

Alaska Board of Game
Southcentral Region
March 26-30, 2011

Public Comment Index

1. Alaska Professional Hunters Association
2. Backcountry Hunters and Anglers
3. Port Graham Native Association
4. Linda Shaw
5. Chugach State Park Citizens Advisory Board
6. James Green
7. Department of Natural Resources
8. John Bridges
9. Tina Brown
10. Friends of Chugach State Park
11. Kelly Miller
12. Kenai National Wildlife Refuge
13. Patricia O'Brien
14. Michelle Tenny
15. Alaska Wildlife Alliance
16. Defenders of Wildlife
17. Brian Blossom
18. Gary Keller
19. Girdwood 2020
20. Liliana Naves
21. Thomas Rothe
22. Kate Sandburg
23. Alaska Trappers Association
24. Smokey Don Duncan
25. USFS
26. Chris Kostelecky
27. Kevin Desmond
28. Carol Jo Sanner
29. Margaret Tyler
30. William Lazarus
31. Jonnie Lazarus
32. Gary Munoz
33. Cynthia Lietzau
34. Tyler Welker
35. Denise Saegh
36. Andrew Ramey
37. Lance Raymore
38. Ahtna
39. Warren Brown
40. Alaska Frontier Trappers Association
41. Intentionally left blank
42. Lee Peterson
43. Intentionally left blank
44. Gail Ruth Peckham
45. Marybeth Holleman
46. National Park Service
47. English Bay Native Corp.
48. Billie Young
49. Tad Fujioka
50. Tony Russ
51. Dan Dunway

ALASKA

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March 11, 2011

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SPRING 2011 BOARD OF GAME SOUTHCENTRAL MEETING 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 2011 Southcentral 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 dependent 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.

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. 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.

- 3. Moose harvest restrictions of 50 inch or certain 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.**

PROPOSALS THAT APHA OPPOSES: 123, 133, 134, 169, 173, 187, 190, 197, 199

PROPOSALS THAT APHA SUPPORTS: 94, 136, 153, 156, 171, 174, 200, 201, 214, 218, 219

PROPOSALS THAT APHA SUPPORTS WITH AMMENDMENT: 186, 217

PROPOSALS THAT APHA HAS COMMENTS ON BUT DEFERS TO THE CONSIDERATION OF THE BOARD: 215

INDIVIDUAL PROPOSAL COMMENTS

Proposal 94: Support, Recent surveys show a large surplus of bull moose in this region that amply justifies a nonresident hunt. Historical resident and nonresident combined harvest would support an opening as well. Nonresident hunters provide the majority of the wildlife conservation funding that provides for our IM programs. They should be allowed to participate when harvestable surpluses occur. We recognize that the older age class of bull moose become a unique population during IM enhancement programs. Additionally nonresident opportunity also provides for important and needed Alaska economy and meat sharing. They also often harvest predators while moose hunting which also helps with ungulate recruitment efforts.

Proposal 123: We continue to oppose "special hunt" provisions which exclude other hunters. This type of development reduces hunting opportunity for the general public and in many cases, recruitment or retention of hunters in general in exchange for giving a certain type of hunter a preference. In this region and species specific, any additional harvest works against future general season hunting opportunities for all hunters and against the good conservation basis that the general hunts are maintained within.

Proposal 133 and 134: Oppose, Nonresident opportunity within this region is established within a conservation basis. Nonresident opportunity provides for related wildlife conservation funding measures which in turn provide for the harvestable surpluses of wildlife that all hunters and people who enjoy the benefit of prudent stewardship. Additionally, it provides for important and needed Alaska economy and meat sharing.

Proposal 136: Support, Based on its given merits.

Proposal 153: Support, Based on its given merits.



Proposal 156: Support, Based on its given merits.

Proposal 169: Oppose, Although we agree with the enhanced active management strategies within this proposal we oppose the deletion of nonresident opportunity. We need to work together to address wildlife management that provides for 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. Nonresident opportunity provides for important wildlife conservation funding as well as economy for Alaska. Nonresident opportunity in this region is already very restricted and is easily sustainable.

Proposal 171: Support, Based on its given merits.

Proposal 173: Oppose, We need to work together to address wildlife management that provides for 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. Nonresident opportunity provides for important wildlife conservation funding as well as economy for Alaska. Nonresident opportunity in this region is already very restricted and is easily sustainable.

Proposal 174: Support, Based on its given merits.

Proposal 186: Support with Amendment, APHA has long objected to same day airborne provisions for black bear baiting with concerns related to abuse of the opportunity for hunting other species. Using an aircraft to access hunting areas is a important part of hunting in Alaska. However, unlike boats or ATVs or ORVs etc., airplanes can and do provide the hunter or pilot with an exceptional ability to spot game. This is why most of Alaska's wildlife surveys are conducted by airborne methodology. As Alaska continues to mature, there will be an increasing amount of recreational activities other than hunting within wildland habitats. It is important that airplane use for hunting is kept within an ethical and public acceptable threshold.

We do support the concept that airplane access should be allowed for access to black bear bait stations within IM regions. There is a long record of this abuse in Alaska. If this means and method are adopted, we urge that it be amended to disallow whenever there is an ungulate hunting season opening and that the use of the airplane be defined strictly for accessing black bear bait stations.

Proposal 187: Oppose, We have long opposed the trapping of black bears in general, but especially outside of IM regions. We do support the tightly defined and regulated black bear specific snaring methodology within IM regions where the reduction of black bear is needed to enhance low density equilibriums of ungulate species.

Proposal 190: Oppose, Nonresident opportunity within this region was established within BOG policy guidelines and within a conservation basis. Nonresident opportunity provides for related wildlife conservation funding measures which in turn provide for the harvestable surpluses of wildlife that all hunters and people who enjoy the benefit of prudent stewardship from. Additionally, it provides for important and needed Alaska economy and meat.

Proposal 197: Oppose, We have long opposed the trapping of black bears in general, but especially outside of IM regions. We do support the tightly defined and regulated black bear



specific snaring methodology within IM regions where the reduction of black bear is needed to enhance low density equilibriums of ungulate species.

Proposal 199: Oppose, This proposal would develop unacceptable and unenforceable regulations.

Proposal 200 and 201: Support, Based on their given merits. This is a simple solution to address a serious and longstanding problem. Additionally, this proposal will provide the long sought after ability to more effectively allow for Department of Commerce and Department of Public Safety to address illegal transporting concerns.

Proposal 214: Support, This provision is being abused. As written, this proposal provides for appropriate guidelines that are much more compatible with the intent of the law and will allow for appropriate enforcement of the intent of the law.

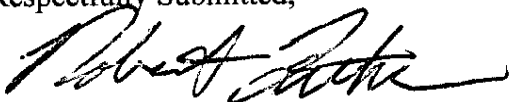
Proposal 215: We defer our position on this proposal to the discretion of the Board based after hearing the related public comment. We have members who support both oppose and support aspects of this proposal. We have asked them to bring their individual comments to the Board for consideration.

Proposal 217: Support with Amendment, We request that the Board consider protecting the innocent hunter making a clerical error versus willful falsification.

Proposal 218: Support, Based on it's given merit.

Proposal 219: Support, Based on it's given merit.

Respectfully Submitted,



Robert Fithian

Executive Director



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Facsimile Cover Letter

Date: February 18, 2011

To:

Alaska Department of Fish and Game

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SPRING 2011 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 2011 meeting in Wasilla and 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 dependent 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.

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 ongoing predator management regions as well as 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 too far too fast in initiating methodologies that may jeopardize the whole of the existing programs.

APHA asks for your support in developing expansion of proven management programs into like problem regions which are in need of relief related 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. 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.**
- 3. Moose harvest restrictions of 50 inch or certain 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.**
- 4. 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: 4, 6, 7, 8, 12, 13, 19, 20, 21, 25, 26, 27, 28, 29, 30, 31, 32, 35, 36, 37, 41, 52, 57, 60, 65, 66, 75, 76, 77, 78, 79, 80, 90, 101, 102, 105, 106, 115, 117, 120, 197, 199, 225, 227, 228

PROPOSALS THAT APHA SUPPORTS: 14, 17, 23, 24, 34, 51, 53, 74, 81, 118, 119, 121, 122, 200, 201, 214, 218, 219,

PROPOSALS THAT APHA SUPPORTS WITH AMMENDMENT: 5, 22, 33, 40, 54, 103, 114, 217,

PROPOSALS THAT APHA HAS COMMENTS ON BUT DEFERS TO THE CONSIDERATION OF THE BOARD: 116, 205, 215, 223,

INDIVIDUAL PROPOSAL COMMENTS

Proposal 4: Oppose, We prefer proposal 114 amended to a three mile radius of the communities. It is important to note that the brown bear harvest in this region has been increasing annually primarily on state lands. Additionally, the brown bear management plan for this region represents a established success that is recognized worldwide.

Proposal 5: Support with Amendment, Encourage taking no action on the fall season changes and amend spring season to **May 10-30**. This will allow for better targeting of bears which are adept in moose calf harvest.

Proposal 6: Oppose, Prefer proposal 114 amended to a three mile radius of the communities.

Proposal 7: Oppose, Prefer proposal 114 amended to a three mile radius of the communities.



Proposal 8, Oppose, This herd needs additional growth before human harvest should occur. We recommend looking at the health of the herd during the next BOG cycle and if harvest opportunity exists, allocation should be based on history of human harvest factors regarding resident and nonresident hunting opportunity. Federal matching funds for wildlife conservation measures such as are occurring within this area should to be respected.

Proposal 12 and 13: Oppose, Prefer proposal 14.

Proposal 14: Support, APHA commends ADF&G, and the participants in this working group for their good work with this solution. This proposal if adopted and adhered to by hunters will provide for a better accountability of conservation and private land based concerns.

Proposal 17: Support, Based on it's given merits. It will be important to monitor harvest annually to make sure harvest is kept within management objectives.

Proposal 19 and 20, Oppose

Proposal 21: Oppose, We support the IM concept of this proposal however, as written it appears to have alternative motives regarding future restrictions of hunting by nonlocal hunters.

Proposal 22: Support with Amendment, Amend and develop the program for wolves and not bears. The number of bears that would have to be harvested per wolf to affect caribou or moose recruitment is very high, as high as sixty to one. Utilize proposal 114 as an additional bear harvest tool.

Proposal 23: Support, based on its given merits.

Proposal 24: Support, based on its given merits.



Proposals 25, 26, 27, 28 and 29: Oppose, These proposals and the issues brought forward with them all suggest need for better overall wildlife management for all species within GMU 17. When moose and caribou population densities drop to low levels, the brown bear caused mortality on the declining prey species increases accordingly. Should Alaska jeopardize its world renowned brown bear management programs with extreme liberalization of season dates, means and methods of harvest whenever this occurs is a question we have to consider for the best interest of our overall wildlife conservation integrity.

APHA member guides who have a long history of operating in this region are reporting increasing numbers of wolves and declining moose populations. We encourage the BOG to work with the Department to develop a comprehensive predator management program that includes defined rationale and goals that will effectively help moose and caribou populations recruit to prudent carrying capacities.

We also encourage the BOG to look at proposal 114 and consider adopting a similar strategy for GMU 17.

Proposals 30, 31 and 32: Oppose, Existing season dates, bag limits and allocation all have been established in recent BOG cycles to help rebuild this herd and still provide for subsistence need. We prefer to see status quo management and let the herd continue to rebuild before maximizing harvest opportunity.

Proposal 33: Support with Amendment, Amendment would allow for RM 587 permits to be provided in Port Alsworth and Iliamna as well as Dillingham. There are several guides who live in or operate from Port Alsworth and Iliamna who have to fly their clients to Dillingham to secure these permits. If these two additional areas would be allowed to issue the permits, hunter effort would increase in keeping with moose conservation concerns.

Proposal 34: Support, Based on its given merits. This herd is growing and expanding. Nonresident opportunity should be allowed. The management guidelines developed for rebuilding this population of moose unnecessarily exclude nonresident hunter opportunity. Nonresident opportunity provides for related wildlife conservation funding measures which in turn provide for the harvestable surpluses of wildlife that all hunters and people who enjoy the benefit of prudent stewardship. Additionally, it provides for important and needed rural Alaska economy and meat sharing.

Proposal 35: Oppose, Prefer proposal 33 as amended above.



Proposal 36: Oppose, We also encourage the BOG to look at proposal 114 and consider adopting a similar strategy for GMU 17, as well as our other recommendations within our comments on proposals 28-29. The nonresident moose harvest for this area is still sustainable and their harvest of fifty inch or four brow tine bulls is not affecting recruitment. Nonresident opportunity provides for related wildlife conservation funding measures which in turn provide for the harvestable surpluses of wildlife that all hunters and people who enjoy the benefit of prudent stewardship. Additionally, it provides for important and needed rural Alaska economy and meat sharing.

Proposal 37: Oppose, Prefer proposal 33 as amended above.

Proposal 40: Support with Amendment, Amendment would read: **Unit 13 Remainder: Resident and Nonresident Hunters, One Bear Every Regulatory Year, Season Dates: Aug.10 – June 15.** We agree with many of the concerns brought forward with this proposal and do not feel that the June 15 – August 9 seasons are needed or in the best interest of sustaining ongoing wildlife conservation needs. Nonresident hunter opportunity should not be reduced as it provides substantial and needed wildlife conservation support and local economy.

Proposal 41: Oppose, There is ample harvest opportunity for black and brown bear harvest by hunting without baiting in this region. Baiting does allow for harvest of black bears for food and hide/skull utilization in brush and forested regions and of course, extensive baiting efforts will draw brown bears where brown and black bear co-exist. Brown bears should not be hunted in this manner. The second degree of kindred law will continue to be abused, brown bear sows with young cubs will be targeted.

Proposals 51 and 53: Support, Wild sheep in this region are in low densities and there needs to be better science and accountability of this great and renowned population. We agree with the proposers of these proposals that allowing for harvest of $\frac{3}{4}$ rams paints a target on this area for hunters and will encourage additional harvest. We also agree in the standardization concept and related conservation concerns.

Proposal 52: Oppose, Prefer proposals 51 and 53. The wild sheep population in this region does not need additional harvest opportunity.



Proposal 54: Support with Amendment, We have always supported the data gathering aspect of the sheep sealing requirement regulation. However, defining of full curl, eight years old and broomed or broken horns has become discretionary and arbitrary between agencies and the public. **Our requested amendment would be for the Board to request affiliated public and agency cooperation to standardize the full curl definition in a manner that will minimize making bad hunters out of good hunters. This could possibly be done within a BOG subcommittee.**

Proposal 57: Oppose, Nonresident opportunity is sustainable in this region and provides for related wildlife conservation funding measures which in turn provide for harvestable surpluses of wildlife for all hunters and people who enjoy the benefit of prudent stewardship. Additionally, it provides for important and needed rural Alaska economy and meat sharing.

Proposal 60: Oppose, This proposal works against the management goals of the TCUA. The current moose population in this region needs management help to improve and enhance recruitment, not additional harvest at this time.

Proposal 65 and 66: Oppose, Wolf population has been kept at stable numbers in keeping with prey species enhancement to range carrying capacities and higher density sustained yield harvest levels. This balance promotes the best interest of all species of wildlife and all people who enjoy or depend upon the benefits of prudent stewardship. Nonresident opportunity provides for related wildlife conservation funding measures which in turn provide for the harvestable surpluses of wildlife that all hunters and people who enjoy the benefit of prudent stewardship. Additionally, it provides for important and needed rural Alaska economy and meat sharing.

Proposal 74: Support, Based on it's given merits.

Proposal 75: Oppose, Nonresident opportunity is sustainable in this region and provides for related wildlife conservation funding measures which in turn provide for harvestable surpluses of wildlife for all hunters and people who enjoy the benefit of prudent stewardship. Additionally, it provides for important and needed rural Alaska economy and meat sharing.



Proposals 76 and 77: Oppose, When moose densities drop to low levels, the brown bear caused mortality on the declining prey species increases accordingly. Should Alaska jeopardize its world renowned brown bear, overall wildlife management programs and existing Predator Management programs with extreme liberalization of season dates, means and methods of harvest of brown bears whenever these low density equilibriums occur is a question we have to consider for the best interest of our overall wildlife conservation integrity. We recommend a brown/grizzly bear season dates of August, 10 – June 15 in GMU 16, increased resident hunter recruitment effort through development and distribution of conservation media and working with the guide industry to enhance harvest efforts in defined and targeted regions.

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 78: Oppose, Brown and black bear need to be part of the GMU 16 IM program in a manner that does not jeopardize the whole of the program.

Proposal 79 and 80: Oppose, Prefer proposal 81. When professional hunting guides have to base their businesses overhead expenses and employment opportunities on the "luck of the draw" it puts them at a serious disadvantage in regards to prudent business management. Nonresident opportunity is sustainable in this region and provides for related wildlife conservation funding measures which in turn provide for harvestable surpluses of wildlife for all hunters and people who enjoy the benefit of prudent stewardship. Additionally, it provides for important and needed Alaska economy and meat sharing.

Proposal 81: Support, Based on its given merits. Nonresident opportunity is sustainable in this region and provides for related wildlife conservation funding measures which in turn provide for harvestable surpluses of wildlife for all hunters and people who enjoy the benefit of prudent stewardship. Additionally, it provides for important and needed Alaska economy and meat sharing in a time when Alaska needs increased economy and revenue generation.

Proposal 90: Oppose.



Proposal 101, and 102: Oppose, Wolf population has been kept at stable numbers in keeping with prey species enhancement to range carrying capacities and higher density sustained yield harvest levels. This balance promotes the best interest of all species of wildlife and all people who enjoy or depend upon the benefits of prudent stewardship. Nonresident opportunity provides for related wildlife conservation funding measures which in turn provide for the harvestable surpluses of wildlife that all hunters and people who enjoy the benefit of prudent stewardship. Additionally, it provides for important and needed rural Alaska economy and meat sharing.

Proposal 103: Support with Amendment: We recommend amending this proposal to: **brown/grizzly bear season dates of August, 10 – June 15 in GMU 16, increased resident hunter recruitment effort through development and distribution of wildlife conservation media and working with the guide industry to enhance harvest efforts in defined and targeted regions.**

APHA supports the continuation of the predator management program in this region with a specific focus on wolves and black bears.

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 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 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 too far too fast in initiating methodologies that may jeopardize the whole of the existing programs.



APHA asks for your support in developing expansion in additional problem like regions 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.

Should Alaska jeopardize its world renowned brown bear, overall wildlife management programs and existing Predator Management programs with extreme liberalization of season dates, means and methods of harvest of brown bears whenever these low density equilibriums occur is a question we have to consider for the best interest of our overall wildlife conservation integrity.

Proposal 105: Oppose: APHA has long objected to same day airborne provisions for black bear baiting with concerns related to abuse of the opportunity for hunting other species. There is a long record of this abuse in Alaska. If this means and method are adopted, we urge that the provision be disallowed whenever there is an ungulate hunting season opening.

Proposal 106: Oppose: We do not support trapping of black bears outside of predator management areas.

Proposal 114: Support with Amendment, Amendment would establish a three mile radius of communities rather than the proposed five miles. Bear harvest within GMU 9 under existing guidelines is increasing, especially on state lands. The five mile radius will in many cases implement this provision in areas that receive consistent guided hunter effort under the one bear every four year bag limit. The three mile radius would more appropriately address problem bears. Additionally, we encourage the Department to continue to work with lodges, residences, fishing sights and communities in the region to help establish ways to reduce human caused bear/human problems.

Proposal 115: Oppose, Nonresident opportunity within this region was established within BOG policy guidelines and within a conservation basis. Of course, guided hunter success is often higher than unguided whether the client be a resident or nonresident hunter. Nonresident opportunity provides for related wildlife conservation funding measures which in turn provide for the harvestable surpluses of wildlife that all hunters and people who enjoy the benefit of prudent stewardship. Additionally, it provides for important and needed rural Alaska economy and meat sharing.



Proposal 116: Defer to the Discretion of the Board, We strongly respect the ongoing research program and urge the BOG to reconsider the any ram strategy at each appropriate BOG cycle to review whether its goals are working.

Proposal 117: Oppose: We continue to oppose “special hunt” provisions which exclude other hunters. This type of development reduces hunting opportunity for the general public and recruitment or retention of hunters in general in exchange for giving a certain type of hunter a preference. In this region and species specific, any additional harvest works against future general season hunting opportunities for all hunters and against the good conservation basis that the general hunts are maintained within.

Proposal 118: Support, based on its given merits.

Proposal 119: Support, based on its given merits. We encourage adoption of this proposal for the regions addressable at this meeting and to address the remaining regions during the appropriate cycle. Please note that we feel that the “Mulchatna Herd” prior to its significant increase in population was actually made up of several different regional populations of animals. Acting on this proposal per the appropriate cycle may be more appropriate to the historical norm.

Proposal 120: Oppose, The historical population trend and the carrying capacity of this herd is not in keeping with this proposal. 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.

Proposal 121: Support, based on its given merits.

Proposal 122: Support, based on its given merits.



Proposal 197: Oppose, APHA has long objected to same day airborne provisions for general black bear hunting and baiting with concerns related to abuse of the opportunity for hunting black bear and other species. There is a long record of this abuse in Alaska which casts an ethical shadow on all hunters.

Proposal 199: Oppose, This proposal as written is unreasonable.

Proposal 200, 201: Support, Based on their given merits. This is a simple solution to address a serious and longstanding problem. Additionally, this proposal will provide the long sought after ability to more effectively allow for Department of Commerce and Department of Public Safety to address illegal transporting concerns.

Proposal 205: Defer to discretion of Board, There is long history of effort to eliminate other user groups from this region. We encourage the Board to watch for this concern as they deal with this proposal.

Proposal 214: Support, This provision is being abused. As written, this proposal provides for appropriate guidelines that are much more compatible with the intent of the law and will allow for appropriate enforcement of the intent of the law.

Proposal 215: We defer our position on this proposal to the discretion of the Board based after hearing the related public comment. We have members who support both oppose and support aspects of this proposal. We have asked them to bring their individual comments to the Board for consideration.

Proposal 217: Support with Amendment, We request that the Board consider protecting the innocent hunter making a clerical error versus willful falsification.

Proposal 218: Support, Based on it's given merit.

Proposal 219: Support, Based on it's given merit.



Proposal 223: Defer to discretion of Board: APHA has always maintained that antler, horn, claws or skull destruction or non-salvage of the same is a disrespectful practice. Disrespectful for both the animal and the hunter. We believe that all hunters have roots entwined within the same soils and that the reasons that we hunt cannot be defined by simple words of food, experience or success aspects but a combination of all of these reasons and the many thousands of years of hunting heritage that comes with them. We also feel that these nullification provisions adds to lack of recruitment and retention of hunters. We understand that some of Alaska's nullification requirements have been made to help manage wildlife resources and numbers of hunters. We urge the BOG to try to minimize this practice in the future and to readdress the practice wherever it comes up through the BOG cycles in keeping with fair allocation for all hunters.

Proposal 225: Oppose: We continue to oppose "special hunt" provisions which exclude other hunters. This type of development reduces hunting opportunity for the general public and recruitment or retention of hunters in general in exchange for giving a certain type of hunter a preference. In this region and species specific, any additional harvest works against future general season hunting opportunities for all hunters and against the good conservation basis that the general hunts are maintained within.

Proposal 227: Oppose: We prefer status quo for these areas and are concerned that the online registration will take away from the effective ability of the Department to manage the hunt.

Proposal 228: Oppose: We continue to oppose "special hunt" provisions which exclude other hunters. This type of development reduces hunting opportunity for the general public and recruitment or retention of hunters in general in exchange for giving a certain type of hunter a preference. In this region and species specific, any additional harvest works against future general season hunting opportunities for all hunters and against the good conservation basis that the general hunts are maintained within.

End of APHA Written Comments.

Submitted by,

Robert Fithian



APHA Executive Director





BACKCOUNTRY HUNTERS AND ANGLERS ALASKA CHAPTER



Alaska Backcountry Hunters & Anglers (AK BHA)
www.alaskabackcountryhunters.org

Comments to the Alaska Board of Game Spring 2011 region II meeting

Proposals we **support**: 145, 148, 179.

Proposals we **oppose**: 180,181,182,183

Proposal 145 Lengthen deer season on Kodiak road system for hunters 18 and under during the archery and muzzleloader hunt.

SUPPORT

This proposal would increase opportunity for youth hunters to spend time afield with their family after school closes for the holidays.

Currently the deer season on Kodiak has little allowance for families to hunt together without pulling kids out of school.

Proposal 148 Add muzzleloader as legal method in current road system registration goat hunt.

SUPPORT

This proposal would add opportunity for hunters to pursue goats accessed from the road. The goat population on Kodiak is healthy, and the few additional animals that would likely be taken should not affect the numbers accessible from the road.

Proposal 179 Eliminate the Resurrection creek closed area

SUPPORT

The Resurrection creek area has been closed since 1980, for no biological reason.

Opening this area would give an opportunity for the few hunters who are willing to hunt in a non-motorized area for moose a chance to do so..



Proposals 180,181,182,183 modify or eliminate ATV use in Lower Kenai Controlled use area.

OPPOSE

AK BHA opposes any lifting of current ATV restrictions. The argument that ATV's are needed to "prevent wanton waste" is ridiculous. Hunters who "rely on motorized transportation" can hunt other areas. The current restrictions are serving their purpose, and should be left alone.

With the likelihood of more restrictive moose hunting regulations in unit 15 due to plummeting bull:cow ratio, it seems foolish to take any steps that would led to an increased harvest rate, such as additional ATV days.



Native Village of Port Graham

PORT GRAHAM VILLAGE COUNCIL
P.O. BOX 5510 • PORT GRAHAM • ALASKA 99603-5510
907-284-2227 FAX 907-284-2222

March 7, 2011

RECEIVED
MAR 11 2011
BOARDS

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

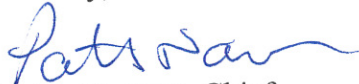
TO WHOM IT MAY CONCERN:

The Village of Port Graham and Port Graham Native Association would like to support Proposal number 156 which would allow a number of non resident goat hunters to obtain tags from our Village Council during the current registration hunt. We would request that the non resident tags would be allocated through our village council office just the same as the current resident tags.

Our hope is to bring hunters into the village in the fall and create jobs for locals and have the ability to utilize our rentals.

Thank you.

Sincerely,



Patrick Norman, Chief



Attn: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

From: Linda Shaw
9684 Moraine Way
Juneau, AK 99801

March 8, 2011

To whom it may concern,

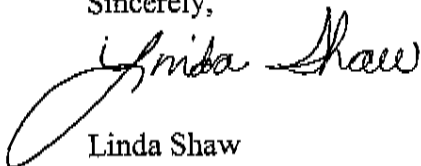
I have lived and worked in Juneau, Alaska since 1991. I am an outdoor enthusiast and am becoming increasingly concerned with the direction of wildlife management in Alaska. I am hopeful that wildlife in Alaska will be managed in a manner that preserves it for the current and future enjoyment of all Alaskans.

Proposals 130, 131, 132, 137, 140, 150, 151, 152, 153, 154, 155, 169, 172, 173, 174, 174, 176, 186, 187, 188, 189, 197, 198, 224, 226. Oppose: These measures propose increased takes of wolves, coyotes, bears and moose in various areas. I am opposed to all of these proposals because none of them presents any evidence or data to substantiate their claims. Wildlife management in the State of Alaska must be based on timely and sound science. Predator control programs must also be based on actual and timely field data that identifies real, and not perceived, limiting factors for ungulate populations which may include poor habitat, mismanagement due to heavy hunting and poaching, and severe winters. The Board of Game should make it clear that all such proposals will not be seriously considered without the required timely field studies to substantiate their claims.

Proposal 163, Support: I support this proposal because it is substantiated by justifiable evidence in an Alaska Department of Fish and Game analysis of changes in habitat and human encroachment on moose by humans in the northern Kenai Peninsula. More research of this nature should be done in other units to allow for realistic wildlife management based on science.

Thank you for the opportunity to comment.

Sincerely,



Linda Shaw





CHUGACH STATE PARK CITIZENS' ADVISORY BOARD

18620 Seward Hwy, Anchorage, AK 99516 Phone: 907-345-5014 Fax: 907-345-6982

February 21, 2011

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

Re: 2011 Board of Game Proposals – Anchorage Area Unit 14C

Dear Chair Judkins:

I am writing on behalf of the Chugach State Park Citizens Advisory Board (CSPCAB) regarding new regulatory proposals for Anchorage Area Unit 14C affecting Chugach State Park (CSP). Please consider these comments during the spring 2011 Alaska Board of Game (BOG) meeting.

The CSPCAB assists CSP staff in an advisory capacity with park management and development issues. As an advisory board, our decisions are guided by the five primary purposes established 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; and
5. To protect the existing wilderness characteristics of the easterly interior area.

The 15-member CSPCAB is comprised of a diverse group of recreational users (hikers, runners, cyclists, skiers, and snowmachiners, hunters, trappers, fishers, wildlife viewers (photographers, artists, etc...)) and includes representation from neighboring communities. With over 1.3 million visits to CSP last year, we are 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 U.S. and most of the park is located within the boundaries of the Municipality of Anchorage.

The CSPCAB has carefully reviewed the spring 2011 BOG regulatory proposals applicable to Anchorage Area Unit 14C - which we believe may have an impact on CSP. We have used information based on Alaska Department of Fish and Game (ADFG) data and a presentation from the department to our Board. The species population estimates referenced in our comments is based upon input from the department.



Our comments and recommendation for each proposal follow below. These recommendations passed unanimously during the February 14, 2011 CSPCAB meeting.

Proposal 130 - Oppose. Most of CSP is already open to black bear hunting. ADF&G estimates about 250-350 black bears in Unit 14C, many of which spend at least some time in CSP. In the past decade, the BOG established black bear hunts in the Eagle River and Eklutna Lake portions of the park. As a result, the annual black bear harvest is increasing in Unit 14C. In the 1990s, hunters took an average of 20 black bears/year in Unit 14C; in the past decade the harvest doubled to an average of 39 black bears/year. In addition, many black bears in Unit 14C are killed in defense of life or property (DL&P) or by motor vehicles. Combining harvest and other human-caused mortality, an annual average of about 61 black bears have been killed in Unit 14C in the past five years (2005-2009), with a record high of 87 bears reported killed in 2008. Sixty-one bears constitute 25% of the lower population estimate (250) and 18% of the higher population estimate (350). While recent harvests are likely sustainable, the harvest may now be approaching an unsustainable level. In our opinion, there is no need to increase the bag limit on black bears at this time and there are other hunts available.

Proposal 132 - Oppose. Black bears – Most of Unit 14C, including most of CSP, is already open to black bear hunting. The hunting season in the park is the day after Labor Day to May 31 (June 15 in upper Eagle River valley), with a bag limit of one black bear/year. Methods and means of harvest are similar to other units; however, baiting is prohibited.

Brown bears – Most of Unit 14C, including most of CSP, is open to brown bear hunting. The hunting season in the park is the day after Labor Day to May 31, with a bag limit of one brown bear/year. Methods and means of harvest are similar to other units. ADF&G estimates about 55-65 brown bears in Unit 14C, with most using CSP for denning. The combination of recent harvests, DL&P and road kills (10 in 2008, 11 in 2009) are already higher than the annual harvestable surplus of brown bears.

ADF&G's harvest objective in Unit 14C is to maintain populations of black and brown bears. This matches the objective in CSP, where bear populations are critical for maintaining biodiversity and viewing experiences, as well as hunting opportunity.

Currently there is no cap on the number of brown bears that can be taken in this unit. Current drawing permits are not completely used, so there is no need to create an unrealistic cap that would also be far greater than a biologically sustainable number.

Proposal 133 - Oppose. Dall sheep populations throughout Alaska have declined in recent years, primarily as a result of adverse winter conditions. In response, ADF&G has not issued any ewe permits in recent years for "rifle" hunts in Unit 14C. Bowhunters are allowed to take any sheep; however, their success rates are very low and few ewes and young rams are taken. In other words, hunting, and bowhunting in particular, is not contributing to the decline in sheep numbers in Unit 14C.

There is no biological need to reduce the number of permittees when "rifle" hunters are already restricted to full-curl rams. This would have little or no effect on sheep numbers. Leaving the



department's discretionary authority to issue ewe permits at a later date, when the sheep population recovers, will increase hunting opportunities for those who prefer to hunt sheep for meat rather than trophies and increase the availability of "less desirable" ewe permits for beginning hunters, including children, because the chance of obtaining a ewe permit is much higher than obtaining a full-curl ram permit. Also, kids are more likely to be successful sheep hunters because ewes are much more numerous than full-curl rams and are more likely to be found in less remote and rugged terrain.

There is no need for this new regulation. The department already has the authority to make this change, if necessary to protect the sheep population.

Proposal 134 - Neutral. This is an allocation issue. Nonresidents, with guides, tend to be more successful than residents, so adopting this regulation would lower the overall success rate and might lead to issuing more permits in many hunt areas to maintain historical harvest levels.

Proposal 135 - Oppose. The total number of goats in Unit 14C is unknown. Several goat registration hunts already exist in Unit 14C. CSP is the only goat habitat not already managed under registration hunts. Limited numbers of goats exist in CSP according to ADFG, and park drainages with harvestable goat populations are open to hunting with drawing permits. Replacing goat drawing hunts with registration hunts would likely lead to overcrowded hunting areas and jeopardize goat populations in these easily accessible drainages.

Proposal 137 - Oppose. Most of the park is now open to moose hunting under the general season, spike-fork/50-inch regulation and several drawing and registration hunts. The moose harvest objective was established in Unit 14C, like the rest of the state, by averaging historical moose harvests. The harvest objective for Unit 14C is 90-270 moose. In most years the harvest by hunters is near the lower end of this range. Many moose in Unit 14C are also "harvested" by motor vehicles—on average, about 160/year. While road-killed moose are not available for hunting, almost all of the meat is salvaged for human consumption, which meets the goals of intensive management. Combining hunter harvest and salvaged moose raises the total moose harvest in Unit 14C to the upper end of the annual harvest objective. Unit 14C already has a harvest significantly more than the 210 moose this proposal advocates. The combined annual harvest appears to be 15-20% of the unit's moose population, which is approximately the harvestable surplus. Decreasing the moose population, the intent of this proposal, is inconsistent with the state's intensive management laws.

Proposal 140 - Oppose. This proposal's sole purpose is public safety. Given that the ADFG already has a plan for addressing the area(s) where wolf-human confrontations pose the greatest concern, and given that no one has ever been injured or killed by a wolf in Unit 14C, we do not believe additional steps are required at this time.

CSP is currently closed to wolf hunting and trapping. The Anchorage, Eagle River, Eklutna Lake Management Areas and Anchorage Coastal Wildlife Refuge are also closed to wolf hunting and trapping, but would presumably be opened under this proposal. Only one wolf pack appears to spend most of its time in the park.



The one pack that has been involved in most of the human encounters and dog attacks spends most of its time on Joint Base Elmendorf-Richardson, where state law allows wolves to be taken but where wolf hunting and trapping is restricted by military access permits. In the “remainder” of Unit 14C and Unit 14A, the wolf hunting season is August 10 – April 30 and the wolf trapping season is November 10 to February 28 (14C) or April 30 (14A). Trapping is also allowed in the Birchwood Management Area, which is frequented by this pack.

The bag limit for hunters in Units 14A and 14C is five wolves/season and there is no limit on the number of wolves that may be trapped by an individual. The current wolf harvest in Unit 14C is less than one wolf/year by hunters. Increasing the bag limit from five wolves/season to two wolves/day is not likely to increase harvest because hunters can already shoot at least two wolves/day and repeat that feat another day, yet no hunters have shot two wolves/day in Unit 14C. Extending the hunting season into the denning period and summer months would also harvest wolves when pelts are in poor condition.

Proposal 141 - Support. This hunt is conducted in the upper Campbell Creek and McHugh Creek portions of CSP, requires annual reauthorization, and is consistent with park purposes. The reauthorization of the antlerless moose hunt in the Anchorage Management Area in Unit 14C will help reduce overpopulation, avoid over-browsing and reduce incidences of car/moose collisions. The hunt is well managed and has been run very smoothly over the years. It is an opportunity for Anchorage residents to participate in a hunt while not having to travel great distances or spending a lot of money on transportation. We believe the moose population in this area can continue to support this hunt.

