

Alaska Board of Game  
Central / Southwest Region  
March 4-10, 2011

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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





# BACKCOUNTRY HUNTERS AND ANGLERS ALASKA CHAPTER



www.alaskabackcountryhunters.org

## Comments to the Alaska Board of Game Spring 2011 Region IV Meeting

Proposals we SUPPORT: 59, 70, 87

Proposals we OPPOSE: Bear Conservation Policy, 25, 41, 77, 103, 106, 122, 223

### Findings of the Alaska Board of Game Bear Conservation , Harvest, and Management Policy

#### OPPOSE

For many years the Board has wisely been very careful to distinguish between what is fair chase “hunting” and what is known as “control.” And the Board has always ensured that any bear “control” efforts were conducted under the provisions of a formal bear control implementation plan for specific areas.

But with this new policy the Board is saying that black bear trapping and the incidental catch of brown/grizzly bears, the taking of sows with cubs and cubs, the use of helicopters to transport bear hunters and their gear, and the spotting of bears from the air and landing and shooting the same day, can be done as part of a general hunting provision.

As a hunting and fishing conservation organization that strives to promote fair chase hunting practices and principles, the Alaska chapter of Backcountry Hunters & Anglers is deeply saddened by the new provisions within this new bear Policy that will legalize under general hunting provisions things that are contrary to any notion of fair chase hunting practices and ethics.

We see absolutely no reason or rationale to allow any of these provisions in the new bear Policy to be conducted outside the process of a formal bear control implementation plan drafted by the Department. The Board has passed numerous bear control programs using that process. There is no reason to believe they cannot do the same in future, and keep these highly controversial methods and means separate at least from what is considered to be “hunting.”

We urge the Board to reconsider passage of this new bear Policy.

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**Proposal 25** – 5AAC 85.020 Hunting seasons and bag limits for brown bear, and 92.132 Bag limit for brown bears.

### **OPPOSE**

Currently in Unit 19A and 19D nonresidents can harvest two brown/grizzly bears per year. The rationale for that nonresident bag limit was to ostensibly increase harvests in certain areas where bear predation on moose calves was at high levels, in order to boost moose populations.

Very few guided hunters so far have taken advantage of this new two-bear limit in parts of Unit 19.

If the Board wants to see more brown/grizzly bears harvested in certain areas in order to effectively increase moose and/or caribou populations, which seems to be the main intent of this proposal, allowing guided nonresident hunters to harvest two bears per year in certain units has absolutely no efficacy.

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**Proposal 41** – 5AAC 85.020 Hunting seasons and bag limits for brown bear; and 92.044 Permit for hunting black bear with the use of bait or scent lures.

### **OPPOSE**

In the past, other than under a formal brown/grizzly bear control implementation plan, the Board and the Department have always opposed the taking of brown/grizzly bears over bait.

In spring of 2009 there were proposals to allow the taking of brown/grizzly bears over bait in several units, including Unit 13. Proposal 75 was one such proposal for Unit 13 and the Department recommended **do not adopt** using, in part, this rationale:

*“Brown bear harvest has increased in GMU 13 since hunting regulations were liberalized. The yearly harvest has gone from an average of 84 a year in the early 1990s to 138 a year since 2003.... While baiting is the only option for taking black bears in heavily timbered habitats, there are other ways to harvest brown bears over most of Unit 13.”*

Proposal 166 (also from spring 2009) asked to allow brown/grizzly bear baiting as part of the Unit 16 bear control program and even there the Department recommended **do not adopt**, using this rationale:

*“Although there has been a two brown bear bag limit in effect in Unit 16B since 2005, there is not a brown bear control program in Unit 16 and as such the department is opposed to taking of brown bears over bait.”*



Those proposals did not pass and we don't believe anything has changed since 2009 that would sway the Board to suddenly support the taking of brown/grizzly bears over bait to increase hunting opportunities.

As far as any dangers or hazards, brown/grizzly bears visit black bear bait stations across much of the state, and Unit 13D (and that habitat) is in no way unique in this regard. To conclude that this makes black bear bait stations somehow unsafe or dangerous is disingenuous, when the only thing that makes black bear bait stations hazardous or unsafe or dangerous to hunters or their children, because brown/grizzly bears may be lured into those baits/lures, is the bait station itself.

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**Proposal 59** – 5AAC 85.045(11) Hunting seasons and bag limits for moose.

**SUPPORT (but amend season dates)**

AK BHA continually advocates for youth hunting opportunities prior to the school season. One of the benefits the Department described in this proposal is that this *“early season will also be beneficial to families wishing to take children hunting prior to the start of the school year.”*

The suggested season dates in this proposal are Aug. 19 – 25. **However, classes in the Anchorage and Fairbanks school districts begin on Aug. 18.**

We agree with a 7-day season length but would **recommend the season runs Aug. 15 – 21**, so indeed the youth we so desperately need to carry on our hunting traditions have a few days to take advantage of this hunt before school starts.

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**Proposal 70** – 5AAC 92.540 Controlled use areas.

**SUPPORT**

The growing prevalence of river boaters hauling ATVs to use off river is creating problems and conflicts in some areas. We are seeing more and more advisory committees coming to the Board with these types of issues.

We support this common sense proposal from the Paxson Advisory Committee.

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**Proposal 77** – 5AAC 92.125 Predation Control Area Implementation Plans.

**OPPOSE**

AK BHA is on the record strongly opposing all foot snaring of brown/grizzly bears, and we are dismayed that the Department, after clearly stating in the past that black bears were the primary source of moose calf mortality in Unit 16, and after reports show increases in moose densities and moose calf survival in Unit 16 after years of both wolf and black bear control and very liberalized black and brown/grizzly bear seasons and harvests, now suddenly supports the snaring of brown/grizzly bears in any part of Unit 16, as stated in the Department recommendations for this proposal.

We are highly skeptical with any results from an ostensible one-year research study in a very small area of Unit 16B in the Shirleyville area that claim the exact opposite of what ADFG has presented in the past to rationalize the black bear foot snaring control program currently in place.

We continue to **strongly** oppose any snaring of brown/grizzly bears in any area of the state, even as part of a bear control implementation plan in a limited area.

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**Proposal 87** – 5AAC 85.045(12) Hunting seasons and bag limits for moose

**SUPPORT**

We support this proposal but ask that there is more specificity in the caliber of shotgun and type of ammunition (slug only) used.

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**Proposal 103** – 5AAC 92.125 Predation control areas implementation plans

**OPPOSE**

We cannot support the continuation of this predation control plan if it includes the foot snaring of black bears and helicopter transport of “hunters” to bait stations or bait station “camps.”

**We strongly oppose any inclusion to include the foot snaring of brown/grizzly bears, even in a limited area, especially in light of the fact that the moose population and calf recruitment is increasing.**

Please also refer to our comments on Proposal 77.

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**Proposal 106** – 5AAC 84.270 Furbearer trapping.

**OPPOSE**

AK BHA continues to strongly oppose any trapping of black bears by the public in sympatric ecosystems where brown/grizzly bears are also present.

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**Proposal 122** – 5AAC 92.052 Discretionary permit hunt conditions and procedures.

**OPPOSE**

We cannot fathom why the Board would seek to repeal Department discretionary permit hunt authority, as this Board proposal clearly states that the “use of these permit conditions allows the department to manage hunts to provide maximum opportunity, and still provide protection of the resource.

The way this proposal is worded implies that the Board believes that maximum opportunity and protection of the resource is a bad thing. **If a hunter does not wish to comply with any permit hunt conditions, then that hunter should not apply for those permit hunts.**

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**Proposal 223** – 5AAC 92.052 Discretionary permit hunt conditions and procedures.

**OPPOSE** (and defer to proper in-cycle meeting)

This proposal affects all statewide subsistence permit hunts with trophy destruction provisions, for Unit 22, 23, 12, 21, and 24, none of which are in Region IV. We cannot understand why this proposal is to be heard at a Region IV meeting, out of cycle, when those it may affect the most can't likely attend and be heard.

We oppose this proposal on the grounds that these subsistence permit hunts that require trophy destruction are working to limit applicants yet still provide maximum opportunity and sustainability for subsistence hunters who want a quality hunt and want to put healthy game meat on the table. We also recommend that this proposal be deferred to the proper in-cycle statewide or regional meeting.

---



Thank you for the opportunity to comment on these proposals and for all the work and service every Board member provides to Alaskans concerned about our wildlife resources.

Mark Richards co-Chair AK BHA  
Dave Lyon co-Chair AK BHA  
Alaskabha@starband.net



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

RECEIVED  
FEB 18 2011  
BOARDS

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

Re the Findings of the Alaska Board of Game 2011-XXX-BOG related to Bear Conservation, Harvest, and Management Policy.

Dear Members of the Board of Game,

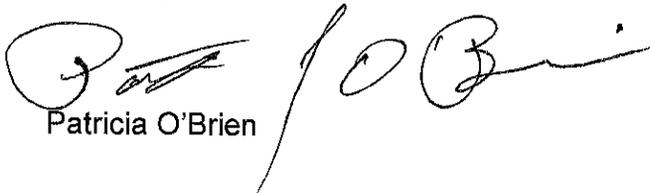
I have elected to limit my comments on this document to the goals.

Goal # 2 appears laudable: *Recognizing the ecological and economic importance of bears while providing for their management as trophy, food, predatory, and furbearer species.* The goal however is confusing, because only the last half of that goal seems to be emphasized in the draft policy. "Recognizing" is not sufficient. The policy must spell out how the ecological and economic importance of bears will be supported and carried out.

For example, in the Southeast BOG meeting the Board heard many proposals to conserve bears, because of their high value for wildlife viewing. Ecotourism is booming in Southeast Alaska and growing across the state. Bears – of every kind have far greater value for wildlife viewing than as trophies or for their fur. No mention is made of tourism. No detail is provided to enhance this accelerating economic opportunity in Alaska. For that reason the policy seems out of date and not in Alaskan's best interest.

I strongly recommend that the economic value of these animals be explored and a report issued to the Board of Game, so that an updated policy, more in line with the economic future of Alaska, may be drafted.

Sincerely,

  
Patricia O'Brien



February 15, 2010

re: PROP 232

to the Alaska State Board of Game:

I am a resident of Healy, Alaska and I am writing to voice my opposition to Proposal 232 to open the Yanert to the antlerless hunt. Support hunting & subsistence use for all Alaskans but this proposal is misguided, short-sighted, and vague. It will introduce potential gray areas that threaten public safety & experience of the lands.

In addition to specific objections based on practical concerns (absence of visitor-use infrastructure, one 17b access point on the Parks Hwy, destruction of habitat, sensitive wetlands, lack of plan to monitor & enforce increased use), I also object to the fact that this Interior Proposal is being addressed at a meeting far outside the geographic region. Many residents are unaware of the issue & will be unable to attend the process to give input. At very least, please schedule Proposal 232 to be considered at an Interior BOG meeting.

Thank you for your consideration.

Sincerely, 

reply to:  
cmbyl@wildmail.com



February 14, 2011

Alaska Department of Fish & Game  
Boards Support Section 907-465-6094  
PO Box 115526  
Juneau, AK 99811-5526

Attn: Board of Game Comments  
Alaska Department of Fish & Game  
Boards Support Section

Proposal #Proposal 232

RECEIVED  
FEB 18 2011  
BOARDS

As a local resident, living near the confluence of the Yanert and Nenana Rivers, I strongly oppose Proposal #232 which would open the Yanert CUA to motorized access for these reasons:

- 1) According to the latest ADF&G survey, Zone 7, of Unit 20A has the lowest density of moose in the entire management unit. It is bad wildlife science and bad management to open this area to motorized access that would surely increase the harvest. I see very few moose in this immense area and an increase is unwarranted.
- 2) The proposal would allow the ADF&G to raise the quota(s) for antlerless moose hunting in the late autumn and winter. Access is a huge issue as there is only one grandfathered BLM access route across AHTNA Corporation land that borders the highway from nearly the Denali Park boundary to near Carlo Creek. There is no roadside parking, pullouts, or facilities to facilitate the large crowds of mechanized hunters that have plagued the Rex-Ferry areas. This lack of access inevitably results in overcrowding, with negative public consequences. Currently extreme overflow on the Yanert River restricts any access to the upper region of the river. This not unusual winter condition would then concentrate hunting to areas close to the road where moose density is negligible.
- 3) Last, this proposal for Interior Alaska comes at a time when the Board is supposed to be considering Southcentral issues. To consider it now, without considered input from the Middle Nenana Advisory Committee is setting a dangerous precedent.

For these, and others reasons, I urge the Board to reject Proposal #232.

Sincerely,

  
Tom Walker

PO Box 146

Denali Park, Alaska 99755



2.13.11



Ms. Lydia Garvey  
429 S 24th St  
Clinton OK 73601-3713

Humane Society Legislative Fund

Dear B of G Comments  
AK DF+W,

I strongly urge you to NIX changes to  
Wolf + Bear management! AND any  
such changes need to go through a  
full Public process, - incl. local + B  
Advis. Comm.'s!

Predators are vital to ecosystem  
balance. Stop the war on our Wildlife!  
Do your job - Protect Our Public waters,  
lands, wildlife, economy, taxes +  
health!

Your attention to this most  
urgent matter would be much  
appreciated by all present + future  
generations of all species.

Thank you;

Public  
Health  
Nurse

RECEIVED  
FEB 18 2011

BOARDS



To: Alaska Board of Game  
Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811-5526  
FAX: 907-465-6094

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FEB 18 2011  
BOARDS

February 12, 2011

Dear Board of Game Members,

I am writing in opposition of Proposal 232. I feel that in the Board of Game's justification for Proposal 232 inadequately addresses the possible impacts, and as such is uninformed. Impacts, such as destruction of tundra and other sensitive habitats by ORV use, would most certainly occur. Incidentally, this is the same habitat, which is vital for the species intended for harvested by Proposal 232.

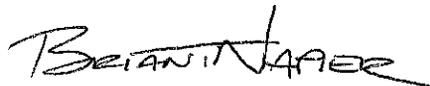
Additionally, the proposed access point for motorized use does not address the issue of parking, human waste and garbage removal to this area, which will certainly create undesirable social impacts, to local residents and long-time recreationalist, as well as the intended benefactors of this Proposal 232. The idea that dilution is the solution to negative social impacts, such as resource damage is folly, only appropriate and thoughtful pre-planning can prevent undesirable social impacts, such as human waste and garbage.

Finally, I believe, that introduction of such a proposal as, Proposal 232 should occur during the Interior focused Board of Game, where impacted users have a fair opportunity to express their concerns. The Board of Game should at the very least table this proposal till the Interior focused meeting.

Thank you for you time and consideration.

Sincerely,

Brian Napier



Resident:  
Panguingue Creek Subdivision  
Healy, AK 99743  
bnapier\_ak@hotmail.com



RECEIVED  
FEB 18 2011  
BOARDS

Alaska Board of Game  
PO Box 115526  
Juneau, Alaska 99811-5526  
FAX: 907-465-6094

February 13, 2011

Dear Alaska Board and Game,

I do not support Proposal 232 to open the Yanert Valley to motorized hunting. Opening this area to such use will introduce management problems rather than eliminate them, as the proposal suggests. At the very least, this proposal should be addressed at the appropriate regional meeting, at the interior BOG meeting.

Thank you for your consideration in this matter.

Sincerely,

*Molly McKinley*

Molly McKinley  
Area resident  
[mckinlm@yahoo.com](mailto:mckinlm@yahoo.com)  
907-683-0503





Post Office Box 32712 • Juneau, Alaska 99803

Telephone: (907) 789-2399 • Fax: (907) 586-6020

RECEIVED  
FEB 17 2011  
BOARDS

February, 17, 2011

To: Alaska Board of Game

From: Territorial Sportsmen, Inc.

Subject: Proposals #50 & #204

The Territorial Sportsmen Inc. (TSI) oppose proposal numbers 50 and 204 that will be considered at the Board of Game meeting March 4-10, 2011.

Applying the community harvest concept, in this form, to the Nelchina basin caribou population is extremely dangerous because it will encourage a greatly expanded effort to qualify all communities with residents that have traditionally utilized this population. The historical data shows that previous Nelchina caribou users exist throughout much of the state. It would be no problem, for instance, to put together the justification and, we believe, legal right for Juneau to request a community harvest quota under the proposed guidelines.

The state should avoid ever allocating resources to a community or ethnic group. Harvest permits should be issued only to individuals by the state. If the Board wishes to implement some type of community harvest system, apply the concept proposed by the Board several years ago to allow permit holders to consolidate their permits in a



community into a community harvest system which would allow a type of community proxy system closely controlled by Fish and Game.

Proposals 50 and 204 place another tiered priority on top of or in combination with the existing subsistence tier 1 permitting system. If this proposal is ruled to be constitutional by the courts, a whole new schism between Alaskan residents will very likely occur.

The Territorial Sportsmen oppose proposal #50 and #204.

The Territorial Sportsmen is a Juneau based organization that promotes fish and wildlife conservation and hunting, sport fishing and trapping. We have about 1800 members.

Sincerely,



Wayne Regelin

President, Territorial Sportsmen Inc.



ATTN: Board of Game comments  
At Dept of Fish and Game  
Boards support section  
PO Box 115526  
Juneau AK 99811-5526

RECEIVED  
FEB 17 2011  
BOARDS

John Jochwal  
1749 Gillette St  
Fairbanks AK  
99709

members of the board:

My name is John Jochwal, I  
reside in the Fairbanks area and have lived in  
interior Alaska all of my 53 years.

I am writing you in regards to  
proposal 232 which would open the Game controlled  
use area to seasonal motorized hunting. I am  
against this proposal.

I have hunted the Game CUA from  
the midseventies to the present. I have been on  
foot, ski and dogteam during these hunts. Most  
of them in winter. I harvested a moose there  
last February, 2010.

I hunt for meat, I do



own a snowmachine or ATV. The few  
controlled use areas in Alaska are very important  
places to hunters like myself. Please do not  
sacrifice the valuable merits of the spawnt CUA  
simply to give mostly urban based ~~motorized~~ <sup>motorized</sup>  
hunters more access to a moose population  
that is already available to them. They can hunt  
the rest of unit 20 a or can simply leave  
their machines at home and hunt the spawnt.

Please do not pass a proposal that will  
weaken the important role that CUA areas play  
in meat on the table for the many hunters  
who can not or prefer not to hunt with a  
machine. Thank you  
John  
Jochims



ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section

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FEB 16 2011  
BOARDS

February 12, 2012

To the Board of Game regarding Proposal 232. Controlled Use Areas.

Please do not allow any motorized vehicle access for hunting in the Yanert Controlled Use Area in Unit 20.

My name is Nan Eagleson; I have lived at Mile 228 Parks Highway, right across from the sole 17B easement to the Yanert, since 1992. I have been on the Middle Nenana Fish and Game Advisory Committee for the past 6 years and was recently elected to serve for the next 3 years. I am an avid outdoor recreationist and spend literally hundreds of hours dog mushing in the winter and hiking, harvesting berries and mushrooms and occasionally hunting in this area.

Allowing motorized vehicle use after September 30 will only bring the impacts of the Ferry and Rex Trails to this area. This is one of the few areas where people, who are motivated enough, can make the effort to hunt in quality wilderness surroundings. Many locals use this area year round hunting by dog team or skis for moose and ptarmigan, by foot in fall for caribou, pick berries, harvest mushrooms and know the lay of the land intimately and use it respectfully

If this Proposal is going to be made it should only be considered during a year when Interior Proposals are considered. This is out of cycle and made by an AC that does not represent the local area. No one in this area knew this was coming and it has huge implications.

I suspect many of the folks on the Fairbanks AC are not familiar with this area if they think they can come here and avoid problems with open water; the Yanert has incredible overflow problems in winter, as does Revine Creek, Teng Creek, Moose Creek and most of the drainages that flow into the Yanert. I am out there all the time by dog team and have seen multiple people stuck in overflow, encountering serious problems. I was on an Avalanche rescue in this area 2 winters ago and recognize lots of challenging terrain where people have or may create dangerous situations. This area is not known for heavy snowfall and the impact of snow machines or OHVs on this habitat, particularly ridges and high alpine areas (where the few moose are) will be highly detrimental. The added stress on sheep, caribou, and moose in the fall and winter by motorized vehicles will create a long term toll on these populations. None of this can be justified.

Past surveys performed by F&G show this area has a very low density of moose. I do not believe the impact on habitat by motorized vehicles can justify the limited numbers of moose that may increase harvest quotas, artificially set by Intensive Game Management mandates.



There are huge problems with access in the Yanert already. I counted 17 pickup trucks with trailers parked in various ways along the highway just from the bottom of my driveway during this past fall's hunting season. There is no safe place to park and to increase this use would be negligent and dangerous. I pick up bag loads of trash, catch loose horses and find people parked and camped on my property if I am not home to respectfully ask them to leave. I have had one of my premier lead dogs shot by a hunter while trying to help his buddy jump start his truck, on which he had let the battery run down. His buddy thought my dog was a wolf and shot it right before my eyes. This has been documented.

Thank you for considering the non motorized recreational values of this area for its residents. I hope there can remain a few undestroyed areas for hunters who seek solitude, maintain the ethic of fair chase, appreciate the integrity of intact habitat and enjoy wildlife for more than just its consumptive values.

Thank you,

Nan Eagleson  
PO Box 114  
Denali Park, AK 99755

907-683-2822



February 12, 2011

ATTN: Board of Game Comments  
AK Dept. of Fish and Game, Board  
P.O. Box 115526  
Juneau, AK 99811-5526

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ATTN: Board of Game Comments

**I strongly oppose Proposal #50**

The federal subsistence law reigns on federal lands in Alaska (about 64% of Alaska).

The federal law says only rural residents can be subsistence users of fish and game and other renewable resources on federal lands. Rural residents must be given a subsistence priority over others. Their uses are considered "customary and traditional" (C&T). The priority is not triggered by a shortage of the resource...that is a popular myth.

"Is it Only in Times of Shortage?"

The state law says all Alaskan residents are eligible for subsistence hunting of game populations.

A great disparity already exists between "rural" and "non-rural" resident opportunity in Unit 13. A needlessly greater disparity will exist if the BOG approves the CHP.

Only about 25% of Alaska lands remain in which "common use" and "equal opportunity" can actually apply in practice. **The State should not forfeit those protections in the Copper River Basin -- or on any other lands or waters through this "backdoor" CHP approach.** Enough is enough already!

**I support Proposal #48, a repeal of any CHP hunt.**

Sincerely,



Sharon Harris  
6841 E. 3<sup>rd</sup> Ave.  
Anchorage, AK 99504



Subject: Proposal #70-5AAC92.540

After hunting, on the Denali Hwy, my observations have been the ATV's are well organized and do not abuse the area like I have seen done in the lower 48.

As there is already another non-motorized area so close to this area, I believe the people that want to hunt without an ATV can use that area.

Also, I haven't seen any new trail being developed. The trails around the bogs have been changed, but have not seen any that have been lengthened.

The above proposal suggest that we need a "safe-haven area for moose" I thought that the "Clearwater Control Use Area" was for that?

I am opposed to Prop #70

Sincerely,

  
Ray Pritchard  
2278 Sorbus Way  
Anchorage Ak 99508

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FEB 16 2011  
BOARDS







# ALASKA CENTER *for the* ENVIRONMENT

807 G Street, Suite 100 Anchorage, Alaska 99501  
907-274-3632 [valerie@akcenter.org](mailto:valerie@akcenter.org) [www.akcenter.org](http://www.akcenter.org)

RECEIVED  
FEB 15 2011  
BOARDS

Re: Bear and Wolf Conservation, Harvest and Management Policies

February 10, 2011

To Chairman Judkins and the Members of the Board of Game,

Thank you for the opportunity to comment on the proposed changes to the Bear and Wolf Conservation, Harvest and Management Policies. 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.

Alaska Center for the Environment is an advocate for sound and balanced wildlife management, as well as an informed process where the public has a meaningful opportunity to influence public policy. This is certainly not the case for the proposed changes to the Wolf and Bear Conservation, Harvest and Management Policies. This board is quietly making sweeping changes in state policy with the minimum amount of notice and comment, thus paving the way for increasingly controversial, risky and unprecedented methods of taking wildlife.

ACE submitted a proposal in response to these policy changes. Our proposal was denied on the grounds that these were "policies" and not "regulations". I've enclosed a copy of each for your review. This splitting of legal hairs is a blatant disregard for the public process and creates a climate of distrust.

The BOG process was established by the legislature to empower the residents of the state, to allow residents to have fair and equal representation when developing wildlife management policy in Alaska. Certainly, the most contentious issues, such as wolf and bear management policies were never intended to be the sole discretion of the seven members of the Board of Game.

We maintain that since this is a statewide issue, that will likely affect wolf and bear populations in every region, that the BOG should postpone this decision until the next statewide meeting in 2012. A regional meeting is not the appropriate place to make changes of this magnitude that will have wide-ranging impacts to bear and wolf populations across the state. The new proposed policies should be publically noticed in the call for proposals and a full public participation process should be invited in developing a new bear and wolf policy.

The Board is considering significant changes to the current Statewide Bear and Wolf Conservation, Harvest and Management Policies that was adopted unanimously in 2006. The Alaska Center for the Environment opposes the board considering the current amendments for the following reasons:

1. The issue is a statewide issue. The ADF&G has not followed the required regulatory procedures for addressing this issue out of cycle. The department has not met the requirement of a finding of emergency warranting taking action on this issue out of cycle. A Regional meeting is NOT the appropriate place to make changes of this magnitude that will have wide-ranging impacts to bear populations across the state.



2. The Board actions have disenfranchised the public and the citizen advisory council's right to fully participate in this issue. The call for proposals for the March Central / Southwest region meeting did not announce the board would consider amending the bear management policy or request public proposals on the topic.
3. The ADF&G lacks the scientific data including accurate scientific population estimates to justify the proposed methods. Additionally, it is unlikely the department will make it a priority to conduct accurate population estimates or devote the resources to effectively monitor intensive management of bears and wolves. Without this fundamental scientific data and ability to monitor such aggressive techniques as those being proposed, ACE feels that the long term integrity of the bear and wolf populations is at great risk by these proposed amendments.
4. The removal of conservation-related language, such as minimum scientific standards and diminishing the importance of viewing wildlife, in the proposed draft bear and wolf management policy concerns us greatly. This change in language illustrates clearly the Board's intentions concerning the future viability of bears and wolves in Alaska. To manage these species so intensively without scientific justification or any regard to the impacts on an ecosystem-wide scale shows an alarming lack of balance and foresight.

#### **Bears-**

Though the new policy states that one of the top 3 goals is to "Recognize the importance of bears for viewing, photography, research and non-consumptive uses in Alaska" there is nothing in the body of the policy to indicate that this goal will be pursued. Indeed, the opposite seems apparent-that every effort will be made to reduce bear populations across the state without regard to the economic, biological and cultural importance of bears. The Board admits that currently the interest in viewing bears far exceeds the opportunities now provided, yet fails to provide any leadership or guidance in addressing this disparity. However there are numerous provisions for providing for greater harvests using controversial methods. The Board has abandoned any pretense of balance and has in the process ignored the many Alaskans who value wildlife and believe that science and not politics should be the backbone of our wildlife management policies.

We **oppose** methods that would allow the public to kill bears using any of the following:

- Trapping, using foot-snares, for black bears under bear management of predator control programs.
- Incidental takes of brown or grizzly bears during black bear management or predator control programs.
- Use of communications equipment between hunters or trappers.
- Sale of hides and skulls as incentives for taking bears.
- Diversionary feeding of bears during ungulate calving seasons.
- Use of black bears for handicraft items for sale, except gall bladders.



- Use of grizzly bears for handicraft items for sale, except gall bladders.
- Taking of sows accompanied by cubs and cubs.
- Same-day-airborne taking.
- Aerial shooting of bears by department staff in moose and caribou calving areas.
- Suspension or repeal of bear tag fees.
- Use of helicopters for transporting hunters and their equipment.
  - Baiting of grizzly and black bears

**Wolves** – There is no language in the new policy that would require the Department to justify using wolf control as a management tool. Even in the absence of any kind of census or evidence that wolves are the cause of a lower ungulate harvest, (studies show they rarely are the sole cause of declines) ,or that wolf control will result in higher ungulate harvest, the Board will have the authority to implement wolf control.

We do approve of the language that recognizes that the Board may occasionally have to restrict consumptive uses when conflicts among non-consumptive uses are frequent. However, since this statement is prefaced with “non-consumptive and consumptive uses are in most cases compatible...” we question the veracity of this statement. Imagine for a minute that there is a new rule that says every time an ACES hockey player fouls, they are removed from the game permanently. It wouldn’t take long for all of those sitting in the bleachers watching the game to be sorely disappointed resulting in reduced attendance at future games.

We would like to see some language that elevates non-consumptive uses above consumptive uses in areas where there are economic, cultural and biological incentives.

We **oppose** methods of kill that would allow the following:

- Expanding public hunting and trapping into seasons when wolf hides are not prime. This is a wasteful policy and contrary to the wanton waste laws. This would also allow hunters to shoot and trap wolves during the summer months when pups are dependent on adults and when wolf packs are more vulnerable due to newborn pups.
- Use of baiting for killing wolves.
- Authorizing the aerial gunning of wolves by the public.
- Locating, chasing, landing and shooting wolves with aircraft by the public.



- Denning of wolves, using poison gas to kill wolves and pups in the den, surrounding dens with snares, and killing female wolves during the pupping season. Even in video games which are notoriously violent, you lose points for killing babies.
- “Encouraging” the Department to hire or contract with wolf trappers and other agents who may use one or more of the method listed here. This language should be clarified.
- Allowing removal of over 70% of the wolf population. There is evidence that this level of harvest is not sustainable.

It is highly likely that bears and wolves will become a diminished resource as a result of the new policy. More people and pets will be faced with a public safety issue from trapping and increases in juvenile, immature bears. The tourism industry will suffer. The classification of bears as furbearers is a wasteful and inappropriate use of the resource and is at odds with bear management policy since statehood that recognized the special status of bears to the residents of Alaska.

The proposed changes to the current bear and wolf policies would broadly expand the power of the Board of Game to develop regulations on management of both black and brown bears and wolves. These regulations will be adopted in the absence of recognized scientific management policies and biological justification through the use of highly controversial and risky harvest practices like bear snaring, that haven't been allowed since statehood. Such sweeping changes need to be done in the light of day with a full public process.

Sincerely,



Valerie Connor

Conservation Director  
Alaska Center for the Environment  
807 G Street, Suite 100  
Anchorage, Alaska 99501  
(907)274-3632  
[valerie@akcenter.org](mailto:valerie@akcenter.org)





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

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

The proposed changes to the current bear policy would broadly expand the power of the Board of Game to develop regulations on management of both black and brown bears in the absence of recognized scientific bear management policies and biological justification through the use of highly controversial and risky harvest practices.

**It is highly likely that bears will become a diminished resource as a result of the new policy. More people and pets will be faced with a public safety issue from trapping and increases in juvenile, immature bears. The tourism industry will suffer. The classification of bears as furbearers is a wasteful and inappropriate use of the resource and is at odds with bear management policy since statehood that recognized the special status of bears to the residents of Alaska.**

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

If the board is interested in amending the existing bear management policy they must schedule the topic for the next statewide board meeting in 2012, publicly notice this topic in the call for proposals, and invite full public participation in development of a new bear management policy. The board cannot justify discussing this issue out of cycle without making a finding of emergency warranting its discussion and fully engaging the public through formal announcement and a call for proposals..

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

Yes, the proposed action recognizes the rights of the public to fully engage the Board on developing wildlife management policy, especially fundamental policies such as this. This is the intent of the legislature when the board process was authorized.

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

**A. Who is likely to benefit if your solution is adopted?** Alaskans who prefer scientific management of our wildlife resources, and who want to participate in the public process. Broad public support for the boards decisions must prioritize full participation by the public

**B. Who is likely to suffer if your solution is adopted?** No one. There is no pending emergency warranting this issue be considered out of cycle.

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

Making amendments to the new proposed policy, but rejected them due to a perfectly acceptable policy that is currently in place.

**DO NOT WRITE HERE**

Submitted By: Valerie Connor

Name / Signature



Individual or Group Alaska Center for the Environment

Address 807 G St. Ste. 100

City, State Anchorage, AK

ZIP Code 99501

Home Phone

Work Phone 907-274-3632

Email valerie@akcenter.org



# STATE OF ALASKA

## DEPARTMENT OF FISH AND GAME

### BOARDS SUPPORT SECTION

SEAN PARNELL,  
GOVERNOR

P.O. BOX 115526  
JUNEAU, AK 99811-5526  
PHONE: (907) 465-4110  
FAX: (907) 465-6094

December 30, 2010

Valarie Connor  
Alaska Center for the Environment  
807 G Street, Suite 100  
Anchorage, AK 99501

Dear Ms. Connor,

Thank you for the proposal you submitted to the Board of Game for the Spring, 2011 meeting concerning the bear management policy. The request did not make the Call for Proposals because it does not propose a regulatory change, nor did the Board of Game open the Call for Proposals for changes to the bear management policy or other policies.

I will forward your proposal to all of the Board members so that they are aware of your comments. You are encouraged to submit comments to the Board of Game on the bear management policy for their consideration at the spring 2011 meeting.

