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May 27, 2020

Alaska Board of Game  
ATTN: Chairman Ted Spraker  
[Electronic Transmission]

Re: June 3rd, 2020 Special Meeting- Spring Bear Hunts

Dear Board of Game,

The Alaska Professional Hunters Association (APHA) is appreciative and thankful for board generated *Proposals 1 & 2*. In a letter dated March 25th, APHA requested regulatory certainty as health mandates, particularly mandatory quarantine for out of state travelers, went into place to protect the public from COVID-19. To our relief the Alaska Board of Game worked with the department to provide the hunting guides clarity. Unfortunately the only solution was to close non-resident bear seasons until June 1st. APHA also requested consideration from the Board of Game and ADFG as to how lost opportunity could be re-gained, yet avoid any conservation issues with changing bear harvest patterns. APHA is grateful for the consideration given to our request, we see the solutions offered in proposals 1 & 2 as being mostly workable for both resident and non-resident hunters. APHA supports Prop. 1 as written while requesting amendments to Prop. 2.

### **Proposal 1- SUPPORT**

#### **Background:**

Guided bear hunting in GMU 9 offers an unparalleled experience for resident and non-resident hunters to pursue large brown bears in what is largely an unspoiled wilderness setting. Bear hunting on the Alaska Peninsula is world famous for its abundant bears, its weather and the beauty of the volcanic landscape sandwiched between the very different Pacific Ocean and Bering Sea coastlines. Brown bear management in GMU 9 has incorporated alternating seasons (spring-even year, fall-odd years) since the middle of the 1970s. This management strategy is highly conservative and unique to GMU 9, all of the other GMUs populated by brown bears offer hunting opportunity every spring and fall. Unique but effective alternating spring and fall seasons in GMU 9 have resulted in a conservatively managed, sustainable harvest.

#### **Conservation Concerns:**

APHA supports Prop. 1 based on the ADFG's comments stating that the deferral of 2020 spring hunting is conservation neutral. The following excerpt from department comments on Prop 1. sums up the likely impacts of passing the proposal:

*"Because of long lives and low adult mortality, bear populations are intrinsically slow to change and, as a result, bears are amassed with our current biennial seasons. Adult males that are not harvested this spring will be older and larger next regulatory year."*

#### **Hunter's Perspective:**

Resident hunters can easily plan a brown bear hunt in GMU 9 because tags are available over the counter. While it is easy to obtain tags to hunt in GMU 9 it remains a difficult and expensive part of the state to access. With the decline in population in rural communities and limited transportation options in the region resident hunters must plan ahead to secure safe and reliable transportation to the field if they are relying on a commercial service for transport. Resident hunters who own their own transportation still must navigate difficult weather to access the vast wilderness making up GMU 9. Resident hunters are not restricted or capped in their use but must be able to plan ahead to secure transportation or be willing to adapt to difficult weather during the hunting season to access hunting themselves. Many resident hunters who rely on commercial transporters had to cancel their hunting plans due to in-state travel bans and quarantine requirements (state and local communities).

Non-resident hunters are required to hire a guide or hunt with a resident relative within the second degree of kindred. Guided hunters

make up the bulk of non-resident use in GMU 9. Guided bear hunts are valuable, ranging in value from \$20-30,000 dollars. In addition to the hunt cost, non-resident hunters must purchase valuable tags, take vacation time and pay for other services such as lodging and taxidermy. Non-resident hunters usually book hunts lasting 10 days in duration but are advised to expect travel delays caused by weather. Traveling to Alaska to hunt brown bears in GMU 9 represents a serious commitment in time and money for a non-resident hunter. Non-resident hunting seasons for all bears were closed in GMU 9 for the 2020 hunting season.

APHA supports Prop. 1 because it is the best solution for both resident and non-resident hunters who were planning on hunting GMU 9 in the spring of 2020. Passage of Prop. 1 will give resident hunters ample time to secure transportation to the field for spring of 2021 and make the necessary time in their work schedule. Residents who planned on hunting in spring of 2020 will not have to wait until spring of 2022 if Prop 1. is passed. Non-residents hiring guides have expressed near unanimous support for moving the spring 2020 season to 2021 because it will allow them time to plan their trip to Alaska but offer the least disruption work responsibilities. Feedback to APHA members from their hunters booked in 2020 indicated a very low rate of hunt cancelation and refunds if there will be a spring hunt in 2021. Prop 1. will benefit the hunter whether they are resident or non-resident.

#### **Guide Perspective:**

Hunting guides operating in GMU 9 offer some of the premier bear hunting experiences in the world. Because of this, many guides are booked out a season or two in advance. If Prop. 1 does not pass the problems for the guides in the area will be twofold. First, guides will have to confront the need to refund deposits and hunt fees for clients that did not get a hunt and do not have an alternative. Second, guides will be forced to bump clients already booked to make room for clients willing to defer their trip to spring 2022. Failure to pass Prop. 1 will cause a cascading, negative effect to small guide businesses beyond the immediate effects of losing revenue in 2020. Passing Prop. 1 will lessen damages to guide businesses from an emergency closure not related to the health of the bear resource. Passing Prop. 1 is good for guide businesses and resident and non-resident hunters.

### **Proposal 2: SUPPORT- AMMEND UNIT 8**

#### **Background (excluding Unit 8):**

*Proposal 2* offers to allow both resident and non-resident hunters who were successful in applying for a spring bear hunt to return at a later date and use their tag. APHA supports this solution to the emergency closure of non-resident seasons and the effective closure of resident seasons where residents had to travel outside of their community while health mandates prohibiting intrastate travel were in place. APHA supports passage of Prop. 2 as written with an amendment that will specifically address GMU 8.

#### **Conservation Concerns (excluding Unit 8):**

APHA agrees with the Department that passage of Prop. 2 will not result in any conservation concerns. Merely shifting un-utilized opportunity to another year is benign and will not result in any overharvest as the proposal moves spring hunts to future springs so harvest patterns will not be changed.

#### **Hunter's Perspective (excluding Unit 8):**

Drawing a hunt oftentimes requires overcoming difficult odds and then planning your life around utilizing a difficult opportunity to secure. Hunters, resident and non-resident alike, who draw hunts have an expectation of being able to utilize their tag. By deferring the use of the drawing tag to the next year the hunter is made whole and the expectation of making use of their coveted drawing tag is satisfied.

#### **GMU 8 Amendment**

- 2021 Winter Drawing for both resident and non-resident hunters proceeds as normal.
- 2020 Unit 8 Resident and Non-resident Spring Brown Bear permit winners, who did not pick up their bear permit in Spring of 2020, are given 3 spring seasons to use their permit. (2021, 2022, 2023)
- No more than 3 of the 2020 permit holders will be allowed to hunt per spring season, in each drawing hunt area.
- The 3 slots will be awarded on a first come, first served basis. The slots will be reserved by contacting the Kodiak ADF&G Office, no later than October 1st of the preceding year.
- Crowding is not a concern, because no more than 3 additional hunters per hunt are will be allowed per year. It is unlikely that these 3 additional hunters will hunt during the same time period.

#### **Conservation:**

Kodiak Island bear hunting is held on a pedestal worldwide as an example of successful management. Lost spring hunt opportunities in 2020 were offered inline with sustained yield principles. Bear managers on Kodiak utilize population and harvest models that ensure sustainability. APHA is confident that passage of our amendment can be incorporated into manager's models and that overharvest and crowding will not result. Any overharvest concerns managers have can be addressed by adjusting drawing opportunities downward after 2020 permit winners have declared their intention to hunt the following spring.

Department comments on Prop. 1 are relevant to our offered amendment:

*"Because of long lives and low adult mortality, bear populations are intrinsically slow to change and, as a result, bears are amassed*

*with our current biennial seasons. Adult males that are not harvested this spring will be older and larger next regulatory year.”*

Bears are long lived and bears that are not harvested on Kodiak in spring 2020 will mostly persist and be available for harvest in the future. Kodiak’s bear management plan does not contemplate a year with virtually zero harvest. Passing APHA’s proposed amendment will maintain consistency with harvest objectives set out in the bear management plan by partially accounting for lost harvest in 2020.

## **Hunter Perspective-**

### **Resident Hunters:**

Resident hunters must overcome difficult drawing odds to secure a Kodiak brown bear tag. Resident hunts are delayed a year to give hunters ample opportunity to organize vacation time to make use of their tags. APHA supports this delayed strategy to provide maximum opportunity for residents to utilize their tags. By allowing 2020 resident hunters to use their tags in the following three years maximum participation will be achieved thus making resident drawing hunt winners whole and providing for maximum opportunity.

### **Non-resident Hunters:**

Kodiak Island is famous internationally and attracts hunters from around the world. Moving all of 2020 tags to spring 2021 could cause scheduling issues for international hunters who require more time to plan their trip to Alaska. There is also the risk that international travel bans will still be in place in spring of 2021 thus precluding some hunters from taking advantage moving all of the tags to 2021. American Non-resident hunters must similarly plan their trip to Alaska. While there are less impediments for American hunters to travel to Kodiak to hunt, additional flexibility in their ability to use their 2020 tag will benefit the hunter booked on a valuable Kodiak hunt

### **Guide Perspective:**

Hunting guides on Kodiak Island operate with strict quotas while offering highly coveted hunt opportunities. Guides on Kodiak are often times booked out in advance many have reservation agreements with clients for the spring of 2021 currently. Guides would like to recapture some of the lost opportunity from 2020 but have expressed caution as to how that opportunity is “added back” due to crowding issues. Guides on Kodiak would benefit from working with their 2020 clients and adding them back into their hunts over the next three years in a way that will not result in crowding or degradation of quality hunting experience. APHA’s amendment will allow for that flexibility by tapping into guide experience in the areas they hunt and preventing crowding concerns.

### **Cost Analysis:**

ADFG comments indicate a cost of approximately \$30,000 if Prop. 2 is passed. Incorporating APHA’s amendment for GMU 8 will more than compensate for ADFG’s projected costs. By allowing spring 2020 Kodiak hunters to use their tags over the next 3 years ADFG will not miss a drawing hunt period for Unit 8. Because drawing hunt application fees are captured by the department and available for Pittman Robertson match ADFG will more than make up for the costs associated with the passage of Prop. 2.



# ALASKA WILDLIFE ALLIANCE

May 27, 2020

## **RE: Special Meeting Regarding Spring Bear Hunts – Proposal 1 (5 AAC 85.020. Seasons and bag limits for brown bear) Comments**

Dear Alaska Board of Game Members,

I am providing these comments on behalf of Alaska Wildlife Alliance and our membership. We hope Board members consider our comments regarding Proposal 1 prior to making a decision at the June 3 special meeting.

Alaska Wildlife Alliance (AWA) was founded by Alaskans in 1978 to advocate for ecosystem-based wildlife management in the state. AWA not against hunting – we have hundreds of hunters in our membership and several on our Board. We believe that the principles of ethical hunting and fair chase not only honor hunting traditions, but also the wildlife we aim to protect. We do not support management decisions that jeopardize Alaska’s wildlife populations and ecosystems, especially for the sole purpose of providing economic benefits to a single user group. **We have grave concerns that adding an extra hunting season for GMU 9 brown bears and authorizing three hunting seasons in a row will unnecessarily and detrimentally affect the brown bear population in GMU 9, and urge the Board to not approve Proposal 1 (5 AAC 85.020. Seasons and bag limits for brown bear).**

The comments we provide below are based on the understanding that the Board of Game’s decision-making process regarding Proposal 1 should:

- 1) Be based on the conservation and development of game resources,
- 2) Reflect Alaska’s diverse users of wildlife, and
- 3) Not be for the purposes, whether stated or implied, of providing economic opportunities to a specific user group.

As such, we have organized our comments and concerns about Proposal 1 into categories under those three tenets.

### **1) The Board of Game’s Decisions Should Be Based on the Conservation and Development of Game Resources**

**The Board of Game was created for the conservation and development of game resources.** [Alaska Statute 16.05.221](#) states: “(b) For purposes of the *conservation and development of the game*



*resources* of the state, there is created a Board of Game composed of seven members appointed by the governor, subject to confirmation by a majority of the members of the legislature in joint session..." (emphasis added)

- During the 2018 Board of Game meeting in Anchorage during the discussion about proposal 132 (changing duration of fall and spring seasons for brown bear biennial hunts in GMU 9), then **Board Member Teresa Sager Albaugh stated "It's great that we are dealing with conservation. That's our first responsibility with these bears..."**<sup>1</sup>. We applauded Teresa's 2018 assessment of the Board's responsibility and hope the current Board's decision-making process regarding Proposal 1 discussed on June 3, 2020 echoes that sentiment and places due value on the Board's role in conservation of the GMU 9 brown bear population.

### **Alternating seasons were implemented in the 1970s for a reason - known overharvest.**

- Hunting of brown bears in GMU 9 occurs in the spring and fall, but in alternating years (spring hunting season in even years; fall hunting season in odd years). This alternating cycle of hunting seasons has been in effect in GMU 9 since 1976 because having **two hunting seasons each year was resulting in overharvest** and wasn't sustainable for the bear population.
- There have been no instances in almost 45 years in which multiple hunting seasons per year were authorized because the bear population has not been robust enough to support multiple seasons per year. **There are no data to support that the situation has changed** and that adding a spring 2021 season would not result in overharvest.
- Just two years ago at the Board of Game meeting, during a discussion by the Board of whether or not to add a resident only early season hunt in GMU 9, **Alaska Department of Fish & Game's (ADF&G) bear biologist for GMU 9 said the brown bear population could not sustain an additional level of harvest, even the comparatively low level of harvest by residents** (which is only about 25% of the total annual harvest of brown bears in GMU 9)<sup>2</sup>.
- ADF&G's comments on Proposal 1 only provide information about the spring season, but **an accurate assessment of impacts of an additional hunt must look at the full picture**. For example, in fall 2019, when the season was reduced to 2-weeks instead of the normal 3-weeks, a total of 192 bears were killed – 30 more bears than during the longer fall 2017 season; a 15% increase. This means **hunting pressure on these bears has already increased, even without an extra spring hunting season**. If this trend continues 3 consecutive hunting seasons in a row, with more bears taken each season, could result in serious conservation concerns and overharvest.

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<sup>1</sup> February 23, 2018 Board of Game meeting audio recording at time stamp 1:38:49 ([http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/swf/2017-2018/20180216\\_febcsw/index.html?mediaBasePath=/Meeting%2002-23-18%20BOG%20%28Feb-27-18%2010-22-03%20AM%29#](http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/swf/2017-2018/20180216_febcsw/index.html?mediaBasePath=/Meeting%2002-23-18%20BOG%20%28Feb-27-18%2010-22-03%20AM%29#))

<sup>2</sup> Refer to ADF&G's presentation slides #57 and #58, given at the November 2018 Board of Game meeting (<http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2017-2018/csw/tab6.2.pdf>)



**The true status of brown bears is unknown and decisions are based on grossly outdated and inadequate data.**

- ADF&G’s bear biologist for GMU 9 has recently expressed concerns to the Board of Game that the **population of brown bears in GMU 9 has been declining since the 2000s**, and from 2013-2017, he received numerous reports from area scientists, long-term guides, and the public asking **“Where’s the bears?”** because they weren’t seeing them like they used to.<sup>3</sup>
  - We asked ADF&G the following question: **“What is the annual rate of decline over the past 20-year and 10-year time frames?”** Understanding population trends is imperative to making good management decisions, and knowing this information in 10-year horizons is standard practice in wildlife management.
    - We were shocked when on May 26, 2020 they responded: **“Unknown.** Bear populations fluctuate like other wildlife populations, but are difficult and very expensive to monitor like we do for ungulate populations.”
- Surprisingly, **ADF&G has not surveyed the population of brown bears in GMU 9 for 15-30+ years, depending upon subunit.**
  - We asked ADF&G the following question: “Regarding the statement that the Unit 9 bears have experienced a long-term decline, where can I find reports of recent abundance and trends? If there are no reports, would you please provide me the raw abundance data since 2000, when the decline was believed to have started.” ADF&G responded via email on May 26, 2020 with the following:
    - “Becker 1999–2000, (draft only) northern Unit 9B including Lake Clark NP&P: 645 bears, 49.5 bears/1,000 km<sup>2</sup>. Survey results from Unit 9B are being reanalyzed right now with an improved statistical technique (point independence MRDS). Becker believes these previous estimates were biased low.
    - Results from 2002 survey in Unit 9D, southern Alaska Peninsula (Becker and Crowley in prep.): 1,683 bears, density of 195 bears/1,000 km<sup>2</sup> and an annual harvest rate of 4.35%. This was a conservative harvest rate during a period of peak harvest in Unit 9D.
    - Results from 2004–2005 Unit 9C including Katmai NP&P reanalyzed by Becker (2018 internal report): 1,951 bears, 108.8 bears/1,000 km<sup>2</sup>, and annual harvest rate of 1.21–1.82% based on 2004–2005 harvest. Harvest rate is very low because most of Unit 9C is Park refugia closed to hunting.
    - Results from extrapolations of Sellers and Miller 1991 (Black Lake study): Unit 9A: 296 bears, 213 bears/1,000 km<sup>2</sup>; Unit 9E: 3,176 bears, 103 bears/1,000 km<sup>2</sup>. These extrapolations have a history of being biased low.

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<sup>3</sup> Refer to ADF&G’s presentation slides #48 and #57, given at the February 23, 2018 Board of Game meeting (<http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2017-2018/csw/tab6.2.pdf>); audio recording for that meeting day is available at: February 23, 2018 Board of Game meeting audio recording at time stamp 1:38:49 ([http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/swf/2017-2018/20180216\\_febcsw/index.html?mediaBasePath=/Meeting%202-23-18%20BOG%20%28Feb-27-18%2010-22-03%20AM%29#](http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/swf/2017-2018/20180216_febcsw/index.html?mediaBasePath=/Meeting%202-23-18%20BOG%20%28Feb-27-18%2010-22-03%20AM%29#))



- To summarize abundance, Northern Unit 9B: 645 bears, Unit 9D: 1,683, Unit 9C: 1,951 bears, southern Unit 9B: unknown, Unit 9A 296 bears: Unit 9E: 3,176 bears. This totals 7,751 bears.”
- **To recap just how old and out-of-date the data are:**
  - Unit 9A was last surveyed prior to 1991
  - Unit 9B was last surveyed prior to 1999
  - Unit 9C was last surveyed in 2005
  - Unit 9D was last surveyed in 2002
  - Unit 9E was last surveyed prior to 1991
  - The most recent survey was 15 years ago, and for three of the subunits there haven’t been any surveys this century.
- **ADF&G has no plans to conduct any abundance surveys in the foreseeable future** (per email from ADF&G dated May 26, 2020). This is concerning for several reasons and means the **management decisions about how many bears can be harvested are not based on scientific studies** of the wild population, but rather are based on the numbers of hunters who report killing a bear.
  - In an email dated May 26, 2020, ADF&G noted “...we don’t manage on a unit-wide basis nor on these extrapolations, but rather on harvest statistics over time.”
  - There is circular logic in making management decisions on how many bears to kill based on how many bears were killed.
- **Since ADF&G has no plans to survey the population, they won’t be able to know until it’s too late if too many bears were killed as a result of three concurrent hunting seasons in a row for the population to maintain long-term viability.** This strategy is inconsistent with the purpose of the Board of Game being for conservation and development of game resources. Not knowing how many bears there really are, and continuing to assume increased levels of harvest is acceptable, is in fact the opposite of conservation and jeopardizes future viability of the population (and future hunting opportunities).
- ADF&G continues to claim there are “up to 8,000 bears” in GMU 9 based on extrapolations from data collected from prior to 1991 through 2005, despite some of their other reports suggesting the estimate is too high.
  - Since the data upon which the 8,000 bears estimate is so old and out-of-date, **it can no longer be deemed a reliable estimate of the number of brown bears in GMU 9**, especially when ADF&G indicates the population has been declining since the 2000s.
  - Management decisions that result in removing animals from a population should not be based on the maximum estimate of animals in the population, but rather should be based on the minimum number of animals in the population. That way you don’t remove too many animals from the population, and don’t risk jeopardizing the sustainability of the population. This is especially true when basing harvest levels on outdated and imcomplete data.
- ADF&G reported during the February 23, 2018 Board of Game meeting that **an entire cohort (age class) of young bears was lost**, likely due to a longer spring hunt in 2013 and severe



weather events in winter 2011/2012 and 2012/2013. This loss is in addition to the long-term decline in bear numbers.

