



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS, 673D AIR BASE WING  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

March 2, 2023

MEMORANDUM FOR ALASKA DEPARTMENT OF FISH AND GAME  
ALASKA BOARD OF GAME

FROM: [REDACTED]  
[REDACTED]  
[REDACTED]

SUBJECT: ALASKA BOARD OF GAME REGULATION PROPOSAL 91 (EG-F22-125)

1. Proposal 91 (EG-F22-125):

Issue:

Drawing permit hunt DL455 already allows the take of one black bear by shotgun only. Archery is a step down in weapon efficacy and should be considered as a means of take for this hunt. There are currently multiple archery hunts that already take place on JBER and there is no reason DL455 should exclude archery equipment. If this regulation change were to be adopted, hunters who draw this permit would be able to hunt with either a shotgun or a bow rather than only being limited to using a shotgun.

Proposed Solution:

Add bow and arrow to the legal means of take for DL455 in unit 14C as follows:

DL455

Unit 14C, portions of Joint Base Elmendorf-Richardson Management Area (former Fort Richardson portion)

One bear by shotgun or bow and arrow only by permit Sept 1-June 15

2. DL455 occurs in the GMU 14C Joint Base Elmendorf-Richardson (JBER) Management Area, managed by the United States Air Force, 673d Air Base Wing. JBER has considered and does not support proposal EG-F22-125 on the following grounds:

a. DL455 is restricted to shotgun only, a determination made in the planning and decision process in 2014 to implement a black bear hunt compatible with military mission and safety requirements. Base access procedures and hunting areas, methods, means, and conditions are designated by the 673 Civil Engineer Squadron in consultation with the Alaska Department of Fish and Game, JBER Range Control, and the 673 Security Forces Squadron with endorsement of the 673 Air Base Wing Commander.

b. The use of military land for recreation is subject to safety, security, and the military mission. It is the policy of JBER to provide public access for outdoor recreation activities and the harvest of fish and wildlife when compatible with the military mission and natural resource management objectives.

Allowing archery as a means of take in DL455 increases wounding loss potential and safety conflict. The proposal identifies archery as a step down in weapon efficacy, to which JBER concurs. Inability to quickly follow-up with a second or third shot introduces higher wounding loss potential which may result in a dangerous and aggressive black bear. A wounded black bear presents safety risks to the hunter, soldiers that may be performing land navigation and maneuvering exercises or occupying bivouac sites, as well as any other individuals in the vicinity, both on and off installation.

c. JBER currently offers five archery draw hunts (DM424, DM426, DM427, DM428, and DM430) which are moose only. Wounded moose that require trailing present less of a safety risk than wounded black bears.

d. While JBER Conservation Law Enforcement Officers and Military Conservation Agents are dispatched to locate black bears that hunters have reported as wounded, JBER does not possess the resources to respond to an increase in wounded black bear reports.

e. For all draw hunts on JBER, hunters are required to pass a weapons proficiency test. Allowing both shotgun and archery to DL455 will increase resources required to qualify hunters on shotgun and archery proficiencies. JBER does not possess the resources to support this change.

3. For the reasons stated in this letter, JBER does not support adding bow and arrow as a legal means of take to DL455 as proposed.

WILSON.DAVID.JA  
MES.1243168658

Digitally signed by  
WILSON.DAVID.JAMES.1243168  
658  
Date: 2023.03.02 15:59:34 -09'00'

DAVID J. WILSON  
Colonel, USAF  
Commander



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS, 673D AIR BASE WING  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

March 2, 2023

MEMORANDUM FOR ALASKA DEPARTMENT OF FISH AND GAME  
ALASKA BOARD OF GAME

FROM: [REDACTED]

SUBJECT: ALASKA BOARD OF GAME REGULATION PROPOSAL 93 (EG-F22-114)

1. Proposal 93 (EG-F22-114):

Issue:

Low participation and hunter success in GMU 14C black bear drawing hunts. The current regulations limit hunter to shotgun and shotgun/muzzleloader only in DL455/457, respectively. This deters a large pool of certified black bear archery hunters from applying to hunt this underutilized resource in an area that already has a successful archery hunt for moose.

Proposed Solution:

Add certified bowhunters to applicants for drawing hunts DL455 and 457.

