

<b>WP26–37 Executive Summary</b>	
<b>General Description</b>	Wildlife Proposal WP26-37 requests to remove the firearm restrictions for beaver trapping in Units 9 and 17. <i>Submitted by: Bristol Bay Subsistence Regional Advisory Council</i>
<b>Proposed Regulation</b>	<p><b>Units 9, 17—Beaver Trapping</b></p> <p>No limit <span style="float: right;"><i>Oct. 10-Mar. 31.</i></span></p> <p><del>2 beavers per day; only firearms may be used</del> <span style="float: right;"><del><i>Apr. 15-May 31.</i></del></span></p>
<b>OSM Conclusion</b>	<b>Support Proposal WP26-37 with modification</b> to allow the take of beavers by firearm under a trapping license in the unit-specific provisions of Units 9 and 17.
<b>Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation</b>	<b>Support OSM modification</b>
<b>Bristol Bay Subsistence Regional Advisory Council Recommendation</b>	<b>Support OSM modification</b>
<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>Support OSM modification.</b>
<b>Written Public Comments</b>	<b>None</b>

**Wildlife Analysis  
WP26-37**

**ISSUE**

Proposal WP26-37, submitted by the Bristol Bay Subsistence Regional Advisory Council (Council), requests to remove the firearm restrictions for beaver trapping in Units 9 and 17.

**Proponent Statement**

The proponent states that this proposal is a simplification of regulations and aligns with recent changes to State regulations through adoption of State Proposals 21 and 37 in January 2025, effective July 1, 2025. This simplification would be easier for users by matching State and Federal regulations as well as removing unclear regulations regarding beaver in Unit 9.

**Current Federal Regulations**

**Unit 9—Beaver Hunting**

<i>Units 9B and 9E—2 beavers per day</i>	<i>Apr. 15-May 31.</i>
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**Units 9, 17—Beaver Trapping**

<i>No limit</i>	<i>Oct. 10-Mar. 31.</i>
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<i>2 beavers per day; only firearms may be used</i>	<i>Apr. 15-May 31.</i>
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**Proposed Federal Regulations**

**Units 9, 17—Beaver Trapping**

No limit	<i>Oct. 10-Mar. 31.</i>
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<del><i>2 beavers per day; only firearms may be used</i></del>	<del><i>Apr. 15-May 31.</i></del>
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## Relevant Federal Regulations

**§\_\_.26(d) Trapping furbearing animals.** *The following methods and means of trapping furbearers for subsistence uses pursuant to the requirements of a trapping license are prohibited, in addition to the prohibitions listed at paragraph (b) of this section:*

*(3) Taking beaver by any means other than a steel trap or snare, except that you may use firearms in certain Units with established seasons as identified in Unit-specific regulations found in this subpart;*

### §\_\_.26(n)(9) Unit 9

*(iii) Unit-specific regulations:*

*(A) If you have a trapping license, you may use a firearm to take beaver in Unit 9B from April 1 through May 31 and in the remainder of Unit 9 from April 1 through 30.*

### §\_\_.26(n)(17) Unit 17

*(iii) Unit-specific regulations:*

*(C) If you have a trapping license, you may use a firearm to take beaver in Unit 17 from April 15 through May 31. You may not take beaver with a firearm under a trapping license on National Park Service lands.*

## Current State Regulations

### 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions

*(a) The following methods and means of taking furbearers under a trapping license are prohibited, in addition to the prohibitions in 5 AAC 92.080:*

*(3) taking beaver by any means other than a steel trap or snare, except that*

*(A) a firearm may be used to take beaver in Units 1-5, 8, 18, 22, and 23 throughout the seasons and with the bag limits established in 5 AAC 84;*

*(B) a firearm or bow and arrow may be used to take beaver throughout the seasons and with the bag limits established in 5 AAC 84*

### Unit 9–Beaver Trapping

*No limit*

*Oct. 10-May 31*

## Unit 17–Beaver Trapping

*No limit*

*Oct. 10-May 31*

### Extent of Federal Public Lands

Unit 9 is comprised of approximately 55% Federal public lands that consist of 30% National Park Service (NPS), 22% U.S. Fish and Wildlife Service (USFWS), and 3% Bureau of Land Management (BLM) managed lands.

