

WP26–33 EXECUTIVE SUMMARY	
General Description	Wildlife Proposal WP26-33 requests up to 4 brown bear permits be allocated to the community of Kodiak. <i>Submitted by: Kodiak/Aleutians Subsistence Regional Advisory.</i>
Proposed Regulation	<p>Unit 8—Brown bear</p> <p><i>Unit 8—1 bear by Federal registration permit (FB0802) only, issued by the Kodiak National Wildlife Refuge Manager and per community as follows:</i></p> <p style="text-align: right;"><i>Dec. 1—Dec. 15</i> <i>Apr. 1—May 15</i></p> <p><i><u>Akhiok</u>—up to 2 permits;</i> <i><u>Karluk</u>—up to 1 permit;</i> <i><u>Kodiak Community</u>—Up to 4 permits;</i> <i><u>Larsen Bay</u>—Up to 3 permits;</i> <i><u>Old Harbor</u>—Up to 3 permits;</i> <i><u>Ouzinkie</u>—Up to 2 permits; and,</i> <i><u>Port Lions</u>—Up to 2 permits.</i></p>
OSM Preliminary Conclusion	Support
OSM Conclusion	Support with modification to change the permit area descriptor to: ‘All other Unit 8 residents’
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	Support
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

Wildlife Analysis WP26-33

ISSUE

Wildlife Proposal WP26-33, submitted by the Kodiak/Aleutians Subsistence Regional Advisory Council (Council) requests up to 4 brown bear permits be allocated to the community of Kodiak.

Proponent Statement

The proponent states that the communities around Kodiak Island have a long history of the customary and traditional harvesting of brown bear for food and traditional handicraft. In the published journal, *Two Voyages to Russian America, 1802-1807*, G.I. Davydov writes, 'on Kad'iak sometimes two or three people in a group creep up on an animal and fire arrows at it, and if it attacks them, they fight it off with spears.' Davydov also notes that while Kamleikas (rain parkas) are made from the intestines of whales, seals and bears and of the gut kamleikas, the best ones are from the bears (Davydov. Published 1977 from journals). The Alutiiq Museum as well as local author and Kodiak brown bear expert, Larry Van Dael, also have produced publications about the importance of traditional bear harvesting on Kodiak Island. In addition, many museums across the world hold collections of art that both depict bears and articles of clothing that, today, are recognized as native handicraft.

The importance of accessing bears for food and other needs is well documented in Kodiak. The residents of the villages around the island have access to harvest 1, 2, or 3 bears, and the village populations range from about 30-100 residents. The community of Kodiak has about 9,000 residents and the proponent feels that *up to 4 permits* is a reasonable number of permits to request. The community of Kodiak has the same history of customary and traditional use as the villages currently receiving permits for the harvesting of brown bear.

The proponents do not feel this will place a burden on the brown bear population. About 200 bears are killed by hunters each year on Kodiak Island by residents and non-residents, including by international hunters. The brown bear populations and their habitats are healthy, and the proponent does not foresee this causing any issues with the conservation or management of the bears.

Note: Proposal WP26-32, also submitted by the Kodiak/Aleutians Council, requests recognition of the customary and traditional uses of brown bear in Unit 8 by residents of the Kodiak Road System, which they define as including residents on the Kodiak Road system (Monashka, City of Kodiak, Bells Flats to Chiniak and Pasagshak and Anton Larsen Bay). Not included: Nemetz and Coast Guard Base residents and rocket launch facility residents.

Current Federal Regulations

Unit 8—Brown bear

Unit 8—1 bear by Federal registration permit (FB0802) only, issued by the Kodiak National Wildlife Refuge Manager and per community as follows: *Dec. 1—Dec. 15*
Apr. 1—May 15

- Akhiok—up to 2 permits;*
- Karluk—up to 1 permit;*
- Larsen Bay—Up to 3 permits;*
- Old Harbor—Up to 3 permits;*
- Ouzinkie—Up to 2 permits; and,*
- Port Lions—Up to 2 permits.*

Proposed Federal Regulations

Unit 8—Brown bear

Unit 8—1 bear by Federal registration permit (FB0802) only, issued by the Kodiak National Wildlife Refuge Manager and per community as follows: *Dec. 1—Dec. 15*
Apr. 1—May 15

