

## WP26–52 Executive Summary

<b>General Description</b>	Wildlife Proposal WP26-52 requests to align the harvest limit and season length for brown bear in Unit 22 with State regulations. <i>Submitted by the Alaska Department of Fish and Game.</i>
<b>Proposed Regulation</b>	<p><b>Unit 22—Brown bear</b></p> <p><i>Units 22A, south of and including the Golsovia River drainage 22D remainder, and 22E—1 2 bears by State registration permit only</i> Aug. 1-May 31.</p> <p><i>Units 22A remainder, 22B, 22D, 22E—2 bears by State registration permit</i> Aug. 1-May 31 June 30</p> <p><i>Unit 22C—1 bear by State registration permit only</i> Aug. 1-Oct. 31. Apr. 1-May 31. June 30</p> <p><i>Unit 22D, that portion west of the Tisuk River drainage, west of the west bank of the unnamed creek originating at the Unit boundary opposite the headwaters of McAdam's Creek and west of the west bank of Canyon Creek to its confluence with Tuksuk Channel—2 bears by Federal registration permit</i> July 1-June 30.</p>
<b>OSM Preliminary Conclusion</b>	<b>Support Proposal WP26-52</b>
<b>Seward Peninsula Subsistence Regional Advisory Council Recommendation</b>	
<b>Interagency Staff Committee Comments</b>	
<b>ADF&amp;G Comments</b>	

**WP26–52 Executive Summary**

<b>Written Public Comments</b>	<b>None.</b>
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## **Draft Wildlife Analysis WP26-52**

### **ISSUE**

Wildlife Proposal WP26-52, submitted by the Alaska Department of Fish and Game (ADF&G), requests to align the harvest limit and season length for brown bear in Unit 22 with State regulations. Specifically, this proposal requests extending the season by 30 days to close June 30 in Units 22A remainder, 22B, 22C, 22D, and 22E; increasing the harvest limit in Units 22A, 22B, 22D, and 22E to two bears; and eliminating the Federal permit requirement in Unit 22D, that portion west of the Tisuk River drainage, west of the west bank of the unnamed creek originating at the unit boundary opposite the headwaters to McAdam Creek and west of the west bank of Canyon Creek to its confluence with Tuksuk Channel (Unit 22D SW).

### **PROPONENT STATEMENT**

The proponent states these changes are necessary to bring consistency between Federal and State regulations, reducing user and confusion. The proponent also states that little to no harvest occurs under the RB699 State registration permit for brown bear in Unit 22.

### **Current Federal Regulations**

#### **Unit 22—Brown Bear**

<i>Units 22A, 22D remainder, and 22E—1 bear by State registration permit only</i>	<i>Aug. 1-May 31.</i>
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<i>Unit 22B—2 bears by State registration permit</i>	<i>Aug. 1-May 31.</i>
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<i>Unit 22C—1 bear by State registration permit only</i>	<i>Aug. 1-Oct. 31. Apr. 1-May 31.</i>
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<i>Unit 22D, that portion west of the Tisuk River drainage, west of the west bank of the unnamed creek originating at the Unit boundary opposite the headwaters of McAdam Creek and west of the west bank of Canyon Creek to its confluence with Tuksuk Channel—2 bears by Federal registration permit</i>	<i>July 1-June 30.</i>
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### **Proposed Federal Regulations**

## Unit 22—Brown bear

*Units 22A, south of and including the Golsovia River drainage 22D remainder, and 22E—1 2 bears by State registration permit only* Aug. 1-May 31.

*Units 22A remainder, 22B, 22D, 22E—2 bears by State registration permit* Aug. 1-May 31  
**June 30**

*Unit 22C—1 bear by State registration permit only* Aug. 1-Oct. 31.  
*Apr. 1-May 31.*  
**June 30**

*Unit 22D, that portion west of the Tisuk River drainage, west of the west bank of the unnamed creek originating at the Unit boundary opposite the headwaters of McAdam's Creek and west of the west bank of Canyon Creek to its confluence with Tuksuk Channel—2 bears by Federal registration permit* ~~July 1-June 30.~~

