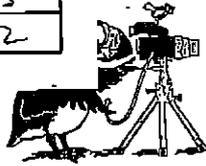


* Fax Note	7671	Date	2-13-09	# of pages	2
AG - Board Support		From	Julie Jessen		
Co./Dept.	Co.				
Phone #	Phone # 644-2075				
Fax # 465-6094	Fax # 644-2022				



**Alaska Society of Outdoor & Nature Photographers**  
**PO Box 231052, Anchorage, AK 99523**  
**[www.asonp.org](http://www.asonp.org) [info@asonp.org](mailto:info@asonp.org)**

February 10, 2009, 2009

To: Alaska Board of Game

**In Support of Proposals # 42, 43, 44, and 45**

*In 1985, the Board of Game decided to close brown bear hunting in the McNeil River area. At that time the Board determined that bear protection and viewing in this area "is the highest and best use of bears on this small island of land."*

On behalf of the more than 100 resident Alaskan members of the Alaska Society of Outdoor & Nature Photographers (ASONP), we respectfully request the Alaska Board of Game to **limit or close provisions for hunting brown bear in Unit 9C lands adjacent Katmai National Park**. ASONP provided similar testimony opposing brown bear sport hunting in areas adjacent to Katmai National Preserve and the McNeil River State Game Refuge at the 2005 and 2007 Board of Game meetings.

ASONP members range from the first-time photographer to professional photographers who travel throughout the world seeking unique photo opportunities. Our members represent the broad diversity of Alaskans who hunt, fish, recreate, and generally enjoy the outdoors. Some of our members also provide services to photographers and other visitors from around the world who come to see the brown bear in the Katmai National Park and adjoining McNeil River area.

Wildlife viewing is a major aspect of Alaska's tourism economy, and, of all Alaska's magnificent wildlife species, the brown bear is perhaps the most symbolic of our great State. Thousands of visitors travel to Alaska each year to see brown bears in their natural setting. According to Steve Colt, an economist with the Institute for Social and Economic Research, wildlife viewing by Alaska residents alone accounts for more than 3,600 direct Alaska jobs (low estimate) with \$37 million of net economic value. Mr. Colt continues, "...it is probably reasonable to attribute about 200 full time Alaska jobs to ecosystem-dependent photography and media activity that is not already accounted for in this analysis..."<sup>1</sup> The benefit of wildlife viewing to Alaskan jobs and net economic value increases exponentially when visitor trips are added to the equation. The bears in and around Unit 9C play a significant role in these figures.

<sup>1</sup> Colt, Steven. The Economic Importance of Healthy Alaska Ecosystems. Anchorage, Alaska: Institute for Social and Economic Research, 2001 (pages 9 and 39).

Public Comment # 1

RECEIVED TIME FEB. 13. 10:37AM

In 1967, the State of Alaska created the McNeil River State Game Sanctuary and Refuge to protect the world's largest concentration of wild brown bears (ADF&G web site). Bears in this area travel widely in search of food, however, and move into areas where hunting is already allowed. Increasing harvest levels in Katmai National Preserve and Unit 9C are decreasing the bear population in the McNeil River McNeil and Katmai National Park protected areas. As a well-viewed population, the brown bears in this area are habituated to humans. Hunting a bear that is accustomed to being in very close proximity to photographers, fisherman, and others who pose no threat does not measure up to the fair chase concept prized by Alaskans—hunters and non-hunters alike.

Alaska's brown bears are a valuable resource that belongs to all Alaskans. We urge the Board of Game to consider its mandate to provide for the management of our common-property wildlife resources for all Alaskans.

In closing, ASONP respectfully requests the Board of Game approve the primary concept of Proposals 42 through 45 that call to limit hunting of brown bears on State lands in Unit 9C.

Sincerely,

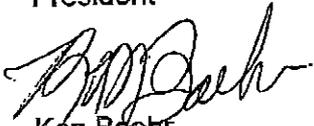
The Board of the Alaska Society of Outdoor & Nature Photographers



Julie Jessen  
President



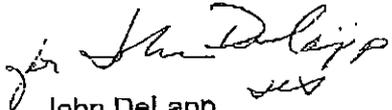
Amber Johnson



Ken Baehr  
Vice President



Georgia Bennett

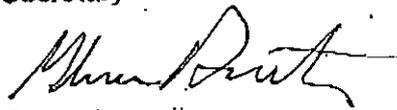


John DeLapp  
Treasurer

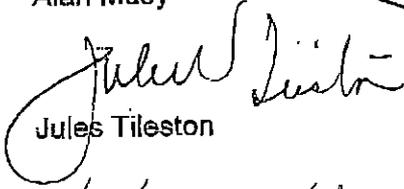


Alan Musy

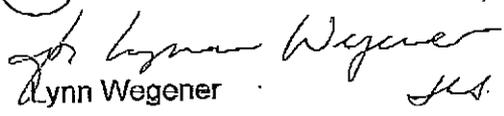
Robin Brandt  
Secretary



Glenn Aronwits



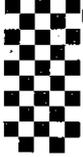
Jules Tileston



Lynn Wegener

Cathy Hart

Public Comment # 1



February 12, 2009

Attn: Sherry Wright  
Southcentral Region, ADF&G  
333 Raspberry Road  
Anchorage, AK 99518-1599

Fax: (907) 267-2489

Fax: (907) 465-6094

Subject: Comments on the 2009 Alaska Board of Game Proposals

We are both professionals who have worked many years for resource agencies and who strongly believe in wildlife conservation and science-based wildlife management. This letter is to express our opinions about some of the proposals upon which the Board of Game will be voting at its March 2009 Anchorage meeting.

We feel that many of the proposals are excessive, unscientific and are also unjustified attempts to benefit hunting interests and continue the state's extreme approach to predator control. And the results of these actions will have negative, lasting consequences for Alaska's wildlife and for future generations of Alaskans.

We urge you to VOTE NO on:

\* Proposals 76, 130, 131 and 135, which seek to increase brown bear hunting in Units 7, 13 and 15.

\* Proposals 49, 50, 68 and 69, which seek to create a new predator control program aimed to reduce brown bears and wolves in Units 9 and 17. This proposal is based solely upon anecdotal evidence, not research!

\* Proposal 75, which would allow brown bears in Unit 13 to be taken over bait stations, and also on Proposals 166 and 171, which would modify the predator control program in Unit 16B to allow baiting of brown and black bears all summer and allow the use of snares and traps to take black bears.

The extreme means of harvest in this Unit has already been shown to be ineffective -- this should be revoked, not further liberalized. Bear baiting during the summer months will only compound the problem of nuisance bears by habituating bears to human food and further compromise public safety and private property.

\* Proposals 189 and 192, which would allow helicopters to transport hunters to the Unit 16B predator control area, authorize the baiting of bears in the summer and, for the first time ever, permit private citizens to use helicopters to access remote areas in order to kill wolves and bears.

\* Proposal 168, which would allow same-day aerial hunting of black bears in Unit 16 and allow helicopters to be used to transport hunters including, for the first time ever, out-of-state hunters to remote locations, without imposing any bag limits! This proposal also, for the first time, seeks to allow youth to participate in predator control programs. We strongly object to both of these measures. The state predator control programs require all individuals who participate to sign a legally binding agreement, and minors cannot sign such agreements. We strongly object to recruitment of youth to help carry out the state's current objectionable, controversial program!

\* Proposal 170, which would allow trapping and snaring of bears in Unit 16 under a predator control permit. The public has always opposed snaring of bears and this practice has long been prohibited in Alaska with good reason. Steel leg-hold traps large enough to hold bears are a danger to people, pets and other non-target wildlife like caribou and moose. In addition, this capture method raises serious ethical concerns. Bears wounded in snares or traps could escape, resulting in a prolonged, inhumane amount of suffering. Please reject this proposal!

\* Proposals 125 and 128, which seek to create predator control programs in Units 7 and 15 and allow black bear hides and skulls to be sold, which would only promote the illegal harvest of bears for profit and go against the recommendations of State Wildlife Troopers. In addition, allowing the sale of bear parts has not been effective in increasing black bear harvest, as evidenced in Unit 15.

\* Proposals 132 and 153, which would threaten Kenai Peninsula brown bears by eliminating their status as a species of special concern.

\* Proposal 237, which would allow brown and black bears, including sows and cubs, to be killed using snares and same-day airborne hunting in Unit 20E. This proposal flies in the face of decades of tradition where cubs and mother bears have been protected from hunting and will undoubtedly be unpopular with the majority of Alaskans. We should continue to protect bear cubs and sows in Alaska. In addition, snares are indiscriminate and can catch many non-targeted species, including moose, and if a cub gets caught in these traps, the danger to the public posed by its mother could be severe. This proposal would also establish a working group to recommend additional actions to further reduce bears in this area. If a working group is established, we strongly request that the Board will include representatives from the scientific and conservation communities.

\* Proposal 239, proposed by the Alaska Department of Fish and Game (ADFG), which would establish a new predator control program targeting 80% of the wolves in 8,000 square miles of Unit 21E (Proposal 239) -- even though they have no reliable data on how many wolves are in the area! How can the ADF&G claim that predator control is justified or assert that state personnel will not shoot the remaining 20% of the wolves if they don't know how many wolves are there to begin with?

\* Proposals 235 and 236, which would extend the predator control program in Unit 19A by six years and in Unit 19D (East) by five years, respectively. Neither program has ever been scientifically justified, and if the Board votes to continue them, it should conduct the studies necessary to prove that wolf predation is the main limiting factor for moose.

Proposal 190, which the ADF&G has put forward to allow state personnel to use carbon monoxide bombs to kill wolf pups in their dens. As you know, denning in general is incredibly unpopular with Alaskans -- using poisonous gas in order to conduct denning and elimination of wolf pups will be met with public outrage.

On the positive side, we would like to express support for several proposals which will have positive impact on Alaska wildlife and the wildlife-viewing public. These include proposals on the table to end lynx and wolverine trapping in Chugach State Park (Proposals 22, 24, 27, 28, respectively), other restrictions on trapping in the Chugach State Park (Proposals 20, 21, 23, 25, 26), and decrease the harvest of brown bears in Katmai Lake Clark, Wrangell St. Elias and Denali National Preserves (Proposals 44, 45, 51, 77, 78 and 174). We also support Proposal 29 and 30 to modify the bag limit for black bear and Proposal 31, to delay opening of the black bear season as ADF&G has strongly advised that harvest of bears in this area has quadrupled and that killing of female bears is now exceeding 40%.

We also strongly support closing the brown bear hunting season in McNeil River. For years, this location has been a national and international attraction for bear viewing by thousands of tourists. However, McNeil River bear numbers have now already been seriously reduced by hunting pressure (Proposal 43).

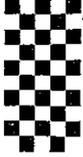
We also support Proposal 224, which calls for the Board of Game to continue to protect the rare white-colored bears. These beautiful animals are of spiritual significance to many Alaskans and provide viewing benefits to both to Alaskans and tourists from elsewhere.

Please support the majority of Alaskans who care about responsible, science-based wildlife management as you review, consider and vote on these important proposals.

Sincerely yours,



Dr. Walter and Valenne Glooschenko  
6017 Doncaster Dr.  
Anchorage, Alaska 99504



12 February 2009

ATTN: BOG COMMENTS

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

Ladies and Gentlemen:

This letter is written to support your Proposal 43, closing brown bear in the Funnel Creek, Moraine Creek, and Battle Creek drainage areas.

I have been a bear admirer and activist for some years, and there is no way I could tell you I think that hunting bears is a valid human activity in the 21<sup>st</sup> century. I know from my own observation that these are intelligent and sensitive animals. Given a better world, they deserve human admiration, not human predation. People often ridicule bears or express extreme fear of them; if they turned around and took a second look, they might see humans as by far the more ridiculous or frightening.

Under no circumstances will I ever feel that the sale of licenses is an ethical practice. I understand that it is lucrative, but it also reduces the bears to the level of fodder and demeans *us* as human beings. A bear *never* deserves to be "harvested".

I realize that my views don't necessarily correspond with much of the Alaska mindset, still I ask you at the very least to pass Proposal 43, in support of those bears lucky enough to reside in Unit 9C, where they can attract new tourism to your state and where they will remain visible to those of us who care enough to want to protect them.

Please pass Proposal 43.

My regards,

Diane Brown  
702-139 Clarence Street  
Victoria, BC, Canada  
V8V 2J1  
(250) 382-1445  
diane.brown@shaw.ca

Alaska Departement of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907 465 6094

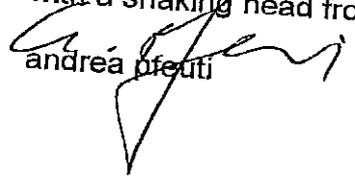
**Re:** In Support of PROPOSAL 43 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Close brown bear hunting in a portion of Unit 9C as follows: Funnel Creek, Moraine Creek, and Battle Creek

to whom It may concern

what have to happen to change peoples mind? how longer we play good or even worse – we think we are godlike..

its out of question you have not only to limit – you have to STOP the bear hunting! often I wish they would have a gun..but im sure they would't act that stuped like human beeing do..

with a shaking head from switzerland

  
andrea preuti

Public Comment # 4



David Rand  
17800 Spain Drive  
Anchorage AK 99516

February 13, 2009  
Attn: BOG Comments  
Alaska Dept. of fish and Game  
Boards Support Section  
P.O. 115526  
Juneau AK 99811-5526  
Transmitted via fax: 907 465 6094

Re: Game management comments for unit 14c

To the Alaska Board of Game:

Please consider the following comments in your deliberations regarding game management in unit 14c.

PROPOSAL 1 - 5 AAC 85.020 Hunting seasons and bag limits for brown bear.

Support

There are too many brown bears in Anchorage. They are a threat to the safety of the people that use the trails of Anchorage. I don't believe that they have traditionally existed in such large numbers. Anecdotal evidence from long-standing residents reflects that the brown bear population has grown over the years. The existence of so many bears has also caused the Anchorage School District to prohibit students from using the Service High trails during portions of the year. I myself experienced an up-close, aggressive charge from a brown bear this fall near my home on the south hillside of Anchorage. I was fortunate. However others this summer weren't as fortunate and we will only continue to have more confrontations, injuries and eventually deaths if more isn't done to reduce the number of brown bears in Anchorage. This proposal is an appropriate and reasonable step in reducing the population of brown bears to provide a safer and more useable environment.

PROPOSAL 2 - 5 AAC 85.20 Hunting seasons and bag limits for brown bear.

Conditional Support

This proposal is a minor improvement over current regulations; however proposal 1 is preferred as it takes a more aggressive step in addressing this issue.

Public Comment # 5

PROPOSAL 3- 5 AAC 85.20 Hunting seasons and bag limits for brown bear.

Conditional Support

This proposal is a minor improvement over current regulations; however the proposal is limited to the Eklutna lake area. Proposal 1 is preferred as it takes a more aggressive step in addressing this issue.

PROPOSAL 5- 5 AAC 85.045 Hunting seasons and bag limits for moose.

Support

I believe that the prevalence of moose in the Anchorage bowl has contributed to brown bear problem in Anchorage. Rick Sinnott speculated that the brown bear that charged me this fall was defending a nearby moose kill. I believe that reducing the moose population will remove a significant food source for brown bears in Anchorage. This proposal, by reducing the moose population, will also help reduce the brown bear population. I support this proposal as part of a needed effort in reducing the overabundance of moose and brown bears in Anchorage.

PROPOSAL 8- 5 AAC 85.045 Hunting seasons and bag limits for moose.

Conditional Support

Proposal 5 is preferred over this proposal as proposal 5 mandates sufficient permits to actually make a significant progress in controlling moose population.

PROPOSAL 9- 5 AAC 85.045 Hunting seasons and bag limits for moose.

Support

This proposal, by reducing the moose population, will also help reduce the brown bear population. I support this proposal as part of a needed effort in reducing the overabundance of moose and brown bears in Anchorage.

PROPOSAL 10- 5 AAC 85.045 Hunting seasons and bag limits for moose.

Support

This proposal, by reducing the moose population, will also help reduce the brown bear population. I support this proposal as part of a needed effort in reducing the overabundance of moose and brown bears in Anchorage.

PROPOSAL 11- 5 AAC 85.045 Hunting seasons and bag limits for moose.

Support

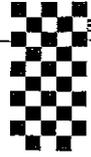
This proposal, by reducing the moose population, will also help reduce the brown bear population. I support this proposal as part of a needed effort in reducing the overabundance of moose and brown bears in Anchorage.

Thank you for your consideration.

Sincerely,



David W. Rand



Attn: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811

Fellow Alaskans,

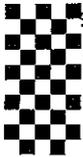
In short, I am writing to urge each of the seven board members to vote in favor of Proposal 28.

First, let me point out that I am not opposed to taking the lives of wildlife, as I myself am a hunter of deer, moose. However, I believe that The Board of Game's previous decision to allow the trapping of wolverine in Chugach State Park is a mistake on multiple fronts, and should be reversed.

- The current trapping season kills more dogs than wolverines. At the close of last season, six dogs had been trapped and only two wolverines. The disparity here is obvious. There is no requirement that dogs be on a leash in state parks. Even if such a rule existed, it would be naïve to believe that allowing trapping in such a popular and frequently used park, next to Alaska's densest population would not result in exactly this...peoples beloved pets being killed more frequently than wolverines. Or was that the original goal?
- The Board of Game should heed the professional wildlife biologists of Alaska Department of Fish and Game, who openly opposed the original measure on a scientific basis. I have interacted professionally with Mr. Sinnott multiple times and have faith and respect for his objective and scientific opinion. Mr. Sinnott predicted that more dogs would be trapped than wolverines and he was right. The State employs Mr. Sinnott for his professional expertise work and should heed it.
- For years I have tried to track and observe a wolverine in the wild. A live wolverine. I am 34 now and may never see one. But one thing is for sure: With only 10-12 wolverines estimated in the game management area, the current trapping policy only decreases the odds of me achieving my goal, all so that somebody can sell a hide or selfishly keep it for themselves on their mantle. The rest of us Alaskans get nothing.

Thank you for your consideration and again, I urge you to vote in favor of Proposal 28.

Hiram Henry  
2429 East 20<sup>th</sup> Ave  
Anchorage, AK 99508  
(907) 947-7833



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

Submitted by: Rod Schuh

**Proposal 48: OPPOSE**

Statistics from the Alaska Dept. of Fish and Game (attached) dating back to 1993 show that applicant numbers and the success ratios between nonresidents and residents have been relatively stable since commercial operations started on Unimak Island. The only notable variations (although minor) between resident and nonresident applicants has been since 2006. This difference has not been due to an increase in nonresident applicants, but in fact a reduction in resident applicants. Consideration needs to be made that some percentage of nonresident applicants are first or second degree kindred to resident applicants and are not associated with commercial operations. Therefore the actual impact of commercial operations is less than the comparison between resident and nonresident applicants as shown in the ADF&G statistics.

Limiting the amount of nonresidents that can apply for a limited draw type hunt is ridiculous, and in my opinion unconstitutional. How can you tell one applicant that he can apply for a particular limited draw hunt and not another? This holds true for residents as well as nonresidents.

Considering the ADF&G statistics, it is not apparent that big box application services, etc., have flooded the application pool in recent years as the proposal submitter claims.

Having a required guide-client agreement and being registered in Unit 10 prior to application submittal is not unreasonable, and may prevent any future influx of applicants as the submitter is concerned about.

It appears that this proposal is structured to even the playing field between operators with good business practices and with ones with poor business practices. I do not believe the board should, or would want, to take a position on business practices and the relative success of one to the other.

**Unimak Island Brown Bear Hunt Permits - DB375 & DB376**

**Applicants**

Year	Unk Applicant	%	NonRes App	%	Res App	%	Total Applicants
1993	9	3.7	11	4.5	226	91.9	246
1994	5	1.8	16	5.8	256	92.4	277
1995	13	3.4	72	18.6	303	78.1	388
1996	13	2.5	191	37.3	308	60.2	512
1997	0	0.0	128	38.8	202	61.2	330
1998	0	0.0	163	38.7	258	61.3	421
1999	0	0.0	210	40.8	305	69.2	516
2000	0	0.0	246	40.5	382	59.5	608
2001	0	0.0	267	43.8	345	58.4	612
2002	0	0.0	276	42.0	381	58.0	657
2003	0	0.0	260	42.8	348	57.2	608
2004	0	0.0	230	42.0	318	58.0	548
2005	0	0.0	286	46.5	329	53.5	616
2006	0	0.0	288	51.2	273	48.8	563
2007	0	0.0	289	56.0	227	44.0	516
2008	0	0.0	216	62.0	199	48.0	415
<b>Average Since 2000</b>			<b>262.0</b>	<b>46.3</b>	<b>309.3</b>	<b>53.7</b>	<b>571.3</b>
<b>3 year average</b>			<b>264.3</b>	<b>53.1</b>	<b>233.7</b>	<b>46.8</b>	<b>498.0</b>

**Permit Holders**

Year	Unk Permits	%	NonRes Permits	%	Res Permits	%	Total Permits Is
1993	0	0.0	3	18.8	13	81.3	16
1994	1	6.7	1	6.7	13	86.7	15
1995	1	6.7	6	33.3	9	60.0	15
1996	0	0.0	6	40.0	9	60.0	15
1997	0	0.0	5	33.3	10	66.7	15
1998	0	0.0	8	53.3	7	46.7	15
1999	0	0.0	7	46.7	8	53.3	15
2000	0	0.0	5	31.3	11	68.8	16
2001	0	0.0	8	53.3	7	46.7	15
2002	0	0.0	6	40.0	9	60.0	16
2003	0	0.0	5	33.3	10	66.7	15
2004	0	0.0	7	46.7	8	53.3	15
2005	0	0.0	6	40.0	9	60.0	15
2006	0	0.0	5	33.3	10	66.7	15
2007	0	0.0	9	60.0	6	40.0	15
2008	0	0.0	5	33.3	10	66.7	15
<b>Average Since 2000</b>		<b>0.0</b>	<b>6.2</b>	<b>41.3</b>	<b>8.9</b>	<b>58.8</b>	<b>16.1</b>
<b>3 year average</b>			<b>6.3</b>	<b>42.2</b>	<b>8.7</b>	<b>57.8</b>	<b>16.0</b>

PROPOSAL 43 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Close brown bear

hunting in a portion of Unit 9C as follows:  
Funnel Creek, Moraine Creek, and Battle Creek

#### SUPPORT

The only reason I go out to Alaska and guide my friends to go out to Alaska is because of the bears. People visit Katmai and McNeil specifically because of the concentration of these magnificent animals of which you cannot view in so much detail anywhere else on Earth. These bears are acclimated to photographers and live a peaceful existence with a healthy dose of trust to humans. I feel it is against everything this area has to offer to even consider hunting here. I look forward to sending people out and having them come back with amazing stories of Alaska. In this day and age I believe that bear viewing tops bear hunting by leaps and bounds. I think it is an abomination to rile the population of bears in this areas trust towards humans. These bears are used to humans being non threatening. To allow hunting in this area may damage that trust and promote hostility to photographers and viewers in the years to come. Not to mention an almost "canned" hunt for these unethical hunters. Most ethical hunters oppose the hunting of these bears. Allow some areas, especially areas of great interest to wildlife viewers and photographers to be free of any incidental hunting residuals.

PROPOSAL 42 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Delay the brown bear

hunting season in Unit 9C as follows:

Delay opening of the brown bear hunting season until October 15 rather than the current date of October 1 in  
the Katmai Preserve (UCUs 0703 and 0702) of Unit 9C.

#### SUPPORT

Although I would rather there be no hunting in these areas, delaying the hunt I believe would be beneficial. Early October is a great opportunity to view bears in the prime of their fur and while I do know that this also is the same reason it makes them prime targets, I believe later in the season would fair better. Most females and females with cubs have denned up leaving the large older males stragglng for more food. I believe females and females with cubs should be completely off limits to any hunting at all.

PROPOSAL 44 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Modify this regulation to

36 provide the following: Remainder of Unit 9C: 1 bear every four years by drawing permit only.

#### SUPPORT

I was unfortunate enough, along with many others to witness the most unethical bear hunting video or hunting video ever viewed. These bears are entirely too habituated to non-threatening people. There are plenty of places in Alaska where bear hunting might even be appropriate but this is not one of them. Leave the preserve in it's natural state. No hunting.

Thank you for this opportunity,

Sabrina Leigh Lagana

**DATE:** February 12 2009

**ATTN:** **BOG COMMENTS**  
**Alaska Department of Fish & Game**  
Boards Support Section  
P.O. Box 12526  
Juneau, AK 99811-5526  
Fax: (907) 465-6094

**FROM:** **Debra Waugaman Curnow**  
Comments on Proposal #218 SUPPORT  
Phone: (907) 456-4056

Dear Members of the Alaska Board of Game:

I am representing myself although I am also a member of the Fairbanks Advisory Committee.

**PROPOSAL 218 - SUPPORT**  
**Modify the Season Dates for Dall Sheep - Region II**

I am a lifelong Alaskan and hunter who supports this proposal. Staggering the sheep season for residents and non-residents will increase the quality of the hunt for everyone. Additionally this should reduce the increasing social issues and hunter conflicts.

While some guides might complain that this would impact and/or reduce revenue to the Department of Fish and Game, I doubt there would be little if any impact. Any hunter who is interested in a dall sheep trophy, won't be deterred by a variation in season dates. Some years there are more opportunities for trophy rams on later sheep hunts when snow pushes the big rams into the lower areas.

In addition, biologically the harvest should not be impacted because of the full curl regulations. The only result may be a slightly higher success rate for residents. Currently the percentage of sheep hunter success is considerably lower than guided non-residents. Bottom line, everyone has a better experience hunting in our great State.

Thank you for allowing me the opportunity to comment

Sincerely,

*Debra Waugaman Curnow*

Debra Waugaman Curnow

RECEIVED TIME FEB. 13. 8:45AM

Public Comment # 9



## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

1011 E. Tudor Rd.

Anchorage, Alaska 99503-6199

IN REPLY REFER TO:  
FWS/AFES

FEB 13 2009

Mr. Cliff Judkins, Chairman  
Alaska Board of Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chairman Judkins:

The U.S. Fish and Wildlife Service (FWS) appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game during its Spring 2009 meeting. We would like to provide the following comments on proposals 56 and 62 which would change management of caribou and moose populations in Unit 17, including lands within the Togiak National Wildlife Refuge (NWR) and proposals 159, 160, 163, 164, and 165 which affect resources on Kodiak NWR lands.

The FWS supports adoption of proposals 56 and 62. Adoption of proposal 56 would reduce the harvest limit of caribou in Units 17A and 17C from five to one which is more appropriate for this portion of Unit 17 that typically has very few caribou available for harvest. Caribou from the Mulchatna Caribou Herd rarely make it over into this area and it will help reduce confusion for those areas of Units 17A and 17C that are closed to protect the nearby Nushagak Peninsula Caribou Herd. Adoption of proposal 62 would change the boundary of the winter registration moose hunt in Units 17B and 17C. To encourage westward expansion of moose into Unit 17A, portions of western Unit 17C were closed during the winter registration hunt. Moose have expanded into Unit 17A and have increased in number in western Unit 17C sufficient to provide for an additional hunting opportunity as proposed. This successful strategy is the result of the local people working hard to build the moose population in western Unit 17 along with coordinated management between them, the Alaska Department of Fish and Game (ADF&G), and Togiak NWR staff.

The FWS also supports adoption of proposal 163, but **does not** support proposals 159, 160, 164, or 165, which could impact wildlife populations on Kodiak NWR lands. Adoption of proposal 163 would likely reduce the mountain goat population that is an introduced and non-native species that currently has an increasingly high, and probably unsustainable, density of animals within a portion of the Kodiak NWR. A reduction in the population would be consistent with the ADF&G and the Refuge goal of maintaining the herd at a level below carrying capacity of the habitat on refuge lands. If proposal 163 is adopted, it would resolve changes requested in proposals 164 and 165 as they also request changes that would likely lead to a reduction to the mountain goat population in the same area. Therefore, adoption of proposals 164 and 165 would not be necessary. Adoption of

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Public Comment # 10

Mr. Cliff Judkins, Chairman

2

proposals 159 and 160 would both restrict hunter opportunity for caribou, which are actually feral reindeer in the case of Unit 8. This would likely lead to an increase in survival and size of the reindeer population on Kodiak NWR lands, which would be inconsistent with the purposes of Kodiak NWR and U.S. Fish and Wildlife Service policy 601 FW 3 (Biological Integrity, Diversity, and Environmental Health). Therefore, we do not support these proposals.

Thank you for your time to review our comments on these proposals.

Sincerely,

  
Regional Director

Public Comment #

10

**PROPOSAL 43 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

RECEIVED

Close brown bear hunting in a portion of Unit 9C as follows:

FEB 13 2009

Funnel Creek, Moraine Creek, and Battle Creek

BOARDS

**SUPPORT**

Dear Ms. St. Louis:

As a wildlife photographer (who has been published by National Geographic TV, among others), I have been traveling to Alaska for 14 years, and I will return again this summer.

While I'm not a hunter myself, I do not oppose hunting per se, and certainly not subsistence hunting, but in my opinion, shooting bears that have become habituated to the presence of people in Katmai/McNeil and then wander out into Unit 9C has nothing to do with hunting as I understand it. It requires no skills and no respect whatsoever, and is certainly not representative of the qualities I have come to cherish in Alaskan people.

I am aware that hunting also provides a source of income to the state of Alaska. However, I myself—and I'm sure all the bear viewers/photographers who come to Katmai each year—would be perfectly willing to pay a fee to be able to observe one of nature's most awesome creatures in the stunning scenery that is Katmai National Park. Katmai/McNeil holds the largest population of protected bears in the world, and, apart from Pack Creek and Anan Creek reserves down in the Southeast, is the one place in North America where relaxed interactions between bears and people are possible. This peaceful coexistence, however, depends on bears associating people with binoculars and cameras rather than high-powered rifles. The bear viewing opportunities in Katmai National Park are a world wildlife treasure, and should be treated (and marketed!) as such.

I therefore urge the Board of Game to take the steps necessary to preserve this priceless bear viewing resource that is very much suited to providing the Kenai, Alaska Peninsula and Kodiak communities with an increasing source of income for generations to come.

Yours sincerely,

Christa Hotz

Photographer/Translator

Hinterbühlweg 3

6340 Baar

Switzerland

Public Comment # 11

RECEIVED  
FEB 13 2009  
BOARDS

**Subject:** LETTER IN SUPPORT OF PROPOSALS 42, 43, 44 & 45

Natural Habitat Adventures has been bringing passengers to Katmai National Park for the past 19 years. Every summer, we bring approximately 150-200 people to the park for some of the best bear viewing in the world. We strongly support the proposals to reduce bear hunting in this area.

Wildlife viewing, and in particular bear viewing, is growing so rapidly in Alaska that it's accumulating a lot of attention world wide. In part, this is due to the bears having developed a trust for people and therefore no longer seeing them as a threat. Any level of bear hunting will change the relationship between humans and bears, and observing them up close will no longer be viable.

Our company is founded on the belief that bringing tourism to local communities to supplement the economy is the best way to benefit the people living there, and to help them understand the importance of their resources. Bringing responsible tourism to the area not only brings revenue, but also allows our passengers to see the importance of protecting the natural habitat of the wildlife for the benefit of future generations of locals and tourists alike.

Sincerely,  
Jennifer Bravo  
Destination Manager  
Natural Habitat Adventures  
PO Box 3065  
Boulder, CO 80307  
(800) 543-8917 toll free  
(303) 449-3711 phone  
(303) 449-3712 fax  
[www.nathab.com](http://www.nathab.com)



Please consider the environment before printing this email

February 10, 2009

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

RECEIVED  
FEB 13 2009  
BC-

RE: Board of Game Proposal No. 118

Dear Board of Game, Alaska Department of Fish and Game,  
I support Board of Game Proposal 118. The large eagle population of Homer is already reducing the size of the Sandhill crane population. Hunting of the cranes will continue to decrease the small population that spends the summer in the Unit 15C area. With the deterioration of the bird's winter habitat they will become even less numerous. Now is the time to provide the Unit 15C birds with a safe summer home, allowing them to once again enlarge the flock to a healthy size.

I urge you to support stopping the hunting of the already small population of cranes in Unit 15C so that they will be able to continue to migrate to the Homer area.

Sincerely,



Katherine Nitzberg  
18630 Snowy Plover Circle  
Anchorage, AK 99516

TALKEETNA COMMUNITY COUNCIL, INC.  
P. O. BOX 608  
Talkeetna, Alaska 99676  
email: [TCCsecretary@yahoo.com](mailto:TCCsecretary@yahoo.com)

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FEB 13 2009  
BOARDS

BOG Comments-Alaksa Department of Fish & Game,

The Talkeetna Community Council (TCC) discussed several Board of Game (BOG) proposals at it's February 2, 2009 meeting and would like to comment on the following proposals as they apply to Wolf/Predator Control in Unit 13E:

**Proposal 114-Opposed**

Extending the current boundary of the predator control area to the west bank of the Susitna River from below the Gold Creek Bridge to the mouth of the Talkeetna river would place predator control activities within the boundaries of Denali State Park, directly contradicting management strategies of the State Park. The area in and around the State Park, and the areas adjacent to Talkeetna and neighboring communities also see a great deal of recreational use placing dangerous hunting practices in close proximity to high use recreation areas. The current predator control boundary as defined also encompasses the Indian River State Recreation Area (IRSRA) which is managed by The Division of Parks and Outdoor Recreation and operated under the same management plan as Denali State Park. As an added suggestion restructuring the boundary eastward, away from the rail corridor and the two above mentioned recreation areas would be more consistent with already established managed lands and alleviate needless safety issues.

**Proposals 73 & 74-Opposed**

Extending the season for the baiting of black bear in units 11 & 13 from June 15<sup>th</sup> to June 30<sup>th</sup> would needlessly place recreational users of these areas at grater risk. By mid June (and early) many Alaskans and visitors will be using these areas in a non-hunting capacity. Particularly in the Denali State Park and Indian River SRA which prohibit the baiting of bears as a hunting practice. Having bears habituating to bait piles and roaming the areas would put people and the bears themselves at risk.

This management practice in these areas will also run directly counter to the progress in reducing people/bear encounters the local community and The Bear Necessities Coalition have strived so hard to achieve.

**Proposal 75- Opposed**

Allowing the baiting of Brown/Grizzly Bears in unit 13E would again place a needless amount of excess risk to the public. Much of the area adjacent to and with in 13E is multi-use, that is to say use other than hunting. Particularly if proposal 114 is accepted the 13E unit will be directly adjacent to the town site of Talkeetna and closer to the Trapper Creek community. Also

extending the boundaries to include Denali State Park. As is the boundary is too close to high use areas and baiting Brown Bears in this unit in any form, current or proposed, would be dangerous and negligent.

Bating bears in this area will also run directly counter to the progress in reducing people/bear encounters the local community and The Bear Necessities Coalition have strived so hard to achieve.

**Proposals 76 & &79- Opposed**

Opposed to increasing bag limits in unit 13E where hunting practices/management run counter to established management plans for State Parks and Recreation sites in the unit. Those being the management plans for Denali State Park and Indian River State Recreation Area.

Thank you for considering these comments,



Talkeetna Community Council Member

2/10/09

Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

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FEB 13 2009  
BOARDS

Dear Members:

Since Christmas, at least 3 dogs have been caught in traps in the vicinity of the Big Peters Creek Trailhead in Chugach State Park. This trailhead is adjacent to a subdivision and is frequently used by hikers, skiers, hunters and snowmachiners in season. One of the dogs was caught in a leg-hold trap set near the gate about one-half mile from the trailhead. A second dog was caught in a snare about a quarter mile up the "Boyscout" trail to Bear Mountain. I am not aware of the details about the third dog except to say the incident was told to me by Preston Kroes, a Chugach State Park Ranger. I will add that about five years ago, my dog was caught in a snare set about one-half mile from the trailhead. Luckily, all of the dogs survived. I believe all of the traps that caught these dogs were set legally which illustrates a huge problem with the current regulations – the setbacks from trailheads and trails for trapping are woefully inadequate.

Chugach State park is adjacent to Alaska's urban center. Most users of CSP are non-consumptive users who value wildlife viewing. This activity is incompatible with trapping. Therefore I support the elimination of trapping from CSP.

Given that I doubt you will pursue this course of action at your spring meeting, I wish to provide comments on the following proposals:

Proposal 20 – No trapping one mile from established trails in 14C.

Support as amended.

Amended language should read, "No trapping one mile from established trails in Chugach State Park."

Explanation: The regulations governing trapping setbacks in Chugach State Park of one quarter mile from trailheads and 50 yards from trails are woefully inadequate. Dogs are routinely getting caught in traps set legally in the park and prevention is entirely the responsibility of pet owners who should be able to walk or ski alongside their dogs unleashed.

Proposal 22 – Lynx should be added to the list of species that should not be trapped anywhere in CSP.

Support.

Explanation: Lynx are highly prized as an object of wildlife viewing in CSP by thousands of visitors. Although sightings are uncommon, elimination of trapping on this species will increase viewing opportunities to the benefit of many.

Proposal 23 – In Unit 14C within Chugach State Park, trapping is prohibited within 5 miles of any road.

Support.

Explanation: I support any proposal to increase the trailhead and trail setbacks for trapping. As noted above, existing regulations of one-quarter mile from trailheads and 50 yards from trails is woefully inadequate to protect pet dogs. Trappers should be required to travel further into the backcountry to set traps.

Proposals 24, 26, 27, 28 – Prohibit trapping of wolverines in Chugach State Park.

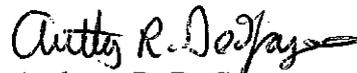
Support.

Explanation: Wolverines are the holy grail of wildlife viewing in Alaska and in Chugach State Park. Nearly all visitors to Chugach State Park desire to view this species.

Cessation of trapping for wolverines will increase viewing opportunities which represents a greater good for a greater number of users. The Board should also be mindful that ADF&G believes the status quo is unsustainable. The fact that ADF&G and ADNR are collaborating on this proposal should send a strong signal to the Board to implement this proposal.

Thank you for the opportunity to comment and I hope to hear good things about your work at the spring Board meeting.

Sincerely,



Anthony R. DeGange

P.O. Box 671264

Chugiak, AK 99567

907-786-7046

cc: James King, Director, Alaska State Parks  
Rick Sinnott, ADF&G



ATTN BOG COMMENTS

Alaska Dept. of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau AK 99811-5526

Comments on proposals for the Feb. 27,2009 Board of Game Meeting.

Dear Board Members; The following are my comments on the current proposals.

Proposal # 49 Oppose, Skogans crazy. Whatever could we accomplish? Killing juveniles while floating the water? Selling bear bomber hats?

Proposal # 51 Oppose.

Proposal # 52 Support Should increase the taking of adult bears still on the river and killing moose.

Proposal # 55 Support

Proposal # 57 Oppose, Leave it alone for now.

Proposal # 61 This moose permit ran off some bad seeds, which is what was intended, however the permit has no purpose now. The number of permits never got close to the limit of 75 therefore the permit is not needed. There's plenty of moose, just need to get predators in check. Also moose hunters must be in Dillingham by Aug. 31 to pickup the permit, can't hunt till Sept 5. Should be able to hunt predators at this time. I've hunted the Nusagak drainage since 2000 most of my time was spent on the Klutuspak creek [2000-2007] in all those seasons never once did I see a resident or native hunter above the 6 to 8 mile marker on the Klutuspak, I would see 2 or 3 on the Nusagak every year. Last year I spent the 6 wks on the Nusagak and Harris Cr, also time on the Nuyakok, Only saw 3 residents 6 times. I don't see how the moose permit is doing anything but hurting local economy, Repeal it, or change it.

Proposal #63 Support, Moose are plentiful, but everything changes, always. The weather has warmed a couple degrees in the fall, therefore the bulls still have velvet or are just losing it the last couple days of the season. The bulls don't respond to calling till last day or so, I think the season has changed a few days later than 6 or 7 years ago.

Proposal # 198 Support strongly, #2 with adendum. Guide/ outfitter's name to be on Client's bait permit and contract, also copy of contract to fish & game at time of pickup.

Proposal # 245 Oppose, Full metal jacket bullets are unnecessary, except in units 1 & 4 IBEP course is not like an insurance policy. Believe Me.

Proposal #

DON YOUNG - REG. GUIDE # 1205  
633 CHELSEA AVE  
ERIE PA 16505

A.P.G.S.

To: Board of Game  
Sherry Wright  
333 Raspberry Road  
Anchorage, Ak. 99518-1599

February 13, 2009

SRW  
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ALASKA DEPARTMENT  
OF FISH AND GAME

I strongly oppose to these proposals mention ahead. Introduced by these extremist sportsman urban hunters and trappers. Which in this state want to manage the wildlife according to their convenience and purposes. They are already laws covering harassment by humans armed or not, as if blasting away an animal for a "trophy" Definitely I VOTE NO in these proposal mention ahead:

- PROPOSALS 76,130,131 and 135 It is about brown bears In UNIT 7,13 and 15
- PROPOSALS 49, 50, 68 and 69 It is about brown bears In UNIT 9 and 17
- PROPOSAL 75 It is about brown bears In UNIT 13
- PROPOSALS 166 and 171 It is about black and brown bears In UNIT 16B
- PROPOSALS 189 and 192 It is about wolves and bears In UNIT 16B
- PROPOSAL 168 It is about black bears In UNIT 16
- PROPOSAL 170 It is about trapping and snaring bears In UNIT 16 a practice that has been long prohibited in Alaska

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- PROPOSALS 125 and 128 It is about black bears In UNIT 7 and 15
- PROPOSALS 132 and 153 It is about brown bears in Kenai Peninsula
- PROPOSALS 237 It is about brown and black bears, including sows and cubs In UNIT 20E
- PROPOSAL 239 It is about wolves targeting 80% of the wolves In UNIT 21E
- PROPOSALS 235 and 236 It is about extend predator control by six years.
- PROPOSAL 190 It is about to allow state personnel to use carbon

monoxide bombs Kill wolf pups in their dens. Not even Osama Bin Laden has this evil ideologies. This strategy use to control our wildlife is the most absurd and horrendous massacre that is been implemented to please a few rich sportsman urban hunters and trappers. This method is inhumane, savage, barbaric and unacceptable. I do not understand how truly Alaskans allow this unscrupulous sport hunting business to operate freely in Alaska. We need more diversity in the Board of Game, some members who actually educated and have scientific expertise. No just some rednecks who know how to trap and shoot and get paid for their votes by inside urban and outside hunting groups.

The tourists come to Alaska to enjoy the landscape and wild animals that we still have here. In 2007 the tourists brought \$ 3 billions dollars in revenue to the state of Alaska through hotels, restaurants, shops etc. which benefit the community in general. Without our wildlife tourism will decrease which would affect the state and its inhabitants.

Wild animals were created to balance their own population without the help of human is obvious, that if we take away their source of food, or invade their territory their behavior will change.

The state and Board of Game are the ones responsible for the decrease of moose and caribou for over-hunting. People come from all over the world to kill moose and caribou as trophies to please their own desires and ego. They want to eliminate wolves and bears just to have more moose and caribou for themselves and for their business.

According to all these proposals which were introduced for special interests and having the finitely of complete extermination of our wildlife. These lawless sport urban hunters and trappers without supervision in remote areas, I don't think they would follow the rules. The state and Board of Game are ignoring the voice of Alaskans. The state and Board of Game they only listening to white rich sports hunters and trappers.

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p 182  
Public Comment # 17

The wild animals are already suffering the consequences of the mismanaging of the natural resources. The Fish is already contaminated for the great doses of mercury result of the irresponsible discharge of contaminated waste from oil and mining industries. For example the solvent from most commonly used to process gold is HYDROGEN CYANIDE ( NACN) is a well known dangerous poison.

I do not support these proposals mention above. I think Fish and Game Advisory Committee, Board of Game and Government Sarah Palin are going too far. Government Sarah Palin was elected to work for all Alaskans. They should be respect the science and all Alaskans before they take this horrendous massacre decision of extermination and elimination of certain animals for their own convenience. They should work for the best interest of the state, instead of working for special interest and pleasing themselves and these rich hunters and trappers who hunt for trophies. They should preserve the natural resources for the future generations. And some people attack those who are opposes their ideologies, but this is a free country and they need to respect other people's opinions.

Yolanda de la Cruz  
806 West 57<sup>th</sup> Avenue  
Anchorage, Ak. 99518

*SN*  
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FEB 13 2009  
ALASKA DEPARTMENT  
OF FISH AND GAME



www.TerraMagica.ca  
Peter A. Dettling - Nature photography / paintings  
#120-200, Prospect Heights/TIW 3A3 Canmore/AB, Canada  
email : padphotography@shaw.ca Tel: (403) 609-2614

February 13, 2009

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

To Whom It May Concern

Re: In Support of PROPOSAL 43 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Close brown bear hunting in a portion of Unit 9C as follows: Funnel Creek, Moraine Creek, and Battle Creek

Dear Members of the Board,  
Please accept this letter that states the support of proposal number 43 - 5 AAC 85.020.

I am opposed to any hunting of brown bears within Unit 9C in Katmai National Park and Preserve.

Most of these bears are used to the presence of humans in their close proximity and a hunt of these bears is not only unethical but the high quota set for this unit does not support a sustainable take.

The future of this place belongs to bears and people that can co-exist peacefully. Bear viewing and wildlife watching industries far outweigh in many cases economic income, when compared to trophy hunting of the same animals.

Please do the right thing and close this controversial hunt once and for all. Not only the bears would benefit for such a wise decision, but the overall world-wide admiration for Alaskans and their land would benefit as well.

Sincerely,  
Peter Dettling

**Wright, Sherry (DFG)**

**From:** Andrea Veach [andrea.veach@yahoo.com]  
**Sent:** Friday, February 13, 2009 12:40 AM  
**To:** Wright, Sherry (DFG)  
**Subject:** Comments - Board of Game - Southcentral/Southwest Region

Adm: Scott BOG  
Public Comment

I have attempted to send the following comments via fax to 267-2489. Each time it failed. Thus, I am sending the following.

Andrea Veach  
PO Box 90534  
Anchorage, Alaska 99509-0534

Home phone: 907-349-7302

February 12, 2009

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BOARDS  
ANCHORAGE

Southcentral Region  
Sherry Wright  
333 Raspberry Road  
Anchorage, AK 99518-1599  
Phone: (907) 267-2354  
Fax: (907) 267-2489

I'm writing to express my opinions about some of the proposals the Board of Game will be voting on at its next meeting in Anchorage. Please consider my comments as you review the proposals that have been submitted for your vote -- many of which are excessive, unscientific and unjustified attempts to benefit hunting interests and continue the state's extreme approach to predator control -- as they will have lasting consequences for Alaska's wildlife and for future generations of Alaskans.

I urge you to VOTE NO on:

Proposals 76, 130, 131 and 135, which seek to increase brown bear hunting in Unit 7, 13 and 15.

Proposals 49, 50, 68 and 69, which seek to create a new predator control program aimed to reduce brown bears and wolves in Units 9 and 17. This proposal was put forth by an Advisory Committee and is supported only by anecdotal claims about bear and wolf predation on moose. Anecdotal evidence is insufficient justification for creating new predator control programs, as seen in McGrath in 2000 and 2001.

Proposal 75, which would allow brown bears in Unit 13 to be taken over bait stations, and also on Proposals 166 and 171, which would modify the predator control program in Unit 16B to allow baiting of brown and black bears all summer and allow the use of snares and traps to take black bears. The aggressive means of harvest in this Unit has been shown to be ineffective and should be revoked -- not further liberalized. Furthermore, allowing bear baiting during the summer months will only compound the problem by habituating bears to human food and further compromise public safety and private property.

Proposals 189 and 192, which would allow helicopters to transport hunters to the Unit 16B predator control area, authorize the baiting of bears in the summer and, for the first time ever, permit private citizens to use helicopters to access remote areas in order to kill wolves and bears.

Proposal 168, which would allow same-day aerial hunting of black bears in Unit 16 and allow helicopters to be used to transport hunters including, for the first time ever, out-of-state hunters to remote locations, without imposing any bag limits. This proposal also, for the first time, seeks to allow youth to participate in predator control programs. Our state predator control programs require all individuals who participate to sign a legally binding agreement, and minors cannot sign such agreements.

Proposal 170, which would allow trapping and snaring of bears in Unit 16 under a predator control permit. Trapping and snaring bears has long been prohibited in Alaska with good reason. Steel leg-hold traps large enough to hold bears are a danger to people, pets and other non-target wildlife like caribou and moose. In addition, this capture method raises serious ethical concerns. Bears wounded in snares or traps could escape, resulting in a prolonged, inhumane amount of suffering. The public strongly opposes snaring of bears. I urge you to reject this proposal.

Proposals 125 and 128, which seek to create predator control programs in Units 7 and 15 and allow black bear hides and skulls to be sold, which would only promote the illegal harvest of bears for profit and go against the recommendations of State Wildlife Troopers. In addition, allowing the sale of bear parts has not been effective in increasing black bear harvest, as evidenced in Unit 16.

Proposal 170, which seeks to allow trapping and snaring of bears -- a practice that has been long prohibited in Alaska -- in Unit 16 under a predator control permit. Traps large enough to snare bears are a serious danger to humans, pets and other non-targeted wildlife.

Proposals 132 and 153, which would threaten Kenai Peninsula brown bears by eliminating their status as a species of special concern.

Proposal 237, which would allow brown and black bears, including sows and cubs, to be killed using snares and same-day airborne hunting in Unit 20E. This proposal flies in the face of decades of tradition where cubs and mother bears have been protected from hunting and will undoubtedly be unpopular with the majority of Alaskans. We should continue to protect bear cubs and sows in Alaska. In addition, snares are indiscriminate and can catch many non-targeted species, including moose, and if a cub gets caught in these traps, the danger to the public posed by its mother could be severe. This proposal would also establish a working group to recommend additional actions to further reduce bears in this area. If a working group is established, I hope you will include representatives from the scientific and conservation communities.

Proposal 239, proposed by the Alaska Department of Fish and Game (ADFG), which would establish a new predator control program targeting 80% of the wolves in 8,000 square miles of Unit 21E (Proposal 239) -- even though they have no reliable data on how many wolves are in the area. How can the ADFG claim that predator control is justified or assert that state personnel will not shoot 20% of the wolves if they don't know how many wolves are there to begin with?

Proposals 235 and 236, which would extend the predator control program in Unit 19A by six years and in Unit 19D (East) by five years, respectively. Neither program has ever been scientifically justified, and if the Board votes to continue them, it should conduct the studies necessary to prove that wolf predation is the main limiting factor for moose. And, finally, Proposal 190, which the ADFG has put forward to allow state personnel to use carbon monoxide bombs to kill wolf pups in their dens. As you know, denning in general is incredibly unpopular with Alaskans and using poisonous gas in order to conduct denning is likely to be met with public outrage.

On the positive side, I would like to express my support for several proposals which will have positive impact on Alaska wildlife and the wildlife-viewing public.

These include proposals on the table to end lynx and wolverine trapping in Chugach State Park (Proposals 22 and 27, respectively), decrease the harvest of brown bears in Katmai, Lake Clark, Wrangell St. Elias and Denali National Preserves (Proposals 44, 45, 51, 77, 78 and 174) and close the brown bear hunting season where much-loved McNeil River bears can be found after leaving the falls in the autumn (Proposal 43).

And, finally, I urge you to support Proposal 224, which calls for the Board of Game to continue to protect white-colored bears, which are extremely rare, provide viewing benefits to Alaskans and tourists alike, and are of spiritual significance to many Alaskans.

I hope you will take my views, and the views of other Alaskans who care about responsible, science-based wildlife management, into consideration as you review and vote on these important proposals.

Sincerely,  
Andrea Veach

February 11, 2009

**ATTN: BOG COMMENTS**

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811 - 5526  
Fax: 907-465-6094

**SUBJECT: COMMENTS TO PROPOSAL 48 - 5 AAC 92 XXX. Special provisions for Unit 10, Unimak Island, Brown Bear permit hunts.**

**PROPOSAL COMMENT INDIVIDUAL:** Richard A. Bettas  
PO Box 327  
King Cove, Alaska 99612

**PROPOSAL POSITION: OPPOSITION**

**REASON FOR OPPOSITION:** The current permit system in place for Unit 10 is meeting its intended objectives and is fair to all permit applicants and permitted guides.

The verbiage in this proposal is biased, unsubstantiated, erroneous and irrelevant.

It appears the proposal's author wants the other guide on Unimak to be penalized for what the author can not do - that is to provide a safe, high quality wilderness experience to all permit holders (both resident and non-residents) and other refuge users with minimal impact to the resources and land of Unimak island.

**MY OPPOSITION QUALIFICATIONS:** I have been a resident of King Cove (approximately 50 miles from Unimak Island) since 1979. The time I have spent working on commercial fishing boats and hunting, camping and working on and around Unimak Island has enabled me to gain an excellent knowledge of the entire island and its resources.

Any additional information concerning these comments will be made available.

Signed,

*R. A. Bettas*

Richard A. Bettas

Feb 10, 2009

RECEIVED  
FEB 13 2009  
BOARDS

Board of Game Members,

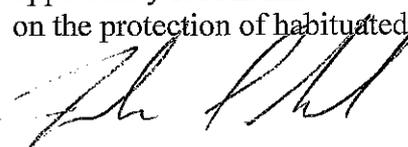
I am writing to express my support for Proposal 43 and Proposal 44 which will limit the hunting of bears habituated to bear viewers and wildlife photographers.

Both these proposals will significantly support the bear viewing industry in Alaska. Bear viewing generated \$100 million dollars last year. As someone who spends time in Katmai I can testify that the bear viewing industry doubled if not tripled from 2007 to 2008. As a board of game member, you have the power to help this industry continue to grow, or to contribute to its demise.

Bear viewing is an industry that supports the communities of Homer, Kodiak and King Salmon – areas surrounding reliable bear viewing sites in Katmai National Park. The revenue generated by bear viewers is immense. The opposition to bear viewing is based on antiquated cultural values that aim to exploit wildlife, even at the expense of economic opportunities for Alaskan communities and citizens.

By supporting these proposals, bears that are habituated to bear viewers will be protected from sport hunting. This will help the industry to grow and assure that tourists – spending \$500/half day to see bears – will be guaranteed a safe viewing experience.

Allow Alaska to become the model for wildlife viewing that the world can follow. Sport hunting is not a sustainable industry. Wildlife viewing is sustainable. Most tourists come to Alaska to see wildlife, not to shoot it. Don't shoot Alaska's economy in the foot by refusing to modernize. Please invest in wildlife viewing as a viable economic opportunity for Alaska. The communities of Homer, Kodiak, and King Salmon depend on the protection of habituated grizzly bears.

  
John Teel  
Anchor Point, Alaska

Feb 10, 2009

RECEIVED  
FEB 13 2009  
BOARDS

Board of Game Members,

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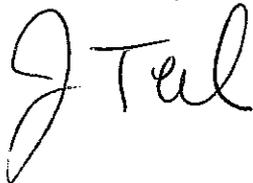
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Allow Alaska to become the model for wildlife viewing that the world can follow. Sport hunting is not a sustainable industry. Wildlife viewing is sustainable. Most tourists come to Alaska to see wildlife, not to shoot it. Don't shoot Alaska's economy in the foot by refusing to modernize. Please invest in wildlife viewing as a viable economic opportunity for Alaska. The communities of Homer, Kodiak, and King Salmon depend on the protection of habituated grizzly bears.

Jessica Teel  
Anchor Point, Alaska



Public Comment # 21

RECEIVED  
FEB 13 2009  
BOARDS



# Alaska Trappers Association

P.O. Box 82177  
Fairbanks, AK 99708

ATTN: BOG COMMENTS  
Alaska Department of Fish & Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK, 99811-6094

February 10, 2009

Dear Mr. Chairman and Members of the Board:

Thank you for the opportunity to comment on these proposals. As you know the Alaska Trappers Association has state-wide membership and represents the best interests of trapping, game management and Alaskan heritage.

### Proposal #'s 20, 21, 23, 24, 25, 26, and 28

Wolverine trapping in Chugach State Park Management Area, Unit 14  
We are **OPPOSED** to all of the above and have chosen to offer our comments on proposal 27.

### Proposal #22

Lynx trapping in Chugach State Park Management Area, Unit 14  
We are **OPPOSED** to this proposal. There is no biological data supporting this proposal.

### Proposal #27

Wolverine trapping in Chugach State Park Management Area, Unit 14C  
We are **OPPOSED** to this proposal as written. However, we could support the proposal if it were amended to match the State trapping season with the federal trapping season (Nov 10<sup>th</sup> - end of Feb) in the balance of unit 14C outside Chugach State Park. We also suggest that the restrictions and closures for trapping that were implemented inside the Chugach State Park as a result of wolverine trapping be rescinded.

### Proposal #37

Modify the hunting/trapping season for lynx in Unit 6  
We **SUPPORT** this proposal. Please refer to Alaska State statute 16.05.258. Lynx has historically been a species harvested by trapping.

**Proposal #71**

Trapping season for coyote in Unit 13

We are **OPPOSED** to this proposal. There is no biological data to confirm the incidental catch mentioned in the proposal. In addition, the coyote population is abundant.

**Proposal #119**

Lengthening the trapping season for beaver Units 7 and 15

We **SUPPORT** this proposal. Beaver populations are abundant. In some areas, they are so abundant as to represent a nuisance. The changes requested in this proposal would allow additional harvest and use of a renewable natural resource.

**Proposal #120**

Close a portion of Unit 15C for beaver trapping

We are **OPPOSED** to this proposal. There is no data in this proposal to support the implication that over-trapping may have been responsible for the population decline. This seems to be an effort to micro-manage GMU 15.

**Proposal #121**

Close trapping season for red fox in Units 7 & 15.

We are **OPPOSED** to this proposal. We question the scientific validity of the speculative comments suggesting that red fox on the Kenai Peninsula may be a "unique subspecies." We are also offended by the implication that the current regulatory system instituted by the Board of Game and the Department of Fish & Game lacks credibility.

**Proposal #122**

Season and bag limit for marten in Unit 15

We are **OPPOSED** to this proposal. There is no biological data to support the claim.

**Proposal #123**

Season and bag limit for wolverine in Unit 15

We are **OPPOSED** to this proposal. There is no biological data to support this claim.

**Proposal #157**

Season end dates in unit 7 & 15.

We **SUPPORT** this proposal. We suggest that the concept represented by this proposal (ie, changing season closing dates **from** "February 28" to "the last day of February") be extended to all GMU's in the State.

**Proposal #170 & 171**

Use of traps/snares for bear management in Unit 16

We **SUPPORT** this proposal. We suggest that the Board consider a requirement that all potential bear trappers/snarers attend a training course which would focus on the techniques of bear trapping. Sale of bear hides and skulls taken through trapping should be allowed.

**Proposal #185**

Align season dates in Unit 16 with Unit 13 for wolf and coyote trapping.

We **SUPPORT** this proposal. Alignment of these units will help with predator control.

**Proposal #190**

Review of intensive management options for the Department of Fish & Game

We **SUPPORT** this proposal. We suggest that this proposal be amended to include the use of snares/traps by members of the public after they have taken an approved training orientation by the Department of Fish & Game. The private sector is willing to participate in this program, thus allowing limited government funds to be used for other purposes. The sale of bear hides & skulls taken through approved trapping/snaring should be allowed.

**Proposal #237**

Predation control Unit 20E

We **SUPPORT** this proposal. We suggest that the wording be amended to include the Alaska Trappers Association in the working group, along with the groups already listed.

The final comments we would like to direct to the Board of Game are of general support for predator control. When biological data from the Department of Fish & Game indicates that prey populations are being suppressed by predators, we believe that reduction of predator populations may be the only realistic solution for recovery.

Thank you for the time and consideration you have given to our comments.

Sincerely,



Randall L. Zarnke, President



## CHUGACH STATE PARK CITIZENS' ADVISORY BOARD

HC 52 Box 8999, Indian, Alaska 99540 Phone: 907-345-5014 Fax: 907-345-6982

Monday February 9, 2009

RECEIVED  
FEB 13 2009  
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To Alaska Board of Game;

Thank you for soliciting written comments regarding the Spring, 2009 regulatory proposals. On behalf of the Chugach State Park Citizen's Advisory Board (CSPCAB), I submit the following comments related to several proposals currently before the Board of Game (BOG) which may affect activities within Chugach State Park (CSP).

The CSPCAB represents a wide variety of interests. We are comprised of recreational trail users (hikers, runners, cyclists, skiers, and snow machiners), hunters, trappers, fishermen, wildlife viewers (photographers, artists, etc...), and include representation from neighboring communities to the Park. With over 1.2 million visits to the Park in 2008, we are especially interested in BOG regulation changes that may affect CSP resources and visitors. At approximately 495,000 acres, CSP is among the four largest state parks in the US and most of the park is within the boundaries of the Municipality of Anchorage.

As an advisory board, our decisions are guided by the five primary purposes in creating CSP:

1. To protect and supply a satisfactory water supply for the use of the people.
2. To provide recreational opportunities for the people by providing areas for specified uses and constructing the necessary facilities in those areas.
3. To protect areas of unique and exceptional scenic value.
4. To provide areas for the public display of local wildlife.
5. To protect the existing wilderness characteristics of the easterly interior area.

Thank you for this opportunity to respond to the specific regulatory proposals submitted for the Spring, 2009 BOG meeting. The BOG has a sound procedure for both suggesting proposals to game regulations as well as responding to such proposals and we strongly support the public review process. We hereby include comments regarding several BOG proposals.

### Proposal #'s 2-3

We support proposal #'s 2 and 3. With bear/human encounters particularly high recently; these two proposals are of particular interest to the CSPCAB. We also support the department's suggestions to expand the bear hunting season within CSP as well as the proposed Eklutna area bow season. It is anticipated that these changes to the regulations will help mitigate community interests in seeing more bear harvested in the area through hunting. We see these proposals, along with increased and continuing efforts to educate the community regarding human behaviors for limiting dangerous encounters, as both positive and helpful.

**Proposal #'s 7-12**

These proposals, which affect activities within CSP, were submitted by Alaska Department of Fish and Game (ADF&G) and we support each. These proposals request reauthorization of various antlerless moose hunts and we support the ADF&G's management of these hunts.

**Proposal #'s 20, 21, 23**

Each of these proposals requests various changes in buffers between trapping and other areas or uses within CSP. The BOG has already adjusted buffering regulations between trapping and other uses and we do not support these proposals.

**Proposals 24, 26, 27, 28**

The CSPCAB is the sponsor of proposal #24. We also support each other proposal which would have the same effect – the prohibition of wolverine trapping within CSP. There are many reasons for the BOG to support this regulation change.

As an advisory board, one of our focus areas is to maintain a valuable wildlife viewing experience, per the original intent in establishing the CSP. With an extremely small population of wolverine (per ADF&G), it is of utmost importance to maintain this population, rather than allow activities that may reduce or even eliminate wolverines from the park. ADF&G also addresses this need (proposal #27) in support of maintaining a healthy wolverine population per ADF&G biological studies in recent years.

It is within the best interests of the BOG, the CSPCAB, the Municipality of Anchorage, and ALL users of CSP for the BOG to update its existing trapping regulations to prohibit the trapping of wolverine within CSP.

Thank you for this opportunity to comment.

Sincerely,



Julian Mason  
CSPCAB Vice-Chairman

M Smith  
Box 1561  
Homer, Ak  
99603

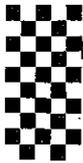
RECEIVED  
FEB 13 2009  
BOARDS

Feb. 10, 2009.

Dear Board of Game,

I am writing to express my strong support for your proposal No. 118, to close a crane hunting season here, in Unit 15c.

Sincerely,  
Matt Smith



Feb 09

Attn: BOG Comments  
Alaska Dept of Fish & Game  
Boards Support Section

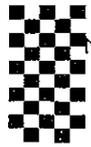
Re: Comments in support of Sheep Proposal #218 Page 177

B.O.G.

Knowing of several incidences of conflict between Alaskan sheep hunting and commercial guided hunts, I feel strongly that Sheep Proposal #218 would eliminate these conflicts. I feel that #218 would make for a higher quality hunt for both Alaskan hunters and guided hunters. I don't feel that there are any losers in the proposal. Please consider passing Sheep Proposal #218.

Thanks for your time,

*Gary Halvstad*  
Gary Halvstad  
3411 Hill's Way  
Fairbanks, AK 99709  
907-479-8950



facsimile transmittal

To:	Board of Game	Fax:	907-465-6094
From:	Martina Steinmetz	Date:	2/12/2009
Re:	Proposal 21/5AAC92.550	Pages:	1
Cc:			

x Urgent      For review      Please comment      Please reply      Please recycle

To Whom It May Concern,

I hereby ask you to consider Proposal 21/5AAC92.550 concerning Areas Closed to Trapping. The hardship the current trapping regulations in the State Park have imposed on community members in Indian and Bird Creek is not justifiable. Beloved family dogs have been killed in higher numbers than wolverines and it is only a question of time that a child gets hurt. Please banish trapping for a mile radius around our communities. Don't wait until a human is hurt and lawsuits become necessary.  
Thank you for your consideration, Martina Steinmetz

**Territorial Sportsmen Inc.  
Comments of Board of Game Proposals  
February 27-March 9, 2009**

RECEIVED  
FEB 13 2009  
BOARDS

Predator Management

Territorial Sportsmen Inc. (TSI) urges the Board of Game to use caution in expanding the predator management program to too many new areas and to not allow the predator management permit holders to use helicopters to take wolves. Under current regulations and permit stipulations permit holders are allowed to take wolves from fixed-winged aircraft within approved predator control area. Altering the program to allow the permit holders to use helicopters to take wolves as proposed in Proposal number 192 will dramatically raise the level of controversy. It will provide the opponents of wolf management an important focal point in their efforts to have Congress pass the Protect America's Wildlife Act. This proposed legislation by Congressman George Miller of California would end the use of all aircraft to manage predators to benefit wildlife.

It will be much less controversial and more effective for the Board of Game to authorize the Alaska Department of Fish and Game to use helicopters late in the winter if permit holders have not reach the reduction goals set by the Board. While this would be more costly to the Department it would assure that the goals would be achieved. Department personnel have the ability and experience to do the job in a minimum amount of time. Some opponents of predator management have insisted that wolves only be taken by department staff in helicopters, so they would likely not try to stop this action. On the other hand, they would fight hard to stop permit holders from using helicopters.

TSI supports the implementation of a predator management program in GMU 21E (Proposal 238). The department has conducted surveys of moose and predators that indicate predation must be reduced to allow the moose population to recover. It is vital that reliable survey information is collected in every area prior to implementation of predator control programs. We believe it is premature to expand the programs into to GMU 7, 15, and 17.

Use of helicopters to set up and maintain black bear bait station as proposed in Proposals 168 and 189 might be less controversial than allowing permit holders shooting wolves from helicopter, but not a whole lot less. Another part of Proposal 168 would allow non-resident hunters to participate in taking black bears at bait sites. This is a terrible idea. The Board and Department worked for years to keep hunting and predator management separate. An important concept when defending predator control to a skeptical public is that predator management is not hunting for sport, but is a necessary management action to reduce predation on moose or caribou populations. To allow non-resident hunters to participate in predator management programs would be suicidal. The opponents of wolf control already claim the predator reduction programs are only to benefit the rich non-resident hunters. Allowing expensive helicopters and non-resident hunters participate in predator management programs could lead to the end of predator management in Alaska.

Please do not pass proposals 168, 189 and 192. They might sound good on the surface, but they would prove to be very damaging to the predator management programs.

#### Trapping restrictions

Trappers are already required to set their traps a reasonable distance from road and frequently used trails to protect hikers and their pets. The purpose of proposals 20, 21, and 23 appears to be an attempt to stop trapping and TSI opposes these proposals.

#### Brown bear management in GMU 9

Several proposals request additional restrictions on Brown Bear seasons in GMU 9. The vast majority of this area is already closed to brown bear hunting due to hunting closures in the McNeil River Refuge and Katmai National Park. TSI opposes Proposals 42, 43 and 45 because they simple are not necessary. The brown bear population in GMU 9 is already managed very conservatively and no addition restrictions are warranted.

#### Wildlife Harvest in National Preserves

The National Park Conservation Association has submitted 11 proposals to drastically reduce the harvest of wildlife within National Park Preserves. ANILCA specifically states that hunting is allowed in National Preserves. The Alaska Department of Fish and Game has managed the harvest of wildlife on National Preserves since they were established in 1980. The National Park Service and the Department often cooperate to conduct wildlife surveys and population estimates. The NPS has not expressed any concerns about the amount nor methods of wildlife harvest within Preserves.

The proponent of these proposals asked in many instances that season and bag limits be returned to what they were in 1992. This seems to be biologically irresponsible. Bag limits and seasons should be based on current population size and trends, not on a harvest level from 16 years ago.

TSI urges the Board to not pass proposals 44.51, 64, 67, 77, 78, 112, 151, 152, 174 and 186.

#### Relocating moose

TSI opposes proposal 205 that would allow moose under 2 years of age to be captured, held in captivity until at least one year of age and then be released onto Native owned "wilderness" or in remote areas away from roads. Moose that survive their first winter have a good chance of survival. Capture and transport of moose more than one year old is very dangerous to both the moose and the people trying to move them.

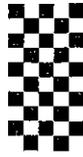
Moose calves that are orphaned during the first few months of their life have low survival rate, and they are much easier to handle. The chances of influencing the level of the moose population via transplanting is very low. It is simply not viable to transplant enough moose to have a population impact.

Reducing auto accidents and managing predators have a much greater chance of succeeding. The Alaska Moose Federation has a program in cooperation with the Alaska Department of Fish and Game to reduce auto and train accidents by manipulating vegetation along the roads and railroads. TSI supports this effort because it has a high probability of reducing accidents and increasing the moose population. Transplanting moose would be very expensive, man-power intensive and will not produce a population response.

#### Cow moose seasons

TSI supports all of the proposals to reauthorize cow moose seasons. If department data indicate the population can support a cow harvest, such seasons should occur. The demand for moose is high and many hunters like to eat cow moose. TSI supports proposals 7,8,9,10,11,12,39,40, 41, 178,183,225, 226, 228, 229, 231, 232 and 234.

Territorial Sportsmen Inc. is located in Juneau Alaska. Our purpose is to promote conservation and the rights and privileges of hunters, trappers, and sports fishermen. TSI currently has just over 1800 members.



Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526  
FAX# 907-465-6094

To who it may concern,

I may be at some of the BOG meetings but I know I will not be there the last five days. I would appreciate it if you would consider my concerns on the proposals listed below. I am especially interested in the proposals involving GMU-9E pertaining to moose. I have operated a business there for thirty-five years and have never seen moose populations so low. The area cannot support any additional moose hunting pressure. Furthermore, I feel the area has many management issues and has been neglected by wildlife officials for many years. I have emailed my concerns to the Alaska Professional Hunters Association.

Below is a listing of the proposals I have commented on.

Prop 42-5AAC 85.020 Regarding delaying the Brown Bear season until Oct 15

Most of the areas of southwest Alaska were much more popular hunting areas long before sport fishing became popular. The communities thrived on guided hunts because there was little sport resident hunting. I am not a licensed guide in GMU 9C but from experience in 9E I know for a fact that most small lakes in the area freeze up around Oct 10th making many access points inaccessible. Furthermore, I see no reason other than ascetics for displacing a regulated hunt.

There are many other proposals pertaining to unit 9C. In looking over them there seems to be many that want to stop hunting altogether in this unit. Long before this happens there should be a consideration for a shorter season to reduce harvest. While this may not achieve all the proposed goals, because we guides are good at what we do, it will reduce some harvest and still allow hunter opportunity.

Prop 47-5AAC85.020 Because I do operate a guide business in this GMU I am against this proposal. It will be a just matter of time before there are over harvest issues in 9E if this is adopted. A better approach would be to have a spring and a fall season for one or two years as determined by the fish and game biologists from that area and let all hunters participate resident and non-resident. Furthermore, with general hunting seasons and federal subsistence seasons the area already has a liberal bear season for locals willing to take the time out to do the paperwork. I believe this proposal will also open the door to more illegal guiding, which is already rampant in this area.

Prop 58-5AAC85.045 Because I guide this area and in the past two years have implemented my own harvest goals, less than my federal permits allot, I have a keen interest in this proposal. The moose population is not doing that well primarily due to predation but also consideration has to be given as to how long the seasons are open. While the general fall season is short, the subsistence season is long as is the winter season. I would like so see the portion of the proposal that pertains to Unit 9E to read:

Unit 9E            Dec. 15-Jan. 20  
Resident Hunters:

Change resident hunters to: Rural resident hunters only this will provide for the local people, reduce winter trophy hunting, and in time bring the moose population back to a more harvestable level. I've been in this area over 35 years and twice have had to reduce my allocated take as a guide due to poor population objectives. In areas where I used to see four or five bulls with their accompanying cows, you are lucky to see one moose. If I continue to harvest all the animals on my permit the demise of the population will be further evident and eventually will be resolved by a tier II hunt.

Some Soldotna based air taxis will be displaced because of this but they can easily move to another area to rape and pillage the country where I cannot.

Proposal 158-5AAC 92.052 The Kodiak Island sealing condition was initiated years ago to keep bears from the Island on the Island instead of showing up in Bristol Bay or Anchorage for sealing. While this has proved to be cumbersome at times the system has worked well and I would not like to see it changed as I

believe a change could impact Bear populations on the Island in a negative way. I am against this proposal.

Proposal 163-5AAC85.040 There are three proposals that pertain to mountain goat hunting in GMU8. I do guide in this unit and have for a number of years. Resident and non-resident compete in the draw for the same permit as the system exists today. To reduce population objectives the number of permits was increased a few years back. To further reduce population a registration hunt was initiated that had to originate from a local village. This proposal if monitored will reach population objectives through guided hunting. I am in favor of this proposal.

Proposal 164-5AAC85.040 I like this proposal better than proposal 163 as it will reach harvest objectives of ADFG and will provide a more long term approach to goat hunting. It will improve Kodiaks economy and eventually slow the rising population of goat on the island and give the guides operating there something they can derive a income from year to year. I favor this proposal over proposal 163. If resident permits are not picked up, they should consider allocating these unused permits to interested guides for non resident harvest until harvest goals are reached.

Proposal 2065AAC 85.045 I am against this proposal primarily because it includes GMU9. In addition to the general season there is a winter season and a federal subsistence season, with all of this, the moose in this area are already over hunted. Archery hunters can hunt the general season like everyone else. Moose are very easy to call in the last ten days of September and more over harvest of the area will result. This could also result in a much higher DLP kill for brown bears during this time frame.

Proposal 220-5AAC92.085 I am very much in favor of this proposal as anyone operating a legal guide business on Kodiak Island can tell you, there is rampant illegal guiding going on year after year, day after day, bay by bay. I might add that it doesn't pertain just to deer hunts.



**ATTN: BOG COMMENTS**  
**Alaska Department of Fish and Game**  
**Boards Support Section**  
**P.O. Box 115526**  
**Juneau, AK 99811-5526**  
**Fax: 907-465-6094**

Please consider my comments as you review the proposals that have been submitted for your vote.

I urge you to VOTE NO on:

**Proposals 76, 130, 131 and 135**, which seek to increase brown bear hunting in Unit 7, 13 and 15. There is insufficient evidence to support this increased hunt.

**Proposals 49, 50, 68 and 69**, which seek to create a new predator control program aimed to reduce brown bears and wolves in Units 9 and 17. This proposal was put forth by an Advisory Committee and is supported only by anecdotal claims about bear and wolf predation on moose. Anecdotal evidence is insufficient justification for creating new predator control programs, as seen in McGrath in 2000 and 2001.

**Proposals 75, 166, and 171**, which would allow brown bears in Unit 13 to be taken over bait stations, and which would modify the predator control program in Unit 16B to allow baiting of brown and black bears all summer and allow the use of snares and traps to take black bears. The aggressive means of harvest in this Unit has been shown to be ineffective and should be revoked -- not further liberalized. Furthermore, allowing bear baiting during the summer months will only compound the problem by habituating bears to human food and further compromise public safety and private property.

**Proposals 189 and 192**, which would allow helicopters to transport hunters to the Unit 16B predator control area, authorize the baiting of bears in the summer and, for the first time ever, permit private citizens to use helicopters to access remote areas in order to kill wolves and bears. This simply goes far beyond any responsible predator control program.

**Proposal 168**, which would allow same-day aerial hunting of black bears in Unit 16 and allow helicopters to be used to transport hunters including, for the first time ever, out-of-state hunters to remote locations, without imposing any bag limits. This proposal also, for the first time, seeks to allow youth to participate in predator control programs. Our state predator control programs require all individuals who participate to sign a legally binding agreement, and minors cannot sign such agreements. Again, this is excessive and unwarranted, and possibly illegal.

**Proposal 170**, which would allow trapping and snaring of bears in Unit 16 under a predator control permit. Trapping and snaring bears has long been prohibited in Alaska with good reason. Steel leg-hold traps large enough to hold bears are a danger to people,

pets and other non-target wildlife like caribou and moose. In addition, this capture method raises serious ethical concerns. Bears wounded in snares or traps could escape, resulting in a prolonged, inhumane amount of suffering. The public strongly opposes snaring of bears.

**Proposals 125 and 128**, which seek to create predator control programs in Units 7 and 15 and allow black bear hides and skulls to be sold, which would only promote the illegal harvest of bears for profit and go against the recommendations of State Wildlife Troopers. In addition, allowing the sale of bear parts has not been effective in increasing black bear harvest, as evidenced in Unit 16.

**Proposal 170**, which seeks to allow trapping and snaring of bears -- a practice that has been long prohibited in Alaska -- in Unit 16 under a predator control permit. Traps large enough to snare bears are a serious danger to humans, pets and other non-targeted wildlife.

**Proposals 132 and 153**, which would threaten Kenai Peninsula brown bears by eliminating their status as a species of special concern.

**Proposal 237**, which would allow brown and black bears, including sows and cubs, to be killed using snares and same-day airborne hunting in Unit 20E. This proposal flies in the face of decades of tradition where cubs and mother bears have been protected from hunting and will undoubtedly be unpopular with the majority of Alaskans. We should continue to protect bear cubs and sows in Alaska. In addition, snares are indiscriminate and can catch many non-targeted species, including moose, and if a cub gets caught in these traps, the danger to the public posed by its mother could be severe. This proposal would also establish a working group to recommend additional actions to further reduce bears in this area. If a working group is established, please include representatives from the scientific and conservation communities.

**Proposal 239**, proposed by the Alaska Department of Fish and Game (ADFG), which would establish a new predator control program targeting 80% of the wolves in 8,000 square miles of Unit 21E (Proposal 239) -- even though they have no reliable data on how many wolves are in the area. The ADFG simply cannot claim that predator control is justified or assert that state personnel will not shoot 20% of the wolves if they don't know how many wolves are there to begin with.

**Proposals 235 and 236**, which would extend the predator control program in Unit 19A by six years and in Unit 19D (East) by five years, respectively. Neither program has ever been scientifically justified, and if the Board votes to continue them, it should conduct the studies necessary to prove that wolf predation is the main limiting factor for moose.

**Proposal 190**, which the ADFG has put forward to allow state personnel to use carbon monoxide bombs to kill wolf pups in their dens. As you know, denning in general is incredibly unpopular with Alaskans and using poisonous gas in order to conduct denning will most certainly be met with public outrage.

I would also like to express my support for several proposals which will have positive impact on Alaska wildlife and the wildlife-viewing public. Please VOTE YES on the following:

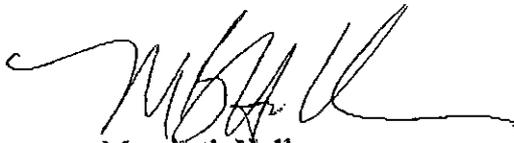
**Proposals 22 and 27 - end lynx and wolverine trapping in Chugach State Park**

**Proposals 43, 44, 45, 51, 77, 78 and 174 - decrease the harvest of brown bears in Katmai, Lake Clark, Wrangell St. Elias and Denali National Preserves and close the brown bear hunting season where McNeil River bears can be found after leaving the falls in the autumn.**

**Proposal 224 - calls for the Board of Game to continue to protect white-colored bears, which are extremely rare, provide viewing benefits to Alaskans and tourists alike, and are of spiritual significance to many Alaskans.**

As a 25-year Alaskan, I strongly support a balanced, science-based wildlife management program that takes into account all the ways that we Alaskans benefit from our wildlife.

Thank you for this opportunity to comment. I hope that you will consider my views carefully, and that you will keep in mind that a responsible Board of Game will balance the needs and interests of all Alaskans, for now and into the future.



Marybeth Holleman

Anchorage, AK

RECEIVED  
FEB 13 2009  
BOARD



**Reno Sommerhalder**  
P.O. Box 853, Banff, Alberta, T1L 1A8 Canada  
Tel: 403 762 0361 E-mail:reno@bearsociety.org

---

February 13, 2009

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

To Whom It May Concern

**Re:** In Support of PROPOSAL 43 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Close brown bear hunting in a portion of Unit 9C as follows:  
Funnel Creek, Moraine Creek, and Battle Creek

Dear Members of the Board,

Please accept this letter that states the support of proposal number 43 – 5 AAC 85.020.

I am opposed to any hunting of brown bears within Unit 9C in Katmai National Park and Preserve.

Most of these bears are highly habituated to the presence of people and a hunt of these bears is not only unethical but the high quota set for this unit does not support a sustainable take.

The future of this place belongs to bears and people that can co-exist peacefully. Bear viewing and wildlife watching industries far outweigh in many cases economic income, when compared to trophy hunting of the same animals.

Please do the right thing and close this controversial hunt once and for all.

Sincerely,  
Reno Sommerhalder

RECEIVED  
FEB 13 2009  
BOARDS

February 12, 2009

To:

Alaska Board of Game, comments regarding proposed regulation changes to be considered at the February 27 to March 9, 2009 meeting in Anchorage:

From:

Dan Dunaway  
PO Box 1490  
Dillingham, Alaska 99576  
907-842-2636

I was recently elected to the Nushagak Advisory Committee and sit on the Federal Bristol Bay Rural Advisory Council. In addition, I am a Hunter Safety Instructor certified by ADFG. However, the comments I present here are strictly my own and do not represent any other group but myself.

I fully support the Nushagak AC's positions on the proposals as will be presented to you by our chairman. My comments are offered as additional information to consider.

**Proposal 244**, prohibitions or restrictions on the use of full metal jacketed bullets and calibers (bullet diameters) for big game.

**I oppose this proposal.** While I sympathize with the concerns this proposal addresses and generally think it is a very poor practice to use full metal jacketed bullets for most big game especially in .223 caliber, I think this issue deserves more time and much more public education and discussion before any regulatory changes are adopted. I especially think more discussion is necessary if the proposal has been expanded for the whole state and for all calibers.

A concerted public education effort might be less onerous and get more acceptance. I know the hunter education programs put efforts into this issue.

- 1) Is there a documented biological problem? How big is it? Is it a statewide problem?
- 2) How enforceable will any such regulation be? Compliance in western Alaska could be a problem for quite a while.
- 3) The proposal author states: "most bullets" [loaded cartridges?] "available to the public as FMJ are in 223 caliber" is very wrong. There are many many choices of bullets in the 223 (actually usually .224 inch diameter) in the wide range of cartridges from the 22 Hornet, .221 and .222 Remingtons to 22-250, 220 Swift. Is the author specifically addressing the cartridge

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Dan Dunaway  
Comments to BOG  
Proposal 244

page 1 of 3

Public Comment # 31

known as the .223 Remington / 5.56 NATO or all cartridges that fire .223/.224 inch diameter projectiles?

Some hunters select the FMJ bullets in 223 Rem because the bullets penetrate big game better - and yes the ammo is often much cheaper. It is fair to say that effectiveness is erratic and the potential to lose animals is likely higher than for hunters using larger calibers loaded with bullets of "controlled expansion" designs. However most other bullets available in the 223 Rem are designed as varmint and very small game bullets; the expanding bullets are very fragile to expand on light weight animals and may "blow up" on the surface of big game leaving a nasty nonleathal wound that allows game to escape and die. I have also seen soft point ammunition used in a .222 Rem magnum ( basically the same as a .223 Rem) that effectively put down average caribou with one well placed shot.

Bullet technology for .223 /.224 caliber ammunition has changed dramatically with solid copper alloy bullets, heavier (60 to 70 grain bullets), some designed specifically for deer and other medium big game use. It is my impression that use of .223 Rem, 22-250, .220 Swift and similar cartridges for deer is an increasingly common and effective practice were legal in the United States.

4) I think Alaska has been wise to not get into the mire seen in other states that over regulate the caliber, energy, or projectile selection. I think it leads to confusion and in some cases ridiculous inconsistencies - say allowing underpowered rifles but prohibiting sufficiently powerful handguns. Or allowing "underpowered" but large diameter cartridges but prohibiting small diameter but sufficiently powered rifle cartridges. And there is such a myriad of cartridges now, many ammunition makers that now offer higher power, more effective bullets for cartridges once considered under powered ( Corbon, Buffalo Bore, Garrett <http://www.garrettcartridges.com/products.asp> ).

5) Full metal jacketed bullets are used by some hunters for taking animals for their fur, to minimize pelt damage. For that reason I think wolves and wolverines should be excluded if an FMJ prohibition is adopted.

6) What constitutes a full metal jacketed bullet? The technology for bullets is changing very rapidly these days and bullets are taking many forms using many different materials. Barnes and Nosler, probably others very soon, make bullets of solid bronze or copper alloys. How will these bullets be viewed under any regulation? Some are made to expand and some are not. Some, nonexpanding bullets in 30 caliber and larger are designed for game, especially dangerous game.

