

<b>WP26–13b/14b Executive Summary</b>	
<b>General Description</b>	Wildlife 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. <i>WP26-13b was submitted by: Dennis Zadra of Cordova. WP26-14b was submitted by: Southcentral Alaska Subsistence Regional Advisory Council</i>
<b>Proposed Regulation</b>	<b>Unit 6—Brown bear</b>  <i>Unit 6—1 bear by Federal registration permit only. Aug. 1—June 30</i>
<b>OSM Conclusion</b>	<b>Support</b> Proposal WP26-13b/14b <b>with modification</b> to divide Unit 6 into two hunt areas, and delegate authority to the Cordova District Ranger to set or adjust annual harvest quotas determine the type of permits, and limit the number of permits issued in Unit 6D.
<b>Southcentral Alaska Subsistence Regional Advisory Council Recommendation</b>	<b>Support</b> as <b>modified</b> by OSM.
<b>Interagency Staff Committee Comments</b>	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.
<b>ADF&amp;G Comments</b>	<b>Oppose</b>
<b>Written Public Comments</b>	<b>None</b>

**Wildlife Analysis  
WP26-13b/14b**

**ISSUE**

Wildlife Proposal WP26-13b, submitted by Dennis Zadra of Cordova, and Wildlife Proposal WP26-14b, submitted by the Southcentral Alaska Subsistence Regional Advisory Council (Council), request 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.

**Note:** Wildlife Proposal WP26-13a requests to recognize the customary and traditional uses (C&T) of brown bear in Unit 6 by the residents of Cordova. Wildlife Proposal WP26-14a requests to recognize C&T for brown bear in Unit 6 by the residents of Chenega and Tatitlek.

**Proponent statement**

Both proponents state that the time-honored subsistence practices of brown bear harvest in Prince William Sound date far back. Most of Prince William Sound consists of Federal public lands, many of which contain robust brown bear populations that can withstand limited Federal harvest and provide for subsistence opportunity.

**Current Federal Regulations**

**Unit 6—Brown bear**

*None*

**Proposed Federal Regulations**

**Unit 6—Brown bear**

*Unit 6—1 bear by Federal registration permit only.*

*Aug. 1—June 30*

## Current State Regulations

### Unit 6—Brown bear

<i>Unit 6A, 6B, 6C</i>	<i>Residents and Nonresidents: One bear every regulatory year</i>		<i>Sep. 1—June 10</i>
<i>Unit 6D, Monague Island</i>	<i>Residents and Nonresidents: One bear every four regulatory years, by permit available online or in person in Anchorage, Cordova, Fairbanks, Glennallen, Palmer, and Soldotna beginning Oct. 3 and Mar. 12.</i>	<i>RB100</i>	<i>Oct. 15—Dec. 13</i>
		<i>RB101</i>	<i>Apr. 1—May 25</i>
<i>Unit 6D, remainder</i>	<i>Residents and Nonresidents: One bear every four regulatory years</i>		<i>Oct. 15—May 25</i>

## Extent of Federal Public Lands

Unit 6 is comprised of approximately 75% Federal public lands that consist of 54% U.S. Forest Service (USFS), 15% Bureau of Land Management (BLM), and 7% National Park Service (NPS) managed lands.

## Customary and Traditional Use Determination

There is no Federal subsistence priority for brown bears in Unit 6.

Wrangell-St. Elias National Park has 23 resident zone communities: Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Slana, Tazlina, Tanacross, Tetlin, Tok, Tonsina, and Yakutat.

*Under the guidelines of Alaska National Interest Lands Conservation Act (ANILCA), National Park Service regulations identify qualified local rural subsistence users in National Parks and National Monuments by: (1) identifying Resident Zone Communities that include a significant concentration of people who have customarily and traditionally used subsistence resources on park lands; and (2) identifying and issuing subsistence use (13.440) permits to individuals residing outside of the Resident Zone Communities who have a personal or family history of subsistence use within the park or monument.*

## **Regulatory History**

In 1990, when the Federal subsistence management program began, State brown bear regulations for Unit 6 were not adopted into Federal regulations as brown bears were not considered a subsistence resource.