Proposal 142 – Support. The “remainder” of Unit 14C, in this context, includes the Peters Creek and Hunter Creek drainages, large portions of which are in CSP. This hunt also requires reauthorization and is consistent with park purposes. The reauthorization of the antlerless moose hunt in the Birchwood Management Area and the remainder of Unit 14C will help reduce overpopulation, avoid over-browsing and reduce incidences of car/moose collisions. This hunt likewise is well managed and has been run very smoothly over the years. It is an opportunity for Anchorage residents to participate in a hunt while not having to travel great distances or spending a lot of money on transportation. We believe the moose population in this area can continue to support this hunt.

Proposal 143 - Support. These drawing and registration hunts are conducted in CSP, require annual reauthorization, and are consistent with park purposes. The reauthorization of the antlerless portion of the any moose drawing permit hunt in the Upper Ship Creek Drainage Area will help reduce overpopulation, avoid over-browsing and reduce incidences of car/moose collisions. We believe the moose population in this area can continue to support this hunt. This hunt likewise is well managed and has been run very smoothly over the years. It is an opportunity for Anchorage residents to participate in a hunt while not having to travel great distances or spending a lot of money on transportation.

We believe the moose population in this area can continue to support this hunt.



Proposal 187 – Oppose. This proposal would open a black bear trapping season within CSP in Unit 14C presumably anywhere there is an existing black bear hunting season, including Eagle River and Eklutna Lake management areas. “Trapping” in this proposal includes firearms, bows, and spears, in addition to bucket snares. The current hunting season for black bears is the day after Labor Day to May 31 or June 15 in the management areas and year-round in the “remainder” of Unit 14C.

Snaring black bears or shooting black bears under a trapping license, in heavily used portions of CSP and heavily developed portions of Eagle River would be controversial and could be hazardous to the public. Bucket snares can also catch small brown bears, especially cubs accompanied by sows.

Proposal 190 - Oppose. Refer to our comments on Proposal 133.

Proposal 191 - Oppose. This proposal could affect numerous drawing and registration moose hunts in CSP, where many discretionary conditions are used to gain approval from residents and other users and to minimize threats to public safety. For example, ADFG already uses techniques such as subdividing the hunt area to reduce crowding, hunter orientation and hunter education certification, hunting on weekdays only, and primitive weapon restrictions. Without these conditions, there will be proposals to close many of these hunts. We believe the department already has the expertise to apply the appropriate conditions and does not need this proposal.

Proposal 228 - Oppose. This proposal would create a moose hunt outside the boundaries of CSP; however, it would likely affect moose that also use the park. Many moose that use the park in summer and fall are forced into the lowlands outside of the park in late November and early December by accumulating snow, which reduces availability of food and increases energy expenditure. The "remainder" of Unit 14C includes moose winter habitat north of Peters Creek, along the Knik River, and in the Hunter Creek and Lake George drainages, all of which abut the park.

Moose populations are not high in Unit 14C, as the proposal claims. According to ADFG, the population is currently within the unit's population objective. Anchorage and the Mat-Su Borough have most of the state's human population, and thousands of local hunters are IBEP certified. Many bowhunters would be interested in participating in this hunt in their "backyard." For example, 362 bowhunters registered for the Eklutna Lake registration hunt in 2009, with an any-bull bag limit and a four-bull harvest quota. Similarly, 1,013 bowhunters applied for any-bull drawing permits in one of the Fort Richardson hunts in 2010 (with a 4% chance of obtaining one of the 39 permits). A general-season, any-bull, moose hunt during early winter in the "remainder" of Unit 14C would be at least as attractive as these hunts.

The goal of this proposal also appears to be to increase bowhunting opportunity. Unit 14C already provides more bowhunting opportunity than any unit in the state; e.g., hundreds of bowhunters participate annually in the Eklutna Lake portion of CSP. The Unit 14C harvest objective is being met, and many of these moose are either harvested in CSP or are moose that use post-rutting areas in the park in fall and move onto Fort Richardson in late November and early December where they are harvested in the winter hunt. Creating another late-season, any-bull



hunt in the "remainder" of Unit 14C is likely to overharvest moose in areas where existing hunting opportunities are already controlling the population.

Proposal 229 -Oppose. This proposal would affect moose in CSP. The only hunt area currently open in the Anchorage Management Area is DM666, the upper Campbell Creek and McHugh Creek drainages of CSP. This is an antlerless hunt that harvests 5 or more cow moose annually. According to ADFG, only 10 permits are issued because the hunt area is heavily used by recreationists. We believe the density of people using the hunt area during the moose season is greater than any other hunt area in Alaska. It is worth noting that this was once one of the most controversial hunts in Alaska. After a badly managed hunt in 1983, the BOG **rejected** numerous proposals to reopen the hunt during the next 20 years. Since the hunt was reopened, it has been well managed by ADFG and has been noncontroversial. The success of DM666 has recently convinced the Municipality of Anchorage to allow moose hunting in two of the large city parks listed in the proposal.

One way to make moose hunting in the Anchorage Management Area controversial again is to adopt this proposal. The proposal would require issuing at least 20 permits. It would require at least one permit to be for any bull. It would require archery-only hunts in large city parks and upper Rabbit Creek drainage.

Twenty permits: The proposal also asks the Board to increase the hunt area. Most of the Anchorage Management Area consists of small private parcels in an urban/suburban setting (where moose hunting is likely to be highly controversial), in the portion of CSP adjacent to the Anchorage Bowl, or in city parks in various sizes. The department has opened portions of the Anchorage Management Area to moose hunting, in consultation with CSP and city park officials. The current strategy is to increase the number of permits only when additional hunt areas within the Anchorage Management Area are established by the department. Requiring a minimum of 20 permits will result in overcrowding hunters and overharvesting cow moose in the existing, approved hunt areas in CSP.

Bull permits: Historically, proposals to open moose hunts in the Anchorage Management Area have argued that there are too many moose in the Anchorage Bowl, many of these moose starve to death in winter, and too many moose are hit by motor vehicles. This proposal is no exception. The Anchorage Bowl is the traditional wintering area for moose in CSP. Moose numbers will always increase in the developed lowlands as moose leave the park in early winter. However, DM666 and other recently created hunts in CSP (e.g., three hunts in upper Ship Creek) have significantly reduced moose numbers compared with a decade ago. With moose numbers reduced to the population objective, there have been no large, recent, winter die-offs. Numbers of complaints have also decreased compared to a decade ago, according to ADFG.

The current mix of antlerless hunts and any-bull hunts in and around the Anchorage Management Area has helped meet the unit's harvest objective while maintaining moose populations within the population objective. In areas close to Anchorage, the popularity of the hunts necessitates management by drawing permit or registration permits with limited participation. Too many hunters in a small area which is concurrently heavily used by others, such as DM666, will create controversy. Issuing one or more any-bull permits in antlerless-only hunt areas, where the



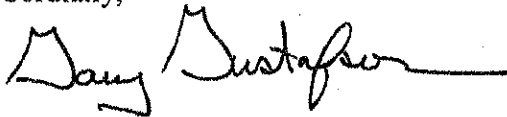
number of permittees is already as high as the area can tolerate, will reduce the number of cows harvested, diluting one of the primary reasons for these hunts: population control.

Archery-only hunts in city parks and upper Rabbit Creek drainage: The department already has the authority to issue moose drawing permits in city parks. The municipality has recently agreed to support moose hunts in Beach Lake Park and Edmonds Lake Park, near Mirror Lake. Creating a hunt in Far North Bicentennial Park or Kincaid Park will require further approval of the municipality. "Approving" these hunts before they are ready to seriously consider them will create the very controversy that will cause the Municipality to back away from the table. A similar situation occurs in the Rabbit Creek drainage, in CSP, where private in holdings and lack of public access complicate establishing a moose hunt area. It will be far more acceptable to the public and private landowners to allow the department to exercise the authority already granted by the Board by working with concerned parties to craft mutually acceptable hunts in the Anchorage Management Area.

Thank you for the opportunity to respond to the specific regulatory proposals submitted for the spring, 2011 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 as evidenced by our participation in the public review process.

Please let me know if you have any questions regarding these comments and recommendations. I can be reached at 907-865-4703. Thank you for your consideration.

Cordially,



Gary "Gus" Gustafson, Chair

Cc: Jessy Coltrane, ADF&G
Ben Ellis, Director, DOP&OR

ATTN: SouthCentral Board of Game
Alaska Department of Fish and Game
Boards Supports Section
P.O. Box 115526
Juneau, AK 99801-5526
FAX: (907) 465-6094

March 11, 2011

To Members of Southcentral BOG,

As a resident of Alaska I am an avid wildlife watcher. I appreciate the opportunity to view all forms of wildlife, including moose, deer, bear, wolves, and caribou. We need both predator and prey in a thriving wilderness, if one is absent then nature becomes out of balance and will cause even greater damage to the other species. With that in mind, I would prefer that the State doesn't target a species for killing unless absolutely necessary, and proven by scientific studies.

I am also opposed to hunting in an unsportsman like manner. That would include spotting with lights at night; chasing prey with a snow machine, truck or airplane; baiting and shooting from a stand; and flying into an area and engaging in hunting the same day.

I have the following comments for the Southcentral Region Board of Game meeting:

Proposal 130: I oppose this proposal.

Why are you raising the black bear bag limit in Unit 14C? I don't think the black bear population in this unit can support increased hunting. Sound wildlife management is based upon population data, and this is not provided.

Proposal 131: I oppose this proposal.

You should not increase the black bear bag limit in Unit 14C. There is no study or data provided to support the reasons for this proposal. Increased hunting/shooting in areas within the city limits of Anchorage is dangerous to people and passing cars.

Proposal 163: I support this proposal and think you should accept it.

This proposal would lower the moose harvest objectives in Unit 15A. We don't want to over hunt them. Lets try for sustainable hunting methods.

Proposal 169: I oppose this proposal.



Why change moose hunting regulations in Units 7 and 15, and raise the limits on wolves and bears, when there is no studies that support the claims in the proposal? We should study the wildlife population first before making a decision.

Proposal 172: I oppose this proposal for aerial shooting of wolves because it is unsportsman like, and there are no studies to support it.

Proposal 173: I oppose this proposal because I am against the aerial shooting of wolves. It is unsportsman like and is bad for tourism in the State.

Proposal 175: I oppose this proposal.

Using night lights for spotting is unsportsman like. It also could encourage shooting into the dark without fully seeing your target if an animal won't come to the light. I also see the potential for hunters shooting each other because of the dark conditions. Even in broad daylight with fluorescent orange hats, there are still accidents.

Proposal 176: I oppose this proposal.

Using night lights for spotting is unsportsman like. It also could encourage shooting into the dark without fully seeing your target if an animal won't come to the light. I also see the potential for hunters shooting each other because of the dark conditions. Even in broad daylight with fluorescent orange hats, there are still accidents.

Proposal 186: I oppose this proposal.

Same day airborne hunting of black bears at bait stations will result in terrible publicity to Alaska. The visitors to Alaska want to see all wildlife, moose, deer, caribou, and wolves and bear. Our standard no hunting on the same day of flight rule is fair and sporting.

Proposal 187: I oppose this proposal.

Why are you allowing trapping bag limits of 10 black bears? Are you declaring war on black bears? I have not scene any scientific studies that suggest we should take such a radical action.

Proposal 197: I oppose this proposal

We have prohibited same day airborne hunting for many years. If you allow this then it may result in some very bad publicity to the State of Alaska, and affect our tourist industry.

Proposal 226: I oppose this proposal.


A bag limit of 10 wolves per day is excessive, and chasing wolves with snow machines is unsporting. What data do you have to support this idea?

Proposal 230: I oppose this proposal.

It is irresponsible and dangerous to allow out of state hunters to hunt bear without a guide. The bears that come to these stations may be habituated to people and be dangerous.

Thanks for the opportunity to comment.

Sincerely,


James Green
PO Box 35401
Juneau, AK 99803



STATE OF ALASKA

Sean Parnell, GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF PARKS AND OUTDOOR RECREATION
CHUGACH STATE PARK18620 Seward Hwy
Anchorage, Alaska 99540
PHONE: (907) 345-5014
FAX: (907) 345-6982Attn: Goard of Game Comments
Alaska Department of Fish & Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

11 March, 2011

Re: 2011 Board of Game Proposals for Anchorage Area – Unit 14C and Statewide Proposals

Dear Chariman Cliff Judkins,

The following comments are provided on behalf of Chugach State Park for proposals that affect the park. Written comments for specific proposals are identified by the proposal number immediately followed by a recommendation either in **Support** of, or **Opposition** to, with a corresponding brief rational justification for the recommendation in accordance with Department of Fish and Game commenting instructions.

Proposal 130 Recommendation: Opposition

Hunting seasons and bag limits for black bear. The well established existing seasons and bag limits for black bear hunting within the park are appropriate and altering them would be detrimental. Chugach State Park currently provides numerous harvest ticket and registration permit opportunities for black bear hunting over vast stretches of the park during specific timeframes. All but one of these are set between Labor Day and Memorial Day, specifically to minimize potential encounters with non-hunting park users. To date, this has been a successful and reasonable segregation of legitimate park uses, it provides practical hunting opportunities during periods when there is substantially less likelihood that the general public will be in the areas open to hunting. Also, according to Fish and Game, additional harvest could easily result in a decline of black bears, which would diminish their opportunity for providing other desired benefits and value to the public, consistent with the legislatively designated purposes of Chugach State Park.

Proposal 132 Recommendation: Opposition

Hunting seasons and bag limits for black and brown bears. Specific details as to how the proposal would “liberalize” methods, means and locations for implementation are not articulated in the proposal. This makes it difficult to address this proposal without knowing what actually is envisioned in way of identifiable regulatory changes. The premise of this proposal is to reduce the number of bears. Chugach State Park believes that the existing bear population numbers appear appropriate, and will continue to work with Fish & Game on monitoring and evaluating the bear population situation within the park. Public safety issues associated with problem bears will continue to be dealt with utilizing appropriate authorities and management practices and this is felt to be the proper way to address the issue.

Proposal 135 Recommendation: Opposition

Hunting seasons and bag limits for goat. Goat hunting opportunities within Chugach State Park are managed through permit hunts which Fish & Game has increased over the last couple seasons. Adoption of this proposal may unnecessarily jeopardize (reduce) goat populations in the park according to Fish & Game. Additionally, adoption of this proposal would diminish the quality of the popular goat hunting experience by injecting overcrowding pressures on a challenging hunt if it were to shift from a controlled permit hunt to a registration hunt.



Proposal 137 Recommendation: *Opposition*

Hunting seasons and bag limits for moose. Chugach State Park provides numerous permit and harvest ticket opportunities for moose hunting over vast stretches of the park. According to Fish & Game, increasing the harvest of moose within Unit 14C could drive the population below the established population objective. The justification provided to almost double the harvest objective is the proposal's premise that there are too many moose, which is inconsistent with Fish and Games population objective. Altering the objective could result in the reduction of the moose population and lessen the opportunity for other equally legitimate benefits and value that moose provide to the public through wildlife viewing experiences.

Proposal 140 Recommendation: *Opposition*

Hunting seasons and bag limits for wolf. Wolf hunting is currently not permitted anywhere within Chugach State Park. Opening up portions of the park to year round hunting substantially increases the probability of negative interactions between hunters and non-hunters, and raises significant safety concerns. Chugach State Park does not believe that this proposal is the best way to accomplish the goal of reducing negative wolf/human interactions. Presently, Fish & Game is cooperating with the military and in the process of eliminating habituated wolves that are causing public distress. Given the situation, this targeted and controlled management methodology appears to be the proper and most effective way to address the issue. Opening up Chugach State Park to public wolf hunting under these circumstances may be met with strong public resistance and controversy.

Proposal 141 Recommendation: *Support*

Hunting seasons and bag limits for moose. This hunt has successfully demonstrates how additional moose hunting opportunities within Chugach State Park may be accommodated when managed appropriately. Through timing and other suitable hunting conditions specifically placed on this hunt, residents are provided a great chance to experience a non-congested moose hunt close to home. The continued utilization of Fish & Game discretionary hunting conditions and procedures is crucial to continue appropriate management of this successful and popular hunt.

Proposal 143 Recommendation: *Support*

Hunting seasons and bag limits for moose. Reauthorization of this antlerless moose hunt provides appropriate moose hunting opportunities within Chugach State Park. This hunt provides hunters with good prospects for quality moose hunting experience and is consistent with legislatively designated purposes of Chugach State Park and should be continued.

Proposal 187 Recommendation: *Opposition*

Furbearer trapping. Presently, black bear trapping is prohibited in Chugach State Park. The well established existing seasons and bag limits for black bear hunting within the park are appropriate. Opening the park up to black bear trapping would be detrimental and create substantial public safety concerns. As stated previously, Chugach State Park believes that the existing bear population numbers appear appropriate, so the need to reduce the population does not outweigh the risks associated with implementing this proposal. Subjecting Chugach State Park to black bear trapping under these circumstances may be met with strong public resistance and controversy.

Proposal 191 Recommendation: *Opposition*

Discretionary permit hunt conditions and procedures. A review of the discretionary hunt conditions and procedures applied to permit hunts is not, in and of itself, problematic. However, not knowing which specific conditions and procedures may be repealed does raise concern. Due to the volume and nature of permit hunts that take place throughout Chugach State Park, the potential for negative consequences associated with specific repeals exists. The conditions and procedures allow nuanced management tools to mitigate issues and reduce potential conflicts. They also help to accommodate statutory concerns when assessing competing park uses, thus facilitating the prospects for taking advantage of hunting opportunities that might not otherwise exist.

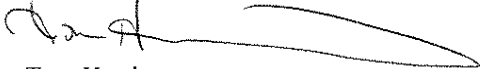


Proposal 229 Recommendation: Opposition

Hunting seasons and bag limits for moose. Chugach State Park concurs with the Department of Fish & Game recommendation, "Do Not Adopt" and the Chugach State Park Advisory Board's position against adoption of this proposal for those areas specifically within Chugach State Park boundaries. The hillside hunt, DM666, essentially takes place within a concentrated public use areas of the park. As noted previously for Proposal 141, this particular moose hunt, as it presently exists, provides a success story that can be pointed to as a model. Dramatically increasing the number of permits issued, including bow & arrow as a method, and expanding the hunting area may generate strong public resistance and controversy, as has been the case in the past. This is also especially true regarding the proposal's provision to include at least 1 permit to harvest a bull "trophy" moose. The Anchorage hillside is internationally renowned for its accessibility as a premier big game wildlife viewing destination. In addition to the large numbers of the general public that seek out viewing opportunities here, it is not uncommon to discover camouflaged photographers concealed near large bull moose. This one seemingly minor provision would dramatically elevate the potential for unacceptable risk to public safety by setting up a dangerous situation between two legitimate, but incompatible park activities.

I appreciate the opportunity to comment on the proposals being put before the Board Of Game for the spring, 2011 meeting. If you have any questions regarding any of these comments or the parks perspective, please call the number listed above.

Respectfully,



Tom Harrison
Superintendent

Cc: Jessy Coltrane, Alaska Department of Fish & Game
Gary Gustafson, Chair Chugach State Park Citizens Advisory Board



March 10, 2011

To: Alaska Department of Fish and Game
Boards Support Division

From: John Bridges
PO Box 332
Girdwood, AK 99587
907-230-2912

RE: Proposal 177

I oppose the closure of Portage Valley to Trapping and Snaring. Once again the Forest Service has forced it's agenda on us in Portage Valley with a result in limiting outdoorsmen. The joint venture with Ducks Unlimited for the Boardwalk Interpretative Site has closed all access to hunting. They build trails in the middle of nowhere for millions of dollars with out of state contractors and then restrict Alaskans and our way of life. I have a vested interest in Portage Valley, as I am a "Large Tract" property owner. The trail of Blue Ice is a nice trail. I have been on it many times. I also hunted this area long before the trail. In my opinion, the number of moose in this area has declined immensely and the number of predators has increased in my twenty years of time spent in the area. I have to believe there are plenty of places to let your dog "run wild" besides this area. Give me a break, these "voice command" dogs chase every moose they see during the worst possible time of year.

I don't trap, but I encourage ethical trapping in this area. Coyotes are rampant, their numbers are very high, while moose numbers are low. Whether or not the case is coyotes, loose dogs harassing them, or the construction of this barrier trail, I don't know. I just know that I don't want to lose another right based on a biased Forest Service Employee's proposal.



COMMENTS ON SOUTHCENTRAL REGION BOG PROPOSALS

From: tmbrown3@aol.com

To: tmbrown3@aol.com

Subject: Comments on Southcentral Region BOG Proposals

Date: Thu, Mar 10, 2011 2:40 pm

19400 Beardsley Way
Juneau, AK 99801

March 10, 2011

ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Supports Section
P.O. Box 115526
Juneau, AK 99801-5526
FAX: (907) 465-6094

To Whom It May Concern:

I am a resident of Juneau, Alaska, but I know you realize that, per our constitution, the wildlife in our state belongs to all Alaskans. I therefore especially appreciate the opportunity to comment on the proposals submitted for the Southcentral Region Board of Game meeting.

Before I list my comments, I want to make two points.

First, while I appreciate the opportunity for all Alaskans to submit proposals, I respectfully suggest that the Board of Game consider implementing a method to encourage proposal writers to base their proposals on reasonable evidence. Many of the proposals submitted this cycle call for action without providing any supporting data for the action, and frankly, this is a waste of your time, Boards Support's time, the various Advisory Committees' time, and the time of responsible Alaskans and groups that participate in the process.

Second, it is alarming how many proposals call for widespread killing of various animals with no consideration given to consequences to the ecosystems involved. Predators and their prey play critical roles in our environment, and any action taken to intervene in these roles must be carefully considered. This is clearly not the case with many of the proposals submitted this round, so I trust that you will make your judgements accordingly.

Now here are my comments to selected proposals.

Proposal 130. I oppose this proposal and urge the BOG to reject it.

This proposal calls for raising the black bear bag limit in Unit 14C, but it has not been shown that the bear population in this unit can support increased hunting. Sound wildlife management is based upon population data, and this is not provided.

Proposal 131: I oppose this proposal and urge the BOG to reject it.

This proposal calls for an increase of the black bear bag limit to 3 with no closed season in the rest of Unit 14C, but there is no evidence or data provided to support the claims in the proposal. Predator control programs must be based on field data, and this is absent.

<http://mail.aol.com/33356-111/aol-1/en-us/mail/PrintMessage.aspx>



Additionally, increased hunting in areas within the city limits of Anchorage and in Chugach State Park is dangerous and would conflict with other user groups.

Proposal 155: I oppose this proposal and urge the BOG to reject it.

This proposal would provide an unlimited bag limit with no closed season on coyotes in Units 7 and 15. There are no studies in Alaska to support this proposal. Additionally, this proposal represents de facto predator control, which should not be implemented without field study data. Also, coyotes play an important role in the ecosystems, and sound management of ecosystems benefits both wildlife and plant life.

Proposal 163: I support this proposal and urge the BOG to accept it.

This proposal would lower the intensive management moose population and harvest objectives in Unit 15A. It makes good sense to periodically re-visit intensive management population objectives so they can be adjusted to suit current situations. That's what good management does, no matter what the management targets may be.

Proposal 169: I oppose this proposal and urge the BOG to reject it.

This proposal calls for changing moose hunting regulations in Units 7 and 15 and for increasing the take of wolves and bears, but there is no substantiating data to support the claims in the proposal. Field studies would be required so that recent biological data would be available before making the decisions called for in this proposal.

Proposal 172: I oppose this proposal and urge the BOG to reject it.

This proposal calls for aerial shooting of wolves in Unit 15, but there is no evidence or data provided to support any of the claims in the proposal. Predator control programs must be based on solid field data. Additionally, Unit 15 is not suitable for aerial shooting because of the trees and because of the recreational user groups that frequent the area.

Proposal 173: I oppose this proposal and urge the BOG to reject it.

This proposal calls for a change in moose hunting regulations in Unit 15A and calls for a reduction of wolves and bears as part of an intensive game management program, but the proposal provides no evidence to support the claims made in it. Also, the proposal calls for same-day airborne and aerial shooting of wolves in 15A, which would be ineffective due to the terrain and which would conflict with and endanger the other user groups that frequent this area. Not only that, much of the area is managed by USF&W, and Alaska's intensive management programs are inconsistent with that agency's policies and mandates.

Proposal 175: I oppose this proposal and urge the BOG to reject it.

This proposal calls for the use of artificial lights at night to shoot black bears, wolves, and coyotes in Units 7 and 15, but the proposal provides no data to support its claims. Also, permitting night hunting of black bears would set a dangerous precedent and would be potentially harmful to hunters and other user groups in the area. These serious safety issues must come first.

Proposal 176: I oppose this proposal and urge the BOG to reject it.

This proposal calls for the use of artificial lights at night to shoot wolves and coyotes in Units 7



and 15, but no evidence is provided to support any of the claims in the proposal. The proposal should not be adopted without relevant field studies.

Proposal 186: I oppose this proposal and urge the BOG to reject it.

This proposal calls for same-day airborne hunting of black bears at bait stations in all units of Region 2, but same-day airborne hunting of big game animals in our state has not been permitted (with some exceptions) for many years. This proposal is a public relations nightmare that disregards any semblance of the law of fair chase.

Proposal 187: I oppose this proposal and urge the BOG to reject it.

This proposal calls for an annual trapping bag limit of 10 black bears for all units of Region 2. This is a public relations nightmare, as the BOG already knows, and the classification of black bears as furbearers is likely illegal to begin with.

Proposal 188: I oppose this proposal and urge the BOG to reject it.

This proposal calls for no bag limit for hunting coyotes in all units of Region 2, but the current bag limit of 10 coyotes per day is already excessive. Also, managing any ecosystem calls for responsible management of both predators and their prey. Coyotes play an important role in our ecosystems and must be considered as more than nuisances.

Proposal 189: I oppose this proposal and urge the BOG to reject it.

This proposal calls for no closed season and no bag limit for coyotes in all units of Region 2, but there are no studies in Alaska that document the claims in this proposal, and the existing bag limit of 10 coyotes per day is already excessive. Additionally, coyotes play an important role in our ecosystems and must be managed as such in order to keep both predators and prey healthy.

Proposal 197: I oppose this proposal and urge the BOG to reject it.

This proposal calls for same-day airborne hunting of black bears at bait stations in all units of Regions 2 and 4, but same day airborne hunting of big game animals in Alaska has been prohibited, with some exceptions, for many years. This proposal is a public relations nightmare, as the BOG already knows, and Alaskans respect the laws of fair chase, which this proposal ignores.

Proposal 198: I oppose this proposal and urge the BOG to reject it.

This proposal calls for no bag limit for coyotes in Units 13, 14, and 16, but the current bag limit of 10 coyotes is already too high. Also, coyotes are important predators that must be managed as such in order to benefit the entire ecosystem, thus benefiting the prey and the wild growth as well.

Proposal 226: I oppose this proposal and urge the BOG to reject it.

This proposal calls for an increase of the bag limit for wolves to 10 per day and calls for snow machine pursuit of wolves in Units 7 and 15, however no data is provided to support any of the claims in this proposal. Field studies must be done before any action is taken on this proposal.

Proposal 230: I oppose this proposal and urge the BOG to reject it.

<http://mail.aol.com/33356-111/aol-1/en-us/mail/PrintMessage.aspx>



Comments on Southcentral Region BOG Proposals

This proposal calls for a change in regulations requiring guides to accompany hunters at black bear bait stations. It is both irresponsible and dangerous to allow guides to be away from their clients at bait stations. I support the existing regulations that require guides to accompany hunters at bear baiting stations.

Thank you again for the opportunity to comment on the proposals for the Southcentral Region Board of Game meeting.

Sincerely,



Tina M. Brown

523-5402 (H)

209-4219 (C)

**FRIENDS OF CHUGACH STATE PARK
1408 P. STREET, UNIT "A"
ANCHORAGE, AK 99501**

March 11, 2011

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

Rc: BOG Meeting March 26-30, Southcentral

Dear Board Members:

Friends of Chugach State Park is a grassroots organization that appreciates and values Chugach State Park and works to protect its wilderness characteristics and wildlife. To the best of our knowledge all of our members live in or near Anchorage, Girdwood and Eagle River.

Proposal 128. Support. Close Wolverine Trapping in Units 6 & 14C.
The wolverine survey conducted in 2008-09, and testimony provided by area biologists at the 2009 Spring Meeting, made clear that continued wolverine trapping in the Twenty-mile drainage, and in that portion of Unit 6 lying west of College Fiords posed a threat to viability of the wolverine populations in Chugach State Park. Nevertheless, the Board of Game allowed wolverine trapping to continue in the Twenty-mile drainage and on the west side of College Fiord in Prince William Sound. We support restrictions that will allow this rare animal to continue to inhabit Chugach State Park.

Proposals 130-132. Oppose. Increased Bag Limits for Black and Brown Bear hunting. These proposals would increase the bag limits for black and brown bear in Unit 14C. Anchorage is a large city with most of its citizens



favor “watchable wildlife”. Problem bears should be removed, but these proposals are aimed only at the interests of a handful of hunters, and ignore the wishes of many residents of Anchorage.

Proposal 133. Partially Oppose. Dall Sheep in 14C. Full curl only restrictions allow more people to go hunting by minimizing the chances of success. We do not support full curl only restrictions because they have a negative impact on the gene pool of Dall sheep. Furthermore, there is good reason to believe that the taking of only the largest animals has negative impacts on population dynamics. Dall sheep should be managed for the health of the population. The first priority of management should be the wildlife, and not hunter opportunity.

Proposal 135. Oppose. Registration Hunt for Goat in 14C. This proposal would open the door to a free-for-all hunt for goat in Chugach State Park, and nearby areas, that might have negative impacts on the goats. Hunting in the Park for goat is reputedly very favored because it is carefully managed. The floodgates should not be opened.

Proposal 136. Oppose. More goat hunting in Unit 14C. This proposal is unclear, but we support careful, micro-management of hunting in Chugach State Park and throughout Unit 14C, and this proposal seems aimed at loosening controls.

Proposal 137. Oppose. Increase Moose Hunting Harvest Objectives. This proposal would increase the harvest objective for moose for the Anchorage Bowl from 110 to more than 210 annually. Our members and the majority of Anchorage residents like our moose, and oppose increased moose hunting in Anchorage and surrounding areas.

Proposal 140. Oppose. Wolf hunting throughout Unit 14C. This proposal would authorize wolf hunting and trapping throughout Unit 14C, including in Chugach State Park where wolf trapping has been banned since the early 1970's. The justification is one or two incidents with wolves acting too friendly toward people at Fort Richardson. We support reasonable measures aimed at public safety, but opening up all of Unit 14C to wolf hunting and trapping is unreasonable, and will effectively eliminate wolves in this part of the state. We find it hypocritical that wolves are eliminated in some parts of Alaska because there are allegedly too few moose, while here in Anchorage where there



Board of Game Comments
by Friends of Chugach State Park
March 11, 2011
Page 3 of 5

allegedly too many moose, the same people advocate killing all the wolves.

Proposal 187. Oppose. Trapping and snaring of bears. This proposal would appear to authorize the trapping of bears in Chugach State Park by establishing a bag limit. Friends of Chugach State Park is vehemently opposed to the trapping of bears in the Park. The trapping of bears has not been authorized in this part of Alaska since territorial days, and we believe it is unethical and cruel.

We note that there is a significant safety hazard posed by bucket snaring. In particular, bucket snaring involves the use of bait placed in bucket snares, and bait placed nearby. The bait is often left for weeks before bucket snares are placed on trees. That bait will result in habituation of bears, and these habituated bears will pose a threat to hikers and campers as they travel through and camp out in the Park.

Proposals 188, 189, & 198. Oppose. Unlimited coyote hunting and trapping. These proposals would have the Board set a year round hunting season with no bag limit for coyotes throughout GMU 14, including Chugach State Park. Naturally occurring wildlife populations and wildlife viewing are important values for Chugach State Park. We support these values and so do most residents of Anchorage and nearby communities. We oppose Proposal 189 because unlimited year round hunting of coyotes in the Park would be in conflict with these values.

We value the coyotes in Chugach State Park, and oppose treating coyotes as vermin. There is no scientific evidence that would support an effort to eradicate coyotes in the Park. Finally, we note that a 12-month open hunting season would pose a danger to the thousands of hikers, climbers, cyclists, bird watchers, children and other people who visit the Park in the summer months.

Proposal 187. Oppose. This proposal would appear to authorize the trapping of bears in Chugach State Park by establishing a bag limit. Friends of Chugach State Park is vehemently opposed to the trapping of bears in the Park. The trapping of bears has not been authorized in this part of Alaska since



Board of Game Comments
by Friends of Chugach State Park
March 11, 2011
Page 4 of 5

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Proposal 190. Oppose. Dall Sheep – No harvest of ewe. Dall sheep should be managed for the sheep. Healthy populations should be the first priority. It seems obvious that if only full curl sheep are taken by hunters, that natural selection will favor small animals. Furthermore, dynamics within sheep populations will be disrupted. The first priority of management should not be income for the department, or favors to residents. We believe that sheep hunting in the Park should be managed carefully, and with policies aimed specifically at the sheep, and the special circumstances in the Park.

Proposal 191. Oppose. Reduced authority to attach conditions. This proposal by the Board of Game requires the Board to review the Department's authority to attach conditions when permits are required to hunt in specified areas, or during specified times. Modification and limitation of the Department's authority appears to be the aim of the proposal.

We think that the Department needs broad discretion and authority in regard to permits issued for Chugach State Park because of the high use of the Park by hunters and non consumptive users, and its proximity to Anchorage, Girdwood and Eagle River/Chugiak. We oppose limitations on the authority and discretion of the Department to attach conditions.

Proposal 192. Support. Restrictions on trapping near trails. This proposal would restrict trapping near trails and roads throughout Region II, including Chugach State Park. We strongly support this proposal, and continue to find it appalling that dogs are killed every year because of traps. Many of us stay

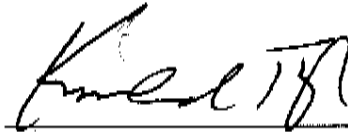


Board of Game Comments
by Friends of Chugach State Park
March 11, 2011
Page 5 of 5

out of areas of the Park during trapping season because of this danger to our dogs. We outnumber the trappers by huge margins, and the placement of traps on or near trails is wrong. Good trappers don't do this, but the annual toll of dead dogs proves that all trappers are not good trappers.

Proposals 216-219. Support. Increased authority to Alaska wildlife troopers. We support the efforts of the Alaska Wildlife Troopers to do their job. The proximity of Chugach State Park to Anchorage makes law enforcement especially important here.

Very truly yours,



Kneeland Taylor
Board Member
Friends of Chugach State Park



March 11, 2011

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

Dear Game Board:

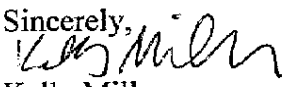
I write in support of Proposal 177-5 AAC 92.550 to close the Portage Valley floor south of Portage Creek to trapping. I live in Portage and have not used the trails in Portage for a couple of years now, because of the safety concern for my children.

I do not currently own a dog but about 10 years ago I did have a dog and she was caught in a conibear trap set less than 100 feet from a Forest Service Public use cabin. It was a very traumatic experience and had I not been with someone who knew how to work traps, I would not have gotten the dog out. As it was, she barely survived. I never stayed at that cabin again.

I think most trappers are conscientious of setting traps in areas with little or no recreational use, but there are a few trappers who go for convenience and want an easily accessible place to set traps. This is where Portage Valley falls under. Only a few trappers use the area and from watching vehicles, I have seen the same trucks in the same areas mostly on weekends. I have seen traps set right along the side of the trail and only a few feet from turnouts. The handful of recreational trappers have impacted, I would estimate, hundreds of recreational users. When friends with dogs want to go for a cross country ski, or walk, we talk about going to Portage, but because of the trapping risk, we load up and drive to another area where we can recreate without the fear of losing a dog or child. Again, I currently do not own a dog, but I have small children who like to explore and get into anything, like small children do. I do not feel safe taking my children on walks in Portage Valley because of trapping being allowed. It's a shame too, because it's right in my backyard and such a beautiful place I would like to have them experience.

Banning trapping in Portage Valley is the best alternative. Many other places valleys nearby are still open for trapping. With the topography of the valley, I think it is best to ban it all together rather than implement a buffer system. With so many other accessible areas open to trapping, let's close at least one, for the majority of people who would like to recreate without the fear of traps in Portage Valley.

Thank you for your consideration.