- Akhiok—up to 2 permits;*
- Karluk—up to 1 permit;*
- Kodiak Community—Up to 4 permits;***
- Larsen Bay—Up to 3 permits;*
- Old Harbor—Up to 3 permits;*
- Ouzinkie—Up to 2 permits; and,*
- Port Lions—Up to 2 permits.*

Current State Regulations

Unit 8—Brown bear

<i>Unit 8, Northeastern portion of Kodiak Island, including all drainages into Chiniak, Anton</i>	<i>Residents and Nonresidents—1 bear every four regulatory years by permit available in person in Kodiak beginning Oct. 2</i>	<i>RB230</i>	<i>Oct. 25-Nov. 30</i>
---	---	--------------	------------------------

<i>Larsen and northeast Ugak (east of the Saltery Creek drainage) bays, including Spruce, Near, Long, Woody, and Ugak Islands</i>	<i>OR</i> <i>1 bear every four regulatory years by permit available in person in Kodiak beginning Mar. 5</i>	<i>RB260</i>	<i>Apr. 1-May 15</i>
<i>Unit 8 remainder</i>	<i>Residents and Nonresidents—1 bear every four regulatory years by permit</i>	<i>DB101-128</i> <i>DB161-163</i> <i>DB201-228</i> <i>DB261-263</i>	<i>Oct. 25-Nov.30</i>
	<i>OR</i> <i>1 bear every four regulatory years by permit</i>	<i>DB131-158</i> <i>DB191-193</i> <i>DB231-258</i> <i>DB291-293</i>	<i>Apr. 1-May 15</i>

Extent of Federal Public Lands

Unit 8 is comprised of approximately 52% Federal public lands that consist of 52% U.S. Fish and Wildlife Service (USFWS) and <1% Bureau of Land Management (BLM) managed lands.

Customary and Traditional Use Determination

Rural residents of Akhiok, Larsen Bay, Karluk, Old Harbor, Ouzinkie, and Port Lions have a customary and traditional use determination for brown bear in Unit 8.

Regulatory History

Please see the Regulatory History in the analysis for Proposal WP26-32.

Current Events

Wildlife Proposal WP26-32 requests to recognize the customary and traditional use of brown bear by residents of the Kodiak Road Zone. This proposal would need to be adopted by the Board for Proposal WP26-33 to be considered.

Biological Background

In 2002, the Kodiak Archipelago Bear Conservation and Management Plan (ADF&G 2002) was developed by a Citizens Advisory Committee which consisted of representatives from 12 diverse groups, including the Alaska Department of Fish and Game (ADF&G) and Kodiak National Wildlife Refuge (Kodiak NWR). The three main themes from the 270 recommendations on Kodiak bear

management and conservation were: (1) continued conservation of the bear population at their current levels; (2) increased outreach and education to teach people how to live with bears in Kodiak; and (3) protection of bear habitat with allowances for continued human use of the Kodiak Archipelago (Van Daele and Crye 2011).

State management objectives for brown bear management in Unit 8 are (Svoboda and Crye 2023):

- Maintain a stable brown bear population that will sustain an annual harvest of 150 bears composed of at least 60% males.
- Maintain diversity in the gender and age composition of the brown bear population, with adult bears of all ages represented in the population and in the harvest.
- Limit human-caused mortality of female brown bears to a level consistent with maintaining maximum productivity.

ADF&G, with the assistance of Kodiak NWR staff and the Alaska State Troopers conducted intensive aerial surveys in 9 study areas on Kodiak Island from 1987 to 2010 using methods developed by Barnes and Smith (1997). Seven of these areas were sampled more than once. The data was extrapolated to estimate the total brown bear population in 1995 and 2005 (Van Daele and Crye 2011). Population estimates from the survey in 1995 were 2,980 brown bears in Unit 8. By 2005, brown bear population estimates were 3,526 brown bears in Unit 8 (Van Daele and Crye 2011).