The Barnes Banded Solid is a very blunt solid copper alloy bullet in calibers from .223 or .224 to .618 caliber. The company states they are designed for fur taking and dangerous game. Other brands have very similar designs and purposes. Every bear season I find a number of such bullets in the bullet stop of our range. I can only conclude that some hunters desire to

carry such bullets to stop bears. On occasion, I have carried a few 30 cal full metal jacket bullets for this very purpose though I have never fired them at a bear or other game.

Barnes solid website: <http://www.barnesbullets.com/products/rifle/banded-solids/>

Nolser Solids (.375 to .458) <http://www.nosler.com/?p=11&b=5&s=153>

Hornady makes FMJ bullets for taking fur animals.

Corbon makes loaded ammunition with flat point solid ammunition designed for hunting - all in larger calibers of 44 magnum, 45-70 and so on:

<http://www.dakotaammo.net/products/corbon/hunter.htm>

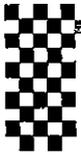
7) If you choose to broaden the regulation to all calibers and do not define the bullet as full metal jacket, I suggest you be extremely careful if you choose language describing a non-expanding bullet. Some of the ammunition and bullet makers I have already mentioned have very effective, non-expanding bullets specifically designed for big game hunting. Such ammunition is most commonly the very large diameter ammunition / bullets starting about 35 caliber and most common in the 40 cal and larger rifles such as 44 Rem Magnum, 444 marlin, 45-70, and bigger. But it could also prohibit the use of some very effective commercial and home made cast lead bullets in a wide variety of cartridges from 357 magnum handgun and rifle ammunition to 30-06, 308 and other very common, popular, and effective cartridge choices. You can see the mire that may be created.

I occasionally cast bullets and have hunted big game with them though I have never shot a big game animal. I believe they can be an ethical and effective choice and would like to continue to have that opportunity.

8) Hand guns: Hand gun hunting for big game has become quite popular. If the BOG chooses to address rifle cartridge size and bullet design, will big game handgun hunting be addressed as well? I have done a bit of handgun hunting and took 1 caribou with a 41 magnum using heavy flat nosed nonexpanding cast lead bullets in ammunition made by Corbon. I carry the same ammunition for self defense in bear country. I hope I can continue to do so. I hope Alaska doesn't get bogged down in a bunch of regulations regarding bullet design, diameter, or power regulations.

Many many big game handgun hunters use heavy solid copper alloy or lead alloy blunt nosed bullets for their hunting and believe such ammunition is the best choice. Examples of such ammunition in commercial production are made by Corbon mentioned above, Federal , Buffalo Bore, (<http://www.buffalobore.com/ammunition/photos.htm> ), Garrett, SSK, Alaska Backpacker, Alaska Bulletsmith, to name a few.

Thank you for your consideration.



**February 13, 2009**

**ATTN: BOG COMMENTS  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907 465-6094**

**Re: Sheep Proposal #218**

**Proposal 218 would give Alaskan residents a few days in the field without being crowded by nonresident sheep hunters. I strongly support Proposal 218.**

**John Giuchici  
118 Dunbar Avenue  
Fairbanks, AK 99701**

RECEIVED TIME FEB. 13. 1:27PM

Public Comment # 32

February 12, 2009

To whom it may Concern.

In regards to Fish and Game entertaining the notion of prohibiting the harvest of Light color phased Black Bears. I am under the impression that Alaska State Fish and Game made game management decisions based on factual scientific information. Why is Fish and Game entertaining the thought of implementing restrictions on black bear, based off of an emotionally driven agenda, an agenda that got started because of a trash bear. White, blonde, grey, cinnamon, and black color phase are all North American black bear.

Part of Fish and Game is to ensure sustainability and harvestable surplus of fish and wildlife resources. If game is managed well enough to sustain an annual hunting season would not that population be sustained enough for wild life viewing?

There would be a large risk to hunters, not being able to tell the difference between color phases. Color phases are usually not consistent through the entire pelt. There are a lot of what ifs. What if the bear is wet and the pelt is darker, what if the bear is in thick brush, and you only see part of the pelt, what if the lighting is different and the pelt looks darker?

If you push for more restrictions on black bear, you are opening up hunters to more liability, in such a case you are discouraging the already low number of black bears harvested in the Skagway area. In turn I believe you will have more of a public safety issue than you do now.

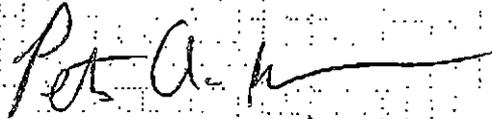
I strongly urge you to stick to scientific facts. The State has done a great job in managing fish and game, and I would hate to see that change.

Sincerely, Luke Rauscher



ARCHITECTURE • ENGINEERING • LAND SURVEYING • PLANNING  
Anchorage Fairbanks Juneau Wasilla

I Support Proposal # 128

Pete A. 

Pete Jacobsen

2810 Montevideo Road

Fairbanks, AK 99709

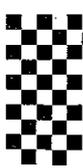
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Public Comment # 34



# NORTH AMERICAN BEAR CENTER

**Board of Directors:**

- Joseph Edlund, Vice Chair
- Paul Forsman, Chairman Emeritus
- Nancy Krause, Secretary
- Susan Mansfield, Treasurer
- Donna (Phelan) Andrews
- Lynn Rogers, Chair

**Staff:**

- Donna (Phelan) Andrews, Managing Director/ Bear Curator
- Sharon Herrell, Program Director
- Sharon Johnson, Associate Director
- Nancy Krause, Membership Director
- Susan Mansfield, M.S., Webmaster/Biologist
- Peggy Meisch, Accounting
- Donna Rogers, Finance Committee
- Lynn Rogers, Ph.D., Biologist
- David Seiberlich, School Liaison

**International Advisory Board:**

- Larry Anderson, DVM, Personnel Adviser
- Richard Anderson, Bear Hunting Safety Instructor, MN DNR, retired
- Rainer Brocke, Ph.D., Wildlife Prof., State University of NY, Syracuse
- William Campbell, Atty., Ely, MN
- Earl Day, First Nations Councilman
- Jane Goodall, Ph.D., CBE, UN Messenger of Peace
- Douglas Hajjcek, Exhibit Adviser
- Randy Herrell, Exhibit Adviser
- Sharon Herrell, Exhibit Adviser
- Todd Hoffman, Hoffman Constr. Co.
- Rob Laidlaw, ZooCheck Canada
- Charles Meyer, Personnel Adviser
- Charles Novak, Mayor of Ely, retired
- Gustav Peters, Ph.D., Researcher Koenig Research Inst., Germany
- Roger Powell, Ph.D., Wildlife Prof., North Carolina State University
- Ellen D. Reeder, Ph.D., Museum consultant, Art adviser
- Will Steger, Polar Explorer, Ely, MN
- Nancy Jo Tubbs, Chair Int'l Wolf Center, Ely, Minnesota
- Nick Wognum, Editor, Ely Echo

**Veterinary Medical Advisor**  
Richard "Chip" Hanson, DVM,

**Independent Auditor**  
Walker, Giroux, & Hahn, Ltd.

To: Whom it may concern

From: Lynn Rogers, Director, North American Bear Center

Date: February 11, 2009

Re: **Support for PROPOSAL 43 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Close brown bear hunting in a portion of Unit 9C as follows: Funnel Creek, Moraine Creek, and Battle Creek

This is a letter in support of the above referenced proposal.

I have conducted bear research for the University of Minnesota, Wildlife Research Institute, and the United States Forest Service for 42 years. I worked with the Minnesota Department of Natural Resources and the Minnesota State Legislature to elevate bears to big game status in Minnesota. I wrote the initial bear hunting regulations for Minnesota. I support hunting but do not consider shooting bears in Katmai Preserve to be hunting. It casts a horrible shadow on hunters and is detrimental to bear viewing.

I have been guiding bear viewers to Alaska since 1996, and the idea of hunters unethically shooting the same trusting bears that the viewers are watching makes viewers furious. Maybe you have heard from some of them. People can hunt all over Alaska, but Katmai is special. It is a world class wildlife opportunity, and income from viewing those bears supports a lot of jobs. There is no good reason to kill that golden goose, and there are many reasons to stop this unethical "hunt."

Please protect the bears in 9C.

Lynn Rogers, Ph.D.  
Wildlife Research Biologist  
Director, North American Bear Center  
Founder, Wildlife Research Institute  
1482 Trygg Road  
Ely, MN 55731  
218-365-4480  
[lrogers@bearstudy.org](mailto:lrogers@bearstudy.org)  
[www.bear.org](http://www.bear.org)

February 11, 2009

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

(907) 465-4110

(907) 465-6094 FAX

I am writing in support of Board of Game Proposal No. 118 that would close the season on cranes in Homer. As a frequent visitor to Homer, I have come to enjoy seeing the cranes. Many nest in rural yards and become almost part of the community. The numbers of cranes seem to dwindle a bit each season. They have many other predations to which they must adapt - hunting should certainly not be one of them! If anything, the state should do more to promote safe habitats for the cranes.

Please do the right thing and pass Board of Game Proposal No. 118 and close crane season forever in Homer!

Sincerely



William E. Erickson

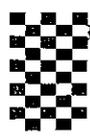
52 Old Studio Road

New Canaan, CT 06840

Public Comment #

36





12 February 2009

ATTN: BOG COMMENTS

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

**PROPOSAL 140 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Open a general hunt for brown bear in Unit 15 as follows: Open season for brown bears in Unit 15 to harvest bag limit of one brown bear per every four years with this season beginning October 1 through November 30.**

**Oppose**

According to ADFG biologist Jeff Selinger there is only anecdotal data suggesting an increase in bear populations. Education and active management of humans in bear country will reduce DLPs, not trophy hunting bears in remote parts of the peninsula. Cooper Landing, Kenai, Sterling ect... has a human problem (unprotected garbage, uneducated, paranoid people with firearms) not an overpopulation of bears. Bear hunting will compound already very high human-caused mortality to what "might be" a healthy, or recovering, brown bear population. A Unit 15 bear harvest in 2008 did not reduce the growing DLP numbers on the Kenai. Trophy hunts do not target problem bears in the communities, education and enforcement of regulations (bear proof garbage cans, electric fences, bear safety) does. **I would however support a "micromanaged" hunt , if properly directed, to harvest only specific bears that would otherwise become DLP's, in the plan that has been worked out in detail by Selinger/ADFG..**

We are very lucky to have a population of brown bears on the Kenai. This is a valuable resource, lets invest in it wisely.

Brad Josephs  
Bear viewing Guide, Homer, Alaska  
Bs Wildlife Biology, UAF  
Po Box 3481 Homer, Alaska 99603 (907)235-7839

bears do not fear humans because they are not hunted. Which bears are more dangerous; Kodiak (hunted) or Katmai (not hunted)?

Hunting bears will also decrease the ability of wildlife watchers to observe and photograph bears as their fear of humans grows.

**I would however support a "micromanaged" hunt , if properly directed, to harvest bears only specific bears that would otherwise become DLP's, an idea that has already been worked out in detail by Selinger/ADFG.**

Brad Josephs  
Bear viewing Guide, Homer, Alaska  
RECEIVED TIME FEB. 13. 1:12PM

Public Comment # 37

12 February 2009

ATTN: BOG COMMENTS

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

**PROPOSAL 44 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Modify this regulation to 36 provide the following: Remainder of Unit 9C: 1 bear every four years by drawing permit only.**

#### SUPPORT

I have made my living as a naturalist bear viewing guide in Katmai National park for the past 11 years. I strongly suggest that the board of game become more proactive in preserving the bear viewing resource that helps to diversify the economies of Kenai and Alaska Peninsula and Kodiak communities.

The current harvest numbers on the preserve, ranging between 25-35 bears/year is simply too high. Unregulated harvest levels has and will continue to deplete the bear populations of Katmai National Park and McNeil River. The migration of bears between these areas is not studied, and not reflected in harvest surveys. It is simply not worth risking this very valuable population of bears. This harvest results in a great number of sows killed for trophy, which are far more valuable alive than dead. Katmai Preserve bears should be heavily managed for high density, and many believe current harvest regulations are not.

The Katmai Preserve is a habitat where a great number of bears, especially sows and cubs, migrate in the fall from McNeil and Katmai national Park to take advantage of late season salmon runs and berries which provide the last food source before winter. During summers of fish/salmon berry shortage on the coast, the numbers of migrating bears increase, which can skew population surveys, and boost harvest numbers. This is a serious population sink for the most valuable bears on earth.

I was shocked at the unethical nature of this "harvest" when I witnessed it first hand in 2007 while assisting a film crew. The obvious majority voiced their concerns over this hunt. No one, save a few hunters who cherish a very easy hunt, supports hunting in 9C. Please stop this over harvest. The bear viewing opportunities here are a world wildlife treasure, and should be treated as such. Watchable wildlife is the way of the future, please invest wisely in this extremely valuable resource.

Brad Josephs  
Bear viewing Guide, Homer, Alaska  
Bs Wildlife Biology, UAF  
Po Box 3481 Homer, Alaska 99603 (907)235-7839

RECEIVED TIME FEB. 13. 1:12PM

Public Comment # 39

12 February 2009

ATTN: BOG COMMENTS  
Alaska Department of Fish and Game

Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-465-6094

**PROPOSAL 139 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Increase the number of brown bear permits to be issued for Unit 15.**

**oppose**

Having listened to a review of Kenai Peninsula bear data by Jeff Selinger and Larry Lewis, it seems obvious that data does not exist to support the assumption that Kenai brown bears are at carrying capacity. Data is clear that education of people in certain residential and recreational areas does help decrease DLPs. As Jeff stated "seventy-five percent of our (dead) bears are garbage bears." Harvesting mature bears in remote areas through hunting will not solve the problem. Increased education of bear awareness (ie. use of bear proof food containers, electric fences, non lethal bear deterrents) will solve the problem, decrease DLPs and make the country safer for users. I speak for many Kenai Peninsula residents who enjoy living in bear country who still believe that Kenai brown bears are a species of concern. I urge you not to use anecdotal data to support a decrease in Kenai bear numbers until we have exhausted other methods to stop DLPs, and can support, through scientific data, that bear numbers are at or over carrying capacity.

I fear that allowing more harvest will simply compound the already high human-caused mortality numbers, and rob the peninsula of what might be a healthy bear population. I do not believe sport harvest of bears will make the country safer for humans because I feel that hunted bears are more dangerous, as most attacks result from surprising bears who fear humans. Bears and humans have no conflicts at McNeil River and Katmai National Park because bears do not associate people with food, and bears do not fear humans because they are not hunted. Which bears are more dangerous; Kodiak (hunted) or Katmai (not hunted)?

Hunting bears will also decrease the ability of wildlife watchers to observe and photograph bears as their fear of humans grows.

**I would however support a "micromanaged" hunt, if properly directed, to harvest bears only specific bears that would otherwise become DLP's, an idea that has already been worked out in detail by Selinger/ADFG.**

Brad Josephs  
Bear viewing Guide, Homer, Alaska  
Bs Wildlife Biology, UAF  
Po Box 3481 Homer, Alaska 99603 (907)235-7839

Public Comment #

**37**

RECEIVED TIME FEB. 13. 1:12PM

**PROPOSAL 42 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Delay the brown bear hunting season in Unit 9C as follows:**

**Delay opening of the brown bear hunting season until October 15 rather than the current date of October 1 in the Katmai Preserve (UCUs 0703 and 0702) of Unit 9C.**

#### SUPPORT

Rolling back the fall hunt would benefit all user groups to 9c, as hunters would have a higher proportion of mature males to hunt, and fishermen/bear viewers can safely visit region during early October. Everyone will benefit from increased bear populations as less sows will be harvested.

The Katmai Preserve is an extremely important habitat for coastal brown bears of Katmai National Park and McNeil River, especially during September and October as the late season salmon runs and berries provide food sources when the coastal habitat food sources become unavailable. The current fall hunt acts as a population sink which many believe threatens bear populations from adjacent protected populations. Rolling back the season 2 weeks would mitigate this damage somewhat.

Having seen this area on September 31/OCT 1 2007, we saw only single females and females w/cubs. We witnessed the harvest of several single female bears by trophy hunters. Studies by biologists (Farley, Kenai Peninsula) have shown how dependent bear populations are on cub recruitment from a small percentage of successful females. Harvesting only several successful females can have extremely detrimental effects on the bear population. If the hunting season was rolled back, many of these females would have left the area, leaving trophy boars for harvest which den up last. Early October is a very popular time in 9c for sport fishermen, and potentially bear viewers/wildlife photographers. These user groups must evacuate the area prior to the hunt, as region becomes very dangerous because of gunfire and wounded bears.

Brad Josephs  
Bear viewing Guide, Homer, Alaska  
Bs Wildlife Biology, UAF  
Po Box 3481 Homer, Alaska 99603 (907)235-7839

Brad Long Josephs Po Box 3481 Homer, Alaska 99603 (907)235-7839

# STATE OF ALASKA

## DEPARTMENT OF NATURAL RESOURCES

### DIVISION OF PARKS AND OUTDOOR RECREATION

SARAH PALIN, Governor

550 W. 7<sup>th</sup> AVENUE, SUITE 1380  
ANCHORAGE, ALASKA 99501-3561

PHONE: (907) 269-8700  
FAX: (907) 269-8907

February 13, 2009

Alaska Board of Game  
Alaska Department of Fish & Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Dear Alaska Board of Game:

The following written comments are submitted for your consideration regarding some of the proposals submitted that change hunting and trapping regulations affecting Chugach State Park and are scheduled to come before you at the spring 2009 meeting. These recommendations are listed by the specific proposal numbers assigned in your spring 2009 Proposal Book for Southcentral and Southwest Regions. These comments are only meant to address those portions of the proposals that directly affect Chugach State Park.

**Proposal # 1: Hunting seasons and bag limits for brown bear.** Expand seasons and bag limits for brown bear in Unit 14C.

**Recommendation: Do Not Adopt:** Strongly oppose. Adoption of this proposal would create a conflict between existing park regulations (11AAC 20.010) which prohibit the discharge of a weapon in portions of the park that would be indicated as open to hunting with adoption of this proposal. This would create confusion for the public. In addition, due to the year round high public use of those areas where discharge of a weapon is currently prohibited by regulation, the Division of Parks and Outdoor Recreation (DOPR) does not intend to modify discharge regulations in this area. Note - adoption of Proposals #2 & #3 would accommodate all of proposal #1 except that portion where conflict of regulations would occur.

**Proposal # 2: Hunting seasons and bag limits for brown bear.** Add upper Eagle River drainage to the area where brown bears may be hunted with a drawing permit in the Chugach State Park Management Area in Unit 14C, and open a fall season.

**Recommendation: Adopt:** Note - adoption of Proposals #2 & #3 would accommodate all of proposal #1 except that portion where conflict of regulations would occur.

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Public Comment #

**38**

**Proposal # 3: Hunting seasons and bag limits for brown bear.** Open that portion of Eklutna Lake Management area within Chugach State Park for brown bear hunting by bow and arrow only.

**Recommendation: *Adopt:*** Note - adoption of Proposals #2 & #3 would accommodate all of proposal #1 except that portion where conflict of regulations would occur.

**Proposal # 4: Hunting seasons and bag limits for goat.** Open a registration hunt in Unit 14C.

**Recommendation: *Do Not Adopt:*** It is not clear in the proposal where specifically the proposed open registration hunt would be authorized. If the proposal was meant to include portions of the park, Chugach State Park portions should be excluded from any open registration hunt for goat within Unit 14C. The drawing permit hunts for goats within Chugach State Park should remain as it currently exists. Current regulations are working well, manageable and prevent overharvest.

**Proposal # 5: Hunting seasons and bag limits for moose.** Increase available moose tags in the Anchorage Management Area of 14C and increase the hunt area as allows.

**Recommendation: *Do Not Adopt:*** Strongly oppose. Hunting in the most populated portions of Chugach State Park is a serious safety concern. Expansion of the existing regulations by increasing the footprint of the hunt area, setting a minimum of 20 permits, and including at least one "any-bull" permit will exacerbate an already dangerous situation. This is especially of concern due to the large number of locals and international visitors that go to these specific portions of the park to view and photograph, from close distances, the easily accessible large game animals renowned to inhabit the park. It is not uncommon to actually stumble upon foreign tourist concealed in camouflage on the hillside to photograph trophy moose.

**Proposal # 8: Hunting seasons and bag limits for moose.** Re-authorize the antlerless moose season in the Anchorage Management Area in Unit 14(C).

**Recommendation: *Adopt:*** This proposal is believed to offer the best way to address ADF&G carrying capacity concerns for the area.

**Proposal # 11: Hunting seasons and bag limits for moose.** Re-authorize the antlerless portion of the any-moose drawing permit in the upper Ship Creek drainage in Unit 14(C).

**Recommendation: *Adopt:*** This proposal is believed to offer the best way to address ADF&G carrying capacity concerns for the area.

**Proposal # 24, 26, 27 & 28: Areas Closed to trapping.** Close wolverine trapping in the Chugach State Park Management Area in Unit 14C.

**Recommendation: *Adopt:*** Strongly Support. Each of the above listed proposals seeks to close Chugach State Park to trapping of wolverine. Proposal 24 is from the Chugach State Park Advisory Board and Proposal 27 is a joint Dept of Fish & Game and Dept of Natural Resources proposal.

Adoption would improve visitor and pet safety, improve wolverine viewing opportunities, and protect the wolverines from overharvesting. Providing safe opportunities for outdoor recreation for visitors and their pets is a high priority for parks. When parks are perceived as unsafe for users or their pets they are less inclined to use the public land. Adoption of this proposal would reduce the potential for overharvest and at the same time provide critical sanctuary habitat helping to maintain a healthy regional population.

The overwhelming majority of the substantial public response expressed when the park was opened to wolverine trapping favored allocating this resource for viewing opportunities rather than harvest by trapping. Given the low density distribution of this species, the scarcity aspect of their population significantly elevates their "value" as a viewed organism. In addition, those concerned about traversing areas where large box traps may be set would not have to alter their use of the park. The handful of trappers who target wolverines in the park would be displaced; however, they would still be able to harvest wolverines nearby and outside the park boundary in the Remainder Unit 14C and Birchwood Management Areas.

Thank you for your consideration of these comments and please don't hesitate to contact me if you have any questions regarding the Division's position with respect to any proposal.

Respectfully,



James King  
Director, Division of Parks and Outdoor Recreation

# STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

**DIVISION OF PARKS AND OUTDOOR RECREATION**

**SARAH PALIN, GOVERNOR**

**MAT-SU/COPPER BASIN AREA**

HC 32 BOX 6706

WASILLA, ALASKA 99654

PHONE: 907-745-3975

FAX: 907-745-0938

February 13, 2009

Dear Members of the Alaska Department of Fish and Game, Board of Game,

The Division of Parks and Outdoor Recreation, Mat-Su/Copper Basin Area, wishes to comment on Proposal 114 by the Board of Game. A portion of the potentially affected area is within lands managed by the Division of Parks and Outdoor Recreation within Denali State Park or lands managed under the Denali State Park Management Plan, which include the Indian River, Blair Lake, and Tokositna State Recreation Areas.

**PROPOSAL 114 – 5 AAC 92.125(c). Predation control areas implementation plans.** Modify the predator control area boundary for Unit 13E as follows: Move the boundary below the Gold Creek bridge on the Susitna River to the mouth of the Talkeetna River to the west bank of the Susitna River instead of the railroad tracks as the boundary for that portion of 13E is presently.

**ISSUE:** Present boundary below the Gold Creek bridge being the Alaska railroad denies hunting access to the Susitna River. The river bed is the only ski access for planes as from the railroad east is all heavy timber and cannot be hunted.

The Division of Parks and Outdoor Recreation **strongly object** to the proposed movement of this boundary in GMU 13. The Gold Creek Bridge area mentioned in the proposal is a portion of Denali State Park or lands managed under the Denali State Park Management Plan. The Denali State Park boundary to the east, is the Alaska Railroad. The Susitna River is closed to the landing of aircraft by Alaska State Park regulation:

**11 AAC 20.410 AIRCRAFT:** (a) The use of fixed wing aircraft is allowed in Denali State Park west of the Parks Highway and on Blair and Ermine Lakes.

(b) Practice landings are not allowed.

(c) A person may land a helicopter in Denali State Park if authorized by the director under 11 AAC 18.010.GMU 13.

Denali State Park should not be included within a predation control area. Opportunities for the public to view wildlife within lands managed by the Division are a primary reason for the parks protection of natural resources. The Division wishes to ensure that the visiting public has an opportunity to view wildlife in its natural environment. If passed the public will have a diminished opportunity to observe bears, as Denali State Park is an easily accessed prime habitat for brown and black bears.

Ranger John Wilber  
Alaska State Parks  
HC32 Box 6706  
Wasilla, AK 99654  
907-495-6210

Public Comment # 38

# STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF PARKS AND OUTDOOR RECREATION

SARAH PALIN, GOVERNOR

MAT-SU/COPPER BASIN AREA

HC 32 BOX 6706

WASILLA, ALASKA 99654

PHONE: 907-745-3975

FAX: 907-745-0938

February 13, 2009

Dear Members of the Alaska Department of Fish and Game, Board of Game,

The Division of Parks and Outdoor Recreation, Mat-Su/Copper Basin Area, wishes to comment on Proposal 75 by the Board of Game. A portion of the potentially affected area is within lands managed by the Division of Parks and Outdoor Recreation within Denali State Park or lands managed under the Denali State Park Management Plan, which include the Indian River, Blair Lake, and Tokositna State Recreation Areas.

**PROPOSAL 75 - 5 AAC 92.085(4). Unlawful methods of taking big game; exceptions; 92.115. Control of predation by bears; and 92.125(c). Predation Control Areas Implementation Plans.**

Modify the regulations to allow the issuance of permits as follows: Permits will be issued to take grizzly/brown bear in Unit 13A, B, C, and E within the predator (wolf) control program area for the purposes of predation control. The permitted may choose to use bait to take brown bears. Basically the same verbiage as found in the 2007-2008 Alaska Bear and Wolf Control Supplement for Unit 19D black and brown bear control area. **92.085(4). Unlawful methods of taking big game; exceptions:** The following methods and means of taking big game Proposal 75 are prohibited (4) with the use of bait for ungulates and **with the use of bait or scent lures for any bear**, except that black bears may be taken with the use of bait or scent lures as authorized by a permit issued under 5 AAC 92.044.

The Division of Parks and Outdoor Recreation has no objections to changing the methods the bear harvesting in GMU 13E. The Division wishes to ensure that if passed the public is made aware that a portion of this GMU is within Denali State Park or lands managed under the Denali State Park Management Plan are closed to bear baiting.

Ranger John Wilber  
Alaska State Parks  
HC32 Box 6706  
Wasilla, AK 99654  
907-495-6210

Public Comment # 38

# STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF PARKS AND OUTDOOR RECREATION

SARAH PALIN, GOVERNOR

MAT-SU/COPPER BASIN AREA  
HC 32 BOX 6706  
WASILLA, ALASKA 99654  
PHONE: 907-745-3975  
FAX: 907-745-0938

February 13, 2009

Dear Members of the Alaska Department of Fish and Game, Board of Game,

The Division of Parks and Outdoor Recreation, Mat-Su/Copper Basin Area, wishes to comment on Proposal 73 by the Board of Game. A portion of the potentially affected area is within lands managed by the Division of Parks and Outdoor Recreation within Denali State Park or lands managed under the Denali State Park Management Plan, which include the Indian River, Blair Lake, and Tokositna State Recreation Areas.

**PROPOSAL 73 - 5 AAC 85.015. Hunting seasons and bag limits for black bear.** Lengthen the black bear season in Unit 13E as follows:

Residents and Nonresidents: Extend black bear baiting to April 15 to June 30.

The Division of Parks and Outdoor Recreation has no objections to lengthen the bear season in GMU 13E. The Division wishes to ensure that if passed the public is made aware that a portion of this GMU is within Denali State Park or lands managed under the Denali State Park Management Plan are closed to bear baiting.

Ranger John Wilber  
Alaska State Parks  
HC32 Box 6706  
Wasilla, AK 99654  
907-495-6210

Public Comment #

38

# STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF PARKS AND OUTDOOR RECREATION

SARAH PALIN, GOVERNOR

MAT-SU/COPPER BASIN AREA

HC 32 BOX 6706

WASILLA, ALASKA 99654

PHONE: 907-745-3975

FAX: 907-745-0938

February 13, 2009

Dear Members of the Alaska Department of Fish and Game, Board of Game,

The Division of Parks and Outdoor Recreation, Mat-Su/Copper Basin Area, wishes to comment on Proposal 76 by the Board of Game. A portion of the potentially affected area is within lands managed by the Division of Parks and Outdoor Recreation within Denali State Park or lands managed under the Denali State Park Management Plan, which include the Indian River, Blair Lake, and Tokositna State Recreation Areas.

**PROPOSAL 76 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear; and 92.132.**

**Bag limit for brown bears.** Increase the bag limit in Unit 13E as follows:

Increase the bag limit for brown bear to two every regulatory year in Unit 13E.

The Division of Parks and Outdoor Recreation **strongly object** to the proposed increase in bag limit for brown bear in GMU 13E that is within Denali State Park or lands managed under the Denali State Park Management Plan. Opportunities for the public to view wildlife within lands managed by the Division are a primary reason for the parks protection of natural resources. The Division wishes to ensure that the visiting public has an opportunity to view wildlife in its natural environment. If passed the public will have a diminished opportunity to observe brown bears, as Denali State Park is an easily accessed prime habitat for brown bear.

Ranger John Wilber  
Alaska State Parks  
HC32 Box 6706  
Wasilla, AK 99654  
907-495-6210

Public Comment #

38

# STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF PARKS AND OUTDOOR RECREATION

SARAH PALIN, GOVERNOR

MAT-SU/COPPER BASIN AREA  
HC 32 BOX 6706  
WASILLA, ALASKA 99854  
PHONE: 907-745-3975  
FAX: 907-745-0938

February 13, 2009

Dear Members of the Alaska Department of Fish and Game, Board of Game,

The Division of Parks and Outdoor Recreation, Mat-Su/Copper Basin Area, wishes to comment on Proposal 74 by the Board of Game. A portion of the potentially affected area is within lands managed by the Division of Parks and Outdoor Recreation within Denali State Park or lands managed under the Denali State Park Management Plan which include the Indian River, Blair Lake, and Tokositna State Recreation Areas.

**PROPOSAL 74 - 5 AAC 85.015. Hunting seasons and bag limits for black bear; and 92.044. Permit for hunting black bear with the use of bait or scent lures.** Extend the bear baiting season in Units 11 and 13 as follows:

Units 11 and 13 black bear baiting season - [APRIL 15- JUNE 15] **April 15-June 30.**

**ISSUE:** Units 11 and 13 have abundant black bear populations and climate similar to Interior Region Units. All interior units have bear baiting seasons that end June 30. Climate, bear populations, and hunter pressure are much more similar to interior-units than the coastal areas with which they share June 15 baiting closures.

The Division of Parks and Outdoor Recreation has no objections to extending the bear baiting season in GMU 13. The Division wishes to ensure that if passed the public is made aware that a portion of this GMU is within Denali State Park or lands managed under the Denali State Park Management Plan is closed to bear baiting.

Ranger John Wilber  
Alaska State Parks  
HC32 Box 6706  
Wasilla, AK 99654  
907-495-6210

Public Comment #

38

# STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF PARKS AND OUTDOOR RECREATION

SARAH PALIN, GOVERNOR

MAT-SU/COPPER BASIN AREA

HC 32 BOX 6706

WASILLA, ALASKA 99654

PHONE: 907-745-3975

FAX: 907-745-0938

February 13, 2009

Dear Members of the Alaska Department of Fish and Game, Board of Game,

The Division of Parks and Outdoor Recreation, Mat-Su/Copper Basin Area, wishes to comment on Proposal 79 by the Board of Game. A portion of the potentially affected area is within lands managed by the Division of Parks and Outdoor Recreation within Denali State Park or lands managed under the Denali State Park Management Plan, which include the Indian River, Blair Lake, and Tokositna State Recreation Areas.

**PROPOSAL 79 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear, and 92.132.**

**Bag limit for brown bears.** Increase the bag limit for brown bear in Unit 13 as follows.

Allow the harvest of two brown/grizzly bear every regulatory year for Unit 13. It will not count against the bag limit in anywhere else in the state.

The Division of Parks and Outdoor Recreation **strongly object** to the proposed increase in bag limit for brown bear in GMU 13. A portion of Denali State Park or lands managed under the Denali State Park Management Plan is within GMU 13. Opportunities for the public to view wildlife within lands managed by the Division are a primary reason for the parks protection of natural resources. The Division wishes to ensure that the visiting public has an opportunity to view wildlife in its natural environment. If passed the public will have a diminished opportunity to observe brown bears, as Denali State Park is an easily accessed prime habitat for brown bear.

Ranger John Wilber  
Alaska State Parks  
HC32 Box 6706  
Wasilla, AK 99654  
907-495-6210

Public Comment #

**38**

ATTN BOG COMMENTS  
Alaska Dept. of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau AK 99811-5526

Fax 907-465-6094

Proposal # 49. Strongly Oppose. There are already plenty of summer time, gut shot, unreported bears already. If this passes you might as well open airborne hunting of brown bears. Area village residents have long practiced shoot on site and shut up regardless of season, size, limit or salvage requirements. The proposal seeks to make legal and now profitable what is now current practice for many. The current laws are not obeyed, enforced or prosecuted and I know the profit potential will not drastically change the current practices. Management and management goals are worthless without compliance and enforcement. The fact is, few wounded or killed bears will be reported and sealed.

The best and safest way to reduce the number of moose killing bears is to pass proposal # 52 which calls for an earlier season and explains why Roger Skogen and villagers are seeing fewer moose and calf tracks.

Proposal # 50 OPPOSE I am not sure whether this proposal request predator management of all predators or just brown bear. Wolf populations have increased. Brown bears have probably decreased since I first started guiding/hunting there yearly since 1991. Plus the bears have been educated. At this time there is no problem with brown bear management that can not be addressed through other means such as Proposal # 52.

Proposal # 51 OPPOSE. Game management for all game is not a concern of Mr. Stratton. The BOG passes the regulations he cites based on sound long term management for all species. Ignore this proposal and all other of his proposals.

Proposal # 52 Support Strongly. This proposal will align brown bear season with unit 19 and allow a reasonable increase in the number of bears taken and allow the taking of more mature moose killing bears. A more reasonable option than Proposal # 49.

Proposal # 55 Support. The Board should be aware the management goal before the 2001 objectives were raised is what they propose now! For future reference; when a herd is exploding like the Mulchatna herd did, proper management is a policy that demand 1-2 cows being shot before you can take a bull. And Spring hunting of pregnant cows by snow machine is never a good idea! Especially when, pregnancies rate drop drastically and calf recruitment is below 10% which was the case 8 years ago.

Proposal # 57 OPPOSE. The current regulations are accomplishing the objectives. Iliamna should have worried about the area caribou herd and low bull to cow ratio a long time ago. Air taxis operating from Iliamna were a large portion of the unit 17 problem. Now the transporters have gone to Nome and Kotzebue to rape that herd. The current season of Sept 1-15 for non-residents is good management.

Proposal # 61 Support Strongly. This is my proposal. Something must be done. I listed 3 reasonable options for the Board and public to discuss and adopt. Option 2 is preferred as the simplest solution. The low amount of use by area residents in the area effected by RM587 hardly justifies the permit. Option # 1 is clearly justified and reasonable based on past area resident use patterns. It removes drainages from RM 587 that are used seldom or not at all by area residents and establishes reasonable permit conditions. By allowing the guide to pick up the permit; the guided hunter does not risk being turned away at the last minute. The transported hunter can fly elsewhere. Option # 3 is the minimum action the Board should consider taking. It leaves the permit area intact and unchanged while only relaxing the permit requirements. In 3 of the last 4 years, less than 30% were issued. The goal of RM587 was to reduce non-resident hunters. It was too effective.

Proposal #62 Support Amended. The area biologist told me he would use discretionary permits to keep the Iowithla drainage closed. I believe him but I am concerned about future biologist not knowing the history of the winter hunts in the Iowithla. The Iowithla has been closed to prevent easy and quick over harvest. It should place an exception (no winter season) on the Iowithla winter season in the regs.

Proposal # 63 Support. The moose in unit 17 are going into polished antler rut 5-15 days later. A wise move would include adjusting the season but only a **little** to prevent over harvest.

Proposal # 68 Support. In 1991 when I began guiding in unit 17 B & C a wolf track was somewhat rare. Snow machines and gas were cheap and wolf hides relatively high. Wolves are well established and need thinning. Methods, means, and seasons need to be expanded and extended as much as possible.

Proposal # 69 Support. Amended. I do not think brown bears need controlling where as wolves do.

Proposal 106 & 107 Appose strongly. Hunting season should be open to all. Weapon choice is your idea. No special bow or muzzle loader or cripple hunts should be created.

Proposal #111 Strongly APPOSE. As a Guide; if my client friend draws a tag and he wants to hire me and I am currently licensed to pick that guide use area; there is no good reason not to be able to guide him. Conversely, why should a guide have to pick a guide use area when he may not have any clients for that guide use area due to the bad luck of the draw. Which guide takes the lucky client has absolutely nothing to do with game management! This proposal puts the cart before the horse.

Proposal #132 Support. F&G has drastically under estimated the number of brown bears on the Kenai for over 20 years. Years ago, F&G made a joke of an attempt to count the bears by baiting them and then dropping down on them in a helicopter gun ship and darting them. No one ever did explain where the bear with the 40 inch long, gut stitch up job happened. But the picture is still out there.

Proposal # 198 Strongly Support and Amended. The author's arguments are true. Change is needed. Any option is better than what we have now. It should be applied statewide. I am supporting option # 2 but amended as follows:

"The client and guides name must be listed on the Bait Permit.

The guide must accompany the client unless the guide client contract specifically states the hunt is outfitted and unguided.

The guide must provide 1 copy of the guide client contract and a copy of the clients hunting license number and a copy of the big game tag/s to F&G when registering the bait permit in their names.

The bait must be removed with in 48 hours after the client, whose name also appears on the bait permit, leaves the field unless the guide has also registered the same bait location for future clients or his employees. If the guide leaves the bait in the field for future hunters who are also registered for that site; the guide must change the bait sign to the new hunter name/permit with in 48 hours. "

The guide may not let any other clients utilize the bait before the client whose name is on the permit is done hunting.

The amendment proves there is a paying hunter, that the bait will be removed in a timely fashion and it eliminates the stupidity of removing a bait only to replace it the next day or two. It also prevents a guide from shooting out a clients bait before he arrives.

The current regulations prevent the Board from utilizing guides and their clients to help with black bear/predator management when needed. It is stupid for the State to pay over \$1000/bear to relocate them from unit 19 to unit 20 as they did a few years ago. Plus; there is no good reason for preventing guides from doing the job they were trained and licensed to do in their guide use area. The fewer baits that a guide has to work with; the less selective they can be. Be smart and do something!

Proposal # 201 Strongly APPOSE. Passing this proposal will undermine current regulations for all species and all areas. Current regulations and definitions already address this situation. "Bag Limits" describe how many animals you may take. "Take" is defined as "wounding". A wounded animal is a "taken" animal. What MAY need clarifying is that the tag required for that animal is spent and may not be placed on any other animal. That is, a hunter who wounds any game, and does not find the game, may not then use the tag on any other game. Ask FWP if they would win a case with all the facts presented under current regulations. They should. A clarification in the regulation book would solve any problems.

Clarify Wounding Regulations as follows:

"Wounded game that is not found is considered killed game and is counted against the bag limit and the big game tag, if needed, is forfeited." Apply State wide

Define WOUNDING an animal: wounding an animal is "taking" an animal.

- a) "Wounding of game is defined as using any weapon that knocks down or cripples an animal, or causing any body parts (including blood, skin or hide) to leave the animal except hair, fur, horn or antler pieces. "
- b) An animal is also considered wounded if the weapon impact to the animal is visually witnessed with reasonable certainty regardless if any blood or body parts are found.

Proposal # 220 Support. Amended. Amend to include: The client may not take any game spotted by the transporter or his employees. Aircraft based transporters have been flying around spotting game before dropping off the clients for years. That is already illegal under the BGCSB Regulations and Statutes. It has never been enforced. This would educate the client and hold the client equally responsible for the violation. There is a problem that the author is addressing. Plenty of illegal guiding by transporters and illegal transporting is going on by plane and boat.

Proposal # 221 APPOSE as written. But would support a statewide regulation that forbids everyone from intentionally spotting game from the air.

Proposal # 222 APPOSE This will create a near roadside haven for all wildlife and increase vehicular collisions.

Proposal # 223 Strongly APPOSE. As a Guide; if my client friend draws a tag and he wants to hire me and I am currently licensed to pick that guide use area; there is no good reason not to be able to guide him. Conversely, why should a guide have to pick a guide use area when he may not have any clients for that guide use area due to the bad luck of the draw. Which guide takes the lucky client has absolutely nothing to do with game management!

Proposal # 240 APPOSE. I have to appose this proposal because the author stated that "no one" would suffer. That is wrong. Since each permit application costs money; the rich people can better afford to increase their odds with six chances. The fact is, the poor hunter will suffer under this proposal and the rich hunter would benefit.

Proposal # 241 Strongly Appose. The drawing system we have now is fair to everyone, every year. It could not be more fair! The bonus point system is designed to grant some people better odds or even guaranteeing

them a permit over time. The 50% allocated to bonus point applicants takes away from the amount available to non-bonus point applicants. The bonus point applicant gets a chance plus a bonus point where as the other hunter only gets a chance! Outside hunt clubs have been donating money (over \$300,000) to APHA to get this proposal passed because it will benefit them not the average Alaskan. They want you to give them something at the expense of someone else. Don't do it!

Proposal # 243 Appose. While good hearted, this proposal takes opportunity away from everyone else and creates a special class. We do not need more "special areas" or "special classes of hunters" We do not need division and confusion in the regulations. If passed it should be restricted to federal military lands or National Parks.

Proposal # 244 APPOSE Strongly. A good shot with any bullet will kill quickly. A bad shot with a FMJ will be less likely to kill the animal where as a non FMJ bullet will damage much more tissue and lead to long term suffering and probable death from infection. There are instances where a FMJ is a desired bullet. There will be an enforcement problem even with a FMJ definition. There are now factory designed hunting loads that have performed excellent and they could be considered FMJ. This proposal should not be passed and not for all calibers statewide. If the gun grabbers eliminate bullet access as some people predict, then a military round FMJ may be all available in the future. NATO requires FMJ for humanity reasons. Live or die but don't suffer as much.

Proposal # 245 APPOSE A simple proficiency test would save everyone time and money. The current BOG should be made aware of the past. When the bow hunter proficiency test was first proposed and comments solicited; the proposal centered around a simple and quick proficiency test. Walk in to F&G, out the back door, release 3 arrows. Either you passed or failed. OR you qualified with a IBEP certification so non-residents could qualify. That part of the proposal was supported more or less. Will the State provide the IBEP classes? What happens when there isn't one available in Fort Yukon or Dublin VA. I have never seen an IBEP class offered. Have you? Passing a test 20 years ago does not make you qualified. I guided a certified IBEP instructor on a black bear bait. In the first hour he completely missed the whole 8 foot bear and wounded a 7 ½ foot bear in the neck. The same night his nephew that he had trained grazed a 6 ½ foot bear. IBEP means nothing.

IF adopted the regulation should be amended and state that OR " bow hunters may qualify by passing a proficiency test at F&G every 2 years."

Sincerely;

  
Smokey Don Duncan Master Guide #136  
299 Alvin St. Fairbanks AK 99712  
457-8318

**Feb. 13, 2009**

To: BOG Comments  
Alaska Department of Fish and Game  
Board Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Fax: 907 465 6094

Dear Board of Game members,

I would like to comment on several proposals that affect wildlife in Denali State Park. Denali State Park continues to receive an ever growing number of visitors hiking and running rivers. I believe Denali State Park should be managed differently then other areas in Unit 13.

Proposal 114 would expand predator control into Denali State Park along the west bank of the Susitna River. I suggest placing the boundary along the east bank of the Susitna River and keep Denali State Park out of the predator control area.

Proposal 73-74 - Make it perfectly clear that the baiting of black bears is already prohibited in Denali State Park.

Proposal 75 - Baiting of brown bears in Unit 13. Baiting of brown bears should not be allowed in the Indian River State Recreation Area (which is adjacent to Denali State Park) or along the west shore of the Susitna River in Denali State Park. This practice could endanger fisherpeople on Indain River, local cabin owners and Denali State Park users by habituating bears to come to food sources put out by people. Baiting of bears has no place on State Park lands.

Proposal 76 & 79 - Increases the bag limit on brown bears in unit 13. Denali State Park should be excluded from this bag limit increase. Many people use Denali State Park hoping to get an opportunity to observe brown bears.

Denali State Park should really be managed as its own unique sub unit.

Sincerely,

  
Brian Okonek  
P.O. Box 583  
Talkeetna, AK 99676

Fax: 907 733 2111

2-12-09

Hello:

RECEIVED

FEB 13 2009

BOARDS  
ANCHORAGE

Attn: Scott

B06

Public Comments

(p 1 of 2)

I am an Alaskan and a wildlife conservationist. I've traveled the world to view wildlife and would like to keep Alaska wild. I disagree with many of the proposals before you and ask that you vote no on these:

Proposals: 76, 130, 131, 135, 49, 50, 68, 69, 75, 189, 192, 168, 170, 125, 128, 170, 132, 153, 237, 239, 235, 236, + 190.

All of these proposals lead to senseless killing of wildlife. In my opinion managing wildlife would mean using science to report and learn the behavior of all Alaskan's wildlife. By learning their systems we could learn how humans can co-habitate in the world with them. Management does not mean gas, shoot from airplanes or helicopters, kill babies or mothers so I think it makes very good sense that you rid the Alaska's Board of Game members who view wildlife as income when dead. Replace these cavemen + cavewomen perspectives with socialized individuals who respect, value and want to protect the wildlife. Our children + great grandchildren deserve a future with wildlife, not fenced areas with moose to shoot and boxed wolves + bears. Use science, include views that want to preserve wildlife rather than altering it for some financial reason.

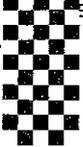
The proposals that I support are:

22, 27, 44, 45, 51, 77, 78, 174, 43, and  
224.

Animals alive are more valuable than  
animals dead. Please use the  
resources you have been given to protect  
all wildlife, predators included.

*Opinion*

(p2 of 2)



February 13, 2009

Chairman and Members of the Alaska Board of Game:

Please consider my comments on the following proposals when making you decisions during the upcoming 2009 Spring Board of Game meeting in Anchorage.

#180 I support. I would bring to the Board's attention that this proposal was written to include Units 14A, 14B, and 16A, but when #180 was published in the proposal book, Unit 14A seems to have inadvertently been left off the proposal. I am the person who originally wrote this proposal that was adopted and submitted by the Matanuska Valley AC. When I pointed this mistake out to the Matanuska Valley AC, the proposal was reconsidered and the AC added an amendment by unanimous 15 -0 - 0 vote to include Unit 14 A in the proposal as originally written -- this can be checked in the AC minutes. This proposal has broad public support in our area, was approved by the ADF&G Area Game Management Biologist as biologically sound, and was submitted and supported by the Matanuska Valley AC. Please Adopt as originally written including Units 14A, 14B and 16A.

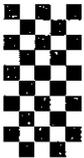
#177 I support. This proposal seeks to increase antlerless moose permit winners in Unit 14A, further spread Unit 14A moose hunting pressure through out the season, and was reviewed and approved by the ADF&G Area Game Management Biologist as biologically sound, before it was adopted, submitted, and supported by the Matanuska Valley AC. Please Adopt and provide resident Alaskan hunters a greater opportunity to win a moose drawing permit in a biologically sound manner.

Thank you for your consideration of my thoughts on these two proposals.

Sincerely,

Andrew N. Couch

PO Box 155, Palmer, AK 99645 (907) 746-2199



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

Written/Submitted by:

Scott Luber  
5918 E 22<sup>nd</sup> Ave.  
Anchorage, AK 99504  
(907) 677-0705

To Whom It May Concern:

Attached are comments for support or opposition of several of the proposals for the upcoming Board of Game meetings. Thank you for allowing public comment and your continued striving to effectively manage Alaska's game populations.

These comments are undersigned and supported by the following people.

Scott Luber  
Dana Bertolini  
Jerry Ralston  
Frank Monosso

Note: There are 9 pages including this cover letter.

**Proposal Number(s) 13, 111****SUPPORT AS AMENDED****Amendments**

- Require non-residents to have a signed guide-agreement before applying but for their draw permits, unless hunting with a relative who is an Alaska resident and is within second degree of kindred.
- Limit non-resident draw permits to 10% or eliminate non-resident tags for 14C altogether.
- 1 Non-resident tag (10%) would available if there are 10 tags available for a particular draw area. If there are less than 10 tags for a draw area – no non-resident tags would be available for drawing.
- This needs to be implemented in all of 14A, 14C, and 13D.

**Comments:**

- This is one area that guides, booking agents, and application services have allowed greed to be involved in the permitting process. As the drawing regulation stands currently it allows for an increased number of non-residents drawing the limited permits and therefore taking more and more sheep as it is known and proven that non-resident, guided, hunters are up to 45% more successful per tag than the resident hunts. Legal rams in 14C need to rebound from their low numbers to what they have been in the past. Limiting or eliminating those who are most successful per tag is a great way to see this happen.

**Proposal Number(s) 14, 16, 17, 19, 212, 214,****SUPPORT AS AMENDED****Amendments**

- 1 Non-resident tag (10%) would available if there are 10 tags available for a particular draw area. If there are less than 10 tags for a draw area – no non-resident tags would be available for drawing.
- Require non-residents to have a signed guide-agreement before applying for their draw permits, unless hunting with a relative who is an Alaska resident and is within second degree of kindred. (see comments for Proposal #13, 111)
- Proposal 19 – (early season for residents only) to be implemented at a later date following a year or two of the 10% limitations to non-residents tags if sheep or legal ram numbers need a dramatic boost to recover.

**Comments:**

- Resident sheep hunters should be considered above non-residents just like they are in every other state. Residents are known to be less successful

than non-residents. With limited numbers of legal rams available, the best solution for growing more sheep on the mountains is to limit those that per tag are the most successful. Residents should be taken into consideration much more over the non-resident hunters. Residents are the ones that live here year round, endure the winters, and invest much more in our state than non-residents.

- Proposal 19 – (early season for residents only) Limiting the season dates for which non-resident hunters can hunt is another great way to boost sheep and legal ram numbers. However, this should only be implemented on an as needed basis after data is reviewed from one or two years worth of seeing the limited non-residents allotments for hunting in a unit or region.

### **Proposal Number(s) 15**

SUPPORT

#### **Amendments**

- None

#### **Comments:**

- Non-resident hunting has clearly taken its toll on the rams in 14C. It was a privilege that has been abused, and quick recovery would mean taking away the factor that has be most damaging.
- Why not limit this great hunt area (14C) to those that live in the state. There are plenty of opportunities for sheep hunts for non-residents. 14C tags are already limited and coveted; it would be great to see this go resident only as a privilege, perk, and blessing, for those that live here year round.

### **Proposal Number(s) 18**

SUPPORT AS AMENDED

#### **Amendments**

- Change legal sheep to “Any Ram” for the bow hunt draw permits.

#### **Comments:**

- Sheep numbers in 14C are low. Allowing the harvest of any female in the unit limits the number of sheep that are put back on the mountain each year.
- Bow hunter success is extremely low for sheep hunting and allowing the taking of any ram in these limited hunts still allows for greater possibility of an archer being successful but does not take away the breeding females.

**Proposal Number(s) 104, 105**

SUPPORT

**Amendments**

- None

**Comments:**

- Unless in a specific draw area, all legal rams taken in the State of Alaska should be defined as "full curl, double-broomed, or 8 years old." This keeps things clear across the state and no false, and unethical reporting would be possible.

**Proposal Number(s) 106**

SUPPORT

**Amendments**

- None

**Comments:**

- Creating more opportunities for archery hunters is a great idea. Archers are the most unsuccessful hunters in the field and providing them with their own season dates and hunt is a great proposal.
- The limitation of non-residents to 10% is needed here for the reason that non-resident hunters are currently dominating the drawing process and are much more successful per tag than residents.

**Proposal Number(s) 107, 211**

SUPPORT AS AMENDED

**Amendments**

- Make the dates for this archery only hunt October 1 – October 10
- Limit non-resident tags to 10% of the total amount to be awarded.
- 1 Non-resident tag (10%) would available if there are 10 tags available for a particular draw area. If there are less than 10 tags for a draw area – no non-resident tags would be available for drawing.
- Require non-residents to have a signed guide-agreement before applying for their draw permits, unless hunting with a relative who is an Alaska resident and is within second degree of kindred. (see comments for Proposal #13, 111)

**Comments:**

- Part of the reason that 14A and 13D went to draw is because of overcrowding arguments. Allowing more tags to be drawn and more hunters in the field defeats this purpose.

**Proposal Number(s) 108**

OPPOSE

**Amendments**

- 

**Comments:**

- This is implementing a registration type hunt and will be difficult and expensive to be managed properly.
- A better solution is available in Proposal 109.

**Proposal Number(s) 109**

SUPPORT AS AMMENDED

**Amendments**

- Require non-residents to have a signed guide-agreement before applying for their draw permits, unless hunting with a relative who is an Alaska resident and is within second degree of kindred. (see comments for Proposal #13, 111)

**Comments:**

- This is a great way to keep sheep hunting areas open to general harvest by residents and limit the non-resident hunters who are using guides as they are proven to be much more successful due to the reasons stated in arguments for this proposal by the Matanuska Valley Fish and Game Advisory Committee.

**Proposal Number(s) 110**

OPPOSE

**Amendments**

- None

**Comments:**

- There are better ways to limit those that are the most successful – mainly the non-resident hunters. A better solution is available in Proposal # 109.

**Proposal Number(s) 184**

SUPPORT AS AMENDED

**Amendments**

- 1 Non-resident tag (10%) would available if there are 10 tags available for a particular draw area. If there are less than 10 tags for a draw area – no non-resident tags would be available for drawing.
- Require non-residents to have a signed guide-agreement before applying for their draw permits, unless hunting with a relative who is an Alaska resident and is within second degree of kindred. (see comments for Proposal #13, 111)

**Comments:**

- Full curl rams ( better defined as 8 years or older) suffer a higher winter mortality rate than rams of a younger age. This is due to the fact that they are doing the majority of the breeding during the rut and therefore are “worn down” physically as they face the winter months. Younger rams, not participating in the rut have a higher chance of making it through a harsh winter because they do not deplete themselves during the rut. The prolonged harvest of young rams will result in lower numbers of rams in an area that allows for the harvest of any ram during a hunting season.

**Proposal Number(s) 208**

SUPPORT

**Amendments**

- None

**Comments:**

- Sheep populations are low in both of these units. It was good to see the 14C ewe tags not available this year. Do not allow the harvesting of ewes anywhere when more sheep are desired in a particular unit.

**Proposal Number(s) 209**

OPPOSE

**Amendments**

- None

**Comments:**

- Opening these units back to open harvest tags ruins all efforts that are being implemented to try and allow for more and bigger rams in these two units. More importantly it does nothing to limit non-residents from taking the majority of rams per tag holder.

**Proposal Number(s) 210**

OPPOSE

**Amendments**

- None

**Comments:**

- A better solution is available in Proposal # 107 & 211

**Proposal Number(s) 213**

OPPOSE

**Amendments**

- None

**Comments:**

- This is a drastic move to allow for better hunting opportunities. Resident sheep hunters should not have to suffer (having their general hunting areas taken away) because guides and non-residents have abused the current system.

**Proposal Number(s) 215, 219**

SUPPORT

**Amendments**

- None

**Comments:**

- The sealing of sheep horns should be required from any ram harvested State-wide. This way there can be no confusion, cheating, or false, unethical reports.

**Proposal Number(s) 216**

SUPPORT AS AMENDED

**Amendments**

- As determined archery draw permits can allow "any ram" harvests.

**Comments:**

- Full curl rams ( better defined as 8 years or older) suffer a higher winter mortality rate than rams of a younger age. This is due to the fact that they are doing the majority of the breeding during the rut and therefore are "worn down" physically as they face the winter months. Younger rams, not participating in the rut have a higher chance of making it through a harsh winter because they do not deplete themselves during the rut. The prolonged harvest of young rams will result in lower numbers of rams in an area that allows for the harvest of any ram during a hunting season.

**Proposal Number(s) 217**

OPPOSE

**Amendments**

- None

**Comments:**

- The requirement of having to have horns checked and sealed is a good deterrent for a hunter contemplating taking a ram that is borderline legal. It's a good bet that hunters that would shoot a ram before knowing, without a doubt, that the ram is legal, would do so regardless of the sealing requirement being in effect.

**Proposal Number(s) 218**

OPPOSE

**Amendments**

- None

**Comments:**

- There are better ways to limit the amount of non-residents in the field without taking away (hunting seasons) from residents. Residents should not suffer because guides and non-residents have abused the current system.

February 13, 2009

Alaska Department of Fish and Game  
P. O. Box 115526  
Juneau, AK 99811-5526  
FAX 907-465-6094

RECEIVED

FEB 13 2009

BOARDS  
ANCHORAGE

*Ann: Scott  
BOG  
Public Comments*

Attention: Board of Game

Re: Spring Meeting: 2009

Dear Board Members:

*Andrew Joseph  
AWA President*

The Alaska Wildlife Alliance offers comments on the proposals listed below.

**Proposals 1, 2, and 3. Oppose.** These three proposals would expand brown bear hunting in Chugach State Park. The AWA opposes these proposals. Bear attacks in Anchorage present a public safety issue in an urban area. As such they should be treated as a safety issue, not an opportunity for hunters to increase their opportunities for enjoying their sport. Professionals, such as ADF&G biologists, should selectively kill problem bears, when and if circumstances indicate that there may be a threat. The rest of the bears, especially those deep in Chugach State Park, should be left for wildlife viewing.

**Proposal 4. Oppose.** This proposal would expand hunting for mountain goats in areas close to Anchorage, including Chugach State Park. Mountain goats are one of the most sought after animals for viewing. While the population may tolerate a small amount of hunting, the hunting of these beautiful animals should be tightly regulated with permit only hunts.

**Proposal 5. Oppose.** This puts the question of hunting in what amounts to the Anchorage Bowl out of the hands of the citizens of Anchorage. The writer has driven in Anchorage for 44 years without a moose-car collision. People like seeing moose in the city. Oppose.

**Proposal 6. Conditional non-opposition.** The AWA oppose moose hunts in Anchorage Management Area, but does not oppose this proposal as it affects other parts of Unit 14(c).

**Proposal 7. Oppose.** Generally, the AWA would defer to the military on this question, however the proposal indicates that current populations are below population objectives.

**Proposal 8. Oppose.** Anecdotally, the majority of Anchorage citizens do not want a hunt in the Bowl and do not believe that there are too many moose.

**Proposal 9. Support.** AWA is non-opposed to this proposal.

**Proposal 10. Oppose.** The statistics provided are old and speculate about harsh winters that may or may not come. Generally the AWA would defer to the military, however not on this proposal.

**Proposal 11. Oppose.** A recent Anchorage Daily News article expressed concern with the impact on hunting trails in the Upper Ship Creek area due to packing of horses by hunters. It is believed that trail impact will not be minimal.

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**Proposal 12. Opposed.** The data provided suggest that moose are struggling in the area and that the carrying capacity cannot support hunting at this time.

Proposals 13-17. Partially support. These five proposals are aimed at reducing the opportunity for non-residents to obtain highly prized permits to hunt Dall sheep in Unit 14C. This unit consists primarily of Chugach State Park. The AWA's focus is on the wildlife, not allocation issues, and ordinarily avoids getting involved in allocation issues. The AWA supports limiting non resident permits in Chugach State Park, however. Chugach State Park is well managed, and sheep hunting permits very highly sought after. The secret is that motorized access is either highly controlled, as at Eklutna Lake, or prohibited entirely, as in the upper reaches of Ship Creek. The AWA wishes to support hunters who are conservation minded, and imagines that resident sheep hunters who compete for sheep hunting permits in 14C must be conservation minded since they wish to hunt in an area where there are no roads, ATV trails, etc.

**Proposal 18. Oppose.** This proposal would change the permit requirements for bow hunting of Dall sheep so as to restrict bow hunters to full curl rams only. The targeting of only full curl rams so as to provide a higher level of hunter opportunity is a bad idea. This type of selective hunting will cause (and already has caused) permanent damage to the sheep gene pool. FOREVER. Full curl horn rules are Darwin in reverse, where breeding by the strong and large is discouraged, while breeding by the small and weak is encouraged. Shame on the Alaska Outdoor Council and the proponent of this proposal for putting their sport ahead of the interests of Alaska's wildlife heritage.

**Proposal 19. Support.**

**Proposals 20, 21, and 23. Support.** These proposals would provide for increased buffer zones in Unit 14(c), where trapping would be prohibited. Buffers would be established (or increased) in the vicinity of developed trails, roads, and communities. Chugach State Park is heavily used by recreational non-consumptive users, many of whom hike and ski with their dogs. Anchorage is an urban area, and it is time that its "neighborhood" park is treated as such. In other words, trapping, if done at all, should be far removed from areas heavily used by hikers and skiers. As long as trapping is allowed close to trails, roads, and communities, these areas are effectively closed to responsible pet owners during trapping season. There are only a few trappers using Chugach State Park, and they are vastly outnumbered by hikers and skiers. It is time for change in this neighborhood park.

**Proposal 22. Support.** This proposal would ban lynx trapping in Chugach State Park. Lynx are a highly valued animal for wildlife viewing, and

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trapping lynx reduces wildlife viewing opportunities for the thousands of people who hike and ski in the Park. These thousands vastly outnumber the trappers who seek to appropriate these beautiful animals for their personal, exclusive, use. We live in a democracy where the majority's interests should be respected. Furthermore, lynx traps pose a threat to hikers and skiers who use the park with their dogs. Chugach State Park is a neighborhood park, on the edge of a modern urban area. Wildlife within it should be managed with this perspective, and not with nostalgia for the days when Anchorage was America's frontier.

**Proposals 24, 25, 26, 27, and 28. Support.** These proposals would ban trapping of wolverine in Chugach State Park. The Board made a severe error in authorizing wolverine trapping when it met in 2007. It is time to correct the error for all the reasons mentioned by the proponents of these five proposals. Proposal 25 would not only ban trapping of wolverine in Chugach State Park but also the trapping of coyotes. The AWA supports the prohibition of coyote trapping within Chugach State Park for the reasons expressed above: namely that Chugach State Park is a "neighborhood" park, visited by thousands of hikers and skiers, many with dogs. As such, traps and trapping are inappropriate uses.

**Proposal 29. Support.** AWA supports this proposal.

**Proposal 30. Support.** AWA supports this proposal

**Proposal 31. Support.** AWA supports this proposal.

**Proposal 32. Oppose.** The AWA asserts that, according to the proposal, hunters are underutilizing what is currently available. Under the AWA view, it makes no sense to increase the take where there is a lack of interest in what is available. Further, the AWA does not generally prioritize the interests of out-of-state, Big Game hunters, although it is aware that there is economic value there.

**Proposal 33. Oppose.** For the reasons outlined in Proposal 32.

**Proposal 34. Oppose.** If for no other reason, the Proposal is not well-explained or justified.

**Proposal 35. Oppose.** The AWA does not support predator control except in extreme emergency situations. The proposal concedes that "it is not known if additional bear harvest would increase dusky goose productivity."

**Proposal 36. Support.** The AWA is, first and foremost, concerned with maintaining healthy populations, the apparent objective of the proposal as written.

**Proposal 37. Oppose.** This proposal would authorize a lynx trapping season in Unit 6, i.e. Prince William Sound, where it is presently closed. The proponent argues that since lynx hunting is permitted, so also should trapping. The AWA opposes this proposal because trapping (under state law) would dramatically increase the taking of lynx. If there is to be state authorized trapping, then it must be coordinated with federal subsistence trapping, with federal subsistence having the priority.

**Proposal 38. No Comment.** The AWA expresses no comment.

**Proposals 39, 40 and 41. Support.** These proposals would re-authorize antlerless moose hunts in Unit 6. The AWA is concerned about targeting only

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large bull moose, and thus supports antlerless hunts, as long as there is no over harvest. The AWA does express some concerns, however, with the fact that (Proposals 39 and 41) the census objective is not currently reached.

**Proposal 42. Support.** The AWA ardently supports this proposal.

**Proposal 43. Support.** The AWA ardently supports this proposal.

**Proposal 44. Support.** The AWA supports this proposal.

**Proposal 45. Support.** The AWA supports this proposal.

**Proposal 46. Oppose.** The AWA opposes this proposal, although as a policy question, an expression of local concern is respected and appreciated.

**Proposal 47. Oppose.** The proposal concedes that "there is no hard population date [] available."

**Proposal 48.** The AWA offers no comment.

**Proposal 49. Oppose.** The AWA strongly opposes the proposal, particularly that part of the proposal that indicates that there would be "no limit to the number of brown bears taken by an individual permittee." The AWA opposes predator control except in extreme cases and emergencies.

**Proposal 50.** The AWA supports the program as to Unit 17B and opposes the program as to Unit 17C. Unit 17C purportedly has healthy moose populations.

**Proposal 51. Support.** The AWA supports this proposal.

**Proposal 52. Oppose.** The proposal speaks to the potentiality of drops in the moose populations in the area indicated. The proposal seeks to take bears at their most vulnerable when they are feeding on moose carcasses. The proposal seeks the deliberate taking of the largest of the brown bear species. The AWA opposes this proposal.

**Proposal 53. Support.** This proposal would close the hunting season for Unit 9D caribou. Radical wolf control was found by the Department to be necessary to prevent the elimination of the Southern Peninsula Caribou herd. This radical control program involved the killing of all wolves in the area. If such a radical program was found necessary, then so also should caribou hunting be ended, until the herd recovers.

**Proposal 54. Support.** This proposal would close the hunting season for caribou on Unimak Island due to sharp declines in population and calf recruitment. The AWA supports efforts by the ADF&G to preserve Alaska's wildlife, and this appears to be a meritorious effort.

**Proposal 55. Support.** This proposal would replace the unrealistic population goals (set in 2001) for the Mulchatna caribou herd with lower goals. The AWA notes that the population goals for many herds are unrealistic, and fail to take into consideration fluctuations that are part of nature. This is a problem because if a population objective is not met, then intensive game management must be considered. The AWA is glad that the goal for the Mulchatna caribou is being adjusted downward.

**Proposal 56.** The AWA offers no comment to this proposal.

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**Proposal 57. Support.** The AWA supports this proposal.

**Proposal 58. Support.** The AWA strongly supports this sensible proposal.

**Proposal 59. Support.** The AWA supports this proposal.

**Proposal 60. Oppose.** The AWA opposes this proposal.

**Proposal 61.** AWA makes no comment on this proposal.

**Proposal 62.** AWA makes no comment on this proposal.

**Proposal 63. Oppose.** The AWA opposes this proposal.

**Proposal 64. Support.** The AWA supports this proposal.

**Proposal 65. Oppose.** The AWA publicly supported this measure earlier in 2008, however, it believes that the culling of predators should have been completed at this time and a greater balance achieved.

**Proposal 66. Oppose.** The AWA believes that the proposal of 10 wolves per day is excessive.

**Proposal 67. Support.** The AWA supports this proposal.

**Proposal 68.** The AWA supports the proposal as to Unit 17B and strongly opposes it as to Unit 17C.

**Proposal 69. Oppose.** The proposal, as written, lacks scientific justification and sufficient explanation.

**Proposal 70. Partially support.** This proposal would shorten the rock ptarmigan hunting season in Unit 13 D due to low dramatic population declines. The AWA notes with distress that the ADF&G has observed NO rock ptarmigan in 13D during the last two surveys. Rather than shortening the season, the season in 13D should be closed. Entirely. As regards the remainder of Unit 13, the ADF&G notes much higher populations of ptarmigan in non-hunted areas such as Chugach State Park and notes that increased hunting may not be sustainable. For these reasons the AWA urges the Board to reduce, rather than expand hunting of ptarmigan throughout Unit 13.

**Proposal 71. Support.** The AWA supports the proposal.

**Proposal 72. Oppose.** The AWA opposes this proposal.

**Proposal 73. Oppose.** The justification made is that hunting is "difficult". The AWA opposes the proposal.

**Proposal 74. Oppose.** The AWA strongly opposes this measure. It is entirely inconsistent with what others report in their own proposals about the health of black bear populations in the area indicated.

**Proposal 75. Oppose.** AWA Strongly opposes this proposal.

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**Proposal 76. Oppose.** The AWA opposes this measure. There is a lack of scientific justification and explanation provided by the proposal.

**Proposal 77. Support.** The AWA supports this measure.

**Proposal 78. Support.** The AWA supports this measure.

**Proposal 79. Oppose.** The AWA opposes this measure. There is a lack of scientific justification and explanation provided by the proposal. It is unclear what allowing hunting, beyond the Unit 13 bag limit, has to do with preserving prey in Unit 13?

**Proposal 80. Oppose.** The Anchorage Advisory Commission speaks to this area as isolated an an "untapped resource." Given that State policy allows hunting virtually everywhere in Alaska, and hunting of nearly everything except marine mammals, it is not unreasonable to have a limited area hunting restricted.

**Proposal 81. Support.**

**Proposal 82. Oppose.** The AWA opposes measures that do not require the taking of the entire animal under principles of wanton waste and failure to salvage.

**Proposal 83. Oppose.** The AWA opposes measures that do not require the taking of the entire animal under principles of wanton waste and failure to salvage.

**Proposal 84.** AWA offers no comment. Philosophical support for subsistence.

**Proposal 85. Oppose.** The AWA has great respect and values the comments of first nations peoples. The concern with destruction of a potential artwork is considered, however the AWA opposes at this time.

**Proposal 86. No comment.** AWA offers no comment to this proposal but is sympathetic to rural subsistence and first nation's interests.

**Proposal 87.** No comment.

**Proposal 88.** No comment. Philosophical support for subsistence.

**Proposal 89.** No comment. Philosophical support for subsistence.

**Proposal 90.** No comment. Philosophical support for subsistence.

**Proposal 91. Oppose.** The AWA opposes measure that do not require the taking of the entire animal under principles of wanton waste and failure to salvage

**Proposal 92. Oppose.** The AWA opposes measures that do not require the taking of the entire animal under principles of wanton waste and failure to salvage.

**Proposal 93. Oppose.** The AWA opposes measures that do not require the taking of the entire animal under principles of wanton waste and failure to salvage.

**Proposal 94.** AWA offers no comment to this proposal but is sympathetic to rural subsistence and first nation's interests.

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**Proposal 95. Oppose.** The AWA is concerned that, where objectives have been met due to successful predator control efforts, the animals will then be culled excessively, the required census will not be met, and predators will once again be blamed. The predators will lose each time. The AWA does not view "underutilization" as a reason for necessarily increasing the hunt in a given area.

**Proposal 96.** Philosophical support for subsistence. This proposal asks for comments on whether a harvest of 600 moose in Unit 13 is sufficient for subsistence. If the harvestable surplus exceeds 600 moose, then the Board is required to issue sport permits. The AWA generally opposes radical manipulation of wildlife populations for the sole purpose of increasing moose and caribou populations. Furthermore, the AWA notes that the subsistence hunter is a meat hunter, and thus his/her focus is not on the largest trophy. Trophy hunting is harmful to wildlife since the largest male breeders are unnecessarily targeted (negatively impacting the gene pool), and since trophy hunters tear up the countryside driving ATV's all over the place looking for that rare moose that has a large enough rack to be taken.

**Proposal 97. Oppose.** The AWA strives for a wildlife balance. Predators are blamed for the taking of prey (caribou, moose, etc.) which they need to survive. Opening up the area for non-residents will make the prey, more and more, the culprit. We are told there are not enough moose for Alaskans--why, then, should we open up the hunt to 300,000,000 other Americans?

**Proposal 98.** The AWA offers no comment.

**Proposal 99. Oppose.** The AWA strives for a wildlife balance. Predators are blamed for the taking of prey (caribou, moose, etc.) which they need to survive. Opening up the area for non-residents will make the prey, more and more, the culprit. We are told there are not enough moose for Alaskans--why, then, should we open up the hunt to 300,000,000 other Americans?

**Proposal 100.** The AWA offers no comment to this proposal.

**Proposal 101. Oppose.** This proposal would authorize a non-resident moose hunt in Unit 13D. With moose hunting opportunities restricted in Southcentral Alaska, there is no reason why non-resident moose hunters should be invited to hunt in Unit 13D. The focus should be on the wildlife, not on how professional guides can make a living.

**Proposal 102. Oppose.** The AWA strives for a wildlife balance. Predators are blamed for the taking of prey (caribou, moose, etc.) which they need to survive. Opening up the area for non-residents will make the prey, more and more, the culprit. We are told there are not enough moose for Alaskans--why, then, should we open up the hunt to 300,000,000 other Americans?

**Proposal 103. Oppose.** The AWA strives for a wildlife balance. Predators are blamed for the taking of prey (caribou, moose, etc.) which they need to survive. Opening up the area for non-residents will make the prey, more and more, the culprit. We are told there are not enough moose for Alaskans--why, then, should we open up the hunt to 300,000,000 other Americans?

**Proposals 104 and 105. Oppose.** These proposals regarding Unit 11 would replace 3/4 curl requirements for Dall Sheep with full curl requirements. The issue is this: "Hunter opportunity" should not be the foremost goal of

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the ADF&G. Instead what should be foremost is the conservation of Alaska's wildlife. By restricting the sheep that may be taken to those with full curl horns, the Department can put more hunters in the field, than if it authorizes the taking of any male, or a male with 3/4 curl horns. But by selectively harvesting only the largest and oldest sheep, the gene pool is unnaturally impacted. Negatively. Darwin in reverse. If the Department is serious about its mission, then it will recognize the damage that is done to the gene pool of Alaska's sheep by the full curl rule, and remove it. Needless to say, the number of permits will need to be lessened if "any male" may be taken. But it is time that this issue is faced, and Alaska's wildlife preserved.

**Proposals 106 and 107. Partially oppose.** These proposals would authorize archery hunts for Dall Sheep in Units 14A and 13D, but apparently would target only full curl rams. The AWA opposes the targeting of only the oldest and largest breeding males. Furthermore, the AWA does not support non-resident hunts when Alaskans cannot obtain permits. The wildlife should have the highest priority, followed by Alaskan hunters. Lastly should be interests of non-residents, and professional guides who wish to supplement their income.

**Proposal 108. No comment.**

**Proposal 109. Support.**

**Proposal 110. Support.** This proposal would prohibit the use of aircraft in Unit 13 for locating wildlife, and make all of Unit 14C a restricted use area where motorized vehicles cannot be used in hunting. The AWA supports fair chase ethics, and thus supports the restriction proposed for Unit 13. As regards 14C, the AWA notes that Chugach State Park sheep permits are very highly prized because access within the Park is already sharply restricted. In other words, many hunters prefer the more traditional type of hunt offered in CSP. Restrictions on motorized access throughout all of 14C might be unrealistic, but should be enacted for areas such as the Hunter Creek drainages.

**Proposal 111. Opposed.** The AWA opposes this proposal.

**Proposal 112. Support.** The AWA supports this proposal.

**Proposal 113. Support.** The AWA supports this proposal.

**Proposal 114. Opposed.** The AWA opposes this proposal.

**Proposal 115. No comment.** AWA offers no comment.

**Proposal 116. Support.** The AWA strongly supports this proposal.

**Proposal 117. Support.** The AWA supports this proposal.

**Proposal 118. Support.** The AWA supports this proposal.

**Proposal 119. Opposed.** The AWA opposes this proposal. No information is provided that indicates the population can support the increase in hunting opportunity.

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**Proposal 120. Support.** This proposal would close beaver trapping in a portion of Unit 15 near Homer. The proposal is made by Mildred Martin, an elected representative on the Kenai Peninsula Borough Assembly. It is a well-thought-out proposal, with its focus on education, protections of fish habitat, and reducing the indiscriminate shooting of beaver for no purpose. As such it shows an appropriate respect for Alaska's wildlife, and the interests of a broad spectrum of Alaskans.

**Proposal 121. Support.** This proposal would close trapping of Red Fox on the Kenai Peninsula. (Units 7 & 15); furthermore it asks that the Board of Game consider restrictions on trapping of Red Fox in Unit 14C. The proposal is by the Kenai National Wildlife Refuge. The Kenai Red Fox may be a unique subspecies, and its numbers are reported to be very low. Continued survival of the Kenai Red Fox (if it is a subspecies) is apparently threatened by trapping. If the Kenai Red Fox is a distinct subspecies, then federal law, the Alaska constitution, and Alaska's statutes mandate that trapping of these animals be discontinued. The AWA urges caution and conservation. Thus, the AWA urges the Board of Game to prohibit trapping of Red Fox throughout Unit 14C since Chugach State Park and other parts of 14C may serve as a source for natural immigration to the Kenai Peninsula. More information is needed before trapping of Red Fox in this part of Alaska should be authorized.

**Proposal 122. Support.** This proposal would reduce the bag limit for marten trappers on the Kenai Peninsula. The Kenai Peninsula has become more urbanized over the years, and there are reported to be localized depletions in marten populations. Marten are beautiful, if rarely seen animals: watchable wildlife. There is no reason why marten trappers should be allowed to take more than two marten annually given these circumstances. There are many Alaskans who prize these animals and would appreciate a greater abundance.

**Proposal 123. Support but with additional restrictions.** This proposal would shorten the season and set the bag limit for wolverine at two per season. The Board's authorization of wolverine trapping in Chugach State Park and the disclosure of population figures for Unit 14C make clear that the ADF&G has overlooked this rare animal in recent years. Indeed, population densities of wolverine throughout Southcentral Alaska may be very low compared to natural population densities. For this reason, the AWA urges a closure of all wolverine trapping on the Kenai Peninsula, as well as in Chugach State Park (and other parts of Unit 14C) until more information can be gathered, and the survival of natural populations continued indefinitely.

**Proposal 124. Opposes.** The AWA opposes this proposal. Read literally, it seems to say that the hunter can choose not to take meat from the killsite.

**Proposals 125, 126, 127, and 128. Oppose.** These proposals would authorize the sale of hides, increase bag limits, lengthen seasons, and increase the baiting season for black bear. They would be applicable to the Kenai Peninsula, and reflect the view that black bears are vermin. We at the Alaska Wildlife Alliance have a greater appreciation for wildlife, including black bears.

**Proposal 129. Oppose.** The AWA does not oppose the taking of a true DLP bear. However, the Kenai population cannot be sustained and will be eliminated if this sort of proposal is passed.

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The Kenai's local governments need to do more to deal with their garbage, landfills, fish carcasses, and the like. This will be more effective.

**Proposals 130-141. Oppose.** The proposals would increase hunting of brown bears on the Kenai Peninsula. Wildlife viewing is an increasingly treasured activity for the majority of Alaskans who enjoy fishing, rafting, boating, hiking, and camping on the Kenai Peninsula. The interests of a handful of hunters should not outweigh the interests of the majority.

**Proposal 142. Support** but with additional restrictions. This proposal, by the ADF&G, would penalize a hunter who takes a nanny goat by prohibiting the hunter from taking a goat on the Kenai for the next five years. This is a good idea, but in light of reported declining goat populations, there should be additional restrictions on goat hunting in general. Hunter opportunity should not take precedence over maintaining healthy wildlife populations.

**Proposal 143. Oppose.** The AWA opposes this proposal.

**Proposal 144. Oppose.** This proposal would authorize goat hunting on Mt. Marathon, above Seward. Hundreds (if not thousands) of Alaskans and visitors climb the false peak of Mt. Marathon every year. Not far above the false peak (where the runner turn) the ridge narrows, and the terrain becomes more difficult. Goats can be found here, and seeing one is a great thrill for those hikers who make the effort. Killing these beautiful animals at this location would be an extraordinary waste of a beautiful resource.

**Proposal 145. Support.** This proposal would aid enforcement of moose hunting regulations by requiring the sealing of moose antlers. The AWA supports efforts to catch and prosecute hunters who don't follow the rules.

**Proposal 146. Oppose.** This proposal is not well-explained, among other concerns

**Proposal 147. Support.** This proposal by the Seward Advisory Committee would establish a moratorium on moose hunting in Units 7 and 15A until the moose population increases. The AWA supports responsible proposals to conserve Alaska's wildlife, and this appears to be such a proposal.

**Proposal 148.** The AWA offers no comment on this proposal.

**Proposal 149. Support.** The AWA supports this proposal.

**Proposal 150-153. Partial Opposition.** These three proposals by the ADF&G concern moose hunting in Units 15B, 15C, and 15A. As regards 15A, the proposal by the Seward Advisory Committee appears more responsible. As regards 15B and 15C, the AWA is concerned about targeting the biggest and oldest males. As discussed above, the result is "Darwin in reverse". It is time the Department to take a hard look at this issue, and give conservation a greater value than that given to the acquisition of trophies.

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**PROPOSAL 153 - 5 AAC 92.125. Predation control areas**

**implementation plans.** Establish a wolf control plan for Units 7 and 15 as follows:

**Wolves:** Allow the Alaska Department of Fish and Game to reduce wolf populations using any and all practical means possible.

STRONGLY OPPOSE for obvious reasons. Includes aerial hunting

.....  
**PROPOSAL 154 - 5 AAC 92.125. Predation Control Areas**

**Implementation Plans.** Implement a predation control area for Unit 15 as follows:

Units 15A and 15C shall be managed under intensive management practices for predator control.

**Proposal 155: Oppose.** The AWA opposes this proposal.

**Proposal 156. Oppose.** This proposal would authorize hunting within the Seward City limits. Most Seward residents we know would oppose this if they knew about it.

STRONGLY OPPOSE for obvious reasons. Includes aerial hunting.

.....  
**Proposal 157. Oppose.** The AWA opposes this proposal because it is not clear what the current season is for furbear trapping on the Kenai Peninsula.

**PROPOSAL 158 - 5 AAC 92.052. Discretionary permit hunt conditions and procedures; and 92.165.**

**Sealing of bear skins and skulls.** Modify the brown bear permit conditions for Unit 8 as follows:

Alaskan resident hunters: Drawing permits and sealing can be obtained at your local Department of Fish and Game offices in Homer, Kenai, Seward or Anchorage for brown bear hunters in Unit 8.

NEUTRAL. May cause more bureaucracy by decentralizing process.

.....  
**PROPOSAL 159 - 5 AAC 85.025. Hunting seasons and bag limits for**

**caribou.** Modify the bag limit for caribou in Unit 8 as follows:

Bag limit of one caribou per hunter, per year in Unit 8.

Open season dates: September 1 to October 31.

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Retain same-day-airborne regulation.

SUPPORT as these are feral caribou and presently there is no closed season or bag limit.

.....  
**PROPOSAL 160 - 5 AAC 85.025. Hunting seasons and bag limits for caribou, and 92.085(8)(5).**

**Unlawful methods of taking big game; exceptions.** Modify the bag limit for caribou in Unit 8 and apply a same day airborne restriction as follows:

Bag limit of one caribou per hunter per year in Unit 8. No closed season. No same day airborne allowed.

SUPPORT as essentially same as #158 but for no closed season and no same-day airborne hunting.

.....  
**PROPOSAL 161 - 5 AAC 92.010. Harvest tickets and reports; and 85.030. Hunting seasons and bag**

**limits for deer.** Require harvest reporting for deer on the Kodiak archipelago as follows:

SUPPORT as it adds survey questions about cryptorchidism in the deer in this area for F&G use.

.....  
**PROPOSAL 162 - 5 AAC 85.035. Hunting seasons and bag limits for elk.** Create an archery only hunt in Unit 8 as follows:

SUPPORT in that it creates non-firearm season without changing harvest goal.

.....  
**Proposal 163. Opposed** without more evidence about census populations, historical trends in the area, etc.

**Proposal 164. Opposed.** The AWA opposes this proposal.

**Proposal 165. Opposed.** The AWA opposes this proposal.

**PROPOSAL 166 - 5 AAC 92.125(d)(4) Predation Control Areas Implementation Plans.** Modify the bear baiting season and methods within the Unit 16 predator control area as follows:

1) Bear Baiting season open all summer, no closures. (Black bear baiting season open May 1st through

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October 31st.)

- 2) Bait stations must be at least 600ft from cabins.
- 3) Black Bears taken under predator control may be taken with snares.
- 4) Two Brown Bears maybe taken at Black Bear stations under predator control.

OPPOSE as it creates far too liberal a season and allows snaring.

.....  
**PROPOSAL 167 - 5 AAC 85.015. Hunting seasons and bag limits for black bear.** Modify the bag limit for black bear in Unit 14A as follows:  
 Increase the bag limit to 3 black bear per year in Unit 14A.

OPPOSE as there is no documented need to reduce black bear numbers in that area so drastically.

.....  
**PROPOSAL 168 - 5 AAC 92.125(d). Predation Control Areas Implementation Plans.** Amend the Unit 16 predation control plan to include the use of helicopters, participation by youth and nonresidents, group maintenance of bait sites, and no closed season for black bear baiting.

OPPOSE as this is essentially an all-out assault on black bear in Unit 16 without regard to real management.

\*\*\*\*\*  
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**PROPOSAL 169 - 5AAC 92.125. Predation Control Areas Implementation Plans.** Amend to allow more comprehensive youth participation in Unit 16 black bear management.

OPPOSE as this is partially covered in #168 and is already covered under state regs concerning hunting.

