WP26-12/13a/14a Executive Summary	
General Description	**WP26-12** requests that the Board recognize the customary and traditional use of brown bears in Unit 6 by residents of Cordova. *Submitted by: the Native Village of Eyak* **WP26-13a** requests that the Board recognize the customary and traditional use of brown bears in Unit 6 by residents of Cordova. *Submitted by: Dennis Zadra* **WP26-14a** requests that the Board recognize the customary and traditional use of brown bears in Unit 6 by residents of Chenega Bay and Tatitlek. *Submitted by: the Southcentral Alaska Subsistence Regional Advisory Council*
Proposed Regulation	WP26-12/13a ***Customary and Traditional Use Determination—Brown Bear*** *Unit 6* — ~~*No Federal subsistence priority*~~ ***Residents of Cordova*** WP26-14a ***Customary and Traditional Use Determination—Brown Bear*** *Unit 6* — ~~*No Federal subsistence priority*~~ ***Residents of Chenega Bay and Tatitlek***
OSM Preliminary Conclusion	**Support**
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	

WP26-12/13a/14a Executive Summary	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None

Draft Customary and Traditional Use Analysis
WP26-12/13a/14a

ISSUE

Proposal WP26-12, submitted by the Native Village of Eyak (NVE), and WP26-13a, submitted by Dennis Zadra, request that the Federal Subsistence Board (Board) recognize the customary and traditional use of brown bears in Unit 6 by residents of Cordova. Proposal WP26-14a, submitted by the Southcentral Alaska Subsistence Regional Advisory Council (Southcentral Council), requests that the Board recognize the customary and traditional use of brown bears in Unit 6 by residents of Chenega Bay and Tatitlek.

Proponent Statement

NVE, the proponent of WP26-12, states that the community of Cordova has a long history of brown bear use. NVE writes that this is "well documented in our local Cordova history and within the Tribe's traditional storytelling, which has been passed down through the generations of Eyak Tribal Members who have lived in the area since time immemorial." Dennis Zadra, the proponent of WP26-13a, states that residents of Cordova have a deep history of practicing subsistence for brown bears. The Southcentral Council, which submitted WP26-14a, states that subsistence hunting for brown bears is a time-honored practice for the communities of Chenega Bay and Tatitlek.

Because there is a "no Federal subsistence priority" determination for brown bears in Unit 6, this analysis will only consider whether the existing determination should be revised and expanded to include Cordova, Chenega Bay, and Tatitlek. Other communities are not considered in this analysis.

Companion Proposal WP26-13b/14b requests to establish a brown bear hunt in Unit 6 with a harvest limit of one bear by Federal registration permit and a season of Aug. 1—Jun. 30.

Current Federal Regulations

Customary and Traditional Use Determination—Brown Bear

Unit 6	*No Federal subsistence priority*

Proposed Federal Regulations

WP26-12/13a

Customary and Traditional Use Determination—Brown Bear

Unit 6	~~*No Federal subsistence priority*~~ ***Residents of Cordova***

WP26-14a

Customary and Traditional Use Determination—Brown Bear

Unit 6	~~*No Federal subsistence priority*~~ ***Residents of Chenega Bay and Tatitlek***

Extent of Federal Public Lands

Unit 6 is comprised of approximately 71% Federal public lands that consist of 49% U.S. Forest Service (USFS), 14% Bureau of Land Management (BLM), and 8% National Park Service (NPS) managed lands.

Regulatory History

When Federal subsistence management regulations were promulgated in 1992, they reflected customary and traditional use determinations carried over from State regulations. In Unit 6, there was a "no subsistence" determination for brown bear.

In 1996, the Board considered Proposal P96-03, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Southeast Council),which requested a customary and traditional use determination for brown bear in Unit 6A for residents of Unit 5, which includes the community of Yakutat. At its May 1996 meeting, the Board tabled the proposal in order to allow the Southeast Council to provide more information in support of the proposal. However, the proposal was never revisited. No other proposals related to customary and traditional uses of brown bears in Unit 6 have been submitted to the Board.

Background

Brown bears are located throughout most of Unit 6, "with the exception of the islands and mainland of western Unit 6D and Middleton Island in the Gulf of Alaska" (Westing 2022). They are common on Hinchinbrook, Montague, Hawkins, and Kayak islands. This distribution does not seem to have changed since at least 1910 and is influenced by the location of salmon rivers and streams (Westing 2022).

