

**ALASKA DEPARTMENT OF FISH AND GAME**  
**STAFF COMMENTS FOR PROPOSALS 43 and 49-51**  
**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 43 – 5 AAC 85.030. Hunting seasons and bag limits for deer.** Increase the season length and bag limit for deer on a portion of the Cleveland Peninsula in Unit 1A.

**PROPOSED BY:** Alaska Department of Fish and Game

**WHAT WOULD THE PROPOSAL DO?** This proposal would increase the resident and nonresident deer hunting season length by 1 month to end December 31 and increase the bag limit from 2 bucks to 4 bucks on the southern portion of the Cleveland Peninsula in Unit 1A. It would also align the season length and bag limit with the rest of Unit 1A.

**WHAT ARE THE CURRENT REGULATIONS?**

**5 AAC 85.030.** Hunting seasons and bag limits for deer.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(1)		
Unit 1 (A) That portion of the Cleveland Peninsula bounded by an east-west line from Yes Bay to Santa Anna Inlet.	Aug. 1 – Nov. 30	Aug. 1 – Nov. 30
2 bucks		

There is a positive intensive management finding for deer in Unit 1A with population objective and harvest objective of 15,000 and 700, respectively.

There is a positive customary and traditional use finding for deer in Unit 1A, outside of the Ketchikan Nonsubsistence Area, and an amount reasonably necessary for subsistence of 5–40 deer.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If the proposal were adopted, residents and nonresidents would have a greater hunting opportunity in Unit 1A, and deer harvest would likely increase.

**BACKGROUND:** The southern portion of the Cleveland Peninsula in Unit 1A (Cleveland, Fig. 1) had the same deer bag limit as the Unit 1A remainder from statehood until the Board of Game (board) reduced the bag limit from 4 bucks to 2 bucks during their 2008 meeting for conservation purposes. Decreasing harvest, fewer hunters, and pellet group counts indicated a decrease in the deer population. The state proposed reducing the bag limit to help the deer population recover and prevent overharvest.

During the next board cycle for the Southeast Region in 2010, the board reduced the season length for deer in Unit 1A remainder and the Cleveland Peninsula by one month, changing the end of the season from 31 December to 30 November. This action was in response to continued concerns about the deer population throughout Unit 1A at the time. During the 2023 board meeting, the board adopted a proposal to revert the Unit 1A remainder season back to Aug. 1 – Dec. 31, but the proposal did not include the Cleveland Peninsula. The department analysis for the 2023 board meeting suggested this increase in season length would not cause biological concern for the deer population, citing recent increases in indices of abundance and a conservative harvest strategy of bucks only.

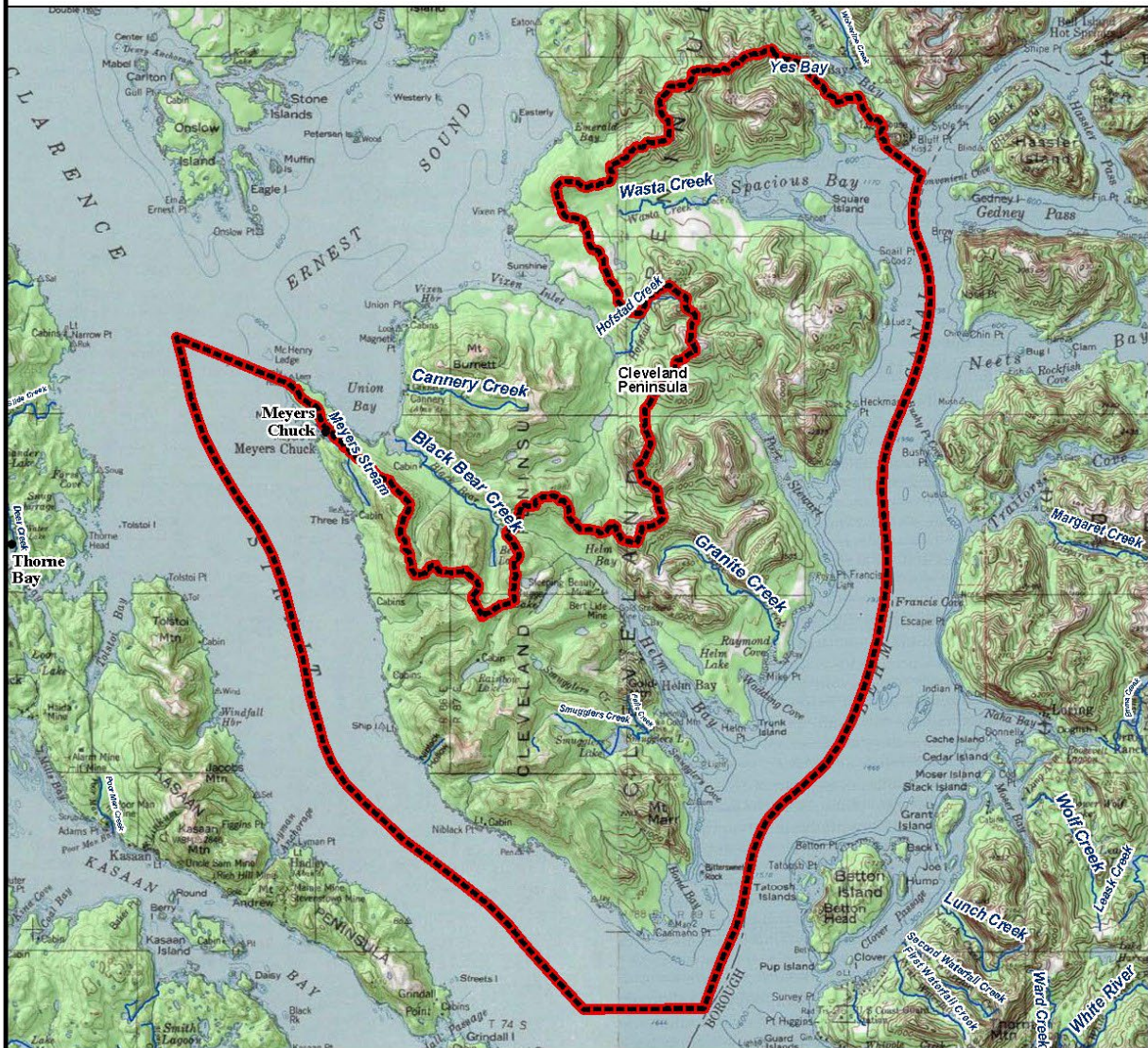
Prior to 2021, department biologists used surveys of mean pellet groups per plot as an index of abundance. Helm Bay is one of two areas surveyed on the Cleveland Peninsula with the most consistent years of data collection. Pellet data from 1988-1995 indicated that the deer density in Helm Bay on the Cleveland Peninsula was moderate (mean pellet groups per plot of 1.00–1.99) during this time (Fig. 2). This was followed by a decrease in deer density to the very low category of the index ( $<0.50$ ) in Helm Bay from 2001–2017 due to severe winters from 1995–1998. Average pellet groups per plot trended slightly upward on the southern end of the peninsula in the Helm Bay area from 2015 – 2019. This increasing trend could indicate an increase in deer density in the Helm Bay area although it is difficult to determine based on this data due to the course output of this data. Pellet data must be interpreted with caution as they are best suited to determine large changes ( $\pm 30\%$ ) in deer populations. Pellet transects were discontinued throughout Southeast Alaska after 2020 due to the coarse information they provided and ADF&Gs pursuit of testing a new camera based method for population trend information.