Unit 8 is now divided into six management subunits containing eight survey areas (**Figure 1** and **Table 1**). Each management subunit has its own density objective range. Intensive aerial surveys (IAS) are conducted on a rotating basis within the eight survey areas to inform whether management objectives are being met. These surveys indicate stable brown bear populations across seven survey areas. The latest surveys were conducted between 2021 and 2024 covering six of the eight aerial survey areas (Svoboda pers. comm. 2025). The Shearwater and Southwest IAS areas dipped just below management objective during the last surveys in 2021 and 2022, respectively; however, as these declines were minimal and just for one survey year, they are not of concern at this time. The Sturgeon IAS area density estimates were well below management objectives during the last two surveys in 2018 and 2019 (Svoboda pers. comm. 2025). The density estimate for this survey area was only “57% of the lower end of the density objective range” (180-260 independent bears/1,000 km²) for the Southwest management subunit, which presents a potential conservation concern (Svoboda and Crye 2023).

In addition, aerial brown bear surveys were conducted yearly from 2000-2012 along selected streams in the southern portion of Kodiak Island to monitor trends in cub production (Van Daele and Crye 2011). To determine appropriate harvest strategies and guidelines, the harvest and population data are analyzed using a population model (Van Daele and Crye 2011). Inter-annual variation in the composition of brown bears from these aerial surveys, which is considerable, may be due in part to the timing of the surveys with respect to peak periods of berry and salmon abundance. The percentage of adult females in the areas surveyed from 1985-2009 ranged from a high of 19.6% (1995-1999) to a low of 11.3% (2005, 2008-2009). Adult females are the most important segment of the population with respect to population growth (Miller 1990, Van Daele 2007).

Female Kodiak brown bears do not successfully reproduce until they are four years old and six years old for males (USFWS 2025). The delay in reproduction, as well as small litter sizes, long intervals between successful reproductive events, and short potential reproductive periods lead to the low rates of successful production in brown bears in northern Alaska (USFWS 1982). In addition, female brown bears exhibit high fidelity to home ranges and little emigration or immigration (Reynolds 1993). Therefore, brown bears are often managed conservatively.