.....  
**Proposal 170.** Oppose. This proposal would authorize the snaring and trapping of brown bears and black bears if authorized by a predator control permit. In recent years what is referred to as "predator control" has been used as an excuse to authorize unsportsmanlike, wasteful, and cruel practices outlawed many years ago throughout the civilized world, including Alaska. This proposal to snare and trap bears would authorize yet another unsportsmanlike, cruel and wasteful practice for which all Alaskans should hang their heads in shame; that is, if it should pass.

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**PROPOSAL 171 - 5 AAC 92.125(d). Predation control areas implementation plans.** Allow black bear trapping in the Unit 16 predation control area as follows: Trapping of black bears is allowed.

OPPOSE as this uses snaring as harvest method for black bears.

.....  
**PROPOSAL 172 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear, and 92.132. Bag limit for brown bears.** Modify the bag limit for brown bear in Unit 14B as follows:

Resident and nonresidents: Unit 14B grizzly bear, one bear every year, September 1 through May 31.

NEUTRAL as it increases potential take but likely not by much.

.....  
**PROPOSAL 173 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Modify the brown bear season dates for Unit 16A as follows:

Resident and nonresident: Unit 16A grizzly bear, -one bear every year, August 10-May 31.

SUPPORT as it standardizes bag limits to match adjacent areas without negatively affecting bear population.

.....  
**PROPOSAL 174 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** In Unit 16B alter this regulation for brown bear to provide the following:

Set the brown bear harvest regulations back to the pre-Intensive Management rule that provided for 1 bear every four years in a season starting September 1 to May 25 for that portion of Unit 16B that is in Denali National Preserve.

SUPPORT as it reduces bear take under Intensive Management.

.....  
**PROPOSAL 175 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Extend the caribou season in Unit 16B as follows:

Extend the caribou season in Unit 16B to end on October 5.

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OPPOSE as it increases likelihood meat taken will be inedible due to rutting season.

.....  
**Proposal 176. Oppose.** The AWA opposes this measure/proposal.

**Proposal 177. Oppose.** This proposal would deplete the population quickly, and predators would then become the pariah.

**PROPOSAL 178 - 5 AAC 085.045(12). Hunting seasons and bag limits for moose.** Re-authorizes the drawing permit hunts for antlerless moose in Unit 14(A).

SUPPORT as it's pro forma for a moose hunt F&G approves.

.....  
**PROPOSAL 179 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the archery season dates for Unit 14A and 14B as follows:

In Unit 14A and B: **Residents Nonresidents**

1 moose per regulatory year,  
only as follows:

1 bull with spike-fork [AUG. 10 - AUG. 17] [AUG. 10 - AUG. 17]  
antlers or 50-inch Nov. 1 - Nov. 7 Nov. 1 - Nov. 7

SUPPORT as it doesn't really change bag limits or such.

.....  
**PROPOSAL 180 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Delay the moose season dates in Units 14B and 16A as follows.

Archery season: **August 20 - 28** [AUGUST 10-17]

General season: **September 1 - 25** [AUGUST 20 - SEPTEMBER 20]

SUPPORT as it doesn't change bag limits or methods.

.....  
**PROPOSALS 181, 182, 183**

SUPPORT as these are mainly changing season opening dates and establishing a moose season on Kalgin Island.  
.....

**Proposal 184. Oppose.** This proposal would establish full curl horn restrictions for Dall Sheep in Units 14A and 14B. As discussed above, the AWA believes that targeting the oldest and largest males results in "Darwin in reverse". It is time for change. The species, our wildlife heritage, should take precedence.

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**Proposal 185. Oppose.** This proposal would increase the wolf and coyote trapping season in Unit 16. There is no basis for an area wide lengthening of the season, and the only expressed reason for this proposal is to make it possible for a trapper using the Susitna as his "trap line" to use both sides of the river. Wildlife management should not be so focused on the ease of a handful of trappers using powerboats.

**PROPOSAL 186 - 5 AAC 85.056. Hunting seasons and bag limits for wolf.** Modify the season and bag limit for wolf in Unit 16B as follows:  
Set the wolf harvest regulations back to the pre-Intensive Management rule that provided for 5 wolves in a season starting August 10 to April 30 for that portion of Unit 16B that is in Denali National Preserve.

SUPPORT as it reduces bag limit for trapping wolves in 16b.

.....  
**PROPOSAL 187 - 5 AAC 92.125(d). Predation Control Areas**

**Implementation Plans.** Modify the predator control area in Unit 16 as follows:

Expand the predator control area to include all of Unit 16. Eliminate the arbitrary boundary dividing Unit 16A in half allowing the use of bear baiting in the fall.

OPPOSE as it opens all of Unit 16 to Intensive Management.

.....  
**PROPOSAL 188 - 5 AAC 92.125(d). Predation control areas**

**implementation plans.** Modify the Unit 16 predation control plan as follows:

Under section (3)(A) of 92.125(d) "the objectives of the predation control program are to halt the decline of the moose population within the predation control area of Unit 16 and to increase the fall (post-hunt) moose population to the intensive management objective of 10,000- 11,500 [6,500- 7,500] moose, providing a sustainable annual harvest of 500- 960 [310-600] moose,"

SUPPORT as it clarifies the goal for moose populations in Unit 16.

.....  
**PROPOSAL 189 - 5 AAC 92.125(d). Predation Control Areas**

**Implementation Plans.** Amend to extend the season for Unit 16 black bear management as follows:

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**5 AAC 92.125(d) Unit 16 Predation Control Area**

- (4) the permissible methods and means used to take predators are as follows:  
(D) the commissioner may reduce the black bear population within the Unit 16 Predation Control Area by means and direction included in the Board of Game Bear Conservation and Management Policy (2006-164-BOG), dated May 14, 2006, and incorporated by reference, including the following **conditions**, methods and means under a department developed control permit:  
(iii) same-day-airborne taking of black bears if the permittee is at least 300 feet from the aircraft, including the use of any type of aircraft, **including helicopters** to access black bear baiting stations **and associated camps from April 15 through Oct 15;**  
(iv) sale of un-mounted, tanned black bear hides if the sale tag remains attached;

OPPOSE as it allows same-day as airborne black bear hunting and sale of the hides.

.....  
**PROPOSAL 190 - 5 AAC 92.039. Permit for taking wolves using aircraft; 92.044. Permit for hunting black bear with the use of bait or scent lures; 92.068. Permit conditions for hunting black bear with dog; 92.080. Unlawful methods of taking game; exceptions; 92.085. Unlawful methods of taking big game, exceptions; 92.106. Intensive management of identified big game prey populations; 92.108. Identified big game prey populations and objectives; 92.110. Control of predation by wolves; 92.115. Control of predation by bears; and 92.125. Predation Control Areas**

**Implementation Plans.** Review intensive management options to be used by the Department of Fish and Game or contracted government agents of the department.

The department is considering, but not necessarily recommending the following changes at this time:

- 1) Use of carbon monoxide cartridges as an option for euthanasia of wolves by government employees.
- 2) Use of helicopters by government employees to take wolves from the air or to transport employees to and from the field to conduct wolf and bear management activities.

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3) Use of snares as a method to take black bear by government employees.

STRONGLY OPPOSE as it allows gassing of wolves, helicopter use to take wolves, black bear snaring.

.....  
**Proposal 191.** AWA offers no comment.

**PROPOSAL 192 - 5 AAC 92.039. Permit for taking wolves using aircraft; 92.080. Unlawful methods of taking game, exceptions; 92.115. Control of predation by bears; 92.110. Control of predation by wolves; and 92.125. Predation Control Areas Implementation Plans.** Amend the necessary regulations to allow the use of helicopters to access black bear baiting stations and associated camps as follows:

**92.039. Permit for taking wolves using aircraft.** Add the words "and bears" to the title and subsequent references to wolves throughout this regulation.

**92.080. Unlawful methods of taking game, exceptions**  
(3) knowingly, or with reason to know, with the use of a helicopter in any manner, including transportation to, or from the field of any unprocessed game or parts of game; any hunter or hunting gear, or any equipment used in the pursuit or retrieval of game; this paragraph does not apply to transportation of a hunter, hunting gear, or game during an emergency rescue operation in a life-threatening situation. **Nor does it apply to the use of helicopters under a permit within a predator control area identified in 5 AAC 92.125.**

**92.110. Control of predation by wolves.** The words "(including helicopters)" should be added after every reference to aircraft within this regulation.

**92.115. Control of predation by bears.** The words "(including helicopters)" should be added after every reference to aircraft within this regulation.

STRONGLY OPPOSE as it allows taking of wolves and bears by helicopter.

.....  
**PROPOSAL 193 - 5 AAC 92.540. Controlled use areas.** Ban the use of motorized vehicles for hunting in Unit 14A as follows:

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Close the area known as the south side of government peak to the use of motorized vehicles for hunting.  
Mirror the Department of Natural Resources regulations for the same area.  
Publish in the hunting regulation book. (Specific area is "RIET19N sections 27, 28, 29, 30, 31 and section 26 on the west side of Hatcher Pass Road.

**SUPPORT as it closes 14a to the use of motorized vehicles in hunting.**

**Proposal 194 and 195. Oppose.** These proposals would authorize a twelve month hunting season for coyote throughout all of Region II. There would be no bag limit. It is not clear from the two proposals, but it appears that the proposers, the Wild Sheep Foundation and the Anchorage Advisory Committee, would have the Board authorize coyote hunting, twelve months, 24/7 in areas generally closed to hunting: for instance, the Anchorage Management Area. The grounds for these extraordinary proposals are that purported threat of coyotes to sheep, and yet coyotes and sheep coexisted in Alaska for millenia without hunters protecting the sheep. If the Board is to adopt these radical proposals, care should be taken so that hunters do not hunt coyotes in areas heavily used by hikers: for instance, trails on the Anchorage Hillside, the Eagle River/Crow Pass trail, etc.

**Proposal 196. Opposed.** The AWA opposes this measure.

**PROPOSAL 197 - 5 AAC 92.165. Sealing of bear skins and skulls.**

Modify the black bear sealing requirement for Region II Units as follows.  
Exemption of sealing requirements for black bear harvested for human consumption by individuals not living on the road system.

**OPPOSE** as it eliminates effective statistic collection in black bear take in Region II.

**PROPOSAL 198 - 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent; lures.**

Clarify and modify guided black bear baiting requirements for Region II Units as follows:

**Option 1: "Wyoming System"** A registered guide-outfitter may register and maintain up to two bait stations per contracted client annually. A licensed guide must accompany a client to the bait station and remain in contact (radio or otherwise) at all times.

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**Option 2:** A person may contract with a registered guide-outfitter to establish and maintain their bait stations

OPPOSE as it increases use of bear baiting by guides.

.....  
**PROPOSAL 199 - 5 AAC 85.015. Hunting seasons and bag limits for black bear.** Lengthen the bear baiting seasons for Units 7, 14, 15 and 16A as follows. Areas open for bear baiting in Units 7, 14A, 14B, 15 and 16A: April 15 - June 30.

OPPOSE as it increases black bear take especially when sows may have cubs nearby but unnoticed.

.....  
**PROPOSAL 200 - 5 AAC 92.125. Predation Control Areas**

**Implementation Plans;**

**85.015. Hunting seasons and bag limits for black bear; and 5 AAC**

**85.020. Hunting seasons and bag**

**limits for brown bear.** Amend the bag limits for bear as follows:

Black and brown bears taken in intensive/predator management areas in which they have been identified as a cause of the decline in game populations and in which seasons and bag limits have been liberalized to reduce bear numbers for the purpose of increased prey populations will not count against the annual bag limit in other units.

**OPPOSE** as it basically legitimizes an all-out assault on bears by giving "free bears" to hunters.

.....  
**PROPOSAL 201 - 5 AAC 92.130. Restrictions to bag limit.** Require a

wounded brown bear to count against the bag limit as follows.

Wounding (drawing of blood) constitutes harvest of brown/grizzly bear in Units 6, 7, 9, 10, 15, and 17. If an animal is wounded, the hunter may continue to hunt for that animal but not another.

**SUPPORT** for it codifies the responsibility of hunters in regards to wounded bears.

.....  
**PROPOSAL 202 - 5 AAC. 92.015 Brown bear tag fee exemption.**

Reauthorize the current resident tag fee

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exemptions for brown bear in Units 9B, D, E, 11, 13, 16, and 17.

(a) A resident tag is not required for taking a brown bear in the following units:

- (1) Unit 11;
- (2) Unit 13 and 16(A), that portion outside of Denali State Park;
- (3) Unit 16(B);

...

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

- (1) Unit 9(B);
- (2) Unit 9(E), that portion including all drainages that drain into the Pacific Ocean between Cape Kumliun and the border of Unit 9(D) and Unit 9(E);
- (3) Unit 17

OPPOSE as it represents loss of revenue to the department at a time when budgets are being restricted.

.....  
**Proposal 203.** AWA offers no comment on this proposal.

**Proposal 204. Supports.** AWA supports this proposal.

**Proposal 205. Supports.** This is complex, but a very interesting concept.

**PROPOSAL 206 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Establish an archery moose

season for Units 7, 9, 11, 13, 14, 15 and 16 as follows:

Split the limit into two seasons:

1st season - September 20 to September 30

2nd Season - November 1 - November 10, and delete current early season

Also, make moose hunters choose to either hunt by rifle or bow (not both).

This can be done when purchasing their hunting license.

**SUPPORT as long as it does not change bag limits.**

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**PROPOSAL 207 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Establish a youth moose

hunt in various Region II Units, as follows:

I propose that the Board of Game authorize an "any moose draw, youth hunt" for Units 9, 11, 13, 14, 15, and 16 as follows: Starting the first Saturday after Christmas break, and continuing for the next 10 days. This hunt would be open to all youth age 10-16. These tags should be in addition to the tags that are currently being issued. Hunts in Unit 14C, should be under the direction of a professional guide or the Department of Fish and Game

NEUTRAL though provision removing tags for this purpose may cut into subsistence needs.

.....  
**Proposal 208. Oppose.** This proposal would entirely eliminate the issuance of a few permits to hunt ewe sheep, in Units 7 and 14, instead restrict the taking of sheep to only full curl males. This proposal ignores the process of evolution discovered by Charles Darwin more than a century ago: namely, natural selection. In short, the Alaska Chapter Foundation of North American Wild Sheep for the sake of so-called "traditional" hunting, would continue to target the large, strong male breeding population, thus giving a breeding advantage to the smaller and weaker males. Alaska's wildlife heritage should be preserve by responsible management. It appears that the issuance of a limited number of permits for ewes is a responsible effort by the Department to remove some of the presure on the male breeding stock, and for that reason the Department should be supported.

**Proposal 209. Oppose.** This proposal is also by the Alaska Chapter of the FNWS, and would require that only full curl male sheep be taken. For the reasons expressed above, this proposal is destructive, and should not be adopted.

**Proposal 210. Oppose.** This proposal would establish an archery only hunt for sheep throughout Region II. While the AWA supports archery hunts because they incorporate high fair chase values, nevertheless, this proposal would restrict permit holders to full curl rams only. For the reasons expressed above, the targeting of full curl rams is a bad idea.

**Proposal 211. Support.** This proposal would establish archery only permit hunts after the close of the regular season. It appears that permit holders would not be required to take full curl rams. Archery only hunts place high value on fair chase ethics, and this proposal (because it is not restricted to full curl only) would do no damage to the gene pool. For these reasons, the AWA supports it: provided that areas otherwise closed, such as the Anchorage Management Area, are not opened.

Proposal 212. No comment.  
Proposal 213. No comment.

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Proposal 214. No comment.  
Proposal 215. No comment.

**Proposal 216. Oppose.** This proposal is another proposal by the Alaska Chapter of the FNWS to require that only full curl male sheep may be taken. For the reasons expressed above, this proposal should be rejected, and permits issued for smaller males, and a limited number of females; with the proviso that permit numbers be limited so that populations not be decreased by over hunting.

Proposal 217. No comment.  
Proposal 218. No comment.  
Proposal 219. No comment.  
Proposal 220. No comment.

**Proposal 221. Support.** This proposal would modify the same day airborne restriction for hunting moose, caribou, sheep, and other game (except predators) throughout Region II. Currently, a hunter may not shoot an animal until 3 a.m. the day following his flight in. This is reportedly abused by hunters spotting animals late in the evening from a plane, landing, and shooting them early the next morning. This proposal would extend the start time to noon the next day, and deserves support as advancing fair chase ethics.

**Proposal 222. Support.** This proposal would require hunters to be at least 50 feet from their vehicles (cars, trucks, etc.) before shooting, and thus advances fair chase ethics.

**Proposal 223.** AWA offers no comment.

**PROPOSAL 224 – 5 AAC 85.015. Hunting seasons and bag limits for black bear.** Modify the regulation restricting the taking of white-phase black bear in Unit 1D as follows: We strongly recommend the Board of Game to direct the Department of Fish and Game to work with legal and regulatory staff to develop language which will be enforceable in a court of law to the effect of **“A light-phase black bear that has cream coloration (or lighter) over more than 30% of its body may not be taken regardless of any other coloration.”**

SUPPORT as this is a rare color form of the black bear not found anywhere else and should be protected on that merit as well as for cultural reasons.

.....  
PROPOSALS 225 and 226 deal with re-authorization of antlerless moose hunts in parts of the state. Proposals are being made by Dept. F&G.

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SUPPORT as the populations seem to allow such hunts.

.....  
**PROPOSAL 227 – 5 AAC 92.015(a) (8) & (9) and 92.015 (b) (4), (7), (8) & (10) Brown bear tag fee**

**exemptions.** Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A.

(a) A resident tag is not required for taking a brown bear in the following units:

...

(8) Unit 22;

(9) Unit 23;

...

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

...

(4) Unit 18;

...

(7) Unit 22;

(8) Unit 23;

...

(10) Unit 26(A).

OPPOSE as it represents a loss of revenue at a time when state budgets are being restricted.

.....  
PROPOSALS 228 and 229 re-authorize antlerless moose hunts in parts of the state and are being proposed by the Dept. of F&G.

SUPPORT as the populations seem to allow such hunts.

.....  
**PROPOSAL 230 - 5 AAC 92.025. Customary and traditional uses of game populations** Revise the

Amount Necessary for Subsistence for moose in Unit 18.

The Alaska Board of Game is requested to work with the department toward revising the existing Unit 18

Amount Necessary for Subsistence (ANS) for moose that is based upon the amounts needed for all the communities in Unit 18.

AK Wildlife Alliance

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SUPPORT as it provides needed data to determine bag limits.  
.....  
PROPOSALS 231 and 232 re-authorize antlerless moose hunts in parts of  
the state. Proposed by Dept. of F&G.

SUPPORT as populations seem to allow such hunts.  
.....  
**PROPOSAL 233 – 5 AAC 92.015. Brown bear tag fee exemptions.**

Reauthorize the current resident tag fee  
exemptions for general season brown bear in Units 19A, 19D, 20D, 20E  
(that portion outside of Yukon–  
Charley Rivers National Preserve), 21B, 21D, 21E, 25C, and 25D; and  
reauthorize the current subsistence  
registration permit tag fee exemptions for brown bear in Units 19A and 19B  
(downstream of and including the  
Aniak River drainage), 21D, and 24.

(a) A resident tag is not required for taking a brown bear in the following  
units:

- ...
- (4) Unit 19(A) and Unit 19(D);
- (5) Unit 20(D);
- (6) Unit 20(E), that portion outside of Yukon–Charley Rivers National  
Preserve;
- (7) Unit 21(B), Unit 21(D), and Unit 21(E);

...

(10) Unit 25(C) and Unit 25(D).

(b) In addition to the units as specified in (a) of this section, if a hunter  
obtains a subsistence registration  
permit before hunting, that hunter is not required to obtain a resident tag to  
take a brown bear in the following  
units:

- ...
- (5) Units 19(A) and 19(B), that portion downstream of and including the  
Aniak River drainage;
- (6) Unit 21(D);
- ...
- (9) Unit 24;

OPPOSE as it represents a loss of revenue at a time when state budgets are  
being restricted.  
.....

AK Wildlife Alliance 25 of 28  
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**PROPOSAL 234** re-authorizes antlerless moose hunts in sections of GMU 20. Proposed by Dept. of F&G.

SUPPORT as populations seem to allow such hunts.

.....  
**PROPOSAL 235 - 5 AAC 92.125(e). Predation control areas implementation plans.** Extend the Unit

19A predator control plan as follows:

The predator management program for Unit 19A will be reauthorized for six years. This program will start July 1, 2009 and expire June 30, 2015. The reason for this number of years is that the program will then expire on a year when Unit 19 will be on the Board of Game meeting cycle.

STRONGLY OPPOSE as it is a continuation of aerial hunting.

.....  
**PROPOSAL 236 - 5 AAC 92.125(f). Predation control areas implementation plans.** Extend the Unit 19D

predator control plan as follows:

Extend the wolf control program in Unit 19D for another five years. If the population goals are reached before the end of this period it can be ended. The wolves will not be threatened by this action because they will quickly learn to take advantage of the denser cover. The number of permittees who want to hunt here will also be low but some harvest of wolves is better than no harvest. It will also slow the recovery of wolf packs in the Experimental Micro Management Area (EMMA) to better insure that moose population goals are reached.

**STRONGLY OPPOSE as it is a continuation of aerial hunting. (Too, if as the proposal disingenuously argues, the wolves will quickly learn to use cover then it is useless to have it in place.)**

.....  
**PROPOSAL 237 - 5 AAC. 92.125. Predation control areas implementation plans.** Modify the predation

control plan for Unit 20E to provide the following:

Under a bear control permit, allow the following: 1.) taking of all sex-age classes of both brown and black bears; 2.) the use of bear snares for taking bears; 3.) taking of bears same-day-airborne; 4.) sale of tanned and

AK Wildlife Alliance

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Public Comment # 44

untanned hides and skulls from bears taken in the control program. Establish a working group to develop recommendations on methods, means and protocol for carrying out the bear control program. This working group should include members of local advisory committees, public sportsman's organizations including the Alaska Outdoor Council, and the Department of Fish and Game research and management staff.

**STRONGLY OPPOSE** as this constitutes all-out slaughter allowing any bear of any age or sex to be taken by snare and other normally repugnant means.

.....  
**PROPOSAL 238 - 5 AAC 92.125. Predation control areas implementation plans.** Amend the regulation

to provide the following:

Adopt a wolf predation control plan for Unit 21E which can be implemented right away instead of waiting two more years for the Board of game to meet after the intensive management plan has been drafted and adopted.

**STRONGLY OPPOSE** as this institutes aerial hunting in yet another section of the state.

.....  
**PROPOSAL 239 - 5AAC 92.125. Predation Control Areas**

**Implementation Plans.** Establish a Unit 21E

predation control implementation plan as follows, with a delayed effective date of July 1, 2010 and with

implementation of wolf control activities only if the moose population declines below the current level. The

Adaptive Plan for Intensive Management of Moose in Unit 21(E) that is referenced in the proposal will be

available for review on the department's web site in late January 2009.

**STRONGLY OPPOSE..**see above opposition for Proposal 238.

.....  
**PROPOSAL 240 - 5 AAC 92.050. Required permit hunt conditions and procedures.** Increase the number

of drawing permit hunts that hunters can apply for each year.

**NEUTRAL** as long as bag limits are not increased to allow for this suggestion.  
.....

AK Wildlife Alliance

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**PROPOSAL 241 - 5 AAC 92.050. Required permit hunting conditions and procedures.** Establish a bonus point system for some drawing hunts.

(4) permit issuance:

(A) the department shall issue registration permits in the order applications are received and

drawing permits on a lottery basis: **the department may issue drawing permits on a bonus point system as follows:**

**SUPPORT** as long as bag limits are not increased to allow this proposal to exist.

.....  
**Proposal 242. AWA is grateful to America's veterans.** However, the proposal needs explanation and detail. The proposal is unclear.

**Proposal 243. Support.** This proposal would give the Department discretion to issue special permits to disabled veterans in select special management areas, including Fort Richardson, the Fairbanks Management Area, the Delta Junction Management Area and perhaps others, including Elmendorf Air Force Base. The AWA supports responsible programs such as permit only hunts for disabled veterans. This appears to be such a program.

**Proposal 244. Support.**

**PROPOSAL 245 - 5 AAC 92.003. Hunter education and orientation requirements.** Require archers hunting black bear over bait to be IBEP certified statewide.

**SUPPORT as certification should benefit all involved.**

.....  
**PROPOSAL 246 - 5 AAC 92.010. Harvest tickets and reports.** Require black bear harvest tickets in any unit where black bear sealing is required.

**SUPPORT to maintain accurate data collection by F&G.**

\*\*\*\*\*  
\*\*\*\*\*

*AK wildlife Alliance*

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**44**

Public Comment # \_\_\_\_\_

FEB 13 2009

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J. Sherry Wright  
South Central region  
333 Raspberry Road  
Anch. Ak. 99518.

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FEB 13 2009

Mahatma Gandhi

BOARDS  
ANCHORAGE

The only place wildlife exists is where we allow them to live.

You are leaving a trail of blood, guts and agony for the cutters we are meant to protect.

This is a small world and perhaps animal control is necessary, but it must be done with consideration for all animals.

If you don't take a more middle of the line approach, when you are replaced we will only swing the other way. Perhaps to a fault. Balance is crucial.

Our governor doesn't have the common sense to select a diverse group to do this most important job. So you must use balance - God has taken care of this earth way before the Board of bases and did a good job.

I cannot express the <sup>and unfair</sup> despair I feel for so much misery <sup>and unfair</sup> and do not wish you luck in your endeavor - <sup>personal +</sup> professional.

You love what you understand  
You understand what you are taught

Em Milkerantz 140 Eagle St #202 Anchorage, Alaska  
p182

I can perhaps be convinced to get pups in their dens if you include the pups? - I will NEVER condone aerial hunting. IT JUST AIN'T FAIR

I do thank you for allowing the M.A.S.P. to...

-2-

I can perhaps be converted to 'gas' pup in their den. But I can NEVER condone aerial hunting, poisoning or buting. It just isn't fair. Its not sportsman like and we as a people are better than that.

Thanks Emma Milkeraitis

If we can go to the moon we can humanely do animal control.

Emma Milkeraitis  
p 2 of 2

2nd page was to ensure written comments in the margin would be included for boards -

02/13/2009 15:16 FAX

001

February 12, 2009

Attn: Sherry Wright  
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 333 Raspberry Road  
 Anchorage, AK 99518-1599

Fax: (907) 267-2489  
 Fax (907) 465-6094

Subject: Comments on the 2009 Alaska Board of Game Proposals

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FEB 13 2009

BOARDS  
ANCHORAGE

Attn: Scott  
 BOG  
 Public Comment

I am a chemist and biologist who has lived and worked in the remote and cities of Alaska for thirty years. I believe in wildlife conservation and science-based wildlife management. This letter expresses my opinion about some of the proposals upon which the Board of Game will be voting at its March 2009 Anchorage meeting.

I think many of the proposals are excessive, unscientific and are also unjustified attempts to benefit hunting groups and monies and continue the state's extreme predator control. I sincerely believe that the results of these proposals will have negative, lasting consequences for Alaska's wildlife, for Alaska, for Alaskans, in the present and future.

I urge you to VOTE NO on:

\* Proposals 76, 130, 131 and 135, which seek to increase brown bear hunting in Units 7, 13 and 15.

\* Proposals 49, 50, 68 and 69, which seek to create a new predator control program aimed to reduce brown bears and wolves in Units 9 and 17. This proposal is based solely upon anecdotal evidence, not research!

\* Proposal 75, which would allow brown bears in Unit 13 to be taken over bait stations, and also on Proposals 166 and 171, which would modify the predator control program in Unit 16B to allow baiting of brown and black bears all summer and allow the use of snares and traps to take black bears. The extreme means of harvest in this Unit has already been shown to be ineffective -- this should be revoked, not further liberalized. Bear baiting during the summer months will only compound the problem of nuisance bears by habituating bears to human food and further compromise public safety and private property.

\* Proposals 189 and 192, which would allow helicopters to transport hunters to the Unit 16B predator control area, authorize the baiting of bears in the summer and, for the first time ever, permit private citizens to use helicopters to access remote areas in order to kill wolves and bears.

Barbara Reilly p 1073

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\* Proposal 168, which would allow same-day aerial hunting of black bears in Unit 16 and allow helicopters to be used to transport hunters including, for the first time ever, out-of-state hunters to remote locations, without imposing any bag limits! This proposal also, for the first time, seeks to allow youth to participate in predator control programs. I strongly object to both of these measures. The state predator control programs require all individuals who participate to sign a legally binding agreement, and minors cannot sign such agreements. I strongly object to recruitment of youth to help carry out the state's current objectionable, controversial program!

\* Proposal 170, which would allow trapping and snaring of bears in Unit 16 under a predator control permit. The public has always opposed snaring of bears and this practice has long been prohibited in Alaska with good reason. Steel leg-hold traps large enough to hold bears are a danger to people, pets and other non-target wildlife like caribou and moose. In addition, this capture method raises serious ethical concerns. Bears wounded in snares or traps could escape, resulting in a prolonged, inhumane amount of suffering. Please reject this proposal!

\* Proposals 125 and 128, which seek to create predator control programs in Units 7 and 15 and allow black bear hides and skulls to be sold, which would only promote the illegal harvest of bears for profit and go against the recommendations of State Wildlife Troopers. In addition, allowing the sale of bear parts has not been effective in increasing black bear harvest, as evidenced in Unit 16.

\* Proposals 132 and 153, which would threaten Kenai Peninsula brown bears by eliminating their status as a species of special concern.

\* Proposal 237, which would allow brown and black bears, including sows and cubs, to be killed using snares and same-day airborne hunting in Unit 20E. This proposal flies in the face of decades of tradition where cubs and mother bears have been protected from hunting and will undoubtedly be unpopular with the majority of Alaskans. We should continue to protect bear cubs and sows in Alaska. In addition, snares are indiscriminate and can catch many non-targeted species, including moose, and if a cub gets caught in these traps, the danger to the public posed by its mother could be severe. This proposal would also establish a working group to recommend additional actions to further reduce bears in this area. If a working group is established, we strongly request that the Board will include representatives from the scientific and conservation communities.

\* Proposal 239, proposed by the Alaska Department of Fish and Game (ADFG), which would establish a new predator control program targeting 80% of the wolves in 8,000 square miles of Unit 21E (Proposal 239) -- even though they have no reliable data on how many wolves are in the area! How can the ADF&G claim that predator control is justified or assert that state personnel will not shoot the remaining 20% of the wolves if they don't know how many wolves are there to begin with?

\* Proposals 235 and 236, which would extend the predator control program in Unit 19A by six years and in Unit 19D (East) by five years, respectively. Neither program has ever

barbara kelly p 2 of 3

02/13/2009 15:17 FAX

003

been scientifically justified, and if the Board votes to continue them, it should conduct the studies necessary to prove that wolf predation is the main limiting factor for moose.

Proposal 190, which the ADF&G has put forward to allow state personnel to use carbon monoxide bombs to kill wolf pups in their dens. As you know, denning in general is incredibly unpopular with Alaskans -- using poisonous gas in order to conduct denning and elimination of wolf pups will be met with public outrage.

I want like to express support for several proposals which will have positive impact on Alaska wildlife and the wildlife-viewing public. These include proposals on the table to end lynx and wolverine trapping in Chugach State Park (Proposals 22, 24, 27, 28, respectively), other restrictions on trapping in the Chugach State Park (Proposals 20, 21, 23, 25, 26), and decrease the harvest of brown bears in Katmai, Lake Clark, Wrangell St. Elias and Denali National Preserves (Proposals 44, 45, 51, 77, 78 and 174). I also support Proposal 29 and 30 to modify the bag limit for black bear and Proposal 31, to delay opening of the black bear season as ADF&G has strongly advised that harvest of bears in this area has quadrupled and that killing of female bears is now exceeding 40%.

Close the brown bear hunting season in McNeil River. For years, this location has been a national and international attraction for bear viewing by thousands of tourists. However, McNeil River bear numbers have now already been seriously reduced by hunting pressure (Proposal 43).

Protect the rare white-colored bears. These beautiful animals are of spiritual significance to many Alaskans and provide viewing benefits to both to Alaskans and tourists from elsewhere. (Proposal 22)

Please support the great majority of Alaskans who care about responsible, science-based wildlife management.

Sincerely yours,

Barbara N. Reilly M.S.,  
Environmental Scientist  
1800 Parkside Dr.  
Anchorage, Alaska 99501

p 3 of 3



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## ATTN: Board of Game Comments

ADF&G Board Support Section

February 13, 2009

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Juneau, Alaska 99811-5526

Fax: 907-465-6094

Dear Board Members,

The Alaskan Bowhunter's Association recently held a meeting to discuss the Archery related proposals for your Spring 2009 meeting in Anchorage. The following are our positions regarding those proposals.

We have grouped similar proposals that relate to specific topics.

### Later Season for Archery Moose

Proposals #6, 100, 148, 176, 179, 182, 206 – Support with some comments

All of these proposals favor a later archery season for moose. The general consensus of bowhunters is that the mid August season for moose is bad because the bulls are still in velvet and that makes the identification of brow tines and spread difficult. The foliage is thick and the animals are not moving all of which makes hunting very difficult. Added to this is the problem of meat care in the warmer and wetter August weather. Many have proposed a late hunt in November for archery because that is well after the rut and meat care would be better and hunting might be easier because of snow and less vegetation. Moving the archery hunts to November would solve the concern about nonresident hunters having access to the moose before the resident general season opens expressed in prop#182. Of course, bowhunters would like a rut hunt for moose and if that was biologically reasonable even a drawing archery rut hunt would give increased opportunity to be in the field at a magic time of the Autumn. Bottom line is the bowhunters favor later archery seasons for moose.

### Black Bear Baiting Season extend to June 30<sup>th</sup>

Proposals # 73, 74, 127, 199 – Support

There is no biologic reason to stop baiting of black bear prior to June 30<sup>th</sup>. Black bear are not being over harvested. Parts of many units don't really get free from snow until late May and it may be difficult to get in to set up baits earlier. From hunting in units that allow baiting until June 30<sup>th</sup> we know that hides are still good

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(1)

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## The Alaskan Bowhunters Association, Inc.

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especially on the larger boars. In many areas we are trying to encourage increased black bear harvest to help with the problem of predation on moose calves so no real good reason to stop the baiting season early. Season dates should be uniform at least across several contiguous units for simplicity in regulations, enforcement and public understanding.

### Archery Sheep Drawing Permit hunts

Proposals #106,107, 210, 211 – Support

There is a nearly thirty year history of Archery Sheep Drawing hunts in unit 14C. The statistics show that these are highly desirable hunts which produce a very low success rate for the hunters who are actually drawn. So these hunts provide maximum hunter opportunity with minimal impact on the species. Two years ago when the new permit hunts were being discussed for units 13 and 14 bowhunters were of the understanding that there would be some dedicated archery drawing hunts created but in fact there have not been. We are now asking for some dedicated archery hunts in any areas which have drawing permit hunts. This should not be viewed as an allocation to a special interest group. It is actually a limitation of method and means which would allow more individual hunter opportunity with less impact on the target species.

### Wounded equals taken

Proposals # 29 & 201 – Oppose

We would strongly support this type of regulation if the word mortally was inserted in front of wounded. However, as written, we can not support it. It is difficult to legislate ethics. This regulation would require that an ethical bowhunter who, after nicking a bear and finding a drop of blood on his arrow, would have to quit hunting; while a rifle hunter who shot at a bear at 200 yards and didn't see the bear fall down and didn't go follow up or could not find any blood would assume that he missed and continue to hunt. It would be very difficult to enforce. Why write essentially unenforceable regulations? The APHA eventually wants to extend this regulation to all species statewide. It would be a real hardship on subsistence hunters if they had to stop hunting after superficially wounding an animal. It raises dilemmas such as; a hunter wounds a brown bear one year but does not collect it, is he not allowed to hunt bear during the next four years? If he is allowed to hunt the next year and kills the same bear that he wounded the year before since he already counted it as bagged last year when can he hunt brown bear again? If I wound a deer on Kodiak but do not collect it

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(2)

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and then kill the same deer the following year am I still allowed three more deer in that year since I actually counted the deer against my bag limit in the previous year?

### New Archery Permit Hunts -- Various Species

Proposals #1, 3, 131, 162, 177 – support

Whenever there is a limited population of a species to the extent that there can not be a general season hunt we support having some archery hunt. This could be in an area where for safety reasons firearms are not allowed. Or it could be in an area where only a limited number of animals can safely be harvested. If a species is either not hunted or is hunted on drawing hunts only we would like to see some specific dedicated archery permits. For example if ADF&G determines that twenty moose can safely be harvested in a given area. They may know that they can anticipate that gun hunters will have a 50% success rate, while bow hunters might only have a 20% success rate. So to kill twenty moose they could give permits to 40 gun hunters or to 100 bowhunters. A better solution might be to give thirty permits to gun hunters (expect to kill 15 moose) and give permits to 25 bow hunters (expect them to kill 5 moose). By giving at least some dedicated archery permits you can increase the number of people who have the opportunity to hunt. This should not be considered an allocation issue because essentially anyone can learn to bow hunt if they so desire. You are allowing more participation by limiting the means of harvest. This is analogous to fly fishing only areas for fishing. With regard to the specific species (brown bear, elk and cow moose) in the above proposals we do not have the biologic data to know if any hunts are justified. We would leave that decision to ADF&G.

### Bonus Point System

Proposal # 241 – support

We would suggest squaring the number of bonus points for those wishing to participate in the 50% bonus point side of the drawing. So that way people who had been applying longer would have exponentially greater chance of drawing.

Thanks for your consideration of our comments,

John Frost Legislative Vice President of The Alaskan Bowhunters Association

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(3)

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Public Comment # 47

# CARING FOR KNEES

JOHN D. FROST, MD



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### Facsimile Cover Sheet

Date: 2/13/09

To: ADFG BOARD OF GAME  
Board Support Section

Fax #: 907-465-6094

From: Alaska Bowhunters Association

Fax#: (907) 562-5742

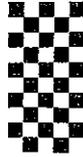
Message:

Board of Game  
Comments for Spring  
Meeting in Anchorage

Number of Pages (Including Cover Sheet): 4

#### HIPAA PRIVACY RULE CONSENT, INFORMATION DISCLOSURE, AND INSURANCE AUTHORIZATION

All information provided by the patient is deemed private under the Health Insurance Portability and Accountability Act (HIPAA) and will be used only with patient consent. In accordance with separate patient consent form on file, John D. Frost, M.D. APC is authorized to furnish information to other providers, health care or treatment facilities, and insurance companies for purposes of treatment, payment, and health care operations.



Comments on Proposals 42-45 by Bear Viewing Association

**TO: ATTN: BOG COMMENTS**  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-465-6094

**FROM: BEAR VIEWING ASSOCIATION**  
39200 Alma Ave  
Soldotna, AK 99669  
Ph/Fax 907/260-9059

**DATE: 13 February 2009**

**COMMENTS ON PROPOSALS 42-45. 4 pages**

**PROPOSAL 42 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Delay the brown bear hunting season in Unit 9C as follows:  
Delay opening of the brown bear hunting season until October 15 rather than the current date of October 1 in the Katmai Preserve (UCUs 0703 and 0702) of Unit 9C.

**SUPPORT**

**PROPOSAL 43 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Close brown bear hunting in a portion of Unit 9C as follows: Funnel Creek, Moraine Creek, and Battle Creek drainages are closed to the sport hunting of brown bear from their headwaters to Kakaklek Lake.

**SUPPORT**

**PROPOSAL 44 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Modify this regulation to provide the following:  
Remainder of Unit 9C: 1 bear every four years by drawing permit only.

**SUPPORT**

**PROPOSAL 45 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Amend this regulation for portions of Unit 9C as follows: Remainder of Unit 9C: Both residents and nonresidents - open season is May 10 to May 25 (even years only).

**SUPPORT**

Public Comment # 48

## Comments on Proposals 42-45 by Bear Viewing Association

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## RATIONAL FOR SUPPORTING PROPOSALS 42-45

I have been researching bear ecology and behavior since 1969. I first studied bears at Katmai National Park in 1972, then resumed study in 1998, where my studies have continued through summer 2008. From 1998-2007, it was not uncommon to have 30-40 grizzly/brown bears visible at any given time during the mating season at Hallo Bay, on the Park's central coast. This past mating season, by contrast, it was rare to have even 20 bears in view, and common to have fewer than 15 in view. Bear numbers were also abnormally low during rest of the summer. We estimated that the average number of bears seen was less than half of what were observed during any other year over the previous decade.

From 1998-2007, bears at Hallo during the mating season always included several prime-aged adult sows, as well as several adolescent sows. During the 2008 mating season, by contrast, the only sows that showed up were adolescents – ones that had completed puberty but were still physically and behaviorally immature, analogous to girls in their early teens.

From 1998-2007, it was common to see numerous litters of 1<sup>st</sup> and 2<sup>nd</sup> year cubs, as well as a litter or few of 3<sup>rd</sup> year cubs at Hallo and at Geographic Harbor, as well as smaller numbers of litters in intermediate bays. During 2008, by contrast, only 1 litter of 1<sup>st</sup> year cubs and 2 of 2<sup>nd</sup> year cubs were seen along that entire stretch of coast.

These events, coupled with observations farther up the coast (e.g., at McNeil and beyond) indicate that there has been a substantial decline in the number of bears, in reproductive rate, and in survival rate, along the coast. The cause of this is unknown, and no single causal factor seems likely to be "at fault." Among possible factors are:

*Viewer impacts:* Unlikely to be a cause, given that bears which disappeared included numerous individuals which had become highly acclimated to viewers, to the point where viewers are either ignored or occasionally sought when a sow wants to nurse cubs or sleep without disturbance by other bears. These bears get no food from people.

*Bears migrating to the Bristol Bay Drainage to partake of increase salmon numbers there:* This hypothesis was suggested by me by the biologist who replaced Dick Sellers (pardon me for not recalling his name). Although sows normally do not make long migrations, it is possible if food sources are consistently poor in their home range. Indeed, salmon runs on some areas of the coast have diminished, perhaps due to illegal fishing activity (as observed by bear viewers, but unfortunately not documented rigorously enough for prosecution). Longer migration, over hazardous terrain, coupled with malnutrition, could well account for some reduction in production and survival of cubs. Given that these migrations.

*Legal harvest:* One hazard along the way is hunting. A combination of increased numbers of acclimated bears being exposed to hunters, combined with increases in limits of sport and subsistence harvests, could be substantially impacting these bears.

## Comments on Proposals 42-45 by Bear Viewing Association

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Note: During August or September a few years ago, I flew the coast from Iniskin Bay south to McNeil and back again. The only bears seen along that entire stretch of coast as one sow with a yearling at McNeil – despite the fact that rivers and streams north of McNeil had heavy salmon runs. We followed each stream from the ocean to its headwaters, without seeing any bears. This is in stark contrast to earlier years when I consistently saw numerous bears on each of these streams.

These observations and other circumstantial evidence suggest that bear numbers along the coast have declined greatly in recent years due to a combination of emigration, lower reproduction, and lower survivorship. Lower survivorship of cubs could be due mostly to nutritional stress and to the dangers of crossing rivers and other hazardous terrain. But reduced survivorship of adolescent and adult bears would more likely be a consequence of increased harvest pressure.

This indicates that the coastal population (which is obviously not closed), is not being managed on a sustainable basis – that areas adjacent to protected areas have become a population sink.

I therefore strongly urge the Board to reduce bear harvest at least to historical levels until recent variations in bear numbers is understood well enough to restore sustainability.

I also urge the Board to basis its criteria of sustainability not just on the number of bears (of each gender and age) of each species present within the GMU, or even just within each subunit. Rather, management should be based on much smaller land areas in accordance with how this resource is utilized by the public.

This region is the global center of bear viewing. It is utilized by over 10,000 viewers each summer. Bear viewing contributes an estimated \$100-\$200 million annually to Alaska's economy, especially to SouthCentral.\* Declines in numbers of viewable bears is beginning to exert strong adverse impacts on the industry. (There is, of course, a few-year time lag between declines in bear numbers and declines in customer numbers, as news of poorer viewing opportunities ripples through the customer base). Hunting impacts add insult to injury from the current global financial crisis and may soon threaten substantial financial losses to viewing guides, tour companies, air and water taxi services, lodges and motels, restaurants and grocery stores, sporting goods stores, and other businesses the serve viewers.

\* Expenditures for viewing trips generates roughly \$25-\$30 million statewide each year.

\* Viewers spend additional money for lodging, meals, transportation, equipment, supplies, etc. And, of course, viewers do other activities such as fishing, sightseeing, etc. Many of these viewers would not come to Alaska to do these other activities but for the viewing opportunities.

\* So total direct expenditures are assumed to run \$50-\$75 million per year.

\* Economists common assume that the average dollar entering a local economy passes through three financial transactions, and thus has a triple stimulus effect. Hence, a direct

Public Comment #

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**Comments on Proposals 42-45 by Bear Viewing Association**

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expenditure of \$50 million would have a net economic benefit of \$150 million, and thus a proportionate tax benefit (sales tax, etc.)

On this basis, we estimate that a minimum value of \$100 is at risk from current policies which adversely impact bear viewing. The specific impact of declining bear numbers in the Katmai Preserve are much harder to estimate. But a loss of \$10 million annually would not be unreasonable as a rough estimate.

The Bear Viewing Association thus urges the Board of Game to alter regulations as necessary to minimize hunter impact on these bears and to conserve those individual bears which are most readily and safely viewed. (Viewing in this sense means that the animal can be observed for hours on end, going about its normal life activities, without significant disturbance by people, within photographic distances.)

As a final point: Most serious bear attacks are inflicted by grizzly/brown bears, and most of these attacks are defensive, not offensive – e.g., as documented through the research of Dr. Steve Herrero, Andrew Higgins and Tom Smith. Hunting bears makes them both shyer of people and more dangerous when encounters occur. Delaying hunting until after viewers are gone for the year would help minimize attack risk.

Proposals 42-45 are all reasonable ways of helping achieve these goals.

Stephen F. Stringham, PhD (PhD Ecology @ UT, MSc Wildlife Mgmt @ UAF)  
Director – Bear Viewing Association  
Director – Bear Communication & Coexistence Research Program  
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## Comment Sheep Proposal #218

I am very much in favor of this proposal. Many residents either hike or 4 wheeler in to hunting areas w/o the ability to scout by air as many guides are able to do for their clients. This proposal would give the resident sheep hunter a chance to access the hunting area do the scouting on foot and hopefully harvest a legal sheep before the onslaught of non-resident <sup>guided</sup> sheep hunters can legally hunt. This would eliminate many of the conflicts occurring between guides and resident hunters hunting in the same area. Management of ~~resource~~ resources is supposed to be for the maximum ~~best~~ benefit of the residents of Alaska.

CHUCK DERRICK  
891 SELDOM SEEN RD.  
FAIRBANKS, AK 99712  
PH 907-488-3093  
Chuck Derrick  
2-13-09

February 13, 2009

Re: Board of Game Southcentral Meeting  
Comments on 2009 Proposals

Provided by: Brian Mason  
Eagle River, AK

**Proposal #2 – Support**

I have lived in the Eagle River area for 30 years and have spent the past 15 summers hiking extensively throughout the Chugach Mountains in the Eagle River area. The population of brown bears in the area is substantial and can certainly support a moderate harvest.

**Proposal #3 – Support**

Like proposal #2, the area in question has a healthy bear population. Opening this area to bowhunting would provide additional opportunities for primitive weapon hunters with no threat to the resource.

**Proposal #6 – Support**

An additional archery hunt in unit 14C would make use of the harvestable surplus of moose in the area during a time of year when user conflicts would be minimal or non-existent. Early November is generally between hiking and skiing seasons, and those opposed to seeing such a hunt would not be in the field in substantial numbers. Overharvest would be highly unlikely, as the adjacent closed areas provide refugia for moose.

**Proposal #14 – Support**

Restricting the non-resident permit allocation for 14C hunts to no more than 10% is a reasonable compromise compared to the following proposals that address the same issue with even more restrictive measures. This will allow for greater resident participation while still providing non-resident tag revenue to Fish and Game and clients for guides who have traditionally hunted 14C.

**Proposal #18 – Oppose**

The annual average harvest of sheep in DS140 and DS141 are very low. This minimal harvest has no statistically significant impact on the overall health of the 14C sheep population. The opportunity provided to hunters in these unique, late season hunts is unmatched elsewhere. Restricting this hunt to full curl-only would provide little biological benefit at the cost of great opportunity.

**Proposal #29 – Support**

Counting a wounded bear as part of the bag limit would encourage hunters to take high percentage shots. It would protect the resource and public perception of hunting. There is no downside to this proposal at all.

**Proposal #115 - Oppose**

Alaska has the most fair and equitable drawing permit system in the nation. Going to a preference point system would discourage young hunters and those new to the pursuit from applying for hunts. There can be no improvement on a system in which every person has an equal chance.

**Proposal #129 – Oppose**

There is already very little hunting opportunity for brown bears in Unit 7. The harvest opportunity that exists can be met by resident hunters. If harvest objectives increase, there is already substantial unmet demand by resident hunters as evidenced by the number of applicants for the drawing permits. There will be absolutely no positive impact on the resource by adding non-resident hunters to the permit applicant pool.

**Proposal #142 – Support**

The continued taking of nanny goats is putting pressure on the population that would not exist if hunters were more selective in taking billies. This proposal would create a strong incentive to practice sex identification skills before going afield and would likely result in healthier, more productive goat populations on the Kenai Peninsula.

**Proposal #168 - Oppose**

The current ban on the use of helicopters is a hallmark of hunting regulations in Alaska. While it is difficult to regulate ethics, this single regulation is a foundational principal of fair-chase hunting. While black bear populations are high in unit 16, we are not to the point of a biological emergency. There are numerous other approaches to consider in order to increase the black bear take without allowing use of helicopters. Year-round baiting, increased bag limits, and other such approaches should be attempted before taking such a drastic measure. Airplane and boat access is already ample to the area in question, and these can be used without removing one of the underpinnings of fair chase hunting in Alaska.

**Proposal #169 – Support**

Any increase in youth involvement in hunting in Alaska is a positive thing. Encouraging youth hunters to hunt bears under the direct supervision of a permitted hunter will lead to an increase in harvest rates in an area with a harvestable surplus and an increased level of participation in hunting by young Alaskans in the years to come.

**Proposal #189 – Oppose**

The current ban on the use of helicopters is a hallmark of hunting regulations in Alaska. While it is difficult to regulate ethics, this single regulation is a foundational principal of fair-chase hunting. While black bear populations are high in unit 16, we are not to the point of a biological emergency. There are numerous other approaches to consider in order to increase the black bear take without allowing use of helicopters. Year-round baiting, increased bag limits, and other such approaches should be attempted before taking such a drastic measure. Airplane and boat access is already ample to the area in question, and these can be used without removing one of the underpinnings of fair chase hunting in Alaska.

**Proposal #192 – Oppose**

The current ban on the use of helicopters is a hallmark of hunting regulations in Alaska. While it is difficult to regulate ethics, this single regulation is a foundational principal of fair-chase hunting. While black bear populations are high in unit 16, we are not to the point of a biological emergency. There are numerous other approaches to consider in order to increase the black bear take without allowing use of helicopters. Year-round baiting, increased bag limits, and other such approaches should be attempted before taking such a drastic measure. Airplane and boat access is already ample to the area in question, and these can be used without removing one of the underpinnings of fair chase hunting in Alaska.

**Proposal #194 – Support**

There is no conservation concern regarding coyotes in SouthCentral Alaska. As an invasive species that did not inhabit the area until the early 1900's, coyotes have spread quickly and reproduce at a high rate. The current take under hunting and trapping licenses is small, and this proposal would allow an increased take without causing any threat to the current population levels. Any increased take would directly benefit prey species, particularly ungulate calves that are suffering increased predation by coyotes.

**Proposal #195 – Support**

There is no conservation concern regarding coyotes in SouthCentral Alaska. As an invasive species that did not inhabit the area until the early 1900's, coyotes have spread quickly and reproduce at a high rate. The current take under hunting and trapping licenses is small, and this proposal would allow an increased take without causing any threat to the current population levels. Any increased take would directly benefit prey species, particularly ungulate calves that are suffering increased predation by coyotes.

**Proposal #209 – Support**

There was no biological reason to change the sheep hunts in 13D and 14A to drawing permit only. Full curl harvest restrictions ensure a healthy population of breeding males while providing ample opportunity to hunters who desire to spend time sheep hunting each fall. While success rates may be somewhat lower under a harvest ticket system, participation is greater while still ensuring a biologically viable population. When there is no biological concern, hunter opportunity must be a priority.

**Proposal #210 – Support**

An early archery sheep hunt would provide increased hunter opportunity while causing an insignificant increase in the sheep harvest. Additionally, the demand for an archery sheep hunt when the weather is good and conditions are safer would lead to increased drawing permit revenue for Fish and Game at a time when the department is chronically under funded.

**Proposal #213 – Oppose**

This proposal would severely restrict resident hunting opportunity. As it stands, there is no biological threat to the sheep population in the units covered by this proposal. Full curl harvest restrictions ensure that a stable population of breeding rams will persist from year to year while allowing for a moderate harvest of mature rams. Moving all sheep hunting to drawing permit only will result in the loss of opportunity for many hundreds of residents that head afield each fall. Restricting opportunity to address a biological concern is valid, but there is no such concern in this case. What will be lost is the opportunity for parents to take their children sheep hunting every year, while the only possible gain is trophy quality for those who place a priority on such.

**Proposal #218 – Support**

This proposal would increase resident hunting opportunity with little biological effect. School districts statewide have moved to start dates in mid-August. As such, it is increasingly difficult for young hunters to accompany their families on hunts without missing important educational opportunities. This slight change in season start dates would dramatically improve opportunities for young hunters to experience time afield pursuing sheep.

**Proposal #240 – Oppose**

While this proposal sounds good on the surface, the end result will be negative. Under the current limit of three permit choices per species, hunters are forced to research areas closely to ensure that the hunts they are choosing are viable options to meet their desired goals. If the limit was increased to six, it is highly likely that hunters would give less thought to the hunts for which they are applying, and thus would end up winning hunts that they cannot logistically participate in. Already, internet hunting discussion boards are flooded each year

with those seeking the most basic of information on permit hunts after they have already won. Often permit winners find that the hunt they applied for is not what they initially thought, and thus the permits go unused. Lowering the incentive to research hunts prior to the draw is not the answer. Apart from this issue, increasing the limit to six would not appreciably increase anyone's odds of winning a permit in the more popular hunts, and it would in fact decrease the odds of winning for what are currently less popular hunts. Restricting people to three applications forces hunters to prioritize, and those willing to hunt less desirable areas in order to gain a higher draw rate are thus rewarded. This is an ill-conceived proposal in every way, other than the fact that it would provide increased revenue for Fish and Game.

**Proposal #241 – Oppose**

Alaska has the most fair and equitable drawing permit system in the nation. Going to a bonus point system would discourage young hunters and those new to the pursuit from applying for hunts. There can be no improvement on a system in which every person has an equal chance.



## Alaska Outdoor Council

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February 13, 2009 2005

Alaska Department of Fish & Game  
 Boards Support Section  
 PO Box 25526  
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Chairman Cliff Judkins and Alaska Board of Game Members:

On behalf of the Board of Directors and Alaska Outdoor Council (AOC) membership, thank you for this opportunity to submit comments for the Spring 2005 Board of Game Meeting. The AOC represents over 2,500 individual members and 47 outdoor clubs for a collective membership of 10,000 hunters, fishers, trappers, and individuals who access public lands.

AOC applauds the efforts of the department and Board to bring forth proposals whose actions once implemented will contribute to achieving the harvest goals, 5 AAC 92.108. Population and harvest goals of identified big game prey populations that have been found to be necessary for human consumptive use are the trigger when the board considers proposals to adopt regulations to provide for intensive management programs, AS 16.05.255(e)-(g). Harvesting big game for the benefit of gathering a sustainable, renewable, non-chemically supplemented meat source is extremely important to AOC membership.

AOC adheres to the State Courts opinions (Madison v. ADFG (Alaska 1985), McDowell v. State (Alaska 1989), State v. Kenaitze Indian Tribe (Alaska 1995)) that subsistence hunting & fishing privileges must be consistent with the Equal Access Clauses of the Alaska Constitution:

- Article I *Declaration of Rights*
  - Sec. 1. *Inherent Rights*,
- Article VIII *Natural Resources*,
  - Sec. 3. *Common Use*,
  - Sec. 15. *No Exclusive Right of Fishery*, and
  - Sec. 17. *Uniform Application*.

### AOC Recommendations:

**Proposal 3 - adopt.** Since State Parks has seen fit to ban the use of firearms for hunting in the Eklutna Lake Management Plan, which lays within the boundary of Chugach State Park and GMU 14C, this is an opportunity to provide archers with increased hunting area. Conservation of Brown bear is not a problem in GMU 14C.

## AOC Recommendations Spring 2009 BOG

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**Proposal 27 – Do not adopt.** Statutes creating Alaska's State Parks protects the traditional activity of trapping. AOC members and representatives participated in the legislative process to make sure hunting, trapping, and fishing activities were protected in statute on State Park lands and waters. AOC wasn't told that those protections would be nullified under DNR Safety Concerns because some of the public choose to say they now can't "view" wolverines. Wolverine should be allowed to be trapped consistent with Art. VIII, Section 4 Sustained Yield.

**Proposal 42, 43, 44 – Do not adopt.** ADF&G data does not show that brown bear are being harvested above sustainable rates. Are the Katmai National Park closures not enough in GMU 9C? The Katmai National Preserve accounts for less then 2% of GMU 9, individual brown bears range in and out of the Preserve. This is not an over harvest of bears that could lead to a significant lowering of the brown bear population in the Preserve.

**Proposal 51, 64, 67, 77, 78, 112, 174 and 186 – Do not adopt.** If the proposer of these proposals wants to go to court fine. These are insignificant land percentage of the State's Intensive Management Areas. I can find nowhere in ANILCA where it says big game populations are to be maintained at pre-ANILCA levels.

**Proposal 95 – Adopt.** With harvest over the ANS goal of 600 moose the department can eliminate Tier II in GMU 13. The area biologist would like to distribute any bull drawing permits in specific areas where high bull/cow ratios exist and where hunter effort has been low in parts of GMU 13A, B, and C to harvest excess bull.

**Proposal 96 – Public comment should not determine the "amount necessary for subsistence" ANS for moose in GMU 13.** The BOG determines the ANS on moose populations with a custom & traditional determination based on use patterns 5AAC 99.010(b) collected by Subsistence Division from household surveys. Household surveys of Alaskans who hunt moose in GMU 13 have only taken place in households of residents of GMU 11 and 13 since the mid-'80s. The BOG should have updated household survey data on the numbers of Alaskans who participate in GMU 13 Tier I moose hunts before reviewing the ANS for moose in GMU 13, in order to comply with current state law.

**Proposal 218 – Adopt.** AOC Board of Directors voted to support allowing resident Dall sheep hunters to have a 5 day head start over nonresidents in Region II. Sheep habitat in region II is economically assessable to the majority of the State's resident sheep hunters. The success rate for resident sheep hunters is about 1 of 4 and the success rate for non-resident sheep hunters is 3 of 4. Approximately 25% of Alaskans sheep hunters are successful and 75% of non-residents are successful. In 2007 non-residents took 44% of the sheep in Alaska. Sheep tags represent about 12% of the license revenue. Moose is 48%, and caribou is 21% both of which can be non-guided hunts. If the Board of Game wants to generate more money for the State they should work on dropping the guide regulation, raise the tags to \$2,500 and put all units on permit drawings for non-residents. This will generate a lot of money for the state because non-residents will be able to afford a sheep hunting trip where a \$15,000 guided hunt would be out of the question. License applications will go way up and the numbers can be controlled with non-resident permit areas. The commercial operators will use safety as an issue, but we have non-resident guides (who cannot legally hunt sheep in Alaska) guiding non-residents. If you retire in "the lower 48" and want to return to Alaska to hunt sheep, you will have to hire a guide because it is not safe. Other states have higher sheep tag fees than Alaska and do not require non-residents to use a guide.

## AOC Recommendations Spring 2009 BOG

Page 3

**Proposal 121 – Do not adopt.** Unless ADF&G Area Biologist have determined that the red fox populations in GMU 15 is being trapped at unsustainable levels. ANILCA didn't give the USF&W Service the authority to regulate the harvest of red fox on the Kenai NWR.

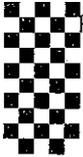
**Proposal 241 – Adopt.** AOC supports the bonus point system on drawing hunts. Bison is a good start.

**Proposal 190 – Adopt.** AOC supports predator control implementation programs that would work to achieve Population and Harvest Objectives established in 5 AAC 92.108.

Thank you for the opportunity to provide written comment on these proposals. I will attend the Spring 2009 BOG and make myself available to provide information and back recommendations on the remaining proposals during board deliberations.



Rod Arno  
Executive Director Alaska Outdoor Council  
FAX (907) 376-7197



February 11, 2009

Mike Soik  
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Anchorage, AK 99516

ATTN: BOG COMMENTS  
Alaska Department of Fish & Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK. 99811-5526

**Proposal #20**

Trapping near trails in Unit 14C,

I am **OPPOSED** to this proposal. The proposal is confusing as far as what part of Unit 14C they want this to apply to. They mention Unit 14C and also Chugach State Park, not all of Unit 14C is in Chugach State Park. Unit 14C has some very mountainous terrain and being forced to trap one mile from trails is not acceptable. It would force trappers out of many animals' habitats and winter travel would not be feasible or safe (avalanche danger), so I don't see how this would benefit trappers. I believe domestic animal owners are being irresponsible by not educating themselves about trapping in Alaska. They will take the time to learn about traveling in avalanche or bear country, but don't learn about traps, seasons, and how to recognize trapping activity.

**Proposal #21**

Trapping in Chugach State Park near community boundaries,

I am **OPPOSED** to this proposal. Unit 14C has some very mountainous terrain and being forced to trap one mile from community boundaries is not acceptable. It would force trappers out of many animals' habitats and winter travel would not be feasible or safe (avalanche danger). Depending on the terrain and snow conditions it may be difficult to walk/ski or not open to snowmaching. I believe recreational trail users and domestic animal owners are being irresponsible by not educating themselves about trapping in Alaska. They will take the time to learn about traveling in avalanche or bear country, but don't learn about traps, seasons, and how to recognize trapping activity.

**Proposal #22**

Trapping lynx in Chugach State Park, Unit 14C

I am **OPPOSED** to this proposal. There is no biological data to support this proposal.

**Proposal #23**

Trapping in Chugach State Park, Unit 14C

I am **OPPOSED** to this proposal. Unit 14C has some very mountainous terrain and being forced to trap 5 miles from roads is not acceptable. It would force trappers out of many animals' habitats and winter travel would not be feasible or safe (avalanche danger). There is not a public safety issue. I believe recreational trail users and domestic animal owners are being irresponsible by not educating themselves about trapping in Alaska. They will take the time to learn about traveling in avalanche or bear country, but don't learn about traps, seasons, and how to recognize trapping activity.

**Proposal #'s 24-28**

Wolverine trapping in Chugach State Park, Unit 14C

I am **OPPOSED** to these proposals. I believe that there is a harvestable surplus of wolverine in Unit 14C that can be controlled through season length, bag limit, and/or emergency closures. There is not a public safety issue. I believe recreational trail users and domestic animal owners are being irresponsible by not educating themselves about trapping in Alaska. They will take the time to learn about traveling in avalanche or bear country, but don't learn about traps, seasons, and how to recognize trapping activity. If wolverine trapping in Chugach State Park is closed I would like the state trapping season to match the federal trapping season (Nov 10 – Feb 28) in the remainder of Unit 14C, but as a minimum the state trapping season should return to Nov 10 – Jan 31 and the trapping restrictions and closures, which were implemented in Chugach State Park due to wolverine trapping, should be rescinded.

**Proposal #98**

Modify antler restrictions in Unit 13

I **SUPPORT** this proposal. The majority of mature bulls I see have only 3 brow tines and their antler widths are between 45 and 55 inches. This makes it very difficult to find a legal animal. There is an abundance of mature bulls that can be harvested if the antler restrictions return to spike-fork, 50 inch, or 3 brow tines.

**Proposal #'s 110 & 116**

Restrict the use of motorized vehicles and aircraft in Units 13 & 14

I **OPPOSE** these proposals. This proposal is not enforceable. I don't believe the Board has the authority to tell aircraft owners how often they can fly their aircraft, what altitude to fly, or where you can land if an area is open to motorized use. They want the ban to start 5 days before hunting season, but don't specify what season. It appears that they are concerned about sheep hunting, yet brown bear is open year round in Unit 13, so would this be in effect all year?

**Proposal #113**

Establish an experimental control area in Unit 13 predator control area

I **OPPOSE** this proposal. Scientific data is great, but I can attest to greater moose numbers since predator control has been implemented. Please don't disregard observations from the many private individuals that spend time in the field. Also, it doesn't make sense to start a control group this far into the predator control program. This looks like an attempt for groups that oppose predator control programs to selectively remove areas from the programs.

**Proposal #119**

Lengthen the trapping season for beaver in Units 7 & 15

I **SUPPORT** this proposal. I would like an increased opportunity for trapping beaver in Units 7 & 15.

**Proposal #121**

Close trapping season for red fox in Units 7 & 15

I **OPPOSE** this proposal. The information provided in this proposal is reason to reject it. They state that Kenai red fox have not been proven to be a unique subspecies and that most trappers will never catch a red fox on the Kenai Peninsula.

**Proposal #122**

Change season and bag limit for Marten in Unit 15

I **OPPOSE** this proposal. The majority of Unit 15 does not have a road system and does not have easy access. I don't believe there is any biological data to support this proposal.

**Proposal #123**

Change season and bag limit for wolverine in Unit 15

I **OPPOSE** this proposal. The majority of Unit 15 does not have a road system and does not have easy access. I don't believe there is any biological data to support this proposal.

**Proposal #145**

Sealing moose antlers in Units 7 & 15

I **OPPOSE** this proposal. It is not enforceable since moose antler sealing is not required in the rest of the state. The individual can still claim they harvested the moose somewhere else in the state. Moose antler sealing should not be required anywhere in Alaska.

**Proposal #157**

Season end dates in unit 7 & 15.

I **SUPPORT** this proposal. I would like to amend this proposal to include all GMU in the state that end Feb. 28 be changed to the last day of Feb.

**Proposal #'s 170 & 171**

Use of snares/traps for Bear Management in Unit 16

I **SUPPORT** this proposal. I would like snares and traps to be allowed as a lawful method for taking bears in Intensive Management areas. A trapper should be able to sell the hide and skull of bears snared or trapped.

**Proposal #185**

Align Unit 16 with Unit 13 for Wolf and Coyote trapping.

I **SUPPORT** this Proposal. Alignment of seasons in units that share common borders makes sense.

**Proposal #222**

Prohibit shooting within 50 feet of roads in Units 7, 13, 14, 15, and 16A

I **OPPOSE** this proposal. This individual seems concerned about hunting game birds along the road system, but their proposal would limit all hunting within 50 feet of the road. The current regulations are very easy to follow and I don't think hunters should be required to somehow measure "50 feet" from the road before they can shoot. I don't think the current rules are unethical or unsporting and I don't want one person's ethics placed on everyone.

**Proposal #244**

Prohibit the use of .223 caliber full metal jacket bullets

I **OPPOSE** this proposal. There is no justification for this type of restriction and it will be hard to enforce. How do you prove someone is hunting versus plinking with full metal jacket (FMJ) ammunition? Why should someone be required to carry 2 types of ammunition with them? FMJ bullets should be allowed for all types of hunting. The hunter should be able to choose the type of ammunition they want to use. I don't see how this proposal will stop "big game boat hunters interested in harvesting deer on the beaches" with .223 caliber FMJ ammunition.

# STATE OF ALASKA

## CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS

SARAH PALIN, Governor

3700 AIRPORT WAY  
FAIRBANKS, ALASKA 99709

PHONE: (907) 374-3737  
FAX: (907) 451-2751

February 13, 2009

RECEIVED

FEB 13 2009

BOARDS

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

ATTN: BOG COMMENTS

To the Board of Game:

The Citizens' Advisory Commission on Federal Areas submits the following comments on Proposal Numbers 44, 51, 64, 67, 77, 78, 112, 174 and 186. Because these proposals potentially affect seasons and bag limits for brown bear and wolf for portions of game management units within several national preserve units, they are of concern to this commission.

**Proposals 44 – Brown Bear, Unit 9C.** This proposal makes the argument that the current management of brown bear in unit 9C is not sustainable and is inconsistent with the provisions of the Alaska National Interest Lands Conservation Act (ANILCA), the National Park Service Organic Act, and NPS Management Policies at 4.4.2. Specifically, it argues that the ANILCA mandate that Katmai National Park and Preserve be managed to provide for “high concentrations of brown/grizzly bears and their denning areas” is threatened by current harvest levels.

However, the population and harvest data for Unit 9C brown bear compiled by the Alaska Department of Fish and Game do not support this argument. According to ADF&G information, the sustainable annual harvest rate of a given bear populations is around 6%. The long term harvest rate in all of GMU 9C (70% of which is closed to hunting) is 2% and the harvest rate for the remaining 30% of Unit 9C is still below 6%. The harvest level of 33 bears for the open portion of Unit 9C is well within the harvest guideline of 34-45 bears.

The proposal incorrectly implies that the State of Alaska does not regularly consult with the National Park Service. In fact, there is a longstanding Master Memorandum of Understanding between the ADF&G and the National Park Service. Both agencies cooperatively monitor brown bear populations in this area by conducting regular censuses, population surveys and

collecting harvest data. In 2004 and 2005 joint Spring surveys gave an estimate of 2,255 ±306 bears in Unit 9C. August surveys in 2006 and 2007 for the preserve portion of Unit 9C indicated a density of 331-581 bears/386 sq. miles. Clearly, this average density of about one bear per square mile meets the ANILCA mandate for “high concentrations” of brown bears.

Sections 1313 and 1314 of ANILCA recognize the State of Alaska’s authority to manage resident fish and wildlife, as well as the authorities of the Secretary of the Interior. Regulations at 43 CFR Part 24 and Section 8.2.2.6 of the NPS Management Policies further clarify the respective authorities and responsibilities and encourage cooperative agreements or memoranda of understanding between the State and Federal Agencies.

Given the health of the brown bear population in this unit, continuing high densities and the level of cooperation between the ADF&G and the NPS, the allegation in the proposal that the current brown bear management structure in Unit 9C is a “violation of federal law” is unfounded. This proposal should be rejected by the Board of Game.

**Proposal 51 – Brown Bear, Unit 17B.** This proposal should be rejected for many of the same reasons as Proposal 42. It attempts to make the case that current harvest levels of brown bear in that portion of Unit 17B within Lake Clark National Preserve are inconsistent with the purposes for which the preserve was established and that state regulations are in conflict with NPS statutes and management policies. Our review of the available information indicates that this claim is not accurate.

Information from the ADF&G 2004 – 2006 Brown Bear Management Report is cited selectively in an effort to support the proposal. For example, the proposal states that 85 brown bear were harvested in Unit 17 in 2004 – 2005 and 119 were harvested in 2005 – 2006. What the proposal fails to state, however, is that within Unit 17B (the unit in question), 48 bears were harvested in 2004 -2005 and 72 were harvested in 2005 – 2006. It also fails to note that national preserve lands are only a small part of Unit 17B.

The Brown Bear Management Report states that brown bear habitat in Unit 17 is virtually unaltered and in excellent condition. Salmon stocks are carefully managed and escapements are adequate for the needs of the current bear population. The report, while acknowledging that no objective data on the status of the bear population in Unit 17 is available, goes on to state that the population is probably stable to increasing unit wide. It also points out that hunting pressure is greatest along the Nushagak River, in the Mulchatna River drainage, and in the mountains surrounding the Wood River/Tikchik Lakes. Only the upper reaches of the Mulchatna and some of its tributaries are within Lake Clark Preserve. The report concludes that despite an increase in the harvest of brown bears in Unit 17, ADF&G is meeting its objective of maintaining a population that will sustain a harvest of 50 bears per year.

We have already outlined the various legal and regulatory authorities of both the State of Alaska and the National Park Service. The proposal fails to establish that the current management of brown bear in Unit 17B conflict with any of those authorities or with the maintenance of healthy populations of bear within that small portion of the unit that lies within Lake Clark National Preserve. The proposal should be rejected.

The Commission appreciates the opportunity to submit these comments to the Board of Game. If we can provide additional information or if we need to clarify anything, please contact our Executive Director Stan Leaphart at (907) 374-3737.

Sincerely,



*fr* Rick Schikora  
Chairman

**Proposal 64 – Wolf, Units 9B,C, & E.** The Commission recommends this proposal be rejected. The 2006 ADF&G Wolf Management Report indicates a conservative population estimate of some 350 wolves in Units 9 and 10. The report also states that wolf numbers appear to be increasing in these units. The report concludes that harvest has had little effect on the wolf population in Units 9 and 10. Consequently, it appears that current management of wolves in Units 9B, C & E, including seasons and bag limits, is consistent with the ANILCA mandate to maintain healthy populations within those portions of Lake Clark National Preserve, Katmai National Preserve and Aniakchak National Preserve.

**Proposal 67 – Wolf, Unit 17B.** The commission recommends this proposal be rejected. No evidence is presented that the current harvest and management objective is having an adverse impact on the existing healthy population of wolves in that small portion of Unit 17B within Lake Clark National Preserve. As the proposal points out, the management objective of an annual harvest of 25 wolves can easily be met with the estimated 280-320 wolves in Unit 17B.

**Proposal 77 – Brown Bear, Unit 13C. and Proposal 112 – Wolf, Unit 13C.** The commission recommends this proposal be rejected. This proposal again unconvincingly attempts to make a case that current management objectives for brown bear and wolves in Unit 13 are inconsistent with purposes and management for Wrangell –St. Elias National Preserve. The ADF&G Brown Bear Management Report and the Wolf Management Report clearly indicate that brown bear and wolf populations in this unit are healthy and are not adversely affected by current management objectives. These management objectives are within the scope of the State's regulatory authority and remain consistent with the purposes of the preserve.

**Proposal 78 – Brown Bear, Unit 11Z.** The commission strongly recommends rejection of this proposal. The stated objective is to maintain brown bear harvest in this unit at pre-ANILCA levels. There is absolutely no legal or regulatory foundation for this objective. Nothing in ANILCA or its legislative history requires capping the harvest level of any fish or game species at pre-ANILCA levels. The State's authority to regulate fish and wildlife on federal lands means that adjustments to seasons and harvest levels can be made so long as healthy population are maintained. To make the claim that an increase in harvest levels beyond those that existed prior to designation of the preserve would bring state regulations into conflict with federal statutes and management policies is disingenuous and without any legal basis.

By all indications the bear population in this unit is stable and healthy, with the average harvest over the last 8 years below that which occurred prior to creation of the preserve. This proposal must be rejected.

**Proposal 174 – Brown Bear and Proposal 186 – Wolf, Unit 16B.** The Commission recommends rejection of these two proposals for the same reasons given for Proposals 77 and 112. Populations of brown bear and wolves in this unit remain healthy. State management is within the scope of its authorities and is consistent with the purposes of Denali National Preserve as well as federal regulations and management policies.

HATCHER PASS 89 AMMENDMENT PLAN REBUTTLE  
 Opposing Proposal 193 of February / March 2009 Al Plisousky

UNIT 14A; SUB UNIT B

- I. Hunters assume area is open - south side of government peak
- A. p. 24 - Government Peak specifically states: "other motorized trail development is not allowed due to incompatibility with the tranquil resort setting." (Nobody is asking for more or other trail developments; we just want to keep what we already have.)
  - B. p. 47 - Hillside - states: "The intent is to continue opportunities for moose & black bear hunting and the use of motorized vehicles for that purpose on existing public roads and trails until alternate access routes and trailheads are developed." (There is no official development yet)
  - C. p.53 - Hillside -- 6. a. states: "Density of trails will be low to prevent moose harassment... ADF&G will be consulted prior to authorization of the trail system."
  - D. 6. e states: "Hunting access. Traditional motorized access for hunting will continue unless an area is closed for a non-motorized trail system. In that event, equal or better access will be provided.
  - E. p. 6 Gov't Peak - C' MANAGEMENT INTENT middle of 1<sup>st</sup> paragraph states: "A variety of motorized and non-motorized trails will be established in most of the unit.
  - F. p.13 Gov't Peak - c. Grazing in Subunit B. middle of paragraph states: "If, at some point in the future, it should be determined that establishment of a resort is unlikely,... (1) 89 amendment is a PLAN The environmental survey is not completed yet. (2) Proposal 193 is PREMATURE & bearing false testimony.
- II. Vegetation - Habitat: where plant or animal naturally occur
- A. p.3 Gov't Peak A. LAND USE DESIGNATIONS / Primary Use states: "(If a...four-season resort is established, fish & wildlife habitat then becomes a secondary use.)"
  - B. Attitude: In this multi-use area of subunit B, Unit 14A, trees have been cut down to build bridges that horses can't use, & at least 2 blueberry patches have been destroyed with 12' swaths running through them. Nothing has been officially established yet & no hands have been slapped to discipline these actions.
- III. Salmon fry: last summer fisheries were doing a survey & I called & asked the following: "were there any fry in the streams that u checked - answer, yes. Were there any ATV trails or scarrings of vegetation noticeable - answer, no." We can assume then that either they have not 'finished' their survey & or the fry do not go at the height up where the ATV trails are located.
- IV. OTHER SOLUTIONS CONSIDERED?
- A. P.4 Gov't Peak - paragraph #8: "Recreational use is light due to limited access. (There are about 3 trails of multi-use access & the only one that has any significant sign of use, misuse or abuse is where there is now a 12' swath that is currently maintained for skiing. The other trails are used for spring bear baiting in the spring (maybe 2 stands) & generally have mostly grown over & sometimes hard to find in the fall when used to carry out game.)
  - B. It's obvious to me that a person of retirement age with a bad back writing a proposal like this doesn't plan on staying around; after he has done his damage as a special interest group, coming in & shoving everybody else out. This is a multi-use area now going under several observations & nobody should be doing anything to make it difficult for anyone else. Let the proposer stay in his own realm & let Fish & Game take care of Fish & Game.

HATCHER PASS 89 AMMENDMENT PLAN REBUTTLE - page 2  
( Mgmt Agreement btw. Div of Land & Water Mgmt and Div of Parks & Otdr Rec)

C. p. 1 (Purpose), middle of paragraph: "The increase in public use of the area and conflict between users has resulted in public safety and health concerns, and off-road vehicle use on the Hatcher Pass Road. There is a need for adequate trails, law enforcement, greater public .....

D. Addendum "A". Nov. 21, 86, p.5, C. SUMMER OFF RD. VEH. USE: "off-road motor vehicle use will occur on designated trails only.

E. DESIGNATION OF TRAILS, p.5, #1. (Special Purpose Trails May Be Designate): "Div of Land & ...may designate special purpose trails to provide new recreational opportunities or to resolve conflicts between uses. Where possible, consultation with affected user groups will be conducted prior to designation of such trails and will be encouraged to construct and maintain such special purpose trails." p. 6, #2."If necessary, an annual public meeting will be held with representatives of a variety of user groups to evaluate activities occurring, public safety and to recommend any needed modifications to the motorized, non-motorized and special-purpose trails."

V. MGMT. AGREEMENT BETWEEN THE DEPT. OF NATUL. RES. AND THE MAT-SU BOR.

A. p.1 (PURPOSE): "This Agreement sets forth the procedures and responsibilities of the parties in cooperatively implementing management and enforcement activities within the IPMU."

B. p.1 (ENFORCEMENT): "It is the intent of this Agreement that Parks will be the lead agency in the enforcement of the land covered by this agreement for public safety, natural resource protection and recreation."

1/2 to fair fee for use (cost Parks of \$150,000)  
should be paid to all.

# CARING FOR KNEES

JOHN D. FROST, MD



• KNEE INJURIES  
• ARTHROSCOPIC SURGERY

4100 LAKE OTIS PARKWAY, SUITE 302  
ANCHORAGE, ALASKA 99508

MARK A. MALZAHN, P.A.-C  
CERTIFIED PHYSICIAN ASSISTANT

A PROFESSIONAL CORPORATION  
(907) 563-7072 • FAX (907) 562-5742

## Board of Game comments

February 13, 2009

Alaska Department of Fish and Game  
Board Support Section  
Fax 907-465-6094

Dear Board Members,

I have reviewed the proposal booklet for your upcoming meetings here in Anchorage. Attached are my (very brief) comments regarding some of the proposals which I am personally interested. There are numerous other proposals but many will be addressed by the Alaskan Bowhunters Association.

- 42 – oppose
- 43 – oppose
- 44 – oppose
- 160 – partially favor
- 161 – support
- 163 – support
- 190 – partially oppose
- 201 – oppose
- 210 – support
- 211 – support
- 240 – support
- 241 – support

Please see page two of this letter for a (slightly) expanded discussion of my position. I hope to be able to explain my positions more fully at the public testimony of your hearings.

Thank you,

  
John D. Frost

JOHN FROST Board of Game Comments  
 PAGE TWO  
 2/13/09

Prop#	sponsor	abstract	comments	support
42	Ken&Chris Day	delay brown bear till Oct 15 unit 9C	too late bear will be hibernating	no
43	Jules&Peg Tilleston	Close brown bear hunt funnel&moraine creeks	Park Preserve specifically so hunting could exist	no
44	Jim Stratton NPCA	drawing permits only	Park Preserve specifically so hunting could exist	no
160	Rolan Ruoss	change bag and no SDA for Kodiak Caribou	reduced bags OK but leave SDA	partially
161	Jake Jacobsen	require deer harvest reports	absolutely	yes
163	Kodiak AC	request Goat registration hunt and availability	agree	yes
190	ADF&G	requesting special methods for govt employees	only if all possible public control methods fail	maybe
201	APHA	wounded brown bear to count	bad to legislate ethics //add mortality	no
210	John Frost	Archery trophy sheep drawing hunt August 1-9	Increase value of Gov permit	yes
211	John Frost	Archery late sheep hunt October 1-10	Increase opportunity / minimal impact	yes
240	Board of Game	Increase to six number of draws for any species	yes	yes
241	Board of Game	Bonus point system	suggest squaring bonus points	yes

**Alaska Professional Hunters Association Inc.**  
HC 60 Box 299C Copper Center, Alaska 99573  
(907) 822-3755

February 14, 2008

Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811-5526

**SPRING 2009 BOARD OF GAME WRITTEN COMMENTS**

Dear Alaska Board of Game Members,

**Please find the following comments for your consideration regarding proposals you will be addressing at your Spring 2009 meeting in Anchorage. The Alaska Professional Hunters Association Inc. (APHA) has serious concerns with the scope of many of the proposals you will be addressing at this meeting. The professional guide industry represents a significant and important rural economy in Alaska which is dependant upon prudent stewardship and conservation of Alaska's wildlife. Most importantly, wildlife conservation measures that support harvestable surpluses of wildlife also contribute the most enhanced lifespan and care for all species and all persons who enjoy and depend on Alaska's wildlife.**

**As a State, Alaska has begun the long recovery of rebuilding and re-establishing our stewardship mandates regarding our precious wildlife populations. This momentum has been achieved primarily because of a number of like-minded conservation organizations involved with public policy making helping to establish the tools to help you respond to biological concerns. APHA has been a significant part of this effort. Please know that your programs are working and are generating the much needed relief and better stewardship for Alaska's wildlife.**

**APHA has also been at the forefront of professional guide industry advocacy working to reduce negative social and wildlife/wildland conservation impacts generated by the guiding industry. During the past four years we have achieved substantial goals to this affect with the establishment (Dec. 2005) of the Big Game Commercial Services Board (BGCSB) and Development of the proposed Department of Natural Resources/ADF&G/BGCSB Guide Concession Program. This program scheduled to be implemented during January of 2011 will substantially reduce the number of guides operating on State lands.**

**APHA feels that it is very important that you consider the whole of the achievements that have been made and what the benefits have been to our wildlife in these regions as well as**

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APHA Spring 2009 BOG Comments

Page 1

*Dedicated to the Conservation of Alaska's Wildlife Resources*

RECEIVED TIME FEB. 13. 4:35PM

Public Comment #

**57**



what we can do to assist with these type of efforts in other needed regions. It is important to note that there have been numerous dynamics that have been implemented on this road to recovery so to speak regarding our wildlife conservation enhancement and Intensive/Predator Management programs.

What we do know is that these dynamics are working and have stood the test of legal challenge and public acceptance. APHA therefore urges caution to you regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs.

As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going to far to fast in initiating methodologies that may jeopardize the whole of the existing programs.

APHA asks for your support in developing expansion of management programs intended to grant relief to predator and prey imbalances. We urge your support for these initiatives where and when possible in keeping with maintaining the whole of the programs statewide. The predator management programs provide for optimum sustained yield management which provides for the best interest of the wildlife, and all people who depend on and enjoy prudent management.

Many of the proposals you will be considering at this meeting seek to eliminate or restrict existing non-resident hunter opportunity in some manner. Once again, there are numerous reasons for APHA to urge caution and restraint in regards to support of these proposals related to balance for the whole considerations.

Please consider the following factors when addressing these proposals:

1. Annual Non-Resident Harvest percentage of moose, caribou and sheep is low in comparison with the wildlife conservation funding they provide. When you eliminate non-resident opportunity, you eliminate the vital funding needed to enhance and conserve wildlife for the best interest of the whole.
2. Several of these proposals express concern over perceived crowding of guided hunting activity on public lands. Please understand that eliminating non-resident hunting activity will not eliminate transporter or other hunting parties all vying for declining wildlife populations. By eliminating non-resident hunters, or by giving special season dates for resident only hunters we further fragment the hunter/conservationist fraternities. The perceived conflicts will not disappear from the field, rather they will continue to be replaced and possibly escalated within different user groups.