Sincerely,

Kelly Miller
PO Box 936
Mile 79 Seward Hwy.
Portage, AK 99587





IN REPLY REFER TO:

110152ajl

United States Department of the Interior

KENAI NATIONAL WILDLIFE REFUGE

P.O. Box 2139
Soldotna, Alaska 99669-2139
(907) 262-7021

March 10, 2011

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

Dear Chairman Judkins:

The Kenai National Wildlife Refuge (Kenai NWR or Refuge) thanks the Alaska Board of Game (BOG) for this opportunity to comment on proposals to be considered during its March 26-30, 2011 session for the Southcentral Region. The Refuge is also appreciative of the Alaska Department of Fish and Game's (ADFG) support in providing us information germane to the proposals, and for the opportunity to coordinate with ADFG staff as we reviewed proposals. Additional coordination is scheduled ahead of the BOG meeting, and we may have updated information at the meeting. We have arranged our comments by species, followed by comments on proposals involving predator control and use of artificial light.

Beaver

The Refuge is opposed to **Proposal 149**, as it applies to Refuge lands, which would change the opening date of beaver trapping in Units 7 and 15 from November 10 to October 10 to allow for open water trapping. The status of beaver populations on the Refuge has been indexed since the 1980s through aerial surveys which count active beaver lodges. Historically, beaver densities in lake and stream habitats in the Subunit 15A portion of the Refuge have been low relative to reported densities elsewhere, and recent surveys indicate that this remains the case. Surveys in 2007 and 2009 documented similar numbers of active lodges to those observed in the 1990s. No new quality beaver habitat has been created on the Kenai Lowlands in Subunit 15A since a large wildfire in 1969. Allowing open water beaver trapping during fall could result in non-target take of other species including otter, muskrat, and mink, species for whom trapping seasons would be closed until November 10.

Black Bear

The Refuge supports **Proposal 151**, which would increase the annual black bear bag limit from 2 to 3, as amended to include the recommendations of the ADFG found in the Department's *Preliminary Recommendations, Board of Game Proposals, March 2011 – Region II*. We believe



that any increased harvest and/or public use levels on the Kenai NWR under this proposal would remain at levels consistent with meeting the Refuge's legal mandates.

The Refuge opposes **Proposal 187**, which would establish a bag limit of 10 black bears in Region II with traditional trapping being limited to the use of "bucket snares, bow and arrow, muzzle loader, or spear with a season in each area to correspond with the hunting season for black bear." We believe that additional harvest under this proposal and the use of bucket foot snares would not be consistent with meeting the refuge's legal mandates. Specific to the use of bucket snares for trapping black bears on Kenai NWR, issues of concern for the Refuge include the high potential for impacting public safety and for non-target take (particularly of brown bears and of both black bear and brown bear cubs).

As they apply to Units 7 and 15, the Kenai NWR opposes **Proposal 196**, which would eliminate the sealing requirement for black bears in those areas of Regions II and IV that require submission of harvest tickets. We support the ADFG's recommendation that sealing requirements remain in place as sealing provides important data for management of this species.

Brown Bear

The Kenai NWR supports the ADFG's recommendations on **Proposals 152 and 153**. We support maintaining the ADFG's current management guidelines which use a level of 10 adult female mortalities from the combination of hunting and non-hunting human causes as a basis for managing the drawing permit hunts for brown bears on the Kenai Peninsula.

Coyote

The Kenai NWR opposes **Proposals 155, 188, 189**. Current hunting seasons for coyotes in Units 7 and 15 (August 10 – May 25) and bag limits (10 per day) afford the public ample harvest opportunity. The Refuge recommends no change to current hunting regulations, and maintaining the classification of this species as a furbearer.

Moose

The Kenai NWR supports **Proposal 164**.

The Refuge concurs that bull:cow ratios in Unit 15 represent a conservation concern, and that moose populations have declined concurrent with forest succession in Subunit 15A. We are requesting that the BOG consider an alternative to the ADFG's current recommendation for a harvest management strategy for moose in *Preliminary Recommendations, Board of Game Proposals, March 2011 – Region II*. We recommend that the ADFG's original Proposal 164, which maintained spike bulls and dropped forked bulls from the legal harvest, be adopted as an interim strategy for Unit 15. From 1998 to 2009, forked-antlered bulls made up about 33% of the overall harvest in Subunit 15A (average annual harvest of 44 forked bulls) and about 40% of the harvest in Subunit 15C (average annual harvest of 93 forked bulls). Eliminating forked bulls from the legal harvest could generate a substantial contribution towards improving bull:cow ratios in Unit 15.



Our recommendation is based on a concern that a harvest strategy that focuses entirely on the larger bulls with 50+” and/or 3+ brow tine antler configuration, as proposed under Proposals 158, 166 and 169, would overly select against larger antlered bulls. Especially if kept in place long-term, this strategy has the potential to reduce both the frequency of desirable phenotypes and productivity of the moose population (for example, if bulls reaching 50” or 3 brow tines earlier represent desired breeders). As compared to eliminating both spike and forked bulls from the legal harvest, the harvest management strategy under Proposal 164 would reduce harvest pressure on the larger bulls while providing a higher (but sustainable) level of harvest opportunity.

The Kenai NWR also provides the following general comments on **Proposals 163 and 174**:

Proposal 163, submitted by the ADFG, proposes to modify the State of Alaska’s “Intensive Management” moose population and harvest objectives for Subunit 15A. In general, the Refuge supports the concept of aligning moose population and harvest objectives more closely with habitat carrying capacity. Large landscape fires in 1947 and 1969 were the major drivers of moose populations on the Kenai Lowlands during the last 50 years, and as is to be expected, carrying capacity for moose has declined with ongoing forest succession.

Proposal 174, also submitted by the ADFG, proposes a habitat-based “Intensive Management Plan” for Subunit 15A.

The Refuge concurs with the ADFG that habitat quantity and quality, especially wintering habitat, are likely limiting the Subunit 15A moose population. Wildfires and spruce bark beetle outbreaks will continue to be the major components of the natural disturbance regime affecting forest succession on the Kenai Peninsula. Fire as a natural agent of habitat change will continue to play a role on the Kenai Lowlands in Subunit 15A, and will continue to be a major driver of moose population dynamics. The likelihood of wildfires occurring in Subunit 15A is increasing as forest succession proceeds and as forests approach their mean fire return interval. We expect the occurrence of wildfires will be influenced by a changing climate. For example, predicted trends of warming and drying and more frequent lightning events for the Kenai Peninsula would likely increase fire frequency and intensity over the long-term. Under these circumstances, we believe that implementing strategies which increase opportunities to safely manage wildfires for ecological benefits represents the approach most likely to be successful in creating early seral habitats at a scale sufficient to substantially benefit moose populations in Subunit 15A and the remainder of the Unit 15.

Since 1994, 15 large wildfires have burned more than 156,000 acres within Unit 15, almost exclusively in Subunit 15B (33, 669 acres) and Subunit 15C (116,000 acres). At least 7 of these fires were natural (lightning) starts. An expanding wildland-urban interface on the Kenai Peninsula and the conversion of spruce forests to Canada bluejoint grasslands following spruce bark beetle outbreaks (which has occurred extensively on the southern Peninsula) poses significant challenges to fire and land managers. Despite these mounting challenges, the Fish and Wildlife Service and its interagency fire management partners have allowed 4 of these wildfires to burn during the last decade on the Refuge, totaling over 42,000 acres. These wildfires were successfully managed to provide ecological benefits (including improved habitat



for moose) while ensuring that firefighter and public safety, private property, and other values at risk were protected. The Refuge recognizes the need to proactively expand efforts which will enhance our ability to safely manage future wildfires for ecological benefits while protecting public and private values at risk. This will require building upon ongoing collaborative interagency efforts such as those by the Kenai Peninsula All Lands-All Hands Group to decrease risks posed by wildfires. Specifically, we must expand efforts to plan and implement strategically located hazardous fuels reduction projects using both prescribed fire and mechanical treatments, expand the FireWise program for private property owners, and acquire information and develop analytical tools which improve decision making and our ability to manage wildfires safely and cost effectively. As part of this approach, the Refuge will continue to implement small-scale projects which have the dual benefits of enhancing habitat for moose while protecting nearby communities. The Refuge would welcome the ADFG's participation in and the BOG's support of these interagency and Refuge efforts.

Wolves

The Kenai NWR opposes **Proposals 171 and 226** which would increase the hunting annual bag limit for wolves on those portions of Units 7 and 15 within the Kenai NWR. At present, there is very little up-to-date quantitative data on current wolf population status on the Kenai Peninsula. The current regulation was jointly submitted by the ADFG and the Service and has been in place since the 1992-93 hunting season. The regulation is straightforward and to our knowledge has not generated confusion among hunters. The public is afforded ample opportunity for taking wolves on the Kenai NWR under current hunting and trapping regulations.

Predator Control

The Kenai NWR opposes **Proposals 153, 172, 173, 186 and 197**, all of which include provisions for predator control in multiple units which include lands within the Kenai NWR. Proposal 153 would modify the harvest objective for brown bear under intensive management to "harvest 100 or more brown bears" in Subunit 15C. Proposal 172 would allow aerial taking of wolves in Unit 15. Proposal 173 would implement a predator management plan in Subunit 15A for black bears and wolves. Proposals 186 and 197 would allow the same-day airborne hunting of black bears at bait stations Regions II and or IV, which is currently allowed elsewhere in Alaska only in designated "predation control areas."

The Fish and Wildlife Service is legally precluded from managing national wildlife refuges with a singular focus to reduce predator populations to benefit human harvest of a prey species. Lands within the Kenai NWR comprise approximately 65 percent of lands within Unit 15, including approximately 80 percent of lands in Subunit 15A. Legally mandated Refuge purposes to conserve fish, wildlife and habitats in their natural diversity, protect Wilderness character, and provide wildlife-oriented recreational opportunities, and the Service's mandate to provide subsistence opportunities on national wildlife refuges in Alaska must all be considered as we develop management objectives and strategies for moose and other wildlife on the Kenai NWR. In consideration of this broad range of mandates, the Service addressed predator control in the Kenai NWR's revised Comprehensive Conservation Plan (November 2009).

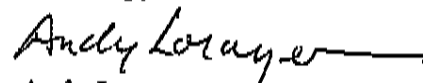
Legal Methods Exceptions - Artificial Light



As they apply to refuge lands, the Kenai NWR opposes **Proposals 175 and 176**, which would allow the use of artificial light to hunt predators in Units 7 and/or 15. Use of artificial light to take any animal on national wildlife refuges is prohibited by federal regulation 50 CFR 27.73, which reads: *"No unauthorized person shall use or direct the rays of a spotlight or other artificial light, or automotive headlights for the purpose of spotting, locating, or taking any animal within the boundaries of any national wildlife refuge or along rights-of-way for public or private roads within a national wildlife refuge."*

Thank you for your time to review our comments on these important issues. The Refuge remains committed to cooperation and coordination with the ADFG and other State and federal agencies, and to full public involvement, as we move forward with our shared management responsibilities on the Kenai Peninsula.

Sincerely,



Andy Loranger
Refuge Manager

cc: Geoffrey Haskett, Regional Director, Alaska Region
Todd Logan, Regional Chief, NWRS, Alaska Region



Patricia J. O'Brien
PO Box 35451
Juneau, Alaska 99803-5451
(907) 789-9405
patriciaobrien@gci.net
February 18, 2011

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

Dear Members of the Board of Game,

Thank you for your time in reviewing my comments. After reviewing several proposals and the statewide policies at the end of the proposal book I have two suggestions, not on specific proposals, but on the regulatory process used. I respectfully request you consider these recommendations.

1. I respectfully suggest that the Board of Game carefully consider revising the format used for submitting proposals. It is designed to be inviting, but fails to request any evidence for assertions. It also fails to consider benefits and suffering for any but the hunter. I hunted as a young woman and suffer now from reading some of these proposals. I do not object to hunting for food. But no consideration is given to concerns about sustainability for all wildlife, including predators, for watching, for tourism, and for future generations to enjoy. The questions also fail to consider the broader environmental impact of a proposal. Please consider updating the format.
2. The Management Policies at the end of the proposal book were included in the public notice for the first of two hearings to be held on this proposal book, but not in the public notice for the second hearing. I found it confusing as I am sure others did as well, especially when only the first of the findings is noted in the Table of Contents. Further the policies meet the definition of a regulation and should be reviewed by the Department of Law to avoid due process issues.

Sincerely,



Patricia O'Brien



March 10, 2011

Board of Game Comments

Alaska Department of Fish and Game Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Dear Game Board:

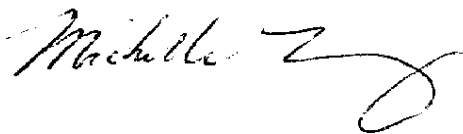
I write in support of Proposal 177-5 AAC 92.550 to close the Portage Valley floor south of Portage Creek to trapping. I live in Girdwood would like to use the Portage Creek drainage in the winter with my dog, but I am afraid to take him there, for fear of traps.

The Portage Creek valley floor is an urban space with a visitor center, Class 4 and 5 trails, and easy road access to the entire area. There is no reason to support a few recreational, roadside trappers in this space when there are other nearby valleys that are seldom visited. Dogs, children, and adults use the Portage area for cross-country skiing, rescue dog training, and walking. There have been instances of dogs getting caught in lethal traps; it is only a matter of time before a dog dies or a person gets hurt.

There is no alternative other than to ban traps in this valley, especially when there are alternative valleys in which to trap. Trappers can go to the Placer Creek drainage or the Twenty-Mile River drainage. And if signs are posted where traps are located, those traps most likely will be sprung or removed. Banning is the best alternative.

A great deal of money was spent to put in The Trail of Blue Ice, but this area has had traps placed dangerously close to the trail. I want to use this wonderful trail, but I will not take my dog. What a shame.

Sincerely,



Michelle Tenny

PO Box 1398

Girdwood, AK 99587





THE ALASKA WILDLIFE ALLIANCE

"LETTING NATURE RUN WILD"

March 11, 2011

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

Re: Spring Meeting, Southcentral Region: 2011.

Dear Board Members:

The Alaska Wildlife Alliance is an Alaska based membership organization interested in Alaska's wildlife. All members of our Board of Directors are residents of Alaska. We were first organized approximately thirty years ago. We are focused on the intrinsic values of Alaska's wildlife, and routinely submit comments to the Board of Game. Please consider the following at your Spring, 2011 Southcentral Region meeting.

First, we want to say that we support and agree with the comments submitted by Defenders for Wildlife. Having said that, we want to provide comments of our own.

Proposal 128. Support. Close Wolverine Trapping in Units 6 & 14C.
The wolverine survey conducted in 2008-09, and testimony provided by area biologists at the 2009 Spring Meeting, made clear that continued wolverine



Board of Game
March 26-30-2011 Meeting
Page 2 of 8

trapping in the Twenty-mile drainage, and in that portion of Unit 6 lying west of College Fiords posed a threat to viability of the wolverine populations in this part of the State. Notwithstanding the undisputed evidence, the Board of Game allowed wolverine trapping to continue in the Twenty-mile drainage as part of politically motivated, face-saving, compromise. It is time to put the wildlife first. Face-saving and politics should not be paramount.

Proposal 130-132. Oppose. Increased Bag Limits for Black and Brown Bear hunting. These proposals would increase the bag limits for black and brown bear in Unit 14C. Anchorage is a large city with most of its citizens in favor of “watchable wildlife”. Of course, problem bears should be removed, but these proposals are aimed only at the interests of a handful of hunters, and ignore the wishes of the vast majority of Anchorage residents.

Proposal 133. Oppose Partially. Dall Sheep in 14C. We do not support full curl only restrictions because they undoubtedly have a negative impact on the gene pool of populations, and because the taking of only the largest animals has negative impacts on population dynamics. Dall sheep should be managed for the health of the population. It seems obvious that if only full curl sheep are taken by hunters, that Darwinian natural selection will favor small animals. Furthermore, dynamics within sheep populations will be disrupted. The first priority of management should not be income for the department, favors to residents, or favors to guides by crafting regulations that allow lots of people to go hunting but minimize the chances of success by allowing hunters to take only a few full curl animals.

Proposal 135. Oppose. Registration Hunt for Goat in 14C. This proposal would open the door to a free-for-all hunt for goat in Chugach State Park, and nearby areas, that might have drastic results. Hunting in Chugach State Park for goat is reputedly very favored because it is carefully managed. The floodgates should not be opened.

Proposal 136. Oppose. More goat hunting in Unit 14C. This proposal is unclear, but we support careful, micro-management of hunting in Chugach State Park and throughout Unit 14C, and this proposal seems aimed at loosening



Board of Game
March 26-30-2011 Meeting
Page 3 of 8

controls.

Proposal 137. Oppose. Increase Moose Hunting Harvest Objectives.

This proposal would increase the harvest objective for moose for the Anchorage Bowl from 110 to more than 210 annually. Our members and the majority of Anchorage residents like our moose, and oppose increased moose hunting in Anchorage and surrounding areas.

Proposal 140. Oppose. Wolf hunting throughout Unit 14C. This proposal would authorize wolf hunting and trapping throughout Unit 14C, including in Chugach State Park where wolf trapping has been banned since the early 1970's. The justification is one or two incidents with wolves acting too friendly toward people at Fort Richardson. We support reasonable measures aimed at public safety, but opening up all of Unit 14C to wolf hunting and trapping is unreasonable, and will effectively eliminate wolves in this part of the state. We find it hypocritical that wolves are eliminated in some parts of Alaska because there are allegedly too few moose, while here in Anchorage where there allegedly too many moose, the same people advocate killing all the wolves.

Proposal 150. Oppose. Increased seasons and bag limits for black and brown bear. This proposal, if adopted, would allow a hunter to take five black bears every year in Units 7 and 15. The listed justification for this proposal is that black bears are preying excessively on moose on the Kenai Peninsula.

There is no evidence justifying adoption of this proposal.

Proposal 151. Oppose. Increased seasons and bag limits for black bear. This proposal if adopted would allow a hunter to take three black bears every year in Units 7 and 15.

The listed justification for this proposal is that there is an increasing number of bears in Units 7 and 15 and bears are preying excessively on moose. Increasing the bag limit is projected to increase the bear harvest, decrease predation on moose and increase the harvest of moose by hunters. There is no evidence or data presented to substantiate these claims.



Board of Game
March 26-30-2011 Meeting
Page 4 of 8

Until field studies confirm that predation is limiting moose on the Kenai Peninsula, the BOG should not attempt to further reduce predator numbers.

We join with Defenders of Wildlife in asking that before adopting proposals such as this, the Department determine if there is a basis, and that the Department pay attention to things such as poaching, weather, and road kill.

Proposal 152. Oppose. This proposal, if adopted, would increase the number of hunting tags for brown bears in Unit 15.

The justification for this proposal is that there are too many brown bears in Unit 15C and that increasing the number of tags issued would result in more bears being taken and a reduced risk of human injuries due to bears.

We support the continued application of bear harvest quotas as provided by the cooperative joint state-federal Kenai Peninsula Brown Bear Management Plan, and oppose measures to change the plan's harvest guidelines which have been applied successfully in recent years.

Proposal 153. Oppose. This proposal, if adopted, would provide for an annual harvest objective of 100 brown bears in Unit 15C.

The listed justification for this proposal is that there is a high number of brown bears in Unit 15C and bears are preying excessively on moose. There is no evidence or data presented to substantiate any of these claims.

Proposal 154. Oppose. This proposal, if adopted, would increase the brown bear harvest quota in Unit 15.

Proposal 155. Oppose. Unlimited coyote hunting and trapping. See our comments regarding Proposals 188, 189, and 198.

Proposal 163. Support. Lower moose harvest objectives Unit 15A. We are pleased to see the Department supporting more realistic harvest goals, and



Board of Game
March 26-30-2011 Meeting
Page 5 of 8

hope the Department will review these statewide on a repeated basis.

Proposal 169. Oppose. More pressure on largest bull moose. Among other problems, this proposal would put more pressure on the largest and oldest bull moose. That pressure undoubtedly has a negative impact on the gene pool and population dynamics. Conservation of our wildlife should come first, and not hunter opportunity, which is increased by allowing more people to hunt for fewer "rare" animals.

Proposal 172. Oppose. Aerial wolf hunting. This proposal if adopted would authorize aerial hunting by anyone with the resources to own or hire a small plane to fly around shooting at wolves. That practice is already prohibited by Federal law.

We note that we at the AWA think that aerial hunting is beneath the dignity of Alaska and its hunters.

Proposal 173. Oppose. Predation control implementation. We join with Defenders of Wildlife in noting that much of the land covered by the proposal is managed by the U.S. Fish and Wildlife Service and that Alaska's predator control programs are in conflict with the Federal management objectives. We support the Federal management goals, and hope that the State will cease its attempts to expand its ill-conceived predator control programs into federally managed lands.

Proposal 174. Oppose. Habitat based intensive management. We support natural wildlife populations and think that radical modification of habitat with large scale burning of forests is environmentally damaging, as well as wasteful. We wonder if there is any responsible information regarding the impact of such programs on song birds, etc.

Proposal 175 and 176. Oppose. Hunting with night lights. The AWA opposes radical, unethical, proposals such as these which would allow the use of artificial light in hunting black bears, wolves and coyotes. We like wildlife.

Proposal 177. Support. Close Portage Creek Valley to Trapping. This



Board of Game
March 26-30-2011 Meeting
Page 6 of 8

proposal would close the Portage Creek Valley to trapping. This area is visited throughout the year by people who hike, ice skate, skijor and enjoy themselves outdoors. Many take their dogs. By allowing trapping, the area is effectively closed to those who hike, ski, and skate with their dogs; resulting in a gross misallocation of publicly owned resources. The Board of Game should show respect for those of us who do not trap, and recognize that it is unreasonable to have trapping on the outskirts of a large city, especially in areas heavily used by walkers, hikers, skiers, etc.

Proposal 186 and 197. Oppose. Same day airborne hunting at bear baiting stations. We have supported three initiatives opposed to same day airborne hunting. As a practical matter hunters hunt from their airplanes.

Proposal 187. Oppose. Trapping Black Bear in Region II. This proposal would allow black bear trapping throughout Southcentral Alaska. We oppose it and so do most Alaskans because trapping bears is cruel, unethical and beneath the standards of most Alaskans.

Proposals 188-189. Oppose. Coyote Hunting and Trapping. These proposals would apparently authorize unlimited coyote hunting and trapping throughout Southcentral Alaska with no restrictions. We strongly oppose this.

The existing bag limit of 10 coyotes per day is already too high. Coyotes are not vermin. They are a naturally occurring species and we like Alaska's wildlife.

Proposal 191. Oppose. Discretionary Conditions for Permit Hunts. This proposal by the Board of Game would remove the Department's discretion to attach conditions to permits. We support the Department's discretion to attach conditions, and encourage hands-on management of hunting and trapping, especially in areas near large population centers, areas heavily used by non-consumptive users, and conservation areas.

Proposal 192. Support. No Traps on Roads and Trails. This proposal would prohibit traps within 50 feet of trails and roads. The trapping of pet dogs on trails, or within one or two yards of trails, should be banned. It is appalling,



Board of Game
March 26-30-2011 Meeting
Page 7 of 8

and a sign of a broken system, that the Board of Game has rejected almost all efforts to responsibly manage trapping on trails for more than a decade.

Proposal 193. No Position, but want proper attention focused.

Proposal 193 by Sea Ducks Unlimited is lengthy and covers several species. We at the Alaska Wildlife Alliance profess no expertise. But we have heard horror stories of halibut charter boats wiping out large numbers of sea ducks for no good reason in areas near Homer, where these waterfowl are treasured by local residents. We support greater focus on these issues, with less attention to the desires of a few trophy-seekers and commercial operators, and more attention to those of us who appreciate wildlife for reasons other than meat and trophies.

Proposal 194. Support. Sea Ducks and Waterfowl. See above.

Proposal 198. Oppose. See Proposals 188-189 above.

Proposals 216-220. Support. Increased power to wildlife troopers.

These proposals by the Alaska Wildlife Troopers would give them tools to enforce our laws, and we support their efforts to enforce the laws and regulations that give some protection to our wildlife from the misconduct of people who think that conservation is for the other guy.

Proposal 224. Oppose. Increased bag limit for black bears in Units 7 & 15. See our comments above.

Proposal 226. Oppose. Hunting wolves with snow machines. The AWA opposes slob hunting practices such as chasing animals with snow machines.

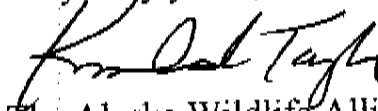
The wolf and bear management policy statements. The AWA has previously submitted comments. We repeat our objections to policy statements that appear to circumvent the regulatory process, and applicable law. We also repeat our view that Alaskans value wildlife for many reasons in addition to hunting and trapping opportunity. The policies of the ADF&G, including those contained in the proposal book, are aimed at satisfying only one segment of Alaska's population, and lead to management that many Alaskans find



Board of Game
March 26-30-2011 Meeting
Page 8 of 8

objectionable. We also note that the environmental impact of radical manipulation of wildlife populations is poorly understood, and has been given insufficient attention by the Department for a long time.

Very truly yours,



The Alaska Wildlife Alliance
By Kneeland Taylor, Board Member





Alaska Office

333 West 4th Avenue, #302 | Anchorage, AK 99501 | tel 907.276.9453 | fax 907.276.9454
www.defenders.org

March 11, 2011

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

To Whom It May Concern:

Defenders of Wildlife, The Alaska Center for the Environment and The Alaska Wildlife Alliance appreciate the opportunity to submit these written comments on proposals that will be considered at the March, 26th – 30th, 2011 Board of Game (BOG) meeting in Anchorage, Alaska.

Established in 1947, Defenders of Wildlife (Defenders) is a non-profit membership based organization dedicated to the protection of all native wild animals and plants in their natural communities. Defenders focuses on the accelerating rate of species extinction and associated loss of biological diversity and habitat alteration and destruction. Defenders also advocates for new approaches to wildlife conservation that will help prevent species from becoming endangered. We have field offices around the country, including in Alaska where we work on issues affecting wolves, black bears, brown bears, wolverines, Cook Inlet beluga whales, sea otters, polar bears and impacts from climate change. Our Alaska program seeks to increase recognition of the importance of, and need for the protection of, entire ecosystems and interconnected habitats while recognizing the role that predators play as indicator species for ecosystem health. Defenders represents more than 3,000 members and supporters in Alaska and more than one million nationwide.

The Alaska Center for the Environment (ACE) is a non-profit environmental education and advocacy organization, whose mission is to enhance Alaskans' quality of life by protecting wild places, fostering sustainable communities and promoting recreational opportunities. ACE advocates for sustainable policy on behalf of over 6,000 Alaskan members.

Founded in 1978, the Alaska Wildlife Alliance (AWA) is the only group in Alaska solely dedicated to the protection of Alaska's wildlife. Our mission is the

National Headquarters

1130 17th Street, N.W.
Washington, D.C. 20036-4604
tel 202.682.9400 | fax 202.682.1331



protection of Alaska's natural wildlife for its intrinsic value as well as for the benefit of present and future generations. AWA is your voice for promoting an ecosystem approach to wildlife management that represents the non-consumptive values of wildlife. AWA was founded by Alaskans and depends on the grassroots support and activism of its members.

COMMENTS ON THE ALASKA BOARD OF GAME PROPOSALS

Proposal 130. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would provide an annual bag limit of 3 black bears in Unit 14C.

This proposal advocates raising the black bear bag limit - and potentially increasing the harvest - absent supporting data on changes in bear numbers or density. The sole justification is to provide more hunting opportunity; however, it has not been demonstrated that this bear population can support increased hunting. Bears in Unit 14C are affected by increasing loss of habitat and habitat encroachment by humans that exclude bears from areas where they previously thrived. Increasing harvest of such populations absent population data is not sound management.

Proposal 131. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would increase the black bear bag limit to 3 with no closed season in the “remainder” of Unit 14C.

The justification for this proposal is that bears in Unit 14C are preying excessively on ungulates. Increasing the bag limit is projected to increase the bear harvest, decrease predation on moose and sheep and increase the harvest of ungulates by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on field data identifying limiting factors for ungulate populations that include other variables besides bear predation such as poor habitat, heavy hunting and poaching, severe winters and wolf predation, all of which have been shown to contribute to limiting ungulate populations in other areas. Bear predation may or may not be an important limiting factor, but there is no way of knowing absent valid field studies. We suggest that if the sponsor of this proposal suspects bear predation is limiting ungulate numbers in Unit 14C, they request the BOG to direct the Alaska Department of Fish and Game (ADF&G) to undertake field studies to evaluate the nature and extent of bear predation in relation to other limiting factors.



Proposal 132. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would increase the harvest objective for black and brown bears in the Anchorage Bowl, Unit 14C.

The justification for this proposal is that bears in the Anchorage Bowl are too tolerant of humans and this creates a public safety risk that could be reduced by hunting bears more intensively.

The proponent of this proposal provides no data to support the claim that increased hunting of bears would reduce the tolerance of bears for people and reduce the risk of bears injuring humans. While we share concern over public safety and human wildlife conflict, there is no evidence that conflict is increasing – on the contrary, increased public education of bear safety practices has measurably reduced conflict in recent years.

We therefore support the continued efforts of ADF&G staff and the Anchorage Bear Committee to educate the public about how to reduce attractants including proper food and trash storage and the efforts by ADF&G to close trails near salmon streams during spawning season to avoid bear-human conflicts. Bear-human conflicts should be handled on a case-by-case basis as has successfully been done in recent years. Broad-scale efforts to increase hunting are unacceptable in an urban environment.

Increased hunting in areas within the city limits of Anchorage and in Chugach State Park is incompatible with other uses, raises public safety concerns and is opposed by many residents.

Proposal 140. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would increase the bag limit of wolves to 2 per day with no closed season in all of Unit 14C.

The justification for this proposal is that wolves in the Anchorage Bowl are too tolerant of humans and this creates a public safety risk that could be reduced by hunting wolves more intensively.

Despite these claims, there are no data available indicating that increased hunting would decrease the number of wolves in the Anchorage Bowl and therefore decrease risks to humans. Nor are there data indicating that increased hunting of wolves would reduce the tolerance of wolves for people and thus reduce the risk of wolves injuring humans.



Increased hunting in areas within the city limits of Anchorage and in Chugach State Park is incompatible with other uses and is opposed by many residents. Wolf-human conflicts should be handled on a case-by-case basis as has successfully been done in recent years. Broad-scale efforts to increase hunting are unacceptable in an urban environment.

We suggest that expanded public education efforts teaching proper human behavior in the presence of wolves and proper handling of dogs when traveling or living in wolf country is a better and more cost effective alternative than broad-scale efforts to increase hunting near the city. Research has shown that a strong majority of Anchorage residents take pride in the city's wildlife and feel that people should be willing to accept some conflict if they want to live here.¹

Proposal 150. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would allow a hunter to take five black bears every year in Units 7 and 15.

The listed justification for this proposal is that black bears are preying excessively on moose on the Kenai Peninsula. Increasing the bag limit is projected to increase the bear harvest, decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on valid field data identifying limiting factors for ungulate populations that include other variables besides bear predation such as poor habitat, heavy hunting and poaching, severe winters and wolf predation, all of which have been shown to contribute to limiting ungulate populations in other areas. Bear predation may or may not be an important limiting factor, but this cannot be determined absent field studies.

There is no recent biological information indicating excessively heavy predation on moose in Units 7 and 15, nor is there any reason to believe that reducing predators will result in more moose 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 predators have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result.

¹ Alaska Department of Fish and Game. 1999. Living with Wildlife in Anchorage: A Cooperative Planning Effort. Chapter 4: Wildlife in Anchorage
<http://www.adfg.alaska.gov/index.cfm?adfg=anchorageplanning.anchorage5#values>



Until field studies confirm that predation is limiting moose on the Kenai Peninsula, the BOG should not attempt to further reduce predator numbers.

We suggest that if the sponsor of this proposal suspects bear predation is limiting moose numbers in Units 7 and 15, he should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of bear predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality to moose on the peninsula they should consider such sources and ask that the BOG direct the ADF&G work with the DOT (DOT) to decrease road mortality of moose.

Proposal 151. We *oppose* this proposal and urge the BOG to reject it.

This proposal if adopted would allow a hunter to take 3 black bears every year in Units 7 and 15.

The listed justification for this proposal is that there is an increasing number of bears in Units 7 and 15 and bears are preying excessively on moose. Increasing the bag limit is projected to increase the bear harvest, decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on valid field data identifying limiting factors for ungulate populations that include other variables besides bear predation such as poor habitat, heavy hunting and poaching, severe winters and wolf predation, all of which have been shown to contribute to limiting ungulate populations in other areas. Bear predation may or may not be an important limiting factor, but there is no way of knowing absent field studies.

There is no recent biological information indicating excessively heavy predation on moose in Units 7 and 15, nor is there any reason to believe that reducing predators will result in more moose 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 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 BOG should not attempt to further reduce predator numbers.

We suggest that if the sponsor of this proposal suspects bear predation is limiting moose numbers in Unit 7 and 15, it should request the BOG to direct the Department to undertake field studies to evaluate the nature and extent of bear



predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 152. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would increase the number of hunting tags for brown bears in Unit 15.

The justification for this proposal is that there are too many brown bears in Unit 15C and that increasing the number of tags issued would result in more bears being taken and a reduced risk of human injuries due to bears.

We support the continued application of bear harvest quotas as provided by the cooperative joint state-federal Kenai Peninsula Brown Bear Management Plan, and oppose measures to change the plan's harvest guidelines which have been applied successfully in recent years.

Proposal 153. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would provide for an annual harvest objective of 100 brown bears in Unit 15C.

The listed justification for this proposal is that there is a high number of brown bears in Unit 15C and bears are preying excessively on moose. Increasing the harvest objective is projected to increase the bear harvest, decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on valid field data identifying limiting factors for ungulate populations that include other variables besides bear predation such as poor habitat, heavy hunting and poaching, severe winters and wolf predation, all of which have been shown to contribute to limiting ungulate populations in other areas. Bear predation may or may not be an important limiting factor too, but there is no way of knowing absent field studies.

There is no recent biological information indicating excessively heavy predation on moose in Unit 15C, nor is there any reason to believe that reducing predators will result in more moose for hunters. Further, the most recent (2001) population estimate for the Kenai brown bears is 250-300 animals. Based on this estimate, a



harvest objective of 100 bears per year would result in a 30-40% harvest rate – which far exceeds the 6% sustainable human mortality rate for 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 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 BOG should not attempt to further reduce predator numbers.

We suggest that if the sponsor of this proposal suspects bear predation is limiting moose numbers in Unit 15C, they should request the BOG to direct the Department to undertake field studies to evaluate the nature and extent of bear predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 154. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would increase the brown bear harvest quota in Unit 15.

The suggested justification for this proposal is that brown bears in Unit 15 are preying excessively on moose. Increasing the harvest quota is projected to increase the bear harvest, decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on field data identifying limiting factors for ungulate populations that include other variables besides bear predation such as poor habitat, heavy hunting and poaching, severe winters and wolf predation, all of which have been shown to contribute to limiting ungulate populations in other areas. Bear predation may or may not be an important limiting factor too, but there is no way of knowing absent field studies.

We support the continued application of bear harvest quotas as provided by the cooperative joint state-federal Kenai Peninsula Brown Bear Management Plan, and oppose measures to change the plan’s harvest guidelines which have been applied successfully in recent years.



We suggest that if the sponsor of this proposal suspects brown bear predation is limiting moose numbers in Unit 15, he should request the BOG to direct the Department to undertake field studies to evaluate the nature and extent of bear predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 155. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would provide an unlimited bag limit with no closed season on coyotes in Units 7 and 15.

The justification for this proposal states that coyote predation on newborn moose calves is high. No studies anywhere in Alaska have ever documented that coyote predation on moose calves is sufficient to limit moose numbers or to affect human harvests of moose.

This proposal and several others like it raise the issue of *de facto* predator control. While coyotes are targeted in this proposal much *de facto* control, including lengthening seasons and raising bag limits, has been directed at wolves. We have commented extensively on these types of control measures which are designed to reduce predators over much of Alaska. These incremental measures are not part of a scientifically-sound formal predator control program and virtually always lack field study data indicating that the target predator population in the affected areas strongly limit ungulate numbers. Nor do these measures require the public review that the formal predator control program would need to be implemented. Therefore, we urge the BOG to reject proposals for *de facto* predator control on all target species, including wolves, bears and coyotes.