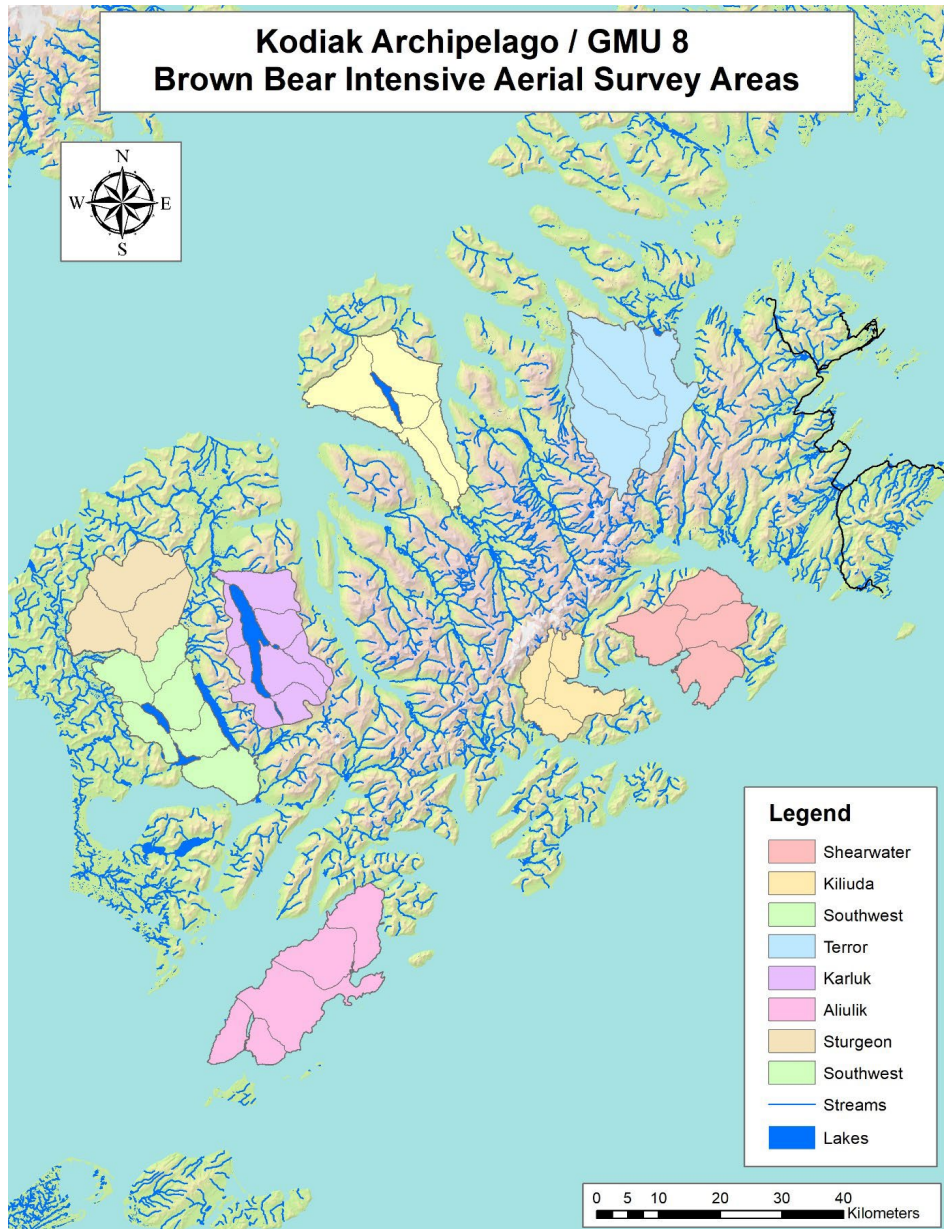


Figure 1. Eight aerial survey areas (Aliulik Peninsula, Karluk Lake, Kiliuda, Southwest, Shearwater, Spiridon, Sturgeon River, and Terror Lake) used for the brown bear intensive aerial surveys in Unit 8 (Svoboda and Crye 2023). Legend in image is missing name for Spiridon but has Southwest listed twice.

Table 1. Density objective ranges for brown bears by management subunit in Unit 8 (Svoboda and Crye 2023 and Van Daele 2009).

Geographic Unit	Independent bears/1,000km ²	Total bears/1,000km ²	Total Bears
Afognak and Northern Islands	100-170	141-236	328-549
Northwestern Kodiak	170-280	228-380	681-1,134
Northeastern Kodiak (Road System)	50-90	76-125	78-129
Southeastern Kodiak	180-280	342-514	573-860
Southwestern Kodiak	180-260	250-375	920-1,381
Aliulik Peninsula	160-260	223-372	144-239
Unit 8 Total	840-1,340	1,206-2,002	2,724-4,292

Cultural Knowledge and Traditional Practices

Please also see the analysis for Proposal WP26-32 for additional cultural information.

Available data indicate that residents of the Kodiak Road Zone rely primarily on areas in the northeastern portion of the island for brown bear hunting, possibly because it is much easier to get a permit to hunt in these areas. Subsistence research documents that in 1982, residents of the Kodiak Road Zone only reported hunting brown bear in the road-accessible portions of the island (KANA and ADF&G 1983). Harvest data from 1965-1996 document that 66% of brown bears harvested by Kodiak Road Zone residents were taken on non-Federal lands, which are primarily those around Kodiak City and on Afognak Island (OSM 1996).

Household surveys conducted by the ADF&G Division of Subsistence provide additional insight on the use of brown bears by Kodiak Island residents. Data spanning from 1982 to 2021 shows consistent but low harvest of brown bears by residents of Kodiak City, Kodiak Station, Mill Bay, Womens Bay, and Chiniak communities (**Table 5** in WP26-32). Sharing of bear meat was infrequently documented in these household surveys (**Table 5** in WP26-32).

Because bear hunting tends to be a specialized activity conducted by a small number of households (and limited by permit availability), it is possible that bear hunting activity may be missed by subsistence surveys (OSM 2024).

Harvest History

Brown bear hunting in Unit 8 has been conducted by State registration (RB230 and RB260) and drawing permits since at least 1989. A Federal season was first established in 1997 (FB0802). **Table 2** shows all brown bear kills in Unit 8 between regulatory years 2000/01 and 2023/24. Brown bear harvests in Unit 8 increased in the early 2000s as the bear population grew, but harvest levels have stabilized since the early 2010s (Svoboda and Crye 2023). The low harvest in 2019/20 is due to the COVID-19 pandemic. Between 1996 and 2023, the percent of males harvested annually has been

greater than 68%, which exceeds the State management goal of at least 60% (Svoboda and Crye 2023; Svoboda 2025, pers. comm.).