Similar to the increase in average pellet counts on the Cleveland Peninsula, hunter harvest has increased in all of Unit 1A. On the Cleveland Peninsula, harvest and the number of hunters increased from regulatory year (RY) 2015 – RY2024 (Fig. 3). In RY2015, 21 hunters harvested 15 deer (.71 deer/hunter). This contrasts with data from RY2024 when 80 hunters harvested 77 deer (.96 deer/hunter). Harvest effort data suggest that it may be getting easier to harvest deer in the area, The average time it took to harvest a deer on the Cleveland Peninsula from RY2015–RY2024 decreased from a high in RY2017 of 8.75 days/deer to 2.8 in RY2024, suggesting a possible increase in deer abundance. This potential apparent increase in the deer population on the Cleveland Peninsula is similar to patterns in the rest of Unit 1A.

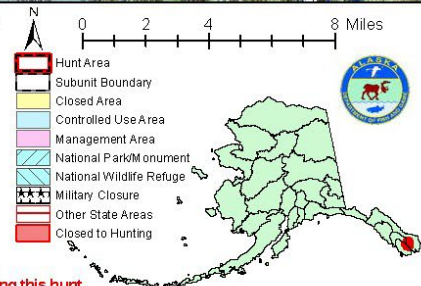
Total deer harvest for all of Unit 1A surpassed the intensive management objective of 700 deer in RY2019 and remained above that level through RY2024. Harvest levels and the number of hunters pursuing deer increased, and the average number of days it took to harvest a deer decreased from RY2015 – RY2024 (Fig. 4 and 5). The average time it took to harvest a deer in Unit 1A was almost cut in half between RY2015 and RY2024, declining from 5.9 days to 3.1. This indicates that the population of deer in Unit 1A likely increased during this time, supporting the potential for additional harvest.

