

WP26–24 Executive Summary	
General Description	Wildlife proposal WP26-24 requests to increase the brown bear harvest limit to 2 bears in Unit 11. <i>Submitted by: Eastern Interior Alaska Subsistence Regional Advisory Council</i>
Proposed Regulation	Unit 11—Brown bear <i>Unit 11—1 2 bears</i> <i>Aug. 10—Jun. 15</i>
OSM Conclusion	Support
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	Support
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	Take no action and defer to home region (Comment only)
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	1 support See Written Public comments on Wildlife Proposal and Closure Reviews section of the meeting book or www.doi.gov/subsistence/wildlife/public_comments for full comments.

**Wildlife Analysis
WP26-24**

ISSUE

Wildlife Proposal WP26-24, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council (Council), requests to increase the harvest limit for brown bear in Unit 11 from one to two bears.

PROPONENT STATEMENT

The proponent states that this proposal would provide additional opportunity for federally qualified subsistence users, and that there are no conservation concerns for brown bears in this unit.

Current Federal Regulations

Unit 11—Brown bear

Unit 11—1 bear

Aug. 10—Jun. 15

Proposed Federal Regulations

Unit 11—Brown bear

Unit 11—~~1~~ 2 bears

Aug. 10—Jun. 15

Relevant Federal Regulations

§100.25(j) Utilization of fish, wildlife, or shellfish.

(2) If you take wildlife for subsistence, you must salvage the following parts for human use:

(ii) The hide and edible meat of a brown bear, except that the hide of brown bears taken in Units 5, 9B, 17, 18, portions of 19A and 19B, 21D, 22, 23, 24, and 26A need not be salvaged;

Current State Regulations

Unit 11–Brown bear

<i>Unit 11</i>	<i>Residents and Nonresidents: One bear every regulatory year</i>	<i>Aug. 10—June 30</i>
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Relevant State Regulations

5 AAC 92.220

You must salvage the entire hide (with claws attached) and skull of a brown/grizzly bear unless it was taken in (and not removed from) one of the subsistence hunt areas under a subsistence Registration permit.

Extent of Federal Public Lands

Unit 11 is comprised of approximately 89% Federal public lands that consist of 86% National Park Service (NPS), 2% U.S. Forest Service (USFS), and <1% Bureau of Land Management (BLM) managed lands.

Customary and Traditional Use Determination

Rural residents of Chistochina, Chitina, Copper Center, Gakona, Glennallen, Gulkana, Kenny Lake, Mentasta Lake, Slana, Tazlina, Tonsina, and Units 11 and 12 have a customary and traditional use determination for brown bear in Unit 11, north of the Sanford River.

Rural residents of Chistochina, Chitina, Copper Center, Gakona, Glennallen, Gulkana, Kenny Lake, Mentasta Lake, Nabesna Road (mileposts 25-46), Slana, Tazlina, Tok Cutoff Road (mileposts 79-110), Tonsina, and Unit 11 have a customary and traditional use determination for brown bear in Unit 11, remainder.

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.

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.

However, these resident zone communities must also have a customary and traditional use determination for brown bears in the area to be eligible to hunt them within the park. In Unit 11 north of the Sanford River, the following communities meet both criteria: Chistochina, Chitina, Copper Center, Gakona, Glennallen, Gulkana, Kenny Lake, Mentasta Lake, Slana, Tazlina, Tonsina, McCarthy, Tanacross, Tetlin, and Tok. In Unit 11 remainder, the following communities meet both criteria: Chistochina, Chitina, Copper Center, Gakona, Glennallen, Gulkana, Kenny Lake, Mentasta Lake, Slana, Nabesna, Tazlina, Tonsina, and McCarthy.

Regulatory History

Prior to 1999, there was no Federal hunt for brown bear in Unit 11. In 1990, when the Federal subsistence management program began, State brown bear regulations for Unit 11 were not adopted into Federal regulations as brown bears were not considered a subsistence resource.

In 1999, the Federal Subsistence Board (Board) adopted Proposal P99-004 to establish a brown bear hunt in Unit 11 with a harvest limit of one bear Sept. 1–May 31. Brown bear populations appeared to be healthy and abundant, and establishing a season allows subsistence users to utilize this customary and traditional resource.

In 2003, the Board adopted Proposal WP03-13 to extend the Unit 11 brown bear season to Aug. 10–June 15 to match the current State season. Brown bear populations appeared to be stable, healthy and abundant. The proposal provided additional subsistence opportunity and decreased regulatory complexity by aligning State and Federal regulations.