Sincerely,



Kristy Tibbles, Executive Director  
Alaska Board of Game



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FEB 18 2011

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

February 18, 2011

Comments on Proposal #50

The Tanana Valley Sportsmens Association is opposed to this proposal on community harvest and Tier I caribou hunting conditions in GMU 13. Members of our association have long hunted the Nelchina Caribou Herd including many who have nearly always qualified under Tier II. The new rendition of this hunt, including the community hunt requirements will beget another disaster for the department in the tracking of permits and harvest reports.

When the board authorized the concept of community hunts it was never intended for regional use. The whole idea of having a community administer a hunt for their needs is out the proverbial window with this region wide proposal. Those of us who buy licenses and support this system object to spending our money in this manner. Having a village, community or native corporation take care of their own permits, i.e. put out energy in their own behalf is one thing. Having the department take on that responsibility is not appropriate and certainly not fair to the rest of us.

We prefer a simple Tier 1 hunt. A registration hunt can be closed when harvest quotas are met even if there are several hunt periods. (Fall, Winter, etc.) A Tier 1 drawing would allow long seasons but would need a lot more permits in the "up to" language. This year for example, the population is high enough to support well over 3,000.

Subsistence hunting should never limit hunters to one population except during a specific season. It would be greatly beneficial, for example, if unsuccessful hunters in the Nelchina could harvest in the high moose population subunit hunts that run late in the year in GMU 20A and 20B. Ahtna may have stipulated to a single GMU hunting restriction but it never has been the practice for hungry hunters.

Please record our comments in the Opposed column for proposal #50.

Thank you for the opportunity to comment.



Grant Lewis, President, TVSA



February 11, 2011

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Governor Parnell and Commissioner Campbell:

*I strongly urge you to rein in the Board of Game. The new harvest rules for black bear, brown bear and wolves that are being considered are cruel and unnecessary. I value wildlife for a thousand reasons and one of them is not how they taste.*

Being completely made up of hunters and trappers, the BOG fully excludes my interests as a "non-consumptive" user. Their process is abysmally unworkable and unfair and has been for years. The BOG is an unruly nasty child.

Thanks to the arrogance and ignorance of Young and Palin, the legacy of aerial wolf hunting, and the State's schizophrenic demand that the Federal government leave us alone but leave us money, Alaska endures a poor reputation in America. You are both politically savvy, please help stop the embarrassment I feel every time I have to explain Alaska's quirks.

Stop these extreme proposals and rework or terminate the BOG.

Sincerely,



Mark Luttrell  
Box 511  
Seward, AK 99664



Thomas C. Rothe  
11828 Broadwater Drive  
Eagle River, Alaska 99577  
Tel: (907) 694-9068 Fax: (907) 694-9069  
E-mail: [tom.halcyon@gmail.com](mailto:tom.halcyon@gmail.com)

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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 5, 2011

Att: Alaska Board of Game  
ADF&G

Here is my response to the proposals listed for GMU 17, followed by a brief summary.

In response to proposal 25, I am in favor of a two brown bear annual bag limit.

Proposal 26, I am against.

Proposal 27, I am against.

Proposal 28, I am against.

Proposal 29, I am against.

Proposal 30, I am against.

Proposal 31, I am against.

Proposal 32, I am against.

Proposal 33, I support.

Proposal 35, I am against.

Proposal 36, I am against.

Proposal 38, I am against.

I was privileged to witness the high game populations found in GMU 17B from 1996-2000. Unfortunately, I also witnessed first hand the crash of moose and caribou numbers since 2000. Many proposals calling for change, some good, some not so good, have come and gone. A couple of these concerned conservationists/individuals submit their ideas in this current cycle. The Alaska Board of Game archives provide a clear "chronology of

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proposals” calling for sweeping changes in order to stop the decline in moose and caribou numbers. The Alaska Department of Fish & Game Hunting Proclamation provides an “annual chronology” of shrinking moose and caribou populations through; increased closures, antler restrictions, reduced bag limits, shortened seasons, special permits. The ADF&G Proclamation also identifies the primary problem of too many predators by the department’s adoption of more liberal bag limits on wolf and bear with corresponding lengthened hunting seasons while at the same time increasing restrictions on hunters pursuing caribou or moose. The problem of not enough game (caribou & moose) to go around is still with us over a decade later. If the Alaska Board of Game, ADF& G, along with conservationists/individuals continue aiming directly at the problem rather than leading their intended target, they will continue their track record of hitting behind their goal.

It is time for “forward thinking” and “forward action” to save the declining moose and caribou populations from extinction in GMU 17B. This problem is not just a Federal, State, Resident, or Non-Resident issue, it is everyone’s issue. We need a non-partisan predator control program that effectively works immediately at addressing issues concerning brown bear, wolf, and man in GMU 17B. Make the tough calls and let’s turn the tide before it’s too late for Alaska’s wildlife.

Sincerely,



Jim Roche  
707 N US Hwy 277  
Eldorado, TX 76936  
(325) 853-1555



## Proposal #70 - 5 AAC 92.540

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FEB 09 2011  
BOARDS

To Whom It May Concern:

This letter is in regards to Proposal #70 - 5 AAC 92.540

I am on the Paxson Advisory Committee, but was not at the last meeting where they proposed this idea.

I have been living on the Denali Hwy for the last 10 years and since 2003 we have lived right on the Maclaren River at mile 42 Denali Hwy.

I do not see the need for the action proposed in Prop #70.

We already have Clearwater Control Use Area, that controls a very large area along the Denali Hwy as well as the upper Maclaren River.

I do not see the need for making another non-motorized area practically on top of another one.

If people want to hunt in a non-motorized area, all they have to do is cross the Denali Hwy and use the North side.

I have not seen the "rapid expansion of ATV trails" in this area that Prop #70 refers to. Yes some of the trails have areas that have been widened to get around mud bogs, but none of the trails in this area have been lengthened.

In the last 10 years I have not seen one new trail put in. I would hardly say that there is a problem here.

This proposal, suggest that we need a "safe-haven areas for moose" I thought that's what the "Clearwater Control Use Area" was for?

I am opposed to Prop #70

Sincerely  
Alan Echols  
Maclaren River Lodge



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

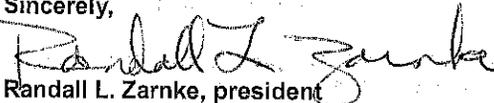
The ATA supports the concept of consistent bag limits between units and regions. We support the elimination of bag limits for coyotes. We do not support the concept of a year-round hunting season for coyotes. We do not have a biological concern with these proposals.

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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Alaska Department of Fish & Game  
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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**

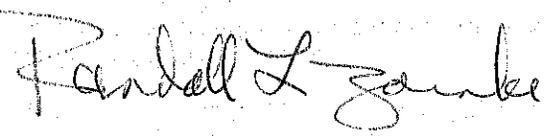
There is no reason for such sweeping closures. The ATA objects to the use of emotional and inflammatory language, i.e., "children" being caught in traps or closure to "all trapping." These concepts do not bring about meaningful discussion or scientific management practices.

**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

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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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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

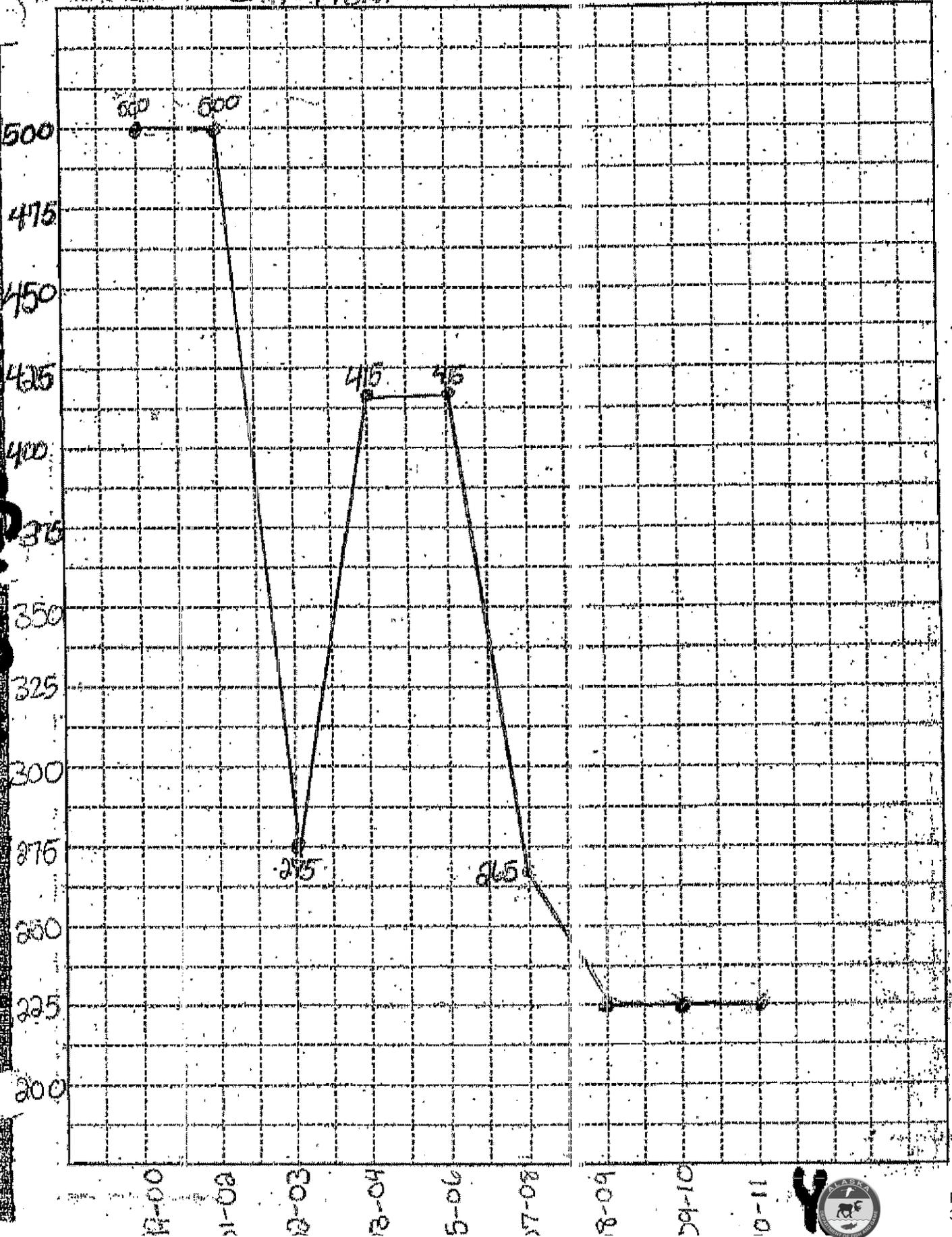


Student Math Journal

NAME Chris Kostecky

DATE \_\_\_\_\_

TITLE Game Management Unit 8 Afognak Island Elk Hunt

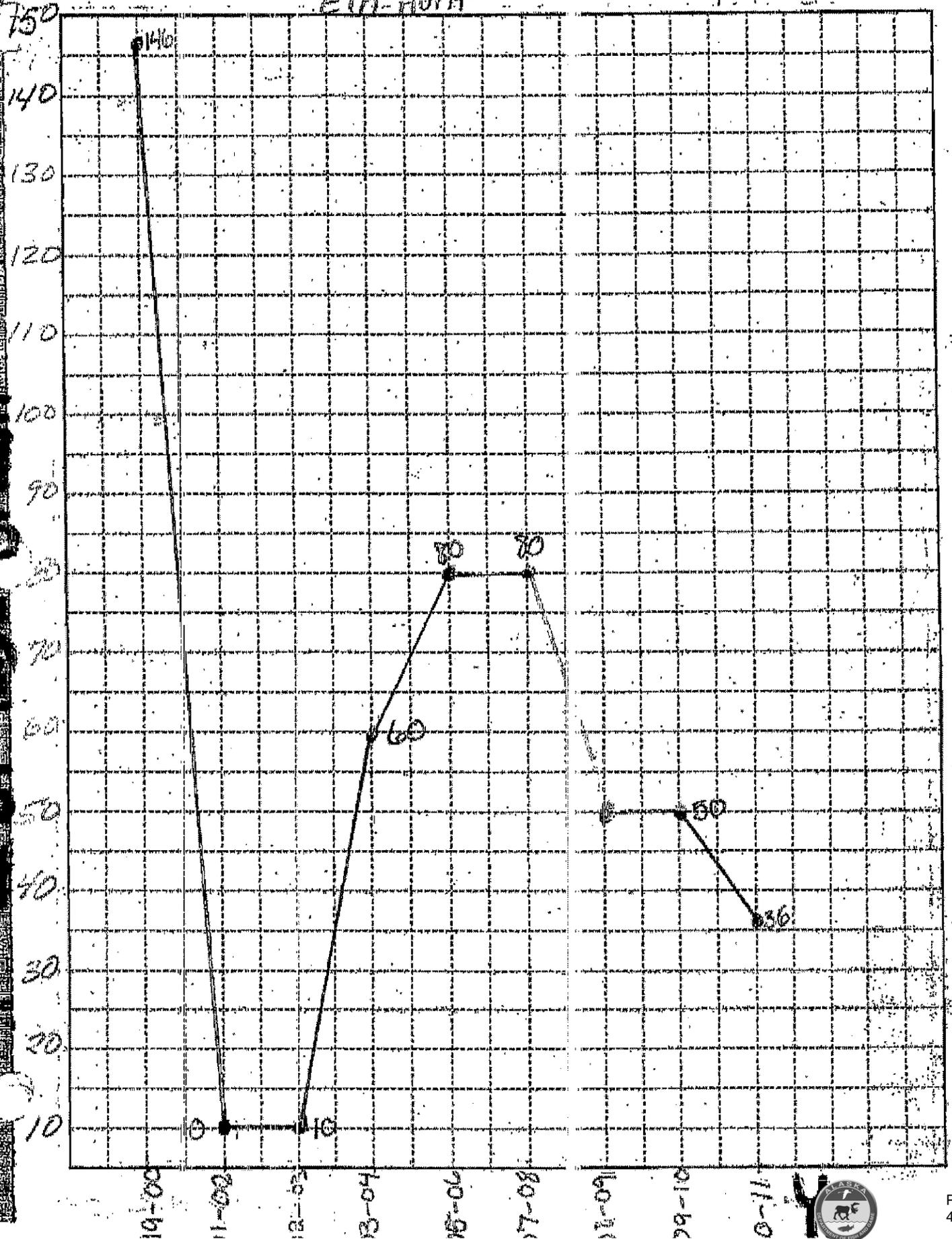


Student: Math Journal

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  
units. One Elk by permit archery  
only September 1-September 30<sup>th</sup>**

**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 30<sup>th</sup>**

**Chris Kostelecky  
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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.

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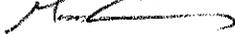
#### **OPPOSE PROPOSAL 194 - 5 AAC 85.065.**

**Hunting seasons and bag limits for small game.**

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

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



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.

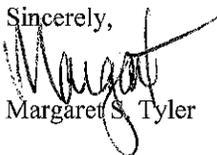
I am an avid user of our trail systems and often hike with my family and dog in Chugach State Park and the Chugach National Forest. I am aware that there are areas that trapping is permitted within the areas that we recreate and enjoy the scenery. We use the area year round – hiking, biking and camping 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,

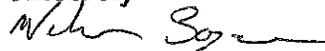
I would like to support the closing of Portage Valley to trapping. I have lived in Girdwood for the past 30+ years, as well as, working in Portage Valley for Portage Glacier Cruises as an Engineer/ Relief Captain. I have seen over the years how the valley is used for recreation and believe Trapping is 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.

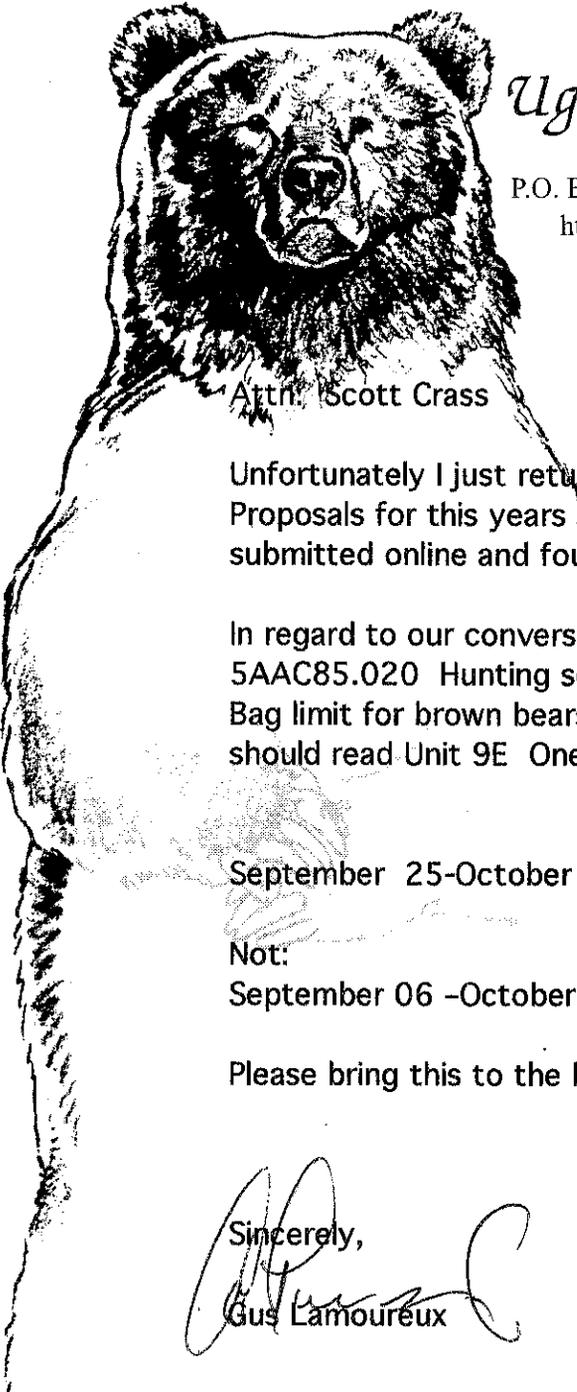
If the setback for trapping were observed and/or enforced, this would likely not be a big issue; however this is not the case. The Forest Service has invested a great deal of money to improve the recreational facilities in Portage and trapping in the valley seems to be at odds with improved recreation. 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





GUS LAMOUREUX'S

*Ugashik Lake and Kodiak Bear Camps*

Master Guide/Outfitter

P.O. Box 90444 Anchorage, Alaska 99509 ph 907-248-3230 fx 907-245-7338

<http://www.alaskafishandhunt.com> e-mail [info@alaskafishandhunt.com](mailto:info@alaskafishandhunt.com)

RECEIVED

JAN 16 2011

BOARDS

1-14-2011

Attn: Scott Crass

Unfortunately I just returned to town and received my copy of the board Proposals for this years spring meetings. I checked out the proposal I submitted online and found the following typo in a critical part of it.

In regard to our conversation I had with you today about the proposal #5-5AAC85.020 Hunting seasons and bag limits for brown bear; and 92.132 Bag limit for brown bears. The date for the proposed fall season change should read Unit 9E One bear every four regulatory years

September 25-October 15

Not:

September 06 -October 15

Please bring this to the boards attention.

Sincerely,

Gus Lamoureux



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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**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



RECEIVED

JAN 26 2010

BOARDS

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*



**Chignik Lagoon Native Corporation**  
**P.O. Box 169**  
**Chignik Lagoon, AK 99565**  
**(907) 840-2281, 2225**  
**(907) 840-2263**

RECEIVED  
JAN 25 2011  
BOARDS

January 21, 2011

Alaska Department of Fish & Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

**RE: Wolf and Bear Control**

Dear Ladies & Gentlemen:

Chignik Lagoon Native Corporation is the village corporation for the Native Village of Chignik Lagoon, Alaska. We have run into enormous problems with wolves and bears invading the Village of Chignik Lagoon. Predator control is absolutely necessary. We are requesting your immediate attention to this problem before one of our shareholders or residents of Chignik Lagoon is killed. We believe this is a matter of the utmost importance directly affecting the public safety of the entire Chignik area.

Very truly yours,

CHIGNIK LAGOON NATIVE CORPORATION

*Andrea Macaulay, President*  
Andrea Macaulay, President



RECEIVED  
JAN 24 2011  
BOARDS

## Proposal 192

I AM OPPOSED to this Proposal  
I TRAP Regularly along many state, Brough  
Trails and Roads used by mushers snowmobilers,  
all of these trails are Designated as multiple  
Use trails. This Law doesn't take into  
account where the trail is, many trails  
are in Remote Places where no one goes  
Especially people with small kids, I have  
trapped along many trails in the matsu  
Brough that mushers us and never  
had a Problem. There is no provision  
in this Law to take into account if  
the trap is above the ground Below  
the water or Ice. This Law would  
also Be a hinderance to anyone doing  
Damage work along Rds where Beaver  
are Plugging culverts. This Law is  
way to Restrictive. I also trap Fox coyote  
at a Bait site 75 Ft From a trail Less  
than a mile From a So dog dog lot  
and Don't have a Problem with catching there  
dogs.



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).

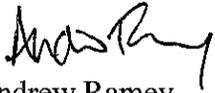
Finally, nowhere in Proposal 193 do the authors provide any support for the premise that limiting the opportunity for Alaskan hunters to harvest Goldeneye species would have any impact on populations in Alaska or across North America. Hunter induced mortality on waterfowl populations has long been considered 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



ALASKA DEPARTMENT OF FISH AND GAME  
BOARDS SUPPORT SECTION  
P.O. BOX 115526  
JUNEAU, AK 99811-5526

### **PROPOSAL #70 AAC 92.540**

Since I have reviewed the Proposal I had a chance to talk to a lot of the locals in the area, and they feel like I do that this proposal was generated by one individual who has a strong personal agenda in keeping his backyard private.

As there is already the "Clearwater Control" Use Area another non-motorized area so close to this area, I believe the people that want to hunt without an ATV can use that area.

The above proposal suggests that we need another "safe-haven area for moose"

### **I am opposed to Prop #70**

Sincerely,



Harry A Prichard  
6041 Mackay st.  
Anchorage Ak 99518



Lance Raymore  
8013 E 5<sup>th</sup> 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  
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.**

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.

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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.**

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

FEB 16 2011

A proposal to establish community subsistence harvest hunt areas and permit conditions will be before the Board of Game at their upcoming meeting that starts on the 21<sup>st</sup>. The proposal is formally designated "Proposal #50" and it is currently proposed only for Game Management Unit 13 (the Glennallen/Nilchena area), but it has legal and cultural implications that should be of concern to all Alaskans.

A 'community-based' harvest regulation would essentially give certain designated people the privilege of harvesting more than their individually permitted bag limit based on their affiliation with certain groups 'qualified' by the Department of Fish and Game.

The operative qualifications described in Proposal #50 are:

- "a custom of community-based harvest and sharing of the wildlife resources harvested in the hunt area by any group;" and
- "other characteristics of harvest practices in the hunt area, including characteristics of the customary and traditional pattern of use..."

There are a number of inherent problems with these nebulous terms that will further politicize fish and game management and divide Alaskans.

1. The department could define the terms to favor (or exclude) any specific group.
2. It could be very difficult to verify that the designated groups and individuals are in fact qualified to receive the privilege and are complying with the regulations.
3. Most people have not established a custom of community-based harvesting because existing fish and game regulations are not designed to accommodate that custom.
4. If a group or an individual has not already developed the custom, they would have no logical ability to qualify in the future without violating the regulations.

The proposal seems to violate Article 1 Section 1 of Alaska's State Constitution: "... that all persons are equal and entitled to equal rights, opportunities, and protection under the law;" It could very likely result in another costly lawsuit against the state.

There probably is some cultural value in the concept of 'community-based harvest', but recognizing a group right that is above individual rights in the management code leads down a destructive path.

Thank you for your consideration.



Glenn M. Prax

1015 Meadow Rue  
North Pole, AK 99705



FEB 17 2011

PROPOSAL #50- Comments by Wayne E. Heimer, 1098 Chena Pump, Fai. AK 99709

I oppose the creation of community harvest quotas of any sort because they impose Alaska Native cultural values on others, implicitly assuming game scarcity as a way of life. Here's why:

Community harvest quotas are justified as an extension of the Alaska Native tradition of sharing harvested animals. We all honor this tradition, particularly sharing with elders. Sharing harvested resources is not an exclusively Alaska Native tradition. Still, all Alaskans participate in this tradition through our subsistence priority. I'm not an Alaskan Native. However, I am old enough that my ability to hunt for myself is clearly not what it used to be. I benefit greatly from the non-Native tradition of sharing of harvested resources by my friends. In my culture this is a matter of individual choice, not community mores or tradition. My friends share their harvested fish and game with me because, for some reason, I'm important to them.

Maybe it's because I "earned" what they give me by teaching them what I knew about getting around the country I actively hunted when I was younger. Perhaps it is because they just like or feel sorry for me, or appreciate the contributions I've made to their ability to participate in harvesting. We all owe those who came before us in our hunting and management traditions. Whatever the case, I'm grateful.

The Native subsistence tradition involves focus on sharing harvested animals. We're told that sharing in aboriginal cultures was a survival adaptation. Game was so scarce that sharing was important to family, clan, and tribal survival. In those days, "hunting season" was always "open," and everybody shared in the "hunt" in one way or another. Game remained generally scarce.

As American conservation evolved, so did the less well-emphasized tradition of sharing *living animals*. Individuals set aside their personal interest in getting whatever they needed whenever they wanted it to assure an abundant later harvest. We agreed to delay harvests till production had been assured by observing "closed seasons." The idea was that rather than sharing an ever-scarce amount of "dead stuff," everyone shared the "living stuff" so there would be an abundance for harvest during "hunting season." After the abundant harvest, the game was yours, and you could share as you saw fit. Wildlife became abundant when managed this way.

Cultures work best when they share their best ideas. Alaska Native sharing of harvested animals is great. We provide for it via special subsistence seasons. Creating wildlife abundance through sharing the "live stuff" is also great. The concept of "community harvesting" with its implicit assumption of sharing scarce harvested game does not honor the American tradition of sharing live animals to create abundance. The American tradition should enhance the Native, not be restricted by it.

Wayne E. Heimer



ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section

**RECEIVED**  
FEB 15 2011

February 12, 2012

To the Board of Game regarding Proposal 232. Controlled Use Areas.

Please do not allow any motorized vehicle access in the Yanert Controlled Use Area in Unit 20. My name is Nan Eagleson; I have lived at Mile 228 Parks Highway, right across from the sole 17B easement to the Yanert, since 1992. I have been on the Middle Nenana Fish and Game Advisory Committee for the past 6 years (and will be for at least the next 3 years). I am an avid outdoor recreationist and spend literally hundreds of hour's dog mushing in the winter and hiking, harvesting berries and mushrooms and occasionally hunting in this area.

Allowing motorized vehicle use after September 30 will only bring the impacts of the Ferry and Rex Trails to this area. This is one of the few areas where people, who are motivated enough, can make the effort to hunt in quality wilderness surroundings. Many locals use this area year round hunting by dog team or skis for moose and ptarmigan, by foot in fall for caribou, pick berries, harvest mushrooms and know the lay of the land intimately and use it respectfully

If this Proposal is going to be made it should only be considered during a year when Interior Proposals are considered. This is out of cycle and made by an AC that does not represent the local area. No one in this area knew this was coming and it has huge implications.

I suspect many of the folks on the Fairbanks AC are not familiar with this area if they think they can come here and avoid problems with open water; the Yanert has incredible overflow problems in winter, as does Revine Creek, Teng Creek, Moose Creek and most of the drainages that flow into the Yanert. I am out there all the time by dog team and have seen multiple people stuck in overflow, encountering serious problems. I was on an Avalanche rescue in this area 2 winters ago and recognize lots of challenging terrain where people have or may create dangerous situations. This area is not known for heavy snowfall and the impact of snow machines or OHVs on this habitat, particularly ridges and high alpine areas (where the few moose are) will be highly detrimental. The added stress on sheep, caribou, and moose in the fall and winter by motorized vehicles will create a long term toll on these populations. None of this can be justified.

Past surveys done by F&G show this area has a very low density of moose. I do not believe the impact on habitat by motorized vehicles can justify the limited numbers of moose that may increase harvest quotas, artificially set by Intensive Game Management mandates.

There are huge problems with access in the Yanert already. I counted 17 pickup trucks with trailers parked in various ways along the highway just from the bottom of my driveway this fall. There is no safe place to park and to increase this use would be negligent and dangerous. I pick up bag loads of trash, catch loose horses and find people parked and camped on my property if I am not there to respectfully ask them to leave. I have had one of my premier lead dogs shot by a hunter while trying to help his buddy jump start his truck which he had let the battery run down



on. His buddy thought my dog was a wolf and shot it right before my eyes. This has been documented.

Thank you for considering the non motorized recreational values of this area for its residents. I hope there can remain a few undestroyed areas for hunters who seek solitude, maintain the ethic of fair chase, appreciate the integrity of intact habitat and enjoy wildlife for more than just its consumptive values.

Sincerely,

Nan Eagleson  
PO Box 114  
Denali Park, AK 99755



February 15, 2011

ADF&G

Boards Section

Fax number: 465 6094

To whom it may concern:

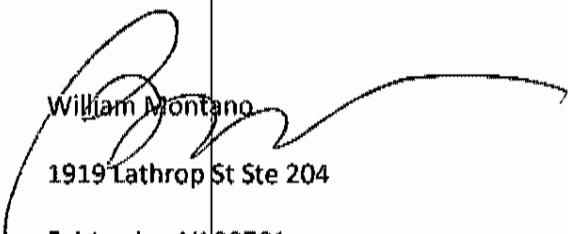
I strongly OPPOSE the CHP's and Proposal #50.

Regarding Proposal #50, I would not want you to jeopardize any reasonable opportunity for allocation of individual Alaskans. If this is adopted and the "new model" for allocation, it could become widespread.

The allotted number of Caribou and the persons who will be able to hunt this number are unreasonable. The number you put forth and the perimeter you are expected is unreasonable within the CHP. The vagueness of the wording you are using can in the future be interrupted for you means and not for the hunting population. This needs to be better defined to protect the hunt.

There needs to be definition and more discussion on these two issues before any decision should be made.

As it stands, I strongly OPPOSE the Board and Game's Proposal #50.

  
William Montano

1919 Lathrop St Ste 204

Fairbanks, AK 99701



February 15, 2011

ADF&G

Boards Section

Fax number: 465 6094

To whom it may concern:

I strongly OPPOSE the CHP's and Proposal #50.

The allotted number of Caribou and the persons who will be able to hunt this number are unreasonable. The number you put forth and the perimeter you are expected is unreasonable within the CHP. The vagueness of the wording you are using can in the future be interpreted for you means and not for the hunting population. This needs to be better defined to protect the hunt.

Regarding Proposal #50, I would not want you to jeopardize any reasonable opportunity for allocation of individual Alaskans. If this is adopted and is the "new model" for allocation, it could become widespread.

There needs to be definition and more discussion on these two issues before any decision should be made.

As it stands, I strongly OPPOSE the Board and Game's Proposal #50.

Roxanne Stickle

609 Apt A

Fairbanks, AK 99709



**Alaska Office**

333 West 4th Avenue, #302 | Anchorage, AK 99501 | tel 907.276.9453 | fax 907.276.9454  
[www.defenders.org](http://www.defenders.org)

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

To Whom It May Concern:

Defenders of Wildlife, The Alaska Center for the Environment and The Alaska Wildlife Alliance, and appreciate the opportunity to submit these written comments on proposals that will be considered at the March, 4<sup>th</sup> - 10<sup>th</sup>, 2011 meeting in Wasilla, 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 nearly 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 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

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

This proposal, if adopted, would allow a hunter to take one brown bear every two years in Unit 9.

The listed justification for this proposal is that there are an increasing number of bears in Unit 9 and bears are preying excessively on ungulates. Increasing the bag limit is projected to increase the bear harvest, decrease predation on moose and caribou 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 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 scientific field studies. We suggest that if the sponsor of this proposal suspects bear predation is limiting ungulate numbers in Unit 9, he should 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 5. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would lengthen the alternate year spring and fall brown bear hunting seasons in Unit 9E.

The listed justification for this proposal is that bears in Unit 9E are preying excessively on ungulates. Increasing the bag limit is projected to increase the bear harvest, decrease predation on moose and caribou 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 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 scientific field studies. We suggest that if the sponsor of this proposal suspects bear predation is limiting ungulate numbers in Unit 9, that 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.

**Proposal 6. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would increase the resident hunter bag limit for brown bears to one bear per regulatory year for various subunits in Unit 9.

The listed justification for this proposal is that bears in Unit 9 are preying excessively on ungulates. Increasing the bag limit is projected to increase the bear harvest, decrease predation on moose and caribou 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 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. We suggest that if the sponsor of this proposal suspects bear predation is limiting ungulate numbers in Unit 9, that they should request the BOG to direct the ADF&G to undertake scientific field studies to evaluate the nature and extent of bear predation in relation to other limiting factors.

