

Alaska Board of Game

On-Time Public Comments

RC3

Southeast Region Meeting

January 23-27, 2026

Wrangell, Alaska

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Name: Rod Arno, Alaska Outdoor Council

Community of Residence: Palmer

Comment:

Proposal 2: Support

The Alaska Outdoor Council ask that the Board consider comments on positions stated by its member Club the Territorial Sportsman Inc. (TSI) and all proposals unless stated otherwise in recorded comments.

Proposal 3: Oppose

Refer to TSI comments

Proposal 4: Support

Refer to TSI comments

Proposal 6: Support

Refer to TSI comments

Proposal 7: Support

Refer to TSI comments

Proposal 9: Support

Refer to TSI comments

Proposal 11: Support

Refer to TSI comments

Proposal 14: Support

Refer to TSI comments

Proposal 15: Support

Refer to TSI comments

Proposal 17: Support

Refer to TSI comments

Proposal 18: Oppose

Refer to TSI comments

Proposal 24: Support

Refer to TSI comments

Proposal 26: Oppose

Refer to TSI comments

Proposal 27: Support

Refer to TSI comments

Proposal 28: Oppose

The Alaska Outdoor Council sees no advantage in reducing hunter opportunities on an easily accessible population of deer that is not limited by habitat restraints.

Proposal 29: Oppose

Unnecessary reduction in hunter opportunity.

Proposal 30: Oppose

The Alaska Outdoor Council (AOC) is continually dismayed by the Alaska Board of Game's willingness to acquiesce to the federal intrusion on state management and allocation of game in Alaska. Before the board further convolutes the opportunity to hunt moose in GMU5A under either subsistence use or general hunt AOC recommends that the board review the Alaska Supreme Court decision in the Totemoff v State of Alaska, 1995 case.

The Alaska Supreme Court determined in that case that the state had not ceded jurisdiction on federal lands or waters to the US Department of the Interior to manage or allocate game under Title VIII of ANILCA. Should the Board choose to adopt regulations under 5 AAC 85.045(a)(3) to create a state permit for physically disabled moose hunters and their proxies make it for all of GMU5A ,excluding Glacier Bay National Park.

The Alaska Outdoor Council strongly suggests that the Alaska Board of Game stop conceding to the Federal Subsistence Board's overreaching regulations statewide.

Proposal 34: Oppose

Refer to TSI comments

Proposal 43: Support

The Alaska Outdoor Council supports increasing ungulate harvest whenever harvestable surplus is available on a sustainable bases. Stockpiling game in the field is not a viable option

Proposal 48: Oppose

The Alaska Outdoor Council is not supportive of increasing wolf predation on declining deer populations that are accessible for humans to harvest.

Proposal 51: Support

Declining deer populations that are easily accessible to hunters because of possible habitat alterations don't need the added negative factor of wolf predation

Proposal 52: Support

Hunter participation for deer on POW Island has a long recorded history of harvest.

While the Board has no regulatory authority over timber harvest it does have the authority to reduce predation. Requiring ADF&G to come up with current predator/prey populations to implement intensive management under AS 16.05.255 would be helpful to the state while it continues to fight off attacks by animal rights activists.

Proposal 54: Oppose

Unnecessary regulation



Name: Thor Stacey, Alaska Professional Hunters Association

Community of Residence: Juneau

Comment:

Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the January meeting in Wrangell. The APHA's members rely on fair and predictable allocation to non-resident hunters based on defensible biological parameters that are in line with the principles of sustained yield and result in a maximum benefit to ALL users. The APHA maintains its support of the Board's current allocative policies and believes that the well defined, species specific, resident preferences are in the best interests of all Alaskans.

Guided Hunt Allocation Benefits Resident Hunters, Visiting Hunters, Guides & Non-hunters

APHA commissioned its first socioeconomic report with the McDowell Group in 2014, titled "Economic Impacts of Guided Hunting in Alaska." More recently (2019), APHA partnered with Dallas Safari Club to add to and update McDowell's 2014 seminal work. "The Economic Importance of Hunters Visiting Alaska; Alaska's Guided Hunting Industry 2019" provides new information on funding for conservation that our visiting clients contribute to wildlife management. Guiding hunters is primarily an activity that occurs in rural areas of Alaska.

- 91.8 Million total economic output (2019) • 57.4 Million new dollars to Alaska (2019)
- 59% of guide industry spending occurs in rural areas (2019) • 1,380 people directly employed, total employment with multipliers; 1,890 (2019)
- 85% Active Guides are AK Residents (2019) • Visiting hunters (guided & non-guided) purchase 14% of total Alaska hunting licenses (2019)
- Guided nonresidents represented only 3% of current licenses but 30% of License/tag revenue • Visiting hunters (guided & non-guided) contribute 76% of total revenue to the ADFG wildlife conservation fund (2019)

Significance to Alaskans & Meat Sharing

Guiding hunters in Alaska has its origins in Territorial days. Because of our rich history, guides have deep roots in communities across Alaska, with many guides living in remote communities or "Bush Alaska." The APHA worked with McDowell to quantify what some of the benefits that Alaskans reap from Guided Hunting. In 2019, 31.9 million new dollars went to Alaska business that were directly attributed to Guided Hunting. This generated another 19.1 million in economic

activity in the support sector. Hunting guides do what they can to share the harvest; 223,500 lbs of well cared for, high quality game meat was shared with their fellow Alaskans in 2019.

Individual Proposal Comments

Below you will find our comments on individual proposals under your consideration for the Region I meeting. Leading up to the drafting of these comments the APHA held multiple teleconferences and invited all members to participate in the drafting of these comments. Our teleconferences were well attended with over 20 individual guides representing small Alaskan businesses participating. You will find that there are some proposals that we don't have comments listed for. These were proposals that we felt did not directly impact guides or were outside of the group's purview. We also chose, in a couple of instances, to group similar proposals together and combine our recommendations. While these comments represent the voice of our group, you will undoubtedly get comments from APHA members who want their individual positions considered as well. Because the APHA takes a statewide perspective when approaching Board proposals, we urge you to consider regional expertise from our members even when their position is different from that of the APHA. Finally, we thank you for your consideration and urge you to reach out to our membership for clarity and details on proposals before you, either on a unit-by-unit or regional basis. Given the opportunity, Alaska's hunting guides will continue to bring a wealth of wildlife and hunting knowledge to the table.

Guided hunting has deep roots in Southeast Alaska communities. Our members live and work in rural areas across the region and provide firsthand biological observations that complement Department survey and inventory work. Where species-specific management plans exist, APHA strongly supports maintaining their integrity and cautions against piecemeal regulatory changes.

Individual Proposal Comments – Region 1

Proposal 1 & 2 – OPPOSE

The APHA opposes props. 1 & 2 because they do not address a defined conservation concern, defined enforcement objective or improve the quality of hunting opportunities in Region I. During consideration of Props. 1 & 2 guides expressed concern about just passing this restriction in one region of the state, there were also concerns expressed about losing hunting opportunity, especially for bears, at last light or during fall and spring seasons. Waterfowl restrictions allow shooting before and after sunset for a period of time. Props 1 & 2 will restrict hunting when there is still natural shooting light, during prime periods of the day to hunt and harvest animals.

Proposal 3 – OPPOSE

The APHA strongly opposes allowing the take of goats in Region I the same day a hunter has been airborne. Guide opposition to Prop 3 is based on support of fair chase hunting practices and precedent around the state.

Proposal 4 – SUPPORT

The APHA supports Prop 4 because it promotes ethical hunting practices. Current definition of take for brown bears in Region I are working. Guides expect aligning the definition of take for goats and browns bear to be similarly effective.

Proposal 5 – OPPOSE

Proposal 5 generated a lot of discussion from the guides. The APHA opposes Prop. 5 because brown bear harvest levels are believed to be near sustainable levels in Unit 1 “remainder” at this time. Brown bears in Region I are coastal bears and provide valuable hunting opportunities for residents and guided non-residents. Increasing the bag limit to 1 bear annual is viewed as an unnecessary departure from the highly successful 1 every 4 year bag limit.

Proposal 6 & 7 – SUPPORT

APHA supports Proposal 6 consistent with Department recommendations. ADFG calculates additional wolf harvest likely to occur by passing this proposal will be in the low single digits.

Proposal 8 & 9 – SUPPORT

APHA supports Proposal 8. Mountain lions are periodically sighted in Region I although they are not considered native to the region. Similar to when the board opened up a mule deer season, the board should define a mountain lion season so the the rare, invasive lion can be retained by the lucky hunter.

GMU 4 Brown Bear Proposals – Proposals 19, 20, 21, and 22 – OPPOSE

APHA strongly opposes Proposals 19–22 because they seek to modify brown bear management within Game Management Unit 4 outside of the Unit 4 Brown Bear Management Strategy (BBMS).

The BBMS is a management plan adopted by the Board of Game to guide brown bear management decisions in GMU 4. The BBMS has been highly effective at achieving its goals over the past 20 plus years. APHA and individual guides participated directly in its development, and the plan has proven effective at maintaining sustainable harvest levels while reducing user conflict. Piecemeal changes to brown bear regulations that circumvent the BBMS risk undermining stakeholder trust and destabilizing a successful management framework. The APHA strongly opposes proposals 19-22.

Proposal 23 – OPPOSE

The APHA opposes proposal 23 based on concerns about commercial hunting management, specifically transporters, in Region I.

The APHA is in agreement with the department on the following points-

- Deer populations are high and near carrying capacity in most portions of GMU 4
- Increasing nonresident bag limit to 4 deer will not result in a large increase in harvest

- Deer populations are driven largely by weather, human harvest has a negligible impact at the population level, especially in GMU 4 due to lack of predation

The APHA supported the Board's action to reduce the non-resident deer bag limit in GMU 4 to two bucks based on the follow-

- Looming proposals at the Federal Subsistence Board (FSB) to close large portions of federal land in GMU 4 to non-federally qualified users
- Lack of management or regulatory structure to regulate transporters
- Declines at the time in Kodiak deer populations
- Deer allocation conflicts in Kodiak driven by intense transporter use

Summary:

The APHA remains concerned about the potential for high nonresident bag limits to create a boat based, transporter industry like on Kodiak Island. SEAK is more sensitive to crowding and hunter displacement concerns than on Kodiak because of the heavy timbered nature of the terrain and limited all-weather anchorages. It is the APHA's belief that transporter driven conflict in SEAK will be more controversial than on Kodiak and these conflicts will incite continued efforts at the FSB to close areas to non-federally qualified users. It's important to mention that Alaskan residents who are not federally qualified are also impacted by FSB closures, not just nonresidents.

Guides who discussed this proposal and helped the APHA develop its position spoke consistently about how difficult it will be to deal with large boat-based transporters in SEAK while recognizing even a much-expanded harvest will have little to no effect on the deer population in GMU 4. Opposition to Prop. 23 is rooted in reducing conflicts between resident hunters, transporters and guides. Members pointed to the conflicts and opportunity reductions and hunt quality loss for black bear hunting as an example. Lodges expanded their un-guided black bear hunting opportunities, and a complex set a management decisions needed to be made to address excessive harvest. Deer are valued by SEAK residents more than black bears, but the hunting guides believe caution is warranted where a new commercial market and use can be created by having large nonresident bag limits on the books.

In conclusion, the APHA believes the Department is correct that expanding nonresident deer bag limits will not negatively impact the deer population. The department's mission is to promote and support sustainable hunting opportunity. Proposal 23 offers additional opportunity and if a large, transported deer industry does not become an outgrowth of high nonresident deer seasons most of APHA's concerns amount to handwringing. If transported deer hunts grow significantly in the future they will be difficult to regulate because 95% of SEAK is federal land and ADFG and the board of game will need to partner with the Forest Service to create a regulatory structure to deal with mostly conflicts and Alaska resident displacement.

Proposal 31, 32 & 33 – OPPOSE

The APHA carefully considered proposals to liberalize brown bear hunting GMU 1. Guides participating in the discussion highlighted that they have been seeing more participation in brown bear hunts. The APHA is concerned harvest levels could increase to a point where emergency closures may be considered in the future. Emergency closures are difficult for guides to manage when hunts are booked years ahead of time. The APHA would prefer current seasons and bag limits remain in place for brown bear in GMU 1 because current opportunity is sustainable and conservation goals appear to be being met.

Respectfully submitted,

Alaska Professional Hunters Association

Proposals 1 and 2: Ban the take of big game between civil twilight of sunset until civil twilight of sunrise the following day in Units 1-5

AWA SUPPORTS: We agree with the proposers' concerns about poaching big game at night, especially given the Board's recent passage of statewide night vision and FLIR. This regulation has precedent, as evidenced by State and federal regulations prohibiting the take of waterfowl between sunset to one-half hour before sunrise. Legal shooting hours have addressed safety and ethical issues in other states and could benefit Alaska, especially Southeast, who seemed uniformly opposed to night vision big game hunting at the 2025 statewide meeting. We anticipate this regulation would also cut down on waste, as it would restrict hunting when animals are hard to see and it's difficult to determine the point of impact.

Proposal 4: Add mountain goats in Units 1 – 5 to the list of animals that when wounded, count against that person's bag limit for the regulatory year

AWA SUPPORTS: This proposal encourages ethical hunting practices, provides better data to the department, and would improve goat conservation while still providing hunter opportunities. We agree with the Department's comment that Mountain goats, perhaps more than any other North American big game, are susceptible to wounding loss, as they often seek steep escape cover when shot. The Department already receives some voluntary wounding loss numbers, but the impact of wounding loss is difficult to assess without reporting. Adoption of this proposal would benefit mountain goat conservation, particularly with regard to the smaller, isolated sub-populations, if managers had better information about goat wounding loss and the ability to count unrecovered goats toward zone quotas. Requiring wounding loss reporting via counting it toward a bag limit provides a more accurate reflection of total human-caused mortality. Finally, AWA's membership includes many hunters who ascribe to fair chase and ethical hunting standards that require a wounded animal to be counted against the bag limit. This is a regulatory practice echoed in many other states.

Proposal 5: Align the hunting season for wolves in Unit 1 to August 1 – May 31.

AWA OPPOSES: This proposal would lengthen the wolf hunting season by one month in units 1B remainder, 1C, and 1D, which would extend the hunting season into denning and pup dependency periods. AWA is opposed to hunting and trapping animals during their denning



and rearing seasons.

Proposal 7: Align hunting season for wolves in units 1A, 1B, and 1C to August 1–May 31.

AWA OPPOSES: This proposal would lengthen the wolf hunting season in units 1B remainder and 1C for one month, further extending the hunting season into denning and pup dependency periods. AWA is opposed to hunting and trapping animals during their denning and rearing seasons.

Proposal 8: Open a hunting season for mountain lion in units 1-5.

AWA OPPOSES: We oppose this proposal because there is a clear lack of policy regarding species that colonize Alaska from Canada. Fisher, white tailed deer and mule deer have already crossed over the transnational boundary, and the state has responded with hunting and trapping seasons after various waiting periods and population studies (some colonizing species are prioritized for research, others are not). AWA is not opposed to a hunting season on mountain lions, but our limited understanding of mountain lion presence (ex: population goals or harvestable surplus) gives us pause. There is very little data on mountain lion presence, and certainly no harvestable surplus of mountain lions in the region, as a breeding population is not established in Alaska. Deer and mountain lions co-occur everywhere else in North America. We believe lion distribution in Alaska will ultimately catch up to deer and the species could colonize the state; AWA does not consider lions to be invasive in this context. We encourage a broader policy discussion on how ADFG treats new species, and the best practices in determining whether a colonizing species should be resisted or fostered under hunting and trapping regulations. If a hunting season is opened, it's extremely important that lions are sealed so that ADFG has records of harvest. Finally, if a season is approved, we strongly prefer proposal 8 to proposal 9, as the first has restrictions against female with kitten and kitten harvest.

Proposal 9: Open a hunting season for mountain lion in units 1-5.

AWA OPPOSES: This proposal would create hunting and trapping seasons for mountain lion in units 1, 2, 3, 4, and 5, with a year-round season and a bag limit of one (any sex or age), and both hunting and trapping seasons would be open to residents and nonresidents. AWA also opposes this proposal because the bag limit does not protect kittens and females with kittens. For additional comments, see AWA comments on proposal 8.

Proposal 10: Remove the sealing requirement for beaver in Units 1 – 5.

AWA OPPOSES: Beaver harvest in Southeast Alaska is highly variable from year to year. Unlike big game harvest data which can be used as a proxy for intensive surveys as an indicator of



population trends, harvest numbers for furbearers are more influenced by trapper interest and availability. The participation of just 1 or 2 skilled trappers can have a significant impact on overall beaver harvest numbers. The Board has also liberalized beaver harvest regulations over the past decade by allowing the use of firearms in 2015 and extending the season in 2019. Given the ebb and flow of trapper participation and liberalized methods/seasons for killing beavers, we believe sealing data is very important to managing beavers in the region. Sealing and the annual trapper questionnaire are currently the only tools the department has to track beaver populations. The department lists some specific circumstances where sealing has been informative. For example, documenting population expansion in Subunit 5A and range expansion into the Chilkat River valley in Subunit 1D may not have been documented if sealing was not required. If this proposal were adopted, the department could rely on responses to the trapper questionnaire to monitor trends in beaver harvest, which is far more opaque.

Proposal 12: Prohibit the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Units 1-5.

AWA SUPPORTS: AWA strongly opposed the regulation change that allows FLIR Statewide in 2025. A FLIR detects infrared radiation emitted from a heat source by using thermal or infrared technology to create a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. FLIR technology is available in handheld cameras and cameras that can be attached to a smartphone, goggles, or rifle scopes - they are widely available and easy to use. Night vision devices and FLIR devices provide aid to trappers allowing identification of and locating animals from far away through barriers such as snow and darkness, including big game. FLIR had only been legal in the Interior for one year, so the impacts of the change are widely unknown (i.e. take of big game using FLIR), yet were hastily applied to the whole state. Almost every - if not all- of the Southeast ACs opposed the Statewide FLIR regulation, asking for a regional exemption due to poaching concerns. We share the proposer's concern that there is potential to abuse the use of FLIR or night vision to aid in the taking of big game, particularly in Southeast. This would not be a complex regulation change, especially if it's applied to the whole Southeast region.

Proposal 13: Prohibit the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Units 1-5 during any open deer season.

AWA SUPPORTS: AWA strongly opposed the regulation change that allows FLIR Statewide in 2025. A FLIR detects infrared radiation emitted from a heat source by using thermal or infrared technology to create a picture instead of amplifying visible light. FLIR devices make it



possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. FLIR technology is available in handheld cameras and cameras that can be attached to a smartphone, goggles, or rifle scopes - they are widely available and easy to use. Night vision devices and FLIR devices provide aid to trappers, allowing identification of and locating animals from far away through barriers such as snow and darkness, including deer. FLIR had only been legal in the Interior for one year, so the impacts of the change are widely unknown (i.e. take of big game using FLIR), yet were hastily applied to the whole state. Almost every - if not all- of the Southeast ACs opposed the Statewide FLIR regulation, asking for a regional exemption due to deer poaching concerns. We share the proposer's concern that there is potential to abuse the use of FLIR or night vision to aid in the taking of deer, particularly in Southeast.

Proposal 14: Increase the fisher bag limit from 1 to 3 per regulatory year in Units 1 – 5.

AWA OPPOSES: No formal population estimates are available for fishers in Southeast Alaska. Harvest and trail camera data, and anecdotal observations are the only information available to inform population trends. ADFG comments that the recent decline in the reported fisher harvest could be indicative of a decline in the fisher population or a change in trapping effort. However, data on trapping effort is lacking because of the small number of trappers in Southeast who respond to the annual trapper questionnaire. In short, we don't have a handle on the existing fisher population or how the colonizing population is doing. The incidental take of fishers already occurs; if the limit were raised, it would be an addition on top of what is already harvested accidentally. Given what little data we have on fisher populations and trapper effort, plus the incidental take of fishers already, the Precautionary Principle in wildlife management demands that the season not be liberalized. If there were a substantial increase in fisher trapping effort (relative to the fisher population), it could negatively impact this colonizing population without us knowing.

Proposal 15: Remove the bag limit for fishers in Units 1 –5.

AWA OPPOSES: Firstly, AWA is generally opposed to no limit seasons, and especially opposed when there's no limit for both residents and non-residents *and* there's little to no information on the species population or harvest trends. No formal population estimates are available for fishers in Southeast Alaska. Harvest and trail camera data, and anecdotal observations are the only information available to inform population trends. ADFG comments that the recent decline in the reported fisher harvest could be indicative of a decline in the fisher population or a change in trapping effort. However, data on trapping effort is lacking because of the small number of trappers in Southeast who respond to the annual trapper questionnaire. In short, we don't have a handle on the existing fisher population or how the colonizing



population is doing. Allowing the maximum liberalization of trapping on a colonizing species, with no way of accurately tracking the harvest rates or population of the species, would be extremely unwise; if there were a substantial increase in fisher trapping effort (relative to the fisher population), we could dramatically reduce the fisher population without realizing it.

Proposal 17: Change the bag limit for grouse in Units 1-5 by prohibiting the take of females between March 15 and May 15.

AWA SUPPORTS: This proposal would not alter the current season dates (August 1–May 15) but would modify the bag limit to only allow harvest of male grouse from March 15 to May 15 within the region. Current hunting regulations allow harvest of females until May 15, which may overlap the beginning of the nesting period. AWA generally opposes the take of species during their nesting or rearing season.

We acknowledge that data is limited, but per department comments, the harvest of females may be highest during the spring, as 54% of donated wings from females were taken during the months of April and May. We also note the study conducted from 2007–2008 (Nelson 2010) documented nesting activity from May 14 to July 1 for spruce grouse on Prince of Wales. Similarly, hatch data from a study of sooty grouse in British Columbia indicated nest initiation for sooty grouse may begin as early as May 7. Protecting females during the nesting portion of the hunting season seems prudent. The differences between males and females, especially during the mating season, would allow hunters to select for males only, and limiting harvest to males only after March 14th will likely result in fewer females being harvested each year.

Proposal 18: Change the season dates for grouse in Units 1 – 5 from August 1–May 15 to August 10– May 31.

AWA OPPOSES: This proposal would shift the season dates so that the hunting season would extend into late May, which means the hunting season would overlap with the nesting period for sooty and spruce grouse. Given that the season is open to males and females, additional harvest of females during the latter part of the nesting season could result in a conservation concern for both sooty and spruce grouse.

Proposal 19: Extend the RB089 brown bear hunting season closure date for residents only by 11 days, from May 20 to May 31

AWA OPPOSES: The Unit 4 Brown Bear Management Strategy (BBMS) guides bear management in this unit. This is a comprehensive management plan developed in 2000 and last updated in 2013 to address the needs of multiple interest groups, both consumptive and non-consumptive. The guidelines in the plan, along with current seasons and bag limits, have been relatively successful in providing a sustainable brown bear harvest while also providing



high-quality bear viewing opportunities. Changing the hunt dates, as proposed in this proposal, would lead to conflicts in the field between user groups. The current hunt structure was developed via a multi-user group plan, specifically to reduce conflicts based on known dates and areas. A change in hunting season via regulation introduces a change to that agreement without consulting the stakeholders who developed it. Because the BBMS involved various stakeholder groups to come to management consensus, it is not appropriate (and a breach of the public trust in the BBMT process) to make major changes in the hunt structure without reconvening the Brown Bear Management Team.

Proposal 20: Change hunt boundaries of RB/DB088 and DB/RB089 to include all of Lisianski Inlet drainage

AWA OPPOSES: We echo our comments in opposition to proposal 19. The Unit 4 Brown Bear Management Strategy (BBMS) guides bear management in this unit. This is a comprehensive management plan developed in 2000 and last updated in 2013 to address the needs of multiple interest groups, both consumptive and non-consumptive. The guidelines in the plan, along with current seasons and bag limits, have been relatively successful in providing a sustainable brown bear harvest while also providing high-quality bear viewing opportunities. Changing the hunt boundaries, as proposed in this proposal, would lead to conflicts in the field between user groups. The current hunt structure was developed via a multi-user group plan, specifically to reduce conflicts based on known dates and areas. A change in hunting boundaries via regulation introduces a change to that agreement without consulting the stakeholders who developed it. Because the BBMS involved various stakeholder groups to come to management consensus, it is not appropriate (and a breach of the public trust in the BBMT process) to make major changes in the hunt structure without reconvening the Brown Bear Management Team.

Proposal 21: Change hunt boundaries of RB/DB088 and DB/RB089 to include Northeast Chichagof Island

AWA OPPOSES: We echo our comments in opposition to proposals 19 and 20. The Unit 4 Brown Bear Management Strategy (BBMS) guides bear management in this unit. This is a comprehensive management plan developed in 2000 and last updated in 2013 to address the needs of multiple interest groups, both consumptive and non-consumptive. The guidelines in the plan, along with current seasons and bag limits, have been relatively successful in providing a sustainable brown bear harvest while also providing high-quality bear viewing opportunities. Changing the hunt boundaries, as proposed in this proposal, would lead to conflicts in the field between user groups. The current hunt structure was developed via a multi-user group plan, specifically to reduce conflicts based on known dates and areas. A



change in hunting boundaries via regulation introduces a change to that agreement without consulting the stakeholders who developed it. Because the BBMS involved various stakeholder groups to come to management consensus, it is not appropriate (and a breach of the public trust in the BBMT process) to make major changes in the hunt structure without reconvening the Brown Bear Management Team.

Proposal 22: Extend RB/DB077 brown bear hunting season by moving the start date to September

AWA OPPOSES: We echo our opposition to proposals 19-21. The Unit 4 Brown Bear Management Strategy (BBMS) guides bear management in this unit. This is a comprehensive management plan developed in 2000 and last updated in 2013 to address the needs of multiple interest groups, both consumptive and non-consumptive. The guidelines in the plan, along with current seasons and bag limits, have been relatively successful in providing a sustainable brown bear harvest while also providing high-quality bear viewing opportunities. Changing the hunt dates, as proposed in this proposal, would lead to conflicts in the field between user groups. The current hunt structure was developed via a multi-user group plan, specifically to reduce conflicts based on known dates and areas. A change in hunting season via regulation introduces a change to that agreement without consulting the stakeholders who developed it. Because the BBMS involved various stakeholder groups to come to management consensus, it is not appropriate (and a breach of the public trust in the BBMT process) to make major changes in the hunt structure without reconvening the Brown Bear Management Team.

Proposal 26: Restrict hunters who take nanny goat in Unit 1C from hunting goat in Unit 1C for the following four regulatory years

AWA SUPPORTS: The killing of nannies poses a conservation concern, and we appreciate that the Board adopted similar proposals to this in Units 6, 7, and 15, which state that if a nanny is taken in any of those units the hunter is prohibited from hunting any goats in the unit for 5 years. The board adopted a similar proposal for Unit 1D, which restricts hunters who harvest a nanny from harvesting a goat for 1 year. We support this proposal to encourage hunters to be absolutely certain that they do not kill a nanny in the field.

Proposal 31 and 32: Change the bag limit on the Chilkat Range in Unit 1C from one bear every 4 years to one bear every year

AWA OPPOSES: The proposal would allow for the harvest of 1 brown bear every year within the Chilkat Range and remove the 4-year waiting period currently in place between harvests. AWA opposes this proposal because a liberalization of this magnitude would likely result in



harvest levels above the sustainable guideline harvest level (GHL) set for the population. Based on brown bear densities estimated in other Southeast Alaska mainland brown bear populations, the department estimates the Chilkat Range population size is between 68 and 146 bears. Given a sustainable guideline harvest level (GHL) of 4% used across most of Southeast Alaska, the department determined the allowable harvest is between 2–5 brown bears per year. This is a conservative harvest estimate established in the Unit 4 Brown Bear Management Plan. Brown bear harvest along the Chilkat Range has been equal to *or greater than* this GHL for 8 of the past 10 years.

In short, the current regulations are already meeting (or exceeding) the sustainable harvest level - an increase in bear harvest is simply not sustainable. This is especially true given that the department's current monitoring and harvest management is not designed to initiate in-season management. Brown bears have a slow reproductive cycle; they begin breeding at 5 years old and have young every 3–4 years. The department notes that there are minimal incidences of emigration and immigration in brown bear populations within the Chilkat Range. So, if the harvest is dramatically increased it would take a long time for this isolated population to recover.

Finally, the proponent suggests there is an increase in the brown bear population in this area, yet the department comments that the increased hunter participation and harvest from the most recent 5-year period do not indicate a growing brown bear population.

Proposal 33: Change the bag limit in Unit 5 from 1 bear every 4 regulatory years to 1 bear every regulatory year.

AWA OPPOSES: The department does not have information that suggests bear populations have increased in Unit 5. Since the early 2000s, the department has tried to manage the harvest of brown bears in Southeast Alaska at or just above 4% of the population to ensure sustainable harvest, and it seems the current hunt structure is meeting that goal. Brown bear harvest has been low over the last 10 years in units 5A and 5B, but the department attributes this to the local transporter not taking bear hunters out on hunts, unlike prior to 2014 when transportation was more readily available to hunters than in the last decade. In 2025, a new air taxi opened which will likely increase access. In light of this new access, we do not believe it prudent to liberalize the season. The department's current monitoring and harvest management is not designed to initiate in-season management, so a change this dramatic in regulation would not be easily remedied until years after over-harvest.

Proposal 34: Open the Juneau Road System Closed Area to archery hunting for big game (black bear, brown bear, deer, moose, mountain goat, and wolf)

AWA OPPOSES: This area has been closed to big game hunting since 1967. Opening an



archery season in the inhabited areas of Juneau is likely to lead to conflict: trespass concerns, the potential for wounded animals to end up in neighborhoods, and arrows crossing between property lines. We disagree with the proposer's assumption that an in-town archery hunt would lower the bear population, or that locals want fewer bears in town. The department's recent graduate student research shows that Juneau residents overwhelmingly like to live around bears (93% of respondents) and that they do not want the number of bears reduced by hunting (70% of respondents).

Proposal 35: Open the Thane Road portion of the Juneau Road System Closed Area to archery hunting for big game (black bear, deer, mountain goat, and wolf).

AWA OPPOSES: This area has been closed to big game hunting since 1967. Opening an archery season in the inhabited areas of Juneau is likely to lead to trespass concerns and the potential for large, wounded animals to end up in neighborhoods.

Proposals 37-41: Reduce the bag limit for deer in Unit 2 (varying reductions for both residents and non-residents or non-resident only).

AWA SUPPORTS: Harvest opportunity for and access to deer in Unit 2 have undeniably become more difficult. Logging and forest stand succession have negatively impacted deer habitat and hunter access in much of Unit 2. From our membership in the region and after participating in the Unit 2 Deer Summit, we agree with the Advisory Committee statement that Unit 2 residents "are concerned about the steady and significant decline in deer numbers." Despite highly liberalized wolf hunting and trapping regulations, deer harvest in Unit 2 has been below the objective in all years since 2016.

Fundamentally, this is a habitat problem that is now manifesting in harvest regulations. The commercial logging legacy on Prince of Wales has altered deer habitat and hunter access. Roads built to support logging yield the highest density of roads in Southeast Alaska, with approximately 2,500 miles of drivable roads (compared to much of Alaska, whose regulations often assume a lack of road access); the department notes that this has increased hunter access. The logging itself has reduced winter deer habitat in north central Prince of Wales Island by 46% and in south POW by 18%. Old-growth forests provide important deer wintering habitat, as 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. Uniform-aged second-growth forests do not intercept snow as well, reducing the accessibility of ground-level forage to deer. Removing important deer wintering habitat has an extremely negative long-term impact on deer populations, especially island populations. Clear-cut logging leads to abundant ground-level forage for deer and other species in the years immediately following the clear-cut, but the initial flush of vegetation is succeeded by a



“stem exclusion” stage where a dense tree canopy limits light and results in the death of weaker trees and weaker seedling establishment. This stage of forest growth is largely unproductive for many species, including deer, and can last for more than 150 years. The department cites that as of 2018, approximately 360,000 acres of old-growth have been harvested on Prince of Wales; 169,000 of those 360,000 acres are currently in the stem-exclusion stage and another 115,000 acres are close to this stage. Studies on Prince of Wales Island show that deer densities on lands that have been logged for more than 30 years support 7 deer/km² compared to unmanaged (old-growth) lands, which support 12 deer/km².

The adoption of this proposal would have a limited impact on the harvest of deer in Unit 2 by both non-federally qualified subsistence users (NFQU) Alaska resident hunters and federally qualified subsistence users (FQU). In other words, local hunters would likely not be impacted. Only ~ 8% of all Unit 2 deer hunters harvested 4 or more deer from RY1997 to RY2024; the other 92% seem to average 1-2 deer per year and would not be impacted. Ideally, regulations between the state and Federal Subsistence Board (FSB) would be more aligned in Unit 2, but for FSB to lower deer harvest, the state would need to go first. Finally, we especially support proposals 40-41, which limit only non-residents. If the deer population is consistently low and subsistence is challenging, it's a no-brainer to limit non-resident harvest.

In short, the decreasing deer population is not a predator problem or a hunting problem, but a habitat problem. That being said, the predator seasons cannot be further liberalized without jeopardizing the Alexander Archipelago wolf population. The only thing we can do is reduce hunting (particularly of does) and stop old-growth logging.

Proposal 42: Modify the start date for deer in Unit 2 from August 1st to August 15th for nonresidents.

AWA SUPPORTS: This proposal would slightly reduce deer harvest opportunity for nonresidents during the early season. Given the complex habitat problems facing this deer population, reducing non-resident harvest opportunity (under the assumption that it reduces non-resident harvest) seems prudent.

Proposal 47: Eliminate the meat salvage requirement in May for black bears in Unit 2 for residents.

AWA OPPOSES: AWA is opposed, on principle, to killing wildlife without the intent of salvaging usable meat. This seems reflected in the department's comments summarizing conversations with Unit 2 hunters, *“Many hunters explained that they hunt black bears specifically for the value of the meat as a food resource, that they do not harvest any animal they do not intend to eat, and expressed discontent about wasted food resources”* (ADFG comments, page 107). The



Board has protected meat salvage requirements statewide for spring black bears harvested between January 1st and May 31st since 1996, and we see no reason why that needs to change now.

Importantly, the proponent states that the intent of this proposal is to encourage more black bear hunters to harvest black bears in Unit 2 to reduce predation on Sitka black-tail deer fawns. In other words, the intent is to liberalize the bear harvest requirements so broadly that the season effectively becomes an unofficial predator control program enacted by the public. This is problematic in that it attempts to circumvent the IM law requirements. It is also likely unhelpful to deer recovery. The department comments that it is unknown to what degree predation influences the deer population, and that there is no documentation that increasing black bear harvest will reduce predation. Finally, if this proposal passes it would make Unit 2 the only unit in the state in which the salvage of black bear meat would not be required for Alaska residents during the month of May.

Proposal 48: Increase the Unit 2 wolf population objective from 150-200 wolves to 200-300 wolves

AWA SUPPORTS: AWA strongly supports this proposal, as it is a near replica of our 2023 proposal 45, which requested to raise the population objective to 250-350 wolves and raise the threshold for closing the season when the wolf population reaches 200 wolves. AWA has consistently requested that the wolf population objective be raised in Unit 2 (in wolf and deer management meetings, litigation, and in BOG proposals) for exactly the same reasons the department now submits this proposal:

- The Unit 2 wolf population is reproductively isolated and has a high degree of inbreeding, which increases the potential for inbreeding depression. Wolves in Southeast have been generally isolated from other North American wolf populations for thousands of years, with slowly declining genetic diversity. Within Southeast Alaska, the Unit 2 population is the most reproductively isolated, with the lowest genetic diversity and the highest degree of inbreeding. These conditions signal an increased level of risk for Unit 2 wolves.
- The sustainable management of Unit 2 wolves requires consideration of both demographic and genetic factors; the number of wolves alone does not ensure a healthy population, as they must be genetically diverse.
- In lieu of managing for baseline genetic diversity, the department could (and should) manage for a larger Unit 2 wolf population than the current fall population objective. We suggest 250-350 wolves to align with historic objectives for this population, but 200-300 is a good start to potentially ward off irreparable genetic bottlenecks.



Until new information is available, maintaining the current larger population size is the best option to conserve existing genetic diversity and future management options. We appreciate the time and effort the department has recently taken to understand this wolf population and subsequently has taken a proactive approach to wolf management by submitting this proposal.

Proposal 51: Reduce the wolf trapping season in Unit 2 from 137 days to require a minimum 45 days in regulation.

AWA OPPOSES: 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. We appreciate that the current wolf trapping scheme varies year to year and does not give trappers a consistent season. Like the proposers, AWA does not generally support management seasons that are essentially determined via emergency order. That being said, AWA warned of the consequences of the Board's extremely liberal wolf trapping scheme in our numerous proposals at the last cycle. When this trapping season is managed by time alone, recent history reminds us that trappers can kill far more wolves than were intended by management. In 2019, trappers killed 165 wolves (of an estimated 170 wolf population) during a two-month season (only 15 days longer than what is requested in this proposal). A mandatory 45-day trapping season could result in large wolf harvests, repeating the mistakes of 2019 yet again. Given that the wolf population has been petitioned three times for ESA protections, and that the island population makes them more susceptible to a genetic bottleneck (inbreeding), we believe the department needs to keep the trapping season on a tight leash until the wolf population is genetically stable. We agree with the department comments that 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".

Proposal 53: Require all Unit 2 wolf trappers to pass an online wolf trapping education quiz prior to trapping wolves in Unit 2.

AWA SUPPORTS: We appreciate the goal of this proposal, which is to reduce the number of non-target animals in traps, particularly deer and black bears in Unit 2. We, like the department, have heard many reports of deer and bears getting caught in snares each year. AWA supports proposals that reduce incidental take, and strongly encourages the department to track the number of incidental take reports received, both before and after a quiz is implemented, to see if deer and bear entrapments are reduced.

Proposal 54: Require identification tags to be attached to traps and snares in Unit 2



AWA SUPPORTS: AWA generally supports trap identification requirements, as many other states have found that the practice increases compliance with trapping regulations and discourages setting traps in irresponsible locations. Trap ID regulations also have precedence in Alaska. We note that this would be challenging to enforce, given that FSB regs do not require ID. However, FSB regulations are rarely ever more restrictive than the state. If the state enacted a regulation, it is more likely that FSB regs would follow. Finally, ID tags would not need to have the trapper's information on the tag, but could use a number tied to their license available only to law enforcement.

Proposal 55: Prohibit the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Unit 2.

AWA SUPPORTS: AWA strongly opposed the regulation change that allows FLIR Statewide in 2025. A FLIR detects infrared radiation emitted from a heat source by using thermal or infrared technology to create a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. FLIR technology is available in handheld cameras and cameras that can be attached to a smartphone, goggles, or rifle scopes - they are widely available and easy to use. Night vision devices and FLIR devices provide aid to trappers, allowing identification of and locating animals from far away through barriers such as snow and darkness, including big game. FLIR had only been legal in the Interior for one year, so the impacts of the change are widely unknown (i.e. take of big game using FLIR), yet were hastily applied to the whole state. Almost every - if not all- of the Southeast ACs opposed the Statewide FLIR regulation, asking for a regional exemption due to poaching concerns. We share the proposer's concern that there is potential to abuse the use of FLIR or night vision to aid in the taking of big game, particularly in Unit 2 where the deer population is struggling.

Proposal 56: Prohibit the use of enhanced night vision and forward-looking infrared devices for taking furbearers in Unit 2 during any open deer season.

AWA SUPPORTS: AWA strongly opposed the regulation change that allows FLIR Statewide in 2025. A FLIR detects infrared radiation emitted from a heat source by using thermal or infrared technology to create a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and use advanced image correction technology. FLIR technology is available in handheld cameras and cameras that can be attached to a smartphone, goggles, or rifle scopes - they are widely available and easy to use. Night vision devices and FLIR devices provide aid to trappers allowing identification of and locating animals from far away through barriers such as snow and darkness, including deer. FLIR had only been legal in the Interior for one year, so the impacts of the change are



widely unknown (i.e. take of big game using FLIR), yet were hastily applied to the whole state. Almost every - if not all- of the Southeast ACs opposed the Statewide FLIR regulation, asking for a regional exemption due to deer poaching concerns. We share the proposer's concern that there is potential to abuse the use of FLIR or night vision to aid in the taking of deer, particularly in Unit 2.

Proposal 57: Open an antler restricted registration hunt for bull elk with 3 points on either side, and season dates of the first Saturday in November to the third Sunday in November.

AWA OPPOSES: The Zarembo elk population is estimated to be fewer than 50 total animals. If this proposal were adopted, the long-term stability of the elk herd could be jeopardized, especially because the department anticipates that harvest success would be higher on Zarembo Island than on Etolin Island because of widespread access via logging roads and higher visibility of elk along shorelines. The hunt structure, as proposed, would include most bulls older than 1.5 years old in the population, which would likely not be sustainable and lead to a conservation concern. AWA does not believe this population needs more hunting pressure, as the department also maintains concern that elk are being illegally harvested on Zarembo Island during the Etolin Island drawing and registration permit hunts. This additional unreported harvest from a relatively small population of elk compromises the long-term stability of the Zarembo Island elk herd.