- We note that ADF&G’s comments on Proposal 1<sup>4</sup> seem to completely dismiss the loss of an entire cohort, and instead they state “Research indicates that cub survival in Unit 9 shows no annual variation between alternating hunting years, and that cub survival and litter size is related to proximity of the bear population to carrying capacity and resulting density dependent effects.” **Losing an entire cohort when a population is declining has nothing to do with either density-dependent factors nor nearing carrying capacity, and with Alaska experiencing greater effects from climate change than the rest of the US, it should be expected that unusual severe storm events might become more common.** To ignore climate-related changes which can destroy an entire cohort, and which could do so again in the future, would be irresponsible.
- The total number of bears harvested in the last decade was notably less than previous decades, which is a sign of concern for the population.
  - During the February 23, 2018 Board of Game meeting discussion about proposal 132, this was theorized to be **the result of the inability of hunters to find bears because there were fewer bears to find** (and not a reduction in the desire to hunt brown bears).
- The age and size of harvested bears increased in the past decade as compared to previous decades, meaning **more older “trophy-sized” bears of both sexes are being killed in recent years, and fewer younger animals are being killed.**
  - Recognizing the concern with “mining” out the big bears, during the 2018 Board of Game meeting, the Board members voted to reduce the spring brown bear hunt by one week. This would give the remaining big males more time to leave the rivers before the hunting season began (because they are so visible when fishing at the rivers, these big bears are extra vulnerable to being hunted), and over a longer period, would give time for the younger generation of bears to grow up and take some of the hunting pressure off the large animals.
  - There has not been sufficient time, or population monitoring, to know if these strategies were successful.
  - However, ADF&G has claimed that the age structure has returned to normal, based solely on fall 2019 hunt statistics for male skull size (ADF&G email to Alaska Wildlife Alliance dated May 26, 2020). One “normal” year for one sex does not equate to a balanced age structure across the population, especially when looking at decadal trends. Before claiming victory, the single data point needs to be added to the rest of the data to understand what is occurring, and needs to factor in female data.
- ADF&G’s management guidelines for GMU 9 bears is to “maintain a high bear density”, but it is unclear how they measure a bear density, let alone ensure high bear density, when they are not conducting population surveys.

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<sup>4</sup> ADF&G Comments on Proposal 1 for the June 3, 2020 Special Meeting Regarding Spring Bear Hunts ([http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2019-2020/tele\\_06\\_03/adfg\\_prop1.pdf](http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2019-2020/tele_06_03/adfg_prop1.pdf))





- We asked ADF&G: “How do you define and measure “a high bear density” as referenced in management objective #1 for Unit 9 bears?” On May 26, 2020 they responded “We consider greater than 100 bears/1,000 km<sup>2</sup> to be high density in Unit 9.” Please refer to our concerns above about the lack of reliable data to estimate population size; when the data is at least 15 years old and over 30 years old in some parts of GMU 9, it is irresponsible to assume there are any amount of bears per 1,000 km<sup>2</sup>, let alone 100 bears/1,000 km<sup>2</sup>. There simply is no reliable data to support that ascertain.

### **Too much too soon equals potential disaster for Alaska’s most famous brown bears**

- Since fall 2011, approximately 2,150 brown bears were killed in biennial hunts by resident and nonresident hunters in GMU 9 (based on data ADF&G provided to Wayne Hall, May 8, 2020, and Alaska Wildlife Alliance, May 26, 2020). These numbers do not include any bears that may have been harvested in this spring’s biennial hunt by residents, nor the year-round near-village and subsistence hunts by residents.
- **There are already legitimate concerns about the current status and sustainability of the brown bear population in GMU 9, without adding extra hunting pressure.**
  - With a population of unknown size but declining for approximately 20 years, the loss of an entire cohort, and hunters taking a greater proportion of large adult bears, the population is already in distress. Not to mention the increased harvest in fall 2019 vs fall 2017 despite the Board of Game shortening the hunting season by one-third.
- Even if we assume no brown bears are hunted this spring season, adding a spring 2021 season would result in three back-to-back seasons where brown bears would be hunted and killed (spring 2021, fall 2021, spring 2022), something which hasn’t occurred since the 1970s.
- This proposal is only appropriate to consider after the end of the Spring 2020 season so we know how many bears were taken and can make a better determination. **The Board’s rush of this proposal suggests that they are doing it to ensure guides have economic prospects** and can roll over hunts. If the Board is rushing this because they want to conduct business through the existing Chairman, that is not a sufficient reason to hasten biologically teetering information.
- If the Board considers the smaller 2020 season a “wash” then allows increased harvest in 2021, the spring 2020 season should have been closed entirely. Instead, as of May 8, ADF&G had issued 36 permits to resident hunters for the spring 2020 season hunt, which is open through May 31 in some places. If the proposal is approved, the allowable level of hunts in spring 2021 should be reduced by the number of hunts that did occur in spring 2020.



## 2) The Board of Game's Decisions Should Reflect Alaska's Diverse Users of Wildlife

The Board of Game is mandated to manage wildlife for *all Alaskans* and favoring one over the other is in violation of the board's purpose. [Alaska Statute 16.05.221](#) (b) states: "...The governor shall appoint each member on the basis of interest in public affairs, good judgment, knowledge, and ability in the field of action of the board, and with a view to **providing diversity of interest and points of view** in the membership..." (emphasis added). This proposal from the Board of Game does not provide a diversity of interest, and instead focus solely on the interests of one user group, potentially at the detriment of other user groups.

### What makes hunters/hunting guides in GMU 9 special?

- Travel restrictions as a result of Covid-19 were statewide, and had negative economic impacts to industries large and small across Alaska. Affected industries include hunting guides as well as wildlife viewing guides who offer services in GMU 9. Why would one user group be afforded extra financial opportunities over another group using the same wildlife in the same area?
- AWA, as a small nonprofit completely dependent upon donations and grants for our success, fully understands the economic hardships endured by small businesses as a result of the pandemic. However, **we do not support the Board of Game jeopardizing the viability of the brown bear population solely to provide special economic opportunities to trophy hunting guides**, especially in light of the various methods of financial support made available by the Federal government under the CARES Act.
- Approval of Proposal 1, while economically beneficial the hunter/hunting guide user group in the near-term, could have dramatic adverse effects to other user groups. If the population is impacted, which is likely given the biological data, the impacts to other industries utilizing GMU 9 (e.g., bear viewers, sport fishing operations that sell bear viewing as part of the experience, etc.) would be immense. Not only are these other groups also suffering due to a drop in tourism this year, but could suffer dramatically in the future should overharvest occur. These bears are extremely famous, both in hunting and viewing arenas, and impacts to all wildlife uses should be taken into consideration for this decision.

### Wildlife viewing consistently brings a greater socio-economic benefit to the state than trophy hunting; why unnecessarily jeopardize those industries?

- A 2014 report ([The Economic Importance of Alaska's Wildlife in 2011](#)) demonstrated that wildlife viewing activities provided a gross economic value of \$14.93 billion whereas hunting provided less than \$2 billion (see Table 12 from that report below).
- A 2019 report ([Economic Development in Alaska: Outdoor Recreation – Impact and Opportunities](#)) documented that there was significantly more economic benefit to the state associated with wildlife viewing than hunting (see Figure 4 from that report below).



**Table 12. Economic Value of Hunting and Wildlife-Viewing Trips for Residents and Visitors in Alaska in 2011**

	Number of Trips	Trip Expenditures <sup>1</sup>		Net Economic Value		Gross Economic Value <sup>2</sup>	
		Total (Millions)	Average per Trip	Total (Millions)	Average per Trip <sup>3</sup>	Total (Millions)	Average per Trip
<b>Residents (Total)</b>	<b>7,042,000</b>	<b>\$7,764</b>	<b>\$1,102</b>	<b>\$2,066</b>	<b>\$293</b>	<b>\$9,830</b>	<b>\$1,396</b>
Hunters	1,052,000	\$1,345	\$1,279	\$461	\$438	\$1,806	\$1,717
Wildlife Viewers	5,991,000	\$6,419	\$1,071	\$1,605	\$268	\$8,024	\$1,339
<b>Visitors (Total)</b>	<b>985,000</b>	<b>\$6,232</b>	<b>\$6,323</b>	<b>\$844</b>	<b>\$857</b>	<b>\$7,076</b>	<b>\$7,180</b>
Hunters	15,000	\$158	\$10,324	\$12	\$765	\$169	\$11,089
Wildlife Viewers	970,000	\$6,074	\$6,260	\$833	\$858	\$6,906	\$7,119
<b>Hunting (Total)</b>	<b>1,067,000</b>	<b>\$1,503</b>	<b>\$1,409</b>	<b>\$473</b>	<b>\$443</b>	<b>\$1,976</b>	<b>\$1,852</b>
<b>Wildlife Viewing (Total)</b>	<b>6,961,000</b>	<b>\$12,492</b>	<b>\$1,795</b>	<b>\$2,438</b>	<b>\$350</b>	<b>\$14,930</b>	<b>\$2,145</b>
<b>Total</b>	<b>8,028,000</b>	<b>\$13,995</b>	<b>\$1,743</b>	<b>\$2,911</b>	<b>\$363</b>	<b>\$16,906</b>	<b>\$2,106</b>

Participation and Consumer Spending by Activity Type

Activity	Participation-Days	Total Activity Trip Related Spending <sup>+</sup>
Wildlife Viewing	5,159,000	\$2,196,544,590
Fishing	1,982,300	\$654,436,522
Backpacking/Hiking/Walking	1,880,489	\$38,479,486
Boating	233,137	\$1,910,782
Hunting	174,880	\$161,980,957
Camping	172,748	\$34,478,583
Bicycling	164,275	\$2,922,881
Gathering of Forest Products	119,293	\$6,996,935
Snowmachining	68,085	\$49,142,265
Cross-country Skiing	56,226	\$3,907,022
ATV/OHV/Other Motorized Activities	31,694	\$2,966,795
Downhill Skiing/Snowboarding	21,698	\$2,035,155
<b>Total</b>	<b>10,063,825</b>	<b>\$3,155,801,973</b>

Figure 4: Participation and Consumer Spending by Activity Type. Does not include equipment related expenditures. Source: CED calculations. See Appendix A for description of sources and methods



### 3) The Board of Game's Decisions Should Not Be for the Purposes, Whether Stated or Implied, of Providing Economic Opportunities to a Specific User Group.

#### The Board of Game's authority to change regulations is based on the conservation and development of game resources, not economic gain of a user group.

- As previously stated, the Board of Game was created for the conservation and development of game resources. While AS 16.05.255 (Regulations of the Board of Game; Management Requirements) outlines conditions under which the Board of Game may adopt regulations, to include "(a)(2) establishing open and closed seasons and areas for the taking of game" and "(a)(10) regulating sport hunting and subsistence hunting as needed for the conservation, development, and utilization of game", **AS 16.05.255 does not identify any situations allowing the Board of Game to adopt regulations for purposes of providing economic opportunities for users of game resources.** Based upon the purpose for the creation of the Board of Game, the presumption is that these regulations must be based on the conservation and development of game resources.
- The Board of Game does have authority under AS 16.05.255(e) "to adopt regulations to provide for intensive management programs to restore the abundance or productivity of identified big game prey populations as necessary to achieve human consumptive use goals...", however, **the requirements outlined in AS 16.05.255(e) have not been met for GMU 9** because the Board of Game has not identified that "depletion of the big game prey population or reduction of the productivity of the big game prey population has occurred and may result in a significant reduction in the allowable human harvest of the population" as it pertains to GMU 9.
- Since none of the specified conditions in AS 16.05.255 for changing regulations have been met, and there is clearly no conservation benefit to the brown bears resulting from the addition of a hunting season in spring 2021, the only logical conclusion is that this proposal was put forth to provide additional economic opportunities to hunters and hunting guides.

#### All indications point to this proposal being developed to provide additional economic opportunities for recreational consumptive users.

- On April 9, 2020, Alaska Wildlife Alliance had a conversation with [REDACTED] ADF&G biologist for GMU 9, to try and determine the impetus for the proposals and get background of the issue at hand. We were informed that the proposals were developed to accommodate hunters and especially hunting guides who are "on the hook for big hunts" to provide a means to make up for revenue lost due to Covid-19 travel restrictions.
- This perspective was supported during the April 14, 2020 Board of Game's teleconference by numerous testimonies from hunters and hunting guides who lobbied for an extra hunting season in GMU 9 for financial recompense, some because they refused to take advantage of financial support opportunities provided by the government.



- Examples of economics-based testimonies<sup>5</sup> submitted for the April 14 teleconference from hunters and hunting guides include:
  - “We cannot emphasize enough the economic necessity of working to adjust seasons to re-capture lost economic activity from hunting during the spring 2020 seasons.” (APHA; PC001)
  - “In regards to the Unit 9 2020 spring bear season, I favor pushing both resident and non-resident seasons to the spring of 2021... I favor keeping the 2021 Fall and 2022 spring seasons as scheduled to allow for making up some of the economic loss of losing this spring season. I realize there may be some unknown biological consequences.” (Paul A. Chervenak; PC012)
  - “My comments are made with the hope that solutions can be found that will minimize the negative economic/financial impact on the Guiding businesses, their employees, other small businesses that provide Big Game Commercial services and their employees, whose livelihoods depend upon these Spring Bear hunting opportunities.” (Richard A. Guthrie, Master Guide and Outfitter; PC020)
  - “Bear hunting accounts for over half my yearly income. I do understand there are loans available for some of us. I myself don’t want to borrow any money from the state or government.” (Bruce Hallingstad, registered guide; PC022)
- Alaska Wildlife Alliance believes **the Board of Game should not make regulatory decisions based upon economic benefits to one user group, but rather should make decisions on sound science and future sustainability of wildlife for all user groups**, and has submitted a Public Records Act request to ADF&G and the Board of Game to obtain records related to the origin of this proposal.

In summary, the Alaska Wildlife Alliance is very concerned about the Board of Game wanting to add an extra hunting season in the spring of 2021, when there normally would not be a hunt, for what strongly appears to be solely for the purposes of providing economic benefits to a single user group. This change would result in 3 back-to-back hunts, which hasn’t occurred since the 1970s because multiple seasons per year result in known overharvest. This is a brown bear population with an outdated abundance estimate, that is experiencing a long-term decline in numbers, which has lost an entire cohort, and for which a disproportionately large adults are taken over the past decade. Because there is no monitoring of the brown bear population, there is no way to know what kind of effect adding an extra hunting season next spring will have on the population. Some have dismissed any effects of an additional hunt next spring because they say there was no hunt this spring, however, the season was not closed and at least 36 permits for resident hunts were issued. Since the season hasn’t officially closed yet, and permits were issued, it is premature to assume no bears were killed this spring, and premature to make decisions about adding a hunt next spring.

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<sup>5</sup> Excerpts obtained from the “On Time Public Comments” document associated with the April 14, 2020 Board of Game’s Special Meeting on Spring Season Bear Hunts, available on the Board of Game website: [http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2019-2020/tele\\_4\\_14/pc\\_all.pdf](http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2019-2020/tele_4_14/pc_all.pdf)

Thank you for taking the time to read our comments. We hope the Board weighs the consequences of adding another hunting season and considers the serious and long-lasting implications that overharvest would have on multiple user groups, including hunters and hunting guides.

Sincerely,



Nicole Schmitt, Executive Director\*  
Alaska Wildlife Alliance  
PO Box 202022  
Anchorage, AK 99520  
907-917-WILD (9453)  
nicole@akwildlife.org

\* Residing in Anchorage but representing members throughout Alaska and beyond



Proposal 2 5 AAC 92.050 Comments April 22, 2020

Alaska Board of Game,

These are my comments / suggestions for with regard to 5 AAC 92.050 drawing permits for regulatory year 2019 spring. The drawing permits applied for in December 2020 (regulatory year 2020 for spring 2022) should be reduced to accommodate replacement tags for those lost to this year’s travel restrictions. For example: regulatory year 2019 DB246 has 6 resident permits. If every person responded to the questionnaire that their first choice was spring 2022 (regulatory year 2020), then in the regulation year 2020 for spring 2022 there would be no drawing for DB 246. If, for example, half said they would like spring 2022 and half spring 2023 then the drawing permits available for that same area would be reduced by half each of the regulatory years 2020 and 2021. Similarly, for guided nonresidents (DB 146) their tags would move to spring 2021 and there would no permits available for nonresident draw in regulatory year 2020 for spring 2021.

- A. Send a letter to every affected permit holder asking them these two questions:
  - 1. If you are a nonresident do you want a replacement tag issued for spring 2021? \_\_\_\_\_
  - 2. If you are a resident, please rank your 1<sup>st</sup> and 2<sup>nd</sup> choice for a preferred replacement hunt year.
    - \_\_\_\_\_ spring 2022 resident
    - \_\_\_\_\_ spring 2023 resident
    - \_\_\_\_\_ neither spring 2022 or 2023

Note, if you are a nonresident and say no or are a resident and mark neither spring 2022 or 2023 the state will refund your application fee and your permit will not be reissued.

- B. If we do not receive a response the state assumes a replacement tag will not need to be reissued for a future year.
- C. Responses are sorted by unit. The accumulation of this data will help the state go about being as fair as possible to the affected permit holder.
- D. Those permit holders responding will be given a permit for their preferred year or application refund. The number of drawing permits for spring 2022 and 2023 would then be adjusted downward to allow for the replacement permits. Then the number of permits to be drawn (applied for) in December 2020 would be reduce by the number of replacement permits for spring 2022. Applications in December 2021 would reduce those for spring 2023.

Full disclosure: I am one of the resident hunters who holds a permit for spring 2021. Access to the various areas is not that easy. I can’t imagine having 12 resident hunters, 8 nonresident hunters and their associated parties all in the area at once. Reducing the draw to accommodate all hunters would be a great choice. Yes, it’s unfortunate that they would have to postpone for 2 years (resident) or 1 year (nonresident) but it’s way better than losing the tag.

Sincerely,

Mary Anderson  
Anchorage, AK

## PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear.

cma319 <cma319@gmail.com>

Tue 5/26/2020 7:15 AM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

Hello,

I am writing to express my opposition to the proposal for an extra spring bear hunt in 2021. I am an enthusiast of bear watching and wildlife photography, and have taken trips, and will take many more, to Alaska (particularly the Alaska Peninsula) to view brown bears. We always take the opportunity, on these trips, to take fishing charters and other excursions. I spend money in the communities of King Salmon, Homer, and Anchorage, among others (Wrangell is a favorite too). If brown bears become scarcer, my tourist dollars will be lost. Use current science to guide your limits. Please do not favor one economic sector (hunting) over another (bear watching/photography).

Christy Avery  
Bellingham, WA

Sent from my T-Mobile 4G LTE Device





Submitted By  
Adam Babcock  
Submitted On  
5/25/2020 7:47:00 PM  
Affiliation

[PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear](#) I'm writing to oppose Proposal 1 which would result in three consecutive seasonal bear hunts in unit 9. The proposed hunt is being touted as economic stimulus for the state, but it would positively impact only a few guides and outfitters, would be very damaging to an already declining population of animals, and would have a negative impact on the much broader economic value of wildlife viewing tourism. And lastly, it simply isn't right to trade the lives of animals just to play favorites to high-dollar hunters and their guides/outfitters. Selling out our wildlife so that a few guides/outfitters can benefit financially - in the tens of thousands of dollars per hunt? That would make us money [REDACTED]. I support limited, sustainable hunting that keeps animal populations in check and provides recreational and subsistence hunting opportunities to Alaskan residents and non-residents alike, but the preponderance of evidence suggests that the population of bears in Unit 9 is declining and vulnerable to such intensive hunting. Let's not become money [REDACTED] to a few wealthy hunters in the name of economic stimulus. Let's do the right thing and protect a vulnerable population while we still can.

Sincerely,

Adam Babcock

**Comments On: PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear.**

AK Adventures <dave@akadventures.us>

Wed 5/27/2020 12:38 PM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

May 27, 2020

Re: PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear.

Dear Board of Game Members:

I ask the Board of Game (BOG) to Oppose or Not Approve this proposal creating an additional spring brown bear hunting season in 2021 in Game Management Unit (GMU) 9 for the following reasons:

1. Brown bears have a very low reproductive rates and BOG allocations are supposed to be based on "sustainable yield". Having 3 consecutive hunts in a 12-month period in areas like GMU 9C and 9E where over-harvesting has occurred poses a conservation concern for this population of bears.
2. The Spring 2020 hunt in some areas of GMU 9 does not end until May 31 and at least 36 permits were issued. Since the current season hasn't officially closed and permits were issued, it is premature to assume no bears were killed this spring.
3. There is no biological emergency requiring that the BOG act on this issue at this time. What data is being used to arrive at the determination for authorizing this additional hunt?
4. This is a BOG generated proposal which does not reflect a "diversity of interest", and instead is focused solely on the interests of one user group, potentially to the detriment of other user groups. In addition to Alaska residents who regularly engage in wildlife viewing. The wildlife viewing, wildlife photography, and sport fishing businesses, who often provide their clients with bear viewing opportunities would also suffer from over-harvesting by one group if the population falls.

