| WP26-73 Executive Summary | |
|---|---|
| **General Description** | Wildlife Proposal WP26-73 requests increasing the harvest limit for brown bear in Unit 25B to two bears. *Submitted by: Eastern Interior Alaska Subsistence Regional Advisory Council* |
| **Proposed Regulation** | **Unit 25B—Brown Bear**<br><br>*Units 25A ~~and 25B~~—1 bear* *Aug. 10-June 30.*<br><br>***Unit 25B— 2 bears*** ***Aug. 10-June 30.*** |
| **OSM Preliminary Conclusion** | **Support** |
| **Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation** | |
| **Interagency Staff Committee Comments** | |
| **ADF&G Comments** | |
| **Written Public Comments** | **None** |

# Draft Wildlife Analysis
# WP26-73

## ISSUE

Wildlife Proposal WP26-73, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council (Council), requests increasing the harvest limit for brown bear in Unit 25B to two bears.

## Proponent Statement

The proponent states that this would provide additional opportunity for federally qualified subsistence users. There are no conservation concerns for brown bear in Unit 25B, and it is one of the least inhabited areas of the state.

## Current Federal Regulations

**Unit 25B—Brown Bear**

| | |
|---|---|
| *Units 25A and 25B—1 bear* | *Aug. 10-June 30.* |

## Proposed Federal Regulations

**Unit 25B—Brown Bear**

| | |
|---|---|
| *Unit~~s~~ 25A ~~and 25B~~—1 bear* | *Aug. 10-June 30.* |
| ***Unit 25B— 2 bears*** | ***Aug. 10-June 30.*** |

## Current State Regulations

**Unit 25B−Brown Bear**

| | | |
|---|---|---|
| *Units 25A and 25B* | *Residents and Nonresidents—1 bear every regulatory year* | *July 25-June 30* |

**Extent of Federal Public Lands**

Unit 25B is comprised of approximately 81% Federal public lands that consist of 38% Bureau of Land Management (BLM) managed lands, 35% U.S. Fish and Wildlife Service (USFWS) managed lands and 8% National Park Service (NPS) managed lands

**Customary and Traditional Use Determination**

Residents of Unit 25 and Eagle have a customary and traditional use determination (C&T) for brown bear in Unit 25, remainder, which includes Unit 25B.

**Regulatory History**

There was no Federal hunt for brown bears in Unit 25 until 1999 because there was 'no subsistence priority' when Federal regulations were adopted from State regulations in 1990. In 1999, the Federal Subsistence Board (Board) adopted Proposals WP99-57 and WP99-58 to open a year-round brown bear season with a 1 bear harvest limit in Unit 25D due to adequate abundance and expected low harvest levels. In 2001, the Board adopted Proposal WP01-36a, which established the current C&T for brown bear in Unit 25, remainder. The "remainder" is all of Unit 25 except Subunit 25D. The Board also adopted Proposal WP01-36b to open a Sept. 1-May 31 brown bear season with a 1 bear harvest limit in Unit 25, remainder. Brown bear abundance was determined to be adequate; anticipated harvest was expected to be minimal; and harvest quotas were not being met under the State regulations.

State regulations have had a brown bear hunt in Unit 25B since before the inception of the Federal Subsistence program in 1990. Under the State regulations, harvest limits were one brown bear every four regulatory years until regulatory year 2004/05 for Unit 25B. The State harvest limit increased to one brown bear every regulatory year in 2004 for Unit 25B with a season of Aug. 10-June 30.

In 2004, the Board adopted Proposal WP04-77, extending the brown bear season in Units 25A and 25B to Aug. 10-June 30, aligning with the State season at that time. Federal regulations for brown bear in Unit 25B have not changed since.

In 2017, the State brown bear season for Units 25A, 25B, and 25C was lengthened to July 25- June 30.

**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 widely distributed in northeastern Alaska. The brown bear population for Unit 25 declined in the 1960s primarily from aircraft-supported hunting associated with guiding. As a result, regulations were implemented to limit harvest starting in 1971. As the population recovered, regulations were gradually liberalized. Population trend data for brown bears in Unit 25 are currently very sparse; however, there is a possibility that the population has increased or expanded into new habitat because local residents on the Yukon River reported seeing more brown bears recently compared to years prior to 2000 (Lenart 2021).

The population estimate of brown bears in Units 25A, 25B, and 25D is based on extrapolated, outdated estimates and represents a "best guess". The 2014-2018 estimated brown bear population in Units 25B and 25D combined was 580 brown bears (7.5-9.3 bears/1,000 $km^2$) (Lenart 2021).

In northern Alaska, brown bears occur on the edge of their range in low productivity ecosystems. Here, brown bears have been found to den, on average, 206 days, longer than other population in the world (Deacy et al.2025). Due to the low productivity environment, brown bears are smaller, occur at lower densities, produce fewer offspring, and females are older when they first reproduce (Reynolds 1987, Hilerbrand et al. 2019, Hilderbrand et al. 2019). The delay in reproduction, as well as small litter sizes, long intervals between successful reproductive events, and short potential reproductive periods lead to the low rates of successful production in brown bears in northern Alaska (USFWS 1982). In addition, female brown bears exhibit high fidelity to home ranges and little emigration or immigration (Reynolds 1993). Therefore, brown bears are often managed conservatively.