3. Few if any of these proposals are generated from concerns related to Federal lands where guide industry *concessions* are incorporated which limit the number of guides per geographical region. Currently, the proposed DNR/ADF&G/BGCSB Guide Concession program development is in its third year of development. Proposed implementation date for the program is January 2011. Tremendous work by numerous State agencies including the Board of Game has been put into development of this program which is designed to restrict guided hunting activity on State lands. Selection criteria for this competitive program includes substantial credit given for the applicants proposed consideration for resident hunters and other user groups encountered within their plan of operations.
4. When non-resident hunting is eliminated, a substantial part of the annual predator harvest which occurs during the ungulate hunts is also eliminated. When you eliminate this non-resident harvest, you eliminate in most cases, the most significant annual predator harvest as well.
5. Moose harvest restrictions of 50 inch or brow tine requirement for moose hunters is biologically designed to not affect the reproduction of the moose population. Thus, the limited amount of current non-resident harvest is not affecting the overall moose population.
6. Historical predator (wolf) management was utilized to enhance ungulate populations. These historic and current efforts were and are conducted in many cases by professional guide service providers. The resulting gain in ungulate populations has now been calculated into the Amount Necessary for Subsistence numbers which is utilized to eliminate the guide service providers who have and are working so hard to assist in ungulate enhancement. In short: Many ANS numbers have been generated during the highest density of these ungulate species in history and represent numbers that we may never see again, and as such, are unjust and result in a tool utilized to eliminate other user groups.

**PROPOSALS THAT APHA OPPOSES:** 14, 15, 16, 19, 34, 42, 43, 44, 45, 46, 47, 49, 50, 51, 52, 57, 59, 60, 61, 64, 67, 74, 75, 77, 78, 106, 107, 108, 109, 112, 113, 158, 162, 166, 170, 171, 174, 182, 184, 186, 189, 199, 203, 206, 210, 211, 212, 213, 214, 217, 218, 221, 224, 237,

**PROPOSALS THAT APHA SUPPORTS:** 4, 13, 29, 30, 31, 32, 33, 35, 38, 48, 53, 54, 56, 58, 65, 66, 68, 69, 76, 79, 80, 97, 101, 102, 103, 104, 105, 111, 114, 142, 143, 153, 154, 155, 160, 161, 163, 169, 173, 190, 198, 200, 201, 207, 208, 215, 219, 220, 236, 241, 244, 245, 246

**PROPOSALS THAT APHA SUPPORTS WITH AMMENDMENT:** 17, 55, 62, 129, 130, 132, 135, 136, 137, 138, 139, 140, 159

**PROPOSALS THAT APHA HAS COMMENTS ON BUT DEFERS TO THE  
CONSIDERATION OF THE BOARD: 125, 127, 128, 168, 192, 216, 230, 238, 239, 240,**

**PROPOSAL COMMENTS**

**Proposal 4: Support.** Based on its given merits.

**Proposal 13: Support.** Based on its given merits. This proposal addresses a geographical region that was established prior to the BOG policy regarding implementation of drawing permit hunts and non-resident hunters. This proposal represents a needed oversight.

**Proposals 14, 15, 16, 19, Oppose.** (Please see item numbers 1-4 above.) The BOG policy regarding drawing permits allows the board to address this concern. For consideration, APHA recommends that the board may separate non-resident guided activity from second degree of kinship. APHA feels strongly that second degree of kinship permits should be awarded from the resident pool.

**Proposal 17: Support with Amendment.** APHA recommends comparing this proposal with BOG drawing permit policy regarding non-resident hunter percentages and adopting it accordingly.

**Proposal 29: Support.** Based on its given merits.

**Proposal 30: Support.** Based on its given merits. APHA members that operate in this region have experienced substantial increase in hunting pressure and decline in overall bear numbers.

**Proposal 31: Support.** Based on its given merits.

**Proposal 32, 33: Support.** Based on its given merits.

**Proposal 34: Opposes.** Prefer status quo for biological concerns.

**Proposal 35: Support.** Based on its given merits.

**Proposal 38: Support.** Based on its given merits.

**Proposal 42: Oppose.** There are ample opportunities for viewers from May 25<sup>th</sup> all through the summer months when fish runs are at their peak. Additionally Katmai National Park presents substantial and world class viewing opportunities where no hunting is allowed.

**Proposal 43: Oppose.** There is no biological justification. There are ample opportunities during times when hunting seasons are closed for viewing.

**Proposal 44: Oppose.** There is no biological justification to restrict or limit non-resident harvest

**Proposal 45: Oppose.** This proposal suggests that the brown bear populations in the Preserve are being over hunted, this is simply not true. The current level of harvest is sustainable.

**Proposal 46: Oppose.** Since the elimination of same day airborne hunting in 1972, brown bear population on the Alaska Peninsula has been managed conservatively. Shortened seasons and alternating seasons have resulted in healthy bear populations with an abundance of older age class bears available for residents and non-residents. We have avoided a permit drawing scenario in GMU 9 because of the current regulatory scheme. Brown bears are a low reproductive species. Whole bear population may be currently at high levels it could take only one or two cycles to reduce key components of the bear population to a level where much more restrictive regulations would be required to provide for sustained yield and quality of hunting experience.

**Proposal 47: Oppose.** There is ample opportunity to harvest bears under current seasons and bag limits for any general resident whether domiciled in GMU 9 or elsewhere. There is absolutely no evidence to support the contention that there is an "over population" of brown bears in GMU 9E.

**Proposal 48: Support.** Based on its given merits.

**Proposal 49: Oppose.** ADF&G biological survey data will indicate that moose populations are not depleted. When we had active wolf control programs, the numbers of bear predation did not prove to be a significant factor. Bears are a very low reproductive species as opposed to wolves which are a high reproductive species.

**Proposal 50: Oppose.** Wolves may be amore significant factor in predation on moose and caribou than brown bears. Brown bears must be managed carefully as they are a low reproductive species. Their value to all user groups are more important than relegating them to vermin status.

**Proposal 51: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandate. Nothing in current state regulation contravenes or violates the congressional intent provided in ANILCA (36 CFR 13.40(d) Bear populations are healthy and viable, harvest levels are sustainable. If there were a problem with current regulations allowing for over harvest there would not be the abundance of bears inside and outside Katmai National Park as currently exists. The preserves were specifically created by Congress to allow for hunting opportunities, not to exclude them.

**Proposal 52: Oppose.** The maker of the proposal suggests that there is an over abundance of brown bears in GMU 17, there is no evidence statistically that this is the case, additionally he suggests that moose population in the area "will eventually drop due to bear predation" there is also no evidence to indicate that moose populations have or will drop due to brown bear predation.

**Proposal 53: Support.** Based on its given merits.

**Proposal 54: Support.** Based on its given merits.

**Proposal 55: Support with Amendment.** Proposed amendment to include provision for non-resident allocation.

**Proposal 56: Support.** Based on its given merits.

**Proposal 57: Oppose.** (Please see comments 1, 2, 3, 4, & 6 above)

**Proposal 58: Support.** Based on its given merit.

**Proposal 59: Oppose.** There is no biological support or reason for this proposal. This proposal furthers the divide between hunter/conservationists.

**Proposal 60: Oppose.** We have biological concerns over the proposal as drafted. There appears to be ample opportunity during existing seasons to harvest moose.

**Proposal 61: Oppose.** The non-resident restrictions placed on this region were generated because of overcrowding of guides and biological concerns. APHA recommends holding back on any changes to *status quo* until implementation of the proposed DNR Guide Concession Program.

**Proposal 62: Support with Amendment.** Registration harvest levels MUST be monitored carefully and in a timely manner. For any future ANS determinations, unreported harvest should not be considered. The opportunity to harvest moose to meet local needs is a privilege too great to ignore licensing and reporting requirements.

**Proposal 64: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandates.

**Proposals 65, 68, 69: Support.** APHA asks for your support in developing expansion of management programs intended to grant relief to predator and prey imbalances. We urge your support for these initiatives where and when possible in keeping with maintaining the whole of the programs statewide. The predator management programs provide for optimum sustained yield management which provides for the best interest of the wildlife, and all people who depend on and enjoy prudent management. APHA does not believe that State law requires for complete elimination of non-resident hunter opportunity prior to implementation of predator management programs. We encourage your consideration in this regard whenever working to implement needed predator-prey management.

**Proposal 66: Support.** Based on its given merits.

**Proposal 67: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandates.

**Proposals 74, 75: Oppose.** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs.

**Proposal 76: Support.** Based on its given merit.

**Proposal 77, 78: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandates.

**Proposal 79: Support.** Based on its given merit.

**Proposal 80: Support.** Based on its given merit.

**Proposals 97, 101, 102, 103: Support.** Based on their given merit

**Proposals 104, 105: Support.** Based on their given merits.

**Proposal 106, 107: Oppose.** APHA does not like to define different classes of hunters or different season dates accordingly.

**Proposal 108, 109: Oppose.** APHA recommends holding back on any changes to status quo until implementation of the proposed DNR Guide Concession Program. If any changes are considered, they should be made according to the BOG non-resident drawing permit policy.

**Proposal 111: Support.** Based on its given merits.

**Proposal 112: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandates.

**Proposal 113: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandates.

**Proposal 114: Support.** Based on its given merits.

**Proposals 125, 127, 128: Defers To The Consideration Of The Board** APHA has concerns over illegal importation of black bear hides from GMU 6 and for lengthening of season dates into periods of high tourism. APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs.

**Proposals 129, 130, 132, 135, 136, 137, 138, 139, 140: Support with Amendment.** Based on their given merits to include non-resident allocation provision.

**Proposal 142: Support.** Based on its given merits.

**Proposal 143: Support.** Based on its given merits and to incorporate the BOG DRAWING PERMIT POLICY for non-residents.

**Proposals 153, 154: Support.** Based on their given merits. APHA asks for your support in developing expansion of management programs intended to grant relief to predator and prey imbalances. We urge your support for these initiatives where and when possible in keeping with maintaining the whole of the programs statewide. The predator management programs provide for optimum sustained yield management which provides for the best interest of the wildlife, and all people who depend on and enjoy prudent management. APHA does not believe that State law requires for complete elimination of non-resident hunter opportunity prior to implementation of predator management programs. We encourage your consideration in this regard whenever working to implement needed predator-prey management.

**Proposal 155: Support.** Based on its given merits and to incorporate the BOG DRAWING PERMIT POLICY for non-residents.

**Proposal 158: Oppose.** The Kodiak Island sealing condition was initiated years ago to keep bears from Kodiak Island on the Island instead of showing up in Bristol Bay or Anchorage for sealing. While this has proved to be cumbersome at times, the system has worked well and APHA would not like to see it changed, as we believe a change could impact bear populations on Kodiak Island in a negative way.

**Proposal 159: Support with amendment.** Delete same day airborne portion of the proposal.

**Proposal 160: Support.** Based on its given merits.

**Proposal 161: Support.** Based on its given merits.

**Proposal 162: Oppose.** APHA does not like to define different classes of hunters or different season dates accordingly.

**Proposal 163: Support.** Based on its given merits.

**Proposal 166: Oppose.** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs.

**Proposal 168: Defers To The Consideration Of The Board** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs.

**Proposal 169: Support.** Based on its given merit.

**Proposals 170, 171: Oppose.** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs. As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going too far too fast in initiating methodologies that may jeopardize the whole of the existing programs.

**Proposal 173: Support.** Based on its given merits.

**Proposal 174: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandates.

**Proposal 182: Oppose.** APHA does not like to define different classes of hunters, different season dates or means and methods of harvest, accordingly.

**Proposal 184: Oppose.** Please refer to BOG policy regarding non-resident drawing permits.

**Proposal 186: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandate.

**Proposal 189: Oppose.** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs. As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going too far too fast in initiating methodologies that may jeopardize the whole of the existing programs.

**Proposal 190: Support.** Based on its given merits.

**Proposal 192: Defers To The Consideration Of The Board.** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs. As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going too far too fast in initiating methodologies that may jeopardize the whole of the existing programs.

**Proposal 198: Support.** Based on its given merit.

**Proposal 199: Oppose.** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs, especially when season dates encroach into high tourism time periods.

**Proposal 200: Support.** Based on its given merit.

**Proposal 201: Support.** Based on its given merit.

**Proposal 203: Oppose.** Please refer to comments 1, 2, 3, and 4 on pages 2 and 3 above. If any separate allocation is considered the BOG Policy regarding development of drawing permits should be considered.

**Proposal 206: Oppose.** APHA opposes providing different season dates, or means and methods of harvest for specialty weapon hunts. Prefer status quo, which is fair to all hunters.

**Proposal 207: Support.** Based on its given merits.

**Proposal 208: Support.** Based on its given merits.

**Proposals 210, 211: Oppose.** APHA opposes providing different season dates, or means and methods of harvest for specialty weapon hunts. Prefer status quo, which is fair to all hunters.

**Proposals 212, 213, 214: Oppose.** APHA has been at the forefront of professional guide industry advocacy working to reduce negative social and wildlife/wildland conservation impacts generated by the guiding industry. During the past four years we have achieved substantial goals to this effect with the establishment (Dec. 2005) of the Big Game Commercial Services Board (BGCSB) and Development of the proposed Department of Natural Resources/ADF&G/BGCSB Guide Concession Program. This program scheduled to be implemented during January of 2011 will substantially reduce the number of guides operating on State lands. Tremendous work by numerous State agencies including the Board of Game has been put into development of this program, which is designed to restrict guided hunting activity on State lands. Selection criteria for this competitive program includes substantial credit given for the applicants proposed consideration for resident hunters and other user groups encountered within their plan of operations.

Please understand that eliminating non-resident hunting activity will not eliminate transporter or other hunting parties all vying for declining wildlife populations. By eliminating non-resident hunters, or by giving special season dates for resident only hunters we further fragment the hunter/conservationist fraternities. The perceived conflicts will not disappear from the field, rather they will continue to be replaced and possibly escalated within different user groups.

Annual Non-Resident Harvest percentage of moose, caribou and sheep is low in comparison with the wildlife conservation funding they provide. When you eliminate non-resident opportunity, you eliminate the vital funding needed to enhance and conserve wildlife for the best interest of the whole.

When non-resident hunting is eliminated, a substantial part of the annual predator harvest which occurs during the ungulate hunts is also eliminated. When you eliminate this non-resident harvest, you eliminate in most cases, the most significant annual predator harvest as well.

**Proposal 215: Support.** Based on its given merits.

**Proposal 216: Defer To The Consideration Of The Board.** APHA requests that the BOG encourage the Department to create a working group of all users to work on complex wild sheep related issues.

**Proposal 217: Oppose.** APHA strongly supports the many merits of the existing sealing requirement.

**Proposal 218: Oppose.** APHA has been at the forefront of professional guide industry advocacy working to reduce negative social and wildlife/wildland conservation impacts generated by the guiding industry. During the past four years we have achieved substantial goals to this effect with the establishment (Dec. 2005) of the Big Game Commercial Services Board (BGCSB) and Development of the proposed Department of Natural Resources/ADF&G/BGCSB Guide Concession Program. This program scheduled to be implemented during January of 2011 will substantially reduce the number of guides operating on State lands. Tremendous work by numerous State agencies including the Board of Game has been put into development of this program which is designed to restrict guided hunting activity on State lands. Selection criteria for this competitive program includes substantial credit given for the applicants proposed consideration for resident hunters and other user groups encountered within their plan of operations.

Please understand that eliminating non-resident hunting activity will not eliminate transporter or other hunting parties all vying for declining wildlife populations. By eliminating non-resident hunters, or by giving special season dates for resident only hunters we further fragment the hunter/conservationist fraternities. The perceived conflicts will not disappear from the field, rather they will continue to be replaced and possibly escalated within different user groups.

Annual Non-Resident Harvest percentage of moose, caribou and sheep is low in comparison with the wildlife conservation funding they provide. When you eliminate non-resident opportunity, you eliminate the vital funding needed to enhance and conserve wildlife for the best interest of the whole.

When non-resident hunting is eliminated, a substantial part of the annual predator harvest which occurs during the ungulate hunts is also eliminated. When you eliminate this non-resident harvest, you eliminate in most cases, the most significant annual predator harvest as well.

**Proposal 219: Support.** Based on its given merits.

**Proposal 220: Support.** Based on its given merits. APHA encourages the board to adopt this proposal which will directly address substantial ongoing illegal guiding activity by transporters.

**Proposal 221: Oppose.** Prefer status quo.

**Proposal 224: Oppose.** APHA supports the concept of this proposal regarding white color phase of black bears but the proposal is not definitive enough to protect white phased bears versus other light colored phases of black bears.

**Proposal 230: Defer To The Consideration Of The Board.** Historical predator (wolf) management was utilized to enhance ungulate populations. These historic and current efforts were and are conducted in many cases by professional guide service providers. The resulting gain in

ungulate populations is now calculated into the Amount Necessary for Subsistence numbers which is utilized to eliminate the guide service providers who have and are working so hard to assist in ungulate enhancement. In short: The ANS numbers generated during the highest density of these ungulate species in history and represent numbers that we may never see again, and as such, are unjust and result in a tool utilized to eliminate other user groups.

**Proposal 236: Support.** Based on its given merits.

**Proposal 237: Oppose.** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs. As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going too far too fast in initiating methodologies that may jeopardize the whole of the existing programs. We support the working group establishment portion of this proposal.

**Proposal 238, 239: Defer To The Consideration Of The Board.** Please see page one of these comments.

**Proposal 240: Defer To The Consideration Of The Board.** APHA has studied this concept extensively and found that it has limited merit.

**Proposal 241: Support.** Based on its given merits

**Proposal 244: Support.** Based on its given merits.

**Proposal 245: Support.** Based on its given merit.

**Proposal 246: Support.** Based on its given merit.

Submitted By:



Robert Fithian

Executive Director

Alaska Professional Hunters Association, Inc.

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

RECEIVED

Feb. 1, 2009

FEB 04 2009

BOARDS

Dear Madams and Sirs;

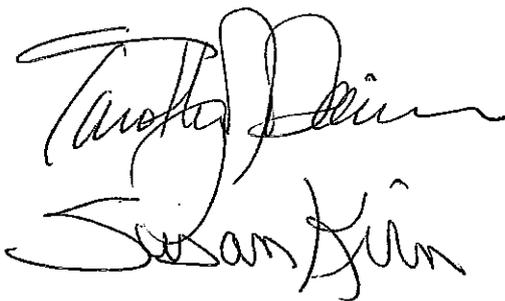
I am writing this letter to urge the Board of Game to permanently close hunting of Sandhill Cranes in the Homer Area (Unit 15c). Our local, very small population of these long-lived migratory birds are threatened by several natural and human-caused factors. Senseless hunting and killing further endangers their survival and diminishes their numbers.

Their extremely low productivity rates should, in itself, be cause for alarm. That, coupled with excessive eagle predation and a constantly shrinking habitat, should be reason enough to cease killing these birds. Unbelievably, Alaska alone permits the hunting of cranes.

Why they are allowed to be hunted at all is a mystery. They are all legs, wings, feathers, neck and beak and could hardly be considered a major food source. They consist of about as much edible flesh as a chicken. Any miniscule subsistence benefit one would gain from killing them is outweighed by the potential loss to the local bio-diversity. They are worth more to us, themselves and the planet, alive than dead.

The overreaching threat that the impending global climate catastrophe represents to all wildlife on Earth should be a consideration. All the worlds' wildlife is susceptible. These changes may be irreversible and permanent. It's time to give our Sandhill cranes a break and stop the hunting. Please pass Proposal #118 and close the hunting season on cranes in the Homer area.

Sincerely,  
Tim Davis and Susan Kirn  
40679 Kay Court  
Homer, AK 99603  
907-235-2045

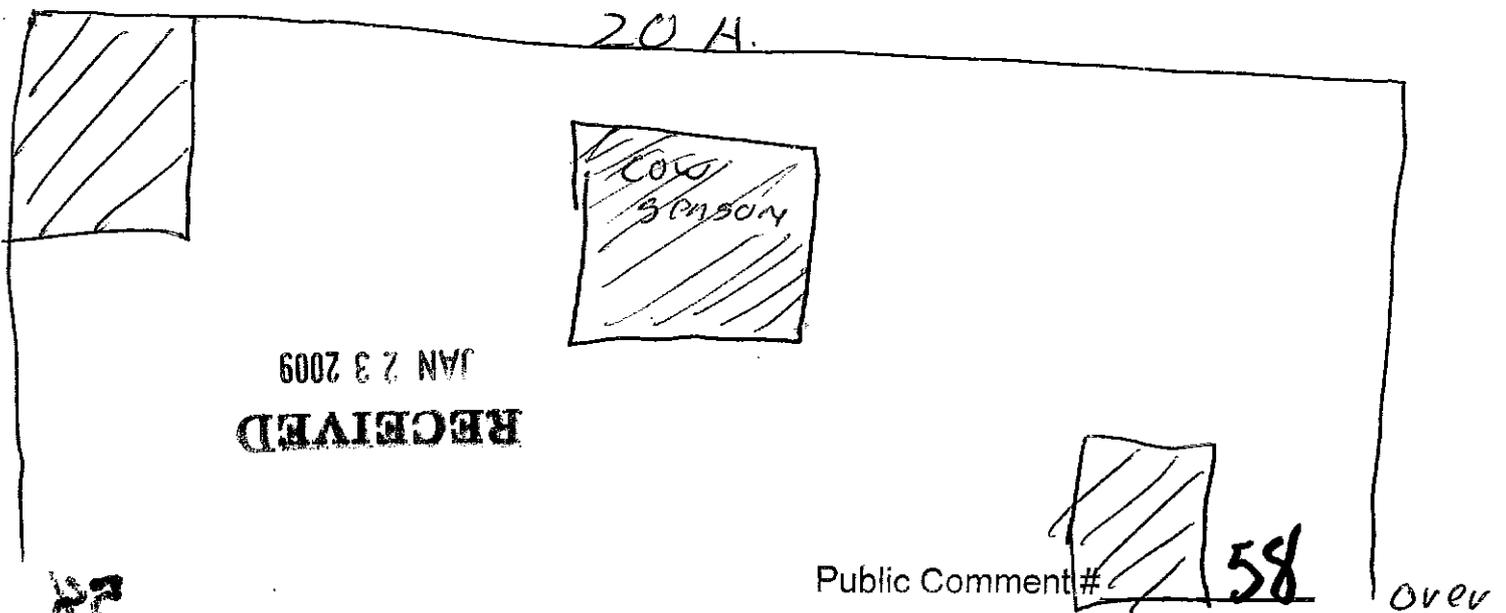
Handwritten signatures of Tim Davis and Susan Kirn. The signature of Tim Davis is on top, and the signature of Susan Kirn is below it.

Dear Rita StLouis

Killing cows in unit 20A is acceptable,

However, 20A encompassed, thousand and thousands of ~~antelope~~ sages, There use to be 18 to 20 moose near my home, Now there is nothing, ~~the~~ the feed is there, Down by Nenana, Moose use to be packed, Now Nothing, listen to the people, Stop ~~the~~ killing cows, in areas where there are only a few left, Look at the Chena River, By killing all the cows, the feed has grow up so high. Its No Longer Food.

My suggestion, Only open up areas where moose are over populated, that means 10 sq Miles at a time,



The Dept of Fish and Game gets an F  
grade. We need High moose population to  
Keep Areas Broused, yes some will get  
Hit by cars, <sup>some will starve</sup> At present this is the  
lowest I ever seen the moose population.  
When you drive from Eielson to Cantwell  
And don't see one moose, and very few  
tracks. It says there is NO moose there.

Note that is early morning " Not during  
the middle of the day!

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JAN 28 2009

BOARDS

suggestion, don't open up cow season  
~~withins~~ within 5 miles of the road  
system, "then open areas no larger than  
10 sq miles, Don't be strict on enforcement,

When I see more moose  
Near Anchorage, and ~~down~~  
Along the coast, I say, Let's  
~~Follow~~ do what there doing  
Hell we recently had 10 million acres burnt, Prime  
Moose Habitat, with very few moose, stop killing cows  
give them time to repopulate, "Fact" when a animal over feeds  
then ~~more~~ Don't kill them

Sincerely

Phil Zagstoc

468-7903

ATTN: BOG COMMENTS  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK. 99811-5526

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JAN 09 2009  
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I am writing to state that I am in support of proposal #'s 22, 23, 34, 42, 43, 44, 45, 46.

I am also writing to state that I am in opposition of proposal #'s 10, 11, 12, 13, 15, 19, 20, 21

Thank you.

Nathan Lovas

RECEIVED TIME JAN. 9. 6:45PM

Public Comment # 58

**Eric Reinbold**  
**17217 Yellowstone Dr**  
**Eagle River, Alaska**

**January, 27, 2009**

**ATTN: BOARD OF GAME COMMENTS**  
**Alaska Department of Fish and Game**  
**Boards Support Section**  
**P.O. Box 115526**  
**Juneau, AK 99811-5526**  
**Fax: 907-465-6094**

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JAN 28 2009

BOARD

**PROPOSAL 2 - 5AAC 85.020(13). Hunting seasons and bag limits for brown bear.**

**Position on Proposal:** As an Eagle River resident, I support the proposal to amend the seasons and add the upper Eagle River drainage to the area allowed for brown bear hunting.

**Explanation:** There has been an unacceptable increase in the number of dangerous bear encounters in the Eagle River area. There are clearly too many bears in the area. Greater hunting pressure will reduce the number of bears and make bears more leery of humans.

**PROPOSAL 5 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Increase available moose tags in the Anchorage Management Area of 14C and increase the hunt area.**

**Position on Proposal:** I support the proposal to increase the bag limits and expand the hunt area as proposed.

**Explanation:** There are too many moose in the Anchorage area. The Anchorage bowl should not be considered moose habitat in determining the carrying capacity of unit 14C. The large moose population leads to unacceptable damage to property, including landscaping trees and damage to automobiles and injury to motorist involved in collisions with moose. The excessive moose population also attract an unacceptable number of brown bears into the municipality creating an increasing danger of negative human-bear encounters and the increasing likelihood of a bear mauling fatality.

**PROPOSALS 7, 8, 9, 10 and 11**

**5 AAC 085.045(12). Hunting seasons and bag limits for moose. Re-authorize the antlerless moose season in Unit 14(C).**

**Position on Proposal:** I support these proposals.

**Explanation:** There are too many moose in the Anchorage area. The large moose population is contributing to the bear problem.

Public Comment #

59

RECEIVED TIME JAN. 28. 7:43AM

TOTAL P.01

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JAN 20 2009  
BOARDS

To Whom it may concern,

I'm an avid hunter and a longtime member of the NRA. I've spent time out on Katmai photographing the brown bears and when I was told they were being hunted and at times shot at almost pointblank range unabated I was outraged. The Katmai bear hunt should be stopped and I support the Spring 2009 Southcentral Proposals 42-45.

*Jerome Russell*  
Jerome Russell  
4705 Redstart St.  
Houston, Texas 77035  
713 423-5103

Paul Keller  
10045 Chickaloon St.  
Eagle River, AK 99577  
[pdkea@aol.com](mailto:pdkea@aol.com)

RECEIVED  
JAN 07 2009  
BOARDS

January 7, 2009

To whom it may concern:

I am a member of the online Alaska Outdoors Forum and a long-time Alaskan resident. I routinely utilize the natural resources of this state as a responsible hunter and outdoor conservationist every year for both recreation and sustenance. As such, I make every effort to stay abreast of changes to state laws that would affect hunting, fishing, and wildlife management in this state.

Recently, I have become aware of Proposal 244 — 5 AAC 92.085 that is attempting to modify the unlawful methods of taking big game to include the complete prohibition of big game hunting in all calibers with full-metal jacket (FMJ) bullets throughout the state of Alaska. The text of the proposal is included with this letter in the official PDF file of the Board of Game proposals for the spring of 2009 for reference. As a law-abiding hunter, I am appalled that my representatives in the state Board of Game have attempted to create an illogical law with no apparent regard for the facts or the science behind terminal ballistics, shot placement, and basic kinetic physics. As such, I am writing this letter to clarify a few facts and to express my deepest displeasure in the actions of the current member or members of the Board of Game responsible for drafting and modifying this proposal. With this having been stated, let me also clarify that I am in no way personally attacking any of the members of the Board of Game or the author of this proposal, Brad Shaffer, with any malice or ill will. I am simply trying to shed light on the truth so that the members of the Board (as well as the public) may have a fuller understanding of the physical facts involved in this issue.

I have read the text of the proposal, and it uses terminology that I would highly recommend eliminating from the proposal. Specifically, the proposal describes full-metal jacket bullets as being "designed for maiming people in time of war", while it describes soft-tipped or solid bullets as being "designed to kill." Unless I am mistaken, is not *any* bullet designed to kill? The design of the bullet has a rather minimal effect on its ability to kill any organism; rather, it is the shot placement of a bullet that gives it its most potency. Even if you shoot a moose with a cannonball, it will do little good if you only hit your target in the hoof instead of the kill zone. Every bullet can and will kill, no matter how it is designed. In addition, using language such as "maim" is designed more to invoke an emotional response out of a reader rather than a logical, thoughtful decision based on factual data. I would personally recommend that this proposal be rewritten to amend such language and focus on the question at hand. And, unless I am again mistaken, that question is whether or not FMJ bullets fired from a .223 Remington or 5.56 X 45mm Nato weapon will be insufficient in their terminal performance to stop big game animals.

Considering the above-mentioned question, I would also like to point out a few more particulars about this issue. I have personally heard many secondhand stories about deer or other big game being shot with FMJ ammunition from a .223 Remington or 5.56 X 45mm caliber weapon and running off without dying right away. However, I have also not seen much in the way of actual documented evidence to corroborate these stories, despite even having first-hand narratives told to me about the ill-performance of .224 diameter FMJ bullets used on whitetail deer in North Dakota by my own father. Even though I believe that this is a potential problem that should be addressed by the Board of Game since there is enough *circumstantial* evidence to support these stories, I would hope that the Alaska Department of Fish & Game would be able to demonstrate with actual documented ballistic tests and animal remains the inability of the .223 FMJ bullet. If such evidence has yet to be collected, I would also suggest that such evidence be

obtained through public ballistic tests and physical examination of big game corpses shot with such bullets.

Another point of contention with such a proposal would be the affordability of .223 caliber weapons and inexpensive FMJ ammunition for remote bush villages. Often, many hunters and bush villagers do *not* reload their own ammunition, and the cost of a box of soft-tip or hollow-point factory ammunition may be so prohibitive as to negate the ability of these people from affording to take game by such means. If this proposal becomes law, I would hope that the appropriate authorities would consider that not everyone using .223 FMJ bullets to kill game in the bush is in the habit of wantonly wasting the meat, hide, and other parts of game animals that they may kill. Even though certain *poachers* have used .223 FMJ bullets to, basically, slaughter dozens of caribou and other game (such as the reported "massacre", if you will allow the use of such a term in the context of a reference to animals instead of humans, of over 100 caribou on the North Slope last year) illegally, law-abiding people should *not* be punished based on the actions of a few criminals. This proposal should be carefully examined to determine if there is a possible alternative to a ban on .223 FMJ bullets for big game hunting (or to see if a compromise could be made to keep law-abiding hunters free from prosecution under such a law).

Another possible point of discussion would be the use of .223 FMJ bullets by trappers and pelt hunters who do not want to ruin large portions of an animal's hide (or meat, for that matter) by blowing large holes through a skin by using expanding bullets. A FMJ bullet allows for a good clean hole in a hide with a minimal loss of fur and tissue for such hunters. This would be a reasonable application of a .223 FMJ bullet for big game hunting (specifically wolves and wolverines).

If this proposal is being considered due to the loss of many big game animals from .223 FMJ bullets, I would also suggest that banning the bullet itself does nothing to address the fundamental problem here. If a person shoots an animal with a .223 FMJ bullet and fails to collect the animal when it runs further than anticipated before dying, the bullet is not at fault here; the deeper issue is a serious lack of responsibility by the hunter to expend the needed effort necessary to recover the kill. By banning a specific bullet type from being used while hunting, a possible negative legal precedent could be set here. If the Board pursues this proposal, it could open the door for further governmental intrusion into the rights of law-abiding citizens to exercise their Constitutional 2<sup>nd</sup> Amendment right to keep and bear arms with *minimal* governmental regulation and/or interference. Although I sincerely believe that this is not the intention of the supporters of this proposal, I fear that such a ban on FMJ bullets would only pose a serious risk to the future protection of 2<sup>nd</sup> Amendment rights. I understand that other areas of the Lower 48 have already banned such ammunition for hunting big game, but I would also consider these bans to be a controversial intrusion into the rights of legal citizens. Of course, I am an Alaska resident, and such issues are more relevant, at least on a local state level, for each of the citizens of these affected areas. As such, my effort to address such a ban is confined here in Alaska.

Upon further investigation of the text of the proposal, I have also discovered another discrepancy in the description of the design of a FMJ bullet in the "What will happen if nothing is done?" section of the proposal. An FMJ bullet is a copper-jacketed (or other soft metal jacket) bullet that contains a lead core surrounded by an outer metal shell. The description of an FMJ in the proposal says that an FMJ contains a "silver of stainless steel (I do believe that the word "silver" was misspelled and the intended word here was "sliver")" that "zips through" an animal. Such a description is inaccurate; the bullet being described here is more likely an armor-piercing (AP) bullet rather than a FMJ bullet. An AP bullet may contain an outer metal shell as well, but it is the specific bullet type that normally contains an inner steel or tungsten dart or shaft that is designed to punch through bullet-resistant armor. In addition, it is already illegal in the USA to own AP ammunition chambered for *handguns* under federal law (specifically, I believe, it was banned by the 1994 "Brady Bill" that restricted assault weapons' ownership and imposed new restrictions on ammo). An FMJ bullet is **NOT** an AP bullet, and to compare the two bullets as being the same is misleading.

As a final note on this proposal, I would suggest that this ban, if it *must* go into effect despite the other issues noted here, be confined to the .223 Remington and/or the 5.56 X 45mm calibers. There are other calibers that exist that *do* have applications for FMJ bullets in the arena of big-game hunting. These calibers should not be included under the same ban as a .223 Remington FMJ bullet restriction.

It might be of help to direct anyone reading this letter to explore this URL:

<http://forums.outdoorsdirectory.com/showthread.php?t=43606> .< SPAN style="mso-spacerun: yes"> This URL is a thread on the Alaska Outdoors Forum that contains discourse amongst forum members about the proposed ban. The consensus there is that this ban should not be put into effect.

Thank you for your time and attention to this matter. I appreciate your effort in reading this letter, and I look forward to any reply that you might be willing to send to this correspondence.

Sincerely,

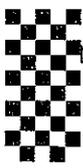
Paul Keller

I have lived on Turnagain Arm for 38 years. I have cross country skied all of these years. I live ~~1/2~~ 1/3 mile from Indian Creek trail head. The trail is heavily used in the winter months for skiers and their dogs. Myself included. In the last 2 winters 3 dogs have died in traps in this area. I now cannot ski this trail with my dog. This is not fair to the people that want to enjoy skiing on trails in Chugach State Park.

Trapping should not be allowed on trails. One mile off the trails would make it safe for people to take their dogs skiing with them. Allowing a few trappers the right to trap on this trail makes it unsafe for the rest of the people not to be able to enjoy. Trapping is not compatible near trails where they are people, families and dogs. Please change this regulation so the people can feel safe to ski on trails in Chugach State Park. If you do not change this regulation dogs will continue to be killed in traps.

Thank you.

Kathy Fletcher-Cullen



Page 1 of 3

I urge the BOG not to adopt any kind of bonus/preference pt. system in Alaska at the present time for big game hunting.

As I understand it, some residents want to implement a bonus pt. system because they are disgruntled about not drawing a bison permit. Be that is it may, there's only been a 70% avg. harvest level on bison in the past 10 yrs. - a lot of people who draw this permit give up trying in a relatively short time once they discover how difficult and expensive it can be. Using the cant-draw-a-bison tag excuse may not justify the distinctly possible longterm negative effects for resident hunters - especially YOUNG resident hunters.

A bonus pt. system will effectively eliminate ALL resident youth drawing hunt opportunities affected by bonus pts. in only a few years. It's a very simple theory: KIDS WITH NO BONUS PTS. = NO PERMITS = FEWER HUNTING OPPORTUNITIES!

Furthermore, if the state adopts a bonus pt system, we will be stuck with it because of the enormous expense required to institute it. Like it or not, we'll be stuck with it.

P. 2 of 3

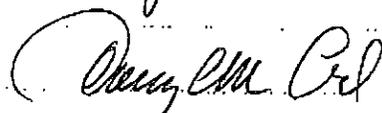
Also, there are companies out there across the U.S. (especially the Western and Southwestern States) that specialize in helping hunters apply for hunting permits, bonus pts, preference pts, etc in the states that have such systems in place (virtually ALL of the western states!...). Some of these outfits are already telling their clientele to keep an eye on Alaska - that rumor has it there will be a bonus pt. system in place here soon. EVERYONE WANTS TO GET IN ON THE GROUND FLOOR, even if they don't have imminent plans to come to hunt in Alaska in the near future.

Alaska will in all likelihood see a significant spike in the number of nonresident applicants if a bonus system is instituted. Likewise, a good many resident hunters who seldom if ever apply for drawing hunts may begin to do so to start stockpiling bonus pts for some species "just in case", especially if they can purchase "bonus points only" for some species they may want to hunt 10 yrs down the road. I know I would - AND I DO! I have applied for several years in MOST western states for decisions species - especially sheep - and although in some states I have quite a few pts, I've never drawn a premium tag. BUT I HAVE IN ALASKA  
WHERE THERE'S NO PT. SYSTEM !!!

Page 3 of 3

In my opinion, it's way in the resident hunters of Alaska's best interest to compel the State of Alaska to stay under the radar and not draw the attention of the entire hunting world by maintaining the status quo. To do otherwise will inevitably attract the attention of thousands of more applicants than we otherwise see on an annual basis. We should think long and hard about it before changing a system that has worked quite well for ALL Alaskans.

Thank you,



DOUGLAS CORL

Box 1570

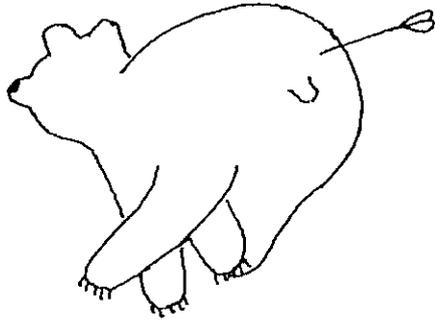
Petersburg Alaska 99833

office: ph + fax : 907-772-4037

cell : (907)-518-0364

I urge you to contact me with any questions, or if I can be of further assistance in this matter.

Larry Kaniut  
4800 Natrona  
Anchorage, AK 99516  
(907) 345-1475; 868-3437  
email: [kaniut@alaska.net](mailto:kaniut@alaska.net)  
URL: [www.kaniut.com](http://www.kaniut.com)



1/30/2009

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FEB 04 2009

BOARDS

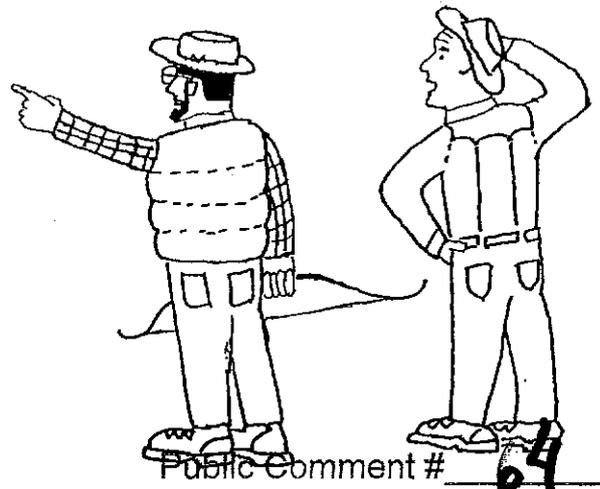
Mr. Rossi-

Having had no success acquiring your address from the Alaska state website I'm mailing this to you via the Board address.

I'm ready, willing and able to rally people in behalf of this proposal and look forward to hearing what will become of the overpopulation of moose and bears in Anchorage.

Thank you.

P.S. Congratulations on your recent appointment.



"I THINK I GOT HIM IN THE HEART."

January 5, 2009

Alaska Board of Fisheries/Game  
POB 115526  
Juneau, AK 99811-5526

Dear Board,

Having resided in Anchorage since 1966 it has become apparent to me that it's time to thin the herd. We have more moose and bears and more humans being injured by them than in Anchorage's history. From 1970 to 2000 (30 years) my wife and I had 2 bear sightings within a mile of our home. From 2000-2007 we saw 2-5 every day in our yard. Last summer a juvenile delinquent black was in our chicken run until I sprayed him with pepper (I reported it to ADFG anticipating killing it if it returned).

In the interests of public safety we request a reduction of 10% of Anchorage bears in 2009. This could be accomplished by way of an archery season (certified archers only) or asking for qualified volunteers who could be tested at the range (to shoot bears with weapons that would not endanger humans).

We propose manageable fish weirs on salmon streams downstream from human use areas (such as hiking, biking, skiing trails) which should minimize bears' presence. Any bear downstream of the weir has a death penalty. Other habituated bears would be harvested by certified archers or designated ADFG "harvesters." Hides could be retained by hunters or turned over to ADFG; same with meat.

Reducing bear numbers will be enhanced by reducing attractants. Because moose calves are the bears' primary attractant to Anchorage, we request at least 20 animals be harvested by archers before December 2009 (and that number be repeated or increased in 2010). OR that these animals be transferred to Alaska Moose Federation for removal to more densely populated moose areas.

The people in the group that I represent (B.E.A.R.S.—Bear Elimination And Related Strategies) agree that it's time to thin the numbers and hope that the Board initiates a doable program for doing so.

Thank you.

Larry Kaniut 4800 Natrona Anchorage, AK 99516 kaniuit@alaska.net

P.S. It's possible that Hunter Education would benefit by selecting—allowing young people observe this community problem and as future problem-solving citizens.

Public Comment # 64

RECEIVED  
FEB 05 2009

BOARD

**Hello,**

**We immensely enjoy the sandhill cranes that visit us each year. It brings the most beautiful feeling to our hearts when 7 land near our home ... It adds to our well-being to watch their antics, their behavior, their life.**

**The last few years less and less show up. (We know of two that was shot last year not far from here) WE ARE EXTREMELY CONCERNED. Because being around them enhances our lives and many many others like us who appreciate them.**

**There is no reason that these beautiful birds should be hunted.**

**Please stop the hunting... It is in your hands to do your part in the survival of wildlife —The wonder and beauty of the birds and other creatures... It is A VERY CRUCIAL PART...**

**We will be diminished as human beings just a little more if they are gone**

**THANK YOU**

*Deborah Moore*

*Buy Moore*

*Mary J. Elliott*

*Mark White*

*Justin Thompson*

*SAM WAKEFIELD*

*Elizabeth Kuppel*  
*Kay Beckelmann*

RECEIVED

FEB 05 2008

BOARDS

Daniel Elliott  
950 E. Fairview Loop  
Wasilla, AK 99654  
(907) 376-5196

Attn: BOB Comments  
ADFG Boards Support Section  
Juneau, AK 99811-5526

Proposal 71 . I support . Fur isn't prime in October and April and the by-catch of fox and lynx is wasteful.

P. 73 I oppose . Especially in the southern area of 13E closer to Talkeetna, summer is well advanced in late June and hides of a lesser value. I assume this proposal would not change the bear baiting ban in Denali State Park.

P. 74 I oppose . By late June summer is well advanced and hides of a lesser value. I assume this proposal would not change the bear baiting ban in Denali State Park.

P. 76 I would oppose this proposal if it were to include Denali State Park . This area <sup>(DOSP)</sup> has somewhat different management objectives than general state lands . It also has excellent access via highway and railroad . Further a visitor center is being planned here . If this proposal would be for areas outside Denali State Park, I would be neutral, although I would remind the Board that brown bears are valuable to guides.

P 79 I oppose if this were to include Denali State Park which has different management objectives. I am neutral on this proposal if it does not include DSP.

P 82 I support. While I personally salvage tongue, heart & liver, I believe it unreasonable to bring the head and hide in if a hunter does not want to. Leaving them in the field saves wasted effort & keeps them out of the Borough landfill. Demanding that the head and hide be kept is an added burden to those not using ATVs.

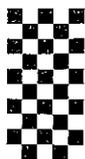
P 83 I support. This is reasonable. The intent of the current salvage rules ~~are~~ <sup>is to</sup> undermine support for Tier II hunts in favor of general hunts. Being nasty shouldn't be a factor in regulations, being reasonable should.

P 85 I support. This is reasonable. The intent of the current regulation on destruction is to undermine support for Tier II hunts in favor of general hunts. Being spiteful shouldn't be a factor in regulations.

P 114 I oppose. The reason the ARA has been the boundary is because it is the eastern boundary of Denali State Park. There is hunting access already to this area via snowmachine and the ARA. In fact there are numerous homes and recreational cabins in this valley. There are numerous

hunters and trappers in this area that would be unfairly impacted.

P 192 I oppose. I do not oppose ADF+G personnel using helicopters for predator control. I do oppose any changes that would allow non-government persons to use helicopters in any way. ~~The~~ Hunters have a hard enough time as it is with the general public; allowing helicopters into the mix will worsen the public's attitude toward game management.



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FEB 02 2009  
BOARDS

February 2, 2009

ATTN: BOG COMMENTS  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Fax : 907-465- 6094

Proposal 13 - AAC 92.057 I am in opposition to this proposal to require nonresidents to be required to have guide/client agreement to apply for 14C dall sheep drawing permits.

The nonresidents should be able to choose a guide on there own. If a guide wants to register the GUA for the clients wanting to apply for these hunts it should be his/her decision to do so. At this time a few guides are flooding 14C, 13D, and Tok with nonresident applications . If a guide /client agreement is needed for a nonresident to apply for dall sheep hunts in 14C there needs to be a limit on how many guide/client agreements a guide can sign and submit for each hunt in 14C. This practice is used for brown bear hunts on Kodiak, 3 hunts for DB - 104, a guide registered in that GUA can only sign 3 guide/client agreements for that hunt.

Requiring guide/client agreements for this hunt will only benefit the guides that are flooding the application process at this time , which is what they want.

Proposal 14 - 5AAQC 85.055 I support this proposal to limit nonresident hunters to 10 percent or less of the available permits for Unit 14C Dall Sheep.

There should be a listed limited number of permits for nonresidents for each group of hunts in GMU 14C. Nonresidents should be able to research and choose a guide to conduct their hunt in the GUA. No guide/client agreement required. If a guide/client agreement would be required, make it so that a guide can only sign as many guide/client agreements as there are specific hunts for that area.

Example: 14C Northwest DS - 130 - 8 permits available, 2 hunts nonresident, guide registered in area can only sign 2 guide/client agreements for this hunt. DS - 131, DS - 132 would be the same. Each 14C hunt unit broken down this way.

Proposal 15 - 5 AAC 85.055 I oppose the proposal to eliminate nonresidents from being able to apply for drawing permits for 14C Dall Sheep.

Nonresidents should have their own drawing permit hunts and these hunts should be applied for separately from the resident hunts as done in GMU 13D, 14A for dall sheep.

In my opinion all drawing permit hunts for dall sheep in all GMU's should have separate nonresident hunts listed.

Proposal 16 - 5 ACC 85.055 I support this proposal to limit nonresident sheep tags in Unit 14C.

I support option 2, create separate drawing hunts for nonresidents. Allocate not more than 10% of the tags of all the hunts to nonresidents.

If guide client agreements become required for nonresident hunters wanting to apply for dall sheep drawing permits in unit 14C a limit of how many guide/client agreements a guide can sign for a specific hunt should be included. Example ; 14C Southwest Area Hunt has a total of 24 hunts. DS - 136 , 137 ,138 eight hunts each. Say 2 hunts from each were nonresident only hunts. A guide could only sign 2 guide/client agreements from each hunt.

Proposal 17 - 5AAC 85.055 I oppose the proposal to modify the permit allocation for dall sheep in Unit 14C as proposed.

14C Central 1 permit should be resident only. I believe a separate nonresident drawing for hunts in 14C is needed.

A restriction on how many client applications a guide can submit for these drawing permits is what is needed. As I have said above, it is in effect on Kodiak for nonresident applications for brown bear drawing permit hunts. Guides can only submit as many guide/client agreements as there are hunts for that specific hunt area. This system should be in place for all nonresident drawing permit hunts.

This proposal does nothing to prohibit a guide from having as many clients as he/she can get to apply for a specific

nonresident hunt. Limiting the number of and making separate draw for nonresident hunts will improve resident chances of drawing permit. Limiting guide / client agreements to only as many agreements to hunts offered per guide will give other guides better chance for their clients to draw permit.

Proposal 19 - 5 AAC 85.055 I oppose the suggestion that all sheep hunting in Unit 14C should be resident only.

I do support that a portion of the total hunts be allotted to nonresidents. Nonresidents have their own drawing and guides have restrictions on how many nonresident applications they can submit for any of the nonresident hunts.

I oppose making the early (August 10 -22) season resident only.

Guides are having nonresident sheep clients submit applications in record numbers. The guides need to be limited on how many applications they can submit. As evidenced last year in 14C, Upper Eagle River Hunt DS - 134 all 3 permits went to nonresident hunters.

Proposal 4 - 5 AAC 85.040 Hunting seasons and bag limits for goat: I support the proposal to open a registration hunt for goat in Unit 14C.

Early bow season to stay the same. September 1 - October 15 should return to registration hunt.

Last years drawing permit hunts for goat was a failure.

Proposal 106 - 5AAC 85.055 I support creating a archery hunt for dall sheep for residents and nonresidents in Units 14A and 13D. I do not support the hunt date. Date should be August 10 - September 20. Drawing permit hunts for nonresidents should be separate from residents. Guide/client agreements required for non residents . Guides limited to submitting only as many applications as hunts allotted. ( 3 nonresident archery hunts 13D guide can only sign 3 guide/client agreements for that hunt.

Proposal 107 - 5 AAC 85.055 I support an archery only draw for sheep in Unit 13D for nonresidents and residents. Separate drawings for residents and nonresidents. I support dates for hunts August 10 - October 15. Add guide/client agreements required for nonresident applicants with guides only signing as many agreements as there are hunts.

Proposal 109 - 5 AAC 85.055 I support this proposal for Units 13 and 14 to put sheep hunting for nonresidents in the Talkeetna Mountains on a drawing permit , and keep it as an open hunt for residents.

I believe this would be a starting point. I would not like to see what happened in Unit 13D last year where 33 resident permits were issued and 8 nonresident. The numbers would have to be increased.

Proposal 111 - 5AAC 92.050 Required permit hunt conditions and procedures. In Unit 13D, 14A, and 14C, require a guide/client agreement when applying for a draw hunt permit.

I oppose the requirement that all nonresidents who apply for sheep and goat drawing tags in Units 13D, 14A, and 14C have a guide/client agreement signed before or at time of making application.

Nonresidents should be able to choose the guide they want to hire. Not be forced to use a guide that has made his own choice to register a GUA in one of these areas and have a bunch of his clients put applications in for the hunts.

If guide/client agreements will be required for all sheep and goat nonresident drawing permits guides must be limited to signing only as many agreements as there are hunts .

The guide/client agreement requirement for sheep last year in 13D and 14A was a failure, to many guides competing for to few permits (10 non resident permits 13D East and West, 4 nonresident permits for 14A.

The Tok hunt 100 permits has no nonresident allotment, nor does the Delta hunt 150 permits. I believe it is time to level the field. Delta hunts do not even require guide/client agreements. What is the thinking there to require agreements for some hunts and not others?

Proposal 164- 5 AAC 85.040 Hunting seasons and bag limits for goat. Allocate permits in Unit 8 to nonresidents as follows: 30% of Unit 8 mountain goat permits will be separately allocated to non residents. ( 30% of 500 hunts 150 hunts) I support

this proposal. Nonresident applicants are more committed to conducting the hunt.

Proposal 209 - 5AAC 85.055 Hunting seasons and bag limits for Dall Sheep. Modify the sheep hunts in 14A and 13D as follows:

I support returning Units 14A and 13D to harvest ticket , non drawing hunts with the definition of a legal sheep being a ram of full curl or eight years old, or both horns being broomed / broken.

Requirements for guide/client agreements for nonresidents and low available permit numbers for residents and nonresidents made these hunts failures last year. These areas have light resident and nonresident hunting pressure. Nonresidents do better in these areas because guides scout areas and have the knowledge to conduct a successful hunt. It is expensive to be flown into these to units for residents.

Gaary S. Munoz / Registered Big Game Guide # 743  
2095 N. Belmont Avenue  
Palmer, AK 99645  
907-745-2834

Public Comment # 67



February 2, 2009  
ALASKA DEPARTMENT OF FISH AND GAME  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
(907) 465-6094 FAX

RECEIVED  
FEB 02 2009  
BOARDS

To Whom it May Concern,

I am writing in support for Board of Game Proposal #118 that would close the season on Sandhill Cranes in the Kachemak Bay area. I recently moved here and was overjoyed to have a pair of cranes coming and going during the summer in my neighbor's yard. They also walked up and down the dirt road among the four to five houses here. They were timid, though not overly frightened. They would pass by me about 15 feet away as I washed my car. I was always worried about them since there are dogs in the yard running loose below our house and eagles roosting in the trees nearby. I know from what I have read that their numbers here are low and the numbers of predators, especially of their colts, are high.

I am not against hunting in general, but hunting a limited resource is not a good idea. Maybe by closing the season for 10-20 years we can see an increase in their numbers that would allow a season with a sustainable harvest in the future. I myself would love to taste one someday, though I would be hesitant to shoot one. I have the same mixed emotions hunting or fishing any animal.

Thank you,  
Christy Tyler  
1876A Triton Court  
Homer, AK 99603

RECEIVED  
JAN 20 2009  
BOARD

3778 West 13<sup>th</sup> Avenue  
Vancouver, British Columbia  
Canada V6R 2S6  
January 12, 2009

ATTN: BOG Comments  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK. 99811-5526

Dear Sir or Madam:

Enclosed please find my comments on sixteen (16) of the proposals included in your Spring 2009 Southcentral Proposal Book.

These comments, extending over three pages, offer my opinions regarding hunting of brown bears in Katmai National Preserve, hunting of brown bears and wolves in other national preserves, hunting of black bears in Prince William Sound, hunting of female mountain goats, hunting of sandhill cranes near Homer, the need to count wounded animals against bag limits, and the importance of prohibiting 223 caliber full metal jacket bullets for hunting.

Thank you for your kind and thorough consideration of my comments.

Sincerely,



Roberta Olenick, M.Sc.

**Comments to Alaska Board of Game  
on Spring 2009, Southcentral Proposal Book**

submitted by Roberta Olenick  
3778 West 13<sup>th</sup> Avenue, Vancouver, B.C. Canada V6R 2S6

**Proposals:** 42, 43, 44 and 45, concerning reducing hunting pressures on brown bears in Katmai National Preserve Unit 9C

**Position:** Support.

**Reasons:** Bear viewing and bear hunting are completely incompatible activities. Any hunt of these habituated bears is unethical in that the principle of "fair chase" cannot possibly apply. Photographers who have been visiting this region for many years have noticed a significant reduction in bear sightings since hunting levels have increased. Reduced bear sightings will result in reduce visitation by bear viewers and, thus, in lost economic benefit from these tourists. People who include bear viewing as part of their Alaska travels spend twice as many tourist dollars in the state as other visitors.

As a wildlife photographer, I cannot in good conscience visit Katmai until hunting in this area is curtailed as I do not want to contribute to the habituation of bears who will then be put at greater risk of being shot as a result of their tolerance of humans. Plus I do not want to be put at risk myself by hunters or bears wounded by hunters. I expect there are many others who feel the same way. Once the hunt is curtailed, I will eagerly visit Katmai repeatedly for extended periods.

All four of these proposals should be implemented, as opposed to just selecting one, as all of them together promote more protection for Katmai bears than any one individually. It is unfortunate that no proposal has been put forward to stop all brown bear hunting in Unit 9C as that is what I would most fully support. Stopping this hunt would still leave vast (and the majority of) areas of Alaska open to brown bear hunting.

**Proposals:** 51, 77, 78 and 174, concerning reducing hunting pressures on brown bears in Lake Clark, Wrangell-St. Elias and Denali National Preserves

**Position:** Support

**Reasons:** Current brown bear hunting levels in these three preserves have been set to manage for increased ungulate populations for human consumption and are, therefore, a form of predator control. This is in clear violation of the Alaska National Interest Lands Conservation Act. Wildlife on national preserve lands must be managed according to federal laws, regulations and policies, and not the state of Alaska's. Current bear hunting limits in the specific areas discussed under these proposals are excessive and cannot ensure the healthy bear populations stipulated according to federal requirements. Left unchecked, this situation will ultimately lead to a legal confrontation between federal and state authorities.

**Proposals: 67, 112, and 186**, concerning reducing hunting pressures on wolves in Lake Clark, Wrangell-St.Elias and Denali National Preserves

**Position:** Support

**Reasons:** Current wolf hunting levels in these three preserves have been set to manage for increased ungulate populations for human consumption and are, therefore, a form of predator control. This is in clear violation of the Alaska National Interest Lands Conservation Act. Wildlife on national preserve lands must be managed according to federal laws, regulations and policies, and not the state of Alaska's. Current wolf hunting limits in the specific areas discussed under these proposals are excessive and cannot ensure the healthy wolf populations stipulated according to federal requirements. Left unchecked, this situation will ultimately lead to a legal confrontation between federal and state authorities.

**Proposals: 30 and 31** concerning reducing hunting pressures on black bears in Unit 6D

**Position:** Support

**Reasons:** Current harvest levels in Prince William Sound are above sustainable levels. If hunting and bear viewing are to continue here, hunting pressures must be reduced.

**Proposals: 29 and 201**, concerning wounded black and brown bears, respectively, being counted against bag limits

**Position:** Support

**Reasons:** These proposals will reduce loss and suffering of wounded bears, reduce public safety hazards associated with wounded bears, promote respect and stewardship for wildlife, and encourage accurate marksmanship. They will ensure bear populations do not experience greater harvest than was intended by the set limits. This proposal should not be restricted to bears, but should apply to all hunted wildlife in all regions of the state.

**Proposal: 244**, concerning prohibition of 223 caliber full metal jacket bullets for hunting big game

**Position:** Support

**Reasons:** This ammunition is inappropriate for hunting as it causes excessive occurrences of wounding, maiming and crippling of wildlife. Wounds produced by these bullets do not bleed openly, making tracking and recovery of hit animals difficult. Prohibition of this ammunition would reduce waste and loss of game. This proposal should be extended to apply to all wildlife species hunted in Alaska and to all areas of the state.

**Proposals: 36, 142, and 204,** concerning reducing hunter mortality of female mountain goats

**Position:** Support

**Reasons:** Of all North American ungulates, mountain goats are particularly vulnerable to hunting pressures because they reproduce slowly, they do not respond to hunter mortality with compensatory survival or reproduction, and nannies are hard to distinguish from billies. Herd survival is strongly dependent on numbers of adult nannies, so hunters who take nannies either intentionally or by mistake have a significant impact on goat populations. These three proposals address this concern either by reducing bag limits on nannies or requiring hunters to learn to distinguish between males and females of this species.

**Proposal: 118,** concerning the elimination of sandhill crane hunting in Unit 15C

**Position:** Support

**Reasons:** Homer's sandhill cranes are an important tourist attraction and are also enjoyed non-consumptively by local birders, photographers and other residents alike. This population is currently subjected to numerous downward pressures and very low rates of recruitment have been recorded in recent years. All available data indicate hunting of these cranes is unsustainable and therefore must cease, to ensure conservation of this population.



National Parks Conservation Association ♦ Alaska Regional Office  
750 W. 2<sup>nd</sup> Ave. Suite 205, Anchorage, AK 99503 (907) 277-6722  
*Protecting Our National Parks for Future Generations*

**RECEIVED**  
**JAN 30 2009**  
**BOARDS**

30 January 2009

Cliff Judkins  
Chairman  
Alaska Board of Game  
P.O. Box 25526  
Juneau, AK 99802-5526

Re: March 2009 Board of Game Proposals 42, 42, 44, 45, 47, 49, 50, 51, 52, 55, 63, 67, 68, 69, 71, 74, 75, 77, 78, 79, 112, 166, 168 173, 174, 186.

Dear Chairman Somerville,

The National Parks Conservation Association (NPCA) appreciates the opportunity to comment on March 2007 Board of Game Proposals. The National Parks Conservation Association (NPCA) is America's only private, nonprofit advocacy organization dedicated solely to protecting, preserving, and enhancing the National Park System. NPCA was founded in 1919 and today has 340,000 members of more than 1,000 are in Alaska.

We have nine proposals before the Board for consideration, eight of them relate to the conflict we see between the state's Intensive Management approach to wildlife management and the approach the National Park Service is tasked with under its enabling legislation and direction from both its Management Policies and the Secretary of Interior's office in Washington D.C. We will comment on our proposals in the context of others up for consideration as we present both a discussion of our management philosophy concerns and comments on specific proposals.

DIFFERENCE IN MANAGEMENT PHILOSOPHY

Many of the proposals before the board are requesting that the state institute wildlife management regulations that are contrary to and conflict with the purposes of Alaska's national parks as recognized by Congress in the Park Service Organic Act and the Alaska National Interest Lands Conservation Act (ANILCA). NPCA strongly feels that the

Public Comment # 70

Board of Game is NOT the appropriate forum for determining wildlife management policy in Alaska's National Parks, Monuments and Preserves, especially programs that manipulate the populations of predators. Population manipulation and predator control are fundamentally at odds with the purposes for which units of the National Park System in Alaska were created.

The National Park Organic Act of 1916, as amended, sets forth very clear direction for how our national parks are to be managed including the fundamental purpose of the national park system which

*"...is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."*

As amended in 1978, Congress further emphasized that

*"the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress."*

Alaska's National Parks created or expanded by the Alaska National Interest Lands Conservation Act of 1980, benefit in Section 101 from language that set forth Congressional intent:

*"to provide for the maintenance of sound populations of, and habitat for, wildlife species of inestimable value to the citizens of Alaska and the Nation, including those species dependent on vast relatively undeveloped areas: to preserve in their natural state extensive unaltered arctic tundra, boreal forest, and coast rainforest ecosystems..."* Each unit is to be further managed *"for the purposes for which each conservation system unit is established."*

This management direction from Congress is very clear and is in conflict with management direction frequently taken by the Alaska Board of Game. We do recognize that Intensive Management is the predominant wildlife law for the state of Alaska, we just don't think it should be applied to lands managed by the National Park Service. Hunting is allowed in National Preserves, but only so far as to not-conflict with park purposes. We are not against hunting, but we are very concerned about the level of hunting occurring now and proposed increases in the future. Simple exemptions of those lands managed by NPS when conflicting regulations are adopted would address many of our concerns.

With this understanding of the difference in management approach, NPCA submits the following comments on proposals organized into three subject areas: Population Manipulation, Bait Stations, and Predator Control on Lands Adjacent to Parklands.

#### POPULATION MANIPULATION:

There are a number of proposals that we oppose based on their stated objective to reduce bear and/or wolf populations in order to increase moose and caribou populations. As we have shown, there is a fundamental difference between the state of Alaska's management philosophy and that of the National Park Service. The state of Alaska feels it is directed to maximize opportunity for human consumption of species like moose and caribou. As such, the state has devised a system of intensive management leading to predator control areas and the systematic reduction of wolf and bear populations. While this may be the state's approach to wildlife management, it clearly conflicts with the mandate of the National Park Service to not "intervene in natural biological or physical processes," except in rare circumstances (NPS management policies at 4.1) and not to manipulate wildlife populations in order to increase the population of harvested species.

More specifically to the actions proposed below, the Park Service's management direction is clearly stated in section 4.4.3 of its Management Policies:

*The Service does not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species (i.e. predator control), nor does the Service permit others to do so on lands managed by the National Park Service.*

This clear direction against population manipulation was further refined in a December 19, 2006 letter to the Eastern Interior Alaska Subsistence Regional Advisory Council from the Acting Assistant Secretary for Fish, Wildlife and Parks which stated that

*To summarize, undertaking intensive management practices, including predator control activities as conducted by the State of Alaska, is not allowed on NPS lands*

With this basic difference in mind, NPCA offers its comments on the following proposals on lands managed by the National Park Service.

**Proposal #47** – We don't accept that there can be an overpopulation of brown bears in a unit of the national park system. What's there is the naturally occurring population level of bears and that should be preserved. As such, we opposed increasing the bag limit for brown bears to one every regulatory year. Should the Board of Game adopt this proposal, we would ask that National Park lands in Aniakchak National Preserve be exempt.

**Proposal #51** – This is one of NPCA's proposals requesting a roll-back in brown bear hunting regulations to the regulatory level when Intensive Management was first passed

into state law. We make our case in the text of the proposal (page 43) and won't reiterate it here, but suffice to say that Congress was aware of the level of hunting when it created Lake Clark National Preserve in 1980 and that level has significantly liberalized as a result of Intensive Management. To remove the conflict with federal mandates, the season length and bag limit should be rolled back to 1993 levels for those portions of Unit 17B that are in Lake Clark.

**Proposal #52** – We oppose this proposal as it directly conflicts with our position in Proposal #51. Should the Board of Game adopt this proposal, we would ask that National Park lands in Lake Clark National Preserve be exempt.

**Proposals #64 and #67** – These are both NPCA proposals requesting a roll-back in wolf hunting regulations to the regulatory level when Intensive Management was first passed into state law. We make our case in the text of the proposal (pages 61 and 64 respectfully) and won't reiterate it here, but suffice to say that Congress was aware of the level of hunting when it created Aniakchak, Katmai and Lake Clark national preserves in 1980 and that level has significantly liberalized as a result of Intensive Management. To remove the conflict with federal mandates, the season length and bag limit should be rolled back to 1993 levels for those portions of Unit 9 that are in Aniakchak, Katmai or Lake Clark and for those portions of 17B that are in Lake Clark.

**Proposals #77 and #78** – These are both NPCA proposals requesting a roll-back in brown bear hunting regulations to the regulatory level when Intensive Management was first passed into state law. We make our case in the text of the proposal (page 72) and won't reiterate it here, but suffice to say that Congress was aware of the level of hunting when it created Wrangell-ST. Elias National Preserve in 1980 and that level has significantly liberalized as a result of Intensive Management. To remove the conflict with federal mandates, the season length and bag limit should be rolled back to 1993 levels for those portions of Units 11 and 13 that are in Wrangell-ST. Elias.

**Proposal #79** – We oppose this proposal as it directly conflicts with our position in Proposal #77. Should the Board of Game adopt this proposal, we would ask that National Park lands in Wrangell-ST. Elias National Preserve be exempt.

**Proposal #112** – This is one of NPCA's proposals requesting a roll-back in wolf hunting regulations to the regulatory level when Intensive Management was first passed into state law. We make our case in the text of the proposal (page 99) and won't reiterate it here, but suffice to say that Congress was aware of the level of hunting when it created Wrangell-ST. Elias National Preserve in 1980 and that level has significantly liberalized as a result of Intensive Management. To remove the conflict with federal mandates, the season length and bag limit should be rolled back to 1993 levels for those portions of Unit 13 that are in Wrangell-St. Elias.

**Proposal #173** – We oppose this proposal as it directly conflicts with our position in Proposal #174. Should the Board of Game adopt this proposal, we would ask that National Park lands in Denali National Preserve be exempt.

**Proposal #174** – This is one of NPCA’s proposals requesting a roll-back in brown bear hunting regulations to the regulatory level when Intensive Management was first passed into state law. We make our case in the text of the proposal (page 144) and won’t reiterate it here, but suffice to say that Congress was aware of the level of hunting when it created Denali National Preserve in 1980 and that level has significantly liberalized as a result of Intensive Management. To remove the conflict with federal mandates, the season length and bag limit should be rolled back to 1993 levels for those portions of Unit 16B that are in Denali.

**Proposal #186** – This is one of NPCA’s proposals requesting a roll-back in wolf hunting regulations to the regulatory level when Intensive Management was first passed into state law. We make our case in the text of the proposal (page 153) and won’t reiterate it here, but suffice to say that Congress was aware of the level of hunting when it created Denali National Preserve in 1980 and that level has significantly liberalized as a result of Intensive Management. To remove the conflict with federal mandates, the season length and bag limit should be rolled back to 1993 levels for those portions of Unit 16B that are in Denali.

#### BAIT STATIONS:

There is plethora of scientific literature that speaks to the negative changes in bear behavior when they start eating human food. In his book “Bear Attacks: Their Causes and Avoidance,” Stephen Herrero says that bears conditioned to human food are considerably more likely to injure people than bears that are not. A food habituated bear is a threat to anyone it may encounter and ultimately such encounters can cost the bear its life. The National Park Service at Yellowstone learned its lesson in the 1960s and cleaned up its garbage dumps. Visitors to the National Park system can be cited for feeding wildlife under 36 CFR 2.2(a)(2). National Park Service Policy (4.4.1) clearly directs its managers to “maintain native plants and animals by preserving and restoring the natural ... behaviors of native plant and animal populations...” The National Park Service understands that food and bears don’t mix and to ensure the safety of park visitors they’ve implemented park specific rules and regulations through each park’s Compendium. As such, we oppose the following proposals that increase the use of bait and bait stations on national park lands. Should the Board of Game seek to adopt any of these proposals, we would ask that National Park lands be exempt.

**Proposal #74** – extending the season for black bear baiting from June 15 to June 30 in those portions of units 11 and 13 that are in Wrangell-ST. Elias National Preserve puts black bear baiting occurring in a unit of the national park system that is inviting visitors from all over the world to come explore the backcountry and experience Alaska’s wildlife. Because of the absolutely obvious conflict being set up with park visitors, this season should be shortened, not lengthened.

**Proposal #75** – the intent of this proposal seems to be the inclusion of brown bears in the ongoing baiting program. NPCA is opposed to the baiting of any predator in a unit of the national park system and we certainly don't see the advantage of conditioning brown bears to bait in a park we are inviting visitors to experience. On the contrary, we see a significant conflict and serious negative impacts should brown bears be included in bait programs in and around Wrangell-ST. Elias.

**Proposals #166 and #168** – both of these proposals have multiple suggestions for liberalizing the use of bait to hunt black bears and they are all bad ideas, including keeping bait stations open all summer. These are lands in Denali National Preserve and adjacent to Lake Clark National Preserve, both places where summer visitors from around the world travel to see. The conflicts with ongoing bait stations are obvious and these proposals should be rejected.

#### PREDATOR CONTROL AREAS ADJACENT TO PARKLANDS:

While these proposals to establish predator control areas don't directly impact lands managed by the National Park Service, as overt predator control is not allowed there, they do abut national park lands and, as such, are of concern to wildlife living in national parks, preserves and monuments. The Park Service's Congressional mandate to manage for populations of wildlife could be impacted by the aggressive nature of predator control immediately adjacent to its boundaries. Should any of these proposals be adopted, we request that the Board include a buffer zone to ensure that wildlife that primarily lives on adjacent federal parklands is not killed in the state's predator control program when they stray outside those boundaries. Without an adequate buffer zone for park wildlife, we are opposed to these proposals.

**Proposal #49** – affecting lands adjacent to Lake Clark National Park & Preserve.

**Proposal #50** – affecting lands adjacent to Lake Clark National Park & Preserve.

**Proposal #68** – affecting lands adjacent to Lake Clark National Park & Preserve.

**Proposal #69** – affecting lands adjacent to Aniakchak National Monument & Preserve, and Katmai and Lake Clark national park & preserves.

#### ADDITIONAL PROPOSALS WE SUPPORT:

NPCA supports **proposal #55**. Changing the Intensive Management population and harvest objectives for the Mulchatna Caribou Herd can only result in a more rationale view of predator targets across the range of the herd.

NPCA supports **proposal #71** shortening the season on coyotes to reduce the number of fox and lynx by-catch.

## KATMAI NATIONAL PRESERVE

**Proposals 42 to 46** all address the current hunting situation in Katmai National Preserve where bear hunting is allowed. NPCA recognizes that Congress intended for hunting to occur in this area, otherwise it would not be a national preserve and, rather, would have been included as part of the adjacent Katmai National Park. As such, NPCA seeks a solution that would allow a high quality brown bear hunt to continue while, at the same time, providing for a high quality brown bear viewing experience. The concern is over harvest of bears.

The decline in bear numbers was first identified by local bear viewing guides Ken & Chris Day, who have spent 75 days each summer for the past 13 years in Katmai Preserve. Twelve years ago it was not uncommon to see 35 to 60 bears a day. In 2006, a typical daily count was 10 to 11 adult bears. And the numbers of bears at McNeil River is also declining – about 22% since the 1990s.

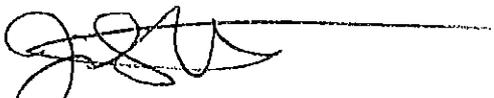
This issue was brought forward in previous board meetings, the most recent in 2007. The dialogue started at that meeting resulted in several in-depth discussion between many of the parties interested and concerned about the apparent decline in observable brown bears in and around Funnel and Morraine creeks in Katmai National Preserve. The issue is more complicated than just changing the hunting seasons, however that is the part of the solution that is before us at this meeting. The Board should direct the Department to continue to seek a solution to the user conflict between bear hunters, bear viewing guides and fishermen. In the meantime, to err on the side of caution, some change in the hunting season, not a complete closure, should be implemented. You have in these propels several options to choose from.

### SUMMARY

The diversity and vitality of wildlife on Alaska's national park lands is one of the principal differences between parklands in Alaska and parklands in the Lower 48. Congress made it very clear that the National Park Service is to manage this wildlife for "natural and healthy" populations. The vast majority of these proposals before the Alaska Board of Game that impact National Park lands focus on manipulating predator populations to grow more moose and caribou. This simply cannot occur in a unit of the National Park System.

Thank you for the opportunity to comment.

Sincerely,



Jim Stratton  
Alaska Regional Director

Franco & Caroline Venuti Box 3652, Homer, Alaska 99603  
Telephone ~ 907-235-7480 or 399-1550

RECEIVED  
FEB 03 2009  
BOARDS

January 31, 2009

ALASKA DEPARTMENT OF FISH AND GAME  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

We are writing this letter in support of **Board of Game Proposal #118** that would close the hunting season on cranes in GMU15C.

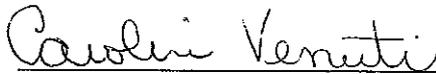
The Sandhill Crane population in the Kachemak Bay area is very low, probably roughly only 200 birds during summer. Local birds face several limiting factors, such as predation, chiefly by excessive Bald Eagles due to winter-feeding and habitat loss due mainly to subdividing of hayfields. To justify crane hunting in this area, population surveys should first be made to see if local numbers are adequate to sustain this small population. Another reason not to permit crane hunting in the Homer area (Unit 15c) is because most of our local cranes have become habituated to human presence, especially activities related to haying. Some cranes actually nest in or near certain rural yards, much to the delight of most residents. The vast majority of Homer area residents and tourists really appreciate the cranes and do not want them to be shot.

Thank you very much for your consideration of this issue.

Respectfully submitted,



F. Venuti



C. Venuti

**Proposal 176**

I support proposal 176. As an avid hunter and outdoorsman I feel that this proposal is one that greatly reduces the risk of losing meat due to warm temperatures. Packing and handling a 1200 pound animal in warm weather has a high probability of losing meat. This proposal is recommended as a means to allow hunters to recover all the meat in a season when temperatures are cooler. The positive aspects of this proposal clearly outweigh any negative aspects. The purpose of hunting in Alaska is to provide a safe and ethical way to harvest an animal and the meat. Proposal 176 does just that.

Bill Fletcher  
Wasilla, Alaska

**Proposal 179**

I support proposal 179. Since implementing the August archery moose hunt the board has heard numerous requests to have the season changed to a later date when hunters do not have to worry about harvesting an animal and then losing the meat due to warm weather. I strongly encourage you to support this proposal to prevent hunters from losing their animal in a season that currently has warm temperatures. Any season that is later than mid August would help prevent this from occurring.

Bill Fletcher  
Wasilla, Alaska

**Proposal 206**

I support proposal 206. The current archery August moose season in Alaska is during a time when warm climate is detrimental to the successful harvest of a moose. The moose population in most of these units is healthy and offering archery hunters a fair chance to harvest a moose promotes hunting as a whole, as is done in the lower 48 states.

Bill Fletcher  
Wasilla, Alaska

**Proposal 207**

I support proposal 207. Alaska is far overdue for offering a youth hunt. ADFG implemented the hunter education requirement which is a great thing. Kids are continuing to be less interested in the outdoors and recreation. Hunters are on the decline. This proposal helps encourage kids to get out of the house and enjoy the outdoors. Hunting is a reward that should be offered to youth's. This proposal does just that.

Bill Fletcher  
Wasilla, Alaska

**Proposal 100**

I support proposal 100. I have been hunting unit 13 for years and over the past couple years I have noticed that the moose population is strong. Currently there are very few units in the state of Alaska that offer archery registration moose hunts. Offering a 10 day archery season in this unit promotes hunting as whole to residents of Alaska. This proposal does not change the antler restrictions already in place in this unit. If the board is not willing to open this as a registration hunt, then I would like them to see if they would review the possibility of implementing an archery draw hunt for residents as an avenue for more hunting opportunities in unit 13.

Bill Fletcher  
Wasilla, Alaska

**Proposal 97, 101, 102, 103**

I oppose proposal 101, 102 & 103. Alaska is the largest state in the US. There is plenty of hunting areas other than unit 13 for guide's to take clients hunting. Unit 13 was closed to non-resident moose hunting for a reason and that was due to hunting pressure and lack of moose. As part of this, Alaska residents also had their season shortened. The moose population in Unit 13 has began to rebound, however before a non-resident season is offered the board needs to institute the original season the residents had and/or offer other hunting opportunities that are mentioned in various proposals that were submitted.

Bill Fletcher  
Wasilla, Alaska

### **Proposal 176 - Hunting Seasons & Bag Limits for Moose**

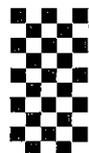
I support of proposal 176. This proposal simply offers an opportunity for hunters to hunt in an area where the moose population is high. Populations in unit 14A obviously remain healthy due to the fact that there is a cow moose drawing hunt from August 20<sup>th</sup> through September 25<sup>th</sup>. Changing the current archery season from mid August to September also reduces the risk of harvesting a moose in a season when temperatures are warm.

*Rob Robinson  
Wasilla, Alaska*

### **Proposal 206 - Hunting Seasons & Bag Limits for Moose**

I support proposal 206. Over the recent years hunting seasons have been shortened, fuel prices have risen and the economy is declining. For these reasons hunters are congregating in smaller areas, which unfortunately places excess pressure on moose. Implementing proposal 206, requiring hunters to choose either rifle or bow, spreading out the season/units reduces hunting pressure overall. This practice seems to be very popular in the lower 48 states for the simple reason to stop hunters from concentrating on certain areas.

*Rob Robinson  
Wasilla, Alaska*



**Proposal 207 - Hunting Seasons & Bag Limits for Moose**

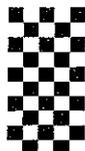
I support proposal 207. As a father and hunter I would like to see an opportunity provided for the youth hunters in Alaska. Most other states offer youth hunting seasons to promote hunting. If a youngster becomes involved at a young age and has a fair opportunity then he or she will help promote hunting in the years to come. It is time Alaska offers a youth hunt. Please support proposal 207 or implement something similar for the youth.

Shawn Hayes  
Wasilla, Alaska

**Proposal 6 - Hunting Seasons & Bag Limits for Moose**

I support proposal 6. As a longtime resident of the Matanuska Valley and avid outdoorsman I must agree that the moose population is strong. Supporting proposal 6 will not allow over harvesting simply for the fact that the antler restrictions still come into play, which allows the prime breeding bulls to thrive. The August hunt that is currently offered is setting a hunter up for possible failure in retrieving the animal. With the warm temperatures a hunter has to take a chance and hope that they can get the large animal out of the field in time before the warm weather becomes a factor. August weather in Alaska is typically warm and wet, not a desirable time to be harvesting a moose.

Shawn Hayes  
Wasilla, Alaska



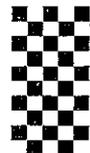
## Proposal 206 – Hunting Seasons and Bag Limits For Moose

**I am for Proposal 206.** This is a great opportunity to offer more hunting options in various seasons and areas with healthy moose populations. Forcing hunters to make a choice between archery and rifle also reduces the hunting pressure during the current seasons.

Dave Mckenzie  
Palmer, Alaska

Public Comment #

73



**Board of Game Proposal Comments**

***Proposal 206 - Hunting Seasons & Bag Limits for Moose***

I am in support of proposal 206. The population of bow hunters in Alaska is growing tremendously. Creating more opportunities while still incorporating antler restrictions will not harm the moose population we are seeing right now. This proposal will also take some of the pressure off of moose during rifle season since hunters will have to make a choice of either rifle or bow. Please support proposal 206 and create more hunting opportunities while minimizing the impact to the moose population.

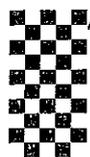
Jerry Fletcher  
Wasilla, Alaska  
376-3730

***Proposal 179 - Hunting Seasons & Bag Limits for Moose***

I am in support of proposal 179. The Anchorage Advisory Committee has a very valid issue here concerning meat care in remote areas when temperatures are warm and wet. Part of hunting is the enjoyment is hiking or traveling into remote areas in search of game. The current August season does not favor this type of hunting. Please consider changing the season to later time in the year as suggested in Proposal 179. Thank you.

Jerry Fletcher  
Wasilla, Alaska  
376-3730

Public Comment # 73



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JAN 30 2009  
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**Proposal 6**

I am in support of proposal 6. As an avid hunter and bow hunter of Alaska I agree that a November Archery Season in Unit 14C needs to be added. This provides an opportune time for hunters to hunt for moose and lessens the chance for spoilage in the field.

Carey Whitlatch  
Wasilla, Alaska

**Proposal 176**

I am in support of proposal 176. As an avid hunter and bow hunter of Alaska I agree that the current archery season in Unit 14A needs to be changed to a later date. This provides a more opportune time for hunters to hunt for moose and lessens the chance for spoilage in the field.

Carey Whitlatch  
Wasilla, Alaska

**Proposal 179**

I am in support of proposal 179. As an avid hunter and bow hunter of Alaska I agree that the current archery season in Unit 14A & B needs to be changed to a later date. This provides a more opportune time for hunters to hunt for moose and lessens the chance for spoilage in the field.

Carey Whitlatch  
Wasilla, Alaska

73

RECEIVED  
FEB 02 2009  
BOARDS

January 27, 2009

TO: Alaska Dept of Fish & Game  
Boards Support  
P. O. Box 115526  
Juneau, Ak 99811-5526

FROM: John Brodersen  
(Retired Alaska State F&G and Trooper)  
P. O. Box 229  
Skagway, Ak 99840  
907-983-2992  
E-mail: [jbtuss@aptalaska.net](mailto:jbtuss@aptalaska.net)

RE: White Phased Black Bears - I.e.. Glacier Bears

We have had two meetings in Skagway regarding the taking of white phased black bears. The main problem seems to be how to define a white phase.

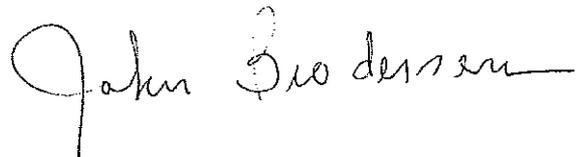
It seems to me that there is aa simple way to write a regulation which would not make it necessary to count the number of white hairs on a bear.

There are already regulation on the books with criteria covering the taking of moose with restrictions in antler size. If the hunter is in doubt, he should not shoot. The same model could be used for white phased black bears. If it is not black or cinnamon, hence, a glacier bear, the bear is to be protected.

As in the moose antler regulations, it leaves the decision up to the hunter and should be easily enforceable.

Thank you for your interest in our concern.

CC: John Warder  
P. O. Box 316  
Skagway, Ak 99840



Public Comment # 74



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TO: Alaska Board of Game Chair Cliff Judkins  
Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Alex Simon  
9873 Lone Wolf Drive  
Juneau, AK 99801

SUBJECT: Sport-Hunting in Alaska's National Preserves

DATE: February 3, 2009 05:40 PM

---

Dear Alaska Board of Game Chair Judkins,

When the Alaska Lands Act passed in 1980, Congress recognized that some lands destined for management by the National Park Service should remain open for sport hunting, so long as wildlife populations remained healthy. Unfortunately the State of Alaska's Intensive Management regime is in direct conflict with the policies of the National Park Service policy which says that NPS "does not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species (i.e., predator control), nor does the Service permit others to do so on lands managed by the National Park Service."

The impact of Intensive Management on parklands has caused a steady liberalization of season lengths and bag limits, the purpose of which was to increase hunter success for wolves and bears as a way to decrease their population and reduce predation on moose and caribou.

I support the following proposals before the Game of Board:

Proposal 51- season length and bag limit for brown bears in Lake Clark National Preserve

Proposal 64- season length and bag limit for wolves in Lake Clark, Katmai and Aniakchak national preserves

Proposal 67- bag limit for wolves in Lake Clark National Preserve

Proposal 77- season length and bag limit for brown bears in Wrangell-St. Elias National Preserve

Proposal 78- season length and bag limit for brown bears in Wrangell-St. Elias National Preserve

Proposal 112- bag limit for wolves in Wrangell-St. Elias National Preserve

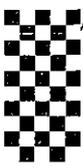
Proposal 174- season length and bag limit for brown bears in Denali National Preserve

Proposal 186- bag limit for wolves in Denali National Preserve

Only when these proposals are adopted will state hunting laws no longer be in conflict with Park Service regulations.

