



May 22, 2015

An Alaska resident has submitted an agenda change request (ACR) for the Board of Game to reduce the black bear bag limit for the area in Game Management Unit 15C south and east of Kachemak Bay from 3 bears to 1 bear (ACR 4). The ACR also asks that wounded bears be counted against a hunter's bag limit. The reason stated is to reduce the harvest to prevent further declines in bear numbers and future harvest opportunity. Under the board's ACR policy the board will only accept an ACR:

- A) For a conservation purpose or reason
- B) To correct an error in regulation or
- C) To correct an effect on a hunt that was unforeseen when a regulation was adopted

The board will not accept an ACR that is predominately allocative in nature in the absence of new information that is found by the board to be compelling. [5AAC 92.005(a)(2-3)]

For the area in GMU 15C south of Bradley River, and in Bradley Lake and Kachemak Creek, the current bag limit is three bears per regulatory year for resident hunters and one bear per year for nonresident hunters. The proposed action may result in decreased opportunity for resident hunters. With respect to the ACR policy acceptance criteria:

- A) The department does not have population information for black bears but does not have a conservation concern. Anecdotal information from recreationists in the area suggests that bears are less abundant and harvest has declined in recent years. While it is likely black bear numbers have decreased in accessible areas that receive high hunting pressure (near the coast), the department believes the overall black bear population can withstand current harvest rates. Harvests are concentrated on a narrow strip near the coast line and most of the "interior" area described in this ACR has low hunting pressure.
- B) The department does not know of any error in regulation.
- C) The author of the ACR suggests that there was an unforeseen switch to GMU 15C by hunters due to changes (more restrictive) to black bear hunting in Prince William Sound (PWS) in Unit 6D. This effect may be exacerbated with the recent department emergency order closing unit 6D black bear hunting for a portion of this spring and Board action to further restrict black bear hunting in the future. Some resident hunters may have switched to GMU 15C in the past and

others may be encouraged to do so in the near future. The department does not have conservation or administrative concerns with these activities.

The department has no recommendation on the allocative nature of this proposal. Reducing the bag limit from 3 bears to 1 will likely influence some hunters to hunt elsewhere. This may also change the strategy of guides and transporters offering this area as a hunting opportunity.

The “wounded bear” aspect of the ACR may further restrict hunters (both resident and nonresident). It is unknown how often a bear is wounded but not claimed by a hunter as part of his or her bag limit. However, adoption of a proposal generated by this ACR may affect hunter behavior by hunters who take higher risk shots.

The department considered proposing changes to the black bear hunting regulations to be considered at the 2015 Region II board meeting, but chose to adopt a monitoring approach to evaluate the effects of the Unit 6D changes. Also, while we were aware of the reduced harvest and anecdotal reports, we did not feel it was time for restrictive changes. The department does not recommend that this ACR be accepted based on conservation concerns at this time.

Sincerely,

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

Bruce Dale
Director
Division of Wildlife Conservation