Unit 17 is comprised of approximately 28% Federal public lands that consist of 21% USFWS, 4% BLM, and 3% NPS managed lands.

### Customary and Traditional Use Determination

All rural residents have a customary and traditional use determination for beaver in Units 9D.

Residents of Units 9A, 9B, 9C, 9E, and 17 have a customary and traditional use determination for beaver in Units 9A, 9B, 9C, 9E and 17.

### Regulatory History

Federal subsistence trapping regulations for beaver in Units 9 were adopted from State trapping regulations in 1990 when the Federal subsistence management program began. In Unit 9, seasons were Jan. 1-Mar. 31 with a limit of 40 beavers per season. In Unit 17A, seasons were Jan. 1-31 with a limit of 20 beavers per season, and in Units 17B and 17C, seasons were Jan. 1-Feb. 28 with a limit of 20 beavers per season. Since 1990, seasons, harvest limits, and method and means have been expanded to accommodate the needs of subsistence users and expanding beaver populations in the Bristol Bay area.

In 1997, the Alaska Board of Game (BOG) modified beaver trapping regulations for Unit 17 to allow the use of firearms to shoot two beaver per day from April 15 – May 31 and increased the harvest limit to 40 beaver per season from Nov. 10 – Feb. 28, effective November 10, 1997.

In April 1997, the Board adopted Proposal 97-51 to align State and Federal trapping seasons in Unit 17 for beaver, otter, muskrat, Arctic fox, red fox, lynx, mink, weasel, and wolverine as well as increase the harvest limit for beaver from 20 to 40 per season.

In 2002, the Board adopted Proposal WP02-27 to align Federal and State beaver trapping regulations in Unit 17, which included the 2 beaver per day; only firearms may be used from Apr. 15-May 31 restriction. At the time, this provision created additional subsistence opportunity by allowing an additional method and means to harvest beaver.

In 2003, the Board adopted Proposal WP03-27 with modification to increase the beaver trapping limit to ‘no limit’ in Units 9 and 17. The modification was to also extend the season to open October 10 in both units. The proposal increased subsistence opportunity and aligned with recent changes to State regulations, reducing regulatory complexity. The 2 beaver per day firearm restriction also then applied to Unit 9.

In 2025, the BOG adopted Proposals 21 and 37, removing 2 per day, only firearm may be used regulatory language for Units 9 and 17, respectively (BOG 2025). This removed unnecessary regulatory restrictions that caused confusion with users and law enforcement (BOG 2025). The Alaska Department of Fish and Game (ADF&G) submitted both proposals, stating there are no conservation concerns for beaver in either unit, and the firearms restriction is prohibitive when there is ‘no limit’ via trapping (ADF&G 2025a; BOG 2025). Additionally, Unit 9 hunting regulations for beaver are ‘no limit’ with no closed season, so the firearm restriction under a trapping license is unreasonably restrictive (BOG 2025).

## **Biological Background**

### Unit 9

In Unit 9, beaver are found on the mainland north of Port Moller. The most productive beaver habitat in the unit has a dependable water supply with little fluctuation in stream flow and is adjacent to abundant and easily accessible willow, aspen, cottonwood, or birch vegetation. Beavers are found from sea level to elevations of 2,000 feet (Vande Voort and Lichwa 2024). Biological information for beavers in Unit 9 is sparse. However, local residents as well as Federal and State Biologists have noted that the beaver population has been increasing in the unit. ADF&G considers beaver populations in Unit 9 healthy with no conservation concerns (ADF&G 2025a; BOG 2025).

