

WP26-72B Executive Summary	
General Description	Wildlife Proposal WP26-72b, requests increasing the harvest limit for brown bear in Unit 20E to two bears. <i>Submitted by: Eastern Interior Alaska Subsistence Regional Advisory Council</i>
Proposed Regulation	<p>Unit 20E—Brown Bear</p> <p><i>Unit 20E—1 2 bears</i> <i>Aug. 10-June 30.</i></p>
OSM Conclusion	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	None

**Wildlife Analysis
WP26-72B**

ISSUE

Wildlife Proposal WP26-72b, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council (Council), requests increasing the harvest limit for brown bear in Unit 20E to two bears.

Proponent Statement

The proponent states that increasing the Unit 20E brown bear harvest limit would provide additional opportunity for federally qualified subsistence users. In Unit 20E, State hunting regulations already allow two bears for resident hunters. There are no conservation concerns for brown bear in this unit.

Note: Wildlife Proposal WP26-72a, also submitted by the Eastern Interior Council, requests recognition of the customary and traditional uses of brown bear by residents of Unit 20E.

Current Federal Regulations

Unit 20E—Brown Bear

Unit 20E—1 bear

Aug. 10-June 30.

Proposed Federal Regulations

Unit 20E—Brown Bear

Unit 20E—2 bears

Aug. 10-June 30.

Current State Regulations

Unit 20E—Brown Bear

Unit 20E

*Residents and Nonresidents: 2 bears every
regulatory year*

Aug 10-June 30

Extent of Federal Public Lands

Unit 20E is comprised of approximately 28% Federal public lands that consist of 21% National Park Service (NPS) managed lands and 7% Bureau of Land Management (BLM) managed lands.

Customary and Traditional Use Determination

Residents of Unit 12 and Dot Lake have a customary and traditional use determination (C&T) for brown bear in Unit 20E.

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 20E, and the C&T was 'no subsistence.'

In 1997, the 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 20E, the rural residents of Unit 12 and Dot Lake were included in the C&T determination.

In 1998, the Board adopted Proposal P98-97, which established a Federal brown bear hunt in Units 12 and 20E. The harvest limit was one bear with a season of Aug. 10-June 30. Federal brown bear seasons and harvest limits in Unit 20E have not changed since.

In 2004, the Alaska Board of Game (BOG) increased the State brown bear harvest limit in Unit 20E from one bear per year to two bears per year.

Current Events

Wildlife Proposal WP26-72a requests recognition of the customary and traditional uses of brown bear by residents of Unit 20E.

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 distributed throughout Unit 20E, although biological information is very limited. There have only been 2 population surveys conducted in Unit 20E in the last 40 years. One was conducted in the 1980s and estimated approximately 16 and 12 bears of all ages per 1,000 km² in May and November, respectively (Miller et al. 1997). The second survey was done in 2006 utilizing a DNA based mark and recapture method and resulted in an estimate of 10.7-13.4 bears of all ages per 1,000 km². No other population surveys for brown bears have been conducted since (Wells 2021). In 2024, ADF&G reported to the BOG that Unit 20E has relatively high densities of brown bear (ADF&G 2024).

State management objectives for brown bears in Unit 20E include to 1) Manage for temporary reductions in the brown bear population or for reduction in brown bear predation where it may be limiting moose population growth, and 2) After moose populations increase to desired levels, reduce bear harvests to allow for bear population stabilization or recovery (Wells 2021).

There has been an active intensive management program for moose in Unit 20E since 2004. However, the brown bear control portion of the program was removed in 2009 because bear removal objectives were not being met (ADF&G 2025). The increase in the State harvest limit in 2004, management objective of population reduction, and bear removal through intensive management from 2004-2009 indicates historically high densities of brown bears in Unit 20E and no conservation concerns for this population.

Cultural Knowledge and Traditional Practices

Please see the analysis for Proposal WP26-72a.

Harvest History

All brown bears in Unit 20E 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 2012-2023 averaged 17 brown bears in Unit 20E (**Figure 1**, ADF&G 2024). Although there has been some fluctuation over the years, the average harvest has remained relatively stable since 1983 (Wells 2021).