Proposal 58: Create an unlimited registration permit elk hunt on Zarembo Island with a bag limit of one elk with a season of August 1 to November 30.

AWA OPPOSES: Adopting an unrestricted registration hunt on this population of ~50 animals would not be sustainable, and would further exacerbate existing conservation concerns of illegal harvest and high hunting access.

Proposal 64: Eliminate the regulation that excludes broken, damaged, or altered antlers from the definition of spike-fork antlers for Units 1B, 1C, and 3.

AWA OPPOSES: The impacts of this proposal, if adopted, are already known to be detrimental to the moose population. In 2006, the "damaged, broken or altered" antler regulation was deemed necessary for this hunt to exclude the harvest of bulls whose antlers only satisfied the antler point requirements as a result of either naturally occurring breaks. Prior to that "broken, damaged, or altered antler" regulation, bulls were harvested with broken antlers, or antlers were intentionally modified after harvest to conform to the point requirements specified in the spike-fork requirements. Those antler modifications, which would likely resurface if this proposal passed, circumvented the intent of the antler restrictions,



compromised the selective harvest strategy, and posed a potential threat to the future productivity of the herd. AWA shares the department's concerns that this proposed change would likely lead to a harvest and population decline as the number of legal bull moose in the population are hunted out.

Proposal 66: Change the bag limit for brown bears in Unit 4 from one bear every 4 regulatory years to one bear every regulatory year.

AWA OPPOSES: Population estimates are not available for brown bears in Unit 3. Because of uncertainties about the size of the bear population (though it appears small), and in an effort to limit hunting pressure, the Unit 3 brown bear season is open only to Alaska residents. Between 2015–2024, hunters sealed 7 brown bears, 4 were killed under the defense of life and property provision, and 2 were killed illegally. That means about half of the reported bear harvest was outside of the current hunting season (DLPs + illegal). Tripling the bag limit for this population, especially given the ratio of non-season bear kills, simply doesn't make sense. Finally, the current Unit 3 harvest objective is to limit the annual harvest to no more than 3 bears. If this proposal is adopted, one person could legally harvest the entire unit's brown bear harvest objective in one year.

Proposal 69: Change the season dates for grouse in Unit 3 by adding an additional 4 weeks in the spring for residents and nonresidents.

AWA OPPOSES: Grouse hunters already have a 9.5-month hunting season. Recognizing the majority of grouse are taken in the spring, extending the hunting season for grouse to June 15 will result in harvest during the nesting period and very likely the early brood rearing period. Any additional harvest of females during the latter part of the nesting season and early brood-rearing period would likely result in a conservation concern.



The Alaskan Bowhunters Association

Comments to the Alaska Board of Game

Southeast Region

Wrangell, AK. January 23-27, 2026

Submitted January 9, 2026

On behalf of the Alaskan Bowhunters Association (ABA), we appreciate the opportunity to submit comments to the Alaska Board of Game. The ABA is committed to preserving and promoting bowhunting opportunities for all hunters throughout the State of Alaska while supporting the Board's constitutional mandate for sustained yield and science-based wildlife management. Bowhunting has consistently demonstrated its effectiveness as a management tool due to inherently lower harvest rates, increased hunter selectivity, and minimal population-level impacts. Archery-only seasons and hunts provide an important means of maintaining reasonable hunting opportunity while meeting conservation objectives. As such, bowhunting should be fully considered as a preferred management alternative prior to reducing permit levels, eliminating general hunts, or implementing closures. Maintaining or expanding archery-only opportunities allows the Board to balance conservation needs with continued public participation in hunting, ensuring long-term population sustainability while providing meaningful opportunity for Alaska's hunters.

Proposal 34 - Neutral

The ABA supports the concept of expanding hunting opportunity where bowhunting can be used to provide access in areas where opportunity currently does not exist, particularly when it can be reasonably implemented in a manner consistent with public safety and biological sustainability. Archery-only hunts have successfully been used in other populated areas of the state to maintain hunting opportunity while minimizing overall harvest impacts and addressing safety concerns associated with firearm use. At the same time, the ABA recognizes and respects the Alaska Department of Fish and Game's concerns regarding the potential for wounded game near highly populated areas. These concerns represent legitimate management and public safety considerations that must be carefully weighed by the Board. Given both the potential benefits of creating a new archery-only opportunity in Unit 1C and the Department's stated concerns regarding implementation and outcomes, the ABA maintains a **neutral** position on Proposal 34. Should the Board consider moving forward, the ABA encourages careful evaluation of area-specific conditions, enforceability, and any



phased or limited approaches that could allow archery opportunity while addressing safety and management concerns. We appreciate the Board's consideration of Proposal 34 and its continued efforts to balance conservation, public safety, and reasonable hunting opportunity

Proposal 35 - Neutral

The ABA supports the concept of expanding hunting opportunity where bowhunting can be used to provide access in areas where opportunity currently does not exist, particularly when such opportunities can be reasonably implemented in a manner consistent with public safety and biological sustainability. Archery-only hunts have been successfully utilized in other areas of the state to provide hunting opportunity while limiting overall harvest impacts and reducing safety concerns associated with firearm use. At the same time, the ABA recognizes and respects the Alaska Department of Fish and Game's concerns regarding the potential for increased conflicts resulting from wounded game moving between adjacent private properties. These concerns represent legitimate implementation and public safety considerations that must be carefully evaluated, particularly in areas near residences and road systems. The ABA also encourages the Board to consider that, when used within ethical distances and with correct shot placement, modern legal archery equipment is a highly effective and lethal method of take for big game, and is not inherently less lethal than firearms. Given both the potential benefits of creating a limited archery-only opportunity along Thane Road in Unit 1C and the Department's stated concerns regarding wounded game and property-related conflicts, the ABA maintains a **neutral** position on Proposal 35. Should the Board consider moving forward, the ABA encourages careful consideration of area-specific conditions, enforceability, and any measures that could minimize conflict, such as clearly defined boundaries or limited approaches. We appreciate the Board's consideration of Proposal 35 and its continued efforts to balance conservation, public safety, and reasonable hunting opportunity.

Proposal 63 - Oppose

The ABA **opposes** this proposal to adjust the season dates for the DE318 elk hunt and to open an additional September drawing hunt in Unit 3. The reduced harvest rate cited in this proposal is not a management failure—it is the very reason the DE318 archery-only hunt has been structured to allow a higher number of permits while maintaining sustainable harvest levels. Bowhunting has been intentionally and effectively used here as a management tool to provide broad opportunity with lower per-hunter success, rather than concentrating harvest among fewer individuals. The current DE318 season



reflects a deliberate allocation choice that prioritizes opportunity over efficiency. The lower success rates inherent to archery equipment allow managers to issue more permits without risking overharvest, thereby increasing participation and maintaining access for a greater number of hunters. Importantly, this archery-only hunt does not exclude participation—any hunter willing to meet bowhunter certification requirements can take advantage of the opportunity under the existing framework. The proposed change would also shift the timing of opportunity in a way that disproportionately affects archery hunters. Under this proposal, hunters using firearms would be allowed to pursue elk during the peak of the rut, when elk are more vulnerable and harvest success is naturally higher, while bowhunters would be largely confined to the earlier portion of September. This would further amplify success rates for firearm hunters and would require additional reductions in permit numbers to prevent overharvest. Opening a higher-success hunt during the rut fundamentally alters the intent of the existing management strategy and moves the allocation away from opportunity and toward efficiency. This raises an important question for the Board: is it more appropriate for fewer hunters to harvest more animals, or for more hunters to have the opportunity to pursue game under a sustainable framework? The ABA believes the current DE318 structure appropriately answers this question by maximizing participation while maintaining conservation objectives. Bowhunting has repeatedly demonstrated its value as a low-impact, highly controllable management tool, particularly in situations where managers seek to maintain opportunity without increasing harvest pressure. The existing DE318 hunt already achieves sustainable management of the Etolin Island elk population, and altering it risks reducing hunter participation without providing a corresponding conservation benefit. For these reasons, the ABA strongly opposes this proposal and encourages the Board to retain the current DE318 season structure as an effective and intentional use of archery-based management

Proposal 67 - Support

The ABA supports proposals that expand reasonable hunting opportunity through archery-only methods where they can be implemented safely and responsibly, particularly in areas where proximity to roads, homes, and other development makes firearm use less appropriate. Archery-only hunting has a long and successful history in Southeast Alaska as an effective management tool that provides access to abundant game populations while maintaining low overall harvest impacts. The ABA recognizes that hunting in areas with a high prevalence of residences, private land, and public use has the potential to create user conflicts and public safety concerns. The Petersburg Management Area (PMA) was specifically designed to address these issues through well-defined boundaries, required bowhunter certification, and established distance buffers from dwellings, roads, and other sensitive areas. This regulatory framework has





proven effective in balancing hunting opportunity with public safety and minimizing conflicts among user groups. Adding the existing Petersburg Road System Closed Area to the PMA would create greater regulatory consistency while extending archery-only opportunity into an area with higher-than-normal deer densities and heavy vehicle traffic—conditions that are well suited to archery harvest rather than firearm use. When conducted within ethical distances and with proper shot placement, modern legal archery equipment is a highly effective and lethal method of take for big game, and its use within the PMA has demonstrated that such opportunity can be provided responsibly in close proximity to developed areas. Provided there are no outstanding public safety or enforcement concerns, the ABA **supports** Proposal 67 and encourages the Board to consider the PMA as a proven model for managing user conflicts while maintaining conservation objectives and reasonable hunting opportunity. We appreciate the Board's consideration of Proposal 67 and its continued efforts to balance sustained yield, public safety, and access for Alaska's hunters.

Proposal 68 - Support

The ABA supports proposals that expand reasonable hunting opportunity through archery-only methods where they can be safely and responsibly implemented, particularly in areas near roads and developed corridors where firearm use presents heightened public safety concerns. Archery-only hunting has a proven track record in Southeast Alaska as an effective management tool that provides hunting access while maintaining low overall impacts on wildlife populations. The ABA recognizes that the Blind Slough area is heavily used by a variety of user groups, including sport fishermen, wildlife viewers, and local residents, and that opening the area to hunting has the potential to create user conflicts and public safety concerns if not carefully structured. The Petersburg Management Area (PMA) was specifically designed to address these issues through clearly defined boundaries, mandatory bowhunter certification, and established distance buffers from dwellings, roads, and other high-use areas. This framework has demonstrated that archery-only opportunity can be provided in close proximity to public use areas while minimizing conflict and maintaining public safety. Incorporating the Blind Slough Closed Area into the PMA would create regulatory consistency and extend archery-only opportunity into an area with high deer use near the highway, while remaining subject to the same safeguards that currently govern the PMA. When conducted within ethical distances and with proper shot placement, modern legal archery equipment is a highly effective and lethal method of take for big game, and its use within the PMA has shown that such opportunity can be implemented responsibly in multi-use landscapes. If the Board determines that there are outstanding concerns related to the potential harvest of species such as moose, bears, or wolves, the ABA encourages consideration of amended or clarifying language to address those



concerns rather than rejecting the proposal in its entirety. Such adjustments could allow the primary intent of the proposal—providing additional archery opportunity for deer while maintaining public safety and conservation objectives—to be met in a measured and responsible manner. Provided there are no unresolved public safety or enforcement concerns, the ABA supports Proposal 68 and appreciates the Board's continued efforts to balance sustained yield, public safety, and reasonable hunting opportunity.

Thank you for the opportunity to comment and for your continued service. The Alaskan Bowhunters Association appreciates the Board's consideration of these comments and its commitment to sustained yield and reasonable hunting opportunity.

Sincerely,

Mike Harris

Legislative Vice President

Alaskan Bowhunters Association





PC5

Name: John Baciocco

Community of Residence: Sitka

Comment:

Proposal 23: Oppose

I am a 30 year resident of Sitka. I'm concerned that increasing the limit to four deer for non-residents will adversely affect deer populations in game unit four. Increasing the limit has the potential to increase the numbers of nonresident hunters. I'd hate to see game unit four become congested with hunters, much like the often competitive and congested angling experience currently is due to the busy nonresident sport fishing . Thank you for considering my input.

John Baciocco.

Sitka, Alaska



**BACKCOUNTRY
HUNTERS & ANGLERS
ALASKA**



PC6
1 of 4

Alaska Board of Game
ADF&G Boards Support Section
ATTN: Board of Game Comments
P.O. Box 115526
Juneau, AK 99811-5526
[REDACTED]

January 9, 2026

Re: Board of Game Proposals: 3, 6, 8, 14, 26

To the Alaska Board of Game,

The Alaska Chapter of Backcountry Hunters and Anglers (AK BHA) works to conserve Alaska's wild public lands, waters, fish and wildlife.

Proposal 3: AK BHA OPPOSES Proposal 3, Allow the same day airborne take of goats in Units 1-5.

Under Alaska's big game laws, a person who has been airborne may not take or assist in taking a big game animal (including goats and sheep) until after 3:00 a.m. the following day after flying in a non-commercial aircraft. This is often called the *same-day airborne* prohibition and applies statewide unless a specific exemption applies. There are some specific restrictions attached to certain species during particular seasons (e.g., sheep), but no current general rule in Alaska authorizes same-day airborne taking of goats or sheep in any unit, and is standard practice.

Allowing same-day airborne hunting for mountain goats in Units 1–5 would be inconsistent with Alaska Department of Fish & Game's long-standing emphasis on conservative management of slow-reproducing species and the Board of Game's obligation to ensure sustained yield. Same-day airborne restrictions are a core regulatory tool used to limit harvest efficiency, maintain hunter selectivity, and prevent aircraft from functioning as a hunting aid rather than a means of transportation. Arguments based on convenience, cost reduction, or scheduling constraints do not address a biological or conservation need and are not consistent with ADF&G's science-based management framework.

ADF&G has repeatedly identified adult female (nanny) survival as the most influential factor in mountain goat population stability, particularly in Southeast Alaska where



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populations are constrained by limited alpine habitat, severe winter conditions, and naturally restricted access. Same-day airborne allowances would increase the likelihood of immediate harvest following aircraft-assisted access, reduces selectivity and increases the risk of female harvest. This would shift management away from effort-based limitations toward increased take efficiency—an approach that is inappropriate for a species with low reproductive potential and high sensitivity to overharvest.

From a management perspective, weather-related access limitations are not a problem to be solved but an integral component of harvest regulation that naturally moderates pressure and supports sustainable opportunity over time. Removing same-day airborne restrictions would undermine this conservation buffer and introduce additional enforcement challenges while providing no demonstrable benefit to population health or long-term opportunity.

Adopting convenience-based justifications for regulatory exemptions sets a precedent that conflicts with existing ADF&G policy and Board of Game findings for other alpine species, including sheep. Alaska's same-day airborne restrictions remain an essential and effective tool to ensure ethical harvest, precautionary management, and continued public confidence in mountain goat conservation.

Same-day airborne hunting is not a safety measure, not an access-equity solution, and not a conservation tool.

Proposal 8: AK BHA SUPPORTS Proposal 8 as a precautionary, science-based approach to managing the emerging presence of cougars in Southeast Alaska. Establishing a regulated hunting season with conservative limits, mandatory salvage and sealing requirements, and protections for females with kittens is consistent with Alaska Department of Fish & Game's adaptive management framework and the Board of Game's obligation to manage wildlife for sustained yield.

ADF&G emphasizes early monitoring and data collection when species expand into new ecosystems. The proposed season structure of one cougar per regulatory year, required skull and hide salvage, and sealing within 15 days, provides an enforceable mechanism to collect biological data on sex, age, distribution, and residency status. This information is necessary to determine whether cougars in Southeast Alaska are transient dispersers or becoming established.

Cougars are efficient ambush predators, and Southeast Alaska prey species have not evolved with this predation strategy. Implementing a limited, regulated harvest allows managers to respond proactively to potential ecological impacts while maintaining ethical harvest standards. Prohibiting the take of females with kittens and spotted kittens appropriately safeguards reproductive capacity and aligns with conservative population management.

Proposal 8 balances opportunity with restraint, supports fair chase, and provides a data-driven management tool without presuming population establishment. AK BHA supports



this proposal as a responsible and measured response that maintains public trust and aligns with ADF&G's science-based wildlife management principles.

Proposal 14: AK BHA SUPPORTS Proposal 14 as a measured, science-informed adjustment to fisher management in Southeast Alaska. **Increasing the seasonal bag limit from one to three fishers** provides a conservative expansion of opportunity while maintaining appropriate harvest controls, data collection, and population safeguards consistent with Alaska Department of Fish & Game's adaptive furbearer management framework.

ADF&G has emphasized that fisher distribution in Southeast Alaska is expanding, with increased sign, incidental capture on traplines, and habitat conditions trending more favorable due to reduced snow depth (with this current winter being an outlier, thus far) and changing forest structure. A limited increase in bag limit recognizes these observed trends while avoiding the risks associated with unlimited harvest in a population that is still being actively evaluated. Importantly, a capped bag limit of three fishers, retains critical management structure. A finite bag limit helps regulate harvest pressure, supports reliable harvest-based monitoring, and avoids the loss of meaningful effort and trend data that can result from unlimited take. This approach aligns with precautionary management principles and allows for responsive regulatory adjustment as additional data become available.

Fisher are frequently taken incidentally in marten and wolverine sets, and increasing the bag limit provides value to trappers while incentivizing accurate reporting and cooperation with ADF&G. Expanded harvest opportunity can improve biological sampling and data collection related to distribution, diet, age structure, and potential interactions with marten populations. This information that is essential given the importance of marten to Southeast Alaska trapping.

Proposal 14 represents a balanced, data-driven approach that supports continued research, responsible utilization, and long-term conservation of trapping opportunities. AK BHA supports this proposal as a prudent adjustment that advances sustainable use while maintaining science-based oversight.

Proposal 26: AK BHA SUPPORTS Proposal 26 Restrict hunters who take nanny goat in Unit 1C from hunting goat in Unit 1C for the following four regulatory years, and require nonresidents to forfeit nanny goats taken. These rules are not unique to Unit 1C and illustrate how ADF&G has applied conservation-oriented restrictions in other mountain goat management units:

1. Units 7 & 15 (Seward/Kenai Peninsula):

Under current regulations, if a hunter harvests a nanny goat in Units 7 or 15, that hunter is prohibited from hunting goats in Units 7 and 15 for five regulatory years.





This applies to both residents and nonresidents and is intended to conserve nannies and maintain sustainable harvest levels.

2. Unit 6 (Central/Southcentral Alaska):

Some permit hunts in **Unit 6** include similar conditions, e.g., a regulation stating that if a hunter harvests a nanny goat, they are prohibited from hunting goats in that unit for five regulatory years. This has been part of specific registration/permit hunt conditions in portions of Unit 6.

The Unit 1C proposal would extend this type of harvest discipline to southeast Alaska by restricting hunters who take a nanny in 1C from hunting goats in that subunit for four regulatory years and requiring nonresidents to forfeit nanny goats taken

Thank you to the Board of Game for your deliberation and careful consideration of these proposals.

On behalf of the Alaska Chapter of Backcountry Hunters & Anglers,

Mary Graves
Alaska Chapter Coordinator
[REDACTED]
glaves@backcountryhunters.org





Name: Kaleb Baird

Community of Residence: Petersburg, AK

Comment:

Submitting a PDF of higher quality maps for proposals 67 and 68 in hopes that they can be attached to the department maps on the meeting website.

Proposal 3: Oppose

Opposed based on fair chase principals.

Proposal 5: Support with Amendment

Support if amended to residents-only. The department has well defined GHL's throughout the unit and can manage accordingly to ensure over-harvest does not occur. Many folks who hunt in Unit 1 simply want the ability to hold a brown bear tag annually in the event a bear is encountered on a hunt targeting other species.

Proposal 6: Support

As a Petersburg resident this would align all our local wolf hunting dates.

Proposal 7: Support

As a Petersburg resident this would align all our local wolf hunting dates.

Proposal 8: Support with Amendment

I support this proposal with an amendment that would not open a sanctioned department managed hunt, but to add mountain lions to the regulations similarly as white tailed deer and mule deer and/or unclassified game are at the rear of the regulations booklet. It should not be illegal to harvest a migratory and non-native big game species.

Proposal 18: Support with Amendment

Support with an amendment of the season dates that include June 15 closure and not May 31 as to allow ample time for school kids to hunt grouse at the beginning of summer break. Prefer proposal #69 to this proposal.

Proposal 19: Support

Authored proposal. Refer to proposal for comments.

Proposal 26: Oppose I oppose this proposal as written. The language regarding nanny harvest for nonresidents and subsequent confiscation is confusing. A four year waiting period for a legal resident harvest is extreme and sets a bad precedent. It does not model proposal 32 from the last Southeast Region cycle as it suggests, which was a much more acceptable set of criteria that included a one year suspension for residents and billy-only qualifications for nonresidents.

Proposal 34: Support

Support archery opportunity for certified bowhunters who have passed educational and shooting proficiency exams to hunt in areas where firearms may not be acceptable.

Proposal 35: Support

Support archery opportunity for certified bowhunters who have passed educational and shooting proficiency exams to hunt in areas where firearms may not be acceptable.

Proposal 44: Oppose

This would create a separate draw code for nonresidents and guarantee nonresidents a tag in years where the quota is high enough. For that reason I am opposed.

Proposal 45: Oppose

This would create a separate draw code for nonresidents and guarantee nonresidents a certain number of tags in years where the quota is high enough. For that reason I am opposed.

Proposal 46: Oppose

This would create a separate draw code for nonresidents and guarantee nonresidents a tag in years where the quota is high enough. For that reason I am opposed.

Proposal 57: Oppose

Would create an enormous amount of effort from multiple communities on a very small and isolated population. Potentially hundreds of hunters in search of a relatively small number of legal bulls in a concentrated area. Creates very high likelihood of user conflict and safety concerns. Expands opportunity for illegal harvest on herd that sees exceptionally high occurrence throughout its history of illegal take. Through conversations with department staff and other hunters familiar with the herd and island, current concern for the deer herd because of elk encroachment is not as uniform as it might seem otherwise.

Proposal 58: Oppose

Would create an enormous amount of effort from multiple communities on a very small and isolated population. Potentially hundreds of hunters in search of a relatively small number of elk in a concentrated area. Creates very high likelihood of user conflict and safety concerns. Expands opportunity for illegal harvest on herd that sees exceptionally high occurrence throughout its history of illegal take. Would effectively initiate a hunter-driven eradication of this herd. Through conversations with department staff and other hunters familiar with the herd and island, current concern for the deer herd because of elk encroachment is not as uniform as it might seem otherwise.

Proposal 59: Oppose

Opposed as it would create a separate nonresident draw code and allow for a guaranteed number of draw tags for nonresidents that they may not draw otherwise.

Proposal 60: Oppose

Opposed as it would create a separate nonresident draw code and allow for a guaranteed number of draw tags for nonresidents that they may not draw otherwise.

Proposal 61: Oppose

Opposed as it would create a separate nonresident draw code and allow for a guaranteed number of draw tags for nonresidents that they may not draw otherwise.

Proposal 62: Oppose

Opposed as it would create a separate nonresident draw code and allow for a guaranteed number of draw tags for nonresidents that they may not draw otherwise.

Proposal 64: Oppose

This rule came about because of foul play in seasons past which is reasonable to expect would still be an issue if removed. If the proposer and/or constituents want these criteria discussed for only the Stikine River portion of the RM038 hunt they should propose separating that region from the rest of Unit 3/1B/1C portions of RM038 and have that discussion separately from other regions of the hunt where antler judging concerns are seemingly far less of an issue.

Proposal 65: Oppose

Strongly oppose shortening season length of a currently highly successful and popular hunt. If the proposer and/or constituents want these criteria discussed for only the Stikine River portion of the RM038 hunt they should propose separating that region from the rest of Unit 3/1B/1C portions of RM038 and have that discussion separately from other regions of the hunt where antler judging concerns are seemingly far less of an issue.

Proposal 66: Support

Unit 3 brown bear management differs from all other brown/grizzly bear units in the state in that nonresident hunting is prohibited. Considering there are no commercial aspects to this hunt, and the department has the ability to manage to a well defined GHL, a waiting period following a successful harvest is unwarranted. The overwhelming sentiment with regard to brown bears in unit 3 is that many moose, deer, and grouse hunters simply want the opportunity to possess a tag annually in the event a brown bear is encountered during a hunt for their target species. Over harvest is not a concern.

Proposal 67: Support with Amendment

The Petersburg Management Area is a long standing and successful portion of Mitkof Island where certified bowhunters are allowed to big game hunt near residential and recreational settings with a proven history of little to no user conflicts. Adding the Highway Closed Area to the PMA provides increased opportunity for these certified bowhunters in a much more remote portion of Mitkof Island near where highway vehicles are allowed top speeds and deer densities are greatest. Considering certified bowhunters are required to meet both educational and shooting proficiency standards before partaking in PMA hunting activities concerns regarding wounding, trespassing, user conflicts, and/or wildlife management are unfounded. Contrary to the name, the "Highway Closed Area" is not truly closed to hunting as there are allowances for wolf hunting, waterfowl and small game within the Closed Area currently, which do not include a 100 yard buffer from highways, roads or streets stipulation as does the PMA. It is currently simply off limits to all deer, moose and bear hunters as written. The opportunity provided by adopting the Highway Closed Area for certified deer hunters would greatly outweigh any loss in opportunity for wolf, small game and waterfowl hunters as those seasons are all open concurrently outside the closed area. Deer hunting on Mitkof Island outside the PMA is only allowed for five weeks while the PMA offers a total opportunity of roughly 18 weeks, including the entirety of the mating season. There is little incentive for bowhunters to hunt in high traffic recreational areas and the intrigue with this closed area lies in the portions that see little to no current recreation from any other user group.

***When this proposal was written I was under the impression that small game and waterfowl were classified separately in Alaska as they are in a number of other states. If adopted, I would ask that the “small game may be taken by falconry” is removed from the PMA regulations. Through extensive conversations and thorough discussion at AC meetings I have heard of no support or opposition from falconers and am unaware of any falconers in the Petersburg community. ***

Proposal 68: Support with Amendment

The Petersburg Management Area is a long standing and successful portion of Mitkof Island where certified bowhunters are allowed to big game hunt near residential and recreational settings with a proven history of little to no user conflicts. Adding the Blind Slough Closed Area to the PMA provides increased opportunity for these certified bowhunters in a much more remote portion of Mitkof Island near where highway vehicles are allowed top speeds and deer densities are greatest. Except for the Crystal Lake Fish Hatchery the south half of the Blind Slough Closed Area is extremely remote and sees almost no recreational activity of any kind. Likewise the timbered portions to the north of the highway provide little recreational opportunity otherwise. This area is exceptional moose, deer and bear habitat. Considering certified bowhunters are required to meet both educational and shooting proficiency standards before partaking in PMA hunting activities concerns regarding wounding, trespassing, user conflicts, and/or wildlife management are unfounded. Because of the language in the PMA regulations regarding 100 yard buffer around highways, roads and streets, a much larger no-hunting zone than simply a 100 yard radius surrounding the Swan Observatory would result under those criteria. The way the highway and slough parallel each other through this part of the Blind Slough Closed Area makes it so bowhunters would have no ability/reason to hunt within many hundreds of yards of the Swan Observatory on the Blind Slough side of the highway. There is little incentive for bowhunters to hunt in high traffic recreational areas and the intrigue with this closed area lies in the portions that see little to no current recreation from any other user group.

When this proposal was written I was under the impression that small game and waterfowl were classified separately in Alaska as they are in a number of other states. If adopted, I would ask that the “small game may be taken by falconry” is removed from the PMA regulations. Through extensive conversations and thorough discussion at AC meetings I have heard of no support or opposition from falconers and am unaware of any falconers in the Petersburg community.

Proposal 69: Support

As author of proposal 69 I'd like to make it abundantly clear the intent behind attempting to expand hunting opportunity is not to harm or impair sooty grouse populations in unit 3. The spring sooty grouse hunt in Southeast is unique in that the vast majority of the harvest comes from specifically targeting males during the breeding season as shown by the department's wing survey. This hunt is more comparable to a wild turkey hunt than any other Alaskan upland species. Thus I feel it is disingenuous to compare other season dates and harvest trends of other grouse species from around the state. The basis of the proposal is that sooty grouse hunting is a popular recreational option during a time of the year when other hunting options are limited. Further, the current dates result in a season closure during the very best time to hunt male sooty grouse, often when road access in Southeast Alaska is reopening from winter snowpack, and before kids have completed their school year. While I appreciate the department's criteria in keeping season dates uniform when possible, this proposal was made for unit 3 specifically because of considerations for other grouse species in Southeast Alaska as well as other social dynamics with regard to larger human populations and more limited road systems of units 1 and 4.

Considering the other proposal to expand the spring opportunity from an advisory committee also in unit 3 and in discussions with local Petersburg grouse hunters I can confidently say there is significant interest in lengthening the season to encompass more of the prime hunting period. Having said that I also recognize the hesitations of many stakeholders surrounding more effort during the breeding season. If the board does not see fit to adopt this proposal as written I'd ask that it is used to create some sort of suitable compromise to allow for more opportunity. I personally feel strongly about the June 15 extension as to give school kids of unit 3 ample time at the beginning of summer break to enjoy grouse hunting. If the board sees fit to add a "sunset clause" to this proposal to allow for at least four to five years (two BOG cycles) of data collection regarding this extension and/or even go so far as to make the May 16-Jun 15 portion youth-only, I would find both options acceptable for amendment. Once again I understand the importance of science based data and reasoning that drives these decisions, but must point attention to the sooty grouse profile on the department's own website that states, "Heavy hunting pressure is never exerted over a large enough area to be responsible for the widespread (population) changes." I do not believe the department has the data/research to suggest definitively that a 30 day extension would significantly affect unit 3 grouse populations and feel that the prevailing argument to keep the current structure is one that prioritizes a moral or ethical standard rather than a management decision based on maximum sustainable yield and opportunity.

8.75 mile marker



PC7
6 of 12

Highway Closed Area Map 1





STATE OF ALASKA

Highway Closed Area Map 2

ALASKA MENTAL
HEALTH TRUST

Closed Area

Closed Area

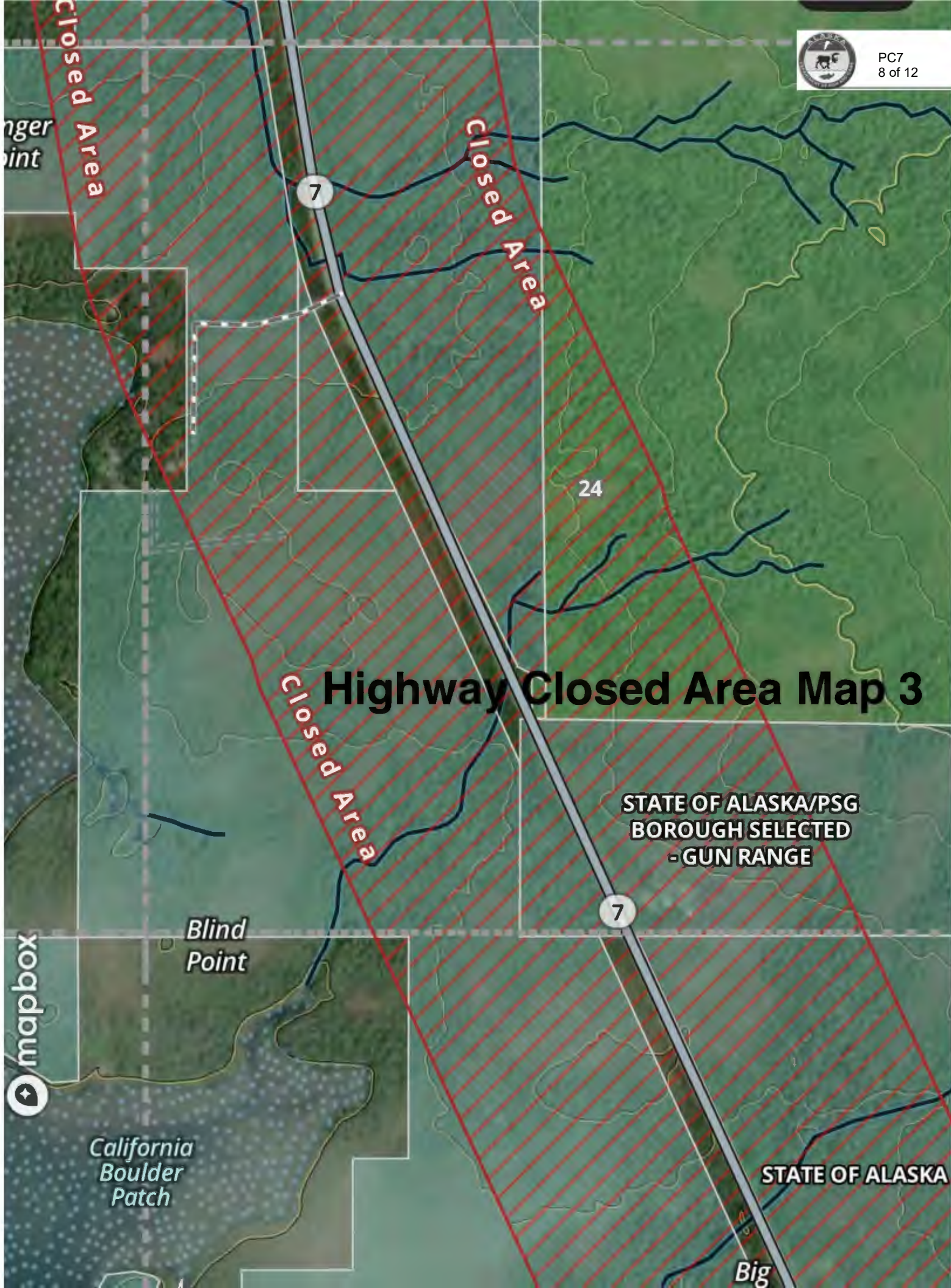
Rock
Point

14

Big
Boulder

ALASKA, STATE OF

ALASKA, STATE OF



Highway Closed Area Map 3

STATE OF ALASKA/PSG
BOROUGH SELECTED
- GUN RANGE

Blind
Point

California
Boulder
Patch

STATE OF ALASKA

Big



Big
Gulch

25

30

Closed Area

40000

200ft



Blind Slough
Trailhead



Blind River
Rapids Shelter



Highway Closed Area Map 1

.79mile

Closed Area

North Blind River

TONGASS
NATL FOREST

Closed Area

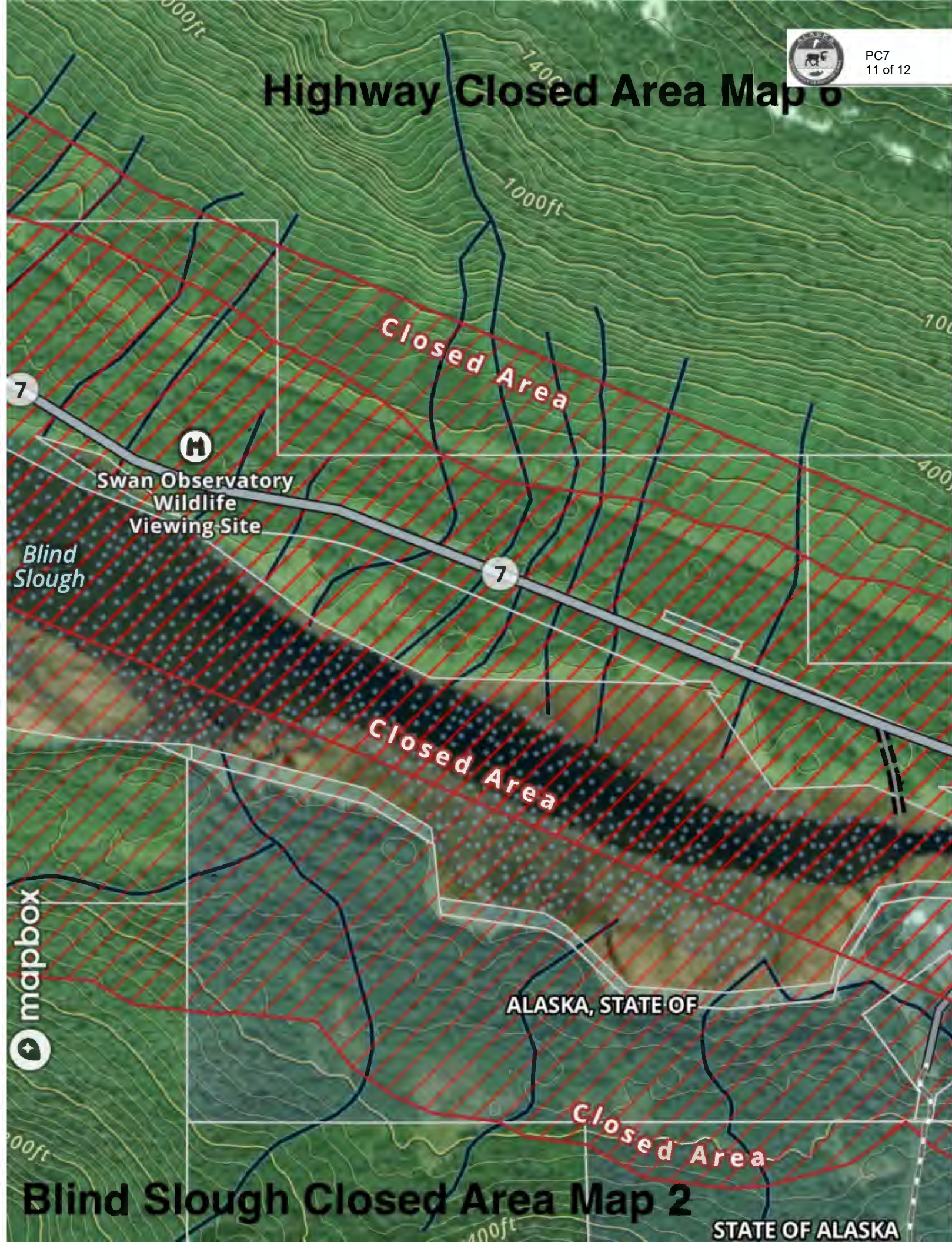
Blind
Slough



Blind Slough Closed Area Map 1



Highway Closed Area Map 6

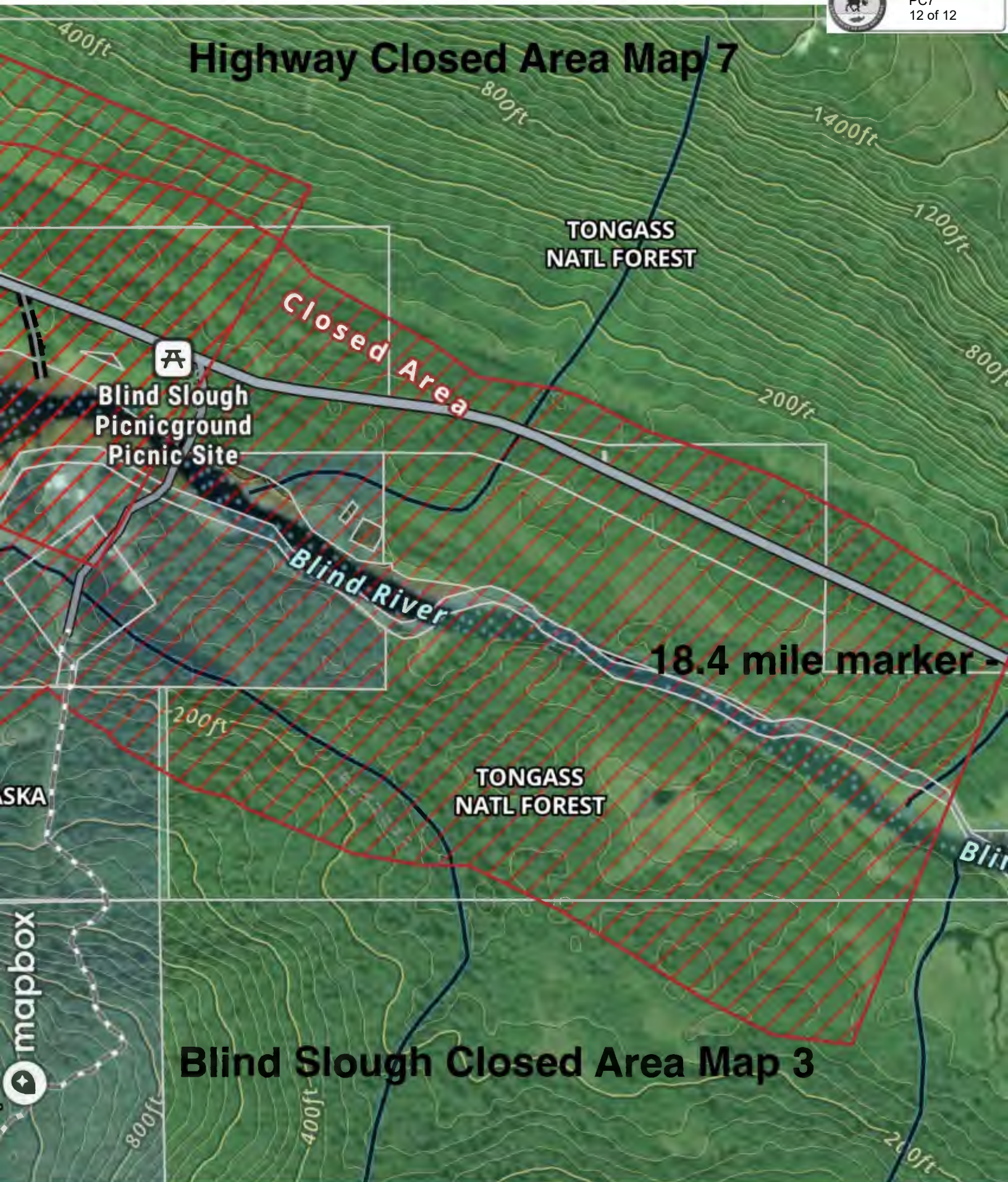


Blind Slough Closed Area Map 2

STATE OF ALASKA



Highway Closed Area Map 7



Blind Slough Closed Area Map 3



Name: Shannon M Baird

Community of Residence: Petersburg

Comment:

Proposal 3: Oppose

It doesn't allow for fair chase.

