

**REGULATION PROPOSAL FORM**  
**ALASKA BOARD OF FISHERIES AND ALASKA BOARD OF GAME**  
**PO BOX 115526, JUNEAU, ALASKA 99811-5526**

**BOARD OF FISHERIES REGULATIONS**

- Fishing Area  
 Subsistence  
 Sport  
 Personal Use  
 Commercial

**JOINT BOARD REGULATIONS**

- Advisory Committee  
 Regional Council  
 Rural

**BOARD OF GAME REGULATIONS**

**Game Management Unit (GMU)** STATEWIDE

- Hunting  
 Subsistence  
 Trapping  
 Other Bear snaring

- Resident  
 Nonresident

**Please answer all questions to the best of your ability. All answers will be printed in the proposal packets along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal.**

**1. Alaska Administrative Code Number 5 AAC** 92.095 Unlawful Methods of Taking Furbearers; Exceptions **Regulation Book Page No.** \_\_\_\_\_

**2. What is the problem you would like the Board to address? Bear snaring**

The 2010 decision to list black bears as a furbearer, the ongoing liberalizations to bear snaring in Unit 16, and the dramatic changes to the Bear Management Policy this year is of great concern to many Alaskans.

Authorizing a black bear trapping season in interior Alaska, especially in areas bordering National Parks & Preserves is totally inappropriate and will invariably have a negative impact on bear populations in our National Parks & Preserves as well as present an unacceptable safety risk to the public. Bear snaring in areas of high use is not only dangerous, but is not the best and highest use of this resource. Wildlife viewing is an important part of our state's economy and brings valuable economic development to many communities and businesses around the state.

Though touted as safe, humane and effective way to kill bears, we, along with thousands of Alaskans would disagree. Bear snaring has not been legal in Alaska since statehood for many good reasons, including the following:

**Safety:** Allowing bear snaring stations as close as 1/4 of a mile from residences, roads and trails is anything but responsible and safe. There is no way for the public to know where bear snaring is taking place. Fish and Game currently does not provide a map or locations where bear snaring bait stations are located thereby putting the public at risk of inadvertently encountering a free-roaming adult or sibling of a bear caught in a snare as they recreate during the summer. The only time of year that is conducive to snaring bears correspond directly with the same time of year all types of recreationalists and tourists are in the wilderness enjoying other activities such as hiking, fishing, camping, and berry picking. As bear snaring areas expand, the danger grows that someone will get hurt; either a trapper, their 10 year old child, (who is now allowed to accompany the adult), or an innocent bystander who happens to be in the wrong place at wrong time. Snaring is indiscriminate. Young bears with mothers can be trapped. The dangers presented by a free roaming adult bear with her cub caught in a snare are unacceptable.

**Humane:** the practice of baiting a bear and snaring it is anything but humane. Testimony I heard from Fish and Game officials at a recent Board of Game meeting that bears caught in snares simply sit down and take a nap after being snared is very difficult to believe, (and since Fish and Game has been circumspect in providing information to the public, most of us do not know what actually happens at these sites). Unless there is someone attending the site, (which is not required), and can kill the bear immediately upon capture, we seriously doubt that a bear doesn't suffer as a result of being snared. Indeed, the ADF&G had to kill a brown bear due to injuries received from struggling to free itself in just a few hours of being caught in a snare in Unit 16. The fair chase ethic that many Alaskans abide by is affronted by the practice of bear snaring. Bears have been, and remain, an iconic species that deserves better treatment than this.

**Effective:** Bear snares are quite indiscriminate, allowing the capture of brown bears, sows with cubs and cubs. This method of culling is not only socially unacceptable but is inconsistent with prudent wildlife management. Bears have a relatively low reproductive rate and the taking of sows with cubs and cubs has been universally discouraged over the years. With the singular focus of Fish and Game to boost ungulate populations, there is still little evidence that intensive management works over the long term. Many areas where intensive management has been conducted has resulted in reduced twinning rates, reduced growth of calves, increased age of first reproduction, and poor body condition including starvation in extreme situations.

**REGULATION PROPOSAL FORM**  
**ALASKA BOARD OF FISHERIES AND ALASKA BOARD OF GAME**  
**PO BOX 115526, JUNEAU, ALASKA 99811-5526**

---

**3. What will happen if this problem is not solved?**

It is likely that bears will become a diminished resource as a result of the new policy. More people and pets will be faced with a public safety issue. The tourism industry will suffer. The classification of bears as furbearers is a wasteful and inappropriate use of the resource. Bears could become food-conditioned, thereby creating a potential hazard for people.

**4. What solution do you prefer? In other words, if the Board adopted your solution, what would the new regulation say?**

**5 AAC 92.095. Unlawful methods of taking furbearers; exceptions**

- (a) The following methods and means of taking furbearers under a trapping license are prohibited, in addition to the prohibitions in 5 AAC 92.080:
- (20) The taking of a black bear by trap or snare

**5. Does your proposal address improving the quality of the resource harvested or products produced? If so, how?**

Yes, bear snaring is indiscriminate method of take. A trapper can still harvest a bear under a trapping license by using a firearm and bait station to attract a free roaming bear. Under this method, a trapper can be selective in harvesting the bear and avoid taking non target species and cubs or females with cubs. Bear snaring is a wanton waste of our resources.

**6. Solutions to difficult problems benefit some people and hurt others:**

**A. Who is likely to benefit if your solution is adopted?** Alaskans and visitors who value wildlife and sound biological management of our wildlife resources, and who want the opportunity to view wildlife in our national and state parks.

**B. Who is likely to suffer if your solution is adopted?** No one will suffer. This practice only promotes waste and disrespect for wildlife.

**7. List any other solutions you considered and why you rejected them.**

Removing black bears as a furbearer. Awaiting the statewide meeting that addresses this issue.

**DO NOT WRITE HERE**

Submitted By: Valerie Connor

Name / Signature



Individual or Group

Alaska Center for the Environment

Address: 807 G St. Ste. 100

City, State: Anchorage, AK

ZIP Code 99501

Home Phone

Work Phone 907-274-3632

Email [valerie@akcenter.org](mailto:valerie@akcenter.org)

---