

Burgos, Alexander N

From: Rules, Oah
Sent: Friday, May 13, 2022 12:13 PM
To: Burgos, Alexander N; Duke, Lawrence
Subject: FW: [External] 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

From: Stephen Vick <stephen@acorn-oak.com>
Sent: Friday, May 13, 2022 12:06 PM
To: Rules, Oah <oah.rules@oah.nc.gov>; Duke, Lawrence <lawrence.duke@oah.nc.gov>; Ruhlman, Carrie A <carrie.ruhlman@ncwildlife.org>
Subject: [External] 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

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May 13th, 2022

Sent by:

Stephen Vick
WRC# 1284584
717 Old Mill Road
Chapel Hill, NC 27514

Dear members of the Commission:

This letter is an objection to the approval of 15A NCAC 10D .0240. We request that the above rule be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. We further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

This rule is also not necessary for WRC to designate a camping area on Jordan Gameland; WRC Deputy Dir of Operations communicated to us that WRC already has authority under existing rules [15A NCAC 10D .0102 (i)] to designate year-round camping areas on its property; he indicated that the new rule is intended simply to restrict the period during which camping will be permitted (i.e., hunting seasons only). A new rule designed primarily to offer restrictions can offer locational/safety as well as timing specifications for camping.

Thank you for your consideration.



Stephen Vick | Broker
Acorn + Oak Property Management
919.675.1444 x 23 (o)
919.589.2919 (m)
acorn-oak.com

Burgos, Alexander N

From: Rules, Oah
Sent: Thursday, May 12, 2022 2:49 PM
To: Burgos, Alexander N
Subject: FW: [External] 15A NCAC 10D .0240

From: Henry Rice, M.D. <henry.rice@duke.edu>
Sent: Thursday, May 12, 2022 2:39 PM
To: Rules, Oah <oah.rules@oah.nc.gov>
Subject: [External] 15A NCAC 10D .0240

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

Members of the Commission:

This letter is an objection to the approval of 15A NCAC 10D .0240. We request that the above rule be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. We further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Signed,

Henry Rice

Henry E. Rice, MD
Professor of Surgery, Pediatrics, and Global Health (Research)
Chief, Division of Pediatric General Surgery
Duke University Medical Center
Duke Global Health Institute

The information in this electronic mail is sensitive, protected information intended only for the addressee(s). Any other person, including anyone who believes he/she might have received it due to an addressing error, is requested to notify the sender immediately by return electronic mail, and to delete it without further reading or retention. The information is not to be forwarded to or shared unless in compliance with Duke Health policies on confidentiality and/or with the approval of the sender.

Burgos, Alexander N

From: Rules, Oah
Sent: Thursday, May 12, 2022 2:49 PM
To: Burgos, Alexander N
Subject: FW: [External] Re: 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

-----Original Message-----

From: Mary Dickerson <mcicker@bellsouth.net>
Sent: Thursday, May 12, 2022 2:39 PM
To: Rules, Oah <oah.rules@oah.nc.gov>; Duke, Lawrence <lawrence.duke@oah.nc.gov>; Ruhlman, Carrie A <carrie.ruhlman@ncwildlife.org>
Subject: [External] Re: 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

Members of the Commission:

This letter is an objection to the approval of 15A NCAC 10D .0240. We request that the above rule be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. We further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Signed,
Mary Dickerson
7123 Kepley Rd
Chapel Hill NC 27517
919-929-9329

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Burgos, Alexander N

From: Rules, Oah
Sent: Friday, May 13, 2022 7:56 AM
To: Burgos, Alexander N
Subject: FW: [External] 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

From: buchanan4121@gmail.com <buchanan4121@gmail.com>
Sent: Thursday, May 12, 2022 5:42 PM
To: Rules, Oah <oah.rules@oah.nc.gov>; Duke, Lawrence <lawrence.duke@oah.nc.gov>; Ruhlman, Carrie A <carrie.ruhlman@ncwildlife.org>
Subject: [External] 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

Members of the Commission:

This letter is an objection to the approval of 15A NCAC 10D .0240. We request that the above rule be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. We further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Philip Buchanan

919-602-4036

05/12/22

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Burgos, Alexander N

From: Rules, Oah
Sent: Friday, May 13, 2022 7:56 AM
To: Burgos, Alexander N
Subject: FW: [External] 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

From: Heather Lee <hlee@developmentalassociates.com>
Sent: Thursday, May 12, 2022 5:20 PM
To: Rules, Oah <oah.rules@oah.nc.gov>; Duke, Lawrence <lawrence.duke@oah.nc.gov>; Ruhlman, Carrie A <carrie.ruhlman@ncwildlife.org>
Subject: [External] 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Members of the Commission:

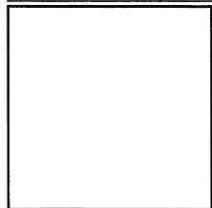
This letter is an objection to the approval of 15A NCAC 10D .0240. We request that the above rule be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. We further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you,

--

Heather Lee
8125 Kennebec Dr, Chapel Hill, NC 27517

Heather A. Lee, Ph.D., SPHR
Industrial/ Organizational Psychologist,
Partner, Co-Founder - Developmental Associates, LLC
Business Mailing Address: 510 Meadowmont Village Circle, #299
Chapel Hill, NC 27517
(919) 813-6096, Ext. 101
<http://www.linkedin.com/in/heatherleeph>
www.developmentalassociates.com



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Burgos, Alexander N

From: Rules, Oah
Sent: Tuesday, May 10, 2022 1:15 PM
To: Burgos, Alexander N; Duke, Lawrence
Subject: FW: [External] 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

From: w4ag@mindspring.com <w4ag@mindspring.com>
Sent: Tuesday, May 10, 2022 1:13 PM
To: Rules, Oah <oah.rules@oah.nc.gov>
Subject: [External] 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

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9 May 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

Members of the Commission:

This letter is an objection to the approval of 15A NCAC 10D .0240. We request that the above rule be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. We further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

This Wildlife Resources Commission rule is insufficiently specific regarding location of hunter camping areas in Jordan Gameland. Unlike some other NC gamelands, Jordan Gameland adjoins rapidly-suburbanizing zones, with high-traffic, mixed-use areas such as residential neighborhoods and parking lots that deserve safe distancing from hunter campgrounds. WRC hunter campgrounds elsewhere in the Piedmont concentrate human waste, trash, and deer carcasses, encourage illegal target shooting (from direct observation of Butner-Falls of Neuse Gameland), and increase woodland fire risk. These hygienic and safety concerns justify a distance specification for a Jordan rule. We would withdraw our objection if the text of the rule were amended to specify that campgrounds shall be located at least 350 yards from the nearest habitation, parking lot, or boat ramp.

This rule is also not necessary for WRC to designate a camping area on Jordan Gameland; WRC Deputy Dir of Operations communicated to us that WRC already has authority under existing rules [15A NCAC 10D .0102 (i)] to designate year-round camping areas on its property; he indicated that the new rule is intended simply to restrict the period during which camping will be permitted (i.e., hunting seasons only). A new rule designed primarily to offer restrictions can offer locational/safety as well as timing specifications for camping.

Thank you for your consideration.

Stan and Janet Dicks

residents of The Downs

7514 Kennebec Dr
Chapel Hill, NC 27517
919-968-7299

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Burgos, Alexander N

From: Rules, Oah
Sent: Tuesday, May 10, 2022 11:35 AM
To: Burgos, Alexander N; Duke, Lawrence
Subject: FW: [External] Re: 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

From: Rebecca Denson <rebeccadenson@gmail.com>
Sent: Tuesday, May 10, 2022 11:27 AM
To: Rules, Oah <oah.rules@oah.nc.gov>; Duke, Lawrence <lawrence.duke@oah.nc.gov>; Ruhlman, Carrie A <carrie.ruhlman@ncwildlife.org>
Subject: [External] Re: 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

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Rebecca Denson, MD

7814 Kennebec Drive

Chapel Hill, NC 27517

May 10, 2022

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration,

Rebecca Denson, MD

Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

Burgos, Alexander N

From: Rules, Oah
Sent: Monday, May 9, 2022 3:10 PM
To: Burgos, Alexander N
Subject: FW: [External] 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

From: Holt Farley <holtfarley@bellsouth.net>
Sent: Monday, May 9, 2022 1:13 PM
To: Rules, Oah <oah.rules@oah.nc.gov>; Duke, Lawrence <lawrence.duke@oah.nc.gov>; Ruhlman, Carrie A <carrie.ruhlman@ncwildlife.org>
Subject: [External] 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

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May 9, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: 15A NCAC 10D .0240 -- Jordan Gameland Camping: Objection and Request for Legislative Review

Members of the Commission:

This letter is an objection to the approval of 15A NCAC 10D .0240. We request that the above rule be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. We further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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Thanks very much for your consideration.

Regards,

Holt and Joy Farley

Residents of The Downs Neighborhood

7313 Kepley Road

Chapel Hill, NC 27517

919-260-8225

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April 30, 2022

Office of Administrative Hearings

Via email:

oah.rules@oah.nc.gov

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: Objection to, and Request for Legislative Review of, 15A NCAC 2B .0212, 0214, .0215, .0216, and .0218.

Members of the Commission:

This letter is an objection to the approval of 15A NCAC 02B .0212, .0214, .0215, .0216, and .0218, which contain a water quality standard for 1,4-dioxane. I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.



Edward Sanz
Chief Restructuring Officer

Burgos, Alexander N

From: Alexa Spiegel <anspiegel@gmail.com>
Sent: Sunday, April 24, 2022 10:11 PM
Subject: [External] Save North Carolina Bears

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is **not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People

travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Alexa Spiegel

Burgos, Alexander N

From: Andrew McGlashan <acmcglashan@gmail.com>
Sent: Saturday, April 16, 2022 1:41 AM
To: rrc.comments; Rules, Oah; McGhee, Dana; Duke, Lawrence
Subject: [External]

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is **not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People

travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

- Andrew Charles Mcglash

Burgos, Alexander N

From: Juliana Jordan <manymoonsmarketing@yahoo.com>
Sent: Thursday, April 14, 2022 11:44 AM
To: rrc.comments; Rules, Oah; McGhee, Dana
Cc: Duke, Lawrence
Subject: [External] PLEASE SAVE NC BEARS 🐻❤️

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Juliana Jordan-Huber

1028 Stonehouse Ridge Rd

Bardstown, KY 40004

April 14, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

It's so disappointing that North Carolina bears are under attack. My family and I enjoy visiting North Carolina and come to see the magnificent wildlife and beautiful natural landscape. Please protect the bears and their habitat.

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and is ambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.
3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Respectfully,

Juliana Jordan-Huber

Sent from my iPhone

Burgos, Alexander N

From: Valentina van Dijk <dakovkic@hotmail.com>
Sent: Thursday, April 14, 2022 8:27 AM
To: rrc.comments; Rules, Oah; McGhee, Dana; Duke, Lawrence
Subject: [External] REPEATED VERY URGENT REQUEST

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Van: Valentina van Dijk
Verzonden: dinsdag 12 april 2022 13:36
Aan: rrc.comments@oah.nc.gov <rrc.comments@oah.nc.gov>; oah.rules@oah.nc.gov <oah.rules@oah.nc.gov>; dana.mcghee@oah.nc.gov <dana.mcghee@oah.nc.gov>; lawrence.duke@oah.nc.gov <lawrence.duke@oah.nc.gov>
Onderwerp: VERY URGENT REQUEST

N.C. Rules Review Commission 1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Dear Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is **not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was

made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

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The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.
3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Johan van Dijk

Alexandra van Dijk

Valentina van Dijk

Kira van Dijk

Lina van Dijk

Burgos, Alexander N

From: gzia@mail.com
Sent: Wednesday, April 13, 2022 5:13 PM
To: Andrew Atkins; justicebarbarajackson@gmail.com; overton.ro@gmail.com; ppowell@apbev.com; bobbymonica@bellsouth.net; currinm@campbell.edu; Jeanette.k.doran@gmail.com; wboyles@aol.com; jeff.hyde@aestheticimages.net
Subject: Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons; 1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above); 1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy; 1. The Pisgah, Panthertown-Bonas Defeat and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

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 6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
 7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.
- For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Burgos, Alexander N

From: ruthieweller@gmail.com
Sent: Wednesday, April 13, 2022 1:29 PM
To: rrc.comments; Rules, Oah
Cc: McGhee, Dana; Duke, Lawrence
Subject: [External] [15A NCAC 10D .0106] Bear Sanctuaries

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Members of the Commission:

As an avid hiker and backpacker who has enjoyed the wonderful wilderness areas of North Carolina, I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision. I will take my vacation and tourism dollars elsewhere if the commission chooses to allow the bear hunt to go forward.

The rule will have a negative impact on the state's economy;

1. The Pisgah, Panthertown-Bonas Defeat and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Ruthie Weller

Sent from my iPhone

Burgos, Alexander N

From: Stephany Gustavson <sirenenebula@gmail.com>
Sent: Wednesday, April 13, 2022 11:35 AM
To: rrc.comments; Rules, Oah; McGhee, Dana; Duke, Lawrence
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Stephany C Gustavson

13511 87th PL
Seminole, FL 33776

4/13/23

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy;

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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Stephany C Gustavson
Stephany C Gustavson

Burgos, Alexander N

From: Deedee D <d2or3ny@gmail.com>
Sent: Wednesday, April 13, 2022 11:22 AM
To: Duke, Lawrence
Subject: [External] Request to speak April 21 on Rule [15A NCAC 10D .0106] Bear Sanctuaries

Follow Up Flag: Follow up
Flag Status: Flagged

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Good morning, Attorney Duke ~

I am writing to request to speak regarding Rule 15A NCAC 10D .0106 Bear Sanctuaries on April 21, 9am, at the Rules Review Commission meeting, as set out in N.C.G.S. 150B-21.3.

Please note that I am against the rule.

Please confirm that I will be able to speak and how to participate in the meeting.

Thank you,
Deedee Dillingham
Mills River, NC

Burgos, Alexander N

From: Nick Grashof <Nick-Grashof@gmx.de>
Sent: Wednesday, April 13, 2022 7:55 AM
To: Duke, Lawrence; rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Bear hunting

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[Name]
[Address]

[Date]

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.
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1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Nick Grashof

[Signature]

Burgos, Alexander N

From: Valentina van Dijk <dakovkic@hotmail.com>
Sent: Tuesday, April 12, 2022 9:36 AM
To: rrc.comments; Rules, Oah; McGhee, Dana; Duke, Lawrence
Subject: [External] VERY URGENT REQUEST

Importance: High

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N.C. Rules Review Commission 1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Dear Members of the Commission:

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6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Johan van Dijk

Alexandra van Dijk

Valentina van Dijk

Kira van Dijk

Lina van Dijk

Andrea Collins
253 Church Street
Whitmire, SC 29178

April 11, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

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4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule. The rule will have a negative impact on the state's economy;
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Thank you for your consideration.

Andrea Collins

Burgos, Alexander N

From: Jessica Pate <jlpate79@gmail.com>
Sent: Monday, April 11, 2022 8:39 AM
To: rrc.comments; Rules, Oah; McGhee, Dana; Duke, Lawrence
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries
Attachments: 15A NCAC 10D .0106 Bear Sanctuaries.pdf

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Jessica Pate
465 Taylor Ave. Akron, OH 44312

11/APR/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Jessica Pate

P.S. Please see the attached signed copy of this submission.

To

Office of Administrative Hearings
1711 New Hope Church Rd.
Raleigh, NC 27609.

And

Dana McGhee

The Agency's Rulemaking Coordinator

From:

Margaret Samuel

20 Bay Street, Suite 1100

Toronto, Ontario

M5J 2N8

April 11, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Margaret Samuel

A handwritten signature in cursive script that reads "Margaret Samuel".

Burgos, Alexander N

From: msamuel msamuel <msamuel@sympatico.ca>
Sent: Monday, April 11, 2022 12:37 AM
To: rrc.comments; Rules, Oah; McGhee, Dana; Duke, Lawrence
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Margaret Samuel

20 Bay Street, Suite 1100

Toronto, Ontario

M5J 2N8

[Date]

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Thank you for your consideration.

[Name]

[Signature]

Burgos, Alexander N

From: Jörg Gaiser <JoergGaiser@gmx.net>
Sent: Sunday, April 10, 2022 11:48 AM
To: Duke, Lawrence; rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Bear Sanctuaries

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Dear Ladies and Gentlemen,

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Thank you for your consideration.

Sincerely,

Jörg Gaiser
Baiersbronn
Germany

Burgos, Alexander N

From: Christine Swoap <clswoap@gmail.com>
Sent: Sunday, April 10, 2022 9:19 AM
To: Duke, Lawrence
Subject: [External] Fwd: Maintain bear sanctuary

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Christine LaRocque Swoap
27 Wilhide Road
Asheville, NC 28805

April 10, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Christine LaRocque Swoap

Christine LaRocque Swoap

Burgos, Alexander N

From: LIN BOND <suetlingale@yahoo.co.uk>
Sent: Saturday, April 9, 2022 9:38 AM
To: Duke, Lawrence
Cc: McGhee, Dana; rrc.comments; Rules, Oah
Subject: [External] Save North Carolina Bears

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Dear Members of the Commission

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.
4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.
3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Yours faithfully

Lin Bond

Burgos, Alexander N

From: Valentina van Dijk <dakovkic@hotmail.com>
Sent: Saturday, April 9, 2022 9:06 AM
To: Duke, Lawrence; Rules, Oah; McGhee, Dana; rrc.comments
Subject: [External] URGENT REQUES!!

Importance: High

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3.

I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

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Thank you for your consideration.