# Unit 1A, Cleveland Peninsula Deer - General Hunt

Residents and Nonresidents - **Harvest Ticket Required**



**AREA DESCRIPTION:** Unit 1A, Cleveland Peninsula south of the divide between Yes Bay and Santa Anna Inlet.

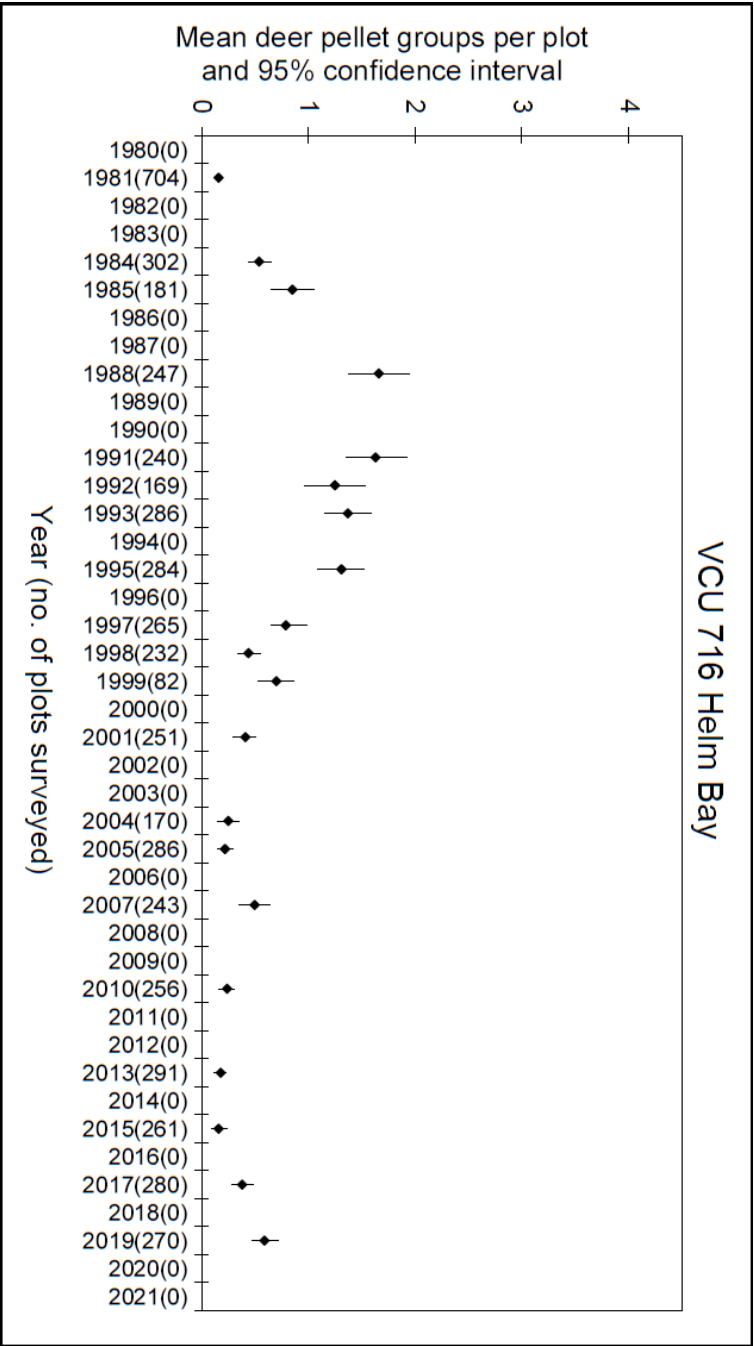


Please refer to the Alaska Hunting Regulations booklet for bag type, seasons, and additional regulations concerning this hunt.

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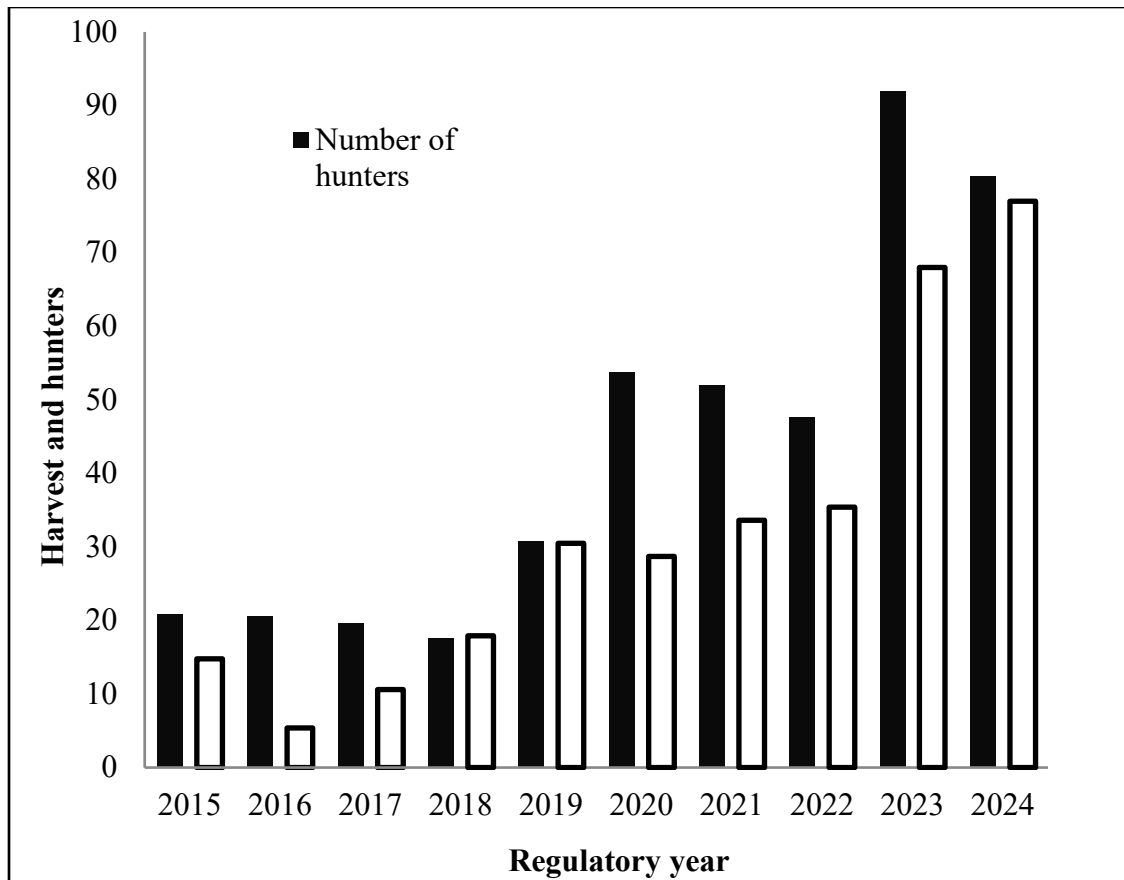
Source map: USGS 1:63,360

