

**Kodiak/Aleutians Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199  
Phone: (907) 786-3888, Fax: (907) 786-3898  
Toll-Free: 1-800-478-1456

In Reply Refer To:  
OSM.R26026

MARCH 05 2026

Jake Fletcher, Chair  
Alaska Board of Game  
Alaska Department of Fish and Game  
Po Box 115526  
Juneau, Alaska 99811-5526

Dear Chair Fletcher:

I am submitting comments on behalf of the Kodiak/Aleutians Subsistence Regional Advisory Council (Council) on proposals 199, 200, 201, 203, 204 (deer), 220, 221, 230 (goats), 240, 245-248 (infrared), and 241 (mink), that will be considered during the March 20-25, 2026, Southcentral Region Board of Game (BOG) Meeting.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Kodiak Aleutians 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 forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on March 4-5, 2026, in Kodiak, and took up 14 BOG Proposals to provide comments. Please see the Council comments below.

**Proposals 199, 200, 201, 203 and 204** seek to increase the nonresident bag limit for deer in Unit 8 Remainder and were considered as a group. **The Council opposes these proposals**, but would support changing the nonresident bag limit from one buck to one deer, allowing buck-only until September 30, and any deer October 1-December 31. In 2023, the BOG reduced the nonresident bag limit for Unit 8 Remainder from three deer to one buck, and data shows this reduction has not negatively impacted nonresident participation, and clients are still booking charter and transporter services for Kodiak. In fact, even with the bag limit reduction in 2023, the nonresident participation has continued to increase, and if the nonresident bag limit is increased

to 2 or 3 deer, there is concern that nonresident hunter numbers will also increase, displacing resident hunters. The reduced bag limit of one animal seems to be working. However, the Council does support allowing harvest of any deer starting on October 1st to provide more flexibility for nonresident hunters but still stay within a one animal limit. Additionally, allowing the harvest of any deer after October 1st will improve meat quality.

**Proposals 220, 221, and 230** seek to extend seasons for goats and were considered as a group. **The Council supports these proposals.** Proposal 220 would change the season end date from January 31 to March 31 in areas RG471, RG472, RG473, RG474, and RG476. This would provide more hunting opportunity for Kodiak residents who are hunting goats for food. Specifically, it would provide more opportunity outside of November and December when the meat quality is the worst. Proposals 221 and 230 would lengthen the goat season in RG480 by changing the start date from August 20th to August 1st. This would provide more hunting opportunity and allow more families to hunt together while kids are out of school. This provides valuable learning opportunities for young hunters and could encourage more youth to get involved in hunting.

**Proposals 240, 245, 246, 247 and 248** all deal with using infrared or artificial devices to take furbearing animals with a trapping license and were considered as a group. **The Council supports Proposal 248**, and opposes any use of any electronically enhanced night vision devices, forward looking infrared devices, and artificial light while trapping (**we oppose Proposal 247**). Proposals 240, 245, and 246 all seek to accomplish the same thing as Proposal 248, but reference using these devices while hunting, which is already prohibited. The Council previously submitted comments in opposition to similar proposals allowing these types of devices at the Statewide BOG meeting in 2025. We do not believe using these types of devices while trapping is in the spirit of fair chase; this is not how we do things in our community, and their use is not appropriate for Kodiak. As the Council noted in our previous comments, night vision and forward-looking infrared devices are extremely effective for spotting game and furbearers and will confer a significant advantage to trappers, particularly when long-range trapping with a gun. There is also concern about overlapping trapping seasons and big game seasons where these devices could be legally used in trapping while at the same time conferring an advantage to hunters where infrared is not allowed (for example these devices could be used to spot bears emerging from dens in the spring). The Council is also concerned that using these devices along the shoreline could decimate the local population of foxes.

**Proposal 241** would open a year-round season for trapping mink in Unit 8. **The Council supports Proposal 241.** Mink are not native to Kodiak Island. In recent years, Kodiak residents have reported seeing more and more mink, and the population appears to be expanding into new areas. Mink have been observed in downtown Kodiak, around the processing plants, in residential areas, and out the road away from town. Mink are voracious predators, and we are concerned that mink will predate on seabird nests and negatively impact seabird populations that are an important subsistence resource.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Leigh Honig at (907) 310-4097 or [leigh\\_honig@ios.doi.gov](mailto:leigh_honig@ios.doi.gov).

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Skinner".

Rebecca Skinner,  
Chair

cc: Federal Subsistence Board  
Interagency Staff Committee  
Kodiak/Aleutians Subsistence Regional Advisory Council  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Aaron Poetter, Division of Wildlife Conservation, Alaska Department of Fish and Game  
Office of Subsistence Management  
Administrative Record