The community of Cordova is located on the eastern edge of Prince William Sound in Unit 6C, adjacent to the boundary with Unit 6D. Residents of Cordova already have customary and traditional use determinations for the following species and areas in Unit 6: black bears and wolves throughout the unit, goats in Units 6A, 6C, and 6D, and moose in Units 6A, 6B, and 6C. In addition, they are federally qualified to participate in many other hunts in Unit 6 that are open to all rural residents.

Chenega Bay and Tatitlek are located in Unit 6D. Chenega Bay is located in the southwestern portion of Prince William Sound, while Tatitlek is located in the northeastern portion of the Sound. Residents

of these two communities already have customary and traditional use determinations for several species within Unit 6, including: black bears and wolves throughout the unit, goats in Units 6C and 6D, and moose in Unit 6D. In addition, they are federally qualified to participate in many other hunts in Unit 6 that are open to all rural residents.

Residents of Cordova, Chenega Bay, and Tatitlek can currently hunt for brown bears in Unit 6 under State regulations only. There is no State subsistence hunt for brown bears in Unit 6. The State harvest limit for brown bears in Unit 6D, which encompasses Prince William Sound, is one brown bear every four regulatory years. The State harvest limit is more liberal to the east in Units 6A—C, where hunters can take one brown bear every regulatory year. Of the three communities, Cordova is best positioned to take advantage of the more liberal State brown bear harvest limit in these areas.

Eligibility requirements pertaining to national parks and monuments are subject to additional rules, which do not apply to national preserve lands. Only people living withing a national park or monument, people living in resident zone communities and those households holding subsistence use permits issued under 36 CFR 13.440 can hunt in national parks and monuments. Communities must have a customary and traditional use determination for a given species in the area and be resident zone communities for residents to be eligible to hunt that species in national parks and monuments.

A portion of Wrangell-St. Elias National Park (WRST) is located in Unit 6A. The resident zone communities for WRST park lands are: Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway/Northway Village/Northway Junction, Slana, Tanacross, Tazlina, Tetlin, Tok, Tonsina, and Yakutat.

If this proposal is adopted, residents of Chenega Bay, Tatitlek, and Cordova would be federally qualified to hunt brown bears on Federal public lands in Unit 6. However, they would not be eligible to hunt brown bears in the portion of Unit 6 that overlaps with WRST park lands, because Chenega Bay, Tatitlek, and Cordova are not resident zone communities for the park. However, the portion of WRST in Unit 6 is very remote and inaccessible.

Current Events

In July 2025, the Board adopted deferred Wildlife Proposal WP24-01 as modified by OSM in its revised conclusion (February 2025). Proposal WP24-01 requested to allow the sale of brown bear hides. The OSM modification was that the hides of brown bears, with or without claws attached, may be purchased within the United States for personal use only and may not be resold. The hunter must request an OSM Customary Trade Permit and must return the permit to OSM. The modification also eliminated regulations requiring the skin of the skull and claws of brown bear hides to be retained at the time of sealing in certain areas. The Board adopted the proposal as modified in deference to nine Councils. However, this regulation cannot be implemented until the Office of Management and Budget (OMB) approves the creation and use of the new OSM Customary Trade Permit.

Community Characteristics

The subsistence practices of the rural residents of Chenega Bay, Tatitlek, and Cordova, the communities included in the proposals, reflect the cultural traditions of the Chugach Sugpiaq (Alutiiq), the dAXunhyuu (Eyak), and Russian and American settlers (Birket-Smith and de Laguna 1938, Birket-Smith 1953, Clark 1984, Stratton and Chisum 1986, de Laguna 1990, Stratton 1990). The Chugach Sugpiaq (Alutiiq) people have lived in the Prince William Sound area for approximately 10,000 years (Clark 1984, Chenega Corporation 2022). The area now known as Cordova lies within the traditional territory of the dAXunhyuu (Eyak), and has long been utilized by the Chugach Sugpiaq (Alutiiq) (de Laguna 1990). The dAXunhyuu (Eyak) also interacted with the Yakutat Tlingit and the Ahtna Athabascans (Hansen 2025, pers. comm.). In the 19th century, the dAXunhyuu (Eyak) territory stretched from Cordova to the Copper River delta and eastwards to the Italio River, which includes areas now associated with the Tlingit (de Laguna 1990). Cordova, Chenega Bay, and Tatitlek have been shaped by multiple historical forces and events, including colonization—bringing disease, cultural displacement, and profound social change—as well as the fur trade, the growth of commercial fishing and canneries, mining, the 1964 great Alaska earthquake, and the 1989 Exxon Valdez oil spill (Davis 1984, Simeone and Miraglia 2000).