Valentina van Dijk

Burgos, Alexander N

From: michaelwauschek <michaelwauschek@yahoo.com>
Sent: Friday, April 8, 2022 7:16 PM
To: Duke, Lawrence
Subject: [External] FW: Protection of bears aka life

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Sent from my Metro By T-Mobile 4G LTE Android Device

----- Original message -----

From: michaelwauschek <michaelwauschek@yahoo.com>
Date: 4/8/22 4:13 PM (GMT-08:00)
To: dana.mcgee@oah.nc.gov
Subject: Protection of bears aka life

Hello my name is Michael Wauschek
4/8/22

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

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5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules

Sent from my Metro By T-Mobile 4G LTE Android Device

Burgos, Alexander N

From: Bennett Morgan <bennettscottmorgan@gmail.com>
Sent: Friday, April 8, 2022 6:19 PM
To: Duke, Lawrence; rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Members of the Commission:

[15A NCAC 10D .0106] Bear Sanctuaries

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Bennett Morgan
Lake Toxaway, North Carolina

March 9, 2022

FILED

Office of Administrative Hearing
1711 New Hope Church Rd.
Raleigh, NC 27609

MAR 11 2022

OFFICE OF ADMIN HEARINGS

To Whom It Should Concern:

I am requesting a legislative review of Bear Hunting on all National Forests in North Carolina – ESPECIALLY bear SACTUARIES.

- 2,744 comments were sent in regarding this issue and 86% were against Bear Hunting. The Commissions are not listening to the majority of the people. We the people own this land.
- There has to be educating of the public as to how to store food properly when camping out, etc. (Bear Wise has done all the work and all this information is available)
- Bears will leave the area if there is not enough food supply and will reduce the number of offspring when this occurs. Therefore regulating themselves.
- Someone is going to get shot\killed having hikers walking around not knowing it is bear season. I pray it's no one in your family.

All dogs are supposed to be on a leash. Why are you making exceptions for hungry hunting dogs to roam freely to scare and attack people with leashed dogs

- These forest were labeled Bear Sanctuaries because Others (before the current Commissions) knew they needed a place to live where we chose to build our towns, roads, houses.

I don't understand hunters wanting to kill for a trophy. They don't even eat this meat. Bears are an icon for North Carolina; can we please stop killing the animals for sport.

Most Sincerely



Diane Levine
P.O. Box 990
Highlands, NC
828-526-8579
diane.t.levine@gmail.com

Re: 15A NCAC 10D.0106 Bear Sanctuaries

To the Members of the Commission,

I request that the above rule be reviewed in the upcoming legislative session as set out in NC
G.S. 150B-21.3

I further request that the rule be subject to a delayed effective date as set out in that same
provision.

Thank you for listening and for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Anne Edwards". The signature is written in a cursive style with a long, sweeping flourish at the end.

Anne Edwards

NEW YORK, 4/9/22

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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4.4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Sincerely,
Marina Tiedemann
Email: alassio91@aol.com

**"To my mind, the life of a lamb is no less precious than that of a human being...I hold that, the more helpless a creature, the more entitled it is to protection by man from the cruelty of man."
(Mahatma Gandhi)**

MARINA TIEDEMANN
PO BOX 1147
VALLEY STREAM, NY 11572

McGhee, Dana

From: Conny <connydehn@gmx.de>
Sent: Saturday, April 9, 2022 8:51 AM
To: Rules, Oah
Subject: [External] Sanctuaries are for PROTECTION !!!!
Importance: High

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

From: Conny [mailto:connydehn@gmx.de]
Sent: Samstag, 9. April 2022 14:50
To: 'rrc.comments@oah.nc.gov'
Subject: Sanctuaries are for PROTECTION !!!!
Importance: High

09/04/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Bear Sanctuaries

Members of the Commission:

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4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.
3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106]
Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Conny Dehn



Virenfrei. www.avast.com

McGhee, Dana

From: Raul Ratasepp <rx81@hotmail.com>
Sent: Saturday, April 9, 2022 6:18 AM
To: Rules, Oah
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Raul

Laura Livingston
203 Toxaway Court
Lake Toxaway, NC 28747

March 13, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Laura G Livingston

A handwritten signature in blue ink that reads "Laura G Livingston". The signature is written in a cursive style and is positioned below the typed name.

Wilbur D. Livingston, Jr, MD
203 Toxaway Court
Lake Toxaway, NC 28747

March 13, 2022

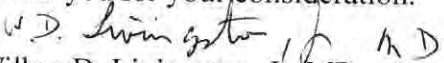
N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.


Wilbur D. Livingston, Jr, MD

McGhee, Dana

From: Margo Purdy <mpkvnc@gmail.com>
Sent: Wednesday, March 16, 2022 3:42 PM
To: Rules, Oah
Subject: [External] Bear Sanctuary issue [15A NCAC 10D .0106]

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N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The NCWRC makes a mockery of the public comment period with its refusal to change any portion of their proposal. The opposition is enormous. Anyone can see that one size does not fit all, and their plans for bear hunts in Panthertown Valley are particularly egregious given the relative small size of this hunting area and the broad recreational use it has beyond hunting (yes, other hunting is permitted there already, no need to add more).

Sincerely,

Margo Purdy
228 Packs Rd.
Glenville, NC 28736
828-743-2809

McGhee, Dana

From: Jennifer Stanton <jennifer@retailadvisoryservices.com>
Sent: Wednesday, March 16, 2022 6:46 PM
To: Rules, Oah
Subject: [External] Request for Review of Rule Change by NC Wildlife Resources Bear Sanctuary to Bear Management for the purpose of hunting
Attachments: Rules Review Commission Request for Review NC Wildlife Resources Bear Sanctuary Change to Hunting Grounds 31522.docx; Rules Review Commission NC Wildlife Resources Commission Bear Sanctuary to Bear Management 31622.pdf

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.

Jennifer M Stanton
92 Indian Bend Dr.
Hendersonville, NC 28739

3/15/22

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: N.C. Wildlife Requested Change to 22 Bear Sanctuaries to Bear Management Areas for the purpose of allowing hunting at first in three of them: Panthertown-Bonas Defeat, Standing Indian and Pisgah.

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

This is a terrible idea that will further endanger summer camp children, hikers and nearby residents. Evidence of the increasing volume of visitors in these areas, and of emboldened and irresponsible gun owner incidents has been presented, and apparently ignored. Hunters are a lot more dangerous than the bears. Tourism is the backbone of the economy, bears sightings are a significant draw to visitors. Please don't do this to us.

Thank you for your consideration.

Jennifer M Stanton



Jennifer M Stanton
Retail Advisory Services
jennifer@retailadvisoryservices.com
704 907-0579 cell

JENNIFER STANTON



McGhee, Dana

From: Helen Moore <hmpanther@me.com>
Sent: Thursday, March 17, 2022 8:02 AM
To: Rules, Oah
Subject: [External] Bear Task Force
Attachments: BEAR letter Requesting-Legislative-Review.docx

McGhee, Dana

From: Helen Moore <hmpanther@me.com>
Sent: Thursday, March 17, 2022 7:56 AM
To: Rules, Oah
Subject: [External] hmpanther@me.com

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Helen Moore
140 Kenridge Lane
28741

March 16th, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609
Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.Helen Moore

[Signature] Helen Moore

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Bear Education and Resources Task Force (B.E.A.R.)
PO Box 1238
Highlands, NC 28741

March 14, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The vast majority (over 86%) of commenters on this subject were opposed to the proposal to open bear sanctuaries to hunting, comments that were largely ignored by the Commission. Also ignored was the fact that there were no reports of human-bear conflicts in Panthertown Valley in 2021. The Commission also appeared to ignore the fact that the Friends of Panthertown have instituted educational outreach efforts for people who recreate in the valley. In addition, the installation of two bear-proof storage lockers have proven extremely effective at reducing bear problems at campsites. Our organization recently provided \$3000 to fund the addition of three more lockers at campsites.

We feel that these efforts combined with the great reduction in human-bear conflicts in the valley negate the need to reduce the bear population by killing them. We also believe that bear hunting is a dangerous conflict in an area that sees thousands of people using the area for hiking, fishing, rock climbing, photography, camping, etc. on a year-round basis.

Therefore, we respectfully request the above rules be reviewed.

Thank you for your consideration.

Cynthia Strain, Chairwoman

McGhee, Dana

From: michaelwauschek <michaelwauschek@yahoo.com>
Sent: Friday, April 8, 2022 7:15 PM
To: Rules, Oah
Subject: [External] FW: Protection of bears aka life

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Sent from my Metro By T-Mobile 4G LTE Android Device

----- Original message -----

From: michaelwauschek <michaelwauschek@yahoo.com>
Date: 4/8/22 4:13 PM (GMT-08:00)
To: dana.mcghee@oah.nc.gov
Subject: Protection of bears aka life

Hello my name is Michael Wauschek
4/8/22

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention

that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy;

1. The Pisgah, Panthertown-Bonas Defeat and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules

Sent from my Metro By T-Mobile 4G LTE Android Device

McGhee, Dana

From: Mary Shabbott <mshabbott@sbcglobal.net>
Sent: Friday, April 8, 2022 5:38 PM
To: Rules, Oah
Subject: [External] Bear Sanctuaries

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Mary Shabbott
10249 Acorn Trail Punta Gorda Florida 33950

04-08-2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and

there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

I have visited North Carolina many times. I will not be back to spend money unless these bears are protected in designated sanctuaries where NO hunting is allowed.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you,
Mary Shabbott

Burgos, Alexander N

From: Chris Cain <doskil@gmail.com>
Sent: Sunday, March 27, 2022 7:37 PM
To: rrc.comments
Cc: Ruhlman, Carrie A
Subject: [External] 15A NCAC 10B.0203-Deer (White-Tailed)

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Christopher R. Cain
196 Smith Knolls Road
Fairview, NC 28730-9546

March 27, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: 15A NCAC 10B.0203

Members of the Commission:

I request that the above rule be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Christopher R. Cain

Burgos, Alexander N

From: betty winholtz <winholtz@sbcglobal.net>
Sent: Saturday, April 9, 2022 1:17 AM
To: McGhee, Dana; Rules, Oah; rrc.comments
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Dear Commissioners:

I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons:

1. There is no scientific evidence to support claims that hunting reduces bear-human conflicts. The problem with bear-human conflicts has been resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. At the April 5, 2022 meeting, State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters.
4. The NCWRC has not clearly defined the details of the rule.

Sincerely,
Betty Winholtz

Burgos, Alexander N

From: lrcaain@juno.com
Sent: Wednesday, March 30, 2022 11:03 AM
To: rrc.comments
Cc: Ruhlman, Carrie A
Subject: [External] 15A NCAC 10B.0203-Deer (White-Tailed)

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Larry R. Cain
196 Smith Knolls Road
Fairview, NC 28730

March 30, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: 15A NCAC 10B.0203

Members of the Commission:

I request that the above rule be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Respectfully,

Larry R. Cain

Burgos, Alexander N

From: Liliana Berndsen <lilianaberndsen@yahoo.com>
Sent: Saturday, April 9, 2022 3:24 AM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] STOP KILLING BEARS IN NORTH CAROLINA

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration!

Sincerely,

Liliana Berndsen

Burgos, Alexander N

From: Sharon Franco <shar5334@gmail.com>
Sent: Sunday, April 10, 2022 7:53 PM
To: rrc.comments
Subject: [External] Update on petition — Stop Rule That Allows N.C. Bears Living In Bear Sanctuaries To Be Killed By Trophy Hunters

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Hi,

I wanted to share an exciting update about a petition I signed on [Change.org](#): "Stop Rule That Allows N.C. Bears Living In Bear Sanctuaries To Be Killed By Trophy Hunters".

Read about the update "URGENT: Take Action Now To Save North Carolina Bears - New Calls To Action" below, and join me in supporting this campaign by signing the petition!

<https://chng.it/4qpWgh2YCJ>

Thanks!
sharon

Sharon Franco RD LD
Registered Dietitian

[Name] RICH KELLY
[Address] 28 KING MOUNTAIN TRL
[Date] HIGHLANDS, NC 28741

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

[Name] RICH KELLY
[Signature] 

Sue Wachtel
3804 Agualinda Blvd.
#103
Cape Coral, FL 33914

New Rules Review Commission
1711 New Hope Church Road
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonus Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U. s. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the USFS has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process

called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the MacSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges to have been pressuring them to open the three bear sanctuaries to hunting.
4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof lockers have been installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years and more food lockers being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86 per cent of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourists and outdoor recreation industries are significant contributors to North Carolina's economy .
3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs when camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets and private property owners. Tourists and residents will think twice before bringing their family to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved the Rules Review Commission.

Thank you for your consideration.

Sue Wachtel

Sue Wachtel



Friends of Panthertown, inc.

P.O. Box 51 • Cashiers, NC 28717 • 828-269-HIKE (4453) • www.panthertown.org • friends@panthertown.org

Friends of Panthertown, Inc.
PO Box 51
Cashiers, NC 28717

April 14, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

We request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. We further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Jason Kimenker
Executive Director
Friends of Panthertown, Inc.

Dear members of the Commission:

I request that the above rules be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rules be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allow bear hunting with dogs in the Pisgah, Panthertown - Bonas Defect, and standing Indian Bear Sanctuaries along with a change in the term "designated bear management area" is not clear and unambiguous for the following reasons:

1. The NCWRC's basis for the rule was that U.S. Forest Service (USFS) requested that they open the sanctuaries to hunting, due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proved. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own population through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity. Further, Jacob Humm and Joseph Clark from the University of Tennessee recently published their spatially explicit mark-recapture study of female black bears in the Southern Appalachian highlands of GA, TN, SC and NC. They determined that 2983 females bears existed in WNC including those protected inside of Great Smoky Mountains National Park. Using UT's population estimate, NCWRC mortality data, and an assumption that half the ~~pop~~ population is female, 23% of bears in WNC are being harvested every year. Prominent researcher (Bunnell and Tait) have set 23% as the maximum mortality rate, so NC's bear population is already at its limit without opening up more protected area to bear hunters.

The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholder on April 5, 2022 at Tri-County Community College in Murphy to discuss the recently adopted rule. The entire room was full of hunters and a few non-hunters. State Representative Karl Gillespie and Senator Corbin sponsored the meeting. Rep Gillespie asked everyone in favor of the rule to raise their hands.

Not a single person raised their hands, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting. At the end of the meeting, Rep. Gillespie was in attendance. He asked everyone in favor. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

For all of the reasons listed above, I request that 15A NCAC 10D.0106] Bear Sanctuaries not be approved by the rules review commission.

Thank you for your consideration.

Ji Montgomery
Ji Montgomery

2 North Stoner Ave
Shiremanstown PA

April 10, 2022

Linda Schroeder
384 Glen Rd
Sparta, N.J. 07871

April 8, 2022.

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, N.C. 27609

Re: (15A NCAC 10D .0106)
Bear Sanctuaries

Dear Commission Members,

I request that the above be reviewed in the next legislative session as set out in

N.C.G.S. 150B-21.3. IN

addition, I request that the rules be subject to a delayed effective date as determined in that same provision.

The N.C. Wildlife Resources Commission recently adopted a rule that allows unnecessary

bear hunting (AND hunting with dogs!!!) in the Pisgah, Panther town - Bonas Defeat, and Standing Indian Bear Sanctuaries.

The term "designated bear sanctuaries" was changed to "designated bear management areas".

I come to our PARKS to see wildlife. If this is passed - what am I going to see? Dead or injured bears?

Guess where I will NOT go in the fall if this is upheld?

Thank you for your attention.

LINDA A Schroeder

Linda A Schroeder

Mary Radike Smith
86 Riddle Road
Cincinnati OH 45215
April 8, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609
Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that ~~the bear population is growing and needs to be managed~~. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.
4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years,

and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Mary Radike Smith



[Name] *DEBBIE BRYSON*
[Address] *P.O. BOX 1232*
CASHTERS, NC 28717
[Date] *3-18-22*

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

[Name] *DEBBIE BRYSON*

[Signature] *Debbie Bryson*

[Name] WILLIAM WEIR
[Address] 128 RUNNING FOX Rd
SAPPHIRE, NC 28774
[Date] 3-18-22

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

[Name] WILLIAM WEIR
[Signature] William Weir

[Name] Julie Yao
[Address] 126 Azalea Court
Sapphire, NC 28774
[Date] March 18, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

[Name] Julie Yao

[Signature] Julie Yao

McGhee, Dana

From: STEVE SILVERMAN <drstevensilverman@gmail.com>
Sent: Sunday, March 20, 2022 10:27 AM
To: Rules, Oah
Subject: [External]

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Dr. Steven Silverman
1052 Toxaway Drive
Lake Toxaway ,NC 28747

3/20/21

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Dr. Steven Silverman

McGhee, Dana

From: William Barclift <will.barclift@icloud.com>
Sent: Sunday, March 20, 2022 10:59 AM
To: Rules, Oah
Subject: [External] Request Re: [15A NCAC 10D .0106] Bear Sanctuaries
Attachments: Request-for-Legislative-Review-Will-Barclift-20220320.pdf

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March 20, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

My request is also attached as a signed pdf copy of my letter.

Thank you for your consideration.

Will Barclift

Will Barclift
441 Glenridge Rd.
Glenville, NC 28782

March 20, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Will Barclift

A handwritten signature in black ink, appearing to read "Will Barclift", written in a cursive style.

Richard Weldon
21 Whispering Falls CT
Tuckasegee, NC 28783

March 15, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard Weldon", with a stylized flourish at the end.

