

Alaska Department of Fish and Game Comments

Wildlife Proposals WP26-04 and WP26-05

These proposals request various actions be taken regarding the hunting of Sitka black-tailed deer (deer) in Game Management Unit (GMU) 2. WP26-04 requests that a Section 804 user prioritization analysis be conducted and then federally qualified users (FQU) be restricted by the outcome of that analysis. WP26-05 makes a similar request as WP26-04 but specifically requests that the Section 804 analysis be used to restrict FQUs not living in GMU 2 to be restricted to a 2 deer bag limit with no doe harvest.

Position

The Alaska Department of Fish & Game (ADF&G) **OPPOSES** these proposals because there are no justifications under the Alaska National Interest Lands Conservation Act (ANILCA) for the Federal Subsistence Board (FSB) to approve these restrictions. If enacted, it would unnecessarily deprive FQUs from outside GMU 2 of sustainable deer hunting opportunity contrary to terms in Title VIII of ANILCA. Currently, FQUs from GMUs 1-5 are allowed to hunt under federal regulations for deer in GMU 2. FQUs have indicated that there have been impacts to their ability to carry out subsistence harvest of deer from GMU 2. However, measures of subsistence have never been federally defined and until that occurs it is not possible to measure impacts to subsistence. What ADF&G has been able to measure is the number of hunters and harvest, which have fluctuated through time. Levels of harvest and the number of hunters in regulatory years (RY) 2017–RY2024 are similar to those in RY1997–RY2004, but lower than the high harvest from RY2005–RY2015 which resulted in a record number of hunters and harvest in RY2015. It is not a realistic expectation that deer populations be managed for the record harvest numbers observed in and around RY2015. The catch per unit effort (CPUE) measure that ADF&G uses, calculated as the number of days hunted to harvest a deer, is our best index to measure the size of the deer population. The CPUE from RY2016–RY2024 is similar to values observed from RY1997–RY2004, and there were no restrictions needed at that time to NFQUs or FQUs from outside GMU 2 for the population to recover and grow to the point of the record harvest in RY2015.

Background

NFQUs are currently restricted to a lower bag limit and a shorter season than FQUs. The bag limit restriction put in place in RY2018 reduced NFQU hunting participation for deer in GMU 2. NFQUs are currently restricted by both a smaller bag limit and are restricted from hunting federal public lands on most of GMU 2 between 1 August and 15 August. Additional opportunities are also provided to FQUs with an extended season including July 24–July 31 and the month of January when NFQUs cannot hunt. Overall, FQUs have more opportunity compared to NFQUs with a greater bag limit, ability to hunt does, and the longest deer season in Alaska from July 24–January 31. There are more opportunities afforded Unit 2 Federally qualified deer hunters than any other hunt in Alaska.

Effort to harvest a deer in GMU 2 increased from RY2016–RY2023 but is similar to the past. There was a slight decline (less effort to harvest a deer) in RY2024. The average number of days it took to harvest a deer from RY2017–RY2023 was similar to RY1997–RY2003 at around 5 days per deer (Fig. 1). No closure to NFQUs of FQUs outside GMU 2 was implemented at that time,

and harvest increased from RY2005 to the record high in RY2015. CPUE increases from RY2016 to present, but harvest is down due to fewer hunters. The reported number of hunters has declined from 2818 in RY2015 to 1641 in RY2024, resulting in a substantial decrease in deer harvest (Figs. 2 and 3). The number of NFQUs hunting in GMU 2 decreased from 1755 in RY2015 to 678 in RY2024 (Fig. 2). The number of resident hunters from outside GMU 2 also decreased from 1326 in RY2015 to 568 in RY2024.

Many factors including habitat, predation, disease, harvest, and others influence the GMU 2 deer population and natural fluctuations in the population should be expected. Habitat carrying capacity for deer in GMU 2 has diminished as hundreds of thousands of acres of aged clear cuts are in, or approaching, the stem exclusion growth stage, which provides less forage and supports fewer deer. A long history of logging has influenced deer abundance in GMU 2. Prince of Wales Island (POW) received the most substantial logging activity in the region since 1954, which resulted in a 94% reduction in contiguous high-volume forest and reduced contiguous forest by 77.5% in the northern POW biogeographical region as of 2004. This logging activity reduced deer habitat in north central POW by 46% and in south POW by 18%; percentages which have continued to increase since 2004. 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. As of 2018, approximately 360,000 acres of old-growth has been harvested on POW, 169,000 acres are currently in the stem-exclusion stage, and another 115,000 acres are close to this stage. Stands in the stem exclusion stage are less productive for deer for 150 or more years. This habitat supports fewer deer until old growth conditions and forage return. Deer densities in logged stands more than 30 years old support 7 deer/km² compared to unmanaged old growth stands which support 12 deer/km². 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.

