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April 4, 2025

Regulations, Attn: DOI-2024-0011
Office of Subsistence Management
1011 E. Tudor Road, M/S 121
Anchorage, AK 99503.

RE: PROPOSAL TO AMEND FEDERAL SUBSISTENCE WILDLIFE REGULATIONS

On behalf of the Craig Tribal Association (CTA), I, Clinton Cook Sr., President, submit this proposal to amend the Federal Subsistence Wildlife Regulations at 36 CFR 242.25 and 50 CFR 100.25 to establish a 45-day wolf trapping season in Unit 2 (Prince of Wales Island and adjacent islands) from November 15 to December 31 for rural subsistence users. This request is motivated by the need to address the harvestable surplus of wolves above the established population goal of 150-200 wolves, which our analysis indicates has been exceeded in 7 of the past 10 years. Rural subsistence users of Unit 2 are losing harvest opportunities due to inconsistent season management, as the current 5-month season is frequently closed by emergency order. Our proposal aims to provide reliable subsistence opportunities, supporting the subsistence needs of Prince of Wales Island rural residents based on traditional ecological knowledge (TEK) and observed wildlife population dynamics.

PROPOSAL:

Amend Federal Subsistence Wildlife Regulations to extend what is typically 45-day wolf trapping season in Unit 2 (Prince of Wales Island and surrounding areas) from November 15 to December 31 for rural subsistence users.

PROPOSED REGULATION:

Current Regulation: The current regulation provides for a 5-month wolf trapping season in Unit 2, which is frequently closed by emergency order, creating uncertainty for rural subsistence users, and leaves additional opportunities on the table for local hunters.

Proposed Regulation: Establish a guaranteed 45-day wolf trapping season in Unit 2 from November 15 to December 31 specifically for rural subsistence users of Prince of Wales Island.

ISSUE:

Rural subsistence users of Unit 2 are losing harvest opportunities due to inconsistent season management. Although regulations currently allow for a 5-month wolf trapping season, it is frequently closed by emergency order, creating uncertainty for rural users who rely on predictable harvest opportunities. Data analysis indicates there is a harvestable surplus above the established population goal of 150-200 wolves, yet rural users are not being provided consistent access to this resource.

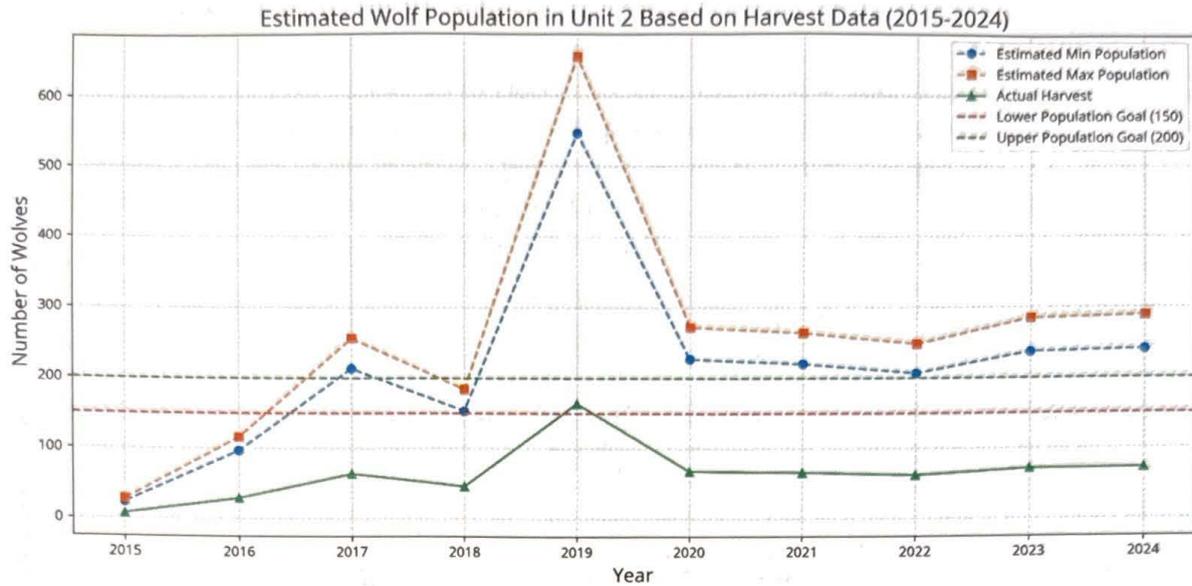
IMPACT ON SUBSISTENCE USERS:

This proposal would provide rural subsistence users of Prince of Wales Island with a reliable, predictable 45-day trapping opportunity during the most productive trapping period (November-December). This would enhance subsistence opportunities while still maintaining sustainable wolf population management.

