

WP26–11 Executive Summary	
General Description	Proposal WP26-11 requests the closure of Federal public lands on Hawkins Island and Hinchinbrook Island in Unit 6D to hunting for black bears by non-federally qualified users and to require a Federal registration permit. <i>Submitted by: Native Village of Eyak</i>
Proposed Regulation	<p style="text-align: center;">Unit 6—Black Bear</p> <p style="text-align: center;"><i>1 bear. In Unit 6D, a State Federal registration permit is required</i></p> <p style="text-align: center;"><i>Federal public lands on Hawkins Island and Hinchinbrook Island in Unit 6D are closed to black bear hunting, except by federally qualified subsistence users hunting under these regulations.</i></p>
OSM Conclusion	Oppose
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	Oppose
Interagency Staff Committee Comments	The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.
ADF&G Comments	Oppose
Written Public Comments	None

Draft Wildlife Analysis WP26-11

ISSUE

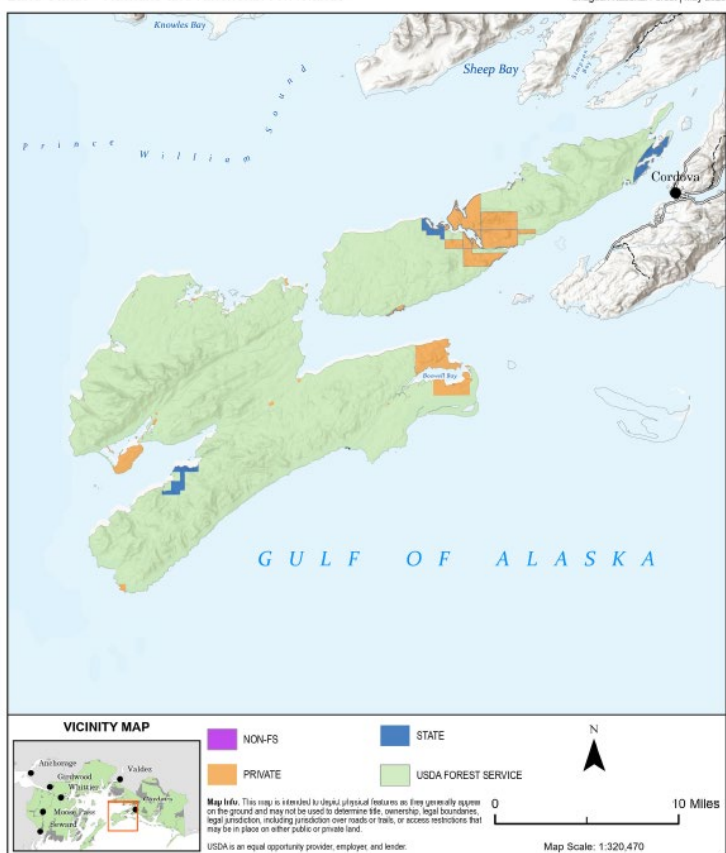
Proposal WP26-11, submitted by the Native Village of Eyak, requests to close Federal public lands on Hawkins Island and Hinchinbrook Island in Unit 6D to hunting for black bears by non-federally qualified users and require a Federal registration permit (**Map 1**).

Proponent Statement

The proponent requests that Hawkins Island and Hinchinbrook Island in Unit 6D be closed to the harvest of black bears by non-federally qualified users. The proponent states that federally qualified subsistence users from Cordova are not meeting their subsistence needs for black bear due to increased harvest pressure from non-federally qualified users in Eastern Prince William Sound (PWS). The proponent notes that while no population estimates exist for black bear in PWS, harvest data suggest they are overharvested and in decline.



Land Status - Hawkins and Hinchinbrook Islands Chugach National Forest | May 2025



Map 1. Hawkins and Hinchinbrook Islands, with surface ownership indicated by color.

Current Federal Regulations

Unit 6—Black Bear

1 bear. In Unit 6D, a State registration permit is required

Sep. 1-June 30.

Proposed Federal Regulations

Unit 6—Black Bear

*1 bear. In Unit 6D, a ~~State~~ **Federal** registration permit is required*

Sep. 1-June 30.

Federal public lands on Hawkins Island and Hinchinbrook Island in Unit 6D are closed to black bear hunting, except by federally qualified subsistence users hunting under these regulations.

