

WP26–71 Executive Summary	
General Description	Wildlife Proposal WP26-71, requests increasing the harvest limit for brown bear in Unit 12 to two bears. <i>Submitted by: Eastern Interior Alaska Subsistence Regional Advisory Council</i>
Proposed Regulation	Unit 12—Brown Bear <i>Unit 12—1 2 bears</i> <i>Aug. 10-June 30.</i>
OSM Conclusion	Support
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	Support
Eastern Interior Alaska 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	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
WP26-71**

ISSUE

Wildlife Proposal WP26-71, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council (Council), requests increasing the harvest limit for brown bear in Unit 12 to two bears.

Proponent Statement

The proponent states that increasing the brown bear harvest limit in Unit 12 would provide additional opportunity for federally qualified subsistence users. In Unit 12, State hunting regulations already allow two bears for resident hunters. There are no conservation concerns for brown bear in this unit.

Current Federal Regulations

Unit 12—Brown Bear

<i>Unit 12—1 bear</i>	<i>Aug. 10-June 30.</i>
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Proposed Federal Regulations

Unit 12—Brown Bear

<i>Unit 12—1 2 bears</i>	<i>Aug. 10-June 30.</i>
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Current State Regulations

Unit 12—Brown Bear

<i>Unit 12</i>	<i>Residents: 2 bears every regulatory year</i>	<i>Aug 10-June 30</i>
	<i>Nonresidents: 1 bear every regulatory year</i>	<i>Aug 10-June 30</i>

Extent of Federal Public Lands

Unit 12 is comprised of approximately 61% Federal public lands that consist of approximately 49% National Park Service (NPS), 11% U.S. Fish and Wildlife Service (USFWS), and 1% Bureau of Land Management (BLM) managed lands.

Customary and Traditional Use Determination

Residents of Unit 12, Dot Lake, Chistochina, Gakona, Mentasta Lake, and Slana have a customary and traditional use determination (C&T) for brown bear in Unit 12.

The resident zone communities of Wrangell-St. Elias National Park (WRST) include 23 communities: Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Slana, Tazlina, Tanacross, Tetlin, Tok, Tonsina, and Yakutat.

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.

Regulatory History

In 1990, when the Federal management of subsistence fish and wildlife resources on Federal public lands began, Federal subsistence regulations were adopted from State regulations. At that time, there was no Federal subsistence brown bear hunt in Unit 12, and the C&T was ‘no subsistence.’

In 1997, the Federal Subsistence Board (Board) adopted Proposal WP97-23 with modification, which recognized the customary and traditional uses of brown bear in Unit 11, 12, 13, and 20E. In Unit 12, the rural residents of Unit 12 and Dot Lake were included in the C&T determination.

In 1998, the Board adopted Proposal P98-96 with modification to add Chistochina, Gakona, Mentasta Lake, and Slana to the C&T determination for brown bears in Unit 12. The Board also adopted Proposal P98-97, which established a Federal brown bear hunt in Unit 12. The harvest limit was one bear with a season of Aug. 10-June 30. Federal brown bear seasons and harvest limits in Unit 12 have not changed since.

In 2016, the Board adopted Proposal WP16-18, allowing brown bears to be hunted over bait in Unit 12 from Apr. 15-Jun. 30.

At its March 2024 meeting, the Alaska Board of Game (BOG) adopted Proposal 120 to increase the resident State brown bear harvest limit in Unit 12 from one bear per year to two bears per year. The

BOG concluded that there were no biological concerns (BOG 2024). Changing the harvest limit to 2 bears also allows for the sale of brown bear hides and skulls under State regulations.

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

ADF&G manages Unit 12 brown bear populations for maximum sustained hunting opportunity, although biological information is extremely limited. No population surveys for brown bears have been conducted in Unit 12. The last population estimate was in the fall of 2000 based on extrapolations from density estimate surveys conducted in similar habitats in Interior and Southcentral Alaska, harvest distribution, and using sex and age composition of harvested bears. The fall 2000 Unit 12 brown bear population was estimated at 350–425 bears (18.0–21.9 bears of all ages/1,000 km² of useable habitat) (Wells 2021). In 2024, ADF&G reported to the BOG that Unit 12 has relatively high densities of brown bear (BOG 2024).

Harvest History

The State management objective for Unit 12 brown bear is to manage harvests so the 3-year mean harvest does not exceed 28 brown bears (of which no more than 5 can be females greater than 5-years old) per year and includes at least 55% males in the harvest (Wells 2021). All brown bears in Unit 12 must be sealed within 30 days of harvest. The take of cubs and sows with cubs is prohibited under Federal and State regulations.

Annual harvest from 2002-2023 averaged 21 brown bears in Unit 12, ranging from 8-39 bears per year, which met the management objective of the 3-year mean harvest < 28 bears (**Figure 1**). Resident and nonresident harvest averaged 12 bears and 9 bears per year, respectively (Hunter 2025 pers. comm.). Although there has been some fluctuation over the years, the average harvest has remained relatively stable since 1983 (Wells 2021).

