

First of all – thank you to everyone whom has taken the time to speak with us and share information. Based on several discussion with many people our understanding of the issue has changed dramatically.

It appears that the taking of bear cubs and female bears with cubs is not intentional, not cultural and not traditional. Rather, it is accidental and unfortunate. Occasionally this occurs when the intent is to hunt a male bear in its den. Due to the dark den, dangerous circumstances, and restrictions on lighting – when hunting a bear in the den for traditional and cultural (subsistence) purposes occasionally by mistake this tragic event occurs.

Evidently there are approximately 10 individuals performing den hunting at this time. From what we have learned, the native peoples *always* target male bears. It is in fact against tradition to hunt cubs or female bears with cubs, and it is tremendous bad luck when it occurs or even to discuss that event. Originally the activity of hunting bears in their den was part of a coming of age ceremony. In some cases this continues as that tradition today, however, primarily den hunting is performed now as a subsistence activity.

The times of year this activity is permitted is designed to minimize chances of encountering a female bear with cubs during den hunting activity.

The specific GMUs in which this practice is permitted and restriction to Alaskan residents is designed to restrict this activity to those native people living in those specific areas.

The reason for the AAC as it is phrased today is intended to preserve this activity and not impose potential severe criminal consequences when a female bear with cubs is accidentally taken, nor label such an unfortunate event as a criminal act thus disrespecting tradition.

Unfortunately, the way this AAC is currently structured and phrased it gives the outside world the wrong and negative impression that cubs and female bears with cubs are being *intentionally* targeted as part of cultural and traditional use – when we have learned in fact the opposite is true.

We will do what we can to help educate the public on the reality of the situation. We have had multiple productive conversations with both Advisory Council representatives and native members. We will continue to explore opportunities to learn and educate the public on this topic.

Perhaps also there is a way to change the wording of the AAC to more accurately reflect the reality of the situation, while keeping the existing outcome and protections for traditional and cultural use. We will offer what assistance we can in such an effort more for the sake of improving public perception rather than instituting any effective change.

In addition, given the inherent risk of killing bear cubs and female bears with cubs in the practice of den hunting and the measure of preventative caution native peoples take to avoid that, we would like to also explore what protections and mechanisms are in place to prevent the den hunting practice from being performed by non-native residents for non-subsistence purposes.

Although we are appreciative, and have learned much regarding traditional and cultural use and accidental taking of bear cubs due to den hunting – we have as yet still not explored Exception #2 which permits taking of bear cubs and female bears with cubs currently in the AAC the way it is structured does not fall under “traditional and customary use” nor does it mention hunting at a den site.

**(2) FROM JULY 1 THROUGH NOVEMBER 30 AND MARCH 1 THROUGH JUNE 30 IN UNIT 25(D).**