Thank you for the opportunity to comment.

Sincerely,  
Alex Simon  
9873 Lone Wolf Drive  
Juneau, AK 99801



RECEIVED  
JAN 30 2009  
BOARDS

1/30/09

**Proposal 97. Hunting Seasons and bag limits for moose.**  
**I DO NOT SUPPORT THIS PROPOSAL.**

Allowing residents to kill 36" bulls will not allow an animal to mature into an full grown animal. If someone wants a smaller moose then there is the spike/fork rule in place. I also do not believe a non-resident season should be implemented. This area is crowded enough and seems it would only benefit guides in the area contributing to the crowding and territory wars of guides "claiming" some of the more productive hunting locations.

**Proposals 6, 176 and 206.**  
**I SUPPORT THESE PROPOSALS.**

Proposal Hunting Seasons and bag limits for moose.

The current archery season from August 10 to 17 is one of my biggest wonders of the hunting regulations. I have been out archery hunting moose in 70 plus degree weather and have passed on an animal due to the heat and concern of wasting the meat due to not being able to get out of the woods in time. I believe more meat is lost this way than any wanton waste violations for items like rib cages and neck meat. It is extremely difficult to get within shooting distance of a legal animal during the warm summer months as well and rifle hunters have the luxury of hunting when moose respond to calls. I think that the archery season should be after the rifle season to allow archery hunters to have the same calling opportunities as rifle hunters.

**Matt Laskey**  
**Wasilla, AK**  
**907-357-1866**

Public Comment # 76

RECEIVED  
JAN 30 2009  
BOARD

To Whom it may concern,

I do not agree with brown bear hunting in Katmai National Preserve GMU9C (703). I can't think of a single thing that would make me feel this kind of bear hunting is of good, fair and honest sport. Please stop this bear hunting in Katmai, Alaska doesn't need any more bad press. I support the Spring 2009 Southcentral proposals 42-45.

Arthur Cherches  
4909 Cedar St.  
Bellaire, Texas 77401



RECEIVED  
JAN 30 2009  
BOARDS

To Alaska Board of Game Comments,

I would like to say that I strongly support proposals 42-45 in the Spring 2009 South central proposal book. Allowing the hunting of brown bears in this area of Katmai is absolutely egregious and should be stopped. Alaska is known for it's famous brown bear and there are plenty of areas where brown bears can be hunted, but only a few places where brown bears can be safely watched and photographed. The Katmai brown bear hunt controversy has garnered significant attention down here in Texas and even the avid Texas trophy hunters are against hunting brown bears that have been so habituated to humans that it's not much different than shooting cattle on a big Texas cattle farm.

Sincerely,



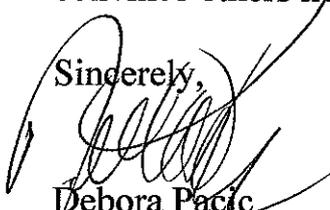
Shawn E. Jackson  
4705 Redstart St.  
Houston, Texas  
713 423-5106

RECEIVED  
JAN 22 2009  
BOARDS

Dear Alaska Game Board members,

I oppose brown bear hunting in Katmai National Preserve GMU 9C (703). I completely support the Spring 2009 Southcentral Proposals 42-45. If this kind of bear hunting is allowed to continue, I will no longer make trips to Alaska and try to convince others not to travel to Alaska.

Sincerely,



Debora Pacic  
P.O. Box 91  
Kalamazoo, Michigan 49004

**Scott, Ryan (DFG)**

---

**From:** Jan Wrentmore [madam@aptalaska.net]  
**Sent:** Thursday, January 15, 2009 3:42 PM  
**To:** Scott, Ryan (DFG)  
**Subject:** Alice Sorrell comments

Hi Ryan, my friend Alice Sorrell was unable to make the meeting in Skagway. However, she sent me her comments via email (see below) and asked me to read them into the record but there did not seem to be a good opportunity. May I submit them to you via email since it was an informal meeting? If not, I can fax them to you if you will send me your fax number. Thanks so much. Jan

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

**From:** alice  
**To:** Jan Wrentmore  
**Sent:** Saturday, January 10, 2009 3:47 PM  
**Subject:** HI JAN

This letter is the City of Skagway and the Department of Fish and Game. I am requesting that Jan Wrentmore read this for me or parts of it as she sees fit.

My name is Alice Sorrell. I live right near the bear's stomping grounds adjacent to AB Mountain trail. I would very much like to see our Glacier Bears which are becoming rare protected from the hunters at least in the Skagway area. If a hunter really wants to hunt these bear, I say to do it elsewhere and earn the kill. The bear in our area are quite friendly and because of this unless they become unfriendly or troublesome, they can only be murdered not hunted. Please protect these great bear which are becoming scarcer and scarcer.

After the terrible killing which happened last year to a precious little sprit bear, I ask for the lives of these bear to be spared. We are a tourist town and when taking people on tours seeing a bear makes their trip even more exhilarating. A spirit bear, or a glacier bear is a rare commodity and should be treasured for what is something very precious and rare. Please spare these bears and protect them by law so nothing like a killing of one of these bears can ever happen again. Not only our townspeople suffered over this kill but people from all over the world made note of the killing with disdain all over

the internet. We have plenty of black bear for the hunters to hunt for. Sparing the glacier bear will not hinder any hunting for those men who like to hunt. It is time we stood up and spoke for these defenseless creatures and appreciate the awe and wonder of the light colored bear or the glacier bear. I would like to see all Glacier bear or light colored bears protected but I am asking to at least protect it it here in Skagway area.

Thank you for your time and consideration.

Sincerely  
Alice V Sorrell

January 13, 2009

Alaska Department of Fish & Game  
Boards Support  
P.O. Box 115526  
Juneau, AK 99811-5526

To Whom It May Concern:

First, I would like to thank Ryan Scott for his patience and diligence in working with the Skagway community regarding the white bear issue. I know that it is not the practice of the Alaska Department of Fish & Game to protect one animal, but I am certain that many residents appreciate the time and effort put into this issue. I would like to take this opportunity to voice my opinion regarding Proposal 23 and try to argue some of the issues brought up by the advocates of this proposal.

I work for a cruise line and part of my job is deciding which tours we offer in Alaska and then market and sell those tours. I am also the president of a tourism board that represents members in Skagway, Haines and Whitehorse, so I would say that I am a good source on tourism in this region (although I am not representing either of these groups in this letter). The notion that preserving the white bears so that tourists can enjoy them is absurd. If Skagway were to market these white bears as a wildlife viewing opportunity, what would be the marketing slogan? "Journey across the Skagway river and look in a dumpster, you are certain to see a white bear rummaging through garbage." Unfortunately, Skagway is not a wildlife destination; it is a history and adventure destination. The tours that we do sell out of Skagway that promote wildlife viewing go to Haines.

I would also suggest that these bears are a threat to our tourists. Multiple tour venues on the North side of the bridge saw bears on their property on a regular basis – up to five at once. I agree that this is an Urban Bear issue that the city must take care of, but to promote wildlife viewing in our town is dangerous as we are such a confined community, situated between the mountain ranges. The wildlife that tourists do see around our town are protected either in the Park Service area of Dyea or up the pass and into Canada – two places hunting is not allowed. Also, I would be willing to bet that a tourist would be excited about seeing a bear regardless of the color of its fur.

I recognize that there is great value to wildlife viewing, but it is my opinion that if these white bears had not been Urban Bears, that the user group that is trying to protect them would probably have never seen them. They would have been out in the wild, where they belong, and only a

select few individuals who go tromping through the woods (mostly hunters) would have seen these bears. In that case this issue would never have been brought up in the first place.

It seems to me that by protecting this one bear, that the proponents of this proposal are in fact devaluing all other black bears. They are saying, "We want to see this white bear, we don't care about all other black bears, but we want to keep this one safe." Why are other black bears not important to them? It is my belief that advocates of this proposal wish to do away with hunting altogether in Skagway; that this is their way to continue to strip the hunters in the area of their rights. A few, select people in this town are very good at voicing their opinions about anti-hunting and anti-trapping practices. They are also very good at convincing other people, specifically seasonal employees and local students, of their same views.

I understand that the Skagway students want to see this unique bear, but should we really be teaching children that they should be able to get close to and see these wild creatures? Bears are not the cute and cuddly teddy bears that children grow up with. I would also suggest that a majority of parents would disagree with these students - stating that the bears have become a threat to their children and the community. These students don't see bears as a threat, this is demonstrated by their statement that there has never been a bear attack in Skagway; I say it only takes one.

I also believe that most hunters in Skagway would have been willing to compromise if Thor Henricksen had not been treated so poorly by the advocates of Proposal 23. Not only did he NOT break the law, but he was protecting his private property. Thor's name was dragged through the mud, not only in Skagway but in newspapers across the state. Advocates of Proposal 23 tried to do everything they could to discredit this innocent man, who did feel bad for the residents who had feelings for this bear. Again, Thor did nothing wrong, yet advocates of Proposal 23 have vilified him.

Hunters in this community are tired of being treated like criminals. We are doing nothing wrong. We are providing for our families and doing so in a recreational way that we enjoy. We understand that not everyone enjoys or understands this recreational activity, but not everyone likes kayaking or skiing either and those sports (or any other sport) are never threatened. Of course, sometimes hunters make mistakes, but none of us try to kill animals that are protected. I would suggest that hunters have more respect and a higher regard for animals than the wildlife viewers. We honor these animals, which are not only beautiful, but provide nutrition for our families. Hunters in the community only take what they will eat. We are not "Trophy Hunters," who would only kill an animal for its hide or antlers. We eat the meat, and yes, are proud of the beautiful creatures, thus preserving the hide and antlers for ourselves. Again, there is nothing wrong with that.

The hunters of this community are tired of compromising. We are the only ones continually being forced to give up anything. We don't ask hikers to give up their trails to hunters, we don't ask dog walkers to keep their dogs on a leash (although they should be) in our trapping areas. We don't ask people who enjoy other recreational activities to give up even part of what they enjoy so that we can hunt more. We are always the ones held responsible. And we are responsible. We have been a passive group in this community taking only what we need to feed our families and trying our best to stay out of the way of non-hunters. Skagway is classified as a subsistence community, however very little hunting and fishing exist and those that do are consistently being threatened, not only by activists against hunting but also the Park Service by restricting hunting and trapping. There is very little land left in the Skagway area where hunters can search for game.

A couple of years ago I shot a brown bear out in West Creek. I was very excited, it was the first bear I shot, and it was a great shot – 300 yards, right behind the front shoulder with a 30-06. I salvaged the meat and the hide. I decided to send the hide to Sitka Tribal Tannery to have it tanned, it has beautiful fur. I took it to Wings of Alaska to have it shipped to Juneau and then sent via GoldStreak to Sitka, as it needed to stay frozen. When I delivered it to Wings, I was asked what was in the box. When I told the agent it was a bear hide I was berated for killing this “poor defenseless creature.” Not only are bears not poor defenseless creatures, it is my right to provide food for my family. And it is my right to save the hide and treasure this animal.

This is only one very minor instance where hunters in this community are vilified, not for doing anything wrong but for enjoying a recreational activity that puts food on the table. People have forgotten that this is Alaska, and part of the reason that some of us live here is so that we can go hunting and provide healthy meat for our families. Being that my job is highly involved with the tourism community, including Jan Wrentmore and Tim Bourcy (two very powerful people), I many times hesitate to voice my opinion about hunting for fear of conflict or retribution. With this group of people you are not allowed to have an opinion that differs from theirs. They will find other reasons to condemn you in this community. Really, it is sad that this community has allowed a select few to dictate what all of us can and cannot do.

I believe the burden on the hunters to identify light-colored bears is unfair and unrealistic. This community, and in particular the advocates for Proposal 23, misidentified the bear that was shot last summer, which has caused all of this turmoil. How do you, and they, expect a hunter out in the field to be able to identify how “light” a bear is? The ADF&G regulations do not thoroughly identify glacier bears or white bears. How are we to protect ourselves from hefty fines, jail time and scrutiny by the community, if those regulations are not clear? If Proposal 23 is passed, it is the hunter who is threatened by consequences if he/she makes a mistake. If this white bear is shot, accidentally or on purpose, it is the hunter who pays the consequences, not the wildlife

viewers. There are no consequences for the wildlife viewers in any way, even if their “protected bear” threatens or attacks a human being.

One could argue that the community already voiced their opinion that they wanted to protect the white bears in a proposal supported by the city council. However, I would like to point out that that proposal was introduced in the summer when most of us hunters (the working class) were working 80+ hours per week and obviously out of touch with what was being proposed to the council. Or perhaps, at that time we were willing to compromise. Yes, shame on us for not speaking up then. Had we realized that this would have become such a great ordeal and that a life-long resident would be harassed so mercilessly then perhaps we would have spoken up earlier. This is our wake-up call to get more involved and stay informed.

I believe the regulation for black bear hunting in unit 1D should continue to be written as:

Residents & Nonresidents: September 1 – June 30

- Resident Bag Limit: Two bears; only one of which may be a blue or glacier bear.
- Nonresidents Bag Limit: One bear

Perhaps the compromise could be that we keep the language for Units 1C and 1D that protect the white-colored black bears. A regulation that is unenforceable because there are not white bears in Skagway, yet voices the opinion of some people in the community that want to protect “Spirit Bears.” I would rather this language be eliminated; however, if a compromise needs to be reached I believe this is the only fair solution. I thank you for taking the time to consider all of the many proposals and letters that come to your office. I realize that this is a difficult decision to be facing, but again thank you for your time to listen to all of our opinions.

Sincerely,

Jennifer Schlatter  
P.O. Box 1283  
Skagway, AK 99840  
907-612-0412 phone  
907-983-2685 fax  
jasfly@hotmail.com

**Scott, Ryan (DFG)**

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**From:** Darren Belisle [mailto:jt1bucks@aptalaska.net]

**Sent:** Thursday, January 22, 2009 11:42 AM

**To:** Scott, Ryan (DFG)

**Subject:** board of game proposal #23

Ryan can you get this to the board of game for me. Thank you very much.

You can reach me at this e-mail for any archery comments also.

Darren Belisle

I feel that the Board of Game should use a do not adopt approach to this proposal. It is not hunting that is detrimental to the population of off colored black bears. I feel the #1 cause to the decline (if there is any decline, as we have no idea to the numbers of "glacial colored bears" in the Skagway area) is the human garbage production and the feeding of such bears, which means they will ultimately have to be destroyed at a cost to the taxpayers. I feel if the people of Skagway focus their attention on cleaning up the easy food and stop feeding the bears they would move back to the mountains and the problem goes away. It seems that a single mother bear is producing the off colored cubs and she is a garbage bear and teaching her cubs to be a garbage bears.

Thank you for your time on this matter

Darren Belisle  
Skagway Alaska  
907-983-2336

**Scott, Ryan (DFG)**

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**From:** Mark Schaefer [MSchaefer@whitepass.net]  
**Sent:** Monday, January 19, 2009 4:14 PM  
**To:** Scott, Ryan (DFG)  
**Subject:** comments for Board of Game regarding white colored bears

Dear Ryan Scott,

My opinions regarding the white colored bear regulations. Please forward to the Board of Game.

The regulation should be returned to as it was before changing to protect white colored black bears.

The Board of game made a mistake in their changing the past regulation to protect the white colored black bear. The legal advise was clear that the regulation protecting the white colored black bear would be difficult if not impossible to enforce and the fact remains that it was in fact unenforceable. The board of Game chose not to listen to the legal advise given.

The local Upper Lynn Canal Board of Game Advisory committee opposed proposal #23, looks like the board ignored this advise.

The changing of the regulation making it more restrictive to include "Glacier" color phase bears is unacceptable to the hunter, including this color phase to "Protect" a specific bear that probably no longer exists is unfair, and just like the white color phase bear regulation is unenforceable. As was admitted in the meeting coloring can be interpreted. What is a "Glacier bear" it is a black bear.

The Board of Game has helped to created and facilitated our local "garbage bear" problem in Skagway by protecting the white colored phased bear and allowing a fervor over the subject, and has encouraged the misconception that bears belong in the community. While the Board of game did not tell people to feed these bears that is in my opinion what has been happening, people feeding bears, directly and indirectly. The people that believe these bears need protection also think that these bears belong in the community. Bears do not belong in this community, they belong in their natural habitats other than among people. The only reason they come into the community and stayed as problem bears is because they are garbage bears and have been encouraged by feeding and will continue to stay.

The Board of Game has not adequately considered the adverse affects, like possibly focusing even more hunt pressure on the region, both legal and illegal, by discontent persons or other unfit acts by disgruntled persons as was mentioned in the local Skagway meeting. Or the divisions created between persons in the community by focusing on this change to regulation, if this had been left alone we would be far better off, as the problem was not solved by creating a regulation for the white colored bear it was the bears demise.

Mark Schaefer p.o. box 297 Skagway Ak. 99840

**Scott, Ryan (DFG)**

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**From:** Denise Caposey [dcaposey@skagwayschool.org]  
**Sent:** Saturday, January 24, 2009 12:49 PM  
**To:** Scott, Ryan (DFG)  
**Subject:** Glacier bear/skagway  
**Attachments:** Reflections of a Skagway Valley resident January 10.doc

Hi Ryan. Thank you for your excellent facilitation of the meeting at the AB Hall in Skagway, January 10th. I am attaching my comments that I have submitted to our local paper concerning the issue of the glacier bears in our area. Please help me to submit these comments to the proper forum(s) in your Department so that I may go on record in support of protecting glacier bears.

Thank you,  
Denise Caposey  
Skagway

After attending a public meeting tonight in the AB Hall, I came home to reflect upon the issues raised at the meeting. In attendance were many concerned citizens- among them several students of Skagway School. It is for them that I write this.-

This particular black bear sow is the problem bear in question as she is the producer of the glacier bears. She has bore these wonderful glacier bear cubs in her last two litters and may continue to produce these rare bears in the future. For long time Skagway residents in the know, that is indeed a rare occurrence.

Allocating protection of this rare creature, herein referred to as a *glacier bear*, is recognizing that a specific, genetically rare occurring bear *is* different than other black bears in the area. It places value on this bear that his brothers and sisters do not enjoy.

That said, the cubs of this particular sow are being taught by their mother how to hunt in dumpsters. Mama Bear has passed this habit on to at least two generations of cubs.

This means the current bear family with the glacier bear would have to be relocated. Left alone, this sow will continue to threaten property and teach her cubs to do so also. As everyone knows, it is difficult to change the behavior of a food-conditioned bear. Perhaps a zoo is the best placement for this particular bear family.

The bears will continue to be a problem as long as they can obtain easy meals from garbage containers and gardens in town. Eliminating the bear problem in town by addressing the garbage issue should be the focus and direction of the municipality.

Eliminate the attractants and you will have eliminated the bears' desire to come on your property. This is simple bear

country knowledge. If you really want to protect the bears, do something about the garbage in town.

None of us are being asked to stand by and allow our life or property to be threatened by a bear and her family, regardless of what color they are. DOL laws\* already exist.

What is being asked of us is to consider protecting the future *glacier bears* in this area. That is what the regulatory language of ADFG Proposal 23 should focus on. Will we allow this type of black bear the protection they have under current regulations in other areas of the state?

\*DOL law states you have the right to defend your life and your property when threatened by a wild animal.

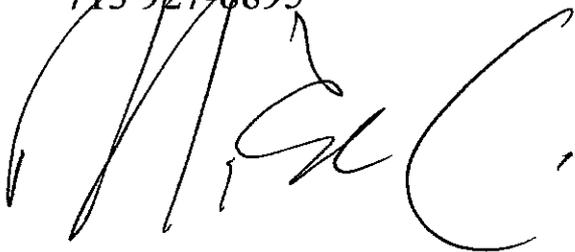
Is it asking too much? In my opinion, we need to look beyond today and toward the greater common good. Do you have an awareness of nature that encompasses the

desire to protect that which is rare and therefore in need of protection? Being mindful that this does not take away your right to protect yourself, your family, or your property under existing DOL law.

RECEIVED  
JAN 26 2009  
BOARDS

End the Katmai brown bear hunting. There are many other places to hunt bears in Alaska other than Katmai. This is the most disgusting kind of hunting I've ever heard of and I'm not opposed to hunting at all. I support the Spring 2009 South central proposals 42-45.

Mike Cherches  
4909 Cedar St.  
Bellaire, Texas 77401  
713 927-8895

A handwritten signature in black ink, appearing to read 'Mike Cherches', written in a cursive style.

RECEIVED  
JAN 26 2009  
BOARDS

Dear Sirs,

Please stop the brown bear hunting in Katmai. These bears are habituated to humans and are being shot in an extremely unfair manor. I strongly **SUPPORT the Spring 2009 Southcentral Proposals 42-45.**

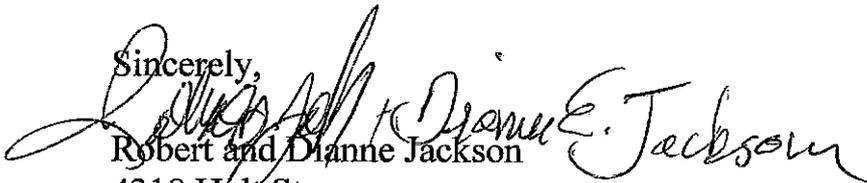
Sheri Rose *Sheri Rose*  
3521 Kenbrooke Ct.  
Kalamazoo, Michigan 49006

RECEIVED  
JAN 26 2009  
BOARDS

To whom it may concern,

We strongly support Alaska Game Proposals 42-45. Our family has traveled to Alaska two to three times per/year over the last ten years and all of that travel centers around spending time with the brown bears on Katmai National preserve. We feel and have observed that opening up the Moraine Creek and Funnel Creek areas of GMU 9C (703) to brown bear hunting has had a tremendous negative impact on the brown bear populations especially the large adult males. This has unequivocally decreased our enjoyment of the Alaska experience. Brown bear hunting in Katmai National Preserve has become a very discussed and unpopular topic, even amongst trophy hunters in the lower 48 since the Daniel Zatz video was published on YouTube. Hunting this population of bears which have been in close proximity to humans all summer long is simple egregious, unethical and falls way short of fair chase hunting. In these troubling economic times with oil prices steadily dropping and millions losing their jobs, it would be in Alaska's best interest to protect the hundreds or thousands of potential vacationer revenue to Alaska by preserving the brown bears in this region rather than allow a couple outfitters and a hand full of hunters to kill them. I can attest that many potential travelers to Alaska will be discouraged from spending their scarce or limited vacation dollars if this brown bear hunt continues.

Sincerely,



Robert and Dianne Jackson

4318 Holt St.

Bellaire, Texas 77401

713 661-8569

January 15, 2008

Alaska Department of Fish and Game  
Chairperson Cliff Judkins  
Boards Support Section  
P. O. Box 115526  
Juneau, AK 99811-5526

Alaska Fish and Game Board Members:

Thank you for taking time to read the comments that we have here in Skagway concerning the white-phased bear. In Proposal 224, there are three major issues that are of concern.

The proposal is mostly hype and lacks facts to support it. The total number of summer visitors to Skagway is not one million, it is actually less than 875,000. There is only one eco tour company that wants the proposal. As for the kids of our community, there was only one young lady who was very much into drama and debate that didn't represent the school, only herself.

There is no such thing as a specific color for a spirit bear. A spirit bear is the form taken as he enters the afterlife. The small group of people trying to get this proposal passed doesn't represent everyone in this community. I personally find it in bad taste as a long-time Alaskan to promote feeding bears as part of a tour. I do agree that all little bear cubs are cute.

The first concern is public safety. The bear in question was one of three cubs that has been using town dumpsters as part of their food source. The sow has been a problem bear for 3 years. The bears were here until late October because of the dumpster problems (not being bear proof). The second part is that the sow has created a second generation of problem bears now. It is documented that the police had to help one of the cubs out of a dumpster. He got up on the sow's back and fell into the dumpster. What if a child or even an adult had taken out the garbage and got between the cub and the sow? Increasing bear populations this close to town would be a mistake that could get someone hurt. Our pets are also at risk here. It has been only 10 years ago that Haines had an older sow with no teeth that ate over a dozen dogs before they got her under control.

The second concern is enforcement. How would you determine if the bear is one-third, one-half or three-quarters white? This is far too subjective to enforce. If the bear has to be mostly black or dark brown what criteria would be used to make the determination as to whether the bear would be considered a protected white-phased bear or not.

The third concern is Federal Subsistence. There are four families that use black bear as part of their food source. In Skagway a small Alaska Native community also uses bear as part of their diet and for their artwork.

Alaska Fish and Game Board Members  
Proposal 224

January 17, 2009  
Page 2

The last point I would like to make is that this white-phased bear has split our community to the point where a death threat has been made to the person that shot the bear to protect his property! Just as disconcerting, his daughter has been the target of harassment by another student at school over this same issue. There is no animal worth this type of behavior, the hate needs to go away! Proposal 224 needs to go away!

I recommend no action be taken on the white-phased bear proposal. The regulations that were in place have been working just fine for the past 35 plus years.

Thank you,

Capt. Larry D. Pierce  
P. O. Box 1336  
Skagway, Alaska 99840-1336  
(907) 983-3400  
Upper Lynn Canal Advisory Committee/Skagway Representative  
2007 till present (24 year resident)

Public Comment # 88

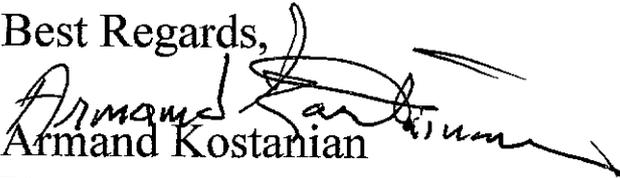
RECEIVED  
JAN 21 2009  
BO--

To Whom it may concern at the Alaska Dept. Of Fish and Game,

Last year I traveled to Alaska and my primary reason was to take several trips out to the grizzly bears on Katmai. I was horrified to hear they were being hunted and in such a disgusting way. On several trips out to Katmai, I did not see one big adult male and I thought this was a bit strange, but then it was mentioned that they were being killed off by the hunters. Brown bear hunting in Katmai National Preserve should NOT be allowed.

I one hundred percent support Proposals 42-45 in the Spring 2009 Southcentral Proposal book.

Best Regards,

  
Armand Kostanian

Houston, Texas

713 291-1594

John Tronrud  
Box 41  
Skagway, Alaska 99840  
January 14, 2009

Alaska Board of Game  
Alaska Department of Fish and Game  
P.O. Box 115526  
Juneau, AK 99811-5526

Dear Members:

Having attended the meetings in Skagway about Proposal 224. I would like to present you with some of the problems with that proposal and I request that the Alaska Department of Fish and Game remove the restriction of taking of white-phased black bears, from the hunting regulations.

Coloration of black bears is not uncommon, many colors and even patterns exist. Proposal 224 has been deferred before and the biggest problem is enforceable language of color or percentage of color. I have heard the Department of Law has been involved in this. White or/light-phase should be removed or clarified to refer to albino bears.

Not only does a percentage of color make it difficult to enforce it would create hardships for identification and possible mistakes by hunters. This proposal was crafted to protect an animal which was in close proximity to town. People had admitted to feeding it, as well as it had visited gardens and refuse, not a healthy situation.

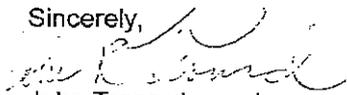
The term "spirit bear" is incorrect terminology, as I understand it. These odd colored bears are a "glacier bear" or even "Kermode", referring to bears on Princess Royal Island, British Columbia. In my research, the term "spirit bear" does not refer to coloration in native lore and use of the term creates unnecessary emotion. Taking of bears named as such have/will cause personal confrontations and accusations even when taken in protection of life or property.

While I do not hunt black bear and I do enjoy viewing and photographing wildlife, most visitors and residents don't care what color an animal is, their desire it to be able to see any type of wildlife! I believe this proposal's purpose is to swing the balance of black bear colorization in unit 1D. Local tour operators would then have an advantage in offering something different to the crowded market, that other areas could not offer.

If this proposal was to protect an "albino", I would be in support, as it would be much easier to identify and the rarity of such an animal would be justifiable. Any language written in the future for animal protection should be written to cover statewide.

The other solution to consider in Proposal 224, is flawed as well. How dark is very dark brown? Could a black or very dark colored bear with a white patch on its chest be taken? Long term, would not then black or very dark brown bears become unusual? More questions for the Department of Law to answer.

At minimum, the Board of Game should take "no action" on Proposal 224. Ideally, white or/ light phase should be removed or clarified to deal with albino animals, not the normal population of wildlife. Thank you for your consideration.

Sincerely,  
  
John Tronrud, member  
Upper Lynn Canal Advisory Board

RECEIVED TIME JAN. 15. 10:25AM

Public Comment # 90

3778 West 13<sup>th</sup> Avenue  
Vancouver, British Columbia  
Canada V6R 2S6  
November 26, 2008

RECEIVED

2008

Mr. Cliff Judkins  
Chair  
Board of Game  
Alaska Department of Fish and Game/Boards Support  
P.O. Box 115526  
Juneau, AK 99811-5526  
USA

Dear Mr. Judkins and all members of the Board:

For a long time now, I have dreamed of going to Katmai National Park to see and photograph the grizzlies there. I know from others who have been there that it is a wild and beautiful place with unparalleled opportunities to experience bears at close range undisturbed in their natural habitat. This extraordinary situation is possible because the bears there have become habituated to people who come to quietly watch them, photograph them and do them no harm.

But now I hear that the idyllic of this place is being shattered by gunfire, that Katmai National Preserve, Alaska GMU 9C has recently been opened to trophy hunting.

This "hunt" has been documented and videotaped, showing "hunters" walking to within 20 feet of a habituated bear and blowing it away. What a betrayal of that bear's trust!

That is not hunting; that is just killing.

I had been planning to visit Katmai next fall. But I cannot in good conscience spend my tourist dollar in a state that allows such an egregious and unethical betrayal of its wildlife. My dream of Katmai has turned into a nightmare for the bears – and for all the bear viewers who come and get to know the grizzlies there.

Therefore, I urge you in the strongest of possible terms to stop the grizzly bear hunt in Katmai National Preserve, Alaska GMU 9C. Please respond and inform me of what steps you intend to take in this regard.

Sincerely,



Roberta Olenick, M.Sc.

RECEIVED

NOV 21 2008

ON NOVEMBER 8, 2008 MY LEAD DOG WAS <sup>BLE</sup>KILLED  
IN A TRAP WHILE PULLING ME ON A 15 FOOT TOWLINE ALONG  
SNAKE LAKE ROAD NEAR DILLINGHAM. ENCLOSED IS A COPY  
OF THE ARTICLE I HAVE WRITTEN AND SUBMITTED FOR POS-  
SIBLE PUBLICATION IN 'ALASKA MAGAZINE'. PLEASE PASS THIS  
ALONG TO ALL THE BOARD MEMBERS FOR THEM TO CONSIDER  
THE CHANGES IN TRAPPING REGULATIONS I HAVE PROPOSED.  
I AM AVAILABLE, SHOULD YOU HAVE ANY QUESTIONS, AS EX-  
PLAINED WITHIN.

EXPECTANTLY YOURS,



RICHARD LUZITANO

Public Comment #

92

RICHARD LUZITANO  
P.O. BOX 1466  
DILLINGHAM, AK. 99576

842-2646  
THURSDAYS 4:00P.M.-5:30P.M.

11-12-08

I AM, AND HAVE BEEN FOR ALMOST 8 WINTERS, A LODGE CARETAKER AT NUNAVUAGLUK LAKE (LOCALLY CALLED SNAKE LAKE) NEAR DILLINGHAM IN BASTOL BAY. THE LODGE, ORIGINALLY A FISH HATCHERY, WAS FORMERLY CALLED 'CRYSTAL CREEK LODGE' (YOU FEATURED AN ARTICLE ON A LODGE WITH THIS NAME [SAME OPERATOR] IN THE AUGUST 2007 ISSUE) BUT HAS SINCE \* REVERTED TO ITS ORIGINAL NAME 'EAST CREEK HATCHERY'. THREE SUMMERS AGO THE OPERATOR PURCHASED HIS OWN LODGE NEAR KING SALMON AND TOOK THE NAME WITH HIM. SINCE THAT TIME I HAVE LIVED HERE YEAR-ROUND. THE LODGE IS OWNED BY 'CHOGGIONE LIMITED', A LOCAL NATIVE CORPORATION.

I WOULD LIKE TO SUBMIT THE FOLLOWING ARTICLE FOR PUBLICATION IN 'ALASKA MAGAZINE'. AS A CARETAKER AT A REMOTE RESORT IT'S DIFFICULT FOR ME TO COMMUNICATE WITH THE OUTSIDE. THERE IS A 9 MILE NON-MAINTAINED STATE ROAD (SNAKE LAKE ROAD) WHICH CONNECTS THE LODGE TO DILLINGHAM BY WAY OF ALEKNAGIK LAKE ROAD. IN THE WINTER SNAKE LAKE ROAD IS ONLY PASSABLE BY SNOWMO, SKIS, OR SHOWSHOES. I DO HAVE A 'BETRS' PHONE. THIS IS A RADIO PHONE THAT PROVIDES INTERMITTENT SERVICE AT BEST. IN ORDER TO RECEIVE OUTSIDE CALLS I POWER-UP THE PHONE WITH A SMALL GENERATOR ON THURSDAYS FROM 4:00 P.M. TO 5:30 P.M. THE NUMBER IS 842-2646. IF ONE CAN PUT-UP WITH THE STATIC, FADGE-OUT, AND FREQUENTLY MAXED-OUT SYSTEM (ONLY 8 CALLS AT A TIME) ONE CAN WITH PATIENCE COMMUNICATE. SOMETIMES THE PHONE WORKS QUITE WELL. I GENERALLY ARRANGE FOR A NEARBY MAIL DROP IN JANUARY AND MARCH, BUT WOULD GREATLY APPRECIATE HEARING FROM YOU BY PHONE.

IF THIS ARTICLE IS ACCEPTED, IN LIEU OF PAYMENT PLEASE SEND A COPY OF THE MAGAZINE FEATURING IT TO THE FOLLOWING: 

## ADDENDUM

THE FOLLOWING THURSDAY AFTER I HAD COMPLETED THIS ARTICLE, I RECEIVED A PHONE CALL. THE VOICE ON THE PHONE TOLD ME HE WAS THE TRAPPER WHO HAD TRAPPED MY DOG. HE SOUNDED SINCERE WHEN HE APOLOGIZED AND TOLD ME ALL HIS TRAPS ALONG THE ROAD HAD BEEN REMOVED. HE SAID HE WAS RELATIVELY NEW TO THE AREA AND DIDN'T KNOW ANYONE LIVES HERE OR RAN DOGS ALONG THE ROAD. ALL MY QUESTIONS WERE FREELY ANSWERED, BUT HE ASKED ME TO NOT USE HIS NAME IN THIS ARTICLE. THE TRAPPER STATED HE HAD MISREAD THE TRAPPING REGULATIONS AND THOUGHT THE FULL SEASON OPENED NOVEMBER 1. HE ASKED ME IF I COULD FORGIVE HIM. I HAD SHOWED LAST WEEK, POSSIBLY OBSCURING THE TRACKS FROM OUR RUNS. I TOLD HIM YES.

THIS PERSON HAS BEEN CHARGED WITH TRAPPING OUT OF SEASON.

## THE DEATH OF A NOT-VERY-GOOD SNAKE DOG

I HOPE TO ACCOMPLISH 3 THINGS FROM THIS ARTICLE, INCREASE PUBLIC AWARENESS OF THE DANGERS OF CLOSE SET TRAPS AND SNARES, CHANGE STATE TRAPPING REGULATIONS TO MINIMIZE ALL TRAPS AND SNARES HAVE OWNER IDENTIFICATION AND ARE PROHIBITED FROM BEING SET WITHIN A REASONABLE DISTANCE FROM PUBLIC ROADS AND TRAILS, AND TELL THE TALE OF AN EXTRAORDINARY DOG.

I FIRST MET TANNER TOWNERS THE ENA OF JANUARY 2007. I AWOKE ONE MORNING TO FIND HIM ON THE PORCH OF THE EMPTY CABIN ACROSS FROM ME. A VERY LARGE MAPLE YELLOW LAB, HE WAS EXTREMELY EMACIATED WITH A WOLF SNARE DEEPLY EMBEDDED AROUND HIS FLANKS AND A LARGE PENETRATING WOUND ON HIS HIP. SHORTLY AFTER REMOVING THE SNARE HIS SKIN RETRACTED FROM THE SITE EXPOSING THE UNDERLYING MUSCLE. AT FIRST I THOUGHT THE MOST HUMANE THING TO DO WAS PUT HIM DOWN, BUT HE HAD A TERRIFIC APPETITE AND ACTED AS THOUGH HE WERE UNINJURED. I CONTACTED AN ANCHORAGE AREA VETERINARIAN\* WHO ASSURED ME THE DOG WOULD SURVIVE HIS INJURIES AND PROMPTLY SENT ME MEDICINE. TANNER QUICKLY GAINED WEIGHT AND CONTINUED TO ACT AS IF HE WERE UNINJURED. IT TOOK 4 MONTHS FOR THE SKIN TO COMPLETELY GROW BACK OVER THE MUSCLE.

IT WAS A MIRACLE TO ME THAT TANNER AVOIDED HAVING THE SNARE TIGHTEN AROUND HIS NECK, WAS ABLE TO FREE HIMSELF, AND FIND HIS WAY TO ME, THE ONLY RESIDENT WITHIN AT LEAST 10 MILES. I HAVE THREE DOGS BURIED HERE ALONG SNAKE LAKE ROAD WHO DIED OVER THE YEARS FROM OLD AGE. IT WAS LIKE THEIR BODIES WERE SEEDS THAT SPROUTED AND TANNER WAS THE RESULT. THOUGH I KNOW HE YEARNED FOR THE FREEDOM TO ROAM I KEPT

\* I CONTACTED THIS VETERINARIAN ASKING PERMISSION TO USE HIS NAME. HE SAID HE COULDN'T DO SO WITHOUT READING AND APPROVING THE ENTIRE ARTICLE, HE HIMSELF IS A TANNER, BEING IN A HURRY TO GET THIS ARTICLE OUT I HAVE DELETED HIS NAME.

HIM AND MY OTHER DOG, A FEMALE HUSKY MIX NAMED TOLIK, STAKED OUT AND WATCHED THEM ON A LEAD TELLING MYSELF I WAS KEEPING THEM SAFE.

BEING A LAB, TANNER WAS ALL NOSE AND WANTED TO INVESTIGATE EVERY SCENT AND OBJECT HE CAME ACROSS. WHATEVER WE CAME UPON A G-ROUSE WHILE WALKING THE ROAD IN THE SUMMER I WOULD LEAVE DRAG MARKS IN THE DIRT FROM HIM PULLING ME WITH MY HEELS DUG IN. TANNER WAS A POOR CANDIDATE FOR A SLED DOG, BUT SKIING IS MY GREATEST LOVE. I HAVE BEEN SKIING WITH DOGS, AND ONCE COMPETITIVELY WITH A HORSE, FOR ALMOST 30 YEARS.

I STARTED PUTTING TANNER IN HARNESS LAST WINTER, AT FIRST I USED HIM AS MY WHEEL DOG SINCE MY HUSKY WAS GOOD AT KEEPING THE LINE TIGHT. AT TIMES THIS DIDN'T WORK VERY WELL BECAUSE HE WOULD HEAD OFF TRAIL AND WITH HIS MASSIVE SIZE AND STRENGTH PULL THE OTHER DOG SIDEWAYS. WHEN I GAVE TANNER THE LEAD DOG POSITION THINGS IMPROVED. HE STILL OCCASIONALLY WANTED TO FOLLOW HIS NOSE OFF TRAIL, BUT WHEN EVER WE WERE PASSED BY A VEHICLE HEARING IN OUR DIRECTION HE WOULD PICK UP THE PACE AND WE WOULD RAPIDLY COVER THE NEXT FEW MILES. I FIGURED IF I COULD KEEP A SNOWBO IN FRONT OF US I WOULD HAVE A WORLD CLASS TEAM.

THIS SUMMER I ORDERED A NEW XXXLG. RACING HARNESS AND BOOTIES FOR TANNER. SINCE ABOUT THE MIDDLE OF OCTOBER, WHEN THERE WAS BARELY ENOUGH SNOW TO COVER THE ROAD, WE'VE BEEN OUT EVERY DAY COVERING AT LEAST 8 MILES. I STILL OCCASIONALLY HAD TO CHASE TANNER FORWARDING TO FOLLOW HIS NOSE, BUT THINGS WERE IMPROVING AND WE WERE GETTING FASTER. I WAS REALLY LOOKING FORWARD TO MORE SNOW SO WE COULD COVER LONGER DISTANCES AND GET OFF THE ROAD.

ON SATURDAY NOVEMBER 8, 2008, THE DAY BEFORE MY BIRTHDAY, MY WORLD FELL APART. STILL 2 MILES FROM RETURNING TO THE CABIN TANNER DARTED OUT ABOUT A FOOT FROM THE

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ROAD TO STICK HIS HEAD IN A SMALL CULVERT. HE QUICKLY BACKED OUT WITH A MUFFLED WHINE AND I AT FIRST THOUGHT HE HAD AN ANGRY MINK BITING DOWN ON THE END OF HIS NOSE. IN REALITY IT WAS A CONABEAR 330 TRAP COMPLETELY ENCLOSED HIS HEAD. TULIK RAN IN TO HELP AND I FRANTICALLY SHED SKIS TO FOLLOW THE 15 FOOT TOWLINE TO HIM. TAM-HER QUICKLY BECAME STILL, BUT NEVER HAVING SEEN A TRAP BEFORE I WAS AT FIRST UNABLE TO EVEN BUZZE IT OPEN. THE SUN HAD JUST SET AND THE INCREASING DARKNESS ALONG WITH AN ONCOMING STORM MADE IT EVEN MORE DIFFICULT. I FINALLY FIGURED OUT HOW TO OPEN THE TRAP, BUT WITH ALL MY STRENGTH AND THE TIGHT AREA TO WORK IN I COULDN'T QUITE OPEN ONE SIDE ENOUGH TO SECURE IT TO BE ABLE TO OPEN THE OTHER SIDE. BY THIS TIME BLOOD WAS OZZING OUT OF TAMHER'S MOUTH AND NOSE AND HIS EYES WERE GLAZING OVER. WITH A FINAL SCREAM AND RUSH OF ADRENALIN I OPENED AND SECURED ONE SIDE, THEN THE OTHER AND REMOVED THE TRAP FROM HIS HEAD, BUT HE WAS GONE. MY BEAUTIFUL, SCARRED YELLOW LAB LYING THERE IN HIS NEW BLACK HARNESS STILL TIED TO ME BY THE TOWLINE. HE LOOKED LIKE HE COULD HAVE BEEN SLEEPING EXCEPT FOR THE BLOOD AND HIS OPEN SIGHTLESS EYES.

I CONTACTED ALASKA WILDLIFE TROOPER JUSTIN ROGERS WHO SNOWGEOG OUT TO INVESTIGATE THE FOLLOWING TUESDAY PRIOR TO HIS ARRIVAL THE TRAP HAD BEEN RESET. TROOPER ROGERS INFORMED ME THAT BY STATE LAW IF THE TRAP WERE SET FOR BEAVER BY A LICENSED TRAPPER IT WAS A LEGAL SET AS BEAVER HAD BEEN IN SEASON SINCE OCTOBER 10. FORTUNABLY, THE TRAPPING SEASON FOR ALL LEGALLY TRAPABLE GAME STARTED NOVEMBER 10 AND BAITED TRAPS COULD NOW LEGALLY BE PLACED ANYWHERE ALONG THE ROAD. TROOPER ROGERS WAS VERY SYMPATHETIC AND EXPLAINED HE HIMSELF WAS A TRAPPER. MY HOPE IS THAT THE TRAPPER WHO KILLED MY DOG WAS YOUNG, INEXPERIENCED, AND VERY, VERY NAIVE. I CAN BELIEVE PEOPLE CAN BE THAT NAIVE. I ONCE ASSISTED A YOUNG OUT OF

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STATE AIR FORCE WOMAN WHO HAD JUST TOTALED HER CAR HITTING A MOOSE. SHE TOLD ME SHE THOUGHT THE MOOSE WOULD MOVE OUT OF THE WAY. I DON'T THINK SHE EVEN SLOWED DOWN. IF THIS TRAPPER WERE TO APPROACH ME WITH REGRET FOR HAVING KILLED MY DOG AND PROMISE TO NEVER AGAIN TRAP CLOSE TO PUBLIC ROADS OR TRAILS I COULD FORGIVE HIM. UNFORTUNATELY I AMY NEVER KNOW WHO THE TRAPPER IS SINCE TRAPS AREN'T REQUIRED TO HAVE OWNER IDENTIFICATION.

I FEEL I HAVE TO TURN THIS TRAGIC EVENT INTO SOMETHING POSITIVE. WE NEED STATE LAW TO REQUIRE TRAPPING NOT BE ALLOWED WITHIN A REASONABLE DISTANCE OF PUBLIC ROADS AND TRAILS, AND REQUIRE ALL TRAPS AND SNARES HAVE OWNER IDENTIFICATION. I HOPE THIS TRAGEDY WILL HELP PREVENT ANOTHER PET, OR CHILD, FROM BEING INJURED OR KILLED IN A TRAP.

TRAPPING IS AN OLD AND HONORABLE PROFESSION IN ALASKA. I BELIEVE MOST TRAPPERS ARE HIGHLY ETHICAL. I KNOW A FEW. THE INCREASING PUBLIC SCORN TOWARDS TRAPPING IS MOSTLY RESULTANT FROM THE FEW UNETHICAL TRAPPERS. I CHALLENGE ALL TRAPPING ORGANIZATIONS TO PUSH FOR PASSAGE OF THE REGULATIONS I HAVE PROPOSED AND IMPROVE THE IMAGE OF TRAPPING IN THE PUBLIC EYE. I CHALLENGE ALL TRAPPERS TO POLICE THEIR OWN RANKS AND WEED OUT THE UNETHICAL AMONGST THEM. I WOULD HOPE TO HAVE THE SUPPORT OF DOG MUSHERS AND ALL OUTDOOR ENTHUSIASTS.

I COULDN'T BURY TAMMER SINCE THE GROUND WAS FROZEN AND COVERED WITH A FOOT OF SNOW. I TOOK HIM OUT ABOUT 5 MILES AND PLACED HIM UNDER A TREE. HE LOOKED LIKE HE WAS JUST SLEEPING. SOME SEEDS WILL SPROUT OUT TOP OF THE GROUND.



# Audubon ALASKA

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Tel: 907-276-7034  
Fax: 907-276-5069  
www.audubonalaska.org

February 13, 2009

Alaska Board of Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

FAX: 907-465-6094

Dear Board Members:

On behalf of Audubon Alaska, I would like to offer our perspectives and recommendations on several brown bear proposals before the Alaska Board of Game specifically related to brown bears on the Kenai Peninsula. Audubon Alaska is a science-based conservation organization dedicated to the conservation of Alaska's ecosystems, focusing on birds, other wildlife, and their habitats for the benefit and enjoyment of current and future generations. Audubon has about 2,300 members and supporters in Alaska with chapters located in Anchorage, Cordova, Fairbanks, Juneau, and Kodiak. Audubon Alaska also participated in the Kenai Brown Bear Stakeholder Group and participated in the development of the Kenai Brown Bear Conservation Strategy.

Audubon Alaska opposes Board of Game proposals 126 through 141 related to liberalizing seasons and bag limits and methods and means for brown bear harvests in Game Management Units 7 & 15 on the Kenai Peninsula.

The Kenai Peninsula population of brown bears represents a small, isolated population with very limited immigration to the peninsula from mainland Alaska. Small, isolated populations are highly vulnerable to extirpation. We know that the Defense of Life or Property (DLP) mortality on the Kenai has increased significantly over the past two decades. Last year, the human-caused mortality of brown bears exceeded 40 animals. The Alaska Department of Fish and Game does not currently have a science-based estimate of the Kenai population. However, biologists recognize that it is relatively small (likely less than 300-400 bears) and that the recent level of mortality is unlikely to be sustainable over the long term. For example, 40 bears out of a population of 400 represent a "known" mortality of 10% which is higher than most bear biologists consider sustainable. We also have no knowledge of the unreported kill for this population. Without substantial immigration from outside the peninsula, mortality levels that occurred in 2008 clearly cannot be sustained over time. The circumstances on the Kenai, including a small, isolated population with expanding human activities resulting in increased bear mortality, are why the population was previously listed as a Population of Special Concern by the Commissioner of the Alaska Department of Fish and Game. Audubon strongly objects to removing this special concern status.

Audubon Alaska requests that the Board of Game reject proposals 126 through 141 to liberalize harvest levels for brown bears on the Kenai Peninsula and instead allow the Alaska Department of Fish and Game to continue managing the population on a limited permit system with the goal of long-term population sustainability and minimizing bear-human conflicts.

Thank you for considering our recommendations.

Sincerely,

Public Comment #

93

John W. Schoen  
Senior Scientist

Cc: Doug Larsen, Director DWC  
Grant Hilderbrand, Regional Supervisor Region II

Public Comment #

93

RECEIVED TIME FEB. 14. 12:20PM

PRINT TIME FEB. 14. 12:23PM

**Western Interior Alaska Subsistence  
Regional Advisory Council**

c/o Office of Subsistence Management  
101 12th Avenue, Room 110  
Fairbanks, Alaska 99701  
Phone: 1-(907)-456-0277 or 1-800-267-3997  
Fax: 1-(907)-456-0208  
E-mail: Vince\_Mathews@fws.gov

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BOARD

October 31, 2008

Alaska Board of Game  
Alaska Department of Fish and Game  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Board of Game:

The Western Interior Alaska Subsistence Regional Advisory Council, during its public meeting on October 28, 2008 in McGrath, Alaska, reaffirmed its February 2008 recommendations along with additional information from our recent meeting relating to traditional methods of harvesting black bears in Interior Alaska. The Regional Council is resubmitting its recommendations for your consideration during your November 7 – 11, 2008 meeting in Juneau, Alaska.

Note: This proposal was deferred from the March 2008, Interior Region meeting. It was previously listed as proposal 78.

**PROPOSAL 52 — 5 AAC 92.085. Unlawful methods of taking big game, exceptions, and 92.260. Taking cub bears and female bears with cubs prohibited.** Allow the taking of black bear from dens in Units 21 and 24 as follows:

Allow the taking of any black bear from dens, September 25 to May 1 in Units 21B, 21C, 21D, and 24.

**COUNCIL ACTION:**

The Regional Council supported this proposal. Passage of this proposal would allow a customary and traditional use to be allowed. This long-term traditional practice occurs throughout the Western Interior Region and the Regional Council highly supports it being recognized and provided protection in regulation. The Regional Council requests a positive customary and traditional use determination for this long practiced tradition.

Note: This proposal was deferred from the March 2008, Interior Region meeting. It was previously listed as proposal 79.

**PROPOSAL 53 — 5 AAC 92.085. Unlawful methods of taking big game, exceptions, and 92.260. Taking cub bears and female bears with cubs prohibited.** Allow the taking of black bear from dens in Units 21 and 24 as follows:

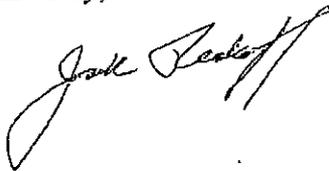
Allow the taking of any black bear from dens from September 25 to May 1 using artificial light in Units 21B, 21C, 21D, and 24.

The Regional Council supported this proposal. Passage of this proposal would allow a customary and traditional use to be allowed. This long-term traditional practice occurs throughout the Western Interior Region and the Regional Council highly supports it being recognized and provided protection in regulation. The Regional Council requests a positive customary and traditional use determination for this long practiced tradition.

The Regional Council is amicable to a later start date after mid-October.

Thank you for the opportunity to share recommendations and comments on proposal important to subsistence users of the Western Interior Region. If you have any questions, please contact me at 1-907-678-2007 or our coordinator, Vince Mathews (contact information in the letterhead).

Sincerely,



Jack Reakoff  
Chair

cc: Peter J. Probasco, Assistant Regional Director, Office of Subsistence Management  
Chuck Ardizzone, Board of Game Liaison, Office of Subsistence Management  
Western Interior Regional Council members  
Affected villages of the Western Interior Region

Name: Nola Lamken

Mailing Address/Contact Phone Number(s): PO Box 624, 99840  
983-3806; borealight@yahoo.com

Comment:

Because the hunting issue lies outside town,  
(hunting is not allowed in town)

I ~~like~~ like the idea of protection outside the occupied  
area for this recessive gene ~~is a~~

This does not limit hunting opportunities.

The option for photography or interaction mostly lies  
within town. However, I like the idea of protection  
and promoting white bear(s)' presence in Skagway.

The issue of "garbage bears" involves people's fears.  
Despite legislation to the contrary, very little limits bears'  
(any bears)' food access. Skagway has not exercised  
responsibility about attractants. Domestic animals,  
gardens, and all attractants must be dealt with.  
That is a separate issue and needs attention.

I support protection for light-colored bears as Ryan  
described/suggested/put forth. Bears <sup>are mostly</sup> only a nuisance  
due to human irresponsibility. Protection lies outside  
the urban area. I think the hunting area needs to be  
moved outside areas of human habitation. Right now,  
the Dyea Road confuses the issue and should not be open  
to hunting. Humans must become more responsible  
and ~~control~~ control attractants - a separate issue

Nola E. Lamken  
Public Comment # 95

In Skegway Borough,  
restrict hunting to dark-colored bears,

Only one hunter can "take" a white(ish) bear, and  
the trait disappears. Many can take a picture,  
receive spiritual inspiration, or feel fond about  
THAT ONE BEAR. I hope hunters can respect  
that feeling. This is to share that resource in a  
balanced manner.

Some  
Hunters say they feel their rights have been restricted,  
Bears' and other wildlife areas also have been limited,  
Increased Dyea useage means bears no longer have ~~access~~ access  
when people are not there. Same goes for housing sprawl,  
There's only so much non-glaciated, wooded area around here,  
We need to improve attractant management,

I think many of these people do not understand the recessive gene and  
fear an abundance resulting in restrictions. We need to get beyond  
excessive, unreasonable fear,

Name: Greg Black

Mailing Address/Contact Phone Number(s): 907 723 1845

Comment: The Black Bear population in west/D is strong and does not need any further regulations. There is no proper description of a glacier/white phase bear and this could easily make hunters become criminals due to improper description. I would like to see the restriction on white color black bears removed from hunting regs. There are already enough rules + regulations on hunting all over Alaska, it is getting out of hand.

December 31, 2008

Tim Henricksen

PO Box 34632

Juneau Alaska 99803

To whom it may concern:

I am writing this letter to comment on the controversy surrounding the lawful taking of the light colored black bear in the Skagway game management area during the spring 2008 harvest season.

It is my understanding that although this bear has been identified by the Alaska Department of Fish and Game as being a "Light Colored Cinnamon phase bear", it is being referred to, by the uninformed public, as a "Spirit Bear".

This misinformed identification of the subject animal has led to an outcry by a faction of people categorically opposed to hunting in general and specifically opposed to hunting in areas they perceive to affect their personal well being. Based on nothing other than sentiment and personal pursuit these people request the protection of several poorly identified, common phases or variations, of the black bear, in a game management area they know little to nothing about.

I will not profess to be a game biologist however I have been intimately familiar with the Skagway, Dyea White Pass and Chilcoot Pass areas for over 50 years and have had direct access to hunt information of the area dating well into the 1910's or earlier. Based on this I suggest scientific evaluation of the area may indicate the present time to be one of the most prolific times for the Black bear species in the last century. I will not attempt to expound on the ramifications of game overpopulation however I will suggest that there are indications the Skagway area may not be far from this stage for the species.

It is my hope that the Alaska Department of Fish and Game will base their pending decision on whether to protect nebulous variations, of a common phase of the black bear, based on sound game management practices and biological facts rather than on the uninformed opinion of a vocal, non hunting, special interest group.

Sincerely,

H Tim Henricksen

Juneau, Alaska

907 321-5921

**Comments to the Board of Game****Proposal 117 – 5AAC 85.065 Seaducks – SUPPORT AS AMENDED**

The intent of this proposal is to request the Board of Game to begin the process of allowing the State of Alaska the opportunity to create a Seaduck Management Plan Framework to augment Federal Management.

**A list of considerations in this Plan can include:**

1. Estimated population Densities of each species within Each GMU
2. Minimum acceptable biomass level of each Species in each GMU;
3. Maximum allowable exploitation rate of each species in each GMU;
4. Maintenance of geographic distribution of each species in each GMU
5. Minimum thresholds for implementation of commercial guided and non commercial hunting;
6. Age and sex composition;
7. Sensitive K – selected reproductive strategies
8. Winter ice minimizing wintering areas hunted;
9. Methods and means;
10. Guided hunting;
11. Full accountability of crippling mortality (60% crippling loss);
12. Trophy hunting;
13. Wanton waste – palatability;
14. Habitat alteration;
15. Potential user group conflicts;
16. The ecosystem function of target species and their prey;
17. Individual Species behaviour; (tight rafting, site fidelity, low flight, difficulty in take off, tame);
18. Individual Species food preference;
19. Geographic characteristics, (narrow bays, open ocean etc);
20. Segregation of species within bays;
21. Meteorological patterns impacting wintering survival
22. Meteorological patterns impacting nesting survival
23. Climate change – ice pack concerns
24. Interactions of users
25. Reporting requirements for guided hunting
26. Presence of endangered Seaduck species in specific GMU's
27. Areas of Refuge
28. Ballistics
29. Gender based bag limits
30. Disturbance

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*Nancy J. St. John*

Public Comment # 98<sup>1</sup>





Other states in the Pacific Flyway embrace this opportunity to participate in specialized State management of their waterfowl species. This safeguards sustainability for special circumstances pertaining to localized areas and regional idiosyncrasies.

An Alaskan Seaduck Management Plan would bring State oversight to our little understood local populations. It can be used as a tool to fill the present void of information, to educate, guide and alert local managers in coastal GMU's. Potential problems such as localized depletions can be averted in our unique harsh upper latitudes.

Thank-you for your consideration to upgrade the quality of management of our diverse Alaskan Waterfowl.

Nancy Hillstrand  
P.O. Box 674  
Homer Alaska 99603

*Nancy Hillstrand*  
907-399-7777

Dear Mr. Chairman and fellow Board members:

Hello, my name is Corey Schwanke and I would like to start with a disclaimer notice. I do work for ADF&G- Division of Sport Fish as a Fish Biologist and I am married to Rebecca Schwanke (maiden name Kelleyhouse). What I have written below are my own thoughts, written and submitted by me personally.

Proposal #27 – Amend and Adopt (relates to proposals 20-26 and 28)

Prior to 2007 (and since the winter of 93-94), the 14C wolverine season was Nov 10-Jan 31. It was reduced from 12 weeks to 7 weeks for the 2007-2008 trapping season and areas of the Chugach State Park (CSP) were opened. I recommend Proposal 27 be amended and adopted, with the season for the remainder of subunit 14C being put back to the Nov 10-Jan 31 season.

I am sorry my testimony is long, but I have a lot to say about this whole situation. I have been successfully trapping wolverine for close to ten years, and my first four were caught while backpacking into subunit 14C back in 2000 and 2001 trapping seasons. I am going to put my closing statement first, then if you want to read on, please do.

**The facts are there is zero evidence that the wolverine population has decreased in subunit 14C. In fact, the ADF&G abundance estimates increased between 1995 and 2007 with the Nov 10- Jan 31 trapping season implemented for all but the last year. Harvest rates have remained relatively stable the last 15 years, once again, not typical of a decreasing population. Furthermore, wolverine densities in 14C remain similar to that of other remote areas in the state. All we have is a two-year skewed sex ratio in the harvest. Not enough reason to restrict wolverine trapping in my opinion considering the increased population estimates from 1995 to 2007 and the relatively stable harvest history.**

After the BOG passed the proposal in spring 2007 shortening the wolverine trapping season and opening areas of the CSP, some unfortunate quotes by ADF&G staff were printed in the Anchorage Daily News painting a doomsday picture for the wolverine population in 14C and most non trappers bought it hook-line-and-sinker. These comments spurred people to chastise the BOG and trappers in general. Basically it was said in a definitive tone that the population cannot sustain one more animal being taken and it was predicted that more wolverine will be trapped with the new regulations passed in spring of 2007. ADF&G staff stated that wolverine trapping in 14C will now start five weeks later, but that's irrelevant because the unit's wolverines are almost never trapped in November. "The claim they're reducing it is a bit of a red herring," was an exact quote. To this day these comments make me very mad because of their deceptiveness, inappropriateness, and the fact that they brought a lot of bad press to trapping. In regard to the regulatory change in spring 2007, I personally felt that the long term harvest would be reduced (not because of overexploitation, but because of the shorter season). I really did not know what to expect the first year or two after the regulation change, but to me it certainly was not a red herring to think harvest might be reduced (for the record the state

Document # 99

harvest dropped from 6 to 2). When it comes to wolverine trapping, time is of the essence. The mountainous country in subunit 14C are some of the toughest trapping conditions I have ever experienced. Heavy snowfall, wind, rain and freeze-thaw conditions all make trapping harder. The naturally low density, long ranging solitary characteristics of wolverine make them extremely difficult to catch in these conditions.

In regards to sustainability, yes, if you just glance over ADFG's comments and presented data, you should be concerned. An 18% exploitation rate looks very bad. My first concern is how accurate is this. My initial thought was it had to be wrong and more wolverine must be available to trappers than ADF&G insinuates. I have two major issues with this exploitation calculation. First off, it is based on an abundance estimate that is a snap-shot in time for just the mountainous areas of subunit 14C. I even heard that ADF&G knows of several wolverine within the subunit, but outside the study area. These animals (not to mention their offspring) are probably going to be available to trappers at some time, and are therefore available for harvest, but are not considered in ADF&G's calculated population estimate or exploitation rate. Secondly, at any given time, some number of wolverine available to trappers in 14C are undoubtedly outside the unit in remote areas and consequentially unavailable to be seen during the time of a survey (i.e., 14A, 6D and 7). Both of these points suggest the actual exploitation rate is lower than what is presented.

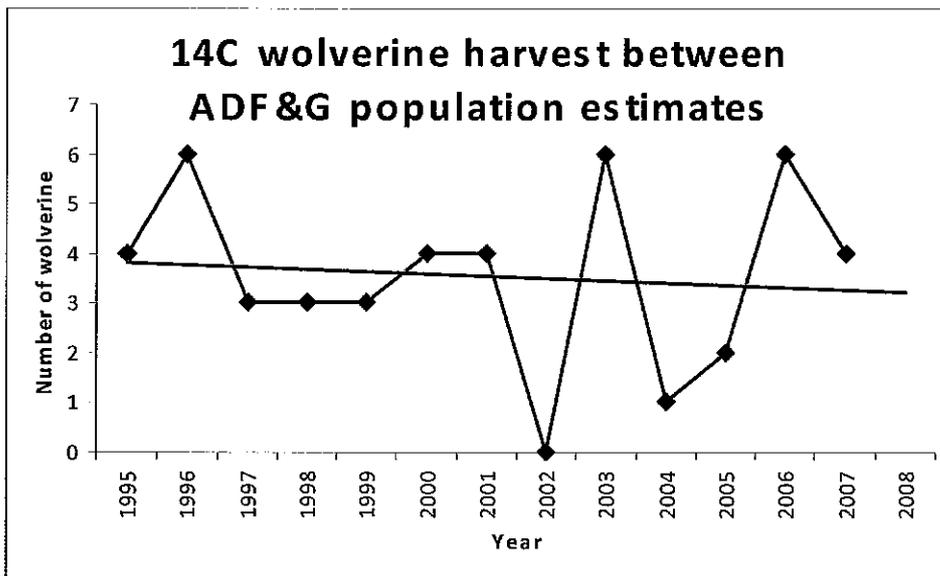
There are some issues with the accuracy of the population estimate itself (within the study area). It is bold to think that all wolverine can be detected during the study. Some females do not leave their dens for days while nursing. If a female does not leave its den, it has zero chance of being detected. Also, nursing females probably do not travel as far with young in a den. If they have food cached close by, their tracks might be very minimal and elusive to an observer. This sightability issue with females was even pointed out in the News Release put out by ADF&G in spring of 2008 summarizing the 2008 survey. It was stated that the 18 estimated wolverine may not represent all females, but that they believed the estimate was off by less than 50%. This admission alone tanks the presented 18% exploitation rate. I am also concerned that not all available tracks can be detected, regardless if the animal is nursing or not. It is highly unlikely to me that all available wolverine (including males, immature females and barren females) tracks can be sighted considering the varying terrain throughout the area (e.g., timber stands, wind blown slopes, shaded slopes, etc.) My concern is that although the survey techniques render a precise estimate (small confidence interval), I seriously doubt all the assumptions were met, and this would render the estimated inaccurate (biased low).

While I applaud ADF&G for developing state of the art survey techniques and being concerned with sustainability, I do not agree with their representation that the current harvest rate is unsustainable. The bottom line is the same trapping regulations have been in effect from 1993 to 2007 (Nov 10<sup>th</sup> – Jan 31<sup>st</sup>). According to ADF&G's abundance estimates (can at least be used as an index), this 12 week season has actually provided sustainability. In fact, the fall population estimates actually increased over the 13 year period between fall 1995 (18 wolverine) and fall 2007 (22 wolverine). During this 13 year period mean annual harvest was 3.5 wolverine per year. That is very similar to the

most recent 5 year average of 3.8 wolverine/year. Twice since 1985 ten wolverine were harvested in a two year period (as with 2007 and 2008) indicating that what happened the last two years is no reason to restrict trapping.

I will admit the sex ratios are skewed unfavorably towards females and it does concern me, but I do not think both area and time need to be restricted on two years of data. I would hate to see a change in season length (most likely permanent) because of a two year sex ratio. Let's continue to monitor harvest under the old Nov 10<sup>th</sup> –Jan 31<sup>st</sup> remainder of 14C season scheme and see what happens. After all, harvest data and abundance estimates show that it has been sustainable. In regards to the long federal subsistence season, I would like ADF&G staff to pursue a 12 week season from the Federal Subsistence Board if they are truly concerned about sustainability and maintaining trapping opportunity for the largest number of people.

I personally do not mind closing wolverine trapping in the CSP for social concerns, but I think it is just too early to restrict the season length to trappers who are only allowed to trap in the remainder of 14C (despite the high female ratio).



Lastly, this is a graph (data provided by ADF&G) showing the harvest since the fall 1995 population estimate. The trendline indicates a slightly decreasing harvest, and ADF&G's population estimates increased during this time. ADF&G even said in their spring 2008 News Release that the current wolverine densities in the mountainous areas of 14C are comparable to other remote areas in the state. This does not indicate overexploitation.

Whether it is inaccurate estimated exploitation rates or strong immigration (immigration should be factored in already), it really does not matter. Harvest rates with the Nov 10<sup>th</sup> –Jan 31<sup>st</sup> “remainder of 14C” season have been sustainable, and should continue to be sustainable.



# **BACKCOUNTRY HUNTERS AND ANGLERS ALASKA CHAPTER**



AK BHA

PO Box 47 Homer, AK 99603

[www.alaskabackcountryhunters.org](http://www.alaskabackcountryhunters.org)

February 9, 2009

## Comments to the Alaska Board of Game Spring 2009 Region II Meeting

Proposal 4 – 5AAC 85.040. Hunting seasons and bag limits for goat.

### **OPPOSE**

Current research on mountain goats indicates that small endemic populations such as found in the Lake George area are extremely sensitive to the removal of even a few mature nannies. Despite the best efforts of ADFG to educate hunters, a disproportionate number of nannies are still taken every year.

Opening a registration hunt in an area this close to Anchorage would likely lead to heavier hunting pressure resulting in a significant increase in nanny mortality.

Mountain goats are a highly prized trophy, and healthy populations are imperative to maintain continued hunting opportunity. Goats are a unique animal, and endemic populations cannot be managed for abundance, rather they must be managed conservatively to maintain huntable populations.

---

Proposal 55 – 5AAC 92.108 Identified big game prey populations and objectives.

### **SUPPORT**

The Mulchatna Caribou herd IM population and harvest objective changes outlined in this ADFG proposal more accurately reflects the reality of what we can expect for sustained populations and harvests of this herd.

---

Proposal 142 – 5AAC 85.040. Hunting seasons and bag limit for goat.

### **SUPPORT**

The mountain goat populations on the Kenai Peninsula have been decreasing steadily. Despite the best efforts of ADFG to educate mountain goat hunters, many are still taking nannies either through misidentification or ignorance.

Recent studies on mountain goats (Cote, Festa-Bianchet 2008) have shown that the removal of even a few mature nannies from a small endemic population of goats can have a severe effect on population and social dynamics.

This proposal would encourage hunters to be more careful in identifying the sex of an animal before harvesting, yet would not overly penalize an honest mistake, nor preclude the opportunity for a non-resident hunter to take a goat in a situation where they may be on a once-in-a-lifetime hunt.

Due to declining populations, it has been some years since any significant registration hunts have been held in unit 15. Should the nanny take be reduced to an incidental level it is hoped that these popular hunts could once again be available.

---

Proposal 154 – 5AAC 92.125. Predation Control Areas Implementation Plans.

### **OPPOSE**

Subunits 15a and 15c are identified as IM units. Moose densities in 15a are currently about 1 moose/mi<sup>2</sup>. Although moose numbers have declined in 15a significantly since the historic highs of the 1980s, those highs were a response to habitat improvement as a result of several fires. The current numbers probably more accurately reflect a stable population density.

Subunit 15a is comprised of approximately 85% Kenai National Wildlife Refuge, and 15% state land. As predator control can not currently be instituted on federal lands, only on the 15% that is state land, there is no reasonable expectation that a predator control plan in 15a would have any significant effect on moose densities.

Before IM predator control measures are instituted it must be shown that they have a high likelihood of success, and 15a does not qualify.

Subunit 15c is a very heavily utilized unit comprised of primarily state and private land. The most recent moose population estimate for this area is incomplete. Due to low snow levels, seasonal moose migration patterns have been erratic, and it is unknown to what degree several large recent wildfire areas are affecting patterns of distribution. There is no reason to believe that the moose population has fallen to levels that would justify IM predator control measures.

Additionally, a large comprehensive assessment of the Kenai peninsula brown bear population is needed to determine the degree to which various predators and conditions differ in their overall effect on moose populations. There is currently no accurate scientific data on brown bear numbers in this area. Given the contentious nature of brown bear population estimates, and the high public profile that the Kenai peninsula commands, it is likely that any IM predator control would be subject to serious scientific scrutiny and public opposition.

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Proposal 157 – 5AAC 84.270. Furbearer trapping.

### **SUPPORT**

This is essentially a house-cleaning proposal that removes any confusion on when trapping season ends on leap years when the month of February has one more day. The regulation should read “the last day of February” instead of “February 28<sup>th</sup>.”

Proposal 168 – 5AAC 92.125(d) Predator Control Areas Implementation Plans

**OPPOSE**

We strongly oppose the legalization of helicopter transport of hunters and their gear, even in predator control areas where a hunter has a valid “control” permit. We also strongly oppose allowing non-resident “hunters” to participate in Alaska bear control efforts under a “control” permit and also to be transported via helicopter in control areas.

What is “hunting” and what is “control” is being evermore confused in both the mind of the public and the mind of hunters, and there is a real danger of a backlash against the entire hunting community because of this. Last summer SFH-Alaska established a number of bait-station “camps” in Unit 16 where tents and bait stations were pre-set up and “hunters” (both resident and non-resident) were flown (by fixed wing aircraft) or boated in to participate in taking black bears over bait. This privatization of predator control barely skirts the regulations governing the transporter and big-game guiding industry, and it is our opinion that SFH-Alaska is breaking the intent of some of those regulations by manipulating the system and working under two separate arms of the same org (SFW and SFH Alaska).

For example, participants in the SFH-Alaska bait camps program were ***required*** to be SFW-Alaska members and pay dues of at least \$30. In order to get around the big-game guiding laws governing any payments and/or compensation made to participate in a hunting activity they then ran the bait camps under the SFH-Alaska sister arm of the org. This was all highly unethical regardless if it was technically legal.

Concerning whether or not this is “predator control” or “hunting,” on the one hand SFH-Alaska says in the paperwork handed out to participants in their bait-camp program, quote: “*This is not recreational hunting, this is managed predator control.*” They state this even though many non-residents participated in their program under general black bear hunting regulations, some of whom even used a registered big-game guide, the very same guide who is the chair of the Anchorage Advisory Committee from which this proposal originates.

And on the other hand, in one of the SFW-Alaska newsletters touting the SFH-Alaska bear control efforts they have a picture on their “Member’s Trophies” page and the caption reads: “SFW Alaska member Rick Kinmon with his third P&Y bruin in 24 hours.”

So which is it, “hunting” or “control”? Do we really want the public to think this is “hunting”? Why would SFW/SFH-Alaska say one thing then promote widely in their literature that it is “hunting”? Why would they allude that black bears taken under relaxed hunting regulations and bag limits are eligible to be entered into the Pope & Young book? (Bears taken under that scenario by bow and arrow or rifle aren’t eligible to be scored in either the P&Y or B&C record books, let alone *three* bears taken over bait in a 24-hour period!) Do we really want to allow transport of hunters and their gear by helicopter as part of this effort that is being touted by SFW/SFH-Alaska here and in the lower-48 as hunting? And do we really want to allow big-game guides to participate in a program that allows helicopter transport of their own clients?

Not only do we strongly oppose allowing the use of helicopters for transportation of hunters and their gear, and allowing non-residents to participate under a control permit and also be transported by helicopter, but we strongly oppose extending the bear baiting season to encompass the entire summer months and allowing bait stations to be put along the shorelines of rivers like the Susitna that see an untold number of non-hunting recreation and river tourism.

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Proposal 170 – 92.080 Unlawful methods of taking big game, exceptions; and 92.085. Unlawful methods of taking big game, exceptions.

### **OPPOSE**

AK BHA opposes the use of snares by hunters to take black bears. There is nothing in this proposal outlining what kind of snares could be used, whether they would be neck snares or foot snares, the size of snare wire, how brown bears or other non-target species will avoid being captured, or any kind of time frame on setting and checking the snare to avoid hide slippage if the hide is to be salvaged.

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Proposal 189 – 5AAC 92.125(d) Predator Control Areas Implementation Plans

**OPPOSE**

Our comments in opposition to Proposal #168, which are very similar to this proposal, should be used by the Board to explain why we also strongly oppose this proposal.

We would ask that the Board of Game also take note of the stark contradictions within this proposal. SFW/SFH-Alaska has said publicly in their literature that this entire bait-camp program and privatization of predator control is a “collaborative effort” among SFW/SFH-Alaska, ADFG, and the Board of Game.

Yet in this proposal they state that the Department of Fish and Game overruled allowing the use of helicopters to transport hunters and their gear. How then has this ever been a “collaborative effort” with ADFG when SFW/SFH-Alaska is putting in a proposal that seeks to overturn ADFG policy?

One of the aspects of this Board-approved black bear control program AK BHA has always opposed is the hypocrisy in allowing the legal wanton waste of perfectly edible and healthy spring black bear meat. The ostensible goal of this control effort is to put more game meat of one kind on the tables of Alaskan residents, yet the Board waived the meat salvage requirements for another game meat that is just as healthy and protein-laden as the other. How does that make any sense at all?

We oppose *all* of the SFH-Alaska proposals regarding Unit 16 predator control implementation plans. We further request that the Board of Game ***rescind the allowance to wantonly waste healthy black bear meat in the spring season.*** If there aren't enough moose to put food on the tables of Alaskans, but plenty of black bears...then let's set the right example in showing hunters that black bear meat is a healthy alternative to moose meat.

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Proposal 190 – 5AAC 92.039. Permit for taking wolves using aircraft; 92.044. Permit for hunting black bear with the use of bait or scent lures; 92.068. Permit conditions for hunting black bear with dog; 92.080. Unlawful

methods of taking big game; exceptions; 92.085. Unlawful methods of taking big game; exceptions; 92.106. Intensive management of identified big game prey populations; 92.108. Identified big game prey populations and objectives; 92.110. Control of predation by wolves; 92.115. Control of predation by bears; and 92.125. Predation Control Areas Implementation Plans.

## **OPPOSE**

This proposal includes three distinct changes to existing statutes.

The first is the allowance of carbon monoxide (gas) cartridges by ADFG and Federal personnel to ostensibly be used in wolf dens in order to kill wolves. The only reason we can think of for this change is that the practice of “denning” (killing wolf pups specifically) is to be more widely used by government employees in Alaska in spring as part of wolf control efforts.

The state of Alaska currently allows the aerial gunning of wolves by private pilots participating in wolf control programs. Generally, those aerial wolf control efforts done by private citizens are very effective in reducing wolf numbers while at the same time they shift much of the monetary burden of wolf control away from the Department.

It is entirely unclear what effect allowing the use of carbon monoxide cartridges to euthanize wolves will have, whether there will be increased wolf control by government employees in conjunction with private aerial gunning efforts, or whether there will be a shift of the burden of wolf control on the state and federal government.

If that was clarified AK BHA could better comment on that first facet. We don't necessarily oppose the use of carbon monoxide gas cartridges by government employees for euthanizing wolves, if that is done under a prudent and necessary wolf management program.

The second aspect of this proposal basically would permit something that is already allowed - the use of helicopters by government employees to take wolves from the air. Last spring ADFG employees did just that on the central peninsula. What is troubling about this second aspect of the proposal is the added words about bear management activities, so we can only assume

this facet is intended to allow the lethal control of both black and brown bears by government employees using helicopters for transport to the field.

Again, it is entirely unclear what the passage of this facet of the proposal would entail. Does it mean we would have widescale killing of both black and brown bears by government personnel as part of any bear control efforts, or simply allow government employees to euthanize specific bears that are a danger to the public at large? It is our understanding that ADFG and other government employees can already use a helicopter for transportation and tracking of problem bears that they feel need to be euthanized.

We oppose the lethal control of black and brown bears by government employees as part of any bear control program. Black bears are an important food and hide resource for many hunters, and brown and grizzly bears are an important big game trophy animal for both resident and non-resident hunters. We can see no reason that bears should ever need to be killed by government employees unless a specific bear (or bears) is a threat to public safety. Therefore we oppose the 2<sup>nd</sup> facet of this proposal.

The third part of this proposal seeks to allow the use of snares by government employees to take black bears. There are no specific guidelines as to the type of snare that would be used, how these snares would prevent brown and grizzly bears or sows with cubs from being captured and killed, or how often such snares would have to be checked, or if any hide or meat would have to be salvaged. We oppose the use of lethal snares by government employees to take black bears.

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Proposal 192 – 5AAC 92.039. Permit for taking wolves using aircraft; 92.080. Unlawful methods of taking big game; exceptions; 92.115. Control of predation by bears; 92.110. Control of predation by wolves; and 92.125. Predation Control Implementation Plans.

## **OPPOSE**

If this proposal were to be adopted it would legalize the aerial shooting of bears (both black and brown bears) by the public under a control permit. AK BHA strongly opposes the aerial shooting of any bears, even in control areas.

The other part of this proposal seeks to legalize the use of helicopters for transporting hunters, unprocessed game or parts of game, and hunter gear within a predator control area. AK BHA strongly opposes the use of helicopters for transport of hunters, even those hunters operating with a control permit, as we have outlined in comments on similar proposals.

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Proposal 198 – 5AAC 92.044. Permit for hunting black bear with the use of bait or scent; lures.

### **OPPOSE**

Alaska is *not* the lower 48 and neither is it like many of the Canadian provinces that this proposal compares it to. Just because a lower-48 state or a Canadian province does things one way does not mean that Alaska should necessarily follow suit.

The requirement for an assistant guide or registered guide to accompany a paying client who is hunting black bear over a bait site is one that is grounded in guide ethics, safety concerns for the paying client, and concerns for the wildlife population being hunted.

This proposal allude that if passed more diasbled hunters may be able to participate in guided black bear hunts over bait. If this proposal is adopted, a guide could simply leave such a client in the field, alone, and all manner of things could happen in the guide's absence. It isn't that rare for a black bear to try to climb into a treestand. Neither is it rare for a bait site to be visited by the brown bears common in Alaska but not even found in the lower 48 and many Canadian provinces. And certainly it is not rare for a sow with cubs to visit a bait site, but for the cubs to initially remain unseen.

According to one of the options in this proposal that says a guide would only have to remain in radio contact with a client at a bait site, "when a bear is shot the guide tracks and recovers the bear." How is a guide going to track and recover a wounded animal he or she never saw shot to begin with (to gauge the accuracy of the shot and type of wound), and just how long would it take a guide in radio contact to even reach the bait site after an animal was shot and wounded? All these questions bring up even more troubling questions and possible scenarios.

If a contracted guide is allowed to have a number of paying clients in the field at any one time hunting over various bait sites, yet that guide or an assistant guide is not required to physically be present at *any* of those sites, what happens when the radio blares and Hunter A says he has just wounded a bear and it got away, Hunter B says he needs help because he thinks he's having a heart attack, and Hunter C calls and says there is an angry boar grizzly trying to get at him? What happens when disabled Hunter A drops his radio out of the treestand and is unable to retrieve it? Or the batteries go dead?

There is nothing in this proposal that would even specify how physically close a guide would have to be in terms of time or distance to one or a number of clients left out in the field at a bait site.

Alaska does have some of the most stringent guide regulations, and for good reason. It's big wild country out there in the Alaska bush and when a guide is contracted, Alaska guide ethics and regulations mandate that an assistant or registered guide accompany the client in the field on the hunt. If the Board of Game were to pass this proposal it would set a precedent that would bring all other guided hunts and guide regulations into question.

We oppose this proposal for the above reasons and we also oppose the third option to remove language that prevents a hunter (who isn't a guide) from receiving remuneration or compensation for establishing bait sites for other hunters.

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Proposal 201 –5AAC 92.130. Restrictions to bag limit.

### **SUPPORT**

We strongly support this proposal. The “wounding” regulation in this proposal is already a part of bear hunting regulations in Region I. We agree with APHA that this “wounding” regulation should be a standard statewide. If an animal is wounded, the hunter should certainly continue to hunt for that animal and try to recover it, but if that animal cannot be found then it should be counted against that hunter's bag limit.

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Proposal 215 & 219 – 5AAC 92.171. Sealing of Dall sheep horns.

## SUPPORT

These two proposals are nearly identical. The sealing of Dall sheep horns is an important facet of sheep management that can help biologists gather more information about sheep populations and genetics, as well as curb illegal harvests and transport of trophies. Currently only the horns from full-curl rams are required to be sealed, while sheep horns taken in “any ram” hunts are not required to be sealed. We feel it would be prudent to include the “any-ram” horns in the sheep-sealing program.

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Proposal 237 – 5AAC 92.125. Predation control areas implementation plans.

## OPPOSE

AK BHA opposed this proposal in spring 2008 with extensive supplied written comments as well as oral testimony. At that time the Board of Game voted in opposition to every aspect of this proposal except to possibly allow the sale of tanned and untanned brown bear hides taken under this program, and then deferred this proposal to the fall statewide meeting.

It is unclear why this proposal is yet again on the docket at this time un-amended.

Just so it is on the record, at the Spring 2008 Region III BOG meeting, the Alaska Department of Fish and Game opposed this same proposal in their written comments, quote: **“The Department does not support the taking of any grizzly bear by trapping, snaring, or same-day-airborne, or the sale of tanned bear hides, even in brown bear predator control areas.”**

AK BHA does **not** support the snaring or trapping of any bear species, the aerial gunning of any bear species, or the sale of brown bear hides taken in bear control areas.

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Proposal 239 – 5AAC 92.125. Predation Control Areas Implementation Plans.

## **OPPOSE**

The last two moose population density estimates for Unit 21E in 2000 and 2005 show a population of 7,000-9,000 moose. This proposal incorrectly states that “the current moose population and harvest estimates are below the Intensive Management population and harvest objectives established by the Board.”

In fact, as the proposal text states, the high end of the moose population estimates falls within the low end of the Intensive Management population goal of 9,000 moose.

And according to the proposal data, the most recent composition surveys for a part of Unit 21E show bull:cow and calf:cow ratios within or above the management objectives.

The only conclusion we can reach based on the available ADFG data is that the moose population in Unit 21E meets the IM population objectives as well as the management objectives.

We are highly sympathetic to the residents of the middle-Yukon region, and applaud and respect the work the Yukon-Innoko Moose Management Working Group has done in the past years in trying to provide more moose harvests for local residents and to build a healthy sustainable population of moose for all. All the available data points to the conclusion that their efforts have not been in vain, that the calf:cow ratios are very high, and that the bull:cow ratios meet the management objectives. And again, the lower end of the IM population objective has been achieved.

If we are to base any predator control implementation plan on “science,” then the science should be done first and the science should back up any need for such a plan. When it does not, we can see no justifiable, or legally defensible, reason to implement a predator control plan.

Neither can we ever see a need to implement a predator control plan when non-resident hunting for the species supposedly at low levels is still going on. In fall of 2008, 47 permits were allotted to non-guided non-resident moose hunters (DM 837) for Unit 21E. 12 permits (DM 839) were allotted to guided non-resident hunters. In total, that is 59 permits allotted to non-resident moose hunters to hunt moose in unit 21E. How can the Board

justify ever implementing a predator control program with the ostensible goal to provide more local resident hunting opportunity and harvests when non-resident “trophy” hunting is still allowed at such numbers?