In the early 1990s, State brown bear seasons were shortened in response to increasing hunting pressure and a suspected declining population. In 1992, the brown bear season in Unit 6D excluding Montague (Unit 6D remainder) was reduced to October 1 - May 31 (ADF&G 2023a).

In 1994, the fall season in Unit 6D was further reduced to Oct. 15-May 15 due to concerns of overharvest. Also in 1994, the Alaska Board of Game (BOG) closed the brown bear hunt on Montague Island in Unit 6D in response to declining harvest and suggestive survey data. While other portions of Unit 6 had increasing or stable harvest, harvest on Montague Island had been declining, and was identified as an area of concern in 1989 (ADF&G 2023a).

In 1996, the Board considered Proposal P96-03, submitted by the Southeast Council and the “State Regional Council,” which requested a customary and traditional use determination for brown bear in Unit 6A for residents of Unit 5, including 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.

Beginning in 1997 for resident hunters, and in 2001 for all hunters, the Alaska Board of Game (BOG) changed the State harvest limit for brown bears in Units 6A, 6B, and 6C from 1 bear every 4 years to 1 bear per year. Harvest was believed to be conservative, and bears were thought to be potentially preying upon moose calves to a limiting degree as well as on dusky Canada geese. Also in 1997, the Unit 6D season was extended to May 25 (Westing 2022).

In 2023, the BOG rejected Proposal 63, which requested extending the brown bear season in Unit 6D remainder to open October 1. ADF&G opposed the proposal due to insufficient population data and high current harvests. Bear harvest would likely increase in early October as bears are conspicuous and concentrated near salmon streams (ADF&G 2023a, 2023b).

## **Current Events**

Wildlife Proposals WP26-12/13a/14a, request to recognize the customary and traditional uses of brown bear by residents of Cordova, Chenega, and Tatitlek. These proposals would need to be adopted by the Board for WP26-13b/14b to be considered.

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.

### **Biological Background**

Brown bears can be found throughout most of Unit 6, including Hinchinbrook, Montague, Hawkins, and Kayak islands, and the portion of Unit 6D east of Columbia Glacier to Icy Bay on the mainland. Streams with consistent salmon runs largely influence brown bear distribution. Moose were intentionally introduced in the Copper River Delta in the 1950s. This introduction and continued spread of moose has provided an additional food source for brown bears, and may influence Unit 6 brown bear abundance. Historically, logging in portions of Units 6A and 6D, between 1969 and 2008, may have negatively impacted the brown bear population (Westing 2022).

During the 1980s through the 2000s, track and den surveys suggested the brown bear population on Hinchinbrook and Montague Islands may have been increasing. However, these surveys were discontinued as they are not very accurate. Hinchinbrook Island is likely within a high-density range (>175 bears/1,000 km<sup>2</sup>), while Montague Island likely has a medium density of brown bears (40–175 bears/1,000 km<sup>2</sup>) (Westing 2022).

While biological data is sparse, Unit 6 brown bear population numbers were probably stable from 2014-2018 (Westing 2022). As no population data exists for brown bears in Unit 6, a conservative approach to managing them is warranted (ADF&G 2023a).

Management objectives for Unit 6 brown bears include (Westing 2022):

- Maintain seasons and bag limits that would provide a unit wide 3-year average harvest of 35—65 bears, which will be considered within each calendar year.
- Manage for a 3-year average of less than 40% female bears.

### **Cultural Knowledge and Traditional Practices**

Please see the analysis for Wildlife Proposal WP26-12/13a/14a.

### **Harvest History**

No permits or harvest tickets are required to hunt brown bears in Units 6A, 6B, 6C or 6D remainder under State regulations, while a registration permit is required to hunt brown bears in Unit 6D, Montague Island. All harvested brown bears are required to be sealed within 30 days of kill, providing harvest information.