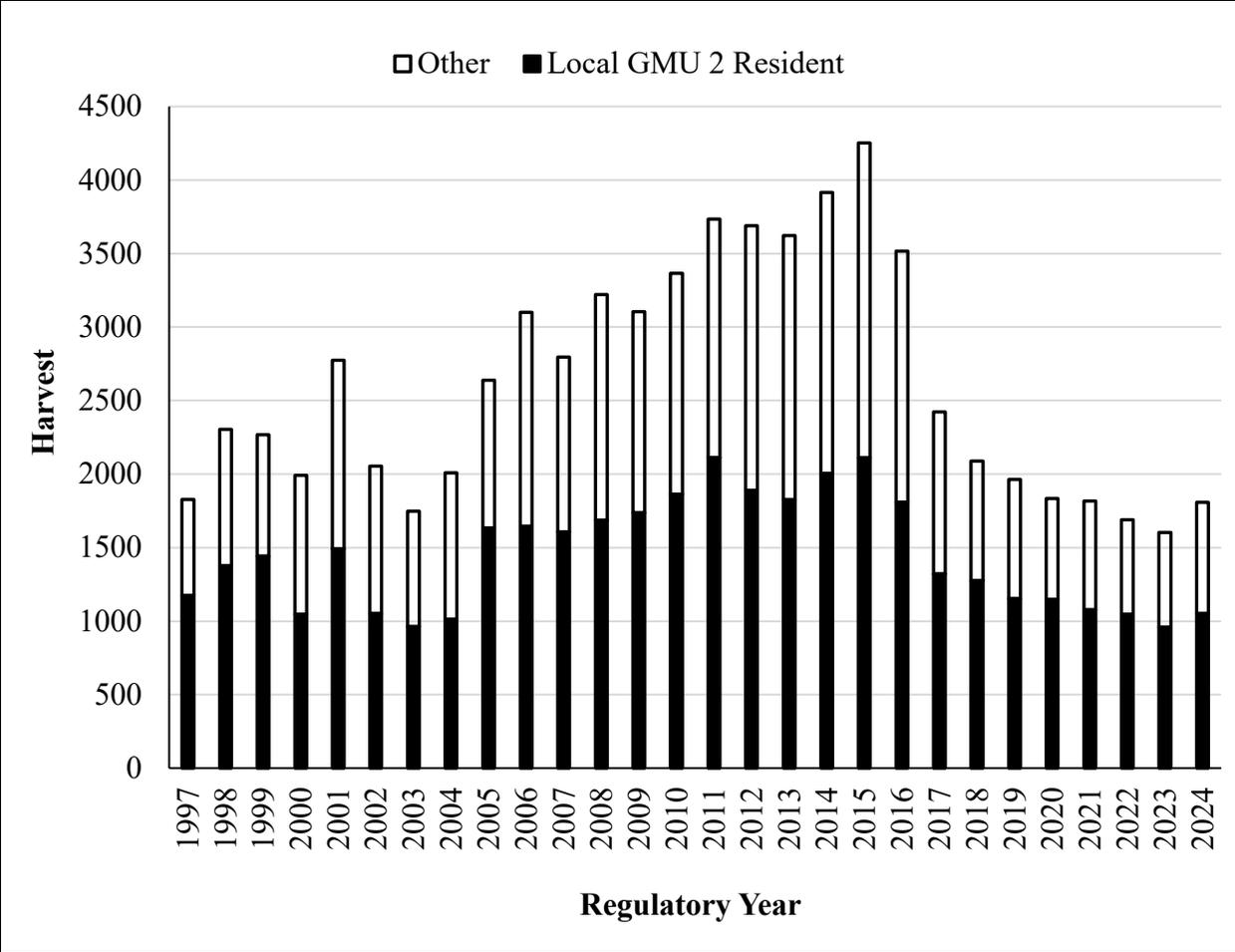


Figure 1. Harvest of deer in Game Management Unit (GMU) 2 by residents of GMU 2 and all other hunters from regulatory years 1997–2024.