In 2015, the Alaska Board of Game (BOG) adopted Proposal 93, allowing brown bears to be taken at registered bait stations in Unit 11. This was done to provide users additional opportunity and because there were no biological concerns for brown bears in Unit 11 (ADF&G 2015).

In 2016, the Board adopted Proposal WP16-18 as part of the consensus agenda to allow brown bears to be hunted over bait in Unit 11 Apr. 15–June 15. Both the Eastern Interior and Southcentral Councils supported the proposal to provide additional subsistence opportunity and because there were no conservation concerns. They commented any increases in harvest were expected to be small.

In 2018, the BOG adopted Proposal 112 as amended to extend the closing date of the brown bear hunting season in Unit 11 to June 30th. The amendment was to clarify the brown bear bait season and hunting season both end June 30. The Copper Basin Fish and Game Advisory Committee (AC) submitted the proposal to align the Unit 11 brown bear season with the adjacent Unit 12 season. ADF&G commented there were no conservation concerns and harvest was not expected to increase greatly (ADF&G 2018).

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.

Biological Background

The State management objective for brown bears in Unit 11 is to provide the greatest sustained opportunity to participate in hunting brown bears (Hatcher 2023).

Brown bears are considered abundant in Unit 11. Frequent sightings of females with cubs suggest good productivity. Frequent observations of bears by ADF&G staff and the public suggest a healthy, abundant and well-distributed population. Based on incidental observations and harvest locations, brown bears inhabit most of Unit 11 except high-elevation glaciers. Overall, Unit 11 is considered good brown bear habitat because of the variety of vegetation types, large tracts of undeveloped land, and the presence of ungulates and numerous salmon streams throughout the unit (Stantorf 2015).

After den emergence, most bears, except females with cubs of the year, move into riparian areas to feed on newly emergent vegetation and over-wintered berries. They also scavenge carcasses of ungulates that died during winter, and prey on neonatal moose and caribou calves. Throughout the summer, brown bears in Unit 11 feed in various habitats. In late summer, bears generally move into subalpine habitats to feed on ripening blueberries. Bears feed on salmon in the numerous streams located throughout Unit 11 (Stantorf 2015).

In May 2019, NPS conducted an aerial survey for brown bears that covered much of Unit 11. Preliminary results suggest that brown bear densities within Unit 11 are consistent with recent density estimates in nearby units (Hatcher 2023).

Given the low yearly harvests, access limitations, and the large amount of habitat that serves as refugia due to a stricter eligibility for users per NPS regulations, hunting likely has no influence on brown bear numbers, composition, or productivity trends in the unit (Stantorf 2015).

Harvest History

No permits or harvest tickets are required to hunt brown bears in Unit 11 under State or Federal regulations, although all harvested bears are required to be sealed within 30 days of kill, providing harvest information. Bait may be used to hunt brown bears under State regulations from Apr. 15–June 30 and under Federal regulations from Apr. 15–June 15.

Brown bear harvest in Unit 11 averaged 16 bears annually through the 1960s and 1970s but declined substantially after 1980 when Wrangell-St. Elias National Park and Preserve (WRST) was established, closing much of the unit to brown bear harvest. Harvest averaged only 6 bears annually through the 1980s and 1990s. Harvest increased after 1999, when a Federal brown bear season was established for Unit 11, opening the park to subsistence brown bear hunting, averaging 16 bears annually in the 2000s and 17 bears annually from 2010 through 2013 (Hatcher 2023).

From 2014-2018, reported brown bear harvest averaged 10 bears annually, which is the lowest 5-year average in 15 years (**Table 1**). Non-local residents and non-residents have historically harvested most of the brown bears in Units 11, averaging 75% of the reported bears harvested from 2014–2018 (Hatcher 2023). Local residents, defined as hunters living in Units 11 or 13, only harvested 1–5 bears annually over the same time frame, averaging 2.6 bears per year or 25% of the total reported harvest (**Table 1**; Hatcher 2023).

Other units (i.e. Unit 17) include management objectives to sustain an annual harvest composed of at least 50% males (Peterson 2023). While not a management objective for Unit 11, this metric is also monitored in Unit 11. From 2014 to 2018, the percent females in the reported harvest averaged 34%, ranging from 14% to 57%, which has been typical for Unit 11 since 1999 (**Table 1**; Hatcher 2023).

