



# **BACKCOUNTRY HUNTERS AND ANGLERS ALASKA CHAPTER**



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## **Comments to the Alaska Board of Game Spring 2011 Region IV Meeting**

Proposals we SUPPORT: 59, 70, 87

Proposals we OPPOSE: Bear Conservation Policy, 25, 41, 77, 103, 106, 122, 223

### **Findings of the Alaska Board of Game Bear Conservation , Harvest, and Management Policy**

#### **OPPOSE**

For many years the Board has wisely been very careful to distinguish between what is fair chase “hunting” and what is known as “control.” And the Board has always ensured that any bear “control” efforts were conducted under the provisions of a formal bear control implementation plan for specific areas.

But with this new policy the Board is saying that black bear trapping and the incidental catch of brown/grizzly bears, the taking of sows with cubs and cubs, the use of helicopters to transport bear hunters and their gear, and the spotting of bears from the air and landing and shooting the same day, can be done as part of a general hunting provision.

As a hunting and fishing conservation organization that strives to promote fair chase hunting practices and principles, the Alaska chapter of Backcountry Hunters & Anglers is deeply saddened by the new provisions within this new bear Policy that will legalize under general hunting provisions things that are contrary to any notion of fair chase hunting practices and ethics.

We see absolutely no reason or rationale to allow any of these provisions in the new bear Policy to be conducted outside the process of a formal bear control implementation plan drafted by the Department. The Board has passed numerous bear control programs using that process. There is no reason to believe they cannot do the same in future, and keep these highly controversial methods and means separate at least from what is considered to be “hunting.”

We urge the Board to reconsider passage of this new bear Policy.

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**Proposal 25** – 5AAC 85.020 Hunting seasons and bag limits for brown bear, and 92.132 Bag limit for brown bears.

### **OPPOSE**

Currently in Unit 19A and 19D nonresidents can harvest two brown/grizzly bears per year. The rationale for that nonresident bag limit was to ostensibly increase harvests in certain areas where bear predation on moose calves was at high levels, in order to boost moose populations.

Very few guided hunters so far have taken advantage of this new two-bear limit in parts of Unit 19.

If the Board wants to see more brown/grizzly bears harvested in certain areas in order to effectively increase moose and/or caribou populations, which seems to be the main intent of this proposal, allowing guided nonresident hunters to harvest two bears per year in certain units has absolutely no efficacy.

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**Proposal 41** – 5AAC 85.020 Hunting seasons and bag limits for brown bear; and 92.044 Permit for hunting black bear with the use of bait or scent lures.

### **OPPOSE**

In the past, other than under a formal brown/grizzly bear control implementation plan, the Board and the Department have always opposed the taking of brown/grizzly bears over bait.

In spring of 2009 there were proposals to allow the taking of brown/grizzly bears over bait in several units, including Unit 13. Proposal 75 was one such proposal for Unit 13 and the Department recommended **do not adopt** using, in part, this rationale:

*“Brown bear harvest has increased in GMU 13 since hunting regulations were liberalized. The yearly harvest has gone from an average of 84 a year in the early 1990s to 138 a year since 2003.... While baiting is the only option for taking black bears in heavily timbered habitats, there are other ways to harvest brown bears over most of Unit 13.”*

Proposal 166 (also from spring 2009) asked to allow brown/grizzly bear baiting as part of the Unit 16 bear control program and even there the Department recommended **do not adopt**, using this rationale:

*“Although there has been a two brown bear bag limit in effect in Unit 16B since 2005, there is not a brown bear control program in Unit 16 and as such the department is opposed to taking of brown bears over bait.”*

Those proposals did not pass and we don't believe anything has changed since 2009 that would sway the Board to suddenly support the taking of brown/grizzly bears over bait to increase hunting opportunities.

As far as any dangers or hazards, brown/grizzly bears visit black bear bait stations across much of the state, and Unit 13D (and that habitat) is in no way unique in this regard. To conclude that this makes black bear bait stations somehow unsafe or dangerous is disingenuous, when the only thing that makes black bear bait stations hazardous or unsafe or dangerous to hunters or their children, because brown/grizzly bears may be lured into those baits/lures, is the bait station itself.

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**Proposal 59** – 5AAC 85.045(11) Hunting seasons and bag limits for moose.