Proposal 163. We *support* this proposal and urge the BOG to adopt it.

This proposal, if adopted, would lower the intensive management moose population and harvest objectives in Unit 15A.

When the BOG initially set intensive management population objectives for many ungulate populations across Alaska it often relied on past population estimates from times when these populations reached historically high numbers. In some cases, the historic estimates were little more than guesses, often much higher than the likely number of animals actually present. Clearly, for many ungulate populations that reached peaks in the 1950s or 1960s, census methods were crude and not based on statistical analyses. Furthermore, in most cases, the population



peaks were followed by crashes demonstrating that peak numbers were unsustainable.

Accordingly, we strongly endorse the concept of periodically re-visiting intensive management population objectives, adjusting them as necessary to provide objectives that are attainable and sustainable and incorporate the best available data on the capacity of the habitat to sustain the objective population sizes if they are met. Failure to do so creates unrealistic expectations among hunters and sets the stage for perpetual predator control to meet prey population objectives that are unlikely to ever be achieved.

We are encouraged to see that the ADF&G has provided an excellent analysis of the situation in Unit 15A and has recommended lowering the intensive management population objective for moose in light of the changes in habitat quality and the ever-increasing encroachment into moose habitat by humans on the northern Kenai Peninsula. We strongly urge the BOG to adopt this proposal and to encourage the ADF&G to re-examine intensive management population objectives in other units where initial efforts to set objectives resulted in grossly inflated numbers.

Proposal 169. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would change several of the moose hunting regulations in Units 7 and 15 and provide for an increased take of wolves and bears.

The suggested justification for this proposal is that wolves and bears in Units 7 and 15 are preying excessively on moose. Increasing the harvest of predators is projected to decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on valid field data identifying limiting factors for ungulate populations that include other variables besides predation such as poor habitat, heavy hunting and poaching, and severe winters, all of which have been shown to contribute to limiting ungulate populations in other areas. Predation may or may not be an important limiting factor, but there is no way of knowing absent field studies.

There is no recent biological information indicating excessively heavy predation on moose in Units 7 and 15, nor is there any reason to believe that reducing predators will result in more moose 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 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 BOG should not attempt to further reduce predator numbers.

We suggest that if the sponsor of this proposal suspects predation is limiting moose numbers in Units 7 and 15, he should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 172. We *oppose* this proposal and urge the BOG to reject it.

This proposal if adopted would allow aerial shooting of wolves in Unit 15.

The listed justification for this proposal is that wolves in Unit 15 are preying excessively on moose. According to the proposal, allowing aerial shooting would increase the harvest of wolves which is projected to decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on valid field data identifying limiting factors for ungulate populations that include other variables besides predation such as poor habitat, heavy hunting and poaching, severe winters and bear predation, all of which have been shown to contribute to limiting ungulate populations in other areas. Predation may or may not be an important limiting factor too, but there is no way of knowing absent field studies.

We also note that Unit 15 is poorly suited to aerial shooting of wolves due to the forested nature of much of the terrain. Wolves are very difficult to track and shoot in this area and pilots cannot land to retrieve carcasses. Allowing aerial shooting would likely be ineffective in lowering wolf numbers in this unit. Further, as the Kenai is heavily visited by a variety of recreational user groups, allowing aerial shooting of wolves would create a human safety risk and would likely result in increased conflict between user groups.

Finally, the majority of land on the Kenai Peninsula is managed by the U.S. Fish and Wildlife Service (FWS) as the Kenai National Wildlife Refuge. Alaska's intensive management programs are inconsistent with FWS policy and mandates. Thus the majority of the Kenai would be exempted from aerial control programs, decreasing any potential benefit.



We suggest that if the sponsor of this proposal suspects predation is limiting moose numbers in Unit15, they should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and also ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 173. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would change certain moose hunting regulations in Unit 15A and would aim to reduce black bears and wolves as part of an intensive management program designed to increase moose numbers for hunters.

The listed justification for this proposal is that wolves and bears in Unit 15A are preying excessively on moose. Increasing the harvest of predators is projected to decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on field data identifying limiting factors for ungulate populations that include other variables besides predation such as poor habitat, heavy hunting and poaching, and severe winters, all of which have been shown to contribute to limiting ungulate populations in other areas. Predation may or may not be an important limiting factor, but there is no way of knowing absent field studies.

We also note that the proposal recommends allowing same-day airborne and aerial shooting of wolves in Unit 15A. This unit is poorly suited to aerial shooting of wolves due to the forested nature of much of the terrain. Wolves are very difficult to track and shoot in this area and pilots cannot land to retrieve carcasses. Allowing aerial shooting would likely be ineffective in lowering wolf numbers in this unit. Further, as the Kenai is heavily visited by a variety of recreational user groups, allowing aerial shooting of wolves would create a human safety risk and would likely result in increased conflict between user groups. Finally, the majority of land on the Kenai Peninsula is managed by the U.S. Fish and Wildlife Service (FWS) as the Kenai National Wildlife Refuge. Alaska's intensive management programs are inconsistent with FWS policy and mandates. Thus the majority of the Kenai would be exempted from aerial control programs thus decreasing any potential benefit.

We suggest that if the sponsor of this proposal suspects predation is limiting moose numbers in Unit15A, they should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of predation in relation to



other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and also ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 174. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would establish a habitat-based intensive management program in Unit 15A to increase moose numbers to benefit hunters.

The proposal outlines the history of the moose population from 1947 when a large wildfire created vast areas of high-quality moose habitat and moose numbers increased greatly. By the early 1970s, forest succession greatly reduced habitat quality and moose declined sharply following a series of severe winters. From 1991 to 2008, further declines reduced the moose population from 2,931 to 1,670 animals. The intensive management population objective is 3,000-3,500, but we note that Proposal 163, if adopted, would lower this to 1,960 to 2,600.

During the late 1970s and early 1980s, a moose habitat enhancement program was conducted by state and federal agencies in this area. Large areas of black spruce forest (re-growth from the 1947 burn) were treated by crushing trees using large machines. This ended when federal management guidelines discouraged single-species management on National Wildlife Refuge lands.

Now, a state sponsored intensive management program is proposed to increase moose in Unit 15A by enhancing habitat, but details outlining where and how this would be done are absent. Reference is made to controlled burns (and the resulting smoke problems) but no specifics are provided. We note that past efforts at controlled burning in this area by both the U.S. Forest Service and the FWS were generally not effective due to unsuitable weather conditions or failure of burned areas to regenerate to high-quality moose habitat.

We also note that areas along Alaska's road system where moose populations are at high density experience a high frequency of moose-vehicle accidents with accompanying property damage, injuries and loss of life. This is the case in Fairbanks where state troopers can no longer handle the large number of road-killed moose carcasses available for charity. The Kenai Peninsula already has about 225 road-killed moose per year. Is it wise to increase moose numbers and risk additional road kills? We suggest that the BOG should direct the ADF&G to work with the DOT to devise innovative ways to minimize road kills.

Lacking specifics concerning the methods, extent, and land ownership mosaic affected by the proposed program, we cannot endorse this proposal despite the



encouraging fact that predator control for this intensive management program is not proposed at this time. We also generally cannot endorse intensive management programs on National Wildlife Refuge lands where ecosystem values, as opposed to single-species management (or management of one species at the expense of another), is the main focus.

Proposal 175. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would allow use of artificial lights at night to shoot black bears, wolves and coyotes in Units 7 and 15.

The listed justification for this proposal is that wolves, coyotes and black bears in Units 7 and 15 are preying excessively on moose. Increasing the harvest of predators is projected to decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on field data identifying limiting factors for ungulate populations that include other variables besides predation such as poor habitat, heavy hunting and poaching, and severe winters, all of which have been shown to contribute to limiting ungulate populations in other areas. Predation may or may not be an important limiting factor too, but there is no way of knowing absent field studies.

Allowing night hunting of black bears would set a dangerous precedent, potentially harmful to both hunters who might try to follow wounded bears in the dark and to others in the area who might encounter wounded bears. Night hunting of bears presents serious safety problems that should be avoided.

We suggest that if the sponsor of this proposal suspects predation is limiting moose numbers in Units 7 and 15, he should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and also ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 176. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would allow use of artificial lights at night to shoot wolves and coyotes in Units 7 and 15.



The listed justification for this proposal is that wolves and coyotes in Units 7 and 15 are preying excessively on moose. Increasing the harvest of predators is projected to decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on field data identifying limiting factors for ungulate populations that include other variables besides predation such as poor habitat, heavy hunting and poaching, and severe winters, all of which have been shown to contribute to limiting ungulate populations in other areas. Predation may or may not be an important limiting factor too, but there is no way of knowing absent field studies.

There is no recent biological information indicating excessively heavy predation on moose in Units 7 and 15, nor is there any reason to believe that reducing predators will result in more moose 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 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 BOG should not attempt to further reduce predator numbers.

We suggest that if the sponsor of this proposal suspects predation is limiting moose numbers in Units 7 and 15, he should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and also ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 186. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would allow same-day airborne hunting of black bears at bait stations in all units of Region 2.

Prohibition of same-day airborne hunting of big game animals in Alaska has been in effect for decades with certain exceptions. In recent years, exceptions have been made for hunting bears in predator control areas as a means of severely reducing bear numbers in an attempt to increase ungulates for hunters.

Individuals and fish and game advisory committees noted these exceptions and now wish to extend them over vast areas not part of predator control programs. We



urge the BOG to reject proposals like this and attempt to inform the public that fair chase standards (including prohibition of same-day airborne hunting) are still important and should be preserved.

Proposal 187. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would establish an annual trapping bag limit of 10 black bears for all units of Region 2.

We opposed the re-classification of black bears establishing them as furbearers. The re-classification was adopted to allow foot snaring of black bears in predator control areas. Now, proposals like this want to allow “trapping” over vast areas not part of control programs through the use of guns, bows and arrows, muzzle loaders, or spears in addition to foot snares.

We especially oppose the proposed bag limit of 10 bears. This is excessive and may result in over-harvesting bears locally.

Proposal 189. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would provide for no closed season and no bag limit for coyotes in all units of Region 2.

The justification for this proposal is that coyotes are preying excessively on marten, red fox, lynx and sheep and that having unlimited hunting of coyotes would relieve this predation pressure.

No studies anywhere in Alaska have ever documented that coyote predation on marten or lynx is sufficient to limit numbers of these predators or to affect human harvests of them.

This proposal and several others like it raise the issue of *de facto* predator control. While coyotes are targeted in this proposal much *de facto* control, including lengthening seasons and raising bag limits, has been directed at wolves. We have commented extensively on these types of control measures which are designed to reduce predators over much of Alaska. These incremental measures are not part of a scientifically-sound formal predator control program and virtually always lack field study data indicating that the targeted predator population in the affected areas strongly limit ungulate numbers. Nor do these measures require the public review that the formal predator control program would need to be implemented. Therefore, we urge the BOG to reject proposals for *de facto* predator control on all target species, including wolves, bears and coyotes.



Proposal 197. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would allow same-day airborne hunting of black bears at bait stations in all units of Regions 2 and 4.

Prohibition of same-day airborne hunting of big game animals in Alaska has been in effect for decades with certain exceptions. In recent years, exceptions have been made for hunting bears in predator control areas as a means of severely reducing bear numbers in an attempt to increase ungulates for hunters.

Individuals and fish and game advisory committees noted these exceptions and now wish to extend them over vast areas not part of predator control programs. We urge the BOG to reject proposals like this in an attempt to inform the public that fair chase standards (including prohibition of same-day airborne hunting) are still important and should be preserved.

Proposal 224. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would increase the bag limit of black bears in Units 7 and 15 to three annually with no closed season.

The listed justification for this proposal is that there is an increasing number of bears in Units 7 and 15 and bears are preying excessively on moose. Increasing the bag limit is projected to increase the bear harvest, decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on field data identifying limiting factors for ungulate populations that include other variables besides bear predation such as poor habitat, heavy hunting and poaching, severe winters and wolf predation, all of which have been shown to contribute to limiting ungulate populations in other areas. Bear predation may or may not be an important limiting factor, but there is no way of knowing absent field studies.

There is no recent biological information indicating excessively heavy predation on moose in Units 7 and 15, nor is there any reason to believe that reducing predators will result in more moose 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 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 BOG should not attempt to further reduce predator numbers.



We suggest that if the sponsor of this proposal suspects bear predation is limiting moose numbers in Unit 7 and 15 he should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of bear predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and also ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 226. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would increase the bag limit for wolves to 10 per day and allow snowmachine pursuit of wolves in Units 7 and 15.

The listed justification for this proposal is that wolves in Units 7 and 15 are preying excessively on moose. Increasing the harvest of predators is projected to decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on field data identifying limiting factors for ungulate populations that include other variables besides predation such as poor habitat, heavy hunting and poaching, and severe winters, all of which have been shown to contribute to limiting ungulate populations in other areas. Predation may or may not be an important limiting factor too, but there is no way of knowing absent field studies. We suggest that if the sponsor of this proposal suspects predation is limiting moose numbers in Units 7 and 15, that he should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of predation in relation to other limiting factors.

There is no recent biological information indicating excessively heavy predation on moose in Units 7 and 15, nor is there any reason to believe that reducing predators will result in more moose 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 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 BOG should not attempt to further reduce predator numbers.

We suggest that if the sponsor of this proposal suspects bear predation is limiting moose numbers in Unit 7 and 15, that it should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of bear



predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and also ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 230. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would change the regulations requiring guides to accompany hunters at black bear bait stations.

We endorse the present regulations requiring guides to accompany hunters at bear baiting stations.

Conclusion

We recognize that not all individuals who submit comments and proposals are wildlife professionals. However, it is our opinion that proposals submitted to the BOG often lack necessary scientific justification to support their passage. Unfortunately the majority of proposals in the March, 2011 proposal book focus narrowly on suppressing predation, failing to consider other factors that lead to low – or perceived low – moose or caribou population density: weather, displacement due to disturbance, over-harvest, excessive road mortality, lack of adequate habitat, and other factors.

Further, proposals aimed at allowing what we deem *de facto* predator control attempt to circumvent the formal process through which predator control programs are publicly reviewed, adopted and implemented. We urge the BOG to reject proposals that aim to reduce predation absent biological justification; predator control programs should only be adopted through the formal predator control implementation planning process.

We continue to maintain that the State of Alaska has failed to scientifically justify their predator control programs, which are driven more by politics than science. Independent scientists and wildlife experts both in Alaska and across the nation have criticized the single species wildlife management strategies employed by the state. We continue to urge those charged with the responsible and sustainable management of our wildlife resources – including predators – to develop a comprehensive, scientifically justifiable and socially acceptable predator control program based on the 1997 National Research Council Review.

Thank you for considering our comments.



Sincerely,

Theresa Fiorino
Alaska Representative
Defenders of Wildlife

On Behalf of:

Valerie Connor
Conservation Director
Alaska Center for the Environment

John Toppenberg
Executive Director
Alaska Wildlife Alliance



BOG comments for Region II meeting March, 2011

Alaska Department of Fish and Game

Boards Support Section

PO Box 115526

Juneau, AK 99811-5526

Dear Chairman and members of the board,

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BOARDS

Proposal 150 – Support

The moose population on the Kenai Peninsula is declining at a rapid rate. Black bears are a major source of predation on moose calves. Franzmann et al. (1989) found through radio collaring calf moose during the spring on the Kenai Peninsula that black bears resulted in 70 percent of calf mortalities, and total predation resulted in 86 percent of calf mortalities.

There are currently no indicators the black bear population is declining or unhealthy, whereas the moose population is very unhealthy right now to where in unit 15C the moose season may have to be closed. Further restrictions on legal antler configurations or moose season closures preventing hunters from harvesting moose **should only** be enacted if accompanied with increased hunting opportunities on predators. Calf moose stand little chance of survival with as many bears as there are currently on the Kenai Peninsula. I've hunted the Kenai Peninsula for 15 years now and I've never seen calf:cow ratios as low as they are. It's to the point where I'm almost shocked to see a cow with a calf while moose hunting in August and September, because only about one cow out of 10 will have a calf. Only one cow out of maybe 100 will have twin calves, once a person gets a few miles away from populated areas.

Proposal 154 – Support

This was my original proposal, and I stand by it as it is. I just want to clarify a few things that I stated in my proposal:

"I can honestly estimate there are at least 500 brown bears on the Kenai Peninsula, so if the harvest is set at 30 for the registration hunt, and count the average of 20 DLP's per year into that harvest would mean around 50 brown bear a year would be harvested on the peninsula. That would be around 10 percent of the population per year, and it has been shown that bear harvests under 10 percent of the total population shows no negative effects on the population. It actually has positive effects on the population because it removes the big boars that eat the cubs, and chase the smaller bears and sows with cubs away from the best feeding areas to populated areas where these bears get into trouble. Then make it so that no more than 20 reproductive females can be harvested, and



Personal observations from hunting on the southern Kenai Peninsula for 15 years and living on the Kenai Peninsula now for 23 years I can say with certainty I've never seen bull:cow ratios as low as they currently are, calf:cow ratios as low as they currently are, and the moose population as low as it is currently. My grandpa has lived on the southern Kenai Peninsula for over 60 years now and his personal observations match mine exactly. In 15C over 100,000 acres have burned since 1996, and at least that many acres have been logged, which has created great moose browse to increase calf recruitment. Calf recruitment has not increased because of excessive predation by brown bears and black bears on calves, and also brown bears and wolves on adult moose.

Every year for the last couple of years I've hiked up Powerline Pass in the Chugach Mountains outside of Anchorage in late September and early October during the moose rut. Nearly every other cow I see at Powerline Pass or in the very least one cow out of every 3 has a calf with it, and a good portion of these cows have twin calves. The Kenai Peninsula should be able to match the reproductive capabilities of these Anchorage bowl moose. The cows on the southern Kenai Peninsula aren't meeting these fall calf recruitments strictly because of bear predation. The moose in Anchorage predominately eat in, out of, and around people's yards, there is no way this is better moose browse than what the south Kenai Peninsula can offer. The sole reason why calf:cow ratios are higher in the Anchorage bowl area is because the cows can seek refuge from the bears around town and people's homes to grow their calves throughout the summer months.

This last moose hunting season (2010) over the course of 13 days I saw 10 **different** brown bears in an area not much bigger than one square mile. The area I saw those bears in, I can definitively say would not encompass 2 square miles. Six of these bears I saw were within a couple hundred yards of one moose gut pile. I would ask the question to anyone on the board of game, have you ever heard of 6 brown bears surrounding one gut pile? If that's not an indicator of a very high and very dense brown bear population then I don't know what is. How would a calf moose ever stand a chance with that many brown bears around? It was borderline dangerous to hunt the Caribou Hills this year, nearly every day produced a sighting or a run-in with a brown bear and there was a couple of days where we had brown bears huffing and puffing at us, but never seen them. It got to the point to where my hunting partners and I would be out hunting and hear sticks breaking or an animal walking through the woods and we would get prepared for seeing a brown bear, and the fact that it might be a moose would come second to mind. Before this fall when I heard animals walking in the trees I would always think, where's the moose? In Proposal 152 that group of hunters reported seeing 10 brown bears off of Deep Creek, which is a good distance away from where I was hunting and were almost certainly different bears. Other people I know that hunted the Caribou Hills this year also reported seeing bears and everyone saw lots of brown bear sign.

An observation that my hunting partners and I have been noticing lately is that cow moose aren't 'calling' in the fall anymore. My hunting partners nor I have heard a cow moan in



the last 2 seasons, and I believe 3 seasons ago someone in our group heard one cow moan during the fall hunting season. I can tell you that 5 or 6 years ago almost every night after September 10th given the right conditions you could hear cows moan and bulls grunt. It used to be fun to find a spot, sit and just listen to the moose. I've heard of several reports of hunter's cow calling and bringing in brown bears. Proposal 152 in this proposal book mentions bringing in brown bears while calling, and in fall 2009 another hunting group in the Caribou Hills had to shoot a brown bear in Defense of Life or Property as it came after them and their horses when they were moose calling. It doesn't take a genius to figure out from these examples that the cow moose have most likely quit calling because it brings brown bears. It takes high numbers and a very dense population of brown bears in order to influence moose behavior that is now being seen out in the Caribou Hills.

If it was lack of browse availability more than predation that was affecting moose populations then it would be expected caribou and sheep numbers on the Kenai Peninsula would be stable. This is not the case, the Killey River Caribou herd numbers are low and declining, Kenai Mountain Caribou herd numbers are low and declining, sheep numbers are low and declining, and sheep harvests are declining dramatically (Based on population and harvest figures handed out at the Kenai/Soldotna Fish and Game advisory committee meeting 2010). Being that wolves prey often on old rams, which is required of a ram to reach full curl it isn't hard to figure out that wolves are a major factor in causing this decline in sheep harvests. As moose populations decline brown bears and wolves are forced to resort to eating more caribou and sheep to sustain themselves.

The local management practices are not being conducted according to sustained yield principles as written in the Alaska State Constitution. Game populations are supposed to be managed according to sustained yield so that Alaskan residents have the best opportunity possible to harvest game. If the moose season is closed or harvest opportunities greatly reduced, then it is obvious the Kenai Peninsula is not being managed according to sustained yield. Brown bear populations are getting out of control and it's frustrating to see bear and moose populations so mismanaged on the Kenai Peninsula when most GMU's in Alaska currently allow for one brown bear every year, or in the very least one brown bear every 4 years, and some even allow 2 brown bears every year. Currently GMU 14C is the only area that allows less brown bear hunting opportunities than the Kenai Peninsula. GMU 14C only has less hunt opportunities because the area surrounds the largest population center in Alaska. The Kenai Peninsula has great brown bear habitat: lots of grasses, sedges, forbs, low and high bush cranberry bushes in the spring, summer, and fall, plenty of streams with good returns of salmon, most years there is a bountiful berry crop, plus moose, caribou, black bear, or sheep if a brown bear desires to prey on one. There is no reason not to allow substantial brown bear hunting on the Kenai Peninsula with this kind of brown bear habitat available. You would have a hard time convincing me the Kenai Peninsula has worse brown bear habitat than GMU 13 and in GMU 13 hunter's harvest over 100 brown



bear a year currently, and the moose and caribou populations are very healthy GMU wide. Even with these high harvest levels there are still adequate numbers of brown bears around in unit 13.

Presently brown bear management objectives are being exceeded and moose population management objectives aren't even being met. Bull:cow ratios have dipped far below 15:100 as outlined in the 2008 Unit 15 moose management report, and if there was a calf:cow ratio listed as a harvest objective then this ratio probably would also not be met. 2009 calf:cow ratios were 18 calves per 100 cows in unit 15C and this ratio hasn't improved based upon on all indications from fall 2010. The year before in 2008 showed an even more dismal calf ratio with 10 calves per 100 cows. The calf ratios will only improve if brown bear and black bear harvest opportunities are increased. The 2008 unit 15 moose management report does state to, "maintain a healthy and reproductive moose population" and currently there is more potential for higher moose numbers in 15C that is not being attained because of poor predator management. Without increased predator harvests, especially on brown bear and black bear all ungulate populations on the Kenai Peninsula will continue declining.

Proposal 152 – Support

Anything that would increase brown bear harvest needs to be enacted. Due to large portions of federal land in units 15A and 15B, it may be difficult to increase brown bear harvests as much as needed. Separating the three subunits into their own brown bear harvest objectives would allow for increased bear harvests in 15C, while not increasing harvests quite as much in 15A and 15B. To close the moose season or impose further antler restrictions in unit 15C would be **unacceptable** without a very large increase in brown bear and black bear harvest opportunities in unit 15C.

Proposal 153 --Support as Amended

100 Brown bear may be a needed harvest objective. In the very least 50 brown bear per year should be harvested. Further restrictions on moose hunting should **only** be accompanied with increased brown bear harvests. It would be **unacceptable** to close the moose season, or further place more antler restrictions on the Kenai Peninsula without increasing harvest opportunity and bag limits for brown bears, black bears, and wolves. The moose population will not increase by closing the moose season or reducing the number of bulls taken. The current problem is not enough calves are able to survive the bears during the summer months when they are most vulnerable. Higher amounts of adult cows and bulls are also being killed by the high density of brown bears and wolves.

Proposal 155 – Support

Moose populations on the Kenai Peninsula are declining rapidly, calf:cow ratios are horrible. Sheep populations are also declining and sheep harvests have declined sharply on the



Kenai Peninsula. Recent research has shown coyotes have to be significant predators on sheep lambs, and I've personally seen coyotes kill 2 moose calves. The only way to change the current sheep and moose population trends will be to increase predator hunting. Brown bear, black bear, wolf, and coyote harvests all need to be increased.

Proposal 157 – Oppose

This was my original proposal, but after hearing about the post-hunting season bull:cow ratios it is too late. There have been reports as low as 6 bulls per 100 cows not counting spike/forks, which the spike/forks aren't really considered breeding bulls so basically for every one hundred cows in 15C there is 6 bulls to breed them. Eliminating the 3 tine rule and shortening or closing the spike/fork season should have been adopted a few years ago when bull:cow ratios were considerably below 25:100, which is considered to be a healthy bull:cow ratio for Alaskan moose populations. Furthermore no effort was made to curtail the killing of illegal bulls and now the bull population on the peninsula is low enough that the season probably needs to be closed. Also moose populations have been steadily declining and there have been little efforts made to increase hunter harvests on black bears, brown bears, or wolves.

Proposal 159 – Support

As a minimum the spike/fork needs to be taken away as a legal moose for harvest in 15A and 15C. It might even be too late for this, because of poor management on the Kenai Peninsula moose hunting in 15C might have to be closed. Eliminating an antler(s) configuration for legal harvest or moose season closures should **only** be instituted if brown bear, black bear, wolf, and coyote seasons and bag limits are liberalized and harvests are increased.

Proposal 161, 162 – Support

Too many illegal bulls are currently being harvested on the Kenai Peninsula and these harvests need to be reduced by any means possible, because all honest moose hunters are suffering. If there was more Trooper presence during moose hunting season then sealing wouldn't be necessary. If troopers aren't going to patrol heavily hunted areas like the Caribou Hills, Falls Creek Road, Mystery Creek Road, etc. then the sealing of antlers needs to be required. I would even support a (20 dollar fee?) for all moose hunters intending to hunt unit 15 that goes towards enforcement of heavily hunted areas. Currently there is an average of 3000 peninsula moose hunters, multiply that by 20 and that's 60,000 dollars that can go towards enforcement during moose season.

Proposal 168 – Oppose

It would be absolutely foolish to have a cow hunt on the southern Kenai Peninsula with the steady decline of moose populations. No cow permits should be given out until moose



populations stabilize, calf:cow ratios increase, and bull:cow ratios increase. The southern Kenai Peninsula moose population is probably 1/2 or 1/3 it was 15 years ago. With this kind of rapid decline it would be foolish to have a cow hunt.

Proposal 169 – Support

See reasoning for proposals 157 and 159.

Proposal 171 – Support as amended

5 wolves per year, no closed season. Moose populations are low and declining, caribou populations are low and declining, sheep populations are low and declining, and there are no signs these trends will reverse under current management practices. Liberalized seasons and bag limits for predators on the Kenai Peninsula need to be established if moose, caribou, and sheep populations are to stabilize and start to increase.

Proposal 172 – Support

See reasoning written in proposal 171.

Proposal 173 – Support as amended

As quoted in proposal 173,

“This reduction in harvest opportunity should only be adopted if accompanied by an active predator management program that addresses both black bears and wolves.”

This should also include increased harvest opportunity for brown bears. At some point brown bear harvests must be increased or we might as well name switch the name of the Kenai National Wildlife Refuge to the Kenai National Brown Bear Range. I worry if current regulations aren't changed there will never be the opportunity to hunt moose or see moose numbers on the Kenai Peninsula like I did when I was young with the current management practices that are being conducted.

Proposal 174 – Support as amended

Unit 15C also needs to be considered an intensive management area. Moose numbers in 15C are low and declining, bull:cow ratios are extremely low, calf:cow ratios are low and declining, and until these ratios and the overall population stabilizes and starts to increase this area should stay under the label of intensive management. Intensive management should include liberalized seasons, bag limits, and increased harvest of black bear, brown bear, wolf, and coyotes.



Proposals 178, 180, 181, 182, and 183 – Oppose

Bull populations are too low to allow for increased harvest opportunity. Motorized vehicles have from August 20th to September 10th, and September 15th and 16th to harvest a moose. These are more than enough days to allow for a good chance at harvesting a moose.

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Comments by Brian Blossom, BS in Biological Sciences at UAA.

Writing as a concerned hunter and outdoorsman on the Kenai Peninsula.

P.O. Box 3975

Soldotna, AK 99669



Gary Keller
5915 Muirwood Dr.
Anchorage, Ak 99502
907-351-3642
12 January 2011

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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

Dear Honorable Board Members,

I urge you to carefully consider the comments below regarding the upcoming Southcentral and Central/Southwest Proposals and to act accordingly in the best interests of all of the people of Alaska:

OPPOSE PROPOSAL 193 - 5 AAC 85.065.

Hunting seasons and bag limits for small game.

Modify the bag limits for waterfowl in Region II and Region IV.

I'm writing in concerns over prop 193. After reading the prop many people will look at the numbers and fall for the misleading information that has neither accurate informations nor reference. These facts seem to without sufficient evidence that changes to current management regulations would have any positive impacts to Goldeneye populations. The numbers and partial facts that were provided is the intent to have this prop move forward in getting passed. For instance southcentral AK is the northern most extent of Barrow's goldeneye wintering range and has very few points of access (Whittier, Seward, and K-Bay). Even if every Barrow's goldeneye was killed in these areas, the impact on the worldwide population of BAGE would most likely be insignificant

Moving Goldeneyes would create an ethical and Law enforcement problem. Sept when Duck season is open. Just about all duck are brown. And there are goldeneyes in September located in freshwater lakes and rivers. Goldeneye breeds in some of the same habitats as dabbling ducks and therefore are frequent harvested along with mallards, pintails, etc. Do you think a trooper could differentiate a molting Barrow's goldeneye from a common goldeneye if you had three brown birds in your bag? And how about the average duck hunter shooting over decoys? Even when birds are in breeding plumage you have to have a pretty good eye to differentiate between the two



goldeneye species. Here in South Central, most Sea Duck hunting does really doesn't get under way until October. November is the prime month of hunting here in South Central. In South Central the season ends December 16. That gives "US" hunters really two months to hunt. The number of Sea Duck hunters vary from region. South Central has the lowest of all the region where Sea Duck hunting is allowed. Weather, hunting access and boat status (winterized) plays apart of the low numbers compared to puddle duck hunters.

Inclosing Prop 193 lacks complete data and references on what Goldeneye species without any substantiated evidence that a change in management regulations would have beneficial impacts to Goldeneye populations in Alaska or across North American. Even ADF&G waterfowl biologist Tom Rothe said in his analysis: "The department has concluded that Sea Duck harvest in Kachemak Bay and Cook Inlet is not excessive." Further that the department "does not have any concerns that Sea Ducks are being over harvested and concluded that further restrictions to hunting will not provide conservation benefits to regional winter aggregations to populations of Sea Ducks." Rothe wrote guided hunting is not creating undue harvest, guiding is providing better quality public access to this specialized hunting." Surveys from 1999 to 2003 show from 15,000 to 30,000 ducks wintering in Kachemak Bay.

OPPOSE PROPOSAL 194 - 5 AAC 85.065.

Hunting seasons and bag limits for small game.

Change the regulations for waterfowl in Region II and Region IV.

Proposal 194 clearly states that this proposal has been submitted to benefit private landowners (i.e. "Landowners like me will benefit because possibly the rafts of birds that were depleted for 18 years ago by commercial guided hunting parties in front of my home will be allowed to grow back in the remote bay I have lived in for the past 32 years and I will once again be able to see them, hear them, and enjoy them in my front yard which is why I live remote") despite the fact that the wildlife resources of Alaska are public and are to be managed for the common good. This proposal can not pass. This will cause further land owners submitting proposals like this to gain exclusive rights to waters and woods.

Sincerely,



Gary Keller





P.O. Box 1102
Girdwood, Alaska 99587
www.girdwood2020.org

Executive Committee

Diana Stone Livingston, Chair

Hank Hosford, Secretary

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Chris von Imhof, Honorary Member

March 7, 2011

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

Subject: Support **Proposal 177 – 5AAC 92.550.Areas Closed to trapping.**
Close a portion of Unit 7 to trapping

To the Board:

Thank you for this opportunity to comment in support of **Proposal 177** as referenced above.

Girdwood 2020 is a citizen's group that advocates for thoughtful resort, recreation, economic and community development in the Girdwood area. We also advocate for the region's natural setting and the mountain gateway community lifestyle this area offers. Our organization realizes that a healthy community has a good economy, and to that end we support wise valley infrastructure as well as education, employment and economic activity consistent with a mountain resort community. Our membership includes both Girdwood residents and non-resident property owners, and other interested parties, all committed to the area.

Girdwood 2020 recognizes the importance of harvesting fur bearing animals to the State of Alaska as well as the role trapping played in the origins of our community, so we did not arrive at our position lightly. Natural resource revenues are the backbone of our State and we all enjoy the job and infrastructure benefits they provide. Where possible we advocate for multiple use of public lands and we therefore encourage compromises in land use. However, there are some situations where circumstances are very unique and call for restrictions.

The overriding issue regarding trapping activity in the Portage Valley is the very high visitation to the area, which has become a recreational destination that is virtually one of a kind in South Central Alaska. Portage Valley is a critical site for tourism and local use. Portage valley is transected by a main road with numerous developed recreation sites throughout. The Forest Service Visitor Center is one of Alaska's major attractions.

Because of the extensive development and narrow valley floor, any reasonable buffer zone would virtually close the area in any case. To leave scattered portions open encourages what is already occurring: limited trapping improperly adjacent to public use sites. These traps have already taken pets, and human incidents are bound to occur. There is simply too little space available in Portage Valley that is not in conflict with high use areas.



March 7, 2011

Page Two of Two

Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
Support of Proposal 177

Girdwood 2020 supports multiple use and encourages tolerance between different lifestyles and activities. Nevertheless, unusual circumstances arise that justify restrictions. We believe Portage Valley is one of these exceptions, and support the trapping closure concept of Proposal 177.

We thank the board for this consideration.

Sincerely,



Diana Stone Livingston
Girdwood 2020 Chair



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Anchorage, 22 January 2010

Liliana Naves
4200 Crannog St
Anchorage, AK 99502

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

OPPOSE PROPOSAL 193 - 5 AAC 85.065
Hunting seasons and bag limits for small game
Modify the bag limits for waterfowl in Region II and Region IV

Honorable Board Members,

I urge you to consider the comments below to the Southcentral and Central/Southwest Proposal 193 and to act in the best interest of all of the people of Alaska to protect hunting opportunities. Proposal 193 would lower bag limits for Goldeneye species in much of Alaska to presumably reduce mortality by sport hunt harvest. However, I believe Proposal 193 to be flawed by an incomplete and inappropriate use of biological data and sport harvest estimates. Without sufficient evidence that the proposed changes to harvest regulations would have any positive impacts to Goldeneye populations, I believe that Proposal 193 would reduce harvest opportunities for Alaska hunters without justification.

Proposal 193 argues for lowering bag limits based on Goldeneye life history characteristics and population trends while the sources of this information are not identified. Although I agree that Goldeneye are generally long-lived, K-selected species, the authors fail to cite scientific studies to support their claims regarding population estimates and trends. Without transparency of study design and statistical methods used to derive these population numbers, the biological data presented should be taken with skepticism.

Proposal 193 presents biological data for North America waterfowl populations and apply these data to the management of Alaska populations, what I argue to be misguided. For example, the proposal states that "Barrow's Goldeneye have the lowest population densities among the other hunted ducks in this general duck bag limit." This population density might be true for all of North America, but likely does not apply to the state of Alaska. For instance, Barrow's Goldeneye have much higher population densities in coastal management units of Alaska as compared to other species listed in Proposal 193, such as Redhead. As in Proposal 193, there are currently around 1.1 million Redhead subject to harvest under current Alaska regulations. In reality, most Redheads breed in the prairie pothole region of Canada and the Lower 48 and never migrate to Alaska. Only a relatively small number of redheads occur in interior Alaska and only

1



Anchorage, 22 January 2010

Liliana Naves
4200 Crannog St
Anchorage, AK 99502

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

OPPOSE PROPOSAL 194 - 5 AAC 85.065
Hunting seasons and bag limits for small game
Change the regulations for waterfowl in Region II and Region IV

Honorable Board Members,

I urge you to consider the comments below regarding the Southcentral and Central/Southwest Proposal 194 and to act in the best interests of all people of Alaska and to protect hunting opportunities.

