

**Board of Game Direction on Black Bear Guide Allocations and Harvests
in
Southeast Alaska**

(Based on decisions made at the November 2010 Region I Board of Game meeting)



December 2011

**Alaska Department of Fish and Game
Division of Wildlife Conservation
P. O. Box 110024
Juneau, AK 99811-0024**

Introduction

Black bear harvests throughout much of Southeast Alaska (Region I) have increased over the past decade or more. With a paucity of quantitative data about these populations and their status, the Alaska Department of Fish and Game (department) has had to rely heavily on harvest data and anecdotal information from hunters to assess and evaluate black bear populations. Recent declines in black bear harvests, following a long-term trend of increasing harvests, raised concerns by the department about whether black bears were being managed at sustainable levels. This, along with concerns expressed by agency biologists, big game guides, hunters, lodge owners, and members of the general public about what appeared to be fewer bears in parts of the region, prompted the department to seek regulatory action to address black bear harvests through the Alaska Board of Game (Board) at its November 2010 meeting in Ketchikan.

At that meeting, the department submitted a proposal (#36) to address black bear conservation concerns in portions of the region. That proposal consisted of 5 possible actions, which could be implemented individually or in combination:

- 1) Implement a draw hunt for non-residents;
- 2) Close the fall (Sept. 1-Dec. 31) hunting season for non-residents;
- 3) Close the June portion of the spring hunting season for non-residents;
- 4) Extend the controlled use area for Game Management Units (Unit) 2 and 3 through October; or
- 5) Close bear baiting in Units 1A, 1B, 2 and 3.

The Alaska Professional Hunters Association (APHA) submitted an alternative proposal (#37), which would require a drawing permit for non-resident black bear hunters who did not enlist the services of a registered hunting guide. Their contention was that there was not a limit on unguided nonresident hunter effort as witnessed by escalating bear harvests by independent unguided hunters as well as those enlisting the services of transporters and outfitters. At the same time, they pointed out that the guides were held to a limited number of hunts by the United States Forest Service (USFS).

During testimony on the issue, the Board asked the department to provide estimates of bear numbers and bear densities for geographical areas of concern or areas that were believed to constitute discrete management areas. This information was tabulated and provided to the Board in a table (Record Copy 41) that originally divided Units 1-5 into 10 management areas. Subsequent to the Board meeting, and in response to the department's desire to maximize black bear harvest opportunities in Unit 1C, the table was revised to include separate totals for the northern and southern portions of 1C (Appendix A, with 11 management areas). Also, although Unit 5 is included in Appendix A, it does not appear in the subsequent appendices. This is because the department removed Unit 5 from this process since the black bear harvest in that unit is believed to be at a sustainable level, and the department does not anticipate hunters or guides

shifting hunting pressure to that unit. Thus, with the addition of an additional area in Unit 1C and the deletion of Unit 5, all appendices subsequent to Appendix A contain 10 management areas. Appendix A not only provides estimates of black bear densities and population sizes by area, but also provides a 10-year mean annual hunter harvest (regulatory years 2000-2009) for each area, along with the corresponding estimated harvest rates in those areas.

After reviewing the tabulated data (the precursor to Appendix A), the Board directed the department to use regulatory years 2007-2009 as base years for analyzing harvest data by residency and guided versus unguided hunters (Appendix B). This was the first step in considering allocations of bear harvests among residents, and guided and unguided nonresident hunters. The same time period (2007-2009) was used when considering the allocation of harvests among geographic areas. From data in this appendix, the department then produced two more appendices, one of which portrays the recommended guided hunt allowances by area (Appendix C), and another that provides the baseline for numbers and distribution of draw permits the department would make available to unguided nonresident hunters (Appendix D). The process of arriving at these numbers began by calculating the mean annual black bear harvest during the years, 2007-2009.

During deliberations, the Board voted to TAKE NO ACTION on proposal #36 and adopted proposal #37. With the adoption of proposal #37, non-resident black bear hunters without a guide will be required to possess a drawing permit prior to hunting black bears in units 1-3. By adjusting the numbers of permits issued, the department will now have the ability to control the numbers of bears taken by unguided nonresident hunters. At the same time, the Board and the department expect guides to limit their harvests of black bears to the mean annual harvest they experienced during 2007-2009. This was explained in a letter from the Board chairman to the USFS' Forest Supervisor (Appendix E). The number of bears taken by individual guides will be limited in two ways. First, guides will be expected to limit their annual harvests to the mean annual harvests they experienced during 2007-2009. Additionally, guides will be expected to limit their harvests geographically based on each guide's previous harvest distribution within management areas identified in Appendix A during the 2007-2009 base years.