**Figure 1.** The Cleveland Peninsula, Unit 1A, south of the divide between Yes Bay and Santa Anna Inlet.

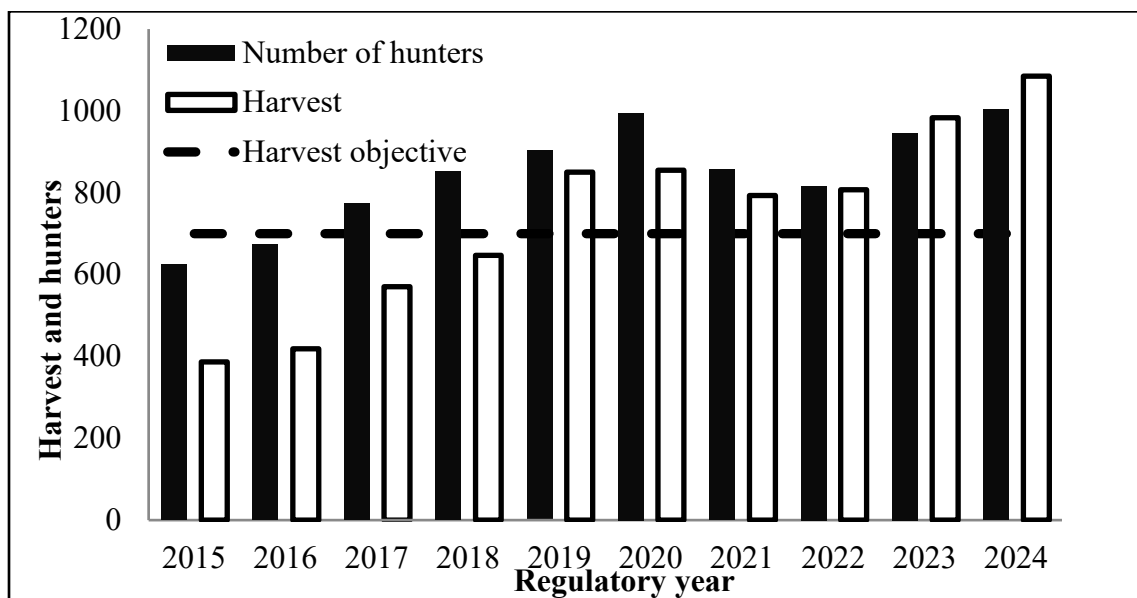


**Figure 2.** Sitka black-tailed deer pellet-group densities in value comparison unit 716, Helm Bay, Cleveland Peninsula, 1980–2021.

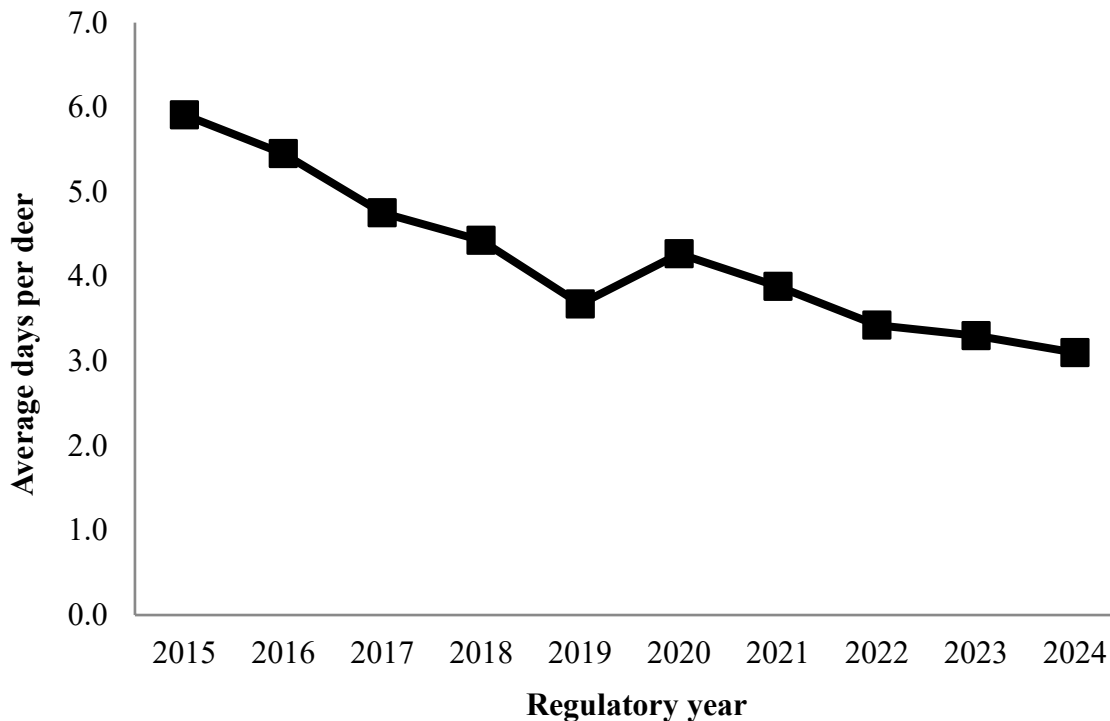




**Figure 3.** Deer harvest and hunters in Unit 1A on the Cleveland Peninsula, south of the divide between Santa Anna Inlet and Yes Bay.