## Current State Regulations

### Unit 22—Brown/Grizzly Bear

*Unit 22A, south of Residents: Two bears every regulatory year Aug 1- and including the May 31 Golsovia River Non-residents: One bear every regulatory year drainage*

*Unit 22A Residents: Two bears every regulatory year Aug 1- remainder June 15 Non-residents: One bear every regulatory year*

*Unit 22B Residents: Two bears every regulatory year Aug 1- June 30*

*Non-residents: One bear every regulatory year by DB685 Aug 1- permit June 15*

Unit 22C	Residents: One bear every regulatory year by permit available online at <a href="http://hunt.alaska.gov">Http://hunt.alaska.gov</a> or at license vendors in Unit 22 beginning July 1. Harvest quota to be announced. Season will be closed by emergency order when quota is reached.	RB670	Aug 1- June 30
	Non-residents: One bear every regulatory year by permit.	DB685	Aug 1- Oct 31
			Apr 1- June 15
Unit 22D, 22E	Residents: Two bears every regulatory year		Aug 1- June 30
	Non-residents: One bear every regulatory year by permit	DB690	Aug 1- June 15

*In addition to other regulations, subsistence regulations apply to the following “Residents Only” hunts.*

Unit 22A, south of and including the Golsovia River drainage	Two bears every regulatory year by permit available in Nome beginning July 1	RB699	Aug 1– May 31
Unit 22A remainder, 22B, 22D, 22E	Two bears every regulatory year by permit available in Nome beginning July 1	RB699	Aug 1– June 30
Unit 22C	One bear every regulatory year by permit available in Nome beginning July 1	RB699	Aug 1– June 30

### **Extent of Federal Public Lands**

Unit 22 is comprised of approximately 44% Federal public lands that consist of 29% Bureau of Land Management (BLM), 12% National Park Service (NPS) and 3% U.S. Fish and Wildlife Service (USFWS) managed lands.

## Customary and Traditional Use Determination

Rural residents of Unit 22 have a customary and traditional use determination for Brown bear in Unit 22.

## Regulatory History

In the 1990s the Alaska Board of Game (BOG) started incrementally liberalizing brown bear harvest regulations in Unit 22 in response to an increase in brown bear abundance. Federal regulations for brown bear in Unit 22 were liberalized at the same time but have remained largely unchanged since 1998. State subsistence and Federal harvest limits (except in Unit 22C) for brown bear in Unit 22 increased from one bear every four regulatory years in 1990 to one bear by State registration permit in 1999.

In 2002, the Board adopted WP02-33 as modified by the Seward Peninsula Subsistence Regional Advisory Council (Council). The proposal asked to eliminate sub-unit distinctions which were set to prevent over-harvest in Units 22A and 22B where brown bears were not common and for a unit-wide season from Aug 1–May 31, with a harvest limit of one brown bear by State registration permit. The modification was to open a Federal hunt in Unit 22C, aligning Federal regulations with recently adopted State regulations, which opened a State hunt in Unit 22C. The Unit 22C brown bear season was Aug. 1-Oct. 31 and May 10-25. This modified proposal was adopted as the Board indicated the low expected amount of Federal harvest would not create a conservation concern and all federally qualified subsistence users could already harvest brown bear under State regulations.

In 2011, the BOG adopted Proposal 24 as amended, aligning the State sport brown bear season in Unit 22C with the remainder of the unit. The BOG amendment was to lengthen the spring season, from May 10–25 to May 1–31, while retaining the current fall season, upon recommendation by ADF&G. The season recommendation for Unit 22C was to try and concentrate spring harvest in the subunit during muskox calving season (ADF&G 2011).

In 2014, the BOG adopted Proposal 16 as amended, which modified the State sport season and harvest limit for brown bear in Unit 22. This proposal requested to change the harvest limit from one bear every four years to one bear per year and to extend the spring season from May 1–May 31 to Apr 1–May 31. The BOG adopted this proposal with the understanding that harvest may increase, but the abundance of brown bear in the area would support the increase. The amendment was to change the harvest limit to one brown bear per year for both residents and non-residents.

