WP26-06/-07 Executive Summary	
General Description	Wildlife Proposal WP26-06 requests eliminating the Federal doe hunt in Unit 2. *Submitted by: East Prince of Wales Fish and Game Advisory Committee* Wildlife Proposal WP26-07 also requests eliminating the Federal doe hunt in Unit 2. *Submitted by: Klawock Fish and Game Advisory Committee*
Proposed Regulation	*5 **bucks** ~~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~~.* *Jul. 24 – Jan. 31* *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.*
OSM Preliminary Conclusion	**Oppose** WP26-06/-07
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**1 Support**; **1 Oppose** Please see the Written Public Comments on Wildlife Proposals and Closure Reviews section of the meeting book or www.doi.gov/subsistence/wildlife/public_comments for full comments.

Draft Wildlife Analysis
WP26-06/07

ISSUE

Wildlife Proposal WP26-06, submitted by the East Prince of Wales Fish and Game Advisory Committee (East POW AC), requests eliminating the Federal doe hunt in Unit 2. Wildlife Proposal WP26-07, submitted by the Klawock Fish and Game Advisory Committee (Klawock AC), also requests eliminating the Federal doe hunt in Unit 2. These proposals are being analyzed together because they the same.

Proponent statement

The East POW AC notes that deer populations on Prince of Wales Island (POWI) are declining due to the increase in dense second growth forests, predation by wolves and bears, and illegal harvest of deer. Hunters are seeing fewer deer, and the number of days required to harvest a deer has increased. They state that the doe harvest has an outsized impact on the deer population, as removing a doe not only removes the individual, but its potential future offspring. The proponent notes that with the recent Board decision to recognize Ketchikan as a rural community, the number of federally qualified subsistence users hunting in Unit 2 will increase, which will further increase pressure on the Unit 2 deer population.

The Klawock AC states that the deer population has crashed on POWI, due mainly to an increase in the wolf population from 2015 to 2019. The proponent notes that changes in wolf management due to Endangered Species Act listing petitions reduced the harvest of wolves, leading to increased deer predation. The proponent argues that the elimination of the doe harvest will help the deer population recover, and that every doe is invaluable until the herd recovers.

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.	*Jul. 24 – Jan. 31*
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Non-federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.

Proposed Federal Regulations

Unit 2 - Deer

5 ***bucks*** ~~*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*~~*.*	*Jul. 24 – Jan. 31*

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.

Current State Regulations

Unit 2 - Deer

Residents and Nonresidents:	*4 Bucks*	*HT*	*Aug. 1 – Dec. 31*

Same-day airborne hunting of deer allowed. Harvest tickets must be validated in sequential order, and unused tickets must be carried when you hunt. In all hunts limited to one sex, evidence of sex must remain naturally attached to the meat or antlers must remain naturally attached to the entire carcass, with or without viscera.

Extent of Federal Public Lands

Unit 2 is made up of approximately 78% Federal public lands, all of which are U.S. Forest Service (USFS) managed lands except for that portion of the Alaska Maritime National Wildlife Refuge located on Forrester Island (0.1%).

Customary and Traditional Use Determination

Rural residents of Units 1, 2, 3, 4 and 5 have a customary and traditional use determination for deer in Unit 2.

Regulatory History

See staff analysis for WP26-03/-04/-05 for a comprehensive regulatory history for deer in Unit 2.

The first Federal regulation allowing for the legal harvest of female deer in Unit 2 was in 1995. Proposal P95-01 allowed for the harvest of one antlerless deer, with a season of Oct. 15 - Dec. 31. Since then, Federal regulations have provided for the harvest of one female or antlerless deer, with a season of October 15 to the end of the hunting season. This regulatory change was followed by several proposals submitted from 1997 to 2001 (P97-07, P98-09, P98-10, P98-11, P98-12, P00-05, and P01-03) requesting to reduce or rescind the antlerless deer season and/or reduce the length of the antlered deer season in Unit 2 due to conservation concerns. These proposals were all rejected by the Board.