Cordova

Cordova occupies the area where the eastern shores of Prince William Sound meet the Copper River Delta, a location central to both the region's ecology and human history. Orca Inlet was named Puerto Cordoba by the Spanish in 1790 (ADCCED 2018). Two canneries opened in the area by the late 1880s, and many more followed in subsequent decades (Sherman 2012; Fall and Zimpelman 2016). Seasonal commercial fishing, clamming, cannery work, and fox farming became the dominant economic enterprises (Fall and Zimpelman 2016, Hansen 2025, pers. comm.). The population expanded in 1906, when the community became the terminus for the Copper River and Northwestern Railway which connected Cordova to the Kennecott Mine (Sherman 2012; Fall and Zimpelman 2016). Cordova was formally established in 1909 (ADCCED 2018). The mine closed in 1938, but many former workers remained in the town and participated in the commercial fisheries. The population again grew in the 1970s and 1980s with construction of the trans-Alaska pipeline (Keating et al. 2020). Today, there is a large local, State, and Federal government sector (Fall and Zimpelman 2016). In 2024, Cordova had an estimated population of 2,506 (ADLWD 2024). Commercial fishing and subsistence activities are considered central to the culture of the community (ADCCED 2018).

Chenega Bay

The traditional territory of the *Caniqerhmiut*[1] included western Prince William Sound below Port Wells; the original Chenega village (*Ing'im Acia*, "below the mountain") on Chenega Island was the principal *Caniqerhmiut* community (Stratton and Chisum 1986, Hansen 2025, pers. comm.). This old village site was destroyed by a tsunami triggered by the 1964 earthquake (Simeone and Miraglia

[1] Also known as the Cainqarmiut (Hansen 2025, pers. comm.)

2000). Survivors relocated to Tatitlek, Cordova, Valdez, and beyond (Stratton and Chisum 1986). A new village of Chenega Bay was later established on Evans Island, located about 15 miles to the south of the old village, and many of the original residents of Chenega moved to Chenega Bay in 1984 (Davis 1984, Hansen 2025, pers. comm.). In 2024, Chenega Bay had an estimated population of 54 (ADLWD 2024).

Tatitlek

The traditional territory of the *Taatiilaarmiut* included the northeastern portion of Prince William Sound. The village of Tatitlek (*Taatiilaaq*) is located on the northeast shore of the Tatitlek Narrows on the Alaska mainland in Prince William Sound. The community was relocated several times in the last half of the 19th century, moving to its present location in 1900 (Fall 2006, Fall et al. 2016). Unlike Chenega, Tatitlek was not heavily damaged by the 1964 earthquake and tsunami (Davis 1984). However, the 1989 Exxon Valdez oil spill occurred just 20 miles west of Tatitlek (Simeone and Miraglia 2000). In 2024, Tatitlek had an estimated population of 56, down from the 90 residents counted in the 2020 U.S. Census (ADLWD 2024).

Eight Factors for Determining Customary and Tradition Use

A community or area's customary and traditional use is generally exemplified through these eight factors: (1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area; (2) a pattern of use recurring in specific seasons for many years; (3) a pattern of use consisting of methods and means of harvest which are characterized by efficiency and economy of effort and cost, conditioned by local characteristics; (4) the consistent harvest and use of fish or wildlife as related to past methods and means of taking: near, or reasonably accessible from the community or area; (5) a means of handling, preparing, preserving, and storing fish or wildlife which has been traditionally used by past generations, including consideration of alteration of past practices due to recent technological advances, where appropriate; (6) a pattern of use which includes the handing down of knowledge of fishing and hunting skills, values, and lore from generation to generation; (7) a pattern of use in which the harvest is shared or distributed within a definable community of persons; and (8) a pattern of use which relates to reliance upon a wide diversity of fish and wildlife resources of the area and which provides substantial cultural, economic, social, and nutritional elements to the community or area.