Alaskans depend upon you to make sound wildlife management policy decisions that recognize the diverse values Alaskans hold for wildlife, including those with livelihoods that depend upon the ability to provide visitors with world-class bear viewing opportunities. It is crucial for all users that a healthy population of bears is maintained for this region.

Thank you for considering my comments.

Regards,

Dave Bachrach  
AK Adventures, Inc.

Homer, AK 99603

Submitted By  
Jos Bakker  
Submitted On  
5/26/2020 7:19:19 PM  
Affiliation

Phone  
9077231581  
Email  
[josb1214@aol.com](mailto:josb1214@aol.com)  
Address  
PO Box 211403  
Auke Bay, Alaska 99821

Proposal1 - 5 AAC 85.020. Seasons and bag limits for brown bear.

**I oppose proposal 1 - 5 AAC 85.020**

There have been no instances in almost 45 years in which multiple hunting seasons per year were authorized, because the bear population has not been robust enough to support multiple seasons per year.

Alaska Department of Fish and Game's bear biologist for GMU9 said that the brown bear population could not sustain an additional level of harvest, even the comparatively low level of harvest by residents.

## June 3rd - Board of Game Special Meeting Comment

Bill Bast <wbast@yahoo.com>

Tue 5/19/2020 2:09 PM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

**I am writing to support the Board of Game's Proposal #2 to: "Allow the transfer of 2020 spring season drawing permits to a future year for hunting black bear in Units 1-3, and 14C JBER, and brown and grizzly bear in Units 4, 8,10, 14C, 22 and 26B".**

This is certainly an unprecedented time for all of us. Nobody truly knows what the future holds or what that will even look like once the world has a better handle on this pandemic. And since there are so many unknowns, I appreciate that the Board of Game has acted quickly and decisively to debate (and potentially allow) the transfer of Kodiak spring brown bear draw permits for Alaskan residents to a future year. These permits are highly coveted and it would be a shame for those permits to go unused for the individuals fortunate enough to have drawn them.

I was born and raised in Fairbanks and have lost count of how many times I have applied for a Kodiak brown bear draw permit. I was lucky enough to be drawn this spring for the first time and then COVID-19 happened. I completely agreed with the governor's decision to restrict intra-state travel for non-essential purposes and also agree that traveling to Kodiak from Fairbanks to hunt is not essential. But it was the right thing to do to protect the community of Kodiak. Nevertheless, It was extremely disappointing to realize that my dream draw permit would expire unused.

It is also refreshing to watch the Board of Game react so quickly on this issue. There were only a couple hundred or so permits for Resident Kodiak brown bear drawn this spring so it would be easy for the Board to dismiss this as a natural disaster-like event and just ignore it. But this is exactly how I believe the Board of Game should function for the benefit of Alaska residents and I am optimistic that the Board will do the right thing and allow the transfer of these permits to a future year.

I want to express my gratitude to all Board of Game members and ADF&G employees who recognize the importance of this issue to those Alaskans who were drawn and who are working through this issue for all of us.

Kind Regards,

Bill Bast  
Fairbanks resident



**Department of Commerce, Community,  
and Economic Development**

BIG GAME COMMERCIAL SERVICES BOARD

P.O. Box 110806  
Juneau, AK 99811-0806  
Main: 907.465.2543  
Toll free fax: 907.465.2974

May 21, 2020

Chairman Ted Spraker  
State of Alaska, Board of Game

RE: BGCSB GMU 9 2021 GUA Restriction Proposal

Dear Chairman Spraker,

As you know, the State of Alaska Big Game Commercial Services Board (BGCSB) is tasked with regulating the Professional Big Game Guiding and Transporter industries in the State of Alaska.

The BGCSB has reviewed the below proposed changes that the Board of Game (BOG) will consider on Wednesday, June 3<sup>rd</sup> during the special meeting:

- 1.) Open a spring 2021, resident and nonresident brown bear hunting season in Game Management Unit (GMU) 9 under 5 AAC 85.020;
- 2.) Modify 5 AAC 92.050(6) to allow the transfer of 2020 spring season drawing permits to a future year for hunting black bear in GMUs 1-3, and brown and grizzly bear in GMUs 4, 8, 10, 14C, 22, and 26B.

We understand, and appreciate, that there are valid concerns that should the BOG adopt these above proposals, particularly Proposal #1, that there could be two primary unintended consequences.

Firstly, that while it is clearly the intent of the proposals to allow in 2021 for lost opportunity in the 2020 season due the closure of the Spring 2020 Non-Resident Bear Hunting Season that some within the guiding industry could view this as a unique and "extra" opportunity to guide / operate in GMU 9 in the Spring of 2021 when they had not previously, in the Spring of 2020, intended to do so; there could be a "bear rush" (akin to a land grab) and influx of guides trying to operate in GMU 9 in the spring of 2021.

Secondly, there is the potential for guides that had planned to operate in GMU 9 in the Spring of 2020 to potentially "double dip" and ultimately end up contracting for more



hunters in GMU 9 in the Spring of 2021 than they had intended to contract hunts for in the Spring of 2020.

These potential issues are concerning to the BGCSB, both from a conservation perspective as well as a quality of experience perspective for all GMU 9 users. While we do fully support the BOG's efforts to allow for the non-resident hunter lost opportunity in 2020 we do not want to encourage, ultimately, more anticipated harvest than would have occurred had there been the traditional Spring 2020 Bear Season and the traditional Fall 2021 season. Under your proposal #1, ultimately the anticipated bear harvest will likely be the same as it is still a Spring bear season and a Fall bear season, just condensed into the same calendar year to allow for the lost opportunity.

To this end, a BGCSB Regulation Proposal has been drafted, please see attached, to address the concerns regarding Proposal #1 and this proposed regulation will be fully discussed and voted on by the BGCSB during its July 22, 2020 public teleconference meeting and I have no reason to believe that this proposed regulation will not pass. We believe this Proposed Regulation will adequately address the concerns of a "bear rush" and/or "double dipping".

With regards to BOG Proposal #2, the BGCSB does not believe it's in our purview to directly address this proposal through regulation but we are in full support of Proposal #2 as it does allow for lost opportunity due to the 2020 Spring Non-Resident Bear Season closures statewide.

Aside from Mr. Larry Van Daele, the Board of Game designated appointee to the Big Game Commercial Services Board who appropriately abstained from voting, all currently active and engaged Big Game Commercial Services board members have voted in full support of me sending you this letter and associated attachments and hopes the Board of Game will vote to pass these changes, as proposed.

I thank you and your board members for your time and consideration and the Big Game Commercial Services Board stands ready to assist the Board of Game in any way that we can to help our state, it's people and its resources through this unique and challenging time we all find ourselves in.

Sincerely,

*Henry D. Tiffany IV*

Henry D. Tiffany IV  
Chairman, BGCSB

Big Game Commercial Services Board  
**REGULATION PROPOSAL**



PC009  
3 of 4

If you wish your proposal to be considered by the Board at the next scheduled meeting, the proposal must be received by the Division by close of business 45 days before the first day of the scheduled meeting. You may photocopy this form if necessary.

***Proposals must be typed or printed legibly in ink.***

Is this a proposal for a new regulation?  YES  NO

If "yes", which Alaska Statute (AS) under 08.54 supports your new regulation? AS 08.54. 600

Is this proposal an amendment to an existing regulation?  YES  NO

If "yes", what is the regulation number? AAC 75. 230

Proposal: Please See Attached Proposal

Who is it likely to benefit: All Hunters / Clients and Guides that were scheduled to hunt and/or operate in GMU 9 in the Spring of 2020 but were not allowed to because of the closure of Non-Resident Bear Hunting for the Spring 2020 in GMU 9 by State of Alaska order.

Who is likely to suffer? Guides that would hope to "capitalize" on the "extra" Spring 2021 if so granted by the State of Alaska Board of Game (BOG). This would not be an "extra" available season to guides that do not normally operate in GMU 9 but is to allow for the lost opportunity in 2020 due to the COVID-19 Pandemic.

What will happen if nothing is done? There is a valid concern that should the BOG create a special Spring 2021 season to make up for the lost opportunity in GMU 9 in the Spring of 2020 that there could be a "bear rush" (akin to a land grab) of guides who had not previously planned to operate in GMU 9 trying to capitalize and benefit from this opportunity and/or "double dipping", where guides might try to take more hunters in 2021 than they would have in 2020.

If your proposal is an amendment to an existing regulation, you must provide the regulation number to the proposed amendment. If your proposal is for new regulation you must provide the Alaska Statute number under 08.54 that supports your proposal. Failure to provide this information along with your printed name will result in your proposal not being submitted to the Board for consideration.

Proposed by: Henry D. Tiffany IV Date: 05/18/2020  
(Printed Name)

Mailing Address: P.O. Box 329 Ester, Alaska 99725

Telephone Number (optional): \_\_\_\_\_

Email Address (optional): \_\_\_\_\_

**Mail To: Big Game Commercial Services Board  
PO Box 110806  
Juneau, AK 99811-0806**



Regulations Proposal -

Sec. 08.54.600. DUTIES OF BOARD. (a) The board shall (6) adopt procedural and substantive regulations required by this chapter;

12 AAC 75.230 is amended by adding new subsections to read:

(f) a registered or master guide who was unable to hunt a brown bear in game management unit 9 in the spring 2020 season may register for the 2021 spring brown bear season in game management unit 9, if

1) the registered or master guide registers on a form provided by the Division;

2) the registered or master guide provides either

A) a current registration, valid as of April 10, 2020, for the same guide use area for which the registration is submitted; or

B) copies of completed, signed, and dated hunt contracts for the 2020 spring bear season in game management unit 9 indicating the registered or master guide had booked clients who were later unable to complete the contracted hunt and an attestation that the registered or master guide would have registered prior to the April 10, 2020 deadline; and

3) the clients for whom the registered or master guide will provide services have not hunted brown bear in a guide use area within game management unit 9 since May 10, 2020.



Submitted By  
David Blake  
Submitted On  
5/6/2020 5:00:32 AM  
Affiliation  
hunter

I was booked to brown bear hunt in May of 2020, and have a sizeable deposit with outfitter, Warren Johnson, for unit 9. I am in favor of having a Spring season for brown bear in 2021. This would make the most sense, since it will get you back to your "Spring in even years and Fall in odd", in just one year. This will also keep me from having to wait so long (2022 for Spring), as health could become an issue at 69. I believe the # of the proposal is 5AAC 85.020. Thank you.

Submitted By  
George Blankenship  
Submitted On  
5/26/2020 4:34:03 AM  
Affiliation

Phone  
7242444427

Email  
[gblanke@comcast.net](mailto:gblanke@comcast.net)

Address  
132 Whistle Drive  
Harrison City, Pennsylvania 15636

Dear Alaska Board of Game,

Thank you for the opportunity to comment on PROPOSAL 2 - 5 AAC 92.050. related to transferring spring bear permits from 2020 to future years 2021 and 2022, if I understand the proposal correctly. I am a lifelong hunter and conservationist and believe without a doubt that hunting is critical to wildlife conservation. I am also one of the 2020 spring brown bear permit holders for Unit 8 and fully support the proposal to transfer my permit to a future year. It appears I will be able to reschedule my hunt for 2021 and appreciate my outfitter's cooperation in allowing me to do that. However, to accommodate my hunt and possibly other hunters from 2020, my outfitter, and likely most other outfitters, may be forced to move currently booked hunter(s) for those future years to a later year or return their deposits. Proposal 2 is unclear about how the regular permits for the spring of 2021, 2022 and 2023 will be handled in light of the transfer of the 2020 permits. While I realize these are unprecedented times and drastic measures have had to be taken, like canceling the 2020 spring bear hunts, I strongly urge the ADF&G to maintain the current regular permits for the spring and fall of 2021, 2022 and spring of 2023 and allow the 2020 spring permits to be used in either the fall of 2020, the spring or fall of 2021, 2022 or spring of 2023. This would provide outfitters and hunters maximum flexibility to work together to reschedule hunts and maintain hunts already scheduled for future seasons. At the same time, it will allow outfitters to make up some of their losses as a result of the cancelled hunts, while not resulting in any increase over the multi-year period of overall bear permits or harvests. I did listen in on the April 14 AK Board of Game teleconference and I understand that Proposal 2 is not intended to make up for the financial losses resulting from the cancelling of the 2020 spring bear season. However, I am concerned that if outfitters are not permitted to make up for some of these losses, some outfitters may not be able to survive and those that do, may struggle to offer the same level of services that I believe they all strive to offer. In addition, this will result in as little disruption to all hunters as possible, both those for the spring 2020 bear season that have to reschedule or cancel and those booked in future years. I know your goal, as shared on the April 14 teleconference is to recover some of the lost hunting opportunities for 2020 spring bear hunters and I believe that can be done without creating additional lost hunting opportunities for future year hunters if the regular permits for those future years are maintained in addition to the transferred permits. Again, I applaud the Board for their efforts during this difficult time, and appreciate the ability to move my permit to a future year, but I recommend maintaining the regular permits for those future years while allowing flexibility on when the transferred permits can be used. This will allow maximum flexibility for outfitters and hunters while not increasing the total number of permits or bear harvests over this multi-year period.

Thank you again for the opportunity to comment on this very important issue for Alaska and the hunting industry overall.

George Blankenship

2020 AK Hunting License #20604763

Submitted By  
Thomas Bodin  
Submitted On  
5/4/2020 10:26:10 AM  
Affiliation

Phone  
2625211316  
Email  
[tebodin@hirep.net](mailto:tebodin@hirep.net)  
Address  
3412 Summit Ave  
Waukesha, Wisconsin 53188

Proposal 2 5AAC92.050

As a non-resident of Alaska, I was affected by the closure of the spring 2020 Black Bear hunt in unit 3.

Please adopt and pass this proposal to extend the right to hunt in 2021 using our current tags. I was bringing another friend with me, who also had a tag and had never been to Alaska or bear hunted before. You can imagine his disappointment when I told him we can't go. We had to cancel airline flights, hotel reservations, lodge reservations, reschedule vacations and other things. We applied for this tag in December of 2018, just to hunt this year. If this doesn't pass we will have to start the process all over again and would be able to hunt until 2022. Please take this into consideration when making the decision. If this doesn't pass when will I get my refund for my hunting license??

I've been to Alaska three times before hunting and fishing. I'm hoping to bear hunt in 2021.

Thanks

Thomas Bodin

Submitted By  
Coby Brock  
Submitted On  
5/27/2020 11:04:40 PM  
Affiliation  
Kiss A Moose, LLC

Dear Board of Game:

As a wildlife photography company, we are deeply concerned about the proposed bear hunts, especially the spring brown bear hunting season in Unit 9. Alaska Peninsula brown bear population surveys have been inadequate, unreliable, and outdated. The spring bear hunt fails to consider the impact to brown bear population, wildlife viewing opportunities, and managing bears for ALL Alaskans instead of special interest groups like trophy hunters. Therefore, we urge you to protect the interest of all Alaskans by voting NO on this ridiculous proposal.

Hunters and guides need to use the federal and state aid provided to make up for the financial loss caused by any missed hunts. The federal government has offered Pandemic Unemployment Assistance, the Paycheck Protection Program, and the Economic Injury Disaster Loan. The State provides \$5,000 and \$10,000 grants for those who did not apply for federal assistance. There is no scientific reason offered for this hunt. It is purely being proposed to satisfy guides. It does not consider the devastating impact it could have on the bear population or financial loss for years to come for wildlife viewers. The federal and state programs should be relied on to recover financial loss--not killing bears.

The proposal could have devastating impacts to the wildlife viewing at our national parks and the famous McNeil River State Game Sanctuary and Refuge (McNeil River). McNeil River was established in 1967 by the State of Alaska to protect the highest brown bear population in the world. Alternating hunting cycles have preserved the population and prevented overharvest from greedy trophy hunters. Having three hunting seasons to kill these bears is unconscionable and shortsighted. Fish & Game's own biologist questions the population levels of this region.

Simba is a female brown bear who lives on the Alaska Peninsula. She comes to McNeil River every year, as she has for the past two decades. She is comfortable at McNeil River with her cubs because the humans are predictable. They stay in tight groups of ten, never threatening her or her young family. A hunter will not recognize Simba, and know that she is only passing through with her cubs. He or she is more likely to view her simply as a paycheck.

On Coby's first trip to McNeil River, he was close enough to touch Ears. He is an older bear known for coming close to humans because other bears will leave him alone to eat his fish in peace. Ears is important for two reasons. The first reason is to demonstrate that many of the bears who live along the Alaska Peninsula lack the typical fear of harm from humans and are very tolerant of predictable, human behavior. The second reason is to demonstrate the value of a bear like Ears. He is the subject of two of our best-selling images. We estimate that forty percent of the pictures that we sell are from our trips to McNeil River. Hundreds of people take pictures of Ears and encounter him every year. One hunt too many could end his life and the enjoyment for everyone else.

Going to McNeil River is not inexpensive, though the permit fee is nominal for the four-day guided experience. It generally takes a flight or 5-hour drive to Homer, renting a place for the night, and an \$850 float plane to the sanctuary. We repeatedly make this trip because of the income it provides to us. While it has been estimated that the bearviewing brings in over thirty million dollars and five hundred jobs, the number missing from the equation is the profit from these sorts of trips. We have sold hundreds of thousands of dollars directly to customers and wholesale orders to stores all over the state. Our pictures are enjoyed in homes all over the world. We will be returning to McNeil River again this year because it is the best wildlife viewing in the world and Alaska Peninsula bears create our most iconic images. We're just two people putting a couple thousand dollars in towards a \$4.5 billion tourism industry.

We have many close friends who came to Alaska from all over the world for bear viewing. They all go back home with these once-in-a-lifetime images and memories, many of them as full-time photographers who have a six-figure revenue each year from their bear pictures. We have friends who are guides in nearby Katmai and Lake Clark National Parks that are concerned about how this hunt will impact the bears there.

Alaska is on many people's bucket lists to see the final habitat where bald eagles, salmon, and brown bears still exist. We are the end of the road. We are also the last people who can get it right. It is unprecedented to have three hunts in a row because it is unreasonable and unscientific. Wildlife viewing brings in millions of people to the state and billions of dollars. It is far more lucrative than hunting because ten times more people go wildlife viewing compared to hunting. Wildlife viewing should be considered when proposing bag limits. Fish & Game already made the unsustainable decision allowing nearly every Archipelago wolf to be killed last season. Don't make the same mistake with our Unit 9 bears.

Sincerely,

Coby Brock and Jennie Frost

Kiss A Moose, LLC

Submitted By  
John Burick  
Submitted On  
5/6/2020 8:28:02 AM  
Affiliation  
Resident Hunter

5 May 2020

State of Alaska

Alaska Department of Fish and Game

Alaska Board of Game

RE: Proposal # 2

Dear Board Members,

As written, I am in OPPOSITION to Proposal Two for the following reasons (I'm mainly addressing my concern for Unit 8, but should be applied equally to all drawing hunt bear permits covered in Proposal 2):

1. Allowing Spring 2020 drawing permit resident and non-resident hunters to participate in 2021-2023 spring hunts puts unnecessary pressure on an already limited resource. There will be an increase in the number of hunters in any given area, yet the same number of quality bears, in the same area.
2. The potential for over harvest exists. Essentially if every permit holder from 2020 and 2021 hunts in the same year the State has doubled the number of hunters in the field. Looking at harvest rates for Unit 8, this could adversely affect future bear management as well as hunting opportunities for a number of years into the future as well as reduce trophy quality.
3. Allowing 2020 hunters to hunt in 2021 also increases the use by permitted Guides and their clients. First, I see a shortage of qualified Guides and Assistant Guides for the area as well as there being more pressure on the Resident hunters. If we again double the amount of nonresident hunters, there will be double the number of Guides, who may or may not be able to safely and ethically provide enough Guides and Assistant guides to meet their demand. They only have so much time to hunt and a limited area. Let's face it, Guides are better equipped, have more resources, and know the area better. I foresee more resident/Guide animosity, which I feel the State can do a better job controlling.
4. In the grand picture, this increase in hunters in the field is far reaching. From increased pressure on Transporters, Guides, and the local economy the task of hurrying to get a job done, potentially could lead to an accident or unsafe situation for someone.

For what it is worth, I would like the Board to amend Proposal #2 to the following for Unit 8 (all drawing hunt bear permits covered in Proposal 2):

1. Successful Spring permit 2020 hunters would be allowed to hunt in the Spring 2021 ONLY.
2. Successful Spring permit 2021 hunters would be allowed to hunt in the Spring 2022 ONLY.
3. The Fall season is in the air at this time, but could follow the same allowance; again FALL ONLY.
4. Since the 2021-2022 application period for drawing hunts has not been published yet, there would be NO drawing hunts for Residents or Non-Resident hunters for the 2021-2022 regulatory year.
5. The drawing period application, allocations, and schedule resumes after the Spring 2022 season concludes.

