PROPOSAL 19

5 AAC 85.060. Hunting seasons and bag limits for fur animals.

Establish a hunting season and nonresident bag limit for Arctic fox on the Pribilof Islands in Unit 10 as follows:

Establish a hunting season and nonresident bag limit for Arctic fox on the Pribilof Islands in Unit 10. Establishing a hunting season will prevent Pribilof foxes from being hunted during their breeding season. The rationale behind suggesting a bag limit only for nonresidents is to avoid undue hardship for residents living on the Pribilof Islands who may seek to harvest foxes as a means of livelihood. (The majority of nonresident hunters to the Pribilofs are believed to be from out of state.)

Suggested draft regulatory language:

Hunting Regulations – Fur Animals Arctic fox: Unit 10, <u>Pribilof Islands located in a portion of Unit 10,</u> <u>RESIDENT HUNTERS: No Limit, open season Nov 10 – Feb 28 [NO CLOSED SEASON].</u>

NONRESIDENT HUNTERS: Two foxes [NO LIMIT], **open season Nov 10 – Feb 28** [NO CLOSED SEASON].

This establishes an open season that does not overlap the fox breeding season, and is similar to the two fox bag limit for Arctic fox hunting in other units.

What is the issue you would like the board to address and why?

Unit 10 includes the Pribilof Islands in the Bering Sea, in addition to the western and central Aleutian Islands from Attu Island to Unimak Island.

The Alaska Department of Fish and Game (2015) identifies the Arctic fox, Vulpes lagopus, as a Stewardship Species, a Sentinel Species, and a Species of Greatest Conservation Need (SGCN). Arctic fox on the Pribilof Islands, i.e., Pribilof foxes, are further recognized as an endemic subspecies, Vulpes lagopus pribilofensis (Angerbjörn et al. 2004; Norén et al. 2023) and are the islands' only terrestrial carnivore. There are no red fox (V. vulpes) on the Pribilof Islands.

Foxes (arctic and red) were historically introduced onto many Aleutian Islands (Bailey 1993) in Unit 10. Subsequently, introduced foxes have been successfully eradicated from many Aleutian Islands in Unit 10 through a USFWS removal program (Bailey 1993; Petersen et al. 2015). Possibly influenced by this history of past introductions and eradications of foxes on Aleutian Islands, the Alaska Hunting Regulations (2023-2024, and previous years) stipulate "No Limit" and "No Closed Season" for Arctic fox hunting throughout Unit 10.

Because the Pribilof Islands are designated as being in Unit 10, Pribilof foxes may be legally hunted with no bag limit and no closed season.

Why is this an issue?

On the Pribilof Islands, the lack of bag limits on the hunting of Arctic foxes could result in unsustainable levels of harvest. In particular, having "No Closed Season" allows for Pribilof foxes to be hunted throughout their breeding season. [In addition to hunting, the trapping of Arctic fox is permitted throughout Unit 10, including the Pribilofs, with "No Limit" during the open season.]

Pribilof foxes are part of the Pribilof Islands' native faunal and floral biodiversity (Elliott 1881). Pribilof foxes provide unique photo-tourism viewing opportunities, and serve as a first-line of defense against introduced rodents, i.e., rats, becoming established on the Pribilof Islands.

Pribilof fox populations appear to be in decline (Fig.1)(White 1992, 2017) as a result of reductions in natural food sources e.g., northern fur seals, nesting sea birds. Other factors, including decreasing sea ice (Geffen et al. 2007), exposure to organochlorine contaminants (Bolton et al. 2017), and disease (White 2010; Spraker and White 2016) may be further contributing to the observed decline in Pribilof fox numbers.

Compared to historic population estimates of >250 breeding pairs on each of St. Paul and St. George Islands (Jones 1914; Isto 2012), Pribilof foxes currently exist in low numbers. A standardized island-wide survey last conducted in July 2023 on St. Paul documented a total of 57 active dens, 34 of which appeared to be natal (although pups were observed at only 26 dens).

What would happen if nothing is changed?

Unlimited hunting, especially during the fox breeding season, is likely to be detrimental to the long-term conservation and survival of endemic Pribilof foxes. As small, genetically-isolated populations, Pribilof foxes are vulnerable to a myriad of natural and anthropogenic threats, as noted above. A combination of factors, including climate change, and future and emergent threats such as increasing risk of disease e.g., avian flu, could drive Pribilof foxes towards extinction.

In the short-term, unlimited harvest reduces opportunities for tourism viewing, and reduces the fox populations' capacity to prevent introduced rodents from becoming established on the Pribilof Islands.

The local St. Paul Island Ecosystem Conservation Office (ECO) informally oversees resident hunting. However, an unknown number of nonresidents who travel to the Pribilof Islands specifically to hunt (primarily sea ducks and reindeer) also harvest Pribilof foxes. The lack of available data on nonresident fox harvest, and the current regulations that allow for "No Closed Season" and "No Limit" on Arctic fox hunting throughout Unit 10, hampers ECO's ability to effectively monitor or conserve the Pribilof Island's natural resources.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? This proposal was presented to the St. Paul Island Ecosystem Conservation Office (ECO) and the St. Paul Tribal Council. While there are concerns about the lack of monitoring of visiting hunters who harvest local wildlife (Pribilof foxes, sea ducks), overall, the Tribal Council was not in consensus as to whether the proposed changes would address concerns about fox conservation without interfering with local activities e.g., fox hunting, control of "nuisance" animals in town.

The Tribal Council supports the concept of ECO establishing a local monitoring program of all on-island hunting to obtain harvest data that can help inform local conservation programs, similar

to ECO's established and successful reindeer hunt monitoring program. However, in the absence of both a monitoring program and any local enforcement authority, the Tribal Council expressed doubt as to how the proposed regulatory changes could be reasonably enforced.

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