



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

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

**In Reply Refer To:
OSM.B25032**

MAY 08 2025

Anthony Christianson, Chair
Federal Subsistence Board
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Christianson:

The Southeast Alaska Subsistence Regional Advisory Council (Council) met March 18–20, 2025 and discussed concerns about wildlife management for subsistence resources in the region. During its meeting, the Council voted to send this letter to the Federal Subsistence Board (Board) to request changes to wolf management in Unit 2 - Prince of Wales Island (POW) that will provide for the continuation of subsistence uses of wolf pelts.

As you are aware, some of the Council's duties include reviewing and evaluating regulations, policies, management plans, and other matters that may impact subsistence resources critical to the southeast Alaska communities it serves. The Council has been aware of the challenges in wolf management on POW for many years and has tried to advocate for modifications in Federal and State regulations to address concerns based on the information and testimony received. Trappers on POW have expressed that more opportunities for the take of wolves should be provided to federally qualified subsistence users because their subsistence needs for wolves are not being met.

The Council, in its desire to seek a solution to the issue, has engaged with the Alaska Department of Fish and Game (ADF&G) on its wolf management plan for several years. The Council provided feedback on the challenges of managing wolves with a harvest guideline and endorsed ADF&G's management change from quotas to genetic-based population estimates in 2018. The Council's support of ADF&G's Alaska Board of Game Proposal #43 in early 2019 was largely based on the assurances from ADF&G that they would incorporate traditional ecological knowledge (TEK), hunter/trapper reports, tribal and community reports, den checks, and the examination of the age of harvested wolves in its management of Unit 2 wolves.

Management under the new population objective strategy has been occurring for approximately four seasons; however, concerns for wolf management on POW continue to come before the Council through public testimony and Council members sharing their personal experiences. A Council member who has 61 years of experience studying and trapping wolves on POW routinely relays his first-hand experience of harvesting wolves on the island. From observations and encounters by many over the last several years, local knowledge supports that there is a harvestable surplus of wolves, but it appears that the wolf population is being managed too conservatively. People have voiced their apprehension with managing to a population objective, noting that this level of conservative management is allowing the wolf population to increase to such a degree that the overall ecosystem on POW is unbalanced and even harmed. There is a wealth of knowledge from local rural residents regarding the health and sustainability of POW wolf populations; however, it does not seem that this information is being considered when setting the annual wolf season and as a result, wolves are not being managed consistent with the wolf management plan.

During the recent wolf discussion at their meeting, the Council reflected that there have been three petitions to list the POW wolves under the Endangered Species Act (ESA). Each petition process concluded with the finding that listing this species, either endangered or threatened, was not warranted. In the last Species Status Assessment, the best available science and Indigenous knowledge was considered. The Council feels the inclusion of TEK and local knowledge is important in all determinations regarding wolves, which would include those made about wolf harvest and not just for monumental ESA listing decisions. These comments should be given weight and not dismissed when those decisions are made. The taking of wolves should not be solely characterized as predator control, nor should the threat of another ESA listing petition be a reason to limit wolf harvest by subsistence users.

Based on the above information, the Council believes that the current wolf management policy is unnecessarily restricting subsistence uses of wolves in Unit 2 and that adjustments should be made to the way the wolf management plan is implemented. Specifically, based on public testimony received at the winter Council meeting, subsistence users are unable to sufficiently continue their subsistence uses of wolves for pelts and handicrafts. Wolf pelts are expensive, and more opportunities to harvest wolves for various uses should be given to continue the traditional use of wolf pelts for the making of cultural items and handicrafts. The Council would like to offer suggestions to improve the ability of subsistence users to harvest wolves and continue their subsistence uses of this species.

The Council formally requests that:

- The Board consider and support a 45-day minimum trapping opening for Unit 2 wolves when the four-month season is reduced through special action before the next harvest season. In the past, wolves were managed by special actions and the harvest period limited to 31 days. The Council would like to see this past habit of establishing a 31-day opening by special action extended to an opening for 45 days under special action. This increase in harvest opportunities is necessary to ensure the continuation of subsistence uses for wolves on POW for federally qualified subsistence users under the current wolf management strategy.

- The Board direct the in-season manager to strongly consider TEK and the knowledge of local subsistence users in setting seasons for wolf harvest. The knowledge and experiences shared through consultations and public meetings must be included in decisions made under delegation of authority letters. If TEK and local knowledge is not incorporated into the decision, the in-season manager should provide an explanation of why this information was not considered.

The Council appreciates the Board's support in directing federal managers to use their delegated authority to manage wolves in Unit 2 to meet rural residents' subsistence needs and allow for the continuation of subsistence uses of wolves. With the above suggested adjustments in process, the increased opportunities for subsistence users are achievable under the current wolf management plan.

If you have any questions regarding this letter, they can be addressed through our Council Coordinator DeAnna Perry at 907-209-7817 or deanna.perry@usda.gov.

Sincerely,



Donald Hernandez
Chair

cc: Federal Subsistence Board
Southeast Alaska Subsistence Regional Advisory Council Members
Office of Subsistence Management
William Braun, Acting Craig District Ranger, USDA Forest Service
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department of
Fish and Game
Interagency Staff Committee
Administrative Record