Form Name: December 2022 RAC Proposals Feedback Submission Time: November 27, 2022 11:36 pm

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Neither agree nor disagree

Do you have any additional comments about the recommended black bear changes?

Over all I like the proposed changes for the upcoming bear seasons. What I do have a concern with is getting rid of the baiting season for the fall hunts. I understand that there can be some conflict in the fall with hounds but I don't feel it is enough to get rid of baiting all together. My concern is that sportsmen that bait bears can do it all on their own. They don't need to hire, or be friends with, someone that has hounds. This is literally a hunt that anyone can do, not just a select few that have hounds. Hound hunters already have the spring bear season, the summer pursuit season and the falls seasons as well as lion season all winter and spring. I feel it's wrong to take a season from the DIY sportsmen. I would propose that the Bait hunt in the fall be the month of September when the hounds are not allowed to run because of the conflicts with the archery hunters. This seems like a no-brainer to me. Just let them bait when the hounds aren't in the field.

If for some reason we don't have a fall bait season then I propose that 50% of the fall permits go into the Summer bait season so that DIY sportsmen don't lose out on that opprotunity.

I strongly agree with sharing another hunters bait sites with their permission.

Form Name: December 2022 RAC Proposals Feedback Submission Time: December 1, 2022 9:19 am

December 2022 RAC Proposals Feedback December 1, 2022 10:01 am

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Strongly disagree

Do you have any additional comments about the recommended black bear changes?

Please eliminate the fall hunt, as it stresses the Bears and they may not gather enough calories to hibernate properly.

Reduce the number of hounds by half.

No non-residents allowed. Residents must be permitted.

December 2022 RAC Proposals Feedback December 1, 2022 10:03 am

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Somewhat disagree

Do you have any additional comments about the recommended black bear changes?

The LaSal Mountains are a key recreation asset and play an important role in the region's economy. Bear hunters represent a relatively small user group compared to hikers, mtn bikers, skiers and campers. With all recreation economies, it is important that one user group does not diminish the experience of other user groups or diminish the reputation of a region. To avoid the negative press involved in bear cruelty issues, the following suggestions should be further considered: 1. Reduce the number of hounds allowed to chase a bear from 16 to 8; 2. Eliminate the Fall pursuit season so bears can fatten up for the winter season without stress and wasting calories; 3. Add critical definitions to the regulations such as what "at bay," "cornering," "injury," and "waste" mean; and 4. Eliminate non-resident pursuit permits and require all persons on a chase to obtain a permit.

Form Name: Deca Submission Time: Deca

December 2022 RAC Proposals Feedback December 1, 2022 10:11 am

Which best describes your position Strongly disagree regarding the recommended changes to the black bear management plan,
Administrative Rule R657-33 and the 2023 hunts?

Do you have any additional comments about the recommended black bear changes?

The recommendations do not go far enough to reform the pursuit permit process. The regulations and statute are currently insufficient to protect our black bear communities in the La Sal Mountains unit - or to avoid user conflict with other recreationalists.

I urge DWR to reduce the number of hounds allowed per chase to 8, eliminate the Fall pursue season, better define critical terms such as "at bay," "cornering," "injury" (to include exhaustion and heat stroke), and "waste," outlaw running a bear to exhaustion by clarifying that such action constitutes injury, eliminate non-resident pursuit permits, and require all persons on a pursuit to obtain a permit.

Grand County will submit more formal comment by email to the SE RAC, which will include some of the following information:

The Grand County Attorney's Office recently prosecuted Florida dog handler William Tyler Wood for mistreating a black bear in the La Sal Mountains, which case resulted in two class B misdemeanor convictions for taking and capturing protected wildlife but an acquittal on the felony wanton destruction of wildlife charge. Mr. Wood, a non-resident, was pursuing bears in the La Sals with a Utah resident friend. While the evidence obtained in that case demonstrates the inhumane practice of chasing bears, the jury found that Mr. Wood's actions during the pursuit were legal, in large part because of the insufficiency of the regulations and statute to define critical terms and expressly outlaw running a bear to exhaustion or detaining/holding protected wildlife in a manner which prevents escape by the use of hounds during a pursuit.