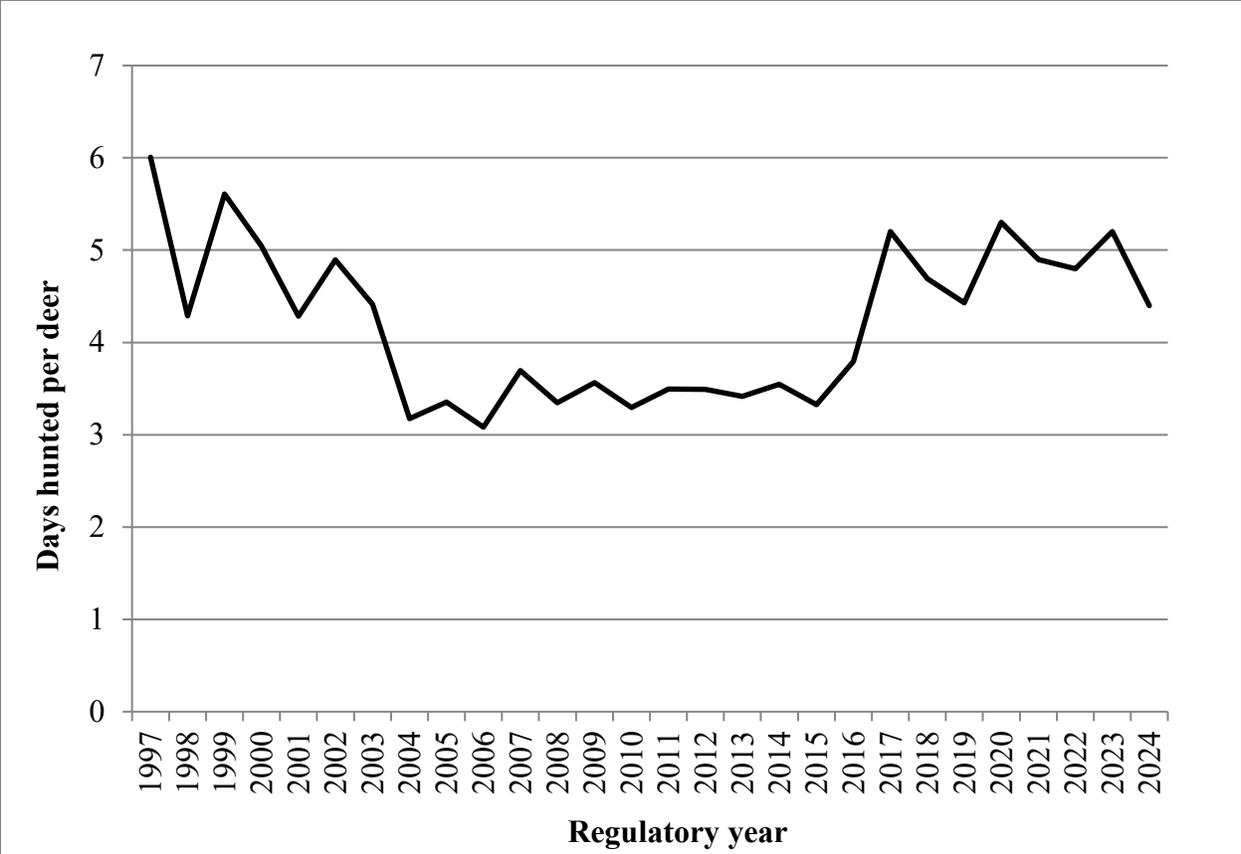


Figure 2. The average number of days it took a hunter to harvest a deer in Game Management Unit 2 from regulatory year 1997–2024.