Current State Regulations

Unit 6D— Black Bear

Residents and Nonresidents Unit 6D— 1 bear every regulatory year, by permit RL065 Sep. 10 - June 10 available online or in person in Anchorage, Cordova, Fairbanks, Glennallen, Palmer, and Soldotna beginning Aug. 22

Extent of Federal Public Lands

Unit 6D is comprised of approximately 75% Federal public lands that consist of 73% U.S. Forest Service (USFS) managed lands and 2% Bureau of Land Management (BLM) managed lands.

Hawkins and Hinchinbrook Islands in Unit 6D are comprised of approximately 93% Federal public lands consist entirely of U.S. Forest Service (USFS) managed lands that are part of Chugach National Forest.

Customary and Traditional Use Determination

Rural residents of Units 6C and 6D (excluding residents of Whittier) have a customary and traditional use determination for black bear in Unit 6 remainder, which includes Unit 6D.

Regulatory History

In 1990, the Federal Subsistence Board (Board) adopted temporary black bear seasons and harvest limits in Unit 6 that were identical to those of the State (1 bear, Sep. 1 – June 30). In 1996, the Board adopted Proposal P96-16 with modification to expand the customary and traditional use determination in Unit 6 remainder (excludes Unit 6A) to residents of Units 6C and 6D. The modification was to exclude Whittier. The Alaska Department of Fish and Game (ADF&G) then submitted Request for Reconsideration R96-04 and R97-04 to restore the previous customary and traditional use determination for black bear in Unit 6D, which recognized only Chenega Bay and Tatitlek; the Board rejected both requests.

On June 7, 2000, the Anton Anderson Memorial Tunnel opened to vehicle traffic, allowing road vehicle traffic from the Anchorage road system to access Prince William Sound. The harvest of black bears in Unit 6D had been slowly increasing in the four years prior to the tunnel opening, but harvest and effort began to increase much more substantially after the tunnel opened (Crowley 2002). Increases in effort were primarily driven by an increase in the number of nonlocal resident hunters, but nonresident hunters had the greatest relative increase (Crowley 2002). Increases in the number of nonresident hunters continued to outpace growth in the number of nonlocal resident hunters over time (Crowley 2005). In the following years, the Alaska Board of Game (BOG) took several actions to manage black bear harvest in Unit 6D. In 2003, the BOG closed Unit 6D to the shooting of black bears from boats. In 2005, the BOG shortened the State season dates in 6D from Sep. 1 – June 30 to Sep. 1 – June 10. In 2009, the BOG again shortened the season to reduce black bear harvest in Unit 6D by delaying the start date to Sep. 10. That year, the BOG also started requiring harvest tickets to better track black bear harvest and effort.

In 2014, the Board adopted proposal WP14-09 to lengthen the Federal bear baiting season in Unit 6D by an additional two weeks in June, closing June 30 instead of June 15. This was in deference to the Southcentral Alaska Subsistence Regional Advisory Council (Council), which noted that some subsistence users were not able to harvest bears because the season closed early when many bears were still in their dens.

The next year, in 2015, the BOG adopted Proposal 210 to convert the black bear hunt in Unit 6D from a harvest ticket to a registration hunt to better assess and control harvest and address concerns that black bears were being overharvested in Unit 6D. The first year of the registration hunt, ADF&G closed the Unit 6D black bear hunt early on May 27 in response to a steady decline in the black bear population and a tripling of the harvest between the 1990s and 2007, along with a marked decrease in harvest in 2012 and 2013. In addition, the percentage of females in the harvest had exceeded management goals since 2006.

Additionally, on May 19, 2015, Wildlife Special Action WSA15-09, submitted by ADF&G, requested that the Federal subsistence black bear season close on May 27, the same effective date as the Emergency Order issued by the State. They also requested that the Federal Unit 6D black bear permit required from June 11 through June 30 be extended to begin on May 27, so that federally qualified

subsistence users would hunt in compliance with both State and Federal permit requirements. This special action request was unanimously approved by the Board with modification, temporarily extending the dates of the Unit 6D Federal subsistence black bear season from May 27, 2015, through June 30, 2015, because of the small number of black bears harvested by federally qualified rural residents.

In 2016, the Board adopted Proposal WP16-13 with modification to require the use of a State registration permit for black bear in Unit 6 and include the Federal season on the permit to reduce regulatory complexity.

In 2022, the Board rejected Proposal WP22-14 to increase the harvest limit for black bears in Unit 6 from 1 bear to 2 bears. The proposal was rejected primarily because of a conservation concern in Unit 6C along the Cordova Road System, but the State also noted concerns that the regulation would have a negative impact on the recovery of the Unit 6D black bear population.