For these reasons, Grand County urges DWR to both: 1) strengthen the pursuit regulations with more clear definitions and language, and 2) revise the numbers of hounds allowed per pursuit permit from 16 to no more than 8; eliminate pursuit permits in the Fall when black bears are fattening up for the winter; eliminate non-resident pursuit permits and require each person on a pursuit to obtain a permit; and require a pursuit ethics course as a condition of permitting.

Regulatory Revisions R657-33-1, Definitions

Grand County recommends DWR define "at bay" and "cornered" in Administrative Rule R657-33-1. These critical terms are used throughout the wildlife regulations and statutes, but are not defined. Definitions should include language that clearly specifies that a bear is "at bay" or "cornered" when it is unable to flee due to topography or other physical conditions, exhaustion or other physical incapacity, being overwhelmed or surrounded by hounds, or any other manipulated environment which prevents escape.

Grand County recommends DWR also add "injury" as a definition to mean an act which harms or damages wildlife. Such an act may include physical

injury, exhaustion, heat stroke, or significant habitat modification or degradation that actually injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering.

Grand County recommends DWR also add "waste" as a definition to mean to abandon or injure protected wildlife or to allow protected wildlife to spoil or to be used in a manner not normally associated with the protected wildlife's beneficial use.

Grand County further recommends that these definitions be integrated into the Utah Wildlife Code in the 2023 General Session at Utah Code § 23-13-2.

R657-33-9, Prohibited Methods

Subsection 2(a) prohibits pursuing "a single bear in repeated pursuits such that it renders the bear physically unable to escape." This language is not specific enough to prohibit the practice of running a black bear to exhaustion during any singular pursuit and could be interpreted to require proof of repeated pursuits or a physical injury. Grand County recommends DWR revise this language to include the new definition of injury (see above), such as: "A person may not pursue a single bear in a repeated pursuits such in a manner that injures the bear or it renders the bear physically unable to escape."

Subsection 2(b) prohibits restricting or hindering an animal's ability to escape once it has been pursued, chased, treed, cornered, legally baited, or held at bay and 2(c) requires a person to make "reasonable efforts" to call dogs off a bear that has been cornered or held at bay. Grand County recommends DWR revise these sections to require a person to immediately pull dogs off a bear that is held at bay or cornered and specify that the failure to immediately act constitutes restricting or hindering an animal's ability to escape.

In addition, Grand County recommends DWR move or repeat the additional prohibitions contained in R657-33-26(8) in R657-33-9 for sake of emphasis and clarity.

Pursuit Reform

Revise the numbers of hounds allowed per pursuit from 16 to no more than 8

Under a pursuit permit, unlike a hunting (aka harvest or kill) permit, dog handlers "train" hounds to track and chase black bears as a practice, usually for compensation. Current pursuit regulations at Administrative Rule R657-33-12(6)(b) permit up to 16 hounds per pursuit in the spring and fall and 8 hounds per pursuit in the summer. The hounds are often miles away from their hunter/trainer during the chase, which allows the hounds to invariably pursue and stress non-target animals including female bears with

cubs, cubs, deer, small mammals and birds as well as impact the experience of recreationalists in the La Sal Mountains. When hounds do track the scent of a bear, a pursuit with 16 dogs is not a training exercise but devolves into chaos of howling barks and unsupervised hounds for miles and hours at a time, affecting both animal communities and outdoor recreation experiences. To comply with fair chase principles, reduce user conflicts in the La Sal Mountains, and achieve consistency, R657-33-12(6)(b) should be revised to reduce the allowable maximum number of dogs to 8 in all pursuit seasons.

