

Federal Subsistence Wildlife Special Action Request

Proponent: Southeast Alaska Subsistence Regional Advisory Council

Issue: Eliminate the doe hunt in Unit 2 for the 2025/26 regulatory year if the final rule establishing Ketchikan as a rural community publishes before the end of the Unit 2 deer season.

Current Federal Regulations:

Unit 2—Deer

5 deer; however, no more than one may be a female deer. Female deer may be taken only during the period Oct. 15-Jan. 31. Harvest ticket number five must be used when recording the harvest of a female deer but may be used for recording the harvest of a male deer. Harvest tickets must be used in order except when recording a female deer on tag number five. Jul. 24 – Jan. 31

Federal public lands on Prince of Wales Island, excluding the southeast portion (land south of the West Arm of Cholmondeley Sound draining into Cholmondeley Sound or draining eastward into Clarence Strait), are closed to hunting of deer from Aug. 1 - Aug. 15, except by Federally qualified subsistence users hunting under these regulations.

Non-federally qualified users may only harvest up to 2 male deer on Federal public lands in Unit 2.

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Justification

While there are already conservation concerns over the Unit 2 deer population, these concerns will increase exponentially once thousands of additional federally qualified subsistence users from Ketchikan harvest deer, particularly does, from Unit 2 under Federal regulations. Previously, Ketchikan residents were limited to two bucks on Federal public lands in Unit 2. Federal regulations allow for the harvest of five deer, one of which may be a doe.

While biological data are lacking with no actual population estimates, traditional ecological knowledge (TEK) from POW residents and public comments received during Council meetings strongly attest to the significant decline of the Unit 2 deer population. Using harvest as index for population size, this TEK is corroborated by substantially decreasing reported deer harvest since 2015.

Doe harvest is a customary and traditional practice for Prince of Wales (POW) residents, and current levels of doe harvest in Unit 2 are sustainable. From 2020-2023, an annual average of only 37 out of the 1,741 or 2% of deer harvested from Unit 2 were does.

However, the Council is extremely concerned about highly unsustainable doe harvest when thousands of Ketchikan residents may harvest deer from Unit 2 under Federal regulations, significantly increasing doe harvest. Because of this, for the 2025/26 regulatory year, the Council believes conservation concerns over the viability of the Unit 2 deer population necessitate eliminating doe harvest completely. A recognized principle of wildlife management is to mitigate female harvest when there is a conservation concern as they are the reproductive engines of the population.

The Council views this request as a proactive measure to conserve the Unit 2 deer population before the situation becomes even more dire as one bad winter and excessive doe harvest could devastate the population and greatly prolong recovery. While multiple, interactive factors such as predation, habitat loss, and weather have contributed to the decline of the Unit 2 deer population, hunting and harvest mortality, particularly of does, are the most controllable factors.

While the Council recognizes eliminating doe harvest may hurt POW subsistence users whose subsistence needs for deer are already not being met, regulatory mechanisms do not currently allow for doe harvest by only a subset of subsistence users; and conservation of does is paramount to protect subsistence opportunities into the future. The Council is aware that a proposal to eliminate the doe hunt has been submitted for the 2026-2028 regulatory cycle to address this issue in codified regulations. However, the Council considers this special action request necessary to get through the 2025/26 deer season without further exacerbating conservation concerns.

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