We oppose implementation of a predator control plan at this time for this area based on the above comments.

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AK BHA wishes to thank all of the Board of Game members for their service to the state of Alaska and to all hunters, trappers, and wildlife viewers. We recognize that serving on the Board of Game is often a thankless task. Regardless of whether or not we agree with a Board decision, we wish the Board members to know they have our full respect and our deep appreciation for the hard work and time they committ for all of us and for Alaska’s wildlife.

Thank you for allowing us to comment.

Sincerely,

Dave Lyon – co-chair AK BHA

Mark Richards – co-chair AK BHA

alaskabha@starband.net

RECEIVED  
FEB 09 2009  
BOARDS

Feiler + Craig  
3430 Main St  
Anver, Ala 99603

Dear F + G

For the past 30 or more years I have worked in Tourism. The amount of people who flock here to see our birds is extraordinary. They come to see the shore birds then get sooo excited to see the cranes!!

They love to attend the lectures on cranes and when I tell them about what I have learned they want to know where + when to see them.

THE CRANES are USED TO US. We enjoy them to such an extent that we go out for dinner at places where we can view them.

Only F + G could think of shooting my mother if it gave them pleasure. I have tasted Crane and it is terrible. I have watched them and get as much joy from seeing them as you get from killing.

Some of us have been traumatized by guns. My sister was shot through the head. I suppose you enjoy hearing that but your gun blast makes me remember it every time.

Figure it out.

Sincerely,

F Feiler + G. Craig  
Public Comment # 101 over

Where in Ak can a person go  
where F + G or F + W is not killing,  
maiming, shooting, Knifing, etc etc.  
oh I forgot poisoning.

ALASKA DEPARTMENT OF FISH AND GAME  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
(907) 465-6094 FAX

RECEIVED  
FEB 09 2009  
BOARDS

Dear Board of Game:

I am writing to lend support to Board of Game Proposal #118 to temporarily close the sandhill crane season in Management Area 15C. The lesser sandhill cranes that summer in the Homer area are very popular among the residents as well as the tourists. The problem is that many of the residents feed the cranes in their yards, and as a result the cranes have become quite tame. People can walk within a few feet of them without disturbing them at all. They have no fear of humans. No self-respecting hunter would even think of pointing a shotgun at one. But it would take only a few who would kill just for the meat and ignore the bag limits to devastate the population. One could kill a half dozen with one 12-gauge shotgun blast. I have hunted most species and lived off game meat—mostly elk—for 20 years, but would find hunting these cranes a demeaning endeavor.

We have cranes coming and going in our neighborhood all summer; we all look forward to hearing their calling and watching their dancing acts.

As the proposal states, survival of crane colts is not high in normal situations, but it is even lower here. We know a lot more are born than survive to migration time. We see and hear of enough breeding pairs and young colts to expect as many as 30 juveniles by season's end, but we have never seen more than 6 after the cranes gather for fall migration. We know that productivity is good among the breeding pairs, but we also know that many colts are killed by dogs. Obviously many more are killed by the natural predators too.

I hope we can keep at least the cranes we have and possibly build the flock to a number closer to the carrying capacity of the area at which time they could possibly withstand a hunting season again.

Thank you for considering this proposal.



Duane Howe  
41640 Gladys Ct.  
Homer, AK 99603

Attn BOG Comments  
Ak. Board of Game  
Spring 2009 Proposals

RECEIVED  
FEB 09 2009  
BOARDS

I am providing comments which are given below.

Proposal 14. I am AGAINST this proposal. Any hunt that cannot be open to all residents should be closed to non-residents. There are large numbers of resident hunters who are denied the opportunity for this hunt, as such non residents should not be allowed permits.

Proposal 15. I am FOR this proposal. There are large numbers of resident hunters who are denied the opportunity to participate in this hunt, as such non resident hunting should be eliminated.

Proposal 16. I am AGAINST this proposal. See comments to Proposals 15 and 14.

Proposal 17. I am AGAINST this proposal. A large number of proposals all address the same issue, too many permits going to non-resident hunters. There are large numbers of resident hunters who are denied the opportunity to participate in this hunt, as such non-resident hunting should be eliminated. The only reason I can find to allow non-resident hunting is that it makes money for the guides. The guides are given the opportunity to ply their trade the state's involvement should end there, the state is not required to insure the guides have paying clients.

Proposal 82. I am FOR this proposal. Salvage of head and hide serves no purpose other than to make the hunt more onerous to individuals who hunt on foot, like me. A two pack hunt has become three with this requirement. Individuals who hunt on four wheelers are not affected. Maybe this requirement could be eliminated for the walk in only area but enforcement would be difficult. There is also no net value for the hide, after paying for tanning the hide can only be sold for about \$220, it costs \$200-250 to tan. If someone actually wants the head or hide nothing in the regulations stops them from keeping it.

Proposal 83. I am FOR this proposal, see comments to Proposal 82.

Proposal 84. I am AGAINST this proposal. Adopting this proposal would eliminate all other subsistence hunters who do not live within the Ahtna villages. The Ahtna council assumes that no others in the state practice a subsistence lifestyle. Their proposal is biased against any community members who are not members of their tribe. Their proposal is unconstitutional.

Proposal 86. I am AGAINST this proposal. The existing regulation insures that those hunting the herd have and will maintain that tradition. The proposer has also misinterpreted the regulation, the regulation against taking animals elsewhere in the state

only applies if a kill is made. So if the Tier II permit has not been filled an animal elsewhere can still be taken. The only way this applies is if they take part in the community harvest program. I don't see why Athna should have things both ways.

Proposal 87. I am AGAINST this proposal. This proposal does not solve anything. This hunt is a subsistence hunt so income should be evaluated. The court said that income could not preclude a person from getting a permit but that it could be used in the scoring system.

Furthermore, the existing point system should NOT be adjusted to further bias the scoring in favor of rural residents, as suggested in this proposal, by adjusting the scoring of factor B. Food and gasoline expenses should not even be part of the scoring system as they are not a measure of income they simply measure the relative cost of a commodity. An argument could be made that rural residents are less needy because they can afford to pay more for these items. State Department of Labor statistics clearly show that the vast majority of people in the state who live below the poverty level reside in Anchorage. The permit scoring system should be adjusted so that more Anchorage residents receive permits as that is where there is the greatest need.

The BOG could eliminate the scoring system entirely if they would only eliminate the use of motorized vehicles on this hunt, except for travel on the main highways. Those who truly are subsistence users will put in the necessary effort to insure taking of game. The BOG could also impose a restriction that requires hunters be more than 100 yards off the road to take big game. If the herd exceeds population goals then an emergency order could always be issued to allow motorized vehicles.

Proposal 88. I am AGAINST this proposal. Need is part of subsistence.

Proposal 89. I am AGAINST this proposal. Historic use is part of subsistence

Proposal 91. I am FOR this proposal. Salvage of head and hide effectively punishes those who hunt on foot, and these people are the true subsistence users.

Proposal 91. I am FOR this proposal.

Proposal 94. I am AGAINST this proposal. Not having a 100% success rate is no reason to change the hunt dates. I also do not believe that staying in the field a few more days poses an economic hardship. Most moose are successfully hunted later in the season. Nothing prevents these individuals to delay their caribou hunt by a few days if they want the two hunts to coincide. Also, the number of permits issued is in part based on the success rate of the past, allowing a success rate approaching 100% is not likely healthy for the herd.

Proposal 210. I am AGAINST this proposal. This creates another special user group, of which there are already too many. This would take a permit from one group to give to

another. Additionally, the current regulations do not prohibit the use of a bow should an individual draw a sheep permit.

Proposal 211. I am AGAINST this proposal. If additional permits could be granted to a late hunt for a special group they should be made available to all hunters through the general permit process. Nothing in the regulations prohibits an individual from hunting with a bow. There is no need to adopt this proposal.

Proposal 241. I am AGAINST this proposal. All residents should be given an EQUAL opportunity to draw a permit. The current random drawing system does this. This proposal basically caters to individuals whining because they never receive a permit. By taking half the permits for this bonus system you are in effect punishing all hunters who wish to be treated fairly. A random drawing is the fairest system that can be devised.

Proposal 242. I am AGAINST this proposal. I am against creating additional, special user groups. There are no regulations or laws in place that prohibit handicapped individuals from hunting. All residents are to have equal access to fish and game this proposal makes one group more equal than another. It is unfortunate that these individuals are handicapped but why should a special hunt on state lands be created? Why doesn't every hunter in the state be designated his own special hunt designed around his needs and desires?

Brian D. West  
1000 Oceanview Drive  
Anchorage, Alaska 99515



ALASKA DEPARTMENT OF FISH AND GAME

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

(907) 465-4110

(907) 465-6094 FAX

Neil Wagner (907) 235-69532095 Jakes Little Fireweed Lane

POB 1801

Homer, AK 99603

At first I was astonished when I heard about this proposal, then I decided that I must write in protest.

Please remove Game Management Unit 15C from the hunting of Sandhill Cranes.

As a thirty plus year resident of Homer it appears to me that the Sandhill Cranes are declining. We never see the larger groups of them. Certainly the excess of Bald eagles baited to the Homer spit each spring has also caused the death and harassment of many colts and mature Sandhill Cranes.

In the Homer area the cranes have been fed and humanized by their contact with friendly humans for decades. Opening up the area for hunting would be setting them up for slaughter. They and their haunting call are both symbols of Homer.

When I think of all the challenges these magnificent birds go through in their migration each year and the vulnerability of their wintering habitat it just plain doesn't make sense to stack any more pressure on their already fragile survival. Hunters have lots of other birds to shoot at. Please leave it at that.

Thank you for your time and consideration.

Neil Wagner

*Neil Wagner 2/9/09*



2/9/2009

Alaska Department of Fish and Game  
Attention: Board of Game Comments  
Dear Sirs,

RECEIVED  
FEB 10 2009  
BOARDS

I wish to report my position on Item #49, which would create year round no limit Brown Bear hunting. This would create over-kill on Bears. I do support Item #63. This one would have the season start September 1st, giving 10 more days to hunt while Bears are still on the river.

I also support Item #61 which does away with the Nushajak River and Tributaries Moose permit for non-residents. The last day to purchase these permits is August 30th. This means that those hunters must arrive a full week earlier before the Season starts. I have been guiding for the past 6 years, forty minutes upstream of Harris Creek. Each season I see no more than two or three Resident Hunters past Harris Creek and none in Klutispak Creek or King Salmon River.

I appreciate the opportunity to voice my opinions on these VERY IMPORTANT concerns.

Sincerely

*Wayne M. Brewer*

Wayne M. Brewer  
3103 Woodmore Lane NW  
Cleveland, Tn 37312  
Alaska Guide License # 4859

PH. 423-476-6972

Public Comment # 105

RECEIVED TIME FEB. 10. 3:47AM

PRINT TIME FEB. 10. 3:48AM



ALASKA DEPARTMENT OF FISH AND GAME  
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RECEIVED  
FEB 10 2009  
BOARDS

As many people know, the Sandhill Crane population in the Kachemak Bay area is very low, probably roughly only 200 birds during summer.

To justify crane hunting in this area, population surveys should first be made to see if local numbers are adequate to sustain this small population.

Also, harvest data should be ascertained before allowing continued local crane hunting.

The Alaska Department of Fish and Game has not obtained this information, so hunting cranes here is not prudent, especially since these long-lived birds have very low productivity.

I am in Support of Board of Game Proposal #118 that would close the season on cranes in this area.

Patricia Mayhan

Box 2387

Homer, Alaska 99603



RECEIVED  
FEB 11 2009  
BOARDS

RECEIVED  
FEB 09 2009  
BOARDS

Dear Board of Game Members,

**I SUPPORT PROPOSAL #218**

Thank you for taking the time to read Sheep Proposal #218 page 177. I feel very confident it is a proposal Alaskans will whole-heartedly support. You passed my proposal last year for Region III and then at the eleventh hour it was voted down after everyone thought it was a done deal. Pressure from the commercial guides weighs heavily on Board decisions and generally this is not good news to the Alaska resident. Sheep hunting has created more conflict between residents and commercial operators than any big game specie due to the fact there is a lot of money involved for the commercial operators. Talk to any resident sheep hunter and he will have several stories to share with you.

I would like to see this proposal go state wide. I am submitting this to Region II this spring, this fall will be Region V, and next spring is back to Region III. There aren't sheep in Region I and there is no Region IV so the state wide effort could be completed by March 2010.

The success rate for resident sheep hunters is about 1 of 4 and the success rate for non-resident sheep hunters is 3 of 4. Approximately 25% of Alaskans sheep hunters are successful and 75% of non-residents are successful. In 2007 non-residents took 44% of the sheep in Alaska.

Sheep tags represent about 12% of the license revenue. Moose is 48%, and caribou is 21% both of which can be non-guided hunts. If the Board of Game wants to generate more money for the State they should work on dropping the guide regulation, raise the tags to \$2,500 and put all units on permit drawings for non-residents. This will generate a lot of money for the state because non-residents will be able to afford a sheep hunting trip where a \$15,000 guided hunt would be out of the question. License applications will go way up and the numbers can be controlled with non-resident permit areas. The commercial operators will use safety as an issue, but we have non-resident guides (who cannot legally hunt sheep in Alaska) guiding non-residents. If you retire in "the lower 48" and want to return to Alaska to hunt sheep, you will have to hire a guide because it is not safe. Other states have higher sheep tag fees than Alaska and do not require non-residents to use a guide.

My proposal actually shortens the total season for resident and non-residents by two days. The residents will be sacrificing the last seven days of the traditional season and non-residents will not be allowed to hunt the first two days of the traditional season.

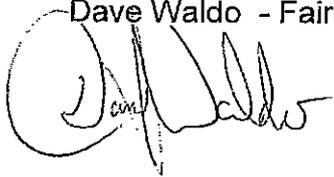
Thanks again for going through this information and I hope you will pass this proposal so young and old Alaskan sheep hunters can have a quality experience.

Regards,

*Tom Lamal February 11, 2009*  
Tom Lamal

I **support** BOG Sheep Proposal # 218 on page 177. I've had conflicts with guides while sheep hunting – some are very protective of their guide areas. I think this proposal can help to mitigate these situations, improving the quality of the hunt for both resident and non-resident sheep hunters. The impact to the guide's livelihood seems negligible. The offset start dates allows for most of the resident hunters to be out of the field by the time the non-residents can hunt.

Dave Waldo - Fairbanks

 2/9/09

sheep.txt

Proposal # 218 -5 AAC 85.055. Hunting season bag limits for Dall Sheep

I am in favor of this proposal, this is an issue of management of the natural resources for the benefits of the residents of the state. Fish and Game should be managing the resources for the benefit of the residents. Currently this is not the case. The change in the regulation is advantageous on a multitude of levels. From a management perspective, from a logistic perspective, and from a safety perspective. It is a win win situation, and as I said I support it 100%



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BOARDS

Eruk Williamson, Anchorage, AK

Proposals 6, 179

Proposal 6 moves or adds an archery only season in "remainder of Unit 14C" to Nov. 1-10; Proposal 179 does the same in Unit 14 A and B.

I support both Proposals.

Adding archery only seasons in these accessible hunting areas provides a considerable hunting opportunity with small likelihood of increasing harvest beyond sustainable numbers.

Proposal 176

I am in favor of this proposal, but believe it will result in a higher harvest than the dates in proposal 179 (Nov. 1-10). Proposal 179 dates are less likely to result in a harvest that will require a readjustment of seasons in the next Board cycle.

Proposal 177

This proposal increases the number of antlerless moose permits, designating them for the archery season only (Unit 14A). I am in support of this proposal. It will provide opportunity to a segment of the hunting population that has a low success rate any way.

Proposal 180

The problem with this proposal is extension of season to Sept. 25. If the herd can support additional harvest, then the proposal is fine. I have to agree with the proposers that the good intentions of the Board when moose seasons were set to start Aug. 20 have not achieved the goal of providing more opportunity for youth to hunt moose. School starts in August, and that is just too early in the season to hunt moose anyway.

Proposal 206

I support this proposal for the reasons given by the Mat-Su AC. I understand that each unit and subunit needs to be considered separately, and ask that the staff bring this proposal up during reports for each of the Units listed.

Making hunters choose to hunt only with a bow when buying a hunting license sounds impractical, and doesn't make sense when many hunters pursue several species in a year.

Proposal 207

I am in support of youth hunts, although the dates for this hunt make it unattractive. Move the dates to Nov. 1-10 (same as archery season dates in Proposals 6 and 179).

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BOARDS

Proposal 190 I SUPPORT this  
Proposal USA APHIS Employees are  
highly trained Professionals

Proposal 192 I OPPOSE This Proposal  
The general Public should never be  
allowed to use helicopters for any  
type of hunting sport or under a predator  
control permit. There is too much chance  
for a abuse only state and Federal  
Employees should be allowed to use  
helicopters.

Proposal 199 I SUPPORT this Proposal  
A Extra 15 day in June are better  
to hunt than in April most birds don't  
even come out of there dens until  
May

Proposal 222 I OPPOSE this Proposal  
There is no Biological Reason upland  
birds are plentiful and I won't stop  
anyone who doesn't follow the Rules  
now

Public Comment # 111

Proposal 57 I OPPOSE This  
Proposal There are several minor  
caribou herds in unit 9 17 18 19  
That can be Hunted without hunting  
The Melchatna Herd

Proposal 114 I OPPOSE this  
Proposal ADQ hasn't Determined if  
There is a need to change the Boundary

Proposal 170  
I OPPOSE this Proposal unless Permittes  
are Required to take a Training course  
on trapping Bears and they are Required  
to use specific Types of sets that  
won't catch non target species

Proposal 171  
I OPPOSE This Proposal For the same  
Reason I oppose Proposal 170 Before  
the general public is allowed to trap Bears  
one should have to take a trapping class  
Just like for Baiting Bears. These  
Proposals are poorly written we don't  
Need a bunch of inexperienced people  
out there catching non target species  
and that is what will happen if these  
Proposals pass as written

Proposal 172 I OPPOSE this Proposal  
I trap in 14B and I see lots of  
Legal moose while I am trapping

# ALASKA SURVIVAL

Box 320 Talkeetna, Alaska 99676

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FEB 11 2009

BOARDS

2/4/09

To the Board of Game:

These are comments regarding Proposals 73-76, 79, 114 which have to do with Unit 13.

We do not believe Unit 13 should be turned into a Moose Farm. We do not believe that the evidence is there to support that the moose populations in unit 13 are in trouble.

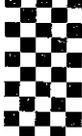
1. We question the need in proposals 73 & 74 to extend the black bear season.
2. We oppose the proposals 76 & 79 that would increase the bag limits on brown bears.
3. We oppose the baiting of brown bears in the predator control area of unit 13E. A need has not been established that this is necessary. Bear baiting in this area would cause bears & human conflicts because bears will be conditioned to actually look for food in connection with human presence & dwellings. 13E has a tremendous amount of cabins, permanent and recreational use by people of the area abounds. We believe that it is irresponsible

to have bear baiting in 13E. It is a human safety issue. We certainly don't need for food to be put out for bears.

4. We oppose Proposal 114 that would change the present boundary of the predator control area to the west which would include Denali State Park. ~~Pre~~ Actual predator control in the Park conflicts with the purpose of the Park and conflicts with Park Management.

Please consider this.

Becky Long



# Kachemak Bay Conservation Society

3734 Ben Walters Lane  
Homer, AK 99603

Alaska Department of Fish and Game  
Board Support Section  
PO Box 115526  
Juneau, AK 99811-5526

RECEIVED

FEB 11 2009

BOARDS

February 9, 2009

Dear BOG Members:

The Kachemak Bay Conservation Society (KBCS) is based in Homer, Alaska and has over the last 30 years been involved in numerous conservation issues that affect the Cook Inlet region, particularly the Kachemak Bay area. We are grateful that our region generally has an abundance and diversity of wildlife habitat and populations and we will continue to be proactive in sustaining this heritage. We support both the consumptive and nonconsumptive uses of wildlife providing each activity is consistent with good conservation practices. State statute (AS 16.05.221) defines conservation as the "controlled utilization of a resource to prevent its exploitation, destruction or neglect."

Following are KBCS comments on some proposals for the Spring 2008 Meeting of the Board of Game (BOG). In some cases our comments apply to more than one proposal.

### Proposal 42 – Support.

This proposal addresses a temporal conflict that exists between bear hunting and viewing in an area of Katmai National Preserve where both activities are allowed. In late fall (October) bears are attracted to and congregate at certain salmon spawning areas within the Preserve. This in turn attracts bear viewers and bear hunters as well as sport fisherman, which sometimes get in each other's way. The proposal suggests that a two week delay in the opening of the brown bear season would mitigate this conflict, yet still provide good opportunity for bear viewing and hunting.

While we believe that there is often compatibility between hunting and wildlife viewing, conflicts do occur. Resolution of these conflicts is often based on acknowledging that not all uses of wildlife should coexist at the same time and /or place. Since choices have to be made, we think that congregations of bears are more suitable to viewing than hunting. With this proposal, a hunt would still take place but at a later date when bears are more dispersed and less habituated to the presence of people, which many hunters prefer. Accordingly, we favor

delaying the brown bear hunting season in Unit 9C from October 1 until October 15 and urge that you approve this proposal.

Homer is the gateway for brown bear viewing in Katmai National Park. Consequently, resolving this conflict has important economic ramifications for the Homer economy. In addition, many of our members have enjoyed bear viewing in this area.

### **Proposal 45 – Support**

This proposal essentially eliminates the fall brown bear hunt in Unit 9C, but still allows a spring hunt in even years. The purpose of this change is to reduce the overall harvest of brown bears in Katmai Preserve to a level that better sustains more abundant populations than the status quo as well as better age diversity. Based on the reports that KBCS receives from those who are familiar with the area, the dramatic increase in harvest the past few years seems to be excessive and maybe unsustainable. Reducing hunting pressure should result in a higher quality hunt, an important factor with brown bear hunters.

This proposal would obviate the need for proposal 42.

**Proposal 117 (sea ducks), 118 (sandhill cranes), 119 (beaver), 120 (beaver), 121 (red fox), 122 (marten), 123 (wolverine) – Defer Based on Alternative Action.**

All of the above proposals deal with the central issue of local exploitation of game birds and small furbearers. Rather than discuss the specifics of each proposal, we would rather address what appears to be a systemic problem for the Kenai Peninsula and, no doubt, other areas of Alaska. Based on the concerns expressed in these proposals (with the exception of 119) it is apparent that even though the regional population of a species may be healthy, local populations can be hunted or trapped at levels that exceed sustainable yield, thereby resulting in long term, local depletion of these species - maybe even extirpation. If so, future generations of consumptive and nonconsumptive users will be denied the opportunity to harvest and/or view these species locally. We believe that the Board of Game can and should be instrumental in mitigating this situation.

If localized depletion or extirpation of game birds and small furbearers is to be avoided, the Division of Wildlife Conservation needs to have the wherewithal to micromanage these species. It needs information and authority comparable to the management of Alaska's fisheries. Alaska is rightfully proud of the fact that it has sustainably managed its fisheries for decades. This has been largely accomplished by micromanaging fish populations and habitat. In essence, ADF&G has over the years acquired the information that is needed to prescribe escapement for virtually every watershed in the state and how much can be sustainably harvested. In addition, the Board of Fisheries has given biologists the authority to locally regulate harvest. If Alaska is to have an abundance and diversity of game birds and small furbearers, the Division of Wildlife Conservation needs to develop similar capabilities.

The starting point is more and better information. Although the Division of Wildlife Conservation has many dedicated biologists, it unfortunately does not have the manpower or funding that is needed to inventory all species of wildlife, let alone big game, so that it can make more than an educated guess regarding the sustainable harvest for many species, particularly for local areas that have easy access and are more prone to hunting/trapping pressure. **Therefore, what KBCS would like to propose is that in order to supplement ADF&G effort, the BOG establish a stakeholder advisory committee that is charged with drafting a conservation plan for Kenai Peninsula game birds and small furbearers.** The purpose of this conservation plan is to assure optimal availability and diversity of wildlife resources, not to allocate between various users. The stakeholders appointed by the BOG should include Kenai Peninsula Fish and Game Advisory Committees, conservation organizations and other government resource management agencies, etc.. The principal objective of this collaborative effort should be a review of scientific studies as well as anecdotal information to determine if Kenai Peninsula game birds and furbearers have any localized areas of depletion.

If the review finds that there is insufficient data to determine populations, range and what should be sustainable levels of harvest, than the charge to the committee is to investigate other means for acquiring this data. Perhaps other agencies or organizations also have information or future projects that could add to the conservation plan. Or, knowing what information needs exist might attract research efforts by students seeking a meaningful project. Also, citizen science birding projects (e.g. Christmas Bird Count) now make a significant contribution to ornithological studies and the same principles could be applied to wildlife studies on the Kenai Peninsula.

Another objective of this effort is to have at least a summary of this data under one cover that is easily available to the public. Besides keeping the public abreast of ADF&G's knowledge on Kenai Peninsula game birds and furbearers, this information could result in BOG proposals that are based on more comprehensive information.

KBCS believes that establishing an Advisory Committee on Kenai Peninsula Game Birds and Small Furbearers is consistent with the actions the BOG has taken with other game issues and could make a locally significant difference is assuring that these species are sustainably managed, both locally and regionally, thereby assuring maximum use consistent with the desires of both the consumptive and nonconsumptive users. We recognize that the charge to the committee may need to be more detailed than what we have mentioned in this letter and would be pleased to assist in working out the details.

### **Proposal 118**

One proposal referred to above that we do want to make a specific comment on is Proposal 118. This proposal asks that the hunting season for Lesser Sandhill Cranes be closed in GMU 15C because of concerns about mortality due to predation, habitat losses, and hunting. Currently, harvest by hunters of Lesser Sandhill Cranes that migrate through or breed in GMU 15C is not well known. Consequently, we request the BOG to ask that the Harvest Information Program (HIP) provide more detailed data which lists harvest specific to the Lesser Sandhill Cranes that use the Pacific Flyway. Having flyway specific data is essential for a more accurate analysis of the impact that hunting has on this population of cranes.

### **Proposal 125 & 128 – Opposition**

The intent of both of these proposals is to allow the sale of black bear hides. KBCS considers this a back door approach to commercial hunting. In fact, Proposal 128 states that “selling the hides would provide another source of income for Alaskan residents.” KBCS opposes any attempt to privatize Alaska’s publicly owned wildlife resources, which would be the result if commercial hunting (or any proxy of commercial hunting such as predator control) were allowed.

As you well know, the Board of Game was created by statute “for purposes of the conservation and development of the game resources of the state.” As described in ADF&G’s “Hunter Education Independent Study Guide” the concept of wildlife conservation grew out of a concern by sportsmen in the late 1800s that many wildlife populations in North America were being threatened by commercial hunting. Teddy Roosevelt, one of the great icons of both sport hunting and conservation said; “The professional market hunter who kills game for the hide or for the feathers or for the meat or to sell antlers and other trophies; market men who put game in cold storage; and the rich people, who are content to buy what they have not the skill to get by their own exertions - these are the men who are the real enemies of game.”

Market hunters thought only of themselves, not “the greatest good to the greatest number” as championed by George Bird Grinnell, another icon in the embryonic days of conservation. Even today, when conservation is well established, there will always be those who put their own interests first and would like to make an extra buck by selling game trophies, hides, etc. This foot in the door approach will just create incentive and pressure for more opportunity to sell more trophies and hides, irrespective of its impact on wildlife populations. Any semblance of market hunting needs to be opposed by the BOG.

Furthermore, it is questionable whether any increase in black bear harvest on the Kenai Peninsula is sustainable. The BOG should note that total harvest for GMU 7 and 15 has sharply increased over the past few years; the 5 year average being 440 black bears. For the 2007/08 season, there were more black bears harvested (458) than moose (415).

### **Proposals 128-141 – Conditional Support**

These proposals seek to change regulations so that a brown bear hunt on the Kenai Peninsula is essentially assured.

Rather than comment on the variety of ideas brought out in these proposals, the KBCS wants to remind the BOG that ADF&G has a “Kenai Peninsula Brown Bear Conservation Strategy” which was published in June 2000. This strategy was the product of a comprehensive review by ADF&G and a stakeholder committee regarding Kenai Peninsula brown bears with emphasis on human-bear interactions. We think this Conservation Strategy should provide the basis for addressing these proposals. The Conservation Strategy does accommodate a hunt for brown bears if human-caused mortality from DLP’s and other causes is less than the annual sustainable harvest.

A key factor in this issue is the population estimate for Kenai Peninsula brown bears. KBCS recently had a membership meeting which featured ADF&G biologists who gave a detailed review of the assumptions used for the population estimate. As a result of this presentation, we believe that the population of brown bears is now higher than originally assumed and KBCS does support amending the Conservation Strategy to reflect more current information using more accurate assumptions. A revised population estimate will probably reveal that a carefully organized draw hunt for brown bears can be sustainable even with the recent increase in human-caused mortality. In fact, if properly directed, a hunt might harvest bears that would otherwise become DLP's, an idea that has already been worked out in detail by ADF&G. Hunting, combined with other programs underway on the Kenai Peninsula (e.g. bear-resistant garbage containers) should allow opportunity for hunters, reduction of human-bear conflicts, and healthy, sustainable populations of brown bears.

While we support having a hunt that is sustainable, we do not support removing the "species of special concern" designation that applies to the Kenai Peninsula population of brown bears. This has been suggested by some proposals. Not only is this an over-reaction, but fails to recognize why this designation was made and that some of the threatening conditions still prevail. The designation was made because Kenai Peninsula brown bears are "vulnerable to a significant decline due to low numbers, restricted distribution, dependence on limited habitat resources, or sensitivity to environmental disturbance." We think having the "species of special concern" designation has successfully drawn attention to the management of Kenai Peninsula brown bears and is partially responsible for healthy populations that now allow having a hunt.

Also, we do not support any proposal that is or serves as a proxy for a predator control plan. Evidence has shown predator control needs to reduce predator populations by as much as 80% to be effective. This we consider unacceptable. Attached is a survey we took of those who attended the meeting previously referred which demonstrates that many in the Homer area also support having healthy populations of brown bears on the Kenai Peninsula.

Furthermore, the fact that there is an antlerless moose hunt for GMU 15C (Proposal 151) to "improve overall browse quality" indicates that moose mortality due to bear predation may be compensatory rather than additive. The limiting factor for moose in the Homer bench area is winter carrying capacity, particularly in winters with deep snows as the past few winters have been.

We appreciate having this opportunity to provide input to the BOG in its consideration of proposals for Southcentral Alaska.

Sincerely,

  
Roberta Highland, President

## Kachemak Bay Conservation Society



### Kenai Peninsula Brown Bear Survey

Survey Response : 80 surveys were handed out and 76 returned.  
Note: not everyone answered each question to totals differ.

#### 1. Attitude about Kenai Peninsula brown bears

Attitude	Response
Enjoy bears	56 74 %
Enjoy bears but worry about problems	19 25 %
Do not enjoy bears	1 1 %
No particular feelings about bears	
Unsure	

#### 2. Importance of a healthy brown bear population

Importance	Response
Very	59 79 %
Quite	13 18 %
Somewhat	1 1 %
Not too	1 1 %
Not at all	
Unsure	1 1 %

#### 3. Attitude about Kenai Peninsula brown bear population

Bear Numbers Should...	Response
Increase	31 43 %
Stay the same	28 38 %
Decrease	4 5 %
No feelings	
Unsure	10 14 %

#### 4. Was tonight's meeting valuable to you in learning to live with bears?

Interest Level	Response
Very	29 41 %
Quite	24 33 %
Somewhat	19 18 %
Not too	5 7 %
Not at all	1 1 %
Unsure	

## Mat-Su State Parks Citizens Advisory Board

HC 32 Box 6706, Wasilla, Alaska 99654  
(907) 745-3975 Fax (907) 745-0938

ATTN: BOG COMMENTS  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Sent by fax to: 907-465-6094

Dear Board of Game:

RECEIVED  
FEB 11 2009  
BOARDS

At its regular meeting of February 10, 2009, the Mat-Su State Parks Citizens Advisory Board considered several regulatory proposals that we found would adversely affect the natural resources of Denali State Park (which includes the Indian River State Recreation Area), the safety of Park visitors, and the quality of visitor experience. The Indian River State Recreation Area is part of Denali State Park under the Denali State Park Management Plan.

Accordingly, oppose proposals 114, 75, 73, 74, 76, and 79 and respectfully request that the BOG deny them.

**Proposal 114:** We urge **denial** of this proposal because it would, if adopted, extend the unit 13 predator control area into Denali State Park. The intensive predator control program, which includes use of aircraft, is contrary to the Alaska Division of Parks and Outdoor Recreation's management objectives for the park, as stated in the Denali State Park Management Plan. Page 69 of the Plan states as a management goal to "eliminate practices, such as bear baiting, that are in direct conflict with recreational use of the park." And, on page 70, the Plan states: "Work with ADF&G and Board of Game to establish management practices that may lead to enhanced wildlife viewing."

**Proposal 75:** We urge **denial** of this proposal because it would, if adopted, allow the baiting of brown bear in Denali State Park, and thus represents a safety hazard to visitors to Denali State Park and would decrease wildlife viewing opportunities. Note that the part of Denali State Park that would be directly affected by this proposal is the Indian River State Recreation Area; if Proposal 114 is adopted, other parts of Denali State Park would be affected as well. It is inconsistent with the Division of Parks and Outdoor Recreation management objective for the Park. The Denali State Park Management Plan states on page 69: "Work with ADF&G and propose to the Board of Game that the park be closed to bear-baiting." The Plan (also on page 69) states as a management objective

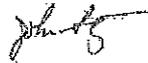
to "Avoid human-bear confrontations. Eliminate a hunting practice in the park that teaches bears to associate humans with food sources."

**Proposals 73 and 74:** We urge **denial** of these two proposals, both of which would extend the season of black bear baiting, because they do not provide a specific reference to the current prohibition of the "hunting of black bear over bait" (Alaska Hunting Regulations for unit 13) in Denali State Park, and do not make clear that the prohibition of baiting of black bears applies to the Indian River State Recreation Area or in Denali State Park..

**Proposals 76 and 79:** We urge **denial** of these two proposals because they both include all of unit 13E and neither one excludes Denali State Park. Increased hunting pressure is, as explained above, incompatible with the management objective of increasing wildlife viewing opportunities in the park.

Thank you for considering our recommendations.

Sincerely,



John Strassenburgh  
Co-Vice Chair

cc James King, Director, Alaska Division of Parks and Outdoor Recreation  
Wayne Biessel, State Parks Superintendent, Mat-Su / Copper Basin Area

RECEIVED TIME FEB. 11. 11:34AM

Public Comment #

114


 Fax and U.S. Mail  
 1-877-465-6094

Alison Cooke  
 P.O. Box 1561  
 Homer, AK  
 99603

February 11, 2009

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 FEB 11 2009  
 BOARDS

Alaska Department of Fish and Game  
 Boards Support Section  
 P.O. Box 115526  
 Juneau, AK 99811-5526

Re: Board of Game Proposal No. 118

Dear Fish and Game,  
Board of Game

I am an Alaska and a Homer resident writing  
 to support Board of Game Proposal No 118 that  
 would close the season on sand hill cranes in the  
 Kachemak Bay area or Homer Area (unit 15c).

The crane population is low and the numbers may not  
 be adequate to sustain the small population. The cranes  
 are long-lived but have very low productivity and  
 it would not be prudent to continue local crane  
 hunting without population surveys and harvest data.

We watch the cranes in the hay field next door  
 most of the summer and they have become habituated  
 to human presence. Tourists and locals often stop  
 to photograph "our" cranes. We really look forward  
 to their arrival each spring. I do not want  
 them shot. Please close the season on  
 hunting sand hill cranes in the Homer area.

Sincerely,  
 Alison Cooke

RECEIVED TIME FEB. 11. 11:52AM

Public Comment # 115

**Prince William Sound Charter Boat Association  
PO Box 2850 Valdez, AK 99686**

February 9, 2009

Alaska Dept. of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526

RECEIVED  
FEB 11 2009  
BOARDS

Attn: Board of Game Comments  
Re: Proposal 31

Greetings Board Members,

In our January 26<sup>th</sup> meeting our membership voted unanimously to support Proposal 31 changing opening day of black bear season in Unit 6D from September 1<sup>st</sup> to September 10<sup>th</sup>. Our membership is 25 plus members, 12 were at the January meeting and voted for this proposal.

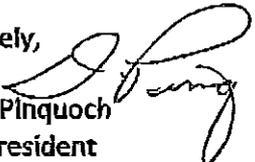
Some of our members are Big Game Transporters and this regulation change will have a negative financial impact on their charter income, however, we believe long term sustainability trumps short term gains. Additionally, the quality of black bear hunts will diminish with harvests that are unsustainable.

The increase in fall harvest is substantial and the percentage of sows being harvested in the fall is disconcerting. We assume the reason for increased sow harvest in the fall is because of sows who chased off their cubs are now legal and vegetation in the fall hinders cub visibility. We supported shortening the spring season from June 30<sup>th</sup> to June 10<sup>th</sup> not just to reduce harvest but also to leave the bears alone during the breeding season to promote maximum production of cubs. Supporting shortening the season in the fall has 3 benefits – reducing harvest, reducing harvest of sows and reducing the chances of sows being taken with cubs that are hidden by vegetation. It appears that shortening the season 10 days in the fall will provide maximum benefit for bear population sustainability by specifically lowering sow harvest.

The past couple years most of our resources have been dedicated to halibut issues. Because of this we may not have a representative at the Board of Game meetings to testify this cycle. If for some reason you would like information from our association, I am the designated Board of Game issue representative and would be happy to help any way I can.

Keep up the good work!

Sincerely,

  
David Plinquo  
Vice President  
Prince William Sound Charter Boat Association  
David's cell (907) 715-7447

Alaska Dept. of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526

Re: Proposal 31 – Support  
Proposal 30 – Support with amendment  
Proposal 29 – Neutral?

Hello Gentlemen,

My name is David Pinquoch. You will also see my name on a letter of support for Proposal 31 from the Prince William Sound Charter Boat Association. I have operated a charter business from Whittier since 1991 and offer boat based hunts for black bear and deer.

**Proposal 31 – delay the opening date for black bear season in Unit 6D from Sept 1 to Sept 10.** It is time to pass this proposal. It would be beneficial for me if this regulation was delayed to 2010, although I have a contingency plan in place should the proposal pass and go into effect in 2009.

A few years back, possibly the last cycle, Fish and Game (Dave Crowley) proposed the same regulation change. As a Big Game Transporter that relies heavily on black bear hunts in western Prince William Sound I testified against changing the season dates as the first week of September had become the best quality hunt I offered, partly because of the lack of other hunters. The Board voted the measure down which I certainly appreciated at the time.

Things have changed since then. As David Crowley, area biologist has shown, the harvest in the fall has risen 4 fold since 2005 and many times more than that since 2000. The percentage of sows being harvested is disproportionate compared to the spring which makes continued harvest at this rate worrisome. The high percentage of non-resident hunters indicate to me that Big Game Transporters are likely part of the reason for the fall harvest increase and what I have witnessed supports that. Sustainability is paramount for Big Game Transporters and if we have to be restricted to help ourselves long term, I'm all for it.

**Proposal 30 – One bear every two years.**

**Amended - One boar annually or one sow every two years.**

**(If a sow is harvested the hunter cannot hunt the next year for boar or sow)**

I have considered one bear every two years and I don't oppose it. With the amendment I suggest it may allow a larger total harvest yet help with the total population by reducing sow harvest. There would be more incentive to not harvest sows. This would be somewhat similar to each nanny goat counts as 2 goats in registration hunts which restricts all hunters. Having the one sow every two years would restrict only the hunters that kill sows, rather than restricting all hunters.

**Proposal 29 – wounded bear counts as a harvested bear.**

This proposal gives me heartburn. I've listened to other people who call themselves hunters and have heard comments that indicate if a wounded bear counted as a harvested bear that it would be almost impossible to get caught or to be enforced. I have to agree. This leads me to a different conclusion than Mr. Jennen, the author of Proposal 29. He indicates those who would benefit would be ethical hunters and those who would suffer would be those who choose to shoot multiple bears. I see it exactly the opposite. Only ethical honest hunters would suffer as their hunt would be over, while unethical hunters would continue to hunt.

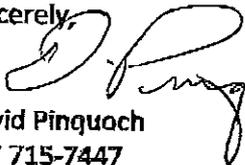
Would this regulation reduce harvest?

In almost 20 years of offering unguided bear hunts I only recall one hunter who wounded a bear and then shot a second bear. He, in fact, wounded a second bear. I doubt this a good representation of hunters in general though, as I screen my hunters and those who just want to kill something often don't go with me.

The way this regulation would probably provide the most benefit is that hunters may wait for a better shot and thus wound less bears or harvest less bears because they couldn't get a good shot. If this turned out to be the benefit of the regulation I certainly support it.

Do I support this proposal? Only if the Board feels most hunters would abide by the regulation and agree with the benefit potential of less wounded bears by hunters because they would be more cautious with shots.

Sincerely,



David Pinguoch  
907 715-7447

RECEIVED

FEB 11 2009

Comments

BOARDS

*Janie Cl Wrentmore*

To: Board of Game

By: Jan Wrentmore, Skagway Alaska

Date: February 11, 2009

Subject: Support for Proposal 224 relating to Protection of Light-Phase Black Bear within the Municipality of Skagway

First, I would like to thank the Board for giving this matter their time and attention. The Skagway Spirit Bear is a heartfelt and somewhat complicated issue and the fact that the Board has been willing to give it its full consideration builds good will for the Department and for the Board within the community. I also appreciate the time staff has put into this issue and their efforts through discussions with former Skagway Mayor Tim Bourcy to find enforceable language for this regulation.

I support the John Warder proposal and urge you to adopt the following language:  
**"Ban the hunting of any black bear that is not black or very dark brown."**

I would like to point out that the **Municipality of Skagway has been on record asking for protection of white-phase black bears since 2007.** It was very unfortunate that this past summer the bear which prompted the Municipality's petition to the Board, was the existing regulation proved unenforceable. However, this past summer a small first year light-phase cub was frequently seen.

The proposed regulation would have a very limited effect on bear hunting within the Municipality of Skagway. Of the black bears shot within our boundaries in the last 10 years, only the bear which the Municipality attempted to protect was considered a glacier bear. Such a small percentage of bears does not seem to be an unfair request in terms of allocation of the resource. Skagway is a community which depends almost entirely on tourism and as such has a very large population of people who would be classified as a "non-hunting user group." The visitors, locals, children and photographers who cherished their sightings of the white bear deserve to have this small percentage of the resource allocated to their viewing pleasure.

I am attaching to my comments a copy of the City's original petition to the Board as well as a copy of the recent Skagway News which features a lengthy article about the meeting in Skagway in January conducted by Department staff Ryan Scott. While it was a commendable effort on the Department's part to schedule an opportunity for public input at the community level, it was unfortunate that certain hunters were allowed to heckle individuals in the group who supported the regulation. A number of individuals who supported the regulation did not speak out for fear of being verbally attacked by the hunters.

RECEIVED TIME FEB. 11. 12:21PM

Public Comment # 117

RECEIVED  
FEB 11 2009  
BOARDS

February 10, 2009

Dear Board of Game Members,

As we are traveling overseas at this time we have asked our friend Jan Wrentmore to transmit to you our support for the ban on hunting of "any black bear that is not black or very dark brown within the Municipality of Skagway."

As year-round residents we enjoy tremendously the viewing opportunities these bears have afforded us.

Thank you,

*JCF*  
*for*

Susan Fredricks  
Lynn Cameron

RECEIVED TIME FEB. 11. 12:21PM

Public Comment # 117



City of Skagway  
Gateway to the Gold Rush of "98"  
P.O. Box 415, Skagway, AK 99840  
Phone: 907-983-2297  
Fax: 907-983-2151  
[www.skagway.org](http://www.skagway.org)

RECEIVED

FEB 11 2009

BOARDS

## Petition to the Alaska Board of Game

RE: **Closure of hunting season on white-phase black bears in the Skagway area.**

Per Section F of 5AAC 96.625 the City of Skagway requests this change for the following reasons:

An emergency situation has developed. For the third consecutive season, a rare white-phase bear cub accompanied by its mother (black phase) and sibling (brown phase) are frequenting the Skagway valley. The rare white-phase cub, known locally as the "Spirit Bear" is at risk of being shot as soon as it leaves its mother. As it is unusual for a cub to remain with its mother for three full seasons, it is anticipated that the cub will soon be on its own and eligible to be taken by hunters. Accordingly, we request the Board of Game address this issue immediately to grant protection the white bear rather than waiting until the next regional meeting.

Since 2005, this bear has been observed, photographed and enjoyed by the residents and visitors of this town, in particular the school children. The cub, which is creamy white with light brown ears, has been the subject of school field trips and the inspiration for a research project by the elementary school children. As a resource it is extremely valuable to a segment of the public that desires that this bear be protected. Records by local wildlife observers indicate that a bear of this color has never before been identified in this area. Due to the intensity of hunting pressure on this rare of a bear, residents are concerned that the bear will not be allowed to live and pass its unique genetics to another generation.

Of note are the two following closure precedents: a prohibition on the taking of white-phased or partial albino moose in Unit 20(C) and a prohibition on the taking of white-phased black bears in Unit 1(C). Precedent has been set for protection of individual animals within a wildlife population. We believe the white bear in the Skagway valley constitutes a unique and valuable wildlife resource and as such is worthy of protection.

Thank you for considering this request.

Tim Bourcy

Mayor City of Skagway

1

# THE SKAGWAY

Serving Skagway & Dyea, Alaska

VOL. XXXII, NO. 1

JANUARY 23, 2009

## Bear proposal divides Skagway

### Meeting with Fish & Game inconclusive about proposal to protect the next "Spirit Bear"

By ANDREW CREMATA

Is it possible to protect the animal in Alaska? How does one define an issue as subjective, its color? Does everyone have the right to enjoy a particular resource, and how is that enjoyment defined? Tackling broad questions such as these will ultimately determine the outcome of a proposal by a Skagway resident seeking to protect one particular unusually colored bear.

A certain bear frequently seen roaming the hillside in Skagway from 2006 to 2008 became the talk of the town and of serious interest to local wildlife enthusiasts and photographers alike. Some claimed the unusually colored bear was white, cream-colored, a glacier bear, a white-phased black bear, and even a "Spirit Bear." All were attempts to define what was perceived as a rarity for Southeast Alaska.

Protection for the bear was sought and granted in 2007 by the Alaska Department of Fish and Game after the municipality drafted a proposal urging them to protect the "white-phased black bear." However, the language of the final document called for the protection of a "white-colored bear."

When a bear was shot on June 5, 2008 by Thor Henriksen on his property, state officials examined the hide and concluded it was not a white bear and no charges were laid.

Many in town drew conclusions the bear shot was the bear designated for protection. Henriksen maintained the bear he shot was a cinnamon bear. He said he had been scared by bears the previous summer and had determined he would shoot one causing trouble on his property during hunting season. Henriksen said the bear had looked straight at him and lowered his head.

Since the taking of the bear by Henriksen, the unusually colored bear has not been seen.

Another proposal, drafted by John Warder, was presented to the Board of Game in November. The proposal calls for the protection of "a light-phase black bear that has cream coloration (or lighter) over more than 30% of its body."

Many at the meeting felt such a law would be unenforceable, or put an unrealistic burden on hunters.

The appearance last summer of another light colored bear cub left many locals wondering if the proposal could, or would, be adopted.

Approximately 60 of those persons met at the AB Hall on January 10 along with Division of Wildlife Conservation representative Ryan Scott.

"I suspect it's not going to be very quick," said Scott at the start of the meeting.

Scott described the process by which the ultimate determination on the proposal would be made, explaining that comments would be heard by the Board of Game at its next meeting on Feb. 27-March 9 of this year.

He said there was currently no recommendation from F&G on Proposal 23 and he was sent to Skagway to "get something more concrete" concerning what was considered to be an allocation issue between consumptive and non-consumptive user groups.

Scott said the unusually colored bears were considered black bears by the department, and that the issue did not matter biologically. He said bears were managed as such.

RECEIVED TIME FEB. 11, 12:21PM

# NEWS

Published Twice Monthly (once in Jan)

\$1

Public Comment # 117

From page 1

Scott said the problem in defining a percentage of color on an animal is that it's "an estimate at best."

"Which one comes in do we count hairs?" he added.

Noting the fact there may be social issues to consider, Scott opened the floor to comments or "the nitty gritty." He said any proposal to protect the bear would ultimately have to be creative.

Keith Khorr was the first to comment and said any colored bear was a "predator" that wouldn't care when they slaughter humans. He said it was matter of time before a tourist was slaughtered and the only way to remain safe around bears was to put them in a zoo or "shoot them."

Scott said Skagway had done a great job addressing bear protection "and did it quickly." He said 99 percent of the time problems exist because of attractants such as food.

Larry Piore said the newly seen unusually colored bear cub had already been in a dumpster, was already a safety hazard, and would create another generation of problem bears.

Jan Wrentmore said the issue was protecting light-colored bears from hunting. She added anyone threatened would not be allowed to protect life and property.

Khorr interjected by saying that's why they tried to shoot Thor (Henricksen) because he was protecting his own property.

Scott confirmed that nothing in Proposal 23 would preclude shooting any bear for protection.

Luke Rauscher said hunting would not be good and asked how it would affect subsistence and safety.

Scott said the boundaries of protection should be limited. This shouldn't go long," he said.

Tim Cochran reasoned he was not for wanton killing of animals, but bear populations had increased dramatically in Skagway since the 1960s. He said the issue should be handled in a humane way but added "We have a bear problem."

Cochran said population was ultimately the defining problem. "People are feeding them," he said.

Scott said progress had been made as there was an obvious difference of opinion concerning hunting bears and protecting them. "Let's keep it that way," he added.

John Trorrud said the unusually colored bear shot by Henrickel was a "victim of circumstance." The 800,000 visitors to Skagway each year created too much garbage for the infrastructure to hold, explained Trorrud. He said the ultimate issue was not color but food being made available to bears.

Wrentmore said unusually colored bears were a draw for tourists. She said there should be balance between user groups, and balance could be attained by protecting one bear among many still available for hunters.

In a handout offered to attendees from Scott, Skagway area harvest of

3

## BEARS: Hunters get their say, others want protection

Black bears from 1998 to 2007 included 20 black bears, five cinnamon bears, and one glacier bear.

Interestingly, Scott noted the "glacier bear" listed was the bear harvested by Henriksen. This is an apparent reversal of the original finding by F&G the bear was multi-colored.

STIS student Mickey Wilson asked Scott whether there were any bear attacks in Skagway ever reported. Scott answered there were none.

Emily Raucher addressed Wilson and said if it happened once it would be a "big deal."

Knorr said if someone were to be killed by a bear, "I don't think Jan (Wrentmore) will stand up and say, 'I'm one of the ones protecting it. Someone should take responsibility.'"

Student Shelby Surdyk argued the issue was not one of hunting, non-hunting, or problem bears, but rather the issue was allocation. She said the bears were valuable to Skagway youth, who prized the possibility of viewing such a rare animal.

Mavis Henriksen said, "If we protect white bears, eventually that's all we'll have around here."

Thor Henriksen, read from a written statement and said, "white bears do not exist in this part of Alaska." He said people exaggerated the nature of the bear, and Skagway was not a game refuge.

He said pets were required to have licenses so the owners would be responsible and suggested those seeking protection for certain bears should have the animals collared and licensed to themselves.

Wrentmore said such animals are a "trophy," and if F&G was seeking fairness in allocation, they would give us this. She said 50 percent of people were asking to protect the bear.

Warder said, "I'm the guy who wrote the draft proposal," and that even though he was a hunter, the light-colored bears were important to other user groups, besides hunters.

Knorr suggested providing Wrentmore with a gallon of bleach with the purpose of making "all the white bears she wanted."

Greg Black said the resource allocation was fair as 50 people got to take a picture of the unusually colored bear but "only one got to shoot it."

Theresa Brown said hunters already had to be diligent in regards to paying close attention to restrictions, and wondered how it would be any different in regards to definitions of bear color phases.

He was concerned there



A mother black bear and her three cubs, including one glacier bear, scatter from a hillside home last summer.

Cynthia Trohrud

would be more restrictions for hunters citing the inability to hunt grouse at Lower Dewey Lake and bears in spring when they taste good.

Later it was noted by the Borough Assembly that there are no restrictions on hunting around Lower Dewey Lake.

Knorr addressed the assembly in Thor's defense by saying Henriksen was protecting his property when he shot the bear in question. He said Henriksen was originally going to have the bear mounted and donated to some local entity such as the museum, but now his attitude was, "I hope nobody ever sees it."

"You guys need to meet him halfway," said Knorr. "You guys are pissing in everybody's Cheerios."

Scott said the opinions expressed would be helpful to the Board of Game. He said even if there was no consensus, "We've still taken positive steps."

Scott said the board would make a final decision, as it was the third time the issue had been addressed.

Comments concerning the issue can be sent to F&G no later than Feb. 13. Comments may be mailed or faxed to the following location: ADF&G Boards Support Section, P.O. Box 115526, Juneau, AK 99811-5526; faxed to 907-465-6094; or e-mailed to Kristy\_Tibbles@fishgame.slate.ak.us.

**St Louis, Rita G (DFG)**

**From:** Lynn Rogers [lrogersb@gmail.com] on behalf of Lynn Rogers [lrogers@bearstudy.org]  
**Sent:** Wednesday, February 11, 2009 12:27 PM  
**To:** St Louis, Rita G (DFG)  
**Subject:** Support protection of bears in 9C

**PROPOSAL 43 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Close brown bear hunting in a portion of Unit 9C as follows:  
Funnel Creek, Moraine Creek, and Battle Creek

**SUPPORT**

I have conducted bear research for the University of Minnesota, Wildlife Research Institute, and the United States Forest Service for 42 years. I worked with the Minnesota Department of Natural Resources and the Minnesota State Legislature to elevate bears to big game status in Minnesota. I wrote the initial bear hunting regulations for Minnesota. I support hunting but do not consider shooting bears in Katmai Preserve to be hunting. It casts a horrible shadow on hunters and is detrimental to bear viewing.

I have been guiding bear viewers to Alaska since 1996, and the idea of hunters unethically shooting the same trusting bears that the viewers come to see makes viewers furious. Maybe you have heard from some of them. People can hunt all over Alaska, but Katmai is special. It is a world class wildlife opportunity, and income from viewing those bears supports a lot of jobs. There is no good reason to kill that golden goose, and there are many reasons to stop this unethical "hunt."

Please protect the bears in 9C.

Lynn Rogers, Ph.D.  
Wildlife Research Biologist  
Director, North American Bear Center  
Founder, Wildlife Research Institute  
1482 Trygg Road  
Ely, MN 55731  
218-365-4480  
lrogers@bearstudy.org  
www.bear.org

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FEB 11 2009  
BOARDS

Carol Jensen  
10821 Baronik Street  
Anchorage, AK 99518-1724  
Email: busface1999@yahoo.com  
Phone: 907-244-1979

February 11, 2009

2 pgs. total

State of Alaska  
Board of Game  
Fax #907-465-6094

RE: Proposals for Feb 27-March 9, 2009 Meeting

Please include the following comments in the Board's binders:

I understand there are several proposals that would expand the predator control programs in the State. I am opposed to every one of them.

I have seen predator control programs taking place in Alaska since my arrival in 1973. None of them have produced anything but very short-term positive results for ungulates. They have all been based on unscientific grounds, little or no field investigations and documentation and no biological necessity or grounds. Surveys are based on unreliable hearsay and office computer generated simulations. Track counting is very unreliable. Guesstimates of predator species are inflated to the point where hunters and trappers cannot find and kill anywhere close to the unrealistically high numbers the Department spews. Guesstimates of ungulates are underestimated and the population goals are set at unrealistically high numbers that cannot be supported by the habitat.

More often than not human hunting, habitat, weather and disease have been the main contributing factors to **alleged** ungulate population reduction. Human hunting and trapping has continued in predator control areas. The incidental take of prey species in trapping is not considered. The rampant illegal taking of prey species is not considered. The number of moose calves who die as a result of their mother being killed is not considered. The number of cubs killed by male bears is not considered.

The proposal to kill wolves near Anvik has no supporting evidence or population estimates for wolf numbers in the area!

The use of aerial hunting is cruel and opposed by most Alaskans and people throughout the country. The use of torturing and killing wolf pups (denning) and bear sows and cubs is thoroughly disgusting and inhumane.

Allowing out of state hunters to come in and destroy our bear population by having an unlimited harvest allowing the sale of hides is unspeakable! We cannot allow our bear population to become endangered by commercial means. Have you forgotten how long it takes bears to rebound?

Board of Game

Page 2

February 11, 2009

The entire predator control program is simply a political arena. It is not necessary to maintain subsistence hunting. It certainly should not be used so greedy urban and out of state hunters can take more moose and caribou for their gourmet tastes, living room walls, and commercial use.

We all know the Board of Game has always been heavily weighted in favor of hunters and trappers. However, a substantial number of hunters and trappers oppose the extremes that predator control is going to. A majority of Alaskans would certainly be opposed to poisoning pups in dens and trapping bear sows and cubs. It's time to show the State and the rest of the country that this is NOT a state run by ignorant barbarians that continue to ignore science and sound wildlife management.

Thank you for your time and consideration.

  
Carol Jensen

9FEB2009

Alaska Dept. of Fish and Game, Boards Support  
PO Box 115526  
Juneau, AK, 99811-5526

RECEIVED  
FEB 12 2009  
BOARDS

RE: proposal to restrict bear hunting in Skagway according to bear coat color

I support John Warder's proposal to modify the bear hunting regulations for the borough of Skagway so that black bear hunting is restricted to bears with "black or very dark brown" coat color. This adjustment is designed to protect the "spirit bear" or "glacier bear" colored bears, which are rarely seen in the Skagway area, from routine hunting. The restriction will in no way affect any property owner's ability to protect their lives or property if threatened by a bear.

Support for protection of these special bears from routine hunting in the Skagway area includes many town residents, summer visitors, the local Tlingit tribe, wildlife photographers, tour excursion businesses – all of those for whom the special experience of viewing a rare bear includes allowing people the opportunity to continue to view that bear in the future.

Recent experience has shown that although the ADF&G uses the designation of "glacier bear" when reporting bear harvest statistics, it cannot adequately define the term for regulatory enforcement incidents. The very light colored bear shot in Skagway last year was listed as "glacier bear" in ADF&G reports; but when evaluating the shooting incident, ADF&G could not categorize the bear color.

If categories such as "glacier bear" have been shown to be inadequate for regulatory actions, ADF&G's descriptive terminology for coat color should be used. Black bears exhibit coat colors on a continuum from black to white, therefore bear coat color cannot be absolutely pinned to any descriptive term. Restricting hunting to "black or very dark brown" bears will still allow hunting of bears with coat colors near the lighter, mid-range of descriptive terms, but should prevent the killing of bears at the very light, far end of the continuum.

I would also like to ask that ADF&G become more involved with the separate issue of bears becoming habituated to human food in the Skagway area. Overflowing or easily opened garbage cans, both private and municipal, are very common sights in Skagway. It is not surprising that some bears become habituated and turn into problem bears. At present, this situation is managed by waiting until the bears are shot while searching for food on someone's property. Instead, steps could be taken to better manage the bears' access to human food, and avoid the development of habituated bears.

Sincerely,



C. E. Furbish  
PO Box 1076  
Skagway, AK 99840

February 10, 2009

RECEIVED

Alaska Dept of Fish and Game  
Boards Support  
PO Box 115526  
Juneau, AK 99811-5526

FEB 12 2009

BOARDS

Dear Board Members:

I was the author of "Proposal 23" at your meeting in Juneau last November, trying to protect a rare cream-colored bear in our borough. A decision on that proposal was deferred until your meeting in Anchorage at the end of this month and is now listed as "Proposal 224", I believe.

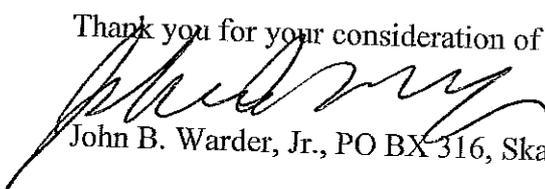
I would like to amend my original proposal to read that you "Ban the hunting of any black bear that is not black or very dark brown" (language I suggested in #7 of my original proposal), and to narrow the scope of the change to affect only hunting in that portion of Game Management Unit 1D which lies within the boundaries of the Skagway Borough.

The reason behind this is the difficulties you had in your November meeting in writing an enforceable regulation and my desire not to have the change affect all of Unit 1D, just the Skagway Borough. I do not believe there is any enforceable definition of "glacier bear" either, even though they are referred to many times in the current hunting regulations, so I don't want to use it in the new language for the same reasons. Presently hunters must make all kinds of calls in the field regarding antler size, horn curl, or sex of their targeted game animal and this suggested restriction shouldn't be any more difficult for them than those on the books already. When in doubt, the hunter does not shoot.

This proposed change would have little affect on the harvest of black bears in the Skagway Borough. According to Fish and Game Biologist Ryan Scott, only 26 black bears have been taken in the borough in the last ten years. Of those, 20 were black phase, 5 were cinnamon phase and only one was a glacier bear, which most likely was the very same bear we had asked be protected by regulation in 2007.

The Skagway Borough has almost a million visitors a year to a small town of less than 900 people. They come here to enjoy the vacation they have dreamed of much of their lives. They take videos and photos of the historic buildings, the scenery, and our wildlife. A large segment of our local population is also committed to protecting this rare color phase of black bear and we all deserve the same consideration as our hunting population in your deliberations. I urge you to adopt these changes for our borough.

Thank you for your consideration of my proposal.

  
John B. Warder, Jr., PO BX 316, Skagway AK, 99840

RECEIVED  
FEB 12 2009

BOARDS

54618  
Stkasway, Alaska 99840

February 8, 2009

HK. Dept. of Fish & Game  
Boards Support  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Members of the Game Board,

I would like you to please consider changing the wording of Proposal 23 from "protecting white phased black bears" to "banning the hunting of bears that are not black or very dark brown in the municipality of Stkasway."

I saw Stkasway's light phased black bear, the one we were calling "the Spirit Bear," only once and that was four days before he was shot by my neighbor. The bear was in Long Bay and eating vegetation alongside the road. I was thrilled!

I'd never seen a bear his color and am a lifelong Alaskan. When I heard the bear had been shot, I felt a treasure had been usurped from local residents and tourists alike. Whereas, all could have enjoyed seeing such an unusual bear, now only one, the hunter, will. Please change the wording of Proposal 23 so that light phase black bears will indeed be protected in the future. Thank you.

Sincerely,

Deborah Boretcher

Bill Sherwonit  
2441 Tulik Drive  
Anchorage, AK 99517  
907-245-0283 akgriz@hotmail.com

RECEIVED  
FEB 12 2009  
BOARD

Feb. 9, 2009

ATTN: BOG Comments  
Alaska Department of Fish and Game  
Boards Support Division  
P.O. Box 115526  
Juneau, AK 99811-5526

Members, Board of Game:

Please consider my comments below in your upcoming deliberations:

In GMU 14C:

Proposals 1 through 4. I ask the Board to reject any and all proposals that establish or extend brown bear hunting opportunities in Chugach State Park. The hunting of brown bears is inappropriate in Chugach Park. And although the Department of Fish and Game cites bear-human conflicts in nearby Anchorage as one reason to add new hunts, Rick Sinnott himself admits that there's no assurance at all that such hunts will affect bear-human relationships in Alaska. To quote him: "It's a stab in the dark, really." And it's a stab that shouldn't be made.

Proposals 20-28. I support all the proposals that further restrict trapping activities in Chugach State Park, which I believe is an inappropriate place to allow recreational trapping. In particular, I strongly urge the Board to reverse its decision to allow the trapping of wolverine in Chugach State Park and I strongly support Proposal 27, which the Board will note is jointly submitted by the Alaska Departments of Fish and Game and Natural Resources. Opening Chugach to wolverine trapping was a mistake and the Board now has the opportunity to reverse that mistake. As the Board knows, local residents overwhelmingly oppose wolverine trapping. I would also support those proposals that prohibit the trapping of lynx and coyotes. Again, this is no place for such an activity.

In GMU 9:

Proposals 42-45. I support any change in the fall bear-hunting season that reduces conflicts between bear viewers and hunters, whether it's a delayed season or a local closure in the Funnel-Moraine-Battle Creeks area. The time has come to address this ethically challenged hunt of human-habituated bears and the conflicts that have increased since the BOG moved the start of the season from Oct. 12 to Oct. 1 several years ago.

In GMU 13, specifically that portion of 13E that includes Denali State Park.  
Proposal 114. My understanding is that this proposal, if approved, would move the predator control boundary into Denali State Park. Predator control activities are highly

Public Comment # 123

inappropriate for Denali State Park (or any state or federal park, for that matter). Please reject this proposal.

Proposal 75. If approved, this proposal would allow the baiting of brown bears in Unit 13. I strongly oppose the baiting of brown bears for any number of reasons, but I am especially concerned that baiting, under this proposal, might be allowed in Denali State Park. This is totally unacceptable behavior in a park (and I would argue unacceptable behavior anywhere in Alaska, for both safety and ethical reasons).

Proposals 73-74. I oppose the extension of the bear-baiting season and I am particularly concerned that there is no mention of the ban (already existing) in Denali State Park. I ask the board to reject these proposals.

Proposals 76 and 79. I oppose any increase of brown bear bag limits in Unit 13. There should certainly be an exclusion for Denali State Park. Please reject this proposal.

Unit 16, Proposal 189. The state's kill-any-black-bear program is awful enough without helicopter-assisted "hunts." Please reject this.

Finally, regarding Proposal 190, which asks the Board to review its management options. All I can say is: ADF&G has got to be kidding. All of these are bad ideas that should be rejected.

Thanks for considering these comments,



Bill Sherwonit

Proposal 42 SAAC 85.020 Do not support

I have seen a dramatic increase in bear populations in unit 9 in the last 10 years. Brown Bears do not need further protection.

RECEIVED

Proposal 43 SAAC 85.020 Do not support

FEB 12 2009

I have seen a dramatic increase in bear populations in unit 9 during the past 10 years. Brown Bears do not need further protection in this unit.

Proposal 44 SAAC 85.020 Do not support

I have seen a dramatic increase in bear populations in unit 9 during the past 10 years. Brown Bears do not need more protection in this unit. Brown Bears are having a negative affect on moose populations.

Proposal 45 SAAC 85.020 Do not support

I have seen a dramatic increase in bear populations in unit 9 during the past 10 years. Brown Bears do not need more protection in this unit. Brown Bears are having a negative affect on moose populations.

Proposal 46 SAAC 85.020 Please support.

I have seen a dramatic increase in bear populations in unit 9 during the past 10 years. Brown Bears are having a negative impact on moose populations and caribou calves.

Proposal 47 SAAC 85.020 Please support

I have seen a dramatic increase in brown bear population in unit 9 during the past 10 years. Brown bears are having a negative impact on moose & caribou populations.

Proposal 49 SAAC 92.125 Please support

I have seen a increase of brown bears populations in unit 17 over the past 10 years. Brown bears are having a negative impact on moose and caribou populations,

Proposal 50 SAAC 92.125 Please support

I have seen a increase of brown bear populations in unit 17 over the past 10 years. Brown bears are having a negative impact on moose and caribou populations

Proposal 51 SAAC 85.020 Do not support

I have seen a increase in the brown bear populations in unit 17 during the past 10 years. Brown bears do not need more protection in this unit. Brown Bears are having a negative affect on moose and caribou populations

Proposal 52 AAC 85.020 Please support

I have seen a increase in brown bear populations in unit 17 during the past 10 years. Brown bears are having a negative impact on moose and caribou populations

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Proposal 59 SAAC 85.045. Do not support

Hunters have been hanging moose antlers ~~for~~ more than 50 years. If the goal is to reduce trophy hunting limit the use of commercial services for this hunt.

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Proposal 64 - SAAC 85.056 Do not support.

predators are having a negative impact on federal land to moose and caribou populations. Wolves do not require further protection to maintain healthy populations in unit 9B. Moose and caribou populations are in danger and need any protection from these predators they can get.

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Proposal 65 - SAAC 92.125 Please support.

Predators are having a negative impact on the moose and Caribou populations in unit 9.

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Proposal 67. Do not support

Predators are currently having a negative impact on moose and Caribou populations in unit 17. wolves do not require more protection to maintain healthy populations.

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Proposal 68 SAAC 92.125 Please Support

Predators are currently having a negative impact on moose and Caribou populations in unit 17

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Proposal 69 SAAC 92.125 Please Support

Predators are currently having a negative impact on moose and caribou in unit 9 & 17.

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Proposal ~~77~~ Do not support Bears do not need more protection

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Proposal 78 Do not support Brown Bears do not need more protection

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Proposal 112 SAAC 85.056 Do not support Wolves do not need more protection

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Proposal 113 SAAC 92.125 Do not support wolves do not need more protection

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Proposal 174 SAAC 85.020 Do not support Bears do not need more protection

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Proposal 186 SAAC 85.056 Do not support wolves do not need more protection in 16B

Proposal 187 SAAC 92.125d Please support. Wolves and bears have had a negative impact on moose populations. This proposal will eliminate confusion with the boundary.



**United States Department of the Interior**  
**NATIONAL PARK SERVICE**

Alaska Region  
240 West 5<sup>th</sup> Avenue, Room 114  
Anchorage, Alaska 99501

IN REPLY REFER TO:  
L30 (AKRO-SUBS)

February 11, 2009

Mr. Cliff Judkins, Chairman  
Alaska Board of Game  
Board Support Section  
P.O. Box 25526  
Juneau, Alaska 99802-5526

Dear Chairman Judkins:

There are a large number of proposals before the Board of Game that affect or have the potential to affect National Park Service (NPS) areas in the state. We appreciate your consideration of our comments.

As you have heard from the NPS in the past, our mission and mandates differ from the State of Alaska and other Federal agencies, and may require different management approaches consistent with NPS enabling legislation and the Alaska National Interest Lands Conservation Act (ANILCA). With that point in mind and to offer important clarity to others involved in this process, we have appended a December 19, 2006 letter from the Department of the Interior, to the Chair of the Eastern Interior Regional Advisory Council, which addresses issues raised by a number of the individual proposals before you for consideration. Consistent with this letter and others the NPS has written to the Board in past cycles, we offer our comments asking that NPS areas be excluded from any regulations you may authorize that implement intensive management objectives in general hunting regulations. We recognize and appreciate previous Board actions that have not authorized predator control on NPS managed lands unless approved by the NPS (5 AAC 92.110 (j) and 5 AAC 92.115 (h)).

NPS is concerned about proposals that are designed to decrease brown bear populations in regions that include National Preserve lands. We are also particularly concerned about expansion of bear baiting, because NPS has a long history of trying to prevent habituation of bears to food rewards, both to protect bears and for visitor safety. Feeding wildlife is incompatible with park visitor use and with NPS regulations and policies.

Our comments to specific proposals follow:

**Proposal #42: Modify Opening Date (Affects: KATM<sup>1</sup>) (GMU 9C)**

<sup>1</sup> KATM refers to Katmai National Preserve

This proposal would change the opening of the fall brown bear hunting season in GMU 9C, specifically in Uniform Coding Units (UCUs) 702 and 703 within Katmai National Preserve, from the current date of October 1 to October 15. The NPS has long supported moving the opening of the season to October 7 as it was prior to 1999, with the season closing date of October 21 remaining unchanged. We believe that delaying the season opening date would increase the likelihood that bears will have dispersed away from salmon streams and help limit instances in which hunters take bears over carcasses of previously harvested bears (which has contributed to harvest in recent years). The season would still provide many opportunities for hunters.

The NPS continues to support development of a comprehensive brown bear management plan for GMU 9C. A comprehensive planning process would bring together stakeholders to discuss the many issues surrounding brown bear management including seasons and harvest limits.

**Proposals #43: Oppose (Affects: KATM) (various drainages in GMU 9C)**

This proposal would close the Funnel, Moraine and Battle Creek drainages inside Katmai National Preserve to brown bear hunting. The available data does not support the closure.

**Proposal #44: Support with Modification (Affects: KATM) (GMU 9C)**

This proposal seeks to establish a drawing permit hunt for brown bears in the “remainder” portion of GMU 9C within Katmai National Preserve. The NPS supports this proposal with the modification that the brown bear hunt be administered by registration permit rather than drawing permit, with a short sealing period so that the hunt can be more closely monitored.

In 1991 ADF&G (Sellers) recommended an allowable sport harvest of brown bears in GMU 9C of 7-9 bears per calendar year or approximately 14-19 bears every two years. Between 1985 and 2002, the average two-year harvest in the Preserve was approximately 14-19 bears (State sealing data). The 2003/2004 harvest increased to 42 bears and the 2005-2006 harvest increased to 36 bears. This is approximately double the 14-19 bears recommended by ADF&G in 1991.

Section 202(2) of ANILCA provides that the Park and Preserve are to be managed for “high concentrations of brown/grizzly bears and their denning areas...” The NPS is concerned that the current trend of increasing brown bear harvests in Katmai National Preserve cannot be maintained over the long term, consistent with that management directive. Implementing a registration permit hunt in UCUs 702 and 703 would enable closer management of the hunt to account for changes in bear numbers and hunter effort while maintaining opportunities for high quality brown bear hunts.

**Proposal #45: Oppose (Affects: KATM) (Remainder GMU 9C)**

This proposal would eliminate the fall season for brown bear in the “remainder” portion of GMU 9C. The available data does not support the elimination of this fall hunting season.

**Proposal #49: Oppose (Affects: LACL<sup>2</sup>) (GMU 17B)**

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<sup>2</sup> LACL refers to Lake Clark National Preserve

The author proposes a predation control plan for brown bears be implemented in GMU 17B. The NPS requests, consistent with past Board actions pursuant to 5 AAC 92.115 (h), that NPS lands are excluded.

**Proposal #50: Oppose (Affects: LACL) (GMU 17B)**

The author proposes a predation control plan for brown bears be implemented in GMU 17B. The NPS requests, consistent with past Board actions pursuant to 5 AAC 92.115 (h), that NPS lands are excluded.

**Proposal #51: Support (Affects: LACL) (GMU 17B)**

This proposal would change the brown bear hunting season and bag limit for the part of Lake Clark National Preserve in GMU 17B from one brown bear every regulatory year, September 10 to May 25, to alternating spring and fall hunts with one bear every four regulatory years. In 2004 and again in 2006, NPS opposed proposals to liberalize brown bear hunting seasons and bag limits in 17B for the purposes of increasing moose and caribou populations.

The NPS supports returning national preserves to a management strategy independent of intensive management.

**Proposal #52: Oppose (Affects: LACL) (GMU 17B)**

The author proposes to extend the brown bear hunting season for residents and nonresidents in GMU 17 from September 10 to May 25, to September 1 to May 25. The rationale for this proposal is to reduce predation on moose by large adult brown bears. Should the Board support this proposal, we request that NPS lands be specifically excluded.

**Proposal #58: Support (Affects: ALAG<sup>3</sup>, ANIA<sup>4</sup>, LACL & KATM) (GMU 9)**

The NPS supports ADF&G's proposal to change the resident bag limit for winter moose seasons from one bull to one antlered bull. Moose populations on the Alaska Peninsula are considered low density and stable, and limiting the winter hunt to antlered bulls will reduce the potential for accidental harvest of cows and thus contribute to the management of a sustainable winter moose harvest.

**Proposal #59: No Position (Affects: LACL) (GMU 9B)**

The proponent's intent in regard to season changes is not completely clear to the NPS. The issue of antler destruction as a method to decrease competition from non-local hunters could be taken up by the existing joint state/federal working group on 9B moose.

**Proposal #64: Support (Affects: ANIA, LACL & KATM) (GMU 9)**

This proposal would change the wolf hunting season and bag limit for those portions of GMU 9 that include the Aniakchak, Lake Clark, and Katmai National Preserves from 10 wolves per day, August 10–May 25, to 5 wolves per year, August 10–April 30.

The NPS supports returning national preserves to a management strategy independent of intensive management.

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<sup>3</sup> ALAG refers to Alagnak Wild River

<sup>4</sup> ANIA refers to the Aniakchak National Preserve

**Proposal #65: Oppose (Affects: ALAG, ANIA, & KATM) (GMU 9D&E or 9C)**

The author seeks to establish a new predator control area in GMUs 9D and 9E to reduce bear and wolf predation on moose and caribou calves. However, it was suggested to the NPS that the area proposed is more accurately Unit 9C, an area that contains three NPS areas. The NPS requests, consistent with past Board actions pursuant to 5 AAC 92.115 (h) and 5 AAC 92.110 (j), that NPS lands are excluded.

**Proposal #67: Support (Affects: LACL) (GMU 17B)**

This proposal would change the wolf bag limit for the portion of GMU 17B that includes the Lake Clark National Preserve from 10 wolves per day, to 5 wolves per year.

The NPS supports returning the national preserve to a management strategy independent of intensive management.

**Proposal #68: Oppose (Affects: LACL) (GMUs 17 B&C)**

The author proposes to adopt and implement a predator management plan for wolves in GMUs 17B and 17C to reduce predation on moose and caribou calves. The NPS requests, consistent with past Board actions pursuant to 5 AAC 92.110 (j), that NPS lands are excluded.

**Proposal #69: Oppose (Affects: ALAG, ANIA, LACL & KATM)**

The author seeks to adopt and implement a predator control area plan for GMUs 9 and 17 to reduce predation on moose and caribou. This proposed regulation includes portions of a number of NPS national preserves. The NPS requests, consistent with past Board actions pursuant to 5 AAC 92.110 (j), that NPS lands are excluded.

In addition, the NPS is concerned that these park units would be somewhat encircled by predator control areas, increasing the likelihood that predator control measures outside park lands could adversely affect bear and wolf populations inside NPS units.

**Proposal # 71: Support (Affects WRST<sup>5</sup>) (GMU 13)**

This proposal would shorten the trapping season for coyote. The local Advisory Committee submitted this proposal with the goal of stopping incidental catch of fox and lynx while having the season open when fur quality is highest. We support these resource management objectives.

**Proposal #74: Oppose (Affects WRST) (GMUs 11 & 13)**

The author would extend the black bear baiting season in GMUs 11 and 13 from April 15 to June 30 in part to reduce bear predation on moose. Should the Board support this proposal, we request that NPS lands be specifically excluded.

**Proposal #75: Oppose (Affects WRST) (GMU 13C)**

This proposal would allow permits to be issued, within the predator control area of GMU 13, to take grizzly/brown bear for the purposes of predator control, including the use of bait. It is not completely clear whether this proposal would apply to that portion of Unit 13C that falls within Wrangell-St. Elias National Preserve. NPS opposes implementation of this proposal on NPS

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<sup>5</sup> WRST refers to Wrangell-St. Elias National Preserve

lands and requests that, consistent with 5 AAC92.115 (h), this proposal not be authorized on NPS lands.

**Proposal #77: Support (Affects WRST) (GMU 13C)**

This proposal would return the brown bear harvest limit in that portion of Unit 13C that falls within Wrangell-St. Elias National Preserve to pre-intensive management levels. The current ADF&G management strategy for Unit 13, as reflected in current seasons and harvest limits, focuses on the production of moose and caribou in part by reducing predator numbers. For example, the 2003 proposal that led to the current year-round season for brown bear in much of the unit was submitted with the goal of reducing predation on moose, caribou and sheep.

The NPS supports returning national preserves to a management strategy independent of intensive management.

**Proposal #78: Support (Affects WRST) (GMU 11)**

This proposal would ensure that the brown bear harvest does not exceed the average annual harvest of 16 brown bears that existed prior to the establishment of the park and preserve (1961-1978) by instituting a harvest quota and registration permit requirement. The NPS is concerned that recent changes to extend the brown bear hunting season and increase the bag limit for the purpose of reducing bear predation on moose, caribou, and sheep populations constitute intensive management. The NPS supports the intent of this proposal to more carefully manage the harvest of brown bear in the Preserve. Instituting a registration permit requirement is a useful step in that direction and we support it. At this time NPS has insufficient information to determine whether 16 bears is the correct number for a quota.

The NPS supports returning the national preserve to a management strategy independent of intensive management.

**Proposal #79: Oppose (Affects WRST) (GMU 13).**

The author would increase the brown/grizzly bear harvest limit from one bear per regulatory year to two bears per year in order to reduce grizzly bear predation on moose calves. Should the Board support this proposal, we request that NPS lands be specifically excluded.

**Proposal #100: Oppose (Affects: WRST) (GMU13)**

This proposal would establish an archery only season for residents and nonresidents between November 1 and 10. The current seasons offer ample opportunity to harvest moose by bow and arrow. Bulls begin dropping antlers in early November which could affect accurate sex identification by hunters. A November season may also give archery hunters an advantage by using snow machines to locate moose. Establishment of a nonresident archery season would bring pressure to open the earlier seasons to nonresident hunters.

**Proposal #104: Oppose (Affects WRST) GMU 11**

This proposal would change the Dall sheep bag limit in GMU 11 from 1 ram with  $\frac{3}{4}$  curl or larger to 1 ram with full curl horn or larger. The bases for this proposal are the assumptions that: the current  $\frac{3}{4}$  curl horn restriction will encourage hunters to take sub-legal rams in other GMUs and claim they were taken in GMU 11; and that more hunters will be attracted to the

GMU for an easier hunt. There is no available data or information to support either assumption. Currently, Dall sheep survey data indicates that the current harvest strategy is appropriate.

**Proposal #105: Oppose (Affects WRST) (GMU 11)**

This proposal would change the Dall sheep bag limit in GMU 11 from 1 ram with  $\frac{3}{4}$  curl or larger to 1 ram with full curl horn or larger. The basis for this proposal is an assumption that the current  $\frac{3}{4}$  curl horn restriction in GMU 11 will encourage hunters to take sub-legal rams in other GMUs and claim they were taken in GMU 11. There is no available data or information to support this assumption. Currently, Dall sheep survey data indicates that the current harvest strategy is appropriate.

**Proposal #112: Support (Affects WRST) (GMU 13C)**

This proposal would return the wolf harvest regulations in the portion of Unit 13C that falls within Wrangell-St. Elias National Preserve to pre-intensive management levels. ADF&G's management strategy for GMU 13, as reflected in current seasons and harvest limits for wolves, focuses on the production of moose and caribou in part by reducing predator numbers. For example, the 1999 proposal resulting in the increase in the harvest limit to 10 wolves per day was done specifically to reduce wolf predation on moose and caribou.

The NPS supports returning the national preserve to a management strategy independent of intensive management.

**Proposal #166: Oppose (Affects: DENA<sup>6</sup>) (GMU 16)**

This proposal would extend bear baiting seasons and locations, allow the use of snares to take black bears, and allow the taking of brown bears over bait in the GMU 16 predator control area. NPS opposes implementation of this proposal on NPS lands and requests that consistent with 5 AAC92.115 (h) this proposal not be authorized on NPS lands.

**Proposal #168: Oppose (Affects: DENA) (GMU 16)**

This proposal would remove the bag limit on black bears, allow the taking of cubs, allow same-day airborne hunting and the use of helicopters, allow the sale of bear hides, and provide liberalized bear baiting regulations in GMU 16. These changes are inconsistent with NPS management regulations and policies. Should the Board approve the measure, we ask that NPS lands be specifically excluded.

**Proposal #170: Oppose (Affects: DENA) (GMU 16)**

This proposal would allow the use of traps and snares to take brown bears in GMU 16 if authorized by a predator control permit. NPS opposes implementation of this proposal on NPS lands and requests that consistent with 5 AAC92.115 (h) this proposal not be authorized on NPS lands. Additionally, NPS is concerned about the human safety issues involved with the use of traps to take bears.

**Proposal #171: Oppose (Affects: DENA) (GMU 16)**

This proposal would allow the use of traps to take black bears in GMU 16. This activity is inconsistent with NPS management regulations and policies. NPS is also concerned about the

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<sup>6</sup> DENA refers to Denali National Preserve

human safety issues involved with the use of traps to take bears. Should the Board approve the measure, we ask that NPS lands be specifically excluded.

**Proposal #174: Support (Affects: DENA) (GMU 16)**

This proposal would return to pre-Intensive Management hunting regulations for brown bears in NPS-managed areas of GMU 16B. In our February 2005 comments to the Board, NPS opposed the liberalization of brown bear seasons and bag limits for the purpose of reducing bear populations in GMU 16B.

The NPS supports returning national preserves to a management strategy independent of intensive management.

**Proposal #186: Support (Affects: DENA) (GMU 16 B)**

This proposal would return to pre-Intensive Management hunting regulations for wolves in NPS-managed areas of GMU 16B. NPS has opposed modifying wolf seasons and bag limits for the expressed purpose of reducing wolf populations in GMU 16B.

The NPS supports returning national preserves to a management strategy independent of intensive management.

**Proposal #187: Oppose (Affects: DENA) (GMU 16)**

This proposal would extend the GMU 16 Predator Control Area so that it abuts significantly more of the boundary of Denali National Park, and to include areas along the George Parks Highway and Petersville Road. NPS believes that this proposal has the potential to negatively affect the natural and healthy character of wildlife populations in Denali National Park.

**Proposal #189: Oppose (Affects: DENA) (GMU 16)**

This proposal would allow same-day airborne hunting of black bears, allow the use of helicopters to hunt black bears, allow the sale of black bear hides, and liberalize bear baiting regulations. These changes are inconsistent with NPS management regulations and policies. Should the Board approve the measure, we ask that NPS lands be specifically excluded.

