



***Southeast Alaska
Subsistence Regional
Advisory Council***

**Don Hernandez, Chairman
1011 E. Tudor Road, MS121
Anchorage, Alaska 99503**

In Reply Refer To:
OSM.R26038

MAY 12 2026

Anthony Christianson, Chair
Federal Subsistence Board
c/o Office of Subsistence Management
1011 E. Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chairman Christianson:

The Southeast Alaska Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY2025 annual report to the Federal Subsistence Board (Board) under the provisions of Section 805(a)(3)(D) of the Alaska National Interest Lands Conservation Act (ANILCA). At its public meeting held on December 17–18, 2025, the Council identified concerns and recommendations for this report. The Council approved this annual report at its winter 2026 meeting. The Council wishes to share information and raise a number of concerns dealing with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Southeast Region.

1. Youth engagement and student participation

The Council requests continued funding to support student attendance and participation at Regional Advisory Council meetings and emphasizes the importance of youth involvement in subsistence governance. The Council supports the creation and continuation of a youth or young leader non-voting Council seat and notes progress toward final appointment. Continued investment in youth education related to subsistence harvesting, preparation, and use of resources is strongly encouraged.

2. Non-resident unguided hunting and fishing impacts on subsistence resources

The Council expresses ongoing concern about the increasing presence of non-resident unguided hunters and anglers in Southeast Alaska. These activities, often supported by lodges or commercial entities that provide transportation, vessels, vehicles, or equipment without accompanying guide services, function similarly to commercial operations and may fall under special use permits issued by the U.S. Forest Service, particularly on lands within the Tongass National Forest.

The Council is concerned that these unguided and outfitted activities are placing growing pressure on subsistence resources, especially in areas with limited monitoring and biological data. Increased non-resident participation may lead to localized overharvest, reduce availability and access to resources by subsistence users, and create conflicts among user groups. The Council notes that similar concerns have been raised in previous years with limited improvement and emphasizes the potential for long-term conservation impacts if these trends continue unaddressed.

The Council requests that the Board review how U.S. Forest Service special use permits are issued, including the number of permits authorized, cumulative impacts, and monitoring of compliance, and then advise the Council what options exist where it might advocate for measures to protect an adequate, if not abundant, amount of subsistence resources. The Council also encourages state and federal partners to evaluate and address these pressures to ensure that subsistence users retain priority access and sustainable harvest opportunities.

3. Need for increased wildlife monitoring and biological capacity

The Council identifies an ongoing and critical need for expanded wildlife and fisheries monitoring projects throughout Southeast Alaska. The Council is concerned that many management decisions affecting subsistence are being made with limited, outdated, or incomplete survey data, which limits the ability to assess population status, trends, and cumulative impacts. Without adequate biological information, it is difficult to evaluate conservation concerns, respond to emerging issues, or ensure effective management.

The Council requests increased funding to support additional area biologists in Southeast Alaska, including both fish and wildlife positions, and notes longstanding staffing shortages in several locations, including Prince of Wales Island. Greater biological capacity is necessary to conduct regular surveys, address local concerns, and improve data available for decision-making.

The Council also requests a clear mechanism to address community-identified areas of concern through targeted monitoring or research. Council members frequently raise site-specific issues related to resource abundance, predator-prey interactions, and user pressure that cannot be investigated due to limited staffing capacity. Improved coordination and dedicated resources would allow these concerns to be evaluated in a timely and meaningful way.

4. Habitat impacts from past logging practices

The Council continues to be concerned about the long-term impacts of past logging practices, particularly extensive second-growth forests on Prince of Wales Island. Residents have reported declines in deer populations and other subsistence resources, raising concerns about habitat quality in previously clearcut areas.

The Council requests that the U.S. Forest Service resume or strengthen adaptive management and habitat restoration efforts to improve wildlife habitat and ensure local communities maintain access to important subsistence resources.

5. Tribal co-management and collaborative research

The Council strongly supports expanded co-management and collaborative research with Tribes. Tribal governments are embedded within rural communities and bring local knowledge, year-round presence, and cultural understanding that can enhance monitoring, data collection, and stewardship of fish and wildlife resources. The Council notes that reductions in funding have limited the opportunities to sustain these partnerships and apply this local expertise. Renewed investment in Tribal capacity building and cooperative programs would improve information available for management decisions, strengthen communication between agencies and communities, and support shared responsibility for conserving subsistence resources.