Proposal 4: Support

Agree, this is an more ethical definition of taken.

Proposal 5: Support with Amendment

I support this if it is amended to resident only.

Proposal 6: Support

This would align with Unit 3 we have plenty of wolves.

Proposal 7: Support

This would align with Unit 3 we have plenty of wolves.

Proposal 8: Support with Amendment

I support if amended to include mountain lion regulations similarly as those of white tail and mule deer. So that it is not illegal to harvest them, but also not necessary to be managed and regulated.

Proposal 16: Oppose

September is a good time for waterfowl hunting.

Proposal 18: Support with Amendment

I would support with an amendment to June 15th closure. But I'd rather proposal 69 be adopted.

Proposal 19: Support

This would align with other brown bear hunts in the region.

Proposal 26: Oppose Four years is too extreme for a legal nanny harvest.

Proposal 57: Oppose

I have safety concerns under this hunt structure for the hunters. And it would not be a sustainable opportunity to hunt.

Proposal 58: Oppose

This would decimate the elk heard. Which is not the desire of myself and hunters like me.

Proposal 64: Oppose

I think this likely would encourage the harvest of illegal bulls.

Proposal 65: Oppose

This does not provide enough time and opportunity. And the current regulations are managing the population and providing ample opportunity, supported by another record harvest year in 2025.

Proposal 66: Support

Local deer and moose hunters would like the opportunity to hold a brown bear tag yearly.

Proposal 67: Support

This would allow great access for young hunters to get into bowhunting and seasoned bowhunters alike. This would greatly increase opportunity in an area with the shortest deer season.

Proposal 68: Support

This would allow great access for young hunters to get into bowhunting and seasoned bowhunters alike. This would greatly increase opportunity in an area with the shortest deer season. I don't think bowhunters would create conflict with other users of this area.

Proposal 69: Support

I would like families and our youth to have more "hooter" hunting opportunities, which extending the season into public school summer break would provide. I don't think the hooter population is at any real risk of being adversely affected because so much of the population is hard to reach and likely hardly hunted. Also, hooter harvests are mostly male.

**PC9**

Name: Johanna Bakker

Community of Residence: Auke Bay

Comment:**Proposal 48: Support**

Increase the number of Alexander Archipelago wolves to 200-300 wolves to maintain genetic diversity for this very isolated population of wolves.

Proposal 54: Support

I support this proposal.

Identification tags are a great way to increase compliance with the regulations on trapping and snaring. Just a tag with a number would be sufficient to identify the trapper to law enforcement.

**PC10**

Name: Ryan Baldwin

Community of Residence: Juneau

Comment:**Proposal 1: Oppose**

If you can see through the scope to make a clean shoot it should be legal to shoot. They should just band any artificial light.

Proposal 2: Oppose

Same reasoning i put under the big game.

Proposal 3: General_Comment

Doesnt refer to me personally hard to make a decision that doesnt refrain to me.

Proposal 4: Support

I agree with this change of definition

Proposal 5: Support

Brown bear have moved in an push alot of black bears out i believe with experience that there are alot of mainland brown bears and they are not hunted or manged as they should be. Swanson to st james has an abundance of bears as well as snetisham sweet heart creek..

Proposal 6: Support

Predator control is very important for the moose and deer on mainland and due to weather water wise makes it difficult to do so more days aloud the better.

Proposal 7: Support

Same as proposal 6

Proposal 8: Support

You should be able to shoot a cogar if you see one in alaska

Proposal 9: Support

If you catch one should be legal to keep.

Proposal 10: Support

Dont see what purpose sealing beaver has.

Proposal 11: Support

I think this should be allowed it has no affect on an animal going into a trap and it may help the trapper get to it faster to dispatch.

Proposal 12: Oppose

Alot of furbears are nocturnal

Proposal 13: Support

No night vision or artifical light should be alowed durring deer season

Proposal 14: Support

I feel like will get better data

Proposal 15: Support

I think there are so few if you do happen to catch them you should be able to keep them how ever many that is

Proposal 16: Oppose

Season is fine how it is

Proposal 17: Oppose

Bag limit is fine how it is

Proposal 18: Oppose

No need

Proposal 19: Support

Bears seem to be coming out later.

Proposal 20: Support

More open season the better

Proposal 21: Support

Agreed

Proposal 22: Support

Agree like previously stated

Proposal 23: Oppose

I think 6 deer is plenty.

Proposal 24: Oppose

There are plenty of deer i dont see why it would need to be put into the controled use area

Proposal 25: General_Comment

Not sure on this one

Proposal 26: Support I agree

Proposal 27: Oppose

Its substance animal hard to say what u can shoot to feed your family

Proposal 28: Oppose

Same as proposal 27

Proposal 29: Oppose

Substance animal cant ristRICT what people shoot for food

Proposal 30: Support

Support

Proposal 31: Support

Lots of bears every year should be good .

Proposal 32: Support

Agreed lots of bears not many brown bear hunter

Proposal 33: Support

Agreed

Proposal 34: Support

Help the black bear managment by allowing this in the juneau area.

Proposal 35: Support

Good change

Proposal 36: Oppose

No need to change

Proposal 37: General_Comment

Doesnt refine to me

Proposal 38: General_Comment

No comment

Proposal 39: General_Comment

No comment

Proposal 40: Support

Non residents shouldnt be able to shoot that many deer

Proposal 41: Support

Agree

Proposal 42: Oppose

Why would you

Proposal 43: General_Comment

No comment

Proposal 44: General_Comment

As little percentage as possible

Proposal 45: General_Comment

No comment

Proposal 46: General_Comment

No comment

Proposal 47: Support

Agree

Proposal 48: Support

Needs to be delt with to help the deer

Proposal 49: General_Comment

No comment

Proposal 50: General_Comment

No comment

Proposal 51: General_Comment

I think the season should be longer

Proposal 52: General_Comment

Not sure on the definition

Proposal 53: Oppose

Dont think its necessary

Proposal 54: Oppose

Not necessary just got changed not long ago to not having to have them tagged should be a choice

Proposal 55: Oppose

Shouldnt how will you be able to manage the heard

Proposal 56: Oppose

I dissagree

Proposal 57: Oppose

I dissagree

Proposal 58: Oppose

I dissagree

Proposal 64: Support

I agree



PC11

Name: Gwen Baluss

Community of Residence: Juneau

Comment:

Proposal 1: Support

Night hunting raises safety concerns.

Proposal 2: Support

Night hunting raises safety concerns.

Proposal 3: Oppose

Same day airborne take limits were instated for good management reasons. The fact that hunting mountain goats is such a challenge is the only reason that populations persist in areas that allow hunting. Also, flight-dependent hunting biases opportunities towards those who are wealthier.

Proposal 4: Support

Considering any animal hit with a projective to be "taken" is just common sense. A wounded animal likely will die, and from a management perspective is "taken" regardless if a hunter was able to salvage the animal or not, and absolutely should count towa

Proposal 5: Oppose

Proposal is not backed up with data that the bear population can sustain an increased harvest.

Proposal 6: General_Comment

I don't see the desire for opportunistic hunts to be a valid driver to change regulations.

Proposal 8: Oppose

It is premature to establish a season when the presence of a breeding population has not been validated.

Proposal 9: Oppose

It is premature to establish a season when the presence of a breeding population has not been validated.

Proposal 10: Oppose

Sealing is a tool for monitoring beaver populations and range, something that is important to track. Beavers alter local habitats and thus their presence or absence can inform managers about habitat for other species such as moose.

Proposal 11: Oppose

Devices that can improve trapping efficiency should not be adopted until there is better monitoring of fur-bearer populations.

Proposal 12: Support

This technology could increase the taking of fur-bearers in the absence of data that harvest is locally sustainable now.

Proposal 13: Support

This technology could increase the taking of fur-bearers in the absence of data that harvest is locally sustainable now.

Proposal 14: Oppose

Bag limits should be tied to population data.

Proposal 15: Oppose

Bag limits should be tied to population data.

Proposal 16: Oppose

Shifting waterfowl season further into winter could increase hunting pressure on to vulnerable populations. Sea ducks like White-winged Scoters have experienced populations declines and do not need more stresses to survive winter. For those residents who

Proposal 17: Support with Amendment

I agree that bag limits should be adjusted for Sooty Grouse, a species of conservation concern throughout its range, and Prince of Wales Spruce Grouse, a distinct subspecies unique to Southeast Alaska with a limited population size. Currently, liberal ba

Proposal 18: Support with Amendment

White the intent to protect hens with young in the late summer makes sense, shifting the season to overlap with the nesting season could be a step backwards for conservation. Thus, I would support the later start but not the later end date.

Proposal 26: Support I support any measures that would limit nanny harvest of mountain goats in our region. Mountain goat populations face many challenges in the face of a warming climate. In Southeast Alaska, ADF&G monitoring has been limited in recent years, and declines have been registered in

previous years. To sustain the population and potential for any hunting opportunities, management needs to be cautious and conservative. Limiting hunt of nannies could be an important tool. According to the Rocky Mountain Goat alliance, the population within a five-year horizon is impacted twice as much by taking a nanny vs. a billy.

Proposal 34: Oppose

I oppose this proposal for the reasons that ADF&G noted: concerns with trespass and wounded animals, as well as safety. Archery weapons may be safer than firearms, but they are still potentially dangerous to use near populated areas.

Proposal 35: Oppose

I oppose this proposal for the reasons that ADF&G noted: concerns with trespass and wounded animals, as well as safety. Archery weapons may be safer than firearms, but they are still potentially dangerous to use near populated areas.

Proposal 36: Support

I support delaying the start of ptarmigan season in Northern Southeast Alaska. I have observed that grouse and ptarmigan often have small young well into fall. This may be related to years of late spring and high snowpacks, or potentially hens starting

Proposal 54: Support

It surprises me that traps wouldn't be required to be identified everywhere.

Proposal 57: Support

It makes sense to allow more hunting to keep this introduced elk population in check.

Proposal 66: Oppose

More analysis on bear populations should be completed before changing regulations.

Proposal 69: Oppose

As ADF&G stated, the hunting season is long now. Extending further into spring would impact nesting season and potentially create a conservation issue. Both Sooty Grouse, a species of conservation concern throughout its range, and Prince of Wales Spruce Grouse, a distinct subspecies unique to Southeast Alaska with a limited population size occur in Unit 3.



Name: Zach Brown

Community of Residence: Gustavus

Comment:

Proposal 23: Oppose

Hello to the Board of Game, and thank you for your service to Alaska.

I was raised in the town of Gustavus, where I still live. I work at Tidelines Institute, an education and leadership nonprofit on the Inian Islands, within GMU 4.

Throughout August-November every year, I hunt on the Inian Islands and North Chichagof Island, both to provide for my family, and to give away to members of the Gustavus community who can no longer hunt, or who have limited access to the deer-populated islands.

As a fisherman, I have watched with horror as Icy Strait has become packed with charter boats throughout the summer. There is no question that they are depleting the salmon and halibut available to locals, and I fear a crash is rapidly approaching.

Sadly, this proposal for GMU 4 opens the same doors to charter organizations on land.

The idea that a non-resident should come up to a hunting lodge and shoot FOUR DEER is madness. It brings to mind the endless line of 50-pound fish boxes on the conveyor belt to fill the hold of every Alaska Airlines flight out of Gustavus. Soon there will be nothing left.

I don't have a problem with a charter fishing or hunting business per se, as long as it is done on a scale that the local environment can tolerate. Sport fishing has long since left behind tolerable limits, and this proposal would do the same for hunting. Not only does this spoil the resource and the experience for locals, but it murders the golden goose on which the charter lodges depend. What will they do when the fish and deer are gone? What will my family do?

Four deer for a visiting charter lodge guest is over the line—it is not even close to the line. The limit should be imposed at 1, or at most, 2 deer.



PC13

Name: Tel Brown

Community of Residence: Juneau

Comment:

Proposal 1: Oppose

Proposal 2: Oppose

Laws we have now cover this issue

Proposal 3: Oppose

Flying in and harvest should not be on the same day

Proposal 5: Support

Brown bear population supports this

Proposal 6: Support

Makes sense

Proposal 16: Support

I support this proposal, primarily to get rid of the split in our waterfowl season. I still see geese and ducks in my area throughout January. If this does not pass then I would hope that the season would open the 3rd week of September so we can no longer

Proposal 47: Oppose

Meat should be salvaged on these hunts.



PC14

Name: David Cannamore

Community of Residence: Gustavus

Comment:

Proposal 1: Support

Fair chase ethics

Proposal 2: Support

Fair chase ethics

Proposal 3: Oppose

Fair chase ethics

Proposal 11: Oppose

Fair chase ethics

Proposal 12: Support

Fair chase ethics

Proposal 13: Support

fair chase ethics

Proposal 23: Oppose

Non-resident deer hunting is already steadily increasing in the Icy Strait corridor, specifically in the vicinity of Elfin Cove. Non-resident fishing lodge owners are staying into the November rut and are bringing friends and family from down south to heavily hunt Port Althorp, Idaho Inlet, and other areas accessible by sport fishing boat.

Proposal 54: Support

Documentation and management are good things and maintaining a record of how many people are trapping and where.

Proposal 55: Support

Fair chase ethics

Proposal 56: Support

Fair chase ethics



PC15

Name: Matt Catterson

Community of Residence: Douglas

Comment:

Proposal 27: Oppose

I am a deer hunter and a resident of Douglas Island.

I oppose any regulatory changes that limit or complicate deer harvest opportunity on Douglas Island without clear evidence from ADF&G that the population is declining.

Douglas Island provides highly

Proposal 28: Oppose

I am a deer hunter and a resident of Douglas Island.

I oppose any regulatory changes that limit or complicate deer harvest opportunity on Douglas Island without clear evidence from ADF&G that the population is declining.

Douglas Island provides highly

Proposal 29: Oppose

I am a deer hunter and a resident of Douglas Island.

I oppose any regulatory changes that limit or complicate deer harvest opportunity on Douglas Island without clear evidence from ADF&G that the population is declining.

Douglas Island provides highly



PC16

Name: Travis Conatser

Community of Residence: Sitka

Comment:

Proposal 2: Oppose

Do not see the need for this change

Proposal 3: Oppose

Keep a level playing field for those of us who have to climb the mountain

Proposal 16: Oppose

Shifting the season will only benefit the sea duck hunters mostly guided out of state clients, I enjoy hunting teal and sandhill cranes at the start of our current season.

The sand hill cranes were gone after the second week of the season here in Sitka this proposal will end sand hill crane hunting for us



PC17

Name: Linda Conatser

Community of Residence: Sitka

Comment:

Proposal 16: Oppose

As a local sand hill crane hunter shifting the season dates will impact our crane hunts

The first couple weeks of the season is the only shot we have by the 1 of October the cranes have migrated on



PC18

Name: Cory Crossett

Community of Residence: Juneau

Comment:

Proposal 1: Support

If one can't see it clearly with natural light one should not be shooting at it.

Proposal 2: Support

If one can't see it clearly with natural light one should not be shooting at it.

Proposal 27: Oppose

Douglas island deer are not under population threat. A lot of people fill their freezers with Douglas deer. That might be at odds with the goals of macho trophy hunters, but it shouldn't be superseded by those desires. Personally, I've taken several bucks over the years in December after they'd shed their antlers. None of that meat would have been provided for my family if I had to be checking for antlers that weren't there. I oppose this regulation change. It's unnecessary and detrimental to many who hunt Douglas for food.

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Name: Richard Curran

Community of Residence: Sitka

Comment:

Proposal 23: Oppose

Many people in Southeast Alaska depend on Deer meat to feed the family. Encouraging a non resident sport hunt will make it more difficult to fill the freezer. 2 Bucks provides ample opportunity for non resident hunters.



PC19

**PC20**

Name: Victoria Curran

Community of Residence: Sitka

Comment:

Proposal 8: Oppose

There have been very few sighting of cougar in SE to date. The Department knows nothing about the population size or demographics. An open season for cougar is premature. Please vote no.

Proposal 9: Oppose

There have been very few sighting of Mountain Lion in SE to date. The Department knows nothing about the population size or demographics. An open season for Mountain lion is premature. Please vote no

Proposal 23: Oppose

Deer are an invaluable resource to local residents and subsistence hunters in Sitka. My family and my daughter's families rely almost exclusively on deer meat for our red meat. The Department suggests one reason to increase the non-resident bag limit is that there are healthy populations and lately mild winters. Obviously this winter has been a monster throughout southeast and it will result in deer die offs. Perhaps we are in for a series of hard winters. The other reason they give is that interest in nonresident hunting for deer is low. By increasing the bag limit you will increase the interest in hunting here. The proposal is not necessary for fish and game management. Changing a regulation for an invaluable resource for the benefit of "a small handful of nonresident hunters" is not appropriate. Nonresidents can already take home two nice bucks This is an invaluable subsistence resource for locals. Please do not vote for this proposal.

**PC21**

Name: Winston Davieas

Community of Residence: Wrangell

Comment:

Thank all of you for your time and dedication to our states game resources.

Proposal 1: Oppose

THis would be hard to enforce. Terrain and elevation would make this very confusing. Also, if troopers were given the tools needed to stop night hunting/spot lighting, this would not be an issue and those that are ethical hunters wouldn't be inconvenienced or lose out on the best time to hunt.

Proposal 2: Oppose

Deal with spot lighters

Proposal 3: Oppose

Spotting and landing to kill a goat is an unfair advantage. Not fair chase

Proposal 5: Support

There is no shortage of brown bear in unit 1. One bear every 4 years is a deterrent to harvesting bear, as I wouldn't want to shoot a smaller bear and then have to wait another 4 years to harvest another. Brown bear have spread to the islands, Wrangell and Etolin has a sizeable population and I have game cam pics of a brown bear on ZAREMBO

Proposal 6: Support

Extending the hunt would help ungulate populations and young of the year.

Proposal 7: Support

See comments for previous proposal

Proposal 8: Support

Cougar are an invasive species and prey on SE's most important big game animal - deer. Also, as an ambush predator, I don't want to have to worry about cougars when I'm out grouse hunting with my kids or when I'm bowhunting for deer.

Proposal 9: Support

See comments for previous proposal

Proposal 11: Support

I don't see how this would provide an unfair advantage to the trapper. It could allow the trapper to remove animals sooner so the animal suffers less, and could be a valuable learning tool for the trapper.

Proposal 12: Support

At least close it during big game season so there is no loophole

Proposal 13: Support

close the loophole for night hunting poachers

Proposal 14: Support

Invasive species that will have a negative impact on marten population. Also, if you inadvertently catch one while targeting other species, that animal is most likely dead and might be discarded if there is a limit.

Proposal 15: Support

see comments for 14

Proposal 16: Support with Amendment

This proposal will not work because the Crane hunters in SE won't get a chance at them. I'm not a huge bird hunter but always enjoyed getting out after deer season ended. Now with the way it is the first two weeks of december are closed when there are big tides and great time for waterfowl hunting. The last two years when it has opened for the last two weeks of December, it's been too cold to get out because the north wind had been brutal.

I could support a change in the season if it was amended to include the beginning of September, a closure for the first two weeks of November (during the deer rut) and then open all of December.

Proposal 18: Support

Most targeted grouse hunting is in April and the first two weeks of May when the males are hooting and you follow them to their roost tree and shoot them. Many years, the logging roads are covered with snow and limits access to the pursuit of these birds

Proposal 26: Oppose Anybody who's hunted goats much knows it's hard to tell sometimes and even when you think you have a Billy picked out, it might turn out to be a nanny. This seems like a harsh consequence.

Proposal 42: Support

There sure is a lot of competition in the alpine anymore. It'd be nice to see that time frame reserved for resident hunters

Proposal 54: Oppose

I'm opposed to any trap identification laws. It is just one more hurdle for a trapper

Proposal 57: Support with Amendment

I would like to see a hunt on Zarembo, but up the point count. The elk were not put there. Zarembo provides a lot of deer to the community of Wrangell, and the elk are definitely increasing their numbers and competing with deer.

Proposal 58: Oppose

Support prop 57

Proposal 63: Oppose

This proposal would guarantee the demise of the herd.

Proposal 64: Support

The intent of this law when proposed was to prevent unethical moose hunters from making a clearly illegal moose - legal by breaking or altering the antlers. It was not intended to be weaponized by troopers as a way to confiscate and write a \$1500 citation for a moose that is clearly a spike or fork and the antler was malformed in velvet.

Along these lines, I believe troopers can use discretion in these cases rather than taking an extreme take on the regulation, as evidenced by a body cam video that I hope Board Members have seen of a Trooper confiscating a fork moose in Wrangell.

It is already illegal to alter antlers, so prosecute if that's the case. But this proposal seeks to make legal to take a spike or fork with a natural break or an injury during velvet that has healed over.

Proposal 65: Oppose

This was discussed at length during several AC meeting and the consensus was that most of the local hunters were happy with the the current hunt, only that there is frustration with how the troopers determine legality and the consistency of the determinations. Hoping prop 64 helps to alleviate these issues.

Proposal 66: Support with Amendment

There seems to be more and more Brown bear on Wrangell and Etolin and even Zarembo. As a black bear who hunts over bait in the spring, I'm having more issue with brown bear destroying my barrel and

running off the black bear. With the regulation of 1 bear every 4 years, few bear are being harvested because if you take a bear, maybe a smaller bear than anticipated, you are done for 4 years.

I'm not sure if it fits here, but I definitely support this and would also like to amend this be able to harvest brown bear over bait. But that may need to be a separate proposal for the future....

Proposal 69: Oppose

I only oppose this because I support the earlier proposal extending the season to May 31. I concede that June 15 is too late to keep it open.



PC22

Name: Zach Decker

Community of Residence: Juneau

Comment:

Proposal 1: Oppose

I don't feel we have the need to confuse hunter with more regulation. This also leaves ambiguity for law enforcement.

Proposal 2: Oppose

I don't feel we have the need to confuse hunter with more regulation. This also leaves ambiguity for law enforcement.

Proposal 3: Support with Amendment

Amend to all big Game in GMU 1-5 South East. Hunters must wait four hours from being Air Borne to attempt to "TAKE" big game in GMU 1-5. See definition of TAKE.

Proposal 4: Support

This regulation should be for ALL big game in Alaska. If a hunter attempts to "TAKE" big Game in Alaska the hunt must discontinue if a hunter wounds a big game animal.

see definition of TAKE in the regulation book.

Proposal 5: Support with Amendment

Amend- One Bear every other other year.

Proposal 6: Support

I don't feel we have the need to confuse hunter with more regulation. This also leaves ambiguity for law enforcement.

Proposal 7: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 8: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 9: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 10: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 11: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 12: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 13: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 14: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 15: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 16: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 17: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 18: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 19: Oppose

Out side drainages already open and resident have the opportunity to hunt late.

Proposal 20: Support

This proposal opens 16nm of beach line for 11 days. This will allow for a small opportunity and not impact the overall harvest. This is a very small realignment in this area and makes the boundary line easy to identify.

This HAS ZERO impact on BEAR VIEWIN

Proposal 21: Support

Expanding the open area under Regulation RB088 to include Northeast Chichagof until May 31

Background on Regulation RB088

Regulation RB088 is a registration hunt for brown bears in Game Management Unit (GMU) 4, which includes Chichagof Island, administer

Proposal 22: Support

Unit 4 has been 40 BEARS below the harvest guide lines for more than 10 YEARS. This is an important opportunity for hunters in SE to allow Brown Bear hunter to start ONLY two weeks early like in UNIT 5. As the climate has continued to change we see more

Proposal 23: Oppose

We don't need the local fishing lodges exploiting the deer population like they have fish in Southeast. We don't need transporters to move in like Kodiak.

Proposal 24: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 25: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 26: Support with Amendment Make it illegal for all to take a Nanny in this area. Stop the division between residents and non residents.

Reporting needs to remain at 5 days. With state and federal holidays you can place hunters in violation unwillingly with a 3 day weekend.

Proposal 27: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 28: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 29: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 30: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 31: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 32: Support with Amendment

Amendment- one bear every other year.

Proposal 33: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 34: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 35: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 36: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 37: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 38: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 40: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 41: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 42: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 43: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 44: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 45: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 46: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 47: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 48: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 49: Support

I don't feel we have the need to confuse hunter with more regulation.

Proposal 50: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 51: Support

I support the idea of this proposal

Proposal 52: Support

I support the idea of this proposal

Proposal 53: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 54: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 55: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 56: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 57: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 58: Support

I support the idea of this proposal

Proposal 59: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 60: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 61: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 62: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 63: Support

I support the idea of this proposal

Proposal 64: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 65: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 66: Support

give a opportunity to hunters

Proposal 67: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 68: Oppose

I don't feel we have the need to confuse hunter with more regulation.

Proposal 69: Support

open opportunity

Proposal 272: Support

I don't feel we have the need to confuse hunter with more regulation.



Name: Bjorn Dihle

Community of Residence: Juneau

Comment:

Proposal 3: Oppose

Goat populations have suffered in several areas. There are enough alpine lakes that allowing same day hunting could further hurt numbers.

Proposal 4: Support

Goat populations are not abundant,

Proposal 5: Oppose

Brown bears should be managed for trophy value not increased take.

Proposal 6: Oppose

Pelt quality and potential disruption to denning.

Proposal 7: Oppose

Pelt quality and potential disruption to denning.

Proposal 8: General _Comment

I would support this if it made sense. Not sure if it does.

Proposal 9: Support

I would support this if it made sense. Not sure if it does.

Proposal 10: Support

I think this requirement is outdated since beaver pelts are no longer in demand. Removing this will make it easier on trappers and wildlife managers.

Proposal 11: Support

I support this in theory at least. It seems like a good way to minimize time of live animals in traps.

Proposal 12: Support

Getting too weird.

Proposal 13: Support

Getting too weird.

Proposal 14: Support with Amendment

Not sure how viable the population is but since they overlap with marten there should be some way for marten trappers to have some grace for incidental catch of fishers.

Proposal 15: Oppose

Maybe down the road.

Proposal 16: Oppose

Unless there is a biological reason, I don't see why this is worth changing.

Proposal 17: General_Comment

I wouldn't mind seeing the bag limit in places like the Juneau Douglas road system lower to two or three to allow young hunters better opportunities, but I oppose lowering take in other places.

Proposal 18: Oppose

Hens are nesting by mid-May most of the time.

Proposal 19: Oppose

Higher probability of taking sows and lower pelt quality.

Proposal 22: Oppose

It will cause more friction with other outdoor users, particularly small ship tourism and bear viewing groups and there does not to be anymore friction there than already is.

Proposal 23: Oppose

I strongly oppose this proposal. Deer are incredibly important to residents and this could lead to less opportunities for locals to fill their freezers and a lot of conflict. There is already conflict with federal subsistence and this would greatly add fuel to that fire that down the road could come back and hurt a lot of resident deer hunters. Two deer is plenty for nonresidents. We don't want to encourage a boom in transporters and nonresident meat hunting.

Proposal 26: Support with Amendment I don't think nonresidents should have to forfeit a nanny, but maybe a small fine.

Proposal 27: Oppose

Unless there is a population issue, which there seems not to be, this would cut down on and potentially discourage young hunters from having success. I think the one doe limit there is sufficient.

Proposal 28: Oppose

Unless there is a population issue, which there seems not to be, this would hurt a segment of hunters from filling their freezers.

Proposal 29: Oppose

This is just silly.

Proposal 31: Oppose

I think we need to manage brown bears as a trophy resource and this would not be helpful.

Proposal 32: Oppose

I think we need to manage brown bears as a trophy resource and this would not be helpful.

Proposal 33: Oppose

I think we need to manage brown bears as a trophy resource and this would not be helpful.

Proposal 34: Oppose

I could see this leading to mayhem on the roads.

Proposal 35: Oppose

I could see this leading to mayhem on the roads.

Proposal 36: Oppose

I could go either way on this, since chicks are sometimes still pretty small Aug 1st. However, I don't think we need to be limiting hunting opportunities especially for younger hunters.

Proposal 40: Support

We need to support resident hunters.

Proposal 41: Support

We need to support resident hunters.

Proposal 42: Support

We need to support resident hunters.

Proposal 47: Oppose

I've ate a lot of spring black bear and 90% is good meat. Strongly oppose wanton waste of good meat.

Proposal 52: Oppose

We do not need the attention this would draw.

Proposal 54: Support

I think this is pretty basic. A little annoying, but basic.

Proposal 55: Support

This is too weird.

Proposal 56: Support

This is too weird.

Proposal 66: Oppose

Should manage them as a trophy resource.

Proposal 69: Oppose

Hens nesting and chicks being born.

Name: Kiah Dihle

Community of Residence: Juneau

Comment:

Proposal 23: Oppose

This could cause an unnecessary increase in competition and pressure on locals from nonresidents.



PC24



Name: Bradley Golden

Community of Residence: Anchorage

Comment:

Proposal 1: Oppose

This is not a specific region or specific GMU topic. Their support for the proposal highlights hypothetical illegal activities and this would only penalize those who follow the law. This would also be extremely difficult to enforce.

Proposal 2: Oppose

This is not a specific region or specific GMU topic. Their support for the proposal highlights hypothetical illegal activities and this would only penalize those who follow the law. This would also be extremely difficult to enforce.

Proposal 3: Oppose

Weather controls access for hunting everywhere, not just SE Alaska. Allowing the taking of goats the same day airborne would set a precedent for other regions and GMUs. This would increase pressure and ultimately lead to a reduction in opportunity.

Proposal 4: Support

This should be applied to all big game species statewide.

Proposal 8: Support

This is important predator management.

Proposal 9: Support

This is important predator management.

Proposal 11: Oppose

We do not need more technology in trapping.

Proposal 12: Oppose

This is not a region or GMU specific matter.

Proposal 13: Oppose

This is not a region or GMU specific matter.

Proposal 24: General_Comment

The controlled use area specifies exclusions for brown bear hunting, not deer hunting.

Proposal 26: Support More needs to be done to discourage the taking of nannies.

Proposal 38: Oppose

Why would the reduction affect residents only? Residents and nonresidents currently have the same bag limit. If there are population issues, the reduction should apply to nonresidents too.

Proposal 40: Support

There are two local advisory committees with multiple proposals to reduce the bag limit for deer in this unit. An effort should be made to reduce nonresident bag limits first if the harvest data supports the action.

Proposal 41: Support

There are two local advisory committees with multiple proposals to reduce the bag limit for deer in this unit. An effort should be made to reduce nonresident bag limits first if the harvest data supports the action.

Proposal 43: Support

The departments explanation makes sense and if the harvest data supports the change, it makes sense to create more opportunity.

Proposal 44: Support

It would be nice to know the allocation of resident/nonresident applications on all of the draw hunts. Allocating the draw hunts to give residents more permits makes sense.

Proposal 45: Support

It would be nice to know the allocation of resident/nonresident applications on all of the draw hunts. Allocating the draw hunts to give residents more permits makes sense.

Proposal 46: Support

It would be nice to know the allocation of resident/nonresident applications on all of the draw hunts. Allocating the draw hunts to give residents more permits makes sense.

Proposal 54: Oppose

This is burdensome on law abiding trappers and does nothing to prohibit illegal trapping.

Proposal 59: Support

Allocating the draw hunts to give residents more permits makes sense.

Proposal 60: Support

Allocating the draw hunts to give residents more permits makes sense.

Proposal 61: Support

Allocating the draw hunts to give residents more permits makes sense.

Proposal 62: Support

Allocating the draw hunts to give residents more permits makes sense.



PC26

Name: Dave Gordon

Community of Residence: Sitka

Comment:

Proposal 16: Oppose

Dave Gordon Resident of Sitka. Comments on Proposal 16:

I am strongly opposed to this proposal. September is an important month for waterfowl in SE AK as early migrations of waterfowl come through the region at that time. Season changes will always benefit one group and hurt another's opportunity. Always a compromise. The BOG has dealt with several season changes over the last 10 or so years and I believe the current seasons has made an optimal compromise that provides for early season opportunities as well as providing opportunity during the Christmas break. Thank you for the opportunity to comment.



PC27

Name: Tyler Green

Community of Residence: Sitka

Comment:

Proposal 1: Support

Why would night hunting be supported? Makes zero sense

Proposal 2: Support

Hunt during the day. I don't get it

Proposal 3: Oppose

It's only fair to the animal

Proposal 4: Support

Preserve the goats from being target practice.

Proposal 5: Support

The bear population. Is high. Needs to be thinned out

Proposal 6: Support

Wolfs kill every game animal that Alaskans rely on for subsistence.

Proposal 7: Support

They decimate deer, elk and moose populations

Proposal 8: Support

Be the hunter m, not the hunted

Proposal 9: Support

They are not desirable for table fare.

Proposal 10: Support

It's just a beaver

Proposal 11: Support

Why not

Proposal 12: Support with Amendment

Thin the heard

Proposal 13: Support

No night vision

Proposal 14: Support

Plenty around to allow increased bag limits

Proposal 15: Support

Just do it

Proposal 16: General_Comment

Doesn't apply to me

Proposal 17: General_Comment

Doesn't apply to me

Proposal 18: General_Comment

Doesn't apply to me

Proposal 19: Support

Bear population is exploding

Proposal 20: Support

Simplify

Proposal 21: Support

Simplify

Proposal 22: Support

Thin the heard

Proposal 23: Oppose

Big NO.

Proposal 24: General_Comment

Doesn't apply

Proposal 25: Oppose

Some locals don't have boats. Leave it open

Proposal 26: General_Comment Doesn't apply

Proposal 27: Support

Bucks are fine

Proposal 28: Support

Bucks are fine

Proposal 29: Oppose

Bucks are fine

Proposal 30: Support

Yes

Proposal 31: Support

Thin the heard

Proposal 32: General_Comment

Doesn't apply

Proposal 33: General_Comment

Doesn't apply

Proposal 34: General_Comment

Doesn't apply

Proposal 35: Support

Why not

Proposal 36: General_Comment

Doesn't apply

Proposal 37: General_Comment

Doesn't apply

Proposal 38: Oppose

No, we're not raising bag limits for non-residents in any area and reducing lints for residents. Absolutely not

Proposal 39: Oppose

It's a buck

Proposal 40: Support

Keep the non-resident horn hunters out of here

Proposal 41: Support

Residents first

Proposal 42: Oppose

They can start September 15

Proposal 43: General_Comment

Doesn't apply

Proposal 44: Support

No more than 20%

Proposal 45: Support

No more than 20%

Proposal 46: Support

No more than 20%

Proposal 47: Support

Thin the heard

Proposal 48: General_Comment

If the objective is to reduce the number of wolves then yes

Proposal 49: Support

Dec 15

Proposal 50: Support

Yes

Proposal 51: Support

Make it 90 days

Proposal 52: Support

They need to go

Proposal 53: Oppose

No

Proposal 54: Support

Accountability

Proposal 55: Support

No

Proposal 56: Support

No

Proposal 57: General_Comment

Doesn't apply

Proposal 58: Support

Why not

Proposal 59: Oppose

No

Proposal 60: Oppose

No

Proposal 61: Oppose

No

Proposal 62: Oppose

No

Proposal 63: Support

For residents only

Proposal 64: Support

What they are is what they are

Proposal 65: Support

If populations support this then yes

Proposal 66: Support

Too many bears

Proposal 67: Support

Yes

Proposal 68: General_Comment

Doesn't apply

Proposal 69: Support

Why not



PC28

Name: Cathy Gross

Community of Residence: Wrangell

Comment:

Proposal 65: Oppose

The current antler restrictions in place, in my opinion, ensures long term sustainability of the moose herd on the Stikine River. I respectfully request the board vote no on this proposal.



PC29

Name: Jared Gross

Community of Residence: Wrangell

Comment:

Proposal 65: Oppose

Look at the data when there was an any bull hunt.



COMMENTS FROM:
ED GROSSMAN *Ed Grossman*
TUNEAU, ALASKA

DEC 2025

PROPOSAL #3 OPPOSE. THIS IS NOT ABOUT SAFETY OR ACCESSIBILITY, ITS ABOUT PEGGING ANIMALS FROM THE AIR, LANDING, & SHOOTING THEM, THIS WILL LEAD TO THE SAME PROBLEMS FOUND IN THE INTERIOR REGARDING SHEEP.

PROPOSAL #23 OPPOSE. IN RECENT YEARS, LARGE YACHT BASED, GUIDED HUNTING OPERATIONS HAVE MOVED IN TO SEYMOUR CANAL WHERE THEY OFFER NON-RESIDENTS WEEKS OF DEER HUNTING. THIS HAS BEEN VERY DISRUPTIVE TO LOCALS WHO FREQUENT THE CANAL AND BAYS EACH FALL. MOST NON-RESIDENTS DO NOT WANT THE MEAT, I'M SURE THE MEAT IS DISTRIBUTED ETHICALLY, BUT THE POINT IS THIS IS A TROPHY HUNT FOR NON-RESIDENTS. THAT TOO IS FINE, BUT 2 BUCKS IS ENOUGH. IT'S NOT JUST ABOUT HEALTH OF THE HERD, BUT QUALITY OF EXPERIENCE FOR ALL.

PROPOSAL #28 SUPPORT. GIVEN THE POPULARITY AND ACCESSIBILITY OF DOUGLAS ISLAND, DOE HARVEST SHOULD BE CURTAILED, AND BUCK HARVEST REDUCED. THIS WILL LEAD TO MORE & BETTER OPPORTUNITY IN A FEW YEARS.



Name: Richard Halvorsen

Community of Residence: Juneau

Comment:

Proposal 12: Support

Unnecessary advantage given with use of night vision.

Proposal 17: Support

Preserving hens during the breeding season will bolster grouse populations. One hen can produce many grouse each season. Population will strengthen especially if the season were to be adjusted per Proposal 18.

Proposal 18: Support

Opportunities are limited in spring so extending the season to May 31st offers more opportunity for hunters. Also delaying season opening until August 10th allows more opportunity for chicks to grow / disperse before hens may be killed. This proposition would work well with Proposition 17.

Proposal 27: Support

Preserving does on Douglas will increase the herd size. If ADFG truly views the Douglas population as an accessible resource for road bound and youth hunters who don't have access to other areas then this proposition is the sensible thing to do. Each year a doe is statistically likely to add another deer to the landscape. If you remove a doe from the landscape you remove all the deer she would have added to the population over the rest of her life. Then there all the deer her offspring may have added to the landscape. Works like compound interest on this prime Sitka blacktail habitat. Maximize the population by not harvesting does, bucks only. One buck can breed many does. More deer on Douglas will mean fewer days to harvest for a hunter and more harvests.

Proposal 28: Oppose

Too restrictive. Though most hunters aren't even able to find two bucks on Douglas in a given year anyways.

Proposal 29: Oppose

Too restrictive. A kid should be able to shoot a spike, though seasoned hunters ought to be able to find more mature animals to harvest anyways.

Proposal 34: Oppose

Arrows are still dangerous near roads and habitation.

Proposal 35: Oppose

Arrows are still dangerous near roads and habitation.

Proposal 54: Support

Traps and snares should always have identification. Makes trapping out of season enforceable.

Proposal 55: Support

Night vision is an unnecessary advantage.

Proposal 56: Support

Night vision is an unnecessary advantage.



PC32

Name: Rafe Hanson

Community of Residence: SITKA

Comment:

Proposal 16: Support

There doesn't seem to be much bird activity in September. However there plenty of birds well into January from my observations.

Proposal 23: Oppose

I believe that the current limit of 2 is adequate. 4 would bring too much pressure to the area. As it's already becoming more popular.



PC33

Name: Mike Harris

Community of Residence: Soldotna

Comment:

Proposal 1: Oppose

The regulations clearly state that big game cannot be taken with the use of artificial light.

Proposal 2: Oppose

The regulations clearly state that big game cannot be taken with the use of artificial light.