Biological Background

Black bears are very uncommon on Hawkins and Hinchinbrook islands. Overall, black bears are common in PWS, but they are predominantly found on and near the mainland in the Western Sound; whereas, Hawkins and Hinchinbrook islands are on the extreme eastern side of the Sound and host small populations of brown bears. Black bears are also uncommon on many of the other smaller islands in the Central and Eastern Sound, and neither black nor brown bears are known to inhabit Naked Island (McIlroy 1970; Modafferi 1978, 1982, Westing 2022). However, there are no accurate population data for black bears in Unit 6.

Harvest monitoring and assessment has been the primary method used to assess the status of the black bear population in Unit 6. In 2009, the BOG required the use of harvest tickets that incorporated an assessment of effort in addition to the harvest (Crowley 2011). Based on harvest data and effort as well as local knowledge and observation, black bear populations in Unit 6 are understood to fluctuate due to the severity of winter weather, food abundance, hunting pressure and, in some areas, competition with and predation by brown bears (McIlroy 1970, Schwartz et al. 1986).

Since the late 1980s, ADF&G has been using the skull size as a biological objective because it is thought that these changes may indicate changes in population size, harvest composition, and the sustainability of harvest levels. A decreasing skull size may indicate a decline in older bears in the population, which may be indicative of a population decline (Lowell 2011). To assess the population age structure, which is a measure of population health, skull size and harvest densities are compared between eight geographic areas that correspond to well-defined watersheds within Unit 6 (Crowley 2011). During the period 1988 to 2017, the density of bears harvested on Hawkins and Hinchinbrook islands was listed as “N/A” (Westing 2022).

The State management goal for black bear in Unit 6 is to maintain a black bear population that will sustain a 3-year average annual harvest of 200 bears composed of at least 75% males with a minimum average skull size of 17 inches (Crowley 2011). The proportion of females taken exceeded the

recommended management objective of 25% every year from 2006 through 2014 except for 2008, and exceeded 200 bears every year from 1998 through 2012 (Westing 2022). After this extended period of high harvest and high female harvest, hunter success and total harvest declined dramatically, down to 91 bears in 2015 (Westing 2021, pers. comm.) and was also associated with a decrease in mean skull size and age of the male bears harvested.

More recently, total black bears sealed has again exceeded 200 bears annually since 2018, exceeding 500 bears in 2023. The percentage of females in the harvest exceeded 25% of the sealed bears in 2022 and 2023 (Westing & Fowler pers. comm. 2025). Mean male bear skull size has not shown a significant decrease in response to these high harvest levels and mean male skull size has exceeded 17" since 2020 (Westing & Fowler pers. comm. 2025). These high harvests suggest the Unit 6 black bear population is abundant, although the high percentage of females in the harvest may indicate unsustainable harvest. However, using this harvest information as an index for population status applies to all of Unit 6 and is not specific to Hawkins and Hinchinbrook Islands, the focus of this proposal.

Cultural Knowledge and Traditional Practices

The subsistence practices of the rural residents of Cordova 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 PWS area for approximately 10,000 years (Clark 1984). 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 Itilio River, which includes areas now associated with the Tlingit (de Laguna 1990). Cordova has 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).

Both brown and black bears were available and utilized in PWS (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). Archaeological evidence in Prince William Sound demonstrates the deep history of the human-bear relationship. In the 1930s, Frederica de Laguna excavated sites in Prince William Sound (de Laguna 1956). One site is located on Hawkins Island and dates from 2250 BP until an unknown time after AD 1200 (USACE 2018). The site has been found to be ancestral to present-day Chugach Sugpiaq (Alutiiq) (64 FR 55622, October 18, 1999).

Identification of faunal remains at the 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).

Winter and spring was a traditional time to harvest bears among both the Chugach Sugpiaq (Alutiiq) and the dAXunhyuu (Eyak) (Birket-Smith and de Laguna 1938, Birket-Smith 1953, Crowell et al. 2011). Snares, deadfall traps, and spears and arrows were traditionally used to hunt bears (Crowell et al. 2001). Following the hunt, the placement of the bear skull was important for both groups (de Laguna 1990, Crowell et al. 2001). The Chugach Sugpiaq (Alutiiq) traditionally buried the skull where the bear was killed, facing inland, which had significance for the animal's future return (Crowell et al. 2001).

According to Stratton, “prior to the 20th century, bear fur figured prominently in the Chugach material culture. Bear fur was used in the construction of boots and mittens” (1990: 45). Bear skins were also used in parkas, trousers, and as bedding (Crowell et al. 2001). 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). Traditionally, the Chugach Sugpiaq (Alutiiq) share bear meat with elders and a hunter's extended family. Bear fat is considered particularly valuable. According to Crowell et al., “some communities today hunt more bears than others, and not all Alutiiq people have a taste for it. Some consider the meat to be too strong in flavor, or too tough” (2001: 173). Some people are concerned about trichinosis (Stratton 1989, Simeone 2008).