From the late 1990s through RY08, trappers in Unit 9 rated beaver as “abundant” and “increasing.” Beaver abundance is probably increasing in Unit 9 because of 1) decreasing number of trappers and 2) continued colonization of beavers into the southwest portion of the Alaska Peninsula (Vande Voort and Lichwa 2024). Beavers were listed as “common” to “scarce” at the Region IV level during RY17–RY23 (Bogle 2023, 2025; Vande Voort and Lichwa 2024). Region IV includes Units 9-11, 12, 14A, 14B, 16, and 17. Harvest is showing a decreasing trend for Unit 9. As local trappers have described beaver numbers as abundant, the harvest decline may be explained by a decline in trappers (Vande Voort and Lichwa 2024).

Beaver have historically been an important furbearer and food source in Unit 9. Beaver dams do impede fish movement. However, as beaver cut down small trees and clear away brush, they create new habitats that are ideal for other animals. Waterfowl use these areas for feeding and nesting. Ponds created by beavers often serve as fish habitat (Lichwa and Lansiedel 2025).

### Unit 17

State management objectives for beaver in Unit 17 include: Maintain a beaver population in Unit 17A at an average stream density index of 1.0 cache per river mile. Maintain beaver populations throughout Units 17B and 17C at a level sufficient to sustain an average stream density of 1.2 caches per river mile. However, cache surveys have not been conducted since 2002 (Lichwa and Landsiedel 2025).

Historically, beavers have been the most important furbearer in Unit 17. They are abundant throughout most of the unit and occur in all major drainages and most smaller tributaries. Season closures in parts of Unit 17 have occurred on several occasions since 1900 to allow area or drainage populations to recover from trapping pressure. Beavers provide an important food item for local residents in the unit. Beavers may also suffer high mortality rates along major rivers during spring break up periods, although predation likely accounts for the majority of beaver mortality in Unit 17 (Lichwa and Landsiedel 2025).

While biological data for beaver in Unit 17 are sparse, trapper questionnaires from RY18-RY23 indicate beavers are common/scarcely with no change in the population trend (Bogle 2021a, 2021b, 2022, 2023, 2025; Spivey 2020). There are no conservation concerns for beaver in Unit 17 (ADF&G 2025a).

### **Harvest History**

Beavers in Units 9 and 17 are required to be sealed, providing harvest information.

### Unit 9

Beaver harvest and trapper numbers in Unit 9 have declined in recent years. Beaver harvest has declined 80% from an annual average of about 460 in the 1970s, to 90 in the 2010s. During the same time period, the number of trappers sealing fur in Unit 9 declined by about 60% (Lichwa and Landsiedel 2025). From 2012–2023, beaver harvest has continued to decline, averaging 73 beavers annually (**Figure 1**). Trapper numbers have also continued to steadily decline (ADF&G 2025a).

