

## **Proposed Change to Federal Subsistence Hunting Regulation New Regulation**

### **Proposed by**

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**Proposal:** Request to add regulation for Unit 8 to allow for limited sales of handicraft from nonedible byproducts of legally harvested Brown Bear taken under the Federal subsistence harvest season. The sale of handicrafts may not constitute a significant commercial enterprise.

**Current Regulation:** There is currently no allowable sale of handicrafts from the nonedible byproducts of legally harvested bear in Unit 8.

**Change:** I would like the regulation to be written as follows: You may sell handicrafts, by consignment, from the nonedible byproducts of legally harvested Brown Bear taken under the Federal subsistence harvest season in Unit 8. The sale of handicrafts may not constitute a significant commercial enterprise and must comply with all applicable regulations for Brown Bear in Unit 8.

- Articles of handicraft made from nonedible byproducts may only be sold permanently, by consignment by the maker/artist.
- Each article must have bear registration permit # attached and must be permanently retained with the handicraft.
- If the nonedible byproduct was transferred (gifted), a signed wildlife transfer statement must be permanently retained with the handicraft.
- Prior to selling handicraft made from the hide or claw(s) not attached to a hide, they must be sealed by an authorized ADF&G representative. \* Note: a hide is the skin of a bear with the fur attached/intact.
- All consignment sales are restricted to within the United States.

**Explanation:** Residents of Kodiak Island have a long history of the customary & traditional harvesting of Brown bear for food and traditional handicraft. In the published journal, *Two Voyages to Russian America, 1802-1807* by G.I. Davydov writes, 'on Kad'iak sometimes two

or three people in a group creep up on an animal (bear) and fire arrows at it, and if it attacks them, they fight it off with spears.’ Davydov also notes that Kamleikas (rain parkas) are made from the intestines of whales, seals and bears and of the gut kamleikas, the best are from the bears (Davydov. Published 1977 from journals). The Alutiiq Museum, and local author and Kodiak Brown bear expert, Larry Van Dael, also have produced publications about the importance of traditional bear harvesting on Kodiak Island. In addition, many museums across the world hold collections of art that both depict bears and articles of clothing that, today, we would recognize as Native handicraft. The use of non-edible byproducts of bear for handicraft is well-documented in Kodiak and practices continue today.

The sale of handicraft from non-edible byproducts of legally harvested wildlife across all units is an established practice in Alaska, including the use of non-edible byproducts from brown bear. In many units, it is allowable to use the skin, hide, pelt, or fur, including claws (units 1-5, 9A-C, 9E, 12,17, 20, 22, 23, 24,25 and 26) and the skin, hide, pelt, fur, claws, bones, teeth & sinew (units 1-5) and skulls (Units 1,4 or 5). I wish to add allowable uses of all non-edible byproducts from legally harvested brown bear in Unit 8 for handicraft.

This regulation is not expected to significantly increase the take of brown bear in Unit 8, nor will it create a significant burden for USFWS or ADF&G for sealing, tagging and documentation of the byproducts and/or handicraft. About 200 bears are already killed through the State of Alaska by hunters and commercial big game guide services each year on Kodiak Island, this includes Alaska residents and non-residents, as well as international hunters.

In contrast, only 13 permits are possibly available, currently, for Federal Subsistence harvest on Kodiak Island and the fall season (Dec1-Dec 15) is shorter than the State hunt (Oct 25-Nov 30), further reducing the opportunity for successful harvest of bear. The bear populations and their habitats are healthy, and I don’t foresee any future issues with the conservation or management of bears.

‘Sales by consignment’ aims to limit commercial sales of handicraft and prevent bear byproduct sales from becoming a significant enterprise. It offers a one-time economic benefit to the artist, ensuring items cannot be resold, while legally facilitating the sale of traditional clothing and art for spiritual, ceremonial, and cultural purposes.

Handicraft regulations support the cultural expression of Alaskan people, particularly Alaska Natives, to continue making, buying, selling, and trading traditional work.