In 2016, the Board adopted WP16-44 as modified by the Office of Subsistence Management (OSM), which requested to lengthen the brown bear season in Unit 22C and create a new hunt area in Unit 22D, *that portion west of the Tisuk River drainage, west of the west bank of the unnamed creek originating at the unit boundary opposite the headwaters of McAdam Creek and west of the west bank of Canyon Creek to its confluence with Tuksuk Channel* (Unit 22D SW). The season modification was not adopted due to the lack of Federal public lands in Unit 22C. The new hunt created in Unit 22D SW had a year-round season with a harvest limit of 2 brown bears by Federal registration permit. This

change was adopted because there were no conservation concerns from the minimal increase in harvest this proposal would allow.

In 2017, the BOG adopted Proposal 30, which lengthened the subsistence brown bear season in Unit 22C by 30 days to open April 1, and Proposal 31 as amended, which increased the resident brown bear sport harvest limit in Unit 22B to two bears, increasing opportunity.

In 2018, the Board adopted Proposal WP18-39, which increased the brown bear harvest limit in Unit 22B to two bears and Proposal WP18-40, which extended the brown bear season in Unit 22C by 30 days. These proposals aligned with 2017 changes to State regulations. The Board believed increases in harvest would be minimal and the population of brown bear could withstand additional harvest. ADF&G concurred with adopting both proposals as they aligned Federal and State regulations.

In 2020, the BOG adopted Proposal 39 to extend the brown bear sport season and increase the harvest limit in Units 22D and 22E. This proposal extended both resident and non-resident sport seasons from Aug 1–May 31 to Aug 1–June 15 and increased the resident harvest limit to 2 bears per year. They also adopted Proposal 41 as amended, which extended both the sport and subsistence season dates in Units 22B and 22C. The new closing date for these hunts was June 30 for residents and June 15 for non-residents. The amendment to this proposal was to require a State registration permit in Unit 22C for residents.

In 2024, the BOG adopted Proposal 27, extending the resident sport and subsistence brown bear season in Units 22C, 22D and 22E to close June 30. In Unit 22C the season extension eliminated the spring and fall seasons, combining and extending them to Aug. 1–June 30. This extension aligned season dates in these units with the season in Unit 22B, reducing regulatory confusion. The BOG decided since very little harvest occurred from November to March that this change would have little impact on brown bear abundance.

### **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**

The Unit 22 brown bear population has likely fluctuated throughout the past century due to hunting pressure and predator control programs. Starting about 1950, hunting pressure was reduced, and

seasons were quite restrictive in effort to increase brown bear abundance. Moose moved in and muskoxen were transplanted into Unit 22 in the 1960s and 1970s, respectively and salmon runs rebounded beginning in the 2000s, which increased prey sources for brown bear. This led to an increase of brown bear abundance, which in turn led to incrementally liberalized hunting regulations in Unit 22 starting in 1998. It is currently believed brown bear numbers have increased above the numbers estimated in the 1970s. Higher amounts of harvest in the unit has not appeared to affect brown bear abundance (Germain 2022).

Brown bears are difficult to survey precisely due to their solitary nature and their sensitivity to disturbance, as is evident from the lack of current population data. Aerial surveys are conducted in Unit 22 to estimate abundance and density of brown bears; however, they are done infrequently enough to require population reconstruction methods from sealing data to estimate abundance (Germain 2022).

State management goals for brown bear in Unit 22 are to provide for an optimum harvest of brown bears and to “maintain a population that sustains a 3-year mean annual reported harvest of at least 50% males.” State management objectives for Unit 22 include monitoring the brown bear harvest through field observations, analysis of sealing data, and interviews with hunters; and aging of harvested bears (Germain 2022).

In 1991, the extrapolated brown bear population estimate in Unit 22 west of the Darby Mountains was 458 independent bears, with density estimates of 15 independent and 29 total bears/1000km<sup>2</sup>. In 2015, a second brown bear survey was completed in an expanded survey area in the central portion of Unit 22, resulting in a population estimate for the survey area of 420 independent brown bears (713 total bears) and density estimates of 21 independent and 36 total bears/1000 km<sup>2</sup> (Germain 2022; Schmidt et. al. 2021). In May 2021, the NPS and ADF&G completed an aerial survey of the Seward Peninsula, covering most of Units 22B, 22C, 22D, and 22E. The results of this survey estimated 527 adult brown bears and 521 cubs within the Seward Peninsula survey area (NPS 2021).

