



November 13, 2018

An Agenda Change Request (ACR 9) has been submitted by Jason Johnston to the Alaska Board of Game requesting to change 5 AAC 85.020(a)(8) Hunting seasons and bag limit for brown bear. The proponent is asking the board to return fall season dates to September 20 to October 21 and spring season dates to May 10–31 for Unit 9B.

With respect to the board's Agenda Change Request (ACR) acceptance criteria (5 AAC 92.005):

- A. The department is not aware of an error in regulation.
- B. In terms of an unforeseen effect of a regulation, at the February 2018 Southcentral Board meeting, the board received a request to reduce bear harvest in Unit 9E, after discussions with the department the board concluded that the harvest reduction should occur in a broader area. The board also received other proposals for Unit 9 bears. Ultimately, the board amended Proposal 132 which addressed all of Unit 9, to include the reduction in bear harvest. Reducing bear harvest in Unit 9B is unnecessary. Fall and spring season lengths in Unit 9B went from Sept 20–Oct 21 to Oct 7–21 and May 10–31 to May 10–25. The early portion of the season (Sep 20 – Oct 7) provided the majority of fall hunting opportunity and harvest: as a result of adopting the proposal as amended, the majority of the fall hunting opportunity and harvest was lost in Unit 9B. A harvestable surplus in Unit 9B will be lost in the future if the Unit 9B season remains reduced.
- C. The department does not believe that there is a biological concern that is caused by existing regulations.
- D. The department is unaware of any unforeseen or unexpected events that would otherwise restrict or reduce a reasonable opportunity for customary and traditional wildlife uses as defined in AS 16.05.258(f). There is a positive customary and traditional use finding for brown bears in Unit 9B, and an amount reasonably necessary for subsistence of 10–20 bears,
- E. Delayed regulatory action would result in a harvestable surplus in Unit 9B being lost in the future. The primary bear seasons in Unit 9 are biennial which would exacerbate the lost harvest.

Unit 9 bear seasons are biennial occurring during spring of even years and fall of odd years. The Board changed season dates to Oct 7–21 and May 10–25 at the department's recommendation for Units 9C, D, and E at the February 2018 meeting in Dillingham. There is also a subsistence hunt, RB502 in Units 9B and 9E, available to resident hunters, and a near-village hunt, RB525, in Unit 9 open year-round to residents.

Unit 9B has had earlier and more liberal seasons for decades.

There was extensive discussion of bear harvest in Unit 9 at the February 2018 meeting, primarily over concern of overharvest in Units 9C-E.

The next regularly scheduled board meeting for Unit 9 regulations is during winter/spring of 2020/2021. If the board accepts this ACR, the department recommends the proposal come before the board at its March 2019 meeting in Anchorage to allow for more public input.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Dale", with a stylized flourish at the end.

Bruce Dale
Director
Division of Wildlife Conservation