The Board makes customary and traditional use determinations based on a holistic application of these eight factors (50 CFR 100.16(b) and 36 CFR 242.16(b)). In addition, the Board takes into consideration the reports and recommendations of any appropriate Regional Advisory Council regarding customary and traditional use of subsistence resources (50 CFR 100.16(b) and 36 CFR 242.16(b)). The Board makes customary and traditional use determinations for the sole purpose of recognizing the pool of users who generally exhibit some or all of the eight factors. The Board does not use such determinations for resource management or restricting harvest. If a conservation concern exists for a particular population, the Board addresses that concern through the imposition of harvest limits or season restrictions rather than by limiting the customary and traditional use finding.

In 2010, the Secretary of the Interior asked the Board to review, with Regional Advisory Council input, the customary and traditional use determination process, and present recommendations for regulatory changes. In June 2016, the Board clarified that the eight-factor analysis applied when considering customary and traditional use determinations is intended to protect subsistence use, rather than limit it. The Board stated that the goal of the customary and traditional use determination analysis process is to recognize customary and traditional uses in the most inclusive manner possible.

NVE is the authoritative source on their customary practices. As such, they affirm that brown bears have been traditionally used by their people. Ancestral knowledge, memory, and cultural continuity establish that the traditional use of brown bears is an integral part of dAXunhyuu (Eyak) and Chugach Sugpiaq (Alutiiq) heritage. Researchers beyond the Tribe have likewise demonstrated a deep record of brown bear use in the region.

The subsistence pattern of Prince William Sound residents focuses on the marine environment, a characteristic that extends far back into the archaeological record (de Laguna 1956, Clark 1984, Stratton and Chisum 1986, Stratton 1990, Tatitlek Corporation 2019, Chenega Corporation 2022). However, both brown and black bears were available and utilized around Prince William Sound (de Laguna 1956, Stratton 1990, Crowell et al. 2001). Bears, in addition to goats, were the largest and most important land mammals originally available in the region, as deer only became available in the twentieth century (Stratton 1990). Moose populations in most of Unit 6 were transplanted from other areas in Alaska in the mid-twentieth century (Crowley 2010). Brown and black bears and goats were the most important land animals hunted by the dAXunhyuu (Eyak) (Birket-Smith and de Laguna 1938). Birket-Smith writes that the Chugach Sugpiaq (Alutiiq) hunted brown and black bears “more occasionally” than goats, which were pursued regularly (Birket-Smith 1953:37).

Archaeological evidence in Prince William Sound demonstrates the deep history of the human-bear relationship. In the 1930s, Frederica de Laguna excavated two sites in Prince William Sound (de Laguna 1956). The first site is located on Hawkins Island and dates from 2250 BP until an unknown time after AD 1200 (USACE 2017). A second site dates from 750 to 1500 AD (64 FR 55622, October 18, 1999). Both sites have been found to be ancestral to present-day Chugach Sugpiaq (Alutiiq) (64 FR 55622, October 18, 1999).

Identification of faunal remains at the first site showed that, although sea mammal bones were three times as numerous as those of land mammals, among the latter, bear bones (both black and brown) were second only to marmot in their abundance (de Laguna 1956). Many artifacts from the site made of bear bone and teeth have been identified, including knife blades, awls, a drill rest, beads, and chisels (de Laguna 1956). Two small carved ivory bear figurines were excavated with a burial at the site, indicating their spiritual and cultural significance (de Laguna 1956).

Bear bones were also found in association with burials at the second site, including two pendants made from bear canines (de Laguna 1956). Testaments to the importance of bears to the Chugach Sugpiaq (Alutiiq) continued in the contact era: early European encounters with residents of Prince William Sound include an observation from the 1790s of Chugach Sugpiaq (Alutiiq) wearing wooden

helmets, some of which were carved into the shape of a bear (Sauer 1802, cited in de Laguna 1956). Both cultures produced sacred and traditional objects featuring bears, which are now housed in museums around the globe (Hansen 2025, pers. comm.).

Crowell et al. emphasize the cultural and symbolic importance of bears in the region, and their assessment is worth quoting:

> Bears…are prominent in Alutiiq legend and surrounded by a rich body of contemporary lore and hunting ritual…Some Alutiit believe that humans are descended from the animals, and many have noted bears' human-like characteristics, including occasional bipedalism and similar diet. Bear hunters also hold a special status in Alutiiq folklore (2001: 172).

Brown bears also feature in traditional dAXunhyuu (Eyak) stories (Birket-Smith and de Laguna 1938).

