



## INTERNATIONAL ASSOCIATION FOR BEAR RESEARCH AND MANAGEMENT

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Attn: BOG Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
FAX: 907-465-6094

Re: Maintaining bear hunting closure near McNeil Sanctuary, Proposal no. 43

Dear Board of Game Members:

The International Association for Bear Research and Management (IBA) strongly favors maintaining the closure of bear hunting in the vicinity of the McNeil State Game Sanctuary. We fully support Proposal no. 43 that is under consideration by the Board of Game and would maintain the closure.

The IBA is a professional organization of over 700 biologists, wildlife managers, and others dedicated to the wise management and conservation of all bear species. The goal of IBA is to achieve sound management, conservation and restoration of the world's bears through science-based research, management actions and education. We are recognized by governments and agencies throughout the world for our expertise and for providing professional advice on matters important to bear conservation. It is in this capacity that we offer the following comments regarding bear proposals before the Alaska Board of Game.

We fully understand that data indicates the population of brown bears that includes those traditionally using McNeil River Falls and the Sanctuary is not in jeopardy. At the same time, because of their long-term habituation to humans at McNeil Falls, there is little doubt among our professional organization that these bears would be substantially less wary of hunters in the nearby area and therefore have an increased likelihood of being killed by hunters. Further, scientific studies have documented home ranges of some bears frequenting McNeil Falls extend into the Douglas Head area which is the subject of this proposal. Certainly, maintaining sustainable yield of hunted bear populations is a responsibility the Board of Game takes seriously. Similarly, the long-term integrity of the brown bear sub-population using McNeil Falls which is heavily viewed and valued by broad segments of the public should also be important.

Maintaining public support of management practices is central to effective bear conservation. The Falls supports the highest documented seasonal concentration of brown bears in the

world. Activities there provide an outstanding opportunity to gain appreciation and support for conservation of bears. Allowing hunting of bears that have habituated to human presence could well jeopardize support of legitimate management efforts. It could result in public resistance to bear conservation measures in other jurisdictions in Alaska and worldwide.

Regardless of the presently secure population status of bears in the McNeil area, individual bears are important enough to this world-class viewing area that the area should be closed to hunting. McNeil Falls is known around the world as one of the great wildlife sanctuaries for bears, along with the area for pandas near Chengdu, China, and the area north of Cape Churchill, Manitoba, for polar bears. The citizens of Alaska and the Alaska Board of Game have a responsibility to the people of the state, the nation and the world to perpetuate its values. In part because of its stature, McNeil is home to a National Geographic webcam that provides people of the world with a first-hand view of a face of wildlife conservation that has been viewed by the Alaskan and American public.

The Alaska Board of Game presently recognizes that public interest is served by regulations that protect individual animals. Hunting is prohibited for both white-phase moose in Game Management Unit 20C and white-phase black bears in Game Management Unit 1C. Maintaining a closure as submitted in Proposal 43 by the Alaska Professional Hunters Association might affect an increase in opportunity for only 3 bear hunters, compared to the annual kill of over 1100 brown bears that occurs annually in Alaska.

As we have stated in past testimony to the Alaska Board of Game, Alaska's past bear management has been held in high esteem by other jurisdictions throughout the world. Its balanced regulatory approach that focuses on sustained populations has shown that bears are a valued and integral part of the ecosystem that can be managed for a wide variety of human uses.

We maintain that this balanced approach should include maintaining the closure for bear hunting as described in Proposal 43.

Sincerely,

A handwritten signature in black ink that reads "Harry V. Reynolds" followed by a stylized flourish.

Harry Reynolds  
President, International Association for Bear Research and Management  
<http://www.bearbiology.org>