The department has established the numbers of unguided nonresident draw permits to be made available for each geographic area during regulatory year 2012 (Appendix F). These numbers are similar to those presented in Appendix D for all areas except Unit 2, where the department felt it appropriate to further restrict the numbers of permits available during the first year of the drawing permit's implementation.

Implementation of the Promulgated Regulation

Implementation of the Board's promulgated regulation will take effect in July, 2012, in conjunction with the draw permit requirement for unguided nonresident black bear hunters.

Until then, guides can operate as they have in the past, using the hunt allowances provided by the USFS. Prior to July, 2012 there will be no further harvest restrictions imposed on guides beyond those allowed under their USFS hunt allocations, but it is hoped there is recognition of the existing conservation concerns and that guides will not exacerbate the issue. Doing so could result in additional restrictions on all users in the future.

Other details associated with implementation of the regulation are as follows:

Allocation by area: As provided in appendices A-D, the department has identified 10 geographic areas that it feels should be treated separately for the purposes of managing black bear populations. The Board used the mean annual number of harvested bears/year/area for the period 2007-2009 as a starting point for assessing harvestable surpluses (Appendix B). The Board then used department figures to establish the allowable number of bears to be taken by residents, guided nonresident hunters, and unguided nonresident hunters in each of the 10 geographic areas. Guide harvests/year within each specified area was derived using the average annual harvest by guided hunters during the period 2007-2009. These numbers were then used to establish the maximum number of bears that guided hunters would be allowed to harvest in each area.

Allocation by guide: The Board took the mean annual number of bears harvested by each individual guide during the period 2007-2009, and used this mean to set annual bear harvest limits for each guide within the 10 black bear management areas. Each guide, therefore, will be expected to adhere not only to individual annual harvest limits, but also to their average historical harvests from each of the 10 established areas, based on their mean annual harvests during 2007-2009. While the allocation of permits to the guides by the USFS is not expected to change, each guide will have a maximum allowable harvest of black bears irrespective of their USFS permit allocations.

How will we control the number of harvested bears by area or by guide beginning fall 2012? The department will use a 3-year running mean to enforce the harvest limits set for each guide based on the mean harvest observed during 2007-2009. The 3-year running mean will always include the most recent year plus the two preceding years. It would thus work in this way: if the mean annual harvest allowance in a given area for a guide is 10 bears, then over a 3 year period, the guide must not exceed that mean level of harvest. If, for example, in year one the guide takes 11 bears and in year 2 takes 11 bears, then in year three only 8 bears may be harvested, for a total of 30 bears over the 3 years and an overall mean of 10 bears per year.

By guide and area:

If a guide exceeds his/her allowable harvest in one year, it will be up to that guide to limit their take over the next 2 years to assure that after 3 years their harvest does not exceed their allowable harvest (based on the 3-year mean annual harvest during 2007-2009). Nor are they to exceed their allowed harvest

by area. So, if a guide took an average of 5 bears from area “A” and 5 bears from area “B” during 2007-2009, they must adhere to that distribution of harvest into the future. That is, they cannot take 6 bears from one area and 4 from the other.

In addition to being limited to a maximum allowable harvest over a 3-year period, each guide will have their harvest distribution limited geographically within the black bear management areas defined by the department in Appendix C. In other words, each guide will be limited not only to a maximum number of bears/year, but also to a maximum number of bears/area. Failure of guides to respect these guidelines (e.g., exceed their historical harvest levels) will result in critical reviews by the USFS and could result in reduced hunt allocations. Should this fail to get harvests within sustainable levels, other options, such as implementation of drawing permits for guided hunters, could become necessary.

Hunting guides and the USFS: Will this new management approach require changes in permit allocation to the guides by the USFS?

No. Based on the outcome of the Board meeting, each guide will be expected to limit his or her harvests to the mean harvest levels they experienced during 2007-2009. This puts the onus directly on the guides to limit their harvests to specified levels regardless of their allowable USFS hunts. The department is not concerned with the number of hunts being conducted, only with the numbers of bears being harvested.

Future direction

These guidelines were the product of numerous discussions with guides, APHA members, and local hunters at the November 2010 Board of Game meeting in Ketchikan. Concessions associated with the guidelines were implemented to allow guides to operate outside the nonresident drawing permit system, recognizing the inherent difficulties guides have with booking clients under drawing permit hunts. To the extent this approach provides safeguards to black bear populations through sustainable harvest rates, it will be continued. However, failure of this approach to limit harvests of the Region’s black bears to sustainable levels will necessitate implementing alternative approaches, including the possibility of instituting drawing permits for guided hunters.

Appendix A. Black bear population and harvest assessment by management area.