Traditionally, the Chugach Sugpiaq (Alutiiq) undertook bear hunting with great respect and spiritual preparation. The hunter was not supposed to brag or speak about the hunt ahead of time (Crowell et al. 2001), a stipulation also followed by the dAXunhyuu (Eyak) (Hansen 2025, pers. comm.). Crowell et al. noted that "in Prince William Sound, bears were traditionally addressed before any shots were fired, so the animal would not be offended. The hunter would say: "We do this because we need you" (Crowell et al. 2001: 174). Some Elders in the region have expressed concern about younger hunters forgetting these important rules (Crowell et al. 2001).

Snares, deadfall traps, spears and arrows were traditionally used to hunt bears (Crowell et al. 2001). Winter was a traditional time to harvest bears among both the Chugach Sugpiaq (Alutiiq) and the dAXunhyuu (Eyak); the bears were hunted in their dens (Birket-Smith and de Laguna 1938, Birket-Smith 1953). The dAXunhyuu (Eyak) used dogs to draw bears out (Birket-Smith and de Laguna 1938). Bears were also sometimes harvested in the spring (Crowell et al. 2001). Following the hunt, the placement of the bear skull was important for both the Chugach Sugpiaq (Alutiiq) and the dAXunhyuu (Eyak) (de Laguna 1990, Crowell et al. 2001). The former traditionally buried the skull where the bear was killed, facing inland, which had significance for the animal's future return (Crowell et al. 2001).

In Prince William Sound, hides were stretched on wooden frames and washed with a mixture of bear fat and spruce bark, then scraped, rubbed, and dried (Crowell et al. 2001). According to Stratton, "Prior to the 20th century, bear fur figured prominently in the Chugach material culture. Bear fur, including brown bear fur, was used in the construction of boots and mittens" (1990: 45). Oswalt reported that the Chugach made "hip-length boots from the entire leg and paw, with the claws intact, of a brown bear" (Oswalt 1967: 140). Bear skins were also used in parkas, trousers, and as bedding (Crowell et al. 2001). The dAXunhyuu (Eyak) also used bear hides for sleeping mats and for making boots (Birket-Smith and de Laguna 1938).

Bear intestines were used by both the dAXunhyuu (Eyak) and the Chugach Sugpiaq (Alutiiq) to make waterproof garments, such as rain parkas and bags (Birket-Smith and de Laguna 1938, Crowell et al. 2001). However, the Chugach Sugpiaq (Alutiiq) shared that the intestines of brown bears could only be

used this way when they were harvested in the spring, because by the fall the sharp bones from salmon damaged the intestines (Crowell at al. 2001).

Traditionally, the Chugach Sugpiaq (Alutiiq) share bear meat with elders and a hunter's extended family. Bear fat is considered particularly valuable. The ribs, front and hind quarters, and feet of brown bears are also saved (Crowell et al. 2001). However, "some communities today hunt more bears than others, and not everyone has a taste for it. Some consider the meat to be too strong in flavor, or too tough" (Crowell et al. 2001: 173). Some people are concerned about trichinosis (Stratton 1989). There are also traditional stipulations on which parts of brown bears should be eaten or not eaten by men and women (Crowell et al. 2001). Among the dAXunhyuu (Eyak), young people were not allowed to eat certain parts of bears, including the paws, liver, and kidney (Birket-Smith and de Laguna 1938).

Evidence of use of brown bears since 1900 is less available compared to the robust documentation of use of both black and brown bears in Prince William Sound in the archaeological and early ethnographic record. This is likely due in part to the introduction of deer and moose (Hansen 2025, pers. comm.). However, there is much more recent evidence for use of black bears than brown bears by residents of Chenega Bay and Tatitlek. Writing about Tatitlek, Stratton reports that "bear hunting in the 1900s focused almost exclusively on black bears" (1990: 46). In their study of subsistence in pre-earthquake Chenega, Stratton and Chisum (1986) found that in the early 1960s, no Chenega residents reported taking or using any brown bear. Black bears, however, were used extensively during the same time period. A text that includes interviews with Elders in the Chugach region about subsistence contains many mentions of black bear hunting, but none for brown bears (Tabios et al. 2000).