Eliminate pursuit permits in the Fall fattening season

Bears eat nearly all their nutrients for the entire year in the summer and fall. Utah's black bears feed intensively for three or more months just before hibernation. In Utah, hunters may still pursue black bears during this frenzied feeding period (called hyperphagia), which affects a bear's ability to survive the winter. Hounding makes bears expend energy that they need in order to survive hibernation, and hounds disrupt feeding regimes for both the bears who are chased and nearby bears who are not. Bears must shift their sleeping patterns and become more nocturnal to avoid being chased. Pursuit permits should be limited to spring and summer seasons only to protect the health of back bear communities, especially in the La Sal Mountains.

c. Eliminate non-resident pursuit permits and require pursuit permits for all

Most states in the United States have outlawed bear pursuits. This puts additional pressure on Utah black bear communities and Utah mountain ranges, as non-resident dog handlers seek to make their livelihood training dogs for compensation on Utah bears. DWR has made recent changes to reduce the number of non-resident pursuit permits, but it should go further still and eliminate non-resident pursuit permits entirely. Grand County also encourages DWR to require each person on a pursuit to obtain a permit. Doing so will close a loophole that allows non-resident houndsmen and dog handlers to pursue Utah bears with a permitted resident.

d. Require a pursuit ethics course as a condition of permitting

It appears that the 2023 recommendations from the Bear Plan Committee includes eliminating the mandatory orientation course required in R657-33-3(5)(a) (Permits for Taking Bear) - and no such education course has been required as a condition of obtaining a pursuit permit under R657-33-4 (Permits for Pursuing Bear). Grand County opposes reducing any education requirements and recommends DWR require an ethics course as a condition to obtaining a permit for taking or pursuing a bear. The ethics course should cover fair chase principles, respect for protected wildlife and other animal communities, respect and safety within mountain ranges with multiple recreational users and demands, knowledge of pursuit regulations and law, etc.

December 2022 RAC Proposals Feedback December 1, 2022 10:19 am

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Neither agree nor disagree

Do you have any additional comments about the recommended black bear changes?

- 1. Reduce the number of hounds allowed to chase a bear from 16 to 8;
- 2. Eliminate the Fall pursuit season so bears can fatten up for the winter season without stress and wasting calories;
- 3. Add critical definitions to the regulations such as what "at bay," "cornering," "injury," and "waste" mean; and
- 4. Eliminate non-resident pursuit permits and require all persons on a chase to obtain a permit.

December 2022 RAC Proposals Feedback December 1, 2022 12:04 pm

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Somewhat disagree

Do you have any additional comments about the recommended black bear changes?

Reduce the number of dogs that can be used in pursuit hunting from 16 to 8. Eliminate fall pursuit season. No non resident pursuit permits. Everyone on a pursuit hunt should be required to obtain a permit.

December 2022 RAC Proposals Feedback December 1, 2022 12:31 pm

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Somewhat disagree

Do you have any additional comments about the recommended black bear changes?

- 1) Eliminate the fall chase season.
- 2) Clarify the terms (i.e. at bay, cornering, waste and injury) so there is no chance for mis- interpretation.
- 3) Eliminate non-resident pursue permits and require all permits for all persons on a chase.
- 4) Reduce pack size from 16 to 8 unless there is a "man eating" bear on the loose. I mean, using that many dogs to reduce the time needed to tree a male bear? That sounds like a matter of "convenience" rather than anything to do with hunting or chasing.

December 2022 RAC Proposals Feedback December 1, 2022 12:58 pm

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Somewhat disagree

Do you have any additional comments about the recommended black bear changes?

I have lived in SE Utah all life near the La Sals and am horrified by the travesty that the bear hunt has become: Maybe these changes could help? 1. Reduce the number of hounds allowed to chase a bear from 16 to 8;

- 2. Eliminate the Fall pursuit season so bears can fatten up for the winter season without stress and wasting calories;
- 3. Add critical definitions to the regulations such as what "at bay," "cornering," "injury," and "waste" mean; and
- 4. Eliminate non-resident pursuit permits and require all persons on a chase to obtain a permit.

December 2022 RAC Proposals Feedback December 1, 2022 1:13 pm

Form Name: Submission Time:

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Strongly disagree

Do you have any additional comments about the recommended black bear changes?

I found it odd that the video comments on the decrease in the number of bears taken in the state since 2020, without commenting that 2020 showed a significantly higher take than any other year in the last 30 years.