Proposal 3: Oppose

This would open the door for abuse by scouting goats from the air and aiding the hunter in taking a goat the same day. Same day airborne is not fair chase.

Proposal 4: Support

A wounded animal often times will expire as a result of their wounds. It makes sense with carefully managed species such as goats to mirror that which already applies to bears in the region.

Proposal 11: Oppose

Fair chase is continually being threatened by those that would replace technology with effort. Adopting this proposal would open more doors for such abuse.

Proposal 12: Support

Technology such as night vision gives an unfair advantage to hunters and goes against the principles of fair chase.

Proposal 13: Support

Technology such as night vision gives an unfair advantage to hunters and goes against the principles of fair chase.

Proposal 23: Support with Amendment

While I support nonresidents having a bag limit of more than one deer when appropriate, there is no reason that any nonresident ever needs to take 4 deer in the state of Alaska.

Amending the proposal to two deer would be more agreeable as it would allow nonresidents ample hunting opportunity, as well as the chance to take a doe. Some hunters (including nonresidents) would jump at the opportunity to take a doe in such instances as new hunters looking for success, bowhunters, hunters at the end of a hunt for a buck and still wanting to return home with some meat etc.

Proposal 27: Oppose

Some hunters enjoy the opportunity to pursue deer of either sex. Youth, new hunters, bowhunters etc. benefit from either sex hunting opportunities. A more agreeable option would be to leave the bag limit "any deer" but reduce it from 4 deer to 2.

Proposal 28: Support with Amendment

Rather than two bucks, make the bag limit two deer.

Proposal 36: Support

I am an avid ptarmigan hunter and volunteer for ADFG conducting ptarmigan brood surveys in Southcentral Alaska.

Even by August 10th, ptarmigan chicks are quite small and only fly short distances. Allowing 2 extra weeks before opening the season would greatly benefit the birds and the quality of the hunt.

Proposal 37: Support

I am generally of the opinion that anything over 2-3 deer per person is unnecessary for sport hunters.

Proposal 38: Support

I am generally of the opinion that anything over 2-3 deer per person is unnecessary for sport hunters.

Proposal 40: Support with Amendment

I agree with the reduced bag limit but believe that nonresidents should be allowed two bucks.

I have several nonresident friends who enjoy hunting Sitka Blacktail and purchase two tags. If they take a deer on day one or two of the hunt, they will continue to hunt selectively for a bigger buck. Most of the time they end up only killing one deer but the department still makes money on selling the additional tags.

Proposal 41: Support with Amendment

I agree with the reduced bag limit but believe that nonresidents should be allowed two bucks.

I have several nonresident friends who enjoy hunting Sitka Blacktail and purchase two tags. If they take a deer on day one or two of the hunt, they will continue to hunt selectively for a bigger buck. Most of the time they end up only killing one deer but the department still makes money on selling the additional tags.

Proposal 55: Support

Technology such as night vision gives an unfair advantage to hunters and goes against the principles of fair chase.

Proposal 56: Support

Technology such as night vision gives an unfair advantage to hunters and goes against the principles of fair chase.

Proposal 63: Oppose

If adopted, hunting opportunity would be lost by permits being limited due to increased harvest. Adopting this proposal would cause increased harvest by two significant factors. creating a new hunt allowing firearms AND allowing that hunt to take place during the rut when elk are more susceptible.



PC34

Name: Hrant Harutyunyan

Community of Residence: Juneau

Comment:

Proposal 1: Support

safety and responsible hunter(possibility of injuring the animal in the dark and not finding it)

Proposal 2: Support

safety and responsible hunter(possibility of injuring the animal in the dark and not finding it)

Proposal 3: Oppose

Not fare for people who cannot hire a plane/helicopter.

Proposal 8: Oppose

Population is to low for hunting.

Proposal 9: Oppose

Population is to low for hunting.

Proposal 17: Support

Will increase the grouse population. Have them come down the mountain a bit.

Proposal 18: Support

Extending to the end of May will help young hunters to get into the grouse hunting.

Proposal 23: Oppose

two buck is enough for non residents. Non residents do a trophy hunt usually anyway.

Proposal 26: Support anything to support growth in population of goats in our region is good.

Proposal 27: Oppose

Douglas island is the only hunt area accessible by road where you can hunt any deer(1 doe limit). Keep it that way. Restrict hunt to only residents if there is need for more conservation.

Proposal 28: Oppose

Douglas island is the only hunt area accessible by road where you can hunt any deer(1 doe limit). Keep it that way. Restrict hunt to only residents if there is need for more conservation.

Proposal 29: Oppose

Bad idea will be hard to manage. Douglas island is the only hunt area accessible by road where you can hunt any deer(1 doe limit). Keep it that way. Restrict hunt to only residents if there is need for more conservation.

Proposal 30: Support

Good idea for disabled hunters support.



PC35

Name: Mark Holst

Community of Residence: Sitka

Comment:

Proposal 1: Oppose

I Strongly Oppose proposals 1 and 2

Proposals 1 and 2 is the wrong solution to this problem. When I hunt, I always hit the woods well before light, especially when I'm in the alpine or walking on beaches and logging roads. Often taking deer very early in

Proposal 2: Oppose

See comment on proposal 1.

Proposal 25: Support

I support proposal 25

I am a life long resident of Sitka, I have never really known the extent of the "Sitka road system." This is a necessary clarification, especially with the opening of the new Katlian road. Thank you ADF&G



PC36

Name: John Horst

Community of Residence: Gustavus

Comment:

Proposal 1: Support

I support this proposal-- I have heard anecdotes of hunters jacklighting deer but shutting the lights off just prior to shooting. I'd like to see that practice made incontrovertibly illegal.

Proposal 2: Support

Similar to the above-- I support this because it prevents hunters from jacklighting and then shutting off the lights prior to shooting.

Proposal 4: Support

I think this supports ethical hunting practice, and will encourage hunters to take good shots, and to factor a mountain goat's recoverability into their shot calculus, as well.

Proposal 23: Oppose

While I understand there to be signs that the deer population in unit 4 is thriving, I am opposed to increasing the nonresident bag limit for deer in this unit. As a resident hunter in Gustavus, I know how important the local deer harvest is for food secu

Name: Brad Hunter

Community of Residence: Petersburg

Comment:

Proposal 66: General_Comment

The decision for this significant change in bag limit should be weighted heavily by what is recommended by the wildlife biologists based upon bear populations health.

Proposal 67: Oppose

This small area is a minor portion of the the island and if opened to archery hunting it would not significantly increase hunting opportunities, but it would impact other public uses. It is heavily trafficked by the general public and is a popular area.

Proposal 68: Oppose

This area is the most highly developed area on the island for Developed Recreation. It includes the Blind River Rapids Trail and picnic shelters, three Special Use recreation cabins, the Swan Observatory, and the Blind Slough Picnic Area. In addition to

Proposal 69: Oppose

The extension of the hunting season into the nesting and chick raising season should be based upon biological reasons, not convenience. Also, many people have difficulty telling the difference between a hen and male. Seems like it should be simple but..



PC37

Name: Gary Hutchison
Community of Residence: Fairbanks
Comment:



PC38

Proposal 272: Support

Comments from Garry Hutchison - Fairbanks

I support the changes to beaver regulations as outlined in Proposal 272. I've trapped beaver in unit 20B for over 30 years, and have recently watched the number of houses and size of food caches decrease dramatically. I have seen hunters looking to shoot beaver and witnessed wide-spread evidence of beaver being trapped with above water sets during the open water seasons. My trapping partner was called to help release someone's pet dog from a conibear set on a beaver house, during the spring of 2024.

With bear hunters and dog owners looking to use beaver carcasses for bait and dog food, pressure on beaver populations has increased dramatically during the open water season when the animals are the most vulnerable, and easiest to kill. Hopefully, the regulations proposed by the ADF&G will help reduce harvest, and pressure on beaver populations.

The Salcha, Chena and Chatanika rivers are located in 20B, and Fairbanks is a large urban area. Reasonable regulations are necessary to keep from killing off the beaver.

Name: Jake Jabusch
Community of Residence: Petersburg
Comment:



PC39

Proposal 1: Oppose

Proposal 2: Oppose

Proposal 3: Oppose

Proposal 5: Support

Proposal 6: Support

Proposal 7: Support

Proposal 8: Support with Amendment

I don't support the proposal as written but I do feel like it should be added into the mule deer and whitetail deer or the unclassified game section in the regulation book.

Proposal 16: Oppose

Proposal 17: Oppose

Proposal 18: Support with Amendment

I personally would go with proposal 69 because it would allow more opportunity for the youth after the school year

Proposal 19: Support

Proposal 44: Oppose

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Proposal 45: Oppose

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Proposal 46: Oppose

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Proposal 57: Oppose

This would be unsustainable and chaotic.

Proposal 58: Oppose

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Proposal 64: Oppose

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Proposal 65: Oppose

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Proposal 66: Support

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Proposal 67: Support

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Proposal 68: Support

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Proposal 69: Support

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PC40

Name: Conner Johns

Community of Residence: Juneau

Comment:

Proposal 19: Oppose

This does not align with the Brown Bear Management Plan currently in use for the region.

Proposal 20: Oppose

This does not align with the Brown Bear Management Plan currently in use for the region

Proposal 21: Oppose

This does not align with the Brown Bear Management Plan currently in use for the region.

Proposal 22: Oppose

This does not align with the Brown Bear Management Plan currently in use for the region.

Proposal 23: Oppose

Yet to see the impacts of extreme snow events in December of 2025 on the deer population to warrant increasing nonresident bag limits. This adds little value (if any) to the majority of Resident hunters while a select few benefit. As seen on Kodiak (unit 8) increase of nonresident bag limit for deer is a issue of economic origin not biological.

Proposal 31: Oppose

This does not align with the Brown Bear Management Plan currently in use for the region

Proposal 32: Oppose

This does not align with the Brown Bear Management Plan currently in use for the region

Proposal 33: Oppose

This does not align with the Brown Bear Management Plan currently in use for the region

Proposal 56: Support

Creates a gray area for law enforcement if a hunter is in possession of NV or IR during the overlap of a furbearer and deer season.

Name: Stan Johnson

Community of Residence: Sitka

Comment:

Proposal 16: Oppose

The September seasonal start to the migratory bird hunting season has been well established for decades with minor changes in recent years. The proposed change would have a detrimental effect on resident opportunities to harvest Teal and Sandhill cranes at a minimum. I would also like to add my personal observation that this proposed rule change was crafted to benefit guides rather than residents of Southeast Alaska.

Proposal 23: Oppose

This rule change request will in no way benefit resident hunters of Alaska.

Proposal 24: General_Comment

Does this proposed rule change directly benefit or negatively impact the year-round residents of Tenakee? If the impact is negative then the proposal should not move forward.



PC41



PC42

Name: Josh Johnson

Community of Residence: Sitka

Comment:

Proposal 16: Oppose

The season dates starting September 1 for migratory birds in unit 4 are great the way they are. By October 8 the birds have already migrated through. We get teal, widgeon, pintail, white front , lessers etc. . All of which are good eating compared to a local mallard or sea duck in my opinion. My kids all love this early season. We don't have much in the way of small game around Sitka. The earlier September season is a great chance to be outdoors.



PC43

Name: David Johnson

Community of Residence: Sitka

Comment:

Proposal 1: Support

The use of illumination after shooting light to locate deer and then shoot after light is switched off is dangerous and unethical

Proposal 2: Support

The use of illumination after shooting light to locate deer and then shoot after light is switched off is dangerous and unethical

Proposal 3: Oppose

I do not support the use of a plane to locate game to be taken during the same day of flying into an area.

Proposal 17: Oppose

The population around Sitka is small and an increase in the bag limit could jeopardize the population

Proposal 18: Support

Because of the small population the ability to locate birds is difficult. This would allow hunters to locate birds while out in the woods in search of other game.

Proposal 23: Oppose

All though the population is estimated to be high the last couple of years, one bad winter can reduce the population. As a subsistence hunter the last 25 years, my family depend on venison. I don't support an increase pressure on the deer population.

Proposal 25: Support

All f&g regulations should be written in a clear manner so that they can be easily understood



PC44

Name: Jake King

Community of Residence: Fairbanks

Comment:

Proposal 19: Support

Predator control is necessary and resident hunting opportunities should be extended

Proposal 66: Support

Predator management is necessary for the health of the other wildlife populations.

Proposal 67: Support

Opening an area and expanding archery opportunities is a win-win

Proposal 68: Support

Opening an area and expanding archery opportunities is a win-win

Proposal 69: Support

Expanding grouse season will allow more time to get people out and utilize the area more fully



**Comments to the Alaska Board of Game Southeast Region Meeting
January 23 - 26, 2026
Proposals #67 and #68
by Rebecca Knight
Petersburg, Alaska. 99833**

Following are my near verbatim comments read before the Petersburg Advisory Board on Jan. 8, 2026 for Proposals #67 and #68. I have combined both proposals in my comments as they are both intertwined.

These two proposals would eliminate the Petersburg Road System (#67) and Blind Slough "Closed to Hunting" Areas (#68) and incorporate both into the Petersburg Management Area (PMA). They would allow bow hunting access to big game in these areas under the same regulations that apply elsewhere in the PMA.

For the record, I support hunting, just not in these two areas.

The old adage of, "If it is not broken don't fix it" applies here. The CURRENT regulations are not broken (#67 & #68):

I oppose both proposals for a variety of very sensible reasons:

- I regularly use the world class Blind Slough Closed Area (#68) and Petersburg Road System Closed Area (#67) for bird watching, hiking, and family recreation and find great solace in knowing that there will be NO hunter conflicts with my and my family's use of the area;
- Both of the areas in question are easily accessible and well-used by families and individuals, sport fishers, birders, berry pickers, kayakers, and hikers to name but a few uses (#68);
- Access to Blind Slough is through the current Petersburg Road System Closed Area (#67). Berry pickers and others use both sides of the highway (#67);
- The 1/4 mile "Petersburg Road System Closure" extends from 8.75 mile (~Tree Nursery/Fur Farm) to 17.22 mile (Blind Slough Picnic Area and Hatchery Rd.) was wisely enacted in 1962 (64 years ago). Until these two recent proposals (#67 & #68), there has been no known discontent regarding the hunting status of the two areas;
- There are numerous private residences in the current road system closed area which have been developed since enactment of the road closure. This makes safety even more important since the road system closure 64 years ago (#67);



- In fact, the proposed Blind Slough and the Petersburg Road System closed area were not added to the Petersburg Management Area when it was created in 2002. There was no hue and cry then to add these areas to the PMA (#67 & #68);
- If both measures are approved, the current 1/4 mile road setback would be lost, and replaced with a much narrower 100 yard setback and open to hunting (#67 & #68);
- According to ADFG the Southeast Alaska communities of Wrangell, Sitka, and Juneau have similar road system closed areas. If enacted (#67), Petersburg would be an exception in Southeast Alaska.
- In regard to Proposal 67, the current 1/4 mile road setback is easy to gauge in the Blind Slough area. Any local user can be assured that while in the currently closed area, that there will be no hunter conflicts. Currently, from the road to at least the Blind Slough shoreline and beyond, is closed to hunting. It is a no-brainer. Modification to a minimal 100 yard/300 foot setback from roads and infrastructure would create confusion. It would mean that there would be a strip between the road and water open to hunting (if proposal 68 is NOT enacted), making it difficult to gauge and thus a safety hazard to users of the area who wish to not venture into an area open to hunting. Who will enforce this minimal setback? The current assurance that there will be no conflicts with hunters in this area will be lost (#67);
- What about wounded animals? For instance, there are Brown Bear and Moose in the area and given their larger size, they could well survive a misplaced, bow inflicted injury and travel great distances. I understand bigger equipment is used to take such big game, but the potential still exists and in an area frequented by the public (#67 & #68);
- What about disturbance to sensitive swans which regularly reside in the area during hunting season? As of this writing, there are both Tundra and Trumpeter Swans overwintering in Blind Slough and can be seen throughout the Blind Slough Closed to Hunting area during the hunting season-not just at the viewing shelter. They are VERY sensitive to human intrusion (#67 & #68);
- The Blind Slough Area in question is a postage stamp size area currently closed to hunting and which offers a refuge to a variety of game, waterfowl...and humans. The remaining huntable area on Mitkof Island is vast.
- Moreover, our recent deep snow winter will likely prove to put a big dent in local deer abundance. Seems to me that it would be wise to retain an area outside of core Petersburg city limits that offers a refuge for struggling deer and other game populations—now and into the future. Lest we forget, our area suffered a 17-year closure for hunting due to low deer abundance (#67 & #68);



- There already exist more than 200 miles of road on Mitkof Island, the majority of which accesses areas open to hunting (#67). Is it really a hardship keep one small area off-limits to big game hunting as has been the case for 64 years?;
- If the possibility of bagging trophy size big game, that has not been hunted in years is the motivation, please consider the genetic diversity that such game offers to the overall population (#67 & 68);
- Finally, no data has been provided to verify that there are indeed “higher than normal deer populations” in the closed areas versus the rest of Mitkof Island (#67 & 68).

For the above rationale, I urge the Board of Game to reject Proposals 67 and 68.

Thank you,

Rebecca Knight

Rebecca Knight
Petersburg



Name: Grant Kopplin

Community of Residence: Palmer Alaska

Comment:

Proposal 23: Oppose

I oppose this proposal to raise the nonresident deer limit to 4. Two bucks is already a generous bag limit for non residents. In the proposal it says basically the reduction was made in good faith to show the federal Subsistence board an effort to address the concerns of rural users and deter the subsistence board from implementing federal restrictions. Well the federal subsistence board isn't going any where any time soon and I think maintaining that good faith effort. My main reason of opposing this proposal is that increasing the deer limit back up to four will unfortunately just draw a lot more attention and non resident pressure to the area. Yes there is a lot of deer and area in unit 4 but this increase in pressure will stack on top of other people that already hunt in unit 4 regularly. A lot of unit 4 can't and won't be accessed so it will cause this increase in pressure to stack into areas already being hunted. There is only so many rental cabins or so many lakes to fly into, and there is already substantial pressure in a lot of these areas and having more non residents competing for the same rental cabin or spots to fly into early season is going to degrade the hunt quality. These nonresidents aren't going to control the population, they are only going to shoot bucks, so why raise the deer limit for non res and draw a bunch of extra attention and make things harder for the people who already hunt there. Several Of the lakes I wanted to fly into early season this last year were already booked by nonresident hunters and the air taxis all said in 2025 they had more non residents than ever before. We don't need more attention and pressure in unit 4. Thank you!

Please do not raise the deer limit. ADFG has been advertising the ABC islands for hunting and word is getting out. It is getting more popular. Sport fishing charters are getting transporter licenses are starting to sell boat based hunts and it's going to start getting a lot more crowded with a lot more pressure. It happened on Kodiak and thank goodness they lowered their deer limit to one for non residents because the boats were putting a real hurting on the hunt quality in alot of areas. The same thing will happen in the abc islands if you allow it. Please don't raise the deer limit. What out of state hunter needs to shoot four deer?

**PC47****Name:** Larry Landry**Community of Residence:** Gustavus**Comment:****Proposal 23: Oppose**

Proposal 23 which proposes allowing nonresident hunters to take four deer in Unit 4 is a bad idea. ADF&G's justification for the proposal leans heavily on the health of the Chichagof deer herd. What immediately came to my mind when I read this proposal-- because snow is the defining factor of herd dynamics here--what will happen when a bad winter hammers them? Unfortunately, it seems likely we are about to find out, that the heavy snows we just had will cause a large winter kill across northern southeast/Chichagof Island. Hunting will likely be tough over the next few years. Why encourage more Outside hunters to compete with us?

**PC48****Name:** Derek Larsen**Community of Residence:** Juneau**Comment:****Proposal 1: Support**

I thought this was already the case

Proposal 2: Support

I thought this was already the case

Proposal 3: Oppose

Albeit the weather in Southeast Alaska is challenging allowing same day airborne take of goats would interfere with fair chase of the animals.

Proposal 4: Support

I think this will decrease the amount of wounded animals that eventually die and improve heard quality

Proposal 5: Support

Spring black bear hunting in southeast tends to be more popular due to the use of meat and hides. it appears to me the brown bear population seems to be expanding and pushing black bears out of areas along unit one. Increasing the take of brown bears by hunters who are already pursuing brown bears and would simply like to take them more often may help reduce the pressure on the black bear populations by brown bears.

Proposal 6: Support

More chance at taking wolves along the beaches as spring weather improves

Proposal 7: Support

More chance at taking wolves along the beaches as spring weather improves

Proposal 16: Oppose

This would limit the harvest of species that summer here and head south early. This would be notable in Gustavus and usually in Juneau as the population of sandhill cranes in Gustavus typically moves south before the first of October. In Juneau, we usually see a small push of sandhill cranes at some point in September. Depending on the severity of storms during the month of September, we also get small pushes of snow geese and speckled belly geese. I've even seen groups of Brants. If this goes through, the already limited opportunity to harvest this species would be completely gone. I assume this is proposed by a guide who would like a longer opportunity to hunt trophy-quality birds for his clients for mounting.

Proposal 19: Support

This would give hunters more opportunity for hunting coastal bears with the improving spring weather.

Proposal 23: Oppose

Many of the non-resident hunters come for trophies, not for the game meat. There is no reason to increase the non-resident limit and add more pressure to a unit that provides meat for the resident communities.

Proposal 27: Support

Douglas receives a lot of pressure from Juneau, and changing the regulation to prohibit the take of does would likely result in population improvement and therefore more opportunity for take by Juneau residents

Proposal 33: Support

Increase take of brown bear to remove pressure off of other species

Proposal 34: Support

There are large resident populations of deer and bear on the Juneau road system. Some of which become nuisance animals. Allowing for the take of big game closer to the Juneau road system would help alleviate the need of Fish and Game to euthanize nuisance

Proposal 35: Support

There are large resident populations of deer and bear on the Juneau road system. Some of which become nuisance animals. Allowing for the take of big game closer to the Juneau road system would help alleviate the need of Fish and Game to euthanize nuisance animals.

Proposal 40: Support

Residents should have more rights than the non residents

Proposal 41: Support

Residents should have more rights than the non residents

Proposal 47: Oppose

Whenever meat is able to be salvaged for human consumption it should be consumed

**PC49**

Name: Cody Ledoux

Community of Residence: Point Agassiz

Comment:

I dont know if this is the proper place to bring this up but I have been down here for about 6 years now. I am a disabled veteran with major health issues, physical injuries from a training accident that have made it extremely hard for me to get around and trap. But when we do trap here in 1b we have to seal our marten. Im from the Interior where I kniw there is way more marten caught (even though I personally have done better down here when I am able to trap) but up there we didnt have to seal marten.

I really dont see the reason in getting marten sealed down here when it is the most plentiful furbearer in the area. Is there a reason it is still being sealed here?

Thanks

Proposal 65: Support

I am a disabled veteran who has lived off grid in Alaska for 15 years now. The 1st 11 years was spent on Volkmar Lake, outside of Delta Jct. In an any bull area. I was fortunate enough to harvest a moose every year, which made it affordable to live. But there were no women out there! So I hoped on the internet and met and married an amazing woman who has lived off grid at Point Agassiz since she was a teenager. (Her childhood was off grid in Hoonah) anywho, we live off deer but her and her father's entire life they have never had the opportunity to harvest a legal bull because the genetics down here in 1B leaves full grown bulls with small racks or 14" single-single brow tines. Having a brow tine restriction has bred out all the symmetrical bulls so now there is only the asymmetrical moose left. And the moose season is a month long.

**PC50**

Name: Eric Lee

Community of Residence: Petersburg

Comment:

Proposal 67: Oppose

Opening this area to bow hunting is inconsistent with present uses.

Proposal 68: Oppose

Opening this area to bow hunting is inconsistent with present and traditional uses



TESTIMONY COMMENTS OF ERIC LEE TESTIFIED AT JANUARY 7 2026 PETERSBURG ADVISORY COMMITTEE MEETING REGARDING PROPOSALS 67 AND 68.

My name is Eric Lee. My testimony regards proposals 67 and 68.

I was born here in Petersburg in 1951 and started hunting at an early age. When I was in high school from 1965 to 1969 I hunted deer each fall and deer were very plentiful. The bag limit on Mitkof Island was 4 deer each year. Many families had multiple hunters in their families, so venison was a large part of their diet.

The winter of 1972 was particularly severe. The long cold spells and deep snow made it difficult for deer to find food. Large areas of low elevation old growth timber which was the deer's winter habitat had been eliminated by industrial scale clear-cut logging. The large population of wolves on the island, which always accompanied a higher deer population in those days, ate virtually all the deer that did not starve to death. The result was a complete crash of the deer population. The deer season on Mitkof was shut down in an attempt to rebuild the deer population, and the season remained closed for 17 years. When the season reopened, the bag limit was for one buck, and the season was just two weeks long. Decades later, that extremely restrictive harvest limit remains in effect today.

The recovery of the deer population on Mitkof Island has been very slow but steady. The areas proposed to be opened for bow hunting have always been some of the best habitat on the island. This is largely due to the abundance of forage and proximity to old growth winter habitat that was not logged because it was close to the Mitkof Highway.

The ongoing die-off of deer on Mitkof due to the harsh winter conditions we are now experiencing is a good example of why maintaining the long-standing closure of this valuable habitat area is so important. This is not the last harsh winter. There are countless harsh winters to come. The current management strategy of keeping these areas closed to hunting should remain as it is.

If these proposals were to pass, it would likely result in a lot more bow hunters hunting there than there would be initially. The inflation of food prices and food insecurity in general is really just beginning. So that could lead to more management regulations, more deer harvested than initially imagined, and more interaction between bow hunters and the general public. So those voting on these proposals should consider this as the likely scenario they are voting on tonight.

In addition to deer, proposals 67 and 68 would also open these areas to the bigger game of moose and black bears. These bigger animals require much more powerful bows. The arrows fly further and with more force. In Southeast Alaska, black bears are hunted on the beaches, tidelands, and open grass flats such as along the whole length of the Blind Slough watershed, which is such an important recreation and wildlife viewing area. Arrows shot from a high-powered bow would fly much further than a regular bow, especially in the wide open grass flats and tidelands in that area.

Also, animals shot with bow and arrow do not drop where they are or very near where they are. They usually run some distance before they fall and die. If a big game animal is shot by an arrow and only wounded, it may require another shot or more in a direction that the hunter had not expected, and where people could be, or it can become a dangerous animal and a threat to public safety.



The fact that deer shot with bow and arrow typically run some distance before expiring also causes law enforcement issues. There is no way to tell which way an animal will run. A deer, bear or moose could run into a closed area where it is illegal to hunt or where people are present. A bear or moose that did not die and ran off wounded could present a real danger to public safety. Enforcement of the boundaries could be problematic for law enforcement. Any changes in regulations that could cause such potential problems should be avoided.

The northern portion of the area that would be opened to bow hunting is too populated. There are too many homes scattered along that stretch of Mitkof Highway. Opening the southern portion of the proposal area is not at all consistent with the present and traditional uses of the area as the Blind Slough watershed is a natural treasure for our community used for recreation, berry picking, mushroom gathering, bird watching, as well as hunting in the large areas that are open for hunting.

It is by far the most visited destination. Due to its easy access, it provides opportunities for travelers who cannot afford expensive charters to experience and photograph deer and other wildlife. The swan observatory provides opportunities to view Trumpeter swans in their native habitat. The wheelchair accessible trail down to the Blind River rapids provides great public access to the magnificent views of the broad grass flats and estuarian habitat of lower Blind Slough. The rapids provide the best salmon fishing anywhere on Mitkof Island and attracts fishermen from far and wide as well as providing subsistence fish for our local families. These, and the opportunity to view Alaskan big game in an area so close to our town simply cannot be overestimated. The area and its wildlife helps make our town what it is.

So I encourage the advisory board not to support any changes to the present management plan that has worked so well for so many years, and continues to be the best management plan for the future.

Thanks for this opportunity to comment.



Name: Chris Lillehoff

Community of Residence: Sitka

Comment:

Proposal 1: Oppose

I feel civil twilight can still yield safe, reasonable assessment of big game animals for harvest.

Proposal 2: Oppose

I feel civil twilight can still yield safe, reasonable assessment of big game animals for harvest.

Proposal 3: Oppose

No same day air. Very opposed.

Proposal 4: Oppose

Not in favor

Proposal 5: Support with Amendment

Support with exclusivity to resident hunters only for a trial period of 3 years for hunter days afield/success.

Proposal 6: Support

Pred management

Proposal 7: Support

Pred management

Proposal 8: Support with Amendment

Open season with taking of females with kittens monitored and studied.

Proposal 9: Support with Amendment

Open season with an exclusion of the taking of females with kittens monitored.

Proposal 10: Support

Beavers are low number harvest with low prices on world market. Most beavers are too remote and sparsely populated to be an over harvest issue in SE. Beaver sealing is a waste of time and man hours.

Proposal 11: Oppose

Negative vote

Proposal 12: Oppose

Oppose.

Proposal 13: Oppose

Oppose. Thermal and NV optics are cost prohibitive to majority of hunters. The taking of furbearers with said optics would be a great opportunity for a select few but would hamper no other sportsmen just due to deer or elk being open.

Proposal 14: General_Comment

No stance.

Proposal 15: General_Comment

No comment.

Proposal 16: Oppose

I am a waterfowl guide in Sitka. We have a wonderful season as is. The opening currently aligns with amazing harvest of teal/ pintails/white fronts, that are early departures from our country but we get an opportunity at them.

Changing the season dates would create a situation that would prevent the opportunity for hunters to go afield before our productive deer season starts to yield success.

My clientele has more than adequate chances at mature, well plumed sea ducks and mallards throughout November. The change is unnecessary.

Proposal 17: General_Comment

No stance

Proposal 18: General_Comment

No stance

Proposal 19: Support

Support

Proposal 20: Support

Agree

Proposal 21: Support

Agree

Proposal 22: Support

Agree

Proposal 23: Support with Amendment

If the biological data supports the move I am for it.

Carrying capacity on the landscape seems to be precariously balanced as is but the amount of non res pressure/harvest is most likely a low figure and wouldn't impact the biomass.

Proposal 24: Oppose

Let it remain the same.

Proposal 25: General_Comment

No comment

Proposal 26: Oppose

It's called goat hunting not billy hunting.

Proposal 27: General_Comment

No comment

Proposal 28: General_Comment

No comment

Proposal 29: General_Comment

No comment

Proposal 30: Oppose

No special circumstances

Proposal 31: General_Comment

No comment

Proposal 32: General_Comment

No comment

Proposal 33: General_Comment

No comment

Proposal 34: General_Comment

No comment

Proposal 35: General_Comment

No comment

Proposal 36: General_Comment

No comment

Proposal 37: General_Comment

No comment

Proposal 38: General_Comment

No comment

Proposal 39: General_Comment

No comment

Proposal 40: General_Comment

No comment

Proposal 41: General_Comment

No comment

Proposal 42: General_Comment

No comment

Proposal 43: General_Comment

No comment

Proposal 44: Oppose

Fair draws statewide

Proposal 45: Oppose

Fair draws statewide

Proposal 46: Oppose

Fair draws state wide

Proposal 47: Oppose

Eat the meat

Proposal 48: Support with Amendment

Support with management input

Proposal 49: Support

Increase harvest with monitoring

Proposal 50: Support with Amendment

With management input

Proposal 51: Support with Amendment

With management input

Proposal 52: Support with Amendment

With ADFG bio managing

Proposal 53: General_Comment

No comment

Proposal 54: General_Comment

No comment

Proposal 55: Oppose

Increase of Pred management

Proposal 56: Oppose

Allow the use

Proposal 57: Support

Introduced species that lives in inhospitable country. Season should be long and restrictions loosened for hunter harvest.

Proposal 58: Support

Non native species costing state money in management. Allow harvest.

Proposal 59: Oppose

Why manage a hunt that few are successful in? Open it up.

Proposal 60: Oppose

Opposed

Proposal 61: Oppose

Opposed

Proposal 62: Oppose

Opposed

Proposal 63: Support

In favor

Proposal 64: General_Comment

No comment

Proposal 65: General_Comment

No comment

Proposal 66: General_Comment

No comment

Proposal 67: General_Comment

No comment

Proposal 68: General_Comment

No comment

Proposal 69: General_Comment

No comment



PC52

Name: Davey Lubin

Community of Residence: Sitka

Comment:

Proposal 23: Oppose

I've been hunting in Region 4 for more than 40 years.

Venison is a vital component in the subsistence diets of a broad range of individuals and families who live in the Sitka area. The act of harvesting deer from the shores, muskegs, alpine areas, and forest lands contributes immeasurably to the overall health, both physically, socially, and mentally, of our remote community. Increasing non-resident bag limits would most certainly increase incentive for non-resident hunters to travel to Sitka. This would undoubtedly create unwelcome competition for locals trying to feed their families and create undue pressure on our healthy deer populations. Once this gate is opened, it will be a challenge to close it. I rue the day when I see a steady stream of cooler after cooler, filled with locally cherished venison, at the Sitka Airport, heading south.

I respectfully urge the game board to reject this proposal.

Thank you

Davey Lubin, Sitka

**PC53****Name:** Laura Marcus**Community of Residence:** Gustavus, AK**Comment:****Proposal 23: Oppose**

I am a year-round resident of Gustavus, Alaska, along with my husband and 2-year-old son. Both my husband and I are hunters, and 100% of our household's meat comes from fish and deer that we harvest locally. In the many years that we have been hunting, we have noticed a steady uptick of pressure on the deer population from nonresident hunters. Sitka blacktails are a crucial source of nutrition for us, living as we do in a place where cancelled ferries and weeks without plane service can quickly leave the grocery store shelves bare. For that reason, I was already opposed to this proposal when it first came out. Now, with the record setting snows our region has seen, the situation has become critical. Every knowledgeable hunter expects a massive deer die-off this year. Those of us who rely on the deer as a staple of our food supply are already anxious about filling our freezers next year. Adding further hunting pressure from those who do not need the meat would only add insult to injury. I therefore strongly recommend that the board turn down this proposal.

**PC54****Name:** Jamalea Martelle**Community of Residence:** Juneau**Comment:****Proposal 1: Support**

I support Proposal 1 because it addresses the safety and ethical issues of hunters using artificial light.

Proposal 2: Support

I support Proposal 2 because it addresses the safety and ethical issues of hunters using artificial light.

Proposal 16: Oppose

I oppose Proposal 16 as I believe it will ultimately limit hunting opportunities. I am an adult-onset hunter, now in my 14th year of hunting waterfowl in Southeast Alaska. I am an Ambassador for Artemis Sportswomen, which aims to build women's confidence, knowledge and skills in the hunting, fishing, and conservation realms. I primarily waterfowl hunt on the Mendenhall Wetlands State Game Refuge in Juneau, AK. The Refuge offers amazing opportunities for waterfowlers because of its accessibility and habitat. I believe in maximizing hunting opportunities that are accessible, safe, and encourage youth and beginner hunters to participate. A later season does not support these objectives.

A season that spans over a greater amount of winter days means fewer opportunities for hunters. Less daylight limits hunting hours. Limited hours will concentrate hunting efforts to the weekends, leading to increased pressure, safety concerns, and conflict. The Refuge is utilized by a variety of user groups that already have a history of conflict with waterfowl hunters. I anticipate that concentrating usage to the

weekends in January will increase the potential for conflict. Personally, I enjoy opportunities in the early season to hunt a few hours before or after work and I have witnessed many youth on the Refuge after school hours. Hunting in January removes that opportunity.

Pushing the season dates further into January will expose hunters and dogs to colder temperatures, harsher conditions and increased safety risks. I support efforts for hunter recruitment and retention; therefore, I believe beginner hunters should have opportunities to gain experience and build skills in conditions that are warmer and more enjoyable so they can focus their energy on important tasks at hand. In the event of extreme weather events, such as the current state of Southeast Alaska 2025/2026, the accumulation of snow and ice has either completely blocked off access points or severely limited accessibility to hunting grounds.

I am an advocate for community centered approaches to regulations that benefit Alaska residents and the future growth of hunters, and this proposal does not support that.



PC55

Name: Derek Mason

Community of Residence: Juneau

Comment:

Proposal 23: Oppose

It's obvious that the deer guides are extremely close with fish and game that's the only reason this proposal is pushed so hard .

Proposal 29: Support

Seems reasonable

Proposal 31: Support

Seems reasonable .

Proposal 34: Oppose

Doesn't really make much sense .

Proposal 35: Oppose

As soon as all the archery hunters are out thane road the other locals besides the couple proposing this are gonna be pretty upset with the increase traffic .

Proposal 40: Support

Seems like a reasonable proposal.

Proposal 41: Support

Seems reasonable

Proposal 42: Support

Seems logical maybe push it to September even.



Name: Christopher McFadyen

Community of Residence: Petersburg

Comment:

Proposal 1: Oppose

Proposal 2: Oppose

None

Proposal 3: Oppose

None

Proposal 4: Support

None

Proposal 5: Support

None

Proposal 6: Support

None

Proposal 7: Support

None

Proposal 8: Support with Amendment

I don't support the proposal as written but will support as an addition to the unclassified game with white tail and mule deer.

I feel they should be legal to harvest, but not as an actual sanctioned hunt.

Proposal 9: Support with Amendment

Same as my comment on proposal 8

Proposal 12: Oppose

None

Proposal 13: Oppose

None

Proposal 16: Oppose

None

Proposal 17: Oppose

None

Proposal 18: Support with Amendment

I personally prefer proposal 69. I feel that more opportunity during the mating season is gonna be acceptable and add increased opportunity for all hunters, including youth who are out of school.

Proposal 19: Support

None

Proposal 26: Oppose None

Proposal 44: Oppose

None

Proposal 45: Oppose

None

Proposal 46: Oppose

None

Proposal 57: Oppose

I feel This would be unsustainable for the bull elk population on the island.

Proposal 58: Oppose

Are we trying to wipe out the entire elk herd off the island?

Getting a handle on the illegal harvest of elk on the island would be a good move before designating more hunting opportunity.

Proposal 63: Support

None

Proposal 64: Oppose

None

Proposal 65: Oppose

None

Proposal 66: Support

None

Proposal 67: Support

None

Proposal 68: Support

None

Proposal 69: Support

None



PC57

Name: Dan McMahon

Community of Residence: Petersburg

Comment:

Proposal 67: Support

More opportunity for archers. Potentially take a few deer that would eventually be taken by vehicles.

Proposal 68: Support

More opportunity for archers.



PC58

Name: Heather Miethe

Community of Residence: Wrangell

Comment:

Proposal 1: Support

I support this rule, because it not only makes hunting areas safer for hunters, but it also ensures hunters have the ability to make humane hunting decisions and better kill shots when they can clearly see their targets. Dim lighting in forested areas and brushy locations may distort a persons vision and thus cause inaccurate shooting practices, resulting in wounded game and dangerous hunting practices.

Proposal 2: Support

This rule ensures that the hunters in an area are able to clearly see fellow hunters, creating safer hunting environments. Hunters make better kill shots, when they can clearly see their targets. Dim lighting can cause hunters to misjudge distance and placement of their targets and also distort between movement of prey and movement of fellow hunters. It's just safer hunting practices, when after dusk hunters aren't taking risky chances.

Proposal 8: Oppose

I don't feel an open season is humane. I support an established season made during such time periods that the cougars are not mating or birthing.

Proposal 9: Support

I support establishing a set season for the hunting and trapping of mountain lions that do not correspond to their mating or birthing seasons.

Proposal 10: Support

I support this proposal, because the smaller prey are usually harvested in larger numbers and therefore it is harder to transport the hides to the sealers. I support removing sealing requirements on lesser, smaller game.

Proposal 12: Support

I support this proposal not only because night vision abilities are not necessary for taking furbearers, but also because hunters use this as a way to use night vision devices for hunting large game. Allowing such devices will allow certain individuals to lie about their use of these devices. I see no advantage of allowing for these devices.

Proposal 13: Support

If night vision devices are even allowed at all, I strongly support prohibiting their use during deer seasons, as users of these devices will use them for deer, as they already are, causing unsafe and inhumane hunting practices.

Proposal 23: Oppose

I oppose any proposal that would give nonresidents more of our resources that are needed by the residents of Alaska.

Proposal 51: Support

We are already seeing an increase of wolf populations on Prince Of Wales Island, every year. I support extending the wolf season in order to keep the population of wolves in check to ensure healthier deer populations. Large packs systematically push deer herds out to small peninsulas and then decrease their numbers rapidly, such as at the north end of the island. Extending the wolf season will help to ensure both deer populations and wolf populations are at a number which will ensure healthy coexisting.

Proposal 52: Support

It is very important that the wolf population is monitored on Prince of Wales. In past years, I have read published reports about wolf populations in Unit 2, which I know are not accurate, as I see visual proof that these tallies are inaccurate. Careful intensive research is needed to ensure data is being correctly gathered, so we can make accurate management practices.

Proposal 55: Support

Again, there is no need to allow night vision or infrared devices for the taking of any animals for if allowed for furbearers, it will be abused and will have crossover effects on the large game hunting in these areas.