Thank you for your time and consideration in this matter. If there are any questions, please feel free to contact me.

Sincerely,

John Burick

Juneau, AK 99801



## Comment on Proposal #1 for June 3 Special Meeting Regarding Spring Bear Hunts

larsenbaylodge@aol.com <larsenbaylodge@aol.com>

Thu 4/16/2020 8:30 AM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

I am a guide for brown bear in GMU 8.

I support the proposal to allow the transfer of spring 2020 drawing hunt permits to a future year. I request it be at least transferable to 2021 and 2022, preferably 2023 as well. I do not have the capacity to guide the clients already booked for 2021 in addition to the clients from 2020.

Thank you.

Victor Michael Carlson

Community of Residence: Larsen Bay on Kodiak Island

Larsen Bay Lodge  
PO Box 92  
Larsen Bay, AK 99624  
907-847-2238

Submitted By  
Jeff Chadd  
Submitted On  
5/18/2020 2:37:05 PM  
Affiliation

Phone  
4063475401  
Email  
[sheephunter@majesticmountainoutfitters.com](mailto:sheephunter@majesticmountainoutfitters.com)  
Address  
PO Box 5036  
Forsyth, Montana 59327

**May 18, 2020**

**BOG Special Meeting Regarding Spring Bear Hunts – June 03, 2020**

**Proposal 1 – 5 AAC 85.020 Hunting Seasons and bag limits for brown bears**

Establish a single season brown bear hunt for resident and nonresident permittees of the 2020 spring registration hunt for Spring 2021 in Unit 9.

To Whom It May Concern;

As a Master Guide who has been participating in Alaska Peninsula brown bear hunts since 1984 I am in full support of Proposal 1.

I recommend that:

- Resident and nonresident hunters be given an additional hunting opportunity, due to the cancellation of the spring 2020 brown bear hunts.
- Since the Unit 9 C, D, and E bear season is 6 days shorter than the 2018 season (and bears were not hunted in 2020), adding a spring 2021 season should not adversely impact the bear population. In addition, Unit 9 consists of a large portion of federal lands where guides are already limited by a specific number of hunters.
- Residents that received a registration permit in Unit 9 in 2020 should be excluded from this special 2021 spring season.

Thank you for your time and effort working for a solution during this COVID-19 emergency closure. It is good to work together to give all hunters and guides the opportunity to get back out in the field and hunt in the spring of 2021.

Sincerely,

Jeff Chadd

Master Guide #125

Submitted By  
Tom Croffut  
Submitted On  
5/26/2020 3:30:05 PM  
Affiliation  
Wildman lodge

I Support Proposal #2. For a Special Brown Bear Season on the Alaska Peninsula in May 2021, to replace the lost opportunity this year, due to COVID-19.

Fish & Game sees no negative impact on the resource, infact the bear age, pregnancy rate and population will benefit from the one year delay.



## Unit 1-3 2020 draw tags

Alisha Decker <decker@glaciersguidesinc.com>

Mon 4/13/2020 12:52 PM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

Cc: Alisha Mutts Decker <decker@glaciersguidesinc.com>

- Modify 5 AAC 92.050(6) to allow the transfer of 2020 spring season drawing permits to a future year for hunting black bear in GMUs 1-3, and brown and grizzly bear in GMUs 4, 8, 10, 14C, 22, and 26B.

### **Oposition to modify** 5 AAC 92.050(6)

#### ***Units 1-3 Black Bear***

Kuiu draw hunter participation rate is 80-90% for the Non Resident, Non Guided Hunter. ADF&G issues 50 permits a year and season dates starting in September 1, 2019 - June 30, 2020.

This **ONLY APPLIES** to Non-Guided Hunters. The Guided Non resident hunters Using a USFS permitted guide also use the landscape at the same time and in the same places. Moving these 50 Hunters to hunt spring of 2021 will cause conflict with other users of National Forest Land. Guide Outfitters who also lost the spring 2020 season have no way to recapture those hunters unless they have openings in their 2021 hunt allocation. At this time USFS has not amended permits for the 2021 season to increase our use. We also have a fragile balance with multi user groups on the Tongass. Small ship tour operations are looking to also recapture and recover from this pandemic. A joint BMP of user groups has now been in place for a few years. Increasing Non resident non guided hunters on the landscape for spring 2021 will have a ripple effect with the public use on National Forest Land.

We recommend BOG cancel all 2020 Non resident, Non Guided tags for September 2019- June 2020 season regulatory year. Allow those hunters the option to hunt in the September 2021- June 2022. Reducing the number of draw permits available in the December 2020 draw not to exceed the recommend hunts available for units 1-3.

**Unit 4** Open Non Resident Brown Bear May 10-31 2020, Unit 4 has only 15 USFS permitted Brown Bear Outfitters. We operate vessel-based spring hunts that accounts for 80% of our yearly revenues. We do not transit the smaller townships and communities; our hunters simply transit Juneau or Petersburg. We would, of course, still have to work with individual hunters to see if they are willing and/or able to travel. I ask that you consider May 10-May 31 for a Non-Resident opening of the Unit 4 Brown Bear season.

Thank you,  
Zach Decker  
Glacier Guides Inc.  
Gustavus, AK  
(907)209-4906

## Proposal #1

Neil DeWitt <neilfxrt84@msn.com>

Tue 4/14/2020 3:16 PM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

During the 14 April 2020 special meeting while speaking about special concerns for refunds or if you can hunt at another time, I think chair member Spraker needs to look at military folks in a different light. They cant hunt if they're deployed to Afghanistan or Iraq. If they've been drawn they should be able to have the opportunity when they get back from that said deployment. I feel special circumstances are involved here. They're defending the freedoms that we are actually taking.

Thank you for your interest in this,

Neil DeWitt

Anchorage AC member

Sent via the Samsung Galaxy S10e, an AT&T 5G Evolution capable smartphone

## Spring Season - Black bear - 2.) Modify 5 AAC 92.050(6)

Jon Dutton <jdutton@graniteprop.com>

Thu 5/14/2020 10:23 AM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

To Whom it may concern,

I am writing you to petition regarding 2020 spring bear season closures. I respectfully request please do not allow nonresidents who successfully drew a 2020 spring Black Bear permit in GMU's 1-3 to roll their permit to the 2021 season. The risk for crowding of hunters is great. Allowing hunters to roll forward a permit would greatly diminish the safety of those hunters in the field and the quality of the hunt due to overcrowding. Additionally it will have significant impact on harvest for that year and thus the population for years to come.

Instead I request that the ADF&G issue a refund for both the locking tag (if already purchased) and a refund for the nonresident license and any applicable draw fee for that hunt code.

Yours in conservation,

Jon Dutton

**Jon Dutton**

Granite Properties | Leasing Manager

3151 Briarpark, Suite 200

Houston, TX 77042

713-800-9521 (direct)

[www.graniteprop.com](http://www.graniteprop.com)

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## Alaska Board of Game Schedules June 3, Special Meeting Regarding Spring Bear Hunts

Ron Egelston <eggelstonr@yahoo.com>

Sun 5/24/2020 11:27 AM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>; DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

Dear Sir or Ma'am, enclosed are my comments for the June 3 special meeting regarding spring bear hunts.

Submitter's Name: Ronald Egelston

Community of residence: Eagle River, Alaska

PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear. Open a spring 2021 Unit 9 brown bear season for residents and nonresidents (HQ-F19-BGP#1)

I support Proposal 1 with 3 recommendations.

1. That residents that hunted Unit 9 during the spring 2020 season not be allowed to hunt in 2021 if they were not successful.
2. Only non-resident hunters who were contracted for the spring 2020 season be allowed to hunting the spring 2021 season. Non-resident hunters who were not contracted for the 2020 spring season would not be allowed to hunt in the spring 2021 season.
3. That a hunter's status as a resident or non-resident during the spring 2020 season is the status they will use in the 2021 spring season regardless of status in 2021.

PROPOSAL 2 - 5 AAC 92.050. Required permit hunt conditions and procedures. Provide the Commissioner the authority to transfer spring black bear drawing permits for Units 1-3 and 14C (JBER), and spring brown bear drawing permits for Units 4, 8, 10, 14C, 22 and 26B to future hunting seasons. (HQ-F19-BGP#2)

I support Proposal 2 and recommend that a hunter's status as a resident or non-resident at the time of the spring 2020 season is the determining factor as a resident or non-resident during the period when the permit is transferred.

Submitted By  
Michael Ellis  
Submitted On  
4/25/2020 10:52:51 AM  
Affiliation

Phone  
(503)866-9970  
Email  
[mabry75@yahoo.com](mailto:mabry75@yahoo.com)  
Address  
30108 NE 60TH ST  
CAMAS, Washington 98607

**RE: 5 AAC 92.050.**

To ADFG:

Thank you for considering this proposal to allow my planned 2020 spring bear hunt to occur in a following year. This is a generous and fair solution to the problem facing all us with this awful pandemic. I look forward to utilizing this coveted tag in a future hunting season and happily contributing to Alaska's economy.

Your hard work and careful decisions to do what's best do not go unnoticed. Thanks again and stay safe.

Michael Ellis

Camas, Washington

(C) a person that is unable to hunt a black bear in Units 1-3 and 14C (JBER) or brown bear in Unit 4, 8, 10, 14C, 22, or 26B drawing permit for the regulatory year 2019 spring season due to health mandates limiting travel, may have the permits transferred to a future spring season at the discretion of the Commissioner; this section will sunset July 1, 2023.

**WHAT SOLUTION DO YOU RECOMMEND?** 5 AAC 92.050 provides opportunities to transfer drawing permits for specific conditions. If adopted, this proposal will provide an additional opportunity to transfer drawing permits for black bear for Units 1-3 and 14C (JBER), and brown bear for Units 4, 8, 10, 14C, 22 and 26B that are unable to be hunted on due to travel related health mandates.



Submitted By  
Melissa Freels  
Submitted On  
5/27/2020 2:42:20 PM  
Affiliation

I am a wildlife enthusiast and amateur photographer writing in opposition of **Proposal 1 – 5 AAC 85.020. Seasons and bag limits for brown bear**. For the past three years, I have traveled to Katmai National Park in Alaska twice each summer to view the brown bears.

I was disappointed to recently learn of the proposal to allow a special spring season bear hunt in 2021, a move that is for the sole purpose of increasing economic opportunities for a select user group—hunting guides; the loss of revenue they cite due to COVID-19 should be addressed through state and federal business aid, not by putting the already declining brown bear population at additional risk.

Back in 1976, the alternating cycle of hunting seasons was implemented in GMU 9 because allowing two seasons in one year was resulting in overharvest; there are no current data to show that the bear population is robust enough to support multiple bear hunt seasons per year. In fact, just two years ago, the Alaska Department of Fish and Game's (ADF&G) bear biologist for the area said the brown bear population could not sustain an additional level of harvest. The biologist also cited reports dated 2013 to 2017 from area scientists, long-term guides and the public, who wondered why there seemed to be fewer bears.

Only official population surveys and monitoring taken place over a sufficient period of time will provide the scientific evidence to determine if the bear population has grown to a point where two harvests in one year would be feasible. ADF&G should not be using old data to make this determination.

In the past 45 years, there have not been any circumstances that justified allowing additional brown bear hunts, and the bear population has not been deemed healthy enough to do so. Please, do not put the brown bear population at risk to temporarily satisfy a select group. There are many of us who will continue traveling to Alaska year after year to view, enjoy and photograph the bears, bringing long-term tourism revenue to a great number of Alaska's businesses—but only if the bears are there.

Regards,

Melissa Freels (Gladstone, Oregon)

## PROPOSAL 2 - 5 AAC 92.050 Comment

Evan Gilbert <evan.l.gilbert@gmail.com>

Sat 5/23/2020 5:46 PM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

RE: PROPOSAL 2 - 5 AAC 92.050

Dear Alaska Board of Game,

Thank you for your consideration for allowing the transfer of permits as discussed in Proposal 2. As a resident of the northeastern part of the lower 48 this pandemic has been and continues to be a life altering event. While it was disappointing to not be able to hunt this spring, it was unequivocally the right decision for everyone.

I would ask to consider having the 2020 tags re-issued to 2021 and the already drawn 2021 tags moved to 2022. The 2022 spring hunts could then be excluded from the upcoming draw cycle this fall and then the following year everything would return to normal.

Again, thank you for your consideration in working to provide a solution to this unique circumstance.

Regards,

Evan Gilbert

**Richard A. Guthrie**  
Master Guide and Outfitter  
P.O. Box 220949  
Anchorage, AK 99522

May 24, 2020

State of Alaska, Board of Game

The following comments pertain to a Proposal to be considered at the special Alaska Board of Game (BOG) meeting scheduled for June 3, 2020. The Proposal would schedule a special Game Management Unit-9 (GMU-9) Brown Bear Season in May 2021 which would replace the May 2020 season that was canceled due to the COVID-19 pandemic.

Briefly, I want to reiterate my strong support for a special GMU-9 Brown Bear Season, May 10-25, 2021. Following this one time special May season, the GMU-9 Brown Bear seasons would again follow the long established alternating Regulatory Year schedule, i.e., October of odd years and May of even years. My more extensive comments contained in my Alaska BOG e-mail of April 12, 2020 are included here by reference.

Subsequent to the Alaska BOG meeting on April 14, 2020, I contacted all of my clients who had GMU-9 Brown Bear hunts scheduled for May 2020. All of these clients were, of course, disappointed that they would not be able to make their planned trip this year. However, all of the clients were understanding and supportive of the need to limit unnecessary travel to and from Alaska and particularly to rural Alaska. These clients were concerned that they might needlessly expose themselves and others to the virus and therefore supported canceling the May 2020 season. All of these clients are hoping that the remedy for their lost opportunity in May 2020 will be a special season for GMU-9 Brown Bear hunts in May 2021.

I would like to take this opportunity to thank the Alaska Department of Fish and Game and the Alaska Board of Game for addressing the issue of this lost opportunity and considering the scheduling of a special GMU-9 Brown Bear season for May 2021.

Respectfully,

Richard A. Guthrie, Master Guide #94



Submitted By  
Timothy Haberberger  
Submitted On  
5/26/2020 4:55:05 PM  
Affiliation  
Assistant Guide

Phone  
307-654-1299

Email  
[boxylodge@gmail.com](mailto:boxylodge@gmail.com)

Address  
Po Box 3149  
403 Greys River Rd  
Alpine, Wyoming 83128

I definitely support Proposal #2 for a special Brown Bear Season on the Alaskan Penninsula in May of 2021 to replace the lost opportunity this year due to Covid 19 especially since the Fish and Game see's no negative impact on the resource



May 27, 2020

To: The Alaska Board of Game

Subject: Comments on Proposal 1

The following comments on biological data derive completely from ADFG reports. Most of those reports are old but the data is still used by ADFG because there is nothing new. Some are still used to extrapolate the brown bear population estimates used for ADFG's "Neutral" position on this proposal. Others are apparently overlooked by ADFG because they contradict the proposal. And some are apparently incorrectly stated and published, in a Research Final Performance Report, by a factor of ten.

The current ADFG Brown Bear population estimate for the Alaska Peninsula is based on extrapolations of old data. There is other ADFG survey and harvest data that suggests their population estimate is high, the population declining and the harvests unsustainable. This is supported by the following information taken from ADFG reports.

Inaccurate/Unsubstantiated Population Estimate: To estimate the entire Alaska Peninsula brown bear population, ADFG uses 1 brown bear/3.5 square miles. This was first used in 2006 and has been used to extrapolate Alaska Peninsula bear population estimates for the past fourteen years. The source dates back to the Black Lake study in Unit 9E in the central Alaska Peninsula from the late 1980's. **The 30+ year-old study was based on only 1.4% of the GMU9 area.** Results from that late-1980's study were extrapolated, based on habitat, to the rest of Unit 9. **According to ADFG they are not statistically derived abundance estimates.** The 1 bear/3.5 mi<sup>2</sup> used now is based on a study of a small portion (1.4%) of GMU9 from 30+ years ago as if hunting pressures and technologies have not changed since then. The most recent five ADFG Brown Bear Management reports state that 1 brown bear/3.5 mi<sup>2</sup> derives from "**The most recent density estimates from line transect surveys flown between 1999 and 2005 in Subunits 9A, northern 9B, 9C, and 9D**". **No aerial surveys were flown in GMU subunit 9A or 9E.** There were surveys **only for northern 9B and 9D, both of which report densities well below the 3.5 bears/ mi<sup>2</sup> used by ADFG.**

Unsustainable/Over Harvest: The ADFG Brown Bear Management report for the period July 1, 1989 – June 30, 1991, prepared by ADFG biologist Richard Sellers and submitted by current Board of Game member Larry Van Daele, states "When **biannual harvests exceeded 430 brown bears in 1965-66 and 1971-72, it was necessary to curtail harvests significantly. The remedy was to use Emergency Closures** and implement short alternate-year seasons. **With those very restrictive regulations already in place and hunting pressure expanding, it must be recognized that future corrective measures will unavoidably be disruptive to the guiding industry.**" More than 430 bears harvested for the two years 1965-66 and the two years 1971-72 **amounts to a mean calendar year harvest of 215 bears, at a minimum.** Unless defined inaccurately by ADFG, harvests exceeding 215 bears per mean calendar year in those years **are directly comparable** to the calendar year harvests reported in recent years. According to ADFG records, recent reported calendar year brown bear harvests have **regularly exceeded the 215 mean calendar year harvests that previously required Emergency Closures.** Recent calendar year reported harvests are as follows: 2010 = 256, 2011 = 396, 2012 = 268, 2013 = 271, 2014 = 244, 2015 =



191, 2016 = 284, 2017 = 175, and 2018 = 275. **The average of these nine calendar year harvests is 262 bears reported killed per calendar year. That is 21% higher than the equivalent 215 bears harvested biannually in 1965-66 and 1971-72 which triggered the Emergency Closures. Yet now ADFG is “Neutral” on having three consecutive seasons – Spring 2021, Fall 2021 and Spring 2022, the opposite of the “restrictive regulations” implemented earlier.**

What Sellers and Van Daele described as “**very restrictive regulations**” in 1991, short alternate-year seasons, have been in place until now. But ADFG is now “neutral” on violating the alternate-season restriction with three consecutive seasons. And with the expanding hunting pressures they identified then certainly not having declined in the intervening years, ADFG is “neutral” about “future corrective measures” that “will unavoidably be disruptive to the guiding industry”. Instead, ADFG is now “neutral” on reducing those prior corrective measures primarily to accommodate the interests of the guiding industry.

There is no indication that the brown bear population was severely depleted prior to 1965-66 and 1971-72. Hunting pressure and poaching were lower than it is now (ADFG currently estimates 50-100 annual unreported/illegal kills in its most recent reports). Seven years earlier, a 1958 USFWS report “Alaska Brown Bear Studies”, states “**The legal harvest of bears on the Peninsula is 25 to 50 per year. Except for local situations, it is doubtful that the combined illegal and defense of property kill has significant effect on brown bear populations.**” Also, “Fragmentary data obtained from guides, taxidermists and U.S. Public Health Service, indicate that the legal harvest has not exceeded 25 to 50 bears annually in the past few years.” If the excessive number of bears killed, more than 215 per year, was a red flag in 65-66 and 71-72 it should still be a red flag now.

Unsustainable Harvest Rates: In the ADFG Brown Bear Management Report for the period July 1, 1990 – June 30, 1992, ADFG biologist Richard Sellers writes “**Using an allowable harvest rate of 5%, the annual sustainable harvest is 284 bears.** During 1987-92, the calendar year harvests have been 263, 254, 291, 269, 275, 274. It appears the regulation change implemented in 1991 **stabilized the harvest at the prescribed level.**” **ADFG currently considers 6-8% a sustainable harvest rate for GMU9 with no biological justification for the increase from 5% in 1992.** ADFG Brown Bear Management Reports show increasing annual harvest rates as follows: 92-94 = 5.3%, 94-96 = 5.5%, 96-98 = 5.4%, 98-00 = 6%, 00-02 = 6%, 02-04 = 6%, 04-06 = 6%, 06-08 = 7%, 08-10 = 7% and 10-12 = 7%. There is no similar rate provided for the 12-14 report and no reports have been produced since then.

Declining Population/Over-harvest: In the ADFG Brown Bear Management Report for the period July 1, 2012 – June 30, 2014, the most recent published, while still relying on the 1 bear/3.5mi<sup>2</sup> population density estimate from 2006, ADFG biologist Dave Crowley writes “**Unit 9 bear harvest during the reporting period was the lowest in 20 years. We suspect that a decline in adult bears occurred in Subunits 9B, 9C, and 9E. However, we cannot evaluate the extent of the decline. We therefore recommend operational planning for bears and resuming aerial surveys along traditional survey streams. These were last conducted a decade ago. One year of reduced harvest does not warrant any regulatory changes to seasons or bag limits.**” The “**Unit 9 bear harvest during the reporting period**”



which ended June 30, 2014 of RY2013, **was 513 bears, “the lowest in 20 years”**. And the decline continued.