Under State regulations, antlerless deer hunting, with date restrictions, was allowed from 1970 through 1977. Only antlered deer have been allowed to be harvested under State regulations since 1978, except for a controversial provision for the harvest of one antlerless deer in 1987, with a season of Oct.10 – 31 (ADF&G 1992).

In February 2025, the Federal Subsistence Board (Board) adopted Proposal NDP25-01, changing Ketchikan's status to a rural community. Ketchikan residents officially became rural, federally qualified subsistence user(s) (FQSUs) with a customary and traditional use determination for deer in Unit 2 upon the publication of the new Federal subsistence regulations in the Federal Register in July 2025.

Current Events

Please see the staff analysis for WP26-03/-04/-05 for a full description of current events related to Unit 2 deer, including summaries of the public hearing, Tribal consultation, Board decision on recent special action requests regarding Unit 2 deer (WSA25-01/-03 and WSA25-02), and recently submitted requests for reconsideration on the Ketchikan rural determination (NDP25-01).

Biological Background

See staff analysis for WP26-03/04/05 for general biological information on the Unit 2 deer population.

The number of breeding females in a deer population is widely thought to determine the reproductive capacity of the population, and therefore it is generally thought that harvesting of does will lead to a lower abundance of deer in the future. As such, restricting harvest of females is a commonly used tool to conserve populations. As the East POW AC noted in WP26-06, "…removing one doe not only

removes the individual, but the doe's potential offspring. In this way, doe harvest creates an outsized impact on the deer population."

However, research indicates that the overall abundance and productivity of deer in Unit 2 is determined by a complex combination of factors including habitat quality (Kirchoff and Schoen 1987, Gilbert et. al. 2017, Yeo and Peek 1992), predation, (Person et. al. 1996, Gilbert 2015), winter severity (Schoen and Kirchoff 1985, Schoen and Kirchoff 1990), and harvest rates. Thus, the effect of doe harvest on deer abundance in Unit 2 is not straightforward, and depends on the complex interplay of habitat quality, predation, weather, and harvest.

Throughout POWI, decades of commercial logging have created a mosaic of various-aged timber stands, along with an extensive network of roads built to support logging operations (Brinkman et. al 2009). POWI has sustained the highest rates of logging in the region (Albert and Schoen 2007). Although northern POWI contained only 10.9% of all productive forests in the region, it received 37.8% of all logging activity in the Southeast Region (Albert and Schoen 2013). Subsequently, northern POWI has been estimated to have only 62% of its original winter habitat value for blacktail deer (Albert and Schoen 2007).

While recent clearcuts can provide improved forage for deer for several years following logging (Gregovich et. al 2024), the former clearcuts on POWI are increasingly entering the stem exclusion stage of regrowth, which provides poor habitat for deer, and therefore, significantly reduces the carrying capacity for deer in these areas (Hasbrouck 2023, Gilbert 2015). Approximately 1500 km^2 of forest on POWI is expected to enter the stem exclusion stage over the next 20 years, representing about one-third of the old growth available before industrial logging (Roffler et. al 2018). Consequently, the population and productivity of deer in Unit 2 is expected to continue to decline for the foreseeable future (Gilbert et. al 2016).

Brinkman et. al (2011) used fecal pellet DNA-based density estimates to estimate the density of deer in unlogged, recently clearcut, and second growth stands on POWI. Deer density estimates were consistently lowest in second growth stands reaching stem exclusion, but similar in unlogged and recently clearcut stands. Over the course of the three-year study, deer densities declined by 30%, which was attributed to three consecutive severe winters. Habitat characteristics such as stand age, patch size, and topography have been found to play a significant role in deer mortality (Farmer et. al 2006). Clearcuts and post-disturbance forest generally increase the risk of death for all sex and age groups of deer, with larger scale features like topography playing a larger role for adult and yearling females. Farmer et al. (2006) report that dense clearcuts (19-28 years old) increased the risk of mortality by 341%, likely due to reduced visibility and lack of forage. For adult male deer, hunting was found to be the largest source of mortality, and it was strongly associated with use of roads.

