

PROPOSAL 20

5 AAC 84.270. Furbearer trapping.

Establish a nonresident bag limit on Arctic fox trapping on the Pribilof Islands in Unit 10 as follows:

Establish a nonresident bag limit on Arctic fox trapping on the Pribilof Islands in Unit 10. 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 Arctic foxes as a means of livelihood.

There already exists an open season for Arctic fox trapping throughout Unit 10. There are no changes proposed to the existing open season dates. There are no changes proposed for bag limits on resident trapping.

Suggested draft regulatory language:

Trapping Regulations – Central/Southwest Alaska, Units 9-11, 13, 14A, 14B, 16, and 17

Arctic fox: Unit 10, **Pribilof Islands located in a portion of Unit 10**

RESIDENT TRAPPERS: Nov 10 – Feb 28..... No Limit.

NONRESIDENT TRAPPERS: Nov 10 – Feb 28..... **Two foxes** [NO LIMIT].

What is the issue you would like the board to address and why? Establish a nonresident bag limit on Arctic fox trapping on the Pribilof Islands which are located in a portion of Unit 10 as follows:

NONRESIDENT TRAPPERS: BAG LIMIT 2 FOXES

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 Trapping Regulations (2023-2024, and previous years) stipulate “No Limit” for Arctic fox trapping during the open season (Nov 10 – Feb 29) throughout Unit 10.

Because the Pribilof Islands are designated as being in Unit 10, Pribilof foxes may be legally

trapped (including shot) with no bag limit during the open season.

Why is this an issue?

On the Pribilof Islands, the lack of bag limits on the trapping of Arctic foxes could result in unsustainable levels of harvest. [In addition to trapping, the hunting of Arctic fox is currently permitted throughout Unit 10, including the Pribilofs, with “No Limit” and “No Closed 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 43 active dens, 26 of which were confirmed as natal (one or more surviving pups present).

What would happen if nothing is changed?

Unlimited trapping 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 trapping. However, an unknown number of nonresidents who travel to the Pribilof Islands specifically to hunt (primarily sea ducks and reindeer) also ‘trap’ Pribilof foxes (legally by shooting). The lack of data on nonresident fox harvest, and current regulations that allow for “No Limit” on Arctic fox trapping throughout Unit 10, hampers ECO’s ability to monitor or effectively 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), including visitors who may legally shoot foxes under a trapping license, 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., local fox trapping. [The proposed changes do not apply to resident trappers.]

The Tribal Council supports the concept of ECO establishing a local monitoring program of all on-island hunting/trapping 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.

(See references provided in corresponding proposal to establish a hunting season and nonresident bag limit.)

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