for GMU 2 hunters to harvest deer, and further impacting indices that biologists use to track deer populations.

Although the proportion of does harvested remains relatively low compared to overall harvest (around 2.5%; Table 1), removing any female deer from the population will reduce the number of reproductively active females contributing to the population. Furthermore, public comments by GMU 2 residents at the Unit 2 Deer Summit in 2022 suggested that actual doe harvest by

GMU 2 residents may be higher than what has been reported. A natural first step for wildlife managers seeking to increase deer populations is to close female harvest seasons with the goal of increasing the number of reproductively active females that can contribute to the population. By closing the doe season, it is expected that there will be more reproductively active females producing fawns, which is in turn expected to result in population growth and eventually greater harvest opportunity.

Part of the justification for this proposed closure is based on the thought that “thousands” of Ketchikan residents would hunt in GMU 2 once Ketchikan is recognized as a rural community. The most Ketchikan residents that hunted in GMU 2 during a regulatory year was in RY 2015 when 784 Ketchikan hunters pursued deer in GMU 2. Recently, GMU 1A hunters have had increased harvest success. In RY 2024, GMU 1A hunters experienced the highest level of deer harvest ever recorded (1085 deer) and a low average number of days to harvest a deer (3.11 days per deer) in subunit 1A. Relatively few people in GMU 1A harvest more than 2 deer suggesting few hunters have the need to travel to GMU 2 for additional deer. These trends suggest that deer populations in GMU 1A are robust and provide Ketchikan residents with ample opportunity for deer harvest within their home unit. It seems unlikely that “thousands” of Ketchikan residents will look to hunt deer in GMU 2, where CPUE is higher and deer populations are thought to be lower, when total harvest and harvest effort have been more favorable in GMU 1A.

Currently, there are multiple proposals submitted asking the FSB to remove the GMU 2 doe season. This is a continuation of proposals drafted by GMU 2 residents to remove the doe season, such as WP20-03 submitted by the East Prince of Wales Advisory Committee to the FSB for the 2020–2022 season. Residents of GMU 2 commonly asked for the removal of the doe season in the comments section of hunt reports submitted to ADF&G in the 1990s, and ADF&G is starting to see this again, along with direct comments over the phone and in person. There are signs posted on message boards in GMU 2 urging residents to avoid harvesting does. Despite the clear opposition of many GMU 2 residents to the continuation of a doe hunt, the FSB has not taken action to remove it. The state removed the doe harvest in GMU 2 in RY1978 in an effort maximize the bucks available for harvest. Aligning the state and federal regulations by removing the doe harvest should increase recruitment, simplify regulations, and follows through on a request from hunters.

### **Impact on Federally Qualified Users**

If adopted, this closure would limit the ability of FQUs to harvest female deer. However, the overall bag limit for subsistence users in GMUs 1–5 to harvest deer in GMU 2, as the total bag limit would remain at 5 deer and would be changed to be male-only.

The anticipated long-term benefits of closing the doe season are expected to outweigh the immediate reduction in harvest opportunity by increasing the deer population, resulting in larger deer populations and greater opportunity for subsistence and non-subsistence users to harvest deer in GMU 2.

### **Impact on Other Users**

If adopted, this closure would have no impact on non-subsistence users. Currently, only Alaska residents of rural communities from GMUs 1–5 are allowed to harvest does in GMU 2. Residents of non-rural communities, as well as non-residents, are unable to harvest does in GMU 2.

### **Opportunity Provided by State**

**State customary and traditional use findings:** The Alaska Board of Game (BOG) has made a positive customary and traditional use findings for Sitka black-tail deer in GMU 2.

**Amounts Reasonably Necessary for Subsistence:** Alaska state law requires the BOG to determine the amount of the harvestable portion of a wildlife population that is reasonably necessary for customary and traditional uses. This is an ANS. The BOG does this by reviewing extensive harvest data from all Alaskans, collected either by ADF&G or from other sources.

ANS provides the BOG with guidelines on typical numbers of wildlife harvested for customary and traditional uses under normal conditions. Hunting regulations can be re-examined if harvests for customary and traditional use consistently fall below ANS. This may be for many reasons: hunting regulations, changes in wildlife abundance or distribution, or changes in human use patterns, just to name a few.

The ANS for Sitka black-tail deer in GMU 2 is 1500–1600 animals. The season and bag limit for Sitka black-tail deer in GMU 2 is August 1 – December 31 with a bag limit of 4 bucks.

### **Conservation Issues**

If adopted, this closure is not anticipated to result in any conservation issues. The closure of the doe season in GMU 2 is expected to contribute to increasing the overall deer population through time.

### **Enforcement Issues**

If adopted, this closure is not anticipated to result in enforcement issues, and changes to the federal subsistence regulations should be communicated to Alaska residents of GMUs 1–5 hunting in GMU 2 to avoid confusion and illegal harvest. Changing the bag limit to “5 bucks” may cause some confusion if hunters attempt to take deer they identified as male, but that have shed their antlers. Bucks tend to shed their antlers in late December and January, so ADF&G suggests changing the language of the proposed regulation to “5 antlered deer,” or to restrict the season to end on December 31<sup>st</sup>.