**Harvest History**

Harvest tickets are not required to hunt brown bears in Unit 25B, although all harvested bears are required to be sealed. The ADF&G management objective in Units 25A, 25B, and 26C is to manage for a 3-year mean annual human-caused brown bear mortality of ≤8% of brown bears ≥2-years old, of which no more than 45% in each unit are female. In Units 25B and 25D combined, manage for a 3-year mean annual human-caused brown bear mortality of ≤47 bears ≥2-years old of which no more than 21 are female. The harvestable surpluses for Units 25B and 25D are based on the conservative assumption that 8% of the total population can be harvested on a sustainable basis. Prohibition on the take of cubs and sows with cubs mostly protects the female portion of the population. ADF&G relies on monitoring harvest as an index to sustainability (Lenart 2021).

Based on reported harvest, brown bear management objectives have generally been met in Unit 25 (Lenart 2021, Young 2007). During RY14–RY18, the total reported harvest was below the estimated allowable harvest for each unit and harvest was < 45% female for most years (**Table 1**, Lenart 2021).

In Units 25B and 25D, most human-caused brown bear mortality is likely not reported. During RY14–RY18, 4–12 brown bears were reported harvested and one brown bear was killed as a defense of life and property (DLP) (**Table 1**, Lenart 2021). From RY16-RY18, the 3-year annual mean human-caused mortality was 5 bears, including an average of one female annually. Although most bears harvested were not reported during this time period, the management objectives were likely met as actual harvest was most likely < 47 bears (Lenart 2021).

From 2010-2018, the vast majority of successful brown bear harvests in Units 25B and 25D were by nonlocal residents, ranging from 2-9 bears/year. Only two local residents, defined as residents of Units 25B and 25D, reported harvesting a brown bear in 2013. All other years between 2010 and 2018, local resident reported harvest was zero (Lenart 2021).

During RY14-RY18, 83% of the 119 reported brown bears harvests from Units 25A, 25B, and 25D occurred in August and September with 14% occurring in the spring (Lenart 2021).

**Table 1.** Reported brown bear human-caused mortality in Units 25B and 25D. Mortality includes sealing data and nonhunting kills. However, there was only 1 reported nonhunting kill during this time period (Lenart 2021).

| Regulatory Year | Male | Female | Total | % Females in Harvest |
|---|---|---|---|---|
| 2014-2015 | 7 | 6 | 13 | 46 |
| 2015-2016 | 2 | 2 | 4 | 50 |
| 2016-2017 | 3 | 1 | 4 | 25 |
| 2017-2018 | 4 | 1 | 5 | 20 |
| 2018-2019 | 5 | 2 | 7 | 26 |

**Other Alternative Considered**

One alternative considered was to extend the Unit 25A and 25B brown bear season to open July 25 to align with the State season opening date. Currently, the Federal brown bear season in Units 25A and 25B is shorter than the State season. However, this alternative is outside the scope of the proposal.

**Discussion and Effects**

If adopted, this proposal would provide greater opportunity for hunting brown bears in Unit 25B for federally qualified subsistence users. No conservation concerns, impacts on the brown bear population, or substantial increases in harvest are expected given the very low harvest pressure (especially by local residents) in this very remote area. This proposal would increase regulatory complexity by further misaligning State and Federal regulations.

## OSM PRELIMINARY CONCLUSION

**Support** Proposal WP26-73

### Justification

Adopting this proposal increases opportunity for federally qualified subsistence users and there are no conservation concerns due to extremely low harvest pressure in this remote area. Current harvest rates in Unit 25B are below States management objectives for Unit 25B, and increasing the Federal harvest limit from one bear to two bears in Unit 25B is not expected to increase harvest rates above sustainable levels.

## LITERATURE CITED


Deacy, W., M. S. Sorum, M. D. Cameron, G. V. Hilderbrand, D. D. Gustine, and K. Joly. 2025. Denning chronology in an Arctic brown bear population. Wildlife Biology e01420.

Hilderbrand, G. V., D. D. Gustine, K. Joly, B. Mangipane, W. Leacock, M. D. Cameron, M. S. Sorum, L. S. Mangipane, and J. A. Erlenbach. 2019. Influence of maternal body size, condition, and age on recruitment of four brown bear populations. *Ursus* 29(2): 111-118.

Hilderbrand, G. V., K. Joly, M. S. Sorum, M. D. Cameron, and D. D. Gustine. 2019. Brown bear (*Ursus arctos*) body size, condition, and productivity in the Arctic, 1977-2016. *Polar Biology*:1-6.

Lenart, E. A. 2021. Brown bear management report and plan, Game Management Units 25A, 25B, 25D, 26B, and 26C: 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-2021-17, Juneau.

Reynolds, H.V. 1987. The brown/grizzly bear Ursus arctos horribilis, pages 41-42 in J. Rennicke, C. Schwartz, H.V. Reynolds and S.C. Amstrup. Bears of Alaska in life and legend. AK. Nat. Hist. Assn. 63 pp.

Reynolds, H.V. 1993. Evaluation of the effects of harvest on grizzly bear population dynamics in the northcentral Alaska range. ADF&G. Federal Aid in Wildlife Restoration. Research Final Report. Grant W-23-5.

Young, D. D., Jr. 2007. Units 20A, 20B, 20C, 20F, and 25C brown bear. Pages 212-228 in P. Harper, editor. Brown bear management report of survey and inventory activities 1 July 2004-30 June 2006. Alaska Department of Fish and Game. Project 4.0. Juneau, Alaska, USA.