Richard Weldon

Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:39 PM
To: Burgos, Alexander N
Subject: FW: [External] 15A NCAC 10D. 0106 Bear scandary

From: Ji Montgomery <jiprk99@gmail.com>
Sent: Friday, April 8, 2022 10:51 PM
To: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] 15A NCAC 10D. 0106 Bear scandary

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Dear member of commission

I requested that the above rules be reviewed in upcoming legislative session as set out in N.C.G.S 150 B -21 .3 I further request that the rules be subject to a delayed effective date as set out in that some provision. The North Carolina wildlife resources commission's recently adopted rule that allows bear hunting and hunting wild dogs in the pisgah, pantertown- Bonas defeated, and standing Indian bear scandary along with a change in term. " Designated bear management area" is not clear and unambiguous for the following reasons;

The NCWRC'S basis for the rule was that the US FOREST SERICE (USFS) requested that they open up the scandaries to hunting due to increased bear- human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear- human conflict. The opposite has been proven. The NCWRC also failed to mention in 2018, and the request was solely for panthertown. Additionally, the problem with bear human conflicts has been subsequently resolved by introducing bear- proof food lockers in 2020. Over the past two years, the US, forest service(USFS) has not received any complaints regarding bear- human conflicts,and there are plans to install more food lockers as proactive measure in preventing future bear- human conflict. For all the reason listed above, request that 15A NCAC 10D.0106 BEAR SCANDARIES NOT be approved by the rules review commission.

Ji Montgomery
2 North stoner ave
Shiremanstown pa 17011
April 8 2022

Thank you for your consideration
Ji Montgomery

Email correspondence to and from this address may be subject to the North Carolina Public Record's Law and may be disclosed to third parties by an authorized state official.

Jo Rizer
917 Berkeley Ave
Charlotte, NC. 28203

March 15, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: 15A NCAC 10D .0106 Bear Sanctuaries

As it relates to our property at Bear Lake Reserve, 139 Allspice Ct, Tuckasegee, NC. 28783

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The rules were promulgated despite significant opposition from Bear Lake Reserve and other adjacent property owners, as well as Friends of Panthertown Valley. Additionally, the rules were promulgated based upon an outdated study/survey of the bear population in Panthertown, and without consideration of recent efforts to curb the population which have been successful.

Therefore, it seems appropriate that the commission delay the effective date in order to review these rules and the process that was used to pass those rules. Thank you for your consideration.


Jo Rizer

Burgos, Alexander N

From: Rules, Oah
Sent: Monday, April 18, 2022 2:01 PM
To: Burgos, Alexander N
Subject: FW: [External] [15A NCAC 10D .0106] Bear Sanctuaries
Attachments: BearLettert.pdf

From: Ted Scalzo <tscalzo@mac.com>
Sent: Wednesday, April 13, 2022 8:06 PM
To: Rules, Oah <oah.rules@oah.nc.gov>
Subject: [External] [15A NCAC 10D .0106] Bear Sanctuaries

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Theodore R. Scalzo 216 Fox Hill Spring Branch, TX 78070 April 13, 2022
N.C. Rules Review Commission 1711 New Hope Church Rd. Raleigh, NC 27609 Re: [15A NCAC 10D .0106]

Bear Sanctuaries Members of the Commission: I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision. The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is **not clear and unambiguous for the following reasons**; 1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts. 2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity. 3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting. 4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined. **The rule is not reasonably necessary because of the following (also see above)**; 1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts. 2. Hunting does not reduce bear-human conflicts. 3. Bears manage their own populations through delayed implantation. 4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule. **The rule will have a negative impact on the state's economy (economic impact)**; 1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears. 2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy. 3. The bear hunting season is a popular time for tourism (leaf season). 4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping. 5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas. 6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail. 7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year. **For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.**

Thank you for your consideration. Theodore R. Scalzo

April 11, 2022

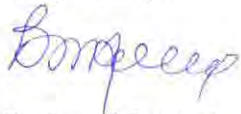
Members of the Commission,

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I would not feel comfortable exposing myself, family and pet dogs to potentially being shot or attacked by hunting dogs while camping or trail walking within the forest.
If this new rule is not reversed, I will reconsider living or even visiting NC again.

Respectfully,



Barbara Marquet
87 Fairway Loop
Burnsville, NC 28714

Please see enclosed letter below.

Objection to NCWRC Bear Rule

From: Barbara Marquet (barbieatwags@yahoo.com)

To: sophies_pyramid@yahoo.com

Date: Monday, April 11, 2022, 12:50 PM EDT

Barbara Marquet
87 Fairway Loop
Burnsville, NC

April 11th, 2022

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
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The rule is not reasonably necessary because of the following (also see above);

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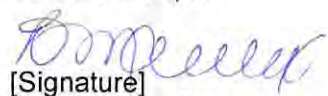
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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Barbara Marquet



[Signature]

Sent from my iPhone

April 11, 2022

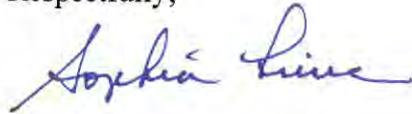
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Respectfully,



Sophia Lima
87 Fairway Loop
Burnsville, NC 28714

Please see enclosed letter below.

Sophia Lima
87 Fairway Loop
Burnsville, NC

April 11th, 2022

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.
4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

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Thank you for your consideration.

Sophia Lima



[Signature]

Madelyn C Stocker
700 Spencer LN
Lake Toxaway, NC 28747

April 9, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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Madelyn C Stocker

 4/9/22

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Panthertown is full of out of out of state people every October and November. Bear hunting will destroy the Panthertown reputation as a family oriented forest to visit (for hiking, camping, horse riding cycling, etc) while other areas have active hunting seasons. It is a refuge for the bears as well as the outdoors people who do not want to interact with the hunting public.

Richard J Stocker
700 Spencer LN
Lake Toxaway, NC 28747

April 9, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

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McGhee, Dana

From: michael bowler <michael.bowler@yahoo.ie>
Sent: Monday, April 11, 2022 10:26 AM
To: McGhee, Dana
Subject: [External] Bear Sanctuaries

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Michael Bowler
Rathcabban,
Roscrea,
Co. Tipperary,
Ireland

4-11-22

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Thank you for your consideration.

Michael Bowler

Michael Bowler

Burgos, Alexander N

From: Andrea Collins <andrealea@3mpodcast.com>
Sent: Monday, April 11, 2022 9:38 AM
To: rrc.comments; Rules, Oah; McGhee, Dana
Cc: Duke, Lawrence
Subject: [External] [15A NCAC 10D .0106] Bear Sanctuaries
Attachments: Bears.pdf

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Andrea Collins
253 Church Street
Whitmire, SC 29178

April 11, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

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4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule. The rule will have a negative impact on the state's economy;
 1. The Pisgah, Panthertown-Bonas Defeat and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
 2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.
 3. The bear hunting season is a popular time for tourism (leaf season).
 4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
 5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
 6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
 7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Andrea Collins

Burgos, Alexander N

From: John Beudet <bodaciousat@gmail.com>
Sent: Monday, April 11, 2022 9:22 AM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Bear Sanctuaries (15A NCAC 10D .0106)
Attachments: Rule change commission letter.docx

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

John Beudet

115 Scenic View Road

Flag Pond, TN 37657

April 10, 2022

N.C. Rules Review Commission

1711 New Hope Church Road

Raleigh, NC 27609

Re: 15A NCAC 10D .0106 Bear Sanctuaries

To the members of the Rules Review Commission;

I request that the above rule, adopted recently by the North Carolina Wildlife Resources Commission(NCWRC) be subject to a delay in effective date and a review in the upcoming legislative session.

This rule change that would allow bear hunting, with hunting dogs, in three long established bear sanctuaries as well as change the designation of these bear sanctuaries to “bear management areas” is unclear in it’s stated purpose and ambiguous in its actions and supposed results. The proposed rule is also unreasonable and unnecessary for the following reasons.

The NCWRC’s rule change states that the U.S. Forest Service requested the change for Panthertown sanctuary only, but gives no reason for the other two sanctuaries to be considered. The single request was made several years ago and actions have been taken since then (bear-proof food storage boxes installed) to remedy any problems with the result of zero problems reported since.

The rule change refers to a need to reduce the number of bears and “manage” the population when biologists know the American black bear is an animal that self regulates its population by altering its reproductive rate and does not need human intervention to remain at or below carrying capacity.

In addition, the biologists with NCWRC stated a need to kill more bears during hunting season as a means to lessen human-bear conflicts when studies have shown, and simple statistics verify, that increased harvest will not have any notable effect on such problems. Simply put, the problem the rule change addresses is not a problem at all and the solution adopted is quite flawed.

The rule change is also opposed by the vast majority of the public. A public meeting was held and most speakers opposed the rule change and subsequent comments received showed 86% opposed to the change. No proposal that can't even get 15% of the public's approval should be adopted anyway.

This rule change would also be bad for North Carolinas reputation as an outdoor wonderland and cause a decrease in tourism to these spectacular areas. The bear sanctuaries are a haven for nature enthusiasts who wish to escape the chaos of hunting and hunting dogs and changing the rules to allow this activity will cause them to look for other places to spend their time, and money.

This is a rule change whose stated goals will not be achieved by the proposed actions, whose logic is counter to scientific studies on the subject, whose implementation will hurt local economies, and is not supported by the public. Therefore, I ask that it be delayed and reviewed by the legislature.

Thank you for considering my comments,

John Beaudet

John Beaudet
East Tennessee Trail Association
Rocky Fork Journal
Rocky Fork Watershed Almanac

423.483.0306
Bodacious AT



John Beaudet
115 Scenic View Road
Flag Pond, TN 37657

April 10, 2022

N.C. Rules Review Commission
1711 New Hope Church Road
Raleigh, NC 27609

Re: 15A NCAC 10D .0106 Bear Sanctuaries

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Thank you for considering my comments,

John Beaudet

Burgos, Alexander N

From: Jessica Pate <jlpate79@gmail.com>
Sent: Monday, April 11, 2022 8:39 AM
To: rrc.comments; Rules, Oah; McGhee, Dana; Duke, Lawrence
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries
Attachments: 15A NCAC 10D .0106 Bear Sanctuaries.pdf

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Jessica Pate
465 Taylor Ave. Akron, OH 44312

11/APR/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is **not clear and unambiguous for the following reasons;**

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Jessica Pate

P.S. Please see the attached signed copy of this submission.

Burgos, Alexander N

From: Becky Wood <becksnpete@gmail.com>
Sent: Monday, April 11, 2022 8:35 AM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Bears

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.

As a potential overseas tourist I will not be coming to North Carolina until the policy of either trophy hunting and hunting with dogs of bears is dropped in sanctuaries.

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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Regards,

Becky Wood

McGhee, Dana

From: alassio91@aol.com
Sent: Saturday, April 9, 2022 12:24 PM
To: Rules, Oah
Subject: [External] Fwd: [15A NCAC 10D .0106] Bear Sanctuaries

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

From: alassio91@aol.com
To: rrc.comments@oah.nc.gov
Sent: 4/9/2022 12:22:34 PM Eastern Standard Time
Subject: Re: [15A NCAC 10D .0106] Bear Sanctuaries

NEW YORK, 4/9/22

MARINA TIEDEMANN
PO BOX 1147
VALLEY STREAM NY 11582

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

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4. 4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Sincerely,
Marina Tiedemann
Email: alassio91@aol.com

"To my mind, the life of a lamb is no less precious than that of a human being...I hold that, the more helpless a creature, the more entitled it is to protection by man from the cruelty of man." (Mahatma Ghandi)

McGhee, Dana

From: Bill Skinner <billskinner77@gmail.com>
Sent: Sunday, April 10, 2022 4:59 PM
To: Rules, Oah
Subject: [External] Fwd: URGENT: BEAR SANCTUARIES

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Sent from my iPhone

Begin forwarded message:

From: Nita Hunt <nitah63@gmail.com>
Date: April 10, 2022 at 4:37:26 PM EDT
To: Bill Skinner <billskinner77@gmail.com>
Subject: URGENT: BEAR SANCTUARIES

William Skinner
PO Box 422
2701 Golden Road
Lake Toxaway, NC 28747

4/10/22

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

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3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

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Thank you for your consideration.

William Skinner

McGhee, Dana

From: mandy mcavoy <mandymcavoy1@hotmail.co.uk>
Sent: Monday, April 11, 2022 5:27 AM
To: Rules, Oah
Subject: [External] NC rules

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.

Mandy McAvoy

18 Hornbeam Crescent
8QA
Kingdom

Harrogate
Yorkshire.

United Kingdom HG2

11th April 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

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4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Mandy McAvoy

Sent from my iPhone

McGhee, Dana

From: mitzi frank <frankmitzi@gmail.com>
Sent: Friday, April 8, 2022 4:51 PM
To: Rules, Oah; McGhee, Dana
Subject: [External] Bear hunting

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Mitzi Frank

6211 Beach Rd. Box 118

Sharon Center, Ohio 44274

4/8/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has

been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Mitzi Frank

McGhee, Dana

From: Denise et Jacques <inkelstamour@videotron.ca>
Sent: Friday, April 8, 2022 5:10 PM
To: Rules, Oah
Cc: McGhee, Dana
Subject: [External] Bear killing

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Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term **"designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. **It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven.** The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, **the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020.** Over the past two years, the **U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts**, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. **Bears regulate their own populations through a process called delayed implantation.** This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. **He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.**

4. The NCWRC has not clearly defined the details of the rule. **There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.**

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.
3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. **Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.**
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, **I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.**

Thank you for your consideration.

Denise Inkel
Montreal Canada

McGhee, Dana

From: Mary Shabbott <mshabbott@sbcglobal.net>
Sent: Friday, April 8, 2022 5:39 PM
To: McGhee, Dana
Subject: [External] Bear Sanctuaries

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Mary Shabbott
10249 Acorn Trail Punta Gorda Florida 33950

04-08-2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and

there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

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3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

I have visited North Carolina many times. I will not be back to spend money unless these bears are protected in designated sanctuaries where NO hunting is allowed.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you,
Mary Shabbott

McGhee, Dana

From: michaelwauschek <michaelwauschek@yahoo.com>
Sent: Friday, April 8, 2022 7:14 PM
To: McGhee, Dana
Subject: [External] Protection of bears aka life

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Hello my name is Michael Wauschek
4/8/22

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the

rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy;

1. The Pisgah, Panthertown-Bonas Defeat and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules

Sent from my Metro By T-Mobile 4G LTE Android Device

McGhee, Dana

From: Claire Flewitt <claireflewitt@hotmail.com>
Sent: Friday, April 8, 2022 9:07 PM
To: Rules, Oah; McGhee, Dana
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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N.C. Rules Review Commission

1711 New Hope Church Rd.
Raleigh, NC 27609

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
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single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

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2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

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4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.
Claire E. Flewitt

McGhee, Dana

From: Ji Montgomery <jiprk99@gmail.com>
Sent: Friday, April 8, 2022 10:51 PM
To: McGhee, Dana
Subject: [External] 15A NCAC 10D. 0106 Bear scandary

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Dear member of commission

I requested that the above rules be reviewed in upcoming legislative session as set out in N.C.G.S 150 B -21 .3 I further request that the rules be subject to a delayed effective date as set out in that some provision. The North Carolina wildlife resources commission's recently adopted rule that allows bear hunting and hunting wild dogs in the pisgah, pantertown- Bonas defeated, and standing Indian bear scandary along with a change in term. " Designated bear management area" is not clear and unambiguous for the following reasons;

The NCWRC'S basis for the rule was that the US FOREST SERICE (USFS) requested that they open up the scandaries to hunting due to increased bear- human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear- human conflict. The opposite has been proven. The NCWRC also failed to mention in 2018, and the request was solely for panthertown. Additionally, the problem with bear human conflicts has been subsequently resolved by introducing bear- proof food lockers in 2020. Over the past two years, the US, forest service(USFS) has not received any complaints regarding bear- human conflicts,and there are plans to install more food lockers as proactive measure in preventing future bear- human conflict. For all the reason listed above, request that 15A NCAC 10D.0106 BEAR SCANDARIES NOT be approved by the rules review commission.

Ji Montgomery
2 North stoner ave
Shiremanstown pa 17011
April 8 2022

Thank you for your consideration
Ji Montgomery

McGhee, Dana

From: Reinhard.Doerrenbaecher@t-online.de
Sent: Saturday, April 9, 2022 3:12 AM
To: Rules, Oah; McGhee, Dana
Subject: [External] Trophy Hunting
Attachments: Trophy Hunting.pdf

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Dear Sirs and Madams

attached you will find my protest against trophy hunting on North Carolina bears.

Sincerely

Reinhard Dörrenbächer

Reinhard Dörrenbächer
Radheimer Straße 27a
D 64850Schaafheim
Germany

April 9th, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609
Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.
4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.
3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
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6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Reinhard Dörrenbächer

McGhee, Dana

From: ingris ingris <ingriste@hotmail.com>
Sent: Saturday, April 9, 2022 6:10 AM
To: McGhee, Dana
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Ingris.K

McGhee, Dana

From: Conny <connydehn@gmx.de>
Sent: Saturday, April 9, 2022 8:53 AM
To: McGhee, Dana
Subject: [External] Sanctuaries are for PROTECTION !!!!

Importance: High

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From: Conny [mailto:connydehn@gmx.de]
Sent: Samstag, 9. April 2022 14:50
To: 'rrc.comments@oah.nc.gov'
Subject: Sanctuaries are for PROTECTION !!!!
Importance: High

09/04/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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3. Bears manage their own populations through delayed implantation.

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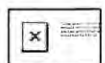
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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Conny Dehn



Virenfrei. www.avast.com

McGhee, Dana

From: Larissa Sarycheva <larus.aug@yandex.ru>
Sent: Saturday, April 9, 2022 9:40 AM
To: McGhee, Dana
Subject: [External] objection

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Members of the Commission:

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Thank you for your consideration.

Larissa Sarycheva

22-57, Marks Av., 249035 Obninsk, Kaluga Region, Russian Federation

McGhee, Dana

From: Tina Pattinson <tina.pattinson@yahoo.co.uk>
Sent: Saturday, April 9, 2022 10:06 AM
To: Rules, Oah; McGhee, Dana
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Thank you for your consideration.