Despite a small reported harvest of does in Unit 2 (See Harvest History), radio collar studies suggest that hunting is a significant cause of mortality for female deer in Unit 2. In a study of environmental factors affecting deer survival on central POWI, Gilbert (2015) captured and radio-collared 63 adult female deer between 2010 and 2012. Survival of the radio-collared deer was high (90%) and varied

little among years. The largest source of mortality was hunting (3 deer), followed by malnutrition (2 deer) and black bear predation (1 deer). None of the radio collared deer were killed by wolves, though the study took place during a period of low wolf abundance on POWI. A similar study (Farmer et. al. 2006) conducted between 1996 and 1999 on Heceta Island, adjacent to POWI, examined the influence of habitat use on deer mortality. Over the course of the study, 49 adult and yearling females were successfully captured and monitored. Of these, 10 were killed by wolves, three of which were severely malnourished at the time of death. All ten of these deer were killed by wolves following a moderately severe winter. Four more of the monitored females were illegally killed by hunters, though no female deer were harvested during the legal Federal antlerless deer season in place at the time. These results suggest that while overall mortality of adult females is low, legal and illegal hunting is a significant source of mortality in female deer in Unit 2.

Predation is frequently reported by Unit 2 residents as a driving factor in Unit 2 deer population dynamics. Black bears are known to target young fawns during the birthing season (Gilbert 2015). Unit 2 residents have also reported that deer abundance typically decreases as the density of wolves increases (SERAC 2025). A comprehensive review of predator-prey dynamics in deer populations (Ballard et al. 2001) found that deer density in relation to the habitat carrying capacity was the key consideration in whether predation is a limiting factor in deer populations. For deer populations near carrying capacity, predation mortality is compensatory – that is, it reduces mortality from other reasons so that overall mortality does not change. If predation is reduced, other mortality factors such as malnutrition will likely replace it.

Maintaining an optimum sex ratio is a common goal of wildlife management. The only available sex ratios for Unit 2 deer come from unpublished data from DNA based analysis of fecal pellets conducted in limited areas of POWI in 2006-2008, 2019-2021, and 2023. The average ratio for both the 2006-2008 timeframe (n = 760 deer) and the 2019-2023 timeframe (n = 146 deer) was 33 bucks:100 does. For reference, Chichagof Island had a ratio of 50 bucks:100 does in 2016 (n = 142 deer) (Brinkman 2025, pers. comm.). Despite the lower buck:doe ratio on POWI, pregnancy rates remain high (Gilbert et al. 2020). Gilbert and colleagues (2020) found that pregnancy rates in central POWI deer averaged 89% across three years. However, the summer survival rates of fawns averaged only 41%, largely due to predation by black bears (Gilbert et al. 2020). The mortality rate of fawns due to black bears averaged 46%, with 11% due to other causes (Gilbert et al. 2020).

Cultural Knowledge and Traditional Practices

Please see staff analysis of WP26-03/-04/-05 for more general information on cultural knowledge and traditional practices regarding deer in Unit 2/POWI.

In their discussion of this special action request, the Southeast Council described the customary and traditional role of doe harvest in Unit 2 communities, as well as its importance in providing food security. Council member Michael Douville, a lifelong Unit 2 resident, described the traditional importance of the doe harvest in explaining why he did not support the request (SERAC 2025: 41):

> I would rather give up a buck than to give up the doe hunt. My Grandpa Ralph would specifically request, and the old timers, grandson, I want the doe meat. To me, it's all part of the mix of -- since I was a kid. You harvested what was -- what you could at the time, whether it was a buck or a doe. Those are, you know, most people don't take them. I mean, the last year, or 2023, it says only 32 were taken. That's a really small number compared to 1,600 bucks. Even if it was three times that for not good reporting, it would still be insignificant. And I think that would be a hardship on some people because they're not good hunters, like as a young kid, we got mostly those because we weren't good enough or smart enough to get bucks, and that was perfectly acceptable all my life. I haven't shot one in many, many years. But I don't think that opportunity should be taken away. I don't know, for those reasons, I will not support this proposal. I think it's an undue hardship, and it will take away an opportunity that a few people still use, not that many, but I think it's important.