But here's my comments on the proposals:

Eliminating the approval of bait sites might improve efficiency in DWR offices. But unless you suddenly have more officers in the field, it does not sound like a good idea at all. Everyone, including the hunters, knows there are very few officers out there. Many of the hunters, especially those from out-of-state, don't know these mountains. And in the La Sal Mountains, it sure seems like most of the bear hunters are from out of the area, mostly from Colorado.

Decrease the number of hounds allowed on a hunt. Before sticking with the decision to allow up to 16 hounds, consider the impacts of all those hounds running around in the mountains on other wildlife, as well as on recreationists.

Fall pursuits cause stress and decrease important feeding time. Bears that cannot sufficiently fatten up in the fall can starve. My opinion is that fall season should be eliminated. At the least, drought and mountain food production levels should be monitored and the fall hunt eliminated in years with less food resources. (If you don't have human resources to gather and evaluate that food source information, eliminate the hunt.) This consideration will become even more critical as climate change intensifies over the years.

The number of non-resident pursuit permits is too high. Non-resident pursuit permits should be eliminated.

Every person on a hunt should be required to obtain a permit. Education is key to compliance with the hunt rules and minimizing conflicts with other mountain recreationists. (And apparently hunters are primarily recreationists, as implied by the minimal use of bear meat implied in the video.)

Thank you for considering these comments.

December 2022 RAC Proposals Feedback December 1, 2022 3:57 pm

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Strongly disagree

Do you have any additional comments about the recommended black bear changes?

I urge DWR to prohibit hunting bears with dogs in the LaSals altogether due to conflicts with other recreationists in the LaSals. The LaSals are a very small mountain range that provide a broad spectrum of recreational opportunities to both locals and visitors during the entire year - all four seasons. Hunting bears with packs of dogs in such a heavily used area with thousands of non-hunter recreationists creates conflicts and the potential for serious injury or worse between the dogs and other recreationists. This practice is not compatible with DWRs regulations. I urge DWR to take a hard look at the user conflict between the use of dog packs for hunting and pursuing bears and other recreationists in the LaSals. I understand that many states have already banned the practice of hound pursuit of bears for multiple reasons. I urge the DWR to ban those practices in the LaSals. On a recent KSL newscast/video, a DWR spokesperson noted that most pursuers are self policing. The video speaks for itself; two pursuers with more than a dozen hounds were clearly not self-policing each other, but rather encouraging the dog packs to continue to harass and pursue a bear that had been chased so long by the dogs that the bear dropped to the ground and couldn't get up to get away from the dog packs. If DWR continues to allow dogs to chase/pursue bears in the LaSals, the number of dogs per person should be not greater than one. Allowing large dog packs to chase a single bear is inhumane. It is not a sport. It is not an activity that is compatible with the other recreational uses in the LaSals.

Form Name: December 2022 RAC Proposals Feedback Submission Time: December 1, 2022 3:58 pm

Which best describes your position Strongly regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Strongly disagree

Do you have any additional comments about the recommended black bear changes?

The Grand County Commission and the Grand County Attorney appreciate this opportunity to make recommendations regarding proposed revisions to the Utah Black Bear Management Plan, which affects black bear hunting in the La Sal Mountains Unit. The 2023 recommendations made by the Bear Plan Committee focus on bear (bait) hunting and do not include any meaningful and necessary regulatory changes to the bear pursuit permit regulations.

As you know, the La Sal Mountains are home to some of the healthiest black bear communities in Utah - as well as world class recreation for hunters, anglers, hikers, backpackers, runners, mountain bikers, rock climbers, birders, 4x4 enthusiasts, and equestrians. As a result, the La Sal Mountains see heavy multi-use, especially in the pursuit seasons of spring, summer, and fall seasons. Grand County is vested in protecting the health of its black bear communities as well as the safety of its recreation economy and reducing conflicts between user groups.

The Grand County Attorney's Office recently prosecuted Florida dog handler William Tyler Wood for mistreating a black bear in the La Sal Mountains, which case resulted in two class B misdemeanor convictions for taking and capturing protected wildlife but an acquittal on the felony wanton destruction of wildlife charge. Mr. Wood, a non-resident, was pursuing bears in the La Sals with a Utah resident friend. While the evidence obtained in that case demonstrates the inhumane practice of chasing bears, the jury found that Mr. Wood's actions during the pursuit were legal, in large part because of the insufficiency of the regulations and statute to define critical terms and expressly outlaw running a bear to exhaustion or detaining/holding protected wildlife in a manner which prevents escape by the use of hounds during a pursuit.