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

Brown bears are not commonly used for subsistence on the Seward Peninsula (ADF&G 2025, Table 1), although they were more important in the past, particularly before moose arrived in the area, and during times of scarcity (Loon and Georgette 1989, Georgette 2001). Table 1 shows that during years in which Seward Peninsula communities were surveyed by ADF&G Division of Subsistence between 1980 and 2017, an average of 0-3% of surveyed households harvested bears, and an average of 0-6% of surveyed households used brown bears.

Stories about the origin of brown bears in the region hold that they are related to humans (Georgette 2001). Traditional Iñupiaq rules dictate that brown bears must be spoken about and treated respectfully (Loon and Georgette 1989, Georgette 2001). Brown bear hunting is a specialized activity. Before the arrival of firearms, residents of Northwest Alaska hunted brown bears with spears and arrows (Loon and Georgette 1989). Bears were often hunted in their dens (Georgette 2001). Bear hides, bones, teeth, and claws were traditionally used to make spearheads, fishhooks, rope, snowshoe bindings, dog harnesses, scraping tools, doors, mattresses, ruffs, and mukluks. Narrow bones of the bear foreleg were



used for spearheads and snares, while knee joints were made into scraping tools. Bear hides were used as mattresses and as doors for sod houses (Loon and Georgette 1989).

In 1987 to 1988 Loon and Georgette conducted an ethnographic study of brown bear use by residents of select communities in Northwest Alaska. Although the work focused on the Kotzebue Sound region, Shaktoolik, Unalakleet, White Mountain, and Nome were also included in the study (Loon and Georgette 1989). The research focused on use of brown bears over the previous ten years, although observations on earlier uses of bears were also included. Loon and Georgette (1989) found that coastal communities rarely ate brown bears unless they were harvested in an interior area where bears feed on fish and berries. Coastal bears are often considered unpalatable due to their tendency to consume marine mammal carcasses along the beaches (Loon and Georgette 1989).

Among the four Unit 22 communities included in Loon and Georgette's (1989) study, only White Mountain was found to be consuming bear meat regularly in the 1980s. In addition, although Loon and Georgette did not conduct interviews in Golovin, they drew on internal ADF&G information to show that residents of that community were also using brown bears for food (Loon and Georgette 1989). Those interviewed in Shaktoolik and Unalakleet identified brown bears as a nuisance species that was rarely harvested for food (Loon and Georgette 1989). However, in 2004, Division of Subsistence estimated that a total of five bears were harvested in Unalakleet (ADF&G 2025). In Nome, interviewees reported that people avoided eating brown bears due to concern about trichinosis (Loon and Georgette 1989). Residents of White Mountain, Unalakleet, and Shaktoolik all reported that brown bears had become more abundant in the region over time (Loon and Georgette 1989).

In 1998, Georgette conducted ethnographic research on traditional knowledge and use of brown bears by residents of Shishmaref and Deering (Georgette 2001). Elders interviewed in both communities stated that brown bears had not been as common in the region when they were growing up in the 1920s to the 1960s. They attributed the increasing abundance of bears to reduced hunting, forest fires pushing them into the area, and the return of caribou to the region (Georgette 2001). In the Unit 22 community of Shishmaref, no active brown bear hunters were identified, and hunters were more interested in polar bears. One respondent explained that because seals and their oil are easily accessible in Shishmaref, residents do not need bear fat like inland peoples that lack seals (Georgette 2001). A Shishmaref Elder interviewed by Georgette indicated that some people avoided eating bears because of traditional stories in which humans and bears are related (2001). However, some residents remembered their parents or grandparents eating brown bears or recalled eating them in their childhood (Georgette 2001). Some interviewees expressed interest in trying to hunt for brown bears, given their increased abundance (Georgette 2001).

**Table 1.** Four measures of brown bear use by Seward Peninsula communities between 1980 and 2017. The table shows averages for all the years in which each community was surveyed. Nome has never been surveyed for its subsistence use of brown bears (ADF&G 2025).