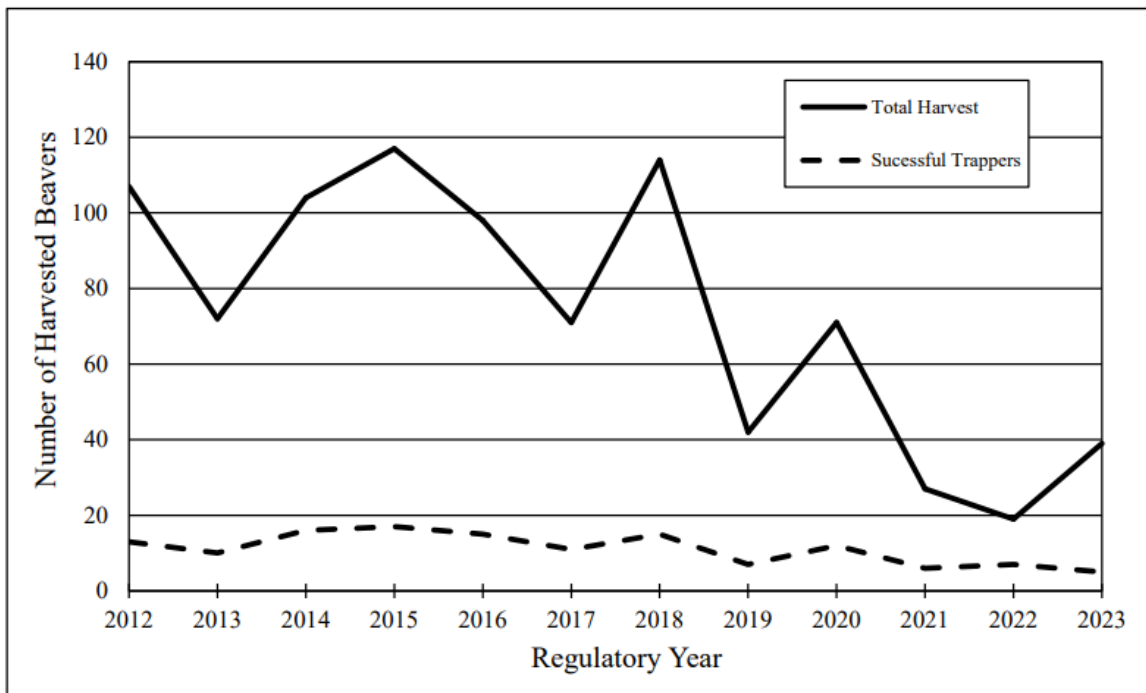
The reduction in harvest during the 1990s was primarily attributed to reduced prices for beaver pelts, a high cost in both effort and expenses, and a diminished interest in trapping among village residents. Poor trapping and traveling conditions have likely contributed to the more recent reductions in harvest (Lichwa and Landsiedel 2025). Nuisance beaver issues are only a concern along the highway between King Salmon and Naknek. The vast majority of beaver harvest in Unit 9 occurs by trapping/snaring (**Figure 2**, ADF&G 2025a).

### Unit 17

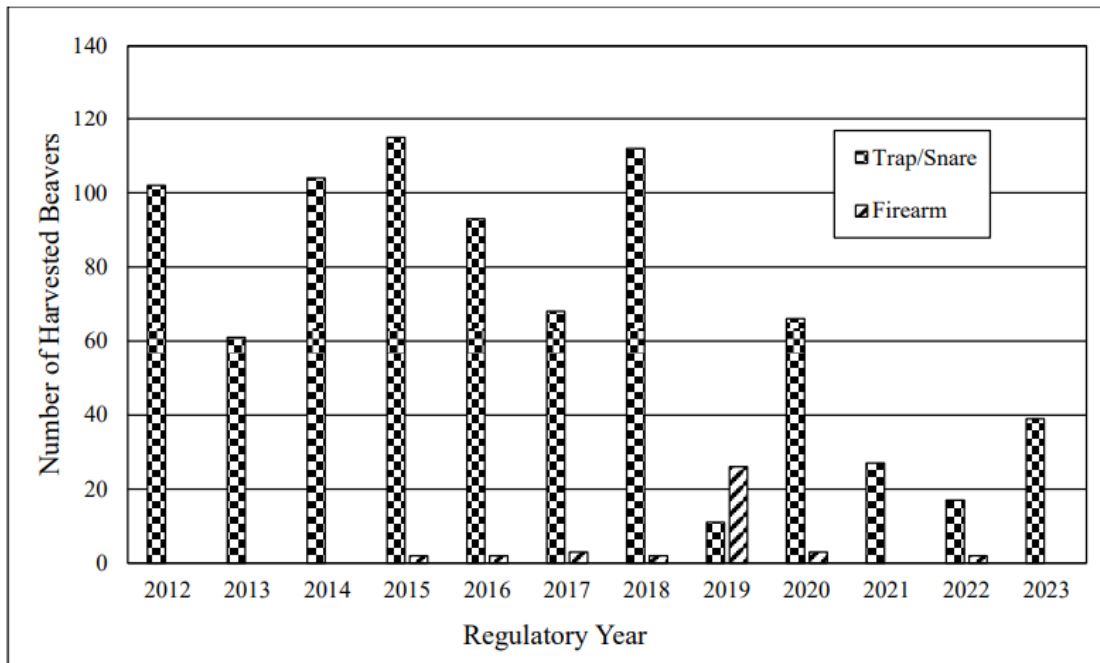
Of the furbearer species in Unit 17, beaver is the most consistently used by trappers and represents an important commercial and subsistence resource as they are common and easy to trap (Lichwa and Landsiedel 2025). Beavers were once the most important and sought-after furbearer in Unit 17, with