In recent decades, this proclivity for hunting black bears over brown bears may have been reinforced by State regulatory opportunities, which have been more liberal for black bears in Prince William Sound. Additionally, all three communities are eligible to hunt black bears under Federal subsistence regulations. Cordova, Chenega Bay, and Tatitlek have been surveyed by Alaska Department of Fish and Game (ADF&G) Division of Subsistence more intensively than many other Alaskan communities in the wake of the 1989 oil spill. Cordova households were surveyed for their use of brown bear seven times between 1985 and 2003 (Stratton 1989, 1990; Fall and Utermohle 1999; Fall 2006; ADF&G 2025). Cordova households were also surveyed in 2014 (Fall and Zimpelman 2016). During that survey, respondents were not specifically asked about brown bears, although Division of Subsistence would have recorded any mention of brown bear harvests; no brown bear harvests were documented in 2014 (Fall and Zimpelman 2016, Sill 2025, pers.comm.).

Brown bear hunting tends to be specialized, and it is possible that some households that harvested brown bears were not included in the surveys. **Table 1** shows that across survey years (excluding 2014), an average of approximately 4% of surveyed Cordova households attempted to harvest brown bears, and 1% of households were successful. In comparison, over the same period of time, an average of 6% of surveyed Cordova households attempted to harvest black bear, and 2% of surveyed households were successful in harvesting black bear (ADF&G 2025). An average of 12 brown bears per year were harvested by Cordova as a whole across survey years, or 0.7 pounds of brown bear per person (ADF&G 2025, **Table 1**). An average of 1.4% of surveyed households used brown bear during

survey years (ADF&G 2025, **Table 1**). During the same time period, an average of about 7% of surveyed households used black bears (ADF&G 2025). During the 1985 survey year, the only year for which information about brown bear search locations is available from a subsistence survey of Cordova, residents hunted brown bears in areas accessible from roads, as well as in Port Gravina in Unit 6D and Cape Yakataga in Unit 6A (Stratton 1989).

During all the years in which households in Chenega Bay and Tatitlek were surveyed for their use of brown bears between 1984 and 2003, no households reported harvesting or using brown bears (ADF&G 2025, **Tables 2** and **3**). Chenega Bay was surveyed for its use of brown bears seven times during this period, and Tatitlek was surveyed for brown bear use five times (ADF&G 2025). During a 2014 survey respondents were not specifically asked about brown bears, although Division of Subsistence would have recorded any mention of brown bear harvests; no brown bear harvests were documented (Fall and Zimpelman 2016, Sill 2025, pers.comm.).

Some brown bear harvest effort was documented for Chenega Bay in two survey years. Just over 6% of surveyed households attempted to harvest brown bears in both 1984 and 2003 (ADF&G 2025, **Table 2**). However, no information is available about where Chenega Bay households attempted to harvest brown bears during these years (ADF&G 2025). No brown bear harvest effort was documented in any survey year for Tatitlek (ADF&G 2025, **Table 3**).

In contrast to the lack of documented brown bear harvest and use, during the same period of time, surveyed households in Chenega Bay and Tatitlek reported harvesting and using black bears in almost every study year (ADF&G 2025). An average of 21% of surveyed Chenega Bay households attempted to harvest black bears in survey years between 1985 and 2003, and 16% were successful; 30% of households used black bears (ADF&G 2025). In surveys of Tatitlek between 1987 and 2003, an average of 7% of surveyed households attempted to harvest black bears and 5% were successful; 15% of households used black bear (ADF&G 2025).

One of the eight factors considered in customary and traditional use determinations pertains to diversity of fish and wildlife resources harvested by communities, and whether this harvest contributes significantly to the cultural, economic, social, and nutritional life of a community. The Division of Subsistence comprehensive survey data shed light on this factor. The Division of Subsistence considers 2014 to be the most representative survey year for all three communities.

In 2014, Cordova households harvested an average of seven different kinds of resources and used an average of ten different resources, resulting in an estimated harvest of 116 pounds of wild food per person (Fall and Zimpelman 2016). The most important resources in terms of pounds of edible weight harvested were moose, salmon, berries, and deer (ADF&G 2025). Deer, moose, and black bears were harvested on the mainland and islands near Cordova, as well as on Montague Island, the Copper River Delta, and Controller Bay (ADF&G 2025). The survey did not document brown bear harvest in 2014 (Fall and Zimpelman 2016, ADF&G 2025).

Households in Chenega Bay harvested an average of 11 kinds of resources and used an average of 18 kinds of resources in 2014, resulting in an estimated harvest of 255 pounds of wild food per person,

more than twice the harvest documented the same year in Cordova (Fall and Zimpelman 2016). Salmon, halibut, moose, rockfish, and deer were the most important resources in terms of pounds of edible weight harvested (ADF&G 2025). All resources were harvested in the Chenega Bay or old Chenega areas (Fall and Zimpelman 2016).