Brown bears may be easier to hunt earlier in the season when they are still utilizing salmon streams (ADF&G 2023a). The State season in Unit 6D opens October 15, in part, due to concerns of overharvest when bears are concentrated near salmon streams earlier in the month (ADF&G 2023a).

From Regulatory Year (RY) 2014-2023, Unit 6 brown bear harvest averaged 50 bears, which is less than the previous 10-year average of 60 bears, but within the management objective. Reported nonhunting kills, which include defense of life and property (DLP), agency take, and vehicle collisions, ranged from 1-6 per year from 2014-2023, averaging 2.8 bears/year. The number of bears killed illegally or wounded and not retrieved is unknown (Westing 2022).

Most bears in Unit 6 are harvested in Units 6D and 6A (**Table 1**). Unit 6A harvest primarily occurs by participants that are guided. Unit 6D has more participation by nonlocal Alaskans who hunt without a guide. Within Unit 6D, the mainland and eastern portion of Prince William Sound (not including the Valdez Arm) typically experience the highest bear harvests. Hinchinbrook Island experiences the second highest level of harvest (Westing 2022). From 2012-2021 in Unit 6D remainder, brown bear harvest averaged 19 bears. Harvest showed an increasing trend in Unit 6D remainder over this time period (ADF&G 2023b).

Nonresidents and nonlocal residents take most of the brown bears harvested in Unit 6, accounting for 88% of the harvest between 2014 and 2023. Nearly all who hunt in Unit 6A are nonresidents (86% from 2014-2018). Local residents (residents of Unit 6, including the non-rural community of Valdez) take a small percentage of the harvest in Unit 6 and hunt primarily in Units 6B, 6C, and 6D (**Table 1**). Unit-wide, local residents harvested an average of 6.2 bears per year from 2014-2023 accounting for 12% of the harvest during this time period. Nonlocal Alaska residents most commonly pursue bears in Unit 6D, accounting for 21% of the brown bear harvest unit wide from 2014-2018 (**Table 1**; Westing 2022).

Harvest of females can vary considerably from year to year and between units. The proportion of females in the average harvest in all of Unit 6 from 2014-2023 was 28%, which is slightly less than the 2004-2013 average of 33%, and within the management objective (Westing 2022).

Unit wide, harvest is evenly distributed between the spring and the fall, but varies among subunits. Most harvest in Unit 6A takes place in the fall by hunters pursuing moose or goats. Conversely, most harvest in Unit 6D takes place in the spring. In Units 6B and 6C, harvest is evenly distributed between the fall and spring. Peak brown bear harvests typically occurred during September and May between 2014 and 2018 (Westing 2022).

**Table 1.** Unit 6 brown bear harvest by subunit and residency and percent females in the harvest. “Non” includes nonlocal resident and nonresident harvest. “Local” includes harvest by Unit 6 residents (Westing 2025 pers. comm).

Year	6A		6B		6C		6D		Total Harvest	% Females
	Non	Local	Non	Local	Non	Local	Non	Local		
2014	11	0	1	1	4	2	17	3	39	36
2015	21	0	2	2	1	2	18	0	46	26
2016	18	2	5	0	4	2	14	1	46	28
2017	13	1	4	1	1	2	19	4	45	22
2018	18	0	8	4	1	3	18	1	53	34
2019	7	0	2	1	3	2	8	3	26	35
2020	26	0	4	2	3	1	20	5	61	28
2021	23	0	4	3	2	1	25	2	60	23
2022	42	0	5	2	2	3	23	0	77	26
2023	12	2	4	2	2	0	23	2	47	21
<b>Average</b>	19.1	0.5	3.9	1.8	2.3	1.8	18.5	2.1	50	29.2

### Alternative(s) Considered

One alternative considered was to delegate authority to a Federal in-season manager to limit the number of permits issued. This could be through first-come, first-serve registration permits or through random draw permits. Permits could also be limited by subunit, requiring division of Unit 6 into multiple hunt areas. For example, permits in Unit 6D could be limited, while permits for the other subunits would not be.

