

<b>WP26–38/39 Executive Summary</b>	
<b>General Description</b>	<p>Wildlife Proposal WP26-38 requests to increase the harvest limit for brown bears in Unit 17 from 1 bear to 2 bears and eliminate the State registration permit requirement. <i>Submitted by: Dan Dunaway</i></p> <p>Wildlife Proposal WP26-39 requests to extend the brown bear season in Unit 17 to year-round. <i>Submitted by: Bristol Bay Subsistence Regional Advisory Council</i></p>
<b>Proposed Regulation</b>	<p><u>WP26-38</u></p> <p style="text-align: center;"><b>Unit 17—Brown bear</b></p> <p style="text-align: center;"><i>Unit 17—<del>1</del> 2 bears by State registration permit only</i> <span style="float: right;"><i>Sep. 1-May 31</i></span></p> <p><u>WP26-39</u></p> <p style="text-align: center;"><b>Unit 17—Brown bear</b></p> <p style="text-align: center;"><i>Unit 17—1 bear by State registration permit only</i> <span style="float: right;"><i>Sep. 1-May 31</i> <i>July 1 – June 30</i></span></p>
<b>OSM Conclusion</b>	<b>Support</b>
<b>Bristol Bay Subsistence Regional Advisory Council Recommendation</b>	<b>Support</b>
<b>Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Recommendation</b>	<b>Support</b>

<b>WP26–38/39 Executive Summary</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</b>
<b>Written Public Comments</b>	<b>None.</b>

## **Wildlife Analysis WP26-38/39**

### **ISSUE**

Proposal WP26-38, submitted by Dan Dunaway, requests to increase the harvest limit for brown bears in Unit 17 from 1 bear to 2 bears and eliminate the State registration permit requirement.

Proposal WP26-39, submitted by the Bristol Bay Subsistence Regional Advisory Council (Council), requests to extend the brown bear season in Unit 17 to year-round.

### **Proponent Statement**

#### WP26-38

The proponent states that beginning in 2011, the Alaska Board of Game (BOG) adopted a 2 bear per year harvest limit in an effort to reduce human-bear conflicts and to provide greater opportunity to hunters while the bear population was thought to be large and increasing. The 2-bear limit does not appear to have significantly increased local bear harvest. Federal regulations currently allow the sale of hides as handicrafts and an additional bear would provide added economic opportunity to local subsistence users. Public comments made at recent Bristol Bay Council meetings indicate brown bears are very abundant in Unit 17 and a 2-bear bag limit is not likely to have any negative impact on their populations. This proposal would also remove the State registration permit requirement, but would not eliminate the requirement to seal harvested bears with the Alaska Department of Fish and Game (ADF&G). The State has not been registering brown bear hunter in Unit 17 for some time now.

#### WP26-39

The proponent states that the BOG adopted Proposal 32 at their January 2025 meeting to extend the Unit 17 brown bear season to year-round, effective July 1, 2025. This proposal would align State and Federal brown bear seasons.

### **Current Federal Regulations**

#### **Unit 17—Brown bear**

*Unit 17—1 bear by State registration permit only*

*Sep. 1-May 31*

**Proposed Federal Regulations**

WP26-38

**Unit 17—Brown bear**

*Unit 17—~~1~~ 2 bears by State registration permit only*

*Sep. 1-May 31*

WP26-39

**Unit 17—Brown bear**

*Unit 17—1 bear by State registration permit only*

~~*Sep. 1-May 31*~~

***July 1 – June 30***

**Current State Regulations**

**Unit 17—Brown bear**

*Both 2 bears every regulatory year No closed season*

*Residents 2 bears every regulatory year by permit RB500 No closed season  
(Subsistence hunt)*

**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 17 is comprised of approximately 28% Federal public lands that consist of 21% U.S. Fish and Wildlife Service (USFWS), 4% National Park Service (NPS), and 3% Bureau of Land Management (BLM) managed lands.

### **Customary and Traditional Use Determination**

Rural residents of Unit 17, Akiak, Akiachak, Goodnews Bay, Kwethluk, and Platinum have a customary and traditional use determination for Brown bear in Unit 17A, those portions north and west of a line beginning from the Unit 18 boundary at the northwestern end of Nenevok Lake, to the southern point of upper Togiak Lake, and northeast towards the northern point of Nuyakuk Lake to the Unit 17A boundary.

