



Federal Subsistence Board

Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503 – 6199



In Reply Refer To:
F26035

AUG 13 2026

Donald Hernandez, Chair
Southeast Alaska Subsistence
Regional Advisory Council
c/o Office of Subsistence Management
1101 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Hernandez:

Thank you for your Council's letters dated May 8, 2025 (OSM.B25032) and May 21, 2026 (OSM.R26043). The Federal Subsistence Board (Board) apologizes for our tardy response and appreciates the Council's continued engagement on Unit 2 wolf management and the concerns shared on behalf of subsistence users.

Council's Requests (2025 and 2026 Letters)

In the May 8, 2025, the Council requested that the Board:

- Support a minimum 45-day wolf trapping season in Unit 2 whenever the four-month codified season is reduced through special action.
- Direct the in-season manager to incorporate Traditional Ecological Knowledge (TEK) and local subsistence knowledge when setting seasons, and to provide an explanation whenever such information is not used.

In the follow-up letter dated May 21, 2026, the Council recommended that:

- The Unit 2 wolf hunting season remains open independent of the trapping season to increase harvest opportunity.
- The Unit 2 wolf trapping season closes no earlier than December 24 and be no shorter than 40 days.

Board Review and Action on Proposal WP26-10

During the April 21–24, 2026, regulatory meeting in Anchorage, the Board considered WP26-10, which proposed establishing a guaranteed 47-day wolf trapping season in Unit 2 by moving the codified end date from March 31 to December 31. The Board heard extensive public and Tribal testimony expressing that current subsistence needs for wolf pelts are not being met.

Ultimately, the Board rejected WP26-10 because:

- Under ANILCA Title VIII, subsistence management must follow sound wildlife management principles and ensure conservation of healthy populations.
- Adopting a guaranteed season length would restrict the in-season manager's ability to respond to population or conservation concerns.
- Establishing conflicting Federal and State season dates would reduce management effectiveness, particularly since most wolf harvest occurs on State-managed lands.

ANILCA Requirements and In-season Management

ANILCA Section 802 requires that subsistence management must be consistent with sound wildlife management principles and the conservation of healthy populations, while Section 815 makes clear that subsistence uses may not be authorized at levels inconsistent with maintaining healthy wildlife populations. Guaranteeing a season length without a harvest limit would remove the in-season manager's ability to respond to emergencies and would violate these requirements. These same ANILCA requirements apply to the authority, delegated by the Board, to the in-season manager, the Prince of Wales Island District Ranger.

The Board emphasizes that proper sustainable management relies on biological data, harvest information and genetic research, as well as TEK and local knowledge. The Board strongly encourages in-season managers to incorporate TEK into all decisions.

Ongoing State Research and Monitoring Efforts

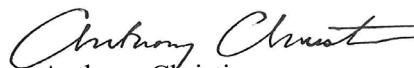
At the April 2026 Board meeting, the Alaska Department of Fish and Game (ADF&G) provided an update on extensive research efforts informed in part by local and traditional knowledge from the annual Unit 2 wolf public hearings. Current research aims to assess hair board use rates by demographic groups, sustainable wolf population thresholds, gene flow between wolves in Southeast Alaska and coastal British Columbia, and population density throughout GMU 2. Research is also testing the use of cameras to better estimate population levels. The Board encourages the in-season manager to stay informed on the most recent results of ongoing research and incorporate evolving research with TEK when making management decisions.

Path Forward

The Board encourages the U.S. Forest Service in-season manager and ADF&G biologists to use the best available scientific, traditional, and local knowledge to ensure continued subsistence opportunity and healthy wolf populations. The Board also recognizes the importance of regulatory alignment in trapping season length for effective management of this wolf population. The Board also encourages managers to consider the Council's recommendation to keep the Unit 2 wolf hunting season open independently from the trapping season, recognizing that hunting harvest is limited but may offer additional opportunities during the Unit 2 deer season.

Thank you again for your ongoing engagement and for bringing forward the concerns of subsistence users in Southeast Alaska.

Sincerely,


Anthony Christianson,
Chair

cc: Federal Subsistence Board
Office of Subsistence Management
Interagency Staff Committee
Southeast Alaska Subsistence Regional Advisory Council members
Deputy Commissioner, Alaska Department of Fish and Game
Federal Subsistence Liaison, Alaska Department of Fish and Game
Administrative Record