Proposal 194 is very unclear and does not identify how management regulations should be changed to address guided hunting and non-guided hunting. Also, this proposal presents no evidence to support claims that take by guided or non-guided hunting is causing localized depletion of resources or that this hunt is a source of excessive crippling and reckless waste.

Despite refereeing to "everyone," Proposal 194 specifies that only a few individuals would benefit from it ("Landowners like me will benefit because possibly the rafts of birds that were depleted for 18 years ago by commercial guided hunting parties in front of my home..."). Wildlife resources of Alaska in public waters are to be managed for the common good and a wide variety of users as opposed to individual private landowners.

Specific hunting regulations refereeing to guided and non-guided sport hunting could perhaps be addressed in a future proposal that clearly outlines how regulations should be changed. However, as currently written, Proposal 194 sets an unfair precedent for management of public resources for the benefit of a few local landowners.

Thank you for consideration,

Liliana C. Naves



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February 1, 2011

Alaska Board of Game
c/o ADF&G Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Chairman and Members, Alaska Board of Game;

This letter is to provide written comments in opposition to Proposals 193 and 194 scheduled for the spring Board meetings in Wasilla and Anchorage. I oppose the bag limit restrictions on goldeneyes in Proposal 193 because there is no identified conservation need for restrictions. I also oppose the other ideas in the proposal, to put goldeneyes in the special sea duck limit, form a Board of Birds, and create separate rules for guided hunting—these are unnecessary and based on erroneous assumptions. I also oppose Proposal 194 which would create a tiered priority system to restrict guided bird hunting. This proposal ignores the valuable services that guides provide for the benefit of hunters and would result in an unworkable system of dual regulations that would penalized hunters who use guides.

For the record, I am a 33-year resident of Eagle River, Alaska. I have hunted waterfowl in Alaska for at least 30 years. In addition, for 30 years I served as a federal and state waterfowl biologist and migratory game bird manager—I have extensive knowledge of duck biology, management programs, harvest and regulatory strategies, and data on duck hunters and harvest.

My wife and I avidly hunt waterfowl annually in upper Cook Inlet. We also have hunted elsewhere in the Gulf Coast Zone from Cold Bay to Cordova. Over the past 16 years we have hunted late-season ducks in Kachemak Bay. Goldeneyes are a small but important component of our diverse hunting opportunities—during September and October on Susitna Flats and, more prominently during November and December when most migrant ducks are gone, and we shift to hunting coastal waters. We have invested in special hunting equipment for duck hunting, including clothing and decoys, invested in raising and training retrievers specifically for sea duck hunting, and we contribute income to local businesses wherever we hunt.

Proposal 193

I am opposed Proposal 193 primarily because there is no demonstrated conservation need to reduce harvest of goldeneyes or restrict valuable hunter opportunity. The fundamental question here is whether the apparent harvest rate on goldeneyes is sustainable, relative to status of the appropriate stock of birds. The information offered in Proposal 193 to support bag limit reductions is inaccurate, incomplete, irrelevant, and misleading. Here, in brief, are my assessments of the key issues, based on the best available data:



Bay or Prince William Sound. Although sea ducks exhibit site fidelity, it is not absolute, and there is evidence that there are annual shifts in distribution and interchange among areas within regions. Wintering ducks adapt to changing habitat conditions by moving around and, in the process, they mix with other flocks and populate suitable coastal sites. At the fine scale envisioned by the proposer, hunting may temporarily remove and displace ducks, but this does not constitute depletion of the stock or extirpation of a discrete “population” unit.

State and federal wildlife agencies appropriately manage waterfowl at the broad scale of regional populations and at the flyway level, based on principles of population biology and supported by many years of surveys and research. In that regard, management programs and hunting regulations for goldeneyes in Maine, Washington, and British Columbia deal with different duck populations and circumstances that are irrelevant to southern Alaska. Micromanagement of waterfowl at a fine geographic scale is not scientifically sound. In practical and economic terms, it is not feasible or necessary to monitor ducks or regulate harvest at the fine scale of local marshes, bays, and coves.

In summary, I encourage you to reject proposal 193 because: (1) numbers of goldeneyes are relatively stable and locally abundant in late fall and winter—hunting is not a factor; (2) the current low level of harvest does not warrant further restrictions and unnecessary reduction of important harvest opportunity; (3) goldeneyes are not subject to “local depletions” that affect populations or long-term seasonal distribution patterns; (4) proposed bag limit restrictions would apply to a tremendously extensive area encompassing varying diversities of waterfowl, conditions, and hunting effort; and (5) this proposal was generated by a property owner to restrict or stop hunting at a local site—an issue that is best treated as a zoning conflict that has no relation to waterfowl conservation or legitimate hunting.

Proposal 194

I am opposed to Proposal 194 which would establish separate bird hunting regulations for hunters with commercial guides and those that are not when species decline or there are user conflicts. My opposition comes from a few simple points:

- There is no evidence that guided waterfowl hunting results in substantially higher harvests. There are a small number of waterfowl hunting guides in Alaska (they must register with ADFG) and the number of clients they serve is also small. Across the country, harvest of waterfowl is primarily regulated on the basis of individual hunters subject to seasons and bag limits, regardless of who they hunt with.
- Although hunting pressure may temporarily displace waterfowl, guiding does not result in “depletions” of waterfowl populations. In fact, it is in a guide’s best interest to move around and distribute harvest over many areas to maintain high-quality hunting opportunities for future clients.
- Hunting ducks, especially sea ducks, in winter and along remote coasts is not easy and entails special challenges (local knowledge of habitats and distribution, special gear, poor weather). Guides provide a valuable service to Alaskan hunters and visitors alike, in that they can offer more safe and efficient hunting, local knowledge, and manage the behavior of hunters.



February 1, 2011

Board of Game Comments

Alaska Department of Fish and Game Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Dear Game Board:

I write in support of Proposal 177-5 AAC 92.550 to close the Portage Valley floor south of Portage Creek to trapping. I live in Girdwood and periodically use the Portage Creek drainage in the winter with my dog.

The Portage Creek valley floor is an urban space with a visitor center, Class 4 and 5 trails, and easy road access to the entire area. There is no reason to support a few recreational, roadside trappers in this space when there are other nearby valleys that are seldom visited. Dogs, children, and adults use the Portage area for cross-country skiing, rescue dog training, and walking. There have been instances of dogs getting caught in lethal traps; it is only a matter of time before a dog dies or a person gets hurt.

There is no alternative other than to ban traps in this valley, especially when there are alternative valleys in which to trap. Trappers can go to the Placer Creek drainage or the Twenty-Mile River drainage. And if signs are posted where traps are located, those traps most likely will be sprung or removed. Banning is the best alternative.

Sincerely,



Kate Sandberg

PO Box 1025

Girdwood, AK 99587

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*Alaska Trappers Association
PO Box 82177
Fairbanks, AK 99708*

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ATTN: BOG COMMENTS
Alaska Department of Fish & Game
Boards Support Section
PO Box 115526
Juneau, AK 99811

January 31, 2011

Dear Mr. Chairman & Members of the Board:

On behalf of the nearly 1000 members of the Alaska Trappers Association, we wish to share our opinions on several proposals which you will be considering during your 2011 Region IV meeting in Anchorage.

We are NEUTRAL on Proposal #1, #2, #3

We defer our opinion on the extension of the lynx and wolverine seasons in unit 9B to the judgment of the Department of Fish & Game and the Board of Game.

We OPPOSE Proposal #38

The ATA opposes the use of radios by private citizens in the hunting and harvesting of all wildlife.

We SUPPORT Proposal #71

We support the elimination of the sealing requirement for beaver. We defer to the judgment of the Department regarding the sealing of marten. We would suggest other methods for tracking the harvest of one or both species as necessary. Tracking could be done in a method similar to what is used for moose, ie, total harvest reported on-line or by mail after the season concludes.

We OPPOSE Proposal #72

The ATA is opposed to the closures of proposal #72 as it is written. The language of the proposal is ambiguous and will result in changes that do not meet the stated goals. For example, the closure is not species specific. Under-ice trapping presents no dangers and is largely invisible. Further, beavers may present a problem for access by damming up culverts. Further ramifications include eliminating opportunity for accessible education in wildlife management for youth. The Board might consider some type of recommendation for #330 conibear or larger foot-hold traps that would be placed on dry ground.

We SUPPORT Proposal #104

The Area Biologist is in support of the lengthening the season for beaver trapping in Units 9 and 17. There is no shortage of beaver in this area.

Regarding Proposals #111, 112, and 113

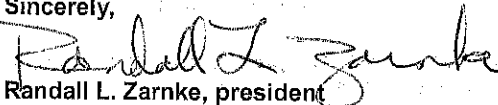
The ATA supports the concept of consistent bag limits between units and regions. We support the elimination of bag limits for coyotes. We do not support the concept of a year-round hunting season for coyotes. We do not have a biological concern with these proposals.

We are NEUTRAL on Proposal #187

The ATA offers no position at this time regarding issues of bears because we understand that these proposals will currently be deferred. We look forward to offering comment when these matters are taken up in March of 2012 in Fairbanks.

We appreciate the opportunity to participate in the regulatory process.

Sincerely,


Randall L. Zarnke, president



Alaska Trappers Association
PO Box 82177
Fairbanks, AK 99708

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FEB 07 2011
BOARDS

ATTN: BOG COMMENTS
Alaska Department of Fish & Game
Boards Support Section
PO Box 115526
Juneau, AK 99811

January 31, 2011

Dear Mr. Chairman & Members of the Board:

On behalf of the nearly 1000 members of the Alaska Trappers Association, we wish to share our opinions on several proposals which you will be considering during your March 2011 Region II meeting in Anchorage.

We OPPOSE Proposal #128

We oppose the closure of wolverine trapping in Units 6 and 14C based on current population estimates. The cited wolverine study area is not the same as the recommended closure area. Trapping in these areas does not pose a threat to sustainable wolverine populations.

We SUPPORT Proposal #129

The ATA supports and applauds the efforts of the ADFG and JBER for their determination to work together and expand opportunities for trappers in Alaska.

We SUPPORT Proposal #149

Beaver are an abundant resource in units 7 and 15. An increased harvest will not negatively impact the beaver population.

Regarding Proposals #155, 188, 189, and 198

The ATA supports the concept of consistent bag limits between units and regions. We support the elimination of bag limits for coyotes. We do not support the concept of a year-round hunting season for coyotes. We do not have a biological concern with these proposals.

We OPPOSE Proposal #177

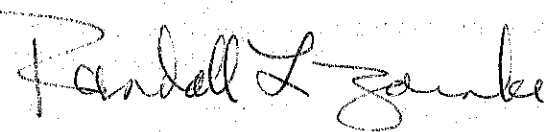
There is no reason for such sweeping closures. The ATA objects to the use of emotional and inflammatory language, i.e., "children" being caught in traps or closure to "all trapping." These concepts do not bring about meaningful discussion or scientific management practices.

We OPPOSE Proposal #192

We oppose changes that have no scientific basis and that are not purposed toward meeting sound management goals. We oppose "one size fits all" changes and closures that impact entire Regions which negatively impact trapping. Further, "set back" rules can prove to be detrimental when created. If a pet were to get into a trap or snare 1/2 mile off a trail there is a lower probability that it would be quickly freed when compared to the likelihood of a rescue nearer the trail.

We appreciate the opportunity to participate in the regulatory process.

Sincerely,



Randall L. Zarnke, President



Region IV & Misc. Region Wide Proposals

RECEIVED
FEB 18 2011

Comments to the BOG for the 3.2011 meeting.

Submitted by:
Master Guide Smokey Don Duncan

Proposal # 25 Strongly object. Guides will soon be asking what a hunt for 6 foot sow is worth. Currently the common practice for many area locals is to shoot, or shoot at, any and every bear they see. Seldom is retrieval even attempted. Ask why the regional native corporation and area village corps do not let guides hunt bears on their lands. The areas average bear size has dropped considerably over the last 12 years.

Proposal # 26 Strongly object. Please note. The Park Service doesn't care what the State wants, so why should we care what they want? It is outrageous that the Park Service or Advisory Council would take it upon themselves to suggest 17 B wide changes instead of just changes close to the Park, which comprises very little of 17 B. I bet 17 B has more moose than the Park.

Proposal # 27 Strongly object. Many bears are killed now that are not salvaged. I seriously doubt this proposal will encourage the actual salvage of the bears. It will make legal year round hunting and market hunting. This drastic action is not needed. The highest moose populations are around the villages now because of what I call a wolf free zone, not because there are fewer bears or too many bears.

Proposal # 28 Strongly Object. See reasons listed for proposal # 25. There is little "burden to getting a bear sealed with in a 30 day time period. Villagers can get the bear sealed by F&WP or in Dillingham which they frequent. F&G has, in the past allowed a responsible individual to take on the duties of sealing bears in other villages. And it could be made so here.

Proposal # 29 Strongly object. See reasons listed in # 25 and # 28. This proposal would open up the year round whole sale slaughter of a valuable resource. The DLP process is not that cumbersome. A pain in the butt that is mostly from stupid questions. If the form were revised to asked 2-3 simple questions like "When? Where? Why?"; it would be substantially easier than 10 -15 pages of stupid questions.

Proposal # 30 Object OR support Ammended. The caribou herd is not in the area like it used to be or when it use to be. That is a fact. And access is tough for the villagers. But there has always a harvestable surplus in recent years, even when the non-resident season was closed. The herd is recovering. The harvestable surplus is many times located where you must fly out to reach it. There is no longer the need to keep the non-resident season closed. I could support this proposal if it included some allocation for the non-resident hunter. See my reasons, and proposals to address the problem in proposals # 31 & 32.



Proposals 31 & 32 Strongly Support one or the other. I would just like to add that the proposed time frame would not conflict with the area resident hunters as was mentioned in their reasons for proposal # 30.

Proposal # 33. Strongly Support. This is the minimum the Board should do. See proposal # 35 for reasons to eliminate the permit entirely. At the March 2009 Board meeting some of the Board members were in favor of leaving the registration period open until all 75 permits had been issued. The area biologist felt that he would be put in a bad spot because the resident hunters had strict deadlines and that they would give him a hard time if non-residents had no deadline. BUT what was not mentioned was that there are no limits to the number of resident permits AND a F&G employee travels to the villages to personally issue the permits. They do not have to go to Dillingham between 8am-5pm on weekdays. A good compromise is to leave the registration open until all are issued which has never come close to happening.

Proposal 34. Support. And this does not benefit me at all. But the moose population is increasing both in the Refuge and on the inaccessible lands east of the Refuge. The Refuge has more accessible areas.

Proposal #35 Strongly Support. See reason listed above in comments on proposal # 33. The problem this registration permit was made to address was over by the time it was enacted in 2005.

Proposal # 36. Strongly Object. The upper unit 17 B moose population is not in decline. It is rebounding from depredation from wolves after the Mulchatna Caribou herd crashed. It is true the wolves got well established in upper 17 B during the high populations days of the caribou herd. When the herd crashed, the wolves turned to moose and killed them and or drove them out of the smaller drainages and creeks of upper 17 B, particularly the upper Nushagak. However, our surveys show those moose slowly returning to their old areas. The vast majority of wolves have also moved south toward Dillingham and the villages following the moose. To increase the moose population in upper 17 B at a faster rate and with out implementing wolf control, I submitted proposal # 38. Proposal # 36 is over kill and ceasing all moose hunting by everyone would not have solved the problem unless common sense had prevailed 10 years ago. A little foresight would have predicted that when the impending caribou crash happened; we would immediately need to increase wolf harvest to prevent over predation on moose by wolves. Bears are not the main problem. But, I personally witnessed them hunting new born caribou on the calving grounds and presumably they will turn to moose calves in the spring. But the bear population has been reduced already.

Proposal #37 Object. For a fact; this proposal would greatly benefit the air taxis operating out of Anchorage and Soldotna and drastically increase the number of resident hunters. The Big Game Commercial Service Board has refused to address Transporters and air taxis and their potential over harvest and the crowding problems they create. I understand the reason for the request but the registration permits for residents were put in



place with a hub, or village visitation requirement to favor local area residents. The resident registration permits were effective while the non resident permit registration was “too effective”. Make no mistake about it; the influx of air taxis and transporters chasing the crashing caribou lead directly to the low bull caribou numbers and to the passage of the non-resident moose registration hunt, RM 587.

Proposal # 38. Strongly Support. This singular adjustment can and I predict will eliminate the more drastic and extremely controversial alternatives for wolf control such as shooting from a plane or helicopter. I believe the Board must try all less controversial methods first. This is one of them. If a Statutory change is needed to implement proposal # 38 then request the needed change today as soon as you pass proposal # 38.

Proposal # 110 Object. If a resident will not spend a pittance of \$25 for the opportunity to harvest a brown bear then what do you think they will do with the hide? Spend \$1000 to tan it? Get real. Look at how many hides you see hanging in village houses. I am not talking about subsistence brown bear for food. That fee is waived already and the trophy value must be destroyed. But the fact is I have tried to donate brown bear meat in the villages and the only takers wanted it only to feed their dogs. And one guy said his dogs would not eat it. So let us not kid ourselves. Eliminating the brown bear tag fee just devalues a valuable resource, encourages waist and negatively effects the guiding industry. What can we sell a 6 foot sow hunt for?

Proposal #118 Support with Ammendment. The problem exists. The simple solution is to require the non-resident to show proof of a guide contract with-in 1 month after the draw and before the actual permit is issued. Otherwise the permit goes to the next person on the waiting list held by F&G. Similar to what they have done in the past for Musk Ox. If the list is exhausted then it goes to the first guide who shows up and requests the permit for a contracted hunter. Add this option to proposal # 122.

Proposal #119 Object. I do not believe the ratios and numbers presented are correct. I believe a more reasonable measure like Proposal # 38 should be used and maybe extended to the other units mentioned. The fact is that many areas of unit 17 have local herds around solitary mountains and they are doing fine and they do not migrate like the old herd did.

Proposal # 120. Object. History shows that F&Gs management of the Mulchatna caribou herd consisted of little more than population counts and indiscriminately raising the management goal to match the population so they could ignore the over population. The habitat in the wintering and calving grounds have been decimated, beat down to dirt, as a result. It will not recover soon. History shows that the original goal of 35-50,000 may have been about the right number. Ask me what should have been done and I'll gladly tell you since F&G stated in March 2009 they had no idea what happened.

Proposal # 122 Support amended. I recommend that anyone between the ages of 10 and 16 who draws a permit **must then buy** a license to hunt. If they can afford the hunt then they can afford the license.



Proposal #123 Strongly Object. I do not think we should have archery or muzzle loading special seasons unless there are safety concerns. It is hunting season and pick your weapon. And when special seasons for bear are implemented they should be after the general season.

Proposal # 135 Object. Any permit allocations between resident and non-resident should be based on past efforts and or past harvest rates.

Proposal # 185 Object. A 3 bear yearly limit is plenty enough.

Proposal # 186. Support, Amended . It should be enacted statewide. Should be modified to say you must be on the ground by 6- 8 pm to prevent land and shoot.

Proposal # 187 Object

Proposal 121. Object. This would close large areas to non-resident hunting needlessly if the Board continues to believe that it can not implement wolf control with out closing non-resident hunting.

Proposal # 194 Object. If the waterfowl guiding industry is like the big game guiding industry; the guided hunters are feeding Alaskan families via game meat donations.

Proposal #197 Support, Ammended. Should add wording to effect that says “must be on the ground by 6-8 pm to eliminate land and shoot. We have been asking for this modification for many years. It should have been enacted long ago and should be enacted well before we enact trapping.

Proposal # 199 Object. The “issue” raised is untrue and invalid.

Proposal # 200 & 201 Support. The issue is true. F&WP has asked the BGCSB to correct the problem with little having been done. This would be enforceable. Not easy but convictable.

Proposal # 202 Object. This proposal devalues grizzlies. If the hunter is too cheap to buy a \$25 grizzly tag, do you think he will spend \$1000 to tan the hide? If increased bear harvest is desired then loosen the current methods and means allowed so that those who desire grizzlies can harvest one easier. More importantly the Board can ask the legislature to decrease the brown bear and grizzly bear tag fee for non-residents and non-resident aliens. Then the guided hunters will be more likely to have the incidental tag in their hand and use it. I beg the Board to remember that guided non-residents are responsible for the taking of as much as 80% of the reported brown/grizzly bears in some areas. I would suggest that the Board recommend to the legislature that they establish a 3-4 tier tag fee for non-residents/aliens. \$500 where the desired harvest is at current levels. \$1000 where the harvest is too high or where the competition is too high or demand is high. A \$250 tag fee where increased harvest is desired. And lastly a \$25.0 tag fee where harvest must be



increased immediately. This approach directs hunting pressure where desired, values the resource as appropriate and generates money instead of losing money. Waiving the tag fee for residents should be used only in areas where harvest must be increased without a doubt.

Proposal # 203 Support Amended. Allow some non-resident permits. It is time the Board recognized that the moose populations have grown in part because of guided non-resident grizzly and particularly black bear hunters using bait throughout the region. When there are harvestable surpluses of this magnitude; the Board should repay the efforts by allocating some permits for non-residents. The permit would have limited attractiveness to non-residents because of the lack of trophy potential. It has been proven in other states and in Canada, that some out of state people wish to simply kill a moose and to kill a moose for food and will pay for it. F&G has identified areas of antlerless moose hunts that are undersubscribed. Maybe these areas should be opened to non-residents who may pay more to access the area. It is a good way for the State to generate license and tag revenue and get the job done.

Proposal #204. Community harvest for Minto

I strongly object to this proposal. Board members should be aware that in previous years the Dept employees have gone out of their way to drive 120 miles to Minto to register all those who stand in line. Issuing the permits in Minto and allocating a certain number of the permits to be issued in Minto strongly favor Minto residents. Many times in the past; someone would have to go around and wake people up in Minto to come and get the permit. It does not get any easier than it is currently. The proposers instead want to have to do absolutely nothing to get the lions share of the permits. The proposer makes no suggestion as to how the rest of the residents in the areas like Fairbanks, Eureka, Manley and Livengood are supposed to get their permits. The reason given, that "the people of Minto do not want to stand in line with non-Minto people" smells like racism to me.

When the Board directed that a large percentage of the permits would be issued physically in Minto that was a more than a fair decision and the current Board should uphold it.

Proposal # 214 Support Amended. F&WP have told me that they wish to see the non-resident accompanied at all times. Not just when the shooting happens. It bothers them when a non-resident is loosely wandering around with a brown bear tag and no one accompanying them. "closely accompanied by the second degree kindred at all times when scouting during the season, hunting, stalking or attempting to take" would be better language.

Proposal # 215. Strongly Object. The reason for this point system is clearly identified in the "What will happen if nothing is done?" column. It will change the odds. There is nothing more fair than the system we have now and this system creates a game to be



played, rules to follow, hoops to jump through etc... all to favor some who play the "game" well and punish those who do not. A simpler system would be create "x" number of tags and price them at auction.

Proposal # 221. Object. Tasing wildlife for fun is harassment under current definitions. There is no need for additional regulations. Passage may actually discourage the public from carrying the taser which may lead to more DLP bears. What will F&WP think when they see someone carrying one?

Proposal # 222 & 223 Neutral. Musk Ox have antlers? Does proxy hunting increase the chances someone has to obtain a trophy in trade for doing the hunt? IE: "Billy Bob; I'll go shoot your moose/musk ox if you let me keep the antlers/horns." Has this reason for trophy destruction disappeared?

BOG Bear Harvest, Conservation and management Policy. My comments and recommendations.
Managing Predation by Bears:

I would issue a strong reprimand for failing to include the one tool that is not controversial, the one tool that raises money for the State and the guide industry and is already in place and is simple to use. The tool is the BOG recommends to the BGCSB that they lift the 3 GUA restriction. And the BOG should demand that the BGCSB and or DNR, BLM and the USFWS comply immediately. A good case is the Yukon Flats where the Feds issue exclusive Guide Use area permits. They should allow other guides to guide for wolves and bears there. But their sole use contract forbids allowing entry by other guides. They need to change it. The regional corp. Doyon has refused repeated attempts by various people to guide bear hunters on their lands even when the village corps desire it. BLM has forbidden guided bear hunting entirely in the Ray Mountains during calving season and on the calving grounds. I wonder why herd growth is stagnant for over 30 years in prime habitat with scarce hunting pressure?

Long before we allow the trapping of bears we should allow guides to set up baits for clients with out having to guide them. To keep requiring guides to guide all the clients on a baited hunt, residents included, in an area where trapping is allowed is beyond belief. In any area where trapping might be considered, the BOG should request the elimination of the GUA restrictions and the personally accompany requirements. Same day airborne hunting over bait should have been permitted in many areas long ago and it should be in place before trapping or areal shooting is allowed.

I strongly feel it would be best to prioritize the tools the BOG would authorize. IE; baiting before lifting the GUA restrictions, same day airborne before trapping; trapping before killing sows and cubs, sows and cubs killed before aerial hunting...etc.

Concerning the sale of gall bladders. I find it not offensive at all and a heck of a lot less controversial than shooting sows and cubs or using helicopter gunships. There are States where selling the bladder is legal and Alaska should be next. Supplying the real market



with legal bladders will curtail and eliminate the illegal market. Now there is a positive step. The big lie that prevents the legalized sale of bladders is the lie that says bladders are worth \$30,000 - \$60,000 each. If that was so the Asians would be over here buying every bear hunt they could. Taking your own legally taken gall bladder back home is not covered under the CITIES requirement nor is it forbidden there under. The fact is, the market rate for a fresh black bear gall bladder is \$100. No more. I do find it offensive that you are required to waist something that is so valuable to others. And since the Board proposes to legal the sale of most other bear parts taken under a trapping license, I see no reason to keep the sale of bladders illegal. If legislative change is need ask for it today.

The Board should be aware that most interior villages and villagers do not harvest many black bears because of cultural beliefs. In many villages the women will not eat bear meat and some will not touch or even want to view a dead bear. Given those facts, I do not expect to see local villages harvest more bears for meat or furs even if trapping is allowed. The idea that a black bear hide is salable is unproven at best. Look at the current market. A tanned bear hide, when legal to sell, is lucky to bring more than the cost of tanning. In my 35 years in Alaska, I have seen 1 black bear coat made. And the maker gave it to me for nothing. I strongly believe that allowing the trapping of bears will lead directly massive amounts of wanton waist. Some trappers will simply roll the bear in the river. I doubt that allowing the hide to be sold will increase reported harvest or salvage.

And if you think you have problems with bears now; wait until the BGCSB and DNR put 50% of the guides out of business with their Guide Use Area Concession Plan that few (30%) of the guides support.

Submitted by:
Master Guide Smokey Don Duncan
299 Alvin st. Fairbanks AK 99712
457-8318





United States
Department of
Agriculture

Forest
Service

Glacier
Ranger
District

P.O. Box 129
Forest Station Road
Girdwood, AK 99587

File Code: 2350
Date: February 3, 2011

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BOARDS

Board of Game Comments
AK Dept. of F&G,
Boards Section Support
PO Box 115526
Juneau, AK 99811-5526

Dear Board of Game members

A proposal to restrict trapping in Portage valley has been received and reviewed. The proposal (no. 177 in the regulatory proposal book compiled for deliberations by the Board) would close the area south of Portage Creek to the toe of the mountains on the south side of the valley. Trapping would remain open to the north of Portage Creek. This letter contains my comments as the District Ranger responsible for land management activities in Portage Valley.

The Chugach National Forest management emphasis in Portage Valley is to provide developed recreation opportunities for forest visitors. The valley includes two developed campgrounds and approximately ten developed day use areas, including the nationally recognized Begich Boggs Visitor Center. Recently, the Forest Service has completed a fully accessible trail, the Trail of Blue Ice, which connects these developed sites from the Moose Flats picnic area near the Seward Highway to Portage Lake.

As a result of these improvements, recreational use in the valley is increasing. In particular, winter use is increasing. The newly completed trail provides outstanding opportunities for winter hiking and cross country skiing. Partnership opportunities with the Anchorage School District (ASD) are also expanding. Over the past year, the Forest Service has partnered with ASD to provide an "outdoor classroom" for hundreds of school children. Field trips are led along the Trail of Blue Ice and at other trails and sites in valley.

Along with the increase in public recreation use, incidents of trapped domestic animals have also increased. In particular, our staff has responded to numerous incidents of trapped dogs along the Trail of Blue Ice. The potential for injury to forest visitors is a significant concern—especially with the increase children and other users from Anchorage, who may not have the "woods knowledge" of how to safely recreate areas also popular for trapping.

The Board of Game has already recognized the importance of visitor safety in Portage Valley. For this reason, the area is currently closed to hunting. Public safety could be further improved with adoption of proposal 177. While this proposal would close the area of portage valley—an area with the highest potential for user conflicts, it still maintains trapping on the north side of Portage Creek—an area without developed recreation sites and one more difficult for the general public to access. As such, the proposal provides the appropriate balance between insuring visitor safety, while maintaining trapping in areas with less potential for conflict.

Last, we would be glad to work cooperatively with the Department of Fish and Game to help implement these changes in Portage Valley.

Sincerely,

TIM CHARNON
Glacier District Ranger



Proposal 147

My name is Chris Kostelecky & I am an avid hunter who has lived in Kodiak for more than 20 years. I also have family who has lived in Kodiak for more than 30 years. Over that course of time we have hunted with rifles, shotguns, bows, handguns as well as muzzle loaders, and we have enjoyed the bounty of moose game Alaska has to offer.

Today I come to you as an archery hunter, with respect for the tough decisions you must make for all. I hold an Alaska Department of Fish & Game IBEP card. To receive this certification I attended a one day class with exercises in responsible hunting, conservation, as well as ethical hunting practices. We were tested with a 125 question exam, followed by a proficiency shoot, to demonstrate range calculation, accuracy and up & down hill shots. None of which is required for most of the rifle hunting General Public.

To hunt Elk in Alaska, (of which I can't remember more than 2 years in 20 that I haven't hunted Elk), you must go to great lengths to access these animals, which on Afognak have grown from 8 original animals to more than 800. True Testament Too Success! Hunter success harvesting Elk, (by Kodiak ADF&G statistics) however is typically less than 25%.

(If you ask my wife the figure drops south of 5% in my case) Since GMU8 has NO archery (ONLY season these statistics are for rifle hunters). Typically speaking bow hunting success is much lower than rifle hunters. This allows more tags to be issued, keeping more hunters afield, while the herd grows

Over the years I have saved hunting supplements to compare from year to year what number of hunts, permits and regulations change. I have seen an archery hunt for GMU3 Elk hunting develop; this hunt has not in any way affected populations negatively with a season that has evolved to include all of September (based on steady permit growth from 70 to 125 tags currently, beginning Sept 1.).

This is not the case for GMU8, with NO archery only season and predominately no September hunting. As the numbers have ranged (in the same 9 year period), up & down From 10 tags to 146 on Raspberry Island and 225 -500 tags on Afognak, Island. This Also does not reflect the Registration portion of Elk hunts used as a "Clean-UP" By ADFG on Afognak Island. This is a different picture from GMU 3's CERTIFIED ARCHERY HUNT slow & steady growth in the # of drawing tags awarded.

In summation it would seem only right to allot a percentage of these Elk tags to a group of sportsman that relish the challenge of an age old tradition, took the time to be trained and earned this certification by the ADF&G / IBEP, unlike most rifle hunters with no hunter education requirements. Two years ago a similar proposal was discussed and the ADFG biologists did not come out in support of the proposal, this was based solely on low population of our herds. Archery has been used a successful management tool in many states as well as Alaska to increase animal population and keep responsible hunters in the field. Our schools are starting archery in the schools program and this proposal would provide a great safe hunt for us to pass the traditions down we all enjoy. We are merely asking for an allotment of tags not an increased harvest.



It seems to me the game is managed well-it's the people you are having difficulties managing. Hence more regulation...