Kind Regards

Tina Pattinson

McGhee, Dana

From: alassio91@aol.com
Sent: Saturday, April 9, 2022 12:24 PM
To: McGhee, Dana
Subject: [External] Fwd: [15A NCAC 10D .0106] Bear Sanctuaries

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From: alassio91@aol.com
To: rrc.comments@oah.nc.gov
Sent: 4/9/2022 12:22:34 PM Eastern Standard Time
Subject: Re: [15A NCAC 10D .0106] Bear Sanctuaries

NEW YORK, 4/9/22

MARINA TIEDEMANN
PO BOX 1147
VALLEY STREAM NY 11582

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

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Thank you for your consideration.

Sincerely,
Marina Tiedemann
Email: alassio91@aol.com

"To my mind, the life of a lamb is no less precious than that of a human being...I hold that, the more helpless a creature, the more entitled it is to protection by man from the cruelty of man." (Mahatma Ghandi)

McGhee, Dana

From: Christine Swoap <clswoap@gmail.com>
Sent: Sunday, April 10, 2022 9:12 AM
To: Rules, Oah; McGhee, Dana
Subject: [External] Maintain bear sanctuary

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Christine LaRocque Swoap
27 Wilhide Road
Asheville, NC 28805

April 10, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

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1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

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5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Christine LaRocque Swoap

Christine LaRocque Swoap

McGhee, Dana

From: Ingo Regier <ingoregier@icloud.com>
Sent: Sunday, April 10, 2022 9:44 AM
To: Rules, Oah; McGhee, Dana
Subject: [External] Bear Sanctuaries 15A NCAC 10D .0106
Attachments: Doc6.docx

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Ingo Regier
1037 Toxaway Drive
Lake Toxaway, NC 28747. USA
Office (828) 877-6406
Mobile (828) 507-0450

Ingo Regier

1037 Toxaway Drive, Lake Toxaway, NC 28747

April 10, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read 'I. Regier', with a stylized flourish at the end.

Ingo Regier

McGhee, Dana

From: Clare Curtis <clare.curtis36@gmail.com>
Sent: Sunday, April 10, 2022 12:15 PM
To: Rules, Oah
Cc: McGhee, Dana
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Clarissa Cherry Curtis
717 Carl Dr; Chapel Hill NC 27516

4/10/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

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Thank you for your consideration.

Clarissa Cherry Curtis

Clarissa Cherry Curtis

McGhee, Dana

From: Brigitte Regier <brigitte-regier@icloud.com>
Sent: Sunday, April 10, 2022 9:21 PM
To: Rules, Oah; McGhee, Dana
Subject: [External] Bear Sanctuaries 15A NCAC 10D .0106
Attachments: NC Wildlife Commission-no bear hunting 04-10.docx

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Brigitte Regier
1037 Toxaway Drive
Lake Toxaway NC, 28747

Brigitte Regier

1037 Toxaway Drive, Lake Toxaway, NC 28747

April 10, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

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Thank you for your consideration.

Brigitte Regier

McGhee, Dana

From: Bill Skinner <billskinner77@gmail.com>
Sent: Sunday, April 10, 2022 4:59 PM
To: McGhee, Dana
Subject: [External] Fwd: URGENT: BEAR SANCTUARIES

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Sent from my iPhone

Begin forwarded message:

From: Nita Hunt <nitah63@gmail.com>
Date: April 10, 2022 at 4:37:26 PM EDT
To: Bill Skinner <billskinner77@gmail.com>
Subject: URGENT: BEAR SANCTUARIES

William Skinner
PO Box 422
2701 Golden Road
Lake Toxaway, NC 28747

4/10/22

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

William Skinner

McGhee, Dana

From: Deborah Palmer <deborahjpalmer@hotmail.co.uk>
Sent: Sunday, April 10, 2022 2:16 PM
To: McGhee, Dana
Cc: Rules, Oah
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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D Palmer
The Shambling Notley Green, CM777GS

10 April 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

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Thank you for your consideration.

Deborah Palmer

Beth and Steve Preston
P.O. Box 1171
320 Turkey Brush Lane
Cashiers, NC 28717

April 4, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Elizabeth (Beth Preston)

A handwritten signature in cursive script that reads "Elizabeth S. Preston". The signature is written in dark ink and is positioned below the typed name.

Bear Education and Resources Task Force (B.E.A.R.)
PO Box 1238
Highlands, NC 28741

March 14, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Cynthia Strain, Chairwoman

A handwritten signature in cursive script, appearing to read "Cynthia Strain".

McGhee, Dana

From: Sherri Ozcomert <sherozcomert@bellsouth.net>
Sent: Wednesday, April 6, 2022 4:15 PM
To: Rules, Oah
Subject: [External] Bear Sanctuaries

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Sherri Ozcomert
446 Worley Rd
Highlands, NC 28741

April 6, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: "**Rule # 15A NCAC 10D.0106 Bear Sanctuaries**"

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Sherri Ozcomert

Sherri Ozcomert
Mobile: 770-265-7175

Do unto those downstream as you would have those upstream do unto you. -Wendell Berry, farmer and author (b. 5 Aug 1934)

Sent from my iPad

Bill and Lindsey Barclift
441 Glenridge Road
Glenville, NC 28736

Tuesday, March 22, 2022

NC Rules Review Commission
1711 New Hope Church Road
Raleigh, NC 27609

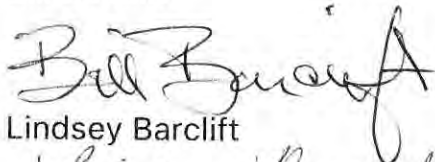
Re: {15A NCAC 10D .0106} Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration,

Bill Barclift



Lindsey Barclift



David H. Cofrin
2065 Cold Mountain Rd
Lake Toxaway, NC 28747

March 18, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

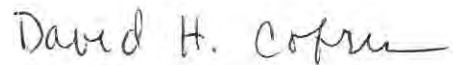
Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

David H. Cofrin



H. A. Moore, III
157 Sheer Rock Road
Glennville, NC 28736

March 23, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

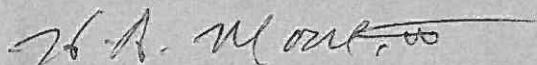
Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

H. A. Moore, III

A handwritten signature in cursive script that reads "H. A. Moore, III". The signature is written in dark ink and is positioned below the typed name.

Mailing: PO Box 804

Cashiers

NC 28717-0804

Physical (adjoins Panthertown): 126 Foggy Ridge Road

Sapphire

NC 28774

March 16, 2022

NC Rules Review Commission

1711 New Hope church Road

Raleigh

NC 27609

Re: 15A NCAC 10D .0106 Bear Sanctuaries

To the Members of the Commission:

I request that the above rule be reviewed in the upcoming legislative session as set out in NC G.S. 150B-21.3.

I further request that the rule be subject to a delayed effective date as set out in that same provision.

Thank you for listening and your consideration.

Sincerely,



Carol A. Wilson

McGhee, Dana

From: Margaret Carton <margcarton@yahoo.com>
Sent: Tuesday, March 15, 2022 2:35 PM
To: Rules, Oah
Subject: [External] Panthertown Bonus Defeat Bear Sanctuary Ruling - Request for Legislative Review
Attachments: Ltr Requesting-Legislative-Review of Bear Sanctuary Decision 3.3.2022.docx

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

To Whom It May Concern:

Please except the attached letter as an official request for Legislative Review of the recent Bear Sanctuary ruling.

Margaret Carton

Margaret Fry Carton
828/743-5753 (Home)
678/878-6853 (Cell)
margcarton@yahoo.com

Margaret and Robert Carton
189 Buffalo Mountain Road
Glennville, NC 28736

Thursday, March 3, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

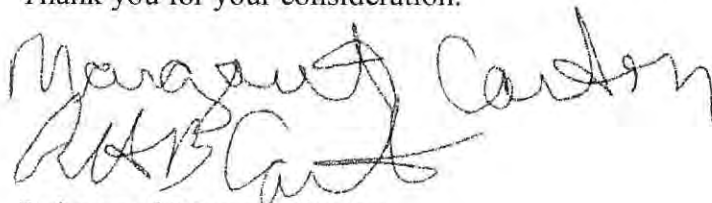
Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

We respectfully request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. The overwhelming response from the public was against bear hunting in Panthertown Valley and the other 2 areas identified in the rule and for the continuation of the Bear Sanctuaries in NC. While there was a problem a few years ago, Bear Wise Education and the installation of bear boxes has dramatically reduced the interaction between bears and people in Panthertown Valley.

We further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Handwritten signatures of Margaret and Robert Carton. The signature for Margaret is written in a cursive style, and the signature for Robert is also cursive and appears to be written over or next to Margaret's signature.

Robert and Margaret Carton

3/10/22

Dear Sir or Madam,

I would like a legislative review of [ISA NCAC 10.D.0106]
Bear Sanctuaries.

I am an avid hiker and volunteer in Panthertown Preserve and also hike in Pisgah. It is unfathomable to me that bear hunting can be permitted. The number of bears is not large and the number of human encounters are uncommon. Those rare encounters usually occur by individuals who leave food about or trash. Those individuals & campers need to be educated rather than disposing of a bear.

An true outdoor lover wants all animals and birds alive it is the hunters that demand their death. The vast majority of those who use the hiking areas are not hunters and the number of letters sent opposing hunting far exceed those wishing it.

My concern is the commissioners who voted to

allow this domination are either hunters
or have been lobbied to vote YEA rather
than NAY.

Please absolutely cancel the possibility
of hunting in these areas. Furthermore
is sending hungry dogs with radio collars
to tree a bear really hunting. This is
the lazy mans way and requires little or
no skill beyond that of training the dogs
and providing little food.

Please Please Reconsider

Michael S Levine MD
PO Box 999
Highlands, NC 28741
ms3levine@gmail.com

McGhee, Dana

From: Brock Kehoe <brockkehoe@gmail.com>
Sent: Tuesday, March 15, 2022 7:00 AM
To: Rules, Oah
Subject: [External] Request for Legislative Review
Attachments: Request for Legislative Review.pdf

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

(Signed Letter Attached)

Brock Kehoe
274 Pepperbush Lane
Tuckasegee, NC
28748
3/15/2022

N.C. Rules Review Commission 1711 New Hope Church Rd. Raleigh, NC 27609 Re: [15A NCAC 10D .0106]

Bear Sanctuaries Members of the Commission: I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Brock Kehoe

Brock Kehoe
274 Pepperbush Lane
Tuckasegee, NC 28748

3/15/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Brock Kehoe

A handwritten signature in black ink, appearing to be 'Brock Kehoe', written in a cursive style.

McGhee, Dana

From: Steve Jackson <svjackson@gmail.com>
Sent: Wednesday, March 9, 2022 2:53 PM
To: Rules, Oah
Subject: [External] Request for legislative review of 15A NCAC 10D .0106
Attachments: Request for Legislative Review.pdf

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Please find attached my request to review the subject regulations in the Panthertown-Bonas Defeat Bear Sanctuary

Thanks,
Steve Jackson

404-395-4235

Steve Jackson
1033 Toxaway Drive
Lake Toxaway, NC 28747

March 9, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

I have included my thoughts regarding this rule in the attached page.

Thank you for your consideration.

Steve Jackson
404-395-4235

I am requesting a legislative review of the recent decision to allow bear hunting in the Panthertown-Bonas Defeat Bear Sanctuary.

My wife and I became full-time residents of Lake Toxaway over a year ago. We are daily users of the Panthertown section that borders our community's property and frequently venture deeper into the National Forest.

The N.C. Wildlife Resources Commission (NCWRC) solicited comments prior to making this decision. They report that 2,744 people sent comments to the NCWRC and 86% were opposed. National forests are owned collectively by the American people and the NCWRC voted unanimously in direct opposition to the input from the vast majority of respondents.

The NCWRC relied upon outdated data to suggest that there are an increasing number of human-bear interactions that justifies thinning the bear populations. Even if the data was current, the data did not indicate whether the encounter was positive or negative. My wife and I have had at least 15 encounters with bears in the last year – and we loved it. All encounters were from a distance and all we had to do was make a little noise and the bear ran off. I've talked to a dozen neighbors who, collectively, have had 100s of bear sightings without a single mishap. Only 1 of these alarmed the person. He was next to a construction dumpster where workers discarded their lunch containers, and the bear became used to a free meal. I believe that almost all the infrequent negative human-bear interaction is the fault of the human.

While I am pro-hunting, I think that hunting with dogs is inhumane for bears and dogs, it's unsporting and lacks fair chase and it disrupts bears and their population. I understand that hunting with dogs is a 'tradition' and part of some people's 'culture'. But we evolve as a species and some things that were once considered 'tradition' is now unacceptable (dog fights, cock fights, leg trap hunting, etc.).

Dogs do not know National Forest boundaries, private property boundaries or sex of the bear they chase. If dog hunting is allowed, we will have negative dog-human and dog-pet interactions in far greater numbers than we ever had with bear.

McGhee, Dana

From: doug fink <doug.j.fink@gmail.com>
Sent: Thursday, March 10, 2022 10:59 AM
To: Rules, Oah
Cc: doug.j.fink@gmail.com
Subject: [External] Request for legislative review and delayed effective date of [15A NCAC 10D .0106] Safeguarding Panthertown-Bonas Defeat Bear Sanctuary

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Office of Administrative Hearings.

>

>

> This is to request a delayed effective date and legislative review of the North Carolina Wildlife Resources Commission's rule change to allow bear hunting in Panthertown, Pisgah, and Standing Indian Bear Sanctuaries.

> There are several reasons, foremost that Panthertown and Pisgah attract thousands of families for hiking. Allowing packs of unleashed hunting dogs chasing bears and hunters discharging firearms in the same area as hikers poses a significant risk of accidental injury or death to children and adults. Hunting and hiking are incompatible activities.

>

> The NC Wildlife Resource Commission's proposed rule changes outline several objectives, including removing "problem bears," but hunts would not specifically target problem bears.

> Two more stated objectives are to reduce human-bear interactions and reverse human-conditioned behavior being observed in local bears. We do not understand how hunting in non-populated areas will reduce human-bear interactions. We would think it would be more likely to flush bears into non-hunting residential areas to escape the dogs.

>

> Finally, human-conditioned behavior should be the responsibility of humans and we would encourage NC Wildlife Resource Commission to continue to focus on human education and distribution of bear proof food and trash storage items.

>

> To summarize, we are strongly opposed to permitting bear hunting in Panthertown.

>

> Thank you for your consideration.

>

> Doug and Carol Fink
530 Cardinal Lake Drive
> Lake Toxaway NC 28747

>

> (704) 756 5859
> Doug.j.fink@gmail.com
> Sent from my iPad

Lisa Wolford
251 Mills Creek Point Rd
Lake Toxaway, NC 28747

March 5, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Lisa Wolford

With 86% of the public opinion against the bear hunt,
it seems disingenuous for you to insinuate that you were
interested in how the local people feel about the bear hunt

McGhee, Dana

From: Lisa Wolford <lisawolford251@gmail.com>
Sent: Saturday, March 5, 2022 2:25 PM
To: Rules, Oah
Subject: [External] Bear hunting in PANTHERTOWN and other locations

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

McGhee, Dana

From: Brigitte Regier <brigitte@icloud.com>
Sent: Sunday, March 6, 2022 9:23 PM
To: Rules, Oah
Subject: [External] Asking for Legislativ Revieww
Attachments: No Bear Hunting Legislativ Review.docx

Brigitte Regier
1037 Toxaway Drive
Lake Toxaway, NC 28747

March , 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Brigitte Regier

McGhee, Dana

From: rosemary livingood <livingoodinalaska@yahoo.com>
Sent: Wednesday, March 9, 2022 4:13 PM
To: Rules, Oah
Subject: [External] [Scan] RRC letter
Attachments: RRC letter.pdf

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.<<mailto:report.spam@nc.gov>>

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Sent with Genius Scan for iOS.
[https://urldefense.com/v3/ https://dl.tglapp.com/genius-scan ;!!HYmSToo!IEu5IF2wrkviVzFTENcmtQg1cZFDCQicij8vfgy3R9nh-tZWSZiWospMxjinksH4jN7M\\$](https://urldefense.com/v3/https://dl.tglapp.com/genius-scan;!!HYmSToo!IEu5IF2wrkviVzFTENcmtQg1cZFDCQicij8vfgy3R9nh-tZWSZiWospMxjinksH4jN7M$)

Sent from my iPhone

3608 Allison Watts Rd
Franklin, NC 28734

March 09, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

I believe the NCWRC erred in its decision by not using the best available science and not listening to the overwhelming public objection to this ruling. Jacob Humm and Joseph Clark from University of Tennessee completed a spatially explicit capture-recapture study in the southern Appalachians to estimate the abundance and harvest rates of female black bears. Using their population estimate of 7318 bears for western NC and NCWRC's mortality (harvest and non-harvest) data for 2017 and 2018, 20.14% of bears in western NC were killed during those years. This number could be quite higher because illegally poached bears were greatly underestimated in the mortality data. Given the unknown poaching rate, the total mortality rate could be approaching the maximum sustainable mortality of 23%. Given that the NCWRC currently relies on population estimates back calculated from harvest data 3 years before the data is collected, the NCWRC would be unaware of a decline in the population for three years, so no ameliorating management practices would occur for that length of time. Because bears have such a low recruitment rate, errors in management can have severe, long-term effects on the population. Additionally, climate shift's effect on mast and berry production and the conversion of forested habitat into residential developments are putting more pressure on the bear population. The bear sanctuaries were designed to give mothers with cubs a safe place to be to ensure a viable population. Opening them up to bear hunting would negate the beneficial effects of having this buffer.

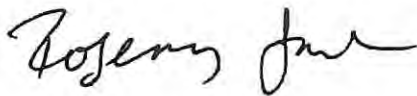
7620 people signed a petition asking for three bear sanctuaries to maintain their unharvested designation, and 86% of the 2744 people who commented directly to NCWRC were opposed to this ruling. The NCWRC keeps insisting that the bear population be limited to a social carrying capacity based on a public opinion survey taken 17 years ago. Obviously an updated survey needs to be taken. If the NCWRC comments are indicative

of the general public opinion toward bears, the NCWRC is obviously not basing their decision on current public opinion.