For these reasons, Grand County urges DWR to both: 1) strengthen the pursuit regulations with more clear definitions and language, and 2) revise the numbers of hounds allowed per pursuit permit from 16 to no more than 8; eliminate pursuit permits in the Fall when black bears are fattening up for the winter; eliminate non-resident pursuit permits and require each person on a pursuit to obtain a permit; and require a pursuit ethics course as a condition of permitting.

Regulatory Revisions R657-33-1, Definitions

Grand County recommends DWR define "at bay" and "cornered" in Administrative Rule R657-33-1. These critical terms are used throughout the wildlife regulations and statutes, but are not defined. Definitions should include language that clearly specifies that a bear is "at bay" or "cornered" when it is unable to flee due to topography or other physical conditions, exhaustion or other physical incapacity, being overwhelmed or surrounded by hounds, or any other manipulated environment which prevents escape.

Grand County recommends DWR also add "injury" as a definition to mean an act which harms or damages wildlife. Such an act may include physical injury, exhaustion, heat stroke, or significant habitat modification or degradation that actually injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering.

Grand County recommends DWR also add "waste" as a definition to mean to abandon or injure protected wildlife or to allow protected wildlife to spoil or to be used in a manner not normally associated with the protected wildlife's beneficial use.

Grand County further recommends that these definitions be integrated into the Utah Wildlife Code in the 2023 General Session at Utah Code § 23-13-2.

R657-33-9, Prohibited Methods

Subsection 2(a) prohibits pursuing "a single bear in repeated pursuits such that it renders the bear physically unable to escape." This language is not specific enough to prohibit the practice of running a black bear to exhaustion during any singular pursuit and could be interpreted to require proof of repeated pursuits or a physical injury. Grand County recommends DWR revise this language to include the new definition of injury (see above), such as: "A person may not pursue a single bear in a repeated pursuits such in a manner that injures the bear or it renders the bear physically unable to escape."

Subsection 2(b) prohibits restricting or hindering an animal's ability to escape once it has been pursued, chased, treed, cornered, legally baited, or held at bay and 2(c) requires a person to make "reasonable efforts" to call dogs off a bear that has been cornered or held at bay. Grand County recommends DWR revise these sections to require a person to immediately pull dogs off a bear that is held at bay or cornered and specify that the failure to immediately act constitutes restricting or hindering an animal's ability to escape.

In addition, Grand County recommends DWR move or repeat the additional prohibitions contained in R657-33-26(8) in R657-33-9 for sake of emphasis and clarity.

Pursuit Reform

Revise the numbers of hounds allowed per pursuit from 16 to no more than 8

Under a pursuit permit, unlike a hunting (aka harvest or kill) permit, dog handlers "train" hounds to track and chase black bears as a practice, usually for compensation. Current pursuit regulations at Administrative Rule R657-33-12(6)(b) permit up to 16 hounds per pursuit in the spring and fall and 8 hounds per pursuit in the summer. The hounds are often miles away

from their hunter/trainer during the chase, which allows the hounds to invariably pursue and stress non-target animals including female bears with cubs, cubs, deer, small mammals and birds as well as impact the experience of recreationalists in the La Sal Mountains. When hounds do track the scent of a bear, a pursuit with 16 dogs is not a training exercise but devolves into chaos of howling barks and unsupervised hounds for miles and hours at a time, affecting both animal communities and outdoor recreation experiences. To comply with fair chase principles, reduce user conflicts in the La Sal Mountains, and achieve consistency, R657-33-12(6)(b) should be revised to reduce the allowable maximum number of dogs to 8 in all pursuit seasons.