Similarly, Council member Patricia Philips discussed how the doe harvest helps with food security (SERAC 2025:42):

> …having sat on this Regional Advisory Council for, I think, 30 years, and then heard all different types of testimony related to doe harvest on Prince of Wales Island, and -- what really stands out to me is like a member of Prince of Wales community saying that I'm food insecure, and they didn't say food insecure. I don't have enough food. If I see a deer, it doesn't matter to me whether it's a buck or a doe. I'm going to shoot it because I need to feed my family. I got to share with my elders. It's like Mike was saying, it's customary and traditional, if -- that they have such limited resources for traditional foods on Prince of Wales Island that I'm not going to take something that they could harvest.

The Council also discussed the pressures facing the Unit 2 deer population, and the potential effectiveness of the doe closure to help conserve the population. Michael Douville pointed out that the harvest of does was limited, and that predation was a major factor in the deer population (SERAC 2025: 43):

> So, what I honestly believe is at times we've taken 4,000 bucks, and I don't know what the does rate was for those times, but 100 has been the average for a lot of years. Harvesting a disproportionate number of bucks also reduces the ability for the does to get bred. And we see those that don't have fawns for no good reason. And to me, that is a reason you have -- already have an imbalance. So, I think there's an excessive amount of does to compare it to the number of bucks, is what it amounts to. So, to address rebuilding of the population is not going to be addressed through eliminating 32 deer or 32 does in a season. It's going to be through addressing the predation issue that is the main culprit for bringing the population down.

Council Chair Don Hernandez, also a longtime resident of Unit 2, provided his local knowledge of the Unit 2 deer populations (SERAC 2025: 28):

> I think the deer population on Prince of Wales Island is kind of in a precarious state right now. For, you know, a lot of different factors always weigh into this. Predation is primary. We do

have a lot of predation of deer on Prince of Wales, and wolves and bears, people. We got some serious habitat considerations that have just been building as more and more acres, you know, coming to that stem exclusion, and are no longer good habitat. You know, we've been watching the way the -- just the way the predation patterns are changing on the island. The wolves, they travel these roads, they -- extensively makes them very effective predators. The fact that deer are more congregated in areas in the winter because of all the habitat degradation, the deer are forced to, essentially, kind of pack up more. And what's left of the good habitat, the wolves are clued into that – they, I mean, it's pretty obvious when you're out there, you know, observing what's happening that the deer are concentrated in these good habitat areas in the winter, and the wolves know that; they concentrate their efforts. They're pretty effective predators.

You know, all these factors, you know, it's the fact that all of the hunting pressure put on those -- the deer on Prince of Wales has really affected the whole age structure of the herd. You just don't see a whole lot of big, mature bucks. They don't survive long enough to get there. That's your, you know, most important breeding component. You know, what's that doing to the viability of the reproductive rates, you know, for the deer under the Prince of Wales? Just all of these factors, all coming together. You know, I think it just -- it puts that population in a precarious position and, you know, we -- and now, you know, we're talking about allowing more hunter -- hunting pressure to be added on to that. And you know, we -- there's a lot, of a lot of factors that I mentioned that we don't see, we don't have control over. The predation we can try and do something about, but that's always a challenge. But we can look at the hunting component, and that's what we need to do at this meeting. So, I think there is ample evidence that there is a conservation concern for deer on Prince of Wales, and we need to act accordingly.