**Proposal #192: Oppose (Affects: DENA) (GMU 16)**

The author proposes a number of changes including the use of aircraft to take bears in predator control areas, the use of helicopters by permittees to take wolves and bears in predator control areas, the taking of black bear cubs, removing the bag limit on black bears in GMU 16, and allowing the use of helicopters for hunting access. These activities are inconsistent with various NPS regulations and policies. Should the Board approve the measure, we ask that NPS lands be specifically excluded.

**Proposal #194: Oppose (Affects: ALAG, ANIA, DENA, LACL, KATM & WRST) (GMUs 6-11, 13-17)**

This proposal would establish a year-round coyote hunting season and increase the harvest limit to 10 coyotes per day. The author's justification is for predator control to increase populations of Dall sheep. Should the Board support this proposal, we request that NPS lands be specifically excluded.

**Proposal #195: Oppose (Affects: ALAG, ANIA, DENA, LACL, KATM & WRST) (GMUs 6-11, 13-17)**

This proposal would establish a year-round coyote hunting season with no limit on the number of animals that may be taken. We oppose extending the hunting season into months in which whelping occurs and when pelts are generally in less than prime condition. Should the Board support this proposal, we request that NPS lands be specifically excluded.

**Proposal #197: Oppose (Affects: ALAG, ANIA, DENA, LACL, KATM & WRST) (GMUs 6-11, 13-17)**

This proposal would remove the requirement to seal black bear hides for individuals living off the road system. NPS feels that in order to maintain meaningful harvest data, it is necessary that reporting requirements be consistent between individuals and areas.

**Proposal #198: Oppose (Affects: ALAG, ANIA, DENA, LACL, KATM & WRST)**

This proposal would delegate responsibility of bait station registration and maintenance from hunters to guides contracting these hunts over bait. Bait stations could proliferate without restrictions on client numbers and hunters would be left alone for periods of the hunt. This could complicate enforcement of big game guide regulations pertaining to field participation and communications. NPS opposes implementation of this proposal on NPS lands.

**Proposal #200: Oppose (Affects: DENA, LACL & WRST) (GMU 13 & 16)**

The author proposes to amend the bag limit for brown and black bears taken in intensive management/predator control areas to allow hunters to combine bag limits for bears taken from different game units. This change could increase harvests and result in misreporting of harvests from non-intensive management regions, complicating law enforcement efforts.

**Proposal #201: Support (Affects: ALAG, ANIA, LACL & KATM) (GMUs 6, 7, 9, 10, 15 & 17)**

This proposal would count a wounded brown bear against a hunter's bag limit. The NPS supports the author's intent and conservation ethic.

**Proposal #202: Oppose (Affects: ANIA, DENA, LACL & WRST) (GMUs 9B, 9D, 9E, 11, 13, 16 & 17)**

The intent of this proposal is to continue the brown bear tag fee exemption and thereby increase the harvest of brown bears in order to decrease predation on moose calves. This proposal extends the state's intensive management control objectives and NPS opposes the extension of such measures on NPS lands.

**Proposal #206: Oppose (Affects: ALAG, ANIA, DENA, LACL, KATM & WRST)**

This proposal would establish two archery-only seasons in GMUs 7, 9, 11 and 13-16 between September 20 and 30 and November 1 and 10. The end of September and early November are characterized by a high level of rut activity, which increases the vulnerability of bulls to being taken by hunters and makes the meat less desirable for some people for human consumption. This proposal also assumes that moose populations in the GMUs listed can accommodate additional hunting activity outside the current hunting seasons. An alternative approach might be

to consider implementing archery-only hunts on a unit-by-unit basis to address GMU-specific management concerns.

**Proposal 207: Oppose (Affects: ALAG, ANIA, DENA, KATM, LACL & WRST) (GMUs 9, 11, 13, 14, 15 and 16)**

This proposal would create a drawing hunt for moose, allowing youth to harvest any moose during a ten-day period starting the first day after Christmas break. While the NPS supports efforts that encourage youth to enjoy the outdoors, this proposal is too broad in its approach and assumes that the moose populations in all the GMUs can accommodate an “any moose” hunt. Presumably this proposal includes the harvest of cows and calves. It would be more appropriate to consider implementing a youth hunt on a unit-by-unit basis and with harvest limits consistent with the general hunt in each GMU. A defined season (by date) would improve the proposal and add clarity for hunters. As the Board knows, there is variation between school districts schedules in the State.

**Proposal #215: Support (Affects: ALAG, ANIA, DENA, KATM, LACL & WRST) (GMUs 6-11, 13-17)**

This proposal would establish the requirement to seal Dall sheep horns in all GMUs in Region II. Sealing provides wildlife managers with a method to measure and record biological data on specific species and populations and to track the age and condition of harvested animals. Furthermore, the sealing of Dall sheep horns assists wildlife managers and law enforcement in ensuring that horn size regulations are followed.

**Proposal #216: Oppose (Affects: WRST) (GMU 11)**

This proposal would change the horn restrictions on Dall sheep in Region II to full curl only. Harvest management strategies should reflect the status of individual sheep populations and local harvest pressure. At this time we do not have sufficient data to support a change for this GMU.

**Proposal #217: Oppose (Affects: DENA, LACL & WRST) (GMUs 6-11, 13-17)**

This proposal would eliminate the requirement to seal Dall sheep horns in all GMUs in Region II. Sealing provides wildlife managers with a method to measure and record biological data on specific species and populations and to track the age and condition of harvested animals. Furthermore, the sealing of Dall sheep horns assists wildlife managers and law enforcement in ensuring that horn size regulations are followed.

**Proposals # 219: Support (Affects: DENA, LACL & WRST) (GMUs 6-11, 13-17)**

This proposal would require that all rams harvested in the Southcentral region be sealed within 30 days of harvest. Sealing provides wildlife managers with a method to measure and record biological data on specific species and populations and to track the age and condition of harvested animals. Furthermore, the sealing of Dall sheep horns assists wildlife managers and law enforcement in ensuring that horn size regulations are followed.

**Proposal #246: Support (Affects: ALAG, DENA, KATM, LACL, WRST & YUCH<sup>7</sup>) (GMU 1-7, 11-17, 20)**

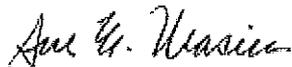
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<sup>7</sup> YUCH refers to Yukon-Charley Rivers National Preserve

The NPS supports the intent of this proposal to require black bear harvest tickets in any unit where black bear sealing is required. Sealing provides critical information about the animals harvested in a particular hunt, but very little about the hunters themselves. Requiring harvest tickets in addition to sealing will provide wildlife managers with additional information regarding hunter effort and hunting patterns to support management decisions and strategies.

Again, I appreciate the opportunity to provide you with comments from the National Park Service. Should you have any questions please contact Sandy Rabinowitch by telephone at 907.644.3596

Sincerely,



Sue E. Masica  
Regional Director

cc:

Denby Lloyd, Commissioner, ADF&G  
Doug Larsen, Director, Wildlife Conservation, ADF&G  
Ron McCoy, Acting Special Assistant to the Secretary for Alaska  
Greg Dudgeon, Superintendent, Yukon-Charley Rivers NPRES/Gates of the Arctic NP&P  
Joel Hard, Superintendent, Lake Clark NP&P  
Meg Jensen, Superintendent, Wrangell-St. Elias NP&P  
Ralph Moore, Superintendent, Katmai NP&P  
Paul Anderson, Superintendent, Denali NP&P  
Deborah Cooper, Associate Regional Director, NPS Alaska Region  
Dave Mills, Subsistence Team Leader, NPS Alaska Region  
Sandy Rabinowitch, Subsistence Manager, NPS Alaska Region  
Chris Pergiel, Chief Law Enforcement Officer, NPS Alaska Region



Michael Felber • 670 Adelma Beach Rd. • Port Townsend, WA 98368

Feb. 12, 2009

**B.O.G. comments**  
**Support proposals 42, 43, 44, 45.**

Dear Alaska Board of Game Members,

I urge you to support proposals 42, 43, 44, and 45, and please do not allow brown bear hunting in areas close to Katmai Natl. Park. The Alaska Board of Game is mandated to manage wildlife for all users, including bear viewers. The potential for dangerous confrontations between hunters firing rifles and bear viewers or photographers now exists.

The bears in this area have become tolerant of people, because they are viewed by hundreds of visitors every year. They have lost their fear of hunters, and are unlikely to flee when hunted. They would become easy targets. Many hunters don't want to see these areas opened to hunting because of their interest in fair chase ethics.

Bear viewing in McNeil River and in Katmai Park would be adversely affected because the bears would learn to avoid the visitors. Bear viewing is a part of Alaska's tourism industry and contributes millions of dollars to the states economy. While this is the best area in Alaska to view brown bears, there are many opportunities to hunt bears elsewhere.

I am a published natural science illustrator, and I have been going to Katmai Natl. Park every year for the last 5 years to view photograph and draw brown bears. I am currently working on a painting of a mature male brown bear, from one of my photographs taken in Katmai Natl. Park. I already have a publisher that will be selling prints of this bear painting in Alaska and the lower 48 states and in Canada and Europe. This is another way that bear viewing brings money into Alaska. If the bear viewing opportunities that were available to me in Katmai didn't exist, I would have been unable to make this bear painting. The print will also help to promote bear viewing to other people, bringing more visitors and money to Alaska.

Bear viewing could continue to bring visitors and money into Alaska indefinitely, but hunting in these areas may end the bear viewing opportunities. Bears are being over-hunted just over the boundary in Katmai National Preserve. The number of bears at McNeil River has declined significantly over the past 6 years. Hunting them in peripheral areas would worsen the decline.

Thank you for your consideration.

Sincerely,



Michael J. Felber

Public Comment # 126

RECEIVED TIME FEB. 12. 11:50AM



TO THE FISH AND GAME BOARD

PROPOSAL 20-5 AAAC 92.550 AREAS CLOSED TO TRAPPING. I STRONGLY AGREE WITH THIS PROPOSAL. IT IS UNFAIR THAT THERE ARE ~~OUR~~ TRAPS NEAR TRAILS IN CHUGACH STATE PARK. BECAUSE OF THIS THE REST OF THE SKIERS, HIKERS CANNOT SAFELY USE THE PARKS TRAILS WITH OUR DOGS!! WITH OUT FEAR OF HAVING OUR DOGS KILLED IN A TRAP. THERE ARE TOO MANY PEOPLE THAT DON'T SKI BECAUSE OF A FEW TRAPPERS. VERY UNFAIR!!

KATHY FEATHERGILL CALVIN

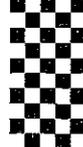
PROPOSAL 21-5AAAC 92.550 AREAS CLOSED TO TRAPPING TOO MANY DOGS HAVE <sup>DIED</sup> IN BIRD CREEK AND INDIAN BECAUSE OF TRAPPING. WE NEED TO GET TRAPS AWAY FROM OUR COMMUNITY.

KATHY FEATHERGILL CALVIN

PROPOSAL 22-5AAC 84.270 FUR BEARER TRAPPING AND 92.550 AREAS CLOSED TO TRAPPING.

I STRONGLY AGREE THAT LYNX SHOULD NOT BE TRAPPED IN CHUGACH STATE PARK. LEAVE THE LYNX ALONE IN OUR STATE PARK. SO PEOPLE CAN ENJOY

KATHY FEATHERGILL CALVIN  
HC 52 Box 8873  
Indian, AK 99540  
(907) 653-7673



23495

Line 1AHTNA GLENNAL

11:11:19 a.m.

02-12-2009

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RECEIVED

FEB 12 2009

BOARDS  
ANCHORAGE

February 12, 2009

Alaska Dept. of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

*Ahtna: Scott  
Public Comments  
BOG*

To the Alaska Board of Game Directors:

Enclosed is the Ahtna Tene Nene' Customary & Traditional Use Committee's comments on the 2009 Spring Alaska Board of Game Wildlife Proposals.

Please read our comments on the wildlife proposals and take them in considerations during deliberations.

If you any questions, please call Ms. Stickwan at (907) 822-3476, ext. 237.

Sincerely,  
*Stiona Stickwan  
for  
Linda Tyone*

Linda Tyone, Chair  
Ahtna Tene Nene' Customary &  
Traditional Use Committee

Enc. 1

P.O. Box 649 - Glennallen, Alaska 99588  
Phone: (907) 822-3476 - Fax: (907) 822-3495

RECEIVED TIME FEB. 12. 1:13PM

Public Comment # 128



**Alaska Board of Game Meeting - Wildlife Proposals  
Dena'ina Civic & Convention Center  
8:30 a.m - 5:00 p.m.  
2-27/3-9-09**

**Proposal 70: Hunting seasons and bag limits for small game. By ADF&G.**

**Comment:**

We support Proposal 70 to shorten the Ptarmigan season in Unit 13B to end on November 30<sup>th</sup>, but not increase the winter season for Units 13A, B, and E to 10 per day.

**Proposal 71: Furbearer trapping. By Copper Basin Fish and Game Advisory Committee.**

**Comment:**

We support Proposal 71 to shorten the coyote trapping season to November 10-March 31, no bag limit, because there is incidental harvest of lynx and fox while trapping for coyote.

**Proposal 72: Hunting seasons and bag limits for bison. By Copper Basin Fish and Game Advisory Committee.**

**Comment:**

We support Proposal 72 to extend bison boundaries in Unit 11 as stated in the proposal, since Ahtna, Inc. already allows a bison hunt within the area. We encourage ADF&G to continue to work with the public to get a permit from Ahtna, Inc. to hunt on Ahtna Regional Lands.

**Proposal 73: Hunting seasons and bag limits for black bear. By Denali Advisory Committee.**

**Comment:**

We support Proposal 73 to lengthen the black bear season in Unit 13E for residents and Nonresidents from April 15 to June 30, so that more Black Bear will be shot and population decreased in this area.

P.O. Box 649 - Glennallen, Alaska 99588  
Phone: (907) 822-3476 - Fax: (907) 822-3495

**Proposal 74: Hunting seasons and bag limits for black bear; and 92.044. Permit for hunting black bear with the use of bait or scent lures. By Anchorage Advisory Committee.**

**Comment:**

We support Proposal 74 to lengthen the black bear season in Unit 11 and 13 for residents and Nonresidents to April 15 to June 30, so that more Black Bear will be shot and population decreased in this area.

**Proposal 75: Unlawful methods of taking big game; exceptions; 92.115. Control of predation by bears; and 92.125(c). Predation Control Areas Implementation Plans. By Shawn Conway.**

**Comment:**

We oppose Proposal 75 to change the brown bear regulations for 13C back to pre-Intensive Management rule. Brown bear behavior is greatly different than the black bear and more dangerous and unpredictable. Once they get used to being fed they will start coming into residential areas.

**Proposal 76: Hunting seasons and bag limits for brown bear; and 92,132. Bag limit for brown bears. Increase bag limit in Unit 13 E.**

**Comment:**

We support proposal 76 increasing bag limit in Unit 13 E.

**Proposal 77: Hunting seasons for bag limits for brown bear in Unit 13 C.**

**Comment:**

We oppose proposal 77; there is no biological concern warranting the change to the current regulations. We have seen an increase in bear activity in that area.

**Proposal 78: Hunting seasons and bag limits for brown bear. By Jim Stratton, National Parks Conservation Association.**

**Comment:**

See comment under Proposal 77. The caribou population has dramatically decreased from 3500 to 350; the caribou season has been closed since 1993.

**Proposal 79: Hunting seasons and bag limits for brown bear, and 92.132. Bag limit for brown bears. By Copper Basin Fish and Game Advisory Committee.**

**Comment:**

We support Proposal 79 to increase Unit 13 brown bear take to 2 bag limit per year. Unit 13 moose/caribou calves are being killed by wolves, brown/black bears, and any viable solution will help with the problem.

**Proposal 80: Hunting seasons and bag limits for goat. By Anchorage Advisory Committee.**

**Comment:**

We oppose Proposal 80 to extending Unit 13D goat hunting area. The population of goats in this area doesn't warrant an increase in those allowed to hunt. May increase trespass on private property.

**Proposal 81: Unlawful methods of taking big game; exceptions. By the Copper Basin Fish and Game Committee.**

**Comment:**

We support Proposal 81 restricting clip size to reduce wounding loss of caribou.

**Proposal 83: Salvage of game meat, furs and hides. By Copper Basin Fish and Game Advisory Committee**

**Comment:**

See comments in Proposal 82.

**Proposal 84: Community harvest hunt area and permit conditions; and 92.074. Community subsistence harvest hunt areas. By Ahtna Tene Nene' Customary & Traditional Use Committee.**

**Comment:**

We the Ahtna People submitted this proposal as an attempt to work with the Board of Game to find a viable solution to the Tier II Subsistence Permit inadequacies, and we hope that the Board and other hunters and group will work with us too. We believe this community harvest proposal has the potential to address many of the issues and concerns expressed by subsistence users, ADF&G, the BOG and other users throughout the years of controversy over Tier II and other moose and caribou hunts in Unit 13.

**Proposal 85: Destruction of trophy value of game required in specific areas. By the Ahtna Tene Nene' Customary & Traditional Use Committee.**

**Comment:**

We support Proposal 85 to repeal the requirement to destroy Unit 13 caribou/moose antlers. It is an unnecessary burden upon the subsistence users, and it makes criminals out of law abiding citizens.

It is another regulation that law enforcement has to enforce. Enforcement in Unit 13 is difficult right now as it is.

It makes it difficult for subsistence users to cut or destroy caribou/moose antlers, while in the field after harvesting a caribou or moose.

Traditionally, we took the whole caribou and moose antlers, home to use for tools. This regulation is not our customary and traditional ways of handling and caring for moose and caribou.

**Proposal 86: Priority for subsistence hunting; Tier II permits. By the Ahtna Tene Nene' Customary and Traditional Use Committee.**

**Comment:**

We support Proposal 86 to "repeal 5 AAC 92.0062(c) an individual holding a Unit 13 Tier II Permit for moose or caribou is prohibited from hunting that species anywhere else in the state during that regulatory year".

Subsistence Hunters in Unit 13 are not allowed to hunt in nearby units, such as Unit 11, 20A, or Unit 12; which are traditional territorial Ahtna hunting areas.

We, in Unit 13, have restrictions placed upon us that are not being imposed upon other hunters in the State of Alaska. We view that as being discriminatory to people who are required to hunt only in Unit 13.

For example, the people who live in Chistochina customarily and traditionally hunt in Unit 12 as well as in Unit 13, and people in Chitina traditionally hunt in Unit 11 as well as in Unit 13. This regulation creates a hardship for these communities.

We have to choose whether we want to participate in Tier II permit hunt or hunt elsewhere. We as subsistence users who are among the most eligible to

receive Tier II permits should be able to hunt within our traditional and historical areas.

This regulation is a hardship. Ahtna subsistence users are not able to meet subsistence needs under this regulation and others governing subsistence hunts in GMU 13. It makes criminals out of good, decent people.

**Proposal 87: 92.070(a) and (b). Tier II subsistence hunting permit point system. By the Ahtna Tene Nene' Customary & Traditional Use Committee.**

**Comment:**

All regulations related to "zeroing out", and all questions on income must be deleted from the Tier II subsistence hunting permit point system in order to protect the subsistence way of life consistent with the intent of the subsistence law. Subsistence is not a welfare system and it was a terrible mistake for the Board of Game to make it such. Alaska Native people throughout the State view this regulation as a hostile and unnecessary attack on their way of life. Native children should not have to believe that they must choose to be poor in order to continue to live and hunt in the traditional way.

We would like to see the score changed on the question about the applicant's hunting on or eating from the game population so that more applicants will get more points for this question. Changing the years of age to 30 would give more equitable points to all the applicants.

Changing Tier II subsistence hunting permit point system as proposed will give subsistence users most dependent on the resource for customary and direct dependence and for food additional points, and increase their chance of receiving a Tier II moose/caribou permit.

**Proposal 88: Tier II subsistence hunting permit point system. By Jerry Hepler and Anchorage Fish and Game Advisory Committee.**

**Comment:**

See comments for Proposal 87.

**Proposal 89: Priority for subsistence hunting; Tier II permits. By Bill and Judy Dyroff.**

**Comment:**

We oppose Proposal 89.

**Proposal 90: Tier II subsistence hunting permit point system. By Jerry Hepler and Anchorage Fish and Game Advisory Committee.**

**Comment:**

See comments under Proposal 87.

**Proposal 92: Salvage of game meat, furs and hides. By Copper Basin Fish and Game Advisory Committee.**

**Comment:**

We oppose Proposal 92, eliminating "salvage meat on the bone requirements" regulation.

We take all parts of the moose from the field. We would never leave bones in the field. We make soup out of the bones, especially, the front and hind quarters.

It is against our customary and traditional ways to "conduct wanton waste" such as leaving bones of moose and caribou in the field.

**Proposal 94: Hunting seasons and bag limits for moose. By Ahtna Tene Nene' Customary & Traditional Use Committee.**

**Comment:**

We support Proposal 94 to lengthen Unit 13 Tier II Moose season to August 10 to September 20.

The current Unit 13 Tier II moose season has never met needs of subsistence uses. The success rate of Unit 13 moose taken is about 51 of the 150 permit holders.

Only a few hunters take a moose in Unit 13 under the current season of the Tier II permit hunt because the moose are in the higher uplands areas.

Lengthening the moose season to coincide with the Unit 13 Nelchina Caribou season will allow us to hunt for moose and caribou at the same time.

Enforcement issues can be alleviated with a different colored harvest ticket given to Tier II hunters.

**Proposal 95: Hunting seasons and Bag limits for moose. By the Alaska Dept. of Fish and Game.**

**Comment:**

We oppose Proposal 95 to open up a Drawing Permit, while the current situation of subsistence needs are not being met.

A viable solution to the Tier II situation and subsistence uses must be addressed before allowing a Drawing Permit in portions of Unit 13.

These remote, upland moose may travel to lowlands and could be sought after by the Tier II moose hunters, if a longer moose season were allowed in Unit 13.

**Proposal 96: Boards of fisheries and game subsistence procedures: By the Alaska Dept. of Fish and Game.**

**Comment:**

We support Proposal 96 to have the Board of Game determine the Amount Necessary for Subsistence (ANS) for Unit 13 Moose. Our subsistence needs are currently unmet under the current regulatory regime for subsistence moose hunting in Unit 13. The regulatory regime, including the ANS should be revised to fully provide for subsistence uses and needs and to comply with the state subsistence law. Revision of the ANS is a necessary component of comprehensively addressing Unit 13 subsistence regulations. The Community Harvest Permit Proposal – number 84 – should be adopted prior to consideration of the ANS as it may help define subsistence uses and needs for the Unit 13 moose populations.

**Proposal 97: Hunting seasons and bag limits for moose. By Tok Cut-off Nabesna Road Advisory Committee.**

**Comment:**

We oppose Proposal 97 to allow a Nonresident Unit 13 Moose hunt, until such time as the Board has adopted regulations that fully provide for subsistence needs, uses and opportunity.

**Proposal 98: Hunting seasons and bag limits for moose. By Randall L. Kuehler.**

**Comment:**

We support more hunting opportunity for subsistence uses of moose in Unit 13, and therefore support the more liberal hunt contained in this proposal, but only for subsistence hunts and only to the extent that an "any bull" or a more liberal hunt cannot be authorized for subsistence hunting. Proposals for more liberal general or non-residents hunts should only be authorized after subsistence uses and opportunity is fully satisfied.

**Proposal 99: Hunting seasons and bag limits for moose. By Thumper Williamson, Terry Spracklen, and Dave Stevenson.**

**Comment:**

We oppose Proposal 99 to allow non residents and to extend the season.

**Proposal 100: Hunting seasons and bag limits for moose. By Anchorage Advisory Committee.**

**Comment:**

Until such time as the Board has adopted regulations that fully provide for subsistence needs, uses and opportunity, we oppose Proposal 100 to establish an archery season in Unit 13 moose: one bull with spike fork antlers or 50-inch antlers with 4 or more brow tines on at least one side, by bow and arrow only with a season date of November 1 - November 10 for Residents and November 1- November 10 for Nonresidents.

**Proposal 101: Hunting seasons and bag limits for moose. By The Alaska Professional Hunters Association.**

**Comment:**

Until such time as the Board has adopted regulations that fully provide for subsistence needs, uses and opportunity, we oppose Proposal 101 to allow a Nonresident Unit 13 Moose hunt.

**Proposal 102: Hunting seasons and bag limits for moose. By Otto Kuhn.**

**Comment:**

Until such time as the Board has adopted regulations that fully provide for subsistence needs, uses and opportunity, we oppose Proposal 102 to allow a Nonresident Unit 13D Moose hunt.

**Proposal 103: Hunting seasons and bag limits for moose. By Upper Tanana/Fortymile Advisory Committee.**

**Comment:**

Until such time as the Board has adopted regulations that fully provide for subsistence needs, uses and opportunity, we oppose Proposal 103 to allow a Nonresident Unit 13 Moose hunt.

**Proposal 104: Hunting seasons and bag limits for Dall sheep. By Anchorage Advisory Committee.****Comment:**

We oppose this as it would eliminate the subsistence preference currently in place which allows  $\frac{3}{4}$  or larger curl.

**Proposal 105: Hunting seasons and bag limits for Dall sheep. By Troy Vincent.****Comment:**

We oppose this as it would eliminate the subsistence preference currently in place which allows  $\frac{3}{4}$  or larger curl.

**Proposal 106: Hunting seasons and bag limits for Dall sheep. By Kyle Wait.****Comment:**

We oppose Proposal 106 to create a bow hunt in Unit 13D and 14A for Dall sheep.

The probability of wounding and leaving Dall sheep in Unit 13D is a possibility. This is just another special hunt for archers and is unnecessary.

**Proposal 107: Hunting seasons and bag limits for Dall sheep. By Matanuska Valley Fish and Game Advisory Committee.****Comment:**

We oppose Proposal 107 to create a bow hunt in Unit 13D for Dall sheep.

The probability of wounding and leaving Dall sheep in Unit 13D is a possibility. This is just another special hunt for archers and is unnecessary.

**Proposal 108: Hunting seasons and bag limits for Dall sheep. By Troy Vincent.**

**Comment:**

No Comment.

**Proposal 109: Hunting seasons and bag limits for Dall sheep. By Matanuska Valley Fish and Game Advisory Committee.**

**Comment:**

No Comment.

**Proposal 110: Unlawful methods of taking big game; exceptions. By Troy Vincent.**

**Comment:**

We oppose Proposal 110.

**Proposal 111: Required permit hunt conditions and procedures. By Daniel G. Montgomery.**

**Comment:**

We are neutral on Proposal 111 to require nonresident hunters to have a guide/client agreement to ensure a hunt in Unit 13D.

**Proposal 112: Hunting seasons and bag limits for wolf. By Jim Stratton, National Parks Conservation Association.**

**Comment:**

We oppose Proposal 112 to set Unit 13C wolf harvest back to pre-Intensive Management harvest of five per season.

**Proposal 113: Predation Control Areas Implementation Plans. By Alaska Wildlife Alliance.**

**Comment:**

We oppose Proposal 113 to amend the Predator Control Implementation Plan for Unit 13. Wolves and bears are preying upon caribou and moose calves.

**Proposal 114: Predation control areas implementation plans. By Greg Pepperd.**

**Comment:**

We support Proposal 114 to allow the boundary of the predator control program to be moved to below the Gold Creek bridge on the Susitna River to the mouth of the Talkeetna River to the west bank of the Susitna River.

**Proposal 115: Required permit hunt conditions and procedures. By Tok Cutoff-Nabesna Road Advisory Committee.**

**Comment:**

We support Proposal 115 to allow preference points for those not drawn for drawing permit hunts.

**Proposal 116: Unlawful methods of taking big game; exceptions. By Frank Danford.**

**Comment:**

We oppose restricting the use of motorized vehicles weighing less than 1500 pounds in Unit 13 as a whole.

**Proposal 190: Permit for taking wolves using aircraft; Permit for hunting black bear with the use of bait or scent lures; Permit conditions for hunting black bear with dog; Unlawful methods of taking game; exceptions; Unlawful methods of taking big game; exceptions; Intensive management of identified big game prey populations; Identified big game prey populations and objectives; Control of predation by wolves; Control of predation by bears; and Predation Control Areas Implementation Plans. By the Alaska Dept. of Fish and Game.**

**Comment:**

We support Proposal 190 to use the various methods stated in the proposal for additional predator management options by the department.

**Proposal 194: Hunting seasons and bag limits for fur animals. By Alaska Chapter FNA/Wild Sheep Foundation.**

**Comment:**

See comments under Proposal 195.

**Proposal 195: Hunting seasons and bag limits for fur animals. By Anchorage Advisory Committee.**

**Comment:**

We support Proposal 195 to eliminate seasons and bag limits for coyotes region-wide in Region II Units to protect sheep, lambs and other small game.

**Proposal 196: Hunting seasons and bag limits for bison. By Coby Thomas.**

**Comment:**

We oppose Proposal 196 to have a lifetime permit count against a person, if they harvest a Unit 11 or Unit 13 Bison.

**Proposal 197: Sealing of bear skins and skulls. By Bill and Judy Dyroff.**

**Comment:**

We support Proposal 197 to exempt sealing requirements for black bear harvested in Region II for human consumption by individuals not living on the road system.

**Proposal 198: Permit for hunting black bear with the use of bait or scent; lures. By Anchorage Advisory Committee>**

**Comment:**

We support Proposal 198 to allow less stringent regulations regarding guided black bear baiting requirements.

**Proposal 200: Predation Control Areas Implementation Plans; Hunting seasons and bag limits for black bear; and Hunting seasons and bag limits for brown bear. By Anchorage Advisory Committee.**

**Comment:**

We support Proposal 200 to allow bears taken in one unit not to count against another in an intensive management unit area.

**Proposal 202: Brown bear tag fee exemption. By Alaska Department of Fish and Game.**

**Comment:**

We support Proposal 202 to extend brown bear tag fee exemption for Unit 11 and Unit 13, proponent's list of units as well.

**Proposal 203: Hunting seasons and bag limits for goat. By Coby Thomas.**

**Comment:**

No Comment.

**Proposal 204: Harvest tickets and reports; Hunter education and orientation requirements; and Discretionary permit hunt conditions and procedures. By Troy Vincent.**

**Comment:**

We support Proposal to have a class on mountain goat orientation, and the cost of female goat harvest tag to be \$250, if a person did not take a mountain goat orientation goat course.

**Proposal 205: Permit for Possessing Live Game; Feeding of Game. Wildlife Stocking. By Matanuska Valley Fish and Game Advisory Committee.**

**Comment:**

We oppose Proposal 205 because Wildlife Stocking is not a Board of Game regulation, and Ahtna, Inc. does not have the financial means to care for moose calves. Proposals should not be written on behalf of Native Corporations.

**Proposal 206: Hunting seasons and bag limits for moose. By Matanuska Valley Fish and Game Advisory Committee.**

**Comment:**

Until such time as the Board has adopted regulations that fully provide for subsistence needs, uses and opportunity, we oppose Proposal 206 to allow an archery Moose hunt in Unit 11 and Unit 13 with a separate hunt.

**Proposal 207: Hunting seasons and bag limits for moose. By Troy Vincent.**

**Comment:**

Until such time as the Board has adopted regulations that fully provide for subsistence needs, uses and opportunity, we oppose Proposal 207, which would establish a youth hunt in the month of December, starting the first Sunday after Christmas break.

**Proposal 209: Hunting seasons and bag limits for Dall sheep. By Alaska Chapter Foundation for North American Wild Sheep.**

**Comment:**

We oppose Proposal 209 to return Unit 13D Dall sheep hunt to a harvest ticket, rather than a drawing hunt.

**Proposal 210: Hunting seasons and bag limits for Dall sheep. By John Frost.**

**Comment:**

We oppose Proposal 210 to establish new archery permit hunts in Region II.

**Proposal 211: Hunting seasons and bag limits for Dall sheep. By John Frost.**

**Comment:**

See comments under Proposal 210.

**Proposal 212: Hunting seasons and bag limits for Dall sheep. By Coby Thomas.**

**Comment:**

We support Proposal 212 to limit Nonresidents to a maximum of 10% of the total permits available in units that already have drawing regulations in place.

**Proposal 213: Hunting seasons and bag limits for Dall sheep. By Coby Thomas.**

**Comment:**

We oppose Proposal 213 to turn all units into a drawing permit, but do support limiting nonresidents to a maximum 10 percent of the total permits available.

**Proposal 214: Hunting seasons and bag limits for Dall sheep. By Joel Wagner.**

**Comment:**

See comments on 213.

**Proposal 215: Sealing of Dall sheep horns. By Alaska Chapter FNA/Wild Sheep Foundation.**

**Comment:**

We oppose Proposal 215 to require all rams harvested in Region II be sealed within 30 days of harvest.

**Proposal 216: Hunting seasons and bag limits for Dall sheep. By Alaska Chapter Foundation for North American Wild Sheep.**

**Comment:**

We oppose Proposal 216 to have bag limit for Dall sheep in Region II to be full curl only.

**Proposal 217: Sealing of Dall sheep. By Denali Fish and Game Advisory Committee.**

**Comment:**

We oppose Proposal 217 to repeal Dall sheep sealing requirement in Region II. Biologists need to keep accurate data on Dall sheep population and harvest data, etc.

**Proposal 218: Hunting seasons and bag limits for Dall sheep. By Tom Lamal.**

**Comment:**

We support Proposal 218 to have different hunting dates for Region II Dall sheep for residents and Nonresidents. Fewer conflicts will occur between the two user groups, if hunting dates were separate.

**Proposal 219: Sealing of Dall sheep. By Alaska Dept. of Fish and Game.**

**Comment:**

We support Proposal 219 to have all Region II Dall sheep sealed before possessing, transporting, or exporting it from the State of Alaska. ADF&G needs to keep accurate data on Dall sheep.

**Proposal 220: Unlawful methods of taking big game; exceptions. By Brian Peterson.**

**Comment:**

We support Proposal 220 to make it illegal for client(s) of transporters to harvest any game while being transported. Transporters are providing hunting services without a Guide license and permits.

**Proposal 221: Unlawful methods of taking big game; exceptions. By Troy Vincent.**

**Comment:**

We support Proposal 221 to modify airborne restrictions to dis-allow hunting or helping a person(s) take big game until 24 hours the following the day they have flown.

**Proposal 222: Unlawful methods of taking game; exceptions. By Walter Soroka.**

**Comment:**

We strongly oppose Proposal 222 prohibit shooting in Unit 13 fifty feet from the road. Most of us do not have ATVs to hunt off the road system. This regulation would seriously impact our ability to meet our subsistence needs and would deny us reasonable opportunity for subsistence uses.

**Proposal 223: Required permit hunt conditions and procedures. By Brian Petersen.**

**Comment:**

We support Proposal 223 in Region II; nonresidents must have a completed guide-client agreement in place, before filling out a drawing permit application for sheep, brown/grizzly bear and mountain goat.

**Proposal 234: Hunting seasons and bag limits for moose. By Alaska Dept. of Fish and Game.**

**Comment:**

We oppose Proposal 234 to reauthorize the antlerless moose hunt in Unit 20A as there is a serious trespass issue for private property owners in the southern portion above the Nenana Bridge.

**Proposal 240: Required permit hunt conditions and procedures. By Alaska Board of Game.**

**Comment:**

We support Proposal 240 to increase the number to six for drawing permit hunts that hunters can apply for each year.

**Proposal 241: Required permit hunt conditions and procedures. By Alaska Board of Game.**

**Comment:**

We support Proposal 241 to establish a bonus point system for some drawing hunts as written in the proposal by the Board of Game.

**Proposal 242: Special hunts for disabled veterans. By Bruce D. Frady.**

**Comment:**

No comment.

**Proposal 243: Management Areas. By Alaska Dept. of Fish and Game at the request of Board of Game.**

**Comment:**

No comment.

**Proposal 245: Hunter education and orientation requirements. By Alaska Board of Game.**

**Comment:**

We support Proposal 243 to require archers hunting black bear over bait to take department approved bear baiting course or IBEP certified statewide.

**Proposal 246: Harvest tickets and reports. By Alaska Dept. of Fish and Game.**

**Comment:**

We oppose 246 to require harvest tickets in any unit where black bear sealing is required.

FEB. 12, 2009

ALASKA Dept of FISH + GAME  
ATTN: BOG COMMENTS

LEONARD AND DIANE JEWKES  
1891 BLACKBURN WAY,  
NORTH POLE, ALASKA 99705

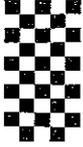
WE SUPPORT PROPOSAL # 218

WE BELIEVE THAT THE QUALITY OF THE  
HUNT FOR RESIDENTS AND NON-RESIDENTS  
WILL BE IMPROVED AND THAT THE CONFLICTS  
BETWEEN HUNTERS WILL BE REDUCED  
IF THIS PROPOSAL IS APPROVED.

Leonard Jewkes  
Diane Jewkes

Public Comment # 129





To: Attn:BOG Comments  
Alaska Dept. of Fish and Game  
Boards Support Section

Page 1

From: Larry Dalrymple  
767 Chena Hills Drive  
Fairbanks, Alaska 99709

Subject: Comments for Spring 2009 BOG Meeting

Proposal #61—Support—Individuals should be able to sign up at any ADF&G office, or electronically.

Proposal #95—Support

Proposal #96—Support

Proposal #110—There is no biological data submitted to support this proposal. Proposer should hunt only CUA's if they want areas with access restrictions. That's what they are for.

Proposal #112—Oppose

Proposal #116—Oppose—No statistics are given.

Proposal #163—Support—Hunters should be able to apply at any F&G office, or via the internet.

Proposal #205—Support, with amendment—should not have to be Natives or Native land. Any organization should be able to apply.

Proposal #215—Support

Proposal #218—Strongly support—This proposal should ultimately be adopted statewide. Many other states already strongly discriminate against non-resident hunters, by limiting the percentage of tags to non-residents, and modifying the non-resident seasons. I don't believe this would impact, or restrict the non-resident participation in Alaska sheep hunts at all. Non-resident hunters/guides will still be able to hunt in two 9 day hunt periods.

Proposal #221—Oppose

Public Comment # 130

Proposal #241—Support, with amendment. I think a preference point system should be implemented for all drawing hunts in Alaska.

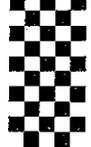
Proposal #243—Support, with amendment—must define “disabled”.

Proposal #244—Oppose—I have been a hunter and reloader for over 50 years. I am certainly sympathetic to the wounding of animals, and attune to the caribou atrocity that occurred in Pt Hope this past fall, but do not think this is the way to go about it. If you really want to have an impact, then do an outright ban on all “black rifles”, or semi-automatic military style weapons for hunting in Alaska.

Dalrymple Page 2

Public Comment # 130

RECEIVED TIME FEB. 12. 10:41AM



Karen Hackenberg • 670 Adelma Beach Rd. • Port Townsend, WA 98368

Feb. 12, 2009

B.O.G. comments  
Support proposals 42, 43, 44, 45.

Dear Alaska Board of Game Members,

I urge you to support proposals 42, 43, 44, and 45, and please do not allow brown bear hunting in areas close to Katmai Natl. Park. The Alaska Board of Game is mandated to manage wildlife for all users, including bear viewers. The potential for dangerous confrontations between hunters firing rifles and bear viewers or photographers now exists.

The bears in this area are tolerant of people. Because they are viewed by hundreds of visitors every year they have lost their fear of hunters. The bears are unlikely to flee when hunted and are easy targets. Many hunters want this area closed to hunting because they believe in the ethics of a fair chase. Bears accustomed to humans do not have a fair chance.

If areas close to Katmai Natl. Park were opened to hunting, bear viewing in McNeil River and in Katmai Park would be adversely affected because the bears would learn to avoid the visitors. Bear viewing is a part of Alaska's tourism industry and contributes millions of dollars to the state's economy. While this is the best area in Alaska to view brown bears, there are many opportunities to hunt bears elsewhere.

Each year for the past 5 years I have traveled to Katmai National Park to view, photograph, and draw the brown bears. I am an artist that draws and paints landscapes and animals. I am currently making paintings of the bears I've seen at Katmai, which I will show and sell in reputable galleries. If the bear viewing opportunities that are available to me in Katmai do not continue to exist, I would have been unable to pursue my work.

The Alaska Board of Game is mandated to manage wildlife for all users including bear viewers. Bear viewing could continue to bring visitors and money into Alaska indefinitely, but hunting in these areas may end the bear viewing opportunities. The bears that live just over the boundary in Katmai National Preserve are being over-hunted. The number of bears at McNeil River has declined significantly over the past 6 years. Hunting them in peripheral areas would worsen the decline.

The potential now exists for dangerous confrontations between hunters firing rifles and bear viewers or photographers.

Thank you for your consideration

Sincerely,



Karen Hackenberg

Public Comment # 131

RECEIVED TIME FEB. 12. 2:28PM

Rick Rogers  
16001 Wind Song Drive  
Anchorage, AK 99516

February 12, 2009

ATTN: BOG COMMENTS  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526

Via fax 90-7-465-6094, Original via US Mail

Alaska Board of Game,

Please consider the following comments in your deliberations regarding game management for unit 14C.

PROPOSAL 1 – 5 AAC 85.020 Hunting seasons and bag limits for brown bear.

Support

The Brown bear population in Anchorage is creating undue risk within our community. It is only a matter of time before we have a fatality. The problem is diminishing the quality of life and making our community park resources off limits to most residents. The prominence of brown bears on hillside has resulted in local schools restricting outdoor activities and busing our young athletes across town to Kincaid Park. Bears are habituated to our urban environment and the lack of significant hunting pressure may be contributing to aggressive behavior and the bear's lack of fear of humans. This proposal is a reasonable small step in addressing this issue.

PROPOSAL 2 – 5 AAC 85.20 Hunting seasons and bag limits for brown bear.

Conditional Support

The brown bear population in Anchorage is creating undue risk within our community. It is only a matter of time before we have a fatality. The problem is diminishing the quality of life and making our community park resources off limits to most residents. The prominence of brown bears on hillside has resulted in local schools restricting outdoor activities and busing our young

Comments to Alaska Board of Game, Rick Rogers, February 12, 2009

athletes across town to Kincaid park. Bears are habituated to our urban environment and the lack of significant hunting pressure may be contributing to aggressive behavior and the bear's lack of fear of humans. This proposal is a minor improvement over current regulations; however proposal 1 is preferred as it takes a more aggressive step in addressing this issue.

PROPOSAL 3- 5 AAC 85.20 Hunting seasons and bag limits for brown bear.

Conditional Support

The Brown bear population in Anchorage is creating undue risk within our community. It is only a matter of time before we have a fatality. The problem is diminishing the quality of life and making our community park resources off limits to most residents. The prominence of brown bears on hillside has resulted in local schools restricting outdoor activities and busing our young athletes across town to Kincaid Park. Bears are habituated to our urban environment and the lack of significant hunting pressure may be contributing to aggressive behavior and the bear's lack of fear of humans. This proposal is a minor improvement over current regulations; however the proposal is limited to the Eklutna lake area. Proposal 1 is preferred as it takes a more aggressive step in addressing this issue.

PROPOSAL 5- 5 AAC 85.045 Hunting seasons and bag limits for moose.

Support

A benefit of this proposal that is not mentioned is the contribution the over abundance of Moose in the Anchorage bowl is having on the brown bear problems in the city. The unbridled moose population is creating easy food source for brown bear and exacerbating the urban bear issues. The Brown bear population in Anchorage is creating undue risk within our community. It is only a matter of time before we have a fatality. The problem is diminishing the quality of life and making our community park resources off limits to most residents. The prominence of brown bears on hillside has resulted in local schools restricting outdoor activities and busing our young athletes across town to Kincaid Park. Moose calves are providing an abundant food source for brown bears. This proposal is a improvement over current regulations, as it is a start at addressing the overpopulation of moose in our community.

PROPOSAL 6- 5 AAC 85.045 Hunting seasons and bag limits for moose.

Support

Comments to Alaska Board of Game, Rick Rogers, February 12, 2009

A benefit of this proposal that is not mentioned is the contribution the over abundance of moose in the Anchorage bowl is having on the brown bear problems in the city. The unbridled moose population is creating easy food source for brown bear and exacerbating the urban bear issues. The brown bear population in Anchorage is creating undue risk within our community. It is only a matter of time before we have a fatality. The problem is diminishing the quality of life and making our community park resources off limits to most residents. The prominence of brown bears on hillside has resulted in local schools restricting outdoor activities and busing our young athletes across town to Kincaid Park. Moose calves are providing an abundant food source for brown bears. This proposal is a improvement over current regulations, as it is a start at addressing the overpopulation of moose in our community.

PROPOSAL 7- 5 AAC 85.045 Hunting seasons and bag limits for moose.

Support

A benefit of this proposal that is not mentioned is the contribution the over abundance of moose in the Anchorage bowl is having on the Brown bear problems in the city. The unbridled moose population is creating easy food source for brown bear and exacerbating the urban bear issues. The brown bear population in Anchorage is creating undue risk within our community. It is only a matter of time before we have a fatality. The problem is diminishing the quality of life and making our community park resources off limits to most residents. The prominence of brown bears on hillside has resulted in local schools restricting outdoor activities and busing our young athletes across town to Kincaid park. Moose calves are providing an abundant food source for brown bears. This proposal is to reauthorize current regulations that are part of needed effort to address the overpopulation of moose in our community.

PROPOSAL 8- 5 AAC 85.045 Hunting seasons and bag limits for moose.

Conditional Support

A benefit of this proposal that is not mentioned is the contribution the over abundance of moose in the Anchorage bowl is having on the Brown bear problems in the city. The unbridled moose population is creating easy food source for brown bear and exacerbating the urban bear issues. The brown bear population in Anchorage is creating undue risk within our community. It is only a matter of time before we have a fatality. The problem is diminishing the quality of life and making our community park resources off limits to most residents. The prominence of brown bears on hillside has resulted in local schools restricting outdoor activities and busing our young athletes across town to Kincaid Park. Moose calves are providing an abundant food source for brown bears.

Comments to Alaska Board of Game, Rick Rogers, February 12, 2009

Proposal 5 is preferred over this proposal as proposal 5 mandates sufficient permits to actually make a significant progress in controlling moose population.

PROPOSAL 9- 5 AAC 85.045 Hunting seasons and bag limits for moose.

Support

A benefit of this proposal that is not mentioned is the contribution the over abundance of moose in the Anchorage bowl is having on the Brown bear problems in the city. The unbridled moose population is creating easy food source for brown bear and exacerbating the urban bear issues. The brown bear population in Anchorage is creating undue risk within our community. It is only a matter of time before we have a fatality. The problem is diminishing the quality of life and making our community park resources off limits to most residents. The prominence of brown bears on hillside has resulted in local schools restricting outdoor activities and busing our young athletes across town to Kincaid Park. Moose calves are providing an abundant food source for brown bears. This proposal is to reauthorize current regulations that are part of needed effort to address the overpopulation of moose in our community.

PROPOSAL 10- 5 AAC 85.045 Hunting seasons and bag limits for moose.

Support

A benefit of this proposal that is not mentioned is the contribution the over abundance of moose in the Anchorage bowl is having on the brown bear problems in the city. The unbridled moose population is creating easy food source for brown bear and exacerbating the urban bear issues. The Brown bear population in Anchorage is creating undue risk within our community. It is only a matter of time before we have a fatality. The problem is diminishing the quality of life and making our community park resources off limits to most residents. The prominence of brown bears on hillside has resulted in local schools restricting outdoor activities and busing our young athletes across town to Kincaid Park. Moose calves are providing an abundant food source for brown bears. This proposal is to reauthorize current regulations that are part of needed effort to address the overpopulation of moose in our community.

PROPOSAL 11- 5 AAC 85.045 Hunting seasons and bag limits for moose.

Support

A benefit of this proposal that is not mentioned is the contribution the over abundance of moose in the Anchorage bowl is having on the brown bear problems in the city. The unbridled moose population is creating easy food source for brown bear and exacerbating the urban bear issues.

Comments to Alaska Board of Game, Rick Rogers, February 12, 2009

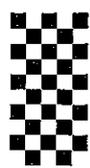
The Brown bear population in Anchorage is creating undue risk within our community. It is only a matter of time before we have a fatality. The problem is diminishing the quality of life and making our community park resources off limits to most residents. The prominence of brown bears on hillside has resulted in local schools restricting outdoor activities and busing our young athletes across town to Kincaid Park. Moose calves are providing an abundant food source for brown bears. This proposal is to reauthorize current regulations that are part of needed effort to address the overpopulation of moose in our community.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Rogers", with a long horizontal flourish extending to the right.

Rick Rogers



Date: February 12, 2009

TO: Alaska Board of Game, Board Support Section  
PO Box 115526  
Juneau AK  
99811-5526

FROM: Todd Adams  
PO Box 674  
Nenana AK  
99760

RE: Revision of 5ACC 92.085 – Proposal 244

To Whom It May Concern:

I am opposed to the revision as proposed. I feel it is too broad in its scope. Lawmakers and enforcement could misinterpret “full metal jacket” and outlaw normal hunting ammunition. I believe we would be opening a door to a test of legal definitions with anti-hunters financing the mission.

Thank You,

Todd Adams

PO Box 766  
 Talkeetna, AK 99676  
 January 31, 2009

ATTN: BOG COMMENTS  
 Alaska Department of Fish and Game  
 Boards Support Section  
 P.O. Box 115526  
 Juneau, AK 99811-5526

Via Fax: 907-465-6094

Board of Game:

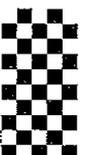
These are my comments on the proposals slated for the Spring 2009 BOG meeting, February 27 through March 9, 2009. I am commenting as someone who spends a lot of time in unit 13E, and have had a recreational cabin there for many years. I am also commenting as a frequent user of Denali State Park. From these perspectives, I am directly impacted by BOG decisions in this unit.

**Proposal 114: OPPOSE** This proposal would extend, between the Gold Creek bridge and the mouth of the Talkeetna River, the western boundary of the predator control area to the west bank of the Susitna River. **I urge the BOG to deny this proposal for the following reasons.**

First, this proposal would extend the Unit 13E predator control area into Denali State Park. The current western boundary of the predator control area is the railroad tracks. The eastern boundary of Denali State Park is the railroad tracks, and so moving the boundary of the predator control area to the west means that it would encompass part of Denali State Park. The management goals of Denali State Park are pretty much the exact opposite of the management objectives of a predator control area. It is entirely inappropriate for intensive/airborne hunting to occur in Denali State Park.

People visit Denali State Park largely for its wilderness character, scenic vistas, and the chance of seeing wildlife. I have seen a wolf in Denali State Park, and it was an exciting and memorable experience. That's what parks are for... to offer that folks that kind of experience. **Intensive/airborne hunting, whether shooting from the air or landing and shooting, is the antithesis of what a park is all about and it should not be allowed to occur there.**

Second, predator control should not occur in areas where people live and recreate in relatively high concentrations. There are a lot of folks who live and recreate north of Talkeetna east and west of the railroad tracks. Instead of moving the boundary of the predator control area to the west, it actually should be moved to the east, away from people. Furthermore, the Indian River State Recreation Area is within the Unit 13E predator control area. This SRA is managed by Division of Parks and Outdoor Recreation under the same management plan as Denali State Park. The Indian River SRA should be excluded from the predator control area. I realize that 1. moving the predator control boundary to the east and 2. excluding the Indian River SRA is not part of the BOG proposal package for this meeting. If you do not have the authority to act on either of 1. or 2. at this meeting, the least you can do is deny proposal 114.



**Proposal 75: OPPOSE** This proposal would allow baiting of brown bears in the Unit 13E predator control area. This baiting permission would presumably include an extended predator control area if Proposal 114 were adopted. **I urge the BOG to deny this proposal for the following reasons.**

First, this proposal would allow baiting of brown bears in the Indian River State Recreation Area, which is managed under the Denali State Park Management Plan, and if Proposal 114 were adopted, within Denali State Park.

The Denali State Park Management Plan on page 69 states: "Work with ADF&G and propose to the Board of Game that the park be closed to bear-baiting." The Management Objective is "Avoid human-bear confrontations. Eliminate a hunting practice in the park that teaches bears to associate humans with food sources." The Justification is: "Bear baiting involves placing edible garbage piles to attract bears. The bears are then harvested by hunters. The practice has the potential for creating serious human-bear conflicts, by encouraging bears to associate campgrounds and other human congregation points with food sources." Baiting of black bears is not allowed in Denali State Park. Baiting of brown bears should likewise be prohibited.

Second, bear baiting, whether black or brown, should not be permitted in areas where people live and recreate in relatively high concentrations. There are a lot of folks who live and recreate north of Talkeetna east and west of the railroad tracks. Therefore, the boundary of the predator control area should be moved to the east, away from people. Furthermore, the Indian River State Recreation Area is within the Unit 13E predator control area. A state park unit should not be in a predator control area, and therefore, the Indian River SRA should be excluded from the predator control area. I realize that 1. moving the predator control boundary to the east and 2. excluding the Indian River SRA is not part of the BOG proposal package for this meeting. If you do not have the authority to act on either of 1. or 2. at this meeting, the least you can do is deny Proposal 75.

**Bear baiting represents a clear public safety issue, and it should not be allowed in park units and it should not be allowed where people live and recreate.**

Proposals 73 and 74: These proposals would extend black bear baiting season to June 30 within Units 11 and 13. Even though, within Denali State Park, the "hunting of black bear over bait is prohibited," the proposal contains no reference to this prohibition. To ensure no misunderstanding, the prohibition of baiting black bears in Denali State Park, including the Indian River State Recreation Area, should be made clear in the proposal.

Proposals 76 and 79: These proposals increase the bag limits on brown bears within Unit 13. There is no exclusion for Denali State Park (and the Indian River State Recreation Area). There should be such an exclusion.

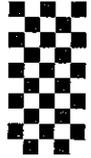
Sincerely



Ruth D. Wood

2

Public Comment # 134



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February 11, 2009

FEB 12 2009

BOARDS

Alaska Board of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526

FAX #: (907) 465-6094

RE: Proposal #244

Gentlemen;

I personally object to the definition of "jacketed" bullets of all calibers in the State of Alaska defined in proposal #244 on page 218 of the Fish and Game Board Proposal book.

It is my wish that you totally disregard this proposal based on the lack of research that apparently has been done resulting in the terminology that jacketed bullets applies to many of our most popular gun manufacturers.

Thank-you for your consideration.

Jay A. Spracklen  
P.O. Box 190  
Nenana, AK 99760

February 5, 2009

Alaska Board of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

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Subject; Board of Game  
Proposal #244 on Page #218  
And footnote on Page #217

Gentlemen:

In going over proposal #244, I recognized some terminology that I feel should be addressed. The language that states "all 223 jacketed ammo should not be used for big game hunting" is somewhat ambiguous. The state has extended it to all Game Management Units and all jacketed rounds of any calibers.

This is a problem that maybe should be addressed as a local concern in those GMU's. The terminology "jacketed" when used in reference to them is sometime a misleading nomenclator. Commercial manufactured bullets that are everyday hunting loads are jacketed but of a structure to allow it to expand and complete its' mission in dispatching the animal. Without going into a lot of ballistic jargon, I will let it go at this time.

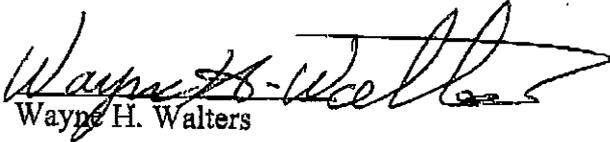
This or any caliber, being shot from an unstable platform like a motor vessel is not the ideal scenario for being productive. Structher of the projectile and bullet placement is the formula for success. I do believe that we can not legislate ethics into people. There is a program that the state provides for the general public called "HUNTER EDUCATION" which I happen to be an instructor in. I also have five more pedigrees in the art of fire arm instruction.

Another one of my concerns is that the people that live in the bush use copious amounts of this type of ammo, thereby eliminating damaged hides and meat. I do believe that there would be a certain amount of hardship as the result of this proposal.

I hope we do not get ourselves too-blocked and are not able to use lead bullets before long. Enclosed you will find some interesting reading as to what California is doing in reference to not being allowed to use lead bullets. We already have a ban on the use of lead shot in shot guns when hunting waterfowl. There is also a move aloft to totally stop the use of lead in any type of hunting in the state of Alaska.

In summation, I believe there is cause for a lot more consideration on this issue before implementation of this regulation. I am not sure what the magic words are to get all concerned parties together to make a knowledgeable decision, but if I can help, please feel free to call on me at the phone number below. What I have purveyed to you in this letter is just a miniscule amount of info that is available.

Respectfully;

  
Wayne H. Walters

Enclosure: Gun Trader article

cc: Rita St. Louis

Wayne H. Walters  
P.O. Box 326  
Nenana, Alaska 99760  
Phone 907-582-2662

### RECORDS

## Minnesota Will Require X-Rays of Venison

Minnesota's Department of Agriculture recently decided that all venison donated to food shelters through the state's Harvested Venison Donation Program must undergo x-ray testing. Testing will cost approximately 30 cents per pound and might lead to the elimination of the program currently providing over 20,000 pounds of venison to food pantries annually. Hunters have

been feeding their families with deer taken by lead bullets since firearms were invented. "I did Rick Story, senior vice president of the pro-hunting U.S. Sportsmen's Alliance. People have simply not contracted lead poisoning from wild game." The x-ray decision came after state studies indicated that 5.3 percent of program venison contained some lead.

## Anti-Gun Mayors Promote Gun Law Report

The anti-gun group, Mayors Against Illegal Guns, recently had a report it commissioned covered by the Washington Post. According to the Post, states with lax gun laws had higher rates of handgun killings, fatal shootings of police officers, and sales of weapons that were used in crimes in other states, according to a study undertaken by a group of more than 300 U.S. mayors. However, the Post's coverage included no response or rebuttal by pro-gun groups. The firearms industry, or even individual gun owners, soon a December 5 letter to the Post, Stephen L. Sarnetti, President of the National Shooting Sports Foundation, set the record straight. As Sarnetti noted, according to the Bureau of Alcohol, Tobacco, Firearms, and Explosives, firearms traces are in no way an indicator of criminal wrongdoing by any licensed firearms dealer or retail purchaser. Under the logic of these mayors, tracing a car brought into a city and later used by a drunk driver would implicate the rural dealer who lawfully sold the car years ago. He added that, "Federal law requires all licensed firearms retailers to run FBI background checks on every gun sold (including sales at gun shows)." As far as states having "lax gun laws," Sarnetti contended they actually had "more moderate gun laws, and this moderation, reflected the will of the people and the considered judgment of their elected officials concerning lawful firearms sales, ownership and use."

## Virginia Gun Show Background Checks—No Action For The Time Being

The Virginia State Crime Commission put off a decision on whether or not to recommend legislation closing the so-called gun show "loophole." However, the Commission promised to do so before the General Assembly convenes in January, the Washington Times noted. "Proposals to require background checks of private buyers at gun shows have been made for the past five years, but the effort gained fury last winter when the Virginia Tech families got behind it. Despite that support, legislators killed the bill and sent it to the Crime Commission for study."

At a public hearing, Philip Van Cleave, president of the Virginia Citizens Defense League, told the commission that even with gun show background checks, the Virgin-

## California To Expand Condor Range Lead Ban

In 2008, big game hunters across much of southern California had to use non-lead ammunition or not hunt at all, a move that state officials said would help endangered condors. Now that lead ban will expand. According to the Los Angeles Times, "A ban on hunting with lead ammunition within the California condor's 2,385-square-mile range will be expanded to prohibit its use in the shooting of small nuisance animals, according to a settlement announced last week by environmentalists and state wildlife authorities."

It gets worse. "Under terms of the settlement, the commission has agreed to consider prescribing a similar regulation against using the toxic metal for hunting of small mammals such as rabbits, opossums and tree squirrels," said Adam Keats, a spokesman for the Center for Biological Diversity. Yet, apparently, all that's not even good enough for some. "Until the supply of lead ammunition is completely choked off, it will be really hard to ensure the safety of condors," said Noel Snyder, a retired field biologist for the U.S. Fish and Wildlife Service. "That is because, lead will continue to come in as people hunt around the edges of their territory." Despite conflicting evidence, the state agreed with emissaries who contend that condors are being poisoned via hunter-lead fragments in gut piles.



## U.S. Army Marksmanship Shooting Coach Retires

U.S. Army Marksmanship Unit (USAMU) coach Frank Briggs has retired. International Rifle Team coach and former head coach of the International Pitrol and Service Rifle teams, Briggs retired

and sent many Soldiers to the Olympics. A former U.S. Marine Corps captain, Briggs headed up the Marine Corps International Shooting Team, plus was a member of the U.S. Shooting Team that



ATTN: Bog Comments  
Alaska Dept of Fish & Game  
Boards Support Section  
P. O. Box 115526  
Juneau AK 99811-5526  
Fax: 907-465-6094

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BOARD

RE: SHEEP PROPOSAL #218 Page 177

Board of Game

I support Proposal #218 to modify the season dates for Dall Sheep for all of Region II.

Residence of Alaska should be allowed access to Sheep hunting 5 days prior to nonresident hunters. This will relieve congestion at air strip drop off and pick up points as well as provide air transport operators additional trip opportunities.

I believe this change will also increase hunt quality for both Alaskans and nonresidents as many Alaskans will out of the field when the nonresidents arrive. I do not think this will deter out-of-state hunters.

Thank You

Marty Laudert  
3238 Edby Rd  
Fairbanks AK 99709  
907 474 8083

Governor Sarah Palin  
P.O. Box 11001  
Juneau, AK 99811

Mr. Denby Lloyd  
Commissioner –ADF&G  
P.O. Box 115526  
Juneau, AK 99811

Alaska Board of Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811

Mr. Neil Barten  
Area Biologist – ADF&G  
Douglas, AK

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July 30,2008

I am writing this letter in reference to the letter/petition dated July 12, 2008 which is unsigned and posted as a petition by the residents of Gustavus. I am a resident of Gustavus/Juneau and initially volunteered and was voted in as an advisory board member. Presently, there are no advisory board members from Gustavus on the Icy Straits board due to the lack of elections to the board. All past member terms have expired.

This petition asks for a subsistence designation for the Gustavus moose hunt and notes that there were no public hearings on this designation. First of all, this is a review process by the ADF&G subsistence division. Using a statewide evaluation process to recommend to the Board if an area meets the requirements of a historical/traditional use. Gustavus did not meet these requirements. At the initial meeting to restart the Gustavus advisory board in early 2000 this idea was brought up and was negatively received when the Tier 2 requirements were outlined by Neil Barten and Art Hayes, ADF&G employees. Presently, the citizens of Gustavus are not informed on how the Tier 2 system works: this system is divisive in communities that have adopted this type of management type. Much of the state areas with Tier 2 systems have worked to get away from this management method. I feel that if the signees of this petition knew what they were asking for; they would not sign this proposal. Prior to writing this proposal the authors of this petition should have described the management system presently in use for subsistence designated areas to the signees of this petition. They should also note that the resources of the State are equally allocated to the citizens under the State constitution; they are not set aside for local control.

Additionally, the petition asks for cancellation of the cow moose hunt in Gustavus. Every year this petition seems to come out and is signed predominately by individuals that do not take the time to attend the bi-yearly moose meetings given in Gustavus by ADF&G biologists Neil Barten & Kevin White. Secondly, there are informed individuals and prior advisory board members that do not accept the current moose and browse biological data that ADF&G biologist have accumulated with much work and monetary resources on this population. This data has been interpreted by all the leading moose biologists within the State as unanimously designated as a population in distress due to high utilization of its wintering ground. Recommendations by the leading moose biologists have called for higher cow moose quotas to lower herd numbers the past several years; then were allotted mainly due to local political reasons. Nothing is different with this year; same petitions and the same lower cow quota than what is recommended by those that have studied this situation in other areas of the state.

The Gustavus herd, from what I have observed in the field and by looking at biological data from ADF&G biologists dodged a bullet during the winter of 2006/2007; with the help of the unpopular work/commitment by ADF&G staff. I commend them on their work ; and hope in the future they can continue without all the political interference.

Signed,

*Mark Ortega*  
Mark Ortega

M. ORTEGA  
P.O. Box 218  
GUSTAVUS, AK 99826

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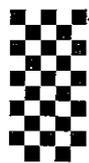
AUG 05 2008

BOARDS

ALASKA BOARD OF GAME  
BOARDS SUPPORT SECTION  
P.O. Box 115326  
JUNEAU, AK 99811

Public Comment #

138



Janice Tower  
7645 Griffith Street  
Anchorage, AK 99507  
907-346-1374 jtower@alaska.com

February 11, 2009

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FEB 12 2009  
BOARDS

ATTN: BOG COMMENTS  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Please accept my comments on the Board of Game regulations proposals.

**PROPOSAL 1- 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Support**

A fall hunt would open hunting opportunities for those who enjoy hunting, and reduce by a small measure the number of brown bears in the Chugach range. Brown bears emboldened to venture into the Anchorage metropolitan area might change their behavior once hunting pressure is applied.

**PROPOSAL 2 - 5AAC 85.020(13). Hunting seasons and bag limits for brown bear. Support**

Allowing a fall hunt in the Eagle River drainage will increase opportunities for hunters and the odds for obtaining a brown bear. Drawing from the success of the black bear hunt in reducing the number of negative black bear/human interactions, it would follow that problem or overly aggressive brown bears would be removed with similar results. Extending the hunting season would improve the odds of a brown bear being taken.

**PROPOSAL 3 - - 5AAC 85.020(13). Hunting seasons and bag limits for brown bear. Support**

See reasons above for proposals 1 and 2.

**PROPOSAL 5 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Support**

I am in favor of increasing bag limits for moose. Moose are a healthy resource in the Anchorage area. Since no moose hunting is allowed in the municipality, the only source of moose control in the city are motorists. Motorists are injured and sometime killed annually by an overly abundant, habituated moose population on Anchorage roadways. I am also in favor of reducing Anchorage's moose population because they serve as an essential food source for protein-hungry brown bears. If we reduce the brown bears' food source in Anchorage we will reduce the number of bears in the Anchorage bowl and decrease the likelihood of charges and maulings.

**PROPOSAL 6 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Support**

I support moving the archery season to November to avoid over-harvesting moose in rut.

**PROPOSAL 7 - 5 AAC 085.045(12). Hunting seasons and bag limits for moose. Support**

See reason of support in Proposal 6. This needs to be reauthorized to prevent an overpopulation of moose in his area and to reduce the food source for brown bears.

**PROPOSAL 8 - 5 AAC 85.045(12). Hunting seasons and bag limits for moose. Support**

See reason of support in Proposal 7. We need to keep the moose population to a minimum healthy level.

**PROPOSAL 9 - 5 AAC 085.045(12). Hunting seasons and bag limits for moose. Support**

Again, this will reduce negative human/moose encounters resulting in injury or death on our roadways.

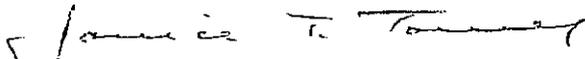
**PROPOSAL 10 - 5 AAC 085.045(12). Hunting seasons and bag limits for moose. Support**

Same as Proposal 9.

**PROPOSAL 11 - 5 AAC 85.045(12). Hunting seasons and bag limits for moose. Support**

See above.

Respectfully Submitted,

  
/Janice Tower



Alaska State Board of Game  
Care of Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526  
FAX: 907-465-6094

February 12, 2009

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FEB 12 2009  
BOARDS

Proposal 244 written testimony

Greetings:

I am the Petitioner of Proposal 244 and regret the action I took filing the petition. Please allow me to provide a recommendation that serves the public interest in more ways than my original intent.

The original intent of Proposal 244 was an attempt at reducing the loss of big game shot with 223 caliber full metal jacketed bullets. The real problem stems from individuals shooting from boats at primarily deer in the Sitka, Alaska area. In other words, the problem I was trying to address is the loss due to individuals who are using the wrong judgment by shooting from boats with small caliber semi-auto firearms with full metal jacketed bullets.

The Board action to create a state wide ban of all full metal jacketed bullets will become more contentious than first considered. I fear the issue of gun use regulation is at risk of superseding game management.

I hunt small game with full metal jacketed bullets and know that in many regions of Alaska the 223FMJ is used for caribou harvest.

Most if not all board members have had either military or some form of hunter education. Most of you learned your hunting ethics from other family members. We have to acknowledge that some citizens have not had that opportunity and the real risk is the loss of Alaska big game is to individuals who just do not know any better.

Alaska has matured as a State and should require hunter education for all types of hunting licenses. The issue I was trying to address in Proposal 244 really boils down to hunter knowledge and ethics. The public interest is better served having citizens who begin their hunting career with a fundamental understanding of gun safety, hunter ethic and the law.

Alaska State Board of Game  
Proposal 244 written testimony

February 12, 2009

Technology provides great opportunities to implement an education program for the State of Alaska. A simple, on-line proficiency test would be an economical means for the State to manage hunter education programs.

The implementation of a volunteer hunter education program is another recommendation. An individual documents their proficiency or prior education and then obtains a discount of say \$5 towards the annual license fees.

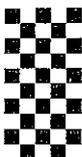
I respectfully request the Board to withdraw Proposal 244 and instruct the Game Board Support Section to evaluate and make suggestions regarding instituting a state wide hunter education program.

I respectfully request the Board to withdraw Proposal 244 on administrative grounds. The only public disclosure for statewide ban is the italic type introducing Proposal 244 on page 217 of the "Green Book". Proposal 244 as written has nothing to do with a state wide ban of all calibers. My name being identified with the Board amended Proposal 244 is very upsetting to me. I respectfully request the Board to strike my name from any association of a state wide ban and the Board discloses their intent in a properly executed proposal for public comment.

Respectfully submitted,



Bradley L. Shaffer



Attn: BOG Comments

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

RECEIVED

FEB 11 2009

BOG

**Proposal #52**

Support: This will allow a better opportunity for a bear harvest because they are more likely to be concentrated on the rivers. An unexpected by-product of this proposal may be a more ethical and safer kill on larger more mature bears.

**Proposal #61-option 1**

Support: I arrived in Dillingham, Alaska, August 28, 2008, because of the mandatory personal pick-up "moose permit policy". This permit needed picked up by the last day of August. Being I was flying in from Pittsburgh, Pa, and the last day of the month fell on a Sunday, this required that I be in Alaska for a full week ahead of moose season. Seven days after my arrival, "permit #16", began hunting Alaskan moose.

However, during those first seven days, the bear sign was tremendous because the fish were still on the river. Just prior to moose season, it began raining, the rivers rose, the bears left, and the moose had already been intimidated off the river corridors.

I believe the most frustrating part of this policy is its poor concept. During my three weeks on the Nushagak, I saw seven boats. Two of the boats were local hunters and the rest just passed through. I even spoke with one local gentleman who said he never wasted his time hunting on foot, he just float hunted.

I came to Alaska to fulfill my dreams. Please give this proposal your sincere considerations so I can someday watch my sons and grandsons realize their dreams, just as I have done.

Thank you  
Barry C Barton  
Vice President, Penn United Technology

Public Comment # 141

**Comments from the Cantwell High School students received January 29, 2009**

<b>Proposal #</b>	<b>Description</b>	<b>Student Vote</b>	<b>Discussion</b>
Proposal 73	Lengthen baiting season to June 30 in 13E	7-0-1 Support	There is a lot of snow which makes it difficult to get around.
Proposal 76	Increase bag limit to 2 per year in 13E	6-1-1 Support	It is true that those animals are getting depleted by predation on grizzly. Limit should be at one so animals don't get wiped out.
Proposal 91	Modify salvage requirement in 13	7-0-1 Support	This is so true. Not all parts can be eaten and not all parts are currently being used. Leaving the parts in the field will allow other animals to consume them without creating a scavaging animal problem in town. Bringing it out of the field attracts bears to the waste. Because a person hunts for subsistence purposes, they shouldn't be discriminated against.

These proposals were submitted by the Denali Fish & Game Advisory Committee. As part of a presentation on the Board processes, Sherry Wright asked for comments from the students at the Cantwell High School in Ms Hauschka's Government class.

RECEIVED TIME FEB. 13. 11:15AM

I am stating my total opposition to the draconian regulations that are being proposed to further limit and effectively eliminate sport fishing in Southeast Alaska.

For the past thirteen years I have come to Alaska to fish for one week. This requires that I expend considerable sums of money in your state for travel, food, lodging, licenses, fuel, incidentals and guide services. The overwhelming majority of this annual expenditure is in the State of Alaska.

The goal of my trip is to enjoy a week of fishing and to return home with a reasonable catch of salmon and halibut.

The recent new restrictions on the halibut and King Salmon catch have caused me to seriously consider the merits of my annual trip. I can assure you that the new proposed limits affecting silver salmon as to limits and fish in possession, if enacted, will spell the end of my trips and expenditures in Alaska.

It is my opinion that these existing and proposed regulations represent a reprehensible attempt by commercial fishing interests to monopolize resources that, in my view, should be shared with all citizens of the country. It is a clear and indefensible attack on the charter fishing industry, non-resident fishermen, for the benefit of a few. Additionally the collateral damage to businesses that support the sport fishing industry will be substantial. We are in a period of economic distress

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Public Comment #

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*Fiesta Farms**Jim Dal Bon**Elaine Dal Bon*

where the competition for discretionary spending on recreational activities is already intense. It is difficult to understand how your agency could justify a further negative impact on the thousands of Alaskan small enterprises that depend on and support the charter fishing business.

I have fished with the same guide every year. He is professional and scrupulous in observing regulations and laws governing our fishing. We never take more than our legal share and we respect the resource. We have fished on many occasions in visual proximity to commercial net boats and trolling boats. Frankly I have been appalled at the manner in which commercial fishermen handle fish. Additionally I have been stunned by the overwhelming numbers of salmon taken by just one commercial vessel relative to the catches of two dozen sport-fishing boats. I have witnessed uncounted thousands of salmon harvested in one pull of the net with a large percentage of the fish disposed of and left to die. It is inexcusable that an industry that already monopolizes the resource to such a degree blatantly proposes to totally control this public resource.

I strongly urge you to reject these proposed regulations and to restore the sport fishing limits that were in effect prior to 2008.

Thank you for your consideration.



Jim Dal Bon

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Public Comment #

143





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## **COMMENTS ON CHANGES TO THE UNIT 19D EAST PREDATOR CONTROL IMPLEMENTATION PLAN**

### **RENEWAL OF THE PROGRAM**

In 2008, Defenders submitted a proposal to the Alaska Board of Game ( Proposal Number 106 for consideration at the March 2008 meeting) recommending suspension of wolf control in Game Management Unit 19D East. Our analysis indicated that the initial justification for the program was flawed. It overestimated subsistence demand for moose in the area and underestimated subsistence harvests. The initial moose population estimate (850) that the planning team used in 2000 to recommend predator control was just a fraction of the actual number of moose present (3,600) as revealed by a valid census in 2001. The “crisis” resulting from critically low moose numbers never actually existed. The 3,600 moose in the area were adequate to provide subsistence requirements through sustainable harvests for local residents.

We also analyzed wolf removals from the area during 2003-2007 by permittees with control permits to aerial hunt wolves. This indicated that only 45 wolves were taken from a pre-control population of 198, too few to reduce the effects of wolf predation as a limiting factor for moose.

Although moose calf survival and the moose population in the EMMA both increased during 2003-2008, this was due to removal of bears during the moose calving season, not reduction of wolves. The EMMA (528 square miles) is only 6% of the total land area in Unit 19D East (8,500 square miles).

We concluded that there is no evidence that significantly more moose are available to hunters outside the EMMA as a result of wolf control, and there is no indication that continued control will produce more moose. In short, wolf control has not “worked” and the McGrath wolf control program should be terminated.

Accordingly, we oppose reauthorizing the implementation plan. Nevertheless, a revised plan has been drafted and will be considered by the Board at its March 2009 meeting. We offer the following comments.

The revised plan proposes establishing a 4,600 square mile “Wolf Control Focus Zone” in which to concentrate wolf control actions, and the Department would have discretion to adjust the size and shape of the zone as it sees fit.

Originally, wolf control at McGrath was to occur only within the EMMA. This was expanded to 1,728 square miles when it was discovered that certain wolf packs using the EMMA ranged outside it. This was again expanded to 3,210 square miles in 2006 and enlarged again after 2006 to 6,245 square miles. Not only did this violate the original intent of the program to confine wolf control activities to the EMMA, but it also added an element of confusion in monitoring and evaluating results of the control effort. How can a valid, scientific effort to determine the effects of removing wolves on moose population growth occur if the area in which control is conducted is constantly shifting and inconsistent over time? We recommend that the original 1,728 square mile area be declared as the focus zone and if the revised plan is adopted, this area shall remain unchanged for the plan’s duration.

#### **National Headquarters**

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Reference is made to a 2004 aerial moose survey that yielded an estimate of 4,374 moose in comparison to 3,959 moose from the 2001 survey (these estimates are not significantly different). However, the Department summary of the 2004 census cautioned that survey conditions were poor and the survey was terminated before the entire area was searched. The Department itself warned that the resulting moose population was unreliable, yet it is still cited.

No moose population estimates have occurred in recent years. Given the problems with the 2004 survey, the last reliable moose census is from 2001. A severe winter in 2004 resulted in widespread starvation of moose in the McGrath area. Thus it is not known how many moose occur in Unit 19D East at present. The implementation plan does not speak to the importance of conducting moose censuses at regular intervals to monitor the effects of predator control. We strongly recommend that moose censuses occur at 3-year intervals throughout the life of the program and that these censuses replicate the 2001 census in area and scale for consistency.

The 2001-2008 moose harvest in Unit 19 is variously listed as 60-103 or 60-98. This should be clarified.

The revised plan indicates that no black bears were taken by control permittees and only 3 brown bears were taken by permittees in 2008 in the bear control area. This indicates the failure of the bear control provisions adopted by the Board to harvest more bears in an attempt to reduce predation on moose calves. Not only should the wolf control program be suspended for lack of effectiveness, but it appears that the bear control program should be suspended as well.

The revised plan indicates that wolves within the Wolf Control Focus Zone (4,600 square miles) should be reduced to "...the lowest level possible..." We interpret this to mean that wolves will be eliminated from this area which constitutes over one half on Unit 19D East. We note again that the original intent of this program was to reduce wolves only within the EMMA (6% of the unit). We also note that the McGrath program departs from all the others where about 20% of the wolves are spared. No explanation is given as to why there is a need to eliminate all wolves as opposed to 80 percent. We suggest that sparing 20% of the wolves would not significantly change moose survival rates (and ultimately moose population growth) and thus alter the benefits, if any, of the wolf control program.

In 2008, moose hunting in the EMMA was re-opened. The original plan was to close the hunting season in 2003 in the EMMA to allow the moose population to increase at the highest possible rate if predator control worked. The season remained closed for five years. Although it is now claimed that moose have increased, the magnitude of the increase is still relatively small. We recommend that the moose hunting season within the EMMA should be closed for the duration of the predator control program if it is reauthorized.

We strongly recommend that the Unit 19D East predator control program should end and that this plan should be rejected by the Board. The revised plan contains some worrisome elements including yet another revision of the area in which control takes place. This adds a confounding element to an already difficult to evaluate control program. The 1997 National Research Council report warned that past control programs in Alaska had uncertain outcomes because monitoring protocols were inadequate. At this juncture, the Board should take actions to heed the NRC's advice, not ignore it. Adopting this revised implementation plan is a step in the wrong direction.



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## UNIT 21E ADAPTIVE MANAGEMENT PLAN COMMENTS

In summary, we have strong reservations about several aspects of this proposed plan. First, the plan is labeled as proactive, meaning that the current moose population has not declined to low levels and initiating intensive management wolf control now may prevent a decline. This represents a major departure from past predator control programs that were all in response to sharp declines in ungulate numbers. Indeed, the Intensive Management Statute speaks to restoring depleted ungulate populations, not preventing declines. We regard proactive control programs as opening the floodgates for unlimited wolf control as virtually all ungulate populations in interior Alaska might decline at some future date. We also dispute the plan's definition of "depleted" as not meeting intensive management objectives. This, rather than a biological definition, paves the way for game boards bent on controlling wolves to set objectives at such high levels that ungulate populations are perpetually depleted and wolf control is never-ending.

Second, there is an effort to overstate the problem by underestimating the number of moose that likely occur in the area. This is first done by rounding down the actual estimated numbers in the 2000 and 2005 surveys—5,000 versus 5,151 and 4,500 versus 4,673. This is relatively minor but still acts to reduce the numbers. Then, the population estimates are not corrected for sight ability despite the fact that research has shown the need to correct survey results to account for moose present but not observed. This happens in virtually all moose aerial surveys. In this case, a correction factor as high as 1.4 is indicated. If applied, this would appreciably increase the 2000 and 2005 estimates, 5,151 versus 7,211 and 4,673 versus 6,542. Finally, the moose estimates are mainly cited in the plan without expanding them to the entire unit. Moose were surveyed in an area of 5,070 square miles but the entire unit is 7,997 square miles. By citing the 2000 and 2005 estimates as 5,000 and 4,500 (which are uncorrected and apply to only 63% of the total area), this greatly underestimates actual numbers in the unit which may well be as high as the expanded estimates in all of Unit 21E. The expanded estimates are 11,538 and 10,467 moose, respectively.

We strongly recommend that the moose population estimates in the plan be revised to account for sight ability correction and for moose that occur outside the survey area. When this is done, the plan will much more accurately represent biological realities and the need or lack of need to reduce wolves.

Third, the plan recommends that the Game Board should approve Proposal 239 at the March Board meeting. This would authorize wolf control in Unit 21E despite the fact that no previous wolf surveys have occurred in this area and no estimates of wolf numbers are available. The plan provides wolf population estimates derived from density extrapolations using data from field studies done elsewhere. This cannot possibly provide a valid, accurate wolf population estimate, and makes it impossible to assert that some number of wolves (20% of pre-control numbers) will survive aerial shooting.

We strongly recommend that the Board should table Proposal 239 until the results of the 2009 moose and wolf surveys are available.

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Finally, the plan proposes a new method of beginning and ending wolf control. Rather than rely on the standard practice of comparing population estimates to assess population declines before control or increases after control, critical values are calculated by statistical processes to serve as triggers for starting or stopping control programs. In the Unit 21E plan, the trigger to begin control is 5,648 moose (resulting from the March 2009 survey). This means that control would begin if the survey indicated fewer than 5,648 moose. This is much higher than 4,500, the stated objective. Setting the trigger based on the critical value lowers the bar for beginning control. Similarly, the trigger critical value for ending control is 6,275 (meaning that control would continue unless this many moose or more were estimated from surveys), well above the stated objective of 5,000 moose and likely extending control significantly.

We suggest that this new method of starting and stopping wolf control programs is an attempt to relax existing standards and proceed with control when data obtained from the field do not warrant it. We strongly recommend that wolf control in Unit 21E, if necessary, should only begin if the March 2009 survey indicates a significant decline of moose below 4,500 animals. Given our other concerns listed above, we are skeptical that wolf control is warranted in this area at this time under any circumstances.

### **Detailed Comments:**

The following are comments on the draft management plan titled: “Adaptive Plan For Intensive Management Of Moose In Game Management Unit 21E.” The plan was authored by the Alaska Department of Fish and Game (ADFG) and is dated January 28, 2009.

**Page 4.** The 2005 moose population survey is listed as occurring in February at the bottom of the page but March in the preceding paragraph and in the Executive Summary. The correct month should be clarified.

The approximate confidence limits indicated for the 2005 moose population estimate (7,000-9,000) indicate a mean estimate of 8,000. However, the density estimate obtained (0.9 moose/mi<sup>2</sup>) applied to the total area (7,997 mi<sup>2</sup>) indicates a mean of 7,197 moose (not 8,000). This discrepancy should be clarified.

The various population estimates listed in the survey area versus the entire subunit add an element of confusion to the plan. The intensive management population objective (9,000 to 11,000) is compared to the 2005 estimate (given as 7,000-9,000) and these apply to the entire subunit. But the plan repeatedly refers to the 2000 and 2005 population estimates (4,500-5,000) as objectives. This is confusing, especially given that predator control under intensive management may be ongoing until the IM objective for the entire subunit is achieved.

**Page 5.** Table 1 lists the IM moose population objective for Unit 21E as 9,000-11,000. Listing it as a range of values illustrates a fundamental problem: how to determine when the objective is met. Is it met when there are, e.g., 9,000 or 10,000 moose or must there be 11,000?

Table 1 also indicates an IM harvest objective of up to 1,100 moose. This is 10% of the highest population objective (11,000) and 12% of the lowest (9,000). As indicated elsewhere in the plan, these harvest percentages greatly exceed sustainable harvests for moose in Interior Alaska. This indicates the need to re-evaluate harvest objectives in this and other areas.

Several places in the plan (including on page 5) refer to this as a “proactive” plan to prevent decline of a moose population. If adopted, this would be a departure from past IM predator control programs wherein moose populations declined to low levels and control was thought necessary to re-build them. Indeed, the

IM statute refers to programs designed to "...restore the abundance..." of ungulate populations. This wording is important and provides a standard for the Board such that IM programs are restrained from being applied where and when they are unnecessary. Adopting a "proactive" standard now would pave the way toward applying IM predator control programs to nearly every moose and caribou population in Interior Alaska as it could be claimed that all might decline in the future. We consider this approach ill-advised and dangerous and in need of much more public discussion.