>3,000 being sealed in some years during the 1980s. Since 2018, total reported beaver harvest has averaged < 60 beavers/year, while the number of trappers has averaged < 10 trappers/year (**Figure 3**). Low fur prices, number of trappers, weather, and the costs associated with trapping have contributed to the decline in beaver trapping. However, the importance of beaver as food for local residents assures a base level of harvest regardless of other factors. Trapping/snaring is the most common method of beaver harvest in Unit 17 (**Figure 3**), while October is the month when the majority of beaver harvest occurs (ADF&G 2025a; Lichwa and Landsiedel 2025).

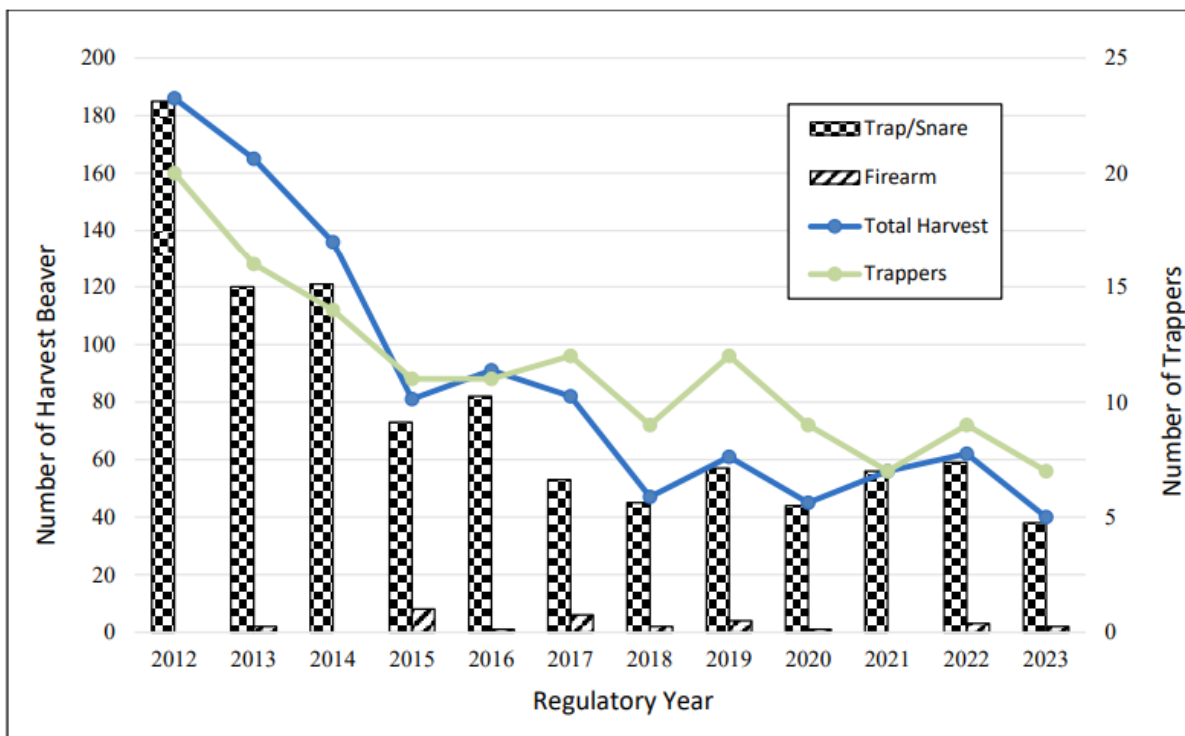
However, harvest sealing records do not fully represent subsistence hunting effort or trapping success as beavers harvested primarily for food often are not sealed. Beavers harvested during the spring are primarily used for food as pelts are not in prime condition. Most of the beaver taken in Unit 17 are taken by local residents (ADF&G 2025a).