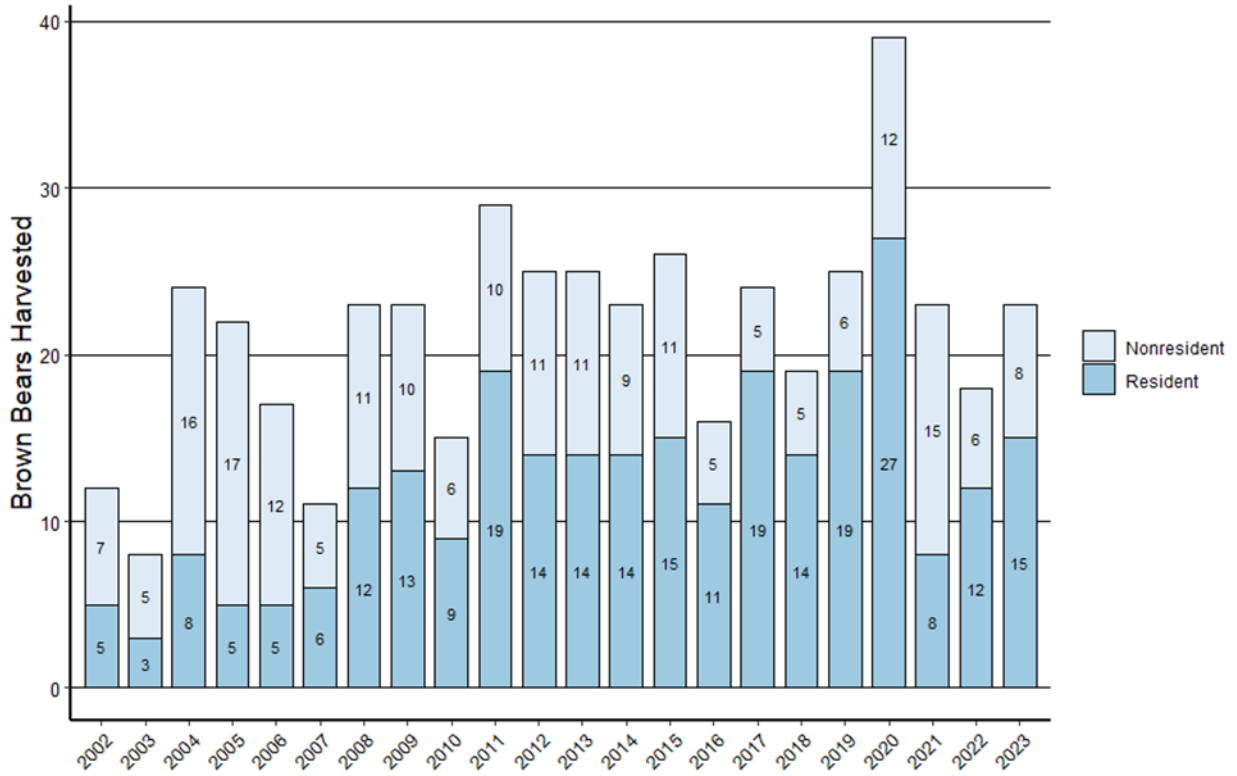


Figure 1. Unit 12 brown bear harvest by residency (Hunter 2025 pers. comm.)

Discussion and Effects

If adopted, this proposal would increase the brown bear harvest limit in Unit 12 to two bears, providing additional opportunities for federally qualified subsistence users to harvest brown bears under Federal regulations. No increases in harvest or impacts to the brown bear population are expected as users may already harvest two brown bears on most Federal public lands in Unit 12 under State regulations and harvest pressure is very low. The WRST lands in Unit 12 where State regulations do not apply are extremely remote where brown bear harvest is unlikely to occur. Although population data are extremely limited, there do not appear to be any conservation concerns due to low harvest pressure, prohibition on the take of sows with cubs protecting, and no observed substantial increases in brown bear harvests in other units where the harvest limit has increased to 2 bears. In fall of 2024, no hunter reported harvesting two bears from Unit 12 (ADF&G 2025).

Adopting this proposal would also decrease regulatory complexity 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.”

OSM CONCLUSION

Support Proposal WP26-71

Justification

This proposal increases harvest opportunity for federally qualified subsistence users. There are no conservation concerns due to low harvest levels and because Alaska residents may already harvest two bears in Unit 12 under State regulations.

LITERATURE CITED

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Southcentral Subsistence Regional Advisory Council

The Council **supported** WP26-71. The Council stated there are no conservation concerns for brown bear in this area, it would align with the state season, and it would benefit subsistence users.

Eastern Interior Alaska Subsistence Regional Advisory Council

The Council voted to **support** WP26-71 which they submitted. They noted that Unit 12 has a good brown bear population and that increasing the harvest limit is not expected to substantially increase harvest or affect the population. Most hunters target boars and only harvest one bear since it is so much work. The increase would provide more subsistence opportunity and an option to get one additional bear under Federal regulations. People often harvest brown bear in the fall when the bears are berry fed and the meat is good to eat.

The Council further noted that two bears can already be harvested under State regulations so this proposal would only really affect a remote portion of Unit 12 in Wrangell-St. Elias National Park. This proposal aligns State and Federal regulations and reduces regulatory complexity. However, the Council is concerned about the lack of data on bear population trends and emphasized the need for better monitoring.

INTERAGENCY STAFF COMMITTEE

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 DEPARTMENT OF FISH AND GAME COMMENTS

Support. No Comment submitted.

WRITTEN PUBLIC COMMENTS

The Ahtna Intertribal Resource Commission (AITRC)

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