The Council requests that the Board explore options for formal agreements to effectuate tribal co-management and collaborative research to help ensure that Council members and Federal Subsistence Management Program staff have the most current information and observations necessary to deliberate and make sound resource management decisions.

6. Education, curriculum development, and outreach

The Council requests Board support for subsistence education efforts, including the development of curriculum focused on youth engagement and the transmission of traditional knowledge and practices. These materials are intended to educate younger generations about subsistence uses, resource stewardship, and cultural connections to the land and waters.

The Council encourages finalizing, publishing, and distributing them broadly for use by schools, Tribes, and local organizations and the Council requests that the Board assist with this effort so that this key resource can be used by other interested groups.

7. Subsistence halibut coordination

The Council requests continued coordination with the U.S. Fish and Wildlife Service representative to the North Pacific Fishery Management Council (NPFMC) regarding subsistence halibut issues. The Council is concerned about how halibut management decisions made through the NPFMC may affect subsistence users in rural Southeast Alaska, particularly as conservation measures, harvest limits, and management actions continue to change, and as subsistence users face increasing uncertainty regarding access and opportunity. The Council seeks improved communication and coordination to ensure that subsistence needs and regional impacts are considered during NPFMC deliberations.

The Council requests support, including but not limited to, funding for Council member(s) to engage with NPFMC at meetings in the future to convey Southeast Alaska specific information to aid NPFMC in making sound management practice decisions, specifically regarding halibut.

The remainder of this report is for informational purposes only and the Council does not require a response; however, the issues are significant and the Board may benefit from this knowledge.

- **King Salmon subsistence allocation concerns**

The Council raises concerns regarding the lack of subsistence allocation for King (Chinook) Salmon in Angoon, noting that local Tribes, including Angoon created from the Indian Reorganization Act (IRA), have not been provided with data demonstrating that subsistence harvest by residents contributes to conservation concerns or overharvest. The Council is concerned that subsistence users may be restricted without clear, area-specific information supporting those decisions.

The Council would like to see future allocation decisions be transparent, data-driven, and based on area-specific monitoring and assessment. The Council encourages collaboration with Tribes to ensure that the information used in allocation decisions accurately reflects subsistence needs and community harvest patterns. It is vital to provide clear data and rationale to help maintain subsistence access, to support conservation objectives, and to strengthen trust between communities, the Council, and resource managers.

- **Importance of surveys and predator–prey information**

The Council emphasizes that increasing pressure on subsistence and other hunting requires reliable information on wildlife populations. In many areas, surveys are limited, making it difficult to assess population status or predator-prey dynamics. The Council supports expanded surveys to assess potential impacts from predators, such as wolves, and other factors affecting subsistence hunting opportunities.

- **Secretarial Review of Federal Subsistence Management Program and protection of subsistence access**

The Council states that any changes resulting from the Secretarial Review of the Federal Subsistence Program should not restrict or diminish the ability of subsistence users to continue their customary and traditional hunting, fishing, and gathering activities.

- **Subsistence data and flexibility in allocations**

The Council acknowledges the work of the State of Alaska Division of Subsistence in conducting community harvest surveys and developing Analytical Needs Statements. However, the Council clarifies that the Federal Subsistence Management Program is not bound to fixed subsistence harvest numbers and that subsistence users take what they need based on circumstances. Continued collaboration with the State, particularly with surveys that capture the harvests of the community on natural resources close to their villages, is encouraged while recognizing that flexibility (not locking into that survey baseline number) must be considered for rural residents to meet subsistence needs.

The Southeast Alaska Subsistence Regional Advisory Council appreciates the Board's attention to these matters and the opportunity to assist the Federal Subsistence Management Program in meeting its charge of protecting subsistence resources and uses of these resources on Federal public lands and waters. The Council looks forward to continuing discussions about the issues and concerns of subsistence users in the Southeast Alaska Region. If you have any questions regarding this report, please contact DeAnna Perry, Subsistence Council Coordinator, USDA – Forest Service, at deanna.perry@usda.gov or 1-800-478-1456 or 907-209-7817.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald Hernandez", enclosed in a thin black rectangular border.

Don 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