

ALASKA

PROFESSIONAL HUNTERS ASSOCIATION, INC.

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Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the January meeting in Ketchikan. The APHA's members rely on fair and predictable allocation to non-resident hunters based on defensible biological parameters that are in line with the principles of sustained yield and result in a maximum benefit to ALL users. APHA maintains its support of the Board's current allocative policies and believes that the well defined, species specific, resident preferences are in the best interests of all Alaskans.

Guided Hunt Allocation Benefits Resident Hunters, Visiting Hunters, Guides & Non-hunters

APHA commissioned its first socioeconomic report with the McDowell Group in 2014, titled "*Economic Impacts of Guided Hunting in Alaska*." More recently (2019), APHA partnered with Dallas Safari Club to add to and update McDowell's 2014 seminal work. "*The Economic Importance of Hunters Visiting Alaska; Alaska's Guided Hunting Industry 2019*" provides new information on funding for conservation that our visiting clients contribute to wildlife management. Guiding hunters is primarily an activity that occurs in rural areas of Alaska.

<ul style="list-style-type: none"> 91.8 Million total economic output (2019) 	<ul style="list-style-type: none"> 57.4 Million new dollars to Alaska (2019)
<ul style="list-style-type: none"> 59% of guide industry spending occurs in <u>rural</u> areas (2019) 	<ul style="list-style-type: none"> 1,380 people directly employed, total employment with multipliers; 1,890 (2019)
<ul style="list-style-type: none"> 85% Active Guides are AK Residents (2019) 	<ul style="list-style-type: none"> Visiting hunters (guided & non-guided) purchase 14% of total Alaska hunting licenses (2019)
<ul style="list-style-type: none"> Guided nonresidents represented only 3% of current licenses but 30% of License/tag revenue 	<ul style="list-style-type: none"> Visiting hunters (guided & non-guided) contribute 76% of total revenue to the ADFG wildlife conservation fund (2019)

Significance to Alaskans & Meat Sharing

Guiding hunters in Alaska has its origins in Territorial days. Because of our rich history, guides have deep roots in communities across Alaska, with many guides living in remote communities or “Bush Alaska.” APHA worked with McDowell to quantify what some of the benefits that Alaskans reap from Guided Hunting. In 2019, 31.9 million new dollars went to Alaska business that were directly attributed to Guided Hunting. This generated another 19.1 million in economic activity in the support sector. Hunting guides do what they can to share the harvest; 223,500 lbs of well cared for, high quality game meat was shared with their fellow Alaskans in 2019.

Individual Proposal Comments

Below you will find our comments on individual proposals under your consideration for Region I regulatory change. Leading up to the drafting of these comments the APHA held multiple teleconferences and invited all members to participate in the drafting of these comments. Our teleconferences were well attended with over 15 individual guides representing small Alaskan businesses participating. You will find that there are some proposals that we don’t have comments listed for. These were proposals that we felt did not directly impact guides or were outside of the group’s purview. We also chose, in a couple of instances, to group similar proposals together and combine our recommendations. While these comments represent the voice of our group, you will undoubtedly get comments from APHA members who want their individual positions considered as well. Because the APHA takes a statewide perspective when approaching Board proposals, we urge you to consider regional expertise from our members even when their position is different from that of the APHA. Finally, we thank you for your consideration and urge you to reach out to our membership for clarity and details on proposals before you, either on a unit-by-unit or regional basis. Given the opportunity, Alaska’s hunting guides will continue to bring a wealth of wildlife and hunting knowledge to the table.

Proposal 3- OPPOSE

The APHA strongly opposes Prop. 3 based on departments stated conservation and federal compliance concerns. Any reduction in reporting or harvest tracking requirements risk undercutting state wildlife management authority especially for CITES listed animals that need to be recorded and exported.

Proposal 4- OPPOSE

The APHA opposes Prop. 4 based on the departments stated conservation concerns.

Proposal 10&11- Amend

The APHA supports amending proposals 10 & 11 to reduce nonresident bag limits for deer in GMU 4 to 2 deer. We also would likely support a limit of 2 bucks. The APHA is neutral on the resident portion of these proposals.

All of the APHA's members who guide in GMU 4 for deer indicated they already have a policy in place to limit their nonresident clients to no more than 2 deer on a hunt. Our members expressed some concern over the demand for deer hunts in the lower 48 being driving by booking agents and hunt planners. Our members think there is a potential for large growth in the non-guided nonresident harvest over time. While this is not a biological concern, it is possible the amount of additional transported or lodge-based hunters could add conflict potential in the field and increase the level of conflicts with residents.

If the board is concerned about non-guided nonresident harvest and conflicts from that use and if the department data shows such a potential exists, consideration of a 1 buck nonresident season is likely warranted or moving to a nonresident registration hunt to begin tracking deer hunting usage and commercial service expansion.

The APHA agrees with the department that current seasons and bag limits do not pose a conservation risk to deer populations in GMU 4. Proposals 10 & 11 are purely allocative in nature. However, the board is empowered to address crowding and hunter conflicts in the field by regulation if those conflicts are real.