As no population data exists for brown bears in Unit 6, a conservative approach to managing them is warranted. While local residents harvest few bears under State regulations, the proposed Federal season is longer than existing State seasons and the harvest limit is higher for Unit 6D. The Federal season would open August 1 throughout Unit 6, while the State season opens September 1 in Units 6A, 6B, and 6C, and October 15 in Unit 6D. Brown bear harvest during early October and September may be higher as bears are concentrated near salmon streams and deer hunters may harvest a brown bear opportunistically while deer hunting or if a brown bear threatens their deer kill.

As this proposal establishes a new subsistence opportunity, participation in the hunt is uncertain. Limiting the number of permits provides a safeguard against overharvest and balances subsistence opportunity with conservation concerns.

### Discussion and Effects

If Proposals WP26-13b/14b are adopted, a Federal brown bear hunt would be established in Unit 6, increasing subsistence opportunity. However, there is currently no Federal subsistence priority for

brown bears in Unit 6. Because it is the Board's practice to establish a pool of eligible users prior to establishing a Federal hunt, Proposals WP26-12/13a/14a to recognize C&T for brown bear by residents of Cordova, Chenega, and Tatitlek would need to be adopted before Proposals WP26-13b/14b could be considered.

Impacts to the brown bear population is uncertain as there is little biological information regarding brown bears in Unit 6. The prohibition on the take of cubs and sows with cubs under both State and Federal regulations would help protect the reproductive component of the population and promote recruitment. Federal users may already harvest brown bears on most Federal lands in Unit 6 under State regulations, although the Federal season requested in these proposals is longer than existing State seasons, and the requested harvest limit is higher for Unit 6D. If adopted, users could still not harvest brown bears within Wrangell-St. Elias National Park (WRST) in Unit 6A as Cordova, Chenega, and Tatitlek are not resident zone communities of WRST. This is not expected to affect subsistence opportunity as these NPS lands are extremely remote and difficult to access.

While the information available does not indicate any serious conservation concerns, ADF&G has recommended against adopting regulations that may increase harvest in Unit 6D in recent years (ADF&G 2023a, 2023b). However, brown bear harvest by local residents of Unit 6 under State regulations has been extremely low, averaging only 6.2 bears/year (compared to the total average harvest of 50 bears/year). In addition to Cordova, Tatitlek, and Chenega, there are two other communities located in Unit 6: Valdez, which is non-rural, as well as the rural community of Whittier, which was not included in the C&T determination proposal for brown bear in Unit 6. Therefore, the harvest of brown bear by federally qualified subsistence users of Cordova, Tatitlek and Chenega (assuming Proposals WP26-12/13a/14a are adopted) is even lower than the 6.2 bear/year average.

However, much of the local resident harvest has primarily occurred in Units 6C and 6B, suggesting residents of Cordova account for most of the local resident harvest due to their proximity to these areas. As the harvest limit in Unit 6D under State regulations is one bear every four regulatory years, harvest by federally qualified subsistence users may increase in Unit 6D if a Federal hunt is established with a more liberal harvest limit of one bear per year. Residents of Chenega are expected to harvest more bears on Montague Island due to their proximity to that area. Montague Island has been an area of conservation concern since 1989 and is managed more conservatively than the rest of Unit 6D under State regulations, requiring a registration permit.

Another consideration is the longer Federal season requested in these proposals. Brown bears may be easier to harvest in September and early October when they are concentrated near salmon streams and opportunistic harvest by deer hunters is more likely. Therefore, the State season does not open until October 15 in Unit 6D, while peak brown bear harvests typically occur during September in Units 6A, 6B, and 6C (Westing 2022). Having an open Federal season in Unit 6D from Aug. 1-Oct. 14 with a one bear per year harvest limit may increase harvest to unsustainable levels, especially on Montague Island. As this is a new hunt, participation is uncertain, although overall harvest pressure is expected to be low.