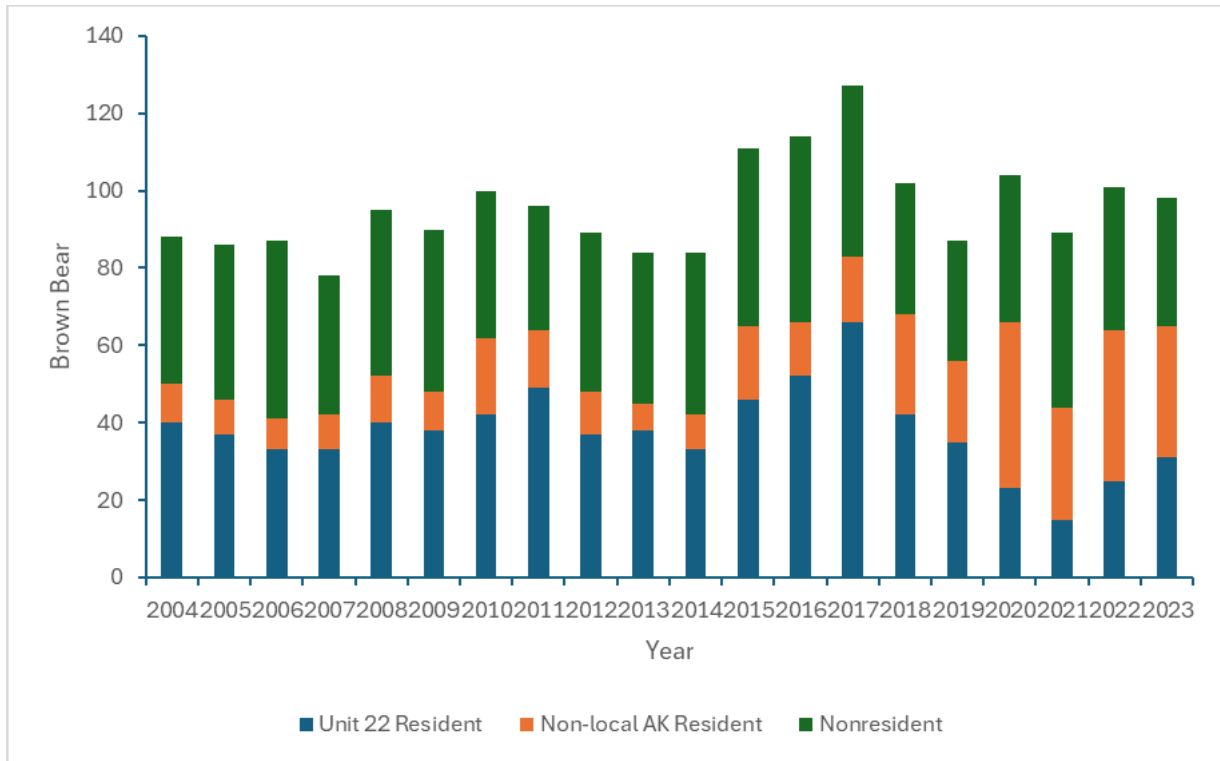
Community	Percentage of Surveyed Households Using Brown Bears	Percentage of Surveyed Households Harvesting Brown Bears	Estimated Number of Brown Bears Harvested	Number of Pounds Harvested Per Person
Brevig Mission	1%	1%	0	0.0
Elim	3%	1%	1	0.4
Golovin	6%	3%	1	0.7
Koyuk	0%	0%	0	0.1
Saint Michael	0%	0%	0	0.0
Shaktoolik	1%	1%	0	0.1
Shishmaref	1%	1%	1	0.1
Stebbins	1%	1%	1	0.2
Teller	4%	2%	1	0.3
Unalakleet	1%	1%	3	0.3
Wales	0%	0%	0	0.0
White Mountain	2%	1%	1	0.3

## Harvest History

The 3 road systems in Unit 22 collectively amount to 400 miles in length and allow for easy access to brown bear habitat. The long seasons and 2 bear harvest limits allow for hunters to pursue brown bears nearly year-round, especially along the road system. Harvest has historically occurred at sustainable levels, even with the liberalization of State harvest regulations. During the last reporting period (2014–2019) over 60% of the harvest were male bears, successfully meeting one of the management goals (Germain 2022).

