

Submitted By
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Submitted On
2/2/2015 6:40:53 PM
Affiliation

Proposal #210 – Oppose

Proposal 210 was inserted very late in the game with very little opportunity for public awareness of the proposal and will inject enormous uncertainty into every consumptive user's plans and can potentially devastate commercial operators whose businesses depend on a reliable season to fulfill their contractual obligations.

Dear Board of Game Members,

I would like to apologize for the late date I'm submitting my written comments. It wasn't until the two week deadline had passed that I was made aware that 210 was proposed and subsequently accepted as an agenda change request.

My name is Greg Jennen. I own and operate Alaska Glacier Mountain outfitters, LLC. My company has been operating in unit 6D for over a decade under a Chugach national Forest Priority use permit. From Valdez, we offer vessel based guided hunting trips in Prince William for brown and black bears in the spring and mountain goats in the fall.

Our black bear hunts are conducted after the close of brown bear season May 25 thru the end of black bear season June 10. Beginning in about 2008 we phased out our fall black bear hunts due to a severe lack of fish and subsequent lack of feeding bears on the streams of every bay of northwestern PWS. (This has persisted to this day) Later, the fall season was curtailed 10 days by F&G due to excess percent sow harvest during the fall season. It's fairly self-evident in our experience that the lack of substantial spawning salmon runs in is a mitigating if not the prime factor involved in the bear population decline.

Beginning in 2007 we have kept a record of the date and location of every single bear sighted on every hunt we do. In 2009 there was an abrupt decline in the average number of bears sighted, not a steady downward trend moving forward beyond 2009. As an example, in 2007 we spotted 26 bears on our June bear hunt; a good representative average. Last year (2014) we spotted 32 bears on this same trip. However our success rate was 100% in 2007 and only 25% in 2014. The reason being that virtually all of the 32 bears we spotted were over 2,000 feet MSL in the alpine eating over-wintered berries due to a profound lack of snow beginning the day the bears woke from hibernation and moving forward until the seasons end. Certainly there is a downward trend in the PWS black bear population, but spring 2014 harvest statistics need to be taken with a grain of salt if not discarded outright due to the conditions.

Proposal 210 would be a huge change in the regs, coming into the public eye at a very late date with very little opportunity for the public to educate themselves on the issue and to make comment. I personally only became aware of it through chance due to the fact that a good friend from Cordova caught wind of it at the regional advisory meeting held in there at the end of January. I know of no one from Valdez or anywhere else in PWS that was made aware of the proposal before now. Any proposal of this magnitude should be afforded a good opportunity to be discussed by the public before it makes it way to the board. In past years large changes in 6D regs were preceded by notice to most interested parties residing throughout the unit. This has not been the case here.

A registration hunt is the least favorable remedy to the decline in the black bear population in PWS for every user with the exception of non-consumptive. For resident hunters planning a vacation it would mean days taken from work would likely be for naught once the season closes weeks early as it surely will. Reservations with transporters would have to be cancelled potentially losing hunters deposits. Baits will need to be removed early or not placed in the first place and gear purchases and boat rentals will have been wasted.

From a commercial use point of view it will be devastating. Most transporters and Registered Guides are booked years in advance. (Personally, we're book through 2016) This will mean hunters will have flights booked, hotels reserved, licenses purchased and vacation days taken off only to have nowhere to go and nothing to do. For commercial operators this means any hunts booked will have to be refunded at the very last minute, once most of the expenditures for the trip have been paid and the operators can least afford it. Rescheduling the hunt to the following year will only conflict with the next year's bookings and postpone the likelihood of another disaster piled onto the previous years.

The irony of the situation is that this is all well-trodden ground. Southeast Alaska has very similar circumstances and has experienced very similar problems. It would seem obvious that the well-considered, successful plan used in recent years in Southeast Alaska should be the path taken in PWS. Not a rushed decision slipped in under the radar that will inject an incredible amount of uncertainty into every consumptive user's plans, be those users resident or non, commercial or recreational.

Regretfully I'm unable to attend the meeting in person. Currently I'm on the trade show circuit marketing my business. Were I aware of the agenda change request earlier perhaps I could have made arrangements. Or at minimum submitted my written comments before the 2 week deadline. Unfortunately, I've learned after many calls to other concerned folks, that I'm not the only one in this regrettable situation. Hopefully the cooler heads will prevail and a good, long-term, reliable fix will be compromised on without the impulse to just do *something*.

Best Regards,

Greg Jennen