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March 8, 2019

Ted Spraker, Chair
Alaska Board of Game
49230 Victoria Avenue
Soldotna, AK 99669

Re: Sub-Unit 9B Season Change

Dear Mr. Spraker,

I write in advance on the upcoming Board of Game meeting scheduled for the weekend of March 16, 2019. At that meeting, the Board will address the Agenda Change Request for Unit 9B on the Alaska Peninsula. My intentions are to attend and present at this meeting. However, I feel the need to touch base with you on a few important facts which I hope will facilitate the Board in reaching the proper conclusion with regard to Sub-Unit 9B.

I am a Master Guide and have guided on the Alaska Peninsula for 50 years in all five sub-units of Unit 9. I ask you to consider these points as background on the issue before the Board meets next week:

1. **Sub-Units require different management.** The State of Alaska has designated Units by geographical and climate diversity so that game can be managed appropriately for the circumstances specific to each Unit. However, the State of Alaska has also acknowledged that within each Unit are Sub-Units with different geography and conditions and, as a result, game must be managed differently within Sub-Units.
2. **Sub-Unit 9B does not suffer the same conditions as Sub-Units 9C, 9E, and 9D.** Sub-Unit 9B is located further north on the Peninsula than Sub-Units 9C, 9E, and 9D. The geographic and seasonal conditions in 9B differ from the other Sub-Units. Because Sub-Unit 9B is located further North and offers a different habitat for bears than the southern sub-units, the winter cold sets in sooner in late September and early October. This means that the bears in Sub-Unit 9B historically hibernate sooner than the bears in the other Unit 9 sub-units. These differences have long been recognized by the State of Alaska in game regulation and management. For example, for decades Sub-Unit 9B's bear hunting season has opened earlier, on September 20th, whereas Sub-Units 9C, 9E, and 9D have opened on October 1st.

Further, it has been established that Sub-Unit 9B enjoys a healthy bear population and does not have the same "winter kill" problem as 9C, 9E, and 9D.

To illustrate this point: Sub-Unit 9B is just 10 miles southeast of Sub-Unit 17. 9B and 17 are very similar in terms of bear population, harvest pressure and geography. In fact, 9B

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is far more similar to Unit 17 than it is to Sub-Units 9C, 9E, and 9D. With population and conditions similar to Sub-Unit 9B, Unit 17 enjoys a bear hunting season that spans from August 20-May 31. Unit 17 allows a harvest ticket, not a registration hunt, for residents and non-residents, and hunters are allowed to harvest **two bears every year** as opposed to the restriction of one bear every four years in Sub-Unit 9B. I point this out only to demonstrate that 9B's bear population and conditions are 1) healthy and not at risk, and 2) the conditions in Sub-Units 9C, 9E, and 9D are entirely different from those in Sub-Unit 9B.

3. **The changes necessary for management of Sub-Units 9C, 9E, and 9D should not be applied to Sub-Unit 9B.** Last Spring, the Board appropriately noted that there was a "winter kill" issue in Sub-Units 9C, 9E, and 9D. As a result, the Board decided to adjust the Fall bear hunting season to reduce the 9C, 9E, and 9D season by 7 days. However, during the course of the meeting, the change that the Board intended to put in effect for the Sub-Units where the "winter kill" concern applied was inadvertently made for the entire Unit 9.

To make matters worse, because Sub-Unit 9B's bear season dates were always different than Sub-Units 9C, 9E, and 9D, the unit-wide change drastically reduced Sub-Unit 9B's bear season by 17 days. Thus, Sub-Unit 9B, has suffered an even higher restriction than the sub-units with population/winter kill concern.

This loss of 17 days equates to virtually no bear hunting season due to Sub-Unit 9B's colder geographic climate. Bears in Sub-Unit 9B historically hibernate sooner than the other sub-units in Unit 9. And if we have a cold fall, well, forget it. Thus, 9B, the sub-unit with a robust bear population, with massive areas of bear refuges where the bears are protected, which has no "winter kill" problem, loses 17 days of bear harvesting opportunity.

4. **We believe the Board did not intent the restricted season date change to affect Sub-Unit 9B and ask that the 9B Season be returned to the previous date range.** We agree with and understand that maintaining good game population is essential to management. According to biologists, our Request in no way disrupts this management. Rather, our Request is consistent with the appropriate management approach and the Board's intent. If the error is not corrected, the financial consequences to the State of Alaska, Native Corporation, the guides, air taxis, and the community at large will be devastating. But these are devastating consequences that are still totally avoidable.