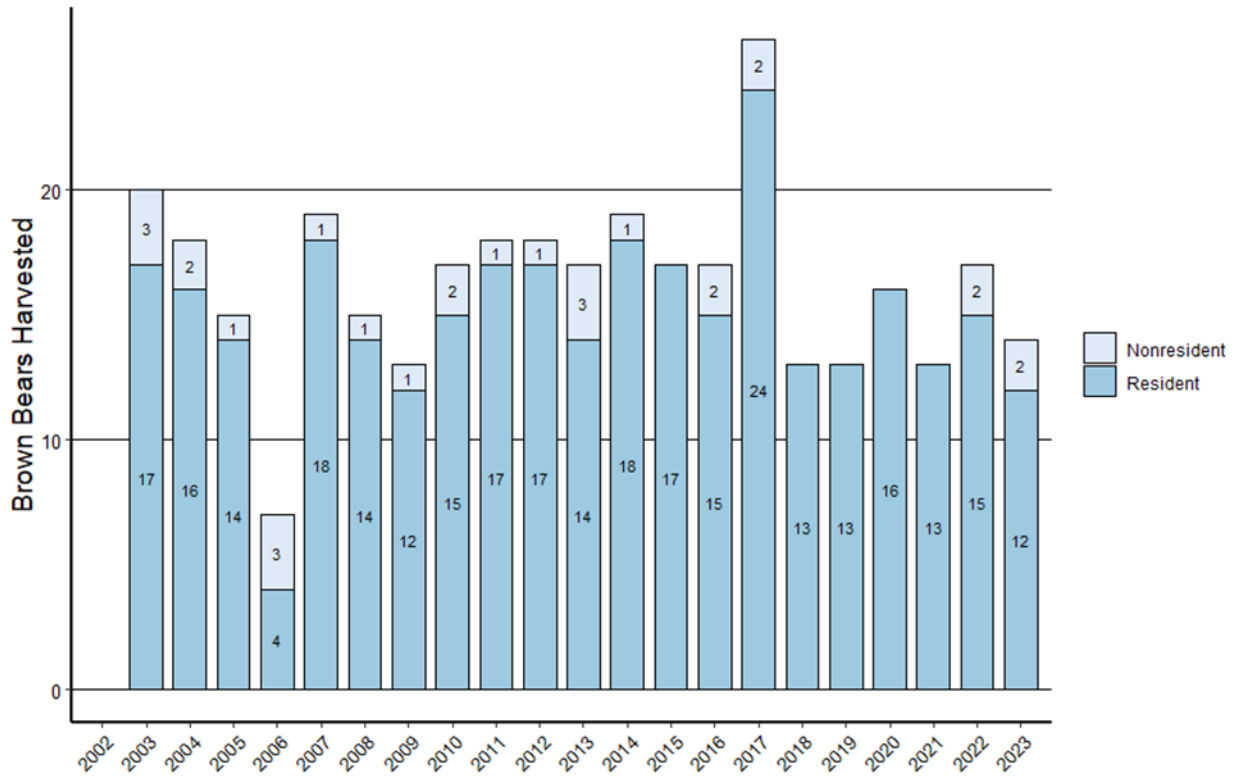


Figure 1. Brown bear harvest 2002-2023 Unit 20E (Hunter 2025 pers. comm.).

Discussion and Effects

If adopted, this proposal would increase the brown bear harvest limit in Unit 20E to two bears, providing additional opportunity 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 have been able to harvest two brown bears in Unit 20E under State regulations since 2004 and harvest pressure is very low.

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 WP26-72b

Justification

This proposal increases harvest opportunity for federally qualified subsistence users and there are no conservation concerns as current harvest levels are very low and Alaska residents may already harvest two bears on all Federal public lands in Unit 20E under State regulations.

LITERATURE CITED

Alaska Board of Game. 2024. Transcripts of Alaska Board of Game proceedings. March 19, 2024. Pike's Waterfront Lodge, Fairbanks, AK.

ADF&G. 2025. Operational Plan for Intensive Management of Moose in Game Management Units 12, 20D and 20E During Regulatory Years 2024-2029. Alaska Department of Fish and Game, Species Management Report and Plan, Juneau, AK.

Miller, S. D., White, G. C., Sellers, R. A., Reynolds, H. V., Schoen, J. W., Titus, K., Barnes, V. G., Smith, R. B., Nelson, R. R., Ballard, W. B., & Schwartz, C. C. (1997). Brown and Black Bear Density Estimation in Alaska Using Radiotelemetry and Replicated Mark-Resight Techniques. *Wildlife Monographs*, 133, 3–55.
<http://www.jstor.org/stable/3830833>

Hunter, A. 2025. Wildlife biologist. Personal communication: email. ADF&G. Tok, AK.

Wells, J. J. 2021. Brown bear management report and plan, Game Management Units 12 and 20E: 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-2021-28, Juneau.

SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Eastern Interior Alaska Subsistence Regional Advisory Council

The Council voted to **support** WP26-72b, which they submitted. The Council has no conservation concerns about overharvest because most Federal lands in Unit 20E are within Yukon-Charley National Preserve and only accessible by the Yukon River, resulting in low harvest pressure on brown bears. Most brown bear harvest occurs opportunistically during the fall moose season. State regulations already allow a 2-bear harvest limit so this proposal would align regulations and reduce regulatory complexity. It may encourage people to harvest more brown bears, which might help moose calf survival. However, the Council was concerned about the lack of bear population data 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.

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