Eliminate pursuit permits in the Fall fattening season

Bears eat nearly all their nutrients for the entire year in the summer and fall. Utah's black bears feed intensively for three or more months just before hibernation. In Utah, hunters may still pursue black bears during this frenzied feeding period (called hyperphagia), which affects a bear's ability to survive the winter. Hounding makes bears expend energy that they need in order to survive hibernation, and hounds disrupt feeding regimes for both the bears who are chased and nearby bears who are not. Bears must shift their sleeping patterns and become more nocturnal to avoid being chased. Pursuit permits should be limited to spring and summer seasons only to protect the health of back bear communities, especially in the La Sal Mountains.

c. Eliminate non-resident pursuit permits and require pursuit permits for all

Most states in the United States have outlawed bear pursuits. This puts additional pressure on Utah black bear communities and Utah mountain ranges, as non-resident dog handlers seek to make their livelihood training dogs for compensation on Utah bears. DWR has made recent changes to reduce the number of non-resident pursuit permits, but it should go further still and eliminate non-resident pursuit permits entirely. Grand County also encourages DWR to require each person on a pursuit to obtain a permit. Doing so will close a loophole that allows non-resident houndsmen and dog handlers to pursue Utah bears with a permitted resident.

d. Require a pursuit ethics course as a condition of permitting

It appears that the 2023 recommendations from the Bear Plan Committee includes eliminating the mandatory orientation course required in R657-33-3(5)(a) (Permits for Taking Bear) - and no such education course has been required as a condition of obtaining a pursuit permit under R657-33-4 (Permits for Pursuing Bear). Grand County opposes reducing any education requirements and recommends DWR require an ethics course as a condition to obtaining a permit for taking or pursuing a bear. The ethics course should cover fair chase principles, respect for protected wildlife and other animal communities, respect and safety within mountain

ranges with multiple recreational users and demands, knowledge of pursuit regulations and law, etc.

Grand County appreciates your consideration of these recommendations in advance. If you have questions or would like a meeting to discuss these recommendations further, please contact Commissioner Trisha Hedin at thedin@grandcountyutah.net or Grand County Attorney Christina Sloan at csloan@grandcountyutah.net.

Hard copy of these comments will follow by email.

Form Name: December 2022 RAC Proposals Feedback Submission Time: December 1, 2022 4:26 pm

December 2022 RAC Proposals Feedback December 1, 2022 5:31 pm

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Somewhat disagree

Do you have any additional comments about the recommended black bear changes?

I am a hunter and fisher in the southeastern management region, and I would like to voice my opposition to the use of hounds in order to pursue and hunt black bears in our state. The release of a disturbing video depicting two men and their hounds harassing a bear to the point of exhaustion has no doubt raised the ire of many in the general public, and for good reason. However, my concerns surrounding the practice extend beyond this shameful incident; I can accept the possibility, as some have suggested, that this may have just been a couple of bad apples who do not represent the sport as a whole. What I cannot accept, however, is our collective willingness to allow this unethical practice to continue in the first place, even while state after state in the west has outlawed it. The fact of the matter is that even when the use of hounds is done "properly", it fails to meet any reasonable definition of Fair Chase. The use of dog-mounted electronic devices guiding the hunter to his/her prey is a technological overreach and does not belong in the world of ethical hunting. Please consider incorporating more Fair Chase ethics in this sport and ban the use of hounds in bear pursuit/hunting altogether.

December 2022 RAC Proposals Feedback December 1, 2022 6:02 pm

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Strongly disagree

Do you have any additional comments about the recommended black bear changes?

The 2023 recommendations made by the Bear Plan Committee focus on bear bait hunting do not include any meaningful and necessary regulatory changes to the bear pursuit permit regulations. DWR should: 1) require a pursuit ethics course as a condition of permitting; 2) eliminate non-resident pursuit permits and require each person on a pursuit to obtain a permit; 3) eliminate pursuit permits in the Fall when black bears are fattening up for the winter; 4) strengthen the pursuit regulations with more clear definitions and language, and 5) revise the numbers of hounds allowed per pursuit permit from 16 to no more than 8.

December 2022 RAC Proposals Feedback December 1, 2022 6:06 pm

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Somewhat disagree

Do you have any additional comments about the recommended black bear changes?