**Proposal 7. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would increase the resident brown bear hunting bag limit to one bear per year in Unit 9E.

The listed justification for this proposal is that bears in Unit 9E are preying excessively on ungulates. Increasing the bag limit is projected to increase the bear harvest, decrease predation on moose and caribou 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 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. We suggest that if the sponsor of this proposal suspects bear predation is limiting ungulate numbers in Unit 9, that they should request the BOG to direct the ADF&G to undertake scientific field studies to evaluate the nature and extent of bear predation in relation to other limiting factors.

**Proposal 8. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would open the resident hunting season for caribou in Unit 9D—the Southern Alaska Peninsula Caribou Herd (SAPCH).

This proposal labels the wolf control program whose purpose was to increase the SAPCH for hunters “...one of the great management success stories...” We submit that it is far too soon to label it as a success and far too soon to re-open the hunting season. It will take several more years to determine the outcome of the wolf reduction and the response of the caribou herd. Caribou numbers are still small and it is possible that one severe winter could erase the gains made by reducing wolves. Hunting should not occur until caribou increase much beyond their current level. Only then can the National Research Council’s important recommendation be applied—to properly conduct predator reduction programs so that outcomes are clear. Alaska can’t afford the time and cost of another control program with unclear results produced by premature reinstatement of hunting.

**Proposal 21. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would establish an intensive management wolf and bear reduction program in Unit 9B.

The listed justification for this proposal is that wolves and bears in Unit 9B are preying excessively on ungulates. Reducing predator numbers is projected to decrease predation on moose and caribou 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 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 too, but there is no way of knowing absent field studies. We suggest that if the sponsor of this proposal suspects that predation is limiting ungulate numbers in Unit 9B, that they should request the BOG to direct the ADF&G to undertake scientific field studies to evaluate the nature and extent of predation in relation to other limiting factors.



**Proposal 22. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would establish an intensive management wolf and bear reduction program in Unit 9E.

The listed justification for this proposal is that wolves and bears in Unit 9E are preying excessively on ungulates. Reducing predator numbers is projected to decrease predation on moose and caribou 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 verifiable 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 that predation is limiting ungulate numbers in Unit 9E, that they should request the BOG to direct the ADF&G to undertake scientific field studies to evaluate the nature and extent of predation in relation to other limiting factors.

**Proposal 23. We offer the following comments on the Unimak Island wolf control program.**

This proposal, if adopted, would amend the wolf control implementation plan for the Unimak Island Caribou Herd.

Currently, comments are being solicited by the U.S. Fish and Wildlife Service (FWS) on an Environmental Assessment (EA) which addresses the state's proposal to reduce wolves on national wildlife refuge lands (Unimak Island) in order to increase caribou numbers for hunters. Defenders submitted extensive comments on this EA. At this time it is unknown whether the federal determination will or will not allow the State's proposed actions to proceed. If not, Proposal 23 will be moot.

**Proposal 25. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would increase the Unit 17 brown bear bag limit for resident and non-resident hunters to two bears per year.

The implied justification for this proposal is that bears in Unit 17 are preying excessively on ungulates. Increasing the bag limit is projected to increase the bear harvest, decrease predation on moose and caribou 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 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. We suggest that if the sponsor of this proposal suspects bear predation is limiting ungulate numbers in Unit 17, that they should request the BOG to direct the ADF&G to undertake scientific field studies to evaluate the nature and extent of bear predation in relation to other limiting factors.

**Proposal 26. We support this proposal and urge the BOG to adopt it.**

This proposal, if adopted, would shorten the brown bear hunting season and reduce the bag limit in Unit 17B, Lake Clark National Preserve.

When ANILCA passed in 1980 and established vast areas of new national preserves, it set the stage for conflicting management approaches. The National Park Service (NPS) mandates apply to the preserves but hunting is subject to state regulations. At times, state regulations are not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such is the case for bear hunting on Lake Clark National Preserve lands.

Proposal 26 details the problem for Lake Clark National Preserve. NPS mandates do not allow activities that reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands. This has been compromised by state regulations designed to reduce brown bears in order to increase moose. Bear hunting seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Recent increases in bear harvests conflict with the NPS objective of providing naturally occurring concentrations of bears. Harvests should be reduced by shortening seasons and reducing bag limits. We urge the BOG to take this step.

**Proposals 27 and 28. We oppose these proposals and urge the BOG to reject them.**

These proposals, if adopted, would establish a predator control implementation plan targeting brown bears in Unit 17B, or change the brown bear bag limit in Unit 17B for purposes of reducing bear numbers and increasing moose.

As with many proposals generated by local residents or Fish and Game Advisory Committees, these proposals contain only anecdotal claims that bear numbers have increased and there is heavy bear predation on moose resulting in fewer moose for hunters. This is used to justify a control program to reduce bears with the expectation that more moose will be available to hunters.



We suggest that any new bear control programs must be based on field studies that validly demonstrate bear predation is limiting moose population growth rather than other factors including heavy hunting, poor habitat, wolf predation or severe winters.

Anecdotal information is insufficient to trigger control programs as was clearly demonstrated in the McGrath area in 2000 and 2001. At McGrath, moose were estimated at 850 animals in 2000, down from several thousand two decades earlier. Locals termed it a crisis and demanded a wolf control program. A population of 3000-3500 moose was deemed necessary to sustain a harvest of 135-150 required for local subsistence needs. However, a moose census in 2001 revealed a moose population of about 3600, more than necessary to provide enough harvested animals per year for local residents. The 2000 moose population estimate (850) was based on poor data obtained during marginal census conditions that resulted in a drastic underestimate of true population size. This is an example of local reliance on anecdotal or poor information that may be used to justify unnecessary and costly predator control programs.

We should not repeat the mistakes made at McGrath when addressing concerns in Unit 17B. There is no substitute or shortcut for valid scientific field studies prior to creating a predator control program so that limiting factors are identified and ranked in order of importance. It has not been proven that predation is a universal limiting factor for moose populations across Alaska. Bear predation alone has seldom been documented as severely reducing moose numbers or holding moose populations at low densities.<sup>1</sup>

**Proposal 29. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would repeal the requirement that when brown bears are shot in defense of life and property (DLP) in Unit 17, the shooter must salvage the hide and skull and report the kill to the ADF&G.

This proposal labels the salvage and reporting requirements for DLP bears as "cumbersome." We regard the requirements as essential. Each year, in addition to bears that are shot that truly are DLP bears, brown bears are shot and DLP claims are made when bears are merely in the area but are no threat to humans. The DLP salvage and reporting requirements must be preserved in all Units to minimize the random shooting of bears. Those who shoot bears under a DLP claim must be prepared to skin the bear, save the skull and file a report. Repealing the requirement in one unit would lead to requests to repeal it in all other units and would ultimately

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<sup>1</sup> W.B. Ballard and V. Van Ballenberghe. 2007. Predator/Prey Relationships. Pp.247-273 in: A.W. Franzmann and C. C. Schwartz (eds.), Ecology and management of the North American moose, second edition. University Press of Colorado, Boulder, CO. 733pp.



result in the shooting of many more bears. The salvage and reporting requirements for DLP bears were adopted by the BOG years ago for sound reasons that are still valid. These requirements should remain as is in all Game Management Units.

**Proposal 38. We *oppose* this proposal and urge the BOG to reject it.**

This proposal, if adopted, would allow the use of radio communications for taking wolves in Unit 17.

We oppose this proposal because it would result in de facto predator control—reducing wolves in hopes of increasing moose for hunters by bypassing the adoption of a predator control program and preparing an implementation plan. Regulations allowing de facto predator control have been adopted by the BOG since passage of the Intensive Management Law in 1994. These have led to vast liberalization of wolf hunting and trapping bag limits and season lengths absent verifiable data showing that such regulation resulted in increased ungulates for hunters, or that wolves were limiting ungulates in the first place. Unfortunately wolves are taken when hides are unprime and worthless, and when young pups are dependent on adults and are likely to starve without them. Although these problems are not directly related to Proposal 38, it is aimed at de facto control and is therefore part of the same issue.

We also oppose this proposal because it would repeal the long-standing regulation prohibiting radio communications employed in taking big game animals including wolves. With all the legal methods of taking wolves using aircraft to spot them and snowmachines to transport hunters over vast areas, is it really necessary to instantly communicate the location of wolves to hunters on the ground? We think not, especially given that once the regulation is repealed in one unit it would likely spread to other units and to other species. We urge the BOG to preserve what few fair chase standards we have left in Alaska, especially for wolves and bears.

**Proposal 40. We *support* this proposal and urge the BOG to adopt it.**

This proposal, if adopted, would shorten the brown bear hunting season and reduce the bag limit in Unit 13, including lands adjacent to Denali National Park and Preserve and Wrangell St. Elias National Park and Preserve.

When ANILCA passed in 1980 and established vast areas of new national preserves it set the stage for conflicting management approaches. The NPS mandates apply to the preserves but hunting is subject to state regulations. At times, state regulations are not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such is the case for bear hunting on Wrangell St. Elias National Preserve and Denali National Preserve lands bordering Unit 13.



Proposal 40 details the problem for these national preserve lands. NPS mandates do not allow activities that reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands. This has been compromised by state regulations designed to reduce brown bears in order to increase moose. Bear hunting seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Recent increases in bear harvests conflict with the NPS objective of providing naturally occurring concentrations of bears. Harvests should be reduced by shortening seasons and reducing bag limits. We urge the BOG to take this step.

**Proposal 41. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would allow taking of brown bears at bait stations in Unit 13D.

The only justification for this proposal is that brown bears are frequenting bait stations intended for black bears in Unit 13D. This is the case in all areas where both species occur—brown bears are efficient at locating food sources. Hunters are familiar with this risk must be cautious and selective when approaching baits or deciding which animals to take.

We support the current prohibition on baiting brown bears and oppose repealing it in one or more units which would likely spread quickly to other units. We also suggest that if it were legal to incidentally take brown bears at black bear baiting sites, hunters could deliberately establish bait sites for brown bears under the guise of hunting black bears. There would be an unintended loophole in the regulations that could lead to taking many more brown bears in areas where increased harvests are not supported scientifically.

**Proposal 58. We offer the following comments on the Unit 13 intensive management moose population objectives.**

This proposal presents the Unit 13 moose population and harvest objectives for review by the BOG, as requested.

We are disappointed that ADF&G presented only the current intensive management objectives for moose in Unit 13 and did not suggest updating and revising the objectives - as they had acknowledged was necessary in the Unit 13 intensive management re-authorization plan. The BOG requested a review of the objectives and it is likely that the possibility of changing the objectives will be discussed at the BOG meeting. We suggest that specific moose population goals should have been part of this proposal so that the public would have opportunity to provide comments for deliberation by the BOG.



Nevertheless, we offer the following background and recommendations to assist the BOG in their review. When the intensive management objectives were adopted, they were based largely on historical trends in the Unit 13 moose population. These indicated a peak population in the early 1960s followed by a decline that bottomed in the mid-1970s. There was then another period of increase that ended in the late 1980s and early 1990s following a series of severe winters. Moose numbers then remained relatively stable though ADF&G claims that numbers again increased in recent years.

Moose numbers at the 1960s peak are unknown but were estimated to exceed 25,000. Numbers at the 1970s bottom of the decline are also unknown but were perhaps near 12,500. Similarly, the number present by 1990 is unknown but was estimated at about 20,000. We stress that these estimates are all crude and not based on aerial censuses.

When setting the intensive management objectives, the BOG relied heavily on these estimates. The result was a unit-wide population objective of 17,600 to 21,900, numbers that at the time were thought to be achievable based on the 1990 population estimate. We suggest that the 1990 population was the last in a series of high moose populations in Unit 13 that were proven to be unsustainable. Given that fact, we further suggest that the current population objective is too high and should be reduced. If moose numbers are allowed to reach the objective it will likely just set the stage for another decline, a pattern of fluctuations that Unit 13 moose have followed for several decades.

We note that ADF&G and the BOG have relied on similar processes in establishing intensive management objectives for many other ungulate populations based on unsustainable historic highs. A vast amount of literature on ungulate population dynamics over the past 3 decades demonstrates that management objectives should never be equated with maximum numbers.<sup>2</sup> Maximum productivity occurs at about 60% of maximum population, much below the point where food competition among ungulates becomes severe and extensive habitat damage occurs. Accordingly, if we use the Unit 13 moose population estimates of past peak numbers as indicators of maximum population size (20,000-25,000), managing the population for maximum harvest by hunters and predators would indicate a population objective of 12,000 to 15,000 animals. We submit this range of numbers for consideration by the BOG as it reviews the current intensive management objectives for Unit 13 moose.

**Proposal 73. We oppose this proposal and urge the BOG to reject it.**

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<sup>2</sup> V. Van Ballenberghe and W. B. Ballard. 2007. Population Dynamics. Pp. 223-245 in: A. W. Franzman and C.C. Schwartz (eds.), Ecology and management of the North American moose, second edition. University Press of Colorado, Boulder, CO. 733 pp.



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

This proposal advocates raising the black bear bag limit (and possibly the harvest) with no supporting data on changes in bear numbers or density. The only justification is to provide more hunting opportunity. However, prior to providing more hunting opportunity it must first be shown that this bear population can support potential increases in harvest. Bears in this area are affected by ever increasing loss of habitat and habitat encroachment by humans that exclude bears from areas where they previously thrived.

**Proposal 74. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would allow registered big game guides to have up to 10 bear bait stations in Unit 16.

We suggest that registered guides and non-resident hunters should not benefit from the special, overly liberal bear baiting regulations adopted as part of the Unit 16 predator control program. The state has argued that the extreme measures adopted by the BOG in recent years to accomplish intensive management such as aerial shooting of wolves are not actually hunting but rather are predator control actions not subject to fair chase standards. If so, then the extreme measures adopted in Unit 16 to reduce black bears should also be considered as control actions, not hunting, and therefore not eligible for commercial exploitation by guides.

**Proposal 76. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would provide a year-round open hunting season on brown bears in Unit 16.

We regard proposals like this one submitted by a Fish and Game Advisory Committee to be the end result of a process that began in 2003 when the BOG began adopting extreme regulations as part of intensive management bear reduction programs. Prior to 2003, brown bears were considered a valuable resource and managed largely as trophy animals. Sustained yield, long-term conservation and fair chase standards for taking bears were all part of the management philosophy applied to management programs when considering regulation changes.

When the BOG began to adopt extreme measures to reduce both black and brown bear numbers by legalizing actions such as sale of bear parts, same-day shooting, taking of bears with cubs and cubs, bear snaring and helicopter transport of bear hunters—things that never before had been legal—they instigated a shift in attitudes towards brown bears by the a certain segment of society. Brown bears have increasingly been regarded by some as predators and threats to human safety rather



than as trophy animals worthy of careful management. These attitudes have led to support of hunting regulations designed to get rid of bears rather than those designed to prudently manage them.

Despite the shift in attitude by some, many Alaskans still value brown bears as worthy of conservation and sound management. We encourage the BOG to demonstrate that brown bear conservation based on sound science is still the guiding principle behind the bear hunting regulations. This principle would dictate that year-round hunting of this valuable species is inappropriate. By setting this example, the BOG could inform advisory committees that a much broader view of brown bear conservation and management still applies in Alaska and that brown bears are much too valuable to be considered only as predators that we should severely reduce in numbers wherever they occur.

**Proposal 77. We oppose this proposal and urge the BOG to reject it.**

This proposal would provide a number of measures to reduce brown bears in Unit 16 in an attempt to increase moose for hunters.

As with many proposals generated by local residents or Fish and Game Advisory Committees, this proposal is based on anecdotal claims that bear numbers have increased and there is heavy bear predation on moose resulting in fewer moose for hunters. This is then used to request a control program to reduce bears with the expectation that more moose will be available to hunters.

We suggest that any new bear control programs must be based on field studies that validly demonstrate bear predation is limiting moose population growth rather than other factors including heavy hunting, poor habitat, wolf predation or severe winters. Anecdotal information is insufficient to trigger control programs.

We think that the specific measures suggested in this proposal to reduce bear numbers including taking brown bear sows with cubs, taking bears at bait stations, no closed season on bears, and snaring of bears are extreme measures. Some, like snaring of brown bears, have already been rejected by the BOG.

Specifically, we strongly oppose baiting of brown bears during summer, a measure that would be permitted under this proposal. There are many valid reasons for continuing the long-standing prohibition on baiting brown bears including the fact that baiting (feeding) bears habituates them to humans and may lead to more bears injuring or killing people, and to increased property damage.

There is no valid evidence indicating that allowing baiting will ultimately result in more moose for hunters. Indeed, hunters that normally stalk brown bears will likely substitute baiting for stalking with no increase in total hunting pressure or number of



hunters and no increase in bears harvested. There is no reason to believe that further liberalization in the form of legalized baiting will work.

Allowing baiting to occur during the summer months encourages hunters to waste hides and meat. Bears shed and replace their hair during summer and hides have no trophy value. Bear meat during summer is of low quality, especially for bears feeding on fish.

Bear baiting during summer may result in bears injuring humans when they encounter bait stations with bears nearby. Hikers, berry pickers, boaters and fisherman using the country during summer are apt to encounter bait stations, many of which are unused by hunters except on weekends. Bait stations without a hunter present with sows and cubs nearby are especially hazardous. Brown bears are known to aggressively defend food sources and may attack humans as a result.

We suggest that summer brown bear baiting is a dangerous practice and we urge the BOG to not allow it.

**Proposal 78. We support this proposal and urge the BOG to adopt it.**

This proposal, if adopted, would remove black and brown bears from the Unit 16 predator control program.

When ANILCA passed in 1980 and established vast areas of new national preserves it set the stage for conflicting management approaches. The NPS mandates apply to the preserves but hunting is subject to state regulations. At times, state regulations are not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such is the case for bear hunting on Lake Clark National Preserve lands. Such is the case for bear hunting on Lake Clark National Preserve and Denali National Preserve lands adjacent to Unit 16.

Proposal 78 details the problem for these national preserve lands. NPS mandates do not allow activities that reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands. This has been compromised by state regulations designed to reduce brown bears in order to increase moose. Bear hunting seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Recent increases in bear harvests conflict with the NPS objective of providing naturally occurring concentrations of bears. Harvests should be reduced by shortening seasons and reducing bag limits. We urge the BOG to take this step.

**Proposal 83. We oppose this proposal and urge the BOG to reject it.**



This proposal, if adopted, would allow taking bull moose in Unit 14A with spike or fork antlers during October 1-October 15.

The proposed dates of this season occur during the peak of the rut when most cows are bred. Holding a popular hunt during this time would likely disrupt breeding in accessible areas of the unit. There is a long-standing tradition in Alaska of setting fall moose hunting season dates before the peak of the rut, both to avoid disrupting breeding and to avoid bulls with poor quality meat.

The justification for the proposal refers to spike/fork antlered bulls as having "undesirable genetics." There are no studies demonstrating this, in fact white-tailed deer studies have demonstrated that spike antlers in yearling bucks are not a valid predictor of antler size as the bucks age. Furthermore, moose in Unit 14A are not managed for trophy antler size and hunting pressure prevents most bulls from reaching the age of maximum antler size. It is therefore irrelevant whether to select spike/fork yearlings for hunting in order to produce mature bulls that have trophy antlers.

**Proposal 90. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would close the antlerless moose hunt in Unit 14A and allow bait stations for hunting brown bears during spring.

There are many valid reasons for continuing the long-standing prohibition on baiting brown bears including the fact that baiting (feeding) bears habituates them to humans and may lead to more bears injuring or killing people and to increased property damage. This is even more likely to result in Unit 14A where every year there is increasing habitat loss and encroachment in areas where bears used to thrive.

There is no valid evidence indicating that allowing baiting will ultimately result in more moose for hunters. Indeed, hunters that normally stalk bears will likely substitute baiting for stalking with no increase in total hunting pressure or number of hunters and no increase in bears harvested. Despite vastly liberalized brown bear regulations over the past 20 years, bear numbers in adjacent Unit 13 have not declined, nor have more moose been taken by hunters as a result of the liberal bear hunting regulations. There is no reason to believe that further liberalization in the form of legalized baiting is appropriate or necessary in Unit 14A.

**Proposal 94. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would establish a non-resident moose hunt in Unit 16B.

It is far too early to re-instate non-resident moose hunting in Unit 16B. Only small gains in moose numbers are projected by ADF&G for this moose population since



the intensive management program was begun 5 years ago, and these gains are questionable given the lack of reliable moose census data. Any additional moose available to hunters should be allocated to residents. It will likely be several more years before non-resident hunting can be proposed given the current rate of increase displayed by moose in this unit.

**Proposal 103. We offer the following comments on reauthorization of the Unit 16 Predator Control Program.**

**Control area.** The terms “wolf (or bear) population reduction or population regulation” are used without definition. It would be helpful to know how population reduction and population regulation are defined by ADF&G and how they differ.

**Prey population information.** Moose numbers in Unit 16B are given very precisely as 3,421-4,392 for fall 2010 extrapolated from surveys conducted in 2004-2008. This gives the very misleading impression that the data are of much higher quality than they are and that population estimates are much more reliable than are possible given the existing data. This problem is shared by most of the predator control implementation plans—prey population estimates are based on trends or indicators rather than aerial census data. As a result, population estimates are provided that suggest that prey numbers are precisely known when, in fact, actual population size might be much different than indicated.

This and other elements of the implementation plan related to wolf and bear population estimates, as well as changes in other limiting factors including winter severity, habitat quality and hunting/trapping impacts, highlight the need to include a monitoring section in this and all other plans. In order to properly monitor the results of the management actions that are being applied, each plan should include a set of protocols describing the methods to monitor such things as predator and prey numbers. We urge the BOG to require periodic aerial moose censuses, not merely herd composition surveys, to measure significant changes in ungulate populations. Without such censuses it is impossible to determine whether or not predator control is “working.” Similarly, we urge the BOG to require periodic wolf and bear censuses to allow assessment of minimum predator population objectives and to ensure that predator numbers are not lower than stipulated. We regard the lack of monitoring protocols in the predator control implementation plans to be a serious deficiency that should be remedied.

The statement is made that: “... habitat does not appear to be limiting the moose population...and is not expected to limit the moose population at objective levels...” We suggest that available data do not allow such conclusions, nor is it even possible to speculate on what will limit moose numbers if they reach the intensive management population objective.



The Unit 16B moose population recruitment rate is estimated at 8-11% by doubling the observed yearling bull/100 cow ratio. Doubling the observed ratio cannot be used as a percentage to estimate recruitment. We find nothing in the moose population dynamics literature that validates this method of estimating recruitment.

**Predator population information.** Apparently using the same data, the 2006 estimate of 1,500 to 2,000 black bears in Unit 16 is extrapolated to 2,000 to 2,500 bears in 2007. No explanation is given. In fact, the data are insufficient to accurately estimate black bear numbers and the crude estimate given might deviate considerably from actual numbers.

The current estimated mean moose: wolf ratio is 77:1, well above the 30:1 ratio estimated in the literature to allow wolf predation to stabilize moose numbers. The program objective of reducing wolves to a mean number of 34 in Unit 16B should therefore be revised. There should be no need to reduce the current mean number of wolves, 60, to much lower levels given the present moose: wolf ratio and the reported increase in moose numbers in recent years.

The number of moose estimated to be killed by wolves in winter, 160-553, encompasses a huge range and indicates that the underlying data used to calculate these estimates are unreliable.

**Human use information.** The intensive management moose population objective for Unit 16B is given as 6,500-7,500. As with other Game Management Units (see our comments on the Unit 13 population objectives) this objective was largely based on historical high estimates that likely were very crudely constructed. They were clearly unsustainable and are now likely unattainable given changes in habitat quality over the past 50 years. We urge the BOG to re-examine the objective for Unit 16B and other units as indicated.

As with other implementation plans adopted by the BOG, there is a minimum wolf population objective provided, in this case 22 wolves in Unit 16B. But, as with other plans, there is no protocol provided to ensure that wolf numbers do not fall below this threshold. Without such protocols, providing the minimum number is meaningless. Properly conducted spring (late March or early April) aerial surveys of wolf numbers are necessary. Trapper reports or those of aerial shooters are often biased—they have a vested interest in inflating numbers so they can continue harvesting. We urge the BOG to insert wolf survey protocols into this and other implementation plans to ensure that a viable wolf population remains following control actions.

Although the original black bear population estimate increased in this revised plan (2,000-2,500 vs. 1,500-2,000), the minimum population objective (600) did not. It was based on a 60% reduction of pre-control bear numbers using 1,500 bears as the base. If



the BOG accepts the new estimates as correct despite their potential inaccuracy, we suggest also raising the minimum objective to 800 bears using the new base of 2,000 bears.

**Alternatives for predator control.** Alternatives to lethal predator control are labeled as ineffective, impractical or uneconomical. A lengthy explanation follows but conceals the fact that the Fortymile Caribou Herd program of sterilizing and transplanting wolves was hailed as a great success by ADF&G at the time. Since then, the BOG has simply been unwilling to seriously consider non-lethal methods preferring instead to adopt extreme lethal measures that are thought to be faster and simpler. We urge the BOG to seriously consider implementing non-lethal predator control methods in this and other units.

**Anticipated time frame.** This program update proposes increasing the program's duration to 6 years from the customary 5. We oppose this change. Even five years is a long time to conduct highly controversial control programs with little public oversight. We strongly urge the BOG to retain the customary 5 year program duration when renewing and updating this implementation plan.

**Proposal 105.** 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 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 thus bypassing the public process through which predator control programs are adopted. We urge the BOG to reject proposals like this in an attempt to demonstrate to the public that the few fair chase standards Alaska has left (including prohibition of same-day airborne hunting) are still important and should be preserved.

**Proposal 106.** 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 4.

We opposed the re-classification of black bears as furbearers. The re-classification was adopted to allow foot snaring of black bears in predator control areas. Now, proposals like this aim to allow "trapping" over vast areas through the use of guns,



bows and arrows, muzzle loaders, or spears in addition to foot snares, thus bypassing the public BOG process through which predator control programs are formally adopted. A bag limit of 10 bears is excessive and may result in local over-harvest of bears.

**Proposal 107. 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 black bear bait stations.

**Proposal 108. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would establish a regional black bear hunting bag limit in Region 4.

We endorse the current regulations that provide for bag limits unit by unit. Requiring unit by unit bag limits is the only way to ensure compliance with reporting requirements and to prudently manage big game populations so as to avoid over-harvesting. Adopting a regional bag limit is very unwise and would likely lead to abuse of the bag limit regulations. Enforcement of a region-wide bag limit in the field would be nearly impossible.

**Proposal 109. We support this proposal and urge the BOG to adopt it.**

This proposal, if adopted, would restore the brown bear hunting tag fee on lands in and near national preserve lands in Units 11, 13, and 16B.

When ANILCA passed in 1980 and established vast areas of new national preserves it set the stage for conflicting management approaches. NPS mandates apply to the preserves but hunting is subject to state regulations. At times, state regulations are not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such is the case for bear hunting on Wrangell St. Elias National Preserve and Denali National Preserve lands adjacent to Unit 16.

Proposal 109 details the problem for these national preserve lands. NPS mandates do not allow activities that reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands. This has been compromised by state regulations designed to reduce brown bears in order to increase moose. Bear hunting seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Recent increases in bear harvests conflict with the NPS objective of



providing naturally occurring concentrations of bears. Harvests should be reduced by shortening seasons and reducing bag limits. We urge the BOG to take this step.

**Proposal 110. We oppose this proposal and urge the BOG to reject it.**

This proposal would reauthorize the brown bear tag fee exemption in various units of Region 4.

Please note our comments on proposal 109. We oppose continuing the tag fee exemption on and near national preserve lands in Units 11, 13 and 16B.

**Proposal 119. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would create a new predator control program in the range of the Mulchatna Caribou Herd.

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 too, but there is no way of knowing absent scientific field studies. We suggest that if the sponsor of this proposal suspects predation is limiting the Mulchatna Caribou Herd, 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.

**Proposal 120. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would raise the intensive management population objective for the Mulchatna Caribou Herd to 100,000-150,000.

Arbitrarily raising the population objective of this herd will not accomplish the sponsor's apparent wish of increasing caribou numbers as outlined in this proposal. We regard the setting of intensive management population objectives to be important and worthy of careful evaluation. In the absence of compelling data establishing that the available habitat can support more animals and that the proposed new population objective is sustainable, we strongly oppose increasing the objective.

**Proposal 121. We oppose this proposal and urge the BOG to reject it.**

This proposal, if adopted, would allow aerial shooting of wolves in Units 9B and 17.

The listed justification for this proposal is that wolves in Units 9B and 17 are preying excessively on ungulates. Aerial shooting is projected to increase the wolf harvest,



decrease predation on moose and caribou 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 valid field data identifying limiting factors for ungulate populations that include other variables besides wolf 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. Wolf 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 wolf predation is limiting ungulate numbers in Units 9B and 17, he should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of wolf predation in relation to other limiting factors.

**Proposal 231. We support this proposal and urge the board to adopt it.**

This proposal, if adopted, would authorize an antlerless moose hunt in Unit 13.

One of the pitfalls of intensive management is that if it is successful, ungulates may increase to the point where density-dependent feedbacks reduce reproduction and survival and indicators of herd health such as body growth of young and fat reserves of adults decline. At high density, ungulates often overbrowse forage plants, at times enough to cause plant mortality. Eventually, a population decline occurs often as a result of severe winter conditions. There are several well-documented case histories in Alaska that followed this scenario in the past including Unit 13 where a high density of moose (and caribou) in the 1960s declined greatly by the mid-1970s.

Accordingly, managers must monitor moose numbers carefully to prevent the problems that accompany high moose densities. We note that managers often fail to grasp the concept that too many moose might result from intense predator control. A vast literature on ungulate population dynamics over the past 3 decades has demonstrated that management objectives should never be equated with maximum numbers. Maximum productivity occurs at about 60% of maximum numbers, much below the point where food competition among ungulates becomes severe and extensive habitat damage occurs. Accordingly, if we use the Unit 13 moose population estimates of past peak numbers as indicators of maximum population size (20,000-25,000 during peaks in the 1960s and late 1980s), managing the population for maximum harvest by hunters and predators would indicate a population objective of 12,000 to 15,000 animals at present. This is well below the intensive management objective currently in the regulations.

We submit that it would be a mistake to increase moose in Unit 13 to estimated numbers (20,000-25,000) that occurred during past peaks as these had a



demonstrated history of being unsustainable—population declines inevitably resulted from high moose density. The only way to effectively stabilize an increasing moose population (or to reduce it) is to harvest cows. Harvesting bulls only cannot stop population growth as cows comprise more than half of the total population.

We encourage the board to recognize that moose numbers in Unit 13 should not be allowed to increase to high density and that implementing cow hunts now is the prudent way to begin managing them to prevent this from occurring. We further suggest that the intensive management population objectives for Unit 13 should be lowered (see our comments on Proposal 58). Because Unit 13 is such an important hunting area for Alaskans and because it has a history of being carefully managed, it can serve as a model for other units if intensive management is successful there. But it will be a poor model if cow hunts are delayed and moose increase beyond sustainable limits.

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#### Board of Game Wolf Population Control and Management Policy #2011-XXX-BOG

We **oppose** the majority of changes made to the Board of Game's Wolf Population Control and Management Policy (wolf policy), but **support** developing alternative methods to aerial control.

The wolf policy has received some cosmetic modifications and extensive simplification from the version presented in the October 2010 BOG proposal handbook; the overall result is an even more inferior document. Softening the policy's title by eliminating the word [control], adding some conciliatory language relating to the importance of wolves to all Alaskans, and attempting to differentiate between management and control does not change the purpose of the policy – which is to provide guidance on how the BOG will suppress wolf populations. Passage of this stripped down policy will lead to a more arbitrary decision-making process.

As outlined in our comments on the October 2010 version of the wolf policy this continues the trend of a decreasing reliance on vital scientific information to justify Alaska's highly controversial wolf control programs (see Defenders' comments on Board of Game Wolf Population Control and Management Policy #82-31-GB included in the October BOG meeting handbook). The revised wolf policy omits all language referring to factors other than predation that may limit ungulate populations and fails to link the reduction of wolves with sought-after increases in ungulate populations for the benefit of human harvest.



Defenders continues to maintain that ADF&G has not collected sufficient data or conducted sufficient studies to determine conclusively that their predator control programs are responsible for increases in ungulate populations. Nor has the Alaska Department of Fish and Game (ADF&G) presented sufficient data to demonstrate that a statistically significant increase in prey populations has occurred. The revised wolf policy does not address these issues and fails to tackle significant weaknesses in Alaska's controversial predator control programs.

### **Background and Purpose**

The new version of the wolf policy includes the statement that "In some other areas, including national park lands, the Board also recognizes that non-consumptive uses of wolves may be considered a priority use. With proper management, non-consumptive and consumptive uses are in most cases compatible but the Board may occasionally have to restrict consumptive uses where conflicts among uses are frequent."

We welcome the recognition by the BOG that where conflicts arise between consumptive and non-consumptive users that consumptive uses may need to be restricted. However, we urge the BOG to further recognize that the state of Alaska's wolf control policy also often conflicts with the mission and policies of federal agencies who are mandated under federal law to manage their lands for natural diversity and natural conditions rather than the maximization of hunting opportunity. The BOG should amend the wolf policy to expressly exclude federal lands from regulations aimed specifically at decreasing natural predator populations in order to allow federal agency managers to meet their mandates.

