

Federal Subsistence Wildlife Special Action Request

Proponent: Southeast Alaska Subsistence Regional Advisory Council

Issue: Conduct a §804 user prioritization analysis for deer in Unit 2 for the 2025/26 regulatory year.

The Council also submitted a companion proposal for the 2026-2028 regulatory cycle.

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.

Proposed Federal Regulations:

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

Federal public lands are closed to deer hunting except by residents of (communities to be determined via a §804 analysis) hunting under these regulations for the 2025/26 regulatory year.

Justification

The Council believes a §804 analysis is required to prioritize the subsistence users most dependent upon the Unit 2 deer population. The Council is extremely concerned about the impacts to the deer population and subsistence users on Unit 2 now that Ketchikan is a rural, federally qualified community. Prince of Wales Island (POW) residents are not meeting their subsistence needs for deer, which is one of the most harvested and utilized subsistence resources by Unit 2 communities.

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 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.

The Council also notes that the need for §804 determinations if Ketchikan becomes rural was a central discussion point during deliberation on NDP25-01, and acknowledged by many Ketchikan residents. The Council understands that restricting non-federally qualified users is necessary before restrictions to subsistence users may occur and notes a request to close deer hunting to non-federally qualified users was also submitted.

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. Of particular alarm, the Unit 2 deer population has not positively responded to the mild winters over the past two years. Deer populations usually increase as a result of mild winters due to higher over winter survival rates because forage is more accessible. However, while Units 1, 3 and 4 saw an uptick in deer harvest in response to the mild winters, Unit 2 harvest slightly declined.

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 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 are the most controllable factors. The Council is also concerned about the age structure of the deer population as hunters often harvest large bucks, which negatively impacts reproduction as does are less likely to breed with younger bucks.

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