- 1. Reduce the number of hounds allowed to chase a bear from 16 to 8;
- 2. Eliminate the Fall pursuit season so bears can fatten up for the winter season without stress and wasting calories;
- 3. Add critical definitions to the regulations such as what "at bay," "cornering," "injury," and "waste" mean; and
- 4. Eliminate non-resident pursuit permits and require all persons on a chase to obtain a permit.

December 2022 RAC Proposals Feedback December 1, 2022 6:21 pm

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Strongly disagree

Do you have any additional comments about the recommended black bear changes?

Please stop the practice of "training" using radio collared dogs to chase bears. This is inhumane and in no way represents a fair chase. Ban bear chasing.

December 2022 RAC Proposals Feedback December 1, 2022 7:48 pm

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Strongly disagree

Do you have any additional comments about the recommended black bear changes?

I believe DWR needs to do more to balance the power between hunters and bears. I would like to see DWR reduce the number of hounds allowed to chase a bear from 16 to 8. Ample research suggests that eliminating the fall pursuit season would enable bears to fatten up for the winter season without stress and wasting calories. Can you also please add critical definitions to the regulations such as what "at bay," "cornering," "injury," and "waste" mean. And really, do we need to be providing pursuit permits to non-residents? Please eliminate non-resident pursuit permits and require all persons on a chase to obtain a permit. It's only reasonable to establish more oversight over this hunting activity.

December 2022 RAC Proposals Feedback December 1, 2022 8:10 pm

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Strongly disagree

Do you have any additional comments about the recommended black bear changes?

Please recognize the chasing of bears for "training" purposes for what it is: animal cruelty. 16 dogs chasing any animal to exhaustion and/or death can't be classified any other way. It's harmful to the bear-component of the natural environment and therefore harmful to the greater environment on the whole. It has no place in Utah, the Western United States or The Nation. Please act responsibly and as stewards of Utah's outdoors when making your decisions regarding this issue. Thank you.

December 2022 RAC Proposals Feedback December 1, 2022 8:13 pm

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Strongly disagree

Do you have any additional comments about the recommended black bear changes?

Hunting with hounds is cruel and should be discontinued. It's a shameful way to hunt.

December 2022 RAC Proposals Feedback December 1, 2022 8:52 pm

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Strongly disagree

Do you have any additional comments about the recommended black bear changes?

I'm an older retired guy, USMC Recon vet from a long time ago, and active hunter for many years. I was taught and practiced stealth, patience, solid marksmanship and respect for the game I hunted. Hunting with dogs, many wired with transponders, that wear-down and tree bears until a hunter can catch up and shoot in in an exhausted fearful state is disgraceful behavior. It doesn't matter that a small number of hunters demand to be able to continue this practice. The question on the table isn't how to modify the season, it's why this is still allowed and considered skilled sportsmanship. Last year's episode should have put a fork in it.

Form Name: December 2022 RAC Proposals Feedback Submission Time: December 1, 2022 10:07 pm

December 2022 RAC Proposals Feedback December 1, 2022 10:48 pm

Which best describes your position regarding the proposed changes to Administrative Rules R657-70 and R657-19?

Neither agree nor disagree

Which best describes your position regarding the recommended changes to the black bear management plan, Administrative Rule R657-33 and the 2023 hunts?

Neither agree nor disagree

Do you have any additional comments about the recommended black bear changes?

After watching the video posted I am absolutely sickened that is allowed to happen. I am writing to ask that you please stop this blatant attack and abuse on wildlife. Please step up protections for these creatures and increase regulations so this stops happening. I am asking that you:

- 1. Reduce the number of hounds allowed to chase a bear from 16 to 8;
- 2. Eliminate the Fall pursuit season so bears can fatten up for the winter season without stress and wasting calories;
- 3. Add critical definitions to the regulations such as what "at bay," "cornering," "injury," and "waste" mean; and
- 4. Eliminate non-resident pursuit permits and require all persons on a chase to obtain a permit.

Form Name: December 2022 RAC Proposals Feedback Submission Time: December 2, 2022 12:00 am

Which best describes your position Strongly disagree regarding the recommended changes to the black bear management plan,
Administrative Rule R657-33 and the 2023 hunts?