With neither science nor public opinion supporting their decision, NCWRC has unilaterally decided to change the status of the Bear Sanctuaries. I don't see any justification for their decision. Please review their ruling while keeping in mind that the most fundamental principle of wildlife management is the concept of wildlife as a public trust. Wildlife belongs to the public and is held in trust for the public by government.

I just moved from Haines, AK to the edge of Standing Indian Bear Sanctuary near Franklin, NC. I am a wildlife biologist who has worked on numerous grizzly bear studies including my MS thesis investigating system dynamics of Yellowstone's grizzly bears, their changing habitat, and management practices. If you have any questions or want to discuss this matter further, please contact me at livingoodinalaska@yahoo.com.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Rosemary Jackson". The signature is written in a cursive, flowing style.

Rosemary Jackson

McGhee, Dana

From: Nancy West <tomandnancywest@gmail.com>
Sent: Wednesday, March 9, 2022 3:51 PM
To: Rules, Oah
Subject: [External] Allowing Bear Hunting in Panthertown Rule change

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Anne West
310 Bald Rock Dr W, Sapphire, NC 28774
Sapphire, NC 28774

March 10, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Sincerely,
Anne West

McGhee, Dana

From: smssl1 <smssl1@gmail.com>
Sent: Friday, March 11, 2022 12:50 PM
To: Rules, Oah; Snyder, Ashley B
Subject: [External] Legislative review and delayed effective date: 15A NCAC 10D .0106
Attachments: Legislative review of Bear Hunting rule.docx

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Please find attached and below a letter requesting legislative review and a delayed effective date for rule 15A NCAC 10D .0106.

March 11, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Kevin Matto
923 Peregrine Point
Lake Toxaway, NC 28747

Kevin Matto
923 Peregrine Point
Lake Toxaway, NC 28747

March 11, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Kevin Matto

Burgos, Alexander N

From: msamuel msamuel <msamuel@sympatico.ca>
Sent: Monday, April 11, 2022 12:43 AM
To: rrc.comments; Rules, Oah; McGhee, Dana; Duke, Lawrence
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries
Attachments: LetterOpposingHuntingInSanctuaries.pdf

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

To

Office of Administrative Hearings
1711 New Hope Church Rd.
Raleigh, NC 27609.

And

Dana McGhee

The Agency's Rulemaking Coordinator

From: Margaret Samuel

20 Bay Street, Suite 1100

Toronto, Ontario

M5J 2N8

April 11, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to

"designated bear management areas" is **not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Margaret Samuel

Signature of Margaret Samuel

Burgos, Alexander N

From: gabrielanu@hotmail.com
Sent: Friday, April 8, 2022 5:39 PM
To: Rules, Oah; rrc.comments
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the

McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners.

Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Anya Anosova

Burgos, Alexander N

From: Mary Shabbott <mshabbott@sbcglobal.net>
Sent: Friday, April 8, 2022 5:36 PM
To: rrc.comments
Subject: [External] Bear sanctuaries

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Mary Shabbott
10249 Acorn Trail Punta Gorda Florida 33950

04-08-2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

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there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

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3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

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3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

I have visited North Carolina many times. I will not be back to spend money unless these bears are protected in designated sanctuaries where NO hunting is allowed.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you,
Mary Shabbott

Burgos, Alexander N

From: Eli Celli <elicelli@att.net>
Sent: Friday, April 8, 2022 5:16 PM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] 15A NCAC 10D .0106 Bear Sanctuaries

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Eli Celli
407 Legends Way
Chapel Hill, NC 27516
April 8, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: 15A NCAC 10D .0106 Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

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The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

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3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.
Eli Celli

Burgos, Alexander N

From: kim hart <kimahart@att.net>
Sent: Friday, April 8, 2022 5:12 PM
To: rrc.comments
Cc: Rules, Oah; McGhee, Dana
Subject: [External] 15A NCAC 10D .0106] Bear Sanctuaries

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April 8, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is not clear and unambiguous for the following reasons;**

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conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

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The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

Lastly, I find North Carolina to be a beautiful state to travel and spend my tourist dollars. However, I find North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management to be incomprehensible. Therefore, I could not, in good conscious, continue to spend my time or money within the state of North Carolina.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Sincerely,
Kim Hart

Kim Hart
1165 E. 61st Street
Chicago, IL 60637

Burgos, Alexander N

From: Christina DeRespiris <cderespiris@yahoo.com>
Sent: Friday, April 8, 2022 5:03 PM
To: rrc.comments; Rules, Oah
Cc: McGhee, Dana
Subject: [External] [15A NCAC 10D .0106] Bear Sanctuaries

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C. DeRespiris
777 Pelham Road
New Rochelle, NY 10805
April 8, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Christina DeRespiris
cderespiris@yahoo.com

Burgos, Alexander N

From: Brenda Hatch <brenda@hotelpatios.com>
Sent: Friday, April 8, 2022 4:59 PM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] 15A NCAC 10D .0106 Bear Sanctuaries

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From Brenda Hatch
111 NC Highway 32 N, Sunbury, North Carolina, 27979

April 8th, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Brenda Hatch

Signed Brenda Hatch

Burgos, Alexander N

From: Caroline Van Haeften <carolinevanhaefte@yahoo.ca>
Sent: Friday, April 8, 2022 6:32 PM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

North Carolina government officials are not backward people that live by old traditions, I would like to think that the 'Members of the Commission' are forward thinkers, the time has come to make decisions that protect nature & wildlife. Hunters are so emotional about killing, they want to continue the hunt at all costs.

Bear hunting in the three bear sanctuaries will deter people from visiting and, therefore, negatively impact your business. If you travel to North Carolina, state that you will not return until the rules are reversed. Bears manage their own populations, nature takes care of itself, in my opinion it is only when humans interfere that trouble occurs. Hunting does not reduce bear-human conflicts.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **OMG** bears should be allowed to roam free, not chased by humans & dogs, bears running away get shot in the back! What kind of human being has a passion to kill?

Being human means we are not robots, most humans have compassion & regard for wildlife. Cruel is cruel, callous is callous. I am not emotional when I say this, I say this as fact.

Thank you for the privilege of sending this email.

Sincerely,

Caroline Van Haefen

Burgos, Alexander N

From: Tom Antony <tomantony@yahoo.com>
Sent: Friday, April 8, 2022 6:30 PM
To: rrc.comments
Cc: McGhee, Dana
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Tom Antony

112 Cypress Ave,
Santa Clara CA 95050

08-APR-2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration,

Tom Antony.

Burgos, Alexander N

From: Bennett Morgan <bennettscottmorgan@gmail.com>
Sent: Friday, April 8, 2022 6:19 PM
To: Duke, Lawrence; rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Members of the Commission:

[15A NCAC 10D .0106] Bear Sanctuaries

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed

implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

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3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Bennett Morgan
Lake Toxaway, North Carolina

Burgos, Alexander N

From: Denise Motta <denmot@cybercon.net>
Sent: Friday, April 8, 2022 6:12 PM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Bear Sanctuaries [15A NCAC 10D .0106]

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.<mailto:report.spam@nc.gov>

To: Members of the Commission and Dana McGhee, Publications Coordinator

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.
4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

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1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
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2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Denise Motta, NSCA-CPT, E-RYT500
Yoga, Pilates & Fitness Instructor
denmot@cybercon.net

8038 Mackenzie Rd. St. Louis, MO 63123

Burgos, Alexander N

From: Erika Gettig <erika.gettig@saintandrews.net>
Sent: Friday, April 8, 2022 5:45 PM
To: Rules, Oah; McGhee, Dana; rrc.comments
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries
Attachments: bear letter.pdf

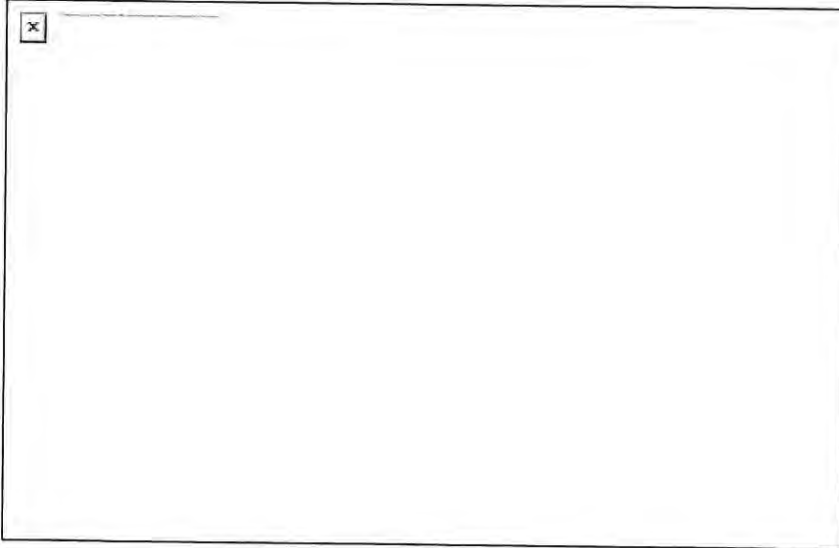
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Dear committee members,

As a summer visitor to Brevard, North Carolina, and specifically Pisgah Forest, for the last 12 years, I believe it's important for committee members to hear the perspective of tourists who are committed to spending money in the towns that surround state and national forests as well as designated wildlife areas. North Carolina's approach to managing those forests and wildlife can inspire and attract tourists, it can also disgust and repulse them. Thank you for considering the details of my formal comment attached in a letter form as a pdf.

Thank you.

--



Erika Gettig

PO Box 1068
Lake Worth Beach, FL 33460

April 8, 2022

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

As an annual summer visitor to Brevard, North Carolina, and specifically Pisgah National Forest, I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

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3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

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the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

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5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

A handwritten signature in black ink, consisting of a stylized 'E' followed by a 'G' and a flourish.

Erika Gettig

Andrew
Somerdale, NJ

4/8/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

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Thank you for your consideration.

Andrew

Burgos, Alexander N

From: Gayle Martin <martingayle@hotmail.com>
Sent: Friday, April 8, 2022 8:07 PM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] URGENT: Call To Action For North Carolina Bears

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Dr Gayle Martin

844 Hillside Ave, Glen Ellyn, IL 60137

04/08/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

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4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Dr Gayle Martin

Sent from my iPhone

Burgos, Alexander N

From: shelleymmc@aol.com
Sent: Friday, April 8, 2022 7:36 PM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] [15A NCAC 10D .0106] Bear Sanctuaries

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3-8-22

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

S McKee

Burgos, Alexander N

From: michaelwauschek <michaelwauschek@yahoo.com>
Sent: Friday, April 8, 2022 7:15 PM
To: rrc.comments
Subject: [External] FW: Protection of bears aka life

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Sent from my Metro By T-Mobile 4G LTE Android Device

----- Original message -----

From: michaelwauschek <michaelwauschek@yahoo.com>
Date: 4/8/22 4:13 PM (GMT-08:00)
To: dana.mcghee@oah.nc.gov
Subject: Protection of bears aka life

Hello my name is Michael Wauschek
4/8/22

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

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that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

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5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules

Sent from my Metro By T-Mobile 4G LTE Android Device

Burgos, Alexander N

From: Paul Murphy <redcliffePaulMurphyredcliffe@hotmail.com>
Sent: Friday, April 8, 2022 10:51 PM
To: Rules, Oah; McGhee, Dana; rrc.comments
Subject: [External] N.C. Bears Living In Bear Sanctuaries.

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is not clear and unambiguous for the following reasons;**

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3. Bears manage their own populations through delayed implantation.

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travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

The Murphy and Hume families.

Burgos, Alexander N

From: P M <lilacsnowleopard@gmail.com>
Sent: Friday, April 8, 2022 10:34 PM
To: rrc.comments; Rules, Oah; dana.mcghee@oah.nc
Subject: [External] URGENT: "Take Action Now To Save North Carolina Bears"

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"It is time for the immediate reversal of the North Carolina Wildlife Resources Commission (NCWRC) newly adopted rule that opens up the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries (92,500 acres) to bear hunting, hunting with dogs and changes the term "designated bear sanctuary" to "designated bear management area.". "

URGENT: "Take Action Now To Save North Carolina Bears"
April 8, 2022

To the individuals below:

"Staff Attorney

Lawrence Duke, Commission Counsel.

lawrence.duke@oah.nc.gov

rrc.comments@oah.nc.gov.

oah.rules@oah.nc.gov

Dana Mcghee, Publications Coordinator

dana.mcghee@oah.nc.gov"

Patricia Meuler

PO Box 124

Two Rivers WI 54241

April 8, 2022

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: "[15A NCAC 10D .0106] Bear Sanctuaries"

"Members of the Commission":

"I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

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4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission."

Thank you for your consideration.

electronically signed
Patricia Meuler

Burgos, Alexander N

From: angei angei <angelica87@hotmail.com>
Sent: Saturday, April 9, 2022 6:08 AM
To: rrc.comments
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Angela

Burgos, Alexander N

From: Martin Middleton <mtmiddleton01@gmail.com>
Sent: Saturday, April 9, 2022 6:05 AM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Bear Sanctuaries

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

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4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.
3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

M T Middleton

Burgos, Alexander N

From: pomai stone <pomaistone@gmail.com>
Sent: Saturday, April 9, 2022 3:31 AM
To: rrc.comments; Rules, Oah
Cc: McGhee, Dana
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision. I frequently travel to North Carolina, and I will not return until the rules are reversed

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration and for upholding your responsibility to steward life.

Johanna K Stone

--
na-u me ke aloha
na Johanna Kapōmaika'i Stone
.:me he lau no ke Ko'olau ke aloha:.

Burgos, Alexander N

From: teseo staffilani <tesilibeo@hotmail.it>
Sent: Saturday, April 9, 2022 3:25 AM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Tortoreto il 09/04/2022
Teseo Staffilani
Italia,

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609
Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is not clear and unambiguous for the following reasons;**

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-

hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

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6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Burgos, Alexander N

From: LIN BOND <suetlingale@yahoo.co.uk>
Sent: Saturday, April 9, 2022 9:38 AM
To: Duke, Lawrence
Cc: McGhee, Dana; rrc.comments; Rules, Oah
Subject: [External] Save North Carolina Bears

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Dear Members of the Commission

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is not clear and unambiguous for the following reasons;**

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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Yours faithfully

Lin Bond

Burgos, Alexander N

From: Larissa Sarycheva <larus.aug@yandex.ru>
Sent: Saturday, April 9, 2022 9:32 AM
To: rrc.comments; Rules, Oah
Subject: [External] objection

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Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Larissa Sarycheva

22-57 Marks Av., Obninsk, Kaluga Region, 249035 Russian Federation

Burgos, Alexander N

From: Valentina van Dijk <dakovkic@hotmail.com>
Sent: Saturday, April 9, 2022 9:06 AM
To: Duke, Lawrence; Rules, Oah; McGhee, Dana; rrc.comments
Subject: [External] URGENT REQUES!!

Importance: High

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3.

I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is not clear and unambiguous for the following reasons;**

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Valentina van Dijk

Burgos, Alexander N

From: Conny <connydehn@gmx.de>
Sent: Saturday, April 9, 2022 8:50 AM
To: rrc.comments
Subject: [External] Sanctuaries are for PROTECTION !!!!

Importance: High

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09/04/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Conny Dehn



Virenfrei. www.avast.com

Burgos, Alexander N

From: Onno van Horn <ovanhorn@gmail.com>
Sent: Saturday, April 9, 2022 7:35 AM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External]

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Onno van Horn
De Hoper 160
1511HP
Oostzaan
The Netherlands

04-09-2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the

rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Onno van Horn

Burgos, Alexander N

From: Charles Reihl <charlesreihl@hotmail.com>
Sent: Saturday, April 9, 2022 3:35 PM
To: Rules, Oah; McGhee, Dana; rrc.comments
Subject: [External] [15A NCAC 10D .0106] Bear Sanctuaries

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Charles Reihl

4347 Old Mintz Hwy
Roseboro, NC
28383

4/9/2022

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

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4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy;

1. The Pisgah, Panthertown-Bonas Defeat and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

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5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Charles Reihl

Sent from my iPhone

Burgos, Alexander N

From: Melissa Gylstrand <melissalehane@gmail.com>
Sent: Saturday, April 9, 2022 2:36 PM
To: rrc.comments
Cc: McGhee, Dana; Rules, Oah
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

--

Thank you,

Melissa Gylstrand-Smith
Cell: 828.767.9963

Burgos, Alexander N

From: dusty115@juno.com
Sent: Saturday, April 9, 2022 1:35 PM
To: rrc.comments
Cc: Rules, Oah; McGhee, Dana
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Quenna Moore
2973 Baytree Court
Rochester, Mi 48306

4/8/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons; 1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Quenna Moore

Burgos, Alexander N

From: alassio91@aol.com
Sent: Saturday, April 9, 2022 12:23 PM
To: rrc.comments
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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NEW YORK, 4/9/22

MARINA TIEDEMANN
PO BOX 1147
VALLEY STREAM NY 11582

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Sincerely,
Marina Tiedemann
Email: alassio91@aol.com

**"To my mind, the life of a lamb is no less precious than that of a human being...I hold that, the more helpless a creature, the more entitled it is to protection by man from the cruelty of man."
(Mahatma Ghandi)**

Burgos, Alexander N

From: Klari Lea <klarialker@dnet.net>
Sent: Saturday, April 9, 2022 12:16 PM
To: rrc.comments; Rules, Oah
Cc: McGhee, Dana
Subject: [External] [15A NCAC 10D .0106] Bear Sanctuaries
Attachments: Klari Lea Letter to RRC 4-9-2022.docx

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Klari Lea
P.O. Box 682
Townsend, TN 37882

April 9, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Dear Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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3. The bear hunting season is a popular time for tourism (leaf season).
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5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Respectfully,
Klari Lea

Klari Lea
P.O. Box 682
Townsend, TN 37882

April 9, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Dear Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is not clear and unambiguous for the following reasons:**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.
4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above):

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact):

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.
3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Respectfully,
Klari Lea

Burgos, Alexander N

From: Bill Lea <bears@dnet.net>
Sent: Saturday, April 9, 2022 11:58 AM
To: Rules, Oah; rrc.comments
Cc: McGhee, Dana
Subject: [External] 15A NCAC 10D .0106 Bear Sanctuaries
Attachments: Ltr to RRC 4-9-2022 Bill Lea.docx

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Bill Lea
PO Box 682
Townsend, TN 37882
Formerly: 108 Enchanted Lane
Franklin, NC 28734

April 9, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609
oah.rules@oah.nc.gov
rrc.comments@oah.nc.gov
dana.mcghee@oah.nc.gov

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Dear Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

I am writing to you today to object to the recent decision by the NC Wildlife Resources Commission (NCWRC) to open bear hunting on three long-standing black bear sanctuaries (Pisgah Bear Sanctuary, Panthertown – Bonas Defeat Bear Sanctuary, and Standing Indian Bear Sanctuary). I am asking that you please rescind this decision based on the following reasons:

The proposed bear kill and decision is NOT clear and it is ambiguous: Aside from the Panthertown-Bonas Defeat Bear Sanctuary, the NCWRC has not even decided the number of bears they want to kill on the other two bear sanctuaries. They just say they want to have more bears killed. However, their bear population numbers do not justify additional bears being killed. Their reasoning is ambiguous and faulty. In their analysis, they have cited a research study by Dr. Joe Clark, but even Dr. Clark does not understand how the NCWRC has come to its conclusion based on his study. In the research paper, Dr. Clark states, "Harvest rates approached or exceeded a theoretical maximum in some jurisdictions and population trend data indicated population declines in most jurisdictions in recent years. ... (T)his response to recently liberalized harvest regulations was not unexpected..." In addition, by the NCWRC's own admission, they do not know nor have they taken into account the bear mortality numbers or rate from poaching, which can be significant. The reasoning behind the planned bear kill and the numbers justifying the opening of these nearly half a century old bear sanctuaries is not clear and is definitely ambiguous, at best.