Between regulatory years 2000/01 and 2024/25, FQSUs harvested an average of 1.6 brown bears per year under Federal registration permit FB0802 in Unit 8 (OSM 2023; **Table 3**). The community with the greatest number of Federal permit harvests over this period was Old Harbor, followed by Larsen Bay. Between 2000 and 2023, FQSUs using the FB0802 Federal registration permit accounted for about 0.7% of all brown bears taken in Unit 8 (Svoboda and Crye 2015, Svoboda 2023, pers. comm., OSM 2023).

Residents of Kodiak can currently harvest brown bear under State registration permit RB230, around the road system or enter to be drawn for one of the up to 232 State brown bear draw permits for the remainder of Unit 8. All the State permits only allow a person to harvest one brown bear every four regulatory years. Kodiak residents currently harvest an average of 14.8 bears per year (**Table 2**).

Brown bear sealing data from 1983-1994 indicate that residents of the Kodiak Road Zone consistently harvest brown bears and that they comprise the majority of brown bear hunters from Unit 8 (**Figure 2** in WP26-32). However, during these years, residents of the Kodiak Road Zone harvested an average of about 11 bears per year, representing only 6.4% of the total sport harvest (Fall et al. 1992, ADF&G 1995). Data on harvest by Kodiak Road Zone residents is not available for other years, but harvest data from 1983-2013 indicate that all Unit 8 residents harvested an average of just over 15 brown bears per year, accounting for roughly 4% – 16% (average: 8.5%) of all brown bears harvested under State sport hunting regulations (**Figure 3** in WP26-32).

Table 2. State and Federal Unit 8 brown bear harvest, regulatory years 2000/01 to 2023/24 (Svoboda pers. comm 2025; OSM 2025; OSM 2024). Federal harvest is all harvest under the FB0802 permit. State harvest happens under several draw and registration permits hunts. In 2003/04 there were six bears harvested by people of unknown residency, that are in the total. NFQU = non-federally qualified user. DLP = defense of life and property. Unit 8 Remote Communities = harvested brown bears under State regulations.

Regulatory Year	Federal Harvest (FB0802)	Unit 8 Residents: Kodiak (NFQU)	Unit 8 Residents: Remote Communities	Other NFQUs	DLP & Agency Removal	Total Harvest
2000/01	3	9	1	120		133
2001/02	2	19	3	138		162
2002/03	0	4		134	3	141
2003/04	1	22		137	2	168
2004/05	3	14	3	152	11	183
2005/06	2	21	2	185	7	217
2006/07	2	18		184	22	226
2007/08	0	11	1	172	12	196
2008/09	0	30	4	218	15	267
2009/10	1	16	2	183	13	215
2010/11	1	25		198	13	237
2011/12	2	23	1	176	5	207
2012/13	0	34	1	152	9	196
2013/14	0	5		159	6	170
2014/15	0	12	1	171	6	190
2015/16	1	10	1	178	8	198
2016/17	2	11		181	19	213
2017/18	1	11		179	17	208
2018/19	1	10	1	186	12	210
2019/20	0	9		79	11	99
2020/21	3	9	4	196	12	224
2021/22	4	5		209	6	224
2022/23	4	11	2	162	13	192
2023/24	4	18	1	172	3	198
Average	1.6	14.9	1.9	167.5	10.2	194.8
Total	37	455	38	5470	225	6233

Table 3. The number of brown bears reported harvested under Federal subsistence permit FB0802 between regulatory years 1997/98 and 2024/25, by harvesters' resident community (OSM 2024). There are zeros in cells where a permit was issued within a community, but no successful harvest was reported. In years for which no permits were issued within a particular community, the corresponding cell has been left blank. There is no information as to why there have been permits issued to residents of Kodiak.

Regulatory Year	Akhiok	Karluk	Kodiak	Larsen Bay	Old Harbor	Port Lions	Total Harvest
2000				1	2		3
2001				1	1		2
2002							0
2003					1		1
2004	1			2	0		3
2005				2	0		2
2006				1	1		2
2007							0
2008							0
2009	0			0	1		1
2010	1		0	0	0		1
2011				0	2		2
2012							0
2013							0
2014							0
2015				1	0		1
2016			1	0	1		2
2017				0	1		1
2018				1			1
2019				0	0		0
2020			1		2		3
2021							0
2022	1				3		4
2023	1				3		4
2024	1				3		4
Average	0.6		0.7	0.5	1.0		1.6
Total	5	0	2	9	21	0	37

Alternative(s) Considered

One alternative considered was to delegate authority to the Kodiak NWR Manager to define harvest areas. While Unit 8 does not have a conservation concern for brown bears overall, there are areas within the unit that do. Allowing for harvest areas to be defined provides the in-season manager the flexibility to address these concerns by excluding the areas of high conservation concern.