### **Wolf/Human Use Conflicts**

As stated in our previous comments, the first overt change to the wolf policy occurs under the section on wolf and human use conflicts. This section states that conflict arises when human uses of prey animals cannot be reasonably satisfied; eliminated is the final portion of the sentence which stated [because of predation by wolves]. We agree that conflict between humans and wolves arises when humans perceive scarcity or when hunter satisfaction is reduced, and we feel it is significant that this language is omitted. In fact, this omission provides further evidence for the widespread conviction that the ADF&G's predator control programs are often driven more by human perception than biological need.

### **Wolf Management and Wolf Control**

In the wolf management and control section of the newly amended policy, the BOG attempts to differentiate between *management* and *control* (emphasis added).



In the newly added section the BOG defines wolf management as “managing seasons and bag limits to provide for general public hunting and trapping opportunities.” However, this section immediately follows with a statement that “management” helps aid in “mitigating conflicts between wolves and humans or improving ungulate harvest levels.” Thus, the BOG has succeeded in blurring the lines between what they define as control and what they define as management in the very same section that attempts to differentiate the two.

The section goes on to state that “hunters are satisfied with taking wolves during off-prime seasons and thus opportunity for harvest may be allowed.” While it may be true that hunters are “satisfied” with unprime furs, this satisfaction ultimately stems from some hunters’ desire to suppress wolf numbers in favor of increasing ungulates; indeed this is the main rationale identified in proposals to expand seasons into times when furs are unprime. Referring to this type of control as “management” is disingenuous as it fails to address the fact that seasons are often extended into the portion of the year when females are pregnant and denning. Further, unlike the “planned or systematic” way in which wolf “control” is supposedly implemented, when the BOG extends the season in the name of “management” it routinely does so by relying on anecdotal evidence that wolves are suppressing ungulate populations. Scientific studies backing these assumptions are seldom provided.

Overall, the BOG has failed in its attempt to distinguish a difference between control and management – other than demonstrating that “management” circumvents the public process of implementing wolf control and diminishes the need for scientific evidence to justify control efforts. The BOG cannot dispute that other furbearers are not “managed” in the manner outlined in this policy; allowing the harvest of a furbearing animal during reproductive seasons and when their pelts have little value is not sound wildlife management policy.

The approved and revised policies both indicate that wolf control means “the regulation of wolf numbers to achieve a temporarily lowered wolf population” and that “wolf populations are generally allowed to increase to or above pre-control levels once prey populations increase.” Unfortunately, as we stated in our comments on the October version of this policy, evidence from Alaska’s predator control programs clearly demonstrates the fallacy of this statement. Rather, history of Alaska’s wolf control programs shows that wolf populations will continue to be substantially suppressed over large areas of the state for extended periods of time.

One example of this is provided by the predator control plan for Game Management Unit (GMU) 13 which was readopted with little debate during the October, 2010 BOG meeting. In GMU 13, the wolf population has already been reduced to 1/3 its pre-control level for a period of 6 years. By re-adopting the plan, the BOG ensured that the population will continue to be suppressed to this level



for an additional 6 years. The wolf policy, therefore, continues to lead readers to believe that this is a temporary solution when in reality these programs may very well be perpetual.

In our prior comments on this policy we criticized the BOG for stating that "over thirty years of intensive wolf and moose management and research has provided a great deal of information on what biologists can expect from intensive management programs" (see Defenders' comments on Board of Game Wolf Population Control and Management Policy #82-31-GB included in the October BOG meeting handbook).

The extensive revision of this section expounds upon the level of information now known about the success of predator control. While we appreciate the BOG's effort to clarify the development of knowledge regarding the effects of predator control from that presented in the October 2010 draft, the new inclusion is misleading, leave the false impression that much has been learned over the last 13 years that was not known when the National Research Council (NRC) conducted their review. In fact, the ADF&G has not significantly improved the design of their predator management programs since the NRC published its report. Thus, we continue to question the claim that a good deal has been learned. Specific recommendations that would allow the BOG and ADF&G to make such claims have been largely ignored including:

1. Management actions should be planned as experiments so it is possible to assess their outcome. Control actions should be designed to include clearly specified monitoring protocols of sufficient duration to determine whether or not predictions are borne out and why.
2. Managers should avoid actions with un-interpretable outcomes or low probability of achieving stated goals.
3. The status of predator and prey populations should be evaluated before predator reduction efforts occur.
4. Better data on habitat quality should be collected and carrying capacity of the prey's habitat should be evaluated.
5. Changes in the population growth rate of prey and in hunter satisfaction should be monitored.
6. The scope of studies of predators and prey should be broadened and better data on bear ecology should be collected.
7. Development of long-term data sets should continue and better data on long-term consequences of control should be collected.
8. Decision makers should be more conservative in setting hunting regulations and designing control efforts (NRC 2007:10-13).

#### **Decision to Undertake Wolf Control**



The previously approved wolf policy had admittedly weak language regarding the importance of monitoring, stating that [surveys *should* be made at least once a year in control areas to provide estimates of population sizes, productivity, mortality factors, and distribution of the respective populations] (emphasis added).” However, the revised wolf policy eliminates this language altogether and states that surveys should be conducted as frequently as necessary to ensure that adequate data are available to make management decisions and to ensure that wolf numbers remain sufficient to maintain long-term sustained yield harvests.

The omission of what types of data should be collected as well as the provision of increased latitude concerning the requirements for when surveys should be conducted is of great concern to those who have long advocated that increased rigor be applied to Alaska’s predator control programs. Further, as we stated in our previous comments, the addition of sustained yield language does not alter the reality that wolf populations in wolf control areas have already been drastically reduced. Sustained yield can occur at a number of different population levels and, as long as a population does not continue to decline after objectives are met, one could claim that the provision for sustained yield is being met.

ADF&G often asserts that wolves are resilient to over-harvest. However, any population of any species that has undergone dramatic reductions is more susceptible to stochastic demographic, genetic, or environmental events and is thus more vulnerable over the long term. While it may satisfy a judge with no biological education or experience, adding a clause alluding to sustained yield does not ensure that the goals of long-term viability for wolf populations will be met. Further, managing wolves solely for “sustained yield” ignores the keystone role wolves play in Alaska’s ecosystem including natural regulation of ungulate populations and maintenance of herd health.

Another change to the wolf policy from that of the October version was the complete elimination of the bulleted list outlining when the BOG would decide to undertake wolf control. The paragraph provided in its place generalizes and simplifies the conditions under which wolf control will be considered. Again, simplification of the policy will lead to a less rigorous decision-making process; we urge the board to strengthen rather than weaken the policy standards for implementing wolf control.

### **Methods the Board will Consider When Implementing Wolf Control Programs**

1. Expanding public hunting and trapping into seasons when wolf hides are not prime.



As stated previously, the BOG directly contradicted itself by claiming that expanded hunting seasons are considered "management" and not "control." Listing the expansion of seasons under wolf control further clarifies this contradiction.

2. Use of baiting for hunting wolves

We generally oppose this method of hunting wolves as it does not adhere to the principles of fair chase, encourages the habituation of wolves to human foods and poses a public safety risk. We especially oppose allowing this method of trapping under general trapping regulations.

3. Allowing land and shoot by the public.

4. Allowing aerial shooting by the public.

Aerial shooting of wolves was referred to in the October version of the policy as: [The Commissioner of Fish and Game may delegate authority to department personnel or agents of the state to shoot wolves from airplanes or helicopters as part of wolf population control programs. Taking wolves under delegation of authority from the Commissioner is not considered hunting and permits will not be issued to nonresidents.]

We are concerned that the new policy eliminates the language regarding the Commissioner being responsible for delegating this authority. Are we to assume that the BOG will now be responsible for permitting citizens? If so, we oppose this change, if not, who will be responsible? We are also concerned that reference to non-residents being ineligible to participate in these programs is eliminated. Under no circumstances should non-residents be allowed to participate in control programs and we find that there is no need to eliminate reference to non-residents in this policy. We do not support the expansion of means to take wolves through aerial gunning programs - especially by private citizens. If aerial control is biologically justified, it should only be conducted by expertly trained personnel and not by privately permitted citizens.

5. Encouraging the Department to hire or contract with wolf trappers and other agents who may use one or more of the methods listed here.

While Defenders opposes management of game species to maximize production, methods alternative to aerial gunning should be explored and we support this aspect of the revised wolf policy. However, any liberalization of trapping or hunting of wolves must be both biologically defensible and socially acceptable. As Defenders has advocated in previous comments and proposals, programs must demonstrate that ungulate populations are suppressed, that a biological emergency



exists and that predators are the primary cause for declines. Further, programs must demonstrate a reasonable expectation that reduction in predators will result in an increase in ungulates; include standardized and peer reviewed protocols for determining wolf populations in order to insure the continued viability of the population; include habitat and disease assessments in order to determine other potential causes for declines; and, ensure herds remain below carrying capacity in order to prevent ecological degradation. In addition, all trapping programs must be conducted during seasons when females are not denning and where pelts are prime in order to avoid waste of a valuable wildlife resource.

In addition to exploring alternative lethal methods for taking wolves, we encourage the BOG to consider alternative methods of reducing predation including sterilization of wolves and protection of calving females. Such methods have been proven effective in other areas. Again, methods of reducing predation should only be used when predation is the primary limiting factor and where habitat evaluations have demonstrated that the herd is well below carrying capacity. Such methods should not be used to maintain herds at or near carrying capacity.

#### Terminating Wolf Control

We appreciate the addition of language regarding the termination of wolf control. However, the inclusion is far too general to provide real guidance on the duration of wolf control programs. This portion of the policy should be augmented in order to provide guidance on when programs will be terminated.

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### **Board of Game Bear Conservation, Harvest, and Management Policy #2011-XXX-BOG**

We continue to oppose the adoption of the revised Bear Conservation, Harvest, and Management Policy (bear policy). Despite revisions from that were presented in the October proposal book, the proposed bear policy remains primarily focused on bears as predatory species in need of reduction through a wide variety of means. It fails to prioritize conservation and ethical treatment of bears in Alaska. The proposed bear policy broadly expands the power of the Board of Game (BOG) to develop regulations on management of both black and brown bears in absence of biological justification and through the use of highly controversial harvest practices.

Specifically we oppose the following changes outlined in the bear policy:

1. the extensive changes to the bear policy's *Guiding Principles* which virtually eliminate all language referring to the conservation of bears in Alaska;



2. the elimination of language regarding the importance of monitoring bear harvest and population size;
3. the elimination of language regarding effectiveness of bear control in reducing predation on ungulates including the *Board Consideration* section of the policy which outlined under what scenarios bear control could be considered;
4. the elimination of the restriction that liberalized means of harvest be instituted solely for the purposes of bear control as well as the expansion of controversial methods and means of bear harvest.

## Background

### *Wildlife Viewing*

We appreciate the BOG amending the bear policy from that presented in the October proposal handbook to reflect the importance of bear viewing in the state. However, the revised bear policy continues to exclude language regarding maximization of public benefits and the need to pursue management programs designed to provide wildlife viewing opportunities.

### *Brown and grizzly bears*

The new bear policy continues to provide an interesting discussion of the resilience of brown bears to the effects of over-harvest and predator control campaigns. Even more interesting is the utilization of Kenai Peninsula brown bears as an example of how past conservation concerns dissipated with new information. The language utilized in this section implies that the "stakeholder process" resulted in the determination that the bear population on the Kenai remained stable despite initial concern. However, the attempt to conflate the stakeholder process with this determination is a clear mis-representation as the process did not make this determination, nor was it meant to. Rather, the stakeholder group developed a report titled "*A Conservation Assessment of the Kenai Peninsula Brown Bear*" which summarizes the current knowledge of population trends and conservation threats.

The main conclusion presented by the report was that significant knowledge gaps exist which are critical for effective management of the population. In fact, U.S. Fish and Wildlife Service (FWS) continues to be concerned over the Kenai's brown bear population because the harvest has been liberalized substantially since 2007 and large numbers of animals continue to be taken annually in defense of life and property, including a high of 42 animals in 2008 alone. Due to this ongoing concern, the FWS recently initiated a study to determine the population size of Kenai brown bears – a study to which ADF&G was opposed. If so few examples exist to demonstrate the resiliency of brown bears to high levels of harvest then further research is clearly needed before implementing management measures that could affect brown bear conservation.



## Guiding Principles

Unlike the guiding principles established in the 2006 bear policy the new *Guiding Principles* are aimed almost exclusively at the management of bears as predators and implementing strategies to reduce their populations rather than the conserve the species in Alaska.

We oppose changes to the *Guiding Principles* which eliminate:

1. language referring to the need to work with enforcement agencies to identify enforcement priorities and to assist with and encourage adequate enforcement activities;
2. language regarding protecting genetic diversity of bears;
3. language regarding the need to consider the short-term and long-term effects of habitat loss and fragmentation on bear populations.

If the BOG intends to allow extreme methods to promote the increased take of bears including baiting, unlimited harvesting, selling of bear parts, taking of sows and cubs, and aerial control as is outlined in this policy it must ensure that harvest is strictly controlled, effectively enforced and monitored. Eliminating the need to work with enforcement agencies to ensure adequate enforcement is therefore unacceptable. The bear policy language should be amended in order to institutionalize partnerships between enforcement and management agencies.

Overall, the elimination of conservation related language from the *Guiding Principles* calls into question the BOG's intentions concerning the long-term viability of bears in Alaska and reinforces the view that the BOG has little concern for the overall health of bear populations. It is not enough to state that bear populations will be "managed on a sustained yield basis." Rather, the bear policy must include language on how this will be achieved. We recommend that the *Guiding Principles* section be amended to include the formerly eliminated language on genetic diversity and effects of habitat loss and fragmentation.

While we continue to oppose the majority of changes made to the *Guiding Principles* section, we support the BOG in promoting regulations that encourage the human use of bear meat as food as outlined in *Guiding Principle* number 5 of this latest revision to the bear policy. By acknowledging and promoting the value of bears as an important food source, the BOG can help increase respect for and understanding of the importance of maintaining healthy bear populations. The utilization of bears as food sources can also decrease pressure on ungulate populations, allowing people to concentrate harvest efforts on species that are



abundant rather than focus on predation by bears on "preferred" game species.

### **Conservation and Management Policy**

In general the conservation and management portion of the bear policy continues to focus excessively on predation by bears as a negative aspect of their biology rather than as an integral component of the ecosystem. We urge the BOG to increase the focus on conservation of bears and to promote acceptance of natural bear predation among the public.

#### *Monitoring Harvest and Population Size*

The revised bear policy states that in some areas monitoring bear numbers and harvests is of lower priority than regions where trophy quality is important. While we agree that it is important to alleviate the difficulty of sealing bears for subsistence harvesters in remote areas, this does not mean that adequate data should not be collected for these harvested populations. Indeed, failure to monitor bear populations in remote regions may result in over-exploitation. This is especially true of brown bear populations which are more vulnerable to overharvest. Though the bear policy states that community harvest surveys may be used to gain knowledge about the level of harvest over time, these surveys are sorely lacking in most regions of the state – especially in areas where monitoring is of low priority. Further, even where sealing is required, harvest of black bears especially remains sorely underreported. The revised bear policy must therefore maintain the need to adequately monitor all harvested wildlife populations to ensure population viability.

#### *Managing Predation by Bears*

The revised bear policy states that the "Board and the Department may also need to reduce bear predation on ungulates to provide for continued sustained yield management or conservation of ungulates." Since the BOG has recognized the need to promote the use of bears as a food species, we urge the BOG to consider that managing bears as a food source can reduce the harvest pressure on certain ungulate species. By focusing harvest on bears where they are abundant rather than moose, which are supposedly depleted, the BOG may be able to decrease the need to reduce bear predation strictly to protect ungulate species.

#### *Expansion of Controversial Methods*

We oppose methods of take that would allow:

1. trapping using foot-snares, for black bears under bear management programs or predator control programs;
2. incidental take of grizzly bears during black bear trapping programs;



3. taking of sows accompanied by cubs and the cubs;
4. Aerial shooting of bears by department staff in moose and caribou calving areas.

In the bear policy approved in 2006, the BOG's stated intent was that the predation management section of the bear policy only be directed at specific target areas and was not intended for implementation under general hunting regulations. However, the revised bear policy eliminates the stipulation that bear snaring is not meant for general hunting purposes, expands the use of bear snaring to include general bear management and eliminates reference to limit snaring to populations targeted for reduction. Policies such as the revised bear management policy - which conflate predator control with predator management - confuse the public's understanding of wildlife management in general and decrease the public's approval of all wildlife management practices.

The latest version of the revised bear policy also includes aerial shooting of bears as an additional method that may be considered for managing predation by bears. We *adamantly oppose* this method of controlling bear populations. Defenders has long opposed the state of Alaska's aerial wolf control programs for its lack of scientific justification, the focus on maximizing ungulate populations without regard to the ecosystem effects, the inhumane and controversial nature of shooting wildlife from airplanes and the difficulty of enforcing violations of the Airborne Hunting Act. For these same reasons, we oppose the use of airborne shooting for controlling bear populations in Alaska and urge the BOG to eliminate consideration of this new method from the policy.

We also continue to oppose:

1. Baiting of black bears
2. Baiting of grizzly bears
3. Same day airborne taking of bears

As we have stated in numerous comments to the BOG, bear baiting is a highly contentious issue in Alaska and does not meet the principles of fair chase. Allowing the same-day airborne taking of bears invites abuse of the Airborne Hunting Act. Defenders of Wildlife does not oppose wildlife harvest methods that are biologically justified and adhere to principles of sound wildlife management and fair chase. However, we will continue to oppose practices that do not adhere to these principles.

*Efficacy of Bear Control to Increase Ungulates*

We oppose changes to the new bear policy which eliminates the need for:



- a. bear predation to be determined as an important factor in the decline of a prey population or preventing recovery of a low density prey population;
- b. bear predation being shown to be an important factor preventing attainment of approved prey population of human-use objectives;
- c. efforts to control bear predation to be reasonably expected to achieve improvement in sustainable human use of ungulates.

The revised bear policy calls for the wide application of liberalized harvest methods such as snaring of black bears to reduce black bear populations and increase ungulates for human harvest. However, an increase in black bear harvest through snaring will not necessarily result in a substantial reduction of bear populations, nor is there any guarantee that moose population or harvest will increase as a result of these controversial programs. Field studies demonstrating that black bear predation is strongly limiting ungulate populations are lacking, as is data demonstrating that reduction in predation by black bears leads to an increase in moose numbers.

Overall, this revised bear policy does nothing to increase the scientific credibility of Alaska's programs or its bear management policies. In the 2006 version of the bear policy, the *Research Strategies* section stated that the department may conduct research to quantify the contributions of each bear species to the causes of declines in ungulate populations and that monitoring activities designed to determine the effects of high levels of bear harvest on recovery of depressed ungulate populations would help focus management efforts. However, any reference to the efficacy of management programs is conspicuously absent from the new bear policy. In order to increase the credibility of ADF&G's management policies, effectiveness must be thoroughly analyzed through field studies. Language regarding the need for this type of study must be reintroduced into the revised bear policy. The bear policy must also be amended to include the list of considerations the BOG must make prior to instituting any predator control plans.

## CONCLUSION

The proposed revised bear policy broadly expands the power of the Board of Game (BOG) to develop regulations on management of both black and brown bears in absence of biological justification and expands the use of highly controversial harvest practices. The types of liberalized harvest methods this bear policy promotes should be developed only under a formal predator control planning process initiated by the Alaska Department of Fish and Game (ADF&G) and subject to public review and comment. The Alaskan public and Alaska's wildlife deserve a bear policy that is based on sound conservation and wildlife management principles.



\*Note - as in the proposal handbook, underlined language in this section indicate additions that have been made by those who developed the revised wolf policy, while bracketed language indicates [deletions].

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



**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**



17 February 2011

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

Hello Board of Game,

I'm responding to Proposal 232, which will allow motorized access into Unit 20 for part of the hunting season.

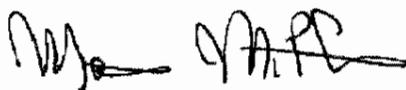
I do not want to see any motorized vehicle access to the Yanert Controlled Use Area in Unit 20.

I live at Mile 229 Parks Highway and recreate regularly in the Yanert Valley and environs. My recreation is solely muscle-powered. I've chosen over and over again in my life to accept the restrictions that non-motorized recreation, particularly in Alaska, places on the where I can get to, the distances I can travel, the amount of time I must devote to access, etc. The benefits are myriad from the peace and quiet of not hearing internal combustion engines to not having the bigger, wider trails (often muddier and, in winter, often broken) that are suitable for motorized vehicles.

Having a non-motorized hunting area close to my home is a compelling reason for me to live where I do and to continue working in Alaska.

On a less personal level, I don't understand the logic of opening up the Yanert area for motorized access for some part of hunting season. It seems to me, it would just cause another area of the state to have the same problems, that are trying to be solved by opening the area – crowding, trash, and environmental damage. It also seems to me that one of the most "Alaskan" of hunting options is a non-motorized hunt. The guides collect large fees for outsiders for that special experience of non-motorized hunting in Alaska. There are very few places left in the world where that special experience is available. The money outsiders provide to our community and Alaska in general is important. And lastly, there are very few moose living in the Yanert Valley according to wildlife surveys. My understanding is that the BOG is hoping to increase the moose harvest, an unlikely result since so few moose inhabit the area.

Thank you for listening,



Martha McPheeters  
PO Box 67  
Denali Park, AK 99755



# FAX

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TO:	Attn: Board of Game Comments	FROM:	Jeralyn Hath
COMPANY:	Alaska Department of Fish & Game	COMPANY:	Denali Pk, Alaska
FAX:	9074656094	FAX:	
SUBJECT:	Proposal 232	DATE:	Thursday, February 17, 2011

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Jeralyn Hath

February 17, 2011

PO Box 137

Denali Park, AK 99755

To the Board of Game regarding Proposal 232. Controlled Use Areas.

Please do not allow any motorized vehicle access in the Yanert Controlled Use Area in Unit 20. This is one of the few areas where only non-motorized hunting is allowed. It makes this area premier for hunting with horses and everyone here locally values this attribute.

There are plenty of areas in the State for motorized hunting. Please protect our premier hunting area in the Yanert. Keep it non motorized hunting only.

Thank you,

Jeralyn Hath



Ak Board Of Game Proposals

Proposal #70

I oppose this proposal. The entire north side of the Denali Hyway From the Big Su to Near Patson is already Nonmotorize for hunting. The east side of the Big Su at the middle fork is closed to motorize hunting .The entire McClaren River North of the Hyway is closed to motorized hunting. The east side of the McClaren River South of the hyway for 20 miles is closed for motorized as well as well east to Paxton except for a couple trails. This is clearly a major discrimination to the hunting groups that may want to use motorized access to the other areas. The Big Su is a major artery for transportation and should not be closed to motorized access on its banks. I believe the nonmotorized areas should provide more than enough area for the nonmotorized hunters. As to safe haven for the moose they have no problem hiding from the hunters as there are lots of brush to hide in. As for user conflicts there should be none as nonmotorized areas should not have ATVs in them. Most areas ive seen with Atvs on boats are only used to retrieve game not to hunt from. It already looks like the resource has inproved from my view of hunting the area. I have hunted these areas for years and have not seen any major conflicts between users . Michael Fulton



**Testimony Before the  
Alaska Board of Game**

**By**

Frank Woods  
Subsistence Coordinator  
Natural Resources Subsistence Division

Bristol Bay Native Association  
PO Box 310  
Dillingham, Alaska 99576

Dear: Mr. Chairman and members of the Alaska Board of Game;

My name is Frank G Woods III I am a 45 year old resident of Dillingham Alaska. My position is the Subsistence Coordinator for Natural Resources at the Bristol Bay Native Association (BBNA). BBNA is a consortium of 31 village s and is about the size of Ohio and we have two game units, Unit 9 and Unit 17. Unit 9 has 5 subunits (9a, 9b, 9c, 9d, 9e) and Unit 17 has 3(17a, 17b, 17c). We border game units 18, 19 and 16.

One of my first duties as the Subsistence Coordinator was to help assist in the Moose & Caribou Action Plan. This plan was to coordinate efforts with in the Bristol Bay Region with the latest scientific data to help rebuild the Moose and Caribou with in the Region. Under the Moose and Caribou Enhancement Project BBNA has held 4 meetings 2 in game unit 17 and 2 in game unit 9.

I will summarize the meetings that were held in Game Unit 17. They were informational only and no decisions were made. Out of these meetings you have a host of proposals before you this week.

The number one issue for Unit 17 has been the Mulchatna Caribou Herd. This herd exploded then has declined, spread out, divided and out-migrated its range. I believe it is two separate herds, east and west Mulchatna herds. Alaska Departments of Fish and Game's radio collaring project has shown that the caribou have out-migrated its original range and *Proposal 120* would increase the existing threshold to a reasonable number so managers can react to the decline and or increases in a timely manor. I would adopt *proposal 120* and act on it because of the reasons listed above.

The population of the Mulchatna Herd has declined way below the threshold for human consumptive use. 83 reported harvest in Unit 17 for 2009 at that 83 of the caribou reported is .017% of a caribou for each of the 4600 residents of Game Unit 17 these are embarrassing harvest numbers. *Proposal 30* asks for an extension of the existing season back to the original April 15<sup>th</sup> closure date 17c sub-unit west of the Woodriver excluded for caribou in Game unit 17c. If that can't be done then please give the biologist Emergency Order Authority to open the season to allow for meeting some of the harvest objectives.

Bears in game unit 17 are really becoming a safety concern for local resident and you have before you a host of proposals to deal with bears. Eliminating the defense of life and



property salvage requirements would be the first step so adopting *proposal 29* would be a start.

Wolves in unit 17 are a huge concern just as much a safety concern but a management concern as well. *Proposal 121* addresses this problem I would extend that plan to include bears also. I attached resolution to support predator control on Corporation land by the biggest private land owner the village Choggiung Limited.

AS for Game Unit 9 BBNA has hosted two meetings. I have attended and participated in what is now a working group that had very little resident input. After three meetings here are my conclusions. Game Unit 9 has a serious moose population decline. Cow to calf ratios maybe expectable but the lower number of moose isn't. There needs to be direct regulation to change this Game to BE Managed for ALL GAME SPECIES NOT JUST TROPHY BEARS. I would request that you as the Board of Game Give this regulation change and/or as for a legislative request to get it into law if need be. If that can't be done then give the ADF& G direction to follow successful Moose and caribou management plans from around the state that has increased populations. Examples are Unit 17A moose management plan that has proven to be successful. Adopting *proposals 12, 13 and 14* that manage for residents would be a start. The focus should not be recreational and or sport hunting until the population can be rebuilt to harvestable levels for residents and nonresidents what I hear is there aren't enough moose to go around. I have attached a draft summary from Unit 9 meeting in Port Heiden.

Concluding comments for unit 9. I know that the wolves and bears have taken moose and caribou populations and brought them to a decline of embarrassing numbers. With little or no moose to eat wolves are adaptable and don't stop eating. In one of these past game meetings a few years back. Mayra Olsen an elder from Egegik commented humans will be added to the food chain a management tragedy. When we manage for predators and don't address the bear population I think bears are the next safety concern.

As a subsistence user and the representative of the region I will be attending and see you all at the Board of game meeting in Wasilla March 4-10, 2011.

Sincerely:

Frank Woods Subsistence Coordinator  
Bristol Bay Native Association  
Natural Resources Subsistence Division  
1-800-478-5257 ext. 342  
Direct 842-6442  
E-mail [fwoods@bbna.com](mailto:fwoods@bbna.com)



Faxed to 907-465-6094

P.O. Box 29  
Denali Park, Alaska 99755  
Feb. 17, 2011

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

Dear Alaska Board of Game members:

My wife and I would like to comment on Proposal 232, opening the Yanert Valley to motorized hunting. It is a terrible thing to consider on many, many counts.

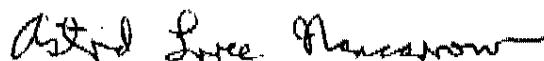
I have lived within one-half mile of the supposed access route since 1954. My wife has been here since 1964. At no time have the creeks and Yanert River been frozen to provide reasonable access to this area before Christmas, much less October.

The only parking available to hunters is along the Parks Highway. The 17b easement in this area goes through Ahtna land. Ahtna has a gravel pit at the head of the trail, and to protect their gravel pit and land they have put up gates and locked them. Hunters park in level spots along the road by driving off private entrances and leaving their vehicles in the right-of-way while they are hunting. It is already dangerous. If more people tried to park rigs that they used to transport their motorized vehicles, it would be a disaster.

As local subsistence hunters, we have not been able to use motorized vehicles for 50+ years in this area. It seems unreasonable that the area could now be opened up simply to decrease congestion at other trailheads. The parking situation here is considerably worse than any other places we know about.

This proposal needs a great deal of research, and should not be undertaken as a casual supplemental proposal. At the very least it should be considered at an interior Board of Game meeting in the future. It would create far more problems than it would solve.

Sincerely,



William J. Nancarrow  
Astrid Loree Nancarrow  
907-683-2376



# Science Now Project Comments <sup>Att: Scott Public Comment BOG Central SW</sup> March 2011 BOG Meeting

Wade Willis  
PO Box 100965  
Anchorage AK. 99510  
[sciencenowproject@gmail.com](mailto:sciencenowproject@gmail.com)

RECEIVED  
FEB 18 2011  
BOARDS  
ANCHORAGE

## **DO NOT SUPPORT Proposal 103 – Unit 16 Intensive Management Plan Reauthorization**

10 years after liberalizing brown bear sport hunting regulations with the single intent of reducing the brown bear population in Unit 16 to “potentially” increase moose calf survival, 6 years after authorizing aerial gunning of wolves, 4 years after adding black bears to the intensive management plan authorizing unlimited individual hunter & same day aerial harvest of black bears, including sows and cubs, and two years after expanding the harvest of any black bear to allow the snaring of any black bear, finally, in 2010 the department conducts a moose calf mortality study that they “claim” indicates brown bears may be a “driving” influence on moose calf survival.

So, the last months of 2010, ADF&G submit a proposal to “reauthorize” the Unit 16 intensive management plan (IM plan). Yet, they do not mention anything about recommending the liberalization of snaring of brown bears in the proposal based on their “unpublished” calf mortality study. The public receives the **high profile** and widely disseminated copies of the proposal book -- well in advance of the BOG meeting in March 2011. The public is given many weeks to consider the proposals and comment on them. The regional citizen fish and game advisory councils evaluate and submit comment based on proposal’s found in the actual proposal book.

Then along comes the highly secretive “draft” ADF&G analysis and recommendations document, found only on board supports website deep in the basement of the ADF&G’s “new” website. The navigation to the board of game page is new and the board’s page is very difficult to find. Yet, In that document, the ADF&G have suddenly decided that their proposal, 103, that the department submitted just a few weeks prior, suddenly, and without any warning, proposal 103 needs to be amended to authorize the “targeting” of brown bears by snare for the first time in Alaska’s history.

The public, relying on the proposal book have no idea that the ADF&G are recommending the amendment to their own proposal. Few in the public will be aware of the “new” recommendation so few, if any, of the public will comment on the issue of brown bear snaring. The regional citizen advisory councils have no time to address this “unexpected” last minute shift in the ADF&G generated proposal. The area biologist only attends a few meetings of the



local AC's. The public is once again marginalized and denied fair and equal representation on a fundamental wildlife policy issue that has been in place since statehood, that of snaring brown bears.

Not unlike the actions of the ADF&G in January of 2010, when at this Board of Game meeting, out of thin air, on the last day of the meeting, the ADF&G recommend amending a proposal to change the management status of black bears to a "furbearer" status.

This would allow the establishment of a general trapping season for the public, both resident and nonresident, for black bears anywhere in the state. This ADF&G generated amendment proposal is not accompanied by a draft regulatory language document, commonly called record of citation (RC) document for public review. No, the board of game accepts the ADF&G amendment and simply "intends" the change with a small amount of discussion.

The public has no prior notice the ADF&G plan to amend the black bear management status that had been in place since statehood - which prohibited the snaring of any bear using a trapping license. On the last day the 10 day meeting, and the last hours of that day's meeting, only two members of the public were left in the audience, Wade Willis and Rod Arno. The public has no indication of what the final regulatory language will be for another 6 months when the lieutenant governor issues the regulatory language change for official codification in the Alaska Administrative Code.

On July 1, 2010, the regulatory language is codified and what does the public find out. The ADF&G has secretly changed the codified regulations to also include the legal sale of black bear meat. This was not even discussed at the January 2010 meeting or any meeting during that regulatory year (RY 09/10).

At the October 2010 Board of Game meeting the ADF&G testified that changing the status of black bears to furbearer "automatically" authorized the legal sale of black bear meat. Kevin Saxby, with the Department of Law, watched the ADF&G make that statement and said nothing at all.

You see, the truth is that 5 AAC 92.200(b)(1) stated:

(b) Except as provided in 5 AAC 92.031, a person may not purchase, sell, barter, advertise, or otherwise offer for sale or barter:

(1) any part of a bear, except an article of handicraft, made from the fur of a bear.