Proposal 56: Support

I support prohibiting night vision or infrared devices during all deer seasons, as some hunters will use the excuse they are trapping to use these devices for deer hunting and it will be harder to enforce deer hunting laws if these are allowed during deer season.

Proposal 57: Support

I think it would be beneficial for residents to have more opportunities to harvest elk on Zarembo Island.

Proposal 64: Support with Amendment

I support a proposal that protects hunters from hard to distinguish broken and damaged horn configurations in the field, however I believe that altered horns or broken horns are manufactured by hunters in order to retain their illegally taken moose. I would support amending this proposal to excluding a broken or damaged or altered antler only once to every hunter. As moose hunters you are allowed only one such moose per every 5 years.

Proposal 65: Oppose

I strongly oppose this proposal for several reasons. We are seeing record successful hunts in these areas with fewer illegals every year. These herds are healthy and growing and migrating. The antler restrictions in these areas are ensuring this healthy growth and migration and successful hunting records, why change what is working? If this proposal passed, it would not only affect these herds negatively, it would congest these hunting areas even more, causing larger numbers of bulls taken by more hunters, resulting in a devastation of these herds, that are producing ample numbers of legal bulls for the taking. In unit three we have a healthy number of hunters taking more and more legal bulls every year and the established season ensures we all have ample time to hunt the rutting season. Shortening the season, with the unpredictability of each annual rutting seasons start date, would make for more unsuccessful hunting. I oppose all aspects of this proposal. I have had successful moose hunts for 8 years in a row in Unit 3. I have seen first hand the growth of this herd and it has been growing and expanding. Every year hunters arrive at different intervals and we all seem to have more than ample chances for legal bulls. The antler restriction ensures we don't harvest too many bulls out of the fragile balance of mature bulls and the season duration creates ample time for several groups of hunters to have successful hunts. I see no reason in Unit 3 to change any antler restrictions or season dates. Changes should be implemented when regulations are not working for the areas herd population or for the number of successful hunts, however this is not the case in Unit 3. Why would changes need to be implemented in an area that is thriving for both the moose population and the hunters? The moose herd in unit 3 is fragile, allowing an any bull hunt would only ensure, that in a few short years, there would no longer be a herd. I have been visiting Kuiu Island for 25+ years, and I have seen first hand the migration of these moose from no moose, to a few sightings, to a few legal bulls a year, to enough legal bulls to ensure successful hunts for several hunters a year. I see young bulls thriving and older bulls procreating and there are healthy numbers of legal bulls left over every year to ensure a healthy herd for the next year. Why would implementing any change be necessary? Kuiu Island is an area where game management is being used to the betterment of the game and the hunters perfectly. I see no reasoning behind this proposal. I do not feel that moose areas in Southeast Alaska can be lumped together, when proposing regulatory changes, as they all have their unique variables from herd population to heredity identities, to accessibility and hunter numbers. I know for a fact that Kuiu Island is producing successful hunts and has a healthy population of legal bulls to ensure healthy hunts for years to come, this proposal would be a step backward in any game management practices. Kuiu Island has a unique and thriving herd and can stay this way for years to come if the antler restrictions and season duration regulations stay as they are now. If this proposal passes it will eliminate this herd in a few years, congest the area with more hunters, causing safety hazards, as there are limited access points to these herds. Adding more hunters in a shorter hunting period to harvest any bull from a small emerging herd would be using unsound wildlife management practices. Why trade a sound working model for the exact opposite?

Proposal 69: Oppose

I oppose this proposal as we are seeing less and less grouse every year due to the taking of too many birds on Kuiu during the annual moose hunting season. Hunters do not travel to Kuiu to hunt grouse they take them when they are there moose hunting. Extending the season would only create a smaller grouse population.



PC59

Name: Joshua Miethe

Community of Residence: Wrangell

Comment:

Proposal 1: Support

I was under impression this was already the law no night hunting if its dim out don't shoot it

Proposal 2: Support

once again I'm against night hunting its dangerous and not fair hunt

Proposal 8: Support

cougars are an invasive specie don't like to see them around

Proposal 9: Support

if a person is lucky enough to catch a mountain lion in there traps should be allowed to harvest it

Proposal 12: Support

people are using the excuse for having night vision of trapping when in fact using to spot deer at night I'm against night vision .

Proposal 13: Support

if night vision is allowed at all shouldn't be allowed in possession while any open deer seasons

Proposal 18: Oppose

I oppose an extension of the grouse season in unit 3 due to over harvesting the last 5 years we've seen less birds by far the last 3 years in a row in the past we would see 20 or more birds a day in sept-oct moose season this year was all time low of only 3-6 a day some days none at all the primary reason is over harvesting

Proposal 40: Support

these deer are valuable to the rural residents of southeast Alaska I feel some nonresident that comes here to hunt deer should only be allowed 1 deer

Proposal 41: Support

I support reducing the bag limit to one deer for nonresidents harvesting four bucks for a nonresident seems to take away from the rural Alaska resources

Proposal 42: Support

I support changing the start date to august 15 for none residents to limit the pressure on the early hunting season

Proposal 55: Support

I support anything that prohibits the use of night vision or infrared devices be used to harvest any game in Alaska

Proposal 56: Support

I most defiantly support prohibiting the use of night and infrared devices during hunting season this is an excuse to use them to harvest deer in southeast

Proposal 64: Oppose

the horn regulations that are in effect in southeast Alaska are clearly working with more legal bulls being harvested every year this is another attempt to cheat to harvest animals if it has a broken antler to make it legal you will see a big increase in broken antler bulls there is not a shortage of legal bulls a little time and patience and they can be found

Proposal 65: Oppose

I oppose changing the hunting regulations to any bull or the season length, the antler restrictions make hunters take time to study the animal making sure its legal and in a safe spot to harvest not in line with other hunters .The success we are having with the horn restrictions and hunting season should speak for itself, changing it to any bull would have hunters throwing rounds at every rack of horns in unit 3,which would be especially dangerous as there is already too many hunters crowded into a overgrown brushy terrain . besides the danger side of it in a short time these moose would be over harvested and the sub legals and broken antlered bulls that we pass up on that ensures a healthy cow bull population would be decimated.Spending a lot of time in unit 3 mainly Kuiu Island and Kupreanof islands during the 80s and 90s it was fairly uncommon to see a moose if ever on Kuiu , since the horn restrictions of the 90s the moose with more breeding bulls have spread our moose out successfully to a population that has proven our management is working.If a hunter is unsure about the moose's antler configuration then don't shoot continue to hunt you will find a legal bull.

**PC60**

Name: Lance Miethe

Community of Residence: Port Protection

Comment:

Proposal 1: Support

This is the only solution to ensure hunters are making good shots on game and for the safety of other hunters

Proposal 2: Support

Again this is the only way to ensure safe hunts and accurate shots

Proposal 8: Support

I think there numbers are growing and since you don't usually see them if they are being seen that means it is time to ensure the safety of homeowners and pets

Proposal 9: Support

Again this is a good way to ensure there numbers stay in check

Proposal 12: Support

Hunters will just use this excuse to use these devices for hunting, illegally

Proposal 13: Support

These devices should always be prohibited, but most definitely during deer hunting season or law enforcement will not be able to enforce this as hunters will just say they are trapping

Proposal 55: Support

Only way to ensure safe and legal hunts

Proposal 56: Support

Only way to ensure law enforcement can keep hunters from using these devices during hunting.

Proposal 64: Oppose

There is no need to change this regulation as it is working fine and every year less and less illegals are being shot. There is such a small percentage of these antlers in question that there is nothing that warrants changing this regulation that's working to ensure legal bulls are being harvested

Proposal 65: Oppose

There is no need to change this regulation, as we are seeing record breaking bull harvesting seasons. The only reason we have such healthy herds is because of this integral management system, If it aint broke why change anything. If we were to adopt this proposal the herds would be gone in a few short years and no hunting would be available for anyone

Name: Lucas Mullen

Community of Residence: petersburg

Comment:

Proposal 3: Oppose

I am opposed to this proposal. My name is Lucas Mullen, a registered big game guide in southeast Alaska out of Petersburg. As a goat guide I am familiar with the logistics and hazards regarding mountain goat hunting. Allowing same day airborne for mountain goat will increase the take of nannies, not requiring hunters to commit to the hunt and take a closer look at what they are harvesting and lead to conservation concerns in the future.



PC61

Proposal 20: Oppose

I am opposed to this proposal. My name is Lucas Mullen, a registered big game guide in southeast Alaska out of Petersburg. Having guided the area for many years I do not see an issue here with what has been in place regarding season dates and boundaries.

Proposal 21: Oppose

I am opposed to this proposal. My name is Lucas Mullen, a registered big game guide in southeast Alaska out of Petersburg. Having guided the area for many years I do not see an issue here with what has been in place regarding season dates and boundaries.

Proposal 22: Oppose

Sticking with the BBMP that has been in place is working and season dates should not change.

Proposal 26: Oppose

I am opposed to this proposal. As a listed author of this proposal, I would like this to not be taken up by the board. After many discussions with the other authors and user groups several things came to light that has led me to oppose this. The specific area has had several closures recently at the very end of the long season, within a few days of the scheduled closure. This would tell me that very little opportunity is lost for all hunters, while harvesting 100% of the animals ADF&G allows taken in the area. With the relatively newly required “take a closer look” test, we need to give this new requirement a few years to track what affects it has on nanny harvest.

Proposal 31: Oppose

I am opposed to this proposal. My name is Lucas Mullen, a registered big game guide in southeast Alaska out of Petersburg. With the recent DLP of 52 brown bear in the Haines area in 2020, the brown bear regulation of 1 bear every four years should remain in place. Having recreated and worked in the area since 2011 I would say that the population could not maintain a healthy status if this proposal is adopted. It has relatively close access to Juneau and Gustavus, which would lead to more harvest from residents and next of kin that would leading to more sow harvest.

Proposal 32: Oppose

I am opposed to this proposal. My name is Lucas Mullen, a registered big game guide in southeast Alaska out of Petersburg. With the recent DLP of 52 brown bear in the Haines area in 2020, the brown bear regulation of 1 bear every four years should remain in place. Having recreated and worked in the area since 2011 I would say that the population could not maintain a healthy status if this proposal is adopted. It has relatively close access to Juneau and Gustavus, which would lead to more harvest from residents and next of kin that would leading to more sow harvest.



Name: John Murray

Community of Residence: Sitka

Comment:

Proposal 1: Support

I believe East POW AC covered the proposal well. I sit on the Sitka AC and never had any idea this was a loophole. We had a robust discussion about this. I see this as a way to get over on the customary harvest of deer. But if there is a loop hole people will find it. It appears they have.

Why this a detriment to the resource. If you wound an animal during daylight hour one has a decent chance of recovery. The same doesn't hold true for a animal shot toward darkness. It runs off then dies where it would likely not be recovered.

Proposal 2: Oppose

Yes safety is a big issue. More important in my book is fair chase of these goats. This is a way to game the system. It isn't what I would call a "traditional means" of harvest. In UNIT 4 one has to work for a goat harvest. Most of Unit 4 harvest gets filled without any extra pressure being added. In fact many of Unit 4 sub units close before regulatory season ending.

I oppose same day harvest.

Proposal 23: Oppose

I sit on the Sitka AC and voted for this proposal. That was before the "hard winter" we are having and other concerns I've thought about.

One : hard winter , much of Unit 4 is being hit by deep snow and very cold for this area this will no doubt add to harvest (Sitka area) and a winter die off. SE in general has been lulled into thinking we would have another mild winter. The last tough winter was perhaps 7 years back. The same thing that happen then is happening now, increased harvest and winter mortality.

Two: Unit 4 is a large area it covers a number of large islands and island groups. Sitka the largest town sits on the outside coast therefore it is usually milder. Pelican , Hoonah and Tenekee are a much different story all together., colder and more snow pack. I believe one size does not fit all because of this. While there is the NE area which would be closed to NR harvest that just puts people into the close proximity on these villages.

Three: while NR harvest is minimal I don't see that as a reason to add harvest. Or build it and they will come. 2 bucks especially the size preferred is a lot of meat. I have harvested three small buck this season that is plenty for a household of two with some to share.

For the following reason I'm oppose to added NR harvest. It isn't really needed and could put some villages at risk of not enough animal available after a hard winter and added harvest the following season.



United States Department of the Interior

NATIONAL PARK SERVICE

Interior Region 11 • Alaska
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

AKRO (A10)

January 8, 2026

Mr. Jake Fletcher, Chair
ATTN: Alaska Board of Game Comments
Alaska Department of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Fletcher,

The National Park Service (NPS) appreciates the opportunity to comment on proposals for Southeast Region regulations being considered by the Alaska Board of Game. We value our role in this important process. Below is a recommendation on a proposal that affects NPS areas.

Proposal 4: NPS Recommendation: Support.

Proposal 4 would amend the definition of "taken" for mountain goat in Units 1-5 to "when struck by a projectile," which would align the definition of a "taken" mountain goat with the definition of a "taken" brown bear for these units. The NPS supports making regulations consistent across these species to allow for consistency in harvest reporting and enforcement across big game species in these units.

Thank you for the opportunity to comment. Please feel free to contact me if there are any questions.

Sincerely,

**DONALD
STRIKER**

Digitally signed by
DONALD STRIKER
Date: 2026.01.08
15:28:54 -09'00'

Don Striker
Regional Director
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INTERIOR REGION 11 • ALASKA



OFFICE OF SUBSISTENCE MANAGEMENT

RECOMMENDATIONS

on

ALASKA BOARD OF GAME PROPOSALS

Southeast Region Meeting

January 23 – 27, 2026

Wrangell, Alaska

Office of Subsistence Management (OSM)



PROPOSAL 1 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions.

Prohibit the take of big game animals between civil twilight of sunset until civil twilight of sunrise the following day in Units 1-5.

Current Federal Regulations:

§__.26

*(b) **Prohibited methods and means.** Except for special provisions found at paragraphs (n)(1) through (26) of this section, the following methods and means of taking wildlife for subsistence uses are prohibited:*

(8) Using or being aided by use of a pit, fire, artificial light, radio communication, artificial salt lick, explosive, barbed arrow, bomb, smoke, chemical, conventional steel trap with a jaw spread over 9 inches, or conibear style trap with a jaw spread over 11 inches.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Proposal WP26-02, submitted by the East Prince of Wales Fish and Game Advisory Committee (AC), requests to prohibit the take of big game in Units 1-5 from civil sunset until civil sunrise. The Federal Subsistence Board (FSB) will act on this proposal at their wildlife regulatory meeting in April 2026.

Impact to Federal subsistence users/wildlife: If this proposal is adopted, the harvest of big game would be prohibited in Units 1-5 from civil sunset until civil sunrise under State regulations. This regulatory change could eliminate a perceived loophole in current regulations and may discourage illegal harvests of big game using artificial light. However, the use of artificial light is already prohibited for harvesting big game, and most hunters typically do not hunt big game in the dark because it is unsafe and impractical. Therefore, if this proposal is adopted, there would likely be minimal effects on federally qualified subsistence users as well as the big game populations covered under these harvest restrictions.

Adoption of this proposal may result in alignment or misalignment with Federal regulations depending on FSB action on WP26-02, impacting regulatory complexity and enforcement effectiveness. Federal law enforcement officers expressed an interest in maintaining alignment with State regulations (Boggs 2025, pers. comm.). However, adopting this proposal may not resolve all law enforcement concerns expressed by the proponent over the perceived regulatory loopholes exploited by unethical hunters. Because enhanced night vision and forward-looking infrared devices are allowed in the take of furbearers under State regulations, these devices could also be used to clandestinely harvest big game at night. Federal regulations do not currently prohibit the use of electronically enhanced night vision or forward-looking infrared devices.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.

Rationale: The Office of Subsistence Management supports effective regulatory enforcement, which requires alignment of Federal and State regulations on this issue.

Literature Cited



Boggs, B. 2025. Law Enforcement Officer. Personal communication: e-mail. United States Forest Service. Petersburg, Alaska.

PROPOSAL 2 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions.

Prohibit the take of deer between civil twilight of sunset until civil twilight of sunrise the following day in Units 1-5.

Please see comments on Proposal 1.

PROPOSAL 3 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions.

Allow the same day airborne take of goats in Units 1-5.

Current Federal Regulations:

§__26

(b) Prohibited methods and means. Except for special provisions found at paragraphs (n)(1) through (26) of this section, the following methods and means of taking wildlife for subsistence uses are prohibited:

(16) Taking or assisting in the taking of ungulates, bear, wolves, wolverine, or other furbearers before 3 a.m. following the day in which airborne travel occurred (except for flights in regularly scheduled commercial aircraft). This restriction does not apply to subsistence taking of deer (except on NPS lands) and of caribou on the Nushagak Peninsula (a portion of Units 17A and 17C) during Jan. 1-Mar. 31, provided the hunter is 300 feet from the airplane; moreover, this restriction does not apply to subsistence setting of snares or traps, or the removal of furbearers from traps or snares.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal would allow hunters to spot goats from small aircraft, land, and then immediately travel to where the goats are located. This provides an advantage to users with planes and could result in harvest quotas quickly being met or exceeded, creating conservation concerns. It also disenfranchises federally qualified subsistence users who do not own planes or have the resources to hire one. It could also result in seasons closing earlier (as quotas would be reached sooner), reducing opportunity.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2027.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.



Rationale: OSM does not consider same-day airborne harvest of goats to be a sound wildlife management practice. This provides great advantages to hunters in small aircraft and could result in overharvest of goats, which are closely managed to maintain sustainable harvests.

PROPOSAL 5 – 5 AAC 85.020. Hunting seasons and bag limits for brown bears.

Increase the brown bear bag limit in Unit 1 Remainder, to one bear every regulatory year instead of one bear every four regulatory years.

Current Federal Regulations:

Unit 1 —Brown bear

1 bear every 4 regulatory years by State registration permit only *Sep. 15-Dec. 31*

Mar. 15-May 31

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal increases opportunity for federally qualified subsistence users hunting under State regulations. However, conservation concerns are unknown as OSM does not have enough current information for full evaluation.

Adoption of this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2027.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.

Rationale: This proposal increases opportunity for federally qualified subsistence users. However, conservation concerns and impacts on the Unit 1 brown bear population are uncertain.

PROPOSAL 6 - 5 AAC 85.056. Hunting seasons and bag limits for wolf.

Align the wolf hunting seasons in Unit 1 by extending the seasons for Units 1B, 1C and 1D to May 31.

Current Federal Regulations:

Unit 1 –Wolf Hunting

Units 1A and 1B, south of Bradfield Canal and the east fork of the *Aug. 1-May 31.*
Bradfield River—5 wolves



Units 1B, remainder, 1C, and 1D—5 wolves

Aug. 1-Apr. 30.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife:

If this proposal is adopted, the wolf hunting season in Units 1B remainder, 1C, and 1D would be extended, providing federally qualified subsistence users with an additional month to harvest wolves under State regulations. This would provide more opportunities to fulfill subsistence needs.

Impacts to the wolf population are uncertain but expected to be minimal as available data indicates that most wolves in all of Unit 1 were harvested using traps or snares (Churchwell 2021; Dorendorf 2021; Koch 2023; Robbins 2025). Additionally, wolf populations are resilient and, as stated by the proponent, participation and additional harvest during May is expected to be low. However, females with dependent young may be harvested in May, negatively impacting pup survival. Pelts are also not as prime during May.

Adopting this proposal would also misalign Federal and State regulations, increasing regulatory complexity and potentially, law enforcement concerns. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2027.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 6.

Rationale: Adopting this proposal increases opportunity for federally qualified subsistence users. While conservation concerns seem unlikely, OSM does not have enough current information for full evaluation.

Literature Cited

Churchwell, R. T. 2021. Wolf management report and plan, Game Management Unit 1C: Report period 1 July 2015–30 June 2020, and plan period 1 July 2020–30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-22, Juneau. AK.

Dorendorf, R. 2021. Wolf management report and plan, Game Management Unit 1A: Report period 1 July 2015–30 June 2020, and plan period 1 July 2020–30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-35, Juneau. AK.

Koch, C. H. 2023. Wolf management report and plan, Game Management Unit 1D: Report period 1 July 2015–30 June 2020, and plan period 1 July 2020–30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-11, Juneau. AK.

Robbins W. F. 2025. Wolf management report and plan, Game Management Unit 1B: Report period 1 July 2015–30 June 2020, and plan period 1 July 2020–30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2025-23, Juneau. AK.

PROPOSAL 7 - 5 AAC 85.056. Hunting seasons and bag limits for wolf.

Align the wolf hunting seasons in Unit 1 by extending the seasons in Units 1A, 1B and 1C to May 31.

Please see comments for Proposal 6.



PROPOSAL 17 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

Change the bag limit for grouse in the Southeast Region.

Current Federal Regulations:

Units 1, 2, 3, 4 & 5–Grouse

5 per day, 10 in possession

Aug. 1–May 15.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: In Units 1–5, Federal regulations currently mirror State regulations. Adoption of this proposal would not affect federally qualified subsistence users’ ability to harvest grouse on Federal public lands. However, it would reduce Federal users’ opportunity to harvest grouse under State regulations. Additionally, federally qualified subsistence users would need to differentiate land status if they harvest female grouse from Mar. 15–May 15.

Adopting this proposal would misalign Federal and State regulations, increasing regulatory complexity and, potentially, law enforcement concerns. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2027.

Effects on the grouse population are uncertain, but expected to be minimal since, as the proponent states in their proposal, there are no conservation concerns for grouse in the Southeast region. Sooty grouse numbers in Southeast Alaska were estimated to be good in 2025 near Petersburg and Ketchikan, while numbers around Juneau may have decreased compared to the previous year (Carroll and Spivey 2025). Hunter-harvested wing data suggests lower juvenile production in RY24 compared to RY23, though the smaller-than-average sample size limits the strength of this conclusion (Carroll and Spivey 2025).

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: While the intent of this proposal is to add protection for the reproductive segment of the population, this would create an unnecessary and confusing restriction. The limited information available does not demonstrate a biological need for restricting the harvest limit to males only. Added confusion may occur depending on whether grouse are hunted by shotgun or .22. If grouse are shot on the wing, there would be little time to determine sex before a grouse is harvested, potentially leading to illegal harvest. Additionally, adopting this proposal would decrease harvest opportunities for federally qualified subsistence users under State regulations.

Literature Cited

Carroll, Cameron J. and Timothy J. Spivey. 2025 Alaska Small Game Summary 2025. Alaska Department of Fish and Game, Division of Wildlife Conservation. Juneau, AK.



PROPOSAL 18 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

Shift the hunting season for grouse in Units 1-5 to August 10 through May 31.

Current Federal Regulations:

Units 1, 2, 3, 4 & 5–Grouse

5 per day, 10 in possession

Aug. 1–May 15.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: In Units 1–5, Federal regulations currently mirror State regulations. Adoption of this proposal would not affect federally qualified subsistence users’ ability to harvest grouse on Federal public lands. However, it would increase Federal users’ opportunity to harvest grouse under State regulations in late May, but decrease it in early August.

Adopting this proposal would misalign Federal and State regulations, increasing regulatory complexity and, potentially, law enforcement concerns. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2027.

Sooty grouse numbers in Southeast Alaska were reported as good in 2025 near Petersburg and Ketchikan, while potentially lower around Juneau compared to the previous year (Carroll and Spivey 2025). Hunter-harvested wing data suggest reduced juvenile production in RY24 relative to RY23, though the smaller-than-average sample size warrants caution when interpreting these results (Carroll and Spivey 2025).

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.

Rationale: If adopted, this season change may increase spring harvest, resulting in additive mortality by affecting the reproductive portion of the population. This proposal would also shift user opportunity, misaligning State and Federal regulations.

Literature Cited

Carroll, Cameron J. and Timothy J. Spivey. 2025 Alaska Small Game Summary 2025. Alaska Department of Fish and Game, Division of Wildlife Conservation. Juneau, AK.



PROPOSAL 19 – 5 AAC 85.020. Hunting seasons and bag limits for brown bears.

Extend the resident hunting season for brown bear in Unit 4 to May 31.

Current Federal Regulations:

Unit 4—Brown bear

Unit 4, Chichagof Island south and west of a line that follows the crest of the island from Rock Point (58° N lat., 136° 21' W long.) to Rodgers Point (57° 35' N lat., 135° 33' W long.) including Yakobi and other adjacent islands; Baranof Island south and west of a line that follows the crest of the island from Nismeni Point (57° 34' N lat., 135° 25' W long.) to the entrance of Gut Bay (56° 44' N lat. 134° 38' W long.) including the drainages into Gut Bay and including Kruzof and other adjacent islands—I bear every 4 regulatory years by State registration permit only

Sep. 15-Dec. 31

Mar. 15-May 31

Unit 4, remainder—I bear every 4 regulatory years by State registration permit only

Sep. 15-Dec. 31

Mar. 15-May 20

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal increases opportunity for federally qualified subsistence users hunting under State regulations. However, conservation concerns are unknown as OSM does not have enough current information for full evaluation.

Adoption of this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2027.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.

Rationale: This proposal increases opportunity for federally qualified subsistence users. However, conservation concerns and impacts on the Unit 4 brown bear population are uncertain.

PROPOSAL 20 – 5 AAC 85.020. Hunting season and bag limits for brown bears.

Extend the season for the RB088 brown bear registration hunt from May 20 to May 31, to align the season for all of Lisianski Inlet in Unit 4.

Please see comments on Proposal 19.



PROPOSAL 21 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Extend the season for the RB088 brown bear hunt in Unit 4, to align the season for all of Northeast Chichagof Island.

Please see comments on Proposal 19.

PROPOSAL 22 – 5 AAC 85.020. Hunting seasons and bag limits for brown bears.

Lengthen the hunting season for brown bear in Unit 4.

Current Federal Regulations:

Unit 4—Brown bear

Unit 4, Chichagof Island south and west of a line that follows the crest of the island from Rock Point (58° N lat., 136° 21' W long.) to Rodgers Point (57° 35' N lat., 135° 33' W long.) including Yakobi and other adjacent islands; Baranof Island south and west of a line that follows the crest of the island from Nismeni Point (57° 34' N lat., 135° 25' W long.) to the entrance of Gut Bay (56° 44' N lat. 134° 38' W long.) including the drainages into Gut Bay and including Kruzof and other adjacent islands—1 bear every 4 regulatory years by State registration permit only

Sep. 15-Dec. 31

Mar. 15-May 31

Unit 4, remainder—1 bear every 4 regulatory years by State registration permit only

Sep. 15-Dec. 31

Mar. 15-May 20

Is a similar issue being addressed by the Federal Subsistence Board? Adopting this proposal increases opportunity for federally qualified subsistence users hunting under State regulations. However, conservation concerns are unknown as OSM does not have enough current information for full evaluation.

Adoption of this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2027.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.

Rationale: This proposal increases opportunity for federally qualified subsistence users. However, conservation concerns and impacts on the Unit 4 brown bear population are uncertain.



PROPOSAL 24 – 5 AAC 92.540(1)(A). Controlled use areas.

Modify the Northeast Chichagof Controlled Use Area in Unit 4, to exclude drainages near Tenakee Inlet.

Current Federal Regulations:

§ __.26

(n)(4)(ii) In the following areas, the taking of wildlife for subsistence uses is prohibited or restricted on public lands:

(D) You may not use any motorized land vehicle for brown bear hunting in the Northeast Chichagof Controlled Use Area (NECCUA) consisting of all portions of Unit 4 on Chichagof Island north of Tenakee Inlet and east of the drainage divide from the northwestern point of Gull Cove to Port Frederick Portage, including all drainages into Port Frederick and Mud Bay.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would allow motorized vehicles to be used to harvest brown bear within areas draining into Tenakee Inlet. As this area is outside of the Hoonah road system, minimal impacts on the brown bear population or federally qualified subsistence users are expected.

However, the intent of the proponent would not be met by adopting this proposal. The proponent is focused on deer hunting regulations, while the NECCUA only applies to the use of motorized vehicles for brown bear hunting. This area is also not included in the Federal Unit 4 deer closure around Hoonah.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2027.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.

Rationale: Adopting this proposal would misalign State and Federal regulations and would minimally impact brown bear populations and federally qualified subsistence users. The proponent's intent would not be achieved.

PROPOSAL 27 – 5 AAC 85.030. Hunting seasons and bag limits for deer.

Change the bag limit for deer in Unit 1C, Douglas Island to four bucks.

Current Federal Regulations:

Unit 1C–Deer

4 deer; however, female deer may be taken only Sep. 15–Dec. 31 Aug. 1–Dec. 31.

Is a similar issue being addressed by the Federal Subsistence Board? No.



Impact to Federal subsistence users/wildlife: In Unit 1C, Federal regulations currently mirror State regulations for Douglas Island. Adoption of this proposal would not affect federally qualified subsistence users' ability to harvest deer on Federal public lands. However, it would reduce Federal users' opportunity to harvest under State regulations, although Douglas Island is a low Federal subsistence use area.

Adopting this proposal would misalign Federal and State regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2027.

This proposal would reduce the number of does harvested on Douglas Island. Protecting does would help maintain the breeding segment of the population and could promote greater population productivity. However, it would also reduce hunting opportunity for all hunters on Douglas Island under State regulations by limiting harvest to bucks only. Because most deer harvested on Douglas Island are taken by Unit 1C residents (i.e., Juneau residents), any restriction on harvest is expected to have minimal impact on federally qualified subsistence users (Churchwell 2023). Density estimates have remained stable (Churchwell 2023), and both hunting pressure and harvest have remained stable from 2018–2023 (Cross, pers. comm. 2025).

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.

Rationale: This proposal decreases opportunity for federally qualified subsistence users, although this area is not often utilized by them. With harvest and hunting pressure remaining stable, there does not appear to be a conservation concern that justifies this regulatory change.

Literature Cited

Churchwell, R. T. 2023. Deer management report and plan, Game Management Unit 1C: Report period 1 July 2016–30 June 2021, and plan period 1 July 2021–30 June 2026. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-5, Juneau.

Cross, Rob. 2025. Tongass National Forest Subsistence Program Manager. Personal communication, phone call. US Forest Service. Anchorage, AK.

PROPOSAL 28 – 5 AAC 85.030. Hunting seasons and bag limits for deer.

Change the bag limit for deer in Unit 1C, Douglas Island to two bucks.

Please see comments on Proposal 27.



PROPOSAL 29 – 5 AAC 85.030. Hunting seasons and bag limits for deer.

Require an antler restriction for bucks harvested in Unit 1C, Douglas Island to at least one forked antler on one side.

Current Federal Regulations:

Unit 1C–Deer

4 deer; however, female deer may be taken only Sep. 15–Dec. 31 Aug. 1–Dec. 31.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: In Unit 1C, Federal regulations currently mirror State regulations for Douglas Island. Adoption of this proposal would not affect federally qualified subsistence users' ability to harvest deer on Federal public lands. However, it would reduce Federal users' opportunity to harvest deer under State regulations, although Douglas Island is a low Federal subsistence use area.

Adopting this proposal would misalign Federal and State regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2027.

This proposal would restrict the age class and limit the number of deer harvested on Douglas Island, representing a unique restriction for deer hunting in Alaska. These changes would protect the breeding segment of the population and could contribute to a more stable age structure and overall population. However, they would also reduce hunting opportunities for all hunters on Douglas Island, as only older-age-class bucks could be harvested. Because most deer harvested on Douglas Island are taken by Unit 1C residents, any harvest restriction is expected to have minimal impact on federally qualified subsistence users (Churchwell 2023). Density estimates have remained stable (Churchwell 2023), and both hunting pressure and harvest levels have remained stable from 2018–2023 (Cross, pers. comm. 2025).

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.

Rationale: This proposal decreases opportunity for federally qualified subsistence users under State regulations, although this area is not often utilized by them. With harvest and hunting pressure remaining stable, there does not appear to be a conservation concern that justifies this regulatory change.

Literature Cited

Churchwell, R. T. 2023. Deer management report and plan, Game Management Unit 1C: Report period 1 July 2016–30 June 2021, and plan period 1 July 2021–30 June 2026. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-5, Juneau.

Cross, Rob. 2025. Wildlife biologist. Personal communication, phone call. US Forest Service. Anchorage, AK.



PROPOSAL 36 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

Shift the ptarmigan season in Unit 1C to start August 15 instead of August 1.

Current Federal Regulations:

Unit 1–Ptarmigan

20 per day, 40 in possession

Aug. 1–May 15.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: In Unit 1C, Federal regulations currently mirror State regulations. Adoption of this proposal would not affect federally qualified subsistence users' ability to harvest ptarmigan on Federal public lands. However, it would reduce Federal users' opportunity to harvest ptarmigan under State regulations.

Adopting this proposal would misalign Federal and State regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2027.

Because there are no breeding or brood surveys for ptarmigan in Southeast Alaska, little is known about the species' population status. Current information indicates that ptarmigan are generally observed and harvested at higher elevations in the region (Merizon and Carroll 2023).

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.

Rationale: The lack of population trend data complicates evaluation of biological status and conservation concerns. Adoption of this proposal also decreases opportunity for federally qualified subsistence users hunting under State regulations.

Literature Cited

Merizon, R. A., and C. J. Carroll. 2023. Status of grouse, ptarmigan, and hare in Alaska, 2021 and 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2023-2, Juneau.



PROPOSAL 37 – 5 AAC 85.030. Hunting seasons and bag limits for deer.

Reduce the bag limit for deer in Unit 2 from four to three bucks.

Current Federal Regulations:

Unit 2—Deer

5 deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct. 15–Jan. 31. Harvest ticket number five must be used when recording the harvest of a female deer but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five.

Federal public lands on Prince of Wales Island, excluding the southeast portion (land south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 - Aug. 15, except by Federally qualified subsistence users hunting under these regulations.

Non-federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Six wildlife proposals request changes to Federal deer harvest regulations in Unit 2. The existing closure is also being reviewed. The Federal Subsistence Board (FSB) will act on all of these proposals and closure review at their wildlife regulatory meeting in April 2026.

Wildlife Proposal WP26-03 requests closing Federal public lands in Unit 2 to deer hunting by non-federally qualified users. Wildlife Proposal WP26-04 requests conducting an ANILCA §804 subsistence user prioritization analysis for Unit 2 deer. Wildlife Proposal WP26-05 requests restricting non-federally qualified users to the harvest of one buck only in Unit 2, with the season starting for non-federally qualified users on Aug. 15. WP26-05 also requests restricting federally qualified subsistence users who do not reside on Prince of Wales (POW) to the harvest of two bucks in Unit 2, via an ANILCA §804 subsistence user prioritization analysis. All three proposals were submitted due to conservation concerns for the Unit 2 deer population, and the need to continue subsistence uses of deer among POW residents.

Additionally, Wildlife Proposals WP26-06 and WP26-07 both request eliminating the doe hunt in Unit 2. Wildlife Proposal WP26-08 requests eliminating the January season for deer in Unit 2. These three proposals were submitted due to conservation concerns.

Wildlife closure review WCR26-01 is a standard review of a Federal subsistence wildlife closure to the harvest of deer by non-federally qualified users on Federal public lands in a portion of POW in Unit 2



from Aug. 1-15. WCR26-01 also reviews the two buck harvest limit restriction for non-federally qualified users in all of Unit 2.

Impact to Federal subsistence users/wildlife: Non-federally qualified users are currently restricted to the harvest of two bucks on Federal public lands in Unit 2, due to conservation concerns for the Unit 2 deer population and the need to continue subsistence uses of these deer. Adoption of Proposals 37 or 38 would move State harvest limits in Unit 2 closer to the Federal harvest limits currently in place under this restriction for non-federally qualified users. Adoption of Proposal 39 would align State harvest limits with the Federal harvest limits currently in place for non-federally qualified users in Unit 2, reducing regulatory complexity.

Unit 2 deer populations are primarily limited by reduced quality and quantity of habitat from logging, but reducing the harvest limit would decrease harvest and competition.

Adopting Proposals 37, 38, or 39 would also reduce harvest opportunity for federally qualified subsistence users hunting under State regulations, including on corporation lands. However, federally qualified subsistence users can currently harvest five deer, one of which may be a doe, under Federal regulations on Federal public lands, which comprise 78% of Unit 2. Federal regulations concerning Unit 2 deer may change in 2026, however, depending on the outcome of the six wildlife regulatory proposals noted above.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposals 37, 38 and 39.

Rationale: Deer are the most significant terrestrial source of meat and an important source of food security for the residents of Unit 2. As the proponents of Proposals 37, 38, and 39 note, the long-term trend of declining deer habitat due to logging, wolf and black bear predation, decreasing and/or less accessible deer populations, and high hunter competition in the most road-accessible portions of Unit 2 warrants adopting measures to help conserve the deer population and ensure its use for POW residents in the future. However, these proposals reduce opportunity for federally qualified subsistence users on State-managed lands. The Federal program is also considering regulatory measures to conserve this population and ensure continuation of its subsistence use.

PROPOSAL 38 – 5 AAC 85.030. Hunting seasons and bag limits for deer.

Reduce the resident bag limit for deer in Unit 2 from four bucks to three.

Please see comments on Proposal 37.



PROPOSAL 39 – 5 AAC 85.030. Hunting seasons and bag limits for deer.

Reduce bag limit for deer in Unit 2 from four bucks to two.

Please see comments on Proposal 37.

PROPOSAL 43 – 5 AAC 85.030. Hunting seasons and bag limits for deer.

Increase the deer bag limit and extend the season length for residents and nonresidents on the Cleveland Peninsula.

NOTE: These comments only apply to the resident hunt portion of this proposal and do not apply to the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 1A–Deer

Unit 1A—4 antlered deer

Aug. 1-Dec. 31.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for federally qualified subsistence users, particularly Ketchikan residents, under State regulations. However, the Federal subsistence priority would be eliminated and competition may increase. According to the Alaska Department of Fish and Game in their submitted proposal, there is additional harvest opportunity available based on recent harvest trends. Adopting this proposal would also align State and Federal regulations, decreasing regulatory complexity.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.

Rationale: This proposal increases harvest opportunity under State regulations but eliminates the Federal subsistence priority. There are no conservation concerns.

PROPOSAL 49 - 5 AAC 84.270. Furbearer trapping.

Change the season start date for wolf trapping in Unit 2 to December 15 or January 1.

Current Federal Regulations:

Unit 2 –Wolf Trapping

No limit.

Nov. 15-Mar. 31.



Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the trapper for each wolf, and all hides must be sealed within 15 days of take.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Two current wildlife proposals request changes to harvest regulations for wolves in Unit 2. The Federal Subsistence Board (FSB) will act on both of these proposals at their wildlife regulatory meeting in April 2026.

Wildlife proposal WP26-09 requests to move the start date for wolf trapping in Unit 2 from November 15th to December 15th. Wildlife Proposal WP26-10 requests to establish a guaranteed 47-day wolf trapping season by changing the end date for wolf trapping in Unit 2 from March 31st to December 31st.

Impact to Federal subsistence users/wildlife: If this proposal is adopted, the wolf trapping season would start 1-1.5 months later. This may decrease conflicts with other user groups, including deer hunters, waterfowl hunters, and biologists as well as black bears as detailed by the proponent in their submitted proposal. Moving the season opener to December 15th may improve wolf population estimates by reducing the overlap of the trapping seasons with hair-board data collection.

Historically, most wolf harvest in Unit 2 occurred in January and February when pelts are the most prime but have recently occurred in December due to seasons closing early. Moving the start date to December may benefit subsistence users by decreasing conflicts and interference from others and allowing trapping when wolf pelts are in better condition. However, it could also reduce opportunity if trapping areas are less accessible due to poor weather conditions later in the season. Ultimately, this proposal reduces subsistence opportunity by shortening a potential 4.5-month trapping season to only 3-3.5 months.

Impacts on the wolf population are uncertain but expected to be minimal as managers would continue to adjust season lengths to maintain the wolf population within the population objective range. Current harvest rates have supported 31-day seasons. Shifting the season later may affect daily catch rates, resulting in announced seasons to be longer or shorter.

Adoption of this proposal may result in alignment or misalignment with Federal regulations depending on FSB action on WP26-09, impacting regulatory complexity and, potentially, law enforcement.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 49.

Rationale: This proposal decreases subsistence opportunity by shortening a potential 4.5-month trapping season by at least one month. ADF&G has the authority to set the State trapping season start date each year, so the intent of this proposal could be achieved through in-season management without reducing potential opportunity in codified regulation.

While seasons have recently opened on November 15th, OSM encourages Federal and State managers to consider shifting the season opening date later in the season to address the concerns of the proponent of this proposal. Additionally, OSM encourages managers to strongly consider traditional ecological knowledge (TEK) and local subsistence users' knowledge when setting season lengths and opening dates each year.



PROPOSAL 50 - 5 AAC 84.270. Furbearer trapping.

Move the start date of the wolf trapping season in Unit 2 to December 15.

Please see comments for Proposal 49.

PROPOSAL 51 - 5 AAC 84.270. Furbearer trapping.

