

WP26–25/26 Executive Summary	
General Description	Wildlife Proposals WP26-25/26 request to increase the harvest limit for brown bears in Unit 13 to 2 bears. <i>Submitted by: Eastern Interior Alaska Subsistence Regional Advisory Council (WP26-25) and Southcentral Council (WP26-26)</i>
Proposed Regulation	<i>Unit 13—2+ bears. Aug. 10—May 31</i> <i>Bears take within Denali National Park must be sealed within 5 days of harvest. That portion within Denali National Park will be closed by announcement of the Superintendent after 4 bears have been harvested.</i>
OSM Conclusion	Support
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	Support
Eastern Interior Alaska Subsistence Regional Advisory Council Comment	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	Support
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 WP26-25/26

ISSUE

Wildlife Proposal WP26-25, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) and Wildlife Proposal WP26-26, submitted by the Southcentral Council, request to increase the harvest limit for brown bears in Unit 13 from one to two bears.

Proponent statement

WP26-25

The proponent states this proposal would provide additional opportunity for federally qualified subsistence users. There are no conservation concerns for brown bear in Unit 13 and not much Federal land. The brown bear harvest limit in Unit 13 was recently changed to two bears under State regulations.

WP26-26

The proponent states that the Alaska Board of Game (BOG) recently adopted Proposal 57 to increase the brown bear harvest limit in Unit 13 under State regulations. This proposal would keep Federal and State regulations aligned, provide additional subsistence harvest opportunity, and prevent Federal regulations from being more restrictive than State regulations.

Current Federal Regulations

Unit 13—Brown bear

Unit 13—1 bear.

Aug. 10—May 31

Bears take within Denali National Park must be sealed within 5 days of harvest. That portion within Denali National Park will be closed by announcement of the Superintendent after 4 bears have been harvested.

Proposed Federal Regulations

Unit 13—Brown bear

Unit 13—2 ± bears.

Aug. 10—May 31

Bears take within Denali National Park must be sealed within 5 days of harvest. That portion within Denali National Park will be closed by announcement of the Superintendent after 4 bears have been harvested.

Current State Regulations

Unit 13—Brown bear

<i>Unit 13E, within Denali State Park</i>	<i>Residents and Nonresidents: 2 bears every regulatory year</i>	<i>Aug. 10—June 15</i>
<i>Unit 13, remainder</i>	<i>Residents and Nonresidents: 2 bears every regulatory year</i>	<i>No closed season</i>

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;*

§100.26(j) Sealing of bear skins and skulls.

- (1) *Sealing requirements for brown bear taken apply in all Units, except as specified in this paragraph (j). Sealing requirements for black bears of all color phases taken apply in Units 1-7, 13-17, and 20.*
- (2) *You may not possess or transport from Alaska the untanned skin or skull of a bear unless the skin and skull have been sealed by an authorized representative of ADF&G in accordance with State or Federal regulations, except that the skin and skull of a brown bear taken under a registration permit in Units 5, 9B, 9E, 17, 18, 19A, and 19B downstream of and including the Aniak River drainage, and Units 21D, 22, 23, 24, and 26A need not be sealed unless removed from the area.*
- (3) *You must keep a bear skin and skull together until a representative of the ADF&G has removed a rudimentary premolar tooth from the skull and sealed both the skull and the skin; however, this provision does not apply to brown bears taken within Units 5, 9B, 9E, 17, 18, 19A, and 19B downstream of and including the Aniak River drainage, and Units 21D, 22, 23, 24, and 26A and which are not removed from the Unit.*

(ii) *If the skin or skull of a bear taken in Units 9B, 17, 18, and 19A and 19B downstream of and including the Aniak River drainage is removed from the area, you must first have it*

sealed by an ADF&G representative in Bethel, Dillingham, or McGrath; at the time of sealing, the ADF&G representative must remove and retain the skin of the skull and front claws of the bear.

Extent of Federal Public Lands

Unit 13 is comprised of approximately 15% Federal public lands that consist of 6% Bureau of Land Management (BLM), 6% National Park Service (NPS), and 2% U.S. Forest Service (USFS) managed lands.

Customary and Traditional Use Determination

Rural residents of Unit 13 and Slana have a customary and traditional use determination for brown bear in Unit 13.

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.

The communities of Cantwell, Lake Minchumina, Nikolai and Telida are recognized as subsistence resident zones for Denali National Park. However, 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. Of the four resident zone communities, only Cantwell has a customary and traditional use determination for brown bears in Unit 13. This means that it is the only community that can hunt for brown bears in the portion of Denali National Park within Unit 13.

