WP26–36 Executive Summary	
General Description	Wildlife Proposal WP26-36 requests to shorten the wolverine hunting season in Unit 9 to match the State season of Sep. 1–last day of Feb. *Submitted by: Bristol Bay Subsistence Regional Advisory Council.*
Proposed Regulation	**Unit 9—Wolverine Hunting** *Unit 9*—1 wolverine — *Sep. 1–~~Mar. 31~~ **Last day of Feb.*** **Unit 9—Wolverine trapping** *Unit 9 – No limit* — *Nov. 1 – Feb. 28*
OSM Preliminary Conclusion	**Neutral**
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Bristol Bay Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**None**

Draft Wildlife Analysis
WP26-36

ISSUE

Proposal WP26-36, submitted by the Bristol Bay Subsistence Regional Advisory Council (Council), requests to shorten the wolverine hunting season in Unit 9 to match the State season of Sep. 1–last day of Feb.

Proponent Statement

The proponent states that the Alaska Board of Game (BOG) adopted Proposal 22 at their January 2025 meeting to shorten the Unit 9 wolverine hunting season to close the last day of February, effective July 1, 2025. This proposal would maintain alignment of the State and Federal wolverine hunting season in Unit 9.

Current Federal Regulations

Unit 9—Wolverine Hunting

Unit 9—1 wolverine	*Sep. 1–Mar. 31*

Unit 9—Wolverine trapping

Unit 9 – No limit	*Nov. 1 – Feb. 28*

Proposed Federal Regulations

Unit 9—Wolverine Hunting

Unit 9—1 wolverine	*Sep. 1–~~Mar. 31~~* ***Last day of Feb.***

Unit 9—Wolverine trapping

Unit 9 – No limit	*Nov. 1 – Feb. 28*

Current State Regulations

Unit 9−Wolverine hunting

Unit 9	*Residents and Nonresidents −1 wolverine*	*Sept. 1−Last day of Feb.*

Unit 9−Wolverine trapping

Units 9	*Residents and Nonresidents –No limit*	*Nov. 10−Last day of Feb.*

Extent of Federal Public Lands

Unit 9 is comprised of approximately 55% Federal public lands that consist of 30% National Park Service (NPS), 22% U.S. Fish and Wildlife Service (USFWS), and 3% Bureau of Land Management (BLM) managed lands.

Customary and Traditional Use Determination

The Federal Subsistence Board (Board) has not made a customary and traditional use determination for wolverine in Unit 9. Therefore, all rural residents of Alaska may harvest this species in Unit 9.

Regulatory History

Federal regulations for wolverine hunting in Unit 9 were transferred from State regulations in 1990 when the Federal Subsistence Management Program began. The hunting season and harvest limit have remained the same since this time.

In January 2023, the Board adopted Proposal WP22-40 with modification, allowing a snowmachine to be used to approach and pursue a wolf or wolverine provided the snowmachine does not contact a live animal in Units 9B, 9C, and 17. This proposal recognized a customary and traditional practice in the Bristol bay Region; the modification mirrored the State regulatory language.

In 2025, the BOG adopted Proposal 22, shortening the wolverine hunting season in Unit 9 by changing the end date from March 31 to the last day of February. The BOG supported protecting wolverines during the denning season and aligning the close of the Unit 9 hunting season with the close of wolverine trapping season in four Unit 9 subunits (ADF&G 2025b).

Biological Background

Wolverines are present throughout Units 9, although no population estimates have ever been conducted (ADF&G 2025a). While quantitative data is scant, relative abundance has typically been estimated using the results of voluntary trapper questionnaires, as well as incidental observations by biologists, hunters, trappers, guides, and others (Crowley and Peterson 2020).

Compared to other furbearers, wolverines occur at low densities (Copeland and Whitman 2003). Though wolverine abundance remains unquantified due to the impracticality of formal assessment (Crowley 2013), low densities appear to be confirmed by local trappers, who report that wolverines in Units 9 and 17 are scarce but stable (Spivey 2019).

Wolverines give birth between February and April with 2–3 kits per litter (ADF&G 2025a). Female wolverines may have pups in their den and may be nursing at the end of February into March (ADF&G 2025b). Due to their low reproductive rates, wolverines can be susceptible to overharvest in heavily trapped areas with no neighboring refugia for a source population (ADF&G 2025b).

