



**Office of the President**

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April 3, 2025

Regulations Attention DOI-2024-0011  
Office of Subsistence Management  
1011E. Tudor Road. M/S 121  
Anchorage Alaska 99503

Dear Members of the Federal Subsistence Board,

In solidarity with Craig Tribal Association (CTA) and other the other sovereign tribes on Prince of Wales Island (POW). Ketchikan Indian Community (KIC) recommends a proactive approach to protecting the deer population on POW / Unit 2.

Proposed KIC Amendments to 36 CFR 242.26, and 50 CFR 100.26:

1. Restrict Non-POW Federally Qualified Subsistence Users harvesting deer on POW / Unit 2 to currently applicable Personal-Use Harvest Regulations for deer.
2. Restrict Non-POW Federally Qualified Subsistence Users harvesting deer on POW / Unit 2 to no doe harvest, if allowed in currently applicable Personal-Use Harvest Regulations for deer.
3. Non-Alaskan Residents hunting in Unit 2 would be limited to 1 buck only with a season starting on August 15<sup>th</sup>.

These should apply until such time that the POW deer population has recovered sufficiently as determined by consensus of POW tribal and agency wildlife managers.

Rationale:

1. The recommended changes would assure both minimal negative impacts on Unit 2 Deer populations, and the hunting opportunities of the new federally qualified subsistence users in Ketchikan.
2. Ketchikan residents would be able to harvest deer under the federal subsistence regulations on Revilla Island / Unit 1A, once the new Rural Status Designation takes effect. Currently up to 5 deer (4 bucks and 1 doe from Oct 15<sup>th</sup> – Jan 31<sup>st</sup>)

3. Other federal lands in the State of Alaska approved for deer harvesting would be available for both POW, Ketchikan and other federally qualified subsistence users.

Final Thoughts:

These changes will help to mitigate outside hunting pressure on POW Island deer populations. POW residents and tribes will have a local priority to the deer resources in their communities, which is consistent with ANILCA. These recommended regulatory changes are common-sense measures that provide assurances that the local population of POW Island will be more likely to meet their subsistence needs in the near and long term. We fear keeping the status quo and waiting until the deer population collapses before Section 804 provisions can be implemented would harm the deer population and subsistence harvesters on POW Island / Unit 2.

Gunalchéesh,



Gloria Burns, President  
Ketchikan Indian Community

See Attached Maps of Unit 2 and 1A for geographical reference