Thank you for your support of Bow hunters in Alaska

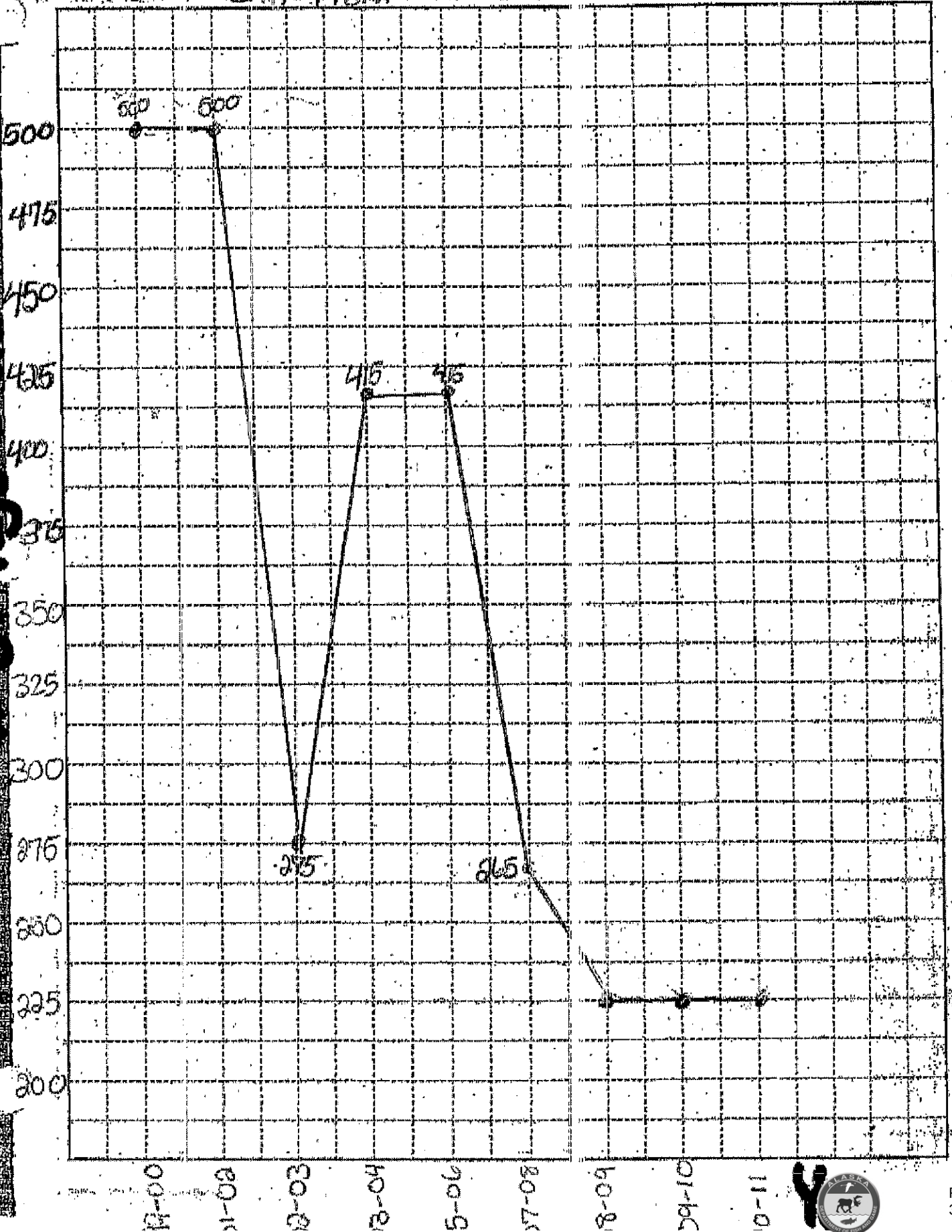


Student Math Journal

NAME Chris Kostecky

DATE _____

TITLE Game Management Unit 8 Afognak Island Elk Hunt

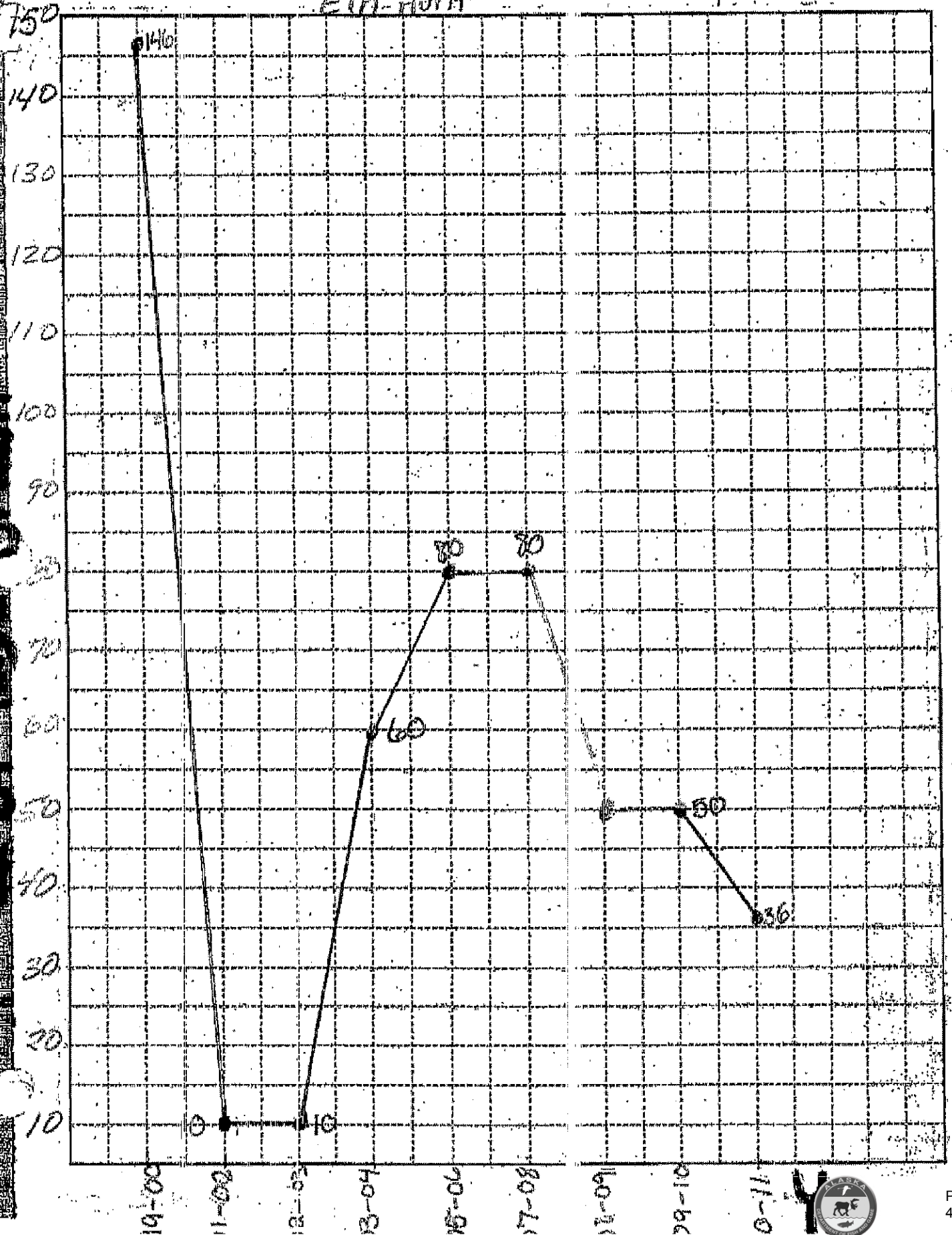


Student: Math Journal

NAME Chris Kastelecky

DATE _____

TITLE Game Management Unit 8 Raspberry Island Elk Hunt



**GAME MANAGEMENT UNIT 8
ELK PROPOSAL**

5 AAC 85.035

**Game management unit 8
Raspberry, Southwest Afognak,
East Afognak and Remainder Elk
hubs. One Elk by permit archery
only September 1-September 30th**

**Chris Kostecky
P. O. Box 2383
Kodiak, AK 99615
(907) 486-9446
Kostecky@ak.net**



**GAME MANAGEMENT UNIT 8
ELK PROPOSAL**

5 AAC 85.035

**Game management unit 8
Raspberry, Southwest Afognak,
East Afognak and Remainder Elk
hunts. One Elk by permit archery
only September 1-September 30th**

**Chris Kostecky
P. O. Box 2383
Kodiak, AK 99615
(907) 486-9446
Kostecky@ak.net**



Support Proposal #177
sit TRAPPING IN PORTAGE
WE NEED TO KEEP THE
WILDLIFE IN THIS VALLEY

POSSIBLE TO BOTH
S AND VISITORS. THANK YOU
KEVIN DESMOND
PO BOX 830 GIRDWOOD, ALASKA
99507



RECEIVED

DEC 30 2010

Carol Jo Sanner
P.O. Box 218
Girdwood, AK 99587

BOARDS

December 27, 2010

**Re: In Support of
Proposal 177:**
Trapping Closure in
Portage Valley

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

Ladies and Gentlemen of the Board:

I would like to express my support for **Proposal 177**, to close all or portions of Portage Valley (within GMU 7) to all trapping for the following reasons:

As a search dog handler I have responded many times in summer and winter to lost or missing persons in the backcountry and for avalanches in the front range of Chugach State Park and the Chugach National Forest, south of Anchorage. I and most of my colleagues who train search dogs routinely train in these areas because of the frequent search callouts there. It is important for our dogs and us to be familiar with the terrain in which we are frequently called to search.

About 5 years ago, my dog and I had an experience that speaks to the risks our SAR dogs experience during training and on search missions in areas open to trapping. My dog was caught in 2, #3 coil spring traps- perhaps a lynx or coyote set- within 50 feet of an access road at the Chugach Electric Substation near Quartz Creek off the Sterling Highway. This was located on a State Material site within the National Forest. On that occasion, the dog was not seriously injured. If it had been a snare or a #4 trap, one used for larger animals such as wolverines or wolves, it would have surely had more tragic results.

The front page of the trapping regulations advises trappers to avoid recreational areas and trail heads. Item number 3 of the Trappers'



Code of Ethics says "Promote methods that reduce the possibility of catching non-target animals." However, in my years of winter backcountry travel and work as a wildlife-fisheries biologist along the Portage, Seward, and Sterling Highway systems, I find traps and snares set near roads and trails all the time by lazy trappers who do not abide by the Code of Ethics. By the time one's dog (or worse-one's child) gets caught, injured or killed, enforcement is a moot point. Therefore, I find the idea of voluntary trail setbacks an unenforceable illusion.

Since our dogs must work and train off lead, areas where trapping is allowed are undesirable to train or to respond to State Trooper search callouts. SAR dogs inherently deal with many hazards when training and working, but this is one where management can reduce the risks to handlers and dogs. The Board should consider this aspect of public safety in its fervor to protect "recreational trapping" opportunities our State Parks and National Forests.

I may speak for other SAR dog handlers – and probably law enforcement K9 handlers- when I say that if called to perform a search during trapping season in CSP or Chugach National Forest where trapping occurs, I will have to seriously weigh whether to expose my dog to the risk of being maimed or killed in a trap versus finding a lost or missing person.

In Portage Valley, the Forest Service has spent many tax dollars to construct year round recreational facilities- trails and ponds that are used for fish and wildlife habitat, skating, nature interpretation, wildlife viewing, etc. Having been a trapper myself, I respect trapping as one of many multiple uses of public lands. But not all uses are compatible in the same areas and Portage Valley's primary management goal is to promote non-harvest recreational activities. Trapping where non-consumptive recreational uses are dominant is an incompatible use-period.

There are only one or two recreational trappers who would be impacted by a closure in Portage Valley, relative to the hundreds of fall and winter outdoors people who want to take their dogs and children on the Trail of Blue Ice or along Portage Creek or skating and ice fishing on the ponds. Those of us who want to work and/or train our dogs (and hunting dogs would be included) off lead deserve to be able to utilize these areas without fear.



Furthermore, I want to emphasize that minor setbacks for trapping are virtually unobserved and unenforced. The evidence seems to be that trappers do not observe best safety practices. On December 22, 2010, yet another dog was caught in a trap, not 20 feet from a Forest Service campground parking lot in Portage Valley. The trap line was unmarked.

A total closure to trapping is the best management option for this area. I would recommend the closed area boundary be south of the Alaska Railroad to Bear Valley all the way to the eastern shore of Portage Lake and east of the Alaska Railroad (at the entrance to Portage Valley). This leaves all the Placer and Twentymile drainages open for trapping, as well as the remainder of Portage Valley north of the railroad.

Thank you for your consideration of this proposal.

Sincerely,



Carol Jo Sanner



LOG NUMBER: EG110310148

PROPOSAL 177 - 5 AAC 92.550. Areas closed to trapping. Close a portion of Unit 7 to trapping.

Close Portage Valley floor south of Portage Creek to all trapping.

ISSUE: I would like the Board of Game to close trapping in Portage Valley, south of Portage Creek to the toe of the mountain slope (the valley floor south of portage creek). This request is made because of the increase in public use during the trapping season and the increase in the numbers of traps seen close to popular trails. The Forest Service has constructed a trail from Portage Lake to about 1.5 miles in from the Seward Highway that is becoming more popular as a ski trail. Many people feel their dogs should be able to be on voice control while they recreate, and trap often have odors that entice dogs...then a dog gets trapped, the people get mad, trapping gets a bad rap. There are plenty of places where there are no trails for trappers to trap, where people with pets will not normally be.

WHAT WILL HAPPEN IF NOTHING IS DONE? Dogs will continue to be caught, and people may get injured trying to deal with them. Potential for children to get caught as well.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED? No.

WHO IS LIKELY TO BENEFIT? Non-trapping recreationist in Portage Valley.

WHO IS LIKELY TO SUFFER? Trappers that like the easy "drive-in" trapping available to them in Portage.

OTHER SOLUTIONS CONSIDERED: 1.) Close all trapping statewide - I doubt this would go very far; 2.) Close all trapping within 1/2 mile of any trail - too hard to enforce; 3.) Require trappers to post exactly where they have traps, require this info be posted at all trailheads in Portage during the trapping season - trappers probably do not want other people to know exactly where their traps are, enforcing this would require additional work, but if it is possible, then go for it!

PROPOSED BY: Alison Rein

LOG NUMBER: EG10071093

PROPOSAL 178- 5 AAC 92.540. Controlled use areas. Allow the use of motorized vehicles in Unit 15C to retrieve meat.

No motorized vehicles except to retrieve meat (moose).



Margaret Tyler
PO Box 718
Girdwood, AK 99587

January 6, 2011

RECEIVED
JAN 14 2011
BOARDS

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

RE: Support of Proposal 177

Members of the Board:

I would like to express my support for **Proposal 177**, to close all or portions of Portage Valley (within GMU 7) to all trapping.

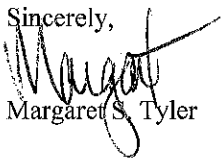
I am an avid user of our trail systems and often hike with my family and dog in Chugach State Park and the Chugach National Forest. I am aware that there are areas that trapping is permitted within the areas that we recreate and enjoy the scenery. We use the area year round – hiking, biking and camping in the summer, walking, skating and skiing in winter. It is wholly unacceptable to me that trapping is legal within the area easily accessible to non-consumptive users of the area.

As a user of the trails and waterways in this region, I am excited at the significant effort and funds the Forest Service has put in to the trails and facilities in the Portage Valley. The “Trail of Blue Ice” and campgrounds will provide many great opportunities to Alaskan families as well as to tourists from outside the state. It is an excellent venue for people who seek a light adventure – families who are camping with kids, grandparents, and pets - to experience Alaska without fear for life and limb.

I do not believe that a “code of ethics” adequately protects other users of the public lands from a catastrophic encounter with a trapper’s equipment. Truly, a total closure to trapping is the best management option for this area. I would recommend complete closure of the Portage Valley. Trappers will still have Placer and Twentymile drainages open to them – areas that are not easily accessible for casual users as Portage Valley.

Thank you for your consideration of this proposal. I appreciate your attention to this matter.

Sincerely,


Margaret S. Tyler



RECEIVED
JAN 11 2011
BOARDS

William Lazarus
PO Box 421
Girdwood
Alaska 99587

January 5, 2011

**Re: In support of Proposal 177:
Trapping Closure in Portage Valley**

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

To the Board,

I would like to support the closing of Portage Valley to trapping. I have lived in Girdwood for the past 30+ years, as well as, working in Portage Valley for Portage Glacier Cruises as an Engineer/ Relief Captain. I have seen over the years how the valley is used for recreation and believe Trapping is not consistent with the goals for its intended recreational purposes.

The US Forest Service has recently finished another phase of the "Trail of Blue Ice" and it has been used extensively by Tourists and locals alike, for hiking, skiing and wildlife viewing, winter and summer. I have personally had my dog(s) caught in traps set way too close to the trail, the traps not having the required marking. Although they were probably legal set(s), it just is not compatible with the type of recreational use the trail was intended for. This could well have easily been a small child. Most of my friends have had their dogs caught as well.

The adjacent Placer and Twentymile Valleys offers many more miles of terrain for trapping, as well as waterways and winter trails for access. It just doesn't make sense to have traps set in a recreational area when there are alternatives so close by.

Thank you for your consideration in this matter.

Sincerely


William Lazarus



Jonnie Lazarus
PO Box 421
Girdwood, AK 99587

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

RECEIVED
JAN 03 2011
BOARDS

RE: IN SUPPORT OF PROPOSAL 177

December 30, 2010

Dear Board Members:

This letter is to express my **support of Proposal 177**, to close all portions of Portage Valley (within Game Management Unit 7) to all trapping.

As a long time resident of Girdwood, I have enjoyed the recreational facilities in Portage Valley through every season, often with the family dog. In the past, I have been one of the unlucky ones to have a dog caught in a trap. Luckily, it didn't damage my pet, but one of reasons she was released with little injury was due to our quick response and the dogs' reaction to the trap (she just stayed still). The trap was not far off the trail and we noticed that she had disappeared in a short time, as she typically stayed close. When we called we got no response from an otherwise obedient dog. We quickly discovered her in a trap that was set far too close to a trail. Sadly, we are not the only ones who have experienced finding a pet in a trap. While most of the time, the dog has not been greatly injured, the trauma to both the pet and the owners is great.

If the setback for trapping were observed and/or enforced, this would likely not be a big issue; however this is not the case. The Forest Service has invested a great deal of money to improve the recreational facilities in Portage and trapping in the valley seems to be at odds with improved recreation. While I have only had a dog caught in a trap, it seems that it could easily be a child.

Total closure to trapping is a best management option for this area and should be considered by the board. Thank you for your consideration of support for this proposal.

Sincerely,

Jonnie Lazarus
Jonnie Lazarus



January 18, 2011

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

Proposal 54 – 5AAC 85.055 hunting seasons and bag limits for Dall sheep; and 92.171. Sealing of Dall sheep horns. Eliminate the horn sealing requirement for sheep in Unit 13.

I am in opposition to this proposal.

The Fish and Game regulations clearly state how to identify a legal ram and define a legal ram under full – curl regulation. Biologists and Fish and Wildlife employee's checking rams shall be able to tell a legal ram from an illegal one. The regulations state, "it is difficult and risky to age a ram in the field by counting horn rings". If a ram is clearly not full curl a hunter, guide has to be 100% sure it is 8 years old or has tips of both horns broken before harvesting sheep. If they are not 100% sure it is a legal sheep they should not shoot. If they do they deserve to be prosecuted to full extent of the law.

The problem here is not with the biologists and Fish and Wildlife but with the guides and non residents harvesting illegal rams. It does not matter how much money nonresident dall sheep hunters bring into the state. The regulations are for everyone to follow. Not sure do not shoot, period. Sealing is a good thing. Illegal nonresident harvesting needs to go away.

Proposal 79 – 5 AAC 85.040. Hunting seasons and bag limits for goat. Change the goat drawing hunt in Unit 14A to registration hunt.



Change DG 866 back to registration hunt limited to residents only

I support this proposal. Residents deserve a place they can hunt goats without having to compete with non resident guided hunters. The 14A area is close to road system and can be an affordable hunt for residents. There are other areas open for goat hunts in the state for non residents.

Proposal 80 – 5AAC 085.040(7). Hunting seasons and bag limits for goat. Amend this regulation as follows:

I oppose this amendment as written.

I do not believe non residents should have the opportunity to hunt the goats in the early season. Non residents should be only allowed to hunt the October 1 – 31 registration season.

Making unit 14A a resident registration goat hunt area for September 1 – October 31 and a nonresident registration hunt October 1 – October 31 could work for the harvest.

Proposal 81 – 5AAC 85.040 Hunting and bag limits for goat. Change the Unit 14A goat drawing hunt to a registration and split it into two hunts.

I oppose this proposal.

I agree that the area should be returned to a registration hunt. I do not agree that the hunt should be offered to non residents at the same time as residents. Divide the hunts so residents can hunt from September 1 – October 31 and nonresidents from October 1 – 31.

Proposal 115 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Modify the Dall sheep hunts for all Region IV Units.



I support this proposal.

The drastic decline of sheep in the region needs to be addressed . There is no need to harvest ewe's . Area should be residents only. Non residents have other areas of the state to hunt sheep. Residents should have the priority to the accessible areas for these hunts.

Proposal 116 – 5AAC 85.055. Hunting seasons and bag limits for Dall sheep. Change the horn restriction for Dall sheep in Units 13D and 14A.

All sheep drawing permits should be issued under current full curl regulations.

I support this proposal.

The any ram designation should be removed from these areas. Better for Dall sheep and hunters will harvest mature animal.

Proposal 117 – 5 AAC 85.055 Hunting seasons and bag limits for Dall sheep. Introduce a late season archery registration hunts in all sheep drawing areas in Region IV.

I oppose this proposal.

If there was going to be a late archery registration hunt conducted in Region IV it should be for residents only. The Region IV area has low legal sheep numbers now. I do not agree that we should add more hunts, especially to non residents when we are trying to help the sheep rebound in this area.

Proposal 118 – 5 AAC 85.040. Hunting seasons and bag limits for goat. Require guide – client agreements for goat hunts Units 13D, 14A, & 14C.



I oppose this proposal.

If guide – client agreements become required in the above mentioned GMU's drawing permit and registration hunts. Would it not be the right thing to do to require them in all the units that goat's are hunted! All or none.

Would be nice if game board would be consistent with requirements. Example: Non resident Kodiak brown bear hunters required to have agreements. Some, not all sheep hunts need agreements, Unimak Island Brown/ grizzly hunt needs one, some nonresident moose hunts.

Why do some need agreements and some do not for same species?

What is difference in hunting brown bear on Kodiak or Alaska Peninsula? What is difference from hunting dall sheep in GMU's 12,13C, 13D, 20D,14A, 14C where guide/client agreements are required and GMU's 7,15A, 20D,13B,20A, 20E, 20D, 23,and 26A where they are not required?

Proposal 133 – 5AAC 85.055. Hunting seasons and bag limits for Dall sheep. Modify the Dall sheep hunt in Unit 14C.

I support this proposal.

I agree that the area is mostly state park and residents should have the priority in harvesting the resources available. There is a drastic decline in harvestable sheep ram numbers in the area. What harvestable sheep are available should be for resident hunters and nonresidents should not be allowed to apply for the limited draw permits. There are other areas of the state open for non residents. I believe there is no need to harvest ewe's. Restricting the sheep harvest to residents only will help the sheep population and provide a hunting opportunity for resident hunters that has been dominated by nonresident guided hunters in the past creating the decline of harvestable sheep in GMU 14C.



Proposal 134 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Close Unit 14C to nonresident sheep hunting.

I support this proposal.

I agree that hunting for Dall sheep in Unit 14C should be for residents only, except for the Governor's tag.

Area is affordable for residents to access and it is mostly state park lands . The sheep population has been overharvested in past years by guide operations. It is time that the non resident hunters are removed from being able to hunt this unit and allow resident hunters to hunt in their state park lands. When the resources are limited the residents should be the ones offered the hunting opportunities not nonresidents.

Proposal 135 – 5AAC. 85.040. Hunting seasons and bag limits for goat. Open a registration goat hunt in Unit 14C.

I support this proposal.

A registration hunt for residents and non residents could be combined. The Eklutna River, Eagle River , Bird Creek, Glacier Creek areas could be changed from drawing permit hunts to registration hunts. Leave the TwentymileRiver/Lake George hunts as they are.

Proposal 136 – 5 AAC 85.040. Hunting seasons and bag limits for goat. Open a separate goat registration hunt for nonresidents in Unit 14C.

I support this proposal.



The residents have not been meeting harvest quota's. Allowing nonresident hunters to have their own registration goat hunt in addition to the resident hunt at the same time makes sense.

Gary Munoz
Registered Guide # 743
Palmer, AK



Oppose Proposals 193, 194

1 of 1

Cynthia Lietzau
20508 Mark Circle
Chugiak, Ak. 99567
1/16/11

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

Dear Honorable Board Members,

I urge you to carefully consider the comments below regarding the upcoming Southcentral and Central/Southwest Proposals and to act accordingly in the best interests of all of the people of Alaska:

OPPOSE PROPOSAL 193 - 5 AAC 85.065.**Hunting seasons and bag limits for small game.****Modify the bag limits for waterfowl in Region II and Region IV.**

I hunt ducks in the Seldovia area and I can attest that there are plenty of waterfowl species and numbers including both Common and Barrow's Goldeneyes. They are plenty and the populations look healthy to me. I would not want any sea duck or puddle/diver duck species limits decrease without an Alaska Department of Wildlife sanctioned scientific study done to research the need to decrease bag limits. Do not decrease bag limits on our waterfowl resources.

OPPOSE PROPOSAL 194 - 5 AAC 85.065.**Hunting seasons and bag limits for small game.****Change the regulations for waterfowl in Region II and Region IV.**

Please do not make any changes in your small game bag limits with out a state sanctioned scientific study first and then only if warranted buy the results of such a study.

Sincerely,
Cynthia Lietzau



Oppose Proposals 193, 194

1 of 1

Donald Lietzau
20508 Mark Circle
Chugiak, Ak. 99567
1/16/11

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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Modify the bag limits for waterfowl in Region II and Region IV.

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OPPOSE PROPOSAL 194 - 5 AAC 85.065.

Hunting seasons and bag limits for small game.

Change the regulations for waterfowl in Region II and Region IV.

Please do not make any changes in your small game bag limits with out a state sanctioned scientific study first and then only if warranted buy the results of such a study. Thank You. Don Lietzau 907-227-4261

Sincerely,
Donald Lietzau



RECEIVED

JAN 20 2011

Dear members of the Alaska Board of Game,

Thank you for your time and attention to my input regarding proposals 193 and 194. Proposal 193 seeks to reduce the bag limit for either species of goldeneye from 7, 8, or 10 per day and 21, 24, or 30 in possession (depending on GMU) to 2 per day, 6 in possession for all of region II and IV. Proposal 194 addresses a rule change to guided duck hunting in region II and IV, but does not give any specific suggested changes.

These proposals, while well written, are full of irrelevant and highly questionable data. To start off my argument, I submit to you the latest available hunter harvest statistics available from the U.S. Fish and Wildlife Service. The total combined harvest of both species of Goldeneye (Common and Barrow's) in the state of Alaska for the year 2007 was 2696 total birds. In 2008, the total combined harvest was 4647 total birds. According to the USF&WS sea duck joint venture, the estimated population of Common Goldeneye is about 1 million ducks. The estimated population of Barrow's Goldeneye is from 200,000 to 250,000 ducks. The total combined species harvest in Alaska is less than a single percentage point of the population. Hopefully this will give us an idea of the overall impact of guided and unguided duck hunting in Alaska.

Proposal 193 states: "Barrow's goldeneye have the lowest population densities of any of the other hunted 'ducks' in this general duck bag limit, yet in Alaska Game Management Units the take on these birds is not differentiated and is still set at 7-10 per day, 21-30 in possession for 107 days, for the 5000 waterfowl hunters in Alaska as if their numbers were in the millions of ducks". Apparently this suggests that there is a free for all for the entire duck season on Barrow's Goldeneye. But if you do the math, even at the lowest daily bag limit, (7) the statewide harvest would be 3,745,000 birds. Clearly, that is not happening. The reality of the matter is that goldeneye don't really migrate into south central Alaska until the beginning of November at the earliest. The two guiding services that I am aware of, in Seldovia and in Valdez, don't begin offering hunts until then. Add to that the relative difficulty of accessing the birds...you can't drive out to the middle of Kachemak Bay and start hunting. A fairly substantial boat is required, in addition to fair weather. What you wind up with is about five weekends in November and December where a few hunters, certainly not all 5000 of them, can expect to successfully hunt Goldeneyes.

The proposal goes on to state: "There is an east coast and west coast population of Barrows goldeneye. In the state of Maine, Barrows goldeneye are a threatened species under the Maine Endangered Species Act, so the season is closed. In Eastern Canada, Barrows are on the list of Conservation concern. There are indicators of vulnerability". The USF&WS sea duck joint venture states "there is no evidence of exchange between the eastern and western populations". In short, the 4647 birds harvested in Alaska in 2008 have absolutely nothing to do with what is happening in Maine. I have to argue that the proposal's point is irrelevant.

The proposal goes on to mention: "Canvasback in Alaska with well over double the population density of Barrows goldeneye is logically and prudently set at not more than 1



canvasback per day, 3 in possession". What the proposal fails to mention is that first of all, the canvasback daily/possession limit is set at the federal level by the USFWS, not the state of Alaska. Secondly, canvasbacks can be found throughout North America, in all four flyways, from Alaska to Florida. They face far more than the 5000 duck hunters in Alaska. Barrow's Goldeneye on the other hand, are a far more regional bird. I again cite the sea duck joint venture: "Hunting pressure on the western population is generally low. Sport harvest is estimated at less than 5000 birds, mostly from Alaska, British Columbia, and Washington". In short, comparing Canvasbacks to Barrow's Goldeneye is like comparing apples to oranges. There is nothing relevant here.

The proposal cites the publication "Gunning for Green Heads in the new Millenium" to state: "with jump shooting and pass shooting, the crippling rate is 60%. This number is not counted in harvest estimates". Now that is a sobering statistic. You're kidding right? This publication is not a peer reviewed, scientific publication of any sort. If you haven't read it, it is a general guide for introducing newcomers to waterfowling. The claim is intended to encourage newcomers to hunt ducks over decoys, rather than try the generally less successful techniques of jump shooting and pass shooting. For the record, in my personal opinion, nobody in the history of the world has ever jump shot a Goldeneye. Jump shooting is a technique used where a hunter quietly sneaks through a marsh and surprises unsuspecting ducks, then fires on them when they take flight. The proposal never addresses hunting ducks over decoys, where shots are typically 20-35 yards; lethal shotgun range. The point of the proposal is to horrify and lead people to believe that there are wounded ducks scattered throughout the state of Alaska, but has absolutely NO data to back up the claim. Seriously, if the crippling rate was really 60%, who would bother?

The final dubious claims I'd like to address in prop 193 are the claims that: "The status of the Alaska Yukon Waterfowl breeding population estimate show goldeneye species to be down -42 percent from the 10 year mean and down -42 percent from the long term mean". No source is given for this statistic, draw your own conclusion. I refer again the sea duck joint venture which states: "population trend is believed to be stable on both the east coast and west coast". The proposal also states that godeneye harvest has gone up "over 150 percent". Again, no source is given. Other than the harvest statistics from the USFWS, this statement should be viewed with skepticism.

Proposal 194 doesn't give any specific guidance, but does seem to target guided sea duck hunting in regions II and IV. It makes claims of "removing biomass bay by bay" which is ridiculous. Ducks are migratory. What happens in one bay has zero impact on the overall health of a species within a flyway, which includes three countries, and in the case of the Pacific flyway, eight states. Given a six week period to hunt, weather dependant, a guide outfit can't even scratch the surface, assuming that he/she wanted to. It is simply not in a guide's interest to wipe out all the ducks in the area they hunt.

On a personal note, I was at the BOG meetings last year when proposal 52 was being discussed. I came away with a new understanding: sea duck hunting suffers from an image problem. Many members of the Board had a terrible image of a boatload of guys



going out on a boat with a half ton of ammunition and killing every duck in sight, then picking the “best one for the wall” and leaving the rest to rot. I can’t honestly tell you that that never happened, but on the other hand, I haven’t heard of any tickets being written or arrests being made for such a blatant violation of existing wanton waste laws. There was concern of a hunter going out for one particular duck (Harlequin duck was the example used) and killing a daily limit of them, then picking the best one and discarding the rest. Honestly, this is NOT A FAIR ASSUMPTION. Why is there such an assumption of wanton waste when it comes to sea ducks? Many people I know don’t care for the taste of caribou. Is it safe to assume then that most hunters kill a caribou, saw off the antlers, and leave the meat to rot? Of course not. We have a constitutional right to be considered innocent until proven guilty in the U.S., and to assume that any hunter going after sea ducks is guilty of wanton waste before the fact is simply not fair.

In addition, we have all been treated to horrible pictures of dead ducks floating around in the sea and heard stories of “the duck in the dump”. I feel compelled to point out a truism here: the duck in the dump or the duck floating around in the sea that has had the edible meat removed from it is NOT an example of wanton waste. One may object to the method of carcass disposal, but that is a different matter altogether. After a successful hunt, there will be a carcass to dispose of, whether we are discussing a Goldeneye in Kachemak Bay or a moose in the Brooks Range. Wanton waste is an enforcement issue, period. It is ridiculous to think that any individual that would ignore wanton waste laws would suddenly become a forthright, law abiding citizen and recognize a reduced bag limit. A reduced bag limit would only succeed in reducing opportunity for honest, law abiding hunters.

In summary, let’s just call this what it is: an anti-hunter submitting anti hunting proposals in an effort to stop duck hunting “in my front yard”. Carrying this proposal sets a dangerous precedent. Anybody who hopes for sound, scientific, fact based wildlife management has a stake in this. This proposal must not be carried given the distorted, dubious, and simply false claims and assumptions that it contains. I have personally hunted in Kachemak Bay both guided and unguided. When I have hunted with a guide, it was because I simply do not own the necessary equipment to properly and safely hunt on big, open water. The fact that I hunted with a guide does not mean that I committed wanton waste, depleted any bays of ducks, or “caused excessive crippling”.

Alaska’s wildlife is managed for the benefit of all users. I submit to you one final quote from proposal 194: “Landowners like me will benefit because possibly the rafts of birds that were depleted years ago by commercial guided hunting parties in front of my home will be allowed to grow back in the remote bay I have lived in for the past 32 years and I will once again be able to see them, hear them, and enjoy them in my front yard which is why I live remote”. This sets a dangerous precedent; using the Board of Game to pit landowners against hunters. If every landowner in the state decides that they want a refuge within a certain radius of their land, and it is given to them, then we Alaskans will have lost a way of life that sadly, is pretty unique to Alaska. We must not carry this proposal. Thank you for your time and consideration on this matter.

Tyler Welker
Anchorage



ADF & G

Proposal 177

RECEIVED

JAN 27 2011

BOARDS

Jan 2, 2011

I support 177 to close trapping to part of Unit 7
& ALL areas in urban areas of the
state. I know of 2 dogs killed in traps
& I will NOT take my dogs in these areas.

City 8-5 people DO NOT check their
traps daily so - if the targeted animal
is caught they will die a SLOW &

Horrible death!!!

NO TRAPS

DeeDee Saugh
ANC AK

RECEIVED

JAN - 5 2011

DEPT. OF FISH & GAME
COMMISSIONER'S OFFICE



Andrew Ramey
4200 Crannog St.
Anchorage, AK 99502
16 January 2010

RECEIVED
JAN 23 2010
BOARDS

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

Board Members,

I urge you to carefully consider the comments below regarding the upcoming Southcentral and Central/Southwest Proposals and to act accordingly in the best interests of all of the people of Alaska:

OPPOSE PROPOSAL 193 - 5 AAC 85.065.

Hunting seasons and bag limits for small game.

Modify the bag limits for waterfowl in Region II and Region IV.

As currently written, Proposal 193 would lower bag limits on Goldeneye species throughout much of Alaska, presumably reducing hunter harvest. However, I believe Proposal 193 to be fundamentally flawed through an incomplete and potentially inappropriate use of biological data and hunter harvest estimates. Furthermore, I believe that Proposal 193 would unfairly reduce harvest opportunities for Alaskan hunters without sufficient evidence that changes to current management regulations would have any positive impacts to Goldeneye populations. I would now like to provide additional evidence for fatal flaws in Proposal 193 as currently written.

Proposal 193 argues for lowering bag limits based on life generalized life history characteristics of Goldeneye species and population trends and estimates from unidentified sources. Although I agree with the statement that Goldeneye species are generally long-lived, K-selected waterfowl species, the authors fail to clearly cite any peer-reviewed scientific studies to support their claims with regard to population estimates and trends. Without full transparency of study design and statistical methods used to derive these numbers, the biological data presented should be viewed with skepticism. Furthermore, the authors of Proposal 193 present biological data for North



American waterfowl populations and apply these data to the management of Alaska waterfowl populations which I argue to be misguided. For example, the authors state that, "Barrows goldeneye have the lowest population densities of any of the other hunted "ducks" in this general duck bag limit". This density metric might be true when applied to all of North America, but almost certainly does not apply to the state of Alaska. For instance, Barrows Goldeneye have much higher population densities within coastal management units of Alaska as compared to other species listed on Proposal 193, such as Redhead. According to the data presented in Proposal 193, there are currently around 1.1 million Redhead subject to harvest under current State harvest regulations. In reality, most Redheads breed in the prairie pothole region of Canada and the lower 48 and never migrate to Alaska. Only a relatively small number of redheads occur in interior regions of Alaska and only during a relatively short breeding season. Therefore, it could be argued that the density of Barrow Goldeneye is actually much higher than Redheads in virtually all of the hunting management units to be impacted by Proposal 193 for most or all of the legal waterfowl sport hunting season. Similarly, the authors cite the protected status of populations of Barrows Goldeneye in northeastern North America as a sign of population vulnerability. However, these populations of Goldeneye have no migratory connectivity with Alaska and therefore have no relevance to the proposal under consideration.

Additionally, the authors of Proposal 193 use hunter harvest information from unspecified sources to make misleading and unsupported claims. For instance, the authors cite the total number of Alaskan waterfowl hunters, the daily bag limits of goldeneye, and the number of days in the legal waterfowling sport hunting season to imply the potential for overharvest of Goldeneye species (i.e. " the take on these birds is not differentiated and is still set at 7 - 10 per day, 21 - 30 in possession for 107 days, for the 5000 waterfowl hunters in Alaska as if their numbers were in the millions of ducks"). However, the authors fail to recognize the fact that there are relatively few Alaska waterfowl hunters targeting Goldeneye in Alaska as evidenced by the fact that the total Alaska take in 2007 and 2008 was < 0.5% of the total estimated population of Goldeneye per year (Raftovich et al. 2009). The authors later claim that mortality on shot and unrecovered birds may be as high as 60%. However, the reference used in Proposal 193 is not to a peer-reviewed scientific source, nor does it apply to the primary method used to harvest Goldeneye (i.e. shooting over decoys).

Finally, nowhere in Proposal 193 do the authors provide any support for the premise that limiting the opportunity for Alaskan hunters to harvest Goldeneye species would have any impact on populations in Alaska or across North America. Hunter induced mortality on waterfowl populations has long been considered by wildlife management professionals to be compensatory and should therefore be assumed to be true in making sound management regulations unless disproven by proper scientific investigation.

In conclusion, I hope the Board of Game will take these comments into consideration and ultimately decide to oppose Proposition 193. This proposal would negatively impact the



opportunity of countless waterfowl hunters across the State to harvest Goldeneye species without any substantiated evidence that a change in management regulations would have beneficial impacts to Goldeneye populations in Alaska or across North American.

Best regards,



Andrew Ramey

Raftovich, R.V., K.A. Wilkins, K.D. Richkus, S.S. Williams, and H.L. Spriggs. 2009. Migratory bird hunting activity and harvest during the 2007 and 2008 hunting seasons. U.S. Fish and Wildlife Service, Laurel, Maryland, USA.



Andrew Ramey
4200 Crannog St.
Anchorage, AK 99502
18 January 2010

RECEIVED
JAN 20 2010
BOARDS

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

Board Members,

I urge you to carefully consider the comments below regarding the upcoming Southcentral and Central/Southwest Proposals and to act accordingly in the best interests of all of the people of Alaska:

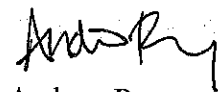
OPPOSE PROPOSAL 194 - 5 AAC 85.065.

Hunting seasons and bag limits for small game.

Change the regulations for waterfowl in Region II and Region IV.