Cultural Knowledge and Traditional Practices

Across Alaska, both wolves and wolverines are highly prized for their fur, which is used to trim locally made parkas and other items of clothing or handicrafts. While not as prominent an activity as in the past, rural residents still participate in trapping as a source of income in the Bristol Bay region, particularly for wolverine, which continues to fetch a high price for quality fur (Woolington 2013). Snowmachines were the primary means of transportation used by hunters and trappers for taking wolves and furbearers in Unit 17 from 2008 through 2012 (Woolington 2012, 2013). Most wolverines were harvested by trap or snare between the regulatory years of 1992 and 2010.

The Division of Subsistence at ADF&G conducts household subsistence harvest surveys periodically throughout Alaska. Though this survey data is only available for some communities in some years, it is an additional source for documenting patterns of use in rural Alaska. The most recent surveys conducted in the Bristol Bay region describe the harvest and use of wolverines as varied between communities and study years (Evans et al. 2013; Holen et al. 2005; Holen et al. 2011; Holen et al. 2012; Krieg et al. 2009). A common pattern described in most reports is that a smaller percentage of households in each community report harvest or attempted harvest and use of furbearers than those reporting harvest and use of salmon or large land mammals like moose and caribou. In most cases only a few households are responsible for the majority of the harvest and use of furbearers, likely in association with keeping a trap line.

Harvest History

Wolverine harvest and trapper numbers have declined over that past decade, although fur prices and weather greatly influence trapper effort and success. Unit 9 harvest averaged 60 wolverines/year in the mid-1990s, but has declined to 17 wolverines per three year rolling average in recent years (2020-2023) (ADF&G 2025b). The number of successful trappers has also declined from 20-40 prior to 2000 to < 10 since 2020 (ADF&G 2025b).

Over the last five years (2019-2023), March has had the 3rd highest reported harvest as well as 40% of the harvest being comprised of females (**Figure 1**) (ADF&G 2025b). Between regulatory year (RY) 2012/13 and 2021/22, 10% of wolverine harvest in Unit 9 occurred in March on average (**Figure 2**) (Crowley and Peterson 2020). During this same timeframe, the highest annual percentage of

wolverines harvest in March was in RY 2012/13 with 19%. While in March of RY 2014/15 and 2015/16, no harvest of wolverines in Unit 9 was reported (Crowley and Peterson 2020).

Wolverine harvest can vary from year to year, reflecting trapper effort that varies with travel conditions. For 2007 – 2016, the most recent ten-year period for which unit-specific sealing data is available, reported harvest ranged from 9 to 36 wolverines in Unit 9. On average, annual reported harvest was 25 wolverines, 89% of which were trapped or snared, and 10% of which were shot. Snowmachines were used in 28% of wolverines harvested during this period (Crowley 2013; Rinaldi 2019, pers. comm.). Between 2019 and 2023, 23% of wolverines harvested during March in Unit 9 were shot (ADF&G 2025a).