**Figure 4.** Unit 1A deer harvest, hunters, and intensive management harvest objective (700 deer) from RY2015 – RY2024.



**Figure 5.** Average days taken to harvest a deer in Unit 1A from RY2015 – RY2024, Southeast Alaska.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal to increase deer hunting opportunities on the southern portion of the Cleveland Peninsula in Unit 1A given an increase in harvestable surplus exists. Recent mild winters aided in allowing the deer population in Unit 1A to recover and increase. Deer abundance on the Cleveland Peninsula is showing signs of increase along with the rest of Unit 1A, supporting the potential to allow additional hunting opportunity. If adopted, this proposal would simplify regulations by aligning the bag limit on the Cleveland Peninsula with the rest of Unit 1A. 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.

During several Ketchikan Advisory Committee (AC) meetings, members of the AC expressed interest in submitting this proposal. However, they refrained from doing so after learning the department was submitting it.

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

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**PROPOSAL 49 – 5 AAC 84.270 (13). Furbearer Trapping.** Change the wolf season start date in Unit 2 to either December 15 or January 1.

**PROPOSED BY:** Klawock Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would delay the Unit 2 wolf trapping season start date to either December 15 or January 1.

**WHAT ARE THE CURRENT REGULATIONS?**

Species and Units	Open Season	Bag Limit
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(13) Wolf

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Unit 2	Nov. 15 – Mar. 31	No limit.
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There is a positive customary and traditional use for finding 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 start date for wolf trapping in Unit 2 would change from November 15 to either December 15 or January 1. The full season in regulation would be from either Dec. 15 – Mar. 31 or Jan. 1 – Mar. 31. The season length in regulation would be reduced by either four weeks or six weeks depending on starting date.

**BACKGROUND:** During the 2019 Board of Game (board) meeting, the board aligned the Unit 2 state wolf trapping season with the federal season. This changed the start date of the trapping season from December 1 to November 15. This alignment alleviated trappers' frustrations over different start dates on different land ownerships (federal and non-federal). At the same meeting, the board endorsed the department's new management strategy which changed from a harvest quota to a season length-based strategy.

The adaptive approach to management allows the department to alter the season length based on the most recent information available for wolves in Unit 2. From 2019 to present, the department determined the trapping season based on the most recent population estimate, catch rate, and other factors to allow for sustainable harvest of wolves. The trapping season is announced by emergency order (EO) prior to the trapping season opening. The EO also closes the hunting season on the same date as the trapping season. Announcing the season dates before the season opens allows trappers to plan for the trapping season. The trapping season length varied from 62 days in 2019 to 21 days in 2020 and from 2021 to 2024, the trapping season spanned 31 days. The average catch rate from 2019 to 2024 was 2.4 wolves per day and is factored into the season

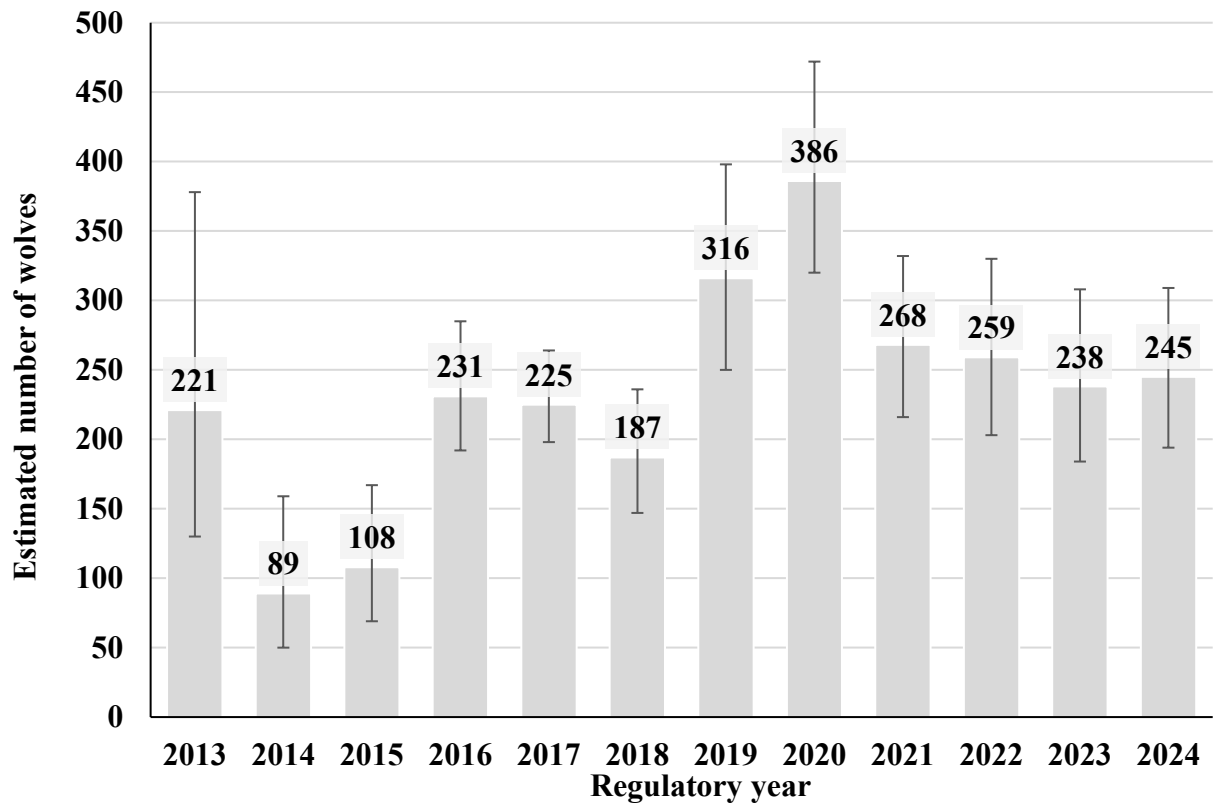


length determination. The population estimate is also taken into account for determining the season length and varied between 2019 to 2024 from 238 to 386 wolves (Figure 1). The highest harvest was in 2019 at 164 wolves; after this the department used its adaptive management strategy and decreased the season length. From 2021 to 2024 the harvest stabilized, ranging from 62 to 74 wolves.