The Council also pointed to the Unit 2 deer population's lack of response to mild winters as evidence of a developing conservation concern. Council member Cal Casipit noted (SERAC 2025):

I think there's an issue there on Prince of Wales, there the deer -- it's obvious the deer population is not responding to -- looking at this, there should have been a response in the deer population with these two last mild -- the two last mild winters. There should have been response in the population to that. There wasn't. I think there's something major going on there…

…Unit 2 is the only Unit that doesn't seem to be benefiting from milder winters. Unit 1, Unit 3, Unit 4, there are increases in harvest, and I think it's due to milder winters, bigger population, easier to find the deer. Your harvest goes up. It's -- it seems natural to me. Unit 2 is opposite. Even though they had the mild winters, they're still getting the decline in harvest, which to me indicates the population is still declining even though they've got the two mild winters that the other Units had. Could be wolves, could be something else, could be habitat -- I don't know. Who knows? Whatever it is. The issue is, they're declining. There is a conservation concern.

Throughout their discussion, the Council made it clear that the motivating factor in requesting the special action was the anticipated increase in hunting pressure once Ketchikan residents were able to hunt in Unit 2 under Federal regulations. Council member Cal Casipit, who proposed the request to the Council, discussed the rationale:

> I didn't propose this lightly and it conflicts me. I'm not concerned about people on -- people that live on Unit 2 harvesting does. I think that's completely logical and makes complete sense. Customary traditional use that -- I don't argue that. I think that's valid. And I think all things being equal, if we weren't dealing with this huge potential new number of subsistence users showing up on the island, and if that wasn't happening, I wouldn't be proposing this. I'm concerned about a couple thousand people from Ketchikan who don't necessarily have that customary and traditional way of doing things. Showing up on the island and harvesting thousands, you know, a thousand does. I just -- that worries me because I know. The KIC portion of Ketchikan is so much smaller than the rest of Ketchikan. And it isn't just – yeah. There's just going to be a whole bunch of users show up that don't have that traditional customary way of doing things, and that worries me. And I'm worried for the population of deer because of it.

Harvest History

See staff analysis for WP26-03/-04/-05 for more general harvest history information.

The harvest of five deer, only one of which may be a female, has been allowed under Federal regulations in Unit 2 since 2006. Non-federally qualified users (NFQUs) have generally been able to harvest up to four bucks in Unit 2. However, since 2018, NFQUs have been restricted to a harvest of two bucks on Federal public lands in Unit 2, following the August closure in the northwestern portion of POWI. Ketchikan residents were subject to these harvest limit restrictions for NFQUs until their recent rural status change in 2025. **Table 1** below shows hunter and doe harvest information for FQSUs, NFQUs, and Ketchikan residents with averages calculated the period before and after the 2 buck harvest limit restriction was implemented for NFQUs.

Based on data from harvest reports, relatively few does are harvested each year in Unit 2 (**Table 1)**. From 1997 to 2017, an estimated average of 77 does were harvested each year by FQSUs. This represents just 3% of the total estimated deer harvest during this period. However, the estimated number of does harvested has declined over time. From 2018 to 2024, FQSUs harvested an estimated average of 39 does each year, or about 2% of the average total FQSU harvest per year during this period (~1,229 deer per year) **(Table 1)**. The reason for this decline is unknown, but it is partially explained by a corresponding (but lesser) decline in the number of FQSU hunters.

However, Unit 2 is believed to have one of the highest rates of unreported and illegal harvests in the region (Hasbrouck 2023). The amount of unreported and illegal harvest has been estimated to be approximately equal to the reported harvest (~2,621 deer per year on average from 1997-2024) (Churchwell 2024, 2025). This means that the actual average deer harvest in Unit 2 may have been

closer to 5,242 deer per year from 1997-2024, and that the amount of does harvested each year is also likely higher than what can be estimated from reported harvest data (see Person 2010).