Black bear population and harvest assessment by management area									
Hunt Area	Total Area (mi ²)	Estimated Bear Density (bears/mi ²)	Estimated Bear Population Size	Mean Annual Reported Harvest (2000-2009)	Unrecovered (25%)	Adjusted Annual Hunting Mortality	Estimated Existing Mortality Rate (%)	Estimated Sustainable Mortality Level (annual level)	Allowable Reported Harvest (total less 25%)
1A	2490	0.5 - 1.0	1245 - 2490	83	21	104	8.0 - 10.0	124	93
1B	3000	0.1 - 0.25	300 - 750	17	4	21	3.0 - 7.0	30	23
1C (North)	2250	0.2 - 0.5	450 - 1125	26	7	33	3.0 - 7.0	45	34
1C (South)	2800	0.2 - 0.5	560 - 1400	47	12	59	4.0 - 11.0	40	30
1C (Remainder)	4275	0.2 - 0.5	855 - 2137	33	8	41	2.0 - 5.0	80	60
1D	2854	0.1 - 0.25	285 - 715	32	8	40	6.0 - 14.0	40	32
2	3250	1.25	4050	388	97	485	12	400	300
3 (Kuiu)	750	1.5 - 2.5	1125 - 1875	114	29	143	8.0 - 13.0	112	84
3 (Kupreanof)	1090	1.0 - 1.5	1090 - 1635	97	23	120	7.0 - 11.0	109	80
3* (Remainder)	874	0.5 - 1.0	437 - 874	16	4	20	2.3 - 4.6	44	33
5	5800	0.1 - 0.25	580 - 1450	18	5	23	2.0 - 4.0	58	44
* Excludes Zarembo and Coronation Islands									

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Appendix B. Mean annual black bear harvest by management area, 2007-2009.

Mean annual black bear harvest by management area (2007 - 2009)				
Hunt Area	Resident	Guided	Unguided	Total
1A	48	7	37	92
1B	6	5	7	18
1C North	30	0	3	33
1C South	10	20	5	35
1C Remainder	16	4	8	28
1D	25	2	3	30
2	45	49	218	312
Kuiu	15	52	32	99
Kupreanof	18	25	37	80
3 Remainder	12	0	5	17

Appendix C. Proposed drawing permit allowances for unguided nonresident hunters by management area.

Proposed drawing permit allowances for unguided nonresident hunters by management area

Hunt Area	Resident	Guided	Unguided	Total	Harvestable Surplus	Proposed Unguided	Proposed Permits	Up to Permits
1A	48	7	37	92	95	40	80	100
1B	6	5	7	18	23	12	24	40
1C North	30	0	3	33	40	5	10	30
1C South	10	20	5	35	32	5	10	20
1C Rem	16	4	8	28	40	12	24	30
1D	25	2	3	30	32	5	10	20
2	45	49	218	312	250	155	310	500
Kuiu	15	52	32	99	84	20	40	50
Kupreanof	18	25	37	80	80	40	80	100
3 Rem	12	0	5	17	33	20	40	50
Totals	225	164	355	744	709	314	628	940

Appendix D. Proposed drawing permit allocation, by management area.

Proposed drawing permit allocation by management area			
Hunt Area	Target 2012 Unguided Nonres	Proposed 2012 Permits	"Up to" Permits
1A	40	80	100
1B	12	24	40
1C North	5	10	30
1C South	5	10	20
1C Remainder	12	24	30
1D	5	10	20
2	155	310	500
Kuiu	20	40	50
Kupreanof	40	80	100
3 Remainder	20	40	50

Appendix E. Letter from Board chairman Judkins to USFS Forest Supervisor, Forrest Cole.

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

BOARD of GAME

**SEAN PARNELL,
GOVERNOR**

P.O. BOX 115526
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January 6, 2011

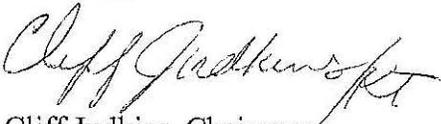
Mr. Forrest Cole, Forest Supervisor
Tongass National Forest
Federal Building
648 Mission Street
Ketchikan, AK 99901-6591

Dear Mr. Cole:

The Alaska Board of Game took actions at its November 5 – 9, 2010 meeting in Ketchikan to limit black bear harvests to sustainable levels in Southeast Alaska. Actions included allocating bear harvests to resident, non-resident guided, and non-resident unguided hunters, based on the 3-year average of harvest during 2007-2009. In order for this action to be successful, it will be necessary for the Forest Service to work cooperatively with the Alaska Department of Fish and Game to set appropriate use levels for members of the hunting guide community.