There is debate among trappers regarding preference for a later start date versus keeping it at its current date. Those who favor keeping the same start date are typically boat-based trappers that cite concerns over traps freezing up in tidal sets. Those that argue for a later start date are mainly concerned with avoiding incidental take of deer and bears in snares.

The proponent stated that many individuals expressed concerns to the department over snares catching deer and bears because of the early season start date. The deer rut peaks in mid-November causing deer movement to be high and increasing opportunity to be caught in snares and traps. At this time, the opportunity for bears to be caught in snares and traps is higher as they prepare to hibernate. The peak time for bears moving into hibernation in Unit 2 is late October through early December. While there is considerable anecdotal information about deer and bears caught in traps and snares, the department has few documented cases where people have reported such instances.

The current average catch rate is based on the season starting November 15. The department began relying on the average catch rate in 2020, after recording the first season's catch rate in 2019 of 2.6 wolves per day. Thereafter, the average catch rate since 2019 supported the department's determination of season length each year. The department used the catch rate as of 2024 of 2.4 wolves per day to determine the 31-day trapping season for 2025. If the start date changes, the department will need to determine a new catch rate based on the new starting date. This is accomplished through monitoring the catch rate through the years and applying those findings to the season length calculation. There are many factors that influence average catch rates including the number of trappers that participate, which trappers participate, weather, fuel costs, etc.



**Figure 1.** Unit 2 wolf population estimates and associated 95% confidence intervals from regulatory year 2019 to 2024.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal and can manage sustainably with its adaptive management strategy whether the season start date changes to Dec. 15 or Jan. 1. 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 of wolves if the proposal is adopted.

If the season start date is changed, a corresponding change in the federal regulations would be necessary for this change to be effective. The author of the proposal stated that a similar proposal will be discussed during the 2026 Federal Subsistence Board meeting. If that proposal is not adopted, there will be a misalignment of the state and federal wolf trapping seasons which causes frustration for trappers due to different trapping season start dates applied to different lands. This is especially difficult for lands below the mean high-tide line under state ownership with many of the adjacent uplands in federal ownership.

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

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**PROPOSAL 50 – 5 AAC 84.270 (13) Furbearer Trapping.** Change the wolf season start date in Unit 2 to December. 15.

**PROPOSED BY:** East Prince of Wales Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would change the Unit 2 wolf trapping season start date to December 15.

**WHAT ARE THE CURRENT REGULATIONS?**

Species and Units	Open Season	Bag Limit
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(13) Wolf

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Unit 2	Nov. 15 – Mar. 31	No limit.
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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 start date for wolf trapping in Unit 2 would change from November 15 to December 15. The full season in regulation would be from December 15 – March 31, which would be a 4-week reduction in season length.

**BACKGROUND:** During the 2019 Board of Game (board) meeting, the board aligned the Unit 2 state wolf trapping season with the federal subsistence trapping season. This changed the start date of the trapping season from December 1 to November 15. This alignment alleviated trappers’ frustrations over different start dates on different land ownerships (federal and non-federal). At the same meeting, the board endorsed the department’s new management strategy which changed from a harvest quota to a season length-based strategy.