## OSM CONCLUSION

**Support** Proposal WP26-13b/14b **with modification** to divide Unit 6 into two hunt areas, and delegate authority to the Cordova District Ranger to set or adjust annual harvest quotas determine the type of permits, and limit the number of permits issued in Unit 6D.

The draft regulations read:

### **Unit 6—Brown bear**

*Units 6A, 6B, 6C—1 bear by Federal registration permit only. Aug. 1—June 30*

*Unit 6D—1 bear by Federal permit only. Aug. 1—June 30*

*The Cordova District Ranger after coordination with ADF&G, OSM, BLM Glennallen Field Office (for BLM affected lands), and the Chair of affected Council(s) is authorized within the regulatory parameters set by the Board to set or adjust annual harvest quotas, determine the type of permits, and determine the number of permits to be issued.*

## **Justification**

This proposal increases subsistence opportunity. Harvest pressure is expected to be very low, and there are no conservation concerns for Units 6A, 6B, and 6C as users may already harvest one bear every year on Federal public lands in these subunits from Sept. 1-June 10 under State regulations. The additional Federal subsistence opportunity during August and late June is not expected to substantially increase harvests and provides a subsistence priority.

Limiting the number of permits issued for Unit 6D balances subsistence opportunity with conservation concerns and provides a safeguard against overharvest. The proposed Federal hunt in Unit 6D has a much longer season and higher harvest limit than the existing State hunts in Unit 6D. The State hunts limit harvest to one bear every four regulatory years with seasons opening October 15 and closing May 25 to limit unsustainable harvests as September and May represent the months of peak brown bear harvest in Units 6A, 6B, and 6C. A longer Federal season and higher harvest limit in Unit 6D provides for a Federal subsistence priority, and limiting the number of permits issued protects against overharvest and addresses conservation concerns.

## LITERATURE CITED

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## **SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION**

### **Southcentral Alaska Subsistence Regional Advisory Council**

**Support WP26-13b/14b as modified by OSM.** A federal hunt needs to be established, especially since a state hunt is already allowed. The Council expressed concern over brown bear populations in the unit, but noted that the requested harvest limit of one bear is reasonable and conservative. Providing additional subsistence opportunities is important, and the Federal manager can assess in-season how best to manage the hunt in Unit 6D.

### **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

### Wildlife Proposal WP26-13b/14b

These proposals both seek to establish a brown bear hunt in Game Management Unit (GMU) 6 with a harvest limit of one bear by Federal registration permit.

### Position

The Alaska Department of Fish & Game (ADF&G) OPPOSES this proposal as the Alaska Board of Game (BOG) has already established a negative C&T determination for brown bears in GMU 6 and the proposed hunting season deviates from state regulations and therefore is contrary to Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and recent directives from the President and Secretary of the Interior because it is not necessary.

ANILCA §1314(a) explicitly states: "Nothing in this Act is intended to enlarge or diminish the responsibility and authority of the State of Alaska for management of fish and wildlife on the public lands except as may be provided in Title VIII..." Title VIII provides only a narrow exception allowing the Secretary to restrict State-authorized harvest when necessary to meet the needs of federally qualified rural residents. Section 802(2) establishes the policy that "nonwasteful subsistence uses of fish and wildlife and other renewable resources shall be the priority consumptive use of all such resources on the public lands of Alaska **when it is necessary to restrict taking in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such population...**" [emphasis added]. Section 804 reiterates this policy and establishes criteria to implement a priority when the above conditions are met. It does not authorize wholesale replacement of State management. 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."

Executive Order 15153, Sec. 3(b)(xxii) directs the Department of the Interior to conduct meaningful consultation with State fish and wildlife agencies prior to enacting land management plans or regulations affecting hunting and fishing opportunities on public lands. This directive was reinforced by Secretarial Order 3447, which calls for removing unnecessary barriers to hunting and fishing, expanding access where compatible, improving coordination with State agencies, and ensuring transparent review of any proposed restrictions.