The proposed bear kill and decision to suddenly open these decade old bear sanctuaries is not reasonable or necessary: In NCWRC's initial proposal found on page 13 of the *NCWRC Public Hearings 2022-2023 Inland Fishing, Hunting, Trapping and Gameland Regulations* booklet, it states: "Bear G13. Allow permit hunt opportunities on Panthertown-Bonas Defeat, Pisgah, and Standing Indian Bear Sanctuaries in the Mountain Bear Management Unit." The booklet claims: "The U.S. Forest Service has requested that Panthertown-Bonas Defeat Bear Sanctuary be opened to permit bear hunting opportunities due to increased bear-human interactions occurring on both Forest Service property and adjoining private property." In 2018, District Ranger Mike Wilkins of the Nanathala National Forest requested that the NCWRC kill bears in the Panthertown-Bonas Defeat Bear Sanctuary to resolve bear-human interactions. Ranger Wilkins claims he had received several complaints from dispersed campers about bears getting into their food and from a few local homeowners about bears raiding their garbage. Since that time the Forest Service installed a couple of food lockers at the dispersed campsites. When I spoke to the current District Ranger, Troy Waskey, on January 19th of this year, he said

they did not have one bear complaint in 2021 and he doesn't believe they had any bear complaints in 2020. Even if they were still having human-bear conflict issues, everybody knows that the indiscriminate killing of bears by hunting NEVER resolves the issue unless you kill enough bears to essentially eliminate the bear population. Research has well documented this fact. Addressing the problem (campers putting food in protective bear lockers) or handling household garbage responsibly is the only long-term method of resolving such human-bear conflict issues. Arbitrarily killing bears more than four years later and after the bear attractants have been removed is not only not necessary, it is totally ineffective and unreasonable in resolving the issue.

Should the decision be made to open these bear sanctuaries to bear hunting, especially on the Pisgah Bear Sanctuary and the Panthertown-Bonas Defeat Bear Sanctuary, it will certainly result in an economic impact to the local communities: As a former Assistant District Ranger on the Pisgah Ranger District where the Pisgah Bear Sanctuary is located, I can tell you for a fact the area receives more dispersed recreational use of just about any other area within the National Forests in NC system. This area of more than 60,000 acres is bounded by US Highway 276 on the west and the Blue Ridge Parkway runs through the northern portion of Sanctuary of this extremely popular destination of the Pisgah Ranger District. For decades, hikers, backpackers, and campers have come to this area to enjoy its natural beauty, knowing it as one of the few areas they can recreate on National Forest land during the peak fall color season where they will be relatively safe from bear hunters and their free running dogs. These packs of dogs running wild in the woods pose a physical threat to outdoor recreationists as was well-documented when Dr. Kadie Anderson and her two dogs were attacked and nearly killed by bear-hunting dogs in the fall of 2014, when camping on the nearby Nantahala National Forest. Should the Pisgah Bear Sanctuary and the Panthertown – Bonas Defeat Bear Sanctuary area be suddenly opened to bear hunting during the fall color season, it will definitely affect tourism to the areas and thus, have an economic impact on the local economies.

I would like to conclude by saying I believe government rules and regulations should reflect the will of the people. The NCWRC said they received a total of 2,744 comments in response to their proposal to open these three bear sanctuaries to bear hunting. They also said more than 86% of those responses were against their proposed bear kill. These numbers do not even include the petition they received with more than 7500 signatures AGAINST the proposed kill in the bear sanctuaries. This proposed rule change by the NCWRC is not clear and it is ambiguous. It certainly isn't reasonable nor necessary and it will have an impact on several local economies. Finally, the proposal is contrary to the will of the people, including many bear hunters. In a meeting hosted by Representative Gillespie and Senator Corbin held in Clay County on April 6, 2022, in a showing of hands, both bear hunters and nonhunters alike voted UNANIMOUSLY *against* NCWRC's proposed bear hunt in the three bear sanctuaries. I ask that you please block this proposal and rule against it for all of the stated reasons and more outlined in this letter.

Thank you very much for your time in considering my thoughts.

Respectfully,

Bill Lea

BILL LEA
Retired U.S. Forest Service Assistant District Ranger
Pisgah National Forest & Nantahala National Forest

Bill Lea
PO Box 682
Townsend, TN 37882
Formerly: 108 Enchanted Lane
Franklin, NC 28734

April 9, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609
oah.rules@oah.nc.gov
rrc.comments@oah.nc.gov
dana.mcghee@oah.nc.gov

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Dear Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

I am writing to you today to object to the recent decision by the NC Wildlife Resources Commission (NCWRC) to open bear hunting on three long-standing black bear sanctuaries (Pisgah Bear Sanctuary, Panthertown – Bonas Defeat Bear Sanctuary, and Standing Indian Bear Sanctuary). I am asking that you please rescind this decision based on the following reasons:

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Thank you very much for your time in considering my thoughts.

Respectfully,

Bill Lea

BILL LEA
Retired U.S. Forest Service Assistant District Ranger
Pisgah National Forest

Burgos, Alexander N

From: Charesa Harper <charleighh78@yahoo.com>
Sent: Saturday, April 9, 2022 6:19 PM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] 15A NCAC 10D.0106

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Charesa Harper
1217 Tamalpais St.,

Napa, CA 94558

April 9, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest

Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Sincerely,

Charesa Harper

Burgos, Alexander N

From: cassia river <cassiarivera@yahoo.com>
Sent: Saturday, April 9, 2022 6:10 PM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Bear Sanctuary Hunting Proposal

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Cassia Rivera
North Carolina Resident
4/9/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Further investigation into these "human bear conflicts" has shown no quantifiable data to back up these claims. Additionally, the perception of negative bear-human encounters has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
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4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is confusing instead of clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts but education is proven to stem perceived negative encounters.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.
3. The bear hunting season is a popular time for tourism (leaf season) and has the potential for tragic outcomes when out of town guests hike into hunting areas.
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas creating a negative economic impact to these areas.
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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your time and consideration,

Cassia Rivera
Wildlife Conservation Photographer and Bear Educator

Burgos, Alexander N

From: michelle-campbell@tds.net
Sent: Saturday, April 9, 2022 4:31 PM
To: rrc.comments
Cc: McGhee, Dana; Rules, Oah
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Michelle Campbell
721 Lester Davis Rd.,
Waxhaw, NC 28173

4/9/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
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rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

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1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.


Michelle Campbell

Burgos, Alexander N

From: Jeffrey J Zander <jzander@zanderins.com>
Sent: Saturday, April 9, 2022 7:43 PM
To: rrc.comments
Cc: Rules, Oah; McGhee, Dana
Subject: [External] RRC Review of NCWRC Bear Hunting Rules Change
Attachments: Jeffrey J Zander-Bear Hunting Rules change NCWRC- RRC Review.docx



CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.

Please see attached letter outlining our disapproval of the changes proposed and recently approved by the NCWRC related to bear hunting in Western NC.



JEFFREY J. ZANDER
800-356-4282
6213 Charlotte Pike
Nashville, TN 37209

Nationally Endorsed by
DAVE RAMSEY

Share Your Concerns: [Contact Executive Team](#)

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Jeffrey J Zander

2509 Cold Mountain Rd

Lake Toxaway, NC 28747

4/9/22

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
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Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Jeffrey J Zander

Burgos, Alexander N

From: Carter,S <S.Carter@lse.ac.uk>
Sent: Sunday, April 10, 2022 8:50 AM
To: Rules, Oah; McGhee, Dana; rrc.comments
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries /
Attachments: Re - 15A NCAC 10D .0106 - Bear Sanctuaries.pdf

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Sandra Carter
LSE, Houghton St.
London, WC2A 2AE
United Kingdom

April 10th, 2022

N.C. Rules Review
Commission

1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

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The rule will have a negative impact on the state's economy i.e. a harmful economic impact:

1. My family and I love to visit North Carolina as tourists to experience exciting opportunities of seeing bears. This is the only reason we choose to come to visit North Carolina. If the North Carolina Wildlife Resources Commission does not reverse the newly adopted rule that opens up the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries (92,500 acres) to bear hunting, hunting with dogs and change the term "designated bear sanctuary" to "designated bear management area" my family and I will find another part of the world with bear sanctuaries where we will take our holidays and spend our money in future.

2. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears. My family and I have been among those tourists who regularly visit, especially to enjoy bear watching.

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6. Apart from the risks of personal injury, the upsetting sounds and sights of bear hunting and guns being fired is something my family and I would find deeply distressing. The idea that we could be exposed to these harrowing spectacles and noises and is too off putting to contemplate our ever-visiting North Carolina again. I am sure that other tourists would agree with this. It would have a negative impact on residents as well. There are many other places to go where people are not exposed to these traumatic noises and sights.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Many thanks for your consideration.

Sandra Carter

Sandra Carter

 Please consider the environment before printing this e-mail.

Sandra Carter
LSE, Houghton St.
London, WC2A 2AE
United Kingdom
April 10th, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

I thank you for your consideration.

Sandra Carter

Sandra Carter



Please consider the environment before printing this document.

Cheryl V Ward
219 Blueberry Lane
Swannanoa, NC 28778

April 10, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609
oah.rules@oah.nc.gov
rrc.comments@oah.nc.gov
dana.mcghee@oah.nc.gov

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Dear Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

I am writing to you today to object to the recent decision by the NC Wildlife Resources Commission (NCWRC) to open bear hunting on three long-standing black bear sanctuaries (Pisgah Bear Sanctuary, Panthertown – Bonas Defeat Bear Sanctuary, and Standing Indian Bear Sanctuary). I am asking that you please rescind this decision based on the following reasons:

The proposed bear kill and decision is NOT clear and it is ambiguous: Aside from the Panthertown-Bonas Defeat Bear Sanctuary, the NCWRC has not even decided the number of bears they want to kill on the other two bear sanctuaries. They just say they want to have more bears killed. However, their bear population numbers do not justify additional bears being killed. Their reasoning is ambiguous and faulty. In their analysis, they have cited a research study by Dr. Joe Clark, but even Dr. Clark does not understand how the NCWRC has come to its conclusion based on his study. In the research paper, Dr. Clark states, “Harvest rates approached or exceeded a theoretical maximum in some jurisdictions and population trend data indicated population declines in most jurisdictions in recent years. ... (T)his response to recently liberalized harvest regulations was not unexpected....” In addition, by the NCWRC’s own admission, they do not know nor have they taken into account the bear mortality numbers or rate from poaching, which can be significant. The reasoning behind the planned bear kill and the numbers justifying the opening of these nearly half a century old bear sanctuaries is not clear and is definitely ambiguous, at best.

The proposed bear kill and decision to suddenly open these decade old bear sanctuaries is not reasonable or necessary: In NCWRCs initial proposal found on

page 13 of the *NCWRC Public Hearings 2022-2023 Inland Fishing, Hunting, Trapping and Gameland Regulations* booklet, it states: “Bear G13. Allow permit hunt opportunities on Panthertown-Bonas Defeat, Pisgah, and Standing Indian Bear Sanctuaries in the Mountain Bear Management Unit.” The booklet claims: “The U.S. Forest Service has requested that Panthertown-Bonas Defeat Bear Sanctuary be opened to permit bear hunting opportunities due to increased bear-human interactions occurring on both Forest Service property and adjoining private property.” In 2018, District Ranger Mike Wilkins of the Nanathala National Forest requested that the NCWRC kill bears in the Panthertown-Bonas Defeat Bear Sanctuary to resolve bear-human interactions. Ranger Wilkins claims he had received several complaints from dispersed campers about bears getting into their food and from a few local homeowners about bears raiding their garbage. Since that time the Forest Service installed a couple of food lockers at the dispersed campsites. When I spoke to the current District Ranger, Troy Waskey, on January 19th of this year, he said they did not have one bear complaint in 2021 and he doesn’t believe they had any bear complaints in 2020. Even if they were still having human-bear conflict issues, everybody knows that the indiscriminate killing of bears by hunting NEVER resolves the issue unless you kill enough bears to essentially eliminate the bear population. Research has well documented this fact. Addressing the problem (campers putting food in protective bear lockers) or handling household garbage responsibly is the only long-term method of resolving such human-bear conflict issues. Arbitrarily killing bears more than four years later and after the bear attractants have been removed is not only not necessary, it is totally ineffective and unreasonable in resolving the issue.

Should the decision be made to open these bear sanctuaries to bear hunting, especially on the Pisgah Bear Sanctuary and the Panthertown-Bonas Defeat Bear Sanctuary, it will certainly result in an economic impact to the local communities:

As a former Assistant District Ranger on the Pisgah Ranger District where the Pisgah Bear Sanctuary is located, I can tell you for a fact the area receives more dispersed recreational use of just about any other area within the National Forests in NC system. This area of more than 60,000 acres is bounded by US Highway 276 on the west and the Blue Ridge Parkway runs through the northern portion of Sanctuary of this extremely popular destination of the Pisgah Ranger District. For decades, hikers, backpackers, and campers have come to this area to enjoy its natural beauty, knowing it as one of the few areas they can recreate on National Forest land during the peak fall color season where they will be relatively safe from bear hunters and their free running dogs. These packs of dogs running wild in the woods pose a physical threat to outdoor recreationists as was well-documented when Dr. Kadie Anderson and her two dogs were attacked and nearly killed by bear-hunting dogs in the fall of 2014, when camping on the nearby Nantahala National Forest. Should the Pisgah Bear Sanctuary and the Panthertown – Bonas Defeat Bear Sanctuary area be suddenly opened to bear hunting during the fall color season, it will definitely affect tourism to the areas and thus, have an economic impact on the local economies.

I would like to conclude by saying I believe government rules and regulations should reflect the will of the people. The NCWRC said they received a total of 2,744 comments

in response to their proposal to open these three bear sanctuaries to bear hunting. They also said more than 86% of those responses were against their proposed bear kill. These numbers do not even include the petition they received with more than 7500 signatures AGAINST the proposed kill in the bear sanctuaries. This proposed rule change by the NCWRC is not clear and it is ambiguous. It certainly isn't reasonable nor necessary and it will have an impact on several local economies. Finally, the proposal is contrary to the will of the people, including many bear hunters. In a meeting hosted by Representative Gillespie and Senator Corbin held in Clay County on April 6, 2022, in a showing of hands, both bear hunters and nonhunters alike voted UNAMIOUSLY *against* NCWRC's proposed bear hunt in the three bear sanctuaries. I ask that you please block this proposal and rule against it for all of the stated reasons and more outlined in this letter.

Thank you very much for your time in considering my thoughts.

Respectfully,

Cheryl V. Ward

Burgos, Alexander N

From: Clare Curtis <clare.curtis36@gmail.com>
Sent: Sunday, April 10, 2022 12:14 PM
To: rrc.comments
Cc: McGhee, Dana
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Clarissa Cherry Curtis
717 Carl Dr; Chapel Hill NC 27516

4/10/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.
3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Clarissa Cherry Curtis

Clarissa Cherry Curtis

Burgos, Alexander N

From: Jörg Gaiser <JoergGaiser@gmx.net>
Sent: Sunday, April 10, 2022 11:48 AM
To: Duke, Lawrence; rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Bear Sanctuaries

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Dear Ladies and Gentlemen,

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.
4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

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2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.
Thank you for your consideration.