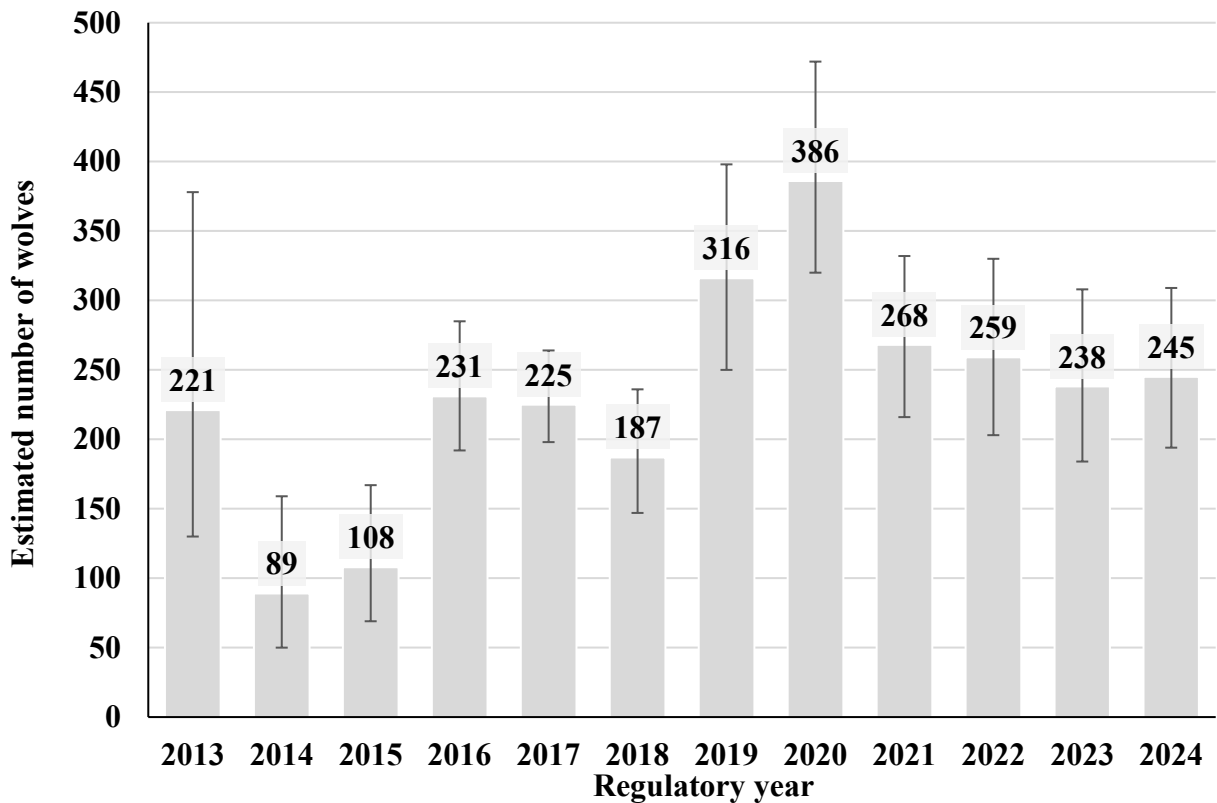
The adaptive approach to management allows the department to alter the season length based on the most recent information available for wolves in Unit 2. From 2019 to present, the department determined the trapping season based on the most recent population estimate, catch rate, and other factors to allow for sustainable harvest of wolves. The trapping season is announced by emergency order (EO) prior to the trapping season opening. The EO also closes the hunting season on the same date as the trapping season. Announcing the season dates before the season opens allows trappers to plan for the trapping season. The trapping season length varied from 62 days in 2019 to 21 days in 2020 and from 2021 to 2024, the trapping season spanned 31 days. The average catch rate from 2019 to 2024 was 2.4 wolves per day and is factored into the season

length determination. The population estimate is also taken into account for determining the season length and varied between 2019 to 2024 from 238 to 386 wolves (Figure 1). The highest harvest was in 2019 at 164 wolves; after this the department used its adaptive management strategy and decreased the season length. From 2021 to 2024 the harvest stabilized, ranging from 62 to 74 wolves.

There is debate among trappers regarding preference for a later start date versus keeping it at its current date. Those who favor keeping the same start date are typically boat-based trappers that cite concerns over traps freezing up in tidal sets. Those that argue for a later start date are mainly concerned with avoiding incidental take of deer and bears in snares.

The proponent stated that many individuals expressed concerns to the department over snares catching deer and bears because of the early season start date. The deer rut peaks in mid-November causing deer movement to be high and increasing opportunity to be caught in snares and traps. At this time, the opportunity for bears to be caught in snares and traps is higher as they prepare to hibernate. The peak time for bears moving into hibernation in Unit 2 is late October through early December. While there is considerable anecdotal information about deer and bears caught in traps and snares, the department has few documented cases where people have reported such instances.

The current average catch rate is based on the season starting Nov. 15. The department began relying on the average catch rate in 2020, after recording the first season's catch rate in 2019 of 2.6 wolves per day. Thereafter, the average catch rate since 2019 supported each year's decision for season length determination. The catch rate as of 2024 is 2.4 wolves per day and was used in determining the 31-day trapping season for 2025. If the start date changes, the department will need to determine a new catch rate based on the new starting date. This is accomplished through monitoring the catch rate through the years and applying those findings to the season length calculation. There are many factors that influence average catch rates including the number of trappers that participate, which trappers participate, weather, fuel costs, etc.



**Figure 1.** Unit 2 wolf population estimates and associated 95% confidence intervals from regulatory year 2019 to 2024.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this proposal and can manage sustainably with its adaptive management strategy whether the season start date changes to December 15 or not. If this proposal is adopted, the board should consider whether the new regulations continue to provide reasonable opportunity for subsistence uses of wolves.

If the season start date is changed, a corresponding change in the federal regulations would be necessary for this change to be effective. The author of the proposal stated that a similar proposal will be discussed during the 2026 Federal Subsistence Board meeting. If that proposal is not adopted, there will be a misalignment of the state and federal wolf trapping seasons which causes frustration for the trappers due to different trapping season start dates depending on the land ownership. This is especially difficult with the land below the mean high tide line under state ownership and many uplands in federal ownership.

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

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**PROPOSAL 51 – 5 AAC 84.270 (13). Furbearer Trapping.** Change the Unit 2 wolf trapping season from November 15 – March 31 to November 15 – December 29.