The Alaska Department of Fish and Game is prepared to share harvest data with you and your staff and to identify appropriate and sustainable harvest levels that maintain harvests at desired levels. The Alaska Board of Game urges you to work with the Alaska Department of Fish and Game to develop appropriate use levels that ensure long-term sustainable harvests of black bears by all users throughout Southeast Alaska.

Sincerely,



Cliff Judkins, Chairman
Alaska Board of Game

cc: Doug Larsen, ADF&G Regional Supervisor

Appendix F. Drawing permits allocated by management area for RY 2012.

Drawing permits allocated by management area for RY 2012	
Hunt Area	Draw Permits Available
1A	75
1B	24
1C (North)	10
1C (South)	10
1C (Remainder)	24
1D	20
2 (Fall 2012)	30
2 (Spring 2013)	80
Kuiu Island	40
Kupreanof Island	80
3 (Remainder)	40



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

Department of Fish and Game

BOARD SUPPORT SECTION
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November 9, 2012

Mr. Forrest Cole, Forest Supervisor
U. S. Forest Service
648 Mission St.
Ketchikan, AK 99901

Re: Black bear guide use allocations on Tongass National Forest lands.

Dear Mr. Cole:

At its November 2010 meeting in Ketchikan, the Alaska Board of Game (Board) made changes to regulations related to black bear hunting in the Southeast Alaska Region because of concerns expressed by Alaska Department of Fish and Game (Department) staff and the public about possible overharvesting of bears in some parts of the region. Forest Service (Service) staff was present at the meeting and offered input on the Service's big game guide hunt allocation process and capabilities. Input shared by Service staff specifically indicated that modifications could be made by the Service to the numbers of hunts allocated to individual guides. This input and assurance contributed substantially to the Board's decision to base future management assessments and modifications on "hunts" rather than on "harvests." At the time of the meeting, the Board was under the impression that the Service would not take any immediate action to modify existing hunt allocations among guides, but that it would work cooperatively with the department to make modifications if or when harvests exceeded sustainable harvest guidelines identified by the Department for ten discrete geographic areas within the region.

In his January 6, 2011 letter to you (copy attached), former Board chair, Cliff Judkins, urged the Service to work with the Department to develop appropriate use levels that ensure long-term sustainable harvests of black bears by all users throughout Southeast Alaska. This belief remains true for the Board today, and we strongly encourage you to continue to work closely and cooperatively with Department staff to monitor black bear harvest levels and make modifications to guide hunt allocations, as needed, to ensure harvests are maintained within the sustainable levels identified by the Department.

We appreciate your attention and commitment to this important resource management issue. Please don't hesitate to contact me if you have any questions about the Board's intent or desire relative to black bear harvest management in Southeast Alaska.

Sincerely,

A handwritten signature in cursive that reads "Ted Spraker" followed by a stylized initial "KS".

Ted Spraker, Acting Chair
Alaska Board of Game

cc: Doug Larsen, Regional Supervisor, Division of Wildlife Conservation, ADF&G

Enclosure



United States
Department of
Agriculture

Forest
Service

Alaska Region
Tongass National Forest

648 Mission Street
Ketchikan, AK 99901
Phone: (907) 225-3101
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File Code: 2670
Date: December 3, 2012

Ted Spraker
Acting Chairman
Alaska Board of Game
P.O. BOX 115526
Juneau, AK 99811-5526

Dear Mr. Spraker,

This letter responds to your November 9, 2012 letter, requesting the continued cooperation by the Forest Service with the management of guided black bear hunts within the Tongass National Forest.

The December 2010 Board of Game (BOG) decision was shared with the Tongass National Forest District Rangers and permit administration staff once it was published in January 2011. Before the decision was published, the concern for the sustainability for the black bear populations was also shared. I support the intent of the BOG decision.

While reviewing the available hunt record information for the guided use as evaluated by the Alaska Department of Fish and Game (ADF&G), it became apparent that the current number of hunts authorized could further impact the mortality of this species if guides were to use all of their hunts. However, it also appears that requiring non-residents to apply through a registration hunt could significantly reduce the overall effort for these hunts.

Guides have been cautioned, by the Forest Service and from area ADF&G biologists, regarding the concern for the black bear populations. Guides at the BOG meeting expressed their support for maintaining a healthy black bear population and a quality hunting experience for their clients through the BOG decision.

We are looking forward to the upcoming seasons to see if the steps in play to bring hunting mortality down to more sustainable levels without more formal action on our part will be sufficient. We will continue to monitor the effort and effects of the BOG decision with ADF&G.

My staff will remain engaged with your department to ensure the common objectives of this action are met.

Sincerely,

FORREST COLE
Forest Supervisor

cc: Doug Larsen, Regional Supervisor, Division of Wildlife Conservaton, ADF&G