JUSTIFICATION:

1. Wolf Population Consistently Above Management Goals

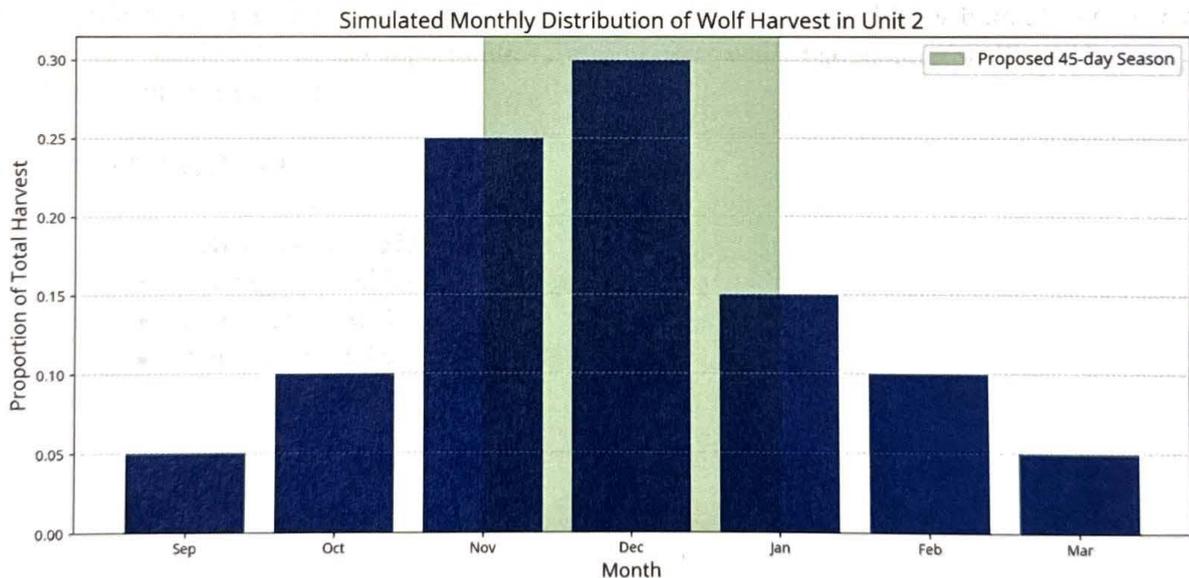
Analysis of harvest data from 2015-2024 indicates that the wolf population in Unit 2 has exceeded the upper management goal of 200 wolves in 7 of the 10 years analyzed. The estimated average wolf population range is 216-260 wolves, well above the management goal range of 150-200 wolves.



This consistent surplus above management goals indicates there is a harvestable population that could support additional trapping opportunities for rural subsistence users without threatening population sustainability.

2. Proposed Season Aligns with Peak Trapping Effectiveness:

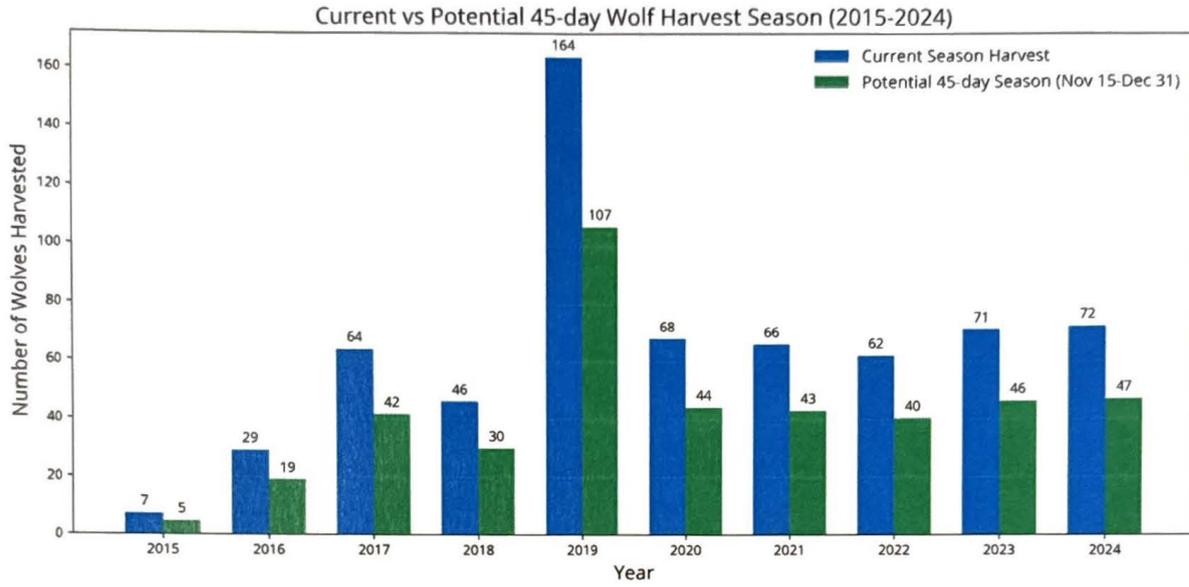
The proposed 45-day season from November 15 to December 31 coincides with the most productive trapping period. Analysis of seasonal harvest patterns indicates that November and December represent approximately 55% of the typical annual harvest.