When that report was written, one year of reduced harvest might have been a statistical outlier. But **that one year of reduced harvest is now four years of steadily declining harvest numbers, with the RY2017 harvest down 32% from RY2011**. In most other situations, ADFG would interpret such a significant and steady harvest rate decline over four regulatory years as an indication of a declining population and they would recommend actions to restore the population. **Why is ADFG now “Neutral” on having three consecutive hunting seasons – Spring 2021, Fall 2021 and Spring 2022?**

Inaccurate/Overstated Population Estimate: In the ADFG Brown Bear Management Report for the period July 1, 2002 – June 30, 2004 ADFG biologist Lem Butler writes (as did biologist Richards Sellers in the preceding report) **“A more objective test of the extrapolated density estimate for northern Unit 9B is available from the line transect surveys flown in 1999 and 2000 (Becker and Sellers in prep.). The extrapolated estimate for this area was 1 bear/7.7 mi<sup>2</sup> versus an estimate of 1 bear/10 mi<sup>2</sup> from the line transects. An additional comparison is available from Unit 9D where the extrapolated population was 900-1000 bears. Transect surveys in 2002 estimated a population of 1462.”** The **density reported here is less than half the 1 bear/3.5 mi<sup>2</sup>** applied to all of GMU9 since 2006.

In addition, the ADFG research report Brown Bear Line Transect Technique Development - Research Final Performance Report 1 July, 1999- 30 June 2003 by **Earl Becker** states “In the spring of 1999 and 2000 we surveyed northern GMU 9D using aerial line transects and **obtained estimated bear density to be 38.6 brown bears/10000 km<sup>2</sup> and 76.6 black bears/10000 km<sup>2</sup>. In the spring of 2002 we obtained an estimated 169.0 estimated the density of 169.0 brown bears/10000 km<sup>2</sup> for GMU 9D...**”. Both of these estimates for GMU 9D, at 1 bear/100 mi<sup>2</sup> and 1 bear/22.8 mi<sup>2</sup> respectively, are also significantly below the 1 bear/3.5 mi<sup>2</sup> estimate from 2006 used by ADFG for all of GMU9. **ADFG now claims the reviewed, published Earl Becker “Final Performance Report” figures were off by a factor of ten, i.e. number of bears /1,000km<sup>2</sup> instead of the published number of bears /10000km<sup>2</sup>.**

Unsubstantiated and Misleading Population Status: In Proposal 1, ADFG states “The Unit 9 bear population is regulated by **adult survival which is high. Research indicates that cub survival in Unit 9 shows no annual variation between alternating hunting years and that cub survival and litter size is related to proximity of the bear population to carrying capacity and resulting density dependent effects.**” **What GMU9 “research” supports any of this?** ADFG provides **no sources**. There have been no population studies in GMU9 in at least a decade that could substantiate high adult survival, cub survival or litter size or make any legitimate assumptions about carrying capacity. If they exist, the Board and the public should see them. Similarly, in Proposal 1 ADFG states “These bears are harvested from a **population of up to 8,000 bears on the Alaska Peninsula**”. ADFG neglects to say their 8,000 bear extrapolation, based on out-dated and insufficient research, relates to the entire Alaska Peninsula, not to those areas, covered by this proposal, that are open to brown bear hunting. They estimate that population, which they extrapolate based on the same out-dated and insufficient research, to be 6,000 bears. And neither population extrapolation is based on **“statistically derived abundance estimates”**.



Besides the above significant issues with the biological data ADFG has, or doesn't have, there are two other issues.

Abbreviated schedule for the Board of Game public process: There was no "Call for Proposals", and related substantial public input period, for the two proposals generated by the Board of Game and now under consideration. The 30-day "Call for Proposals" period for proposed regulations to be considered by the Board at their next regularly scheduled meeting in January, 2021 was extended 15 days to May 15, 2020 due to the virus. But in this case, for what are now Proposals 1 and 2, there was an email Public Notice on April 8, 2020 "that the Alaska Board of Game (Board) is calling a special meeting via teleconference on Tuesday, April 14, 2020 at 1:30 pm. The purpose of the special meeting is to develop board generated proposals on the following topics to be scheduled for board action at a subsequent, special meeting." Public comments were due to the Board by noon on April 13, 2020, **five days after the public notice, which included a three-day holiday weekend**. And no oral public testimony was taken by the Board at the meeting. Even though **Alaska Statute requires 30-days' notice for public comment prior to board action on any regulatory proposals the board may develop**, the two proposals presented by the Board at that special meeting were unanimously adopted by the Board during the special meeting on April 14, 2020. The Board scheduled another Special Meeting for June 3, 2020, with public comments due May 27, 2020 and no oral testimony to be allowed at the meeting.

The Board directed ADFG to provide "Analysis and Recommendations (A&R) relative to the proposals, to the Board and public prior to the June 3 meeting. In an April 29, 2020 email, ADFG Regional Supervisor [REDACTED] wrote "The A&R should be available approximately May 3 (approximately 30 days prior to the meeting) on the Boards Support Web Site". Responding to a subsequent email on the A&R availability, on May 7, 2020 Mr. [REDACTED] wrote "My understanding is that they are in final internal review and should be posted soon. With the abbreviated schedule for this meeting and many staff teleworking the process is a bit complicated." ADFG posted their Analysis and Recommendations, in Proposal format, on May 13, 2020, **fourteen days** prior to the public comment deadline. Why the abbreviated schedule? It could be extended for weeks if not months. The proposal would not be effective until Spring 2021. And the Board/ADFG can always implement emergency openings or closures of seasons anywhere the state. The Board should provide a valid explanation. Lacking that, perhaps the "abbreviated schedule" is partly because the term for the Board Chair, Ted Spraker, is expiring effective the end of June and this is something he wanted to finish. If true it is not a valid reason to curtail public input. There is perhaps another motivation for the rush, unrelated to any administrative or biological considerations.

Motivation for GMU 9 Proposal (Proposal 1): From many of the comments received for the Board's April 14, 2020 special meeting, it is obvious a large part of the motivation was money. The majority of bears killed on the Alaska Peninsula are killed by non-residents required to have a guide. When ADFG closed the Spring 2020 season to non-residents, professional guides had a lot of cancellations. Indeed all visitor and travel-related businesses in Alaska, and elsewhere, have regrettably experienced substantial cancellations and economic loss. But, in addition to the Federal and State aid available to all virus-affected businesses, the professional hunting guide industry wanted more, a "do-over", something not available to other businesses: a special, additional season, on top of the Federal and State financial relief



opportunities for which they qualify (and for which they will still qualify if Proposal 1 is approved). This motivation is perhaps best summed up by these excerpted comments to the Board of Game from the Alaska Professional Hunters Association (APHA):

“APHA represents Alaskan hunting guides and their small businesses, many of whom have been severely hurt by the need to close spring non-resident bear seasons in 2019.”

“APHA supports the following alternatives because they will result in capturing what otherwise would be forgone economic opportunity...”.

“We cannot emphasize [sic] enough the economic necessity of working to adjust seasons to recapture lost economic activity from hunting during the spring 2020 seasons. Hunting guides own and operate small businesses some of whom rely wholly on bear hunts for business viability.”

“Our members are currently holding a significant amount of client deposits or full hunt payments that may become a liability if seasons are not closed and then not moved to alternative dates. The cascading effect of guide liability for un-prosecuted hunts combined revenue loss and no-recapture of opportunity would be catastrophic.”

As the Board knows, similar comments were submitted by various Master Guides, Registered Guides, hunting lodges, outfitters, employees and individuals. There is no doubt the travel restrictions have hurt all of these just as they have hurt everyone else. Nothing will make everyone whole when restrictions are eased or lifted but there are Federal and State programs in place, and in preparation, to make up some of the losses. It is not the responsibility or authority of the Board or ADFG to make up for the unfortunate unexpected financial losses of any resource users, resident or non-resident. There are other avenues to do that through State and Federal assistance programs. There are always risks in any business. Many of them, like the present pandemic or severe weather and other natural disasters, are unfortunately out of anyone’s control. The problem is not unique to the professional hunting industry. They shouldn’t be asking for unique, special assistance and, instead, attempt to deal with it like everyone else.

**Conclusion/Recommendation:** Given 1) the lack of ADFG information to support their estimated GMU9 Brown Bear density and population, 2) ADFG information which indicates a significantly less dense population, 3) ADFG data which indicates a declining population, 4) harvest levels well above those which previously triggered Emergency Closures, 5) the abbreviated public comment schedule for this approval process and 6) the inappropriate financial consideration requested by, and provided to, the professional hunting industry, **Proposal 1 should be rejected. To the contrary, given the likely declining population status and trend of GMU9 brown bears, consideration should instead be given to reducing or closing GMU9 seasons in Fall 2021 and Spring 2022 to allow those brown bear populations to recover.**

Submitted by: Wayne Hall

Anchorage

## Proposal 5AAC 85.020

Bruce Hallingstad <becharoflodge@icloud.com>

Tue 5/26/2020 3:19 PM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

My name is Bruce Hallingstad. I have been a registered guide with the state since 1999.

"GUIR 1005" I liv in Egegik, Alaska for 6 months a year.

I just wanted to comment on one of the proposals coming up at your meeting on June 3rd "5 AAC 85.020"

This concerns opening up a special Brown Bear season to residents and nonresidents in the spring of 2021.

Not having a spring bear hunt in unit 9E this year has been a financial burden on my guide business of over 20 years. It is very difficult and expensive to book hunters for our hunts. My customers have trusted us to give them a good hunt this year. They have paid large sums of money ( deposits, airfares, special equipment ect..) to come on this is hunt.

I myself have paid large sums of money (doing sports shows, advertising,insurance, land use fees, licenses, new equipment ect...) to be ready for the spring hunt 2020.

This last season (Fall 2019) we had 7days taken out of the Peninsula bear hunts. unit 9E. This limited us to half the amount of hunters we could take.

Bear hunting accounts for over half my yearly income. I do understand there are loans available for some of us. I myself don't want to borrow any money from the state or government. My life has been surrounded by hunting. I don't normally ask for extra help. I'm am asking Now. NOT in a loan program, but in moving the bear season back to spring 2021.

This should not disrupt the cycle that guides & hunters on the Penninsula have lived with for over 30 years.

Even though there is a resident only season going on this May. With all the air closures, village closures there will only be a few bears taken at most. Brown bears are not wanted by the residents as a food source. Most are killed by non residents hunting with state licensed guides.

I have talked to my hunters and they are all willing to put their hunt off until spring 2021. That would still allow us to book hunters for fall 2021. Without too much hardship. I don't believe this change would hurt the bear populations on the peninsula. This would also be good for the small towns & villages that have shut down their boarders to outsiders because of the virus that has threatened & changed the lives of most all of us. This doesn't just affect us guides. We all employe help & use local services (Assistant Guides, air charters, lodging, hotels, grocery stores, sporting goods, ect) also State fees, village trespassing fees, BLM permits ect...

I appreciate you taking the time to read this letter. Thank you for considering these changes. Bruce Hallingstad

PS Please feel free to call me if I can help out or answer any questions. [208-337-8211](tel:208-337-8211)

Sent from Bruce @ Becharof Lodge

Sent from Bruce @ Becharof Lodge

Submitted By  
Drew Hamilton  
Submitted On  
5/27/2020 4:57:19 PM  
Affiliation  
Friends of McNeil River

regarding PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear

I am writing to express concern over both the motivation behind and process by which this proposal is being considered.

It appears the pandemic that is the root problem of this proposal is far from over and to be attempting to take mitigation efforts without a better understanding of what the future might hold is a waste of all of our time and energy.

Since data are not yet available from the spring hunt this year that was cancelled and then uncanceled it seems premature to be adding hunts to the calendar without understanding the realities of the hunts that have already happened. Especially when this appears to be at the direct request of guides looking for economic opportunities and has the potential take opportunities from other users and redirect them towards extractive industries. Pandemic related economic mitigation is not the responsibility of the Board.

The reasons the alternating hunting seasons were adopted are still valid and recent concerns regarding overharvest should mandate highly conservative management for unit 9 bears. While other units don't necessarily have the same competition for resources unit 9 bears represent a shared resource between the subsistence users, guided hunting, and viewing industries. Failure to strike a balance vacates the Board's mandate to manage game for all Alaskans. Management actions must be based on science and reality.

Given the lack of recent hunt data and uncertainty the next few months hold the board should not be considering adding hunts at this time.



## Comments on Proposal 1-5AAC 85.020

skhansen@ak.net <skhansen@ak.net>

Wed 5/27/2020 5:14 PM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

To the Alaska Board of Game

Regarding your proposal 1-5AAC85.020 to add another spring hunt for Alaska Brown Bears in the year 2021.

I am a resident of Fairbanks, Alaska. But I have worked as a ranger-naturalist in Katmai National Park and have met with visitors from around the world and the USA who have come to Alaska Peninsula to view wildlife and to particularly view Brown bears.

I do not agree with this proposal for a number of reasons.

1. ADF&G does NOT have current surveys of the population of brown bears in Game unit 9.
2. Brown bear populations have been in decline in that area since 2000.
3. Brown bears reproduce slowly. Females do not reproduce until after 5 years old. They may have 1-4 cubs. But not normally more than 2. Only half of these cubs survive.
4. Brown bears in Alaska Peninsula are a National and world wide Treasure. They attract visitors from all over the world and the USA. These visitors contribute economically to the state of Alaska far more than hunting guides, hunters or trappers.
5. Your proposal supports only one user group--hunters, guides and trappers. Your proposal will reduce the number of brown bears negatively affecting the brown bear population and negatively affecting other user groups--wildlife viewers, photographers, tourists, businesses that depend on visitors coming to view brown bears.
6. You have no scientific facts to back up this additional hunt . You have no recent population survey of brown bears in GMU 9. So you have no way to judge whether you will harm the brown bear population and you have no way to show that you will be able to sustain the brown bear population.

You have to use current and accurate survey work on the brown bear population before you make additional hunting proposals for these brown bears. You do not have scientific back up for this proposal,.

These are my comments.

Susan Hansen  
PO Box 81967  
Fairbanks, Alaska 99708

(818) 614-2734



physical address (no mail is received here):  
3104 Bunchberry Lane  
Fairbanks, Alaska 99709

## Board of Game Special Meeting June 3, 2020 Written Comments

Jim and Cathy Hodge <cnjhodgesoutfitters@gci.net>

Sat 5/23/2020 11:54 AM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

To Alaska Board of Game:

I would like to start out by saying I hope this finds everyone safe and healthy. I sincerely appreciate the use of your valuable time to this matter. I also appreciate the time and consideration that is being given by the Alaska

Department of Fish and Game to the cancellation of the 2020 Spring non-resident Kodiak Brown bear season.

2.) Modify 5 AAC 92.050(6) to allow the transfer of 2020 spring season drawing permits to a future year for hunting black bear in GMUs 1-3, and brown and grizzly bear in GMUs 4, 8, 10, 14C, 22, and 26B.

I would like to suggest rolling the 2020 non-resident Spring bear tags for Kodiak/Afognak over to Spring of 2021. As I am sure you all must know, these tags are a once in a lifetime draw for many of the non-resident permit holders. I would like to be able to give non-resident clients hope that their dream of actually having drawn be rewarded.

I know my following suggestion is not going to be taken up at this meeting. However, I feel it should be considered for further discussion.

The Fall of 2020 would be a good time for non-residents to put in for the Spring 2022 drawing. The same way it is done for resident hunters. And of course they would also be putting in for the Fall hunts of 2021. The current drawing situation is non-residents put in for the Spring bear hunt in December of the year previous to the hunt. And they are notified of a successful draw in February barely over 1 month prior to their hunt. Non-residents have to arrange travel to Alaska and accommodations in less than one month.

Additionally, the non-resident Kodiak Brown bear alternate list is not made public until a few weeks after the drawing. The non-residents who end up with a permit on the alternate list have even less time to plan a hunting trip to Alaska. Having the draw a year in advance will allow those that drew a permit and those chosen from the alternate list time to plan for their hunt.

If you need any clarification as to my recommendations, please feel free to contact me. I have discussed this at length with [REDACTED] and [REDACTED] of Fish and Game in Kodiak.

Thank you for considering my suggestions.

Sincerely-

Jim Hodge

Hodge's Outfitters  
13836 Lake Otis Pkwy  
Anchorage AK 99516  
[cnjhodgesoutfitters@gci.net](mailto:cnjhodgesoutfitters@gci.net)

hodesoutfitters.com  
907-349-0520





## Proposal 1: GMU 9 brown bear hunt for resident and nonresident permittees of the 2020 spring registration hunt for Spring 2021

Marilyn <lostinspace@matnet.com>

Wed 5/27/2020 8:08 PM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

To the Board of Game:

The Alaska Department of Fish and Game justification for Proposal 1 to allow a GMU 9 brown bear hunt for resident and nonresident permittees of the 2020 spring registration hunt to carry forward to spring 2021 has not convinced me of the necessity of this change proposed by the Board of Game. ADFG appears unconvinced as well given the NEUTRAL position taken by the department.

I am opposed to the Board of Game proposal. There is no biological necessity for this action. If anything, reduced or no hunting in two spring seasons would provide a break for the brown bear population, thereby presenting the opportunity for more hunter success in spring 2022. Adult males that are not killed in spring 2021 will be older and larger in the next regulatory year.

It is worth noting that more than 50% of the comments supporting the carrying forward of the permits are from guides and outfitters. These individuals are reaping the benefits from federal financial assistance programs AND this proposed additional spring season. In this time of COVID-19 when selflessness should reign supreme, it is not surprising that guides and outfitters are jumping at the opportunity to double or triple dip. It is clear the BOG is acting in an advocacy role for professional guides and outfitters, which is NOT part of their mandate. It is also noteworthy ADFG makes absolutely NO mention of the influence of guides and outfitters (and their clamoring for the change) in their comments.

Marilyn Houser  
Anchorage



Submitted By  
Judy Kimminau  
Submitted On  
5/24/2020 5:26:43 AM  
Affiliation

Regarding, PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear, I am writing to urge you not to allow the additional hunt. I understand that some people rely on the tourism dollars of these hunts but, I have been to AK FIVE times and plan to keep coming solely to see these animals. If you keep catering to a small group of rich trophy hunters you will lose ongoing revenue from tourists like me and eventually the hunters. I have seen guides walk hunters right up to an animal, is this really hunting? Please don't do this, everyone was hit financially in this pandemic, decimating your grizzly population isn't the answer.

## Board of Game: Comments for June 3 Meeting

Butch King <gwkjr@icloud.com>

Tue 5/26/2020 12:20 PM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

Comments In SUPPORT OF PROPOSAL 2:

Open a Special 2021 Spring Brown Bear Season in GMU 9 to replace lost opportunity to hunt brown bear in May 2020 due hunting closure because of COVID-19 Pandemic.

I urge all Board of Game members to support this proposal. I agree that biological and traditional harvest data supports providing sportsmen with this replacement opportunity to participate on a Spring 2021 brown bear hunt on the Alaska Peninsula.

The untimely closure of the 2020 spring bear season through out Alaska has impacted many sportsmen globally and many guide/outfitters statewide. In most cases, these hunters will agree to postpone a year, to the next spring season and outfitters will recover quickly, BUT NOT SO in GMU 9, the Alaska Peninsula where the next schedule spring bear hunt is not until May 2022. Most clients understand postponing a year, due to Covid-19, but many who booked this hunt two or more years ago, simply can not wait two more years to hunt the Peninsula. This 2021 season is very important for many reasons.

Again, the biology and traditional harvest data support a special season in May of 2021. The net harvest during this proposed season will only replace that which was not take in May of 2020. Fish & Game has no objections, no additional costs.

Positive effects include: The age profile of the population has been further enhanced by this one year delay as well as pregnancy rates and numbers of breeding bears. All point to a stronger bear population. Secondly, in light of depressed State economic conditions, post COVID-19, this special season will greatly enhance tourism and increase employment in Alaska as well as commerce for depressed air carriers, and providers of supplies, fuel and hunt gear, not to mention the sale of licenses and tags.

There are several excellent reasons for supporting this one time special season and no good reasons I can see for not. Please give this proposal your affirmative vote.