Now the ADF&G decide to change the codified language to:

(1) Any part of a **brown** bear, except ....



That regulatory change has nothing to do with changing black bears to fur bearer management status. That change was never discussed by the Board of Game at the meeting in January 2010 when the board approved the "intent" of changing black bear management status to a furbearer.

Yet the board of game and Kevin Saxby with the Dept. of Law sat quietly and said nothing as the regulation was left in place by the Board of Game.

This example highlights the level of deception and outright illegal activities that are occurring during the last few years at Board of Game meetings. There are many other examples that need to be addressed. Deceptions by amending proposals with last minute "amendments" – changes requested by the ADF&G. This is deplorable and counterproductive to the intent of the board of game process, which is to fully engage the public, especially regarding fundamental and contentious wildlife management policy amendments.

The current moose calf mortality data has not been provided to the public for review. The Science Now Project, through a public records request, has obtained a copy of an "overview" of the 2010 data. That overview does not contain important information necessary for the public to evaluate the ADF&G's last minute amendment request to its own proposal.

Lacking in the ADF&G calf mortality report is:

- (1) Methods and timelines for determining cause of deaths;
  - a. How did the ADF&G determine the "predator" responsible;
  - b. If a brown bear, how does the ADF&G determine the number of brown bears responsible? Is this just a few bears that focus on moose calves, or is it opportunistic mortality by just a few bears in the areas, or do a large number of bears participate in "moose calf" mortalities;
  - c. Did wolves make the kill and then surrender it to a bear;
  - d. Did the calf die of natural causes and then scavenged by a bear?
- (2) Where did the calf mortalities occur? No map are provided to determine the habitat type or other conditions that might have contributed to calf mortality by bears;
- (3) No analysis of snow severity data;
- (4) No analysis of potential icing events that occurred in 2010, which was a year with severe and unprecedented icing events;
- (5) No disease or parasite analysis of newborn calves.

The current justification to include brown bears in an "experimental" snaring program lacks scientific justification and notice to the public.



**In Closing:**

At the October, 2010, meeting of the Board of Game, member Ben Grusendorf stated that as a legislator in 1994 when the Intensive Management Law was authorized by the Alaska Legislature, that bears were clearly debated and promised not be included in any intensive management plan.

The public has a right to have the Department of Law provide a legal opinion on this subject prior to any discussion on reauthorizing the Unit 16 Intensive Management Plan.

In light of the ADF&G claims of no predation by wolves in the 2010 moose calf mortality study, it would be prudent to suspend all aerial gunning of wolves pending more investigation into the current moose calf mortality issue. That the ADF&G has waited to conduct a moose calf mortality study after aggressively and randomly targeting wolves, black bears, and brown bears for nearly a decade, highlights the fact that the most fundamental and basic aspects of sound scientific management are not being followed. The ADF&G has not even determined a human harvest amount needed for moose in 16A. Yet the board aggressively promotes killing all but 8 wolves in 16A, an area that includes Alaska's most popular state park, Denali State Park.

Even more astonishing, the Board of Game has made a positive finding of customary and traditional use of wolves in Unit 16, yet refuses to establish an amount needed for subsistence in Unit 16, effectively eliminating a documented subsistence need for no other reason than a lack of interest in addressing legislatively mandated responsibilities to provide for the minimum subsistence needs of Alaskans, including for wolves.

The Unit 16 Intensive Management Plan is not based on sound science and ignores important legislative intent to protect subsistence harvest of wolves. Continuing the program cannot be justified at this time pending further scientific investigations and both public and scientific review of any data in the future.

Wade Willis





# Alaska Outdoor Council

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March 17, 2011

ADF&G

ATTN: Board of Game Comments

Boards Support Section

P.O. Box 115526

Juneau, AK 998811-5526

## AOC Preliminary Recommendations on GMU13 Tier I CHP hunt proposals. Alaska Board of Game March 2011, Region IV Meeting.

**Proposal #48 Adopt.** Repeal any Community Harvest Permit (CHP) hunt for caribou or moose in GMU 13 that does anything more than to allow Alaskan hunters to pool their permits.

Nothing in the State's subsistence statute requires the Alaska Board of Game (board) to segregate out Alaskan hunters based on varying patterns of their wildfood gathering racial and/or religious beliefs. That is just what the board, by a vote of 4-3, has chosen to adopt. By adopting proposal #48 the board can undo their unconstitutional regulation, RC52, adopted at the October 2010 meeting.

Periods of high harvestable surplus of Nelchina caribou, the DOL representative to the board calls this a "Tier I Plus" situation, as well as increases in moose numbers in GMU13 are providing a reasonable opportunity for subsistence uses of those game populations currently under both state and federal subsistence hunting regulations. No action is necessary by the board to differentiate between Alaskan hunters at the current harvests levels set for the Nelchina caribou herd. Reasonable harvest opportunities for subsistence uses are being met.

Active game management by ADF&G continues to increase the available harvestable surplus for all hunters in **GMU 13** on;

- **9.45 million acres** -- of state owned land
- **4.2 million acres** -- of federal lands where extra harvest opportunity is provided for around 6,000 federally qualified rural Alaskan residents. (Each federally qualified local resident gets two caribou and one moose permit annually, with no household restrictions.)
- **1.3 million acres** -- of privately owned Alaska Native Claims Settlement Act (ANCSA) lands in GMU13, which were set aside partially for their ability to provide Alaskan Natives with a future subsistence harvest, which benefit from active game management.

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The board can find ample justification under 5 AAC 99.025(b) and (c)(1) and (2) to determine that a "reasonable opportunity for subsistence uses" of moose and caribou in GMU 13 would be provided for under a Tier I registration hunt.

5 AAC 99.025(b) In order to establish an amount reasonably necessary for subsistence uses under this section and whether a reasonable opportunity for subsistence uses exists, the Board of Game will, as the board determines is appropriate, attempt to integrate opportunities offered under both state and federal regulations.

(c) In this section,

- (1) "amount reasonably necessary for subsistence uses" includes the total amount of animals from a population that must be available for subsistence hunting in order to provide a reasonable opportunity for subsistence uses, under state and federal subsistence hunting regulations, where both exist;
- (2) "reasonable opportunity" has the meaning given in AS 16.05.258(f) For purposes of this section, "reasonable opportunity" means an opportunity, as determined by the appropriate board, that allows a subsistence user to participate in a subsistence hunt or fishery that provides a normally diligent participant with a reasonable expectation of success of taking of fish or game.

**Proposal #50 Amend and adopt.** Amend out the racially based Copper River Basin CHP and lift restriction on numbers of Nelchina caribou Tier I registration hunt permits per household. All Tier I Nelchina caribou subsistence hunt permits will be issued to Alaskan residents as Tier I registration hunt permits.

By law whenever the harvestable surplus of a C&T game populations is above the low end of the range determined to be the amount reasonably necessary for subsistence uses (ANS) the population is in what the DOL representative to the board referred to as a "Tier I Plus" hunt. (Sec. 16.05.258(b)(1) thru (3)). The state subsistence law does not allow for the board to distinguish among subsistence hunters at this level. Getting as many caribou hunt permits as there are hunters in one household for Tier I CHP hunters and only one caribou hunt permit for the entire household of hunters under the Tier I registration hunt is unlawful in a "Tier I Plus" situation.

**Proposal #61 Oppose.** The Board should repeal the 2009 GMU 13 Ahtna CHP moose allocation.

Any-bull moose permits for GMU 13 should be made available in a Tier I registration hunt, on a point system that allows for a rotation among Alaskan hunters when harvestable surpluses are above the low end of the ANS range and bull/cow ratios are above management objectives. Additional subsistence moose harvest for federally qualified Alaskan residents living in GMU13 is made available on millions of federal acres in nearby GMU 11 and 12. A reasonable subsistence opportunity for moose is being met by current state and federal subsistence hunting regulations.

Rod Arno

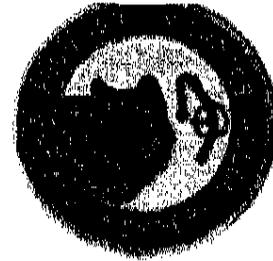


Executive Director

Alaska Outdoor Council

*"Protecting your Hunting, Trapping, Fishing and Access Rights"*  
*The Official State Association of the National Rifle 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: 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



2/18/11

**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**

Subject: Opposition to Proposal #232

To whom it concerns:

I am writing to express my opposition to proposal #232. I have concerns about safety, the suitability of motorized access in the Yanert area and the lack of other solutions considered, and the appropriateness of considering this issue in a meeting that is not focused on the Interior.

The Yanert CUA has seen increased use in the last several years. I currently live in the area, and have noticed an increasing number of vehicles parked at the main access point to the Yanert CUA. Proposal 232 discusses access issues at other sites (i.e. Rex, Ferry), but does not address the fact that the main access point to the Yanert CUA is already overcrowded, with no true parking areas other than alongside the highway, and is beginning to see the effects of overcrowding with litter and human waste that is left behind. Opening the area to motorized use after September 30<sup>th</sup> will simply prolong the safety issues and impacts to this already-impacted trailhead.

While the Fairbanks AC suggests there is a need to increase antlerless moose harvest, it is stated in the proposal that no other solutions were considered for the issue raised. Considering the area's importance to the non-motorized hunters that do utilize it (in increasing numbers as pointed out above), it seems more appropriate to work with improving existing points of access, rather than opening up the area to additional modes of access. There are many hunters who appreciate the non-motorized hunting experience. This proposal does not consider ways to improve access for this type of user, and should consider improving the existing trailhead to non-motorized users (thereby increasing non-motorized use) before opening the area to motorized hunting access.

Lastly, while I understand that the Fairbanks AC hoped to include discussion on this proposal within the context of the antlerless moose hunt, it seems that the proposal's more appropriate audience would be through the Interior Board of Game meeting.

This is not supported locally, and even the local Middle Nenana AC has voiced its opposition. Please vote no on Proposal 232, and maintain non-motorized access in the Yanert CUA.

*H Ragland*

Hannah Ragland

PO Box 657

Denali Park AK 99755



**Tim Schmiede**

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**To:** ADF&G**Subject:** Proposal 70-5AAC92.540

In response to the 1/4 mile non motorized corridor of the Maclaren and the Susitna Rivers. The Susitna River is the main artery of unit 13. This is completely uncalled for. The whole north side of the Denali is non motorized from the Su. to Paxon. The East side below the highway of the Maclaren is non motorized for about 20 miles. There is plenty of safe haven for the moose and Caribou. I have witnessed ATV use along the river system and from what I have seen is the ATV are used only for game retrieval. I have been hunting the area for a lot of years. If there is a user conflict it is because someone wants to be non motorized they are hunting in the wrong area. It is the other side of the road. Besides I doubt very much if someone is down the river that far they did not walk in. There are a lot of people in the field in a short amount of time. With the population expansion of hunters it only gets more crowded in the same amount of time. But making more rules and regs is not the answer, that is the problem with this country now. It is the answer for the people that can't seem to accept the fact that there is going to be other people out there and how they got there is their business. I am opposed to this proposal.

Tim Schmiede





IN REPLY REFER TO:  
RE/8097.jm

## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

1011 E. Tudor Road  
Anchorage, Alaska 99503-6199

FEB 18 2011



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

Dear Chairman Judkins:

The U.S. Fish and Wildlife Service (Service) appreciates the opportunity to comment on proposals and policies to be considered by the Alaska Board of Game (BOG) during its March 4-10, 2011 session of the Central/Southwest Region as well as additional issues around the State. It is not clear if the BOG will be addressing the draft bear and wolf management policies at this meeting or at your meeting later in March, therefore we have also included our comments on those policies. We have comments on proposal 223 concerning discretionary authority that may impact Koyukok, Nowitna, and Selawik National Wildlife Refuges (NWRs). In addition, we have comments on Proposals 25, 27, 28, 29, 38, 121, and 119 which all include some provisions for predator control on Togiak and Yukon Delta National Wildlife Refuges.

Regarding the bear and wolf policies, the Service would like to see the second purpose listed in the bear policy that reads "*to encourage review, comment, and interagency coordination for bear management activities*" to also be included in the wolf policy. In addition, we think there should be direction to the Alaska Department of Fish and Game (ADF&G) to work with the Service and other federal agencies to describe how this "*review, comment, and interagency coordination*" would be implemented. We would be happy to work with ADF&G on this endeavor.

Proposal 223 could repeal discretionary hunt conditions and procedures regarding the nullification of trophy value for animals taken under subsistence permits. The Service understands the need to periodically review discretionary authorities. However, the Service would be opposed to the removal of the discretionary authority to require the nullification of trophy value from the ADF&G at this time. This is a valuable tool allowing managers to limit harvest in areas without initiating alternative hunt management strategies such as Tier II permits or drawing hunts when a wildlife population cannot support harvest from all user groups. Removing this discretionary authority could lead to increased competition as well as user conflicts in several of the areas where nullification of trophy value is required. Additionally, this tool has been used as the foundation of

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certain management plans, i.e., Koyukuk River Moose Management Plan, and if eliminated, could invalidate these joint planning efforts.

Proposals 25, 27, 28, 29, 38, 121, and 119 all include some provisions for predator control in multiple units with refuge lands.

The Service opposes all these proposals as written for NWR lands. The Service is legally precluded from managing NWR's with a singular focus to reduce predator populations to benefit human harvest of a prey species. As such we cannot support intensive management of game populations on refuge lands to simply improve human harvest. We are required to go through an environmental analysis of actions that would include predator control prior to making a final decision as to whether it is appropriate on refuge lands or not.

These proposals do not include any quantitative information on target or expected predator harvest levels resulting from these proposals, nor does it include any quantitative information on expected responses of ungulate populations. At a minimum, this information would be needed as a starting point for evaluation before we could allow such activities on refuge lands.

Thank you for your time to review our comments on these important issues. If you have any questions please contact Jerry Berg, Subsistence Coordinator at (907) 786-3519.

Sincerely,



Regional Director



1338 F Street  
Anchorage, AK 99501

.....  
**Russ Webb**

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

Re: Bear Conservation, Harvest, and Management Policy

Cliff Judkins, Chairman  
Board of Game Members:

I am writing to express my opposition to the proposed Bear Conservation, Harvest, and Management Policy you will be considering at your next meeting. I believe adoption of the policy and particularly those aspects of it relating to Managing Predation by Bears proposed "to comply with AS 16.05.255" would be harmful to Alaska's bear population, Alaska's hunters, and Alaska's reputation as one of the best managers and conservators of wildlife populations.

I recognize that at some times, in some areas it may be necessary to focus specific efforts on reducing bear populations in order to maintain healthy populations of prey species. However, I believe that many of the methods of taking bears (and disposing of bear parts) proposed in the policy will do far greater harm to Alaska than any good they could possibly achieve in reducing specific populations of bears.

**SALE OF BEAR PARTS**

I believe allowing the sale of bear parts for handicraft items diminishes the value of bears as trophy animals and will encourage poaching of bears. It's true that the policy proposed continues to prohibit sale of gall bladders. However, allowing the legal sale of other bear parts will simply make enforcement efforts more difficult and will inevitably lead to greater illegal trafficking in bear gall bladders, since these are the most lucrative parts by far.

In my opinion this measure has no place in a predator control policy and really has nothing to do with predator control. Rather it is, quite simply, the commercialization of a fabled game animal - most transparently so when combined with other measures such as same day hunting, and use of helicopters for transporting hunters and equipment. If we are commercializing other bear parts, why not legalize the sale of bear gall bladders along with them? Bear gall bladders .....



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WILL be sold in even greater numbers if these policies are adopted, so why not just acknowledge reality. Doing so would certainly save a lot of otherwise wasted effort and expense in futile enforcement efforts.

### **TAKING OF SOWS WITH CUBS AND CUBS**

There is very little the Board of Game could do that would harm Alaska's reputation and diminish the trophy value of bears more than allowing the taking of sows with cubs and cubs. Under no circumstances could this be considered fair chase hunting and it should not be allowed as a "hunting" activity in which the general public may engage.

If the Board of Game and ADF&G find, on the basis of hard scientific data, that killing sows with cubs and cubs is necessary to protect prey populations in certain areas then it should be undertaken by professional ADF&G personnel **ONLY**. Allowing killing of sows with cubs and cubs should be treated as just that - killing, and we should not pretend that it is any form of fair chase "hunting" allowable with a hunting license. Killing should be done as quickly and efficiently as possible and by professionals. It should have **no relationship** to actual hunting activities. Confusing the two activities would diminish the fair chase hunting experience, diminish the sport of hunting, and diminish Alaska's reputation as one of the world's pre-eminent places to experience true fair chase hunting.

### **USE OF HELICOPTERS FOR TRANSPORTING HUNTERS AND EQUIPMENT AND USE OF ELECTRONIC COMMUNICATION**

I cannot adequately express the level of my opposition to nor my disgust with the inclusion of a proposal to allow the use of helicopters in association with hunting.

Use of helicopters for transport of hunters and gear would be among the worst possible measures the Board of Game could endorse or adopt. There is no possible scenario of which I can conceive that the use of helicopters for transporting "hunters" and equipment could be considered "fair chase" or "hunting". Allowing such means of transport to and from the field would invite the worst of the worst of the lazy, ill-prepared, and un-skilled "slob hunters" to "take the field" in Alaska.

It would diminish the real trophy value of **all** bears taken in fair chase by real hunters. It would also tarnish Alaska's reputation among hunters worldwide as **THE** pre-eminent place for fair chase hunting and particularly fair chase hunting of bears.

Allowing transport by helicopter would encourage poaching and make enforcement of game laws far, far more difficult (particularly when coupled with other proposed measures such as use of electronic communications in hunting bears.)

Use of helicopters and electronic communications **IS NOT** fair chase hunting. It is little more than couch surfing while carrying a rifle. Adopting this proposal starts Alaska on a very slippery slope indeed.

Will we next see a proposal to legalize a set-up of video cameras on bait stations with remotely controlled firearms so "hunters" may "shoot" from their computers?



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This would clearly allow more "hunters" to "participate" without having to leave their easy chairs and suffering the indignities of actually taking the field. It would certainly be an "efficient" means of reducing bear populations. And, to generate revenue we could go a step further and auction off the shots. We would certainly have far, far more "hunters" participating each year and a much easier time controlling bear populations.

These are not game management techniques. They are not predator control techniques. They **ARE** transparently game commercialization measures - measures that will make it possible to "sell" more "hunts" to the inexperienced and pampered who don't want to have to exert themselves to get a "trophy" through fair chase.

Managing Alaska's wildlife is becoming more and more difficult as Alaska's population growth increases the competition for wildlife resources. I understand that it is a difficult job to balance the varying demands and I thank you for investing your time and energy in trying to find ways that strike the right balance. I also understand that as human "demand" for consumptive uses increases we will inevitably find that even our huge state does not have sufficient habitat to enable us to meet the ever-growing demand. We will have to increasingly "manage" ourselves and how much of our demands can be met. Managing ourselves will test our principles many, many times.

I recognize and acknowledge that predator control generally, and bear control specifically, are a necessary part of overall wildlife management. I appreciate your effort to find appropriate ways to accomplish that control when required. However, I do not believe that the proposals mentioned above should be a part of predator control or wildlife management efforts. I believe they would be too harmful to Alaska's wildlife, Alaska's hunters, and Alaska's great hunting tradition and heritage.

I urge you not to adopt a Bear Conservation, Harvest, and Management Policy that includes the provisions I have referenced.

Thank you for your work and for considering my comments.

Respectfully,



Russ Webb



PG. 287

SUPPORT REVIEW

PROPOSAL 222 TAKING OF GAME BY PROXY:

PLEASE ELIMINATE SITKA BLACK-TAIL FROM THE REQUIREMENT OF ANTLER DESTRUCTION. WE NEED NOT DISCOURAGE OUR YOUNG HUNTERS BY ASSUMING THEY WILL BE UNETHICAL IN THEIR PURSUIT OF PROVIDING FOR THOSE WHO CAN'T PROVIDE FOR THEMSELVES ANYMORE. IF THERE'S PROOF OF CONSTANT ABUSE OF THE REG'S THEN SO BE IT, BUT AFTER 40 YRS OF HUNTING & RESIDING IN G.M.U. 1A I HAVE NOT SEEN IT. PLEASE REMOVE THIS BURDEN FROM YOUNG & OLD ALIKE.

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SUPPORT

BOARD OF GAME WOLF MANAGEMENT POLICY:

I WOULD LIKE TO CONGRADULATE THE STATE OF ALASKA & BOARD OF GAME FOR DRAFTING A DOWN TO EARTH, COMMON SENSE WOLF POLICY FOR THE NEXT 5 YRS. I ONLY WISH THAT WITHIN THIS DRAFT THE STATE COULD HAVE INCLUDED SOME KIND OF ACCOUNTABILITY CLAUSE FOR INDIVIDUAL STATE GAME MANAGERS WHO WON'T TAKE EXCESSIVE WOLF PREDATION SERIOUS. MY KIDS DESERVED BETTER.

THANK YOU

ROBERT JANUKE

WARD COVE AK.



February 16, 2011  
Alaska Board of Game  
Boards Support Section

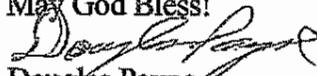
In regards to the proposed changes for units 9, 10, 11, 13, 14, 16, and 17, I would like to make the following comments.

I first hunted Alaska twelve years ago in what was either unit 9 or 17. When I left, a part of me stayed there. I returned in 2004 to train to be an assistant guide in units 17 and 19. I have been a licensed assistant guide since 2005 and worked in those units for two years as pilot and guide. While I have been working in other unit the last few years, I long to return to unit 17.

As everyone knows, the wolves, bears and man have been a problem for caribou and moose in that area. I only want to speak to one of these which are the bears. There were a lot of bears both brown and black back in 2006. I have heard that they are even more populated now. I believe that the numbers will have to be reduced before there is much recovery for caribou and moose. This can be done if more hunters go and harvest brown/grizzly's there. I believe there needs to be some extra incentives to draw the hunters there however. Perhaps a two bear per year limit for brown/grizzly would help. I understand the season opens earlier now which should help also.

I believe the state of Alaska and it residents need the nonresident guides and hunters to not only bring revenue to the state but to help maintain the proper balance of wildlife. I also believe that we as outfitters and guides need the support of the native Alaskans. It will take all of us working together to take on this monumental task.

May God Bless!

  
Douglas Payne



Jeffrey Wasley  
413 5<sup>th</sup> Ave N  
Onalaska, WI 54650  
Phone 608-385-4580

Post-it® Fax Note	7671	Date	2/18/11	# of pages	3
To	Alaska BOG	From	Jeff Wasley		
Co./Dept.		Co.			
Phone #		Phone #	608-385-4580		
Fax #	907-465-6094	Fax #			

Feb. 10, 2011

Alaska Board of Game  
Boards Support Section  
PO BOX 115526  
Juneau, AK 99811-5526

Dear Alaska Board of Game,

I am strongly opposed to propositions 193 and 194. These proposals will take hunting opportunities away from Alaska duck hunters and will not help the resource. Proposal 194 has no merit and would hurt the guiding industry in Alaska for no gain for the resource. I am an Alaskan Waterfowl Guide and see no reason to further restrict duck hunting regulations in Alaska. Most of the hunters we take are from the lower 48 and therefore already have more restricted regulations and smaller bag limits for sea ducks. Duck hunters deeply care about the birds that we hunt and respect them while we hunt. That is why duck hunters formed groups such as Ducks Unlimited and Delta Waterfowl. These groups were started over 80 years ago by duck hunters who were very concerned over the well being of ducks and geese. This respect has been passed on through generations of duck and goose hunters and is stronger than ever. We make every effort to retrieve wounded birds and utilize them all. Some sea duck species are actually good to eat when prepared properly. The stronger tasting ones can make excellent summer sausage and snack sticks. We also understand and appreciate the principles of wildlife management and understand that sometimes we have to reduce or expand harvest on certain wildlife populations to properly manage them. If Waterfowl managers deemed these restrictions necessary through proper research and analysis we would support their decisions.

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 (and certainly not to specific hunting management units within the State). 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 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 Goldeneye 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 management regulations unless disproven by proper scientific investigation.

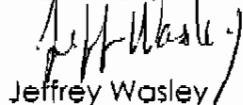
In conclusion, I hope the Board of Game will take these comments into consideration and ultimately decide to oppose Proposition 193. This proposal would negatively impact the opportunity of countless waterfowl hunters across the State to harvest Goldeneye species without any substantiated evidence that a change in management regulations would have beneficial impacts to Goldeneye populations in Alaska or across North America.

Citation Source:

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.

I am strongly opposed to propositions 193 and 194.

Thank You,



Jeffrey Wasley  
Owner, Four Flyways Outfitters, LLC



February 11, 2011

Attn: Board of Game Comments  
Alaska Department of Fish & Game  
Boards Support Section  
907-465-6094

I am writing in opposition of the proposed changes for GMU 20A, Yanert CUA and the expansion to make this a motorized hunting area.

We do not have infrastructure to accommodate motorized access in this area. There are no services, gas stations, rest areas, restaurants, lodging or parking available. There is already a significant impact with non-motorized users in the fall. Trucks, trailers, animals and their waste are already crowding areas along the highway, in the ditches and sometimes in residential driveways. The idea of dozens of ATV's and snow machines, trailers and the waste associated with increased use (human and otherwise) would devastate the trails and this area.

Typically, we do not have sufficient snow cover for snow machines in October, so the indication that these would be the primary users is false and misleading. There are very few places along the road corridor that are reserved for non-motorized users to utilize. It would be a travesty to destroy this opportunity for those who choose to pursue their harvest in this way.

As a member of the Denali Emergency Rescue Team, this increase in use could seriously impact our search and rescue area and the number of incidences we respond to. Our emergency services are seriously limited in the fall and winter months for this area. We are not prepared to respond to this increase in use.

I agree with the public comment that there "has been too much focus for harvest along the Rex Trail, Ferry Trail and in the Goldking area." But opening this area will not alleviate that pressure; it will just cause another problem area that has congested, overused and trashed trails.

Sincerely,



Jill Boelsma  
PO Box 105  
Cantwell, AK 99729



Attn: Board of Game Comments  
AK Dept. of Fish and Game  
Boards Support Section

Regarding Proposal 232 to allow motorized hunting in the Yanert CUA.

This is got my feathers ruffled. No.1 the cow moose hunt shows the stupidity of the Department of Fish& Game and the Biologist who is conducting this experiment on the basis of bull to cow ratio and over grazing! I've observed the effects of their experiment after 5yrs. of slaughter on the rex trail. The Wood River is near cleaned out of cow moose who migrate from the Tannana Flats, from 7 cow to 1bull, to 7bulls to 1cow! This is no exaggeration. Traveling hundred miles on foot and horse back I see no overgrazing. I question the motive behind this experiment. Any cattle Rancher can tell you that this don't work. By a winter cow hunt you kill the calf, or calves she is pregnant with, that's 3! This is not sound management!

The past two falls, there has been twin orphaned moose calves in my pasture , 1yr old. Hunters shot their mother at the end of my drive-way and 100yrds behind my house near mile 220, Parks Highway. The calves died! Its getting to be combat hunting out there created by miss-management by the State and their shortsightedness. There are only two accesses to the Yanert, Where are these 300 hunters gonna park? Or will they take the path of least resistance and hunt in our back yards? In a few years there be no moose to hunt in our area! The a.d.f.g will close it down and blame it on the hunters and wolves! I appose their proposal 232!

Yours Truly, 40yrs hunting, trapping and packing hunters in and out of the bush  
Alaska!  
James M Van Bebber



**Board of Game Comments  
Alaska Dept. of Fish & Game  
Boards Support Section  
FAX: 907-465-6094**

**2/17/11**

**To Whom It may concern:**

**This is to advise you of my opposition to any easing of restrictions to motorized access to the Yanert Valley (GMU 20).**

**As a 20-year property owner, local business owner, and resident, I have observed first hand the road-side and backcountry effects of motorized access. Vehicle and trailer parking, along with associated staging activities often are unmonitored, unenforced, and constitute a nuisance to local residents. Driveways, property breaks, etc. become de-facto access points. It is the property owner who is left holding the bag for the public's "right to access".**

**Additionally, in my case the property I own happens to be an airstrip that fronts the Parks Highway. Unauthorized use by aircraft desiring access to the area would constitute an extreme liability and nuisance, not to mention obvious safety concerns that arise from unauthorized/unmonitored use. Unauthorized trespass or crossing of the airstrip by snow machines, etc. to access hunting areas would constitute an extreme hazard to aircraft. Increased traffic in the area would present security problems for my facility and other local residents.**

**The existing restrictions were put in place to address these problems, and they have effectively done so. The Yanert Valley remains a relatively pristine environment uncorrupted by mass access (an important attribute for an area that borders a national park). Removing these restrictions would benefit so few, and could potentially harm so many, that it becomes a poor trade-off.**

**Please DO NOT grant motorized access to the Yanert Valley.**

**Sincerely,**



**R.D. Rosso  
Mile 229.5 Parks Hwy.  
(907) 748-2800**



Aase Karine Dane  
PO Box 198  
Cantwell, AK 99729

2/18/2011

Alaska Board of Game  
Boards Support Section  
PO Box 115526  
Juncau, AK 99811-5526

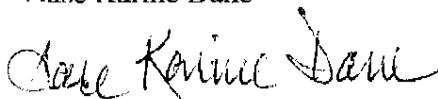
Re. Proposal 232, Controlled Use Area Unit 20:

I have resided at MP 229 Parks Hwy since 1974 and have used the Yanert Valley as my primary place for berry picking and recreational forms such as skijouring, skiing, snow machining, and hiking. In that period of time the amount of use of this area has escalated considerably, not only because of population growth in the immediate area, but also because of increased guided horse hunts and fly-in hunts coming in from outside the area. Because of limited access, the existing trail-to-trails show noticable degredation along with rubbish left behind.

When I used to be out on the trail in those early days, moose sightings were common-place: Not so much so any more. I suppose this is to be expected what with the increased use by people in that time, but it doesn't justify even more use.

PLEASE DO NOT ALLOW MOTORIZED HUNTING IN THE YANER VALLEY.

Sincerely,  
Aase Karine Dane



February 16, 2011

Alaska Board of Game  
Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811-5526  
FAX: 907-465-6094

Dear Sirs:

We oppose Proposal 232, which would open the Yanert Valley in Unit 20A to motorized hunting each season from September 20<sup>th</sup>.

More than a desire to meet intensive management goals, this area must be evaluated for a wide range of impacts:

1. It demands an evaluation of the loss of a "controlled use" area, a quality that is important to hunters who currently use the area and is a value that has been in place here for decades.
2. It introduces a new level of impact and safety issues.
  - a. There is only one 17b easement from the Parks Highway over privately held land to the state lands in question. Permits must be acquired for legal access.
  - b. No highway pullout for vehicles and trailers exists at the easement site, which opens the possibility of unlawful trespass into nearby driveways and homes along the highway and unsafe parking in the highway right-of-way.
  - c. No trash/litter control system exists
  - d. The taiga and tundra habitat that must be traversed would create significant habitat destruction at a time of year when alternate freeze/thaw cycles occur. Although the proposal discusses the use of "mostly snowmachines, October can often be snowless. ATVs or OHVs, which create greater impacts, will use the Yanert Valley if not restricted.
3. Impacts to Rex/Ferry may or may not be mitigated by opening another region. Opening a new area to motorized access may simply bring additional impacts.



The Middle Nenana Fish and Game Advisory Committee has written a letter to voice its opinion of "no action" on Proposal 232. We agree with its position. Because of the proposal's significance, if discussed at all, it should be considered within a wider context than solely goals for intensive management at the level of the Fairbanks Fish and Game Advisory Committee.

Sincerely,

Handwritten signatures of Wallace and Jerryne Cole. The signature on the left is 'W Cole' and the signature on the right is 'Jerryne Th. Cole'.

Wallace and Jerryne Cole  
PO Box 67/Mile 227.5 Parks Highway  
Denali Park, AK 99755  
[wally@campdenali.com](mailto:wally@campdenali.com)  
907.683.2302



2/18/11

ATTN: Board of Game Comments  
Alaska Department of Fish and Game

Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

TEL: 907-465-6094

Subject: Opposition to Proposal #232

[Redacted]

I am writing to express my opposition to proposal #232. I have concerns about safety, the suitability of motorized access in the Yanert area and the lack of other solutions considered, and the appropriateness of considering this issue in a meeting that is not focused on the Interior.

The Yanert CUA has seen increased use in the last several years. I currently live in the area, and have noticed an increasing number of vehicles parked at the main access point to the Yanert

CUA. Proposal 232 discusses access issues at other sites (i.e. Rex Ferry), but does not address

the fact that the main access point to the Yanert CUA is already overcrowded, with no true

parking areas other than alongside the highway, and is beginning to see the effects of overcrowding with litter and human waste that is left behind. Opening the area to motorized use after September 30<sup>th</sup> will simply prolong the safety issues and impacts to this already-impacted

trailhead.