Tatitlek households harvested an average of seven kinds of resources and used an average of ten kinds of resources in 2014, resulting in an estimated harvest of 294 pounds of wild food per person, the highest harvest the three communities (Fall and Zimpelman 2016). Compared to Cordova and Chenega Bay, Tatitlek relied more heavily on marine mammals. The most important resources in terms of edible weight were harbor seals, salmon, stellar sea lions, halibut, and deer (ADF&G 2025). Tatitlek households searched for fish throughout the waters and islands of Prince William Sound, on the mainland near Tatitlek, and in the waters south of Cordova and the Copper River delta (Fall and Zimpelman 2016).

Table 1. Four measures of estimated brown bear use by surveyed Cordova households, 1985 to 2003 (ADF&G 2025). The 2014 survey year was not included because households were not specifically asked about brown bears.

Survey Year	Percentage of surveyed households using brown bear	Percentage of surveyed households attempting to harvest brown bear	Percentage of surveyed households harvesting brown bear	Estimated number of brown bears harvested by residents of Cordova	Estimated pounds of brown bear harvested per person
1985	2.9%	5.8%	1.9%	29	1.1
1988	0.9%	4.9%	0.9%	8	0.0
1991	1.0%	5.0%	1.0%	8	0.0
1992	0.0%	0.0%	0.0%	0	0.0
1993	0.0%	1.0%	0.0%	0	0.0
1997	2.4%	6.3%	2.4%	26	0.8
2003	2.3%	4.4%	1.0%	13	0.2
Average	**1.4%**	**3.9%**	**1.0%**	**12**	**0.7**

Table 2. Four measures of estimated brown bear use by surveyed Chenega Bay households, 1984 to 2003 (ADF&G 2025). The 2014 survey year was not included because households were not specifically asked about brown bears.

Survey Year	Percentage of surveyed households using brown bear	Percentage of surveyed households attempting to harvest brown bear	Percentage of surveyed households harvesting brown bear	Estimated number of brown bears harvested by residents of Chenega Bay
1984	0.0%	6.3%	0.0%	0
1990	0.0%	0.0%	0.0%	0
1991	0.0%	0.0%	0.0%	0
1992	0.0%	0.0%	0.0%	0
1993	0.0%	0.0%	0.0%	0
1997	0.0%	0.0%	0.0%	0
2003	0.0%	6.3%	0.0%	0
Average	**0.0%**	**1.8%**	**0.0%**	**0**

Table 3. Four measures of brown bear use by surveyed Tatitlek households, 1990 to 2003 (ADF&G 2025). The 2014 survey year was not included because surveyed households were not specifically asked about brown bears.

Survey Year	Percentage of surveyed households using brown bear	Percentage of surveyed households attempting to harvest brown bear	Percentage of surveyed households harvesting brown bear	Estimated number of brown bears harvested by residents of Tatitlek
1990	0.0%	0.0%	0.0%	0
1991	0.0%	0.0%	0.0%	0
1993	0.0%	0.0%	0.0%	0
1997	0.0%	0.0%	0.0%	0
2003	0.0%	0.0%	0.0%	0
Average	**0.0%**	**0.0%**	**0.0%**	**0**

Reported Harvest under State Regulations

As described earlier, residents of Cordova, Chenega Bay, and Tatitlek can currently hunt for brown bears in Unit 6 under State regulations. In areas surrounding Chenega Bay and Tatitlek in Unit 6D, the harvest limit is one brown bear every four regulatory years. In Units 6A—C, the area to the east of Cordova, hunters can take one brown bear every regulatory year. **Table 4** shows that between 1998 and 2023, residents of Cordova harvested a total of 169 brown bears in Unit 6, averaging 6.5 bears per year, with most harvest occurring in Units 6B and 6C (Westing 2025, pers. comm., **Table 4**). During this same time, residents of Chenega Bay and Tatitlek did not report harvesting any brown bears within Unit 6 (Westing 2025, pers.comm.). There are no brown bear sealing records for Chenega Bay in Unit 6 for any year in ADF&G's records; two brown bears were sealed for residents of Tatitlek in Unit 6, one in 1984 and one in 1985 (Westing 2025, pers. comm.).

Table 4. Reported brown bear harvest by residents of Cordova in Unit 6 hunting under State regulations, 1998 to 2023 (Westing 2025).