Respectfully Submitted,

Gary "Butch" King, Jr.  
Alaska Master a Guide #97  
Wildman Lake Lodge - Alaska  
Email: butch@wildmanlodge.com

Butch

Submitted By  
Kathleen King  
Submitted On  
5/26/2020 2:37:42 PM  
Affiliation

Phone  
8305224947

Email  
[Ktmk1960@gmail.com](mailto:Ktmk1960@gmail.com)

Address  
2024 Stonegate Circle  
Anchorage, Alaska 99515

I urge all board members to support Proposal #2 - to establish a Special Brown Bear Season in GMU 9 for May of 2021. Covid-19 took away the 2020 May season, which is an every-other-year spring brown bear hunt on the Alaska Peninsula. Many hunters have planned for several years to participate on this hunt, only to have their plans duped by the Corona Virus. This was not only unfair to them, but unfair to ALASKA, which was duped out of Millions of dollars in tourism revenue! License fees and employment opportunity, right when we need it the worst. The only ones that benefited was the bears. The result as little or no harvest in 2020, older and bigger bear being added to the population and a higher pregnancy rate among the female bear population, which will all be with cubs in the spring of 2021, further saving them from hunters that, if not with cub, could confuse them with a legal single bear. ADFG has no problem with the Peninsula bear numbers and see this as a neutral move. Harvest data from many years confirms that 85% male trophy bear are taken on Spring hunts in GMU 9. A YES vote by the BOG for a Spring 2021 bear season in Unit 9 would go a long way toward helping a lot of folks in their recovery from the COVID-19 Pandemic, without jeopardizing our precious bear resource on the Alaska Peninsula. Kathy King - Born in Fairbanks



Submitted By  
THOMAS KIRSTEIN  
Submitted On  
5/27/2020 1:08:58 PM  
Affiliation  
Professional Kodiak Guide

Phone  
9073888667  
Email  
[tomkirstein@ak.net](mailto:tomkirstein@ak.net)  
Address  
PO BOX 83808  
FAIRBANKS, Alaska 99708

May 27, 2020

Board of Game

Special Meeting, Proposal #2, 5AAC 92.050

Dear Board of Game,

Chairman Spraker and Board Members,

I want to thank you for holding this special meeting to deal with the spring bear hunting from southeast to western Alaska for both resident and non-resident hunters. I would ask that you pass these proposals to allow the spring lost hunting opportunities from 2020 to be offered in future years.

I own and operate a bear camp on Kodiak Island, and like others have been directly impacted by the government shutdown this spring not being able to provide the bear hunting adventures as planned. The Board's action to pass these proposals if taken should send a strong message to give guidance to the Fish and Game Department game managers to come up with solutions to allow for future hunting opportunity without net loss to both resident and non-resident hunters alike. Kodiak Island is unique with its permit system for bear management. For that same reason this proposal allows for the Game Department multiple years to consider how to offer these limited permits. This proposal is the foundation for the department to provide for hunting opportunity in future years if so chosen to work through the allocation process. The result of little to no bear harvest in most of Kodiak Island hunt units from this 2020 spring season will be unused harvestable surplus which supports hunting opportunity in future years.

Thank you for your consideration of these proposals and my comments. I appreciate and give thanks for your service as board members to the Board of Game of Alaska!

Sincerely,

Tom Kirstein

Alaska Master Guide #98



# Katmai Guide Service

JOE KLUTSCH, MASTER GUIDE

May 25, 2020

From: Joe Klutsch  
P.O. Box 313  
King Salmon, Alaska 99613

To: Alaska Board of Game  
P.O. Box 115526  
Juneau, Alaska 99811-5526  
[www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)

Members of the Alaska Board of Game:

I am submitting this letter to address proposals as follows:

- 1.) Open a spring 2021, resident and nonresident Brown Bear hunting season in Game Management Unit (GMU) 9 under 5 AAC 85.020

This proposal would help rectify issues related to the Corona Virus which prevented hunting this spring. The economic set backs have been severe for most hunting guides. Residents were able to hunt but the level of effort was lower than I have ever witnessed as a resident of King Salmon in over forty years. King Salmon is the demarcation point for nearly all resident and nonresident hunters to the Alaska Peninsula.

In 2019, the BOG adopted season reductions to address conservation concerns regarding age class of bears being harvested. Based on over 45 years of participation in Unit 9 hunting I supported this action as an alternative to the permit drawing proposal for portions Unit 9 E which was primarily based on conflict in the field issues on State lands.

The Board's action to shorten the seasons to reduce harvest are in effect therefore, allowing for a season change to the spring of 2021 should have no negative biological impact on the Bear population. Additionally, females five years or older who are available to breed and may have been otherwise harvested will produce additional Bears.

Hunters who have long awaited the opportunity to hunt these great Bears are the direct beneficiaries of Alaska's management programs and will not be unnecessarily let down. The reputation of Alaska as one of, if not





page 2

the best wilderness hunting destination in the world will remain.

Residents who had the opportunity to hunt this spring and were not successful will have the opportunity to hunt next spring and nonresidents who could not hunt this spring will be able to participate next spring.

Reccomend adopt Proposal.

2.) Modify 5AAC 92.050(6) to allow the transfer of 2020 spring season drawing permits to a future year for hunting black bear in GMUs 1-3, and brown and grizzly bear in GMUs 4, 8, 10, 14C, 22, and 26B.

My comments are directed toward GMU 8 however they may be applied as they apply to the other GMUs.

In nearly all of the Kodiak drawing areas Bear populations are stable at management objective as outlined in the Brown Bear management plan. Absent femal harvest (5 years or older) that may have been harvested this spring by residents and nonresident there will be additional bears in years to come.

Bear hunting that was eliminated this spring could be "trickled" in over the next three spring cycles without deviating from acceptable long term harvest objectives and be consistent with the Kodiak Brown Bear management plan. The concept of protracting or "trickle in" hunters over a three year period is aimed at insuring a measured level of effort, allowing for quality of experience and providing for resident and nonresident opportuniy.

Once again, the same rationale that applies to the GMU 9 can apply in GMU 8. The difference here is that it will take a real commitment on the part of the Department to make this happen. ADF&G staff have the capability to make this happen if they have the will and are so directed. The key factors to consider are conservation and health of the species. Nothing in this proposal jeopardizes this objective.

Please consider that current permit drawing holders should be allocated the same opportunity for 2021. Licence and and tag fees paid to date should be honored.



page 3

My last request is that You don't over think this. Academics  
is fundamental - Action is esential.

Respectfully,

Joe Klutsch

Submitted By  
GRANT KOPPLIN  
Submitted On  
4/30/2020 10:38:48 AM  
Affiliation  
hunter

Phone  
9077444783

Email  
[kopplin12@live.com](mailto:kopplin12@live.com)

Address  
12440 E Kalwies Ln  
Palmer, Alaska 99645-9034

im commenting on proposal 2 for the spring bear meeting. i am writing in support of moving the spring 2020 bear hunts that were missed due to COVID to another year. i think the best thing to do would be move the spring 2020 hunts to 2021, and the current tag holders that were just drawn for the 2021 hunts will be moved to 2022. with that being said the 2022 spring draws for these hunts would just be eliminated for that year. this way everyone who has drawn a tag already gets to hunt that tag and it doesnt produce a season where their is poteintially double the amount of tag holders afield. i currently hold a tag for unit 8 in spring of 2021, and while it isnt ideal to be pushed back another season i think this would be the most fair option for the people who couldnt hunt this year due to covid and since the spring 2021 hunt is still pretty far away it should be less of an inconvenience to push our hunts back another year. thanks for your time and consideration

Submitted By  
Lance & Nikki Kronberger  
Submitted On  
5/13/2020 11:27:07 PM  
Affiliation  
  
Phone  
9076220630  
Email  
[FreelanceOA@mac.com](mailto:FreelanceOA@mac.com)  
Address  
4005 Delores Drive  
Eagle River,, Alaska 99577

## **Proposal 1**

**May 10, 2020**

### **BOG Special Meeting Regarding Spring Bear Hunts - June 03, 2020 - Comments**

To whom it may concern,

As a master guide who has been participating in Alaska Peninsula Brown Bear hunts since 1998, I am in full support of Proposal 1. Although there will be some resident harvest in the spring of 2020, I believe the resident harvest of spring 2021 will be much less than resident harvest in recent years. Allowing a 2020 resident spring season and a 2021 resident & non-resident spring season (both spring seasons being 6 days shorter than 2018), should equate to a very similar harvest of the 2018 spring Brown Bear season.

I recommend that if a resident did receive a registration unit 9 brown bear permit for 2020, then that should exclude them from being able to obtain a registration unit 9 brown bear permit in 2021. Whether they were successful or not.

I have also heard talk of trying to restrict the guides to only be able to conduct hunts with hunters that were booked for 2020. While I support this in theory, I believe this is very hard to mandate as unit 9 does not require guide-client agreements and our financial contracts for 2020 hunts are now void. Most of the spring hunting on the Alaska Peninsula takes place on federal lands where guides are already limited by the number of hunts they can conduct. With this limit already in place, along with the uncertainty in the world, I do not believe the extra year will put increased pressure on the resource from guided hunters.

In closing I would also ask the BOG to allow hunters that have purchased 2020 brown bear locking tags to be able to use them in 2021, or allow them to exchange them for a refund or a 2021 brown bear locking tag.

Thank you so much for taking the time to try and help hunters and guides from all over the world recapture the lost opportunity from the 2020 spring closure. I think we all need to get out in the field more than anyone knows.

Lance Kronberger  
Freelance Outdoor Adventures  
Master Guide – 221  
Eagle River, Alaska

## **Proposal 2**

*May 10, 2020*



To whom it may concern:

*As a resident hunter and guide, I am very pleased with Proposal 2. The 2020 spring bear season setbacks were very devastating to all hunters (residents & non-residents) who had been planning for their Spring 2020 Kodiak Brown Bear hunts. Many of these hunts being a once-in-a-lifetime experience.*

*After researching many different options, I believe there is a way to allow the displaced hunters who missed out on their once-in-a-lifetime experience to be able to hunt Kodiak.*

*I know there were residents who had the opportunity to hunt their 2020 Kodiak Spring Brown Bear permits. This is a real positive as the number of permit hunts that would need to be re-issued in future years is reduced.*

*My recommendation is the spring 2020 resident and non-resident permits that were not used should be reissued over the next three spring Kodiak seasons. In virtually all the Kodiak permit areas this would mean there would never be more than (3) additional permits per hunt area for the next three spring hunt periods. With the greatly reduced number of bears harvested in spring 2020 these additional permits over the next three spring seasons would have no effect on harvest objectives. The total number of permits issued would be the same, thus the same net harvest.*

*As far as overcrowding/quality of experience, this also should not be a factor in most areas. Kodiak has a 45-day spring season and the average days hunted by our hunters in the prior three spring Kodiak bear seasons is less than 6 days. Thus, the quality of experience should still be very high.*

*The process of re-issuing the hunt permits is something that can be done by the area biologist or a small committee working with the area biologist. Once the 2020 spring permit participation is established, then it will be known the number of permits that need to be re-issued over the next three spring seasons for each hunt area. The area biologist and/or committee, can randomly issue the permitted hunters equally over the next three spring hunt periods. When re-issuing the permit timeframes, they will divide them equally between resident and non-resident, unless there is an odd numbered number of permits, in that case the resident permits will get preference until they are all issued, and at that point then the remaining non-resident permits will be issued.*

*I encourage the board to take a long hard look at possible ways to reissue the permits that were lost during the 2020 spring season. The hunter opportunity for this very special resource can be reissued without any biological concerns for the resource. The loss and disappointment of not being able to hunt this past spring was hard on all the hunters that had been planning their hunts over the winter. I know it will take a little time and effort from the department to work to re-issue these permits, but under the circumstances I think we are all willing to put in some extra time and effort for all hunters.*

*I really appreciate the time and effort the Board of Game has put into these proposals to try and help the hunting community during these crazy times. Your effort and dedication has not gone unnoticed.*

**Lance Kronberger**

**Freelance Outdoor Adventures**

**Master Guide #221**

**Eagle River, AK**



Submitted By  
Lee Ann Lentner  
Submitted On  
5/26/2020 1:50:20 AM  
Affiliation

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#### PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear

- Hunting of brown bears in GMU 9 occurs in the spring and fall, but in alternating years (spring hunting season in even years; fall hunting season in odd years). **This alternating cycle of hunting seasons has been in effect in GMU 9 since 1976 because having two hunting seasons each year was resulting in overharvest and wasn't sustainable for the bear population.**
- There have been no instances in almost 45 years in which multiple hunting seasons per year were authorized because the bear population has not been robust enough to support multiple seasons per year. **There are no data to show that the situation has changed** and that adding a spring 2021 season would not result in overharvest.
- Just two years ago at the Board of Game meeting, during a discussion by the Board of whether or not to add a resident-only early season hunt in GMU 9, **Alaska Department of Fish & Game's (ADF&G) bear biologist for GMU 9 said the brown bear population could not sustain an additional level of harvest, even the comparatively low level of harvest by residents** (which is only about 25% of the total annual harvest of brown bears in GMU 9).
- **THE TRUE STATUS OF BROWN BEARS IS UNKNOWN AND DECISIONS ARE BASED ON INADEQUATE DATA.**
- Surprisingly, ADF&G does not routinely monitor the population of brown bears in GMU 9. They haven't conducted transect surveys to count bears in GMU 9 since the mid 2000s and have **no plans to conduct any abundance surveys in the foreseeable future.**
  - This means that the **management decisions about how many bears can be harvested are not based on scientific studies** of the wild population, but rather are based on the numbers of hunters who report killing a bear.
  - Since ADF&G has no plans to survey the population, **they won't be able to know until it's too late if too many bears were killed** as a result of three consecutive hunting seasons in a row for the population to maintain long-term viability.
  - ADF&G's bear biologist for GMU 9 has recently expressed concerns to the Board of Game that the **population of brown bears in GMU 9 has been declining since the 2000s**, and from 2013-2017, he received numerous reports from area scientists, long-term guides, and the public asking **"Where's the bears?"** because they weren't seeing them like they used to.
    - In 2018 ADF&G reported that **an entire cohort (age class) of young bears was lost** due to a longer spring hunt in 2013 and severe weather events in winter 2011/2012 and 2012/2013. This loss is in addition to the long-term decline in bear numbers.
    - The total number of bears harvested in the last decade was notably less than previous decades, which is a sign of concern for the population.
    - During the 2018 Board of Game meeting this was theorized to be **the result of the inability of hunters to find bears because there were fewer bears to find** (and not a reduction in the desire to hunt brown bears).
  - ADF&G continues to claim there are "up to 8,000 bears" in GMU 9 based on extrapolations from data collected between 1999 and 2005, despite some of their other reports suggesting the estimate is too high.
    - The latest population data 15-20 years old, **it can no longer be deemed a reliable estimate of the number of brown bears in GMU 9**, especially when ADF&G indicates the population has been declining since the 2000s.
    - Management decisions that result in removing animals from a population **should not be based on the maximum estimate of animals in the population, but rather should be based on the minimum number of animals in the population.** That way you don't remove too many animals from the population, and don't risk jeopardizing the sustainability of the population.





- The age and size of hunted bears increased in the past decade as compared to previous decades, meaning **more older “trophy-sized” bears of both sexes are being killed in recent years, and fewer younger animals are being killed.**
  - Recognizing the concern with “mining” out the big bears, during the 2018 Board of Game meeting, the Board members voted to reduce the spring brown bear hunt by one week. **There has not been sufficient time, or population monitoring, to know if these strategies were successful.**
  -

please protect these bears and do not allow over hunting due to pressures from guides. The extra hunt could be devastating to the population. Please consider this in your decision

thank you

## Proposed Changes to Non Resident Bear Seasons

Dave Leonard <mountainmonarchsofalaska@gmail.com>

Wed 5/27/2020 10:40 AM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

Dear Mr. Chairman and Members of the Board,

I hope each of you have stayed healthy through this pandemic ,thus far.

As a long time established Master Guide & Outfitter this has been the strangest Spring, and not being out in the field with Non resident Bear clients. I might add, my first in 43 years.

While I agreed with the closure of the season for non residents I have to say that there were those residents ,and I won't mention any names, that broke the travel mandates and entered isolated villages for Av Gas and support while exercising the privilege of Bear hunting this Spring. We are in this together and I am disappointed in this sort of irresponsible behaviour, but I have to say that I expected it. I just hope no hunters brought sickness into any isolated village. Especially while guides were sidelined.

This has been very tough on tourism and our guiding business's. Our clients that were booked have been understanding of the situation with the closure of Spring Bear season to non residents.

I am, we are, asking you as a board to do the right thing and roll the season over to May 2021 as previously recommended.

Followed by a season in Oct. 2021 and then the Spring of 2022 and back to the normal closed season for 18 months before the next season.

Thank you for the opportunity to express my comments. I have confidence in your decision making.

Respectfully Yours,

Dave Leonard

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***Dave Leonard***

Master Guide #81

Mountain Monarchs of Alaska LLC

907-252-4952

Submitted By  
Derek Lewis  
Submitted On  
4/30/2020 2:11:30 PM  
Affiliation

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I am in support of the following proposal: 1) Allow the transfer of spring season drawing hunt permits to a future year for black bear hunts in Game Management Units (GMUs) 1-3 and 14C (Joint Base Elmendorf Richardson), and brown and grizzly bear hunts in GMUs 4, 8, 10, 14C, 22, and 26B.

As a resident and permit holder for unit 8 in 2020, I would support the transfer of spring season drawing hunts to a later year. Since the 2021 spring draw hunts have already been awarded, I would support the transfer of 2020 hunts to 2022 spring period rather than simply negating those individuals opportunity to use that tag, and for some folks after years of applying unsuccessfully

## Proposal 2 (Transfer of Spring season 2020 bear tags)

jim lundberg <jflundberg@gmail.com>

Mon 4/27/2020 10:06 AM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

My comment is in favor of the proposed regulation (Proposal 2). I was successful in drawing a 2020 spring bear tag for Unit 2 and had booked all my flights and other accommodations for an early May 2020 hunt. After Alaska Fish and Game cancelled non-resident spring bear hunts for May 2020, I was only able to receive a credit for the flights and accommodation bookings. Given the time frame requirements for applying for a new tag, I will lose the booking credits and all the cost for the bear hunt unless I am able to transfer the tag to 2021. Allowing a transfer of the tag to next season will allow me to use the credit for the flights and other accommodations.

Thanks for you consideration and efforts.

Jim Lundberg

505 S. 1560 E.

Mapleton, Utah 84664

Submitted By  
Joel McCaw  
Submitted On  
4/23/2020 4:56:17 AM  
Affiliation

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Iowa City, Iowa 52245

I am in favor of proposal 2) Opening a special spring season for brown bear hunts in GMU 9 (Alaska Peninsula) in 2021.

I currently hold a spring (2020) brown bear permit in this area, and the strongly wish to come and complete my hunt in spring 2021.

Thank you for your consideration!

Submitted By  
Ryan d. McCue  
Submitted On  
5/26/2020 9:55:52 PM  
Affiliation  
Master Guide #210

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Comments in support of proposal 2: Open a Special 2021 Spring Brown Bear Season in GMU 9 to replace 2020 Spring Brown Bear hunt closure due to Covid-19 Pandemic.

I support this 'proposal 2' fully. It is necessary to provide another season which will replace the May 2020 closure as soon as possible. Proposal number 2 will best mitigate the negative economic impact on countless commercial services involved in this particular hunt on the Alaska Peninsula. It will also most closely accommodate the many sportsmen who have contracted hunts on the Alaska Peninsula. The biological impacts of an 'added' spring brown bear season in May 2021 will be negligible; as the 2021 harvest consequence would be offset by this current extended period of harvest closure. The positive aspects of 'proposal number 2' will far outweigh any detriment to a very strong resource.

Please support Proposal 2,

Ryan d. McCue. Master Guide #210 RdM Pilot/Guide, Ltd.



## “PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear.”

Margaret McGinnis <margaretmcginnis@verizon.net>

Sun 5/24/2020 6:04 AM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

I am writing to express my opposition to the Spring 2021 Bear Hunt in Unit 9 for the following reasons:

Hunting of brown bears in GMU 9 occurs in the spring and fall, but in alternating years (spring hunting season in even years; fall hunting season in odd years). **This alternating cycle of hunting seasons has been in effect in GMU 9 since 1976 because having two hunting seasons each year was resulting in overharvest and wasn't sustainable for the bear population.**

There have been no instances in almost 45 years in which multiple hunting seasons per year were authorized because the bear population has not been robust enough to support multiple seasons per year. **There are no data to show that the situation has changed** and that adding a spring 2021 season would not result in overharvest.

Just two years ago at the Board of Game meeting, during a discussion by the Board of whether or not to add a resident-only early season hunt in GMU 9, **Alaska Department of Fish & Game's (ADF&G) bear biologist for GMU 9 said the brown bear population could not sustain an additional level of harvest, even the comparatively low level of harvest by residents** (which is only about 25% of the total annual harvest of brown bears in GMU 9).