Rural residents of Unit 17 and Kwethluk have a customary and traditional use determination for Brown bear in Unit 17B, beginning at the Unit 17B boundary, those portions north and west of a line running from the southern point of upper Togiak Lake, northeast to the northern point of Nuyakak Lake, and northeast to the point where the Unit 17A boundary intersects the Shotgun Hills.

Rural residents of Unit 17, Akiak, Akiachak, Goodnews Bay and Platinum have a customary and traditional use determination for Brown bear in Unit 17A, remainder.

Rural residents of Unit 17, Akiak, and Akiachak have a customary and traditional use determination for Brown bear in Unit 17B, that portion draining into Nuyakak Lake and Tikchik Lake.

Rural residents of Unit 17 have a customary and traditional use determination for Brown bear in Unit 17B, remainder and Unit 17C.

### **Regulatory History**

Federal subsistence regulations for brown bear in Unit 17 have remained the same since 1999.

In 2011, the BOG adopted Proposal 29 to increase the brown bear harvest limit in Unit 17 from 1 bear to 2 bears, extend the season to Aug. 20-May 31, and eliminate resident locking tags (ADF&G 2011). ADF&G commented that brown bear numbers in Unit 17 were healthy and had likely increased during the past 10 years, and that increasing the harvest limit was not expected to greatly increase harvest (ADF&G 2011).

In January 2025, the BOG adopted Proposal 32, extending the Unit 17 brown bear season to year-round, effective July 1, 2025. Unreported harvest is an issue in this area and by extending the resident season to year-round, it is hoped that more people will report their harvest (ADF&G 2025a).

### **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**

Brown bears are found throughout Unit 17. In spring, brown bears scavenge over-winter mortalities of moose and caribou, and marine carcasses on beaches as well as predate moose and caribou calves. Brown bears forage for clams in tidal mud flats, and sedges and roots in lowland sedge flats. In summer, brown bears occupy mid-to-low elevation habitats on tidal flats and sedge meadows. Brown bears are frequently observed along rivers, streams, and lakeshores awaiting salmon. In fall, brown bears continue pursuing salmon at low elevations, and upstream into mountainous areas. After salmon runs have passed, brown bears will forage for hunter-harvested caribou and moose carcasses, and berries in riparian woodlands and open hillsides (Peterson 2023). While these activities are typical behaviors of brown bears, not all Unit 17 go to the coastal areas (Rinaldi 2025).

Brown bears begin denning in late fall, typically October through November. Denning locations are located primarily in steep rocky areas, and secondarily in low-elevation tundra. Observations indicate

that bears emerge from dens from late April through mid-to-late May. Mating occurs from mid-May through mid-to-late June (Peterson 2023).

The State management objective for brown bears in Unit 17 is to maintain a brown bear population that will sustain an annual harvest of 50 bears composed of at least 50% males (Peterson 2023).

Population information for brown bears in Unit 17 is sparse. The most recent density estimate is from 2004, which estimated 103 bears per 1,000 mi<sup>2</sup> (Walsh et al. 2010 as cited in Peterson 2023). During two flights in October 2023 in the Bear Control Focus Area, which includes portions of Units 17B, 18 and 19B, 33 brown bears were observed, 22% being maternal sows, indicating high reproductive success (ADF&G 2025d). ADF&G has observed no conservation concerns for brown bear in Unit 17 (ADF&G 2025b).

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

Alaska Natives have harvested bears for at least 14,000 years (Birkedal 2001). Brown bears have traditionally been a very important part of the Alaska Native cultures. The Yup'ik people call the brown bear "*taquukapiaq*," "*taquukaller*," "*caraayak*," "*carayall'er*," or "*ungungsiit*." Brown bears and brown bear hunting are treated very respectfully in the Yup'ik culture. Brown bear hunting is symbolically charged and hunters avoid talking about these animals and future hunt plans (Hensel 1994). Brown bears have been hunted for their meat, and hides, and other parts of the bear have been used for traditional medicine or fashioned into such things as tools, ceremonial regalia, and art (Behnke 1981). Brown bear fat is rendered and is sometimes used as a condiment akin to seal oil for dipping dried meat and fish and is mixed with berries and fish to make ice cream, "*akutaq*" (Hensel 1994). Dena'ina Athabascans in the Lake Clark and Katmai areas competed directly with brown bears for subsistence resources; it is thought that the Dena'ina likely displaced brown bear from the very best salmon fishing sites on certain rivers (Birkedal 2001). It has been customary practice of some Yup'ik villagers to use bear hides for mattresses, trimming on clothing, sitting pads when ice fishing, door coverings and skin for boats. Brown bear skulls are rarely removed from the field and traditionally are buried facing east at the kill site (Coffing 1991, Hensel 1994, Coffing et al. 2001).