Discussion and Effects

If this proposal is adopted, up to 4 Federal brown bear permits in Unit 8 will be issued to residents of the Kodiak Island road system. However, residents along the Kodiak Island road system do not currently have C&T for brown bear in Unit 8. Therefore, this proposal cannot be adopted unless Proposal WP26-32 (recognition of C&T by residents of the Kodiak Road System) is also adopted.

If both Proposals WP26-32 and WP26-33 are adopted, subsistence hunting opportunity for residents along the Kodiak Island road system will increase. The Federal FB0802 permit hunt is very undersubscribed, with only 1.6 bears out of a maximum of 13 bears reported harvested each year on average. Additionally, the total FB0802 harvest only comprises 0.7% of the total Unit 8 brown bear harvest. The Kodiak NWR manager also has authority to adjust the number of permits issued to each community within the regulatory parameters established by the Board.

There are no conservation concerns for the overall Unit 8 brown bear population and impacts from the potential additional harvest is not anticipated to create a conservation concern. At a smaller management area scale, there are conservation concerns for the Sturgeon IAS within the Southwestern Kodiak management subunit. However, as ~200 bears are harvested unit-wide each year on average, the potential for four additional bears to be harvested is not expected to impact the Unit 8 brown bear population. However, users are encouraged to focus their hunting efforts outside of the Sturgeon IAS.

OSM PRELIMINARY CONCLUSION

Support Proposal WP26-33.

Justification

Proposal WP26-33 cannot be adopted unless Proposal WP26-32 is also adopted. Adopting both proposals would increase subsistence hunting opportunity for Kodiak Road Zone residents who have a long history of harvesting and using brown bears for subsistence purposes and there are no conservation concerns.

ANALYSIS ADDENDUM

OSM CONCLUSION

Support WP26-33 **with modification** to change the permit area descriptor to read: “All other Unit 8 residents”.

The draft regulations read:

Unit 8—Brown bear

Unit 8—1 bear by Federal registration permit (FB0802) only, issued by the Kodiak National Wildlife Refuge Manager and per community as follows:

Dec. 1—Dec. 15

Apr. 1—May 15

Akhiok—Up to 2 permits;

Karluk—Up to 1 permit;

Larsen Bay—Up to 3 permits;

Old Harbor—Up to 3 permits;

Ouzinkie—Up to 2 permits; and,

Port Lions—Up to 2 permits.

All other Unit 8 residents— Up to 4 permits

Justification

Wildlife Proposal WP26-33 cannot be adopted unless the corresponding customary and traditional use determination proposal (WP26-32) is also adopted. The OSM modified area descriptor for WP26-33 more closely matches the modified customary and traditional use determination recommended by the Kodiak/Aleutians Council in its deliberations on WP26-32. Adopting similar language for both WP26-32 and WP26-33 should reduce administrative complexity and prevent user confusion, while achieving the Kodiak/Aleutians Council's intent on both proposals. Adopting both proposals will increase subsistence hunting opportunities for Unit 8 residents who have a long history of harvesting and using brown bears for subsistence purposes. An average of roughly 195 brown bears are harvested from Unit 8 each year. However, currently there are only a maximum of 13 Federal subsistence permits available to harvest brown bear in Unit 8 each year. Adding up to four additional Federal brown bear permits for Unit 8 should not present any conservation concerns. Federal subsistence regulations will also continue to require that the hide and edible meat of harvested brown bears be salvaged.

LITERATURE CITED

ADF&G. 1995. Harvest ticket database. Microcomputer database, updated July 1995.

ADF&G. 2002. Kodiak Archipelago Bear Conservation and Management Plan. ADF&G Division of Wildlife Conservation. Anchorage. 222 pages.

Fall, J.A., C. Mishler, and R. Mason. 1992. Customary and traditional use worksheet: Brown Bear—GMU 8: Kodiak Island. Prepared for the Alaska Board of Game, April 1992. ADF&G, Division of Subsistence, Anchorage.