Year	Unit 6A	Unit 6B	Unit 6C	Unit 6D	Unit 6 Total
1998	3	6	4	2	**15**
1999	3	2	4	0	**9**
2000	2	3	3	0	**8**
2001	1	3	2	0	**6**
2002	3	1	4	0	**8**
2003	3	2	1	1	**7**
2004	1	1	2	0	**4**
2005	1	3	1	1	**6**
2006	1	2	1	0	**4**
2007	2	6	2	1	**11**
2008	2	8	1	1	**12**
2009	2	3	4	1	**10**
2010	0	3	4	0	**7**
2011	0	0	5	2	**7**
2012	0	3	1	0	**4**
2013	0	0	3	0	**3**
2014	0	1	2	0	**3**
2015	0	2	2	0	**4**
2016	1	0	2	1	**4**
2017	1	1	3	1	**6**
2018	0	4	3	1	**8**
2019	0	1	2	1	**4**
2020	0	2	0	3	**5**
2021	0	3	1	1	**5**
2022	0	2	3	0	**5**
2023	0	2	2	0	**4**
Total	**26**	**64**	**62**	**17**	**169**
Average	**1.0**	**2.5**	**2.4**	**0.7**	**6.5**

Discussion and Effects

If these proposals are adopted, residents of Cordova, Chenega Bay, and Tatitlek will have their customary and traditional uses of brown bear recognized in Unit 6. They will become federally qualified to harvest brown bears under Federal subsistence regulations on Federal public lands in Unit 6, contingent upon the establishment of a Federal brown bear season in the unit (WP26-13a/14a). If these proposals are not adopted, residents of the three communities can continue to harvest brown bears under State regulations in Unit 6.

OSM PRELIMINARY CONCLUSION

Support Proposals WP26-12/13a/14a.

Justification

There is strong ethnographic and archaeological evidence that both brown and black bears played a central role in Chugach Sugpiaq (Alutiiq) and dAXunhyuu (Eyak) material and symbolic culture prior to the 19th century. Excavated sites in Prince William Sound have revealed evidence of human use of brown bears dating back thousands of years. Bears were the largest and most important land animals available in the region, and were hunted for food as well as for raw materials. There is clear evidence of a long-term pattern of use of brown bears in alignment with the eight factors through the 19th century.

Since 1900, there appears to have been a shift towards greater use of black bears compared with brown bears, particularly for residents of Chenega Bay and Tatitlek. The reasons for interruption in use of brown bears are not clear. Evidence of consistent use of brown bears since 1900 is absent or unavailable for Chenega Bay and Tatitlek. ADF&G Division of Subsistence research in the old village of Chenega showed no use of brown bears during the 1960s. Between 1984 and 2003, the Division of Subsistence conducted numerous surveys of households in Chenega Bay, and Tatitlek. There has been no documented harvest or use of brown bears by households in Chenega Bay or Tatitlek in any survey year, although about 6% of surveyed Chenega Bay households attempted to harvest brown bears in two separate survey years.

Cordova was also surveyed by ADF&G Division of Subsistence multiple times between 1985 and 2003. An average of about 4% of surveyed Cordova households attempted to harvest brown bears across all survey years, and an average of 1.4% of surveyed households used brown bears over the same period. Brown bear hunting tends to be specialized, and it is possible that some households that harvested brown bears were not included in surveys of the three communities. State harvest records show that an average of 6.5 brown bears per year were harvested in Unit 6 by residents of Cordova between 1998 and 2023, but there were no documented brown bear harvests in Unit 6 by residents of Chenega Bay or Tatitlek during this time.

Although there is minimal evidence of contemporary use of brown bears, particularly for Chenega Bay and Tatitlek, subsistence practices are characterized by their adaptability, and shifting use of brown and black bears may reflect both local preference and external constraints. For example, State hunting regulations are more liberal for black bears than for brown bears in Unit 6D, which encompasses Prince William Sound. Currently, the State limit in Prince William Sound is one brown bear every four regulatory years.

Under Federal subsistence regulations, residents of Cordova, Chenega Bay, and Tatitlek already have a customary and traditional use determination for black bears throughout Unit 6. Based on this and other determinations for land mammals in the region, the three communities have already established a recognized pattern of harvest and use of wild resources in Unit 6 consistent with the eight factors. At

the fall meeting of the Southcentral Council, local residents will have the opportunity to provide additional testimony about their use of brown bears in Unit 6, which will further inform this analysis.

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