Given the unique land status and relatively difficult access in Unit 11, brown bear harvest pressure does not currently pose a concern for the sustainability of the population. Brown bear mortality occurring in defense of life or property (DLP) in Unit 11 typically ranges from 0 to 1 bear in a 5-year reporting period. Unreported human-caused mortality of brown bears in Unit 11 is likely minimal, given the relatively low level of hunting pressure (Hatcher 2023).

Table 1. Unit 11 Brown bear harvest by residency and percent females in the harvest. Local users are defined as hunters who live in Units 11 or 13 (Hatcher 2023; Rinaldi 2025 pers. comm).

Year	Local Resident	Nonlocal Resident	Nonresident	Total Harvest	%Female
2014	2	2	3	7	57
2015	5	3	8	16	31
2016	1	1	5	7	14
2017	3	2	6	11	45
2018	2	2	5	9	22
2019	1	5	4	12	50
2020	2	5	3	10	30
2021	4	6	8	18	44
2022	1	4	8	13	0.07
2023	6	3	5	14	35
2024	0	1	5	6	16
Average	2.45	3.09	5.45	11.18	31.28

Alternative(s) Considered

One alternative considered was to extend the Unit 11 brown bear season to close on June 30th to align with State regulations. Currently, the Federal brown bear season in Unit 11 is shorter than the State season. However, federally qualified subsistence users may already harvest brown bear until June 30th on some Federal lands under State regulations. WRST National Park, where State regulations do not apply, comprises 63% of Unit 11. This alternative was not further considered as it is outside the scope of the proposal.

Discussion and Effects

If Proposal WP26-24 is adopted, the brown bear harvest limit in Unit 11 will increase from one to two bears, increasing subsistence opportunity. This proposal would also increase regulatory complexity by misaligning State and Federal harvest limits for brown bear in Unit 11.

No impacts to the Unit 11 brown bear are expected from this proposal. Unit 11 is vast, remote, and experiences very low harvest pressure. While no formal population assessments have occurred, brown bear populations in Unit 11 are considered abundant, healthy, and well-distributed across the unit. 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 and promote recruitment. Additionally, most of the brown bear harvest is by non-federally qualified users. Federally qualified subsistence users have historically only harvested a few brown bears from Unit 11 and must salvage both the meat and the hide; harvest is not expected to increase substantially from increasing the harvest limit to two bears. Indeed, ADF&G has not observed substantial increases in brown bear harvest in other units where the harvest limit was increased to two bears, including Units 12 and 16A, which are on the road system,

close to large population centers, and experience much higher harvest pressure than Unit 11 (ADF&G 2025).

OSM CONCLUSION

Support Proposal WP26-24

Justification

This proposal increases subsistence opportunity. There are no conservation concerns due to very low harvest pressure and brown bear populations that are considered abundant and healthy in Unit 11.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

Southcentral Alaska Subsistence Regional Advisory Council

Support. This proposal is in an area with challenging hunter access that will limit harvest, and any additional harvest could help local moose and caribou populations. Additionally, there is local Tribal support for the proposal from the Ahtna Intertribal Resource Commission, and this would provide additional opportunity for federally qualified subsistence users. The Council noted that while there is no conservation concern regarding brown bear populations in this unit, they support additional monitoring of the population to ensure sustainable harvests.

Eastern Interior Alaska Subsistence Regional Advisory Council

The Council voted to **take no action** and defer to the Southcentral Council, and to submit a comment to the Board. The council submitted this proposal with the intent to increase subsistence opportunity but ultimately decided to not take action on it since it is outside of their region. Although, the council deferred to the home region, they would like to note that this proposal would misalign State and Federal regulations. Additionally, the Council agrees with comments submitted by Ahtna Intertribal Resource commission (AITRIC) and the Wrangell-St. Elias National Park Subsistence Resource Commission that if this proposal is adopted, there needs to be improved monitoring of brown bear populations in Unit 11 in coordination with AITRC and other local stakeholders. Brown bear population information is severely lacking, and the Council expressed concerns about increasing the harvest limit without a way to assess the impacts to the population. The also noted the Federal Subsistence Board cannot guarantee monitoring would occur if this proposal is adopted.

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 WP26-24

This proposal seeks to increase the brown bear harvest limit to 2 bears in Game Management Unit 11.

Position

The Alaska Department of Fish & Game (ADF&G) **OPPOSES** this proposal as it sees its passage as an unnecessary deviation from state regulations and therefore 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.

WRITTEN PUBLIC COMMENTS

Ahtna Intertribal Resource Commission