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Comments to the Alaska Board of Game February 14, 2007
Inre: Spring 2007 Proposals

Proposal 30 – 5 AAC. 85.020.
Hunting seasons and bag limits for brown bears

SUPPORT

Alaska Backcountry Hunters and Anglers are in support of this proposal as presented by the Department. With the growing number of negative bear/human interactions on the Kenai Peninsula, this proposal serves both to satisfy the public's desire for an opportunity to hunt brown bear in an area that is relatively accessible, and to allow the Department to focus hunting in areas that are identified as having populations of bears that are likely to be involved in "problem" behavior.

As the total bear harvest would still be limited by current guidelines, the possibility of overharvest of the population is addressed. When funds can be obtained to provide an adequate bear-density estimate of brown bears on the Kenai, a method will already be in place should a harvest of a greater number of bears become possible.

Proposal 35 – 5 AAC 92.132.
Hunting seasons and bag limits for brown bears;
and 5 AAC 92.990. Definitions

Support

We support this proposal as presented by the Kodiak Unified Brown Bear Subcommittee. The regulation of "wounding" a bear and having it count against your tag is already in place in other units of the state. While this regulation would likely not be enforceable among non-guided hunters,

having this “wounding” law in place would allow guides to enforce this statute among their clients, and would promote the necessity among all hunters (guided and unguided) to take reasonable, ethical, clear shots to avoid wounding losses, and also to concentrate on the tracking and pursuing of any wounded bears rather than quickly giving up and simply going after another bear.

Many bears that are wounded now by the heavy caliber rifle rounds hunters use, and not found, more than likely die and these “harvests” are unaccounted for and make it difficult for biologists to accurately assess real harvest numbers.

By instituting this “wounding” regulation, area biologists will be able to more realistically assess harvest numbers, and hunters will likely not take “risky” shots if they know that if they wound a bear it will count as a harvested bear on their tag.

Proposal 43, 44, 45, 46, 47, 48 – 5 AAC 92.510.

Areas closed to hunting

SUPPORT

All of the above proposals ask to reinstate the hunting closure for brown bears in “that portion of Unit 9 extending south and east of McNeil River State Game Sanctuary to the boundary of Katmai National Park and Preserve, and including any state land within the boundaries of Katmai National Park and Preserve” that is set to expire on July 1, 2007.

Issue: in 2005, the Alaska Board of Game, amidst much controversy, voted 5-2 to open this small area to a limited amount of bear hunting beginning in July of 2007. Mike Fleagle, then chair of the BOG, was one of the Board members who voted against opening this area to brown bear hunting, saying that doing so was “going to anger a lot of people for very little benefit.” Alaska Backcountry Hunters and Anglers agree completely with that statement.

Since the Board decision of 2005, numerous polls have been taken among hunters, and the latest shows that 78% of Alaskan hunters **oppose** opening this area to brown bear hunting. Many Advisory Committees, comprised

mostly of hunters and anglers, oppose the opening, as well as the association that represents Alaskan guides.

The likely reasoning the Board will hear in support of allowing this area to be opened for limited brown bear hunting, as planned, is that these bears are not habituated to humans when not within the McNeil bear-viewing area, and moreover that hunters should not allow another precedent to be set whereby we create yet another “buffer zone” around an area to please “non-hunters.”

The issue of “buffer zones” is one that greatly concerns Alaska Backcountry Hunters and Anglers. We do not want to see more areas adjacent to our Parks and Preserves locked up to the outdoor pursuits our members cherish and enjoy.

However, the bears that move within this small area between McNeil and Katmai are among the most “famous” bears in the entire world, and their numbers have recently been declining, either because of harvest in other areas, or because of declines in salmon runs at the Falls. The long-standing popularity and publicity of the McNeil bear-viewing area and these particular bears, and the economic stimulus it provides to Alaska is wholly unique, and thus demands special consideration.

We sincerely request that the Board adopt the above proposals to reinstate the closure of brown bear hunting in the Kamishak Special Use Areas.

Proposal 70 – 5AAC 92.115
Control of predation by bears

Oppose

According to the Conclusions and Recommendations of the ADFG 2005 Brown Bear Management report for Unit 16 (available online at http://www.wildlife.alaska.gov/pubs/techpubs/mgt_rpts/05brbweb.pdf), area biologists “believe that management objectives are being met. The harvest objective was below the desired 3-year average of 28 females older than 2 years, but at the same time the **harvest was at record levels** [my emphasis]. By liberalizing the spring season and eliminating the resident tag fee in Unit

16B, the Board of Game has increased the likelihood of additional harvests to reach the desired objectives.”

According to the above management report quote, there is no need to implement a predation control program for brown bears in Unit 16, as this proposal asks for.

Furthermore, without the funding for an accurate bear-hair-snag density estimate for Unit 16 bears, we don't have the required scientific baseline data to implement a bear predation control program of this magnitude. When the population estimate of brown bears in Unit 16 varies from “681- 1254 bears,” it is obvious that we don't have the required confidence intervals to accurately assess bear densities with any reasonable certainty. Bear hair-snag density estimates have been done in other Units and have proven to be an accurate and effective tool for determining bear densities. According to the 2005 Brown Bear Management report, “The department must continue to closely monitor harvest, particularly age and sex of bears, in order to identify and hopefully avoid any serious declines in the population [of brown bears].”

If this bear predation control program is instituted, it is highly likely that we will skew the sex-age composition of all bear populations and put at risk the recovery of bear populations from a control program of this magnitude.

Alaska Backcountry Hunters and Anglers asks that the Board closely read and evaluate ADFG's bear management reports for Unit 16 and give weight to the recommendations of the area biologists, which would seem to negate the need for this bear predation control program.

We strongly oppose Proposal 70.

Proposal 158 – 5 AAC 85.055(a)
Hunting seasons and bag limits for Dall Sheep

Oppose

We must oppose this proposal because it removes a general open season hunting opportunity from Alaska residents before it attempts to restrict non-

resident hunters, by turning these two subunits into a draw-only hunt for both residents and non-residents.

While we agree with the Department that moving toward an “any ram” hunt would likely benefit the genetics of the sheep population over the long term, we feel that before residents are restricted to a draw-only hunt that we should first limit the amount of non-resident hunting opportunities available in this area.

We recognize that some limits will have to be imposed in the future in order to protect the overharvest of sheep in these areas. However, we recommend that the Board either look into limiting the seasonal dates that non-resident hunters can hunt in these units (for example, restrict the non-resident season to two weeks later in the season, providing a shorter overall non-resident season and allowing residents “first crack” at the hunting opportunity), or imposing a draw on non-residents only.

Resident Alaskan hunters feel that they should be allowed more hunting opportunity than non-resident hunters in Units where any restrictions are in place. There is some long-standing conflict here because non-resident hunters provide the bulk of ADFG Wildlife Conservation funding via license and tag fees, so the very system in place essentially gives some preference to non-resident hunters. In future, if Alaska does not put a cap on the amount of non-resident sheep hunters eligible (by percentage) to hunt in draw-only areas, conflicts will continue to arise between resident hunters, guides, and non-resident hunters.

There are no easy answers here. We believe the main management objective should be to protect the sheep population in these areas from overharvest at all costs. However, before we restrict resident Alaska hunters, we would like the Board to first consider some limits on non-resident hunters.

We wish to thank the entire Board of Game for allowing us to comment on these proposals, and for their dedication and service to the State of Alaska and our system of wildlife management and hunting and trapping opportunities.

Sincerely,

Dave Lyon – Co-chair Alaska Backcountry Hunters and Anglers

Mark Richards – Co-chair Alaska Backcountry Hunters and Anglers