Proposals 12,13&14- OPPOSE

Introduction:

The APHA strongly opposes proposals 12,13&14 because action on these proposals would upset careful compromises housed within the Unit 4 Brown Bear Management Strategy (BBMS). APHA and individual guides were party to the original development and implementation of the Unit 4 BBMS. This plan was developed by consensus and then adopted by the Board of Game (BOG). Subsequent to the implementation of the BBMS the Tongass NF considered their portion of the plan housed in the regulatory package "Shoreline II." These two regulatory packages combined to unify bear conservation objectives and landowner limitations on hunting guide use. APHA participated and supported both state and federal implementation of this plan. As such, the APHA cannot support and must oppose efforts to change individual changes to the plan or risk breaking good faith with the other stakeholders who worked hard to develop the plans. The result of the Unit 4 BBMS and Shoreline plans has largely been a success. Hunting for brown bear has continued at sustainable rates across GMU 4, communities have managed human/bear interactions in more positive ways, bear viewing areas closed to hunting have been minimized and collaboration between tour operators and hunting guides has occurred to reduce conflicts during shoulder seasons where hunting and non-hunting tours are happening simultaneously.

Proposal 12- OPPOSE

Prop. 12 seeks to open Mitchell Bay to brown bear hunting. The Mitchell Bay closed area is largely private native lands with some public land interspersed. Absent support from the principle landowner, APHA sees this proposal as having the potential to drive more conflict between residents of Angoon and non-local sport hunters. Originally the Mitchell Bay closed area was developed and designed by the Unit 4 BBMS team to address private landowner concerns as well as potentially provide some bear viewing economy in the immediate vicinity of Angoon. Because of the trespass concerns and the fact that this option would result in less public land being considered for brown bear hunting closure it was accepted and incorporated by the BBMS. Opening a state bear hunting season without collaboration between the state, Tongass NF and the private landowner in the Mitchell Bay area could break trust in BBMS while at the same time not achieving any real-world additional hunting opportunity.

Proposal 13- OPPOSE

The APHA opposes Prop. 13 based on the departments stated conservation concerns. Additional hunting late spring hunting opportunity west of Hoonah has the potential to exceed set brown bear harvest parameters. If harvest exceeds harvest levels set in the BBMS the department will exercise its EO closure authority for the entire GMU 4. EO closures are especially harmful to clients who have booked, in some cases years in advance, valuable bear hunts.

Proposal 14- OPPOSE

The APHA opposes Prop. 14 because it proposes to change boundaries set and agreed to in the BBMS. Currently brown bear hunting is supported by residents of Pelican. We are concerned that the inclusion of Lisianski into the “outside waters” has the potential to drive unnecessary conflict in the immediate area of Pelican. If a change is warranted it should be carefully considered and informed by input from the BBMS stakeholders and the community of Pelican.

Proposal 25- Amend/Support

The APHA supports amending Prop. 25 to “residents only.” Black bear are a non-guide required species and in recent years there has been a significant increase in interest and participation from non-guided nonresidents black bear hunters in the region. Given the proximity of the area to Petersburg this proposal has the potential to generate significant interest from DIY hunters. Guides report localized black bear hunt quality declines in GMUs 1,2&3 attributed to grown in non-guided nonresident harvest. Amending Prop. 25

to ONLY residents allows for a careful, phased approach to offering new black bear hunting opportunity in the Petersburg vicinity. Hunter effort and harvest can then be reviewed and analyzed to determine if additional opportunity is warranted. The APHA supports a careful, phased approach to opening the Petersburg Creek closed area to black bear hunting.

Proposal 26- Neutral

The APHA understands the department already has the ability to adjust drawing tag numbers on Kuiu and Krupreanof islands to achieve conservation objectives. APHA members who guide black bear hunters in GMU 3 have been reporting diminished hunt quality and that they are reducing hunt numbers to adjust. Guides are concerned that current harvest levels are too high to maintain robust numbers of trophy black bears on these islands. We urge the BOG to carefully look at harvest levels on the islands and understand the department's plan moving forward. At this time it appears Prop. 26 is unnecessary, permit numbers can be reduced. If this is not accurate we encourage the BOG to give the department the tools it needs to maintain trophy quality black bears in GMU 3.

Proposal 44- OPPOSE

The APHA strongly opposes Prop. 44 based on the departments conservation concerns.

Prince of Whales Wolf- Proposals 45-54

Support- Prop. 47

Oppose- 46, 48, 49, 50, 51, 52, 53, 54

Amend- 45

Discussion:

The APHA is concerned about the petition to list Alexander Archipelago wolves under the *Endangered Species Act* and has filed comments in opposition to this effort. We do not see the ESA listing or necessary. In fact, our members report healthy to abundant wolf populations in GMU 2 and the rest of SEAK. Our position on proposals 45-54 is offered in the spirit of refinement and continuing to update world class management programs for an elusive and hard to count predator living in a temperate rainforest. The APHA would like to see the board work with ADFG during this meeting to make sure population objectives are up-to-date and reflective of current science and understanding (amend proposal 45). We would like to see shorter reporting periods when wolves are harvested so in season management is most effective (support proposal 47). We are opposed to unreasonable loss of opportunity or reverting back to archaic management practices (oppose proposals 46, 48, 49, 50, 51, 52, 53, 54).