**Figure 1.** Number of harvested beaver and successful trappers in Unit 9, regulatory years 2012-2023. Figure taken from ADF&G Staff comments to the Alaska Board of Game on Proposal 21 (ADF&G 2025a).



**Figure 2.** Unit 9 beaver harvest by method of take 2012-2023, excludes beaver taken by unknown method. Figure taken from ADF&G Staff comments to the Alaska Board of Game on Proposal 21 (ADF&G 2025a).



**Figure 3.** Number of harvested beaver and trappers by method of take during regulatory years 2012-2023 in Unit 17. Beavers harvested by unknown method are not included in method columns but are reflected in total harvest. Figure taken from ADF&G Staff comments to the Alaska Board of Game on Proposal 37 (ADF&G 2025a).

## Alternatives Considered

One alternative considered was to eliminate the statewide prohibition on taking beavers by firearm under a trapping license under § \_\_.26(d)(3) (see Relevant Federal Regulations section). Currently, Federal regulations are more restrictive than State regulations, which allow beavers to be taken by firearm under a trapping license Statewide pursuant to unit-specific seasons and harvest limits. Removing this prohibition would increase opportunity for federally qualified subsistence users statewide and reduce regulatory complexity by aligning with State regulations. However, this alternative is outside the scope of this proposal. However, a proposal could be submitted in the future to effect this change.

Given that general Federal regulations prohibit the take of beaver by firearm under a trapping license, except as provided in unit-specific regulations, another alternative considered was to allow the take of beaver by firearm consistent with the trapping seasons and harvest limits in Units 9 and 17. If this restriction is just eliminated as proposed in the submitted proposal, Units 9 and 17 would revert to the general regulations, which completely prohibit the take of beaver by firearm under a trapping license. This alternative would meet the intent of the proponent, increase opportunity for federally qualified subsistence users, and better align with State regulations and opportunity.

## Discussion and Effects

If Proposal WP26-37 is adopted, users would not be able to take any beavers by firearm under a trapping license in Units 9 and 17 under Federal regulations, decreasing subsistence opportunity. General Federal regulations prohibit the take of beaver by firearm unless excepted in unit-specific regulations. Therefore, if the unit-specific provisions in Units 9 and 17 are eliminated, they would revert to the general Federal regulations. However, users may already harvest an unlimited number of beavers by firearm during the entire trapping season on most Federal lands in these units under State regulations.

No impacts to the beaver population are expected as there are no conservation concerns for beaver in either unit, trapper numbers and beaver harvests have been declining, and the vast majority of beaver are harvested via trap/snare, not by firearm.

However, any regulation change affecting the take of furbearers by firearm under a trapping license would not apply on any NPS lands in Units 9 and 17, including Lake Clark National Park and Preserve, Katmai National Preserve, and Aniakchak National Monument. On NPS lands, the take of a free-ranging furbearer with a firearm or bow and arrow under a trapping license is prohibited, except to dispatch a trapped animal (36 CFR, Section 1.4 and 13.1, Hunter 2002).

## OSM CONCLUSION

**Support Proposal WP26-37 with modification** to allow the take of beavers by firearm under a trapping license in the unit-specific provisions of Units 9 and 17.

The draft regulations read:

### §\_\_.26(n)(9) Unit 9

*(iii) Unit-specific regulations:*

*(A) If you have a trapping license, you may use a firearm to take beaver in ~~Unit 9B from April 1 through May 31 and in the remainder of Unit 9~~ **throughout the season and consistent with established harvest limits** ~~from April 1 through 30.~~*

### §\_\_.26(n)(17) Unit 17

*(iii) Unit-specific regulations:*

*(C) If you have a trapping license, you may use a firearm to take beaver in Unit 17 **throughout the season and consistent with established harvest limits** ~~from April 15 through May 31.~~ You may not take beaver with a firearm under a trapping license on National Park Service lands.*

## Justification

This proposal increases subsistence opportunity, decreases regulatory complexity, and there are no conservation concerns.