Page 6. This page states that the Department recommends that the Board should adopt a regulatory proposal to authorize a wolf control program in Unit 21E at the March 2009 meeting. We think that this recommendation is premature given the lack of data on certain key elements necessary to justify a control program (specific deficiencies are listed below). Premature adoption of a Unit 21E control program would continue the Board's failure to heed the recommendations of the National Research Council report (1997)—a thorough review of past control programs and a comprehensive set of recommendations for future programs. The Board has failed to follow the NRC's recommendations since the first control programs were adopted in 2003. Failure to adopt the recommendations has led to widespread and well publicized criticism of the control programs by the scientific community. Despite this, the Department now urges the Board to continue its failures. This is most unfortunate.

**Pages 6-7.** The plan recommends issuing aerial shooting permits to private pilots as the primary means of reducing wolves. We object to this, as we do for all other currently active control programs. There are many objections to private pilots conducting wolf control including a proven history of illegal shooting of wolves and wolverines outside control area boundaries. There are humane issues as well. It is known that wounding of wolves occurs. For these and other reasons, we recommend that when wolf control is necessary, it should be conducted by Department personnel using helicopters.

Page 7. Elsewhere in the report it is noted that no wolf population surveys or censuses have been conducted in Unit 21E and there is no wolf population estimate from data collected in that area (an estimate is provided based on a density extrapolation from Unit 19D). Yet a management objective of 40 wolves remaining post-control is derived from a very crude, extrapolated pre-control estimate of 210. Given the crude nature of the extrapolated pre-control estimate, the post-control management objective is meaningless.

One sentence in the plan indicates that a wolf population estimation survey will be conducted prior to aerial shooting. No additional information on specifics of the methods is given. We assume this will be an aerial survey. It is possible that mediocre or poor snow conditions for tracking wolves or unfavorable weather will occur thereby hampering the aerial survey. We urge the Department to wait until a valid and reliable survey of wolf numbers can be conducted before initiating the control program and to not rely on incomplete or poor quality data.

The goal of the wolf reduction effort within the 2,617 square mile "focus area" is "...to reduce the number of wolves to the lowest level possible..." We assume this means zero, if possible. The plan indicates that outside the focus area, wolves will survive such that 20% of pre-control numbers will persist. But absent data on wolf numbers and distribution, it may be that very few wolves exist away from the main concentration areas for moose. These are within the wolf control focus area. Again, a reliable wolf population survey is essential in determining the likelihood that some wolves will survive the control effort.

**Page 8.** The need to evaluate bear predation on moose is noted. Elsewhere in the plan it is mentioned that no brown bear or black bear population estimates are available from data collected within the area.

Estimates are derived from extrapolated densities obtained elsewhere. As with wolves in Unit 21E, this results in the crudest possible estimates that may be worse than none at all. There is also no information on the extent of bear predation on moose in Unit 21E based on field studies there, nor is there any information to rank the relative importance of bear versus wolf predation.

This is reminiscent of the situation at McGrath in 2000. There, local residents reported decreasing moose numbers and increasing wolf numbers with increased predation on moose—exactly the same scenario as in Unit 21E. No information on bear predation on moose was available and local residents focused on wolf predation as being far more important than bear predation. When bears were translocated out of the moose calving areas in 2003 and 2004, moose calf survival doubled. This indicated that bears were more important than wolves in limiting moose population growth. If the same is true for Unit 21E, wolf control may be ineffective as a tool for increasing moose. It is prudent to determine the limiting effects of bear predation on moose by conducting field studies before initiating wolf control. Increased funding for IM programs provided by the legislature in recent years was intended to fund just this sort of effort.

**Page 9.** Results of the March 2005 moose survey are given as 3,897-5,448 observed moose with 18% calves. A calf percentage of 18% in an Interior Alaska moose population is considered high and not indicative of heavy predation. Similarly, calf:cow ratios monitored during November in one area are given as 30-40:100 or higher, again relatively high and not indicative of heavy predation (in moose populations with heavy predation, calf:cow ratios have been observed as low as 10:100). This suggests that factors other than predation are limiting the Unit 21E moose population, but this alternative hypothesis is unmentioned in the plan.

The March 2005 moose population estimate of 4,673 animals is given without correcting for unobserved moose. All aerial moose surveys fail to tally certain moose that are not observed for various reasons. Thus, survey results must be corrected with use of a sightability correction factor if they are to provide realistic estimates of population size.

A correction factor of 1.4 is given as possible for late winter surveys in Interior Alaska. Applying this to the 2005 estimate suggests that 6,542 moose may have been present. This is much higher than the rounded estimate of 4,500 cited in the plan. The corrected population estimate translates to a density of 1.3 moose per square mile, much higher than the uncorrected estimate of 0.9. Citing the lower, minimum numbers makes the situation look worse than it actually is and may underestimate not only the number of moose but also the number available for harvest.

An average twinning rate of 29% (range=16-47%) is given for the Holy Cross area based on spring aerial surveys conducted from 2000 to 2008. Sample sizes of 25-40 female moose comprised these surveys. Such small samples (from a population of 4,500) are unlikely to provide valid estimates of twinning rates, nor do they represent variation in rates among different areas and habitats within Unit 21E.

**Page 10.** Page 10 indicates that information from studies of moose mortality in Unit 19D East (McGrath area) suggests that wolf predation is currently limiting moose in Unit 21E. Given the total lack of data on the number of wolves in Unit 21E, it is impossible to predict the effects of wolf predation on moose, or to assess the similarities and differences of moose-wolf interactions in these two different geographic areas. The claim that the McGrath results can be extrapolated to Unit 21E is totally unwarranted.

This claim is symptomatic of a fundamental assumption that predator control advocates consistently make, namely, that wolf predation is a universal limiting factor of moose populations in virtually all of Interior

Alaska. Research has shown that in most Alaskan cases where moose are limited by predation, bears are at least as important as wolves in suppressing moose numbers. And there are several other factors including hunting, poor quality habitat and severe winters that may limit moose far more often than predation.

**Page 11.** The confusion over February and March dates for the 2000 and 2005 moose population surveys appears again on page 11 and should be clarified (see comments on page 4).

The moose population estimates of 5,151 and 4,673 for 2000 and 2005, respectively, are cited but these are not corrected for sightability. Applying the sightability correction factor of 1.4 (see comments on page 9, above) indicates populations of 7,211 (2000) and 6,542 (2005) moose which may be much closer to the true number that occurred during those years. Also, it should be noted that these estimates only apply to about 63% of the total land area in Unit 21E. Extrapolating the corrected estimates to the entire area yields 11,538 moose in 2000 and 10,467 moose in 2005. Since the IM population objective (9,000-11,000) applies to the entire unit, the extrapolated estimates are much more of a valid, meaningful comparison than referring to the uncorrected, rounded estimates (5,000 and 4,500) that apply only to a much smaller area. This analysis indicates that the IM population objective (9,000-11,000) may have been met contrary to the assertion in the plan that it was not.

In summary, citing uncorrected moose population estimates that apply to only part of Unit 21E overstates the problem and may falsely assert that the IM moose population objective has not been met. This is a serious deficiency in the plan that should be corrected.

It is claimed on page 11 that the Unit 21E moose population is “depleted” because the population and harvest are below IM objectives. Depletion of a big game population or reduction of its productivity (that may result in a significant reduction of allowable harvest) is specifically mentioned in the IM statute and requires a necessary finding by the Game Board prior to adoption of IM programs, including predator control. Indeed, this is one of the few restraints or standards the Board must follow in authorizing predator control. We suggest that it is insufficient to define “depleted” as failing to meet IM objectives. The intent of the statute was to require biological assessments of populations and their productivity. Game Boards predisposed to adopting predator control could set objectives arbitrarily high such that moose populations are always “depleted” if the test is whether or not objectives are met. Perpetual predator control, needed or not, would be the end result, and moose populations at high density in need of reduction by natural predators might continue to increase and ultimately crash while still considered to be “depleted.”

We strongly recommend that in this and other similar plans the Department should adopt a definition of depleted that involves biological assessments, not the artificial test of whether or not they meet IM objectives.

**Page 12.** Although it is recognized on page 12 that unreported harvest of moose occurs in Unit 21E and subsistence household surveys indicate higher harvests than those estimated by harvest ticket returns, there is no attempt to quantify illegal harvest. We suspect that household surveys fail to account for illegal harvest as respondents risk prosecution if they admit to crimes.

It is widely known that illegal moose kills occur often in Interior Alaska but reliable data on the extent of such activity is scarce. The only attempt to estimate the extent of unreported and illegal harvest occurred at McGrath.

A 2003 lawsuit challenging the McGrath predator control program revealed problems related to accurately estimating moose harvests (and thus determining whether or not intensive management objectives were met—one of the triggers for a control program). One problem was the magnitude of the unreported legal harvest. The planning team found that prior to 2001, for every 50 moose reported another 40-50 were probably taken legally but not reported. A second problem is the illegal (obviously unreported) harvest. ADFG data from McGrath based on radioed animals indicated that 35 of 98 moose were killed legally by hunters and 12 were taken illegally. This indicates a ratio of about one illegally taken moose for every three legally taken. Thus, this information indicates that unreported legally taken moose may be as high as 100% of the reported harvest and illegally taken moose add an additional 30%.

We do not suggest that these findings can be directly extrapolated to Unit 21E (just as we question the extrapolation of other findings at McGrath to Unit 21E). But it is important to note that unreported and illegal harvests should be estimated to ensure that the true harvest is not underestimated thereby magnifying the extent of the problem.

**Page 14.** As noted in our comments on page 7 of this plan, there have been no wolf or bear surveys in Unit 21E to estimate numbers, but numbers are provided in Table 2 based on density extrapolations from data obtained elsewhere. We caution that this is scientifically questionable and may lead to false assumptions regarding the true population size of these predator species. The danger here is that the extent of predation on moose may be grossly overestimated if the actual densities of predators are much lower than assumed.

Based on extrapolated wolf densities (resulting in a mean estimate of 210 wolves) combined with a moose population estimate of 8,000 for the entire unit, a moose:wolf ratio of 38:1 is given. If this represents the true ratio (and it may not if the extrapolation is faulty), we note that this is above the threshold ratio of 30:1 where research has shown wolf predation may limit growth of moose numbers.

**Page 17.** Page 17 indicates that moose browse availability and use was monitored at 32 sites in Unit 21E in 2006. These sites were located primarily in flood plain habitats used by moose mainly during winter. We note that only 32 sites in an area of about 8,000 square miles (or even in the 5,000 square miles censused for moose) are unlikely to reveal much about browsing intensity by the entire moose population or the ability of the habitat to support more moose. These topics would likely require hundreds of sites distributed over thousands of square miles.

We also note that recent field studies comparing moose browse in Unit 13 (where wolves are controlled) with that in Denali National Park (where wolves are protected) revealed that summer browse quality may be more important for moose than winter browse and summer forage where moose were controlled was deficient due to heavy browsing and negative effects on plants.

**Page 19.** It is stated that another browse survey may be done in Unit 21E if moose twinning rates decline. We strongly encourage the Department to conduct additional studies to assess habitat quality. The available data simply are insufficient to conclude that habitat is not limiting moose.

Page 20. The optimistic assessment on page 20 that if moose increase following wolf control, adequate numbers of moose could be harvested by combined fall and winter hunts, runs counter to experience in Unit 20A. There, despite proximity to thousands of hunters, it has proven difficult to harvest enough moose to prevent habitat degradation. In remote area like Unit 21E, fewer hunters concentrate mainly along rivers and distant moose are lightly harvested. It is unlikely that hunters will be able to stabilize moose at levels necessary to prevent habitat damage leading to a moose population crash.

**Page 22.** It is stated here (and again on page 26) that virtually all of the potential methods of bear reduction (necessary if bear predation is found to be limiting moose) are ineffective in Unit 21. These include live capture and translocation as conducted at McGrath in 2003 and 2004. This underscores the need to obtain basic information on bear population size and bear predation on moose prior to adopting a wolf control program. If bear predation is more important than wolf predation and if bears cannot be reduced, controversial wolf control may not be warranted.

**Page 23.** Page 23 mentions that the Department recommends periodic issuing of aerial shooting permits after the first phase of wolf control followed by an increase of moose. We regard this as biologically unnecessary based on experience in Unit 20A where moose remained at high density absent wolf control for many years. We also regard this shift in policy toward perpetual wolf control to maintain moose at high densities as departing from the intent of the Intensive Management Law that was designed only to restore depleted ungulate populations.

**Page 25-26, 28 and Appendix A.** The adaptive management plan for Unit 21E proposes new methods of triggering and ending wolf control programs. Rather than deciding to proceed after moose population surveys detect a population decline (in this case fewer than 4,500 moose), critical values are calculated based on statistical tests and these will trigger control. A similar approach would be used to terminate control programs. Specifically, a critical value of 5,648 moose is proposed, given certain levels of survey precision, for the March 2009 moose survey. A control program would begin if survey results indicated fewer than this number of moose.

Using this approach raises the control trigger threshold level of moose numbers considerably—from 4,500 to 5,648, a 26% increase. It substantially increases the likelihood that a control program will begin following the March 2009 survey.

Similarly, this approach would extend control well beyond the point it would cease if the ending trigger was 5,000 moose. The calculated critical value for ending control is 6,275 moose, 26% higher than 5,000.

The net result of this new approach is to lower the bar for initiating control programs and raise the bar for terminating them. We regard this as “cheating” and strongly recommend that the standard triggers apply, i.e., if the March 2009 moose survey indicates a population estimate significantly less than 4,500 animals, then and only then would control proceed and then only if our other concerns are addressed. Similarly, if initiated, control would end when surveys indicate a significantly greater estimate than 5,000 moose.

**Page 26.** Page 26 indicates that wolves will not be reduced in 67% of Unit 21E, but page 24 indicates 60%. This discrepancy should be clarified. Again, we note that there are no previous wolf surveys to provide data on wolf numbers or distribution, so the claim that 20% of the unit’s wolves will be spared is specious.

**Page 27.** This plan recommends that the Board should approve Proposal 239 at the March Board meeting, a proposal that if adopted would authorize wolf control in Unit 21E. We suggest that the existing information is insufficient to adopt the proposal and, at a minimum, the Board should table the proposal until the results of the 2009 moose and wolf surveys are available.



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**Proposal 22**

**We support this proposal and urge the Board to adopt it.**

This proposal would repeal the lynx trapping season in Chugach State Park.

Chugach State Park is adjacent to Anchorage, Alaska's largest urban center. It attracts thousands of visitors annually who hike, ski, backpack, mountain bike and view wildlife and scenery. Virtually all of these park users eagerly seek wildlife within the park to enhance their outdoor experiences. Along with moose, Dall's sheep, eagles and a host of smaller mammals and birds, there are several rare, charismatic species that are highly sought for viewing. These include lynx.

Lynx populations rise and fall along with snowshoe hares that fluctuate in 10-year cycles. During many years lynx are rare in the park adding to their status as important watchable wildlife. In the absence of reliable population estimates the Board should manage the lynx population conservatively. Trapping of lynx, especially during low periods in their cycle, may reduce numbers to unacceptably low numbers including the potential of harvesting more animals than the lynx can sustain. Lynx populations in all other states of the union have demonstrated a strong susceptibility to human harvest. In addition, with the strong biological need for reducing wolverine harvest in the park, the risk of incidental wolverine bycatch is unacceptable. Regulations allowing one large mammal to be harvested and not another is impractical and does not lend itself to prudent management of the resource based on scientific parameters.

We urge the Board to recognize the value of prioritizing lynx for viewing within the park for the benefit of thousands of people as opposed to benefiting only a very small number of trappers and risking overharvest of the wolverine population due to bycatch. Closing the lynx trapping season within the park will enable park managers to provide for increased wildlife viewing, one of the purposes established by the state legislature when it created the park.

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**Proposal 35. We *oppose* this proposal and urge the Board to not adopt it.**

This would extend the brown bear hunting season in Units 6A, B, and C from May 31 to June 10, with the stated purpose of controlling predation for the benefit of dusky Canada geese and moose.

We believe that a regulatory change solely to control brown bears as predators should, if justified by adequate data, only be made after first establishing a brown bear control area such as was established in GMU 19D (EMMA) and 20E.

The designation of a formal predation control area would follow responsible management guidelines, set program objectives and harvest goals as well as impose conditions and other limitations appropriate and specific to the nature of the area. It would also require annual reports to the BOG from ADF&G on whether the program was meeting its objectives. These procedures were established to responsibly manage predators and prey, facilitate program peer review and better inform the public as to the nature and progress such controversial programs.

An additional concern about this proposal is that late spring/early summer bears are more likely to have poor hide quality due to rubbing. This diminishes the trophy quality of the animal and contributes to the waste of a valuable resource.

A final concern is that it is well known that brown bear predation is highly variable from animal to animal. Reducing bears overall is an inefficient way to get at individual animals that have developed the skill and habit of targeting newborn prey species. Relocation of specific problem bears is a better alternative than increasing the take by lengthening hunting seasons.

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**Proposal 29. We *support* this proposal and urge the Board to amend and adopt it.**

The intent of this proposal, to have a wounded but not recovered animal count against the bag limit, is a concept long part of regulations governing hunting of trophy species in Africa and a strong component of the North American Model of Game Management's ethical standards. We find it to be a valuable addition to the hunting regulations in Alaska to enhance hunting ethics, and suggest that it be applied to all big game species statewide.

There is also precedent in existing BOG regulations. In Units 1-5, and in Unit 8, bears wounded by a hunter count as the bag limit for the regulatory year.

Wounded means there is sign of blood or other sign that the bear has been hit by a hunting projectile.

It is important to count wounded bears in the harvest statistics because bears that are never counted in the harvest statistics that later die result in misleading annual harvest data that could jeopardize sustained yield of the resource.

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We believe that a regulatory change solely to control brown bears as predators should, if justified by adequate data, only be made after first establishing a brown bear control area such as was established in GMU 19D (EMMA) and 20E.

The designation of a formal predation control area would follow responsible management guidelines, set program objectives and harvest goals as well as impose conditions and other limitations appropriate and specific to the nature of the area. It would also require annual reports to the BOG from ADF&G on whether the program was meeting its objectives. These procedures were established to responsibly manage predators and prey, facilitate program peer review and better inform the public as to the nature and progress such controversial programs.

An additional concern about this proposal is that late spring/early summer bears are more likely to have poor hide quality due to rubbing. This diminishes the trophy quality of the animal and contributes to the waste of a valuable resource.

A final concern is that it is well known that brown bear predation is highly variable from animal to animal. Reducing bears overall is an inefficient way to get at individual animals that have developed the skill and habit of targeting newborn prey species. Relocation of specific problem bears is a better alternative than increasing the take by lengthening hunting seasons.

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**Proposal 43. We *support* this proposal and urge the Board to adopt it.**

This proposal would close the brown bear hunting season in portions of Unit 9C.

During the past 20 years demand for brown bear viewing in Alaska has grown exponentially. Alaska offers world-class viewing opportunities for bears but there are a very limited number of sites specifically designated for bear viewing. These include McNeil River Falls where a permit program allows a limited number of participants to experience bears fishing for salmon. After leaving the falls in autumn, some of the McNeil bears are known to travel in the geographic area covered by proposal 43 and are subject to hunting. Because of the worldwide importance McNeil and the unique opportunity it offers, it is vital to protect the bears that become habituated to close encounters with humans and are very vulnerable to hunters as a result.

We urge the Board to recognize the value of preserving bears for viewing and to close areas used by McNeil bears when they are subject to hunting, thereby benefiting thousands of nonconsumptive users and supports one of the state's largest industries, the tourism industry, at the expense of only a few hunters. The non-consumptive use of this bear population greatly outweighs the very small consumptive use currently occurring.

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**Proposal 44. We *support* this proposal and urge the Board to adopt it.**

This proposal would establish a drawing permit for brown bear hunting in portions of Unit 9C, Katmai National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for bear hunting on Katmai National Preserve lands.

Proposal 44 details the problem: the NPS mandate to provide for high concentrations of bears has been compromised by recent increases in brown bear harvests as a result of more liberal seasons, in particular in the fall when bears are concentrated on easily accessible salmon spawning streams. Managing harvests more conservatively through a drawing permit is a possible solution to addressing the needs of both the NPS and the other user groups that rely on this resource. In addition, there is a very strong need for additional field studies. We urge the Board to take these steps and thereby demonstrate willingness to work cooperatively with NPS as indicated in the State of Alaska's memorandum of understanding regarding management goals on federal lands.

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**Proposal 45.**

**We *support* the intent of this proposal and urge the Board to restrict the harvest of Brown Bears on Katmai National Preserve lands.**

This proposal would shorten the brown bear hunting season in portions of Unit 9C, Katmai National Preserve.

The intent of this proposal is similar to Proposal 44 -- to adjust the harvest of Brown Bears on Katmai National Preserve lands so as to allow NPS to fulfill its mandate of providing for high concentrations of bears. This mandate has been compromised by recent increases in brown bear harvests as a result of more liberal seasons, in particular in the fall when bears are concentrated on easily accessible salmon spawning streams. Managing harvests more conservatively by limiting the season to every other year address's the needs of both the NPS and the other user groups, including the hunter, that rely on this resource. Reducing the harvest will aid in the trophy status management objective for brown bears as well by allowing bears to reach the maximum age.

We urge the Board to take these steps and thereby demonstrate willingness to work cooperatively with NPS as indicated in the State of Alaska's MOU regarding management goals on federal lands.

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**Proposal 49. We oppose this proposal and urge the Board to not adopt it.**

Proposal 49 if adopted would create a predator control program aimed at reducing brown bears to increase moose for hunters in Unit 17B.

As with many proposals generated by local Fish and Game Advisory Committees, this proposal contains only anecdotal claims that bear numbers have increased and there is heavy bear predation on moose resulting in fewer moose for hunters. This is then used to request a control program to reduce bears with the expectation that more moose will be available to hunters.

We suggest that any new bear control programs must be based on field studies that validly demonstrate bear predation is limiting moose population growth rather than other factors including heavy hunting, poor habitat, wolf predation or severe winters. Anecdotal information is insufficient to trigger control programs as was demonstrated in McGrath in 2000 and 2001.

There, moose were estimated at 850 animals in 2000, down from several thousand two decades earlier. Locals termed it a crisis and demanded a wolf control program. A population of 3000-3500 moose was deemed necessary to sustain a harvest of 135-150 required for local subsistence needs. However, a moose census in 2001 revealed a moose population of about 3600, more than necessary to provide enough harvested animals per year for local residents. The 2000 moose population estimate (850) was based on poor data obtained during marginal census conditions that resulted in a drastic underestimate of true population size. This is an example of local reliance on anecdotal or poor information that may be used to justify unnecessary predator control programs.

We should not repeat the mistakes made at McGrath when considering the problems in Unit 17B. There is no substitute or shortcut for valid field studies prior to creating a predator control program so that limiting factors are identified and ranked in order of importance. Predation is not a universal limiting factor for moose populations across Alaska.

The board of game has stated that any predator control program will be based on scientific data. This proposal provides no scientific justification regarding its claims nor its proposed outcome.

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**Proposal 50. We oppose this proposal and urge the Board to not adopt it.**

Proposal 50 if adopted would create a predator control program aimed at reducing brown bears to increase moose for hunters in Units 17B and 17C.

As with many proposals generated by local Fish and Game Advisory Committees, this proposal contains only anecdotal claims that bear numbers have increased and there is heavy bear predation on moose resulting in fewer moose for hunters. This is then used to request a control program to reduce bears with the expectation that more moose will be available to hunters.

We suggest that any new bear control programs must be based on field studies that validly demonstrate bear predation is limiting moose population growth rather than other factors including heavy hunting, poor habitat, wolf predation or severe winters. Anecdotal information is insufficient to trigger control programs as was demonstrated in McGrath in 2000 and 2001.

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We should not repeat the mistakes made at McGrath when considering the problems in Units 17B and 17C. There is no substitute or shortcut for valid field studies prior to creating a predator control program so that limiting factors are identified and ranked in order of importance. Predation is not a universal limiting factor for moose populations across Alaska.

The board of game has stated that any predator control program will be based on scientific data. This proposal provides no scientific justification regarding its claims nor its proposed outcome.

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**Proposal 51. We *support* this proposal and urge the Board to adopt it.**

This proposal would shorten the brown bear hunting season and reduce the bag limit in Unit 17B, Lake Clark National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for bear hunting on Lake Clark National Preserve lands.

Proposal 51 details the problem for Lake Clark National Preserve: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce brown bears in order to increase moose. Bear hunting seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Recent increases in bear harvests conflict with the NPS objective of providing high concentrations of bears. Harvests should be reduced by shortening seasons and reducing bag limits. We urge the Board to take this step and thereby demonstrate willingness to enable NPS to fulfill its mission.

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**Proposal 64. We *support* this proposal and urge the Board to adopt it.**

This proposal would shorten the wolf hunting season and reduce the bag limit in portions of Unit 9.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for wolf hunting on Lake Clark, Katmai and Aniakchak National Preserve lands.

Proposal 64 details the problem for Lake Clark, Katmai, and Aniakchak National Preserves: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce wolves in order to increase caribou. Wolf seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more caribou for hunters. Harvests should be reduced by shortening seasons and reducing bag limits.

We urge the Board to take these steps and thereby demonstrate willingness to work cooperatively with NPS as indicated in the State of Alaska's MOU regarding management goals on federal lands.

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**Proposal 67. We *support* this proposal and urge the Board to adopt it.**

This proposal would reduce the bag limit for wolves in portions of Unit 17, Lake Clark National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for wolf hunting on Lake Clark National Preserve lands.

Proposal 67 details the problem for Lake Clark National Preserve: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce wolves in order to increase moose. Wolf seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Harvests should be reduced by shortening seasons and reducing bag limits.

We urge the Board to take these steps and thereby demonstrate willingness to work cooperatively with NPS as indicated in the State of Alaska's MOU regarding management goals on federal lands.

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**Proposal 68. We oppose this proposal and urge the Board to not adopt it.**

Proposal 68 if adopted would create a predator control program aimed at reducing wolves to increase moose for hunters in Units 17B and 17C.

As with many proposals generated by local Fish and Game Advisory Committees, this proposal contains only anecdotal claims that wolf numbers have increased and there is heavy wolf predation on moose resulting in fewer moose for hunters. This is then used to request a control program to reduce wolves with the expectation that more moose will be available to hunters.

We suggest that any new wolf control programs must be based on field studies that validly demonstrate wolf predation is limiting moose population growth rather than other factors including heavy hunting, poor habitat, bear predation or severe winters. Anecdotal information is insufficient to trigger control programs as was demonstrated in McGrath in 2000 and 2001.

In Unit 19D(East), moose were estimated at 850 animals in 2000, down from several thousand two decades earlier. Locals termed it a crisis and demanded a wolf control program. A population of 3000-3500 moose was deemed necessary to sustain a harvest of 135-150 required for local subsistence needs. However, a moose census in 2001 revealed a moose population of about 3600, more than necessary to provide enough harvested animals per year for local residents. The 2000 moose population estimate (850) was based on poor data obtained during marginal census conditions that resulted in a drastic underestimate of true population size. This is an example of local reliance on anecdotal or poor information that may be used to justify unnecessary predator control programs.

We should not repeat the mistakes made at McGrath when considering the problems in Units 17B and 17C. There is no substitute or shortcut for valid field studies prior to creating a predator control program so that limiting factors are identified and ranked in order of importance. Predation is not a universal limiting factor for moose populations across Alaska.

The board of game has stated that any predator control program will be based on scientific data. This proposal provides no scientific justification regarding its claims nor its proposed outcome.

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**Proposal 69. We oppose this proposal and urge the Board to not adopt it.**

Proposal 69 if adopted would create a predator control program aimed at reducing predators to increase moose and caribou for hunters in Units 9 and 17.

As with many proposals generated by local Fish and Game Advisory Committees, this proposal contains only anecdotal claims that predator numbers have increased and there is heavy predation on moose and caribou resulting in fewer ungulates for hunters. This is then used to request a control program to reduce predators with the expectation that more moose will be available to hunters.

We suggest that any new predator control programs must be based on field studies that validly demonstrate predation is limiting moose population growth rather than other factors including heavy hunting, poor habitat, or severe winters. Anecdotal information is insufficient to trigger control programs as was demonstrated in McGrath in 2000 and 2001.

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We should not repeat the mistakes made at McGrath when considering the problems in Units 9 and 17. There is no substitute or shortcut for valid field studies prior to creating a predator control program so that limiting factors are identified and ranked in order of importance. Predation is not a universal limiting factor for moose populations across Alaska.

The board of game has stated that any predator control program will be based on scientific data. This proposal provides no scientific justification regarding its claims nor its proposed outcome.

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**Proposal 75. We *oppose* this proposal and urge the Board to not adopt it.**

Proposal 75 if adopted would allow brown bears in Unit 13 to be taken over bait stations as part of the predator control program to reduce predators and increase moose for hunters.

There are many valid reasons for continuing the long-standing prohibition on baiting brown bears including the fact that baiting (feeding) bears habituates them to humans and may lead to more bears injuring or killing people, and to increased property damage.

There is no valid evidence indicating that allowing baiting will ultimately result in more moose for hunters. Indeed, hunters that normally stalk bears will likely substitute baiting for stalking with no increase in total hunting pressure or number of hunters and no increase in bears harvested. Despite vastly liberalized brown bear regulations over the past 20 years, bear numbers in Unit 13 have not declined, nor have more moose been taken by hunters. There is no reason to believe that further liberalization in the form of legalized baiting will work. This proposal lacks any scientific justification.

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**Proposal 76. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal would increase the brown bear bag limit in Unit 13E.

There is no recent biological information indicating excessively heavy predation on moose, caribou and sheep in Unit 13E, nor is there any reason to believe that increasing the bag limit to 2 bears per year will result in more ungulates for hunters. Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain huntable numbers of ungulates. Seasons and bag limits on brown bears have been excessively liberalized in many areas. GMU 13 is the best example available where liberal seasons and bag limits on grizzly bears failed to improve moose calf survival and indeed failed to reduce bear numbers. There is no justification whatever to further liberalize the regulations.

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**Proposal 77. We *support* this proposal and urge the Board to adopt it.**

This proposal would shorten the brown bear hunting season and reduce the bag limit in Unit 13C, Wrangell St. Elias National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for bear hunting on Wrangell St. Elias National Preserve lands.

Proposal 77 details the problem for Wrangell St. Elias National Preserve: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce brown bears in order to increase moose. Bear hunting seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Recent increases in bear harvests conflict with the NPS objective of providing high concentrations of bears. Harvests should be reduced by shortening seasons and reducing bag limits. We urge the Board to take this step and thereby demonstrate willingness to enable NPS to fulfill its mission.

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**Proposal 78. We *support* this proposal and urge the Board to adopt it.**

This proposal would create a registration permit hunt for brown bears in Unit 11Z, Wrangell St. Elias National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for bear hunting on Wrangell St. Elias National Preserve lands.

Proposal 78 details the problem for Wrangell St. Elias National Preserve: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce brown bears in order to increase moose. Bear hunting seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Recent increases in bear harvests conflict with the NPS objective of providing high concentrations of bears. Harvests should be reduced by shortening seasons and reducing bag limits. We urge the Board to take this step and thereby demonstrate willingness to enable NPS to fulfill its mission.

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**Proposal 112. We *support* this proposal and urge the Board to adopt it.**

This proposal would reduce the bag limit for wolves in portions of Unit 13C, Wrangell St. Elias National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for wolf hunting on Wrangell St. Elias National Preserve lands.

Proposal 112 details the problem for Wrangell St. Elias National Preserve: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce wolves in order to increase moose. Wolf seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Harvests should be reduced by shortening seasons and reducing bag limits. We urge the Board to take this step and thereby demonstrate willingness to enable NPS to fulfill its mission.

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**Proposal 113. We *support* this proposal and urge the Board to adopt it.**

This proposal if adopted would create an experimental control area in Unit 13A as part of the predator control program in Unit 13.

Proposal 113 highlights an important deficiency in the predator control programs approved by the Board starting in 2003, namely the failure to follow recommended protocols for designing control programs as experiments as recommended by the 1997 National Research Council Review of predator control in Alaska. Absent such protocols, we cannot determine the success or failure of predator control in increasing ungulate harvests by hunters.

Accordingly, for Unit 13 after 6 years of wolf control, we are unable to determine whether or not the program is working despite premature claims of success by ADF&G. This is largely because no experimental control area(s) was established, i.e., no area(s) was free of wolf control and monitored to assess moose population trends there compared to areas where wolves were reduced. If moose increased in Unit 13 following wolf control it is not valid to claim that such increases were due to reducing wolves as several other factors may have accounted for the increase including mild winters, improved habitat, less bear predation or reduced harvests. An experimental control area(s) where moose did not increase would provide the only valid proof that control worked.

As proposal 113 indicates, it is not too late to modify the Predator Control Implementation Plan to establish an experimental control area in Unit 13A where wolf control would cease. We urge the Board to take this important step so that an NRC warning would be heeded—most predator control programs have uncertain outcomes due to inadequate monitoring and evaluation protocols. Failure to adopt Proposal 113 would lead to the unfortunate result of never being able to say with confidence that predator control did or did not work.

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**Proposal 114. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal if adopted would change the boundary of the predator control program in Unit 13E.

This proposal, as so many like it, lacks any scientific data to back up its assumptions. There are no ADF&G reports to indicate that excessive wolf predation on moose calves occur along the west boundary of 13E. Nor, does the individual cite any reference to moose population estimates that indicate predator control is even necessary in this area.

When the predator control program was expanded to include most of Unit 13E the Board carefully considered where the boundaries should be placed. We think it unwise to now change the boundary and expand the area after the program has been in effect for several years. We urge the Board to retain the present boundary.

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**Proposal 125. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal would create a predator control program in Units 7 and 15 and allow the sale of black bear hides and skulls.

There is no recent biological information indicating excessively heavy black bear predation on moose in Units 7 and 15, nor is there any reason to believe that allowing the sale of hides and skulls will result in more moose for hunters. Indeed there is little to indicate that the sale of black bear hides would do anything but promote illegal harvest of bears for profit. The Alaska State Wildlife Troopers have long opposed the sale of bear parts and have consistently testified that request it, particularly when the harvest in the adjacent GMU or regional GMU's do not allow selling of bear parts. The current regulatory structure and funding allocation for enforcement does not provide the regulatory tools required to effectively manage the sale of bear parts for profit.

Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain high harvest rates for ungulates. Seasons and bag limits on black bears have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result. Indeed, in Unit 16 the data clearly shows that allowing the sale of black bear hides was not effective at increasing black bear harvest.

Until field studies confirm that black bear predation is limiting moose on the Kenai Peninsula, the Board should not attempt to further reduce bear numbers

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**Proposal 126. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal would increase the bag limit for black bears in Units 7 and 15 to 3 bears per year.

There is no recent biological information indicating excessively heavy black bear predation on moose in Units 7 and 15, nor is there any reason to believe that a bag limit of 3 will result in more moose for hunters. In addition, there is no indication that the black bear population is excessively high or is even increasing at all.

Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain high harvest rates for ungulates. Seasons and bag limits on black bears have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result.

Until field studies confirm that black bear predation is limiting moose on the Kenai Peninsula, the Board should not attempt to further reduce bear numbers.

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**Proposal 128. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal would allow the sale of black bear hides in GMU 15.

To allow the sale of bear hides in some units but not in others, especially adjacent units, creates serious enforceability problems. Indeed there is little to indicate that the sale of black bear hides would do anything but promote illegal harvest of bears for profit. It fosters misreporting GMU kill locations in order to be able to sell the hide.

The Alaska State Wildlife Troopers have long opposed the sale of bear parts and have consistently testified against any proposals that request it. The current regulatory structure and funding allocation for enforcement does not provide the regulatory tools required to effectively manage the sale of bear parts for profit.

Commercialization of bear hides establishes a precedent which many believe leads to pressure and openings for the sale of other lucrative but illicit parts such as gall bladders on black markets worldwide.

This liberalization is also based on bears as predators of moose calves, but there is no evidence presented that the sale of hides in other areas has alleviated moose calf predation which tends to be dependent on the habits of a limited number of specific bears

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**Proposal 130. We *oppose* this proposal and urge the Board to not adopt it.**

This would substitute a general brown bear hunt for a permit only hunt in GMU 7.

The present conservative permit system with a quota based on total mortality (including DLP which alone has exceeded the sustainable mortality estimates for many years now) recognizes the sensitivity of the Kenai Peninsula brown bear population to over harvest. Without the longstanding controls and safeguards of a permit system, too many bears could be harvested in a short time before ADF&G could close the season by emergency order. The interagency study team (IBBST) objectives---harvests not to exceed 20 bears annually, averaged over 3 years, with a limit of 8 females) recognize that Kenai Brown bears are a “Species of Special Concern,” requiring strict controls to assure conservation through sustained yield. With a very limited geographical range, and increasing threats from human encroachment and habitat alteration, the population continues to be threatened, especially with ADF&G population estimates being not based on any bear census studies, as stated in S and I Brown Bear Management Reports (see July 2004-June 2006).

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**Proposal 131. We *oppose* this proposal and urge the Board to not adopt it.**

This would create a brown Bear archery hunt in GMU 7 to reduce problem bears

DLP bear kills have remained high in GMU 7. From 1999 to 2006, from 13 to a high of 29 bears were taken by DLP. ( Season closures have occurred over the last 4 years). However, increasing the hunting effort would not effectively address the problem. Most human bear conflicts occur around popular fishing spots, recreational trails, or attractive garbage and nuisance sites---a limited area of GMU 7 geographically. Many of the recent DLPs were in association with chicken coops. The proposal makes no effort to restrict the archery hunt to these areas, Nor is there research or other evidence to suggest that bears taken by archers would likely reduce DLP kills. It will likely be an additive kill which would jeopardize the threatened bear population further. The interagency Brown bear study team should be revitalized and more aggressively pursue solutions to non-hunting caused mortality of Kenai bears. Though partly an educational process, this will require increasing cooperation from the public and local governments (waste management control) in order to better protect this resource.

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**Proposal 132. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal would create a predator control program and issue 50-100 hunting permits annually for brown bears during spring and fall seasons in Units 7 and 15.

Kenai Peninsula brown bears are a species of special concern. Bears are managed according to specific provisions in a management plan designed to preserve a viable bear population by limiting the total annual loss of bears from all sources of human-caused mortality. This proposal, if adopted, would derail that plan. DLPs have consistently exceeded the estimated maximum sustainable mortality rate in recent years indicating the population may be in trouble. In situations where there are no reliable census estimates on bear populations a conservative approach to harvest rates should be considered.

There is no recent biological information indicating that heavy brown bear predation is limiting Kenai Peninsula moose. In fact, past studies have shown black bears to be a more significant predator on neonate moose than brown bears. Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain huntable numbers of ungulates. Seasons and bag limits on brown bears have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result. Until field studies confirm that brown bear predation is limiting moose on the Kenai Peninsula, the Board should not attempt to further reduce bear numbers.

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**Proposal 133. We *oppose* this proposal and urge the Board to not adopt it.**

This would liberalize brown bear hunting in GMU's 7 and 15 by providing for a harvest of 20 reproductive females (not to be counted in the quota of 20) as a moose predation control measure.

There is no data on brown bear population estimates to indicate the brown bear population has increased to a level that would warrant such a dramatic and aggressive reduction program that targets female brown bears. The CPAC provided no scientific data to justify its claim that the brown bear population is too high. They base their claim on speculation alone.

In addition, the AC claims that moose predation is occurring at unacceptable levels. Again, pure speculation backed up by no reference to biological data or ADF&G support.

As before, we believe that bear predation control, if justified by adequate scientific data, must not be conducted without first establishing a formal bear predation control area. This follows past precedent in order to set measurable goals and objectives as part of the responsible management of a sensitive resource. Kenai brown bears retain the status of a "species of Special Concern," requiring very conservative management.

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**Proposal 135. We *oppose* this proposal and urge the Board to not adopt it.**

This would allow a harvest of brown bear on the Kenai (GMU's 7 and 15) regardless of DLP mortality

To responsibly conserve brown bears on the Kenai in light of their special status of concern, all mortality should be considered when arriving at a permissible harvest quota for each calendar year. According to the Brown Bear Management Report of 2005-2006 authored by J. Selinger, “there has never been a formal census conducted to produce a statistically valid estimate for the Kenai brown bear population.” Without an accurate census, all mortality is critical in determining a proper threshold for an allowable hunt. In 2006, 29 DLP bears were taken, far exceeding the number that is permissible before a hunting season can be established. To not count this figure would clearly violate sustained yield principles, since a threshold of 14-21 bears maximum has been established (7 percent of the population).

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**Proposal 136. We *oppose* this proposal and urge the Board to not adopt it.**

This would eliminate brown bears as a species of special concern, extend the hunting season and establish 50 drawing permits.

We believe this proposal by a state Advisory Committee demonstrates an incredible disregard for established principles of sustained yield management found in Title VIII of Alaska's state Constitution.

There is no justification for liberalization of hunting seasons for brown bear on the Kenai. The Anchorage AC bases its request largely on anecdotal information of which they provide nothing but their "perceived" conclusions. Basing population growth on the rate of DLP's per year carries little to no scientific credibility and provides no indication of relative brown bear populations, especially when trail improvements, park improvements, new housing projects all are contributing to increased access into brown bear habitat and migration corridors is occurring each year.

A responsible interagency team of professionals has determined that a low threshold of permissible mortality is appropriate for Kenai bears. ADF&G took this action because it found the population "is vulnerable to a significant decline due to low numbers, restricted distribution, dependence on limited habitat resources, or sensitivity to environmental disturbance." (Kenai Peninsula Brown Bear Strategy, June 2000). The latest estimated trend establishes the population as stable or in places slowly increasing. In light of the population's sensitivity and ADF&G's lack of population census data, we believe that no change is justified in the hunting regulations. The proposal offers hunting as a suggested substitute for DLP kills but this fails to acknowledge that DLP usually adds to overall mortality instead of substituting for it.

As for the role of the BOG in Kenai brown bear management, the BOG is not bound by the interagency team recommendations. As with other management plans, these are just "documents frequently used as references for developing management strategies." ( P.67, Brown bear Management Report, 2006). The GMU 4 Brown bear Management Plan is another example of a document the BOG used to modify existing regulations, after using a diverse stakeholder approach.

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**Proposal 153. We *oppose* this proposal and urge the Board to not adopt it.**

Proposal 153 would establish a predator control program on the Kenai Peninsula aimed at reducing wolves and increasing moose and sheep for hunters.

There is no recent biological information indicating excessively heavy wolf predation on moose in Units 7 and 15, nor is there any reason to believe that reducing wolves will result in more moose and sheep for hunters. The proposal cites no calf mortality studies in Units 7 or 15 that indicate excessive predation by wolves on moose or sheep in these GMUs.

Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain huntable numbers of ungulates. Seasons and bag limits on wolves have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result. Until field studies confirm that wolf predation is limiting moose on the Kenai Peninsula, the Board should not attempt to further reduce wolf numbers.

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**Proposal 154. We *oppose* this proposal and urge the Board to not adopt it.**

Proposal 154 would establish a predator control program in Units 15A and 15C aimed at reducing wolves and bears and increasing moose for hunters.

There is no recent biological information indicating excessively heavy predation on moose in Units 15A and 15C, nor is there any reason to believe that reducing predators will result in more moose for hunters. Once again, there are no calf mortality studies to support these assumptions. Predator control has never been shown scientifically to be capable of maintaining a “proper biological balance” that “results in a healthy, sustainable population of moose, brown bears and wolves.” Gambling our wildlife resources on non-scientific propaganda policy protocols is not the mandate of the board of game, nor in the best interests of the residents of Alaska.

Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain huntable numbers of ungulates. Seasons and bag limits on predators have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result. Until field studies confirm that predation is limiting moose on the Kenai Peninsula, the Board should not attempt to further reduce predator numbers.

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**Proposal 166. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal would modify the predator control program in Unit 16B to allow baiting of brown and black bears all summer and allow the use of snares to take black bears. The goal, as stated, is to increase the harvest of black bear sows and cubs.

The Unit 16 Predator Control Implementation Plan's aggressive means of harvest for sows and cubs is not effective and needs to be removed, not further liberalized. Implementation of such drastic methods of harvest such as unlimited harvest combined with the legal sale of hides must be based on the most current peer-reviewed scientific standards and traditional harvest records indicating both the need and effectiveness of harvesting this segment of the black bear population.

In 2008, the first year for the black bear predator control program in Unit 16, the harvest of black bears increased by just 51 bears over the previous season. In the year prior to establishing an IM plan for black bears in Unit 16, the year 2007, a total of 414 black bears were harvested under the general hunting regulations. In 2008 the harvest of black bears is approximately 465 bears, an increase of only 51 bears. Only 8 of those black bears were cubs. We can assume, at minimum, 4 sows were also harvested to get those cubs. This amounts to an increase of 12 bears that were harvested under the most liberalized sow and cub black bear means and dates of harvest regulations ever allowed in a predator control program. Such a small overall harvest increase by targeting females and cubs, a little over 1% of the harvest objective, clearly does not justify such liberal, unscientifically justified, means of harvest. Certainly expanding this program to allow unlimited snaring of black bear sows and cubs during the summer months lacks any reasonable justification based on science.

Harvest data clearly indicates that the overall harvest of black bears in 2008 simply shifted from sport hunting to predator control harvesting. This fact clearly indicates that the liberal sport hunting regulations that were in place prior to the Intensive Management Plan for Unit 16 were just as effective at both attracting the maximum number of hunters and producing the maximum rate of harvest for this unit without the option of killing black bear sows and cubs. In addition, large male bears were still by far the dominate harvest component, indicating that the regulation allowing harvest of sows and cubs is not effective at attracting hunters or increasing overall harvest. Hunters participating in the predator control program overwhelmingly preferred to harvest trophy bears which are large male bears.

There is no valid evidence indicating that allowing baiting for bears will ultimately result in more moose for hunters. Indeed, hunters that normally stalk brown bears will likely substitute baiting for stalking with no increase in total hunting pressure or number of hunters and no increase in bears harvested.

In addition, the Board has never addressed nor discussed the negative impacts of killing black bear sows and cubs to vital industries that rely on our wildlife resources in Unit 16, in particular, the tourism industry, which is a substantial component of the economy in Unit 16. For example, there are many lodges in Unit 16, including along the Chuit River that offer bear viewing opportunities to residents and non-residents. The potential impacts to those businesses do not justify the continuation of a harvest method that is not conducive to achieving the goals of the program. Nor do they justify expanding the program to allow the

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snaring of bears during the high use summer months for a wide range of recreational user groups.

The entire Unit 16 predator control program is based on excessive, unrealistic predator harvests that are justified using predator population estimates that are based on anecdotal data with little scientific validity. Moose calf mortality studies are limited in both scope and breadth.

Predator prey relationships are poorly understood in Unit 16. Limited field data indicates that black bears are the largest source of moose calf mortality in this area. In addition, ongoing field data indicates only a small subpopulation of black bears seem to have “acquired” the habit of focusing on moose calves. Broad predator control programs that target large percentages of the “estimated” predator population over very large areas are ineffective as well as extremely risky.

To make matters even worse, the program is designed without any “control” areas. These are the most basic and essential components for any reasonable scientific evaluation of the success of the predator control program.

Removing large percentages of the region’s predators, especially keystone predators, will have significant impact on the entire ecosystem. Simply counting moose and estimating a possible trend base on a basic “survey” of the population does not support the success of the program scientifically. To date, not one published review of the predator control programs developed since 2004 have been created.

Snares for bears would be set during the non-winter months when bears are active. These are not the months when furbearer snares are set. Snares set for bears would likely catch many non-target species including moose. Should a sow black or brown bear be snared there would be potential significant risk to the public.

We doubt that significantly more bears would be taken by snaring if it was legal, and doubt that additional ungulates would be available to hunters as a result of adopting this proposal.

There are many valid reasons for continuing the long-standing prohibition on baiting brown bears including the fact that baiting (feeding) bears habituates them to humans and may lead to more bears injuring or killing people, and to increased property damage.

There is no valid evidence indicating that allowing baiting will ultimately result in more moose for hunters. Indeed, hunters that normally stalk brown bears will likely substitute baiting for stalking with no increase in total hunting pressure or number of hunters and no increase in bears harvested. There is no reason to believe that further liberalization in the form of legalized baiting will work.

Bear baiting during summer may result in bears injuring humans when they encounter bait stations with bears nearby. Hikers, berry pickers, boaters and fisherman using the country during summer are apt to encounter bait stations, many of which are unused by hunters except on weekends. Bait stations without a hunter present with sows and cubs nearby are especially hazardous. Brown bears are known to aggressively defend food sources and may attack humans as a result.

We suggest that bear baiting during the summer months is a dangerous practice and unwarranted. We urge the Board to not allow it.



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**Proposal 168. We oppose this proposal and urge the Board to not adopt it.**

Proposal 168 would amend the Unit 16 predator control program to expand the regulatory text to allow same-day airborne hunting and transport to black bear baiting stations to specifically say “including helicopters. In addition, the proposal would, for the first time, allow youth to participate in predator control programs, liberalize the predator control bait station regulations to allow anyone participating in the program to hunt anyone’s bait station and, for the first time, allow non resident participation in a predator control program.

**Youth participation:**

Participation in a one of the states predator control programs requires an individual to sign a legally binding document, a predator permit. The state has long asserted that this is not a hunting opportunity, to be enjoyed using fair chase principles. The states position is that predator programs are a “control” effort using “adult” citizens instead of biologists to kill large percentages of a predator population in any given area. Harvest of meat for consumption and quality of hides is not considered in predator control program as stated by the Board of Game. Youth, under the age of 16 years, cannot sign a legally binding document and cannot, by law, participate in any program that requires such an “agreement” between the individual and the state. The Board of Game’s policy concerning predator control has long stated that predator control programs do not promote hunting ethics or our hunting heritage, thus they are definitely not appropriate for a youth.

**Use of helicopters:**

As you know the Board of Game has already authorized the use of helicopters in Unit 16’s predator control program. An act that is so aggressive, unpopular with the citizens of Alaska, and unjustified that the ADF&G has actually been forced to use their nearly atrophied muscle for a little push back to the Board of Game’s strictly political mandates and non scientific management protocols that have occurred since the Murkowski administration fired the entire board and appointed his own “version” of representation for Alaskan’s on the Board of Game. The requested regulatory language change is not in response to a biological need, but a deplorable attempt to continue to force a political agenda on the ADF&G, regardless of their strong opposition. Since the Murkowski “readjustment” the Board of Game has considered the ADF&G its tool to manipulate and ignore at will. These proposals attempt to “mandate” the conditions of a predator control permit, further restricting the ADF&G’s ability to manage with the best available science with the flexibility to use adaptive, case by case, management strategies.

The ADF&G has refused to allow helicopter use in the conditions of a predator control permit, or should we say “contract”, regardless of the Board of Games authorization, and for good reason. The biological risk to the wildlife populations is so excessive and the enforcement challenges are so significant that it does not warrant their use. Helicopters allow unlimited access to any location in the region and to 100% of the wildlife resources. In addition, the permit would allow an individual to land and shoot black bears, encouraging the illegal chasing and harassing of black bears, especially the highly coveted “trophy” bears. Enforcement of regulations would be chronically undermined even further by requiring state wildlife troopers and the Big Game Commercial Services Board investigator to be forced to rely on the states limited supply of helicopters. Using helicopters to fly in people and equipment would promote illegal landing strip

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“improvements” for fixed wing aircraft in remote, previously inaccessible, regions as well, allowing even further degradations to the wilderness ecosystems.

Non-resident participation:

Once again, this is not a “hunting” opportunity for out of state sport or trophy hunters. Predator control programs are a “contract” between residents and the state of Alaska that does not address fair chase, hide or meat quality as stated by the Board of Game. Non resident participation occurred last year due to a close door, last minute decision by the ADF&G to change the long held policy, for the first time, to allow a general sport hunt to coincide with a predator control hunt. The general sport hunt allowed non resident participation under the state wide regulations for non resident baiting and other hunting methods for bears. These regulations have long been in place for non resident hunters. The proposal is simply yet another deplorable attempt by Aaron Bloomquist, the Chairman of the Anchorage AC, to promote his commercial hunting interests in Unit 16.

Extending the baiting season into the summer months:

Bear baiting during summer may result in bears injuring humans when they encounter bait stations with bears nearby. Hikers, berry pickers, boaters and fisherman using the country during summer are apt to encounter bait stations, many of which are unused by hunters except on weekends. Bait stations without a hunter present with sows and cubs nearby are especially hazardous. Brown bears are known to aggressively defend food sources and may attack humans who approach them.

We strongly urge the Board to reject all aspects of this proposal.



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**Proposal 170. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal would allow trapping and snaring of bears in Unit 16 under a predator control permit.

Although the first sentence refers to brown bears, much of the justification mentions black bears. It is unclear which species is intended. We assume both black and brown bears could be trapped and snared if the Board adopts this proposal.

Trapping and snaring of bears have long been prohibited in Alaska. There are many reasons to continue this ban. Steel leg-hold traps large enough to hold bears are a serious danger to humans and likely would be fatal to pets. All but one or two states recognized these dangers decades ago and prohibited trapping of bears.

Snares for bears would be set during the non-winter months when bears are active. These are not the months when furbearer snares are set. Snares set for bears would likely catch many non-target species including moose and caribou.

We doubt that significantly more bears would be taken by trapping and snaring if it was legal, and doubt that additional ungulates would be available to hunters as a result of adopting this proposal. The benefits would likely be small compared to the costs and risks to human safety.

Using traps or snares to kill brown or black bears raises serious ethical and humane issues. Catching and holding large powerful and potentially dangerous animals presents a situation where wounding loss and injury can occur, as demonstrated in Unit 4, brown bear tagging and capture programs using snaring along salmon streams as the capture method. Injured bears can escape, resulting in prolonged suffering. With regulations like this, public acceptance of hunting will be diminished, adversely impacting responsible hunters.

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**Proposal 171. We *oppose* this proposal and urge the Board to not support it.**

This proposal would allow trapping of black bears as part of the Unit 16B predator control program to reduce predators and increase moose for hunters.

Trapping and snaring of bears have long been prohibited in Alaska. There are many reasons to continue this ban. Steel leg-hold traps large enough to hold bears are a serious danger to humans and likely would be fatal to pets. All but one or two states recognized these dangers decades ago and prohibited trapping of bears.

We doubt that significantly more bears would be taken by trapping if it was legal, and doubt that additional ungulates would be available to hunters as a result of adopting this proposal. The benefits would likely be small compared to the costs and risks to human safety.

Using traps or snares to kill brown or black bears raises serious ethical and humane issues. Catching and holding large powerful and potentially dangerous animals presents a situation where wounding loss and injury can occur, as demonstrated in Unit 4, brown bear tagging and capture programs using snaring along salmon streams as the capture method. Injured bears can escape, resulting in prolonged suffering. Should a cub of any sow bear, either brown or black bear, become snared the potential for significant risk to the public is overwhelming. With regulations like this, public acceptance of hunting will be diminished, adversely impacting responsible hunters.

We urge the Board to not adopt this proposal

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**Proposal 174. We *support* this proposal and urge the Board to adopt it.**

This proposal would shorten the brown bear hunting season and reduce the bag limit in Unit 16B, Denali National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for bear hunting on Denali National Preserve lands.

Proposal 174 details the problem for Denali National Preserve: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce brown bears in order to increase moose. Bear hunting seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Recent increases in bear harvests conflict with the NPS objective of providing high concentrations of bears. Harvests should be reduced by shortening seasons and reducing bag limits.

We urge the Board to take these steps and thereby demonstrate willingness to work cooperatively with NPS as indicated in the State of Alaska's MOU regarding management goals on federal lands.

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**Proposal 186. We *support* this proposal and urge the Board to adopt it.**

This proposal would reduce the bag limit for wolves in portions of Unit 16B, Denali National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for wolf hunting on Denali National Preserve lands.

Proposal 186 details the problem for Denali National Preserve: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce wolves in order to increase moose. Wolf seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Harvests should be reduced by shortening seasons and reducing bag limits. We urge the Board to take this step and thereby demonstrate willingness to enable NPS to fulfill its mission.

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**Proposal 187. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal would change the boundary and expand the predator control program in Unit 16B.

When the Unit 16B predator control program was expanded to include parts of Unit 16A the Board carefully considered the boundaries. To change the boundary now and expand the area is unwarranted.

The individual promoting the expansion of the predator control program in Unit 16 provides no biological data to support his proposal, nor has the ADF&G.

We urge the Board to retain the current boundaries.

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**Proposal 188. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal would increase the intensive management moose population and harvest objectives for the Unit 16B predator control program.

The Board carefully reviewed the moose population and harvest objectives for this predator control program when it expanded the boundaries to include parts of Unit 16A. This was done with input from ADF&G that provided background information on the biological issues and scientific data on estimated carrying capacity of the region. There is no new information indicating the Board's decisions were flawed and there is no compelling reason to increase the IM objectives now.

We urge the Board to retain the IM objectives contained in the current implementation plan as there is no scientific justification for increasing the harvest objectives in this GMU.

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**Proposal 189. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal would allow helicopters to transport hunters in the Unit 16B predator control program area and allow summer baiting of bears.

**Use of Helicopters:**

The Board has already authorized the use of helicopters in the Unit 16 predator control program. The requested regulatory language change is not in response to a biological need, but a deplorable attempt to continue to force a political agenda on the ADF&G. This proposal attempts to mandate the conditions of a predator control permit, further restricting the ADF&G's ability to manage with the best available science and with the flexibility to use adaptive, case by case, management strategies.

The ADF&G has refused to allow helicopter use in the conditions of a predator control permit regardless of the Board's authorization and for good reason. The biological risk to the wildlife populations is so excessive and the enforcement challenges are so significant that it does not warrant their use. Helicopters allow unlimited access to any location in the region and to 100% of the wildlife resources. In addition, the permit would allow an individual to land and shoot black bears, encouraging the illegal chasing and harassing of black bears, especially the highly coveted "trophy" bears. Enforcement of regulations would be chronically undermined even further by requiring state wildlife troopers and the Big Game Commercial Services Board investigator to be forced to rely on the state's limited supply of helicopters. Using helicopters to fly in people and equipment would promote illegal landing strip "improvements" for fixed-wing aircraft in remote, previously inaccessible, regions as well, allowing even further degradations to the wilderness ecosystems.

**Extending the Baiting Season into the summer months:**

Bear baiting during summer may result in bears injuring humans when they encounter bait stations with bears nearby. Hikers, berry pickers, boaters and fisherman using the country during summer are apt to encounter bait stations, many of which are unused by hunters except on weekends. Bait stations without a hunter present with sows and cubs nearby are especially hazardous. Brown bears are known to aggressively defend food sources and may attack humans who approach them.

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We urge the Board to not support this proposal.

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**Proposal 190. We *oppose* expanding the options for intensive management and wish to provide comments on the general concept of allowing additional options for intensive management.**

This proposal solicits public comments but proposes no specific regulatory changes.

In June 2008 ADF&G killed 14 wolf pups in or near dens as part of a predator control program on the Alaska Peninsula. This created a storm of public protest. Questions were raised about the legality of wolf “denning” by ADF&G when this practice was specifically prohibited for individuals and agencies. Ethical objections were raised over the practice of killing helpless young pups, even if that action was part of a predator control program. These issues have yet to be fully and finally resolved. The ADF&G has even refused to provide details of how they killed 9 pups in their den.

Proposal 190 now mentions the use of carbon monoxide cartridges “as an option for euthanasia of wolves by government employees.” We assume this means killing young wolf pups at dens by means of these cartridges.

We oppose killing of helpless young wolf pups at dens by any and all means, including digging out dens, flooding dens, smoking out dens, or mechanically removing pups with twisted barbed wire or fish hooks. The use of carbon monoxide is no better or more humane than any of the other techniques despite its efficiency. In reality, carbon monoxide is poison gas that acts slowly to deprive the body of oxygen as it kills.

We specifically oppose the practice of denning and generally oppose expanding the arsenal of heinous techniques that are used to kill wolves. Alaska, in adopting additional, highly controversial methods of killing wolves, is dangerously close to being viewed as waging an inhumane war on a rare species that in most of the world is being conserved, protected and restored after centuries of persecution by humans.

We are surprised that ADF&G would be grossly insensitive to the concerns of millions of people worldwide, and we think it would be a serious mistake for the Board to authorize the use of poison gas to kill young wolf pups in dens at this time. Surely, the existing techniques for killing wolves are sufficient to accomplish the objectives of the wolf reduction programs. We need not resort to poison gas.

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**Proposal 192. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal if adopted would allow wolves and bears to be taken with helicopters in the Unit 16B predator control area.

There are many reasons to continue the long-standing prohibition on using helicopters to transport hunters or for private pilots to shoot wolves and bears. Legal use of helicopters for transport and shooting would encourage excessively large harvests as there are virtually no places that helicopters cannot access. Thus, there would be no refugia for bears and wolves with the possibility of over-harvest. Although the Unit 16B program is designed to reduce bear and wolf numbers, it is not designed to eliminate predators over vast areas.

The predator control program relies on anecdotal and extrapolated information to estimate wolf and bear numbers. The goal of the program is to reduce predators by as much as 80%. Such aggressive harvest rates should not be combined with the use of helicopters that allow unlimited access to the region. The potential to overharvest predators is far too great.

Many members of the public believe that hunters should operate under rules of fair chase especially when pursuing trophy species like bears and wolves. They do not consider predator control programs conducted by private hunters as exempt from fair chase. Helicopters represent the antithesis of fair chase to many ordinary people who might otherwise support predator control.

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**Proposal 197. We *oppose* this proposal and urge the Board to not adopt it.**

This would drop sealing requirements for bears for people not living on the road system.

Other than for convenience, there is no justification offered for this proposed regulatory change. Sealing bears is an extremely important management tool for ADF&G to accurately measure and analyze the harvest of bears in different GMU's. Sealing data determines where and how the animal was taken, as well as measurements and biological samples. Sealing also aids in curbing the illegal take of bears by identifying the specific area from which the bear was taken. Bear sealing requirements have been in effect since statehood and are a vital conservation measure to assure sustained yield of a valuable resource.

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**Proposal 199. We *oppose* this proposal and urge the Board to not adopt it.**

This would lengthen black bear baiting seasons in GMU's 7 and 15 (and others) from June 15 to June 30.

We oppose all bear baiting that applies to GMU's 7 and 15. One of the main reasons for the unacceptably high DLP kill (29 in 2006 and over a 100 since statehood) is human and pet food attractants. Bears can detect food odors at great distances, including garbage, pet food, bird food, fish-cleaning tables, fish smokers, fishing bait and bee apiaries. Once a bear develops a taste for certain food used at black bear bait stations, it often continues to seek out that food. Under state law it is illegal to feed bears and we believe that baiting bears constitutes feeding bears. ADF&G has little authority to manage non hunting activities that contribute to the rising trend in bears killed in DLP, but the BOG can eliminate bear baiting in areas where black and brown bears mix and food attractants are resulting in an unacceptably high level of DLP kills. Short of this, the use of cooking oils, fat, and other human food should be specifically prohibited as allowable baiting substances. It should be noted that of all the issues mentioned by the public in the development of the Kenai Peninsula Brown Bear Strategy in 2000, black bear baiting was mentioned most often.

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**Proposal 200. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal would exempt bears taken in predator control areas from annual bag limit restrictions in other areas.

Resident bear hunters in Alaska now have the opportunity to harvest large numbers of bears by hunting in the areas where predator control programs were adopted as well as in other areas. In recent years the Board has greatly liberalized bear seasons and bag limits and waived resident tag fees. The emphasis on bears as predators of ungulates and the need to reduce bears in order to increase ungulates for hunters has diminished the status and image of bears as trophy species. Further liberalization of bear hunting regulations is unwarranted at this time. If hunters choose to fill their bag limits by hunting in predator control areas, that decision might correctly affect their option to hunt in other areas. We see no reason to alter this fact.

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**Proposal 201. We *support* this proposal and urge the Board to amend and adopt it.**

The intent of this proposal, to have a wounded but not recovered animal count against the bag limit, is a concept long part of regulations governing hunting of trophy species in Africa and a strong component of the North American Model of Game Management's ethical standards. We find it to be a valuable addition to the hunting regulations in Alaska to enhance hunting ethics, and suggest that it be applied to all big game species statewide.

There is also precedent in existing BOG regulations. In Units 1-5, and in Unit 8, bears wounded by a hunter count as the bag limit for the regulatory year.

Wounded means there is sign of blood or other sign that the bear has been hit by a hunting projectile.

It is important to count wounded bears in the harvest statistics because bears that are never counted in the harvest statistics that later die result in misleading annual harvest data that could jeopardize sustained yield of the resource.

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**Proposal 221. We *support* this proposal and urge the board to adopt it.**

This proposal if adopted would extend the time that hunters are restricted from hunting after flying.

We consider this proposal an opportunity to further enhance fair chase hunting and we urge the Board to adopt it.

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**Proposal 224. We *support* the concept of having the Board continue protection for white-colored bears.**

White-colored morphs of black bears occasionally occur throughout the range of black bears in North America. They are very rare and may have spiritual significance for some people. They also provide viewing pleasure for many who are awed by the presence of such beautiful and rare animals. We urge the Board to continue protection for white-colored bears with whatever regulatory means are available. Failure to do so (with resulting loss of these animals to hunters) would create ill will toward the Board from many people who value wildlife as much more than mere game animals.

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**Proposal 235. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal would extend the Unit 19A predator control program six years.

As with the other predator control programs adopted by the Board starting in 2003, the Unit 19A program was not based on adequate preliminary information obtained from field studies. Such studies were recommended by the National Research Council Review (published in 1997) in order to meet their recommended standards designed to avoid unnecessary control programs based on unsound science. The purpose of conducting field studies is to properly justify control programs by documenting that predation is limiting prey populations rather than other factors including poor habitat, over-hunting and severe winters. Decades of research have shown that predation is not a universal limiting factor for moose populations in Alaska and it cannot be assumed that predator control will recover a depressed prey population in every case.

After several years of reducing wolves in Unit 19A, the Board is now faced with ending the program or renewing it. We suggest that before renewing it ADF&G should conduct a valid analysis of the available data to determine whether or not the program is working. The results we have seen thus far raise doubts about the success of this program. This brings into question the original justification for the program. If wolf predation was not the main limiting factor for moose at the outset, it is not surprising that moose numbers did not increase following reduction of wolves.

If the Board opts to renew the program we strongly suggest that valid monitoring and evaluation protocols be added to the implementation plan so that the success or failure of the program can be determined. The NRC review emphasized that many past predator control programs had uncertain outcomes because monitoring and evaluation were inadequate. The lack of adequate protocols in the current programs, if not remedied, will repeat the mistakes of the past.

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**Proposal 236. We oppose this proposal and urge the Board to not adopt it.**

This proposal if adopted would extend the predator control program in Unit 19D(East) five years.

The wolf control program in GMU 19D(East) is now in its 6<sup>th</sup> year. The initial justification for the program (that subsistence demand for moose was unmet) was flawed. Wolf control since 2003 has not produced more moose for hunters. The scientific value of the experiment has been lost. Valid monitoring and evaluation protocols are absent and costs of removing wolves are excessive. These facts indicate that the Board of Game should immediately terminate this wolf control program.

In March, 1995 the Board of Game (BOG) approved a wolf control program for the McGrath area (GMU 19D(East)) designed to reduce wolf numbers in that area by 80% in order to increase moose numbers to benefit hunters. This was in response to reports that the moose population had declined from several thousand in the 1970s to much lower numbers and wolves had increased greatly. However, the control program was not implemented at that time.

In 1999, the BOG again passed a wolf control program after local residents reported that moose numbers continued to decline. Again, the program was not implemented.

In 2000, Governor Knowles appointed a planning team to review the information and issue recommendations to the ADF&G. The team determined that a harvest of about 150 moose per year was required to meet subsistence needs of local residents and a moose population of about 3,500 was necessary to sustain the annual harvest. The planning team was told by ADF&G that only about 850 moose remained in the area and a crisis existed. The team recommended that bears and wolves be reduced and the hunting season in a portion of the area be closed in order to re-build the moose population. ADF&G accepted the recommendations and the BOG adopted them in spring 2001.

In November 2001, ADF&G conducted a moose census in the area that estimated a moose population of about 3,600. This indicated that previous censuses that estimated much lower numbers were in error. Plans to reduce predators were suspended because the estimate of 3,600 moose exceeded the estimate of about 3,500 needed to satisfy harvest demand.

In March 2003, a new BOG appointed by governor Murkowski revisited the issue and approved a control plan featuring aerial shooting of wolves in a portion of the area and a bear translocation effort. The BOG subsequently raised the intensive management moose population objective from 3,000-3,500 to 6,000-8,000. ADF&G staff reports to the BOG indicated that U.S. Census Bureau data showed the human population in the area declined from 868 in 1990 to 564 in 2000 thereby lowering the subsistence demand for moose. The fall 2002 moose harvest estimate was 100 based only on legally taken moose voluntarily reported by successful hunters.

A 2003 lawsuit challenging the McGrath predator control program revealed problems related to accurately estimating moose harvests (and thus determining whether or not intensive management objectives were met—one of the triggers for a control program). One problem was the magnitude of the unreported legal harvest. The planning team found that prior to 2001, for every 50 moose reported another 40-50 were probably taken legally but not reported. A second problem is the illegal (obviously unreported) harvest.

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ADF&G data from McGrath based on radioed animals indicated that 35 of 98 moose were killed legally by hunters and 12 were taken illegally. This indicates a ratio of about one illegally taken moose for every three legally taken. Thus, this information indicates that unreported legally taken moose may be as high as 100% of the reported harvest and illegally taken moose add an additional 30%.

This analysis indicates that the fall 2002 actual moose harvest likely exceeded 200 animals, much higher than previously estimated based only on the reported harvest. This, combined with the human population decline in the area, indicate that the BOG's finding that subsistence demand for moose in 2003 was not being met was likely in error. The finding that subsistence demand was unmet and intensive management harvest objectives were not achieved was the primary justification the BOG used to erroneously adopt a predator control program in 2003.

Predator control at McGrath began in fall 2003 and extends to the present time. Bears were translocated in the springs of 2004 and 2005 during moose calving season. Wolves were shot each winter. Following the bear translocations, moose calf survival from birth to November doubled. In the bear removal, area November calf:cow ratios were 51-63 calves per 100 cows—much higher than previously. This occurred primarily in a 520 square mile area termed the Experimental Micro-Management Area (EMMA). This was only a small portion of the 8,500 square miles in GMU 19D(East). Wolves were shot in an area of about 3,200 square miles (expanded to 6,245 square miles in 2006). The moose hunting season was closed in the EMMA in order to rebuild the moose population quickly.

In November 2004, another moose census was attempted but poor snow conditions terminated it before it was completed. An ADF&G memo summarizing the census data warned that extrapolating the 2004 data from the limited area censused to the entire area was not warranted. However, this was done with the resulting claim that moose numbers increased from 2001 to 2004. The invalid 2004 estimate (4,374) was compared to the intensive management population objective (6,000-8,000) to claim that the objective was unmet and therefore predator (wolf) control should continue.

No moose population censuses have been done since 2004 and the current number of moose in the entirety of GMU 19D(East) is unknown. Despite increased early calf survival following bear translocation, many of the calves "saved" from bears starved in the very severe winter of 2004-2005. ADF&G estimated that moose increased 30% in the EMMA (only 6% of the entire unit) mainly as a result of moving bears and closing the hunting season. Only 45 wolves were reported taken by aerial shooters between 2003 and 2007 including only 7 in 2007 from a population estimated at 98. There is no evidence that significantly more moose are now available to hunters in the 94% of the area outside the EMMA as a result of wolf control. With the small number of wolves taken recently by aerial hunters there is no indication that continuing wolf control will benefit hunters in the future.

Unfortunately, the main factor(s) responsible for the increases in calf:cow ratios and overall moose densities in the EMMA cannot be identified. At the May 2006 BOG meeting, BOG members and Department staff agreed that the scientific value of the McGrath predator control program was lost due to the way the program was conducted. Bear translocation, wolf reduction, and closure of the moose hunting season were all initiated at about the same time. As a result, it is not possible to determine which of these variables (or indeed, which other variables) are most important in producing observed changes in the moose population. The National Research Council Report (1997) strongly recommended that predator control programs be done so that results are clear. Unfortunately, the Committee's advice was not followed for the McGrath program.

Of the five currently active predator control programs in Alaska, the GMU 19D(East) program has the most complete data and has received the most effort by ADF&G to gather field data. Unfortunately, the study plan prepared in 2001 by ADF&G and peer reviewed by scientists inside and outside Alaska was shelved in 2003 when the new BOG approved the control program. Thus, the scientific protocols to adequately monitor and evaluate the results over time are not being implemented. This, in part, resulted in ADF&G and BOG agreement that the scientific value of the program was lost. It also argues against continuing wolf control. If, when control ceases, we cannot properly determine success or failure, why continue the highly controversial practice of aerial shooting?

The 19D(East) program is also the only one for which ADF&G has provided cost figures. Total expenditures 2 years ago were estimated at \$1.7 million. Surely, these have now risen. If 45 wolves were taken from 2003 to 2007, the state's cost per dead wolf was nearly \$38,000, not including the costs incurred by the aerial shooters or the public relations costs to the state due to the negative image of aerial hunting. Of course, we are well aware that much of the total cost was spent on activities not related to shooting wolves but ADF&G has not provided cost figures specifically for that activity.

What benefits have resulted from the cost of wolf removal? As stated above, there is no evidence that significantly more moose are available to hunters outside the EMMA as a result of reducing wolves, and there is no indication that continuing wolf control will produce more moose.

We maintain that the initial justification for wolf control at McGrath in 2003 overestimated subsistence demand for moose and underestimated subsistence harvests. Clearly, the moose population estimates prior to 2001 severely underestimated moose numbers actually present and provoked a "crisis" that never existed. Thus, the justification for wolf control was flawed at the outset.

We maintain that the wolf control conducted since 2003 has not "worked." It has failed to produce more moose for hunters. The modest gains in moose numbers in the EMMA were due to moving bears during moose calving season and closing the moose season. In the 94% of GMU 19D(East) outside the EMMA there is no evidence that moose have increased as a result of wolf control and no additional moose are being taken by hunters. The reported moose harvest in 2006-2007 throughout GMU 19D was 82, less than the 115 reported in 2002-2003 before wolf control began.

We agree with ADF&G and the BOG that the scientific value of the "experiment" at McGrath has been lost and we are unable to learn anything more there that may guide future programs. Indeed, we will likely be unable to assess whether or not wolf control worked and what factors likely limited the moose population.

We believe that it is most unfortunate that the peer reviewed study plan for McGrath was shelved before it was implemented in 2003. Now, in the absence of scientifically valid protocols to monitor and evaluate the program, one of the National Research Council's main recommendations has been breached—that the programs should be conducted so the outcomes are clear. A recent letter of concern by nearly 200 scientists sent to Governor Palin echoed this concern. In the absence of monitoring and evaluation protocols that compromise scientific validity, and with failure to accomplish management goals (more moose for hunters), the McGrath program appears to be a total failure.

We find that the costs of wolf control at McGrath are excessive, especially since control has not produced more moose for hunters. Continuing wolf control would expend more funds that might be better used for programs that have tangible benefits. These facts provide strong justification to terminate wolf control at McGrath immediately and we strongly urge the BOG to do so.



**Alaska Office**

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**Proposal 237. We oppose this proposal and urge the Board to not adopt it.**

This proposal would further liberalize bear regulations in the Unit 20E predator control program and establish a working group to recommend additional actions to reduce bear numbers.

**Harvest of Sows and Cubs:**

In 2008 the Board of Game authorized the harvest of sows and cubs in Unit 16. Harvest records clearly indicated that the regulation did not result in increased bear harvest. Hunters continued to prioritize for large male “trophy” bears. The public strongly opposes the hunting of sows and cubs.

**Use of snares for killing bears:**

Snares set for bears would catch many non-target species including moose.

Should a cub of any sow bear, either brown or black bear, become caught in a snare the potential for significant risk to the public is overwhelming.

Snaring brown bears has been proven ineffective in a recent brown bear capture program conducted by the ADF&G in southeast Alaska. Injured brown bears pose a significant safety risk to the public.

The public strongly opposes snaring of bears.

**Sale of bear hides:**

The State Wildlife Troopers have always recommended against allowing the sale of bear parts. Regulatory statutes are insufficient and incapable of ensuring legality of bear hides, especially in regards to location of harvest. The Board of Game has repeatedly ignored the advice of the state wildlife troopers and supported what many feel are regulations that promote “poaching” of bears for sale and profit. The Board of Game should listen to the advice and recommendations of the State Wildlife Troopers and defer to their knowledge and experience.

**Same day airborne hunting:**

Virtually unenforceable and highly unpopular with the citizens of Alaska. Promotes the hunting of trophy bears by air, running them to exhaustion and then landing to shoot.

**Working Groups:**

If a working group is established we request that it include members from conservation and environmental groups—these are excluded from the list of potential members included in the proposal. We also request that biological input to the working group come from biologists outside ADF&G to ensure objectivity.

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[www.defenders.org](http://www.defenders.org)

**Proposal 238. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal if adopted would create a wolf control program in Unit 21E.

Please see our comments on proposal 239.

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**Proposal 239. We *oppose* this proposal and urge the Board to not adopt it.**

This proposal if adopted would create a wolf control program in Unit 21E.

The draft implementation plan in the proposal indicates a lack of field studies demonstrating that wolf predation is a major limiting factor for moose in Unit 21E. Absent such studies it cannot be assumed that reducing wolves will ultimately increase moose numbers and benefit hunters. Over-hunting, bear predation, poor habitat or severe winters, rather than wolves, may be limiting moose population growth. If so, removing wolves would have no effect. Wolf predation cannot be assumed to be a universal limiting factor for moose across all of interior Alaska.

We suggest that the Board require ADF&G to conduct adequate field studies to identify major limiting factors of moose in Unit 21E before debating this proposal.

The draft implementation plan indicates that moose numbers in Unit 21E have not declined to very low levels and labels the control plan as “proactive” in the hope that it might prevent such a decline. If wolf control is not currently limiting moose, controlling wolves will not be proactive in preventing a moose decline. The only way to assess the likely outcome of reducing wolves is to demonstrate at the outset whether or not wolf predation is limiting moose population growth. This proposal merely assumes wolves to be limiting moose. That is insufficient justification for a wolf control program.

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Feb 14, 2009

Mr. Cliff Judkins

Dear Mr. Judkins,

As someone who cares about wildlife conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on at its next meeting in Anchorage.

Please consider my comments as you review the proposals that have been submitted for your vote -- many of which are excessive, unscientific and unjustified attempts to benefit hunting interests and continue the state's extreme approach to predator control -- as they will have lasting consequences for Alaska's wildlife and for future generations of Alaskans.

I urge you to VOTE NO on:

\* Proposals 76, 130, 131 and 135, which seek to increase brown bear hunting in Unit 7, 13 and 15.

\* Proposals 49, 50, 68 and 69, which seek to create a new predator control program aimed to reduce brown bears and wolves in Units 9 and 17. This proposal was put forth by an Advisory Committee and is supported only by anecdotal claims about bear and wolf predation on moose. Anecdotal evidence is insufficient justification for creating new predator control programs, as seen in McGrath in 2000 and 2001.

\* Proposal 75, which would allow brown bears in Unit 13 to be taken over bait stations, and also on Proposals 166 and 171, which would modify the predator control program in Unit 16B to allow baiting of brown and black bears all summer and allow the use of snares and traps to take black bears. The aggressive means of harvest in this Unit has been shown to be ineffective and should be revoked -- not further liberalized. Furthermore, allowing bear baiting during the summer months will only compound the problem by habituating bears to human food and further compromise public safety and private property.

\* Proposals 189 and 192, which would allow helicopters to transport

hunters to the Unit 16B predator control area, authorize the baiting of bears in the summer and, for the first time ever, permit private citizens to use helicopters to access remote areas in order to kill wolves and bears.

\* Proposal 168, which would allow same-day aerial hunting of black bears in Unit 16 and allow helicopters to be used to transport hunters including, for the first time ever, out-of-state hunters to remote locations, without imposing any bag limits. This proposal also, for

the first time, seeks to allow youth to participate in predator control programs. Our state predator control programs require all individuals who participate to sign a legally binding agreement, and minors cannot sign such agreements.

\* Proposal 170, which would allow trapping and snaring of bears in Unit 16 under a predator control permit. Trapping and snaring bears has long been prohibited in Alaska with good reason. Steel leg-hold traps large enough to hold bears are a danger to people, pets and other non-target wildlife like caribou and moose. In addition, this capture method raises serious ethical concerns. Bears wounded in snares or traps could escape, resulting in a prolonged, inhumane amount of suffering. The public strongly opposes snaring of bears. I urge you to reject this proposal.

\* Proposals 125 and 128, which seek to create predator control programs in Units 7 and 15 and allow black bear hides and skulls to be sold,

which would only promote the illegal harvest of bears for profit and go against the recommendations of State Wildlife Troopers. In addition, allowing the sale of bear parts has not been effective in increasing black bear harvest, as evidenced in Unit 16.

\* Proposal 170, which seeks to allow trapping and snaring of bears -- a practice that has been long prohibited in Alaska -- in Unit 16 under a predator control permit. Traps large enough to snare bears are a serious danger to humans, pets and other non-targeted wildlife.

\* Proposals 132 and 153, which would threaten Kenai Peninsula

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RECEIVED TIME FEB. 14. 3:26PM

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bears by eliminating their status as a species of special concern.

\* Proposal 237, which would allow brown and black bears, including sows and cubs, to be killed using snares and same-day airborne hunting in Unit 20E. This proposal flies in the face of decades of tradition where cubs and mother bears have been protected from hunting and will undoubtedly be unpopular with the majority of Alaskans. We should continue to protect bear cubs and sows in Alaska. In addition, snares are indiscriminate and can catch many non-targeted species, including moose, and if a cub gets caught in these traps, the danger to the public posed by its mother could be severe. This proposal would also establish a working group to recommend additional actions to further reduce bears in this area. If a working group is established, I hope you will include representatives from the scientific and conservation communities.

\* Proposal 239, proposed by the Alaska Department of Fish and Game (ADFG), which would establish a new predator control program targeting 80% of the wolves in 8,000 square miles of Unit 21E (Proposal 239) -- even though they have no reliable data on how many wolves are in the area. How can the ADFG claim that predator control is justified or assert that state personnel will not shoot 20% of the wolves if they don't know how many wolves are there to begin with?

\* Proposals 235 and 236, which would extend the predator control program in Unit 19A by six years and in Unit 19D (East) by five years, respectively. Neither program has ever been scientifically justified, and if the Board votes to continue them, it should conduct the studies necessary to prove that wolf predation is the main limiting factor for moose.

\* And, finally, Proposal 190, which the ADFG has put forward to allow state personnel to use carbon monoxide bombs to kill wolf pups in their dens. As you know, denning in general is incredibly unpopular with

Alaskans and using poisonous gas in order to conduct denning is likely to be met with public outrage.

On the positive side, I would like to express my support for several proposals which will have positive impact on Alaska wildlife and the wildlife-viewing public.

These include proposals on the table to end lynx and wolverine trapping in Chugach State Park (Proposals 22 and 27, respectively), decrease the harvest of brown bears in Katmai, Lake Clark, Wrangell St. Elias and Denali National Preserves (Proposals 44, 45, 51, 77, 78 and 174) and

close the brown bear hunting season where much-loved McNeil River bears can be found after leaving the falls in the autumn (Proposal 43). And, finally, I urge you to support Proposal 224, which calls for the Board of Game to continue to protect white-colored bears, which are extremely rare, provide viewing benefits to Alaskans and tourists alike, and are of spiritual significance to many Alaskans.

I hope you will take my views, and the views of other Alaskans who care about responsible, science-based wildlife management, into consideration as you review and vote on these important proposals.

Sincerely,

Ms. Elizabeth Cheong  
19A Queen Mary Ave, New Lynn  
Auckland, None 00600

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RECEIVED TIME FEB. 14. 3:26PM

PRINT TIME FEB. 14. 3:29PM



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FEB 04 2009

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703-358-1930

**Nathaniel Perry**

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February 4, 2009 08:59 PM

Alaska Board of Game Chair Cliff Judkins  
Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

Subject: Sport-Hunting in Alaska's National Preserves

Dear Alaska Board of Game Chair Judkins,

When the Alaska Lands Act passed in 1980, Congress recognized that some lands destined for management by the National Park Service should remain open for sport hunting, so long as wildlife populations remained healthy. Unfortunately the State of Alaska's Intensive Management regime is in direct conflict with the policies of the National Park Service policy which says that NPS "does not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species (i.e., predator control), nor does the Service permit others to do so on lands managed by the National Park Service."

The impact of Intensive Management on parklands has caused a steady liberalization of season lengths and bag limits, the purpose of which was to increase hunter success for wolves and bears as a way to decrease their population and reduce predation on moose and caribou.

I support the following proposals before the Game of Board:

Proposal 51- season length and bag limit for brown bears in Lake Clark National Preserve

Proposal 64- season length and bag limit for wolves in Lake Clark, Katmai and Aniakchak national preserves

Proposal 67- bag limit for wolves in Lake Clark National Preserve

Proposal 77- season length and bag limit for brown bears in Wrangell-St. Elias National Preserve

Proposal 78- season length and bag limit for brown bears in Wrangell-St. Elias National Preserve

Proposal 112- bag limit for wolves in Wrangell-St. Elias National Preserve

Proposal 174- season length and bag limit for brown bears in Denali National Preserve

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Proposal 186- bag limit for wolves in Denali National Preserve

Only when these proposals are adopted will state hunting laws no longer be in conflict with Park Service regulations.

Thank you for the opportunity to comment.

Sincerely,  
Nathaniel Perry  
PO Box 2  
Shaktoolik, AK 99771

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