**SUPPORT (but amend season dates)**

AK BHA continually advocates for youth hunting opportunities prior to the school season. One of the benefits the Department described in this proposal is that this *“early season will also be beneficial to families wishing to take children hunting prior to the start of the school year.”*

The suggested season dates in this proposal are Aug. 19 – 25. **However, classes in the Anchorage and Fairbanks school districts begin on Aug. 18.**

We agree with a 7-day season length but would **recommend the season runs Aug. 15 – 21**, so indeed the youth we so desperately need to carry on our hunting traditions have a few days to take advantage of this hunt before school starts.

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**Proposal 70** – 5AAC 92.540 Controlled use areas.

**SUPPORT**

The growing prevalence of river boaters hauling ATVs to use off river is creating problems and conflicts in some areas. We are seeing more and more advisory committees coming to the Board with these types of issues.

We support this common sense proposal from the Paxson Advisory Committee.

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**Proposal 77** – 5AAC 92.125 Predation Control Area Implementation Plans.

**OPPOSE**

AK BHA is on the record strongly opposing all foot snaring of brown/grizzly bears, and we are dismayed that the Department, after clearly stating in the past that black bears were the primary source of moose calf mortality in Unit 16, and after reports show increases in moose densities and moose calf survival in Unit 16 after years of both wolf and black bear control and very liberalized black and brown/grizzly bear seasons and harvests, now suddenly supports the snaring of brown/grizzly bears in any part of Unit 16, as stated in the Department recommendations for this proposal.

We are highly skeptical with any results from an ostensible one-year research study in a very small area of Unit 16B in the Shirleyville area that claim the exact opposite of what ADFG has presented in the past to rationalize the black bear foot snaring control program currently in place.

We continue to **strongly** oppose any snaring of brown/grizzly bears in any area of the state, even as part of a bear control implementation plan in a limited area.

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**Proposal 87** – 5AAC 85.045(12) Hunting seasons and bag limits for moose

**SUPPORT**

We support this proposal but ask that there is more specificity in the caliber of shotgun and type of ammunition (slug only) used.

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**Proposal 103** – 5AAC 92.125 Predation control areas implementation plans

**OPPOSE**

We cannot support the continuation of this predation control plan if it includes the foot snaring of black bears and helicopter transport of “hunters” to bait stations or bait station “camps.”

**We strongly oppose any inclusion to include the foot snaring of brown/grizzly bears, even in a limited area, especially in light of the fact that the moose population and calf recruitment is increasing.**

Please also refer to our comments on Proposal 77.

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**Proposal 106** – 5AAC 84.270 Furbearer trapping.

**OPPOSE**

AK BHA continues to strongly oppose any trapping of black bears by the public in sympatric ecosystems where brown/grizzly bears are also present.

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**Proposal 122** – 5AAC 92.052 Discretionary permit hunt conditions and procedures.

**OPPOSE**

We cannot fathom why the Board would seek to repeal Department discretionary permit hunt authority, as this Board proposal clearly states that the “use of these permit conditions allows the department to manage hunts to provide maximum opportunity, and still provide protection of the resource.

The way this proposal is worded implies that the Board believes that maximum opportunity and protection of the resource is a bad thing. **If a hunter does not wish to comply with any permit hunt conditions, then that hunter should not apply for those permit hunts.**

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**Proposal 223** – 5AAC 92.052 Discretionary permit hunt conditions and procedures.

**OPPOSE (and defer to proper in-cycle meeting)**

This proposal affects all statewide subsistence permit hunts with trophy destruction provisions, for Unit 22, 23, 12, 21, and 24, none of which are in Region IV. We cannot understand why this proposal is to be heard at a Region IV meeting, out of cycle, when those it may affect the most can't likely attend and be heard.

We oppose this proposal on the grounds that these subsistence permit hunts that require trophy destruction are working to limit applicants yet still provide maximum opportunity and sustainability for subsistence hunters who want a quality hunt and want to put healthy game meat on the table. We also recommend that this proposal be deferred to the proper in-cycle statewide or regional meeting.

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Thank you for the opportunity to comment on these proposals and for all the work and service every Board member provides to Alaskans concerned about our wildlife resources.

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