This modification is required to meet the proponent's intent of increasing opportunity and aligning Federal and State regulations due to general Federal regulations in §\_\_.26(d)(3) prohibiting the take of beaver by firearm under a trapping license.

## LITERATURE CITED

ADF&G. 2025a. Alaska Department of Fish and Game Staff Comments for Proposals 1-23, 25-27, 29-38, 45-46, 51-54, 64-67, 70-79, and 81-84 Central / Southwest Region Proposals. Wasilla, AK.

[https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2024-2025/csw/dfg\\_comments-11.07.2024.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2024-2025/csw/dfg_comments-11.07.2024.pdf) . 84pp. Retrieved: May 25, 2025.

ADF&G. 2025b. Alaska Department of Fish and Game Board of Game Dillingham Area Proposals RC 4, Tab 3.2. Wasilla, AK. [https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2024-2025/csw/rc\\_4\\_tab\\_3.2.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2024-2025/csw/rc_4_tab_3.2.pdf). 84 pp. Retrieved: May 26, 2025.

- BOG. 2025. Alaska Board of Game Proposals Central / Southwest Region Proposal. Wasilla, AK.  
<https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=01-10-2025&meeting=wasilla>  
Retrieved: May 25, 2025.
- Bogle, S. E. 2021a. 2019 Alaska trapper report: 1 July 2019–30 June 2020. Division of Wildlife Conservation, Wildlife Management Report ADF&G/DWC/WMR-2021-2, Juneau.
- Bogle, S. E. 2021b. 2020 Alaska trapper report: 1 July 2020–30 June 2021. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2021-3, Juneau.
- Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau.
- Bogle, S. E. 2023. 2022 Alaska Trapper Report: 1 July 2022-30 June 2023. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2023-3, Juneau.
- Bogle, S. E. 2025. 2023 Alaska trapper report: 1 July 2023–30 June 2024. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2025-1, Juneau.
- Hunter, P. 2002. Wildlife Biologist. National Park Service. Anchorage, Alaska. Personal Communication
- Lichwa, E. M., and J. Landsiedel. 2025. Furbearer management report and plan, Game Management Unit 17: Report period 1 July 2017–30 June 2022, and plan period 1 July 2022–30 June 2027. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2025-38, Juneau.
- Spivey, T. J. 2020. 2018 Alaska trapper report: 1 July 2018–30 June 2019. Division of Wildlife Conservation, Wildlife Management Report ADF&G/DWC/WMR-2020-1, Juneau.
- Vande Voort, A. M., and E. M. Lichwa. 2024. Furbearer management report and plan, Game Management Units 9 and 10: Report period 1 July 2017–30 June 2022, and plan period 1 July 2022–30 June 2027. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2024-19, Juneau.

## **SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION**

### **Kodiak/Aleutians Alaska Subsistence Regional Advisory Council**

**Support as modified by OSM.** The Council supports this proposal as it increases subsistence opportunity in Unit 9 and aligns with the home region's needs. Beaver harvest provides important food and fur, and reducing some dam impacts may benefit salmon passage.

### **Bristol Bay Alaska Subsistence Regional Advisory Council**

**Support as modified by OSM.** The Council supports the proposal as modified by OSM to allow the use of firearms for beaver harvest throughout the season, consistent with the intent of the original proposal. Members noted that beaver trapping is low while abundance is high across the region, based on observation during regular travel. Beavers affect fish passage, trails, and travel routes, and the Council concluded that there are no conservation concerns. Adoption of the OSM-recommended language aligns federal regulations with the state regulations, reducing confusion. The Council determined that the proposal provides reasonable harvest flexibility, reflects current conditions, and supports practical, effective wildlife management.

## **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**

**Support as modified by OSM.** No Comment submitted.