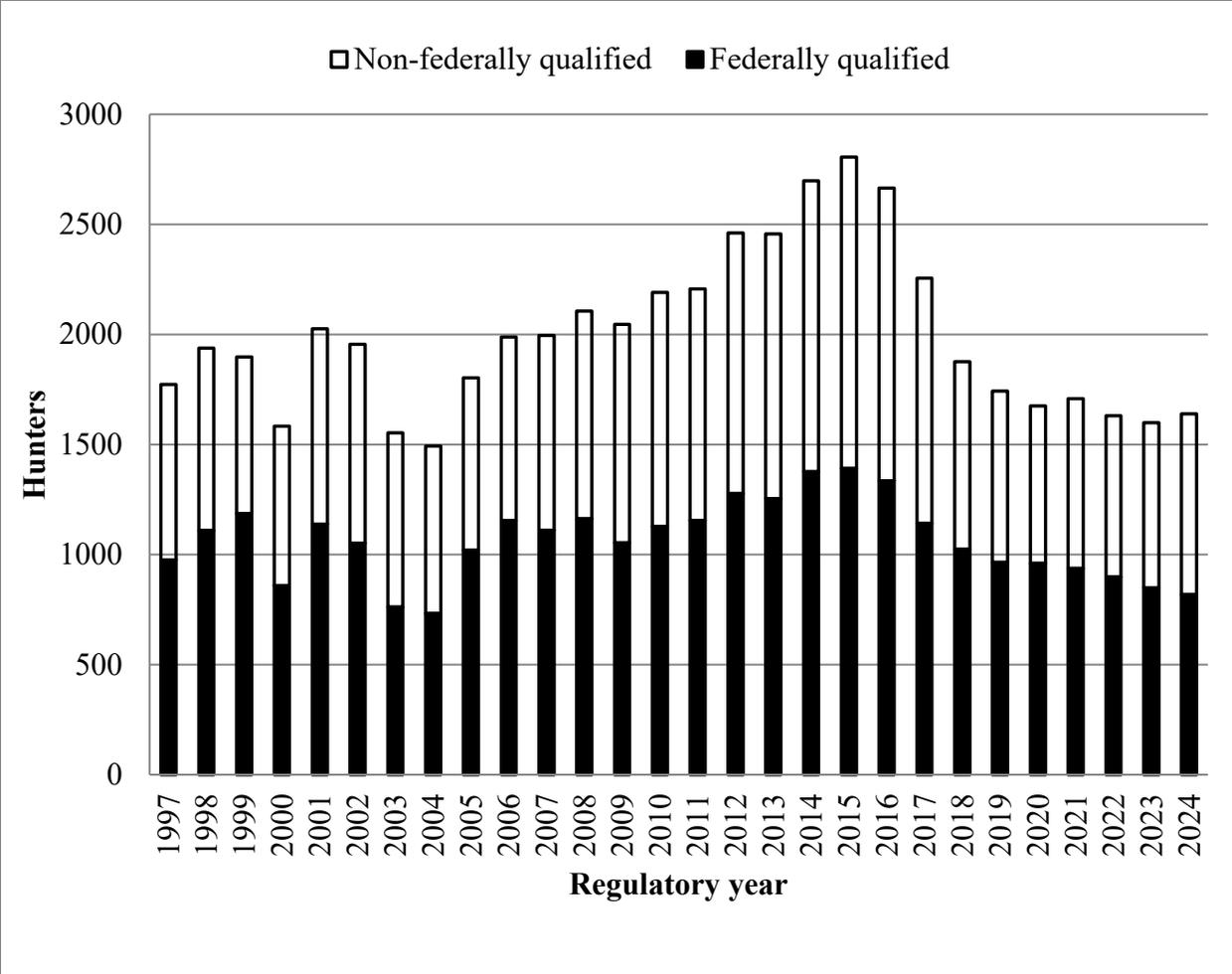


Figure 3. The number of federally qualified users (black bar) and non-federally qualified users (white bar) hunting for deer in Game Management GMU 2 during regulatory years 1997–2024.