"... (3) Unit 14(C), JBER Management Area 1 bear every regulatory year, by drawing permit Sept 1 – June 15 Sept 15 – June 15 only; by shotgun and archery only; (General hunt only) up to 25 permits may be issued Unit 14(C), that portion Sept. 1 – May. 31 known as the Anchorage (General hunt only) Management Area 1 bear by drawing permit only. Shotgun, archery, or muzzleloader only; weekdays only; up to 20 permits may be issued in the McHugh Creek area and up to 20 permits may be issued in the Upper Campbell Creek area..."

The option to also hunt with a shotgun or shotgun/muzzleloader would remain unchanged, allowing for follow up shots (if needed). This solution presents arguably less wounding loss potential than archery-only hunts (e.g., DM424).

2. DL455 occurs in the GMU 14C Joint Base Elmendorf-Richardson (JBER) Management Area, managed by the United States Air Force, 673d Air Base Wing. JBER has considered and does not support changes to DL455 in proposal EG-F22-114 on the following grounds:

a. DL455 is restricted to shotgun only, a determination made in the planning and decision process in 2014 to implement a black bear hunt compatible with military mission and safety requirements. Base access procedures and hunting areas, methods, means, and conditions are designated by the 673 Civil Engineer Squadron in consultation with the Alaska Department of Fish and Game, JBER Range Control, and the 673 Security Forces Squadron with endorsement of the 673 Air Base Wing Commander.

b. The use of military land for recreation is subject to safety, security, and the military mission. It is the policy of JBER to provide public access for outdoor recreation activities and the harvest of fish and

wildlife when compatible with the military mission and natural resource management objectives. Introducing archery to DL455 increases wounding loss potential with use of a less efficient weapon and inability to quickly follow-up with a second or third shot. While a hunter could follow up a bow shot with shotgun as proposed, bowhunters who choose not to carry a shotgun would not have this option, thereby increasing wounding loss potential. Wounded black bears are potentially aggressive and present safety risks to the hunter, soldiers that may be performing land navigation and maneuvering exercises or occupying bivouac sites, as well as anyone else in the vicinity, both on and off installation.

c. While JBER Conservation Law Enforcement Officers and Military Conservation Agents are dispatched to locate black bears that hunters have reported as wounded, JBER does not possess the resources to respond to an increase in wounded black bear reports.

d. Hunters are required to pass a weapons proficiency test for all draw hunts on JBER. Allowing both shotgun and archery to DL455 will increase resources required to qualify hunters on shotgun and archery proficiencies. JBER does not possess the resources to support this change.

3. For the reasons stated in this letter, JBER does not support adding certified bowhunters to applicants for draw hunt DL455 as proposed.

WILSON.DAVID.JA  
MES.1243168658

Digitally signed by  
WILSON.DAVID.JAMES.1243168  
658  
Date: 2023.03.02 15:59:57 -09'00'

DAVID J. WILSON  
Colonel, USAF  
Commander



**DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS, 673D AIR BASE WING  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA**

March 2, 2023

MEMORANDUM FOR ALASKA DEPARTMENT OF FISH AND GAME  
ALASKA BOARD OF GAME

FROM: [REDACTED]  
[REDACTED]  
[REDACTED]

SUBJECT: ALASKA BOARD OF GAME REGULATION PROPOSAL 96 (EG-F22-140)

1. Proposal 96 (EG-F22-140):

Issue:

Provide more black bear archery hunting opportunities in 14C. This is specifically for archers who have drawn a moose tag and could take a black bear while in the field if the opportunity presented itself. It is another way/opportunity to reduce the black bear predation on moose calves in 14C.

Proposed Solution:

Add a black bear archery registration hunt for residents & non residents in the Joint Base Elmendorf-Richardson management hunt area. These registration permits would be made available only to those hunters who draw a moose tag and hunt by bow and arrow. The permits and hunt period would remain valid while the moose draw tag is valid.