While the Fairbanks AC suggests there is a need to increase antlerless moose harvest, it is stated

in the proposal that no other solutions were considered for the issue raised. Considering the

area's importance to the non-motorized hunters that do utilize it (in increasing numbers as

pointed out above), it seems more appropriate to work with improving existing points of access,

rather than opening up the area to additional modes of access. There are many hunters who appreciate the non-motorized hunting experience. This proposal does not consider ways to

improve access for this type of user, and should consider improving the existing trailhead to non-motorized users (thereby increasing non-motorized use) before opening the area to motorized hunting access.

Lastly, while I understand that the Fairbanks AC hoped to include discussion on this proposal within the context of the antlerless moose hunt, it seems that the proposal's more appropriate

audience would be through the Interior Board of Game meeting.

This is not supported locally, and even the local Middle Nenana AC has voiced its opposition. Please vote no on Proposal 232, and maintain non-motorized access in the Yanert CUA.

H England

Hannah England



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

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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



I am writing in opposition to BOG Proposal #50.

This program jeopardizes the rights of individuals to game resources throughout the state and is another arrangement likely in contradiction to the Alaska Constitution.

Alaska needs to return further to equal treatment to all as required by our Constitution and this program moves in the opposite direction.

The complex and somewhat vague language also has the potential to expand into something far greater than the current intent.

I urge you to reject further consideration of this scheme and return traditional method of allocating our game resources. Federal requirements and State Tier II rules already provide for special privileges for specific groups.

Thank you,

Kenton Braun  
Anchorage



To: Alaska Board of Game. *907-465-6094*  
From: Richard Bishop, 1555 Gus's Grind, Fairbanks, AK 99709  
Date: 2-16-2011

2 pp

In summary I oppose Proposals #50 and #204 and support #48.

RE: Proposal #50

This is a cleverly written proposal. It looks like there's something for everyone who wants to hunt caribou or moose in GMU 13, as though all Alaskans' interests are being considered.

In reality, it is a rural priority proposal in disguise. In spite of its window dressing, it's like that old fable - "The Emperor has no clothes!"

The Emperor's brainwashed stooges sought favor by all agreeing that the Emperor's imaginary new clothes were beautiful, until a child in the crowd cried "The Emperor has no clothes!" This rural/Ahtna priority proposal has no clothes.

Proposal # 50 would commit the State of Alaska to agree, through the CHP, to put in law and promote, enforce, and defend the cultural values and former customary and traditional practices of one special interest group as the standard for subsistence use of caribou in a specific Community Hunt Area. It would take this action on the unsubstantiated premises that it is necessary to ensure adequate resources for local rural people, and that this is the "gold standard" for subsistence use of caribou in GMU 13.

The potential effects of this regulation include:

- \* Promoting a blizzard of CHP proposals, each with its unique requirements, further bogging down the regulatory process and inviting litigation.
- \* Claims for priority use wherever CHP's are adopted; the likely result being claims to virtually all harvestable surpluses, eliminating allocations to individuals through other regulations such as Tier I or random drawings. That seems likely for the random drawing part of Proposal # 50.
- \* Undermining "common use" and "equal opportunity" protections in the AK Constitution.
- \* Ignoring the fact that in GMU 13, the presumed ANS as it relates to local people could easily be met under federal regulations and exclusive use of extensive Ahtna corporate lands by Ahtna shareholders. If more



opportunity were needed to meet State legal obligations, the Tier I process would serve better than a CHP.

It is not the right or responsibility of the State, the BOG, the Dept of Law, or the ADF&G to institutionalize favoritism of the values and practices of one special interest group over the general public interest - be it on behalf of cultures, religions, races, communities, or etc.

This proposal is more about putting in law special recognition of a special interest group than it is about providing food, materials or the context for cultivating cultural values.

The State can and does provide opportunity to use the common property game resources. The State has no business making regulations or statutes that promote the values of one special interest group over others.

Personally, my fishing, hunting, trapping and other resource uses are fundamental to my culture, customary and traditional practices, and values. I strongly object to proposal # 50 which cleverly implies that my values are inferior to someone else's - and says the State will make that inferior status LAW!

*Richard H. Bishop  
(By Mary L. Bishop)*



From Walter G. Hanni  
8630 Bluffwood Ctr  
Anch Ak 99502

2-15-2011

To Whom it may concern

I have recently become aware of CHP's Proposal # 50. If I understand it correctly it seems to Allocate a certain number of animals from the harvest total for ceremonial purposes. In addition it seems to charge the state with administrative or enforcement procedures related to the special harvest.

In my opinion this kind of special allotment should not be made. It sets a bad precedent for all fish & game stock. Puts government officials in roles they have no business in.

Sincerely Walter G Hanni

Faxed to

907-465-6094



Attn: Board of Game Comments  
AK Dept. of Fish and Game  
Boards Support Section  
Fax: 907-465-6094

**RE: Proposal 232** to allow motorized vehicle access in the Yanert Controlled Use Area in Unit 20A to be considered at South Central Region Board of Game Meeting, March 4-10 in Anchorage.

**I am writing to express my opposition to Proposal 232.** As a year-round resident living at mile 228 across the highway from the sole legal access to the Yanert, a property owner and an avid user (for recreating, berry picking & wildlife viewing--caribou, birds, etc.) of the area in question, I would like to point out the many flaws and untruths about the above proposal.

- There are **no facilities** at the trailhead of the only legal access into the Yanert Valley. This means no trash receptacles or collection, no restroom facilities, and no parking. In the fall, trucks and trailers crowd the highway ditch near the trailhead, sometimes parking in residential driveways and blocking visibility for turning vehicles. This is already a problem and will only get worse, especially in winter when the snowy ditches are not an option. I have come across human feces in my driveway in the past and shudder to think how much more waste would be left behind with a significant increase in use. I assume some of these issues of waste and crowding are included in the statement that there are "negative, social aspects" that are an issue at the Rex and Ferry Trails. Opening the Yanert to motorized access for hunting will only spread these issues to the Yanert area; it will not alleviate the problem.
- The proposal suggests that there are no major late freezing rivers and therefore the Yanert CUA offers easier or earlier winter access. Those of us familiar with this area know this is a false assumption. The Yanert is traditionally a late freezing river, often not travelable until after the Nenana River has been frozen for a few weeks. In addition, overflow is very common the the Yanert and all of the drainages that feed it, sometimes rendering the Yanert untravelable all winter. In addition, there are further dangers, such as avalanches. Motorized use will ease access up into avalanche prone terrain. As someone who has personally been involved in an avalanche in the Yanert area, as well as a member of the local emergency rescue group, I have great concern for increased use in this tricky area that will be unfamiliar to most who take advantage of the motorized hunt (as they will mostly be out-of-area hunters), and the very limited resources for assistance and rescue.
- Opening motorized access for hunting as of October 1, when there is not reliable or adequate snow cover, means access will be via ATVs and ORVs (the proposal falsely suggests that the increase will come mainly in the form of snow machines) in the early part of the winter. There is already significant damage to the access trail caused by horses in the fall; these motorized vehicles would devastate the trail, rendering it unusable by other users, such as joggers, bikers, those hunting and hiking by foot, as well as skiers and dog mushers in winter. Often the snow cover is very low in this area



and damage to the tundra in the higher elevations would also occur.

- One of the most disturbing and false aspects of this proposal is the suggestion that the moose harvest quota could increase with more access to the Yanert, and that it would help to reach goals for Unit 20A. The Yanert CUA has traditionally had one of the lowest, if not **the lowest densities of moose** in all of Unit 20A. This assertion is supported not only by those of us who travel in this area, but also by the AKF&G biological surveys. I rarely see moose or moose sign in the Yanert Valley. I question whether the Fairbanks AC that drafted the proposal has considered the known low density of moose in the Yanert. It is telling that the local Middle Nenana Advisory Committee opposes this proposal.

It makes sound sense to leave the Yanert CUA as a completely non-motorized hunting area. There are too few moose to support increased pressure and the various negative impacts this proposal would bring. It is most appropriate to leave the Yanert as non-motorized, recognizing it offers a unique opportunity for a segment of hunters who choose to hunt in a non-motorized way. The chance to hunt via dog team is richly rooted in Alaska's history, yet is increasing being squeezed out. **The Yanert, with very few moose and tricky terrain, is the perfect place to have as non-motorized for those wishing to test their skills and pursue this traditional style of hunt.**

I urge the board to give weight to those comments that come from people who know this area intimately, to honor a diversity of interests among all the users of this state, to use sound science when changing harvest and access opportunities, and to follow the advice of the local (Middle Nenana) AC on this issue. I urge you to reject Proposal 232.

Thank you for your time and consideration.

Sincerely,

Anne Beaulaurier  
Mi 228 Parks Highway



Feb. 15, 2011

TO: ALASKA BOARD of Game

FROM: Clinton W Crosberg  
PO Box 588  
Delta Junction, AK 99737  
ph- 907 895-5060

Subject: Community Hunt Permit / Proposal #50

Dear Board -

I oppose the Prop #50 CHP & do not believe it is needed. All rural Alaskans living in the hunt area can get the Federal Subsistence tags that allow 2 caribou per year from the Nelchina herd. Also they can apply for the State Nelchina hunt ~~as~~ as well.

Vote No on Prop 50. It's is not necessary and unfair to the rest of Alaska residents.

Thank you,

Clinton W Crosberg



## PROPOSAL #50

### OPPOSED

I am **opposed** to the Board of Game's Proposal #50 which would allow Community Hunt Areas and Permits throughout Alaska. This proposal is in conflict with the state Constitution and is not equitable to all Alaskans.

Tom Lamal

1734 Becker Ridge Road

Fairbanks, Alaska 99709



until all ALASKANS  
are treated equally  
you will always have  
racial divide. Vote NO  
on Community Hunt Permit  
PROPOSAL # 50.

Greg Svendsen

907-345-1461



907-465-6094

Attn: Board of Game Comments  
Alaska Department of Fish & Game  
Boards Support Section

To the Board of Game regarding Proposal 232. Controlled Use Areas.

My name is NJ Gates. I live near MM 229 on the Parks Highway, and I would like to go on record as opposing Proposal 232. I spend at least 8 months of the year recreating in the 17b easement to the Yanert on skis, bike, and on foot.

Proposal 232 would change the level of use in a long standing Controlled Use Area that has been in effect for decades. Besides introducing new levels of impact which would only serve to bring the same impacts realized in the Rex and Ferry Trails areas, there would also be safety concerns for those of us who do live and recreate here. The proposal itself is vague, inaccurate, and not restrictive enough to prevent problems. It also leaves a sour taste in my mouth that this is an Interior Proposal being offered at a non-interior meeting. The place for this proposal is at an Interior BOG meeting if it is proposed at all.

Proposal 232 does not address many of the access issues that would surface if this area is opened up. These include and are not limited to:

- A sole 17b easement from the Parks Highway to the state lands in question
- Absence of a safe Highway trailhead for vehicles and trailers
- Absence of any means of trash pickup in the area
- The potential for destruction of habitat by use of more and larger vehicles to carry supplies in and haul out the one or two moose that may live up there
- The destruction of the fragile tundra and taiga habitat in the upper reaches of the creeks where said moose are likely to be in winter (Fish & Game surveys have already indicated this area has a low density of moose)
- Increased motorized use means increased potential for avalanche accidents as people venture further into the backcountry

The proposal also suggests that access will be from October through December with "mostly snowmachines". There are many no-snow years when I can still bike in October and even November on bare ground. Snow-machines will be replaced by ATVs or OHVs if vehicles are not restricted in any way which means more severe damage to the habitat and ecosystem. And, if folks from Fairbanks think they will come down this way and avoid open water problems, they are naïve. The Yanert and all its drainages are known for their unpredictability and ever-present overflow that will mire vehicles down for hours if not days.

Lastly, I would offer up to hunters that prefer a wilderness hunt for themselves and guide-outfitters that provide this same experience for their clients: Do you want motorized vehicles in one of the few areas left where you can have a true wilderness hunt?

Thank you for your time,

NJ Gates  
PO Box 43  
Denali Park, AK 99755



Alaska Board of Game  
Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811-5526  
FAX: 907-465-6094

Comment to the board of game

Dear Alaska Board of Game,

Thank you for the opportunity to comment on Proposal 232. To me this proposal is vague, inaccurate, and not restrictive enough to prevent problems. I am a hunter and recreational user of the Yanert controlled use area but most of all I am a resident. This Proposal makes a fundamental change in a long standing Controlled Use Area that has been in effect longer than my residency of 26 years. As I read the proposal, I have found no consideration for the new level of impacts or safety issues that will occur. This important decision is flying under the radar of many people who live, recreate and hunt in the area and should have the opportunity to comment at an interior board of game meeting first. This Proposal requires vetting in a wide arena and not simply in the context of intensive management needs.

Many problems concerning access in the Yanert already exist with the non-motorized hunts. These include but are not limited to: 1) a sole 17 b easement from the Parks Highway to the state lands in question 2) absence of a safe highway trailhead for vehicles and trailers 3) inconsiderate uses such as trash and waste management, access across private lands without permission and absence of any system to control habitat destruction around fragile tundra/taiga habitats.

The proposal does not address any of the above and has the potential to increase vehicles and trailers awkwardly backed into the highway ditches, ramped up onto power line right of ways, encroaching on private driveways, and increase the destruction of sensitive habitat by use of larger vehicles not only along trail routes but also in the upper reaches of drainages most likely used by moose. Winter safety concerns should also be considered such as the avalanche potential in the upland areas that require crossing to access moose habitat.

The Proposal suggests that access will be from October through December with "mostly snowmachines." However October and November are transition months, often snowless (as witnessed by dog mushers in the area having to use 4 wheelers for training). ATVs or OHVs will use the Yanert if not restricted. Their impacts are potentially more severe and require a higher level of monitoring. In addition, thaws are frequent in the winter, and adequacy of snow for snowmachines is variable.

The use of the drainages in the Yanert CUA will not avoid the problems of open water encountered in other parts of 20A. The Yanert is traditionally a very unstable river with periodic overflow throughout the winter making travel unpredictable. This is also true of Revine, Moose Creek, and Slime Creek. No matter the form of travel, the drainages in the Yanert CUA are no more reliable for early freeze up than those drainages around the Rex, Ferry or GoldKing areas.

The Proposal's suggestion that it will mitigate impacts in the Rex, Ferry, and GoldKing areas by spreading them to yet another region is fundamentally flawed - there is no proof that spreading the impacts will produce any meaningful reduction of those same impacts in any of the areas. It is more likely to simply spread and increase the already existing impacts to a new area. This new impact is not justified simply by its alleged but unproved benefit for intensive management.

Again thank you for the opportunity to comment. Until further assessment, please pull this proposal from consideration at the upcoming March Alaska Board of Game meeting.

Clare Curtis, Denali Park, AK



February 15, 2011  
Dianne L. Herman  
General Delivery  
Cantwell, AK 99729

Alaska Dept of Fish and Game:

I am writing in regards to Proposal 232, in Unit 20A, Zone 7---my home trails. This is also known as the Yanert controlled use area, which is under the jurisdiction of the Mid Nenana advisory committee.

It is my understanding that the Fairbanks advisory committee is trying to change the usage of this area, in order to open it up for non-local hunters during the fall and early winter season, for moose... Moose??? What moose? I mush, hike, and skijor these trails daily, September---April, and rarely see a moose. In fact, I have seen one yearling moose since September, twice, the same moose. These trails are used daily by locals who live here, mothers with young children on skis, hikers, old folks on snow-shoes, skijorers, mushers, and local snowmachiners, who drive slowly, as they know they are likely to encounter a non-motorized user. Most of us secure trail permits from AHTNA, in order to cross their land to the state land further out. The trails were made and are maintained by locals, mainly mushers, who have spent many hours cutting brush and otherwise maintaining the trails. Locals live here for the fabulous, non-motorized trails, so they can enjoy being out in the QUIET wilderness.

Allowing Fairbanks hunters to use our trail system would severely endanger the non-motorized users, and wreck the trails. We usually don't get sufficient snow here until late November, and the ruts caused by ATV's would further corrode the trails, as to make them unusable for skiers and mushers in the winter. Furthermore, there is no right of way, except by the (now-closed by AHTNA) gravel pit, where there is no parking, and the hunters that already come in October (often with horses) make a mess of the roadside, leaving feces and garbage strewn along the highway. More hunters would further damage the side of the road (there is no pull-out at all), as well as endanger passing traffic. I'm sure that some hunters would choose to pass through AHTNA and other private property, which would raise trespassing issues. I could understand this better, if there were a lot of moose here, but zone 7 has the lowest concentration of moose of any area in the state!

In conclusion, I would like to remind you that this proposal is out of your normal cycle; this is the year for proposals for the south and southwest regions of the state, not for the interior. Also, this was not a proposal put forth by the mid-Nenana advisory committee. If this were to be proposed, it would be only considerate of you to let the public in the area know, by holding public meetings and inviting public comment.

Thank you for your prompt attention to this matter.

Sincerely,



February 18, 2011

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section

To the Board of Game regarding Proposal 232. Controlled Use Areas.

Please do not allow any motorized vehicle access in the Yanert Controlled Use Area in Unit 20.

I am a resident who lives at MP 229 on the Parks Highway and as an avid skier and novice snowmachiner, I regularly use the trails in the Yanert Controlled Use Area in Unit 20. Opening this area to motorized vehicle use after Sept. 30 will be a huge detriment to the area. The only 17(b) access exists at MP 228 and I can attest that this area is already a congested mess during hunting season with vehicles and trailers vying for parking along the highway and regularly getting stuck, with local citizens often being called upon to assist. There are NO facilities or a proper pullout at this easement access. The trash that collects along the highway during the hunting season is an eyesore (luckily we have concerned local residents who regularly clean it up) and human waste along the roadway and trail is a problem and health hazard as there is no place for hunters to "go" while staging before and after their hunting trips. Including motorized access is going to increase the pressure and problems already faced at this poor public access to the Yanert. I believe the impacts will be as significant, if not worse, than those on the Ferry and Rex trails.

Safety is a huge issue with the opening of this area to motorized use. The Yanert is renown for being an unstable river with many areas of overflow that change yearly, seasonally and unexpectedly. Avalanche danger is prevalent in many of the valleys, a threat to unsuspecting snowmachiners. There are many drainages that flow into the Yanert, all of which have terrible overflow problems as well. We have only a volunteer fire department and volunteer emergency rescue team in the area, making rescues limited and dangerous for all involved.

Although the proposal suggests that "mostly snowmachiners" will access the area, there is typically little to no snow in October. ATV's and ORV's will be used instead if they are not restricted. These vehicles will destroy much of the exposed, shrubby, moist tundra habitat in the upper reaches of the creeks where moose are likely to be found. Past surveys conducted by F&G show this area has a very low density of moose. I do not believe the impact on habitat by motorized vehicles can justify the limited numbers of moose that may increase harvest quotas, set by Intensive Game Management mandates.

It is disturbing that this proposal is being offered out of cycle by a non-interior committee that does not represent the local community. If this Proposal is going to be made it should *only* be considered during a year when Interior Proposals are considered.

Thank you for considering the non motorized recreational values of this area for residents and hunters who appreciate their sport (and craft) on foot and by pack horse. Safety and a lack of resources for rescue are a primary concern as is the extremely poor access available to this area. Many other concerns are prevalent – there is much that needs to be considered before opening the Yanert Controlled Use Area in Unit 20 to motorized vehicles. Please do not hesitate to contact me for additional comments or clarifications. Thank you for your time and interest in this matter.

Sincerely,



Jodi Rodwell  
PO Box 123  
Denali Park. AK 99755



February 18, 2011

**From:** Bill Rodwell  
**To:** Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
**Re:** Proposal 232. Controlled Use Areas

I live near mile 229 of the Parks Highway and I am opposed to motorized hunting access in the Yanert Controlled Use Area in Unit 20. As an area resident and recreational user of this area, I have communicated with the wide variety of user groups including hunters, hikers, skiers, bikers, dog mushers and recreational snow machiners. My communication with these groups indicate that the overwhelming desire is to not allow motorized vehicles for hunting. Typically, I access this area as a skier and occasionally as a recreational snow machiner.

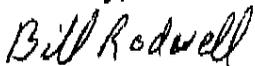
By keeping this area closed to motorized hunting, the impact to the quality wilderness surroundings and to other user groups can be minimized. Although our community has witnessed inconsideration by hunters, the majority of hunters who make the non-motorized effort to visit this area seem to take pride in leaving less of a trace on the wilderness and on other user groups. I cannot say the same about other areas in the state where motorized hunter's vehicles and larger camping footprints have left big impacts on the land and leave other users discouraged and seeking other locations to recreate.

The challenging terrain in this area and the means by which a heavily loaded motorized user works around that challenging terrain can have severe impacts on the trails and the surrounding wilderness. There are also problems associated with limited parking and access to this area.

On behalf of all current user groups, I encourage you to expend efforts to identify alternative motorized hunting areas or further manage existing motorized hunting areas to reduce impact and meet demands. This area is of high natural resource value. An occasional non motorized hunter, a motorized trapper, or recreational snow machiner passing through an area does not equate to the impacts that motorized hunting will bring.

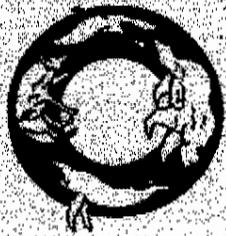
Thank you for considering the essence of what the majority of user groups in this area have to say in regards to minimizing conflicts and impact in this area.

Sincerely,



Bill Rodwell  
P.O. Box 123  
Denali Park, AK 99755





# THE ALASKA WILDLIFE ALLIANCE

"LETTING NATURE RUN WILD"

February 18, 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, Wasilla, Central/Southwest Region March 4-10

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 30 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 comments.

First, we want to say that we support and agree with the comments submitted by Defenders of Wildlife. Having said that, we want to provide comments on a few proposals that were not mentioned by Defenders, or which we want to especially emphasize.

**Proposal 23. Oppose.** This proposal would implement a predator control program on Unimak Island. The AWA strongly opposes predator control on Unimak Island.

**Proposal 72. Support.** This proposal would close a portion of the Palmer Hay Flats to Trapping. We think this proposal is excellent in pointing out that there is significant recreational use of portions of the Palmer Hay flats, during



trapping season, and we strongly believe that large conibear traps, snares, and leghold traps pose an unacceptable danger and conflict with the use of these lands by people, and their pets. I, Kneeland Taylor, the undersigned, have ice skated on the Palmer Hay Flats and have seen quite a few other ice skaters out there skating, with their dogs, children, etc. I don't during trapping season take my dog into areas where there is trapping, and most pet owners who are aware that traps are present, do the same. By allowing trapping the Board of Game is effectively closing large areas during trapping season to many of Alaska's citizens. It is a matter of a fair balance between different groups of citizens, and we should all be treated with respect.

**Proposal 77. Oppose.** Predation Control in Unit 16, Brown Bears. The snaring of bears, the killing of sows with cubs, and other measures proposed are practices that the majority of Alaskans, hunters and non-hunters, find cruel, unethical, and disgusting. We are appalled that an advisory committee should propose such practices, especially for brown bears.

**Proposal 78. Support.** Predation Control: Remove bears from intensive management. The National Parks Conservation Association has written an excellent proposal. Not only do we agree that the Legislature never intended to authorize the slaughter of bears solely to increase moose and caribou numbers, we point out that most Alaskans hold the killing of sows with cubs and snaring to be cruel, unethical, and outside Alaska's hunting tradition.

**Proposal 101. Support.** Reduce Seasons and Bag Limit for Wolf. There are many people who would like to see more wolves in Unit 16A, not less. Current regulations seem to be aimed at eliminating wolves entirely from Unit 16A for no good reason.

**Proposal 103. Oppose.** Predation Control: Unit 16. The AWA has long opposed the killing of predators for no reason other than to attempt to maintain unrealistically high, stable, populations of moose and caribou. Proposal 103 is more of the same misguided, mismanagement of wildlife which in the long run will negatively impact Alaska's wonderful wildlife heritage. Furthermore, the proposal authorizes practices such as the taking of sows with cubs, and bear snaring that most Alaskans find cruel, unethical, and beneath the standards of our state.



Proposal 106. **Oppose.** Trapping-Bears. The AWA opposes the trapping or snaring of bears. Most Alaskans find the practice cruel, unethical, and beneath the standards of our state.

Proposals 111-113. **Oppose.** No season or limit for coyotes. Coyotes are not vermin and should not be treated as such. Most Alaskans and our constitution support responsible management. These proposals are irresponsible.

Proposals 115 & 116. **Oppose.** Dall Sheep. Full curl only proposals. 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 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, or favors to residents, or favors to guides by crafting regulations that allow lots of people to go hunting but minimizing the chances of success by allowing hunters to take only a few full curl animals.

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, 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.

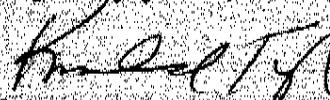
Proposal 194. **Support.** Sea Ducks and Waterfowl. See above.

Proposals 216-220. **Support.** 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.

Very truly yours,



The Alaska Wildlife Alliance

By Kneeland Taylor, Board Member



Mail comments to:  
**Attn: Board of Game Comments**  
**Alaska Department of Fish & Game**  
**Boards Support Section**  
**PO Box 115526**  
**Juneau, AK 99811-5526**

Fax to:  
**907-465-6094**  
**Attn: Board of Game Comments**  
**Alaska Department of Fish & Game**  
**Boards Support Section**

**To the Board of Game regarding Proposal 232, Yanert Controlled Use Area**

**My name is Ty Fulmer and I live at mile post 221 on the parks highway. I have been a resident for 5 years in this area. Hunting has been something that I have enjoyed most of my life. I grew up in Michigan and enjoyed deer hunting. Ever since I have lived here I have gone out hinting for moose or caribou.**

**I hunted my first year out the stampede. I found it highly discouraging as no matter how much I hiked I was always running into a four wheeler. It was greatly discouraging. Ever since then I have hunted in the Yanert Controlled Use Area, or up off the Haul road in unit 26. There is something that adds to the hunting experience having to hike through the land listening to the landscape and not hearing a putting noise of a machine.**

**If you open the Yanert area to motorized hunting it is going to greatly affect my hunting success. There is already to many people out in that area. It is hard enough trying to find a legal moose in area that already sees to much hinting pressure. If you allow machines in it will push the game further and further out making it harder for people who are going in without horses or machines.**

**There is not much land out there off the highway system that is non motorized hunting. If you allow easy access to more and more people there becomes less and less of a wilderness experience. The unit has people in most of the drainages. It is hard enough having a good wilderness experience during the hunting season with all the air traffic flying hunters in and out. There is atleast 50 horses out on the yanert during the hunting season. You are bound to run into people already.**

**I spend most of my free time out in the mountains in this unit. I have to say there is plenty of habitat for the animals. However there isn't as much game out there as people think. I go long periods of time without seeing moose or moose sign. The woods and mountains around here are not a easy place to ride a snowmachine or four wheeler. There is not any major trails wich would mean people getting stuck or lost. There is already lots of injury on the rex and stampede trails and those areas are a lot easier to run a snowmachine or four wheeler.**



**I hope to be able to continue to have a place out the back yard that is not over run like the rex or stampede trails. As soon as you make it easy for people to go out in the mountains its going to become over run. People are always trying to make hunting easier. Hunting is supposed to be a lot of hard work. Please don't make it easy for lazy reckless people to come here and trash this piece of paradise. Thank you for your time.**

Ty Fulmer

Box Holder PO 345  
Denali Park, AK  
99755



February 18, 2011

As a 40+ year resident of Alaska who values equal hunting rights for all, I strongly  
OPPOSE prop. 50.

Leonard E. Jewkes  
1891 Blackburn Way  
North Pole, Ak. 99705



February 18, 2011

As a 38+ year resident of Alaska who values equal hunting rights for all, I strongly  
OPPOSE prop. 50.

John Denton   
7209 Richardson Hwy  
Salcha, Ak. 99714



February 18, 2011

As 40+ year residents of Alaska who values equal hunting rights for all, we both  
OPPOSE prop. 50.

Michelle and Mark Leonard *m+mf*  
P.O. Box 70503  
Fairbanks, Ak. 99707



February 18, 2011

As a 40+ year resident of Alaska who values equal hunting rights for all, I strongly  
OPPOSE prop. 50.

Diane E. Jewkes  
1891 Blackburn Way  
North Pole, Ak. 99705



February 15, 2011

**Proposal 232 - 5 AAC 92.540(H)(ii). Controlled Use Areas.** Allow motorized vehicle access in the Yanert Controlled Use Area in Unit 20.

**Opposed**

1. **Parking:** There is already congestion along the highway from trucks and trailers during hunting season. Our driveway entrance has been blocked on occasion and sometimes we come home to find vehicles parked down our driveway (well out of any state right-of-way). With absolutely no public parking anywhere near the sole 17b easement from the Parks Highway to the state lands in question, I can only imagine that this problem will increase if the area is opened to motorized hunting.

2. **Impact:** Allowing motorized vehicles for hunting would increase the human impact on the area. This includes damage to the landscape and increased amounts of trash left behind.

Eric and Susanna Nancarrow  
PO Box 197  
Denali Park AK 99755



2/16/11

RE: proposal #50

TO: ADF+G  
Boards Section

The Community hunt Idea is a  
Bad one, please don't do  
this. All Alaskans are  
constitutionally entitled to  
The same hunting opportunities.

Thank you for your consideration.

Jim Sackett  
Fairbanks



ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811-5526  
Fax: 907-465-6094

I would like to take this opportunity to comment on the following proposals:

Proposal #6

Support this proposal. The moose and caribou populations are depressed. Where there was once thousands of caribou there is not even a hunting season (9E) Allowing resident hunters to harvest brown bears one per year will help decrease the bear population and subsequently promote an increase in the moose and caribou population.

Proposal #8

Oppose this proposal. Until the SAP caribou herd has attained levels to sustain a hunting harvest, no hunting should be allowed.

Proposal #12

Oppose this proposal. Registration permits should be available at all Alaska Fish and Game offices statewide. They should not be limited to specific offices. This allows all Alaskans an equal opportunity to obtain a registration permit.

Proposal #13

Oppose this proposal. Registration permits should be available at all Alaska Fish and Game offices statewide. They should not be limited to specific offices. This allows all Alaskans an equal opportunity to obtain a registration permit.

Proposal #14

Support this proposal as amended. Make all nonresident hunting by drawing permit. This will allow the Department of Fish and Game to monitor the potential harvest of moose by nonresident hunters, thereby increasing the availability of moose for resident hunters if necessary by decreasing the number of permits available to nonresident hunters.

Proposal #15

Oppose this proposal . Proposal #14 as amended above will be sufficient.



Proposal #16

Support this proposal. In times of depressed moose populations, nonresident hunting should not be allowed.

Proposal #17

Oppose this proposal. Nonresident hunting for moose in this area should be either eliminated or by drawing permit. The moose population is not high enough to support all of the hunters. Restrictions should be placed on the nonresidents.

Proposal #25

Oppose this proposal. The limit should be one bear per year.

Proposal #26

Oppose this proposal. There are decreased moose and caribou populations in this area and plenty of brown bears. We should not restrict the brown bear hunting, so hopefully we can increase the moose and caribou population.

Proposal #29

Oppose this proposal. We should never change the salvage requirements for DLP bears anywhere in the State of Alaska. It is important for reporting purposes to help the biologists gather data related to the bear populations.

Proposal #30

Support this proposal. The caribou populations are depressed. Nonresident hunting should be eliminated until the population reached a size that will support a sustainable harvest.

Proposal #31

Oppose this proposal. The caribou population has not reached a size that will support a sustainable harvest. Until that time nonresident hunting should be eliminated in that area.

Proposal #32

Oppose this proposal. The caribou population has not reached a size that will support a sustainable harvest. Until that time nonresident hunting should be eliminated in that area.

Proposal #33

Oppose this proposal. People should be able to look at the calendar and determine when they need to be at the Fish and Game office to obtain a permit. If they cannot figure that out, how can we trust them to be out in the field.



Proposal #34

Support this proposal as amended. Instead of a registration hunt for nonresidents, make it a drawing permit for nonresidents if the area is going to be opened at all to nonresident hunting.

Proposal #35

Oppose this proposal. The moose populations are not high enough at this time to support an open hunt for nonresidents. If any hunting by nonresidents is allowed it should be by drawing permit only.

Proposal #37

Support this proposal. Registration hunt permits should be available at all Alaska Department of Fish and Game offices statewide. They should not be restricted to certain areas.

Proposal #40

Oppose this proposal. The current bag limits and hunting season for brown bears in Unit 13 is fine. In some areas moose populations are still depressed. The continuation of the current hunting seasons and bag limits will help to increase the moose and caribou populations.

Proposal #41

Oppose this proposal. How would someone be able to define and justify that they are black bear hunting and a brown bear just happened to come along versus actively hunting brown bears over a bait station.

Proposal #42

Support this proposal. Most of unit 13 should be open to resident caribou hunting via a drawing permit. There is sufficient hunting opportunity for subsistence hunters via the federal subsistence hunting areas in Unit 13.

Proposal #43

Oppose this proposal. If people are going to be automatically given a Unit 13 Tier I permit simply by applying then we need to continue the hunting restrictions to no other areas in the State of Alaska to hunt moose and caribou, otherwise everyone will apply for a Tier I permit.

Proposal #44

Support this proposal. Most of unit 13 should be open to resident caribou hunting via a drawing permit. There is sufficient hunting opportunity for subsistence hunters via the federal subsistence hunting areas in Unit 13.