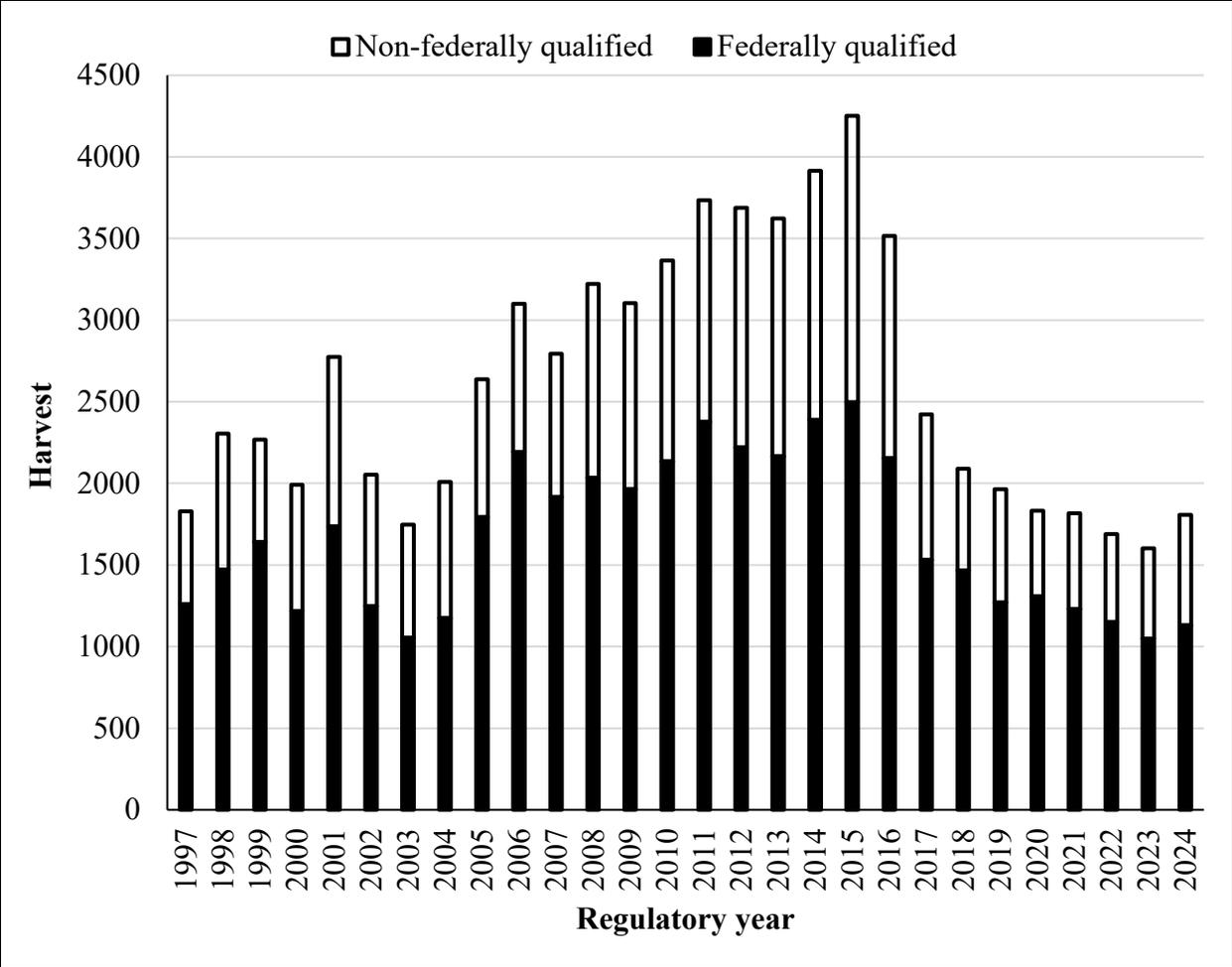


Figure 4. Game Management Unit 2 deer harvest by federally qualified (black bar) and non-federally qualified (white bar) users hunting during regulatory years 1997–2024.

Impact on Federally Qualified Users

If adopted, neither of these restrictions will make a likely difference for the FQUs who would still be able to hunt in GMU 2. What they will do is impact long standing hunting heritage in the area. Hunting is steeped in tradition, family and friends, who visit from outside GMU 2 will not be able to participate in the tradition as they have been able to in the past and those traditions will be broken. Hunters who are now restricted from hunting for deer in GMU 2 would not be able to share meat with local residents from deer harvested in GMU 2. Hunting would still be an option for those FQUs on non-federal lands which would only serve to increase pressure and competition there. Non-federal lands surround many communities in GMU 2. Local GMU 2 hunters typically hunt close to home and could increase competition for deer near communities, thereby increasing conflicts.

Impact on Other Users

If adopted, this may impact other users as FQUs now prohibited from hunting on federal public land would seek opportunities in GMU 2 on state and private land hunting under state regulations increasing competition.

Opportunity Provided by State

State customary and traditional use findings: The Alaska Board of Game (BOG) has made a positive customary and traditional use finding for 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 deer in Unit 2 is 1,500–1,600 deer. The season and bag limit for deer is August 1–December 31 with a bag limit of 4 bucks.

<u>Unit/Area</u>	<u>Bag Limit</u>	<u>Open Season (GD000)</u>	
		<u>Resident^a</u>	<u>Nonresident</u>
02Z	4 bucks	1 Aug.–31 Dec. (Harvest ticket)	1 Aug.–31 Dec (Harvest ticket)

^a Subsistence and General Hunts.

Conservation Issues

There are no conservation issues currently and the passage of this closure will have little measurable impact on the deer population in GMU 2. CPUE increased, however, indices of abundance have trended up and down through time while state management remained consistent.

During the last period of seemingly lower deer abundance in the late 90s to early 2000s, the Southeast Regional Advisory Council held GMU 2 deer subcommittee meetings to discuss management options to increase deer abundance and harvest. Ultimately, the subcommittee did not suggest any major changes to deer management yet harvest in GMU 2 increased from 2005 to a record in 2015.

Enforcement Issues

If adopted, either of these restrictions would only serve to increase the complexity in the way in which FQUs and NFQUs hunt in GMU 2 which would only increase the need for consistent communication and federal law enforcement presence.