Sincerely,

Jörg Gaiser
Baiersbronn
Germany

Burgos, Alexander N

From: Jason Campbell <jwc1221@tds.net>
Sent: Sunday, April 10, 2022 9:36 AM
To: rrc.comments
Cc: McGhee, Dana; Rules, Oah
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Subject: Re: [15A NCAC 10D .0106] Bear Sanctuaries

Jason Campbell
721 Lester Davis Rd.,
Waxhaw, NC 28173

4/10/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County

Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

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5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Jason Campbell

Burgos, Alexander N

From: Nita Hunt <nitah63@gmail.com>
Sent: Sunday, April 10, 2022 4:32 PM
To: McGhee, Dana; Rules, Oah; rrc.comments
Subject: [External] URGENT: BEAR SANCTUARIES

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Juanita Hunt
PO Box 422
2701 Golden Road
Lake Toxaway, NC 28747

4/10/22

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Juanita Hunt

Burgos, Alexander N

From: Deborah Palmer <deborahjpalmer@hotmail.co.uk>
Sent: Sunday, April 10, 2022 2:17 PM
To: rrc.comments
Cc: Rules, Oah
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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D Palmer
The Shambling Notley Green, CM777GS

10 April 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Deborah Palmer

Burgos, Alexander N

From: Cheryl :-) <cvward01@aol.com>
Sent: Sunday, April 10, 2022 1:23 PM
To: rrc.comments; McGhee, Dana; Rules, Oah
Subject: [External] [15A NCAC 10D .0106] Bear Sanctuaries
Attachments: RRC 4-10-2022 CVW.docx

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.

Cheryl V Ward
219 Blueberry Lane
Swannanoa, NC 28778

April 10, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609
rrc.comments@oah.nc.gov
dana.mcghee@oah.nc.gov
oah.rules@oah.nc.gov

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Dear Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

I am writing to you today to object to the recent decision by the NC Wildlife Resources Commission (NCWRC) to open bear hunting on three long-standing black bear sanctuaries (Pisgah Bear Sanctuary, Panthertown – Bonas Defeat Bear Sanctuary, and Standing Indian Bear Sanctuary). I am asking that you please rescind this decision based on the following reasons:

The proposed bear kill and decision is NOT clear and it is ambiguous: Aside from the Panthertown-Bonas Defeat Bear Sanctuary, the NCWRC has not even decided the number of bears they want to kill on the other two bear sanctuaries. They just say they want to have more bears killed. However, their bear population numbers do not justify additional bears being killed. Their reasoning is ambiguous and faulty. In their analysis, they have cited a research

study by Dr. Joe Clark, but even Dr. Clark does not understand how the NCWRC has come to its conclusion based on his study. In the research paper, Dr. Clark states, “Harvest rates approached or exceeded a theoretical maximum in some jurisdictions and population trend data indicated population declines in most jurisdictions in recent years. ... (T)his response to recently liberalized harvest regulations was not unexpected....” In addition, by the NCWRC’s own admission, they do not know nor have they taken into account the bear mortality numbers or rate from poaching, which can be significant. The reasoning behind the planned bear kill and the numbers justifying the opening of these nearly half a century old bear sanctuaries is not clear and is definitely ambiguous, at best.

The proposed bear kill and decision to suddenly open these decade old bear sanctuaries is not reasonable or necessary: In NCWRCs initial proposal found on page 13 of the *NCWRC Public Hearings 2022-2023 Inland Fishing, Hunting, Trapping and Gameland Regulations* booklet, it states: “Bear G13. Allow permit hunt opportunities on Panthertown-Bonas Defeat, Pisgah, and Standing Indian Bear Sanctuaries in the Mountain Bear Management Unit.” The booklet claims: “The U.S. Forest Service has requested that Panthertown-Bonas Defeat Bear Sanctuary be opened to permit bear hunting opportunities due to increased bear-human interactions occurring on both Forest Service property and adjoining private property.” In 2018, District Ranger Mike Wilkins of the Nanathala National Forest requested that the NCWRC kill bears in the Panthertown-Bonas Defeat Bear Sanctuary to resolve bear-human interactions. Ranger Wilkins claims he had received several complaints from dispersed campers about bears getting into their food and from a few local homeowners about bears raiding their garbage. Since that time the Forest Service installed a couple of food lockers at the dispersed campsites. When I spoke to the current District Ranger, Troy Waskey, on January 19th of this year, he said they did not have one bear complaint in 2021 and he doesn’t believe they had any bear complaints in 2020. Even if they were still having human-bear conflict issues, everybody knows that the indiscriminate killing of bears by hunting NEVER resolves the issue unless you kill enough bears to essentially eliminate the bear population. Research has well documented this fact. Addressing the problem (campers putting food in protective bear lockers) or handling household garbage responsibly is the only long-term method of resolving such human-bear conflict issues. Arbitrarily killing bears more than four years later and after the bear attractants have been removed is not only not necessary, it is totally ineffective and unreasonable in resolving the issue.

Should the decision be made to open these bear sanctuaries to bear hunting, especially on the Pisgah Bear Sanctuary and the Panthertown-Bonas Defeat Bear Sanctuary, it will certainly result in an economic impact to the local communities: As a former Assistant District Ranger on the Pisgah Ranger District where the Pisgah Bear Sanctuary is located, I can tell you for a fact the area receives more dispersed recreational use of just about any other area within the National Forests in NC system. This area of more than 60,000 acres is bounded by US Highway 276 on the west and the Blue Ridge Parkway runs through the northern portion of Sanctuary of this extremely popular destination of the Pisgah Ranger District. For decades, hikers, backpackers, and campers have come to this area to enjoy its natural beauty, knowing it as one of the few areas they can recreate on National Forest land during the peak fall color

season where they will be relatively safe from bear hunters and their free running dogs. These packs of dogs running wild in the woods pose a physical threat to outdoor recreationists as was well-documented when Dr. Kadie Anderson and her two dogs were attacked and nearly killed by bear-hunting dogs in the fall of 2014, when camping on the nearby Nantahala National Forest. Should the Pisgah Bear Sanctuary and the Panthertown – Bonas Defeat Bear Sanctuary area be suddenly opened to bear hunting during the fall color season, it will definitely affect tourism to the areas and thus, have an economic impact on the local economies.

I would like to conclude by saying I believe government rules and regulations should reflect the will of the people. The NCWRC said they received a total of 2,744 comments in response to their proposal to open these three bear sanctuaries to bear hunting. They also said more than 86% of those responses were against their proposed bear kill. These numbers do not even include the petition they received with more than 7500 signatures AGAINST the proposed kill in the bear sanctuaries. This proposed rule change by the NCWRC is not clear and it is ambiguous. It certainly isn't reasonable nor necessary and it will have an impact on several local economies. Finally, the proposal is contrary to the will of the people, including many bear hunters. In a meeting hosted by Representative Gillespie and Senator Corbin held in Clay County on April 6, 2022, in a showing of hands, both bear hunters and nonhunters alike voted UNAMIOUSLY *against* NCWRC's proposed bear hunt in the three bear sanctuaries. I ask that you please block this proposal and rule against it for all of the stated reasons and more outlined in this letter.

Thank you very much for your time in considering my thoughts.

Respectfully,

Cheryl V. Ward

Intuition is loving guidance

Cheryl Ward, AKA "Mamma Bear"

Burgos, Alexander N

From: Bill Skinner <billskinner77@gmail.com>
Sent: Sunday, April 10, 2022 4:58 PM
To: rrc.comments
Subject: [External] Fwd: URGENT: BEAR SANCTUARIES

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Sent from my iPhone

Begin forwarded message:

From: Nita Hunt <nitah63@gmail.com>
Date: April 10, 2022 at 4:37:26 PM EDT
To: Bill Skinner <billskinner77@gmail.com>
Subject: URGENT: BEAR SANCTUARIES

William Skinner
PO Box 422
2701 Golden Road
Lake Toxaway, NC 28747

4/10/22

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation.

This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy;

1. The Pisgah, Panthertown-Bonas Defeat and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect

people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

William Skinner

Burgos, Alexander N

From: Kyla Ye <kylaye1570@gmail.com>
Sent: Sunday, April 10, 2022 11:20 PM
To: rrc.comments; Rules, Oah
Cc: McGhee, Dana
Subject: [External] [15A NCAC 10D .0106] Bear Sanctuaries

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Members of the Commission:

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Thank you for your consideration.

Kyla Ye,

Burgos, Alexander N

From: Adam Mills <adammills805@gmail.com>
Sent: Sunday, April 10, 2022 8:23 PM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Bear Sanctuaries

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Adam Mills
408 Depot Street Asheville NC 28801

4-10-22

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Adam Mills

Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:36 PM
To: Burgos, Alexander N
Subject: FW: [External] Bear Sanctuaries

From: Mary Shabbott <mshabbott@sbcglobal.net>
Sent: Friday, April 8, 2022 5:39 PM
To: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] Bear Sanctuaries

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Mary Shabbott
10249 Acorn Trail Punta Gorda Florida 33950

04-08-2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

I have visited North Carolina many times. I will not be back to spend money unless these bears are protected in designated sanctuaries where NO hunting is allowed.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you,
Mary Shabbott

Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:36 PM
To: Burgos, Alexander N
Subject: FW: [External] Bear killing

From: Denise et Jacques <inkelstamour@videotron.ca>
Sent: Friday, April 8, 2022 5:10 PM
To: Rules, Oah <oah.rules@oah.nc.gov>
Cc: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] Bear killing

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Members of the Commission:

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Thank you for your consideration.

Denise Inkel
Montreal Canada

Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:34 PM
To: Burgos, Alexander N
Subject: FW: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

From: ingris ingris <ingriste@hotmail.com>
Sent: Saturday, April 9, 2022 6:10 AM
To: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Thank you for your consideration.

Ingris.K

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Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:37 PM
To: Burgos, Alexander N
Subject: FW: [External] Protection of bears aka life

From: michaelwauschek <michaelwauschek@yahoo.com>
Sent: Friday, April 8, 2022 7:14 PM
To: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] Protection of bears aka life

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Hello my name is Michael Wauschek
4/8/22

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy;

1. The Pisgah, Panthertown-Bonas Defeat and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules

Sent from my Metro By T-Mobile 4G LTE Android Device

Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:33 PM
To: Burgos, Alexander N
Subject: FW: [External] objection

From: Larissa Sarycheva <larus.aug@yandex.ru>
Sent: Saturday, April 9, 2022 9:40 AM
To: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] objection

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Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

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2. Hunting does not reduce bear-human conflicts.

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3. The bear hunting season is a popular time for tourism (leaf season).
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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Larissa Sarycheva

22-57, Marks Av., 249035 Obninsk, Kaluga Region, Russian Federation

Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:33 PM
To: Burgos, Alexander N
Subject: FW: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

From: Tina Pattinson <tina.pattinson@yahoo.co.uk>
Sent: Saturday, April 9, 2022 10:06 AM
To: Rules, Oah <oah.rules@oah.nc.gov>; McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Members of the Commission:

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Kind Regards

Tina Pattinson

Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:38 PM
To: Burgos, Alexander N
Subject: FW: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

From: Claire Flewitt <claireflewitt@hotmail.com>
Sent: Friday, April 8, 2022 9:07 PM
To: Rules, Oah <oah.rules@oah.nc.gov>; McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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N.C. Rules Review Commission

1711 New Hope Church Rd.
Raleigh, NC 27609

Members of the Commission:

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Thank you for your consideration.

Claire E. Flewitt

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Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:26 PM
To: Burgos, Alexander N
Subject: FW: [External] Fwd: URGENT: BEAR SANCTUARIES

From: Bill Skinner <billskinner77@gmail.com>
Sent: Sunday, April 10, 2022 4:59 PM
To: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] Fwd: URGENT: BEAR SANCTUARIES

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Sent from my iPhone

Begin forwarded message:

From: Nita Hunt <nitah63@gmail.com>
Date: April 10, 2022 at 4:37:26 PM EDT
To: Bill Skinner <billskinner77@gmail.com>
Subject: URGENT: BEAR SANCTUARIES

William Skinner
PO Box 422
2701 Golden Road
Lake Toxaway, NC 28747

4/10/22

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

William Skinner

Ingo Regier

1037 Toxaway Drive, Lake Toxaway, NC 28747

April 10, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

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Thank you for your consideration.

A handwritten signature in black ink, appearing to read "I. Regier". The signature is fluid and cursive, with a large initial "I" and a stylized "R".

Ingo Regier

Grace Scalzo
216 Fox Hill
Spring Branch, TX 78070

April 13, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a

single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Grace Scalzo

Theodore R. Scalzo
216 Fox Hill
Spring Branch, TX 78070

April 13, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision

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single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

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Thank you for your consideration.

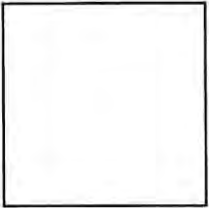
Theodore R. Scalzo

Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:20 PM
To: Burgos, Alexander N
Subject: FW: [External] 15A NCAC 10D .0106 Bear Sanctuaries

From: Tom DS <thunderlight77@gmail.com>
Sent: Wednesday, April 13, 2022 9:48 PM
To: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] 15A NCAC 10D .0106 Bear Sanctuaries

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Tom Dasilva

2904 wood st.

Sarasota, Florida 34237

04/13/2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with

a change in the term "designated bear sanctuaries to "designated bear management areas" is **not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.
4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Tom DaSilva

Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:19 PM
To: Burgos, Alexander N
Subject: FW: [External] Bear Sanctuary vs Bear Management Areas

From: Robin Davis <1jaxmom@gmail.com>
Sent: Wednesday, April 13, 2022 10:24 PM
To: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] Bear Sanctuary vs Bear Management Areas

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted a rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas." **This is not clear and is ambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Further investigation into these "human bear conflicts" has shown no quantifiable data to back up these claims. Additionally, the perception of negative bear-human encounters has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.
4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is confusing instead of clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts. This is an example of proper and successful management of the bear population in action.
2. Hunting does not reduce bear-human conflicts; in contrast education is proven to stem perceived negative encounters.

3. Science and data show that bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including hunters. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The proposed bear hunting season is a popular time for tourism (leaf season) and has the potential for tragic outcomes when out-of-town guests hike into hunting areas.

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas creating a negative economic impact to these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your time and consideration of the protection of all of the resources of our beautiful state.

--

Robin Davis

1jaxmom@gmail.com

Phone 336-508-6820

Greensboro, NC

"I want people to care,
to fall in love,
to take action."

~Joel Sartore



Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:17 PM
To: Burgos, Alexander N
Subject: FW: [External] Stop the NC bear hunting 21st Apr 22.

From: Natasha Bready <natashabready@icloud.com>
Sent: Thursday, April 14, 2022 7:45 AM
To: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] Stop the NC bear hunting 21st Apr 22.

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and

there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

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Thank you for your consideration and time

On this painful subject today.

Natasha

Sent from my iPhone

Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:16 PM
To: Burgos, Alexander N
Subject: FW: [External] Bear Sanctuaries

From: K. Shehan <kim_shehan@yahoo.com>
Sent: Thursday, April 14, 2022 8:47 AM
To: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] Bear Sanctuaries

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Kimberly Shehan
118 Pinewood Dr.
Somerville, AL 35670

4/14/22

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

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6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Kimberly Shehan

Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:15 PM
To: Burgos, Alexander N
Subject: FW: [External]

From: Stacy Cook <stacycook72.sc@gmail.com>
Sent: Thursday, April 14, 2022 9:45 AM
To: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External]

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[Name]
[Address]

[Date]

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609
Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries, along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full

of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.
3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Stacy R Baker

Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:15 PM
To: Burgos, Alexander N
Subject: FW: [External] Fw: Bear Sanctuaries

From: TERESA PENDLETON <countryms39@aol.com>
Sent: Thursday, April 14, 2022 9:51 AM
To: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] Fw: Bear Sanctuaries

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Lynne Pendleton
4760 Kemp Dellinger Rd
Maiden, NC 28650

April 14, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries, along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the

past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Lynne Pendleton

Sent from the all new AOL app for Android

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Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:12 PM
To: Burgos, Alexander N
Subject: FW: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

From: sophie milano <lovemilano@outlook.com>
Sent: Thursday, April 14, 2022 2:20 PM
To: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries, along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and is ambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Sophie Milano.

Burgos, Alexander N

From: McGhee, Dana
Sent: Monday, April 18, 2022 2:14 PM
To: Burgos, Alexander N
Subject: FW: [External] [15A NCAC 10D .0106] Bear Sanctuaries

From: Heather Russell <ncbirdnerd@gmail.com>
Sent: Thursday, April 14, 2022 10:49 AM
To: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] [15A NCAC 10D .0106] Bear Sanctuaries

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is NOT CLEAR and AMBIGUOUS for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Further investigation into these "human bear conflicts" has shown no quantifiable data to back up these claims. Additionally, the perception of negative bear-human encounters has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.
4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is confusing instead of clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts but education is proven to stem perceived negative encounters.
3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy. Panthertown is touted to be the "Yosemite of the East". As an avid nature lover and wildlife photographer I enjoy exploring the trails in Panthertown. I enjoy the peacefulness I find there on the trails. I also enjoy sitting, watching and photographing the waterfalls. I imagine it would be quite a different environment if it were to be opened up to bear hunting. I know, I myself would NOT want to be on the trails with hunters, their guns and dogs! I can honestly say that in all my time in Panthertown I have never had a bear encounter. I would truly reconsider visiting Panthertown and the area (since Panthertown is a main draw) if it were opened to hunting.
3. The bear hunting season is a popular time for tourism (leaf season) and has the potential for tragic outcomes when out-of-town guests hike into hunting areas.
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas creating a negative economic impact to these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your time and consideration,

Heather Russell
Phone: 336-264-1266
email: ncbirdnerd@gmail.com
Instagram: @ncbirdnerd and @naturecapturedbyheather

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Burgos, Alexander N

From: Rules, Oah
Sent: Monday, April 18, 2022 1:58 PM
To: Burgos, Alexander N
Subject: FW: [External] Stop the NC bear hunting 21st Apr 22.

From: Natasha Bready <natashabready@icloud.com>
Sent: Thursday, April 14, 2022 7:41 AM
To: Rules, Oah <oah.rules@oah.nc.gov>
Subject: [External] Stop the NC bear hunting 21st Apr 22.

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest

Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
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4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration and time today on this painful subject.

