



***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 907-209-7817 or deanna.perry@usda.gov.

Sincerely,



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