Whole brown bear hides were traditionally used in special ceremonies in certain lower Yukon Villages (Nick 2003). Ceremonial, customary and traditional practices differ from village to village. The First Yup'ik Dance Performance in front of an audience might be done on a large mammal hide such as a brown bear hide to indicate the head of the family is a great subsistence hunter called "*Nukall'piaq*." Ceremonies for Naming-of-a-Person might also be done with the use of a whole brown bear hide; such ceremonies are to help the person being named to be prosperous in life (Nick 2003). Shamens used a variety of animal hides to show their powers when performing rituals. In the exhibit, *The Living Tradition of Yup'ik Masks*, there is a bear claw dance headdress from Bristol Bay, dated around 1882 (McClenahan 2002). The headdress was worn by a young woman at the Feast of the Dead when she received gifts and received the name of the relative who had died. Another ritual item with a bear theme is a bear decorated dance stick dated 1883 from the Iliamna Lake area (McClenahan 2002).

Brown bear harvests for food remain part of the contemporary subsistence pattern in some of the predominantly Yup'ik communities of Unit 18 and Unit 17A. An overview in the early 1990's concluded:

The primary communities where brown bear meat is eaten regularly are those along the lower Kuskokwim River and along Kuskokwim Bay in GMU 18 .... We suspect that [Togiak and Twin Hills] have harvest and use patterns that are similar to those of Goodnews Bay, Quinhagak, and Kwethluk (Coffing and Pete 1992) [cited in Andrew and Brelsford 1993].

For the period prior to 1992, data on brown bear harvests in the Unit 18 and Unit 17A are found in several community studies conducted by ADF &G Division of Subsistence and in ADF&G sealing records. Sealing of brown bears was legally required from 1961 through the spring of 1992 in western Alaska, but participation by subsistence users was very limited, and few subsistence harvests were reported through this system. These sources are summarized in Andrew and Brelsford (1993):

In general, the information on harvest recorded through ethnographic research is considerably higher than that reported through sealing records. For the period of 1985- 1986, in Kwethluk, eight households took an estimated nine bears (Coffing 1991). For Nunapitchuk, during 1983, one hunter was reported to have taken a single brown bear (Andrews 1989). For Quinhagak during the early 1980's, "several brown bear are taken each year ... " (Wolfe et al. 1984:322). For Togiak in 1983, an estimated 8-10 brown bears were taken each spring by a few hunters, and while fall hunting for brown bear was described, no estimate of fall harvests was made (ibid.).

In contrast, bear sealing records report harvests in these villages only infrequently, and then generally only in a single bear taken in a year. In the single anomaly in the bear sealing data, ten brown bears were reported sealed in Goodnews Bay in 1984–85.