While no firm data on the extent and composition of illegal harvest is available, does are likely a substantial portion of the deer taken illegally. Bucks are legal to take by all users throughout the entire season, and so they are generally legal to harvest under most circumstances. Legal harvest of bucks is also more likely to be reported and accounted for in harvest statistics, as there is no risk in reporting them. However, does are only legal to harvest for a portion of the season and only by FQSUs, so they are more susceptible to illegal harvest. Correspondingly, hunters are unlikely to voluntarily report an illegal doe harvest, and any such harvest will not be reflected in harvest statistics. However, non-federally qualified users (NFQUs) appear to report some illegal doe harvest as reflected in the harvest data in **Table 1**. As doe hunts have been closed under State regulations since 1987, any doe harvest by NFQUs is illegal.

Under the current regulation, harvest ticket number five must be used when harvesting a doe. This provision is intended to provide a mechanism to limit each hunter to a single doe. However, under the Alaska Department of Fish and Game (ADF&G) online permit system, hunters are provided with an electronic copy of their harvest tickets, which can be printed multiple times. This may reduce the enforceability of the use of the harvest ticket system to be used for harvest of a single doe, as users can easily print multiple copies of harvest ticket number five.

From 1997-2017, Ketchikan residents harvested an average of 783 deer per year from Unit 2. Assuming Ketchikan residents harvest does at similar rates as other FQSUs, an additional 20 does may be harvested each year from Unit 2 by Ketchikan residents (2.5% of 783 deer) now that they will no longer be subject to the harvest limit restrictions for NFQUs.

Table 1. Estimated number of hunters and harvest of does in Unit 2 by user type, 1997-2017 (McCoy 2019) and 2018-2023 (Churchwell 2024, 2025).

Year	**FQSUs**		**Ketchikan NFQUs**		**Other NFQUs**	
	Hunters	Does	Hunters	Does	Hunters	Does
1997	958	71	632	0	185	0
1998	1099	62	686	0	154	5
1999	1176	71	502	5	221	7
2000	850	36	577	6	157	5
2001	1105	92	691	16	230	0
2002	1031	45	692	7	234	5
2003	734	47	525	0	292	8
2004	700	58	585	6	209	0
2005	994	97	491	2	317	2
2006	1134	80	561	4	291	5
2007	1084	82	522	1	390	4
2008	1109	97	601	11	396	4
2009	1015	83	602	17	431	2
2010	1083	83	652	1	457	3
2011	1138	95	615	4	459	8
2012	1250	91	726	2	507	2
2013	1239	73	728	0	500	3
2014	1337	104	779	12	605	2
2015	1352	89	777	2	679	6
2016	1307	77	673	4	687	1
2017	1127	76	635	0	495	3
2018	1024	60	417	0	439	0
2019	964	46	406	0	372	0
2020	960	42	316	0	400	1.2
2021	937	34	315	0	462	0
2022	897	38	289	0	446	0
2023	847	32	292	0	460	0
2024	819	20	233	0	587	0
1997-2017 Average	**1087**	**77**	**631**	**5**	**376**	**4**
2018-2024 Average	**921**	**39**	**324**	**0**	**452**	**0.2**

Discussion and Effects

If approved, these proposals would eliminate the Federal doe hunt in Unit 2. This could result in some subsistence users not being able to legally harvest a deer, especially those without the time, resources, or skill needed to harvest a buck instead of a doe. As the estimated number of does currently harvested in Unit 2 is relatively small, the overall harvest of deer in Unit 2 would not change significantly. Similarly, there would be relatively little change in the overall population and productivity of deer in Unit 2, which may be limited more by habitat-related density dependence than doe fecundity.