Regulatory History

Prior to 1999, there was no Federal hunt for brown bear in Unit 13.

In 1999, the Federal Subsistence Board (Board) adopted Proposal P99-021 as modified by the Southcentral Council to establish a brown bear hunt in Unit 13. The proposal requested a season of Sept. 1-May 31 with a one bear harvest limit. The modification was to extend the season to Aug. 1-May 31 to align with the existing State season, and to add the provision that bears taken in Denali National Park must be sealed within five days of harvest and the Park portion of the hunt would be closed after four bears were harvested. The Interagency Staff Committee and OSM staff analysis commented that bear populations in Denali National Park were lower, and while harvest was expected to be small due to access and low harvest pressure, the lower estimated bear population and lack of definitive data warranted the four bear quota. Federal regulations for brown bear in Unit 13 have not changed since.

In 2003, with the exception of Denali State Park, the Unit 13 brown bear hunting season was extended to year-round under State regulations (Hatcher 2023).

In 2013, brown bear harvest at bear-bait stations in Unit 13D was allowed under State regulations, and in 2015, brown bear harvest at bear-bait stations in the remainder of Unit 13 was allowed under State regulations (Hatcher 2023).

In 2025, the BOG adopted Proposal 57 to increase the brown bear harvest limit in Unit 13 to two bears under State regulations. Increasing the harvest limit to two bears also allows the sale of hides (with claws attached) and skulls after sealing. There are no conservation concerns for brown bears in Unit 13, and this is not expected to cause conservation concerns (ADF&G 2025c).

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

State management objectives for brown bears in Unit 13 include: 1) Reduce brown bear densities, and 2) Maintain a unit wide population of 350 independent brown bears (Hatcher 2023).

To address the BOG directive of reducing the brown bear population in Unit 13, a baseline study was conducted in western Unit 13A in 1998 that determined a brown bear density estimate of 21.3 independent bears per 1,000 km² (27.5 all bears/1,000 km²), which represents 1,260 independent bears in Unit 13 (Hatcher 2023). Based on an aerial capture-mark-resight survey done on bears in 2011 in Unit 13A, there was a 25–40% reduction in brown bear densities compared to the baseline study, with 13.0 independent bears per 1,000 km² estimated in 2011 (ADF&G 2025a).

This study was repeated in 2022, although there was slight modification to the study area to improve sampling. This change makes comparability with 2011 difficult, but preliminary analyses suggest that the brown bear population in the Unit 13A study area has stabilized at a level lower than 1998 and shows some increase in the total number of bears since 2011. The density of independent bears (which are subject to hunting) have generally remained the same (2011: 13/1,000 km² vs 2022: 14.8/1,000 km²) (ADF&G 2025a).

While the density estimate for the Unit 13A study area may not be applicable to all other parts of Unit 13, these estimates serve as an index for the brown bear population over time. The generally lower population density for brown bears compared to the 1998 baseline is believed to be applicable to the Unit 13 population as a whole and the population is no longer in decline (ADF&G 2025a).

The protection of females and dependent offspring within the study population appears to be a sufficient safeguard to avoid a sharp decline in population numbers given current harvest rates, and evidence suggests that as brown bear populations decline in Unit 13, they may also become more productive, presenting another safeguard against overharvest (Hatcher 2023, ADF&G 2025a).

Harvest History

No permits or harvest tickets are required to hunt brown bears in Unit 13 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, but not under Federal regulations.

Brown bear harvest in Unit 13 has increased substantially since the early 1960s when the average annual take was only 39 bears. Average annual harvest steadily increased through the mid-1990s as regulations gradually liberalized. In 1995, the Board of Game (BOG) established an objective to reduce the population of brown bears in Unit 13 by liberalizing harvest with the goal of improving survival of moose calves. Brown bear harvest stabilized from the mid-1990s through the mid-2010s. Harvest more recently has increased, which is likely associated with the allowance of brown bear harvest at bear-bait stations in Unit 13D beginning in 2013, and in the remainder of Unit 13 beginning in 2015 (Hatcher 2023).

From 2010 to 2023, brown bear harvest in Unit 13 ranged from 103 bears in 2014 to 153 bears in 2015 (when baiting was allowed unit wide), averaging 138 bears per year (**Table 1**). The most recent five-year average harvest (2018–2022) of 139 bears/year is similar to the previous five-year average of 142 bears/year (2013–2017), which was an increase over the previous five-year average of 135 bears (2008–2012) (ADF&G 2025a).