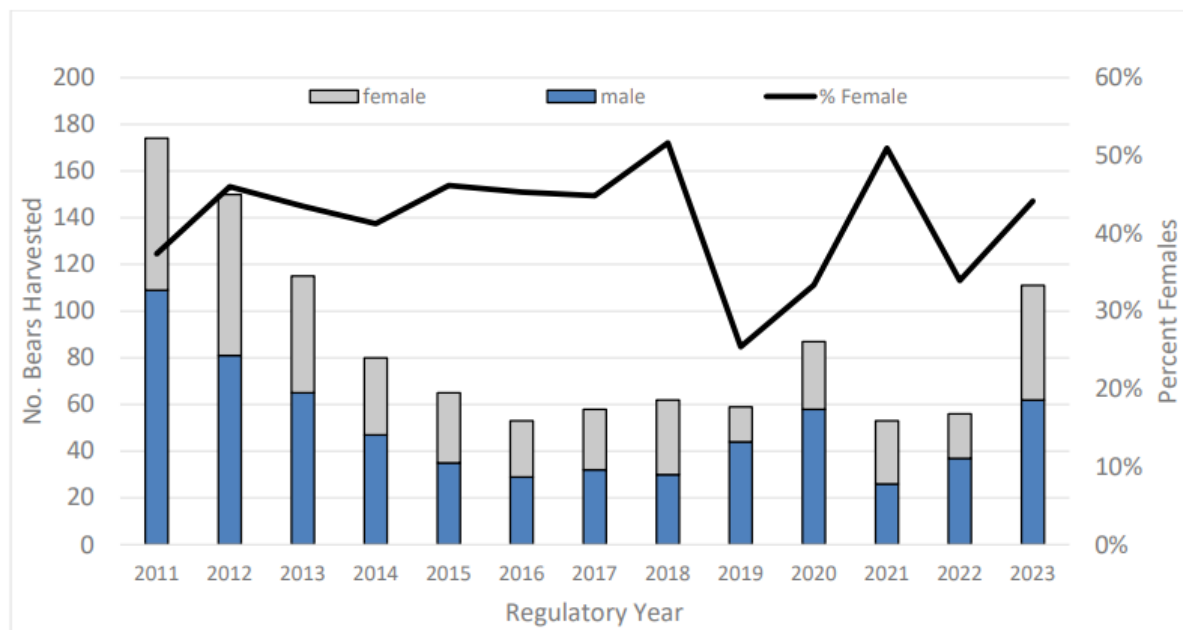
## Harvest History

All brown bears harvested in the State's general hunt are required to be sealed, providing harvest information. Bears harvested by State subsistence permit, RB500, which includes any harvested under Federal regulations, only need to be sealed if they are removed from Unit 17. However, the RB500 permit has only been issued once since Regulatory Year (RY) 2020/21, with no harvest reported (Landsiedel 2025 pers. comm.). Reported harvest reflects only a portion of the brown bears harvested in Unit 17, as each year reports of shot and left bears reach the Alaska Wildlife Troopers and ADF&G (ADF&G 2025a).

Most brown bear harvest in Unit 17 occurs in Unit 17B (Peterson 2023). On average, nonresidents and residents account for 75% and 25% of the Unit 17 brown bear harvest, respectively (ADF&G 2025c). From 2011 to 2023, harvest of brown bears in Unit 17 ranged from a low of 54 in 2016, to a high of 167 in 2011 (**Figure 1**). The high in 2011 likely reflects a short-term spike when the harvest limit increased to two bears under State regulations. Over the same period, the harvest objective of at least 50% males has been exceeded twice, while harvest exceeded 50 bears in all years (**Figure 1**). From

2011 to 2023, the average number of hunters who took two bears was 5 hunters per year (range 0–13), which comprised of 0–9% of the annual harvest. (ADF&G 2025a, Peterson 2023).

Unreported harvests of brown bears are known to occur in Unit 17. Reported human-bear conflicts are common throughout Unit 17 communities and at fishing and hunting camps. Landfills have long been an attractant for brown bears in Unit 17 communities, including Dillingham. Additionally, many people continue to feed their pets outside and do not keep their property clean of pet food. Many human-bear conflicts result in defense of life or property (DLP) kills and are rarely reported (Peterson 2023). Bears killed in DLP are often instances during June and July when residents are typically out fishing or berry picking but the resident bear season was closed (ADF&G 2025a). Individuals have expressed frustration at having to salvage the hide and skull only to surrender it to the State, leading to unreported harvest during the closed season (pre-2025) (ADF&G 2025a).



**Figure 1.** Brown bear harvest by sex in Unit 17 during regulatory years 2011–2023. Figure taken from ADF&G comments on Proposal 32 (ADF&G 2025b).

**Alternative(s) Considered**

One alternative considered is to retain the State registration permit as its removal requires all harvested bears to be sealed. Currently, bears taken under a registration permit in Unit 17 do not need to be sealed, unless the skin or skull is removed from the unit. However, the skin of the head and front claws are required to be removed from bears harvested by State subsistence permit at the time of sealing. (Note: While this requirement was eliminated under Federal regulations via adoption of Proposal WP24-01 as modified by OSM, it is still required under State regulations. Federal regulations also require compliance with conditions of State permits). This could impact the use of bear parts for handicrafts and sale of hides.

