

LAKE CLARK NATIONAL PARK
SUBSISTENCE RESOURCE COMMISSION
1 Park Place
Port Alsworth, AK 99653

December 8, 2025

Ms. Nanci Morris Lyon, Chair
Bristol Bay Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503

Dear Ms. Morris Lyon,

The Lake Clark National Park Subsistence Resource Commission (SRC) met on September 27, 2025. The SRC reviewed the federal subsistence wildlife proposals for the Lake Clark area that are being considered for the 2026-2028 regulatory cycle and would like to provide comments for the following proposals:

WP26-36: Shorten wolverine hunting season in Unit 9:

The Lake Clark National Park Subsistence Resource Commission supports WP26-36. Although some members of the Lake Clark SRC expressed concern about shortening a hunting season, SRC members were unanimous in their support of aligning state and federal seasons as well as supporting the wishes of the Bristol Bay Regional Advisory Council (BBRAC).

WP26-37: Remove firearms restrictions for beaver trapping in Unit 9 and Unit 17:

The Lake Clark National Park Subsistence Resource Commission supports WP26-37. SRC members expressed the view that there is an abundance of beavers in these two game management units and the SRC supports aligning state and federal regulations.

WP26-38: Increase harvest limit for brown bears and eliminate state registration permit requirement in Unit 17, and WP26-39: Extend brown bear season to year-round in Unit 17:

The Lake Clark National Park Subsistence Resource Commission voted to take no action on either of these proposals, but the members do have several comments that we would like to share with you. SRC members had serious concerns about increasing the harvest limit to two brown bears. In recent years the state has undertaken intensive predator management in Unit 17 and there is limited information available about how this has impacted the brown bear population in the region. No current population counts have been conducted. During the last three years, the State has gunned down almost 200 brown bears in Unit 17. Bears range long distances. In a 2014-2018 study by Lake Clark National Park Service biologists, bears tagged within the park and preserve moved many miles: west beyond the Mulchatna River, south to Iliamna Lake, and north past the Stony River. Most of the 40 or more tagged bears did not remain within the park and preserve. Bears are a slow-reproducing species and the impact of the combination of predator control, the higher harvest limit on state-regulated lands, plus a higher limit on federal subsistence lands could have negative impacts on the overall population. SRC members are generally supportive of extending the brown bear season to year-round to match the state season and were neutral on the idea of removing the state registration permit requirement.

Thank you for the opportunity to comment.

Sincerely,

/s/ C. Warren Hill

C. Warren Hill, Chair
Lake Clark National Park Subsistence Resource Commission

cc: NPS Alaska Regional Director
Superintendent, Lake Clark National Park and Preserve

Chair: C. Warren Hill.; Members: Tim Anelon, Ned Fowler, Tinny Hedlund, Steve Kahn, Karla Jensen, Billy Trefon Jr.