As currently written, Proposal 194 is unclear as to specifically how management regulations should be changed. No evidence is provided in Proposal 194 for claims made regarding commercialized and sport hunting including that these activities are leading to localized depletion of resources and are a source of excessive crippling and wanton waste. Furthermore, Proposal 194 clearly states that this proposal has been submitted to benefit private landowners (i.e. "Landowners like me will benefit because possibly the rafts of birds that were depleted for 18 years ago by commercial guided hunting parties in front of my home will be allowed to grow back in the remote bay I have lived in for the past 32 years and I will once again be able to see them, hear them, and enjoy them in my front yard which is why I live remote") despite the fact that the wildlife resources of Alaska are public and are to be managed for the common good. The idea of developing separate waterfowl hunting regulations for guided sport hunting should perhaps be reviewed in a future proposal that specifically outlines how regulations should be changed; however, as currently written Proposal 194 sets a dangerous precedent for management of public resources for the benefit of local landowners.

Best regards,



Andrew Ramey



Lance Raymore
8013 E 5th AVE
Anchorage, AK 99504
15 January 2011

RECEIVED
JAN 20 2011
BOARDS

ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
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Dear Honorable Board Members,

I urge you to carefully consider the comments below regarding the upcoming Southcentral and Central/Southwest Proposals and to act accordingly in the best interests of all of the people of Alaska:

OPPOSE PROPOSAL 193 - 5 AAC 85.065.

Hunting seasons and bag limits for small game.

Modify the bag limits for waterfowl in Region II and Region IV.

A significant portion of the information in the proposal about Barrow's goldeneye was cut and pasted from the Sea Duck Joint Venture's species fact sheet. The SDJV does state that more information is needed in order to better manage the east and west coast populations of Barrow's goldeneye. The SDJV states that the west coast harvest areas for Barrows include Washington, British Columbia, and Alaska, with a sport harvest estimated at 5,000 birds, and subsistence harvest at 3,000 birds in Alaska. There is no differentiation in harvest numbers by population areas other than for subsistence in Alaska. The SDJV states that the majority of the population is in central British Columbia, which implies that the Alaska population is low and would not play into a significant impact to the overall west coast population. The SDJV does not see this level of take as significant enough to impact the west coast population. If they did they would be forwarding recommendations to the US Fish and Wildlife Service.

The proposal writer requests that goldeneyes be placed in the sea duck bag rather than the general duck bag. The Alaska Board of Game does not have the authority to do this. The seasons, classification and bag limits for ducks and sea ducks are set by the Federal Government. You would think that an organization called Sea Ducks Unlimited that has been in business since 2002 would know which agency sets seasons, classifications, and bag limits for waterfowl. The seasons, classifications, and bag limits are seldom published within 50 CFR 20, but are published as proposed and final rules in the Federal Register each year. Review Federal Register, volume 75, number 145, page 44868, published 29 July 2010 for the proposed rules that went final sometime in late August 2010.



It is interesting that through out the proposal the proposer states that actual taking of goldeneye is not tracked, but then states that 1/3 of birds – 1/3 of what total amount is not stated - are harvested in Kachemak Bay. The proposer also states that goldeneye harvest is up 150 percent in recent years. If the harvest of goldeneye ducks is not tracked through the hunter information program then how can the proposer know that 1/3 of birds are taken in Kachemak Bay and that the goldeneye harvest is up 150 percent? From whom's rectum is this information extracted?

In looking for information I found the Alaska Department of Fish and Game's presentation to the Board from May of 2009.

<http://www.boards.adfg.state.ak.us/gameinfo/meetinfo/2008-2009/ETC5-19-09/sea-duck-mgmt.pdf>

The presentation shows that sea ducks make up less than 3.6% of the total waterfowl harvest in all of Alaska. It also shows that the harvest of goldeneyes does not even register on the pie chart when compared to the harvest of other sea ducks. In 2009 ADFG found that sea ducks in Kachemak Bay are not discrete stocks and should not be managed as such. ADFG also found that harvest of sea ducks is low when compared to the wintering population and that further regulatory restrictions were not warranted.

I do not recommend that the Alaska Board of Game act on this proposal since the Board has no legal authority to act on part of it (sea duck classification of goldeneyes) and the SDJV as well as the ADFG do not see the current harvest levels has having an impact on the goldeneye population.

OPPOSE PROPOSAL 194 - 5 AAC 85.065.

Hunting seasons and bag limits for small game.

Change the regulations for waterfowl in Region II and Region IV.

It would appear that this proposal would violate the Section 8.3 of the State Constitution. If a resident duck hunter decided to use a guide to hunt sea ducks in the proposer's "front yard" there would be a different bag limit on them than on the proposer. That is not legal and the board has no authority to establish something of this nature.

What the proposer has forgotten is that sea ducks are called migratory birds for a reason. They migrate when there is a change in the environment. Hunting pressure is a change in their environment. It happens every where migratory birds are hunted. Enough pressure and they stop using the area. This is basic animal behavior.



If there is wonton waste of sea ducks then the proposer should be using the current legal system and reporting it to the State Troopers.

Sincerely,


Lance Raymore

Attachments:

Federal Register, Volume 75, No. 145, page 44868

Sea Duck Joint Venture species fact sheet Barrow's goldeneye

Sea Duck Joint Venture species fact sheet common goldeneye



Western Management Unit

Hunting Seasons and Daily Bag Limits:

Idaho, Oregon, and Washington—Not more than 30 consecutive days, with a daily bag limit of 10 mourning doves.

Utah—Not more than 30 consecutive days, with a daily bag limit that may not exceed 10 mourning doves and white-winged doves in the aggregate.

Nevada—Not more than 30 consecutive days, with a daily bag limit of 10 mourning doves, except in Clark and Nye Counties, where the daily bag limit may not exceed 10 mourning and white-winged doves in the aggregate.

Arizona and California—Not more than 60 days, which may be split between two periods, September 1–15 and November 1–January 15. In Arizona, during the first segment of the season, the daily bag limit is 10 mourning and white-winged doves in the aggregate, of which no more than 6 may be white-winged doves. During the remainder of the season, the daily bag limit is 10 mourning doves. In California, the daily bag limit is 10 mourning doves, except in Imperial, Riverside, and San Bernardino Counties, where the daily bag limit may not exceed 10 mourning and white-winged doves in the aggregate.

White-Winged and White-Tipped Doves

Hunting Seasons and Daily Bag Limits:

Except as shown below, seasons must be concurrent with mourning dove seasons.

Eastern Management Unit: The daily bag limit may not exceed 15 mourning and white-winged doves in the aggregate.

Central Management Unit:

In Texas, the daily bag limit may not exceed 15 mourning, white-winged, and white-tipped doves in the aggregate, of which no more than 2 may be white-tipped doves. In addition, Texas also may select a hunting season of not more than 4 days for the special white-winged dove area of the South Zone between September 1 and September 19. The daily bag limit may not exceed 15 white-winged, mourning, and white-tipped doves in the aggregate, of which no more than 4 may be mourning doves and 2 may be white-tipped doves.

In the remainder of the Central Management Unit, the daily bag limit may not exceed 15 mourning and white-winged doves in the aggregate.

Western Management Unit:

Arizona may select a hunting season of not more than 30 consecutive days, running concurrently with the first segment of the mourning dove season.

The daily bag limit may not exceed 10 mourning and white-winged doves in the aggregate, of which no more than 6 may be white-winged doves.

In Utah, the Nevada Counties of Clark and Nye, and in the California Counties of Imperial, Riverside, and San Bernardino, the daily bag limit may not exceed 10 mourning and white-winged doves in the aggregate.

In the remainder of the Western Management Unit, the season is closed.

Alaska

Outside Dates: Between September 1 and January 26.

Hunting Seasons: Alaska may select 107 consecutive days for waterfowl, sandhill cranes, and common snipe in each of 5 zones. The season may be split without penalty in the Kodiak Zone. The seasons in each zone must be concurrent.

Closures: The hunting season is closed on emperor geese, spectacled eiders, and Steller's eiders.

Daily Bag and Possession Limits:

Ducks—Except as noted, a basic daily bag limit of 7 and a possession limit of 21 ducks. Daily bag and possession limits in the North Zone are 10 and 30, and in the Gulf Coast Zone, they are 8 and 24. The basic limits may include no more than 1 canvasback daily and 3 in possession and may not include sea ducks.

In addition to the basic duck limits, Alaska may select sea duck limits of 10 daily, 20 in possession, singly or in the aggregate, including no more than 6 each of either harlequin or long-tailed ducks. Sea ducks include scoters, common and king eiders, harlequin ducks, long-tailed ducks, and common and red-breasted mergansers.

Light Geese—A basic daily bag limit of 4 and a possession limit of 8.

Dark Geese—A basic daily bag limit of 4 and a possession limit of 8.

Dark-geese seasons are subject to the following exceptions:

1. In Units 5 and 6, the taking of Canada geese is permitted from September 28 through December 16.

2. On Middleton Island in Unit 6, a special, permit-only Canada goose season may be offered. A mandatory goose identification class is required. Hunters must check in and check out. The bag limit is 1 daily and 1 in possession. The season will close if incidental harvest includes 5 dusky Canada geese. A dusky Canada goose is any dark-breasted Canada goose (Munsell 10 YR color value five or less) with a bill length between 40 and 50 millimeters.

3. In Units 6–B, 6–C and on Hinchinbrook and Hawkins Islands in

Unit 6–D, a special, permit-only Canada goose season may be offered. Hunters must have all harvested geese checked and classified to subspecies. The daily bag limit is 4 daily and 8 in possession. The Canada goose season will close in all of the permit areas if the total dusky goose (as defined above) harvest reaches 40.

4. In Units 9, 10, 17, and 18, dark goose limits are 6 per day, 12 in possession; however, no more than 2 may be Canada geese in Units 9(E) and 18; and no more than 4 may be Canada geese in Units 9(A–C), 10 (Unimak Island portion), and 17.

Brant—A daily bag limit of 2 and a possession limit of 4.

Common snipe—A daily bag limit of 8.

Sandhill cranes—Bag and possession limits of 2 and 4, respectively, in the Southeast, Gulf Coast, Kodiak, and Aleutian Zones, and Unit 17 in the Northern Zone. In the remainder of the Northern Zone (outside Unit 17), bag and possession limits of 3 and 6, respectively.

Tundra Swans—Open seasons for tundra swans may be selected subject to the following conditions:

1. All seasons are by registration permit only.

2. All season framework dates are September 1–October 31.

3. In Game Management Unit (GMU) 17, no more than 200 permits may be issued during this operational season. No more than 3 tundra swans may be authorized per permit, with no more than 1 permit issued per hunter per season.

4. In Game Management Unit (GMU) 18, no more than 500 permits may be issued during the operational season. Up to 3 tundra swans may be authorized per permit. No more than 1 permit may be issued per hunter per season.

5. In GMU 22, no more than 300 permits may be issued during the operational season. Each permittee may be authorized to take up to 3 tundra swans per permit. No more than 1 permit may be issued per hunter per season.

6. In GMU 23, no more than 300 permits may be issued during the operational season. No more than 3 tundra swans may be authorized per permit, with no more than 1 permit issued per hunter per season.

Hawaii

Outside Dates: Between October 1 and January 31.

Hunting Seasons: Not more than 65 days (75 under the alternative) for mourning doves.





Sea Duck Information Series

Barrow's Goldeneye (*Bucephala islandica*)

French: Garrot d'Islande

Description

Barrow's goldeneyes are chunky mid-sized sea ducks with short necks, a relatively large rounded head, and a short gray-black bill. Males are markedly larger than females; males are about 48 cm (19 in) and females about 43 cm (17 in). Spring weights for males average 1278 g (2.8 lbs.) and 818 g (1.8 lbs.) for females.

Male Barrow's goldeneyes in breeding plumage have an iridescent purplish-black head with a crescent-shaped white patch between bill and eye, white sides, belly, and breast, and black back, wings and tail. They also sport a series of seven white chevrons along their sides. Females have a dark chocolate-brown head, slate-gray back, wings, and tail, and white flanks, belly and chest. Immatures and eclipse (molting) plumage males resemble females.

Both males and females have bright amber irises, hence "goldeneye". In flight, their wingbeat is rapid and they make a distinctive whistling sound – they are also called "whistlers". Both males and females have a white patch on their secondary (inner) wing feathers and a white bar above that on the inner upper wing that is more distinct on adult males than on females or immatures.

Barrow's goldeneyes can be most easily distinguished from common goldeneyes by the male's crescent-shaped white patch on its bill, the steeper angle between bill and forehead, and shape of head – Barrow's have steeper foreheads than common goldeneye, which have sloping foreheads more like canvasbacks.

Barrow's goldeneyes are named for John Barrow (1764-1848), a British arctic explorer.

Range

The breeding range of Barrow's goldeneyes is generally restricted to areas west of the Rocky Mountains from Montana to Alaska, and to a core breeding area in the east on the high plateau along the north shore of the St. Lawrence estuary and gulf. There is no evidence of exchange between the eastern and western populations.



Male Barrow's Goldeneye

The core of the western Barrow's breeding population is in interior areas of British Columbia. Their primary breeding range extends northward through southern Yukon into southcentral Alaska. Elsewhere within their western range, they are found locally or in lower densities.

Wintering areas in the west are coastal and extend from Kodiak archipelago, Alaska, south into Washington, with more localized occurrences south to San Francisco Bay and open waters of northwestern states. Most eastern Barrow's winter in the St. Lawrence estuary with smaller wintering populations along the Gaspé Peninsula, the Maritime provinces, and Maine.

Habitat and Habits

Barrow's goldeneyes breed primarily on alkaline to freshwater lakes and to a lesser extent on subalpine lakes, beaver ponds, and small sloughs in western mountain and intermountain areas. In Quebec, they prefer small fishless lakes that are found above 500 m (1600 ft) elevation.

Both males and females are territorial during the breeding season. Females nest in tree cavities, including abandoned pileated woodpecker nest cavities, or in artificial nest boxes. They usually

return to the same nest site in subsequent years. They lay a clutch of 6-12 eggs (average = 9), which they incubate for about 30 days.

The downy young are precocial and can dive immediately after they hatch for food, including insect larva and crustaceans. Mortality of young is high in the first couple weeks of life. Primary causes of death include adverse weather shortly after hatch and avian predators.

Male goldeneyes leave the female during nesting and fly to molting areas, often to more northern areas beyond their breeding range. Satellite telemetry has indicated that migration of males from breeding to molting areas is direct and swift, with some birds covering 1000 km (620 mi) in 2 days.

Known important male molting sites include Old Crow Flats in Yukon, a few lakes in northeast Alaska, and coastal areas of northern Quebec and Labrador. Aggregations of molting females have been observed in the breeding areas of central British Columbia.

Molting goldeneye are flightless for about 30 days while they grow new flight feathers. Males and females usually return to the same molting area in subsequent years.

Barrow's goldeneyes generally move south late in the fall season, remaining on inland areas, usually



Sea Duck Information Series

Common Goldeneye (*Bucephala clangula*)

French: *Garrot à oeil d'or*

Description

Common goldeneyes are chunky, medium sized sea ducks. Males are 45-50 cm (17 in.) long and weigh about 1000 g (2.2 lbs.) and females are 40-50 cm (15 in.) and 800 g (1.8 lbs.). Both sexes have a bright yellow iris, hence the name "goldeneye".

Males in breeding plumage (October to June) have an iridescent greenish-black head and a bright oval white patch behind the bill. Their white belly, breast, flanks, and neck contrasts greatly with the otherwise black feathering of their back and tail. It can be distinguished readily from Barrow's goldeneye by the oval patch behind bill versus the crescent shape of Barrow's. The bill is slightly longer and more wedge-shaped and the forehead rises more gradually than Barrow's.

Females have a chocolate-brown head, dark gray back and tail, and white belly, breast, and flanks. Their bill is black and tipped with yellow. Female common goldeneyes are difficult to tell apart from Barrow's females. Immature males are difficult to distinguish from females.

In flight, the inner wings of both males and females have a white patch that contrasts with the black outer wing feathers. Their wingbeat is rapid and wings make a distinctive whistling sound, thus they are also called "whistlers". Other than the whistling of their wings, common goldeneyes are usually silent.

Range

Common goldeneyes breed in forested regions of Canada and Alaska, and northern parts of the lower U.S. (northern New England, Great Lake states, and Montana). They winter throughout North America as far north as water remains ice-free, with highest densities in coastal bays from New England to Chesapeake Bay and from southeast Alaska to British Columbia. They are also common in the St. Lawrence estuary, Great Lakes, Mississippi River during winter.



Photo: Tim Bowman

Common Goldeneye pair

Habitat and Habits

Common goldeneyes are often the last waterfowl to move south in the fall and one of the first species to migrate north in spring, arriving as soon as the first open water is available. They arrive on breeding grounds in April and May, depending on latitude. Males and females are paired when they arrive. It is not known if the pair reunites in successive years. Females do not breed until their second year; in British Columbia the average age at first breeding was 3 years. They usually return to the same nest site year after year.

Common goldeneyes nest in tree cavities and are found in forested areas where large dead and dying trees provide suitable nesting sites. They will also readily nest in artificial nest boxes. Nest sites are typically in wetlands or waterways bordered by trees large enough to have nest cavities. Goldeneyes prefer lakes that are fish-free, which ensures less competition for their aquatic invertebrate prey.

Females lay one egg every other day until 8-10 eggs are laid. They then begin incubation, which lasts about 30 days. Ducklings can swim and feed immediately after hatching. Females with broods are territorial and do not tolerate other waterfowl

nearby. The female often abandons the brood before they can fly at about 60 days.

Mortality of ducklings is highest during the first two weeks of life; causes of death include adverse weather, and predation by mammals (mink, weasel) and pike.

Common goldeneye commonly lay their eggs in the nests of other common goldeneye as well as other cavity-nesting ducks. They are territorial during the breeding season and males defend breeding territories using a threat display and by chasing intruders both above and below the surface of the water.

Males leave the females 1-2 weeks after incubation begins and make a molt migration. Both males and females undergo a complete wing molt that renders them flightless for 3-4 weeks. Molting areas that have been identified are in the Great Lakes region and interior lakes of Canada, as well as the area around James and Hudson Bays. Others surely exist but have not been well documented.

Their diet during the breeding season is mostly aquatic insects and during the winter their diet is more diverse, including fish, crustaceans (shrimp, amphipods), and mollusks (clams and mussels). Both adults and young feed by diving, whereby

RC64

5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. By Anchorage Fish and Game Advisory Committee.

Comments:
No comment.

*Ahtan Tene Bene
Part II*

**Proposal 106:
5 AAC 84.270. Furbearer trapping. By Anchorage Fish and Game Advisory Committee.**

Comments:
We oppose Proposal 106 to trap black bears in all of Region IV Units. If Region IV did not include Unit 13, and only included remote areas, it would fine to trap black bears. It is an unsafe practice to trap black bears near the communities in Unit 13.

**Proposal 107:
5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. By Aaron Bloomquist.**

Comments:
We are neutral on Proposal 107 to change and clarify Region IV guided black bear baiting requirements.

**Proposal 108:
5 AAC 85.015. Hunting seasons and bag limits for black bear. By Anchorage Fish and Game Advisory Committee.**

Comments:
We are neutral on Proposal 108 to establish a regional bag limit for black bears in Region IV.

**Proposal 109:
5 AAC 92.015. Brown bear tag fee exemptions. By National Park Conservation Association.**

Comments:
We oppose Proposal 109 to “removing the brown bear tag fee revocation in Unit 11, and Unit 13”. The population of the Mentasta Caribou Herd is decimated, which is probably due to predators such as brown bears or wolves. Re-instating the brown bear tag fee will hinder the public from hunting brown bears in Unit 11 and Unit 13. The moose population in Unit 13 is healthy and we would like to see it kept like that.

**Proposal 110:
5 AAC 92. 015. Brown bear tag fee exemptions. By Alaska Department of Fish and Game.**

Comments:



We support Proposal 110 to “reauthorize the brown bear tag fees for Region IV”. More hunters will be encouraged to take more brown bears in Unit 11 and Unit 13 and keep the brown bear population from increasing and preying upon caribou and moose calves.

Proposal 111:

5 AAC 85.060. Hunting seasons and bag limits for fur animals. By Kenai Peninsula Trappers Association.

Comments:

We support Proposal 111 to change the bag limits for all of Region IV units to “no limit”. Coyotes in Unit 11 and Unit 13 are not a conservation concern.

Proposal 112:

5 AAC 85.060. Hunting seasons and bag limits for fur animals. By Anchorage fish and Game Advisory Committee.

Comments:

We oppose Proposal 112 to change the coyote hunting season for Unit 11 and Unit 13 to a “no season limit”. Hunting coyote throughout the whole year is not good nor is the fur of the animal after the month of March.

Proposal 113:

5 AAC 85.060. Hunting season and bag limits for fur animals. By Jon Freeman.

Comments:

See comments under Proposal 111.

Proposal 115:

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. By Anchorage Fish and Game Advisory Committee.

Comments:

We support Proposal 115 to change the Dall sheep hunts for all of Region IV to exclude taking Ewe and “full curl ram only”. A Full curl ram hunt only will dis-allow hunters from taking immature Dall sheep.

Proposal 116:

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. By Loren Karro.

Comments:

See comments under Proposal 115.

Proposal 117:

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. By Aaroon Bloomquist.

Comments:



We oppose Proposal 117 to introduce an archery registration hunt for sheep in all of Region IV.

Proposal 118:

5 AAC 85.040. Hunting seasons and bag limits for goat. By Dan Montgomery.

Comments:

We are neutral on Proposal 118 on guided hunts for goats in Unit 13D.

Proposal 122:

5 AAC 92.052 Discretionary permit hunt conditions and procedures. By the Board of Game.

Comments:

While review of discretionary hunt conditions and procedures may be necessary, there are some permit conditions which are important and should be retained such as the 5 AAC 92.052(22) that allows permits to be transferred within the second degree of kinship in GMU 13. Any revision of this regulation should include the impact such revision may have on the Tier I community hunts the Board has authorized for moose and caribou in GMU 13 and the Tier I household hunt the Board has authorized for caribou in GMU 13 (as well as any second Tier I moose hunt the Board may adopt for GMU 13).

Southcentral and Central/Southwest Regions

Proposal 192:

5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. By Richard Luzitano.

Comments:

We oppose Proposal 152 to “restrict trapping near trails and roads in all of Region II and Region IV units. It is the parent’s and owner’s responsibility to take care of their children and dogs, so they won’t be caught in traps. More restrictions on trapping areas will discourage trapping in these two regions.

Proposal 194:

5 AAC 85.065. Hunting seasons and bag limits for small game. By Nancy Hillstrand.

Comments:

We are neutral on Proposal 194 because it is not clear in the proposal what the separate waterfowl regulation would be for the commercialized guided bird hunters and sport hunters in all of Region II and Region IV.

Proposal 195:

5 AAC 92.220(a)(4). Salvage of game meat, furs and hides. By Vince Holton.

Comments:



We are neutral on Proposal 195 to change the Region II and Region IV salvage requirements for black bear as follows:

January 1-June 30 the hunter must salvage the hide, skull and edible meat (as defined as by 5 AAC 92.990) and that June 30-December 31 the hunter must salvage the skull, and must salvage either the meat, or the hide (or both if chosen). Except in sub/units where the biological necessity to monitor black bear populations and harvest through the sealing of hide and skulls as determined by the department.

Proposal 196:

5 AAC 92.165. Sealing of bear skins and skulls. By Vince Holton.

Comments:

We support Proposal 196 to “eliminate black bear sealing requirements where harvest tickets or registration permits are required and provide necessary harvest data”.

Proposal 197:

5 AAC 92.044 Permit for hunting black bear with the use of bait or scent lures. By Joel Doner.

Comments:

We are neutral on Proposal 197 “allow same day airborne hunting of black bear at bait station in Region II and Region IV”.

Proposal 198:

5 AAC 85.060. Hunting seasons and bag limits for fur animals and 84.270. Furbearer trapping. By Stephen Darilek.

Comments:

See comments under Proposal 111.

Proposal 199:

5 AAC 92.220 Salvage of game meat, furs, and hides; and 92.003. Hunter education and orientation requirements. By Nancy Hillstrand.

Comments:

We oppose Proposal 199 to “have hunter education include meat processing care information, hunts delayed if temperature is 70° in the field, cooler temperatures will change timing of hunts, and requirement to rent satellite phones in the field”. We support the concept for those hunters who are not true subsistence hunters. Most of the Ahtna people would not be able to afford satellite phones in the field.

Proposal 200:

5 AAC 92.085. Unlawful methods of taking big game; exceptions. By Brian Peterson.

Comments:

No comment. See comments under Proposal 201.

Proposal 201:

5 AAC 92.085. Unlawful methods of taking big game; exceptions. By Brian Peterson.

Comments:

We support Proposal 201 to make it “unlawful to harvest any big game species spotted, located, seen while being transported until 3 p.m. the following day game was located, spotted, or seen while being transported”. It is an unfair advantage to allow same day airborne hunters to harvest wild game after being transported on the same day. This is not a true hunting experience of pursuing and harvesting wild game.

Interior Region

Proposal 202:

5 AAC 92.015. Brown bear tag fee exemptions. By Alaska Department of Fish and Game.

Comments:

We support Proposal 202 to “reauthorize the grizzly bear tag fee exemption in Unit 12 and Unit 20A. This will encourage more hunters to harvest brown bears in these two units. Brown bear population is not a conservation concern.

Proposal 203

5 AAC 85.045(a)(17) and (18). Hunting seasons and bag limits for moose. By Alaska Department of Fish and Game.

Comments:

We oppose Proposal 203 because it encourages land trespass on Ahtna, Inc. lands. We oppose Nonresident hunting season, muzzleloader rifle hunts, and registration hunts only in subunit Unit 20A. There are too many hunters hunting and trespassing on former Cantwell Village lands.

Statewide

Proposal 214:

5 AAC 92.012. Licenses and tags.; and 92.990. Definitions. By Brad Dennison and amended by the Board of Game.

Comments:

We oppose Proposal 214 to “allow second degree-kindred relatives taking nonresidents on certain big game hunts”. We oppose nonresident hunts for big game animals, especially, for caribou and moose. Hunting should only be allowed for Alaskan residents.

Proposal 215:

5 AAC 92.050. Required permit hunting conditions and procedures. By Board of Game.

Comments:

We are neutral on Proposal 215 to “re-adopt regulations establishing a bonus point system for some drawing hunts”.

Proposal 216:

5 AAC 92.230. Feeding of game. By Alaska Wildlife Troopers.



Comments:

We support Proposal 216 “ to prohibit feeding of Dall sheep”, since it is not listed in the regulations. Photographers and other people who feed Dall sheep near the bird point on the Seward Highway, so that they can watch Dall sheep or to photograph them will cause potential vehicular accidents.

Proposal 217:

5 AAC 92.010(c). Harvests tickets and reports. By Alaska Wildlife Troopers.

Comments:

We support Proposal 218 to “make it unlawful for persons to falsify information on harvest records”. Accurate records for the department are needed keep track of wild game populations, harvest of wild game, and hunt areas.

Proposal 218:

5 AAC 92.140(a). Unlawful possession or transportation of game. By Alaska Wildlife Troopers.

Comments:

We support Proposal 218 to allow Alaska Wildlife Troopers to “seize animals that are killed by people trespassing on private land; seizing animals that are killed by people who are intoxicated or other criminal misconduct involving weapons”. Trespassing on Ahtna Inc. lands increases during the hunting season and caribou and moose are harvested corporate private lands. Seizing wild animals, such as moose and caribou taken on private lands should be enforced as well as trespassing on private lands.

Proposal 219:

5 AAC 92.171. Sealing of Dall sheep horns. By Alaska Wildlife Troopers.

Comments:

We support Proposal 219 to “prohibit the alteration of Dall sheep horns before sealing”. This will prevent illegal take of immature rams.

Proposal 220:

5 AAC 92.XXX. By Alaska Wildlife Troopers.

Comments:

We support Proposal 220 to “allow Alaska Wildlife Troopers to inspect taxidermy businesses”. Alaska Wildlife Troopers should be able to inspect taxidermy businesses whenever needed, provided that it is within the confines of laws that are already allowed by the Board of Fish.

Proposal 221:

5 AAC 92.080. Unlawful methods of taking game; exceptions: By Department of Fish and Game.

Comments:

We support Proposal 221 to “prohibit the use of Taser-type devices without permits”. No one should use taser-type devices on wild game, even with a permit. These devices will cause harm to wild game.

Proposal 222:

5 AAC 92.011. Taking of game by proxy. By The Board of Game.

Comments:

We are neutral on Proposal 222 to review antler destruction by Proxy on behalf of a beneficiary.

Proposal 223:

5 AAC 92.252. Discretionary permit hunt conditions and procedures. By The Board of Game.

Comments:

We oppose Proposal 223 to “review the discretionary authority requiring the nullification of trophy value of animals taken under a subsistence permit”.

Proposal 231:

5 AAC 85.045(11). Hunting seasons and bag limits for moose. By Alaska Department of Fish and Game

Comments:

We oppose Proposal 231 for a Unit 13A Antlerless Moose hunt. We believe it will be better for the growth and conservation of the moose population in GMU 13 A if there is not an antlerless moose hunt.

Proposal 232:

5 AAC 92.540(H)(ii). Controlled Use Areas. By Fairbanks Advisory Committee.

Comments:

We oppose Proposal 232 to allow motorized vehicles restricted from August 1 through September 30. We would like to keep the year around restriction. Lifting motorized vehicle use in the Yanert Controlled Use Area will cause erosion to the soil, impact the resources, make additional trails and encourage trespass on Ahtna, Inc. lands. Additionally, we are opposed to the Unit 20A Antlerless Moose hunts for similar reasons as mentioned.

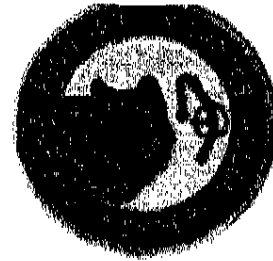
Alaska Board of Game Comments**1/28/2011****re: proposal 193 and 194****from: Warren Brown****Board Members,****I am against prop 193 for these reasons:**

- 1) there is no biological justification to support this proposal, just ask the waterfowl division. The sources for the info in the proposal are not specified and are misleading.**
- 2) Alaska waterfowl hunters do not put a dent in the goldeneye or any other duck species overall populations**
- 3) Alaska waterfowl biologists don't agree with the assertions**
- 4) do not lump goldeneyes in the sea duck category as they are a diving duck and are not in the sea duck bag limit anywhere else**
- 5) waterfowl hunters are so few in Alaska and so few goldeneyes are taken that this reduction would have no effect on that population**
- 6) this will hurt the native and non native Alaskans ability to feed their families. Contrary to speculation, goldeneyes are edible and a big part of some hunters diet.**

I am against proposal 194 for these reasons:

- 1) there will never be an end to putting in proposals of this nature no matter what changes are made. Reductions have happened twice over the last few years because of these proposals and that hasn't stopped the proposal writer.**
- 2) If you take away the waterfowl guide, it creates a loss of hunting opportunity for local hunters who cannot afford all the boats and gear it takes to be successful. This is November/December hunting when most people have put their boats away for the winter,, and they know its safer to hunt with a guide**
- 3) how can you differentiate between a sport hunter and a hunter only out for food?**
- 4) I am a waterfowl guide and would be hurt by any change in the regulations**





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

From: Alaska Frontier Trappers Association
P.O. Box 3208
Palmer, AK 99645

Subject: Additional Comments on BOG proposals for March 4-10 meeting

Proposal 128: **Opposed**. There is no biological reason to close the remainder of 14C or Unit 6 to wolverine trapping. Populations in these units are sustainable to support trapping of wolverine and should be managed as such.

Proposal 129: **Support**. We support management of game populations on military land (JBER) as a sustainable resource, thereby allowing Alaskan trappers harvest opportunities for this valuable resource.

Submitted by: Rick C. Ellis
on behalf of the Alaska Frontier Trappers Association





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

From: Alaska Frontier Trappers Association
P.O. Box 3208
Palmer, AK 99645

Subject: Comments on BOG proposals for March 4-10 meeting

Proposal #1 - Support, if the ADF&G area biologist sees the need for the change and sees no down side (example: negative impact on breeding population) to enacting the proposal. If approved, would allow for additional trapping opportunity and potential harvest of a valuable fur resource.

Proposal #2 - Support, if the ADF&G area biologist sees the need for the change and sees no down side (example: negative impact on breeding population) to enacting the proposal. If approved, would allow for additional trapping opportunity and potential harvest of valuable fur resource. Additionally, this would align the lynx (if Proposal #1 is approved) and wolverine trapping seasons for the area, simplifying enforcement for the troopers.

Proposal #3 - Support, if the ADF&G area biologist supports the measure and sees no negative impact to the breeding population. If approved, this proposal would allow for additional trapping opportunity and potential harvest of a valuable fur resource. Additionally, this would allow for retention of non-targeted wolverine by wolf trappers and eliminate the need for potentially dangerous "releases" of trapped wolverine.

Proposal #71 - Support, if amended to include Units 14A and 14B . If approved, the amended proposal would standardize the sealing requirements for the South Central units in Region IV. If the data gathered from sealing of furs is actually needed and used by ADF&G, then this proposal would provide a more cost effective means of obtaining the information required. Make the fur harvest reports for beaver and marten in these units required the same way harvest reports are required after successful hunts.

Proposal #72 - Opposition. This proposal would remove one of the major tools available to the ADF&G to manage the beaver population at Reflections Lake.

Historically, the department has called upon members of the Alaska Frontier Trappers Association (AFTA) to remove beavers from the lake in an effort to control habitat destruction. The AFTA uses the trapping available at Reflections Lake as a teaching



opportunity for youngsters due to the easy access involved. Beavers are typically removed by licensed trappers in the fall or early winter, only to be replaced the following Spring by juvenile beavers dispersing as two year olds down the Knik river drainage. This pattern has been repeated annually for as long as anyone can remember and shows no sign of changing.

Efforts to control habitat destruction by the beavers is a double-edged sword. While attempts to protect trees from cutting by the beavers may have some limited success, depriving the beavers of their food source would ultimately lead to their demise (through starvation) or their relocating to other areas where food is available. Without the use of annual trapping at Reflections Lake, a balance between habitat and a sustainable beaver population is not possible.

Given that beaver trapping at the lake typically occurs in late fall and early winter, the public would still be able to enjoy the sight of beavers in the lake during the Spring and Summer months. Additionally (and contrary to the statement in the proposal), the methods normally used (drowning sets and submerged body-grip traps) to trap beavers minimize the risk of human and pet injuries and lend themselves to there being plenty of safe areas to place traps around the lake.

Proposal #103 - Support. The Intensive Management Plan for Unit 16 appears to be working and the Department should be allowed to build on this success. Please reauthorize the plan.

Proposal #104 - Support. Brings the beaver season in these Units in alignment with the other Units in Central and Southwest, while also providing additional economic benefit to trappers through increased harvest opportunities.

Proposal #111 - Support. Brings consistency to the hunting bag limits for coyotes in Regions II, III and IV.

Proposal #112 - Opposed. Coyotes are a valuable fur bearer and as such, the AFTA would like to see them taken only when their fur is prime. We (AFTA) can support no bag limit and/or possession season limit on coyotes, but remain opposed to the idea of no closed season on a valuable furbearer.

Proposal #113 - Opposed. Same argument as for Proposal #112. If the Department determines there is excessive depredation in a particular area of alpine sheep habitat, then we would support selective control measures for those affected areas.

Proposal #187 - Support with amendment. Amend the proposal to read "...with traditional methods of trapping being limited to bucket snares." and change "snares to be checked..." to read "bear bucket-snares to be checked...".

Proposal #188 - Support. Removes inconsistencies in bag limits for coyotes in Regions II, III and IV.

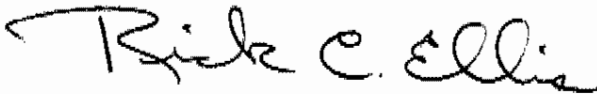
Proposal #189 - Opposed. Same argument as made in opposition of Proposal #112.

Proposal #192 - Opposed. Proposal is too vague in it's use of the term "trail". If approved, it could lead to the application of this proposal to existing trapper's trails, etc. Additionally, we take exception to the use, once again, of the "threat to children" position when proposals seek to limit legal trapping activities. There has never been a documented case of injury to a child from legally set traps and to imply that trapping poses such a risk is ludicrous.