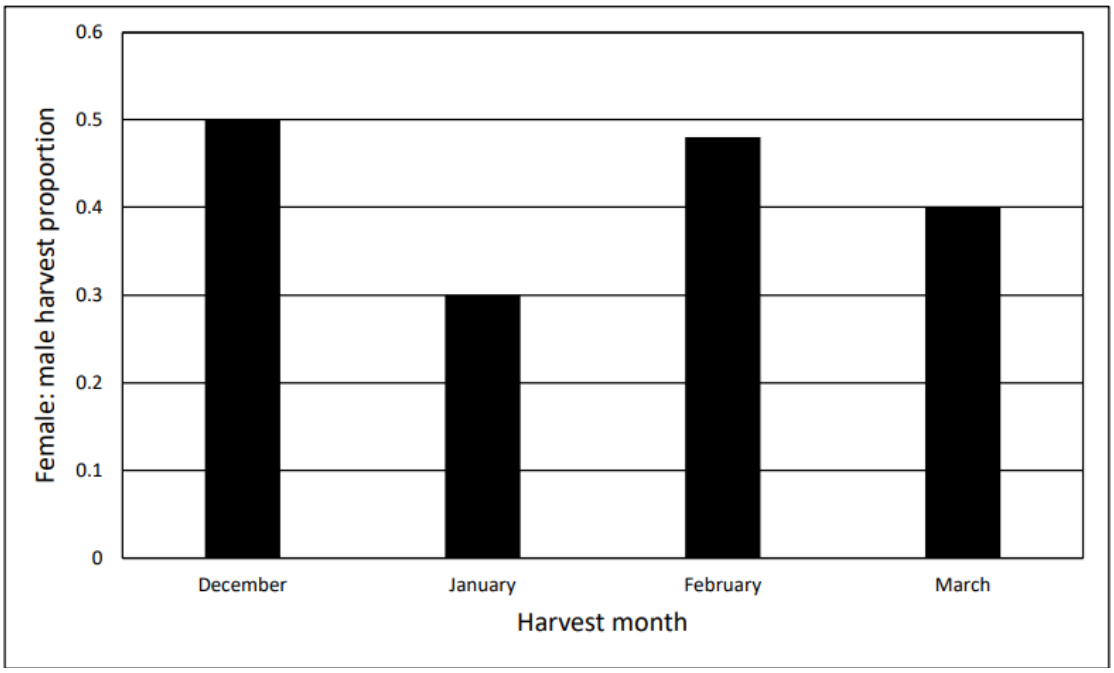

Figure 1. Ratio of female to male wolverines harvested in Unit 9, regulatory years 2010-2023 (ADF&G 2025a).

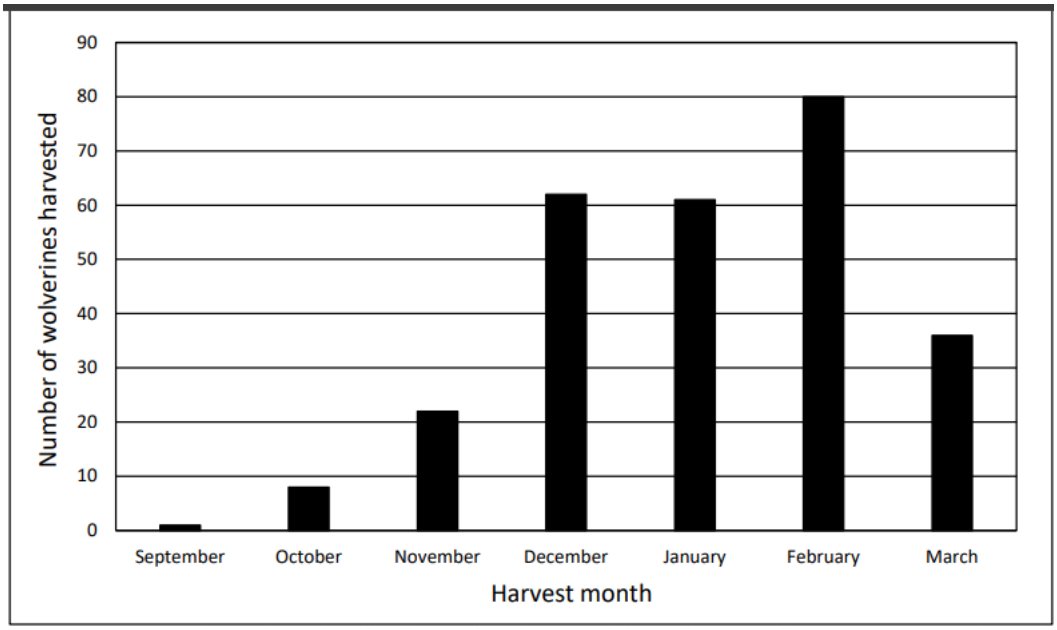

Figure 2. Total number of wolverines taken by month in Unit 9, regulatory years 2010-2023 (ADF&G 2025a).

Discussion and Effects

This proposal decreases subsistence opportunity for federally qualified subsistence users by shortening the Federal season for wolverines in Unit 9 by one month.

While there are currently no known conservation concerns for wolverines in Unit 9, wolverines occur in low densities and biological information is very sparse. Adopting this proposal may help protect denning females, which could help increase the population. In their comments to the BOG on Proposal 22, ADF&G wrote that, "With no trapper effort or wolverine population data, it is assumed the decline [in wolverine harvest] is due to lower trapper numbers and effort, rather than declining population abundance" (ADF&G 2025b).