Proposal #45

Oppose this proposal. Primarily because it includes establishing an archery only hunt. I am not opposed to an archery only hunt in the portion identified, it is just that it should not be included with the proposal to change the subsistence areas and making unit 13 a drawing permit.



Proposal #47

Oppose this proposal. It eliminates the hunt requirements if you obtain a Tier I permit, thus allowing you to hunt anywhere in the state. Additionally, it establishes a point system which I am opposed to as it creates an unnecessary amount of work for the Department of Fish and Game to manage.

Proposal #48.

Support this proposal. The Community Harvest hunt should be eliminated. This creates discrimination among Alaskan residents.

Proposal #50

Support as amended. Eliminate all wording and reference to Community Harvest Permits. The hunt area should be subsistence or general drawing permit.

Proposal #51

Support this proposal. Increasing the legal limit for dall sheep to a full curl allows the younger rams to become more mature. It will also promote a better hunting experience through being only able to harvest more mature rams.

Proposal #54

Oppose this proposal. If sealing of sheep horns is to be changed then it should be changed for all areas of the state. The arguments promoted apply equally to all other sheep hunting areas in the state.

Proposal #56

Oppose this proposal. The moose season is liberal enough as it is at this time. It does not need to be expanded.

Proposal #57

Support this proposal. The moose population is not sufficient to support all of the resident hunters. Until such time as the population increases to a sufficient level, nonresident hunting should be stopped.

Proposal #59

Oppose this proposal. The antler restrictions for the early season hunt were not the same as the regular season hunt in some areas. (3brow tine vs 4 brow tine) If the goal is to increase the bull harvest then the brow tine requirements should be the same.

Proposal #61

Oppose. There should be antler restrictions on these hunts the same as for other moose hunts in unit 13. Not having antler restrictions allows the harvesting of less mature bull moose which decreases the number of bulls that will reach the breeding age maturity.



Proposal #62

Oppose. This proposal does not include antler restrictions for the harvesting of moose. The antler restrictions should be the same for this hunt as any other hunt in unit 13

Proposal #63

Oppose this proposal. Generally speaking the moose will be in active rut about the end of September. Allowing hunting at that time could be disruptive to the breeding process. Additionally, the current moose season is sufficient and does not need to be expanded.

Proposal #64

Support this proposal. Last year ADF&G had an early season hunt that changed the antler restrictions from the usual 4 brow tine to 3, but the regular season was 4 brow tines. If there are sufficient moose to have an emergency opening for 3 brow tine moose then the general harvest antler restrictions should be changed to 3 brow tines.

Proposal #67

Support this proposal. It is definitely much more customary and traditional to take your children (or entire family) hunting – to teach them and share with them, than it is to have a few people do all of the killing under the guise of Community Harvest.

Proposal #68

Oppose this proposal. This is just a guise to change the scoring to benefit rural residents moreso than people that have a longstanding traditional and customary use of the resource.

Proposal #69

Oppose this proposal. The restrictions in the Clearwater Creek Controlled Use Area were in effect prior to the current owners purchasing the property. They should have done their homework prior to purchasing the property and then they would have known the regulations and could have made adjustments so that they or their clients would be in compliance with the regulations. Exceptions to the regulations should not be made to benefit a small number of individuals.

Proposal #70

Support this proposal. ATVs use continues to increase and new trails are popping up all over the area. This is to the detriment of the vegetation and is beginning to impact the resource as well as the quality of the hunt for many people.

Proposal #74

Oppose this proposal. Two bait stations for the guide is sufficient.



Proposal #76

Support this proposal. There is currently a high population of brown bears in Unit 16. Evidence of this exists in that this past year there were numerous cabins broken into by bears. We have had a cabin in Unit 16 since 1996 and this is the first year that we have had a bear break into our cabin. Some other individuals had bears break into their cabin more than once this past fall.

Proposal #77

Support this proposal. The bear population in Unit 16 is high and the moose population is depressed.

Proposal #78

Oppose this proposal. The brown bear population in Unit 16 is very high. The population needs to be decreased. This is evidenced by numerous breakins of cabins by bears.

Proposal #94

Oppose this proposal. If there is a surplus of moose open up a winter registration hunt for residents prior to opening up the area to nonresident hunters. This would allow resident hunters who were unsuccessful during the fall hunting season to have an opportunity to harvest a moose during the winter season.

Proposal 101:

Oppose this proposal. There are depressed moose populations in that area at this time. Wolves contribute to this low population. Wolf hunting should be no closed season until the moose population rebounds.

Proposal 109:

Oppose this proposal. There are an abundance of grizzly bears in these areas. By not having a bear tag fee it will increase the opportunity for individuals who were not necessarily hunting grizzly bears to harvest a bear if the opportunity arises. They may not have purchased a tag because they were not intending to hunt bears, however if they see one while hunting other game they will have the opportunity to pursue that animal.

Proposal 110:

Support this proposal. I agree with the information presented in the proposal.

Proposal 115:

Support this proposal. The sheep population in this area is declining. Any area with fewer than 10 permits should be resident only.

Proposal 116:

Support this proposal. All sheep hunting in the state should be limited to full curl rams or rams greater than 8 years of age.



Proposal 117:

Oppose this proposal. Bowhunters have plenty of opportunity to hunt sheep during the regular season. This season is long enough to support all hunters.

Proposal 122:

Support this proposal as amended. All requirements for any registration hunt can be met at any Department of Fish and Game Office. This will prevent the requirement that someone would need to incur the cost of travel to some remote town or village to attend an orientation class that is held a month prior to the hunting season for the animal they wish to hunt.

Proposal 133:

Support this proposal. The sheep population in this area is declining. Any permit hunts with fewer than 10 permits should be for Alaska residents only. Only full curl rams or larger should be allowed to be harvested. This would allow younger rams to reach breeding maturity and contribute to the gene pool.

Proposal 134:

Support this proposal. There are not very many permits issued for this area so they should be reserved for Alaska residents.

Proposal 140:

Support this proposal. Allowing hunting of the wolves in this area may contribute to making the wolves more wary of humans. This may help to decrease the wolf – human interactions that have become dangerous in the past couple of years.

Proposal 147:

Oppose this proposal. There is ample opportunity for a bowhunter to hunt elk during the regular season. There are not that many hunters in the field during the season.

Proposal 148:

Oppose this proposal. There is ample opportunity during the regular hunting seasons for anyone with a muzzleloader or bow to hunt goats on Kodiak island. They do not need a special season.

Proposal 153:

Support this proposal. The brown bear population is high. The moose population is low. The brown bears kill moose calves. There are numerous brown bear – human interactions that may be reduced with increased bear hunting opportunities.

Proposal 161:

Support this proposal. I believe all moose antlers should be sealed. I believe there are numerous sublegal bull moose killed every year by people who are too quick to shoot rather than identify their target first. This may help decrease the number of sublegal moose killed each year.



Proposal 178:

Oppose this proposal. Controlled use areas should remain as is. People should understand the rules for these areas before they hunt in them. Having to pack out the moose is part of the deal for hunting in a controlled use area that does not allow motorized vehicles. They can pack in an electric fence to put around their moose meat.

Proposal 183:

Oppose this proposal. There should not be discrimination to allow one group of people to use motorized vehicles and not allow others to have the same accessibility. Leave the area as a controlled use area.

Proposal 190:

Support this proposal. I agree with the information presented in the proposal.

Proposal 204:

Oppose this proposal. Community harvests should not be allowed.

Proposal 215:

Oppose this proposal. I am against the utilization of any preference point system for distribution of permits. Prior to using preference points, the elimination of nonresident hunters for a species should be utilized to ease hunting pressure.

Proposal 222:

Support this proposal. Proxy hunters should not be allowed to retain antlers that have not been destroyed. This will help to prevent proxy hunting for trophy animals.

Draft – Alaska Board of Game. Game Management Unit 13 of Caribou and Moose.

I disagree with much of this policy. There is a lot of tradition and passing along of hunting lore from generation to generation of the “nonrural” people who utilize this resource. One of the major difficulties is that the “nonrural” people do not get a chance to hunt this resource every year. The majority of the resource has been allocated to the “rural” subsistence hunter, even though they live on the road system and have access to stores to purchase their food.

Proposal 225:

Oppose this proposal. There is ample opportunity to hunt this resource during the regular hunting season. There does not need to be a special season for bowhunters.

Proposal 227:

Support this proposal. All registration hunt permits should be available to all Alaska residents at any Fish and Game office.



Proposal 229:

Support this proposal. There is a high moose population in the Anchorage area. There are many moose – motor vehicle accidents that could be decreased by harvesting more of the moose in the area.



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



To Alaska Board of Game Comments  
Alaska Dept of Fish and Game

Boards support Section  
PO Box 115526  
Juneau Ak., 99811- 5526

Dear Boards Support Section

My name is Michael Speaks. I live at Deneki Lakes , mile 227 Parks Highway and would like to go on record as completely against the current proposal to change the regs re: the area of The Yanert River and its non motorized access rules.

I have lived here since 1981 and have seen all the fluctuating populations of moose, bear, caribou and wolves etc. Currently the local population of moose is down, esp. on the heels of this years any bull permits that were issued. The moose are not here this winter!

And why in the heck doesn't the state see the real way to help hunters and bring back the winter caribou season. There are plenty of caribou around every winter and they are close enough to the road/trail system to be available to hunters on foot, skis are with dog support, eliminating the need and paperwork to change anything. And caribou are of a size manageable to hunters on foot.

And as far as ease the pressure on Rex and Ferry, well thats no excuse at all. If the Yanert were open to ATVs and snow machines, a huge amount of traffic from the Denali Highway would come here, so that in effect, even if you did ease pressure to the north, it would compound it to an unacceptable level here. There is no where to park so most hunters would be in direct violation of any DOT rules about highway right of way. And there is the always uncooperative local native corp surrounding all access routes. What do they say?

The creeks and rivers here are notoriously with overflow and ice problems for the unprepared. And the local population here is never going to agree with this and so you just wind up pissing every local off. That's not very good politics.

So please don't make this mistake and leave one place where someone whom wants the real and true experience of using pack animals or solo, stealth hunting can occur.

The particular piece of trail that accesses across Ahtna will be so chewed up by ATVs as to unusable by dog teams and skiers during this cycle of low snow years.

Use good sense and bring back winter caribou season and no motorized vehicles, ever!

thanks for your time.

regards

Michael Speaks; 30 year local resident





# National Park Service

**National Park Service  
240 West 5<sup>th</sup> Avenue  
Anchorage, AK 99501  
907-644-3510 (office)  
907-644-3816 (fax)**

FACSIMILE

Date: Feb 18, 2011  
To: Cliff Judkins, BOG Chairman  
From: Regional Director  
Pages to Follow: 6  
Fax Number: 907-465-6094

Comments:





**United States Department of the Interior**  
**NATIONAL PARK SERVICE**

Alaska Region  
240 West 5<sup>th</sup> Avenue, Room 114  
Anchorage, Alaska 99501

IN REPLY REFER TO:  
L30(AKRO-SUBS)

**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.

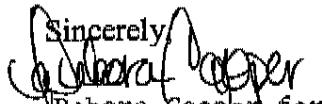


Another situation where there is value in the Department retaining its discretion can be seen in the brown bear subsistence hunt in northwestern Alaska. The Department points this out in their Preliminary Recommendations to the Board on page 58.

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



2/14/11

CLEM CLOOTEN  
1163 LINNOR LOW LANE  
FRANKS, AK  
99712

I OPPOSE CHP,  
PROPOSAL #50

THANK YOU,

Clem Clooten



Cynthia Domaruk Merrow  
PO Box 176  
Denali Park, AK 99755

February 12, 2011

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

To whom it may concern,

I am writing in response to the proposal to open the Yanert Controlled Use Area in Unit 20A to motorized use after September 30. I live in this area at mile 224.5 on the Parks Hwy. I have hunted locally for both moose and caribou and strongly oppose this proposal.

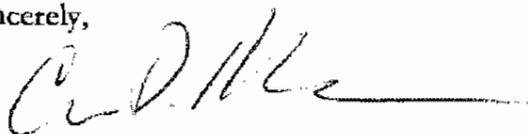
I spend a lot of time snow machining, skiing, hiking, and camping in this area, including many week long trips during both the winter and summer seasons. It is a rare day when I see a moose or even moose sign. This area is not known for a high density of moose. The increased permits in the non-motorized hunt last year greatly confused and concerned me. This decision did not seem to be based on actual numbers of moose. I am worried about what this has already done to the future moose population in this area.

The increased number of hunters that appeared this fall was deeply concerning to me. A large number of cars, trucks, and trailers were haphazardly strewn off the highway halfway in the ditch for several weeks. When they finally left, the area was trashed. There was not only evidence of overuse of the trails and access area, but a considerable amount of trash and waste was left behind. I shudder to think of the damage that would occur if this area was opened longer for hunting and available to motorized use.

The Yanert CUA does not provide a good alternative to the existing areas used for motorized hunting. During the fall, limited four wheeler access due to the many creeks and rivers would concentrate the use into small areas. During the winter, open water and regular overflow make snow machine access difficult.

I am all for sustainable hunting. There are many areas in Alaska where motorized hunting access makes sense. The Yanert CUA is not one of them. Thank you for your time and thoughtful consideration.

Sincerely,



Cynthia Domaruk Merrow



Robert D. Menow  
PO Box 176  
Denali Park, AK 99755

February 14, 2011

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

Dear Board of Game members,

It has come to my attention that a proposal is being considered that would open the Yanert Controlled Use Area to motorized vehicles after September 30<sup>th</sup>, for the antler less moose hunt. I believe my comments deserve your attention because: 1) I am a local resident residing at Mile 224.5 Parks Highway and will be disproportionately affected by any negative effects of this proposed change, 2) I am a hunter and have hunted the area in question for both moose and caribou, and hope to be able to harvest animals from this area in the future, and 3) I have flown extensively over Unit 20A via helicopter in the course of my employment as a helicopter manager with Alaska Fire Service, and this coupled with the fact that I have hunted, hiked, and skied, and snow machined in the Yanert CUA on a nearly daily basis for several years during the fall and winter allow me to speak with some authority regarding game populations. I am opposed to the proposed opening of the Yanert CUA for several reasons which I will address individually.

Let me begin with what I feel is the most important reason why this proposal is a bad idea. I do not believe that game populations support this change. As I stated before, I have flown extensively in this area, mostly at or below 500' AGL and at airspeeds of less than 100 knots. Moose densities in the Tanana flats are higher than I have observed elsewhere in the state, with the exception of Minto flats. While I am not suggesting I have seen moose populations everywhere in the state, I have flown 200-300 hours a summer since 2003 and seen a significant portion of the state. The proposal under consideration suggests that too much focus has been placed on harvest along the Rex trail, Ferry trail, and in the Goldking area. I disagree with this contention. Simply put, this is where the moose are and a motorized antlerless hunt makes sense there. As I also stated before, I spend a significant amount of time during the fall and winter months hiking, skiing, and traveling by snow machine in the Yanert CUA. In sharp contrast to the Tanana flats, moose sightings here are rare. This is not where the moose are concentrated, at least not in high enough numbers to justify increased hunting pressure.

Secondly, opportunities for motorized hunting abound elsewhere in the state. A quick glance at the GMU map reveals that the Yanert CUA is a small portion of Unit 20A. I believe it is important that non-motorized hunting opportunities continue to exist. Non-motorized hunts offer an entirely different experience that the motorized circus that descends on places like the Denali Highway. Important to consider also is the presence of essentially one legal access point for proposed motorized vehicle traffic into the Yanert CUA, a BLM easement across Ahtna land with no trailhead facilities. By no facilities I mean just that, no lodges, no parking, no trash receptacles, and no bathrooms. One need only look at the trailhead overcrowding here caused by the dramatic increase in "any bull" tags issued this past season. The trailhead area was overrun and there was a corresponding increase in refuse and "paper flowers" left behind by irresponsible parties. Rather than eliminating overcrowding and negative social aspects of the hunt, this proposal will merely shift those same problems to another trailhead.

Thirdly, while the proposal implies that motor vehicle traffic will be primarily snow machine, a September



30 opening would result in primarily four wheeler access. During most years, this area lacks the snow require for snow machine access until late December. That access to much of the Yanert CUA requires travel on frozen waterways reveals another flaw in the proposal. Four wheelers would be confined essentially to the roadside, creating an overcrowding situation. It is also suggested that winter travel in this area is absent the hazard of open water and river crossings. My experience here suggests exactly the opposite. Open water is always a hazard, often in the form of overflow and dangerous "snow machine swallowing" shelf ice.

In conclusion, there are numerous reason why the Yanert CUA should remain a non-motorized hunting area. Primary among these is that current game populations don't justify the change. Moose population density is high in the areas where motorized hunting is already permitted and significantly lower in the Yanert CUA. This combined with a recent history of overcrowding conditions at local trailheads and a corresponding increase in litter and human waste suggest that increased hunting pressure will result in a diminished hunting experience for all involved and a lack of game. Thank you for your service and thank you for taking my comments into consideration. I urge you to continue making game management decisions based on sound science and protecting our wildlife for future generations of Alaskans.

Sincerely,



Robert D. Merrow





## National Parks Conservation Association®

Protecting Our National Parks for Future Generations®

Alaska Regional Office . 750 W. 2nd Avenue . Suite 205 . Anchorage, AK 99501  
 (907) 277.6722 . FAX 907.277.6723 . www.npca.org

February 18, 2011

Cliff Judkins  
 Chair  
 Alaska Board of Game  
 P.O. Box 115526  
 1255 W. 8th Street  
 Juneau, AK 99811-5526

RECEIVED  
 FEB 18 2011  
 BOARDS  
 ANCHORAGE

Attn: Scott  
 Public Comment  
 BOG Central SW

Re: March 2011 Board of Game supporting proposals #26, #40, #78 and #109

Dear Chairman Judkins,

Wildlife is one of America's great resources. Nowhere is wildlife more protected and encouraged to exist in a natural condition than in our national parks – especially here in Alaska. Unfortunately on national preserve lands, the National Parks Conservation Association (NPCA)<sup>1</sup> has recognized a disturbing trend in the state of Alaska's management of predators, especially wolves and bears that runs counter to sustaining natural conditions. This trend favors liberalizing sport hunting harvest methods and means, as well as liberalizing seasons and bag limits, to promote an increased take of wolves and bears with an anticipated result in higher populations of moose, caribou and other wildlife for the purpose of human consumption.

While the state can implement its Intensive Management strategy to place human consumption as the top priority for wildlife use on its own land, the state's Intensive Management and Maximum Sustained Yield mandate directly conflicts with National Park Management Policies that disallow the manipulation of one wildlife population to benefit the population of another, hunted, species<sup>2</sup>. Furthermore, state lands bordering National Parks and Preserves in Alaska are critical to the long term ecological health of National Park Service managed wildlife populations. A level of cooperation must occur between the state and the federal government to effectively manage wildlife on an ecosystem or landscape scale. The need for such management strategies and cooperation is widely recognized in scientific literature and in the 1982 Master Memorandum of Understanding.

<sup>1</sup> The National Parks Conservation Association (NPCA) is America's only private nonprofit advocacy organization dedicated solely to protecting, preserving, and enhancing the U.S. National Park System. Founded in 1919, NPCA has more than 340,000 members of which 1,000 reside in Alaska.

<sup>2</sup> Management Policies at 4.4.2 "The Service does not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species (i.e., predator control), nor does the Service permit others to do so on lands managed by the National Park Service."



## A Review of Federal Legal Mandates

Wildlife's importance to our park system is embodied in the 1916 National Park Organic Act that includes in the purpose of the park system the direction to

“...conserve the scenery and the natural and historic objects and the wild life therein...”

Protecting and preserving wildlife is reinforced in the Alaska National Interest Lands Conservation Act of 1980 (ANILCA) which states in Section 101(b):

“It is the intent of Congress in this Act to... provide for the maintenance of sound populations of, and habitat for, wildlife species of inestimable value to the citizens of Alaska and the Nation, including those species dependent on vast relatively undeveloped areas;”

Providing for wildlife populations and habitat in Alaska's parks is further defined in Section 815 (1) with specific language directing that national parks and monuments will be managed to sustain “*natural and healthy*” wildlife populations and national preserves managed to sustain “*healthy*” populations.

And specific ANILCA language designating Lake Clark clearly supports wildlife protection as a primary park purpose:

“and to protect habitat for and populations of fish and wildlife including but not limited to caribou, Dall sheep, brown/grizzly bears, bald eagles, and peregrine falcons”

Maintaining healthy wildlife populations, however, does not preclude the Park Service from providing for both sport and subsistence hunting opportunities in national preserves, as directed by Congress in ANILCA Section 203<sup>3</sup>. Yet hunting in national preserves is allowed only when it is consistent with other purposes of the park system as set forth in ANILCA Section 1313:

“A National Preserve in Alaska shall be administered and managed as a unit of the National Park System **in the same manner as a national park** except as otherwise provided in this Act and except that the taking of fish and wildlife for sport purposes and subsistence uses, and trapping shall be allowed in a national preserve **under applicable State and Federal law and regulation.**”

---

<sup>3</sup> “That hunting shall be permitted in areas designated as national preserves under the provisions of this Act.”



The key words here are "administered and managed as a unit of the National Park System in the same manner as a national park... under applicable State and Federal law and regulation." ANILCA makes it clear that, while Alaska has some unique provisions, its parks are to be treated like other units of the park system across the country. Management direction for the national park system in Alaska is firmly grounded in the 1916 Organic Act as reinforced in ANILCA Section 203<sup>4</sup>. How Park Superintendents are to manage park wildlife pursuant to the Organic Act is found in the National Park Service Management Policies.

Management Policy 4.4.3 clearly sets out where the harvest of wildlife is allowed:

*Where harvesting is allowed and subject to NPS control, the Service will allow harvesting only when (1) the monitoring requirement contained in section 4.4.2 and the criteria in section 4.4.2.1 above have been met, and (2) the Service has determined that the harvesting will not unacceptably impact park resources or natural processes, including the natural distributions, densities, age-class distributions, and behavior of:*

- *Harvested species*
- *Native species that the harvested species use for any purpose, or*
- *Native species that use the harvested species for any purpose*

Section 4.4.2.1 (mentioned above) explains that:

"removal (of plants and animals) will not cause unacceptable impacts on native resources, natural processes, or other park resources"

And furthermore, Section 4.4.2 makes it abundantly clear that the manipulation of wildlife populations is not allowed:

The Service does not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species (i.e., predator control), nor does the Service permit others to do so on lands managed by the National Park Service.

In summary, preserves in Alaska are bound to the Organic Act as well as to ANILCA and they are managed under the same Management Policies as parks in the Lower 48. Direction in ANILCA, the Management Policies, and from the Secretary's Office make it clear that while harvesting wildlife in national preserves can occur, it cannot deplete healthy populations or unacceptably impact natural processes, natural distributions, densities, age-class distributions and behaviors, and harvest cannot be done for the purpose of increasing the numbers of harvested species (i.e. predator control).

<sup>4</sup> "the Secretary shall administer the lands, waters, and interests therein added to existing areas or established by the foregoing sections of this title as new areas of the National Park System, pursuant to the provisions of the Act of August 25, 1916 (39 Stat. 535), as amended and supplemented"



## Alaska Hunting Regulations Must Be Non-Conflicting with Federal Legal Mandates

NPS management direction for implementing the legal mandates of the Organic Act and ANILCA for harvesting wildlife in National Preserves in Alaska is found in 36 CFR 13.40(d) which states:

“Hunting and trapping are allowed in national preserves in accordance with applicable Federal **or non-conflicting state law and regulations**”  
(emphasis added).

In managing hunting on national preserves, we are confident that the National Park Service fully understands that its mission is to protect healthy wildlife populations in accordance with the direction set forth in ANILCA, the Organic Act, the Management Policies, DOI direction and other applicable laws and regulations, **as reviewed above. As such**, when the state of Alaska proposes new hunting laws or regulations for Game Management Units (GMU) that include all or portions of national preserves, the standard by which the Park Service evaluates these proposed new laws and/or regulations is one of “non-conflicting” with the Management Policies, ANILCA or the Organic Act as amended and supplemented.

To ensure that there is no conflict, the Management Policies call for consultation with states on harvest policy. In Section 4.4.2,

the policy calls on the Service to consult with state agencies on certain fish and wildlife management actions and encourages the execution of memoranda of understanding as appropriate to ensure the conduct of programs that meet mutual objectives as long as they do not conflict with federal law or regulation.

Key words in this policy are “mutual objectives” that “do not conflict with federal law or regulation.” Under the terms of the existing Management of Understanding between the NPS and the State of Alaska, we believe the Park Service has attempted to ensure that mutual objectives are met by submitting timely and detailed comments on proposed regulation changes to the Alaska Board of Game. However when the state of Alaska does not live up to its side of the agreement by ignoring Park Service protests over proposed new hunting regulations that **do conflict** with federal law or regulations, the Park Service is forced to take action within its own regulatory regime, creating confusion for the hunter while doing what it must to protect park resources.

NPCA supports all requests by the Park Service to modify proposals and/or exempt NPS lands from proposed new hunting regulations.



## Comments On Specific Proposals

ADF&G's 2009 Brown Bear Management Report is still unpublished as of February, 2011<sup>5</sup> and ADF&G's online brown bear harvest data is missing for Unit 17B post 2006.<sup>6</sup>

The lack of public dissemination of current brown bear harvest data significantly limits thorough and effective participation in the Board of Game process by NPCA, federal land managers, and other members of the interested public. When ADF&G does not provide thorough and current harvest, management, and research data in its analysis of NPCA's concerns and ignores specific concerns, the department analysis should not be considered sufficient to support a recommendation to the board regarding NPCA proposals.

### Support Proposal 26 – Unit 17 Adjustments to Brown Bear Harvest Regulations

NPCA strongly urges the Board of Game to support amending the non-resident brown bear harvest regulations, in this case the season length, in subunit 17B to align more closely with bordering Unit 9. This is a conservative proposal that continues to provide nonresident hunting opportunity while retaining the current resident harvest opportunity. The goal is to encourage the dispersal, instead of the concentration, of brown bear harvest throughout the region. This proposal is a conservative attempt to address; 1) concerns of a concentrated harvest of brown bears along the upper Mulchatna drainage, especially during season dates when bordering GMU's are closed to bear hunting, 2) to simplify the regulations for the hunting community, and 3) to manage the brown bear populations on NPS managed lands conservatively due to the lack of objective brown bear management data. Yet we fear the Board may disregard our proposal because of the negative analysis done by ADF&G.

In ADF&G's analysis and recommendation for Proposal 26, the department makes an ambiguous and unsupported claim that "most" of the harvest "data" presented by the NPCA is incorrect - yet the department provides no data analysis of its own to support that claim or address the NPCA concerns presented in the proposal.

The department avoids addressing NPCA's specific concerns; including high documented rates of female brown bear harvest in subunit 17B following board liberalization of brown bear harvest regulations in 2003 and subsequent years.

The department recommendation of "Do Not Adopt" is supported only by subjective "assumptions" that the current harvest rates are sustainable and the brown bear population is "healthy". Phrases such as "likely" and "subjective" are used in the analysis and fail to provide detailed analysis using sound scientific principles, including a detailed discussion of the potential impacts to the composition of the brown bear population resulting from targeted or concentrated harvest of mature brown bears in subunit 17B. Sound science presented by ADF&G is needed to justify continuing excessive and liberal harvest regulations of NPS managed wildlife resources, including those that rely on seasonal migrations to bordering state lands for food sources. This science is missing from this discussion.

<sup>5</sup> <http://www.adfg.alaska.gov/index.cfm?adfg=librarycollections.wildlifemanagement>

<sup>6</sup> <https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvest.lookup>



In support of this proposal, NPCA relied on the latest data provided for in specific state documents:

- In 2003 the Board of Game significantly liberalized the brown bear harvest regulations in Unit 17B.<sup>7</sup> This action resulted in three consecutive years of female brown bear harvests exceeding 50% of the total harvest of brown bears in Unit 17B (RY 03/04 – RY 05/06), a maximum harvest rate established by ADF&G for female brown bears in Unit 17B.<sup>8</sup> Yet the female harvest rate could be even higher. In 2007 ADF&G states that the sex ratio for all brown bears killed in 17B is unknown.<sup>9</sup>

ADF&G did not provide any data to indicate that the percentage of female harvest rates in 17B have decreased since 2006 in their recommendations and analysis of the NPCA proposal.

- Following the high female harvest rates, the Board of Game subsequently liberalized brown bear harvest regulations again in 2005 and in 2009 in subunit 17B.<sup>10</sup>
- In 2007, ADF&G states the brown bear harvest rate had doubled (in 17A, B, & C) from the historical harvest rate.<sup>11</sup>
- Defense of life & property (DLP) and subsistence harvest of brown bear is chronically under reported in Unit 17 and in the region in general. The actual total harvest of brown bears in subunit 17B is unknown.<sup>12</sup>

<sup>7</sup> 2005 Brown Bear Management Report pg. 171 /

[http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt\\_rpts/05brbweb.pdf](http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt_rpts/05brbweb.pdf)

From one bear every four years to one bear every year and extended the season by 10 days, only in the upper Mulchatna river drainage bordering the park.

<sup>8</sup> 2007 Brown Bear Management Report pg. 183 /

[http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt\\_rpts/07\\_brbear.pdf](http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt_rpts/07_brbear.pdf)

<sup>9</sup> 2007 Brown Bear Management Report pg. 179 /

[http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt\\_rpts/07\\_brbear.pdf](http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt_rpts/07_brbear.pdf) / The ADF&G state: “the sex ratio for all bears killed (reported plus unreported) in the unit is unknown”

<sup>10</sup> RY 04/05 and RY 08/09 Hunting Regulations Booklet:

In 2005 the BOG extended the season by 10 days in the remainder of 17B. In 2009 the BOG extended the season by another 10 days for all of 17B, including the upper Mulchatna River and including NPS managed lands.

In bordering Unit 9, the ADF&G established a maximum harvest rate objective for female brown bears of only 40%. A 50% female harvest objective in 17B is the upper limit for an estimated sustainable harvest rate of female brown bears. For the state harvest rates to exceed this objective three years in a row and the BOG to then continue to liberalize harvest opportunities in 17B is not acceptable. These actions do not comply with established scientific management principles.

<sup>11</sup> 2007 Brown Bear Management Report pg. 179 /

[http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt\\_rpts/07\\_brbear.pdf](http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt_rpts/07_brbear.pdf)

<sup>12</sup> 2007 Brown Bear Management Report pg. 179 /

[http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt\\_rpts/07\\_brbear.pdf](http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt_rpts/07_brbear.pdf)

“Changing the intolerant attitude of local residents toward bears is a significant challenge”

Page 115: In Unit 9 which borders Unit 17 the ADF&G estimated an unreported, illegal/DLP yearly harvest of 50 brown bears. Yet, ADF&G seems to avoid estimating what they readily admit is a high unreported / illegal harvest in Unit 17.

- From 2001 to 2006, 62% of the bears killed in Unit 17 were from subunit 17B bordering NPS managed lands.<sup>13</sup>

In its analysis, ADF&G did not address the regulation changes since 2003 that promoted increased harvest pressure on brown bears in Unit 17B. ADF&G provided no analysis for aligning brown bear hunting regulations with bordering GMU's, a policy the BOG traditionally supports statewide.

“Prior to 1970, few bears were reported as harvested in the Unit [17A, B, & C]. When the Board of Game established alternate year seasons in [bordering] Unit 9 in 1973, the number of bears reported harvested in Unit 17 increased.”<sup>14</sup>

Detailed harvest rates for bears on state lands defined by unified coding units (UCU's) bordering Lake Clark National Park and Preserve were not provided by ADF&G in its analysis or evaluation of the potential impacts of a concentrated harvest along the upper Mulchatna River drainage. Relying exclusively on brown bear harvest rates inside the park does not provide an accurate assessment of the potential cumulative and long term impacts to NPS managed brown bear populations, especially when it is highly probable that traditional brown bear feeding areas lie outside the park boundaries along the upper Mulchatna River drainage and unnatural low populations of bears on bordering state lands may promote source-sink emigration of bears out of the park.

In addition, the potential for undocumented negative impacts to NPS bear populations increases significantly when the states management data is subjective and based solely on harvest rates and harvest composition statistics.

“Harvest statistics are useful, but a manager cannot expect to gain a confident appraisal of population status solely from the sex and age composition of the harvest”<sup>15</sup>

<sup>13</sup> 2007 Brown Bear Management Report pg. 183 /

[http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt\\_rpts/07\\_brbear.pdf](http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt_rpts/07_brbear.pdf)

On page 179 of the report also states:

“It is unknown if the unequal distribution of harvest in the Unit is due to bear distribution or hunter effort. “

“Subjective evidence indicates the population is large enough to support such harvest”

<sup>14</sup> 2001 Brown Bear Management Report pg. 165 /

[http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt\\_rpts/mbr01\\_sc.pdf](http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt_rpts/mbr01_sc.pdf)

2007 Brown Bear Management Report pg. 164 /

[http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt\\_rpts/07\\_brbear.pdf](http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt_rpts/07_brbear.pdf)

ADF&G acknowledges that large male bears are particularly susceptible to harvest during den emergence in March and April. Alternating years with spring hunts is an effective measure for mitigating that vulnerability.

