



Southeast Alaska Subsistence Regional Advisory Council

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

March 17, 2021

ADF&G Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

VIA EMAIL ONLY: dfg.bog.comments@alaska.gov

RE: PUBLIC COMMENT ON BOARD OF GAME PROPOSAL 194

To the Board of Game:

The Southeast Alaska Subsistence Regional Advisory Council (Council) is meeting for its winter meeting (March 16-18, 2021). At this meeting, the Council discussed the Board of Game Proposal 194. The Council represents the Federally qualified subsistence user and it reviews resource management actions that may impact subsistence resources critical to those users. The Council would like to provide the following comment on this proposal, to be considered by the Board during its deliberations on this proposal on March 18, 2021:

The Council OPPOSES Board of Game Proposal 194, especially if implemented in a shortened wolf season. The Council anticipates shorter seasons in the immediate future and feels that this proposal, designed to improve the population estimate for Unit 2 wolves, would provide limited value for the population model and that the benefit would not outweigh the burden placed on subsistence users. The Council would support a sealing requirement of seven days after the end of the season. Additionally, there are not enough sealers in Unit 2 and this would result in a hardship on trappers to find a sealer. For those trappers working out of a boat, access and safety may be an issue in bad weather. This could affect a trapper's ability to harvest while meeting a weekly sealing requirement. For this regulation to be effective, a companion federal proposal should be submitted to the Federal Subsistence Board and the Council would suggest that the

Alaska Department of Fish and Game consider an alternative that does not require a regulation change: encourage trappers to seal sooner on a voluntary basis.

The Council appreciates the opportunity to convey its concerns about the effect of BOG Proposal 194. If you have any questions regarding this letter, they can be addressed through our Council Coordinator, DeAnna Perry, at 907-209-7817, dlperry@usda.gov.

Sincerely,



Donald Hernandez
Chair

cc: Federal Subsistence Board
Southeast Alaska Subsistence Regional Advisory Council Members
Sue Detwiler, Acting Assistant Regional Director, Office of Subsistence Management
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Ken Lord, Assistant Regional Solicitor, DOI – Office of the Solicitor
Michael Routhier, Attorney Advisor, DOI – Office of the Solicitor
Interagency Staff Committee
Administrative Record