**This is not a subsistence issue.** Some subunits in Unit 9 allow for year-round resident near-village and subsistence hunts, the only hunts that allow a bear to be taken any time of the year. The status of these subsistence hunts are not impacted by this proposal.

Bear populations are not routinely in GMU 9. ADF&G hasn't conducted transect surveys to count bears in GMU 9 since the mid 2000s and has **no plans to conduct any abundance surveys in the foreseeable future.**

This means that the **management decisions about how many bears can be harvested are not based on scientific studies** of the wild population, but rather are based on the numbers of hunters who report killing a bear.

Since ADF&G has no plans to survey the population, **they won't be able to know until it's too late if too many bears were killed** as a result of three consecutive hunting seasons in a row for the population to maintain long-term viability.

ADF&G's bear biologist for GMU 9 has recently expressed concerns to the Board of Game that the **population of brown bears in GMU 9 has been declining since the 2000s**, and from 2013-2017, he received numerous reports from area scientists, long-term guides, and the public asking **“Where's the bears?”** because they weren't seeing them like they used to.

In 2018 ADF&G reported that **an entire cohort (age class) of young bears was lost** due to a longer spring hunt in 2013 and severe weather events in winter 2011/2012 and 2012/2013. This loss is in addition to the long-term decline in bear numbers.



The total number of bears harvested in the last decade was notably less than previous decades, which is a sign of concern for the population.

During the 2018 Board of Game meeting this was theorized to be **the result of the inability of hunters to find bears because there were fewer bears to find** (and not a reduction in the desire to hunt brown bears).

ADF&G continues to claim there are “up to 8,000 bears” in GMU 9 based on extrapolations from data collected between 1999 and 2005, despite some of their other reports suggesting the estimate is too high.

The latest population data 15-20 years old, **it can no longer be deemed a reliable estimate of the number of brown bears in GMU 9**, especially when ADF&G indicates the population has been declining since the 2000s.

Management decisions that result in removing animals from a population **should not be based on the maximum estimate of animals in the population, but rather should be based on the minimum number of animals in the population**. That way you don't remove too many animals from the population, and don't risk jeopardizing the sustainability of the population.

The age and size of hunted bears increased in the past decade as compared to previous decades, meaning **more older “trophy-sized” bears of both sexes are being killed in recent years, and fewer younger animals are being killed**.

Recognizing the concern with “mining” out the big bears, during the 2018 Board of Game meeting, the Board members voted to reduce the spring brown bear hunt by one week. **There has not been sufficient time, or population monitoring, to know if these strategies were successful**.

*You are only* considering an additional hunting season to provide an economic stimulus to hunters and hunting guides in GMU 9 as a result of income lost due to Covid-19. Well, everyone has been affected by COVID – I fail to see how trophy hunting is an “essential” activity.

Covid-19 business aid is administered through the state and federal government, and should not be an issue taken up by the Board of Game. The Board was established to make regulatory decisions based on sound science for the sustainability of wildlife for all user groups.

The Board of Game is mandated to manage wildlife for *all Alaskans* and favoring one of the other is in violation of the board's purpose.

Specifically, Board members are appointed on “the basis of interest in public affairs, good judgment, knowledge, and ability in the field of action of the board, and with a view to providing diversity of interest and points of view in the membership”. **This proposal does not provide a “diversity of interest”, and instead focus solely on the interests of one user group, potentially at the detriment of other user groups**.

If the population is impacted, which it likely will given the biological data reported by ADF&G, the **impacts to all other users could be immense**. The wildlife viewing, wildlife photography, and sport fishing industries (who often appeal to consumers for bear viewing opportunities while fishing) account for millions of dollars each year. Not only are these users suffering during a drop in tourism this year, but could suffer from overharvest by one group later down the line if the population falls. These bears are extremely famous, both in hunting and viewing arenas, and the plight of





their populations will be monitored world wide. People come to Alaska to see wildlife and an untamed wilderness; this is worth billions to the state economy; yet, all the Board of Game does is find more ways to appease a small minority – trophy hunters – and kill the very thing non-consumptive users come to see.

Margaret McGinnis

Hull Massachusetts

Submitted By  
Sean McGuire  
Submitted On  
5/24/2020 6:05:24 PM  
Affiliation

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I'm writing to express my outrage and opposition to Proposal 1, which adds a sprog brown bear hunt in Unit 9. For 45 years that has been alternating spring and fall seasons in order to prevent overharvest Fish and Game bear biologists have repeatedly said GMU 9 brown bear populations have been declining and could not sustain an additional level of harvest. I assume that members of the board understand that brown bears reproduce slowly and have said repeatedly that brown bear populations have been declining in Unit 9. The BOG is pushing this increased bear killing. AGF & G hasn't done a brown bear transect survey since the mid 2000's and shockingly considering this proposal have no plans do any abundance survey in the foreseeable future. With this blatant disregard for Alaska's magnificent world class bears combined with the absolute scandal of allowing Denali's wolves to be virtually destroyed in the entire eastern part of the park, it's clear that the BOG doesn't care about Alaskans unless their hunters, trappers or guides. Last year only 1% of visitors saw wolves. That's down from 50% when the buffer zone was in place. I don't know if you know or even care that the majority of Alaskans are increasingly disgusted by the lack of any balance on the BOG. Even though only 15% of Alaskans have hunting licenses you don't appear to have the slightest interest in the vast majority of Alaskans that want to see our iconic wildlife protected.

Submitted By  
Douglas McIntosh  
Submitted On  
5/25/2020 11:55:52 AM  
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Proposal 1-5AAC 85.020.Seasons and bag limits for brown bear

I have made my home in Alaska since 1976.

I am a nonhunter.

My opinions are as important as those of hunters.

I am against Proposal 1.

## PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear

Hope Meyn <meynhope@gmail.com>

Tue 5/26/2020 8:03 PM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

Dear Board of Fish and Game,

I, Hope Meyn, born and raised Anchorage Alaskan, am writing you to voice my opposition to "PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear.

I am a supporter of responsible hunting, and gratefully benefit from the moose and bear meat my family hunts each year and shares. I understand that there are many reasons Alaskan's hunt - as a primary food source, a traditional practice, a supplementary food source and for sport. Hunting does not exist without balance however, and this proposal directly opposes that balance and threatens to cause further decline of the bear population.

Please do not allow this proposal to move forward.

Sincerely,

Hope Meyn, RN

Airport Heights

Anchorage AK 99508

Submitted By  
Pat Miller  
Submitted On  
4/23/2020 1:39:22 PM  
Affiliation

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To Whom It May Concern:

We would like to comment regarding agenda item 2, transfer of 2020 Spring Black Bear permits for GMU 1-3 to a future year.

Since the draw has already taken place for the 2020 fall and 2021 spring hunt, we would recommend that the 2020 spring permits be transferred to the fall of 2021 and spring of 2022. We feel that those that have a 2020 spring black bear tag should have their tags rolled to the fall of 2021 and spring of 2022 if they still want to utilize their tags. We would suggest putting a deadline on when the permit holders would need to contact Alaska Department of Fish and Game to be eligible to have their tags transferred to the fall of 2021 and spring of 2022. We hope that a decision can be made in very timely manner so that these permit holders know what action is going to be taken for them.

Thank you for your time and consideration.  
Bob & Pat Miller, owners  
Calder Mountain Lodge  
Point Baker, AK

Submitted By  
Dan Montgomery  
Submitted On  
5/27/2020 11:55:29 PM  
Affiliation

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Thank you for this opportunity to comment on these two board proposals.

I support both of these board proposals. With no non-resident seasons at all this year and very restricted access because of the state mandates and area restrictions by boroughs and villages there has been almost no harvest of bears this spring in these areas. I personally went down to the Alaska Peninsula and hunted in 9D and 9E and saw good numbers of bears everywhere. I was looking for a giant with great hair but did not see one, lots of rubbed bears. I saw no one else hunting at all. With little to no harvest this spring you will have an even larger bear population for the spring of 2021. There will be a large harvestable surplus of bears carried over to next year. There are sows that didn't get harvested this year that will breed this spring and have young next spring and will not be able to be harvested in 2021. Having both a spring and fall hunt in unit 9 in 2021 is not going to create a larger harvest in either season. It's not going to make the bears easier to hunt or expose them to more hunters. This is remote country with very harsh weather and difficult access. Adding a spring season in 2021 will only create an opportunity for hunters to harvest some of the bears that didn't get harvested in 2020. I saw good numbers of sows with cubs this spring and all had 2 to 3 cubs and two had 4 cubs. I think the population is having a strong rebound from their lower numbers 5 or 6 years ago and having a spring season in 2021 is the right thing to do and will have no negative impact on the bear population.

I support proposal number 2 also. Carrying these draw permits over to next spring is also the right thing to do and give these hunters an opportunity to hunt. I think you should also consider adding a few permits over the next year or two to make up the lost opportunity in these areas. There is an extra harvestable surplus of bears in these areas now and adding a little extra opportunity will not have any negative impact on their population. It will not create any more opportunity over a 3-year average in these areas. Thank you for your time and efforts.

Submitted By  
lee pastewka  
Submitted On  
5/26/2020 11:54:07 AM  
Affiliation

Regarding PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear

I am not an Alaskan resident but a frequent visitor to Katmai National Park/ Brooks Camp. It is extremely concerning that an additional hunt in this area is being considered solely for the purpose of financial gain in the face of the pandemic closures. History suggests that 3 consecutive hunting seasons is excessive and with that in mind it seems inconsiderate and disrespectful of the bear population to allow a spring hunt in 2021 for any reason other than necessary population control. Since this is not the case and there is no data to suggest that the population will not be adversely affected by the added hunt, I respectfully request that you cease consideration of this additional hunt.

Thank you, Lee Pastewka



Submitted By  
Cabot Pitts  
Submitted On  
5/26/2020 9:41:19 PM  
Affiliation

Dear Chairman Spraker and the Board of Game,

I would first like to thank you for your services on the Board and I appreciate you taking my comments regarding to the special meeting addressing the loss of spring bear hunting opportunity for residents and nonresidents due to the travel restrictions and closures that resulted from the Covid-19 pandemic.

I am a resident of Palmer, Alaska and like all of us, we have suffered greatly in some shape or form from the Covid-19 pandemic. I own and operate a hunting and outfitting business that specializes in fully guided brown bear and moose hunts in Unit 9 based out of King Salmon, Alaska. I also guide for other outfitters on Kodiak Island and in the Brooks Range. As if the guiding doesn't take up most of my time, I fill the rest of my season commercial salmon fishing in Bristol Bay. Needless to say, I live for the outdoors. The unfortunate closure of our spring brown bear season in Unit 9 for non-residents and travel restrictions in place made it very hard to operate or even make it down to hunt as a resident unless one owned his or her personal plane. To make up for the loss of opportunity from both resident and nonresident brown bear hunters, I am in full support of proposal number two and the opening of a special one-time spring brown bear season in 2021 for registration hunts.

Talking to my nonresident hunters that were booked to hunt this spring, all were saddened they were not allowed to travel and hunt in Alaska. Although understanding of the issue, they were worried that there would not be an opportunity available for them to hunt in the future because of the alternating years and my current full bookings.

I believe that having a special one-time opening in the spring of 2021 could easily solve the missed hunt opportunity. If this is allowed, it is important to be cognizant of the potential over abuse of the open registration, which could result in over harvest or other possible threats to the game in unit 9. My recommendation to help regulate any possible abuse by outfitters trying to "capitalize" on an "extra season" would be to work with the Big Game Commercial Services Board (BGCSB). By working with the BGCSB, you can allow in this special opening season in Unit 9:

- ONLY outfitters that were registered in any Guide Use Area within Unit 9 prior to the closure of the 2020 spring brown bear season for nonresidents mandated by the state.
- In addition to the Guide Use Area registration, would be only to allow nonresidents that had a signed hunt contract and were currently booked for a 2020 spring brown bear hunt with a registered contracting outfitter in Unit 9.
- Another potential stipulation would be to only allow nonresident hunters that had purchased a hunting license and brown bear locking tag prior to the closures be allowed to hunt. This may not be fair as in some cases many nonresident hunters purchase their hunting license and tags when they arrive in Alaska prior to going out into the field.

In conclusion, the protection of our game should come first as we navigate the loss of hunting opportunities within the state. I have faith that the board will look at the broad picture we face and will make the right decision. Thank you again for your time spent reading my comments and I look forward to the outcome of the Board's decision on June 3, 2020.

Sincerely,

Cabot Pitts

Alaskan Registered Guide #1299



Submitted By  
Raewyn Poole  
Submitted On  
5/26/2020 7:23:05 PM  
Affiliation

Proposal 1 - 5 AAC 85.020. Seasons and bag limits for brown bear

I am writing to say that I do not support the above proposal. The available evidence suggests that it will jeopardize the future sustainability and population health of brown bears on the Alaska Peninsula for short-term economic gain.

Alternating seasons (spring in even years, fall in odd years) have been in effect since 1976 because of overharvesting resulting from 2-season years, which was unsustainable for the bear population. There is no evidence that this situation has changed or that adding a spring 2021 season would not result in overharvest. In fact, just 2 years ago, the ADF&G bear biologist for GMU9 stated that the bear population could not sustain an additional level of harvest, even at a comparatively low level by residents.

Additional, current data on the size and health of the bear population need to be obtained by bear biologists, preferably across a number of years to control for fluctuations in food sources (e.g. salmon runs).

Alaska's brown bears are an iconic species and draw many visitors to Alaska for wildlife viewing. This activity creates greater economic benefit for Alaska residents than hunting, with visitors spending money at local businesses not directly linked to the wildlife viewing (eg, local hotels, restaurants, shops, other attractions, transport services, sightseeing tours, travel to other parts of the state). Protecting the bears would provide longer-term, sustainable, economic benefit, whereas overharvesting could irreparably damage this. Thank you for considering my submission.



unapologetically **FOR ALASKAN RESIDENTS**

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May 26, 2020

Comments to Alaska Board of Game  
Special Teleconference Meeting Regarding Spring Bear Hunts  
June 3, 2020

PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear

SUPPORT

Due to the Covid-19 pandemic and travel restrictions, the nonresident 2020 spring bear hunts in Alaska were canceled. Intra-state travel restrictions also prevented some residents from participating in Unit 9.

We well understand the logistics guides go through from the time they book a client until the client arrives, and the money it takes to prepare for hunts in Unit 9 on the Alaska Peninsula. The loss of those booked clients in 2020 was devastating, and we hope that most of those clients will let their deposit hold over and come back in 2021.

As long as the Department has no conservation concerns holding a one-time special spring brown bear season in Unit 9 in an odd-numbered year, along with the fall hunt that same year, we support having a special one-time-only spring season in 2021 for both residents and nonresidents.

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PROPOSAL 2 - 5 AAC 92.050. Required permit hunt conditions and procedures

OPPOSE but support the intention

As we stated in our comments in the past teleconference meeting, the transfer and reissuing of black and brown bear draw permits to a "future year" to those who won a permit but were not able to hunt due to the coronavirus and travel mandates is problematic on many levels.

We initially supported the intention of this proposal. Through no fault of their own, nonresident bear hunters who drew a tag to hunt in the spring of 2020 were unable to participate due to the Governor closing all nonresident spring bear hunts due to the Covid-19 pandemic. Many resident hunters as well were unable to participate due to the intrastate travel restrictions. It would be a good thing if we could

somehow reissue permits to those who were unable to hunt due to the travel restrictions.

Some of us have had circumstances happen where we draw a permit but then were not able to hunt it. So in some respects, it may be best to just chalk it up to a missed opportunity through no fault of the Department or State or anyone else, and ask hunters to try again for a draw permit.

The Department estimates that they will need to spend \$30,000 to make this reissuing of permits work. But how would the reissuing of permits work? The 2021 draw application has already taken place and the winners have already been determined. Because of conservation concerns we can't allow the 2021 winners and the 2020 winners who were unable to participate to all hunt the spring of 2021. So the Department recommends any reissuing of permits be for the 2022 spring season, with no new application period for the 2022 spring drawings. That doesn't seem to help guides who have already taken deposits and are hoping their clients will let them keep the deposit for next spring's hunt.

What about the permit winners for this spring not being able to go in the spring of 2022 for whatever reason? Are we going to extend these permits to past 2022? And what about license and tag refunds for those who don't want, or can't, hunt in a future year?

On Kodiak, as we have pointed out, nonresidents don't actually have to go through the permit process, so any nonresident clients who either drew a tag or got an OTC tag in Kodiak absent the draw permit application process, could theoretically come back in spring 2021 with that same guide. On the other hand, all residents must go through the draw permit process with very little odds of winning, and have no recourse but to apply again if the permit is not reissued.

As the Department says in their comments on this proposal: *"There are many aspects to this process that are not clearly defined and it is difficult to ensure that permit holders will be treated equitably while implementing the board's intentions in an efficient manner. In addition, with adoption of this proposal the board will set a precedent and it is likely that future permit holders will request similar actions when unforeseen circumstances preclude them from hunting."*

We feel for the hunters who had put in for tags for a long time and finally drew a permit, and then were not able to hunt through no fault of their own. We feel for the guides as well who lost business. However, the comments from the Department lead us to the conclusion that perhaps this idea of reissuing of permits, however well-intentioned, is too problematic, costly, has too many negatives involved, and should be voted down.

Thank you for the opportunity to comment,

Mark Richards  
Executive Director Resident Hunters of Alaska (RHAK)  
(907) 371-7436

Submitted By  
Richard Rohrer  
Submitted On  
5/27/2020 1:12:16 PM  
Affiliation

Phone  
907-539-5800

Email  
[rohrer@ak.net](mailto:rohrer@ak.net)

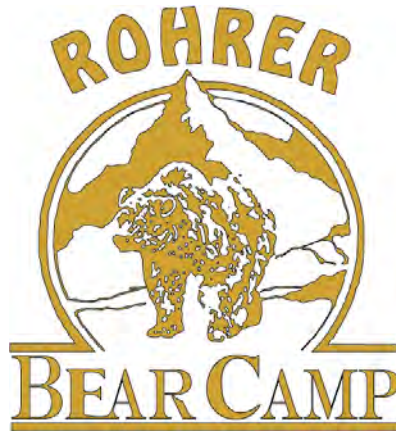
Address  
box 2219  
Kodiak, Alaska 99615

Att. Chairman Spraker and BOG members, Please consider the following in regards to Proposal # 2 specific to the Transfer of Brown Bear Permits for Unit 8. My comments will only address the Guided non-resident hunter opportunity. I understand the Boards desire to act on a fairly simple regulation change to allow the transfer of Permits due to lost opportunity to hunt during the recent Brown Bear season that was closed to all non-residents that had successfully drawn a permit. I am concerned with the lack of specific direction to the department with the statement "at the discretion of the Commissioner". I don't believe that the Department fully understands the pressing need to make a decision immediately so that the Guiding Industry and their Non-Resident Clients can move forward with plans for future hunting opportunity. I encourage the Board to give clear and specific direction as to their intent with this proposed Transfer Regulation as it affects the Unit 8 Permits. I'm in support of a plan to transfer all non-resident permittees selected for the Spring 2020 season on Kodiak to the spring 2021 season provided all the other provisions for the Kodiak Drawing system remain in place. Due to a harvest of only 20 bears by resident hunters this 2020 spring season I do believe there could be some regained lost opportunity by adding back in some permits. There is justification for and against this suggestion however I don't believe the Department estimate of a \$30,000 cost should prohibit a full discussion on this subject. If the Board declines to pass proposal #2, I encourage you to waive the every other year requirement for permits so our clients can apply for and if drawn be awarded the same permit for spring 2021 as they held for the spring 2020 season. Thank you for the opportunity to comment and thanks for your service to our State, Dick Rohrer, Master Guide #69, 50 plus year resident of Kodiak.



## MASTER GUIDE

Sam Rohrer  
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Kodiak, Alaska 99615  
Ph: 1-907-486-4074  
Cell: 1-907-539-1828  
sam@kodiakbearcamp.com



## FAIR CHASE HUNTING

Brown Bear  
Mountain Goat  
Sitka Blacktail Deer  
Wildlife Viewing  
Sport Fishing

May 27, 2020

Dear Chairman Spraker and BOG Members,

Thank you for serving our state and its wildlife resources. I am very appreciative that you heard the hunting public's concerns and generated proposals 1 & 2.

I support Proposal 1 as written, and I support Proposal 2 as modified by the Alaska Professional Hunters Association's (APHA) written comments.