Additionally, the meat of brown bears is required to be salvaged under Federal regulations and State subsistence hunts in Unit 17, while the hide and skull are not. However, the hide and skull (but not the meat) is required to be salvaged in the State general hunts. Therefore, eliminating the State registration permit requirement may create law enforcement concerns if a user fails to salvage the hide while harvesting under Federal regulations.

State regulations apply on all Federal public lands in Unit 17, except in the portion of Lake Clark National Park (LACL) in the northeast corner of Unit 17B. Brown bear harvest is likely nonexistent in this portion of LACL due to its extreme remoteness and distance from Unit 17 communities. Therefore, eliminating the State registration permit may provide federally qualified subsistence users the flexibility to salvage only the hide under State regulations or only the meat under Federal regulations, although input from law enforcement on this would be beneficial.

The Office of Subsistence Management would appreciate feedback from subsistence users and the Bristol Bay Council on whether sealing all bears or obtaining a registration permit is preferable.

### **Discussion and Effects**

If Proposal WP26-38 and WP26-39 are adopted, the Unit 17 brown bear hunt would be extended to year-round with a 2-bear limit, providing additional opportunity for subsistence users under Federal regulations. The registration permit requirement would also be eliminated. No impacts to the brown bear population are expected as users may already harvest 2 brown bears year-round in Unit 17 under State regulations, including on Federal public lands (except within LACL where brown bear harvest is unlikely). Additionally, ADF&G will monitor for any increases in harvest for potential conservation concerns (ADF&G 2025a). Cubs and sows with cubs cannot be taken under State or Federal regulations, helping to prevent unsustainable harvests and promote recruitment.

Currently, unreported harvest is occurring in Unit 17. Extending the season to year-round may improve harvest reporting, especially for nuisance bears taken during the summer months near cabins and fish camps as reporting DLP kills is burdensome and requires the bear to be surrendered to the State. During consideration of State Proposal 32, individuals indicated they would prefer a year-round resident season allowing for legal harvest of bears during this time of increased subsistence activity (ADF&G 2025a).

However, eliminating the State registration permit requirement may decrease harvest reporting and increase the burden on subsistence users to seal all harvested bears. As the front claws and skin of the head are required to be removed at the time of sealing from any bear taken under State subsistence permits, eliminating the State registration permit could also benefit subsistence users who would like to retain the claws for use in handicrafts.

Adopting these proposals would also decrease regulatory complexity and confusion by aligning State and Federal regulations 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.” Currently Federal regulations are more restrictive than State regulations.

## OSM CONCLUSION

Support Proposals WP26-38 and WP26-39.

### Justification

These proposals increase subsistence opportunity and there are no conservation concerns as users may already harvest two bears year-round under State regulations and local residents harvest relatively few bears. These proposals also decrease regulatory complexity and may decrease the number of unreported harvests.

OSM supports eliminating the State subsistence permit requirement due to the permit's condition that the skin of the head and front claws are removed and retained at the time of sealing, which complicates the sale of hides and handicrafts. However, OSM looks forward to hearing from local subsistence users and the Bristol Bay Council on their preferences for retaining the State registration permit requirement or requiring sealing for all bears harvested under Federal regulations.

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## SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

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

**Support.** The Council supported aligning state and federal brown bear regulations, including a year-round season, based on consist local observations of healthy and abundant bear populations throughout the region. Members reported increased bear presence in villages and around fish camps, frequent nuisance bears, and repeated sightings of sow with three to four cubs, which is an indicator of stong population health supported by recent records salmon runs in Bristol Bay. Council members noted there is no conservation concern for brown bears in Unit 17 and that the proposal would not substantially increase harvest, but would reduce regulatory confusion, improve harvest reporting, and ease burdens associated with Defense of Life and Property situations. Members acknowledged regional variation in brown bear density and the importance of maintaining predator balance, but expressed board support for the proposal based on local knowledge and observed conditions.

### **Yukon-Kuskokwim Delta Subsistence Regional Advisory Council**

**Support.** The Council voted to support WP26-38/39. They note that it will increase harvest opportunity and there are no conservation concerns. This proposal will also align State and Federal regulations, reducing confusion for hunters.

## 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.** No Comment submitted.