2. DL455 occurs in the GMU 14C Joint Base Elmendorf-Richardson (JBER) Management Area, managed by the United States Air Force, 673d Air Base Wing. JBER has considered and does not support proposal EG-F22-125 on the following grounds:

a. The existing black bear hunt on JBER (DL455) is restricted to shotgun only, a determination made in the 2014 planning and decision process to implement a black bear hunt compatible with military mission and safety requirements. Base access procedures and hunting areas, methods, means, and conditions are designated by the 673 Civil Engineer Squadron in consultation with the Alaska Department of Fish and Game, JBER Range Control, and the 673 Security Forces Squadron with endorsement of the 673d Air Base Wing Commander.

b. The use of military land for recreation is subject to safety, security, and the military mission. It is the policy of JBER to provide public access for outdoor recreation activities and the harvest of fish and wildlife when compatible with the military mission and natural resource management objectives. Allowing archery as a means of take through a black bear registration hunt increases wounding loss potential and safety conflict. Inability to quickly follow-up with a second or third shot may result in a wounded and dangerous, aggressive black bear. A wounded black bear presents safety risks to the hunter, soldiers that may be performing land navigation and maneuvering exercises or occupying bivouac sites, as well as anyone else in the vicinity both on and off installation.

c. JBER currently offers five moose draw hunts (DM424, DM426, DM427, DM428, and DM430) totaling to 98 permits for the 2023-2024 regulatory year. Adding a registration black bear hunt for JBER's moose draw hunt winners would significantly increase potential wounded black bear reports. JBER Conservation Law Enforcement Officers and Military Conservation Agents are dispatched to locate black bears that hunters report as wounded; however, JBER does not possess the resources to respond to an increase in wounded black bear reports.

3. For the reasons stated in this letter, JBER does not support adding a black bear archery registration hunt to the Joint Base Elmendorf-Richardson Management Area within 14C as proposed.

WILSON.DAVID.JA  
MES.1243168658

Digitally signed by  
WILSON.DAVID.JAMES.1243168  
658  
Date: 2023.03 02 16:00:30 -09'00'

DAVID J. WILSON  
Colonel, USAF  
Commander



**DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS, 673D AIR BASE WING  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA**

March 2, 2023

MEMORANDUM FOR ALASKA DEPARTMENT OF FISH AND GAME  
ALASKA BOARD OF GAME

FROM: [REDACTED]  
[REDACTED]  
[REDACTED]

SUBJECT: ALASKA BOARD OF GAME REGULATION PROPOSAL 100 (EG-F22-141)

1. Proposal 100 (EG-F22-141):

Issue:

Create an archery brown bear hunting opportunity on Joint Base Elmendorf-Richardson Management Area.

Proposed Solution:

Provide a archery only drawing hunt for both residents and non residents. 1 bear every 4 regulatory years by bow and arrow only. Season to be open from September 1<sup>st</sup> through May 31<sup>st</sup>.

2. The Joint Base Elmendorf-Richardson (JBER) Management Area occurring in GMU 14C is managed by the United States Air Force, 673d Air Base Wing. JBER has considered and does not support proposal EG-F22-141 on the following grounds:

a. The use of military land for recreation on JBER is subject to safety, security, and the military mission. It is the policy of JBER to provide public access for outdoor recreation activities and the harvest of fish and wildlife when compatible with the military mission and natural resource management objectives.

b. Archery is a step down in weapon efficacy and increases wounding loss potential with an inability to quickly follow-up with a second and third shot. Aggressive wounded brown bears present significant safety risks to the hunter, soldiers that may be performing land navigation and maneuvering exercises or occupying bivouac sites, and anyone else in the vicinity both on and off installation. This would negatively impact military training as well as increase the risk to human safety.

c. Wounded brown bears present additional safety risk to JBER Conservation Law Enforcement Officers, Military Conservation Agents, and biologists who would be dispatched to locate wounded bears.

d. For all draw hunts on JBER, hunters are required to pass a weapons proficiency test and attend orientation and equipment inspection. JBER does not possess the resources to support this addition.

3. For the reasons stated in this letter, JBER does not support adding an archery brown bear hunt to the Joint Base Elmendorf-Richardson Management Area within 14C as proposed.

WILSON.DAVID.JA  
MES.1243168658

Digitally signed by  
WILSON.DAVID.JAMES.1243168  
658  
Date: 2023.03.02 16:00:53 -08'00'

DAVID J. WILSON  
Colonel, USAF  
Commander