Harvest of brown bear in Unit 22 has remained fairly constant from 2004–2023, averaging 96 bears/year (**Figure 2**). Local resident harvest has decreased since 2017, averaging 29 bears/year; whereas from 2004–2017 local harvest averaged 42 bears/year. Non-local resident harvest has increased recently, averaging 32 bears/year from 2017–2023; while 2004–2016 non-local resident harvest averaged 12 bears/year. Non-resident harvest has remained steady from 2004–2023, averaging 40 bear/year (Carson 2025, pers. comm.).

Under Federal regulations, harvest of brown bear in Unit 22D SW requires a registration permit (FB22012). There is no record of this permit being issued or used since the mid-1990s. The State subsistence brown bear permit (RB699) has been issued sporadically over the last 20 years. It has only been issued a total of 68 times since 2005, with only two successful reported harvests. The last time it was issued was in 2018 (**Table 1**) (Carson 2025, pers. comm.). State subsistence hunts require the meat to be salvaged, but do not require sealing unless the hide and/or skull are removed from the unit.



**Figure 2.** Brown bear harvest in Unit 22 from 2004–2023 (Carson 2025, pers. comm.).

**Table 2.** RB699 utilization for brown bear harvest in Unit 22 from 2005–2024 (Carson 2025, pers. comm.).

Regulatory Year	Permits Issued	RB699 Harvest
2005	7	0
2006	4	0
2007	5	0
2008	14	0
2009	9	0
2010	4	0
2011	3	1
2012	1	0
2013	5	0
2014	5	1
2015	0	0
2016	2	0
2017	8	0
2018	1	0
2019	0	0
2020	0	0
2021	0	0

2022	0	0
2023	0	0
2024	0	0
Total	68	2

### **Alternative(s) Considered**

One alternative to consider would be to eliminate the requirement of a State permit to harvest brown bear. Requiring a State permit would be an extra administrative burden on federally qualified subsistence users. Since 2005 there has been little or no reported harvest under the State subsistence permit and it has not even been issued since 2018. General State resident harvest of brown bear occurs without a permit in all subunits except for Unit 22C. So anyone harvesting outside of Unit 22C under State regulations does not need to acquire a permit.

### **Discussion and Effects**

If this proposal is adopted, Federal brown bear regulations in Unit 22 will be aligned with the State subsistence regulations, and harvest limits and season lengths will increase. Specifically, the season length in Units 22A remainder, 22B, 22C, 22D, and 22E would be extended by 30 days to close June 30, and the harvest limit in Units 22A, 22B, 22D, and 22E would increase to two bears. Both Federal and State regulations will require one registration permit (RB699) for harvesting brown bear, which will simplify reporting of subsistence harvests. This proposal would also increase opportunity for federally qualified subsistence users to harvest a brown bear under Federal regulations, except in Unit 22D SW where bears could no longer be harvested in July.

No impacts to the brown bear population are expected from adopting this proposal. Subsistence users currently do not harvest brown bears late in spring and summer because the quality of the meat and hide are both poor. Very little harvest occurs under either Federal or State subsistence regulations, with only 2 bears reported harvested under RB699 in the past 20 years. The vast majority of harvest occurs under State sport regulations and reported harvest has continued to meet the management objective of greater than 50% males. Additionally, federally qualified subsistence users may already harvest brown bear on Federal public lands in Unit 22 under the currently more liberal State regulations.

Adopting this proposal would reduce 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.”

### **OSM PRELIMINARY CONCLUSION**

**Support Proposal WP26-52.**

## **Justification**

Extending season lengths and increasing harvest limits will allow for more opportunity for federally qualified subsistence users to harvest brown bear in Unit 22 under Federal regulations. There are no conservation concerns as users may already harvest brown bears under the currently more liberal State regulations, subsistence harvest pressure (RB699) is extremely low, and this proposal simply aligns Federal and State regulations.

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