

February 10, 2015

Re: Attached letter concerning Black bear management in GMU 6D, Prince William Sound

Dear Board of Game Members:

Please find attached our group letter that expresses concern over black bear population declines in Prince William Sound. This trend has resulted in marked reductions in hunting and viewing opportunities in this unique, world-class destination for Alaskans and visitors. We support some of the specific management proposals you will be considering, and make additional suggestions. I would like to bring to your attention one additional important regulatory issue regarding issuance of an emergency order that we did not realize would be discussed during the upcoming BOG meeting in February. I would also like to make a comment about the parties that have co-signed this letter.

It appears that the Board may consider administering an emergency order to restrict the 2015 spring black bear harvest by closing the final two weeks of the season; this is in keeping with the concerns expressed by all co-signers, who unanimously urge you to take prompt action in attempt to restore black bear population numbers to a much higher level for the long term benefits of all user groups. Restricting this emergency order to western Prince William Sound (e.g., west of Pt. Freemantle) would be an unfortunate half-way measure, since it would not only be ineffective in addressing the recent decline in black bear abundance in the eastern Sound, but would also quite possibly exacerbate hunting pressure in heavily impacted areas such as Jack and Sawmill Bays, close to Valdez. Please note that many co-signers live in and/or operate out of Valdez, and have witnessed first-hand the remarkable reduction in bear abundance in our area; naturally, we would like to see remedial measures include our region. If you choose to address an emergency closure, please consider including the entirety of PWS or, at a minimum, all watersheds feeding Port Valdez and Valdez Arm.

Regarding the co-signers of the attached letter, I would simply draw your attention to the diversity of interests, depth of experience in the region, and high volume of visitors their businesses attract to Prince William Sound. This equates to millions of dollars added to the state and local economy. As you deliberate the black bear management situation in PWS, we respectfully request that you consider the lack of quantitative population data available for black bears in this region and err on the side of a conservative approach until better data becomes available.

Sincerely,

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To: Alaska Board of Game Members
Central/Southwest Meeting, February 13, 2015

Re: Proposals 209, 210, and 211 regarding harvest of black bears in GMU 6D, Prince William Sound

We, the undersigned, support Proposal 210, to change the black bear hunt to a registration hunt; we also suggest an amendment to Proposal 210 (see below) to enhance the restorative effect of this proposed change; if the Board chooses not to suspend the fall hunt, then we also support Proposal 211 to shorten the fall hunt season by postponing opening day from 10 September to 25 September; we do not support Proposal 209 to restrict harvest to one bear every three regulatory years.

Suggested amendment to Proposal 210: Change the black bear hunt to a registration hunt AND temporarily close the fall black bear season until the population can be shown to have recovered to stable, sustainable levels where the harvest does not exceed the surplus population.

General Comments:

We, the undersigned, represent a wide range of commercial and private interests with a diversity of perspectives on wildlife management in Prince William Sound. From sport- and subsistence black bear hunters to charter services and tourism businesses whose livelihood depends upon wildlife watching, we have all observed a marked decline in black bear sightings throughout Prince William Sound over the past decade, with a particularly worrisome drop in sightings over the past three years. Many of us measure our familiarity with Prince William Sound in decades, during which time spent hunting, studying, and appreciating its remarkable wildlife has been a central focus.

Our common interest is to see black bears managed so as to maintain a sustainable, abundant population that supports quality hunting and quality viewing opportunities. We believe that the current liberal hunting regulations have contributed to a sharp decline in bear numbers and to behavioral changes, both of which combine negatively to impact consumptive and non-consumptive uses. We also observe that changes in climate appear to be responsible for environmental perturbations—e.g., blueberry crop failures and delayed salmon runs—that may compound hunting pressure on this population and may grow stronger in the future.

Before seeking to stabilize the black bear population, we advocate **restorative management** that targets restoring black bear abundance to levels approximating environmental carrying capacity, and believe that an immediate, substantial reduction in hunting pressure is warranted. We also support research to establish management prescriptions that balance *all* of the important hunting, viewing, and ecological roles black bears play in Prince William Sound.

Comments on Proposals 209, 210, 211

We support changing the black bear hunt in GMU 6D to a registration hunt (Proposal 210) because this gives ADF&G the greatest latitude to implement adaptive management capable of responding to changing bear abundance and behavior, as well as year to year hunting pressure. It also provides a more precise tool for area biologists to regulate the take of females which, according to ADFG, is currently a growing concern.

We support shortening the fall season (Proposal 211) or, preferably, completely closing the fall hunt and reallocating these bears (approximately 20% of total harvest) to the spring hunt because in Prince William Sound bear meat is often considered unpalatable when bears forage on rotting salmon; even bears harvested away from spawning streams are typically within a couple hours travel from salmon streams and the no-salvage clause makes this a wasteful hunt. We have observed a number of bear carcasses left to rot and bait other bears on beaches during the fall, and pelts are not of optimal quality in the early fall. Alternatively, if the fall hunt is not closed, we would like to see a requirement added that black bear meat must be salvaged for human consumption. Where demand for bears exceeds supply, it may make the most sense to ensure that both pelts and meat are suitable for beneficial uses.

We do not support Proposal 209 as a stand-alone response, because we believe it would have minimal effectiveness toward reducing the over-harvest of bears--which should be the primary goal of regulatory changes. Almost 80% of the annual harvest is taken by non-repeat hunters (Charlotte Westing, personal communication,) meaning that "one bear every three regulatory years" is unlikely to stem the arrival of new hunters into PWS or the number of bears taken. We understand and respect the interests of commercial transporters and guides. However, a striking increase in access to PWS via the Whittier Tunnel and steadily expanding visitation throughout the Sound appears to have resulted in excessive hunting pressure on bears, causing population declines that are disadvantageous for all user groups. We are not arguing that bears are faced with extirpation, but that hunters and non-hunters alike are not being served well by current management. Stopping and reversing population declines should take precedence over allocation issues among different user groups.

We also urge Board members to consider eliminating hunting black bears over bait in PWS.

While this technique is appropriate in the Interior where bears are dispersed in thick cover, coastal hunting presents a very different situation, where black bears select early-emerging grasses, salt marshes and, later, salmon spawning streams. With healthy populations, this is an easy hunt with high success rates and allows hunters to take more bears than harvest targets. Also, unlike the Interior, bait stations are often located in areas where habituated bears can pose a danger to recreational users, such as kayakers.

In Summary, we urge board members to consider carefully the compelling, if still anecdotal, evidence that black bear numbers and visibility in PWS have declined markedly, coincident with a sharp increase in hunting pressure. We fully support further study to acquire accurate population data at the same time as--but not in lieu of--prompt conservation actions. In light of the biological, hunting, tourism, and recreational impacts resulting from this decline, we respectfully suggest that the evidence merits prompt and substantial changes in management to satisfy your constitutional mandate to conserve wildlife populations; a chronically depressed black bear population in Prince William Sound does not serve anyone's long-term interest.

Thank you for your efforts to ensure sustainable management of Alaska's wildlife on behalf of Alaska's diverse public.

Sincerely,

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