**PROPOSED BY:** Craig Advisory Committee

**WHAT WOULD THE PROPOSAL DO?** This proposal would change the Unit 2 wolf trapping season to November 15 – December 29.

**WHAT ARE THE CURRENT REGULATIONS?**

Species and Units	Open Season	Bag Limit
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(13) Wolf

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Unit 2	Nov. 15 – Mar. 31	No limit.
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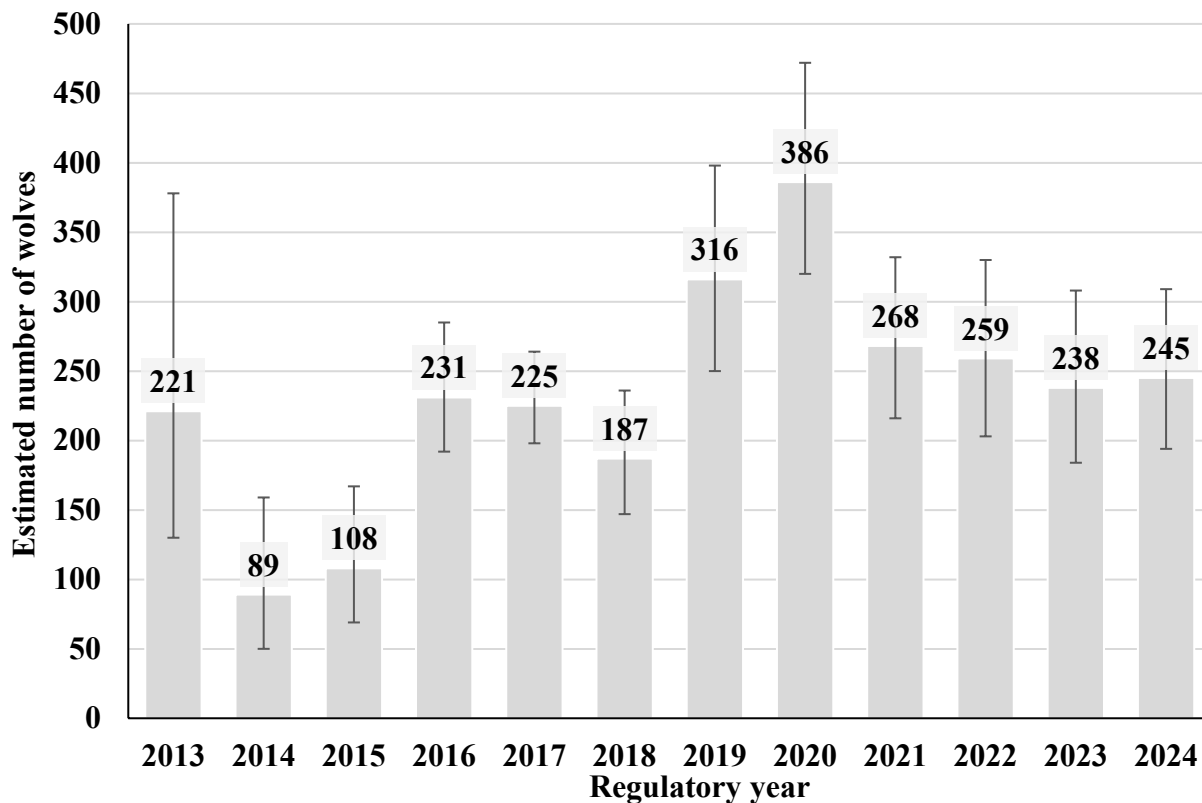
There is a positive customary and traditional use finding for wolves in Unit 2 and an amount reasonably necessary for subsistence of 90% of the harvestable surplus.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The wolf trapping season in Unit 2 would be reduced from 137 days to 45 days in regulation. The intent of this proposal is to require a minimum season of 45 days, not necessarily to shorten the season to 45 days from the current 137 days. The current management strategy determines season length based on the most recent population estimate, recent catch rates, and other factors to provide a season length that allows for sustainable harvest. As a result, reducing the overall season length in regulation may not lengthen the actual trapping season.

**BACKGROUND:** During the 2019 Board of Game (board) meeting, the board aligned the Unit 2 state wolf trapping season with the federal season. This changed the start date of the trapping season from December 1 to November 15. This alignment alleviated trappers' frustrations over different start dates on different land ownerships (federal and non-federal). At the same meeting, the board endorsed the department's new management strategy which changed from a harvest quota to a season length-based strategy.

The adaptive approach to management allows the department to alter the season length based on the most recent information available for wolves in Unit 2. From 2019 to present, the department determined the trapping season based on the most recent population estimate, catch rate, and other factors to allow for sustainable harvest of wolves. The trapping season is announced by emergency order (EO) prior to the trapping season opening. The EO also closes the hunting season on the same date as the trapping season. Announcing the season dates before the season

opens allows trappers to plan for the trapping season. The trapping season length varied from 62 days in 2019 to 21 days in 2020 and from 2021 to 2024, the trapping season spanned 31 days. The average catch rate from 2019 to 2024 was 2.4 wolves per day and is factored into the season length determination. The population estimate is also taken into account for determining the season length and varied between 2019 to 2024 from 238 to 386 wolves (Figure 1). The highest harvest was in 2019 at 164 wolves; after this the department used its adaptive management strategy and decreased the season length. From 2021 to 2024 the harvest stabilized, ranging from 62 to 74 wolves.



**Figure 1.** Game Management Unit 2 wolf population estimates and associated 95% confidence intervals from regulatory year 2019 to 2024.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on shortening the season because it can manage sustainably with its adaptive management strategy relying on emergency order closures ahead of the season. If this proposal is adopted, the board should consider whether the new regulations continue to provide reasonable opportunity for subsistence uses of wolves.

The proponent is asking for a minimum season of 45 days instead of the shorter seasons previously implemented by the department through an emergency order. The department understands that trappers desire a longer wolf trapping season; however, at this time, a conservative approach to management is necessary until further research is conducted and



finalized to determine if a longer season length and additional wolf harvest is sustainable. In those years when a shorter season is required for conservation purposes, EO authority lies with the Commissioner and not the board.

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

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