KANA (Kodiak Area Native Association) with assistance from ADF&G (Alaska Department of Fish and Game). 1983. Kodiak Island area local fish and game resource guide. Alaska Department of Fish and Game, Division of Subsistence, Special Publication No. SP1983-002. Anchorage. 110 pages.

- Miller, S.D. 1990. Impacts of increased hunting pressure on the density, structure, and dynamics of brown bear populations in Alaska's Game management Unit 13. ADF&G. Federal Aid in Wildlife Restoration Project. Report Project W-23-2. Studies 4.18 and 4.21. Juneau, AK.
- OSM. 1996. Staff analysis Proposal 26. Pages 362-388 *in* Federal Subsistence Board Meeting Materials. April 29-May 3, 1996. Office of Subsistence Management, USFWS. Anchorage, AK. 784 pp.
- OSM. 2023. Federal Subsistence Harvest Database.
<https://subsistence.fws.gov/apex/f?p=MENU:101:4558339454934:::> Retrieved: May 2023.
- OSM. 2024. Staff analysis WP24-10. Pages 66-85 *in* Federal Subsistence Board Meeting Materials. April 2-, 2024. Office of Subsistence Management, USFWS. Anchorage, AK. 1377 pp.
- OSM. 2025. Federal Subsistence Harvest Database.
<https://subsistence.fws.gov/apex/f?p=MENU:101:16189660352334:::> Retrieved: May 15, 2025.
- Reynolds, H.V. 1993. Evaluation of the effects of harvest on grizzly bear population dynamics in the northcentral Alaska range. ADF&G. Federal Aid in Wildlife Restoration. Research Final Report. Grant W-23-5.
- Svoboda, N. J., and J. R. Crye. 2015. Unit 8 brown bear. Chapter 7, Pages 7-1 through 7-25 in P. Harper and L. A. McCarthy, editors. Brown bear management report of survey and inventory activities 1 July 2012–30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-1, Juneau.
- Svoboda, N. J., and J. R. Crye. 2023. Brown bear management report and plan, Game Management Unit 8: Report period 1 July 2014–30 June 2019, and plan period 1 July 2019–30 June 2024. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-12, Juneau.
- Svoboda, N.J. 2023. Area biologist. Personal communication: email. ADF&G. Anchorage, AK.
- Svoboda, N.J. 2025. Area biologist. Personal communication: email. ADF&G. Anchorage, AK.
- USFWS. 1982. Brown Bear (*Ursus arctos*). Pages 247-248. Initial report baseline study of fish, wildlife and their habitats. Anchorage, AK.
- USFWS. 2025. Kodiak Brown Bear. <https://www.fws.gov/species/kodiak-brown-bear-ursus-arctos-middendorffi>. Retrieved: June 11, 2025.
- Van Daele, L.J. 2007. Unit 8. Pages 75-108 *in* P. Harper, editor. Brown bear management report of survey and inventory activities. 1 July 2008–30 June 2006. ADF&G. Juneau, AK
- Van Daele, L.J. 2009. Unit 8. Pages 83-112 *in* P. Harper, editor. Brown bear management report of survey and inventory activities. 1 July 2006–30 June 2008. ADF&G. Juneau, AK
- Van Daele, L.J. and J.R. Crye. 2011. Unit 8 brown bear. Pages 79-108 *in* P. Harper, editor. Brown bear management report of survey and inventory activities. 1 July 2008–30 June 2010. ADF&G. Juneau, AK.

SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

Kodiak/Aleutians Alaska Subsistence Regional Advisory Council

Support. The Council recognizes the long-standing, traditional subsistence use of bears by residents of the Kodiak Island villages and those living in what is now the Kodiak Road System. Based on the analysis, the Council does not identify conservation concerns, as the anticipated increase in harvest would be minimal.

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 Review WP26-33

This proposal requests up to 4 brown bear permits be allocated to residents living on the Kodiak road system (excluding Nemetz, the U.S. Coast Guard Base, and residents of the Pacific Spaceport Complex) based on an unestablished customary and traditional use determination.

Position

The Alaska Department of Fish & Game (ADF&G) is **OPPOSED** to this proposal as it sees its passage as out of alignment with 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.