Do you have any additional comments about the recommended black bear changes?

I have represented non-commercial interests for the SE UT RAC in the past. I am a hunter, but not of bears or other predators. I don't think any furbearer, bear, cat or dog should be killed if they are causing no harm. Obviously i am at odds on this with SFW and their subsidiary, the Utah Wildlife Board. I am a lifelong wildlife field biologist and disagree with the premise that predator control, beyond the taking of the very few problem animals, is an ecologically sound and effective way to control or enhance populations, so i can't stomach talking anout how many innocent lives we should "take" this year. I particularly object to the fall pursuit season for bears, as well as the use of bait and hounds at any time of year. As i am sure you are aware, the bears in the La Sals are an average treed many times in a year. In 40 years of studying wildlife in Southeast Utah and having had many dozens of encounters with bears, all but two have immediately run from me once they caught my scent. Most have been terrorized by smelling a human, and two actually injured themselves running from me. Combined with a dozen or more dogs and high tech pursuit systems like radio collars, there is no sport left in this unconscionable activity. Over the years, out of state hounders have forced me off the road, verbally accosted me, and often act like they own the Abajos, Elk Ridge and the La Sals, stopping in the middle of the road wherever and whenever they feel like it, running their dogs thru my camp, leaving their dilapidated tree stands and disgusting bait cans all over the forest. The bears are traumatized, the public is traumatized, even the dogs are traumatized. I have returned half-starved radio collared dogs to their owners a half dozen times, often only to see them get immediately abused. Two years ago on Elk Ridge i had a head-on on a blind curve with 5 truckloads of bear-hunting boys from out of the county that necer saw me and hit me in my lane doing 35 mph, totalling my truck and sending it backwards 15 feet after deploying every airbag in the vehicle.

Turns out they were hot on the trail of a dog collar that was going off because it was stationary- in Dark Canyon, the only designated Wilderness in Southeastern Utah. If bears don't have refuge in Dark Canyon, where can they find it? Is it right to torment and harrass bears everywhere they live, to give them no place they can get away from the torture witnessed in the recent footage released of hounders in the La Sals? Has Utah become the place where people from all over the nation come to abuse bears? People love to come to Moab. Bear hunters too, from the unbelieveable number of out of state people pursuing bears on the mountain.

DWR and WB need to become responsible and deal with the many aftershocks coming from an out of control "sport" that has no ethics, self control or value and is creating a lot of ugly incidents with the peaceful, low impact users or the forest. The time has come (or is it long past?) when the WB must restrict or outlaw hound pursuit, denning, baiting and the fall season on bears. To not do something to address the issues being raised by non-hunters and bear-lovers is downright demonic. To blame the public's presumed ignorance about the reasons so many dogs are allowed in pursuit is to completely ignore their desire to not be harrassed

themselves or have the bears that live free lives And is there really a need to point out that baiting makes it more likely that bait-taking bears will raid camps that smell like that bait?!? Also, by avoiding the "pretty heavy workload" of checking the bait sites and justifying that by saying "most" sites are "good" is just a pathetic way to avoid doing the job of catching those sites that are NOT "good". You wouldn't really expect MOST sites to be "bad", would you?!?

Which best describes your position regarding the 2023–24 furbearer recommendations?

Somewhat disagree

Do you have any additional comments about the furbearer recommendations?

The pompous arrogance is palpable in the presentation, and the polite, respectful presenter doesn't even realize it. We are "letting beavers help us to do that restoration" as opposed to recognizing that humans wiped out the beavers and put way too many cows out to pasture and now mother nature is attempting to recover the place with her allies, willow, beaver and precipitation. Maybe humans could humbly attempt serving a role in this multi-species task force?

I'm glad the beaver are finally being valued. I hope some generation, Utahns come to value ringtails, bobcats, martens, badgers and the rest for their valuable roles and we stop killing them for no reason in the dreadful numbers Utah racks up, hopefully before they go the way of the ferret, sage grouse, fisher, wolf, wolverine, lynx and grizzly. Don't you guys ever get sick of all the killing?