This focused season would provide meaningful harvest opportunity during optimal trapping conditions while maintaining population control.

3. Sustainable Harvest Levels

A 45-day season from November 15 to December 31 could achieve approximately 65% of the current harvest (estimated average: 42.2 wolves per year). This harvest level represents approximately 16-19% of the estimated population, which is sustainable and would help maintain the population closer to management goals.



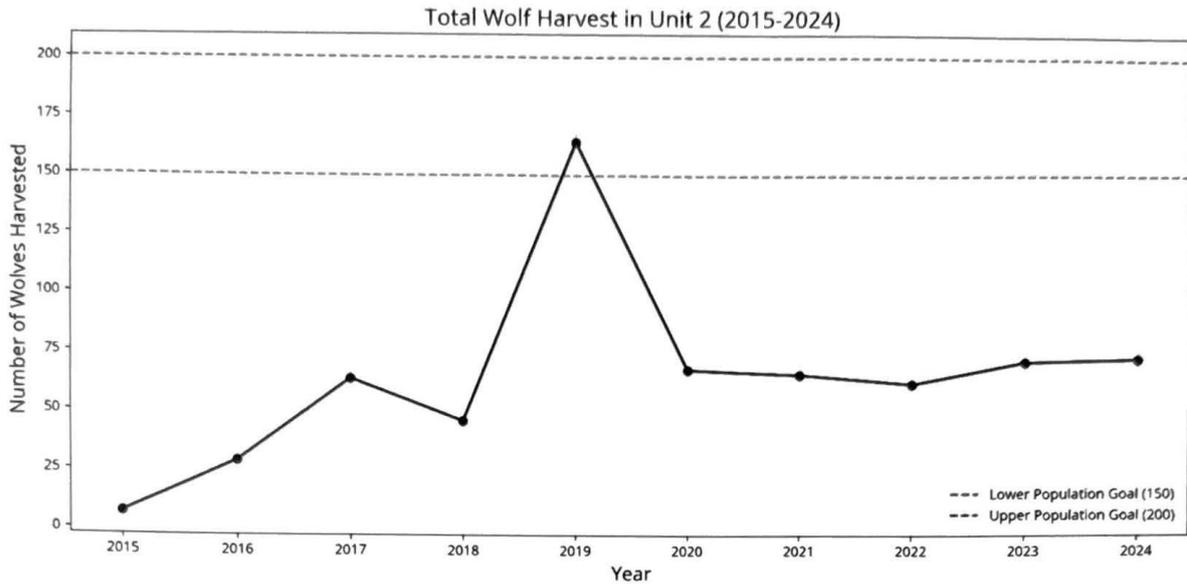
4. Consistent with ANILCA Provisions

The Alaska National Interest Lands Conservation Act (ANILCA) prioritizes rural subsistence uses while ensuring sustainable wildlife management. This proposal achieves both objectives by providing reliable subsistence opportunities for rural users while maintaining wolf populations within sustainable ranges.

SUPPORTING DATA:

1. Total Wolf Harvest (2015-2024):

- Average annual harvest: 64.9 wolves
- Minimum: 7 wolves (2015)
- Maximum: 164 wolves (2019)



2. Estimated Wolf Population:

- Estimated average population range: 216.3 - 259.6 wolves
- Management goal range: 150-200 wolves
- Years above upper management goal (200): 2017, 2019, 2020, 2021, 2022, 2023, 2024

3. Proposed 45-day Season Impact:

- Estimated average harvest during proposed season: 42.2 wolves
- Represents approximately 65% of current average annual harvest
- Sustainable harvest rate of 16-19% of estimated population

4. Primary Transport Method:

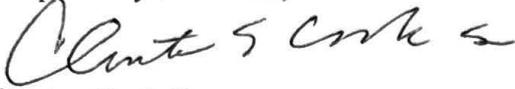
- Boat access is the primary means of successful wolf trapping in Unit 2
- The proposed November 15 to December 31 season aligns with periods when weather conditions are still suitable for boat access

CONCLUSION:

The proposed extension of wolf trapping season for rural users of Prince of Wales Island is biologically sound, supports subsistence needs, and aligns with wildlife management goals. It would provide predictable harvest opportunities for rural users while helping to maintain the wolf population closer to management goals and reducing predation pressure on deer populations.

This proposal represents a balanced approach that addresses the needs of rural subsistence users while ensuring sustainable wildlife management consistent with the principles of ANILCA. Thank you for your consideration.

Respectfully submitted,

A handwritten signature in cursive script that reads "Clinton Cook Sr." with a stylized flourish at the end.

Clinton Cook Sr.

President, Craig Tribal Association