

## Alaska Department of Fish and Game Comments

### **Wildlife Proposals WP26-05, 06, and 07**

A portion of WP26-05 requests that federally qualified users (FQU) not from Game Management Unit (GMU) 2 be restricted from harvesting Sitka black-tail deer (deer) does. Proposals WP26-06 and 07 both request eliminating the harvest of does by FQUs in GMU 2.

### **Position**

The Alaska Department of Fish & Game (ADF&G) **SUPPORTS** eliminating the doe season in GMU 2 for all user groups to increase harvest opportunity in the long term. 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. The State removed the doe harvest in GMU 2 in regulatory year (RY) 1978 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 repeated request from GMU 2 residents. 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.

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. 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.

### **Background**

The Board of Game (BOG) established an intensive management harvest objective of 2,700 deer for GMU 2 in RY2000. GMU 2 deer harvest was above this objective from RY2005–RY2016, harvest has remained below this objective since RY2017 (Table 1). The average number of days it took to harvest a deer in GMU 2 from RY2005–RY2016 was 3.45 days hunted per deer harvested. Conversely, from RY2017–RY2024 the average number of days to harvest a deer was 4.80 days (Table 1). There were fewer hunters, and fewer deer harvested per hunter, which also contributes to the decline in harvest. Harvest has declined from the higher levels observed a decade ago but is similar to levels from RY1997–RY2003. From RY1997–RY2003, the average time it took to harvest a deer was about 5 days, which is similar to RY2017–RY2024.

**Table 1.** Deer harvest for Game Management Unit 2 in Southeast Alaska for RY1997–RY2024. 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 reported 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.

<b>Regulatory Year</b>	<b>Hunters</b>	<b>Days Hunted</b>	<b>Bucks</b>	<b>Does</b>	<b>Percent Does</b>	<b>Total Harvest</b>	<b>Days per Deer</b>	<b>Deer/Hunter</b>
1997	1773	10983	1758	71	3.88	1828	6.00	1.00
1998	1937	10319	2238	67	2.91	2305	4.50	1.20
1999	1898	12707	2186	83	3.66	2268	5.60	1.20
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

**Impact on Federally Qualified Users**

If adopted, any of these proposals would limit the ability of FQUs to harvest does. 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 greater opportunity for all hunters to harvest deer in GMU 2.

**Impact on Other Users**

If adopted, this closure would have no impact on other users. Currently, only rural Alaskan 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 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.

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

<sup>a</sup> Subsistence and General Hunts.

## **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.