APHA's Proposal 2 amendment is as follows:

- 2021 Winter Drawing for Unit 8 Resident and Non-resident Spring Bear permits proceeds as normal.
- 2020 Unit 8 Resident and Non-resident Spring Brown Bear permit winners, who were not issued their bear permit in Spring of 2020, are given 3 spring seasons to use their permit. (2021, 2022, 2023)
- No more than 3 of the 2020 permit holders will be allowed to hunt per spring season, in each drawing hunt area.
- The 3 slots will be awarded on a first come, first served basis. The slots will be reserved by contacting the Kodiak ADF&G Office, no later than October 1<sup>st</sup> of the preceding year.

### **Benefits to Hunters:**

All hunters, both resident and non-resident, benefit from this proposal, as they will have an opportunity to utilize their awarded bear permits.

### **Benefits to ADF&G:**

The Alaska Department of Fish and Game benefits by uninterrupted license and application fee sales. If hunters are given an opportunity to utilize their permits over the next 3 years, then the department will not be under pressure to return license and tag fees to hunters who were not allowed to participate in the 2020 Spring Bear season.

### **Conservation:**

Any overharvest concerns managers have can be addressed by adjusting drawing opportunities downward after 2020 permit winners have declared their intention to hunt the following spring. Each fall, the Area

Biologist provides the Department with the drawing permit numbers for each brown bear drawing hunt on Kodiak. While these permit numbers are rarely changed, they are reviewed annually, and can be lowered if conservation concerns arise.

**Crowding:**

Crowding is not a concern, because no more than 3 additional hunters per hunt area will be allowed per year. It is unlikely that these 3 additional hunters will hunt during the same time period.

**Precedents:**

I am concerned that if the BOG and ADF&G does not work to provide an opportunity for awarded permits to be utilized, that they will be setting a precedent where the State is willing to forego hunting opportunity that was lost for reasons outside of conservation concerns. We are truly at a crossroads. Option 1 is to pass Prop. 2 as written and not set clear direction and goals to recover lost opportunity. Option 2, APHA's proposed amendment, works to regain sustainable hunt opportunity and will work towards receiving the maximum benefit of the resource for Alaskans. If the State sets a precedent by not working to recover opportunity that has been lost by our response to a public health crisis, I question what other situations could be used to justify lost hunting opportunity. I have heard concerns about the precedent that will be set by working to regain opportunity on Kodiak and I understand those concerns because they require changes to a working permit application and award system. However, it is my belief that the strength of Alaska's Board of Game process is its flexibility and responsiveness to the public. I am hopeful that the Board of Game and the Department will work together to set a precedent that demonstrates the flexibility and strength of our public process. Amending Prop 2. and clearly setting goals to achieve harvest objectives upended by the spring 2020 closure will demonstrate to the public that the Board of Game process can respond to a crisis and that the easy solution to close seasons and give up harvest is not the path forward.

Thank you for taking the time to thoughtfully read my comments. I appreciate all that you do for Alaska.

Respectfully,

Sam Rohrer  
Kodiak, AK

Submitted By  
Becky Sanchez  
Submitted On  
5/27/2020 6:58:54 AM  
Affiliation

RE: PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear.

I oppose this proposal for hunting brown bear

If the population is impacted, which it likely will given the biological data reported by ADF&G, the **impacts to all other users could be immense**. The wildlife viewing, wildlife photography, and sport fishing industries (who often appeal to consumers for bear viewing opportunities while fishing) account for millions of dollars each year. Not only are these users suffering during a drop in tourism this year, but could suffer from overharvest by one group later down the line if the population falls. These bears are extremely famous, both in hunting and viewing arenas, and the plight of their populations will be monitored world wide.

Sincerely,

Becky Sanchez





## Proposal 1

Linda Shaw <linda.rose.shaw@gmail.com>

Mon 5/25/2020 2:42 PM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>

To whom it may concern:

I am writing to express my opposition to Proposal 1. As an Alaskan I am tired to seeing hunting guides have the only say in how our collective resources are managed in this State, to the detriment of those resources and other Alaskans. There are so many of us who spend money to SEE these bears and you are taking that right and economic vitality for the State away. Holding a spring hunt is not biologically defensible and simply bad management and absolutely nothing should override that concern. As a member of the Alaska Wildlife Alliance I have carefully read their position given below. I suggest you do the same and represent both the interest of all Alaskans and the future of the resource in your decision.

Sincerely,

Linda Shaw  
9684 Moraine Way,  
Juneau, AK 99801

### AWA POSITION

## **WE OPPOSE PROPOSAL 1, WHICH ADDS A SPRING 2021 BROWN BEAR HUNT IN UNIT 9, BECAUSE:**

### **ALTERNATING SEASONS WERE IMPLEMENTED IN FOR A REASON - PREVENTING OVERHARVEST.**

Hunting of brown bears in GMU 9 occurs in the spring and fall, but in alternating years (spring hunting season in even years; fall hunting season in odd years). **This alternating cycle of hunting seasons has been in effect in GMU 9 since 1976 because having two hunting seasons each year was resulting in overharvest and wasn't sustainable for the bear population.**

There have been no instances in almost 45 years in which multiple hunting seasons per year were authorized because the bear population has not been robust enough to



support multiple seasons per year. **There are no data to show that the situation has changed** and that adding a spring 2021 season would not result in overharvest.

Just two years ago at the Board of Game meeting, during a discussion by the Board of whether or not to add a resident-only early season hunt in GMU 9, **Alaska Department of Fish & Game's (ADF&G) bear biologist for GMU 9 said the brown bear population could not sustain an additional level of harvest, even the comparatively low level of harvest by residents** (which is only about 25% of the total annual harvest of brown bears in GMU 9).

It's important to note that **this is not a subsistence issue**. Some subunits in Unit 9 allow for year-round resident near-village and subsistence hunts, the only hunts that allow a bear to be taken any time of the year. The status of these subsistence hunts are not impacted by this proposal.

### **THE TRUE STATUS OF BROWN BEARS IS UNKNOWN AND DECISIONS ARE BASED ON INADEQUATE DATA.**

Surprisingly, ADF&G does not routinely monitor the population of brown bears in GMU 9. They haven't conducted transect surveys to count bears in GMU 9 since the mid 2000s and have **no plans to conduct any abundance surveys in the foreseeable future**.

This means that the **management decisions about how many bears can be harvested are not based on scientific studies** of the wild population, but rather are based on the numbers of hunters who report killing a bear.

Since ADF&G has no plans to survey the population, **they won't be able to know until it's too late if too many bears were killed** as a result of three consecutive hunting seasons in a row for the population to maintain long-term viability.

ADF&G's bear biologist for GMU 9 has recently expressed concerns to the Board of Game that the **population of brown bears in GMU 9 has been declining since the 2000s**, and from 2013-2017, he received numerous reports from area scientists, long-term guides, and the public asking **"Where's the bears?"** because they weren't seeing them like they used to.

In 2018 ADF&G reported that **an entire cohort (age class) of young bears was lost** due to a longer spring hunt in 2013 and severe weather events in winter 2011/2012 and 2012/2013. This loss is in addition to the long-term decline in bear numbers.

The total number of bears harvested in the last decade was notably less than previous decades, which is a sign of concern for the population.

During the 2018 Board of Game meeting this was theorized to be **the result of the inability of hunters to find bears because there were fewer bears to find** (and not a reduction in the desire to hunt brown bears).

ADF&G continues to claim there are "up to 8,000 bears" in GMU 9 based on extrapolations from data collected between 1999 and 2005, despite some of their



other reports suggesting the estimate is too high.

The latest population data 15-20 years old, **it can no longer be deemed a reliable estimate of the number of brown bears in GMU 9**, especially when ADF&G indicates the population has been declining since the 2000s.

Management decisions that result in removing animals from a population **should not be based on the maximum estimate of animals in the population, but rather should be based on the minimum number of animals in the population.** That way you don't remove too many animals from the population, and don't risk jeopardizing the sustainability of the population.

The age and size of hunted bears increased in the past decade as compared to previous decades, meaning **more older "trophy-sized" bears of both sexes are being killed in recent years, and fewer younger animals are being killed.**

Recognizing the concern with "mining" out the big bears, during the 2018 Board of Game meeting, the Board members voted to reduce the spring brown bear hunt by one week. **There has not been sufficient time, or population monitoring, to know if these strategies were successful.**

ADF&G's management guidelines for GMU 9 bears is to "maintain a high bear density", but it is unclear how they measure a bear density, let alone ensure high bear density, when they are not conducting population surveys. AWA asked ADF&G this question, but has not yet received a reply.

## **THE BOARD OF GAME IS PLAYING POLITICS OVER BIOLOGY**

The Board is *only* considering an additional hunting season to provide an economic stimulus to hunters and hunting guides in GMU 9 as a result of income lost due to Covid-19.

Covid-19 business aid is administered through the state and federal government, and should not be an issue taken up by the Board of Game. The Board was established to make regulatory decisions based on sound science for the sustainability of wildlife for all user groups.

The Board of Game is mandated to manage wildlife for *all Alaskans* and favoring one of the other is in violation of the board's purpose.

Specifically, Board members are appointed on "the basis of interest in public affairs, good judgment, knowledge, and ability in the field of action of the board, and with a view to providing diversity of interest and points of view in the membership". **This proposal does not provide a "diversity of interest", and instead focus solely on the interests of one user group, potentially at the detriment of other user groups.**

If the population is impacted, which it likely will given the biological data reported by ADF&G, the **impacts to all other users could be immense.** The wildlife viewing, wildlife photography, and sport fishing industries (who often appeal to



consumers for bear viewing opportunities while fishing) account for millions of dollars each year. Not only are these users suffering during a drop in tourism this year, but could suffer from overharvest by one group later down the line if the population falls. These bears are extremely famous, both in hunting and viewing arenas, and the plight of their populations will be monitored world wide.

## TOO MUCH, TOO SOON

If the Board considers the smaller 2020 season a “wash” that allows increased harvest in 2021, they should have closed the spring 2020 season. Instead, **as of May 8, ADF&G had issued 36 permits to resident hunters for the spring 2020 season hunt**, which is open through May 31 in some places.

This proposal is only appropriate to consider after the end of the Spring 2020 season so we know how many bears were taken and can make a better determination. **The Board’s rush to consider this proposal suggests that they are doing it to ensure guides have economic prospects** and can roll over hunts. If the Board is rushing this because they want to do this through the existing chair (he retires in June), that is **not a sufficient reason to haste biologically teetering information**.

## IN SUMMARY

The Board of Game wants to add an extra hunting season in the spring of 2021, when there normally would not be a hunt, resulting in 3 back-to-back hunts, which hasn’t occurred since the 1970s because multiple seasons per year result in known overharvest. They want to do this for a population with an outdated abundance estimate, that is experiencing a long-term decline in numbers, which has lost an entire cohort, and for which a disproportionately large adults are taken in recent years. Because there is no monitoring of the brown bear population, there is no way to know what kind of effect adding an extra hunting season next spring will have on the population. Some have dismissed any effects of an additional hunt next spring because they say there was no hunt this spring, however, the season was not closed and at least 36 permits were issued. Since the season hasn’t officially closed yet, and permits were issued, it is premature to assume no bears were killed this spring.

Submitted By  
Philip Shoemaker  
Submitted On  
5/26/2020 10:28:13 PM  
Affiliation  
APHA member

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Email  
[grizskins@gmail.com](mailto:grizskins@gmail.com)  
Address  
PO Box 273  
King Salmon, Alaska 99613

Proposal 5 AAC 85.020

Support- Opening a spring 2021, non-resident brown bear hunting season in Unit 9

My Name is Philip Shoemaker. I have been a resident of the King Salmon area for 33 years. I fully support the boards proposal to make a special acceptance and open a Spring 2021 season in Unit 9 for non-resident hunters. The complete loss of guiding season for Spring of 2020 could have a long-term crippling impact on many small guide/outfitter businesses. The closure of Unit 9 bear hunting to non-residents in 2020 has caused unemployment and financial distress among guides. Without a Spring 2021 hunt to make up for this loss of season, this could mean losing an entire year of hunters as many businesses are booked the following year and cannot move their bear hunts forward to the next season.

Without a Spring 2021 bear hunt in Unit 9, it will be financially ruinous for many. That said, the impact on the resource should be everyone's number one concern. There would be no additional take if it were open only to non-residents, as they were already booked for the 2020 season. If the board moves to open a one-time-only Spring 2021 bear hunt in Unit 9 to both non-residents and residents, they would need to stipulate that, any resident hunter who hunted bears in Unit 9 in 2020 would be ineligible for a spring 2021 season as this could impact the population and lead to overharvest.

Thank you for considering what is best for small Alaskan Businesses and Alaskans. I urge the board to open a Spring 2021 bear hunt as a *one-time-only* season so guides/outfitters can make up for the loss of revenue for 2020.

Philip Shoemaker  
Grizzly Skins of Alaska  
907-928-1097  
[Grizskins@gmail.com](mailto:Grizskins@gmail.com)

Submitted By  
Tia Shoemaker  
Submitted On  
5/26/2020 2:44:05 PM  
Affiliation

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[tia.shoemaker@gmail.com](mailto:tia.shoemaker@gmail.com)  
Address  
PO box 273  
King Salmon, Alaska 99687

Proposal 5 AAC 85.020

Support- Opening a spring 2021, non-resident brown bear hunting season in Unit 9

My Name is Tia Shoemaker. I have been a resident of the King Salmon area for 33 years. I fully support the boards proposal to make a special acceptance and open a Spring 2021 season in Unit 9 for non-resident hunters. The complete loss of guiding season for Spring of 2020 could have a long-term crippling impact on many small guide/outfitter businesses. The closure of Unit 9 bear hunting to non-residents in 2020 has caused unemployment and financial distress among guides. Without a Spring 2021 hunt to make up for this loss of season, this could mean losing an entire year of hunters as many businesses are booked the following year and cannot move their bear hunts forward to the next season.

Without a Spring 2021 bear hunt in Unit 9, it will be financially ruinous for many. That said, the impact on the resource should be everyone's number one concern. There would be no additional take if it were open only to non-residents, as they were already booked for the 2020 season. If the board moves to open a one-time-only Spring 2021 bear hunt in Unit 9 to both non-residents and residents, they would need to stipulate that, any resident hunter who hunted bears in Unit 9 in 2020 would be ineligible for a spring 2021 season as this could impact the population and lead to overharvest.

Thank you for considering what is best for small Alaskan Businesses and Alaskans. I urge the board to open a Spring 2021 bear hunt as a *one-time-only* season so guides/outfitters can make up for the loss of revenue for 2020.

Tia Shoemaker  
Grizzly Skins of Alaska  
907-599-0842  
[Tia.shoemaker@gmail.com](mailto:Tia.shoemaker@gmail.com)



Submitted By  
Laura Sneddon  
Submitted On  
5/24/2020 12:46:50 AM  
Affiliation

Dear Board of Game,

I'm writing to share my concerns over PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear. I oppose this proposal as it is dangerous for a few main reasons:

1. No recent studies have been done to estimate the current bear population in GMU 9. The latest population data from 1999-2005 is 15-20 years old and can no longer be deemed a reliable estimate of the number of brown bears in GMU 9, especially when ADF&G indicates the population has been declining since the 2000s.
2. ADF&G's bear biologist for GMU 9 has recently expressed concerns to the Board of Game that the population of brown bears in GMU 9 has been declining since the 2000s. In 2018, ADF&G reported that an entire cohort of young bears was lost due to a longer spring hunt in 2013 and severe weather events in winter 2011/2012 and 2012/2013- this loss further supplements the long-term decline in bear numbers. Additionally, the total number of bears harvested in the last decade was notably less than previous decades, which is another sign of concern for the population.
3. The Board is considering an additional hunting season to provide an economic stimulus to hunters and hunting guides in GMU 9 as a result of income lost due to COVID-19. Aid to businesses impacted by COVID-19 is under the jurisdiction of the federal and state government. The Board is meant to make regulatory decisions based on sound science for the sustainability of wildlife for all user groups and should not be meddling in politics.

Thank you for considering these points for reasons why "PROPOSAL 1 - 5 AAC 85.020. Seasons and bag limits for brown bear" should **not** be approved.

Sincerely, Laura

Submitted By  
Jason Lee Stafford  
Submitted On  
4/24/2020 9:56:24 AM  
Affiliation

Board of Alaska Game Members:

First off thank you for taking the time to consider the two proposals before you regarding the 2020 spring bear seasons.

My comments are geared specifically toward **proposal #2** the transfer of this year's draw permits to a future year in Units 1-3. After several unsuccessful applications I was delighted to have finally drawn a Unit 2 spring black bear permit for Prince of Wales Island. Unfortunately, due to COVID-19 the season was cancelled for non-resident hunters in fear of spreading the virus, rightfully so. I do not want to lose my opportunity to go on this coveted hunt and I ask you to approve **proposal #2** and transfer my draw permit to 2021.

On an additional note I listened to your first meeting regarding these two proposals and there were comments made regarding if an individual were to seek a refund, they should forfeit their permit. In March prior to the COVID-19 outbreak I purchased a non-resident hunting license (\$160) and a black bear locking tag (\$450) in anticipation of hunting in May. These purchases are specific to the hunt year 2020. If you approve transferring my permit to a future year are you considering transferring my hunting license and locking tag to that year as well. If not, I feel you should refund these fees without affecting the draw permit. You will "technically" not lose any monies because I will repurchase an updated hunting license and black bear locking tag for the calendar year that I would be permitted to hunt.

Thanks for all that you do for the wildlife of Alaska,

Jason Stafford





Submitted By  
Henry D Tiffany IV  
Submitted On  
5/26/2020 10:22:27 AM  
Affiliation

Dear Chairman Spraker and Board of Game Members,

As a life-long Alaskan, avid hunter, outdoorsman and professional guide, I am in full support of Proposal #1 and #2, which address the lost opportunity of Spring 2020 bear hunting in Alaska by non-resident hunters. I believe both proposals adequately address the intent to allow for, and make up, in 2021 the lost opportunity by non-resident bear hunters in 2020 due to the COVID-19 Pandemic and the closure of the Spring 2020 Non-Resident Bear Seasons statewide.

I believe that Proposal #1 and the creation of a special Spring 2021 Bear Season in GMU 9, when coupled with the State of Alaska, Big Game Commercial Services Board proposed regulation to restrict guide's from registering to utilize a special Spring 2021 season in GMU 9 unless they can demonstrate that they had intended to guide hunters in GMU 9 in 2020, will not result in, ultimately, any greater harvest by non-resident hunters than would have occurred if there had been the regular 2020 bear season and then the regular October 2021 season; it remains two separate seasons simply condensed into one calendar year to, appropriately, make up for the lost opportunity in 2020. Resident hunters did not suffer this same loss of opportunity, only non-residents did, as resident hunters were allowed to hunt in GMU 9 in the spring of 2020.

It is my sincere hope that the Board of Game passes both of these proposals. I appreciate the board's willingness to consider the challenges that have been faced by all in this unprecedented time we have all found ourselves in and passage of these two proposals is well intended, very important and the correct path I believe to allow for lost opportunity.

Respectfully,

Henry D. Tiffany IV

Ester, Alaska



## public comment on bear killing proposals for june 3 meeting

jean public <jeanpublic1@gmail.com>

Sun 4/19/2020 1:49 PM

To: DFG, BOG Comments (DFG sponsored) <dfg.bog.comments@alaska.gov>; scoops@huffpost.com <scoops@huffpost.com>

i am against proposal one to open special spring bear murder season if the season went by let it go by. there is no need for this human assault against bears ever. it is murderous and disgusting, inhumane and vicious.

a to proposal 2 - i am against open special season to murder bears.

your proposals are vicious and nothing but horrible and encouraging the most vicious attacks by humans and the worst kind of murderous humans.

shut down these attacks on animals. they deserve to live and want to live as much as you do.

this comment is for the public record

jean upbliee

[jeanpublic1@gmail.com](mailto:jeanpublic1@gmail.com)

flemington

Submitted By  
Zach Werle  
Submitted On  
5/19/2020 7:18:11 PM  
Affiliation

I am contacting you in support of the Board of Game Proposal #2 to "Allow the transfer of 2020 spring season drawing permits to a future year for hunting black bear in Units 1-3, and 14C JBER, and brown and grizzly bear in Units 4, 8, 10, 14C, 22 and 26B".

The majority of 2020 spring bear hunt permit holders had to cancel their hunts due to the travel restrictions imposed by Governor Dunleavy's mandates in response to the COVID-19 pandemic. I wholeheartedly agree that this decision was best for the health and well-being of all Alaskans. However, this has resulted in great disappointment for many hunters who were lucky enough to draw those tags. Many of these permits are considered to be a "once in a lifetime" hunting opportunity.

I am thankful for the opportunity to voice my opinion to the Board of Game, and to know that I have the ability to weigh in on a topic that is important to me as an Alaska resident and a hunter. I greatly appreciate the Board of Game's willingness to consider a transfer of these 2020 permits to a future year and I urge you to move forward with this proposal.

Sincerely,

Zach Werle  
Fairbanks, AK