ADF&G Division of Subsistence has surveyed Cordova many times between 1985 and 2014 (ADF&G 2025)¹. These surveys seek to capture all subsistence harvest by surveyed households during a single study year under any opportunity, State or Federal. Across all survey years, on average of 5% of surveyed Cordova households attempted to harvest black bears and 2% were successful. For comparison, over the same period, an average of 4% of surveyed Cordova households attempted to harvest brown bears, with 1% being successful (ADF&G 2025). An average of 6% of surveyed Cordova households used black bears during each survey year, and black bears were given and received by a small percentage of households. On average, Cordova harvested 21 black bears per survey year, resulting in about half a pound of black bear per person per year (ADF&G 2025).

Simeone (2008) found that Cordova residents harvested black bears opportunistically, especially during the spring when they were out boating and fishing:

One person noted that bears were easily hunted from a boat because they did not expect danger from the water. He said that in the past, bears were easy to sneak up on because people were

¹ One year of survey data (1997) was excluded due to discrepancies.

using oars instead of outboard motors. At the time of the interview, he said that hunters were reducing noise by using electric trolling motors to sneak up on black bears (Simeone 2008:7).

Evidence of local subsistence users harvesting black bears in Unit 6D is limited, and there is no readily available information about locals harvesting black bears from Hawkins and Hinchinbrook islands. Simeone (2008) lists the areas described by key informants from Cordova as black bear hunting areas. Neither Hawkins nor Hinchinbrook islands are mentioned (Simeone 2008). However, later he notes:

Opinions varied on the black bear populations of Hawkins and Hinchinbrook islands. One respondent said there were no black bears on Hawkins or Hinchinbrook islands. However, another person said that he observed the expansion of black bears onto Hinchinbrook and Hawkins islands: “I think what’s happening is the bigger bears are pushing the smaller ones out, and they’re just working their way over to Hawkins Island. We never use to hardly ever see black bear on Hawkins” (Simeone 2008: 12).

Additionally, a Cordova resident stated that black bear guiding had occurred on Hawkins Island (Simeone 2008).

As part of their subsistence surveys, ADF&G Division of Subsistence often documents a community’s search and use areas for species during the study year. In both 1985, the first year Cordova was surveyed, and 2014, the most recent survey year, households’ reported black bear search areas did not include Hawkins or Hinchinbrook islands (Stratton 1989, Fall and Zimpelman 2016). Information about Cordova’s black bear search areas are not available for the remaining survey years (Stratton 1992, Fall 2006, ADF&G 2025). Additionally, a search of Southcentral Council transcripts from 2000 to 2025 did not show any Council discussion of black bears on Hawkins or Hinchinbrook islands.

Simeone’s (2008) report gives context to the lack of documented black bear hunting by residents of Cordova on Hawkins and Hinchinbrook islands. Prince William Sound key informants interviewed by Simeone indicated that in the 1940s and 1950s, black bears were an important subsistence food, but “Sitka black-tailed deer [had] replaced black bears as the primary land mammal taken for subsistence purposes” (Simeone 2008: 7). At the same time, the number of non-locals coming to Prince William Sound for hunting and tourism had increased significantly. Residents of Cordova observed a greater number of transporters taking hunters into remote areas of the Sound to hunt wildlife, including black bears. According to Simeone (2008), between 1986 and 2006, almost 90% of black bear harvests in Unit 6 were by nonresidents of Prince William Sound, with harvest concentrated in 6D.

Although black bears became less important as deer were increasingly targeted for subsistence by local residents, Cordova residents also avoided hunting in areas used by non-locals. Simeone summarized the situation:

The primary issue raised by many of those interviewed for this project was the increased presence of nonresidents hunting in Prince William Sound. This factor shaped their contemporary subsistence uses because they saw residents as competing directly for scarce resources with nonresidents, and they observed that the presence of a large numbers of

nonresidents frightened the game and made the animals more difficult to find (Simeone 2008: 14).

Harvest History

Black bear harvest in Unit 6D is by State registration permit RL065 under both State and Federal regulations. Sealing is also required.