However, the Unit 2 harvest data are generally considered to underestimate the actual amount of harvest taking place, which is likely much higher due to the estimated amount of unreported and illegal harvest taking place. Radio collar studies (Gilbert 2015, Farmer 2006) recorded multiple incidences of legal and illegal harvest of does, suggesting that hunting mortality is higher than indicated by harvest reporting data. Closing the doe season may reduce illegal harvest somewhat, but this regulation change may not substantially affect Unit 2 deer populations, as illegal harvest of does would likely continue to some degree without enhanced enforcement.

The impact of adopting this proposal is also contingent on other Board actions, which will determine the user group or groups potentially affected by the closure of the doe season. The Southeast Council has also requested that deer harvest in Unit 2 be closed to NFQUs (WP26-03), and that an §804 prioritization be conducted among FQSUs (WP26-04). If those proposals are approved, and harvest of deer is limited to residents of Unit 2, then the doe harvest restriction would only affect Unit 2 residents. In that case, this proposal would remove the opportunity for Unit 2 residents to harvest does, likely providing only minor conservation benefits.

The proposal will have a greater effect if Ketchikan residents are included as eligible to hunt deer in Unit 2. In that case, the restriction on doe harvest may reduce the impacts of the addition of a large number of FQSUs on the Unit 2 deer population. From 2018 to 2024, an average of 324 Ketchikan residents hunted in Unit 2 each year, harvesting an average of 289 deer per year. However, the number of Ketchikan hunters and harvests is likely to increase if they are eligible to hunt under less restrictive Federal regulations. Before the harvest limit restrictions for NFQUs were implemented in 2018, an average of 631 Ketchikan hunters harvested about 783 deer per year from Unit 2.

If the number of Ketchikan residents hunting in Unit 2 remains unchanged from 2018-2024 levels, and they harvest does at a rate similar to that reported by Unit 2 residents (about 2-3% of the total harvest), an additional harvest of about 6-9 does per year can be expected (2-3% of 289 deer). If the number of Ketchikan hunters increases to pre-2018 levels, an additional harvest of about 16-24 does per year can be expected (2-3% of 783 deer). However, these are minimum assumptions. Incorporating other factors such as increased hunting effort from Ketchikan residents, additional illegal and unreported harvest, and the possibility that Ketchikan residents might harvest does at a higher rate, the expected number of does actually harvested may be substantially higher than recently reported rates. However, even when accounting for these factors, the additional doe harvest is unlikely to exceed 100 does per year. While

this level of doe harvest may not necessarily create a conservation concern on its own, it would reduce the population and productivity of deer in Unit 2, which already appear to be in decline.

In summary, the benefits that predator control efforts and doe harvest restrictions might provide to Unit 2 deer populations are not straightforward, and depend on the complex interplay of habitat quality, predation, weather, and harvest. In stem-exclusion staged forest with reduced carrying capacity, such efforts may largely result in compensatory mortality due to malnutrition.

OSM PRELIMINARY CONCLUSION

Oppose Proposal WP26-06/-07

Justification

The intent of the proposal is to prevent or mitigate a conservation concern based on an expected increase in doe harvest now that Ketchikan residents are able to hunt deer in Unit 2 under Federal regulations. However, the number of does that Ketchikan residents are expected to harvest is relatively low, and the Unit 2 deer population is likely limited more by habitat loss, harvest, and predation than by doe survival and productivity. The proposed regulation would also prevent Unit 2 residents from harvesting does, which would eliminate an important, customary and traditional opportunity for Prince of Wales Island residents and potentially decrease food security for some residents.

Further, if WP26-03/-04/-05 is adopted as modified by OSM, a regulatory mechanism will be in place to limit doe harvest to Unit 2 residents only. If WP26-03/-04/-05 is not adopted as modified by OSM, then the Board or Federal in-season manager could address the impacts of potential increases in doe harvest through an emergency special action.

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WRITTEN PUBLIC COMMENTS

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Please see the Written Public Comments on Wildlife Proposals and Closure Reviews section of the meeting book or www.doi.gov/subsistence/wildlife/public_comments for full comments.