As for the request of the submitter of this proposal to "make it illegal for dogs being walked or run on state roads and trails on a rope to be trapped", we submit and point out that targeting domestic animals for trapping is already illegal and that no such trapping on the roads occurs. Adding a 50 foot "safety corridor" along state roads and trails would only be the beginning, much like the late "Buffer Zone" around Denali National Park. While the AFTA regrets the loss of anyone's pet to a trap, we maintain that dogs remaining on the roads remain safe and we still concur with the Matanuska-Susitna Borough that maintaining positive control of a pet is the owner's responsibility.

Proposal #198 - Support, if the ADF&G area biologist supports the measure. If approved, this proposal would allow for potential additional harvest of a valuable fur resource.

Proposal #215 - Support, with amendment to include the bonus point system with all permit drawings.



Submitted by: Rick C. Ellis
on behalf of the Alaska Frontier Trappers Association



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February 15, 2011

To: Board of Game Comments
Alaska Department of Fish & Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526
(907) 465-6094

From: Lee S. Peterson
4867 East Alder Drive
Wasilla, AK 99654

Subj: Comments of BOG proposals for hearing March 4-10, 2011

I would like to express my opposition to two proposals to be considered and my reasons behind my opposition. Specifically proposals number 72 – 5 AAC 92.550 (Areas closed to trapping) and 192 – 5 AAC 92.095 (Unlawful methods of taking furbearers: exceptions).

Proposal Number 72; I oppose adoption of this proposal on several grounds;

- (1) The Palmer Hay Flats State Game Refuge Management Plan has a clearly stated goal (Goal 2) to “maintain opportunities to hunt, fish, and trap”. In short, the Hay Flats are for all users.
- (2) I see no impact on the proposers intended usage. Trapping is typically done during late fall and winter when pelts are at their prime and thus their peak economic value. I know of no beaver “set” that is above water during winters.
- (3) The statement “traps and the high usage of this area is a disaster waiting to happen” is simply not true as beaver traps are usually of the “droning set” or “submerged sets” using body gripping traps.
- (4) The statement “Due to the geographical set up of the area, there is no safe area to place traps that would not endanger children and pets.” is an irresponsible and emotional statement. Trapping has ceased by the time ice is out of Reflections Lake so the risk to children is nil. I would like to see statistics concerning numbers of incidental catch of children in animal traps. As to pets being caught I invite you and the submitter to read Mat-Su Borough Code, Title 24. This code is perhaps more commonly known as a “leash law” and is very specific in regards to pets and the owners’ responsibility to control them. It is written so that the average person will have no doubt that



any domestic animal is required to be under positive control at all times as opposed to free running. This same code re-enforces state law concerning the illegality of setting of traps with the intent of catching domestic animals.

Proposal Number 189; I oppose adoption of this proposal also because;

- (1) The vagueness of the word "trail". It does not differentiate between a trail established by a governmental agency and identified as such, a trappers trap line trail, an impromptu or personally established hiking trail, or a game trail. Those trappers I personally know do **NOT** "set" close to trails because theft of caught animals is very real and happens repeatedly. There is the additional danger of traps being intentionally destroyed, or stolen, by those who may disagree with the practice of trapping wild animals. I have had both happen to me and my small trap line.
- (2) Again I would ask if there is a documented case of a child getting caught in a legally set animal trap other than accidentally "triggering" his/her own set prematurely. This statement is made to appeal to emotions and unfounded in, or substantiated by, any factual data.
- (3) Mat-Su Borough Code, Title 24 as well as State of Alaska Statutes specifically address the illegality of setting traps, snares, deadfalls or other methods of "take" for domestic animals. This same code is also specific in control of domestic animals when outside of the owners' yard, kennel, etc. It is regrettable that the submitter of this proposal lost a dog. I would suggest that personal education on how traps work and how to release the jaws of "Conibear" style traps with a simple piece of rope and a stick could be key in the prevention of another dog death such as this.

Submitted by:  Lee S. Peterson



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RE 29

FEBRUARY 5, 2011

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

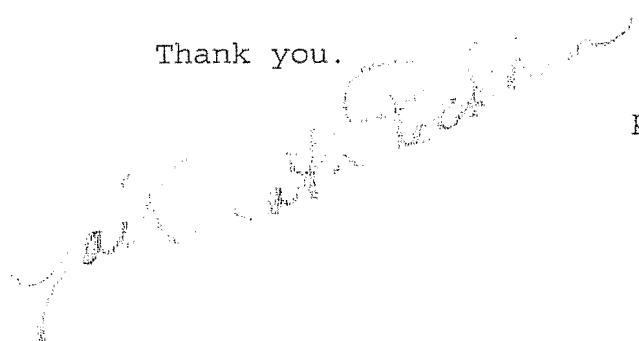
To Whom It May Concern:

This is Gail Ruth Peckham speaking. I am a 55-year-old resident of Anchorage, Alaska, having moved here in 1998.

I wish to join, as in agreement, with the written comments submitted to the Alaska Department of Fish and Game on February 18, 2011, by the Defenders of Wildlife, the Alaska Center for the Environment and the Alaska Wildlife Alliance.

In addition, I would ask that the Alaska Department of Fish and Game better outline their amendment to Proposal 103 to facilitate an opportunity for a further evaluation of their plans.

Thank you.


peckham803@aol.com



February 16, 2011

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

Re: Spring 2011 BOG Meeting, Southcentral Alaska

Board Members:

Please find below my comments on proposals. I have limited the detail of my comments but wish to state overall that the Board of Game needs to begin representing all Alaskans by making decisions that reflect the needs and values of nonconsumptive users. I support those proposals that take into full consideration nonconsumptive uses; I oppose those that do not.

My comments:

Proposal 72. Support. A portion of Palmer Hay Flats should be closed to allow for nonconsumptive recreation.

Proposal 77. Oppose. Snaring is unethical and cruel and most Alaskans don't support it.

Proposal 78. Support. Bears should be removed from IM.

Proposal 101. Support. Season and bag limits of wolves should be reduced in 16A.

Proposal 103. Oppose. Unit 16 doesn't need more predator control.

Proposal 106. Oppose.

Proposals 111-113 & 189. Oppose. A year round hunting season with no bag limit for coyotes throughout GMU 14, including Chugach State Park, would conflict with the major use of that park which is wildlife viewing of naturally occurring wildlife populations. Most residents of Anchorage and nearby communities support. There is noscientific rationale for eradicating coyotes in Chugach State Park. What's more, a twelve month open hunting season would pose a danger to the thousands of people who spend time in this state park.

Proposal 115 and 116. Oppose.

Proposal 128. Support. Wolverine trapping should never have been allowed and should now be closed.

Proposal 130-132. Oppose. Bag limits of bears should not be increased; they should be decreased.

Proposal 135, 1336. Oppose. Goat hunting should not be changed.



Proposal 137. Oppose. Anchorage residents value their moose for more than meat, and removing more would go against any fair value of wildlife by the majority of users.

Proposal 140. Oppose. We don't need more wolf hunting in 14C.

Proposal 177. Support. Portage Creek Valley should never have been opened to trapping, and should now be closed.

Proposal 187. Oppose. I am very opposed to trapping of bears in Chugach State Park by establishing a bag limit. This is an extremely unethical and dangerous method. Bucket snare trapping poses a threat to the Park's many visitors because of habituation associated with the use of bait at bucket snaring sites.

Proposal 188. Oppose. Coyote are not vermin to be trapped out.

Proposal 190. Oppose. Sheep hunting in the Park should be managed carefully, and with policies aimed specifically at the special circumstances in the Park.

Proposal 191. Oppose. The Department needs broad discretion and authority in regard to permits issued for the Park because of the high use of the Park by hunters and non consumptive users, and its proximity to Anchorage, Girdwood and Eagle River/Chugiak.

Proposal 192. Support. I strongly support this proposal to restrict trapping near trails and roads throughout Region III. It's way overdue, as people and dogs have been at risk every year, dogs have been killed and the majority of users have been put at risk for a few trappers.

Proposals 216-220. Support. I support the Alaska Wildlife Troopers in increasing the effectiveness of their enforcement. This is an extremely important issue, especially in Southcentral Alaska.

Proposal 232. Oppose. Opening the Yanert Valley area to motorized hunting is unnecessary and dangerous. It makes an unnecessary fundamental change in a long-standing use area. Furthermore, such a significant proposal should not be considered out of cycle.

Sincerely,



Marybeth Holleman
9138 Arlon Street, Suite A, Box 666
Anchorage, AK 99507





United States Department of the Interior
NATIONAL PARK SERVICE

Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:
L30(AKRO-SUBS)

FEB 18 2011

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

Dear Chairman Judkins:

The National Park Service (NPS) appreciates the opportunity to comment on the Central/Southwest Region (Region IV) proposals being considered by the Alaska Board of Game (BOG) at the Spring 2011 meeting. We have reviewed 223 proposals scheduled for consideration by the BOG at the meeting on March 4 - 10, 2011. There are a number of proposals before the BOG that affect or have the potential to affect NPS areas in the state. We are providing you with comments on 31 proposals. 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 of 1916 and the Alaska National Interest Lands Conservation Act (ANILCA). We recognize and support the State's fundamental role in wildlife management while at the same time we must assure that the laws, regulations, and policies of the National Park Service are upheld.

Our specific comments on proposals follow:

Proposals #4, 5, 6, 7, 28 & 76 Oppose (Affecting Game Managements Units (GMUs) 9, 16 & 17B)

These proposals are directed at reducing Brown Bear populations in an attempt to reduce bear predation and increase moose and caribou populations. As we have expressed to the Board on prior occasions, manipulating the population of our species for the benefit or detriment of another species is contrary to NPS policies. Should the Board adopt these proposals, we recommend that you add language that will exclude NPS lands. The proposed changes potentially affect NPS lands in Alagnak Wild River, Aniakchak National Preserve, Katmai National Preserve and Lake Clark National Preserve.



Proposal #14 Support (Affects GMU UNIT 9)

The proposal establishes a registration moose hunt in Unit 9. A registration permit system allows the Department to collect more reliable harvest data. State and Federal wildlife managers need harvest information to support management decisions affecting moose populations in Unit 9. As a member of the Unit 9 Moose Working Group, the NPS supports the proposal. The proposed changes potentially affect NPS lands in Alagnak Wild River, Aniakchak National Preserve, Katmai National Preserve, and Lake Clark National Preserve.

Proposals #21, 22, 27 & 77 Oppose (Affects GMUs 9B, 9E, 16 & 17B)

These proposals call for the implementation of predator control plans for wolves and brown bears. Such management is not allowed on NPS managed lands. The proposed changes potentially affect NPS lands in Aniakchak National Preserve and Lake Clark National Preserve.

Proposal #38 Oppose (Affects GMU 17)

The proposal would allow use of radio communication for taking wolves in Unit 17. The proposed regulatory change is inconsistent with Federal regulations. Should the Board adopt the proposal, we ask that NPS lands be specifically excluded. The proposed changes potentially affect NPS lands in Lake Clark National Preserve.

Proposal #40 Support on NPS lands (Affects GMU 13)

This proposal would return seasons and bag limits to levels similar to 1995 prior to the establishment of intensive management efforts in Unit 13. It would also provide seasons similar to Denali State Park that is adjacent to Denali National Park lands in Unit 13. An associated proposal #109 would also return the requirement for a brown bear tag as is required on State Park lands in the area. The National Park Service supports the intent of this proposal to minimize the effects of longer seasons and higher bag limits for brown bear populations that use National Park Service managed lands, similar to considerations that have been given to State Park lands. The proposed changes potentially affect NPS lands in Wrangell-St. Elias National Preserve and wildlife populations in Denali National Park.

Proposal #71 Oppose (Affects GMU 16)

The proposal would eliminate the sealing requirement for beaver and marten in Unit 16. Sealing requirements provide State and Federal wildlife managers with a method to measure and record biological data on specific species and populations. In addition, sealing data allow State and Federal wildlife managers to track the age and condition of harvested animals. The proposed changes potentially affect NPS lands in Denali National Preserve and Lake Clark National Preserve.

Proposal #74 Oppose (Affects GMU 16)

The proposal would allow guide-outfitters to have up to ten bait stations in Unit 16. The NPS is particularly concerned about the 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. Should the Board adopt this proposal, we ask that NPS lands be specifically excluded. The proposed changes potentially affect NPS lands in Denali National Preserve and Lake Clark National Preserve.



Proposal #78 Support (Affects GMU 16)

The proposal would remove black and brown bears from the intensive management plan for Unit 16. NPS policy does not allow management practices intended to produce high population levels of moose or caribou for harvest. The proposed changes potentially affect NPS lands in Denali National Preserve.

Proposal # 105 Oppose (Affects Region IV)

This proposal is in conflict with NPS regulation which prohibits same-day airborne takings on NPS managed lands. Should the Board adopt this regulation, NPS lands should be specifically excluded. Hunters could be misled by State regulations that do not clearly make a distinction and face the prospect of receiving federal citations for violating NPS regulations on NPS lands. By providing clarification in State regulations such unnecessary situations can be avoided. The proposed changes potentially affect NPS lands in Alagnak Wild River, Aniakchak National Preserve, Denali National Preserve, Katmai National Preserve, Lake Clark National Preserve and Wrangell-St. Elias National Preserve.

Proposal #106 Oppose (Affects Region IV)

This proposal establishes a trapping limit of 10 for black bears. The NPS does not support the trapping of black bears in NPS areas. The proposed limit of 10 annually is more than three times the existing hunting limit of three black bears annually. Should the Board move forward with setting black bear trapping limits, we request that NPS lands be excluded. Bear trapping in some areas, like national park units, may lead to user conflicts where there is the potential for high use from non-hunters. We remain concerned about public safety issues resulting from this activity. The proposed changes potentially affect NPS lands in Alagnak Wild River, Aniakchak National Preserve, Denali National Preserve, Katmai National Preserve, Lake Clark National Preserve and Wrangell-St. Elias National Preserve.

Proposals #107 Oppose (Affects Region IV)

The proposal would modify guided black bear baiting requirements in Region IV by allowing registered guides to maintain up to 10 bait stations. The NPS is particularly concerned about the introduction and immediate 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. Should the Board adopt the proposal, we ask that NPS lands be specifically excluded. The proposed changes potentially affect NPS lands in Alagnak Wild River, Aniakchak National Preserve, Denali National Preserve, Katmai National Preserve, Lake Clark National Preserve and Wrangell-St. Elias National Preserve.

Proposal #108 Oppose (Affects Region IV)

This proposal would establish a hunting limit, within Region IV, of five black bears annually per hunter. The individual GMU hunting limits for black bear would remain unchanged; however, we are concerned that a cumulative effect of harvest within a region is not well understood and could have unknown affects. The proposed changes potentially affect NPS lands in Alagnak Wild River, Aniakchak National Preserve, Denali National Preserve, Katmai National Preserve, Lake Clark National Preserve and Wrangell-St. Elias National Preserve.



Proposal #109 Support (Affects GMUs 11, 13 & 16B)

This proposal would remove the tag fee revocation for all lands in Unit 13 and NPS managed lands in Units 11 and 16B. Consistent with the narrative in the proposal and based on several comments from past years, the NPS supports this proposal as it relates to all NPS lands. The proposed changes potentially affect NPS lands in Denali National Preserve and Wrangell-St. Elias National Preserve.

Proposal #110 Oppose (Affects Region IV)

This proposal would reauthorize the brown bear tag fees. However, a number of areas, including various NPS lands, are excluded, and tag fees are not required. The NPS does not support these exclusions. The proposed changes potentially affect NPS lands in Alagnak Wild River, Aniakchak National Preserve, Denali National Preserve, Katmai National Preserve, Lake Clark National Preserve, and Wrangell-St. Elias National Preserve.

Proposals #111, 112 & 113 Oppose (Affects Region IV)

These proposals would increase the coyote hunting limit in Region IV units from 10 coyotes per day to an unlimited number annually, have no closed season and reduce salvage requirements to the skull only. Raising the limit to no limit could have unforeseen environmental consequences that need not be encountered. Proposal #113 states that this will be done for predator control reasons, an activity not allowed on NPS lands. The proposed changes potentially affect NPS lands in Alagnak Wild River, Aniakchak National Preserve, Denali National Preserve, Katmai National Preserve, Lake Clark National Preserve, and Wrangell-St. Elias National Preserve.

Proposal #119 Oppose (Affects GMUs 9, 17, 18, 19)

This proposal calls for the implementation of a predator control plan for the range of the Mulchatna Caribou Herd which includes some NPS managed lands. Predator control is not allowed on NPS managed lands. The proposed changes potentially affect NPS lands in Denali National Preserve and Lake Clark National Preserve.

Proposal #120 Oppose (Affects Regions III & IV)

This proposal calls for modification of the harvest objectives established in regulation for the Mulchatna Caribou Herd. We support the Department's comments as stated in their Preliminary Recommendations to the Board of Game on page 47-48 where it is recommended to not adopt the proposal. The proposed changes potentially affect NPS lands in Lake Clark National Preserve.

Proposals #121, 197 Oppose (Affects Region IV)

These proposals would allow same-day-airborne hunting of wolves and black bear. The proposed changes are in conflict with NPS regulations which prohibit same-day airborne takings in NPS areas. Should the Board adopt these regulations, NPS lands should be specifically excluded. Hunters are likely to be misled by State regulations that do not clearly make this distinction and face the prospect of receiving federal citations for violating NPS regulations on NPS lands. By providing clarification in State regulations, such unnecessary situations can be avoided. The proposed changes potentially affect NPS lands in Alagnak Wild River, Aniakchak National Preserve, Denali National Preserve, Katmai National Preserve, Lake Clark National Preserve, and Wrangell-St. Elias National Preserve.



Proposal #202 Oppose (Affects Interior Region Units)

This proposal would reauthorize the grizzly bear tag fees. However, a number of areas, including various NPS lands, are excluded, and tag fees are not required. The NPS does not support these exclusions. The proposed changes potentially affect NPS lands in Denali National Preserve, Gates of the Arctic National Preserve, Lake Clark National Preserve, Wrangell-St. Elias National Preserve and Yukon-Charley Rivers National Preserve.

Proposal #223 Take No Action (Affects GMUs 22 & 23)

The Board of Game has asked the Department of Fish and Game to review the discretionary authority requiring the nullification of trophy value of animals taken under a subsistence permit. Lifting the requirement of trophy nullification could increase hunting pressure significantly. Effects are unknown, but could include a conservation concern, particularly for muskox. The NPS is obliged to avoid conservation concerns for any species. The proposed changes potentially affect NPS lands in Bering Land Bridge National Preserve, Gates of the Arctic National Preserve and Noatak National Preserve.

Our comments, regarding this proposal fall into three areas as outlined below: 1) public process and input, 2) potential biological and management consequences, and 3) impacts to the Department's ability to best manage these hunts.

1. While the regulation (5 AAC 92.052) has statewide scope, its effects are translated down to specific hunts, specific species, and specific areas, and local subsistence. NPS believes that the appropriate place to address these questions is within the Board Cycle focusing on proposals from specific regions. Local meetings would allow for better public notice and provide a better opportunity for the Board to hear from a broader range of users within the region.
2. Under circumstances that involve a high statewide demand animal or pose special management concerns, trophy nullification may be one of the few options to ensure that the subsistence character of the hunt is maintained and the subsistence opportunity is protected.

The Seward Peninsula Tier I registration muskox hunt is one such case. The muskox population is currently exhibiting trends of concern in some hunt areas including declines in mature bull-to-cow ratios, recruitment, and a decline in overall average annual population growth. There may be a number of factors responsible for these trends. However, as long as the Tier I registration hunt is managed largely through Emergency Order (EO) closures increased hunter demand and effort is likely to result from the removal of the trophy nullification requirement. The problem may only worsen and result in a downward spiral of decreasing allowable harvest levels and shortened seasons. The 2010-2011 hunt year for muskox in GMU 23 Southwest (the Buckland/Deering area) needs to be carefully considered. Compared to the previous year (2009-2010), the allowable harvest was reduced by 50% and the effective subsistence season went from 7.5 months down to 12 days.

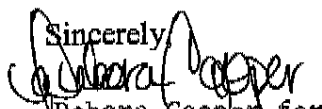


Another situation where there is value in the Department retaining its discretion can be seen in the brown bear subsistence hunt in northwestern Alaska. The Department points this out in their Preliminary Recommendations to the Board on page 58.

3. Finally, given the often complex issues and situations surrounding some of these hunts where subsistence take is a factor, trophy nullification, at the discretion of the Department, and as a permit condition, remains one of the more flexible tools available to the Department. NPS believes Department staff, in coordination with the NPS, is in the best position to determine whether or not to apply trophy nullification as a management tool.

Again, we appreciate the opportunity to provide you with comments on these important regulatory matters and look forward to working with you on these issues. Should you or your staff have any questions, please contact Debora Cooper at (907) 644-3505 or Dave Mills at (907) 644-3508.


Sincerely,


Debora Cooper for
Sue E. Masica
Regional Director

cc:

Cora Campbell, Commissioner, ADF&G
Corey Rossi, Director, Wildlife Conservation, ADF&G
Kristy Tibbles, ADF&G
Pat Pourchot, Special Assistant to the Secretary for Alaska
Geoff Haskett, Regional Director, FWS
Chuck Ardizzone, FWS
Joel Hard, Superintendent, Lake Clark NP&P
Ralph Moore, Superintendent, Katmai NP&P
Paul Anderson, Superintendent, Denali NP&P
Meg Jensen, Superintendent, Wrangell-St. Elias NP&P
Mary McBurney, Acting Superintendent, WEAR
Jeanette Poinrenke, Superintendent, Bering Land Bridge NP
Greg Dudgeon, Superintendent, Yukon-Charley Rivers NP/Gates of the Arctic NP&P
Susan Boudreau, Superintendent, Glacier Bay NP&P
Debora Cooper, Associate Regional Director
Dave Mills, Subsistence Team Leader
Sandy Rabinowitch, Subsistence Manager
Chris Pergiel, Chief Law Enforcement Officer, NPS-Alaska Region



March 1 - 11 

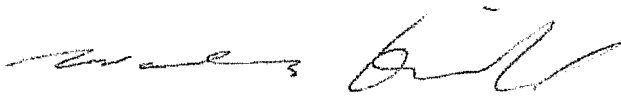
RC20

Proposal #156

English Bay Native Corporation would like to support proposal number 156, which would give an allotment of non resident Mountain Goat tags during current Registration hunt held on English Bay lands.

We feel that by having the allotment available we would be more able to provide services to hunters brought into the area in the fall and create work in the community and utilize some of our rentals ect.

Thanks
English Bay Native Corporation


Wally Kwasnikoff

3/1/2011

RECEIVED
MAR 04 2011
BOARDS



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

February 17, 2011

From: Billie Young
1691 N. Catalina Dr.
Wasilla, AK 99654

Subject: Comments on BOG proposals for March 4-10 meeting

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Proposal #71 - **Support**, if amended to include Units 14A and 14B . If approved, the amended proposal would standardize the sealing requirements for the South Central units in Region IV. If the data gathered from sealing of furs is actually needed and used by ADF&G, then this proposal would provide a more cost effective means of obtaining the information required. Make the fur harvest reports for beaver and marten in these units required the same way harvest reports are required after successful hunts.

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teaching opportunity for youngsters due to the easy access involved. Beavers are typically removed by licensed trappers in the fall or early winter, only to be replaced the following Spring by juvenile beavers dispersing as two year olds down the Knik river drainage. This pattern has been repeated annually for as long as anyone can remember and shows no sign of changing.

Efforts to control habitat destruction by the beavers is a double-edged sword. While attempts to protect trees from cutting by the beavers may have some limited success, depriving the beavers of their food source would ultimately lead to their demise (through starvation) or their relocating to other areas where food is available. Without the use of annual trapping at Reflections Lake, a balance between habitat and a sustainable beaver population is not possible.

Given that beaver trapping at the lake typically occurs in late fall and early winter, the public would still be able to enjoy the sight of beavers in the lake during the Spring and Summer months. Additionally (and contrary to the statement in the proposal), the methods normally used (drowning sets and submerged body-grip traps) to trap beavers minimize the risk of human and pet injuries and lend themselves to there being plenty of safe areas to place traps around the lake.

Proposal #103 - Support. The Intensive Management Plan for Unit 16 appears to be working and the Department should be allowed to build on this success. Please reauthorize the plan.

Proposal #104 - Support. Brings the beaver season in these Units in alignment with the other Units in Central and Southwest, while also providing additional economic benefit to trappers through increased harvest opportunities.

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As for the request of the submitter of this proposal to "make it illegal for dogs being walked or run on state roads and trails on a rope to be trapped", we submit and point out that targeting domestic animals for trapping is already illegal and that no such trapping on the roads occurs. Adding a 50 foot "safety corridor" along state roads and trails would only be the beginning, much like the late "Buffer Zone" around Denali National Park. While the AFTA regrets the loss of anyone's pet to a trap, we maintain that dogs remaining on the roads remain safe and we still concur with the Matanuska-Susitna Borough that maintaining positive control of a pet is the owner's responsibility.

Proposal #198 - Support, if the ADF&G area biologist supports the measure. If approved, this proposal would allow for potential additional harvest of a valuable fur resource.

Proposal #215 - Support, with amendment to include the bonus point system with all permit drawings.

Submitted by: Billie A. Young



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

February 17, 2011

From: Travis Young
2751 Fallbrook
Wasilla, AK 99654

Subject: Comments on BOG proposals for March 4-10 meeting

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Submitted by: David E. Young



Personal Comments: Tad Fujioka

Feb10, 2011

Proposals:192 & 193 comment,194-support, 212-support with amendment, 215-Oppose

Note: I am the chairman and trapping representative of the Sitka AC, but these comments are my own, not official AC positions.

192: I am not familiar with the actual use in this area and am not commenting on the appropriateness of the concept of this proposal. I will leave that to the local residents. If after hearing from them, the BOG believes that the issue that the proposer cites is serious enough to take action, a 50' buffer is probably not unreasonably restrictive to trappers. However, I think that the proposal could be improved by modifying it in two ways. Firstly, the trails subject to this restriction should be listed by name and with beginning and end points so that a both trappers and mushers know where the restrictions apply and do not apply. Secondly, since not all traps are large enough to pose a threat to dogs (let alone people), there shouldn't be a need to restrict use of small (marten-sized) traps, snares, or restrict taking furbearers with a firearm under a trapping license even within 50' of a trail. Even these activities would be prohibited by a blanket ban on all "trapping" in the area.

193: I understand the potential for localized depletion of any natural resource that intensive harvest can pose. If this is a threat in certain portions of Regions II & IV, then some action may well be warranted. However, I'm not convinced that the proposal 193 is the best means of addressing the issue. Part of my doubts are related to the author's apparent confusion between "population" and "population density". The table provided in the proposal that lists the population of different duck species does not (contrary to the author's claim) show that Goldeneyes and Barrows Goldeneyes suffer from a low population density. Likely there is not as much suitable habitat for these ducks as there is mallard habitat. Hence mallards are much more numerous, but within each species' habitat the Goldeneye and Barrow Goldeneye population density may well be healthy. (I don't know whether this is or is not the case, but the population data alone doesn't show since population density is population divided by amount of habitat and no figures are provided on the amount of habitat suitable for each species.)

At any rate, if there are specific areas where there is a high localized harvest of this (or any broadly-utilized) resource, I encourage the Board to adopt the solution that effectively solves the problem with the least disruption to other traditional users. In this particular situation, I would encourage the Board to look at Alternative 3 -Separate Regulations for Commercial Guided Hunts (possibly in conjunction with Alternative 4-Limiting the Restrictions to Where ever the Problem is Actually Occurring) before supporting Proposal 193.

I do not support Alternative 1 (Reclassifying Goldeneyes from the "Duck" category to the "Sea Duck" category) as presumably this would be done state-wide. At least in the part of the state that I am most familiar with, many hunters refrain from shooting Goldeneye in hopes of bagging a more highly prized dabbler. If Goldeneyes were considered to be "Sea Ducks" they would loose this protection and harvest would actually be higher.

194: I strongly support the philosophy behind this proposal, not just for birds, but for hunting (and fishing) in general. While local residents hunt for their own personal and family needs (nutritional as well as spiritual, etc), the harvest from local residents is inherently limited by the our limited numbers. The commercial guiding industry on the other hand knows no such limits except as imposed by the resource or management. If there is profit to be made by adding more clients and there are customers



willing to pay, then absent restrictive regulations, harvest levels will increase to the point that the resource and other traditional users of the resource suffer. Hence it is highly appropriate to limit the allowable take of commercial enterprises to protect traditional local users. To the extent that the local hunters are subsistence hunters, the Alaskan Constitution even requires that this be done. I encourage the Board to continue your culture of providing protection to local traditional users as you have done in the past in particular in regard to a newly emergent commercial user group.

Even if the dept staff do not yet recognize local depletions as occurring in a particular area, that alone is not a legitimate reason for turning down this flexibly written proposal. It would be perfectly appropriate to universally institute separate regulations for guided hunters, but keep those regulations similar or identical to the ones governing non-guided hunters unless competition in an area becomes an issue. This is similar to the way that resident and non-resident (who of course are required to be guided or accompanied) brown bear, mountain goat and sheep hunts are managed. In places where there are plenty of animals to go around, the resident and non-resident regulations are identical, but they are still listed separately. I urge the BOG to extend this philosophy universally from big game to waterfowl instead of only waiting to do so until a problem has occurred and the guided industry has already established a political support base for that hunt.

212- I support the Dept in desiring to retain the potential for antlerless moose hunts in the Gustavus area if appropriate. However, I question the need to authorize as many as 100 such permits. As I understand, the previous need to harvest a large number of cows was brought about (in large part) due to the department's inability or uncertainty of allowing for a reasonable cow harvest in the previous years. Only because of harvest levels well below the optimal level for several years previous did the herd balloon to a point so far from the sustainable ideal. So long as the department managers continue to have the ability to do so, the BOG should assume that the herd can reasonably be expected to be managed well below the point where 100 cow tags is a rational number to be issuing.

Assuming prudent management, the scenario where the Dept would be justified in issuing 100 antlerless tags is so unlikely to occur that it can be dealt with on an emergency basis. Hence, I suggest that this proposal be amended so that the maximum number of tags to be issued is reduced to a more plausible number so that the hunting and non-hunting public is not misled about the size and health of the Gustavus moose herd.

215- I am very strongly opposed to this proposal to establish a Bonus Point system for drawing hunts. This proposal would give a large advantage to those hunters with the financial resources to apply for hunts year in and year out. While some Alaskan residents have the luxury of being able to consider the drawing application fees inconsequential, this is not true for all resident hunters- and certainly not every year, since Alaska is a state with a high level of self-employment and even the established employers are subject to boom-and-bust business cycles. This proposal would generally favor non-residents hunters over residents, and urban residents over rural residents since in each comparison the former tends to be wealthier. By highly favoring applicants who apply every year, the proposal strongly encourages hunters to apply even in years when they may not be able to most fully benefit from getting drawn. (I.e. when injured or when other commitments squeeze their schedule). Hunters who under the current system may opt to not apply until they can take full advantage of their hunting opportunity will feel obligated to apply to retain their point advantage. Any increase in the number of applicants further dilutes the chances that any one individual has of getting drawn. If we want to see more of these highly-sought-after tags being drawn by long-time Alaskan hunters, we should try to discourage non-resident hunters and casual hunters from applying, rather than supporting this proposal which will increase the number



of non-resident applications, thus diluting our own odds. In the long run, Alaskans are better off under the current system than under a bonus point system.

The provision (4.A.6) to allow an applicant to buy bonus points without having any desire to hunt in that year is particularly offensive. While I understand your desire to allow somebody to avoid the penalty of skipping a year when they are not able to hunt, this solution creates a greater injustice by encouraging would-be-hunters to start paying into the system early to stack the deck in their favor. Any change to the current system that allows somebody to buy an additional advantage will inevitably result in more people seeking to capitalize on that opportunity.

Furthermore, if passed, this proposal would particularly disadvantage today's youngest hunters. Those not yet of age to apply for drawing hunts would be forced to wait while other hunters begin to accumulate bonus points. Once finally old enough to apply, their odds would be exponentially longer than most of the rest of the applicants. If these younger hunters decide to go to college out of state during the hunting season, for several years they will have to either buy points by applying and indicating that don't intend to hunt, or again be forced to handicap themselves in future drawings. Please abandon this proposal and avoid putting today's young hunters in this situation.

Sincerely,

Tad Fujioka



Proposal #227 — Make Kodiak goat registration permits more readily available.

I support this proposal.

The current regulation is a way to discourage non-Kodiak residents from hunting with these permits. This segregates Alaska hunters, and discriminates among the same class of users. As much as possible, Alaska hunters should be treated equally, which the current regulation does not do. I have personally decided not to hunt goats with these registration permits because of the extra cost of travelling twice to Kodiak - once to get the permit, and then again to actually hunt. The BOG should not encourage Alaskans to try to exclude other Alaskans from participating in any legal hunt in Alaska - and these type of regulations do exactly that. Permits should be available all over Alaska well before the hunt and also online, as is currently done for many similar hunts.

Proposals #48 — Repeal Community Harvest permit, All resident hunters are Tier I.

I support this proposal.

For the same general reason I supported Proposal #227, I support this simplification of the Nelchina caribou hunt. I realize the State's subsistence law recognizes two divisions of Alaskans - Tier I and Tier II - when dealing with subsistence populations of game animals. Given that constraint, whenever possible I believe Alaskan hunters should be treated equally. I don't think that the male resident hunter behind me over my left shoulder should be treated differently than the female resident hunter behind me over my left shoulder. Nor should I be given more opportunities than either of them. We are all resident hunters, treat us the same.

I believe State Statute is straightforward about when subsistence game populations are in Tier II status and when they are in Tier I status; the ANS number is set to do just that. Because the Nelchina caribou population currently has more harvestable animals than the amount needed for subsistence, all Alaskans are supposed to have an equal opportunity to harvest them. We should not be writing regulations that circumvent the intent of Statutes just to try and pacify different groups of hunters who push the hardest. All the resident hunters in this room, and in Alaska, should now have an equal opportunity to harvest Nelchina caribou.

We are kidding ourselves if we think that by continually looking for legal loopholes in State subsistence Statutes we will, somehow, bring the most benefit to customary and traditional users, and pacify all the user groups. From what I have seen, the recent history of the Nelchina caribou maneuvers have just given more opportunity to those groups with the most money to litigate for their benefit. I have no doubt I could join a group and get together enough money to go to court and win for that group. But we want to be hunters, not lawyers and litigators. And we should be treated equally. I don't think equal treatment is too much to ask of the State of Alaska.

Tony Russ
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RC19

March 1, 2011

Dear State of Alaska Board of Game members,

Regarding Statewide proposal 215:

5AAC 92.050 Required permit hunting conditions and procedures. Re-adopt regulations establishing a bonus point system for some drawing hunts.

I am OPPOSED to 215: I am vigorously opposed to any effort to create a bonus point system for any drawing hunt in Alaska.

The current system is fair and simple and should remain in effect. New and young hunters will have a fair and reasonable chance to be drawn for an opportunity to hunt.

The current system is a very modest cost and the administrative burden easily handled by ADFG – I understand that would NOT be the case for any bonus point system.

I have this position even after applying for a bison permits, intermittently for over 20 years, and recently very regularly, and intermittently for muskox for probably 15 years. I got drawn for bison in 2010 and got an animal Feb 17. I have not yet been drawn for muskox.

It was through my Delta bison permit that I became aware of the bonus point system proposal. I looked into it. I have been told by those with experience in other states, that bonus point systems are **Expensive, Difficult to administer**, nearly impossible to escape once adopted, and worst of all, are designed to benefit a few extremely zealous hunters while **essentially disenfranchising many many other hunters**, especially new young hunters.

In the 9 months I prepared for my bison hunt, I met many folks who have applied, and quite a few who succeeded. Several people mentioned they had applied for anywhere from 10 to 30 years without success. And I met a few who had drawn a permit on their first application or within a few years of first applying. NONE of the people I talked to wished for a bonus point system. They all seemed to accept the current system as fair and reasonable.

I'm 56 years old, born and raised in Alaska. I'm extremely proud that to the extent possible, Alaska has one of the most fair and best systems for providing the public with opportunities to hunt and fish. This bonus point system if adopted, would benefit a very small selfish few to the detriment of the broader hunting public at great expense to the State of Alaska.

PLEASE DO NOT ADOPT 215.

Thank you,

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