Effort by federally qualified subsistence users to harvest black bears in Unit 6D is low. Between 2020 and 2023 an average of 5.5 federally qualified subsistence users obtained registration permits for black bear in Unit 6D each year (Westing & Fowler 2025, pers. comm.). Success by federally qualified subsistence users over the same time period was relatively low and variable (0%-43%) compared to non-federally qualified users (41% to 45%) (Westing & Fowler 2025, pers. comms.) However, it is likely common for local federally qualified subsistence users to apply for a permit for the ability to opportunistically harvest a bear secondary to other activities as opposed to non-local hunters who are more likely to travel to PWS for the primary purpose of harvesting a bear.

Between 2010 and 2023, total reported black bear harvest from Unit 6D ranged 91-487 bears/year with the highest harvest occurring in 2023. Over the same time period, FQSU harvest ranged from 0-7 bears/year, averaging 2 bears/year. Since 2010, federally qualified subsistence users have been responsible for about 1% of the reported black bear harvest in Unit 6D on average (**Table 1.**)

No bears have been reported as harvested from Hawkins or Hinchinbrook Islands since harvest reporting began in 2009 (Westing & Fowler 2025, pers. comm.).

Table 1. Black Bear reported harvest in Unit 6D from 2010-2023. Reported harvest is slightly fewer than the number of sealed bears for all years that data was available. Bears may be sealed without being part of the reportable harvest for many reasons such as defense of life and property, vehicle strikes, and illegal harvest (Westing 2021, pers. comm., Westing & Fowler 2025, pers. comm.). Federally qualified subsistence users (FQSUs) include rural residents of Units 6C and 6D (excluding residents of Whittier).

Year	Total by FQSU	Total 6D Harvest	% Harvested by FQSU
2010	1	453	0.2%
2011	7	467	1.5%
2012	2	357	0.6%
2013	3	188	1.6%
2014	0	105	0%
2015	1	91	1.1%
2016	4	140	2.3%
2017	2	212	0.9%
2018	3	201	1.5%
2019	1	221	0.5%
2020	3	323	0.9%
2021	2	339	0.6%
2022	0	466	0%
2023	1	487	0.2%
Average	2.1	289.3	0.9%

Discussion and Effects

If Proposal WP26-11 is adopted, black bear hunting on the Federal public lands of Hawkins and Hinchinbrook islands in Unit 6D would be closed to non-federally qualified users, and a Federal registration permit would be required for federally qualified subsistence users to hunt black bear under Federal regulations in Unit 6D.

Per §815(3) of ANILCA, restriction on nonsubsistence uses are only authorized when necessary for the conservation of healthy wildlife populations or to continue subsistence uses. This proposal does not meet either of these criteria. Currently there are no conservation concerns for black bear unit-wide in Unit 6D as evidenced by high and increasing harvests since 2015, and large skull sizes. While the high percentage of females in the harvest in recent years merits some caution, the prohibition on the take of cubs and sows with cubs under both State and Federal regulations helps protect the reproductive component of the population. Additionally, there is limited evidence that black bear have previously been established on Hawkins and Hinchinbrook islands.

The proposed closure is not necessary to continue subsistence uses. While federally qualified subsistence user harvest of black bear in Unit 6D is extremely low relative to non-federally qualified users harvest, FQSU effort to harvest black bears is also very low, and again, black bears do not typically occur on Hawkins or Hinchinbrook islands.

The requirement of a Federal registration permit would increase the administrative burden on federally qualified subsistence users, requiring them to obtain and carry two permits while hunting black bear instead of just one. It would also increase the administrative burden on managers to issue and track the Federal permits and would complicate harvest reporting.

OSM CONCLUSION

Oppose Proposal WP26-11.

Justification

Black bears are exceedingly uncommon on Hinchinbrook and Hawkins islands. This appears to be because of competition with brown bears and other natural processes, and not because of overharvest or development. There have been no reports of black bears harvested on those islands in the last 15 years since harvest reporting began. Any black bear harvest occurring on the islands is likely to be opportunistic in nature. Most people interviewed for subsistence studies have reported not seeing black bears on Hinchinbrook and Hawkins islands. Closing the islands to harvest by non-federally qualified users would represent an unnecessary restriction on them and would not provide a meaningful subsistence priority or address a conservation concern. Requiring a Federal permit increases the administrative burden on users and managers and complicates harvest reporting.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

Southcentral Alaska Subsistence Regional Advisory Council

Oppose. The Council noted that members who have direct knowledge of this area have never seen black bears on the island and this regulation change and closure do not seem appropriate at this time.

INTERAGENCY STAFF COMMITTEE COMMENT

The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.

ALASKA DEPARTEMENT OF FISH AND GAME COMMENT

Oppose. No comment submitted.