Extend the wolf trapping season to 45 days on Prince of Wales Island, Unit 2.

Current Federal Regulations:

Unit 2 –Wolf Trapping

No limit.

Nov. 15-Mar. 31.

Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the trapper for each wolf, and all hides must be sealed within 15 days of take.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Two current wildlife proposals request changes to harvest regulations for wolves in Unit 2. The Federal Subsistence Board (FSB) will act on these proposals at their wildlife regulatory meeting in April 2026.

Wildlife proposal WP26-09 requests to move the start date for wolf trapping in Unit 2 from November 15th to December 15th. Wildlife Proposal WP26-10 requests to establish a guaranteed 47-day wolf trapping season by changing the end date for wolf trapping in Unit 2 from March 31st to December 31st.

Impact to Federal subsistence users/wildlife: While this proposal requests a guaranteed 45-day wolf trapping season in Unit 2, OSM assumes the intended season dates would be Nov. 15-Dec. 31 as this would align with requested dates in Federal proposal WP26-10. Establishing a consistent season would allow subsistence users to better predict and plan trapping opportunities. Increasing the season to 45-days would result in 14 more days of harvest opportunity over the recent 31-day announced seasons. At the estimated harvest rate of 2.4 wolves per day, this would increase harvest by 34 wolves. However, this proposal ultimately reduces subsistence opportunity by shortening a potential 4.5-month trapping season to only 1.5 months.

This proposal is inconsistent with the current harvest management strategy, which adjusts season lengths annually based on wolf population estimates. A guaranteed 45-day season may therefore result in unsustainable wolf harvest if estimates are low, reducing subsistence opportunity in the long-run; or could result in decreased subsistence opportunity and undersubscribed harvests if estimates are high.

Adoption of this proposal may result in alignment or misalignment with Federal regulations depending on FSB action on WP26-09, impacting regulatory complexity and potentially, law enforcement.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 51.



Rationale: This proposal is inconsistent with the current harvest management strategy, which could impact the sustainability of this high-profile wolf population. ADF&G sets the State season length each year based on wolf population estimates, so the intent of this proposal could be achieved through in-season management without reducing potential opportunity in codified regulation.

OSM encourages Federal and State managers to consider setting season lengths in accordance to those prescribed by the current harvest management strategy. Additionally, OSM encourages managers to strongly consider traditional ecological knowledge (TEK) and local subsistence users' knowledge when setting season lengths each year.

PROPOSAL 54 – 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

Require identification tags be attached to traps and snares in Unit 2.

Current Federal Regulations: None.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: This proposal would increase the burden on federally qualified subsistence users trapping under State regulations. Users would have to buy tags, attach them to traps, change-out tags if borrowing equipment from others, and ensure tags remain attached to traps in the field throughout the season, representing substantial increases in the time, money, and effort required to trap under State regulations in Unit 2.

Although adoption of the proposal could allow law enforcement to more easily identify trappers that have traps deployed outside the open season or have otherwise violated regulations, mandatory trap marking does not necessarily prevent illegal trapping activity or prevent dogs from getting trapped. Also, adoption of this proposal will not affect Federal regulations, which would allow federally qualified subsistence users to operate traps on Federal public lands under Federal regulations to avoid this requirement. No impacts to wildlife populations are expected from this proposal.

Requiring identification tags on traps and snares has been a reoccurring regulatory request. Traps were required to be marked under State regulations in Units 1-5 from 2006-2016 and under Federal regulations from 2012-2018. This requirement was implemented due to incidences of illegal trap placements, pets being caught in traps, and incidental catches by unattended snares after trapping seasons had closed. However, this requirement was subsequently rescinded because it was not effectively addressing the reasons why it was originally implemented. Specifically, marking traps did not prevent illegal trapping activity or pets from getting trapped. In 2019, the BOG rejected Proposals 13 and 14 to require identification tags for traps and snares in the Southeast Region. In 2020, the Federal Subsistence Board rejected Proposal WP20-08, requesting a statewide requirement to mark traps and snares. This proposal was unanimously opposed by all ten Regional Advisory Councils (OSM 2020).



Adoption of this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2027.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: Requiring Federally qualified subsistence users to mark traps is an unnecessary burden. Although adoption of the proposal could allow law enforcement to more easily identify trappers that have traps deployed outside the open season or have otherwise violated regulations, mandatory trap marking does not necessarily prevent illegal trapping activity or pets getting caught. Alignment of Federal regulations is necessary for this request to be effectively implemented.

Literature Cited

OSM. 2020. Staff analysis WP20-08. Pages 88–104 *in* Federal Subsistence Board Meeting Materials: Volume I. April 20 - 23, 2020. Office of Subsistence Management, FWS. Anchorage, AK. 574 pp.

PROPOSAL 64 – 5 AAC 92.150. Evidence of sex and identity.

Eliminate the regulation that excludes broken, damaged, or altered antlers from the definition of spike-fork antlers for Units 1B, 1C and 3.

Current Federal Regulations:

§__.25(a) Definitions. The following definitions apply to all regulations contained in this part:

Spike-fork moose means a bull moose with only one or two tines on either antler; male calves are not spike-fork bulls.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal is not expected to substantially impact federally qualified subsistence users or moose populations. Federal regulations do not contain this additional provision for spike-fork antlers in Units 1B, 1C, and 3. However, when Federal hunts require State permits, federally qualified subsistence users must comply with the provisions of the State permit.

Adopting this proposal may result in some increase in moose harvest and law enforcement concerns as unethical hunters could harvest an illegal bull and then alter its antlers after harvest to make it legal. Law enforcement officers would need to distinguish between broken and altered antlers. Eliminating this provision under State regulations would increase alignment with Federal regulations, reducing regulatory complexity.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.



Rationale: This proposal is not expected to substantially impact users or the moose population and would decrease regulatory complexity by aligning with Federal regulations, but it may create additional law enforcement concerns.

PROPOSAL 65 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

Remove the antler restriction for the moose hunt in Units 1B and 3 and replace with a shorter, any bull hunt in October.

Current Federal Regulations:

Unit 1B–Moose

*Unit 1B—1 antlered bull with spike-fork or 50-inch antlers or 3 or more Sep. 15-Oct. 15.
brow tines on one side, or antlers with 2 brow tines on both sides, by
State registration permit only*

Unit 3–Moose

*Unit 3—1 antlered bull with spike-fork or 50-inch antlers or 3 or more Sep. 1-Oct. 15.
brow tines on either antler, or antlers with 2 brow tines on both sides by
State registration permit only*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal would decrease the number of days federally qualified subsistence users could hunt moose in Units 1B and 3 under State regulations, but it may improve harvest success through a more liberal harvest limit. However, a shorter season would also concentrate effort and increase competition. Antler restrictions are typically implemented to maintain hunting opportunity and sustainable harvests. Despite the shorter season, adopting this proposal may result in conservation concerns.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2027.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.

Rationale: This proposal decreases hunting time for federally qualified subsistence users under State regulations, but it may increase their harvest success. OSM did not fully analyze impacts on the moose population, but conservation concerns are possible.



PROPOSAL 69 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

Extend the grouse hunting season in Unit 3, to close June 15 instead of May 15.

Current Federal Regulations:

Unit 3–Grouse

5 per day, 10 in possession

Aug. 1–May 15.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: In Unit 3, Federal regulations currently mirror State regulations. Adoption of this proposal would not affect federally qualified subsistence users' ability to harvest grouse on Federal public lands. However, it would increase Federal users' opportunity to harvest grouse under State regulations.

Adopting the proposal would misalign Federal and State regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2027.

Impacts to the grouse population are possible. If adopted, this season change may increase spring harvest, resulting in additive mortality. This additive mortality would primarily affect the breeding portion of the population. Additionally, the ease of locating calling grouse in spring could lead to elevated harvest rates and disproportionate removal of breeding individuals, potentially affecting overall population productivity. However, spring breeding surveys conducted in the Petersburg area indicate that sooty grouse numbers in 2025 are similar to those observed in 2024 (Carroll and Spivey 2025). Hunters are expected to encounter good numbers of sooty grouse in the area this year (Carroll and Spivey 2025).

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.

Rationale: This proposal increases hunting opportunity for federally qualified subsistence users under State regulations, although conservation concerns are uncertain.

Literature Cited

Carroll, Cameron J. and Timothy J. Spivey. 2025 Alaska Small Game Summary 2025. Alaska Department of Fish and Game, Division of Wildlife Conservation. Juneau, AK.



PROPOSAL 272 - 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

Remove conflicting and redundant methods and means for taking beavers during trapping seasons across the state.

Current Federal Regulations:

§__.26

(d) Trapping furbearing animals. The following methods and means of trapping furbearers for subsistence uses pursuant to the requirements of a trapping license are prohibited, in addition to the prohibitions listed at paragraph (b) of this section:

(3) Taking beaver by any means other than a steel trap or snare, except that you may use firearms in certain Units with established seasons as identified in Unit-specific regulations found in this subpart;

The units allowing take of beaver by firearm under a trapping license in Federal regulations include Units 9B (Apr. 1-May 31); Unit 9 remainder (Apr. 1-30); Unit 17 (Apr. 15-May 31); Unit 18 (Apr. 1-Jun. 10); Unit 21E (Nov. 1-Jun. 10); Unit 22 (during established seasons); and Unit 23 (Nov. 1-Jun. 10).

Is a similar issue being addressed by the Federal Subsistence Board? No; however, several current Federal regulatory proposals may be indirectly impacted by this State regulatory change. The Federal Subsistence Board (FSB) will act on these proposals at their wildlife regulatory meeting in April 2026.

Proposal WP26-37 requests to remove the firearm restrictions for beaver trapping in Units 9 and 17. This proposal was submitted in response to the Alaska Board of Game's (BOG) adoption of Proposal 21 and 37 last cycle.

Proposal WP26-16 requests to increase the possession limit and to extend the season dates for beaver hunting in Unit 6 to year-round.

Impact to Federal subsistence users/wildlife: This proposal would decrease opportunity for federally qualified subsistence users trapping beaver under State regulations, but it would correct a seeming error in regulation. OSM did not evaluate impacts to beaver populations but expect them to be extremely minimal. Adopting this proposal would also more closely align State and Federal regulations, decreasing regulatory complexity.

Last cycle, the BOG adopted Proposals 21 and 37 at the Central/Southwest Region meeting. ADF&G submitted both proposals, which requested to remove the harvest limit restrictions for beaver when taken by firearm with a trapping license in Units 9 and 17, respectively. ADF&G's comments on Proposals 21 and 37 state, "The current bag limit by firearm is unnecessarily restrictive and conflicts with the regulation in 5 AAC 92.095 that allows the use of firearms for all trapping seasons and bag limits" (ADF&G 2025).

If the statewide allowance of take of beaver by firearm with a trapping license is eliminated under State regulations, OSM encourages the BOG to re-instate the unit-specific allowances for Units 9 and 17 as



these restrictions were eliminated last cycle because they seemed unnecessary due to the statewide allowance.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.

Rationale: This proposal decreases opportunity for federally qualified subsistence users trapping under State regulations, but it corrects a seeming error in regulation. OSM did not evaluate impacts on beaver populations. If adopted, OSM supports re-instating the firearm allowances in Units 9 and 17.

Literature Cited

ADF&G. 2025. Alaska Department of Fish and Game Staff Comments for Proposals 1-23, 25-27, 29-38, 45-46, 51-54, 64-67, 70-79, and 81-84. Central / Southwest Region Proposals. Alaska Board of Game Meeting. Wasilla, Alaska. January 10-17, 2025. https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2024-2025/csw/dfg_comments-11.07.2024.pdf. Accessed December 9, 2025.



Name: Jarred Olson

Community of Residence: Petersburg

Comment:

I hope you take an account what people say but also listen to the science and what is best for the resource, but also be fair for the opportunity to take game.

Proposal 1: Oppose

I've been huntbig since I could pick up a rifle and the game are most active the first half hour before it gets really light and the half hour before it gets dark so long as I can see it has horns I should be able to shoot it. It's already illegal to take game between Sunset and sunrise with artificial light. There's no reason to even think about this one. It's just dumb to put shooting hours. Sounds like a poaching problem to me what this law won't do a thing. Sounds like you need to have your troopers do a better job.

Proposal 2: Oppose

It is already illegal to take game between sunset and sunrise with artificial light. I don't know what the agenda is for this, but it sounds like there's more of a poaching problem rather than people being legal and if I can see a deer and that it has antlers in early twilight and evening twilight I should be able to shoot it regardless if there is Shooting hours, I hunt for food, not horns

Proposal 3: Oppose

Would make it to easy to have out of state hunters to come up and take goats and close areas down before residents. It's just cheating and not fair to the resource. They wouldn't stand a chance.

Proposal 5: Support

Need predator numbers to be brought down to a manageable population allow those that hunt bears more often to do it every year because not all of us have the time to bear hunt

Proposal 6: Support

Why not not like you'll see that many more harvested

Proposal 8: Support

They are a non-native predator. We don't need a new predator on the landscape. And if a cougar gets shot, it is so rare and far in between it's not going to have any repercussions whatsoever.

Proposal 9: Support

Don't need a new predator on the landscape. We have enough already.

Proposal 11: Support

I think it would be nice to know if it is more urgent to go. Check your traps sooner.

Proposal 16: Support

Why not

Proposal 17: Support

I support it so long as I can add more to the big limit. There is a surplus of grouse.

Proposal 18: Support

Why not

Proposal 23: Oppose

Nonresidence get enough already.

Proposal 26: Support Seems smart.

Proposal 27: Oppose

There's not enough, dear.

Proposal 28: Oppose

Not enough, dear.

Proposal 29: Support

Stop shooting small/young deer is always a smart idea.

Proposal 30: Support

So long as it's for all residents, rural and non-rural

Proposal 35: Support

Why not?

Proposal 37: Support

May help their deer numbers

Proposal 38: Support

Might be a good thing.

Proposal 39: Support

Let the deer numbers come back with still getting opportunity.

Proposal 42: Oppose

If you do this, you better take away the two weeks early season for residents in July I'm from Petersburg and I still think that is retarded

Proposal 57: Oppose

I think the Elon Rambo still needs to be regulated a few more years before we open it up.

Proposal 58: Oppose

Not quite enough elk yet.

Proposal 59: Support

I don't think nonresidence should have a go at elk on Zarembo. I think it is a small enough herd residence should only be allowed.

Proposal 64: Oppose

There's a reason why we have this rule too many people breaking tines off to make moose legal. There has been some I would say get taken from hunters because of horn defects. I think the rule needs to have better clarifications where it's a broken Or altered horn. And not have damaged in the rule sometimes they have defects from hitting a tree and velvet. Maybe even have it say a non-natural damaged antler.

Proposal 65: Oppose

That makes it so hard for people that have to work all week and have a family and hope to get a few days to hunt during the current season. Having a shorter season and any bull there would be so many people hunting during the weekdays shooting all the moose until there are emergency closures. It is a bad idea all around you would get so many people coming into unit three and 1B wiping out the resource That I rely on for food. I am fortunate enough that if I worked hard and hike away from the road far enough I typically get a moose every other year and sometimes every year if you think it's hard to find a moose now go one-four years with this regulation and that won't be any left. Keep the season as it is but have the draw for any bull come back say five tags per unit. That would be a good compromise. I think.

Proposal 66: Support

We need more predator control incentives.

Proposal 67: Support

Gives more opportunity.

Proposal 68: Support

Gives more opportunity for the resource.

Proposal 69: Support

Most of the time you can't get to the grouse via road systems until after May 15 there are so many grouse. You can still hear them calling all the way into August.

**PC66**

Name: Nicholas Orr

Community of Residence: Juneau

Comment:

Proposal 10: Support

As the proposal says, sealing requirements are generally for high value animals or those with population concerns. Beavers meet neither of criteria. Sealing creates an administrative burden on trappers for no reason.

Proposal 11: Support

This proposal allows for trappers to minimize the time animals spend in traps as well as provide a deterrent for those who would impede lawful trapping. I understand that law enforcement has said that cellular game cameras could be used in hunting, but in SE the only big game animals that are in season during trapping season are deer, which already allow for same day fly and shoot. Furthermore, during a portion of this time period bucks are rutting (November), which means they are moving a lot and will likely not be near a camera which transmits their picture by the time a person is able to go to that location. In December, they are starting to lose their antlers, further diminishing the utility of a cellular connected game camera.

Proposal 15: Support

Since fisher are taken as bycatch while targeting marten, removing the limit allows the department to get real time information in the event the population spikes. Furthermore, removing the limit will have no negative impact on the fisher population as t

Proposal 23: Support with Amendment

Support with amendment to limit non-resident take to 4 deer, bucks only.

I strongly support this ADFG proposal on the grounds that it is common sense proposal supported by scientific data indicating that populations can withstand a return to the original non-resident bag limit. I understand that the original proposal was a good faith effort to appease Southeast Rural Advisory Committee (SE RAC) / Federal Subsistence Board (FSB) during their deliberations on whether to close portions of Unit 4 to deer hunting. Given the SE RAC / FSB ignored the 2023 non-resident bag limit reduction and subsequently closed portions of Unit 4, I feel ADFG's current proposal is appropriate. I attended all the SE RAC & FSB meetings, and aside from Ryan Beason (president of Territorial Sportsmen Inc), I remember no other consistent advocate for resident hunting rights except for the Alaska Dept of Fish and Game. Given their consistent and unfailing support for resident hunting rights in front of the SE RAC/ FSB, I support this proposal as I understand it was made solely as a bargaining tactic in an attempt to preserve resident hunting rights.

I am aware there is some concern that a higher bag limit will spark a rapid increase in transporters. This is coming mainly from the guides, who view the 2 deer bag limit as a way to potentially monopolize commercial hunting activity. Curiously, a number of guides who are strong supporters of keeping this bag limit at 2 were also adamant opponents of the move to raise the resident bag limit to 6 deer on the grounds that "the 4 deer bag limit has always worked." But apparently, that same logic doesn't apply to non-residents? Let me be the first to say: if such an increase in transporters were to occur, I would be the first and loudest to advocate for non-resident bag limit reduction. However, I feel such an increase in transporters is unlikely given the factors that ADFG notes in their proposal: difficulty in access and lack of trophy animals.

**PC67**

Name: Bruce Parker

Community of Residence: Sitka

Comment:

Proposal 4: Support

Keeps multiple probable harvests/deaths from happening from the same hunter for that certain species. Wise use of the resource while maintaining opportunities for all.

Proposal 5: General Comment

This could likely quickly turn into overharvest and depleting the quality of hunting and resource now enjoyed in this area. No one really needs a Brown Bear every year.

Proposal 6: Support

Good for everyone

Proposal 8: Support

If specie is not wanted here, obviously need to have a season to make them legal to take.

Proposal 19: Oppose

Likely to be an increased harvest level that may or could go over the desired harvest levels in certain areas, which is why it is the way it is now. Nothing is broken here, so no fix is needed.

Proposal 20: Oppose

Same comment as I made on Prop.19

Proposal 21: Oppose

Same as prop 19 & 20

Proposal 22: General_Comment

Would increase harvest levels substantially and likely increase boar / male harvests. Would likely if passed - along with any spring hunts, RB088 longer seasons in the above props, would certainly cause over-harvest concerns in certain GUA's where is now quite sustainable harvests already not too far from the desired amount. Either this prop or the spring prop is likely doable, but passing them both would be a concerning issue.

Proposal 25: Support

Yes, make it clear what's what and where so easy to determine.

Proposal 26: General_Comment

While Nanny harvest is a concern and issue for all Goat Hunters, as an author of this proposal. I would suggest my desire to table it as written, as it has come to light that there are other user groups that would like input and have an impact in this as well, and this may not be the best approach for all considered as is. Feel free to amend and or use or table as you see fit.

Name: Bruce Parker, Parker Guide Service Inc.

Community of Residence: Sitka

Comment:

Proposal 3: Oppose

This is a horrible idea and will negatively impact certain populations as well as promote unethical non fair chase hunting. To degrade a majestic animal's status/hunt to equal drive by harvests. Nothing positive about this prop! it will promote more and other type of unethical hunts



PC68

**PC69**

Name: Patricia Phillips

Community of Residence: Pelican

Comment:

Proposal 52: Support

Add Unit 2 as an area for intensive management of wolves.

Dual objectives: Protect the wolf population from depletion and increase harvest in some areas, This is to keep wolf populations at manageable levels and allow for genetic diversity.

Currently the wolf harvest is a derby style harvest, it gets hit all at once and with random areas of harvest. Intensive management would put a focus on areas where wolf harvest can be increased, and/or a longer harvest period allowed, specifically on state managed land areas.

The management of wolves on Unit 2 would continue to tap into the stakeholder driven coordination efforts already in place: biologists meet with community members, harvesters, and tribes.

1994 "Intensive Management Law" designates areas where human consumptive use is the highest priority use of wildlife.

- Liberalize hunting and trapping regulations for wolves on state lands on Unit 2/POW
- Implement habitat improvement projects – thinning and wildlife corridors.

ADFG biologist compares POW wolves with Isle royale wolves – Isle Royale is 45 miles long by 9 miles wide, with an area of 206.73 square miles. Prince of Wales Island is 135 miles long by 65 miles wide, with an area of 2,577 square miles. Prince of Wales Island is nearly 10 times larger than Isle Royale.

Additionally, the Parvovirus outbreak in the 1980's decimated the wolf population on Isle Royale, lowering numbers and making remaining wolves vulnerable to inbreeding. The high extents of inbreeding indicated on POW may not be indicative of inbreeding depression.

**PC70**

Name: Benjamin Pinney

Community of Residence: Juneau

Comment:

Proposal 1: Oppose

There aren't real issues with spotlighting animals other than deer throughout southeast so this proposal may extend beyond what is necessary to stop the issues of using lights to shoot deer off of roads.

Proposal 2: Support

I understand the concern with shutting a light off right before shooting a deer. This is unethical and should be illegal

Proposal 3: Oppose

Same day airborne taking of goats is no different than sheep or other animals. It would only result in quotas being filled quicker and less opportunity for all.

Proposal 4: Oppose

There are many times where blood drawn does not mean a dead goat. Goats survive avalanches, puncture wounds from other goats and animals, etc. this is a gray area.

Proposal 5: Support

There seems to be plenty of brown bears and I have personally witnessed more brown bear activity in these areas resulting in decreased black bear activity

Proposal 17: Support

I would support a decreased bag limit if necessary. I have never shot a limit of grouse and feel the current limits may contribute to over harvest in more popular hunting areas.

Proposal 26: Support with Amendment

I understand mountain goat ecology and have done a significant amount of reading on the subject. Nannies start getting pregnant at year 3 or 4 and then only every other year. They anls have very small mountain home ranges. Avoiding shooting Nannies is vital to maintaining a healthy goat population especially in popular areas. This proposal is long overdue.

Proposal 31: Support

I have seen brown bear numbers seeming to increase in the 1c area with decreasing black bear numbers.

Proposal 34: Oppose

Strongly oppose. I am a Juneau resident and longtime archery hunter. I am a bowhunter education instructor. I don't think this would gain anything but the potential for a sore eye with the general non hunting public with risk of trespassing, wounded animals dying on private property etc, there is more than ample opportunity to hunt outside of the closed area. All one needs to do is strap on their boots and go for a hike!

Proposal 35: Oppose

Same as proposal 34. We don't need to hunt in yards.

Proposal 47: Oppose

No reason to not keep good spring meat.

Proposal 63: Oppose

I oppose adjusting any archery dates. Archers need longer seasons to find success. Adding a drawing other than archery would increase success and potentially decrease tag numbers in the future which would further take away archery opportunity.



Name: Tyler Reid

Community of Residence: Petersburg

Comment:

Proposal 1: Support

Spotlighting and the use of headlights has always been an issue. It has always been illegal, why is this a proposal?

Proposal 2: Support

Spotlighting and the use of headlights has always been an issue. It has always been illegal, why is this a proposal?

Proposal 12: Support

Promoting or allowing the use of nightvision technology is only going to open the door to poaching other game. Once the technology is obtained, be it a nightvision optic or a scope it is like anything else, some will use it as intended and some will not.

Proposal 13: Support

Same as stated on proposal 12

Proposal 23: Oppose

We need to be very careful giving such a precious resource away to non residents when the people of the area depend so heavily on the resource. Higher bag limits will increase traffic. This sounds like a money grab, more attention = more tags sold. I dont think this is a good idea for any unit in Southeast. I live in the Petersburg area and non resident hunters and resident but (non local) hunters are becoming a nuisance. Renting cabins for weeks on end and shooting as many deer as they can. Its getting harder and harder for my family to fill our freezer. Why invite more?

Proposal 26: Support

Shooting nanny goats is the fastest way to crush a population. There should be more than just a slap on the wrist for people shooting them year after year

Proposal 40: Support

Support this proposal because it will bring less pressure from outside into the area. It is less appealing to fly to an area with a lower bag limit.

Proposal 41: Support

All non residents should be limited to 1 buck regardless of unit

Proposal 47: Support

Black bears are the number one predator of deer. I believe one of the biggest reasons people dont hunt bear is that they do not want bear meat. Get more people buying bear tags and dont worry about the meat salvage. Basic predator control.

Proposal 58: Oppose

There is too much pressure on zerembo island as it is. This would last for a handful of years and look great, but after that we would never see elk on zerembo island again.

Proposal 65: Oppose

I am an avid moose hunter in unit 3, some years feeling like this proposal would be a great change. Other years i feel this may decimate the moose population in our area. It also will shorten our season very significantly. This is not a good thing because locals may lose their opportunity to hunt all together. If a "quota" system is put in place there could easily be 100 bulls killed in a 4 day weekend, season over. As it stands, a guy has a chance to get out 4 to 5 weekends a year and can go make it happen. An any bull open registration will also gather unneeded attention from out of state and non local hunters looking to add pressure to our already over pressured hunt. I also fear if this change is put into play, hunters will be shooting the wrong age group of bulls which could prove to be very bad for the overall population of moose. What about bringing back the "locals only" 20 any bull tags draw/lottery? Shoot a couple big single browline bulls leave the rest of the in-between bulls alone. Our current regs have proven to be effective, moose population is as good as ever.

**RESIDENT HUNTERS OF ALASKA**unapologetically **FOR ALASKAN RESIDENTS**

Working hard to ensure our wildlife is managed sustainably with an emphasis on protecting and enhancing resident hunting opportunities!

www.residenthuntersofalaska.org**Resident Hunters of Alaska (RHAK)****Comments to Alaska Board of Game – Southeast Region Meeting****January 23-27, 2026****Proposals we support: 4,6,7,8,9,19,40-41, 59-62****Proposals we support as amended: 5,20-22,31-33,44-46****Proposals we oppose: 3,12-13,23,27-28,37-39,55-56,66****General Comments****Proposals to Extend Brown Bear Hunt Areas and Seasons
(Proposals 19,20,21,22,31,32)**

There are several proposals to extend brown bear hunting seasons and expand hunt areas. RHAK supports extending seasons and hunt areas *for resident hunters* when there are no bear conservation concerns, but we generally *do not support them for nonresident guided bear hunters*. We have seen how the competition between guided nonresident bear hunters and resident bear hunters can lead to conflicts and crowding in the field. It's past time for the Board of Game to consider some resident-only brown bear seasons and/or expansion of the hunt area in these areas for residents only where there are no bear conservation concerns. This takes nothing away from the current nonresident seasons or hunt areas and would allow residents a time and place to hunt without the guided nonresident presence and competition.

**Proposals to Increase Brown Bear Bag Limit
(Proposals 5,31,32,33)**

Regarding proposals to increase the brown bear bag limit from one bear every four years to one bear every year, RHAK supports a bag limit change for residents when there are no bear conservation concerns. RHAK *opposes* any increased bag limit *for nonresident guided hunters* in these areas. There is too much potential in these areas where there is no real population estimate or in-season management for the commercial harvests to increase beyond allowable harvest.



Proposals to Decrease Deer Bag Limits

(Proposals 27, 28, 37-41)

When and where there are deer conservation concerns, or other reasons for proposals to decrease deer bag limits, if the nonresident bag limit is the same as the resident bag limit, the nonresident bag limit should always be the first to be reduced.

Draw Hunt Allocation Proposals

(Proposals 44-46, 59-62)

RHAK continues to advocate for a statewide 90/10% resident/nonresident draw tag allocation for all draw permits, where a minimum of 90 percent of the permits go to residents and “up to” 10 percent go to nonresidents. ***Residents should have a clear and substantial preference for all draw permits.*** When very few draw permits (less than 10) are available under an “up to” 10% allocation to nonresidents, there should be no nonresident opportunity.

Below are our comments on individual proposals.

PROPOSAL 3 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions.

Allow the same day airborne take of goats in Units 1-5

OPPOSE

The argument this proposal makes in support of allowing same-day-airborne (SDA) hunting of goats is about taking advantage of good weather and increasing the odds of a shorter, safer, less expensive hunt. This same argument could apply to any hunt anywhere in Alaska.

As the Department comments state, *“with few exceptions, the take of big game the same day a hunter has been airborne has been prohibited for more than 50 years.”* We see no reason to change the current prohibition of SDA take of mtn goats Units 1-5. The Department further states that *“adoption of this proposal has the potential to greatly reduce season length in many areas due to goats being harvested much more quickly than under the current management structure.”*

RHAK **opposes** the SDA take of mountain goats in Units 1-5.

PROPOSAL 4 – 5 AAC 92.130. Restrictions to bag limits

Amend the definition of a "taken" mountain goat in Units 1-5 to align with the definition of a "taken" brown bear in Units 1-5

SUPPORT



A wounded, unrecovered animal should mean you cut your tag and are done hunting.

PROPOSAL 5 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Increase the brown bear bag limit in Unit 1 Remainder, to one bear every regulatory year instead of one bear every four regulatory years

SUPPORT as Amended to ONLY include residents

RHAK supports increasing the brown bear bag limit to one bear every regulatory year for residents when there are no bear conservation concerns. Typically, most residents will not take advantage of that added opportunity. However, we have concerns with increasing the nonresident brown bear bag limit to one bear every year as commercial harvests may increase and with no in-season management there is no way of controlling any potential overharvests.

PROPOSAL 6 – 5 AAC 85.056. Hunting seasons and bag limits for wolf.

Align the wolf hunting seasons in Unit 1 by extending the seasons for Units 1B, 1C and 1D to May 31

SUPPORT

Wolf harvest will not increase much if this proposal is adopted; there are no conservation or biological concerns.

PROPOSAL 7

5 AAC 85.056. Hunting seasons and bag limits for wolf.

Align the wolf hunting seasons in Unit 1 by extending the seasons in Units 1A, 1B and 1C to May 31

SUPPORT

See our comments on Proposal 6.

PROPOSALS 8 & 9 – 5 AAC 85.XXX. Seasons and bag limits for cougars/mountain lion.

Establish an open season for cougar in the Southeast Region

5 AAC 84.270. Furbearer trapping.

Establish hunting and trapping regulations for taking mountain lion in the Southeast Region

SUPPORT



Currently it's illegal to take a mountain lion in Alaska, and if one is caught in a trap it's not legal to keep. At least allow a hunter or trapper the opportunity to take and keep a mountain lion if that species migrates into Alaska.

PROPOSAL 11 – 5 AAC 92.080. Unlawful methods of taking game; exceptions.

Allow the use of cameras or other sensory devices that can send messages through wireless communication for trapping furbearers in Units 1-5

Defer to Statewide meeting

PROPOSAL 12 – 5 AAC 92.080. Unlawful methods of taking game; exceptions.

Prohibit the use of night vision devices for taking furbearers in Units 1-5

OPPOSE

The use of night vision devices for taking furbearers is currently allowed statewide under a trapping license. The rationale of this proposal is that Units 1-5 are more densely forested than the rest of the state and allowing the use of night vision devices in those units will lead to the illegal take of non-furbearer species and create enforcement issues. Wherever the use of night vision devices is allowed to take furbearers, there is a potential for someone to illegally take big game using that equipment. That isn't justification, though, to prohibit the use of night vision devices.

PROPOSAL 13 – 5 AAC 92.080. Unlawful methods of taking game; exceptions.

Prohibit the use of night vision for taking furbearers in Units 1-5, during state and federal deer seasons

OPPOSE

See our comments on proposal 12.

PROPOSAL 19 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Extend the resident hunting season for brown bear in Unit 4 to May 31

SUPPORT

Allowing resident bear hunters to have the latter part of May as a resident-only season poses no conservation concerns and avoids competition with nonresident guided hunters.

PROPOSAL 20 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.



Extend the season for the RB088 brown bear registration hunt from May 20 to May 31, to align the season for all of Lisianski Inlet in Unit 4

SUPPORT AS AMENDED to only include residents

We support this proposal if it ***only*** includes resident bear hunters. We oppose this proposal as written to include nonresident bear hunters. Wherever possible and if there are no conservation concerns, allowing for a partial resident-only brown bear season keeps crowding and conflicts with guided nonresident hunters at bay.

PROPOSAL 21 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Extend the season for the RB088 brown bear hunt in Unit 4, to align the season for all of Northeast Chichagof Island

SUPPORT as Amended to only include residents

See our comments on proposal 20.

PROPOSAL 22 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Lengthen the hunting season for brown bear in Unit 4

SUPPORT as Amended to only include residents

See our comments on proposal 20.

PROPOSAL 23 – 5 AAC 85.030. Hunting seasons and bag limits for deer.

Increase the nonresident bag limit for deer in Unit 4

OPPOSE

This is a Department proposal that is unnecessary and will not lead to any real increase in nonresident deer harvests if passed.

We continue to be disappointed in the Department’s ostensible policy to remain “neutral” on all allocation proposals that ask to limit nonresident hunters when game populations are extremely low, yet the Department continues to submit proposals asking to increase nonresident hunting allocations and opportunities when they deem game populations are high.

PROPOSAL 24 — 5 AAC 92.540(1)(A). Controlled use areas.

Modify the Northeast Chichagof Controlled Use Area in Unit 4, to exclude drainages near Tenakee Inlet



SUPPORT

The drainages flowing into the north shore of Tenakee Inlet should never have been included in the Northeast Chichagof Controlled Use Area designed for conservation of the deer population and to avoid crowding and competition along the Hoonah road system.

PROPOSAL 26 -- 5 AAC 85.040. Hunting seasons and bag limits for goat.

Restrict hunters who take nanny goat in Unit 1C from hunting goat in Unit 1C for the following four regulatory years, and require nonresidents to forfeit nanny goats taken

SUPPORT

There needs to be clear penalties for taking a nanny goat in areas where we don't want them harvested. In areas where goats are managed via draw hunts under a point system (billy = 1 point, nanny = 2 points), we would like to see the same consistent regulations, whether it be a four-year no-hunting penalty or a five-year penalty.

While resident hunters clearly take more nannies than nonresident guided hunters, since most nonresident goat hunters will likely not return to Alaska to hunt goat again, there needs to be some kind of penalty for nonresident hunters to encourage the guides to avoid taking nannies.

PROPOSAL 27 -- 5 AAC 85.030. Hunting seasons and bag limits for deer.

Change the bag limit for deer in Unit 1C, Douglas Island to four bucks

OPPOSE

This is an unnecessary bag limit change as there are no conservation concerns for deer in Unit 1C with the continued allowance to take one doe

PROPOSAL 28 – 5 AAC 85.030. Hunting seasons and bag limits for deer.

Change the bag limit for deer in Unit 1C, Douglas Island to two bucks

OPPOSE

This is an unnecessary bag limit change as there are no conservation concerns for deer in Unit 1C with the continued allowance to take one doe

PROPOSAL 31 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Expand the RB063 and RB073 brown bear resident hunt area in Unit 1C to include the Chilkat Range, and change the bag limit to one bear every year

SUPPORT as Amended to only include residents



RHAK supports expansion of the RB063 & RB073 hunt areas for resident hunters and increasing the resident brown bear bag limit. We oppose increasing the nonresident bag limit. See our general comments above on increasing nonresident brown bear bag limits.

PROPOSAL 32 -- 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Expand the RB063 and RB073 brown bear hunt area in Unit 1C to include the Chilkat Range, with a bag limit to 1 brown bear annually

SUPPORT as Amended to only include residents

RHAK supports expansion of the RB063 & RB 073 hunt areas for resident hunters, and increasing the resident brown bear bag limit. We oppose increasing the nonresident bag limit. See our general comments above on increasing nonresident brown bear bag limits.

PROPOSAL 33 -- 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Change the bag limit for hunting brown bear in Unit 5, to one bear every regulatory year instead of one bear every four regulatory years

SUPPORT as amended to only include residents

PROPOSAL 37 -- 5 AAC 85.030. Hunting seasons and bag limits for deer.

Reduce the bag limit for deer in Unit 2 from four to three bucks

OPPOSE

80 percent of the land in Unit 2 is federal land and the current federal regulations only allow a two buck bag limit for non-federally qualified users (NFQU) on federal land in Unit 2. Federally-qualified users (FQU) have a 5 deer bag limit on federal lands in Unit 2. This proposal seems designed to impact the NFQ users in Unit 2 who may hunt on state lands that have a four buck bag limit, but that harvest has been extremely minimal over the years.

As stated in our above general comments, if there is a nonresident component with the same bag limits, the nonresident bag limit should always be the first to be reduced if there are conservation or other concerns.

PROPOSAL 38 -- 5 AAC 85.030. Hunting seasons and bag limits for deer.

Reduce the resident bag limit for deer in Unit 2 from four bucks to three

OPPOSE

See our comments on Proposal 37



PROPOSAL 39 – 5 AAC 85.030. Hunting seasons and bag limits for deer.

Reduce bag limit for deer in Unit 2 from four bucks to two

OPPOSE

See our comments on proposal 37

PROPOSAL 40 -- 5 AAC 85.030. Hunting seasons and bag limits for deer.

Reduce the nonresident bag limit for deer in Unit 2 from four bucks to one

SUPPORT

Essentially, nonresidents hunting in Unit 2 on federal lands already have a two buck bag limit. Reducing the nonresident bag limit to one buck makes a lot more sense than reducing the resident bag limit. As previously stated, when and where there are deer conservation or other concerns, if the nonresident bag limit is the same as the resident bag limit, the nonresident bag limit should always be the first to be reduced.

PROPOSAL 41— 5 AAC 85.030. Hunting seasons and bag limits for deer.

Reduce the nonresident bag limit for deer in Unit 2 from four bucks to one

SUPPORT

See our comments on proposal 40.

PROPOSAL 42 – 5 AAC 85.030. Hunting seasons and bag limits for deer.

Change the nonresident start date for the deer hunting season in Unit 2, to August 15

SUPPORT if neither proposal 40 or 41 pass

With concerns over nonresident harvests, if the board doesn't pass proposal 41 or 42 to decrease the nonresident deer bag limit, this is an alternative to decrease nonresident harvest and competition.

PROPOSAL 43 -- 5 AAC 85.030. Hunting seasons and bag limits for deer.

Increase the deer bag limit and extend the season length for residents and nonresidents on the Cleveland Peninsula

SUPPORT as Amended to only include residents

PROPOSAL 44 – 5 AAC 85.040. Hunting seasons and bag limits for goat.



Limit the nonresident permit allocation for the Unit 1A goat drawing hunt DG005, to “up to” 20% of the available permits

SUPPORT as amended to allocate up to 10% of the DG005 permits to nonresidents. If less than 10 permits are available, no nonresident permits will be issued.

According to ADF&G data, in 2022 and 2025, nonresident hunters received 33% of the available DG005 permits under a system in which residents and nonresidents have an equal chance of winning a permit, even though residents submit more applications. There is nothing to prevent nonresidents from winning that percentage (or more) of the permits on any year, which we believe is the point of this proposal. ***Resident hunters should always have a clear and significant priority over nonresident hunters for draw permit hunts!***

With only three to five DG005 permits being issued, there really should be no nonresident opportunity at all, but in future if more permits are issued, under an “up to” 10% allocation for nonresidents there would be one guaranteed nonresident hunt opportunity if 10 permits are issued.

Regarding a guided nonresident vs a 2DK nonresident hunting with a relative Alaska resident, should this proposal pass and in future there are 10 permits issued, our recommendation would be to alternate years in which a nonresident guided permit is available, and a nonresident 2DK permit is available.

PROPOSAL 45 – 5 AAC 85.040. Hunting seasons and bag limits for goat.

Limit the nonresident permit allocation for the Unit 1A goat drawing hunt DG006, to “up to” 20% of the available permits

SUPPORT as amended to allocate up to 10% of the DG006 permits to nonresidents. If less than 10 permits are available, no nonresident permits will be issued.

Over the past ten years, the average number of DG006 permits issued was 21 permits. Under the current draw system, residents and nonresidents have an equal chance of winning a permit, and over the past 5 years ADF&G data shows that nonresidents have won 10 – 15 percent of the total permits.

It seems reasonable under an 90/10% resident/nonresident draw permit allocation system (which RHAK supports) to guarantee nonresidents up to 10% of the permits, which would be 2 permits out of the 21 available. We *do not support* a 20% nonresident allocation.

PROPOSAL 46 -- 5 AAC 85.040. Hunting seasons and bag limits for goat.