Adopting this proposal would also decrease regulatory complexity and confusion by maintaining alignment between State and Federal regulations as directed by Executive Order 14153 3(b)(xxii) to "ensure to the greatest extent possible that hunting and fishing opportunities on Federal lands are consistent with similar opportunities on State lands."

OSM PRELIMINARY CONCLUSION

Neutral on Proposal WP26-36.

Justification

This proposal decreases subsistence opportunity for federally qualified subsistence users. While there are no apparent conservation concerns for Unit 9 wolverines, shortening the season could protect denning females and potentially, entire litters. However, reported harvest has declined and is very low.

LITERATURE CITED

ADF&G. 2025a. Alaska Department of Fish and Game Staff Comments for Proposals 1-23, 25-27, 29-38, 45-46, 51-54, 64-67, 70-79, and 81-84 Central / Southwest Region Proposals. Wasilla, AK. https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2024-2025/csw/dfg_comments-11.07.2024.pdf . 242pp. Retrieved: May 25, 2025.

ADF&G. 2025b. Alaska Board of Game meeting recording. https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=01-10-2025&meeting=wasilla. January 10-17, 2025. Wasilla, AK.

Copeland, J.P. and J.S Whitman. 2003. Wolverine. Pages 672 – 682 *in* G.A Feldhamer, B.C. Thompson and J.A. Chapman, eds. Wild mammals of North America: Biology Management and Conservation. The Johns Hopkins University Press, Baltimore, MD. 1216 pp.

Crowley, D.W. 2013. Unit 9 and 10 furbearer management report. Pages 129 – 137 *in* P. Harper and Laura A. McCarthy, eds. Furbearer management report of survey and inventory activities 1 July 2009– 30 June 2012. ADF&G. Juneau, AK.

Crowley, D.W., and C. Peterson. 2020. Furbearer management report and plan, Game Management Units 9 and 10: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-25, Juneau.

Evans, S., M. Kullonen, D. Holen, and D.S. Koster. 2013. The harvest and use of wild resources in Dillingham, Alaska, 2010. ADF&G, Div. of Subsistence Tech. Paper No. 375. Anchorage, AK.

Holen, D., J. Stariwat, T.M. Krieg, and T. Lemons. 2011. Subsistence harvests and uses of wild resources in King Salmon, Naknek, and South Naknek, Alaska, 2007. ADF&G, Div. of Subsistence Tech. Paper No. 360. Anchorage, AK.

Holen, D., J. Stariwat, T.M. Krieg, and T. Lemons. 2012. Subsistence harvests and uses of wild resources in Aleknagik, Clark's Point, and Manokotak, Alaska, 2008. ADF&G, Div. of Subsistence Tech. Paper No. 368. Anchorage, AK.

Holen, D., T.M. Krieg, R. Walker, and H. Nicholson. 2005. Harvests and uses of caribou, moose, bears, and Dall sheep by communities of Game Management Units 9B and 17, Western Bristol Bay, Alaska 2001-2002. ADF&G, Div. of Subsistence Tech. Paper No. 283. Anchorage, AK.

Krieg, T.M., D. Holen, and D Koster. 2009. Subsistence harvests and uses of wild resources in Igiugig, Kokhanok, Koliganek, Levelock, and New Stuyahok, Alaska, 2005. ADF&G, Div. of Subsistence Tech. Paper No. 322. Anchorage, AK.

Rinaldi, T. 2019. Fish and game coordinator. Personal communication: email. ADF&G. Palmer, AK.

Spivey, T.J. 2019. 2017 Alaska trapper reports: 1 July 2107 – 30 June 2018. ADF&G. Juneau, AK.

Woolington, J.D. 2012. Unit 17 wolf management report. Pages 221–226 *in* P. Harper, ed. Wolf management report of survey and inventory activities 1 July 2008– 30 June 2011. ADF&G, Species Management Report ADF&G/DWC/SMR-2012-4, Juneau, AK.

Woolington, J.D. 2013. Unit 17 furbearer management reports. Pages 222 – 242 *in* P. Harper and Laura A. McCarthy, eds. Furbearer management report of survey and inventory activities 1 July 2009– 30 June 2012. ADF&G. Juneau, AK.