Harvest numbers are highest in Unit 13E and lowest in Unit 13C (**Table 1**). Differences in harvest levels between subunits can be attributed to multiple factors, including access, habitat, and overall subunit size. Current brown bear harvest pressure is highest in areas with road access to public lands, especially those areas that are within closer driving distance to large population centers such as Anchorage and the Mat-Su Valley (ADF&G 2025a).

The percent of females in the Unit 13 harvest has increased in recent years, both in overall harvest and in harvest of bears over bait (ADF&G 2025a). From 2010-2022, the percent of females in the total harvest ranged from 37%-54%, with the highest percent occurring in 2022. Other units (i.e. Unit 17) include management objectives to sustain an annual harvest composed of at least 50% males (Peterson 2023). The percent of females in the Unit 13 harvest has approached 50% for several years; however, 2022 is the only year when it exceeded 50%. While not an explicit objective for Unit 13, ADF&G

notes they will closely monitor the percent of female bears harvested, although it is not currently a conservation concern (ADF&G 2025a).

Table 1. Brown bear harvest in Unit 13 from 2010-2023. Figure from ADF&G presentation on Proposal 57 to the BOG at their January 2025 meeting (ADF&G 2025b).

Regulatory Year	GMU 13A	GMU 13B	GMU 13C	GMU 13D	GMU 13E	GMU 13 Total
2010	34	18	3	27	56	138
2011	19	18	5	21	57	120
2012	24	20	12	25	48	129
2013	28	22	8	54	47	159
2014	10	14	10	24	45	103
2015	20	25	16	37	55	153
2016	33	27	11	32	44	147
2017	26	31	7	30	54	148
2018	23	33	10	25	59	150
2019	28	28	12	27	39	134
2020	20	20	14	20	64	138
2021	23	26	16	30	37	132
2022	29	36	10	17	47	139
2023*	22	18	13	23	44	120
Average	24	24	10	28	50	138

*2023 data are preliminary

Alternative(s) Considered

One alternative considered was to extend the Unit 13 brown bear season to year-round to align with State regulations. Currently, the Federal brown bear season in Unit 13 is shorter than the State season. However, federally qualified subsistence users may already harvest brown bear year-round on most Federal lands (except Denali National Park) under State regulations. This alternative was not further considered as it is outside the scope of the proposal.

Another alternative considered was to except Denali National Park from the harvest limit increase. Current Federal regulations restrict brown bear harvest within the Park to four bears. Increasing the harvest limit to two bears within the Park means the season could close after two federally qualified subsistence users harvest two bears each, potentially decreasing opportunity for other federally qualified subsistence users. Conversely, if only a few federally qualified subsistence users typically hunt brown bears within the Park, this proposal could increase subsistence opportunity for those few users. However, current brown bear harvest from Denali National Park within Unit 13 is unknown.

Discussion and Effects

If these proposals are adopted, the brown bear harvest limit in Unit 13 would increase from one bear to two bears, increasing subsistence opportunity under Federal regulations. No impact on the brown bear population is expected as users may already harvest two brown bears on most Federal public lands in Unit 13 under State regulations. 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, safeguarding against current harvest pressure (ADF&G 2025b, Hatcher 2023).

Additionally, 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 also on the road system, adjacent to Unit 13, and close to large population centers. The harvest limit in Unit 12 increased to two bears in RY2024 and no hunter reported harvesting two bears in the fall of 2024. The harvest limit in Unit 16A increased to two bears in RY2018, and since then, only 10 hunters have sealed more than one bear in a year (ADF&G 2025b).

Adopting these proposals would also decrease regulatory complexity and confusion by aligning State and Federal harvest limits for brown bear in Unit 13 as directed by Executive Order 14153 3(b)(xxii) to “ensure to the greatest extent possible that hunting and fishing opportunities on Federal lands are consistent with similar opportunities on State lands.”

OSM CONCLUSION

Support Proposals WP26-25/26.

Justification

These proposals increase subsistence opportunity and there are no conservation concerns. Additionally, they reduce regulatory complexity by aligning State and Federal harvest limits for brown bear in Unit 13.

LITERATURE CITED

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

Southcentral Alaska Subsistence Regional Advisory Council

Support. This proposal increases subsistence opportunity; there is no conservation concern, and this regulatory change will align the State and Federal harvest limits in this unit, although additional monitoring is vital.

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

No comment submitted.

WRITTEN PUBLIC COMMENTS

Ahtna Intertribal Resource Commission