Limit the nonresident permit allocation for the Unit 1A goat drawing hunt DG008, to “up to” 20% of the available permits

SUPPORT as amended to allocate up to 10% of the DG008 permits to nonresidents. If less than 10 permits are available, no nonresident permits will be issued.

With only 2 permits available for this DG008 hunt, we don’t support any nonresident allocation. However, there is always a chance under the current draw system with equal odds of winning for both residents and nonresidents, for a nonresident to win a permit.

In future, should the goat population in this area of the Cleveland Peninsula increase and 10 permits become available, we would support one of those permits going to a nonresident. The availability of a nonresident guided permit and a nonresident 2DK permit would alternate each year if a nonresident permit is available.

PROPOSAL 55 – 5 AAC 92.080. Unlawful methods of taking game; exceptions.

Prohibit the use of night vision and infrared devices for taking furbearers in Unit 2

OPPOSE

See our comments on Proposal 12.

PROPOSAL 56

5 AAC 92.080. Unlawful methods of taking game; exceptions.

Prohibit the use of night vision and infrared devices for taking furbearers in Unit 2, during state and federal deer seasons

OPPOSE

See our comments on Proposal 12

PROPOSAL 59 -- 5 AAC 85.035. Hunting seasons and bag limits for elk.

Limit the nonresident permit allocation for the Unit 3, elk drawing hunt DE318, to “up to” 10% of the available permits

SUPPORT

See our comments on Proposals 44-46.

PROPOSAL 60 – 5 AAC 85.035. Hunting seasons and bag limits for elk.



Limit the nonresident permit allocation for the Unit 3 elk drawing hunt DE321, to “up to” 10% of the available permits

SUPPORT

See our comments on Proposals 44-46.

PROPOSAL 61 – 5 AAC 85.035. Hunting seasons and bag limits for elk.

Limit the nonresident permit allocation for the elk drawing hunt DE323, to “up to” 10% of the available permits

SUPPORT

See our comments on Proposals 44-46.

PROPOSAL 62 – 5 AAC 85.035. Hunting seasons and bag limits for elk.

Limit nonresident permit allocation for the Unit 3 elk drawing hunt DE324, to “up to” 10% of the available permits

SUPPORT

See our comments on Proposals 44-46.

PROPOSAL 66 -- 5 AAC 92.132. Bag limit for brown bear.

5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Change the bag limit for hunting brown bear in Unit 3 to one bear every regulatory year

OPPOSE

With a current Unit 3 harvest objective to limit the annual harvest to no more than 3 brown bears, we oppose changing the bag limit.

Thank you to board members for your service!

Respectfully,

Mark Richards

Executive Director Resident Hunters of Alaska (RHAK)



PC73

Name: Arleigh Reynolds

Community of Residence: Sitka

Comment:

Proposal 1: Support

This is an ethical rule that will make hunting safer and help identify legal animals and increase the chances for a clean kill.

Proposal 2: Support

Same reasons as above

Proposal 3: Oppose

This will put undue pressure on host populations especially in remote areas.

Proposal 4: Support

Seems reasonable

Proposal 23: Oppose

In this region food is especially expensive. Deer are an essential subsistence resource for these communities and a luxury for nonresidents. Please prioritize residents by preserving this vital resource



Proposals for 2026 Hunting season

Brye Saviers

Juneau, AK 99801

Proposal 3: I support this proposal. Often Alaskan residents are working during hunting season and can only get a couple days off at a time and the weather doesn't always cooperate for those days. If you only have a 1 day weather window and you fly into a hunt location, not being able to hunt that evening leaves you with only being able to hunt for a couple hours first thing in the morning before you need to start hiking down the mountain in order to catch your afternoon plane ride back home. Giving residents the chance to hunt the same evening they are flying in will help them utilize the little weather window they might have. I would amend this proposal to allow it for residents only as nonresidents must be guided and often pay for 7-10 day hunts so they have long enough hunt times they can find a good weather window to hunt.

Proposal 4: I do not support this proposal. Changing the definition of "taken" for one ungulate and not the others create unnecessary confusion and regulation. If you are going to change the definition of "taken" for mountain goat then you should do it for all ungulates. Deer, moose, elk, ect..

Proposal 5: I support this proposal.

Proposal 6: I support this proposal.

Proposal 7: I support this proposal.

Proposal 8: I support this proposal.

Proposal 9: I support this proposal.

Proposal 10: I support this proposal.

Proposal 11: I support this proposal. Allowing cellular trail cameras for trapping only does not give the trapper an unfair advantage but could save trapped animals from suffering longer than needed. Most trappers do not check their traps every day or even every couple of days. Often traplines are checked on specific days once or twice a week, but being able to use cell cameras for trapping could help let a trapper know if something was trapped possibly leading to an

expedited dispatch if caught in a leghold trap or if it was an animal they did not intend to trap they would have a better chance at getting out right away and releasing that animal and minimize that animals injuries. For example, if a porcupine steps in a leghold trap that was meant for wolves and the trapper got a notification right away, the trapper could potentially run out to that particular trap that day or the following day and release it before the animal is badly hurt. Without cellular notification the trapper would not know the porcupine was trapped and if they had just recently checked the trap the porcupine could be sitting in the trap for several days before the trapper comes back for their regular trap check. While the cellular camera wouldn't give any advantage to a trapper that a regular trail camera couldn't provide, it could help untargeted animals survive and be released without injury. Trappers also often battle with trap theft or harassment. Allowing cellular cameras on a trap sight could also help curb that issue because a person stealing or messing with a trappers gear could potentially be caught in the act.

Proposal 12: I do not support this proposal.

Proposal 13: I do not support this proposal.

Proposal 14: I support this proposal.

Proposal 15: I support this proposal.

Proposal 19: I support this Proposal. Unit 4 has some of the highest brown bear density in the state but in the spring, brown bears often aren't coming out of their dens until mid to late April so by the time they make it to the beach and hunters are able to pursue them hunters have a very short hunt window. This window is made shorter due to bad weather making access by boat unsafe during storms. Allowing hunters to pursue brown bear until the end of the month will give residents with smaller boats a better chance of getting out and pursuing these animals. The slightly longer hunt window will also help reduce hunter competition and conflict due to the fact that a longer season means hunters can spread hunting trips out because there are more huntable days to capitalize on.

Proposal 22: I support this Proposal. Unit 4 has an extremely healthy brown bear population. Opening the season on September 1st would give hunters more opportunity in the fall and allow residents with smaller boats a chance to hunt bear before the typical fall weather stops them from reaching hunting areas.



Proposal 23: I do not support this proposal. Residents already suffer enough from hunting pressure from nonresident hunters. We already allow them to come and harvest 2 bucks which most other states do not allow. They don't need a guide and can do DIY hunts easily and affordably but because they don't need a guide, they generally are hunting areas that are reasonably accessible which puts them in direct competition with residents. Residents put up with all the hardships Alaska has to offer year-round and deserve to be able to fill their freezers without constant pressure from nonresident hunters. Leave the 2-buck bag limit in place.

Proposal 26: I do not support this proposal the way it is written. While I agree there should be a penalty for taking nannies I disagree on the amount of time suggested in this proposal. I would amend this proposal from not being able to hunt goats in unit 1c from 4 years to 2 years. This would encourage people to focus only on taking a billy but would not completely stop people from being able to hunt goats for so long. Sometimes an honest mistake is made but nothing beats experience and time in the field. Not allowing a hunter to hunt goats for 4 years will greatly hinder that experience and time in the field, but penalizing hunters to not be able to hunt goats the following year if they kill a nanny will make hunters take more time to study the goat they are targeting before pulling the trigger. If this proposal is going to pass as it stands I would encourage the board to only make this for the Tracy Arm unit as this proposal is focused on that particular area.

Proposal 27: I support this proposal. Douglas island is an extremely easy area to access and offers residents without means of a boat or plane to still be able to hunt and fill their freezers but due to the amount of hunt pressure we should not allow doe harvest to keep the deer population healthy and sustainable.

Proposal 29: I do not support this proposal. While I support proposal 27 on only allowing bucks to be taken, I do not support an antler restriction. Douglas island is an accessible and safe area to take young or new deer hunters. Not allowing hunters to be able to take a spike makes no sense. Douglas is not place we are trying to grow trophy class deer. It's area for residents to be able to easily access and have the chance to take their children to harvest their first buck without unnecessary antler restrictions.

Proposal 31: I support this proposal. In my opinion Unit 1C has seen an increase in the brown bear population and a decrease in the black bear population in areas they share. I think allowing

more hunt opportunities for brown bears would help balance this issue and let the black bear population of those areas to start to rebound. Also 1 brown bear every 4 years is very restrictive. If the Board of Game isn't willing to allow 1 brown bear every year maybe a compromise in the middle and allow 1 one brown bear every 2 years. It gives hunters more opportunities while still not allowing over harvest.

Proposal 32: I support this proposal. In my opinion Unit 1C has seen an increase in the brown bear population and a decrease in the black bear population in areas they share. I think allowing more hunt opportunities for brown bears would help balance this issue out and let the black bear population of those areas to start to rebound. Also 1 brown bear every 4 years is very restrictive. If the Board of Game isn't willing to allow 1 brown bear every year maybe a compromise in the middle and allow 1 one brown bear every 2 years. It gives hunters more opportunities while still not allowing over harvest.

Proposal 35: I do not support this proposal the way it is written. Thane road is only about 3.5 miles long starting from downtown Juneau. I recently lived out there for years and it is a busy road especially from spring until fall. Multiple tourist companies have tours out there and the people who live out there are quite protective of the area. They have community meetings and even a FB page for thane homeowners. Most of the road is less than 100 yards from the beach can be easily seen from the road and vice versa. I believe allowing road hunting out there would bring many conflicts for hunters from thane homeowners, tourists, and people fishing on the beach. While I generally don't like extra restrictions for resident hunters and always want more hunting opportunities, I think this would be more of a problem than its worth. I do think there is a compromise which would be to allow bow hunting on the uphill side of the road but not make it legal within 100 yards from the road. Due to the thick forest, a bow hunter 100 yards from the road would be out of visibility from anyone on the road and would therefore minimize hunter conflict from drivers, homeowners, and tourists.

Proposal 40: I support this proposal.

Proposal 41: I support this proposal.

Proposal 42: I support this proposal. Residents should be able to have the first 15 days to hunt without nonresident pressure. The first 2 weeks of the deer season are often congested for residents hunting areas that are accessible from town or small boat. Alaskan residents should



take priority over nonresidents. The season is extremely long and letting residents have 15 days without nonresident pressure is something I think Alaskan residents deserve.

Proposal 44: I support this proposal. This is a special tag that residents can access extremely easily and affordably. This is not something that is very common now a days. Giving Alaskan residents priority is something that I think is very important for our state when it comes to our resources. Allowing only 20% of the draw allocation to nonresidents still gives nonresidents a chance at a special tag but prioritizes Alaskan residents. The BOG needs to show residents that they matter and this is a good step in showing that.

Proposal 45: I support this proposal. This is a special tag that residents can access extremely easily and affordably. This is not something that is very common now a days. Giving Alaskan residents priority is something that I think is very important for our state when it comes to our resources. Allowing only 20% of the draw allocation to nonresidents still gives nonresidents a chance at a special tag but prioritizes Alaskan residents. The BOG needs to show residents that they matter and this is a good step in showing that.

Proposal 46: I support this proposal. This is a special tag that residents can access extremely easily and affordably. This is not something that is very common now a days. Giving Alaskan residents priority is something that I think is very important for our state when it comes to our resources. Allowing only 20% of the draw allocation to nonresidents still gives nonresidents a chance at a special tag but prioritizes Alaskan residents. The BOG needs to show residents that they matter and this is a good step in showing that.



9 January 2026

Alaska Board of Game
Attn: Mr. Jake Fletcher
P.O. Box 115526
Juneau, AK 99811

Dear Mr. Fletcher,

Sealaska Heritage Institute writes to you in opposition to Proposal 26, which, if adopted, would restrict hunters who take nanny goats in Unit 1C from goat hunting in that unit for the following four regulatory years. Sealaska Heritage Institute strongly opposes Proposal 26 as it would do nothing to improve mountain goat conservation yet place immense and inequitable burden on Alaska residents to accurately sex goats in the field.

While the proponents of the proposal suggest that nanny harvest has increased in recent years, they fail to explain the relationship between guiding and increased harvest. The Mountain Goat Management Report and Plan for Unit 1C, published in 2021 by the Alaska Department of Fish and Game, states, “During the past 30 years there have been 3 major impacts to mountain goats resulting from economic development. The first has been increased guiding within the Tracy and Endicott arms.” The report goes on to explain that during the early years of increased guiding “the number of guided hunts increased steadily to the point where the department expected to put a limit on harvest.” These impacts were ultimately stabilized by United States Forest Service actions, which limited the number of clients guides could take into the Tracy and Endicott arms beginning in 2002. In other words, the Alaska Department of Fish and Game has identified increased guiding—not nanny harvest by Alaska residents—as one of the primary anthropogenic impacts on mountain goats in Unit 1C. Additionally, harvest ratios of billies:nannies in Unit 1C remain well within the Department’s management objective of 2:1.

Adoption of Proposal 26 would not address the impact increased guiding has on the Unit 1C mountain goat population or resident harvest opportunity. On the contrary, adoption of the proposal would result in immense loss of user opportunity, particularly for Alaska residents who already harvest less than 20% of the total goats taken in Unit 1C. Given the requirement that nonresidents hunt with a guide or close kin who reside in Alaska, most guided hunters are nonresidents who come to the state for an expensive once-in-a-lifetime hunt. To these nonresident hunters, a four-year restriction on hunting goats in Unit 1C is unlikely to influence their hunting behavior. On the other hand, such a restriction would dramatically penalize Alaska residents, who are much more likely to hunt these areas year after year. Moreover, such a restriction would likely dissuade young Alaskans from hunting mountain goats altogether.

The Indigenous peoples of Southeast Alaska have hunted mountain goats for thousands of years. Alongside meat, goat materials are integral to Southeast Alaska Native Cultures. For example,



Chilkat weaving, which is characterized by its unique twining method, is a hallmark art form of the region. Traditionally, weavers relied on mountain goat wool to create robes and blankets—although declines in the ability to harvest goats and wool at the appropriate time of year have made other textiles more common. These articles are celebrated worldwide as intricate examples of Northwest Coast culture and art. Many Chilkat weavers have pointed out that the articles they produce also preserve the memory of the goat itself, deepening the long-term relationship between mountain goats and Alaska Native communities. Because mountain goat wool does not fully form and separate from the goat's hair until late winter, guided hunters often create high pressure early in the season and accumulate much of the point allocation for the unit. This scenario makes it even harder for Alaska Natives and non-Native residents to harvest goats in winter when snow pushes the animals to lower elevations, creating a situation in which customary and traditional harvest is further jeopardized by guided nonresident hunts.

In light of this, Sealaska Heritage Institute is actively trying to revitalize traditional mountain goat hunting and the use of mountain goat materials in Alaska Native art. But the adoption of Proposal 26 would impede those efforts making the continuation of traditional harvest more difficult, while not addressing the most significant impacts to the affected mountain goat population. As organizations like Sealaska Heritage Institute seek to restore interest in hunting among Alaska's youth, regulatory actions like those suggested in Proposal 26 present even more obstacles to our youth as they seek to learn the traditions of hunting and subsistence in Alaska. Such restrictions challenge the ability of Alaskans to continue to hunt, provide meat for their communities, wool to traditional weavers, and horns to spoon carvers. In essence, proposals like this challenge the Alaska way of life. So, we urge you and the other Board members to reject this proposal and rely on the existing point system, which has been used to successfully conserve the Unit 1C goat population since the 1980s.

Thank you for considering our comments. We appreciate your commitment to the residents of Alaska and the conservation of our incredible wildlife populations.

Sincerely,

Rosita Kaaháni Worl, Ph.D
President





PC76

Name: Luis Silva

Community of Residence: Petersburg

Comment:

Proposal 67: Support

Luis Silva

Representing myself

To whom it may concern:

I'm in favor of proposal #67.

Allowing bow hunting by adding this area into the Petersburg Management Area would provide more opportunities for exploration and hunting in deer country. This would ultimately open up more areas and relieve some of the pressure Archers are experiencing closer to town. As you know, in the PMA, we share areas with a highly used highway of trails with recreational users. Additionally, there are future plans for local organizations to plumb more gravel trails locally, similar to the trails that were implemented for City Creek and Raven's Roost, beginning at Sandy Beach. While these are great opportunities for recreational users, I've had my fair share of hunting in areas where I run into dog walkers or hikers using the same area...not a bad thing, because I hike too, but the pressure is still felt. This puts more pressure not only on the archers, but also the blacktail deer population. The group of sportsmen that make up the archer population in Petersburg have to go through a very rigorous program to become certified as a bow hunter, which includes intense training on ethics and making clean and ethical kills. I do not take lightly the opportunity to hunt with my bow, and I'm greatly blessed to be able to do so with an expanded hunting season. I thank everyone that has allowed this season to happen. Lastly, hunting the management area is a privilege, and I use my deer tags to feed my family and live off the land. Deer meat is a staple in our diet, and approving proposal #67 would expand hunting opportunities and support the subsistence lifestyle for generations of families to come.

Thank you for your time,

Luis Silva

Proposal 68: Support

Luis Silva

Representing myself

To whom it may concern:

I'm in favor of proposal #68.

Allowing bow hunting by adding this area into the Petersburg Management Area would provide more opportunities for exploration and hunting in deer country. This would ultimately open up more areas and relieve some of the pressure Archers are experiencing closer to town. As you know, in the PMA, we

share areas with a highly used highway of trails with recreational users. Additionally, there are future plans for local organizations to plumb more gravel trails locally, similar to the trails that were implemented for City Creek and Raven's Roost, beginning at Sandy Beach. While these are great opportunities for recreational users, I've had my fair share of hunting in areas where I run into dog walkers or hikers using the same area...not a bad thing, because I hike too, but the pressure is still felt. This puts more pressure not only on the archers, but also the blacktail deer population. The group of sportsmen that make up the archer population in Petersburg have to go through a very rigorous program to become certified as a bow hunter, which includes intense training on ethics and making clean and ethical kills. I do not take lightly the opportunity to hunt with my bow, and I'm greatly blessed to be able to do so with an expanded hunting season. I thank everyone that has allowed this season to happen. Lastly, hunting the management area is a privilege, and I use my deer tags to feed my family and live off the land. Deer meat is a staple in our diet, and approving proposal # 68 would expand hunting opportunities and support the subsistence lifestyle for generations of families to come.

Thank you for your time,

Luis Silva



***Southeast Alaska
Subsistence Regional
Advisory Council***

**Don Hernandez, Chairman
1011 E. Tudor Road, MS121
Anchorage, Alaska 99503**

**In Reply Refer To:
OSM.R26001**

January 06 2026

Jake Fletcher, Chair
Alaska Board of Game
Alaska Department of Fish and Game
Board's Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Fletcher,

I write to you on behalf of the Southeast Alaska Subsistence Regional Advisory Council (Council) to provide the Council's comments on proposals that will be considered during the Alaska Board of Game (BOG) Southeast Region meeting in Wrangell on January 23-27, 2026.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Southeast Alaska Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a public forum for the expression of opinions and the region recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on December 17-18, 2025, in Wrangell, and discussed a number of BOG proposals. Please see the Council comments below.

Proposal 18 *Shift the hunting season for grouse in Units 1-5 to August 10 through May 31*

The Council **supports** this proposal. The Council believes that this change to the season dates for grouse hunting will not impact sustainability of the grouse population and would increase opportunity for subsistence harvest. Although this change to the season end dates extends into grouse breeding season, the Council does not think that the sex selection of this harvest will be impacted, as most grouse hunting is conducted using male vocalization to locate and harvest male grouse. It is rare to harvest a female grouse. The Council does not think this regulation change will impact females, and therefore the overall population sustainability. They view this proposal as providing additional opportunity for subsistence harvest, especially for youth, who are typically in school until May. The Council also notes that in years of heavy snowfall and/or mild spring conditions, it can be challenging to access grouse hunting areas before the end of the current grouse season.

Proposal 23 *Increase the nonresident bag limit for deer in Unit 4*

The Council **opposes** this proposal. The Council believes that the current limit of two deer for nonresidents provides sufficient opportunity for sport harvest of deer. Increasing the nonresident bag limit for Unit 4 to four deer would increase competition between nonresident and subsistence harvesters. The Council also does not support the harvest of does by nonresidents. Although Unit 4 deer populations appear stable, heavy winters and other unknown circumstances can have drastic impacts on the deer population over a relatively short period.

Proposals 40 & 41 *Reduce the nonresident bag limit for deer in Unit 2 from four bucks to one*

The Council **supports** these proposals. The Council believes that a one buck limit for deer for nonresidents would provide sufficient opportunity for sport harvest of deer in Unit 2. Subsistence users of Unit 2 have repeatedly told the Council about challenges locating and harvesting deer on Prince of Wales Island. Whether these challenges are due to a deer population issue or harvest competition, this proposal would address both causes.

Proposal 48 *Increase the Unit 2 wolf population objective*

The Council **opposes** this proposal. The Council has received Traditional Ecological Knowledge from subsistence users on Prince of Wales Island, which suggests that there is a harvestable surplus of wolves that are not being harvested. Meanwhile, subsistence needs for wolf pelts are not being met. The Council has concerns about the deer population and availability of harvestable deer. A concern that would increase if the wolf population objective was increased.

Proposal 51 *Extend the wolf trapping season to 45 days on Prince of Wales Island, Unit 2*

The Council is **neutral** on this proposal. The Council recognizes that the trapping season is already 137 days long and a 45-day season would be a reduction to the codified trapping season. However, the Council supports extending the standard 31-day trapping season enacted through Emergency Order every year. The Council feels that the wolf population is too large and is not

being managed to the current state population goal of 150-200 wolves. Traditional Ecological Knowledge suggests that there is a harvestable surplus of wolves that are not being harvested, and subsistence needs are not being met for wolf pelts.

Proposal 52 *Add Unit 2 as an area for intensive management of wolves*

The Council **supports** this proposal. The Council would like to see Unit 2 managed through an intensive management strategy that prioritizes human consumption of multiple species. The Council would like the Alaska Department of Fish and Game to work with wolf trappers and hunters in Unit 2 to direct wolf harvest to different wolf packs or areas to more closely address genetic diversity and demographic population concerns for wolves. The goal of this intensive management unit would be to more strategically harvest wolves to decrease predation rates on deer without extensively increasing wolf harvest.

Proposal 57 *Change the season, bag limit, and permit requirement for hunting elk on the Zarembo Island in Unit 3*

The Council **supports** this proposal. Subsistence users have indicated that the elk on Zarembo Island are outcompeting deer and have noted that as a result, the deer on Zarembo Island are smaller than deer from nearby areas. Yet, subsistence users cannot harvest elk to supplement their deer harvest from Zarembo, which is an important subsistence harvest area for residents of Petersburg and Wrangell. Therefore, the current elk hunt is used as a sport hunt that is in direct conflict with subsistence harvest of deer.

Proposal 64 *Eliminate the regulation that excludes broken, damaged, or altered antlers from the definition of spike-fork antlers for Units 1B, 1C and 3*

The Council is **neutral** on this proposal. The Council does not agree with the forfeiture of any subsistence harvest animals, including those with broken, damaged or altered antlers. Subsistence users have indicated that in some years the occurrence of broken and damaged antlers is common within the population. Moose are a critical subsistence resource for many communities in the areas affected by this proposal. However, the Council understands the issue that would be created by this proposal for enforcement surrounding intentional alteration of moose antlers.

Proposal 65 *Remove the antler restriction for the moose hunt in Units 1B and 3 and replace with a shorter, any bull hunt in October*

The Council **opposes** this proposal. Reducing this moose season would intensify the harvest pressure and competition during the 15-day window, which would reduce the overall opportunity from an individual basis. Additionally, the Council believes that the “any bull” component of this proposal could lead to overharvest and a reduction in the sustainability of this population, especially with the intensity that a shorten harvest window would create.

Proposal 69 *Extend the grouse hunting season in Unit 3, to close June 15 instead of May 15*

The Council **supports** this proposal. The Council believes that this change to the season dates for grouse hunting will not impact the sustainability of the grouse population and increases opportunity for subsistence harvest. Although this change to the season end dates extends into grouse breeding season, the Council does not think that the sex selection of this harvest will be impacted, as most grouse hunting is conducted using male vocalization to locate and harvest male grouse. It is rare to harvest a female grouse. The Council does not think this regulation change will impact females and therefore, the overall population sustainability. They view this proposal as providing additional opportunity for subsistence harvest, especially for youth, who are typically in school until May. The Council also notes that in years of heavy snowfall and/or mild spring conditions, it can be challenging to access grouse hunting areas before the end of the current grouse season.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions regarding this letter, they can be addressed through our Council Coordinator DeAnna Perry, at [REDACTED] or deanna.perry@usda.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald Hernandez".

Donald Hernandez
Chair

cc: Federal Subsistence Board
Southeast Alaska Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game
Administrative Record



Name: Ted Spraker

Community of Residence: Soldotna

Comment:

Proposal 1: Oppose

Inconsistent with statewide regulations

Proposal 2: Oppose

Inconsistent with statewide regulations.

Proposal 3: Oppose

Inconsistent with other areas that have the same weather-related issues.

Proposal 5: Support

To be consistent with statewide regulations.

Proposal 11: General_Comment

The prohibition of this use was focused on hunting not trapping. However, this should be a statewide proposal.

Proposal 12: Oppose

Inconsistent with statewide regulations.

Proposal 13: Oppose

Same comment as #11.

Proposal 15: Support

This would simplify the regulation and doubtfully increase the harvest.

Proposal 26: Oppose Too restrictive on non-residents, additionally, the penalty for harvesting a nanny in other areas in five years. Regulations should be as consistent as possible.

Proposal 29: Oppose

Survival rate of smaller yearlings is lower than larger yearlings. Harvesting of spike bucks should not be restricted because it may increase harvest of larger yearlings. Additionally, small bucks are sometimes difficult to separate from does.

Proposal 30: General_Comment

I would caution the board on adopting this proposal unless it only allows individuals with 100% disabilities.

Proposal 33: Support

Inconsistent with most units in the state.

Proposal 34: Support

I strongly support this proposal. It would provide additional harvest opportunities and would not jeopardize the safety of residents living in the area. Similar archery only seasons are allowed in other parts of the state under similar conditions and have been in place for years. This may also reduce some of the local black bear nuisance issues in this area.

Proposal 35: Support

Same as comment on proposal #34.

Proposal 40: Support

If the population of deer in Unit 2 is truly declining, non-residents should be only allowed to harvest one buck.

Proposal 41: Support

Same as comments on #40.

Proposal 44: Oppose

I oppose all of these requests to set a percentage on non-resident draw tags. This is an additional step in the draw system for the department, and I doubt non-residents draw that many tags. If there is an area where non-residents are receiving most of the tags, this may be justified.

Proposal 45: Oppose

Same as #44

Proposal 46: Oppose

Same as #44

Proposal 47: Oppose

There was a clear reason why the board required salvage of black bear meat from January 1st to May 31st but not after that date, meat quality. This would also make this area inconsistent with the current statewide regulation.

Proposal 53: Support with Amendment

I support trapper education, but it should be phased in over a couple years.

Proposal 54: Oppose

This is a huge problem where it is required on wildlife refuges in other parts of the state. Protection officers and trappers know where people trap and can assist in locating trappers if a problem occurs. It's also a major inconvenience to make sure every trap and snare has a tag affixed.

Proposal 55: Oppose

Inconsistent with current regulations in other Units.

Proposal 56: Oppose

Same comment as #55.

Proposal 59: Oppose

Same comment as #44.

Proposal 60: Oppose

Same comment as #44.

Proposal 61: Oppose

Same comment as #44.

Proposal 62: Oppose

Same comment as #44.

Proposal 65: Oppose

Antler restrictions are designed to control harvest. Moose are in the rut in late September early October, and an any bull season harvest would be difficult to control. Plus, reducing the season length only increases the number of hunters in the field at one time, resulting in over-crowding.

Proposal 66: Support

There are very few units where the brown bear bag limit is one bear per four years. Since few hunters harvest more than one bear in their lifetime, this requirement needs to be evaluated to determine if statewide consistence is warranted.

Proposal 67: Support

Same as comments on #34.



PC79

Name: Charley Streuli

Community of Residence: Petersburg

Comment:

Proposal 67: Support

I support the proposal submitted by Kaleb Baird and have talked to Kaleb about it. I am a certified bowhunter and I hunt the current open area. I think this is a good idea that will expand the area open to archery only while having a minimal affect on other hunters.



PC80

Name: Jerry Taylor

Community of Residence: Juneau

Comment:

Proposal 27: Oppose

The proposal states the need for Quality Deer Herd Management for this area but provides no sources or citations of how to apply this. These management plans were developed for deer populations in the contiguous 48 states and are not applicable to Alaska. The Alaska Department of Fish and Game,

Division of Wildlife Conservation, (Churchwell, R. T. 2023) has prepared a deer management report and plan for Game Management Unit 1C, which includes Douglas Island.

The proposal states that the decline of deer numbers on Douglas Island is primarily the result of predation. No data or citations are provided to support this statement. The State deer management report recognizes the occurrence of wolf predation on Douglas Island but states the amount of predation of deer by wolves is unknown (Churchwell, R. T. 2023).

I have hunted deer on Douglas Island for 62 years. I have seen the deer population wax and wane, based on the amount and persistence of snowfall. I believe these proposals are well intentioned, but perhaps there are different ways to address the deer population numbers on Douglas Island.

Reference: Churchwell, R. T. 2023. Deer management report and plan, Game Management Unit 1C: Report period 1 July 2016–30 June 2021, and plan period 1 July 2021–30 June 2026. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-5, Juneau.

Proposal 28: Oppose

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The proposal calls for the establishment of the harvest of antlered deer only on Douglas Island to increase deer herd size. An example of an antlered deer harvest restriction is close at hand in Unit 1C. The 25+-year restriction to antlered deer only in Unit 1C mainland has not resulted in an increase in that herd. This restriction may result in a reduction of the total harvest on Douglas Island because of the difficulty of seeing antlers and counting antler tines in dense forest growth. With a decreased harvest, the herd may increase, but there may be unwanted results. Referring to the cyclical relationship of lynx and snowshoe hares, increasing the prey population results in an increase in the predator numbers.

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Reference: Churchwell, R. T. 2023. Deer management report and plan, Game Management Unit 1C: Report period 1 July 2016–30 June 2021, and plan period 1 July 2021–30 June 2026. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-5, Juneau.



PC81

Name: Nicholas Orr, Territorial Sportsmen Inc.

Community of Residence: Juneau

Comment:

Proposal 2: Support

TSI supports this proposal as it will stop what apparently is legally ambiguous night 'hunting' of deer in Southeast AK.

Proposal 3: Oppose

TSI is against allowing same day airborne taking of goats in Units 1-5 as this is against fair chase principles of Alaska. The one species that allows same day airborne hunting -- Sitka Blacktail Deer -- is a species with a high reproductive rate. Conversely, mountain goats are a species with one of the lowest reproductive rates and are ill suited to allow same day airborne hunting.

Proposal 4: Support

TSI supports this proposal from both an ethical perspective -- if you potentially kill something, you should punch your tag and report it as such -- and from a biological perspective. Mountain goats have a low reproductive rate and hunts are closely monitored with biologists assigning a point value to every goat harvested. Any potential harvest / hunter-related fatality needs to be reported so ADFG can properly manage mountain goat populations.

Proposal 6: Support

TSI supports these proposals on the grounds that Unit 1 wolf populations are robust and hunter take is low. Furthermore, TSI supports simplifying regulations whenever possible -- something this proposal accomplishes.

Proposal 7: Support

TSI supports these proposals on the grounds that Unit 1 wolf populations are robust and hunter take is low. Furthermore, TSI supports simplifying regulations whenever possible -- something this proposal accomplishes.

Proposal 9: Support

TSI support proposal 9 because it establishes both a hunting AND trapping season for mountain lions. We do not believe there are significant or even consistent populations of mountain lions in SE, but having a season along with sealing requirements encourages both trappers and hunters to report their harvest and allows ADFG to collect information to potentially manage this species were it to colonize Southeast Alaska.

Proposal 11: Support

TSI supports this proposal as we support any tool that potentially allows for minimization of animal time in trap and serves as a deterrent for people who would interfere with lawful trapping. We also note that the presence of a cellular game camera would not remove or reduce the responsibility of a trapper to regularly check their sets.

Proposal 14: Support

TSI supports a limit of 3, though prefers the no limit option as it provides more accurate harvest data. Both proposals have no impact on fisher populations as they are caught incidentally.

Proposal 15: Support

TSI supports this proposal with the understanding that fisher are taken in Southeast Alaska incidentally while targeting marten. Given they cannot be effectively targeted, TSI does not want to put trappers in a position where they harvest a fisher and simply store the hide in the freezer until next year to avoid forfeiture. Removing the fisher limit provides ADFG with accurate harvest data and should result in no change in the amount of fisher taken.

Proposal 17: Support

TSI supports this proposal as it presents a unique opportunity in small game hunting to selectively harvest males only. This is biologically more sustainable and is what many hunters are doing already.

Proposal 18: Oppose

TSI opposes this proposal as it extends the hunting season into a time period when birds are increasingly starting to tend to nests.

Proposal 24: Support

The Northeast Chichagof Controlled Use Area (NCCUA) was created to deal with motorized access that comes with the extensive road network on Chichagof. The area proposed to be excluded from the NCCUA has no roads and hence doesn't need to be subject to the same restriction.

Proposal 27: Support

TSI supports this proposal as Douglas Island is the only place in Southeast Alaska with a road system -- as well as populations of wolves black bears -- that allows a doe harvest. Douglas Island also has the largest human population in Southeast Alaska focusing on a relatively small area that can be accessed by highway vehicle / foot. Furthermore, the "1 doe" policy is almost impossible to enforce as barring multiple encounters with the same wildlife officer, hunters can simply claim any doe is their "1 doe". In order to help this population improve resiliency, TSI recommends supporting this proposal.

Proposal 34: Oppose

TSI opposes this proposal on the grounds that it's too inclusive. We can easily imagine a scenario where someone uses poor judgement and legally shoots and wounds a bear in a densely populated neighborhood in downtown Juneau or the Mendenhall Valley.

Proposal 35: Oppose

TSI opposes this proposal due to potential user conflicts and the possibility of wounded animals ending up on private property.

**PC82****Name:** Andrew Thoms**Community of Residence:** Sitka**Comment:****Proposal 1: Support**

X

Proposal 2: Support

X

Proposal 3: Oppose

The current regulations have been working really good.

Proposal 8: Oppose

There isn't an established population

Proposal 9: Oppose

There isn't an established population

Proposal 23: Oppose

The deer population might be severely reduced after this current winter which is coming on a lot harder than any winter in the last 10 years.



Name: Dillon Tomaro

Community of Residence: Juneau

Comment:

Proposal 1: Oppose

I believe that prohibiting the use of artificial light is sufficient. If you can spot, identify, and see the animal through your scope with natural light then you should be able to legally harvest an animal still.

Proposal 2: Oppose

I believe that prohibiting the use of artificial light is sufficient. If you can spot, identify, and see the deer through your scope with natural light then you should be able to legally harvest a deer

Proposal 3: Support

I believe this is no different than harvesting a deer the same day as flying to get to the location your hunting. This will assist hunters harvest goat and feed their families.

Proposal 4: Oppose

There is no current issue with the way the regs currently are set. I believe this decision should be left to the hunter's judgement if the animal has been lethally wounded or not. If the hunter can decide that the shot was not lethal then they should be able to continue to peruse a goat that regulatory season.

Proposal 5: Support

I have been a part of many brown bear hunts in the last decade in unit 1 remainder and there is obviously an abundance of brown bear. This would allow more frequent hunting opportunity to the small group of hunters who target brown bear in this location and would likely not have much of an impact if any on the brown bear population (Berners Bay drainage as an example)

Proposal 6: Support

This will allow more opportunities for hunters to harvest goat and wolves, which will increase the population of deer and moose.

Proposal 7: Support

This will allow more opportunities for hunters to harvest goat and wolves, which will increase the population of deer and moose.

Proposal 8: Support

If you see a cougar you should be able to harvest it, within a legal season, just as a wolf.

Proposal 9: Support

Now that mountain lion are moving into this region, there should be a legal season for trapping. This will encourage trappers to target the species and provide more options for trappers.

Proposal 10: Support

As an avid trapper, this would reduce the amount of times that a trapper would need to go to Adfg to get a fur seal. There are already so many requirements that have to be followed and this would help simplify the requirements for trapping beavers.

Proposal 11: Support

The weather is very unpredictable in SE Alaska and it would be nice to know if an animal is in your trap. I usually check traps once a week on the weekend, although if I knew that a animal was in the trap via game camera notification, I would be trying to get to that set as soon as water weather allows (before the next weekend)

Proposal 12: Oppose

This would eliminate more methods of harvesting fur ear which I do not support.

Proposal 13: Oppose

This would eliminate more methods of harvesting fur ear which I do not support.

Proposal 14: Support

This would allow more harvest opportunity for trappers which is positive thing.

Proposal 15: Support

This would allow more harvest opportunity for trappers which is positive thing. This would also help trappers who have caught a fisher in an unintended set, witching season dates, if they have already harvested one.

Proposal 16: Oppose

Current Season dates are adequate and have been working for resource management for a long time

Proposal 17: Oppose

There are plenty of grouse and the current limit is fair and adequate for the current grouse population

Proposal 18: Support

This would allow for a longer window for male grouse to be harvested while they are still in full mating season and hooting

Proposal 19: Support

It seems that brown bear hunting usually has a late kick off due to later springs and this would allow for a better harvest window for when bears are feeding on the beaches and grass is fully blooming.

Proposal 20: Support

A longer hunting season for brown bear will help deer populations

Proposal 21: Support

A longer hunting season for brown bear will help deer populations

Proposal 22: Support

A longer hunting season for brown bear will help deer populations

Proposal 23: Oppose

Deer limits should be limited for nonresidents to secure more opportunity for residents to harvest deer

Proposal 24: Oppose

This is not necessary. More access to more hunters is better

Proposal 25: General_Comment

No opinion

Proposal 26: Oppose Ethical hunters do their best to harvest mature Billy's although not everyone is hunting for trophies and if a nanny is all they see when they have spent hundreds of dollars on gas to get to the hunting location they should be able to harvest the nanny to feed their family. There is a point system in place to ensure that over harvest does not take place. Hunters should not lose opportunity to hunt in the following seasons if they harvest a nanny.

Proposal 27: Oppose

Douglas has a healthy population of deer and the current regulations are adequate. Not every hunter has means to get to admiralty to hunt, so Douglas is their only option to put deer in the freezer. This proposal would make it more difficult for hunters to harvest a legal deer on Douglas.

Proposal 28: Oppose

Douglas has an abundance of deer so this is not needed. The current Douglas deer regulations are sustainable and allows hunters without boats to put deer in the freezer.

Proposal 29: Oppose

The deer regulations for Douglas should not be increased. Douglas is a critical location for hunters without boats to be able to hunt deer and should not be increasingly restricted on opportunity

Proposal 30: Oppose

Not needed.

Proposal 31: Support

There are plenty of bears in these locations and this would provide more opportunity for hunters to harvest bears and assist with predator control

Proposal 32: Support

There are plenty of bears in these locations and this would provide more opportunity for hunters to harvest bears and assist with predator control

Proposal 33: Support

There are plenty of bears in these locations and this would provide more opportunity for hunters to harvest bears and assist with predator control

Proposal 34: Support

This will allow more opportunity for now hunter's which is a positive change

Proposal 35: Support

This will allow more opportunity for now hunter's which is a positive change

Proposal 36: Oppose

No change needed for current regs

Proposal 37: Oppose

There are enough deer to support a bag limit of 4

Proposal 38: Oppose

There are enough deer to support a bag limit of 4

Proposal 39: Oppose

There are enough deer to support a bag limit of 4

Proposal 40: Support

Less opportunity for nonresident means more opportunity for locals

Proposal 41: Support

Less opportunity for nonresident means more opportunity for locals

Proposal 42: Support

Less opportunity for nonresident means more opportunity for locals

Proposal 43: Support

This will allow for more harvest opportunity for all

Proposal 44: Support

Less opportunity for nonresident means more opportunity for locals

Proposal 45: Support

Less opportunity for nonresident means more opportunity for locals

Proposal 46: Support

Less opportunity for nonresident means more opportunity for locals

Proposal 47: Support

This will increase incentive to harvest black bears in may, for hunters who do not like to eat black bear but do like to partake in predator control to help deer populations

Proposal 48: General_Comment

No comment

Proposal 49: General_Comment

No comment

Proposal 50: General_Comment

No comment

Proposal 51: Support

Longer wolf season will allow for more people to partake in the trapping season for wolves

Proposal 52: Oppose

Current regulations are sufficient

Proposal 53: Oppose

Not needed. Trappers usually learn from experienced trappers

Proposal 54: Oppose

This is not needed

Proposal 55: General_Comment

No comment

Proposal 57: Support

It would be nice to not have to draw a tag to harvest an elk.