Natasha

Sent from my iPhone

Burgos, Alexander N

From: Rules, Oah
Sent: Monday, April 18, 2022 1:59 PM
To: Burgos, Alexander N
Subject: FW: [External] Bear Sanctuary vs Bear Management Areas

From: Robin Davis <1jaxmom@gmail.com>
Sent: Wednesday, April 13, 2022 10:23 PM
To: Rules, Oah <oah.rules@oah.nc.gov>
Subject: [External] Bear Sanctuary vs Bear Management Areas

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N.C. Rules Review Commission
[1711 New Hope Church Rd.](#)
[Raleigh, NC 27609](#)

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted a rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas." **This is not clear and is ambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Further investigation into these "human bear conflicts" has shown no quantifiable data to back up these claims. Additionally, the perception of negative bear-human encounters has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is confusing instead of clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts. This is an example of proper and successful management of the bear population in action.

2. Hunting does not reduce bear-human conflicts; in contrast education is proven to stem perceived negative encounters.

3. Science and data show that bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including hunters. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The proposed bear hunting season is a popular time for tourism (leaf season) and has the potential for tragic outcomes when out-of-town guests hike into hunting areas.

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas creating a negative economic impact to these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your time and consideration of the protection of all of the resources of our beautiful state.

--

Robin Davis

1jaxmom@gmail.com

Phone 336-508-6820

Greensboro, NC

"I want people to care,
to fall in love,
to take action."

~Joel Sartore



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Burgos, Alexander N

From: Rules, Oah
Sent: Monday, April 18, 2022 2:01 PM
To: Burgos, Alexander N
Subject: FW: [External] [15A NCAC 10D .0106] Bear Sanctuaries

From: sdoull <sdoull@aol.com>
Sent: Wednesday, April 13, 2022 8:13 PM
To: Rules, Oah <oah.rules@oah.nc.gov>
Cc: McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] [15A NCAC 10D .0106] Bear Sanctuaries

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Sarah F. Doull
P.O.Box 906
Lafayette, CA 94549

4/13/22

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is **not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.
2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to

raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.
3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.
Sarah F. Doull

Burgos, Alexander N

From: Rules, Oah
Sent: Monday, April 18, 2022 2:00 PM
To: Burgos, Alexander N
Subject: FW: [External] Bear Sanctuary

From: Helen Moore <hmpanther@me.com>
Sent: Wednesday, April 13, 2022 9:18 PM
To: Rules, Oah <oah.rules@oah.nc.gov>
Subject: [External] Bear Sanctuary

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April 13, 2022

N.C. Rules Review Commission

1711 New Hope Church Rd.

Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule be subject to a delayed effective date as set out in that same provision.

Was the rule clear and unambiguous? No! The rule does not stipulate how many permits may be issued in each area or what limits will be placed on them. What they presented were concepts, rules that will be different for each of the three areas but not delineated in the new rule. That is unacceptable. How can you approve a rule without knowing what it is?

Is it reasonably necessary to implement the rule? NO! One of the reasons specified for the hunt was the increased number of human-bear conflicts in the sanctuaries. Since 2020 when two bear-proof lockers were installed in Panthertown Valley, there have been NO human-bear conflicts. With the 3 additional vaults planned for installation this year, conflicts should not be an issue. Instituting BearWise measures in and around the sanctuaries can also help mitigate human-bear conflicts.

The commission claims there are too many bears, but they admit the sanctuaries have not reached their biological carrying capacity. I know many people who hike frequently in the valley, and none has ever seen a bear. Bears naturally regulate the number of offspring according to the availability of food. There is no need to kill them.

The Commission also says there aren't enough places to hunt bears, yet the 2020 bear harvest was the second largest in NC's record.

Another reason the Wildlife Commission gave for opening the area to hunting was to provide more places to hunt bears. That is not what actual bear hunters want. They want to preserve places where the bears are protected in order to keep a healthy population.

86% of comments were opposed to this rule. Most hunters are opposed to this (100% of hunters at a recent public hearing). There is very little public support for this

For all these reasons, the rule cannot be deemed "reasonably necessary to implement."

Education and mitigation are what's needed, not killing.

In addition, there could be an economic impact if people stop coming to the sanctuary areas for hiking, camping, picnicking, photography, rock climbing, fishing, etc. They certainly won't feel comfortable with packs of dogs running around and hunters shooting off their guns. Hunting dogs can be aggressive and dangerous. People won't want to share the trail with them. Considering that people come here from distant states and spend money on hotels, meals, etc., the economic impact could be great.

Therefore, I respectfully request the above rules be reviewed and not approved.

Helen Moore

140 Kenridge Lane

Highlands NC

hmpanther@me.com

Burgos, Alexander N

From: Rules, Oah
Sent: Monday, April 18, 2022 2:02 PM
To: Burgos, Alexander N
Subject: FW: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries
Attachments: BearLetter.pdf

From: Grace Scalzo <gscalzo24@gmail.com>
Sent: Wednesday, April 13, 2022 7:47 PM
To: Rules, Oah <oah.rules@oah.nc.gov>
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Grace Scalzo
216 Fox Hill
Spring Branch, TX 78070

April 13, 2022

N.C. Rules Review Commission 1711 New Hope Church Rd. Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" **is not clear and unambiguous for the following reasons;**

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years,

the U.S. Forest Service (USFS) has not received any complaints regarding bear- human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a

single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Grace Scalzo

--

Grace Scalzo

www.gracescalzophotography.com

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Burgos, Alexander N

From: Rules, Oah
Sent: Monday, April 18, 2022 2:04 PM
To: Burgos, Alexander N
Subject: FW: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

-----Original Message-----

From: gzia@mail.com <gzia@mail.com>
Sent: Wednesday, April 13, 2022 5:07 PM
To: Rules, Oah <oah.rules@oah.nc.gov>
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons; 1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above); 1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy; 1. The Pisgah, Panthertown-Bonas Defeat and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

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Burgos, Alexander N

From: Rules, Oah
Sent: Monday, April 18, 2022 1:51 PM
To: Burgos, Alexander N
Subject: FW: [External] [15A NCAC 10D .1061] Bear

From: Tracey Varga <traceyvarga@msn.com>
Sent: Thursday, April 14, 2022 3:35 PM
To: Rules, Oah <oah.rules@oah.nc.gov>; McGhee, Dana <dana.McGhee@oah.nc.gov>
Subject: [External] [15A NCAC 10D .1061] Bear

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Dear Members of the Commission,

As a 25+ year resident of North Carolina and registered voter I would like to request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3.

I also request that the rule(s) be subject to a delayed effective date as set out in the same provision.

The North Carolina Wildlife Resources Commission recently proposed and adopted a rule that allows bear hunting in 3 Western NC Bear Sanctuaries (Pisgah, Panthertown-Bonas Defeat and Standing Indian Bear). A change in the “ designated Bear Sanctuaries “ to “ designated Bear Management Areas” would allow bear hunting and hunting with dogs.

The NCWRC’s reasoning for this rule to open up hunting was due to an increase in bear-human conflicts. Please note that it important to be aware that there is no documented scientific evidence to support that hunting reduces bear-human conflicts and actually the opposite has been proven. Bear-proof food lockers that were introduced in 2020 has resolved bear-human conflicts and over the past 2 years the USFS has not received any complaints regarding bear-human conflicts and more food lockers are in the plans to be installed as a continued preventative measure.

The new rule has not been clearly defined by the NCWRC as far as number of permits issued to hunters, cost of permits, number of bears allowed to kill.

The claims by the NCWRC that the North Carolina bear population is growing and needs to be managed does not take into account that bears regulate their own populations through a process called delayed implantation, which prevents bears from populating beyond their environmental carrying capacity.

Taking all these factors into account, as well as noting the public response at the recent NCWRC meeting on April 5, 2022 held at the Tri- County Community College when State Representative Karl Gillepsie asked everyone in attendance to raise their hands if they supported the rule. Not one person (including hunters that the NCWRC claims have been pressuring them to open up hunting in the Sanctuaries) raised their hand.

Please consider the negative impact this rule will have on the state’s economy, tourism, businesses, outdoor recreation and the risks bear hunting (especially with dogs) can bring to tourists and residents. I personally called (spoke with or left messages) all the NCWR Commissioners on April 4 to voice my concerns and opposition to this new rule “ designated Bear Management “ involving 3 cherished North Carolina Bear Sanctuaries. I request that [15A NCAC 10D. 1061] not be approved by the Rules Review Commission. Please save the bears, their cubs and their pristine habitat.

Thank you for your consideration.

Feel free to contact me if you have any questions and/or comments.

Sincerely,
Tracey Varga

124 Walnut Street #503
Wilmington, NC 28401
910-232-8151

Sent from my iPad

Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

Burgos, Alexander N

From: Rules, Oah
Sent: Monday, April 18, 2022 1:48 PM
To: Burgos, Alexander N
Subject: FW: [External] [15A NCAC 10D .0106] Bear Sanctuaries

From: ANGELICA COLMENARES <angelicaun@hotmail.com>
Sent: Friday, April 15, 2022 1:39 AM
To: McGhee, Dana <dana.McGhee@oah.nc.gov>
Cc: Rules, Oah <oah.rules@oah.nc.gov>
Subject: [External] [15A NCAC 10D .0106] Bear Sanctuaries

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

My entire life I have enjoyed watching wildlife across the world, however recently I have developed intense admiration for USA bears. My goal is to visit every bear state in the upcoming years, and North Carolina is definitely in my list. In order to continue with my journey to enjoy your amazing bear population, I respectfully request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries, along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and is ambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention

that the USFS request was made in 2018, and the request was solely for Panthertown. Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.
3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.
6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.
7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration. I hope that not only me, but future generations can enjoy the magnificence of American Bears.

Angelica Colmenares, M.D, M.P.H

Spring, Texas

Sent from my iPhone

Burgos, Alexander N

From: Cindy Covill <cindycovillinteriors@gmail.com>
Sent: Monday, April 11, 2022 9:42 AM
To: rrc.comments; Rules, Oah
Cc: McGhee, Dana
Subject: [External] [15A NCAC 10D .0106] Bear Sanctuaries

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Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
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asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

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The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

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6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Cindy Covill

Burgos, Alexander N

From: marketqn@verizon.net
Sent: Monday, April 11, 2022 8:04 AM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Naomi M Weisman
7318 Greentree Road
Bethesda, MD 20817

April 11, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is **not clear and unambiguous for the following reasons;**

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillespie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Naomi M Weisman

A handwritten signature in black ink, appearing to read 'Naomi M Weisman', followed by a long horizontal line extending to the right.

Burgos, Alexander N

From: Christine Arroyo <christinearroyo@gmail.com>
Sent: Monday, April 11, 2022 7:15 AM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Christine Arroyo
281 Tammany Hall Rd, Carmel, NY 10512

April 10, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Christine Arroyo

--
Christine Arroyo
310 429 8055

Burgos, Alexander N

From: Ted Hume <baseliner2010@hotmail.com>
Sent: Monday, April 11, 2022 6:59 AM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Bear sanctuaries.

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N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

The Hume family.

Burgos, Alexander N

From: Deborah Palmer <deborahjpalmer@hotmail.co.uk>
Sent: Monday, April 11, 2022 6:48 AM
To: rrc.comments
Cc: Rules, Oah
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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D Palmer
The Shambling Notley Green, CM777GS

10 April 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

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Thank you for your consideration.

Deborah Palmer

Burgos, Alexander N

From: Michelle Dennis <michellebdennis@yahoo.com>
Sent: Monday, April 11, 2022 6:13 AM
To: rrc.comments; Rules, Oah
Cc: McGhee, Dana
Subject: [External] [15A NCAC 10D .0106] Bear Sanctuaries

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Michelle Dennis

4805 Avondale Court

April 11, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

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5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

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7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Michelle Dennis

Burgos, Alexander N

From: mandy mcavoy <mandymcavoy1@hotmail.co.uk>
Sent: Monday, April 11, 2022 5:25 AM
To: rrc.comments
Subject: [External] NC rules

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Mandy McAvoy

18 Hornbeam Crescent
8QA
Kingdom

Harrogate
Yorkshire.

United Kingdom
HG2

11th April 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is not clear and unambiguous for the following reasons;

1. The NCWRC's basis for the rule was that the U.S. Forest Service (USFS) requested that they open up the sanctuaries to hunting due to increased bear-human conflicts. It is important to note that there is no scientific evidence to support claims that hunting reduces bear-human conflicts. The opposite has been proven. The NCWRC also failed to mention that the USFS request was made in 2018, and the request was solely for Panthertown.

Additionally, the problem with bear-human conflicts has since been subsequently resolved by introducing bear-proof food lockers in 2020. Over the past two years, the U.S. Forest Service (USFS) has not received any complaints regarding bear-human conflicts, and there are plans to install more food lockers as a proactive measure in preventing future bear-human conflicts.

2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.

4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.

2. Hunting does not reduce bear-human conflicts.

3. Bears manage their own populations through delayed implantation.

4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.

2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.

3. The bear hunting season is a popular time for tourism (leaf season).

4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.

5. Under North Carolina law, dogs "being used in a lawful hunt" are exempt from rules that otherwise require owners to take steps to prevent their animal from harming a person or another animal. This rule endangers the public, pets, and private property owners. Tourists and residents will think twice before bringing their families to a place where they can be potentially shot or attacked by hunting dogs. Learning that hunting dogs/dog owners are exempt from laws that protect people and their pets will only further deter people from visiting these areas.

6. This rule will negatively affect businesses located around the sanctuaries impacting the livelihood of local residents. The more than 45,000 small businesses across North Carolina heavily rely on tourism, everything from lodging and dining to transportation, recreation, and retail.

7. According to the Department of Natural and Cultural Resources data, 22.8 million visitors entered the system's 41 parks, recreation areas, and natural areas in 2021. Pisgah receives 5.5 million annual visitors and Panthertown sees more than 35,000 visitors a year.

For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Mandy McAvoy

Sent from my iPhone

Burgos, Alexander N

From: Angharad Davies (HEIW) <Angharad.Davies2@wales.nhs.uk>
Sent: Monday, April 11, 2022 4:58 AM
To: rrc.comments; Rules, Oah; McGhee, Dana
Subject: [External] Re: [15A NCAC 10D .0106] Bear Sanctuaries

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Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

The North Carolina Wildlife Resources Commission's recently adopted rule that allows bear hunting and hunting with dogs in the Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries along with a change in the term "designated bear sanctuaries to "designated bear management areas" is **not clear and unambiguous for the following reasons;**

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.
3. The NCWRC also stated that hunters pressured them to open up the sanctuaries for more hunting opportunities. However, the North Carolina Wildlife Resources Commission met with stakeholders on April 5, 2022, at the Tri-County Community College in the McSwain Building Lecture Hall to discuss the recently adopted rule. The entire room was full of hunters and non-hunters. State Representative Karl Gillepsie was in attendance. He asked everyone in favor of the rule to raise their hands. Not a single person raised their hand, including the hunters that the NCWRC alleges have been pressuring them to open the three bear sanctuaries to hunting.
4. The NCWRC has not clearly defined the details of the rule. There is no definitive answer to the number of permits to be issued to hunters, the cost of permits, or the number of bears allowed to be killed. They have adopted a rule that is not clearly defined.

The rule is not reasonably necessary because of the following (also see above);

1. Since the bear-proof food lockers were installed, there are no longer bear-human conflicts occurring. There have been no bear-human conflicts for the past two years, and more food lockers are being installed to prevent future conflicts.
2. Hunting does not reduce bear-human conflicts.
3. Bears manage their own populations through delayed implantation.
4. The majority of the NCWRC's stakeholders oppose opening the sanctuaries to hunting, including the hunters they claim have been pressuring them. During the NCWRC's public comment period, 86% of comments were opposed to the rule.

The rule will have a negative impact on the state's economy (economic impact);

1. The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries are revered destinations for residents and tourists alike. People travel from all over the world to enjoy the serene, peaceful environment and the prospect of seeing bears.
2. The tourism and outdoor recreation industries are significant contributors to North Carolina's economy.
3. The bear hunting season is a popular time for tourism (leaf season).
4. Bear hunting, especially bear hunting with dogs, puts tourists and residents in danger of being accidentally shot or attacked by hunting dogs, which has previously happened in the state when a woman and her two dogs were viciously attacked by hunting dogs while camping.
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For all of the reasons listed above, I request that [15A NCAC 10D .0106] Bear Sanctuaries not be approved by the Rules Review Commission.

Thank you for your consideration.

Angharad Davies

Burgos, Alexander N

From: Danial Asadolahi <dan.asad@gmail.com>
Sent: Monday, April 11, 2022 2:44 AM
To: rrc.comments; Rules, Oah
Cc: McGhee, Dana
Subject: [External] [15A NCAC 10D .0106] Bear Sanctuaries

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Members of the Commission:

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2. The NCWRC also claims that the bear population is growing and needs to be managed. Bears regulate their own populations through a process called delayed implantation. This process prevents bears from populating beyond their environmental carrying capacity.

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Thank you for your consideration.

Danial Asadolahi

Burgos, Alexander N

From: Mohan Srinivasan <mohan.srinivasan@gmail.com>
Sent: Monday, April 11, 2022 1:54 AM
To: rrc.comments; Rules, Oah
Cc: McGhee, Dana
Subject: [External] Continued protection is needed for Bears in The Pisgah, Panthertown-Bonas Defeat, and Standing Indian Bear Sanctuaries...

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Mohan Srinivasan
99 Kellogg Way
Santa Clara
CA 95051

April 10 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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Thank you for your consideration.

Mohan Srinivasan

To

Office of Administrative Hearings
1711 New Hope Church Rd.
Raleigh, NC 27609.

And

Dana McGhee

The Agency's Rulemaking Coordinator

From:

Margaret Samuel

20 Bay Street, Suite 1100

Toronto, Ontario

M5J 2N8

April 11, 2022

N.C. Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Re: [15A NCAC 10D .0106] Bear Sanctuaries

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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Thank you for your consideration.

Margaret Samuel

