

Alaska Department of Fish and Game Comments

Wildlife Proposal WP26-15

This proposal would close Federal public lands on Hawkins Island and Hinchinbrook Island in Game Management Unit (GMU) 6D to deer hunting by non-federally qualified users (NFQU).

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 this restriction. If enacted, they would unnecessarily deprive NFQUs of sustainable deer hunting opportunity contrary to terms in Title VIII of ANILCA which states closures can only occur when necessary for the conservation of healthy wildlife populations or to continue subsistence uses. There is not a conservation concern nor is the continuation of subsistence uses being impacted.

Background

Sitka black-tailed deer were introduced to GMU 6 between 1916 and 1923 (Paul 2009). Although GMU 6 is the northern limit of their range, the mild, maritime climate in Prince William Sound (PWS) is similar to that of their natural range in coastal southeast Alaska and has allowed the population to thrive and expand throughout PWS (Reynolds 1979). However, the relative lack of big tree old growth forest and more frequent cold, snowy winters result in more extreme population fluctuations than in their native range (Westing 2022, Jackson *et al.* 2023). The breeding season typically begins in late October and peaks in late November (Shoen and Kirchhoff 2007).

The State management objectives for deer in GMU 6 include (Westing 2022):

- Population of 24,000-28,000 deer.
- Harvest of 2,200 to 3,000 deer.
- When deer pellet transects indicate that the population is low, the 3-year average buck harvest should be >60% of the harvest. Harvest opportunity will be reduced if snow levels are identified as deep and persistent.
- If deer pellet transects find mean pellet groups per plot are >1.5 for 3 consecutive years, education efforts will focus on increasing doe harvest. Board of Game action may be pursued to liberalize deer harvest.

Sitka black-tailed deer occupy a variety of habitats in coastal Alaska. Throughout the year and depending on climate and weather patterns, they may occupy beaches, muskegs, low and mid-elevation forests, and alpine tundra (Schoen and Kirchhoff 2007). Big tree old growth forest habitat with a closed canopy and well developed understory is critical winter habitat for Sitka black-tailed deer, particularly in years with deep snowpack (Jackson et al. 2023).

Prince William Sound experiences heavy snow events and periods of deep cold more frequently than Southeast Alaska. It also has fewer stands of cedar and shorter, smaller diameter spruce and hemlock. Populations of deer in winters basically expand and disperse into less favorable habitat during periods of mild winters but then experience steep declines during severe winters (Reynolds

1979, Crowley 2011). Deep snow concentrates deer on the beaches where they experience high harvest rates if the deep snow conditions occur during the harvest season, potentially compounding the effects on the population (Westing 2022). Deep snow and high harvest during the winter of 2011/12 resulted in an estimated mortality of 50% - 70% of the Prince William Sound deer population (Westing 2014). The winter of 2024/25 was warm and mild however the previous 5 winters had average or above average late winter snowpack (Westing 2024). These snowy winters correlate with modest declines in the PWS deer pellet index (Figure 1). As there are no estimates of deer abundance in the GMU, the deer pellet survey is used as an index of the deer population.

Most deer harvest on Hawkins and Hinchinbrook Islands is by FQSUs. Between 2015 and 2024, 72.9% of all deer harvested on the two islands were harvested by FQSUs, and 70.2% of all deer harvested were by residents of Cordova specifically. The remaining 2.7% of deer harvested by FQSUs were by residents of 34 other rural communities. Of the 27% of deer harvested by NFQUs, 0.9% were harvested by non-residents, and 26.2% were harvested by non-rural Alaskan residents. In 2024, 66.3% of the deer harvested from the two islands were harvested by residents of Cordova. During the 2023/2024 hunting season, the GMU 6D harvest rate was 0.8 deer per hunter, which was down from the 10-year average of 1.1 deer per hunter.

Impact on Federally Qualified Users

If adopted, federally qualified users would not see the improvement to their hunting opportunity they feel this closure would do given there are pieces of private land as well as state public land below ordinary high water that NFQUs will still have the opportunity to harvest deer in GMU 6D.

Impact on Other Users

If adopted, NFQUs would have dramatically less opportunity to hunt for deer in GMU 6D.

Opportunity Provided by State

State customary and traditional use findings: The Alaska Board of Game (BOG) has made positive customary and traditional use findings for deer in GMU 6.

Amounts Reasonably Necessary for Subsistence: Alaska state law requires the BOG to determine the amount of the harvestable portion of a game 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.

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

The ANS for deer in GMU 6 is 1,000-1,250 animals. The season and bag limit for is:

The season for resident and nonresident hunters was 1 August–31 December. The bag limit was 5 deer for residents and 4 for nonresidents. Female deer could be taken beginning 1 October.

Conservation Issues

There are no conservation issues associated with this proposal regardless of its passage.

Enforcement Issues

Hawkins and Hinchinbrook Islands are not entirely federal public land. This creates challenges determining land ownership and residency. It will be up to federal law enforcement to enforce the closure.

References

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