Proposal 58: Support

It would be nice to not have to draw a tag to harvest an elk.

Proposal 64: Support

It is already very difficult to find a legal moose in these locations so this would assist hunter's with successfully harvesting a legal moose

Proposal 65: Support

This would help more hunters harvest a legal moose

Proposal 66: Support

Less bears means more deer

Proposal 67: General_Comment

No comment

Proposal 68: General_Comment

No comment

Proposal 69: Support

There are plenty of grouse in this locations and this will provide more hunting opportunity



PC84

Name: Craig Van Arsdale

Community of Residence: Soldotna

Comment:

Proposal 1: Oppose

Too much variability in daylight hours

Proposal 2: Oppose

Too much variability in daylight hours

Proposal 3: Oppose

Not Fair Chase

Proposal 6: Support

would like to see more opportunities

Proposal 7: Support

would like to see more opportunities

Proposal 8: Support

we do not need a new apex predator on the landscape

Proposal 9: Support

we do not need a new apex predator on the landscape

Proposal 11: Oppose

do not support this technology

Proposal 12: Support

do not support this technology

Proposal 13: Support

do not support this technology

Proposal 19: Support

would like to see more opportunities

Proposal 20: Support

would like to see more opportunities

Proposal 21: Support

would like to see more opportunities

Proposal 22: Support

would like to see more opportunities

Proposal 26: Support The promotion of harvesting Billies will create more goat hunting opportunities

Proposal 29: Oppose

Antler restrictions do not work

Proposal 34: Support

Bowhunting areas are a great way to create additional hunting opportunities where close proximity to human occupancies exist without safety concerns.

Proposal 35: Support

Bowhunting areas are a great way to create additional hunting opportunities where close proximity to human occupancies exist without safety concerns.

Proposal 37: Oppose

The deer herd is stable in this area

Proposal 38: Oppose

The deer herd is stable in this area

Proposal 39: Oppose

The deer herd is stable in this area

Proposal 40: Oppose

The deer herd is stable in this area

Proposal 41: Oppose

The deer herd is stable in this area

Proposal 42: Oppose

There is no biological reason to further restrict non resident season dates in hard to access areas of the unit.

Proposal 44: Support

There is not currently any limit to the allocation of Non Resident tags that can be issued for this hunt.

I authored this proposal to limit the amount of tags that may be drawn by a Non Resident. This is common practice in every other state in the Union except for Alaska to prioritize Resident hunters in the drawing for coveted big game tags over Non Residents.

Board Of Game Finding 2017-222-BOG states that each hunt will be looked at individually with the last 10 or more years of drawing statistics.

Below is a snapshot of the 2015 drawing statistics vs the 2024 drawing statistics for DG005

2015 Draw DG005/32 Non Resident Applications 0 drawn/ 380 Resident Applications/ 4 tags issued

2024 Draw DG005/41 Non Resident Applications 0 drawn/735 Resident Applications/3 tags issued

Proposal 45: Support

There is not currently any limit to the allocation of Non Resident tags that can be issued for this hunt.

I authored this proposal to limit the amount of tags that may be drawn by a Non Resident. This is common practice in every other state in the Union

Proposal 46: Support

There is not currently any limit to the allocation of Non Resident tags that can be issued for this hunt.

I authored this proposal to limit the amount of tags that may be drawn by a Non Resident. This is common practice in every other state in the Union

Proposal 47: Support

This would incentivize more hunters to harvest bears

Proposal 59: Support

There is not currently any limit to the allocation of Non Resident tags that can be issued for this hunt.

I authored this proposal to limit the amount of tags that may be drawn by a Non Resident. This is common practice in every other state in the Union

Proposal 60: Support

There is not currently any limit to the allocation of Non Resident tags that can be issued for this hunt.

I authored this proposal to limit the amount of tags that may be drawn by a Non Resident. This is common practice in every other state in the Union

Proposal 61: Support

There is not currently any limit to the allocation of Non Resident tags that can be issued for this hunt.

I authored this proposal to limit the amount of tags that may be drawn by a Non Resident. This is common practice in every other state in the Union

Proposal 62: Support

There is not currently any limit to the allocation of Non Resident tags that can be issued for this hunt.

I authored this proposal to limit the amount of tags that may be drawn by a Non Resident. This is common practice in every other state in the Union



Members of the Board of Game,

I am submitting this public comment in **OPPOSITION** to **Proposal 16**. This proposal would modify the migratory bird hunting season in the Southeast Alaska Zone, GMUs 1-4 and delay the start date from September 1 to October 8.

There is a lengthy history involved with the regulation that directs the timing of the Southeast Alaska migratory bird hunting season. In 2008, the BOG adopted a proposal that modified the longstanding season start date of September 1, delaying the opening until September 16. Since that time, the BOG has deliberated on multiple proposals over several cycles that requested a return to the September 1 start date. During the 2019 BOG meeting, after consideration of the range of hunting season preferences throughout the region, the board approved a proposal that re-instated the September 1 start date on an alternating year basis, with an early start on odd-years and September 16 start on even-years. The board also encouraged the Department of Fish and Game to work through the federal flyway council process to secure a split season option for the Southeast Zone, to provide a tool to accommodate the preferences of both early and late season hunters within the region. The department followed through with that recommendation and put forth a proposal in 2023 to set a split season framework. The board adopted that proposal and set our current regulatory hunting season dates (September 1 - November 30 and December 16 - 31), accommodating both early and late-season hunter preferences.

Adoption of Proposal 16 would delay the start date of the Southeast Alaska migratory bird season to October 8, a delay of 38 days based on the current and long-term start date of September 1. This delay would eliminate hunter access to the prime time for hunting migrations of wigeon, green-winged teal, and pintail which move down the outer coast beginning in late August and are most abundant during the month of September. Sandhill cranes are also early migrators, and they have mostly moved through the region by the end of September as well. Also lost by adoption of this proposal is the ability to hunt in the mildest weather and during the longest days of the season, which provide more opportunity to hunt due to the extra daylight available for boating to and from hunting locations on days when favorable tidal conditions occur early in the morning or later in the day.

This proposal requests a change to the season to gain the best opportunity at "harvesting large mature birds in their prime", "harvesting birds for trophy quality", and to provide "guides and outfitters the ability to hunt waterfowl into January creating a new source of income that is not otherwise available" with the current season. This proposal seems driven more towards benefiting guides selling sea duck hunts and non-resident clients adding to their taxidermy collections than to the average Southeast Alaska resident hunter. I appreciate a fully feathered November or December drake in hand as much as the next person and I select drakes from a decoying flock when I can, but that doesn't diminish my appreciation of the opportunities pursuing those lesser plumed early season migrating waterfowl taken in September.

The proposal also suggests that pushing the season into January could add additional days of hunting opportunity for college students that are home on Christmas break. The current late season split hunt period of December 16-31 was promoted largely on providing young hunters additional opportunities while on holiday break. I feel that the potential of a few extra days of hunting for returning college students during the first week of January is not an equitable trade-off for the loss of opportunity that locally residing youth will miss out on if the season is closed September 1 - October 7, a period when the days are long and the weather is much more hospitable for youth hunter participation. In my opinion, extending the open hunting period to January 1 - 22 will result in a decrease in hunter days afield, when



compared to the current season dates, due to the shorter days, harsher weather, and potential for bays and estuaries to be locked up in ice during that period.

This proposal fails to acknowledge public comments and testimony from BOG meetings dating back to 2008 that support early season hunting dates, the work of the BOG during the last two board meetings recognizing differing seasonal preferences throughout the region and their actions to restore traditional early September hunting opportunities, as well as the work by department staff through the flyway council to secure the ability to offer both early and late season opportunities in Southeast Alaska under a split season framework. I ask current board members to consider the long journey we have taken on this issue to satisfy the desires of hunters throughout the region and that you maintain the current season framework with the traditional early season and a late season split. Please do not restrict early season hunting access for residents to provide new opportunities for a few guides and their non-resident clientele by delaying and expanding the season into January. **Do not adopt Proposal 16!**

Respectfully,

Mike Vaughn
Sitka, AK



PC86

Name: Piper Vaughn

Community of Residence: Sitka, Alaska

Comment:

Proposal 16: Oppose

Members of The Board of Game,

I'm writing in opposition of Proposal 16 which would delay the start of the waterfowl season until October 8th. I am a 14 year old duck hunter from Sitka and I have been hunting for 3 seasons now. Duck hunting with my dad is my favorite outdoor activity.

I prefer to hunt in September because the weather is much more enjoyable compared to later in the season. The days are also longer early in the season which allows more daylight to hunt and travel by boat to and from hunting locations. I think wigeon and teal are the best ducks to eat and they are the most plentiful during the month of September. Please maintain the September 1st start date. Thank you!



PC87

Name: Rex Versteeg

Community of Residence: Petersburg AK

Comment:

Proposal 1: Support with Amendment

Don't have time to explain didn't know about this till now running out of time if you want to talk to me my number is [REDACTED]

Proposal 2: Support

Don't have time to explain it running out of time didn't know about this until now. You wanna talk to me about [REDACTED]

Proposal 3: Support

Running out of time no time to explain it

Proposal 4: Support

Running out of time no time to explain it

Proposal 5: Support

Running out of time no time to explain

Proposal 6: Support

Running out of time no time to explain

Proposal 7: Support

Running out of time to submit this no time to explain it

Proposal 8: Support

Running out of time to submit this no time to

Proposal 9: Support

Running out of time to submit this no time to

Proposal 10: Oppose

Running out of time to submit this

Proposal 11: Support

Running out of time to explain this

Proposal 12: Oppose

Running out of time

Proposal 13: Oppose

Running out of time to submit this

Proposal 14: Support

Running out of time to submit this

Proposal 15: Support

Running out of time to submit this

Proposal 16: Support

Running out of time to

Proposal 17: Oppose

Running out of time

Proposal 18: Support

Running out of time to submit this

Proposal 19: Support

Running out of time to submit this

Proposal 20: Support

Running out of time to

Proposal 21: Support

Running out of time to submit

Proposal 22: Support

Running out of time to submit this

Proposal 23: Oppose

Running out of time to submit this

Proposal 24: Oppose

Running out of time to submit this

Proposal 25: Oppose

Running out of time to submit

Proposal 26: Oppose Running out of time to submit this

Proposal 27: Oppose

Running out of time to submit this

Proposal 28: Support

Running out of time to submit this

Proposal 29: Oppose

Running out of time to submit this

Proposal 30: Support

Running out of time to submit this

Proposal 31: Support

Running out of time to submit this

Proposal 32: Support

Running out of time to

Proposal 33: Support

Running out of time to submit this

Proposal 34: Support

Running out of time to submit this

Proposal 35: Support

Running out of time to submit this

Proposal 36: Oppose

Running out of time to submit this

Proposal 37: Support

Running out of time to submit this

Proposal 38: Support

Running out of time to submit this

Proposal 39: Oppose

Running out of time to

Proposal 40: Support

Running out of time to submit this

Proposal 41: Support

Running out of time to submit this

Proposal 42: Support

Running out of time to submit this

Proposal 43: Support

Running out of time to

Proposal 44: Oppose

Running out of time to submit this

Proposal 45: Oppose

Running out of time

Proposal 46: Oppose

Running out of time to submit this

Proposal 47: Oppose

Running out of time to submit this

Proposal 48: Oppose

Running out of time to submit

Proposal 49: Support

Running out of time to submit this

Proposal 50: Support

Running out of time to submit

Proposal 51: Support

Running out of time to submit this

Proposal 52: Support

Running out of time to submit this

Proposal 53: Oppose

Running out of time to submit this

Proposal 54: Oppose

Running out of time to submit this

Proposal 55: Oppose

Running out of time to submit this

Proposal 56: Oppose

Running out of time to submit this

Proposal 57: Support

Running out of time to submit this

Proposal 58: Support

Running out of time to submit this

Proposal 59: Support

Running out of time to submit this

Proposal 60: Support

Running out of time to submit this

Proposal 61: Support

Running out of time to submit

Proposal 62: Support

Running out of time to submit

Proposal 63: Support

Running out of time to

Proposal 64: Support

Running out of

Proposal 65: Support

Running out of time to

Proposal 66: Support

Running out of

Proposal 67: Support

Running out of time to

Proposal 68: Support

Running out of time to

Proposal 69: Support

Running out of time

Proposal 272: Oppose

Running out of time to submit this

Name: Jesse Warren

Community of Residence: Sitka

Comment:

Proposal 1: Oppose

I strongly oppose proposal 1.

I feel it needless to further restrict big game hunters in this climate. All hunters know that big game are the most active in the early morning and late evening.

I grew up in the community of Gustavus.

Unlike other communities in the region, there are no deer, mountain goat or elk,

making moose is our only opportunity to put red meat in the freezer.



PC88

Over the years I have seen many moose ethically taken after sunset as a result of calling and interacting with the bull for most of the day, as well as bulls taken in the early morning light before the moose bed down for the day. The southeast moose hunt is far from a trophy hunt, people are trying to feed their families, and prop 1 would greatly limit the opportunity to do so!

Proposal 2: Oppose

I oppose prop 2. With the ever increasing cost of living in southeast, our residents are extremely subsistence minded, making Sitka blacktail a food staple in almost every community. Deer are extremely nocturnal, making early mornings and evenings the most productive hunting times.

Without question prop 2 would restrict folks ability to put food on the table.



PC89

Name: Abigail Warren

Community of Residence: Sitka

Comment:

Proposal 1: Oppose

I oppose this proposal because with big game such as moose, the hours that they are most active are mornings and evenings, while bedding down mid day. This already limits the active hunting time. While most areas for moose hunting in southeast have many regulations on what a legal bull to harvest is, to then on stack another regulation to limit active hunting time further, makes it just that much more difficult for those who are simply trying to put food in the freezer.

Proposal 2: Oppose

My family and I are commercial fisherman and our fishing season often goes well into the month of September. Which means we miss a lot of the good daylight hunting month of August and most of September. As we all know living in Alaska we get limited daylight in the fall/winter. So for those who are subsistence hunting in the dark months this proposal makes it unnecessarily difficult to hunt and provide food for our family.



Name: Sarah Warren

Community of Residence: Gustavus/Sitka

Comment:

Proposal 1: Oppose

This proposal does not feel necessary for all of SE Alaska. In Gustavus, where motor vehicles are largely prohibited in the hunt, many moose are shot at civil twilight after hours of sitting in a tree stand. Artificial lights from motor vehicles simply aren't a factor. A civil twilight restriction would be a serious detriment to hunters in unit 1C. In addition the term civil twilight may seem to be subject to interpretation, which might make things unnecessarily difficult. If Prince of Wales, with all of their logging roads, feels the need for such a regulation, then let it be limited to their unit.

Proposal 2: Oppose

I feel this regulation is unnecessary in most of SE Alaska and highly restrictive to most hunters. Again, interpretation of civil twilight may pose a problem. If Prince of Wales feels the need for this in their unit, then let it be restricted for them alone.

Proposal 8: Support with Amendment

As it seems that cougar are moving into SE Alaska and considering risk to human lives (I am thinking of the female hiker killed by a cougar last week in Colorado), it seems wise to

Proposal 9: Support

As it seems that mountain lions are moving into SE Alaska, specifically Wrangell, and considering risk to human life (I am thinking of the female hiker killed by a mountain lion recently in Colorado), it seems wise to have regulations in place to aid in helping to protect human populations. While I am not completely sure that the mountain lion numbers actually warrant an open season, I would like to be assured that there will be no penalty to persons killing mountain lions in defense of self, others, or livestock. On a personal note, while mountain lions are truly amazing animals, I for one have enjoyed being able to hike around SE Alaska for over 30 years without having to worry about being stalked by an extremely large cat!

Proposal 37: Oppose

The deer population in unit 2 does not seem to support this proposal.

Proposal 38: Oppose

The deer population in unit 2 does not seem to support this proposal.

Proposal 39: Oppose

The deer population in unit 2 does not seem to support this proposal.

Proposal 58: Support

If the elk population on Zarembo warrants a registration hunt, then I support this proposal.

Proposal 64: General_Comment

I believe our animal populations are large enough that we can afford to divest ourselves of this regulation. It seems unnecessary to have restrictions in these areas , while other areas are not bound by this regulation.

**PC91****Name:** Caleb Warren**Community of Residence:** Gustavus**Comment:****Proposal 1: Oppose**

I disagree because in the early to midseason, there is hours of daylight after sunset. And Moose, as we know, rest in the forest during the day and then the evening come out to feed this would make an already difficult hunt much more difficult.

Proposal 2: Oppose

In early to midseason there is hours of daylight after sunset. Deer, as we know, feed all night when it's brighter out and during these months, it never gets very dark. So they rest most of the day, I have come across many deer be down during the day. They come out in the evening by and large to feed. This would greatly inhibit the harvest of deer. ADF&G put out a statement I believe stating hunters have 0% affect on the deer population on Baranof Island. And so I would be willing to bet that the adjacent islands are similar. I believe this proposal is to combat poachers. I don't believe removing hours of huntable daylight will stop posters. Poachers don't poach because you can't see them poachers poach because you can't hear them because there's vast amounts of territory Unsupervised. Inadvertently removing daylight shooting time will make more poachers. Many hunters do not carry a watch. Perhaps they forgot their phone or it's dead. They see a deer plenty of daylight to make a safe and accurate shot and they shoot deer. But since there would be a sunset requirement, they are now labeled as illegal poachers. I see this as turning honest hunters, providing for the families into lawbreakers.

Proposal 4: Oppose

It is very difficult to know whether or not you've hit a goat.

Proposal 5: Support

I am in favor of this because someone who has legally taken a brown bear. Might have to shoot one the next year and self-defense. If you were only able to bag one once every four years and this is very tempting to roll it into the bushes and not claim a DNR and surrender the hide. If you can harvest one every year, they would be a lot more apt. to report and keep the hide.

Proposal 12: Oppose

Most every other state uses night vision to harvest for bears I don't see why Alaska has to be different.

Proposal 13: Oppose

Most every other state uses night vision to harvest for bears I don't see why Alaska has to be different.

Proposal 19: Support

There are many fisherman and tradesman who's schedules do not align with the opening or closures of the brown bear hunts a longer season would be more opportunity for these individuals to get the hunt.

Proposal 20: Support

There are many fisherman and tradesman who's schedules do not align with the opening or closures of the brown bear hunts a longer season would be more opportunity for these individuals to get the hunt.

Proposal 21: Support

There are many fisherman and tradesman who's schedules do not align with the opening or closures of the brown bear hunts a longer season would be more opportunity for these individuals to get the hunt.

Proposal 22: Support

There are many fisherman and tradesman who's schedules do not align with the opening or closures of the brown bear hunts a longer season would be more opportunity for these individuals to get the hunt.

Proposal 26: Oppose By adding this restriction is adding the temptation for any individual who shoots a nanny to roll it off the cliff and not report, but keep hunting for a billy. In which more goats will be taken.

Proposal 29: Oppose

An individual who shoots a spike as an individual in need of meat and not of a trophy. There are many individuals who only get weekends off, but that need to fill their freezer and feed their families.

Proposal 33: Support

There are many fisherman and tradesman who's schedules do not align with the opening or closures of the brown bear hunts a longer season would be more opportunity for these individuals to get the hunt.

Proposal 37: Oppose

There is enough deer around there's no need to reduce the bag limit.

Proposal 38: Oppose

There is enough gear around. I don't see any reason to reduce the bag limit.

Proposal 39: Oppose

There is enough deer around I don't see the need to reduce the bag limit.

Proposal 40: Oppose

There is enough deer around. I do not see the need to reduce the bag limit.

Proposal 41: Oppose

There is enough deer around. I did not see the need to reduce the bag limit. Also, reducing the nonresident limit would reduce the revenue earned by Adf&g.

Proposal 42: Oppose

Unnecessary changes I think.

Proposal 43: Support

This will allow individuals who are harvesting meat for their families more opportunity.

Proposal 44: Support

I feel the majority of Nanny's taken are by non-residence reducing the limit of tags given to non-residence would allow a longer season for residence.

Proposal 45: Support

I feel the majority of Nanny's taken are by non-residence reducing the limit of tags given to non-residence would allow a longer season for residence.

Proposal 46: Support

I feel the majority of Nanny's taken are by non-residence reducing the limit of tags given to non-residence would allow a longer season for residence.

Proposal 55: Oppose

Most every other state uses night vision to harvest for bears I don't see why Alaska needs to be different.

Proposal 56: Oppose

Most every other state uses night vision to harvest for bears I don't see why Alaska needs to be different.

Proposal 57: Support

I would like to see an easier and longer hunt for Zarembo.

Proposal 58: Support

I would like to see an easier and longer hunt for Zarembo.

Proposal 59: Support

Hunting Elk is already a very difficult hunt in later season, in which they were treated to a very difficult part of the island to hunt. I would like to see more tags given to residence in the higher chance of success.

Proposal 60: Support

Hunting Elk is already a very difficult hunt in later season, in which they were treated to a very difficult part of the island to hunt. I would like to see more tags given to residence in the higher chance of success.

Proposal 61: Support

Hunting Elk is already a very difficult hunt in later season, in which they were treated to a very difficult part of the island to hunt. I would like to see more tags given to residence in the higher chance of success.

Proposal 62: Support

Hunting Elk is already a very difficult hunt in later season, in which they were treated to a very difficult part of the island to hunt. I would like to see more tags given to residence in the higher chance of success.

Proposal 63: Support

This would a lot more opportunity for harvest.

Proposal 64: Oppose

it is very difficult to determine in the field if it's broomed, broken or a spike/fork, I don't see a reason to make it more difficult on hunters.

Proposal 65: Support

This would allow for more success.

Proposal 66: Support

This would limit the temptation to shoot a bear and roll into the bushes and not have to claim a DNR and surrender the hide. People would be more apt to tag and keep the hide.



PC92

Name: Jon Wendel

Community of Residence: Juneau

Comment:

Proposal 5: Support

There are way too many bears.

Proposal 6: Support

Predation control is an important part of resource management.

Proposal 7: Support

Predation control is an important part of resource management.

Proposal 8: Support

Predation control is an important part of resource management.

Proposal 9: Support

Predation control is an important part of resource management.

Proposal 10: Support

There is no clear reason to require this.

Proposal 11: Support

Allow for people's livelihoods.

Proposal 13: Support

Limit people wanting to shoot deer. There's no reason.

Proposal 14: Support

Allow for people's livelihoods.

Proposal 15: Support

Allow for people's livelihoods.

Proposal 19: Support

There are way too many bears.

Proposal 20: Support

There are way too many bears.

Proposal 21: Support

There are way too many bears.

Proposal 22: Support

There are way too many bears.

Proposal 23: Support

Nonresident harvest makes up a small portion of the deer harvested and brings in significant revenue. Allow it.

Proposal 26: Support Punishment seems appropriate.

Proposal 27: Oppose

I am an avid hunter and outdoorsman and primarily hunt Admiralty Island due to having boat access. I also know many hunters who do not own boats and are therefore limited to hunting opportunities on the mainland or Douglas Island.

Douglas Island provides a unique and important opportunity for both inexperienced and seasoned hunters. For new hunters, it is often the most accessible place to learn to hunt deer and have a realistic chance of success. For experienced hunters, Douglas offers a viable alternative when weather or sea conditions make access to Admiralty or other areas unsafe. The ability to harvest a single doe provides additional opportunity while still maintaining appropriate conservation limits.

Hunters who choose to harvest only bucks already have that option under current regulations. Mandating a buck-only harvest through regulation is unnecessary and removes flexibility that currently exists without providing a demonstrated biological benefit.

Deer populations on Douglas Island are healthy, and for many residents it is the only practical place they can hunt. ADF&G has already implemented measures to prevent overharvest of does by limiting the harvest to one doe per hunter. There is no indication that additional restrictions are needed at this time. Current regulations already strike a reasonable balance between conservation and opportunity.

The proposal itself is not well thought out, and the narrative in the section titled “What is the issue you would like the board to address and why?” contains internal inconsistencies. For example, it states: “Restricting the harvest to does only, identical to the sound policy of the adjacent mainland, will ensure the opportunity for more reproduction, and maturing of doe fawns to mating maturity, while still allowing for reasonable local harvest opportunity.” This language directly contradicts the proposed regulatory change and reflects a lack of clarity in the proposal’s justification.

For these reasons, I oppose Proposal 28. No change is necessary.

Proposal 28: Oppose

All comments regarding Proposal 27 apply to 28 and are repeated here.

I am an avid hunter and outdoorsman and primarily hunt Admiralty Island due to having boat access. I also know many hunters who do not own boats and are therefore limited to hunting opportunities on the mainland or Douglas Island.

Douglas Island provides a unique and important opportunity for both inexperienced and seasoned hunters. For new hunters, it is often the most accessible place to learn to hunt deer and have a realistic chance of success. For experienced hunters, Douglas offers a viable alternative when weather or sea conditions make access to Admiralty or other areas unsafe. The ability to harvest a single doe provides additional opportunity while still maintaining appropriate conservation limits.

Hunters who choose to harvest only bucks already have that option under current regulations. Mandating a buck-only harvest through regulation is unnecessary and removes flexibility that currently exists without providing a demonstrated biological benefit.

Deer populations on Douglas Island are healthy, and for many residents it is the only practical place they can hunt. ADF&G has already implemented measures to prevent overharvest of does by limiting the harvest to one doe per hunter. There is no indication that additional restrictions are needed at this time. Current regulations already strike a reasonable balance between conservation and opportunity.

The proposal itself is not well thought out, and the narrative in the section titled “What is the issue you would like the board to address and why?” contains internal inconsistencies. For example, it states: “Restricting the harvest to does only, identical to the sound policy of the adjacent mainland, will ensure the opportunity for more reproduction, and maturing of doe fawns to mating maturity, while still allowing for reasonable local harvest opportunity.” This language directly contradicts the proposed regulatory change and reflects a lack of clarity in the proposal’s justification.

For these reasons, I oppose Proposal 28. No change is necessary.

Proposal 29: Oppose

I am an avid hunter and outdoorsman with experience hunting Southeast Alaska. I am opposed to Proposal 29.

Adding antler restrictions significantly complicates deer hunting regulations and creates unnecessary confusion, especially for new and occasional hunters. Antler point or spread requirements sound simple on paper, but in practice they are difficult to judge accurately in the field, particularly in dense Southeast forest conditions where visibility is often extremely limited and animals are often moving. In my experience, many bucks are shot only knowing that they have antlers, without a clear depiction of what those antlers look like, as they are often shrouded by vegetation or other visibility limiting factors (even such things as moisture on a scope, which might not affect shot placement, may affect the shooters ability to notice small details at a distance – not all deer are shot at 20 yards, broadside, in a muskeg, with the sun shining).

ADF&G already has an example of this complexity with moose regulations that require bulls to be 50 inches or have a minimum number of brow tines or full curl requirements. Even experienced hunters routinely struggle to confidently judge legality in the field, which leads to mistaken harvests, increased

enforcement issues, and hunters choosing not to participate at all for fear of making an honest mistake. Applying a similar regulatory approach to deer hunting introduces the same problems without clear biological benefit.

Douglas Island already provides a controlled and balanced hunting opportunity. Current regulations allow limited doe harvest while still protecting population health, and ADF&G has demonstrated the ability to adjust seasons and bag limits when necessary. There is no evidence that antler restrictions are needed to meet management objectives, nor that they would improve herd health beyond existing measures. In deer populations, reproduction is almost entirely limited by the number of adult does, not by the number of bucks. A single buck can breed multiple does during the rut, and in most herds there are far more bucks than are biologically necessary to impregnate every receptive doe. As long as buck numbers stay above a very low threshold, pregnancy rates in does remain high. This is why wildlife biologists often say deer populations are “doe-limited,” not buck-limited. Older bucks and larger antlers are a social or hunter-preference outcome rather than a conservation necessity. As the proposer is a hunting guide, this proposal is obviously self-serving and carries no conservation value.

Antler restrictions disproportionately impact new hunters and those with limited access or experience. Douglas Island is often where people learn to hunt, where weather conditions allow access when Admiralty or other areas are unsafe, and where participation should be encouraged, not complicated. Adding subjective antler requirements increases the likelihood of unintentional violations and discourages participation in hunting altogether.

This proposal adds regulatory complexity without solving a demonstrated problem. Existing regulations already strike an appropriate balance between opportunity and conservation, and no change is necessary.

Proposal 31: Support

There are way too many bears.

Proposal 32: Support

There are way too many bears.

Proposal 33: Support

There are way too many bears.

Proposal 47: Support

There are way too many bears.

Proposal 48: Oppose

There are way too many wolves.

Proposal 50: Support

There are way too many wolves.

Proposal 51: Support

There are way too many wolves.

Proposal 52: Support

There are way too many wolves.

Proposal 53: Support

There are way too many wolves.

Proposal 54: Support

Seems fair.

Proposal 57: Support

Allow for more hunting opportunities.

Proposal 58: Support

Allow for more hunting opportunities.

Proposal 59: Support

Allow for more hunting opportunities.

Proposal 62: Support

Allow for more resident hunting opportunities.

Proposal 63: Support

Allow for more resident hunting opportunities.



PC93

Name: Barrett Weston

Community of Residence: Juneau

Comment:

Proposal 6: Support

With increases in deer survival following successive mild winters, we can expect an increase of wolf populations across southeast. Extending wolf trapping seasons will allow residents to manage wolf numbers to prevent an impact to deer abundance. Thank yo

Proposal 7: Support

With increases in deer survival following successive mild winters, we can expect an increase of wolf populations across southeast. Extending wolf trapping seasons will allow residents to manage wolf numbers to prevent an impact to deer abundance. Thank yo

Proposal 8: Support with Amendment

Treat cougars the same way the department regulates migratory deer. Open season, unregulated , until any trends become more prevalent. Thank you!

Proposal 9: Support with Amendment

Treat cougars the same way the department regulates migratory deer. Open season, unregulated , until any trends become more prevalent.

Proposal 16: Oppose

Early season opportunities for waterfowl are some of the best for those hunting to eat ducks, geese and cranes. Shifting season dates to improve opportunities for taxidermy is directly opposed to subsistent resident opportunities. Most puddle ducks and ge

Proposal 21: Oppose

Bears on admiralty are earlier to rise than most mainland bears. Extending the season will only result in the shooting of more sows and more immature bears. Thank you!

Proposal 22: Oppose

Bears on admiralty are earlier to rise than most mainland bears. Extending the season will only result in the shooting of more sows and more immature bears. Thank you!

Proposal 23: Oppose

Alaska, across the board, is at a tipping point of undervaluing a lot of resources and it seems like nonresidents are taking advantage of opportunities here that have been romanticized on social media rather than working for it in their home states. I would love to hunt Idaho or Montana but I don't have the time or money. I don't think it should be easier to get more tags in Alaska when other states with similar or higher deer numbers have more restriction to nonresidents. Two deer for a nonresident that can afford to travel to hunt is more than sufficient. The data presented for nonresident hunting averages is misleading because data from the last two decades has been influenced by both wolf populations and harsh winters. An abundance of deer in the present day is no reason to compromise it with no additional revenue gained by the state to support wildlife management. By wildlife management, I mean management to promote and protect the opportunities of residents aligned with and committed to sustaining the environment and community that we rely on year in and year out to survive here. Thank you!

Proposal 27: Oppose

Deer populations on Douglas do not indicate any need for changes in bag limits. Thank you!

Proposal 28: Oppose

Deer populations on Douglas do not indicate any need for changes in bag limits. Thank you!

Proposal 29: Oppose

Antler restrictions in southern states have yielded little to no improvement or impact on deer abundance. Ethics are more important than regulatory changes. Require additional hunter education, if nothing else. Thank you!



Name: Phillip White

Community of Residence: Juneau

Comment:

Proposal 1: Oppose

It's BS to propose laws that only affect certain regions for safety. If it's so damn important then impose it on the entire state. Also, we can see animals safely we should be able to shoot them regardless of what "civil" means.

Proposal 2: Oppose

It's BS to propose laws that only affect certain regions for safety. If it's so damn important then impose it on the entire state. Also, we can see animals safely we should be able to shoot them regardless of what "civil" means.

Proposal 3: Support

Everyone already does this. Who cares

Proposal 4: Oppose

don't make use use metal locking tags on goats

Proposal 5: Support

There are a butt load of brownies. they are dangerous and kill everything, and eating them stinks.

Proposal 6: General_Comment

no position

Proposal 7: General_Comment

no posiion

Proposal 8: Support

we have enough predators already.

Proposal 9: Support

y not

Proposal 10: Support

sealing is BS

Proposal 11: Support

Everyone already does this, you're just making what people do legal

Proposal 12: Oppose

Night vision rocks

Proposal 13: Oppose

Night vision rocks

Proposal 14: General_Comment

idk what that is

Proposal 15: General_Comment

idk what that is

Proposal 16: General_Comment

idk what that is

Proposal 17: Oppose

theres millions of them

Proposal 18: Support

sure

Proposal 19: Support

kill the brown bears

Proposal 20: General_Comment

k

Proposal 21: General_Comment

k

Proposal 22: Support

kill the brown bears

Proposal 23: Oppose

Screw non alaskans, Its BS wed even allow them to come here in the first place.

Proposal 24: General_Comment

what

Proposal 25: General_Comment

what

Proposal 26: General_Comment dunno

Proposal 27: Support

helping the population would be good

Proposal 28: Oppose

there are enough deer on that island to kill lots of bucks

Proposal 29: Oppose

that will lead to people shooting spikes and not bringing them home. thats a r [REDACTED] d idea, who thought of that? fire them.

Proposal 30: Oppose

screw handicapped people. they get all the good parking.

Proposal 31: Support

kill more bears

Proposal 32: Support

kill more brownies

Proposal 33: Support

kill more brownies

Proposal 34: Support

y not, it's legit

Proposal 35: Support

ik

Proposal 36: Oppose

y

Proposal 37: Oppose

there are tons of deer

Proposal 38: Oppose

there are tons of deer

Proposal 39: Oppose

there are tons of deer

Proposal 40: Oppose

there are tons of deer

Proposal 41: Oppose

there are tons of deer

Proposal 42: Support

screw non residents

Proposal 43: Support with Amendment

screw over non residents

Proposal 44: Support with Amendment

Up to 0%, why are we letting them shoot our animals

Proposal 45: Support with Amendment

Up to 0%, why are we letting them shoot our animals

Proposal 46: Support with Amendment

Up to 0%, why are we letting them shoot our animals

Proposal 47: Support

all bears dont' taste good, make life easier for hunters

Proposal 48: Oppose

kill all wolves

Proposal 49: General_Comment

kill all wolves

Proposal 50: General_Comment

kill all wolves

Proposal 51: Support

kill all wolves

Proposal 52: Oppose

kill all wolves

Proposal 53: Oppose

kill all wolves

Proposal 54: Oppose

kill all wolves

Proposal 55: Oppose

night vision rocks

Proposal 56: Oppose

night vision rocks

Proposal 57: Support

that would be sick

Proposal 58: Support

iodk what that is but we need more permits

Proposal 59: Support with Amendment

make it 0%, screw non alaskans

Proposal 60: Support with Amendment

make it 0%, screw non alaskans

Proposal 61: Support with Amendment

make it 0%, screw non alaskans

Proposal 62: Support with Amendment

make it 0%, screw non alaskans

Proposal 63: Support with Amendment

make it 0%, screw non alaskans

Proposal 64: Oppose

y

Proposal 65: Support

antler restrictions blow

Proposal 66: Support
kill all brownies

Proposal 67: Support
y not

Proposal 68: Support
y not

Proposal 69: Support
y not



PC95

Name: Ken Wilkinson

Community of Residence: Sitka

Comment:

Proposal 16: Oppose

Dear Board of Game Members,

I oppose Proposal 16.

As an Alaska resident, I have concern for added effort on Sea Ducks if a later season is imposed. Changing season start dates from September 1st to October 8th will eliminate access to large flocks of early migrating game birds such as, but not limited to, Teal, Wigeon, Pintails, Northern Shovelers, and Sandhill Cranes. Therefore, having a later season start date will eliminate the majority of opportunity to harvest these early migrating birds. Loss of early hunting opportunity could reallocate hunting pressure upon residential, overwintering populations of Sea Ducks in Units 1-5. With the current season, substantial pressure is already imposed on the Sea Ducks. A later season will potentially add pressure, and lead to the over harvest of Scoters, Golden Eyes, Merganzers, Harlequin, and Long-tailed ducks.



PC96

Name: Monique Wilkinson

Community of Residence: Sitka

Comment:

Proposal 16: Oppose

Dear Board of Game Members,

I oppose Proposal 16.

This proposal would shift the hunting season dates for migratory birds and waterfowl in Units 1-5 from the current season of September 1st through December 31st to the new dates of October 8th through January 22nd.

My family and I are avid hunters of migratory and waterfowl birds in Unit 4, during the month of September. Some of the species of early season migrating birds we target are Northern Shoveler, American & European Wigeon, Northern Pintails, Teal, Sandhill Cranes, and non-residing migratory Geese. Changing the season dates would eliminate our hunting opportunity for these early migrating species in Unit 4 during September.



PC97

Name: Roland Wirth

Community of Residence: Sitka

Comment:

Proposal 1: Support

Proposal 2: Support

Yep

Proposal 3: Support

Yep

Proposal 23: Oppose

I strongly oppose the increase in bag limits for non resident hunters of deer in unit 4. As a lifelong Sitka I have depended on deer to feed my family and have found that the warming climate and higher snow line elevations (as well as getting older) has made it more difficult to fill our freezer in recent years. I can see no value in bringing out of state hunters into our area to kill our deer at a higher rate. We qualify as a subsistence hunting area in part because of our remoteness and high food costs. Let's not increase competition for one of the most affordable sources of good protein which we already compete for with our neighbors. In addition, it appears that deer populations in Sitka area may currently be facing one of there tougher winters in recent times. Is the ADFG prepared to reduce bag limits for non residents when we experience hard winters? I ask that you continue to respect the intentions of sport and subsistence deer hunting in Sitka area by prioritizing the protection of a good nutritional food source for local consumption.



PC98

Name: David Woolley

Community of Residence: Petersburg

Comment:

Proposal 5: Support

The brown bear population is rapidly increasing and without any nonresident hunters, there's not very many people hunting them. I feel with the way it is right now and the effect they're having on things that the few people that do hunt them should be allowed to harvest one a year for now.

Proposal 40: Support

With the rise in wolf population and hunting pressure, I feel the deer population is already on a decline. There's no reason for a nonresident to receive that many tags here.

Proposal 48: Support

The Wolf population is getting out of hand in unit two

Proposal 51: Support

Something needs to be done to put the wolf population in check

Proposal 66: Support

The brown bear population is steadily increasing and affecting other populations without the non-residence hunting here. I feel like it should be up to the locals to keep them in check.

Proposal 67: Support

This is one of the most densely populated areas on the island with more deer being hit on the road system than anywhere, and it is further away from town and residence

Proposal 68: Support

This is a densely populated area with a large amount of deer being hit on the roadways and it's further away from town and residence



PC99

Name: Robert Woolsey

Community of Residence: Sitka

Comment:

Proposal 23: Oppose

The Department's assumption that the past decade of mild winters has contributed to a robust deer population in Unit 4 is absolutely correct. But so is the likelihood that the population has suffered significant mortality from this year's winter of record cold and snow. As of January 8, 2026, the caretaker at Baranof Wilderness Lodge, on the eastern side of Baranof Island, reported 12 feet of snow on the ground. To base future population numbers on past weather trends is a management decision you might make at a roulette table that's dropped black ten times in a row, and surely will again. My family and I have benefited from Unit 4's relatively abundant deer for 39 years. The board should be

aware that while the deer are historically abundant, places to hunt them are not. Safe anchorages with access to suitable terrain are surprisingly few. Picture running 50 miles to Hoonah Sound in an 18-foot Boston Whaler and finding a charter boat with a guided hunting party anchored in Patterson Bay. So you turn back for Rodman, Bay and there's another big cruiser anchored there. The Department states that nonresident interest in hunting deer is low because of difficult access: a challenge resident hunters confront every time they go out. Increasing nonresident effort in Unit 4 strikes me as one more barrier to success for resident hunters who've come to rely on deer as a primary food source.

Thank you,

Robert Woolsey

Sitka, Alaska



PC100

Name: Ronald Wynes

Community of Residence: California

Comment:

The fishing quotas for the southeast region should not be dictated by Sitka area counts. Restricting ling cod and King salmon for all of southeast area is unreasonable. These restrictions are making it difficult to justify costs for sportsmen to pay to fish in area 2C.

Proposal 1: Support

Proposal 12: Support

Unfair advantage to the hunter

Proposal 13: Support

Unfair Hunter advantage

Proposal 30: Support

Every effort should be made to support disabled sportsmen

Proposal 55: Support

Night vision and drones should be banned

Proposal 56: Support

Same as above