<sup>15</sup> 2007 Brown Bear Management Report pg. 115 /

[http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt\\_rpts/07\\_brbear.pdf](http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt_rpts/07_brbear.pdf)

“Harvest statistics are useful, but a manager cannot expect to gain a confident appraisal of population status solely from the sex and age composition of the harvest”

Müller, Sterling D., Sellers, Richard A., Keay, Jeffrey A. Effects of Hunting on Brown Bear Cub Survival and Litter Size in Alaska. *Ursus* 14(2):130-152 (2003)



NPCA does recognize a typo found in its proposal. The total harvest rate from RY 00/01 to RY 05/06 included all of Unit 17 in the original proposal. The correct harvest rate data for just 17B is as follows (in bold):

From Regulatory Year (RY) 92/93 to RY 99/00 the average brown bear harvest in only subunit 17B was 37 bears per year (range 22 – 55). From RY 00/01 to RY 05/06 the average bear harvest in Unit 17B increased to **63 bears per year (range 48 – 77)**, an overall increase of **71 percent** in just six years.

An alternating fall / spring brown bear hunt is available in bordering subunit 9B for non-residents. We relied on the state of Alaska's 2010 / 2011 hunting regulation book which states "no open season" in the season dates column for non-residents. On further investigation, we found the fine print indicating a non-resident season actually does exist and located the dates for the seasons in a preceding year regulation book. We regret any confusion this caused, but would point out that we relied on data published in the official State of Alaska Hunting Regulation publication.

### **In Conclusion:**

The current subunit 17B brown bear harvest regulations are incompatible with NPS goals, objectives and management plan for Lake Clark, in particular to maintain the natural population age class composition and the "unimpaired" ecological integrity of brown bears in Lake Clark National Park and Preserve. NPCA bases this assertion on the following:

- a lack of any objective data for the brown bear population specific to Unit 17;
- the significant limitations identified by ADF&G of a brown bear management strategy based exclusively on harvest objectives and harvest composition ratios;
- the targeted harvest of the mature age class of the brown bear population;
- a significant increase in overall brown bear harvest rates compared to historical rates, including female harvest rates exceeding the management objective for at least three years since 2003;
- and multiple objections by the National Park Service regarding the actions of the Board of Game authorizing liberal brown bear harvest regulations in 17B since 2003;

NPS management mandates are to conserve the natural diversity of the brown bear population inhabiting park lands in subunit 17B, including the natural mature age class composition ratio. ANILCA specifically states Lake Clark National Park & Preserve shall be managed "to maintain unimpaired the scenic beauty and quality of portions of the Alaska Range and the Aleutian Range ... in their natural state and to protect habitat for and populations of fish and wildlife including ... brown/grizzly bears." Adopting this proposal will provide NPS with an improved opportunity to meet its legal mandates.

### **Support Proposal 40 – Amending Unit 13 Brown Bear Harvest Regulations**

Brown bear harvest in Unit 13 is the most liberal in the state of Alaska and it impacts hunting in both Denali and Wrangell-St. Elias national parks and preserves. NPCA proposed changes to both the bag limit and the season length to reduce the hunting impact on brown bears in Unit 13. While



ADF&G recommended a “do not adopt,” we feel that ADF&G’s analysis is insufficient to address NPCA concerns and does not justify the “do not adopt” recommendation.

In the ADF&G analysis of proposal 40, the department continues to avoid addressing virtually every concern presented by NPCA and it makes unsubstantiated claims to address those concerns.

NPCA’s principal concerns that ADF&G’s analysis did not address are:

- ADF&G states in their analysis of proposal 40 that recent increases in moose calf recruitment in Unit 13 is “primarily driven” by wolf control, not high rates of brown bear harvest. The Board of Game authorized the current brown bear harvest regulations for the sole and exclusive purpose of reducing the brown bear population in Unit 13 to “potentially” increase moose calf survival.

*“Brown bear numbers should be reduced to increase moose calf survival ... The rationale behind these liberalized seasons, bag limits, and tag fee eliminations are that they increase the interest in hunting brown bears.”<sup>16</sup>*

- Despite increased harvest rates for brown bears since the 1980’s, the department admits in its analysis that “the effect on moose is still unclear”<sup>17</sup> and the state continues to promote unprecedented liberal brown bear harvest regulations in Unit 13.
- NPCA has concerns about the decline in multi-year brown bear harvest rates despite increasingly liberalized brown bear harvest regulations. ADF&G quotes a single year harvest rate of 158 bears in RY 08/09 yet provide no indication of the yearly trend since 2006. Since 2001 the multiyear trend has documented a falling harvest rate despite the BOG promoting “opportunistic” harvest by any hunter in the field who simply “encounters” a bear while hunting other species, including a “no closed season” on harvest. This is a direct indication that the optimum yield of brown bears has been negatively impacted. ADF&G strongly objected to liberalized brown bear harvest regulations just a decade ago, yet the analysis of proposal 40 suggests that the state is conducting a unit wide “experiment” of that liberalization. This does not comply with management objectives for federally managed wildlife populations in Unit 13. Nor does it explain or justify the reasoning for the dramatic shift in ADF&G policy in the last decade.

*“If grizzly bear numbers are reduced below optimum yield to promote population growth in a prey species, such cases will be kept to a minimum, continued for the shortest possible time, and restricted to the smallest area necessary to accomplish the goal.”*

<sup>16</sup> 2001 Brown Bear Management Report Unit 13 / pg 139

[http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt\\_rpts/mbr01\\_sc.pdf](http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt_rpts/mbr01_sc.pdf)

<sup>17</sup> Department of Fish and Game Analysis and Recommendations for proposal 40 / March 2011 BOG Meeting



*"These recommendations set a standard for conservative management of brown/grizzly bears over most of the state, with relatively few exceptions in specific areas where increased bear harvests would reduce predation on stressed moose or caribou populations."*<sup>18</sup>

- Unit wide moose population and harvest objectives are currently being met in GMU 13. This is not a "stressed" population. Unfortunately, ADF&G does not provide any current moose harvest data to support the statement of a need for "continuing toward" moose objectives. One obvious management example that moose management objectives have been met or exceeded is found in the 2011 Unit 13 moose harvest regulations which provides up to 290 any bull permits for residents and up to 115 any bull permits for non residents only. These regulations imply that bull cow ratios have been reached or exceeded in much of Unit 13.
- ADF&G analysis of proposal 40 states that the current unprecedented harvest rate is sustainable. Yet the department admits in the analysis that a basic unit wide brown bear population survey or census of the bear population is not available, admitting that only 8% of Unit 13 has some "undisclosed" amount of objective data, yet even then, the department does not provide any of the data for review. Unit wide brown bear populations are based on modeling "estimates" only and those estimates have inherent limitations as described by the area biologist.

*"A major problem pertaining to brown bear management is the difficulty in obtaining population data ... Because of this; population data are available for only a limited portion of Unit 13. All unit wide bear estimates are based on extrapolations of estimated densities. The problems associated with this are obvious, particularly given the differences in study area and census techniques"*<sup>19</sup>

ADF&G's claim of a "healthy" bear population in Unit 13 is an unsubstantiated claim with little objective data provided to support that assertion for public review.

- AD&G's analysis states that the source-sink dynamic between NPS managed bear populations both within and bordering Unit 13 "appears" to be localized and long distance migrations do not occur. Yet ADF&G provides nothing in the form of specific data to support that assertion or to refute the substantial number of peer reviewed papers on the topic.<sup>20</sup> In addition, the ongoing research project in subunit 13A borders Wrangell St. Elias National Park and Preserve, thus short distance migration to fill unnatural low bear population levels on bordering state lands in 13A is a significant and valid concern. ADF&G's analysis of a source-sink dynamic

<sup>18</sup> Appendix A / Oct. 1998 ADF&G report to the BOG - RESIDENT BROWN BEAR BAG LIMITS AND TAG FEES

<sup>19</sup> 2007 Brown Bear Management Report pg. 80/

[http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt\\_rpts/07\\_brbear.pdf](http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/mgt_rpts/07_brbear.pdf)

<sup>20</sup> Schwartz CC, Haroldson MA, White GC, Harris RB, Cherry S, Keating KA, Moody D, Servheen C. 2006. Temporal, spatial, and environmental influences on the demographics of grizzly bears in the Greater Yellowstone Ecosystem, Wildlife Monographs 161. Pg. 57

[http://www.fws.gov/mountain-prairie/species/mammals/grizzly/Schwartz\\_et\\_al\\_2006a.pdf](http://www.fws.gov/mountain-prairie/species/mammals/grizzly/Schwartz_et_al_2006a.pdf)



regarding NPS managed bear populations in Unit 13 is insufficient and based on subjective analysis of limited data that is not provided for public review.

- ADF&G's analysis provides no data on high harvest rates on lands bordering Denali and Wrangell St. Elias National Park and Preserve's in Unit 13. No harvest data based on unified coding units (UCU's) is provided to address NPCA concerns of concentrated harvest of brown bears along park borders and high access areas bordering parks and preserves in Unit 13.

### **In Conclusion:**

ADF&G's analysis of proposal 40 states the "true effects" of liberalized seasons are unknown and that continuing the liberal regulations and harvest rates "will enhance our knowledge of brown bear population dynamics statewide". NPCA questions the quality of information gained by this "experiment" when compared to the risk of long term damage to the diversity and integrity of the larger landscape and its relevance to other regions of the state.

The state of Alaska is over-stepping its authority by subjecting NPS managed wildlife populations to an unprecedented and unjustified management "experiment" conducted for the sole purpose of artificially reducing bear populations to increase ungulate populations for human consumption, especially when the "experiment" is unit wide, includes wildlife that predominately inhabits NPS managed lands, and the data collection for scientific analysis is limited in scope and withheld from public review in the ADF&G analysis of proposal 40.

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### **Proposal 78 – Revoke the Intensive Management of Bears in 5AAC 92.125**

At the October 2010 meeting of the Board of Game, board member Ben Grusendorf stated legislative intent for the state's Intensive Management statutes (AS 16.05.255 (e-g)) clearly identified in committee in debate that bears would not be included in the state's "intensive management" programs. The department states that "predation by bears" must be considered but fails to identify if that consideration "may" include the identification of bears in 5AAC 92.125. Again, the ADF&G analysis lacks specific reference to Alaska statute "requiring" the board of game to identify bears in 5AAC 92.125.

ADF&G's analysis indicates that establishing board testimony regarding this issue is inappropriate and does not request regulatory change. This could not be further from the truth. Identifying historical legislative and board discussion on the requested regulatory change found in proposal 78 is necessary for NPCA to support its requested regulatory action.

In addition, NPCA asks the Board of Game to request a formal opinion from the Department of Law regarding legislative intent to exclude all bears from all intensive management plans authorized under the authority of AS 16.05.255(e-g).



AS 44.23.020.(d) states:

“There is established within the Department of Law the function of public advocacy for regulatory affairs.”

The public is seeking a formal legal opinion of the legislative intent, the resident’s intent, when authorizing the intensive management of game in Alaska in 1994. This is a basic and fundamental request for the Department of Law to participate in public advocacy for regulatory affairs.

### **Support Proposal 109 – Amend Unit 11, 13 & 16 Brown Bear Tag Revocation**

The revocation of the need for a tag to harvest brown bears was done simply to increase the opportunistic harvest of brown bears in furtherance of the state’s desire to reduce bear populations for the benefit of human consumption of moose and caribou. Consistent with our other proposals seeking a reduction in the harvest of brown bears, we seek a reinstatement of the brown bear tag.

The department’s analysis of proposal 109 states the tag fee exemption of brown bears is applied to game management units with known calf predation. Yet the ADF&G analysis of proposal 40 states that “the effect [of liberalized brown bear hunting regulations] on moose is still unclear.” Resident brown bear tag fees were revoked 16 years ago in Unit 13, yet the effect on moose calf recruitment is still unclear.

In ADF&G’s generated proposal 110, the department justifies reauthorizing the brown bear tag fee exemption based on one issue, increasing brown bear harvest rates resulting in a “potential” decrease in bear predation on moose calves. Yet no data or analysis is provided that increased harvest rates are sustainable or that increased harvest rates result in lower predation rates on moose calves. No objective scientific justification is provided.

ADF&G’s analysis of proposal 109 also states that “Current [brown bear] population estimates and related research conducted in Units 13 and 16B indicate that brown bears are an effective predator and currently present in healthy numbers. The department ignores Unit 11 and provides no moose calf mortality data or population data for public review. No objective scientific justification is provided.

ADF&G appears unable to address or justify the dramatic shift from its long standing brown bear management policy of using liberal regulations designed to reduce the bear population only sparingly and in short duration. Long term artificial manipulation of bear densities and age class composition in bear populations over broad areas presents significant risk to the long term diversity and integrity of the environment on a landscape scale. ADF&G’s analysis did not address the departments own recommendations over the last several decades.

*“If grizzly bear numbers are reduced below optimum yield to promote population growth in a prey species, such cases will be kept to a minimum, continued for the shortest possible time, and restricted to the smallest area necessary to accomplish the goal.”*



*"The Department lacks adequate information on brown/grizzly population numbers in most areas of the state to manage harvest intensively on an annual basis. Because of the difficulty and high costs of estimating bear density, it is unlikely the Department will be able to gather such information on a wide scale in the foreseeable future."*

*"Thus the Department relies heavily on accurate harvest information to assess effects of hunting and will continue to do so. The Board has previously recognized that inconsistent regulations can provide incentives for hunters to misrepresent locations of their kills. Inaccurate reporting in units with longer seasons, tag fee waivers, and/or 1 bear/year limits has been documented and can cause biologists to misinterpret trends in sex ratio and mean age used to assess population status." <sup>21</sup>*

ADF&G has not addressed the question of why Denali State Park and NPS lands in Unit 20E are excluded from brown bear tag revocations yet national park and preserve lands in Unit 11, 13 and 16B (bordering Denali State Park) are not. This is especially troublesome when you consider that Unit 11 is virtually all NPS managed lands and Denali National Park and Preserve, which borders Denali State Park, is widely considered one America's most treasured National Parks.

#### **In Conclusion:**

The National Park Service has requested in writing to the Board of game that NPS managed lands be excluded from every "no brown bear tag fee required" regulations a total of four times since 2003, two of those requests were specifically for unit 11, 13, 16B.

The National Parks Conservation Association feels there are no alternatives to the wise management of Alaska's bear populations. Management principles based on recognized scientific brown bear management principles leave the board no choice but to reinstate the brown bear tag fees on National Park Service managed lands.

Thank you for the opportunity to comment on these proposals.

Sincerely,

*for M. Blair*

Jim Stratton  
Alaska and Pacific NW Regional Director  
National Parks Conservation Association  
750 W. 2nd Ave. #205  
Anchorage, AK 99501

<sup>21</sup> Appendix A / Oct. 1998 ADF&G report to the BOG - RESIDENT BROWN BEAR BAG LIMITS AND TAG FEES



# Appendix A

## RESIDENT BROWN BEAR BAG LIMITS AND TAG FEES

REPORT TO THE BOARD OF GAME  
October 23, 1998

### BACKGROUND

A statewide bag limit of 1 brown/grizzly bear every 4 years was first established by the Board of Game (Board) in 1967. In 1976 the Alaska State Legislature mandated a \$25 brown/grizzly bear tag fee for Alaska residents, but chose not to establish tag fees for other game animals harvested by residents for food. These regulations applied even in areas where permits made the frequency with which individual hunters took bears irrelevant to overall harvest. The \$25 tag fee and 1 bear every 4 years standard thus reflected an attitude in which most hunters held brown/grizzly bears in high esteem, to be harvested conservatively as part of a carefully planned hunting experience rather than incidental to other activities. A statewide requirement to salvage brown/grizzly bear hides and skulls, but with no requirement to also salvage the edible meat, further underscored the prevailing attitude that this was a trophy animal.

By the early 1980s the Board, the Department of Fish and Game (Department), and the public realized that in some areas predation by brown/grizzly bears might be a factor in declines and prolonged lows of some populations of moose and caribou important for harvest by humans. Consequently the Board began allowing hunters to take 1 bear/year in certain units in 1982. In 1983 the legislature authorized the Board to waive the resident brown/grizzly bear tag fee on a year-to-year basis in selected game management units or subunits.

In 1986 and 1987, the Board worked with the Department to establish clear guidelines for using resident tag fees and bag limits to manage brown bear populations. The Board and the Department agreed that consistency in regulations among units would best serve most statewide management goals (i.e., a baseline standard of a \$25 resident tag fee and 1 bear every 4 years). However, they also recognized situations in which it might be desirable to direct increased harvest to specific areas to relieve bear predation on moose or caribou. The following recommendations were presented to the Board at their October 1987 meeting and have served as the basis for brown/grizzly bear management since then:

- 1 When it is desirable to increase harvest of brown/grizzly bears, primary emphasis should be placed on season length extensions and not tag fee waivers and bag limit changes.



- 2 If season length changes do not result in desired harvests, bag limit changes and/or tag fee waivers should be considered on a case-by-case basis only.
- 3 When bag limits are changed to 1 bear/year or the resident tag fee is waived, additional controls such as registration hunts or in-unit sealing should be implemented.
- 4 To the extent possible, individual regulation changes should be maintained for several years. Overlapping regulatory changes confuse the assessment of any single change.
- 5 If grizzly bear numbers are reduced below optimum yield to promote population growth in a prey species, such cases will be kept to a minimum, continued for the shortest possible time, and restricted to the smallest area necessary to accomplish the goal.

Implicit in the first recommendation was an intention to apply the standard of 1 bear every 4 years and a \$25 tag fee as widely as possible, and use other methods to regulate harvest under sustained yield principles. The second recommendation reconfirmed the intention to use the 1 bear every 4 years bag limit as a baseline and make changes only on a case-by-case basis when changes in season length failed to achieve harvest goals. The third recommendation addressed findings that liberalized bag limits and tag fee waivers in limited areas led to false reporting of harvest location. The fourth recommendation recognized that regulations must be in place with no additional changes for several years to adequately evaluate their effectiveness. The fifth recommendation implied that increased bear harvests to reduce predation would be judiciously applied, infrequent, and small in scale. Collectively, the five recommendations recognized that brown/grizzly bears have low population density and low recruitment, it is very difficult and expensive to estimate population size and trend, and bears may take many years to recover from population reductions. The recommendations set a standard for conservative, trophy management of brown/grizzly bears over most of the state, with relatively few exceptions in specific areas where increased bear harvests would reduce predation on stressed moose or caribou populations.

By 1984 the Board also recognized that in some areas of the state some residents traditionally hunt brown/grizzly bears for food rather than trophies. The Board began to eliminate resident tag fees and allow 1 bear/year bag limits to make bear hunting regulations more commensurate with traditional practices and to promote better reporting of harvests by local residents in certain rural areas. These actions culminated in establishing the Western Alaska, Northwest Alaska, and Chignik Brown Bear Management Areas. In these areas resident hunters who harvest bears primarily for food may register to take 1 bear/year without a resident tag, and all edible meat must be salvaged. Hides and skulls need not be salvaged or sealed unless removed from the management area or presented for commercial tanning within the area, at which time the skin of the head and front claws must be removed



by ADF&G to destroy trophy value. Hunters wishing to pursue bears as trophies in the Brown Bear Management Areas may still do so under the \$25 tag fee and 1 bear every 4 years standard and must have the hides and skulls sealed. Overall harvest in the Management Areas is maintained within sustained yield limits.

Until 1998 a \$25 tag fee and a 1 bear every 4 years bag limit remained the standard for most recreational brown/grizzly bear hunters in most of Alaska. The only exceptions to the tag fee and 1 bear every 4 years bag limit were: 1) hunters taking bears for food in Brown Bear Management Areas, and 2) units with Board-approved management plans to increase moose or caribou populations through temporary reductions in bear populations by hunting. At its spring 1998 meeting, the Board recognized that Units 19D and 25D had lightly harvested brown/grizzly bear populations in spite of very long seasons and could support substantially higher bear harvests on a sustained yield basis. Therefore the Board decided to expand bear hunting opportunity by eliminating the resident tag fee in these units and allowing a 1 bear/year bag limit. Thus a third exception to the \$25 tag fee and 1 bear every 4 years standard—expanded hunting opportunity—was established by the Board. Extensive areas of Alaska are similar to Units 19D and 25D in having low brown/grizzly bear harvests in spite of long seasons. These areas are generally remote, have poor access, and often lack other game species to draw the attention of nonlocal resident hunters.

At its spring 1998 meeting, the Board also began to systematically implement the Intensive Game Management Act, passed by the legislature in 1995. Full implementation of intensive management, coupled with broader application of the new expanded opportunity exemption, could collectively change the nature of brown/grizzly hunting in Alaska so the traditional standard of a \$25 fee and 1 bear every 4 years would become the exception rather than the rule. The purpose of this document is to: 1) indicate for the Board what units or subunits might qualify for the expanded opportunity exemption; 2) discuss potential management problems associated with highly variable tag fee, bag limit, and sealing requirements; 3) discuss ramifications of simplifying regulations by eliminating the resident tag fee altogether and going to a 1 bear/year limit statewide; 4) discuss ramifications of eliminating the expanded opportunity exemption and retaining the \$25 tag fee and 1 bear every 4 years standard except in Brown Bear Management Areas and designated intensive management areas.

#### **EXPANDING HUNTING OPPORTUNITIES IN AREAS WHERE BROWN/GRIZZLY BEARS ARE LIGHTLY HARVESTED**

Units 17A, 19A, 21, 24, 25B, and 26A all have brown/grizzly bear populations which historically have been lightly harvested. Units 25A and 26C formerly had brown/grizzly bear harvests approaching sustained yield limits, due primarily to hunting by guided nonresident



hunters. Curbs on nonresident hunting, such as drawing permit requirements or quotas negotiated with guides by federal land managers, have reduced current harvests to much lower levels. As long as the curbs on nonresident hunting remain in place, overall harvest will likely remain low. Harvest in Unit 11 dropped substantially when brown/grizzly bear hunting was stopped on Wrangell/St. Elias National Park lands. Low moose numbers, a closed caribou season, and poor access in the portion of the unit remaining open to brown/grizzly bear hunting now result in harvests well below sustainable levels.

Resident hunters have historically shown little interest in taking brown/grizzly bears in the above areas despite long seasons. Bear hunting in most of these units is expensive, difficult, and likely to have low success rates. Liberal regulations in other areas with poor access, low density wildlife populations, and poor hunting success rates have not significantly increased harvest. For example, long brown/grizzly bear seasons, tag fee exemptions, and 1 bear/year bag limits have yet to significantly increase harvests in Unit 20D north on the Tanana River. Thus expanding brown/grizzly bear hunting opportunity in units with a long history of low harvest would likely have little effect on actual harvest, and would not compromise bear conservation goals, at least in the near future.

Some of the specific problems mentioned in the proposals which led to the expanded opportunity exemptions in Units 19D and 25D actually concerned local residents uncomfortable with purchasing tags before hunting and occasionally having both opportunities and needs to take problem bears more frequently than once every 4 years. These problems could perhaps have been dealt with under the old standard system by expanding or establishing new Brown Bear Management Areas, perhaps with specific modifications to accommodate local needs and traditions. Another option would have been to require registration permits, available from in-unit vendors, to take 1 bear/year with no resident tag required.

#### **POTENTIAL MANAGEMENT PROBLEMS ASSOCIATED WITH HIGHLY VARIABLE SEASONS, TAG FEES, AND BAG LIMITS**

The Department lacks adequate information on brown/grizzly population numbers in most areas of the state to manage harvest intensively on an annual basis. Because of the difficulty and high costs of estimating bear density, it is unlikely the Department will be able to gather such information on a wide scale in the foreseeable future. Thus the Department relies heavily on accurate harvest information to assess effects of hunting and will continue to do so. The Board has previously recognized that inconsistent regulations can provide incentives for hunters to misrepresent locations of their kills. Inaccurate reporting in units with longer seasons, tag fee waivers, and/or 1 bear/year limits has been documented and can cause biologists to misinterpret trends in sex ratio and mean age used to assess population status.

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Overestimates of harvest in units where harvest is falsely reported and underestimates in units where harvest actually takes place make it difficult to determine effectiveness of management strategies and could even put some bear populations at risk.

The Board and the Department have attempted to reduce misreporting problems by requiring in-unit sealing. This solution is viable so long as units with more liberal regulations are relatively few and isolated, becoming less useful as areas with special regulations proliferate and are intermingled with units retaining the \$25 tag fee and 1 bear every 4 years standard. In-unit sealing also becomes unwieldy in units with few or no communities with sealing agents.

A complicated mosaic of units with varying regulations also leads to confusion among hunters. Hunters commonly complain that confusion about regulations discourages them from hunting. Complicated regulations to increase hunting opportunity may be appropriate in areas where demand is high and many hunters are motivated to learn the regulations and take advantage of them. In intensive management areas where the goal is to encourage more bear harvest by hunters whose primary objective is to take other game, confusing regulations may actually be a deterrent to bear hunting or lead to unintentional violations. Tag fee and bag limit changes are already being used in various combinations to help achieve particular bear harvest goals in intensive management, subsistence, and expanded opportunity areas. The table below gives some idea of how confusing things already are:

Unit 13 (except Denali State Park) Unit 20D (east of the east bank of the Gersde River and north of the Tanana River)	No tag fee, 1 bear/year, harvest <u>does not</u> affect eligibility to hunt in areas with bag limit of 1 bear every 4 years.
Unit 19D Unit 25D	No tag fee, 1 bear/year, harvest <u>does</u> affect eligibility to hunt in areas with bag limit of 1 bear every 4 years.
Unit 6 (except 6D) Unit 12 Unit 20E	\$25 tag fee, 1 bear/year, harvest <u>does not</u> affect eligibility to hunt in areas with bag limit of 1 bear every 4 years.
Brown Bear Management Areas (all) Subsistence hunters only	No tag fee, 1 bear/year, harvest <u>does</u> affect eligibility to hunt in areas with bag limit of 1 bear every 4 years.

Special requirements for sealing hides and skulls in-unit, for sealing at designated locations outside the unit, or for sealing within 7 days of the kill rather than the standard 30 days also



apply to most of these areas. Expanding hunting opportunities in areas with historically low harvest rates, as well as full implementation of intensive management, will inevitably make things even more complicated.

#### **RAMIFICATIONS OF A STATEWIDE RESIDENT TAG FEE WAIVER AND BAG LIMIT OF 1 BROWN/GRIZZLY BEAR/YEAR**

Tag fees are not necessary for tracking harvest, which is monitored by the sealing requirement or by registration in Brown Bear Management Areas. The resident tag fee was established by the legislature and cannot be abolished by the Board, although the Board was delegated authority to waive the fees annually. Thus it appears at first glance that adopting a statewide standard of 1 brown/grizzly bear per year with no tag fee is feasible and would greatly simplify regulations and enforcement. However, additional actions would be necessary to ensure certain bear populations are not put at risk. Units 1-5, 7, 6D, 8, 9, 10, 14, 15, 20A, 22B, 22C, 22D, and 26B currently have brown/grizzly bear populations harvested at or near sustainable yield. Intensive management programs for bears are not likely in these areas, and we may not allow more liberal harvests in these units without risking reductions in bear populations. Although some of these units are already adequately protected by permit hunt regulations and would not be affected by tag fee or bag limit changes, changes in other units would have to be offset by shortening seasons or instituting permits. Resident hunters are generally opposed to permit hunts, except as a last resort. Any gains in opportunity for serious brown/grizzly bear hunters from simplifying regulations to the more liberal standard could easily be outweighed by additional constraints in already popular areas. Also, as long as dual management continues in Alaska on federal lands, liberalized state regulations could encourage even more liberal actions by federal boards. This could lead to risks of overharvest and force the state to return to more restrictive harvests or hunting closures for residents and nonresidents who are not federally-qualified subsistence hunters. We could lose ground.

Widely liberalizing brown/grizzly regulations could have other ramifications. In spite of the fact that more liberal regulations in many rural areas would likely not have much effect on actual harvest, many Alaskans continue to hold brown/grizzly bears in high esteem and question whether it would be appropriate to implement a bag limit of 1 bear/year statewide. Eliminating tag fees, liberalizing bag limits, and designating some brown/grizzly bear populations for reduction signal a major change in bear management policy and will likely trigger controversy. Bear hunting issues have been a common subject of ballot initiatives nationwide.

Brown/grizzly bear research and management is expensive. Relatively few people hunt bears compared to popular food animals like moose, deer, and caribou. The resident



brown/grizzly bear tag fee generates considerable revenue to help offset the costs of bear management. Resident tag fees brought in \$85,000 in 1997, the most recent year for which records are available. Loss of this revenue may not be easily replaced, although some would argue that it may eventually be compensated by benefits accrued from enhanced ungulate populations.

#### **RAMIFICATIONS OF RETAINING THE \$25 RESIDENT TAG FEE AND 1 BEAR EVERY 4 YEARS BAG LIMIT EXCEPT IN BROWN BEAR MANAGEMENT AREAS AND INTENSIVE MANAGEMENT UNITS**

The original purpose of the \$25 resident tag fee and 1 bear every 4 years standard was to promote conservation and quality hunting. Also implicit in these regulations was the perception that brown/grizzly bears are valued trophy animals, the harvest of which is not to be taken lightly. Many hunters and nonhunters in Alaska still adhere to those values.

The fee exemptions and 1 bear/year limits now used to address subsistence harvest and intensive management represent clearly defined and limited exceptions to the brown/grizzly bear management standards. Subsistence regulations in Brown Bear Management Areas affect few bear hunters and also recognize that some rural hunters value bears differently than most recreational hunters. Specific regulations in Brown Bear Management Areas actually formalize deeply held cultural beliefs of some residents who recognize bears as special animals, but in a different context from the trophy or aesthetic values of Western Culture. Intensive management clearly applies only when bears are seen as competitors that can and should at times be reduced for human benefit. In this context, sustained yield conservation principles that apply to most other wildlife are temporarily suspended. Bears become "special" in a negative rather than a positive sense. The Board has previously addressed this paradox by indicating that intensive management measures toward bears should be applied minimally, as stated in the fifth recommendation from the October 1987 Board meeting. Full compliance with intensive management law may require some modification of that policy, but intensive management as it applies to brown/grizzly bears can still be seen as a clear exception to conventional management policy.

Expanded opportunity offers more chances to participate in aesthetic bear hunting in a sustained yield manner. Problems arise in explaining how expanded opportunity differs substantively from intensive management when the regulations are essentially the same. Nonhunters and even hunters reading the regulations book will have trouble differentiating among areas where bears are considered too numerous for overall wildlife management goals (intensive management areas) and areas where bears are actually scarce, not harming ungulate populations, and/or where we actually do not want much in the way of increased harvest (expanded opportunity areas). Most people will not know why the regulations are in



place. They will simply notice the lack of fees, 1 bear/year bag limit, and often similar season lengths for both kinds of area. Lack of clear distinction of intensive management areas can reduce the effectiveness of purposeful bear reductions, and we may inadvertently draw hunters to the expanded opportunity areas, which is not the Board's intention.

Tag fees and conservative bag limits are widely believed to be effective in discouraging at least some hunters from opportunistically taking bears, thus reducing potential harvest. The Board still uses tag fees even in some units with bear population reduction goals to discourage harvests from increasing too quickly. Other methods such as season changes, registration, or drawing permit hunts could also ensure limitation of harvests within desired levels in the absence of resident tag fees, but many of these methods may be perceived as even less desirable than the current standards. Thus tag fees and bag limit changes can continue to be useful tools in directing and regulating harvest.

### CONCLUSIONS AND RECOMMENDATIONS

The Department recommended to the Board in 1987 that brown/grizzly bear management could best be served by adopting standard tag fee and bag limit regulations as widely as possible. There are still strong arguments for that position. Intensive management policy and subsistence needs in Brown Bear Management Areas have justified waiving resident brown/grizzly bear tag fees and allowing a bag limit of 1 bear/year in certain game management units. The Board more recently recognized the possibility for also waiving the tag fee and allowing 1 bear/year in units with chronically low harvest to allow hunters more opportunity to take bears. The question now arises whether the less restrictive regulations should replace the current standard of a \$25 resident tag fee and a bag limit of 1 bear every 4 years statewide. The less restrictive statewide standard would greatly simplify regulations. It would also reduce problems of boodegging, although varying season lengths would still provide some incentive for misreporting harvest location. However, increased intentional and/or incidental harvest of bears in some units could push harvest over sustained yield limits. Safeguarding bear populations in those units would require additional, and often unpopular, restrictions such as drawing or registration hunts and/or shorter seasons. Those additional restrictions, along with less tangible effects on public perception of the Department and the Board's attitude toward bears, could make the seemingly simple solution unpalatable.

The Board could instead decide to remain with the old status quo of a \$25 resident tag fee and 1 bear every 4 years except in Brown Bear Management Areas or intensive management areas. Those exceptions are clearly understood, and the public has accepted these conditions so far. Institutionalizing an expanded hunting opportunity exemption would certainly lead to



a more complicated mosaic of conflicting regulations and confusion for hunters and the nonhunting public alike.

Alternatively, the Board could abandon the goal of standardizing regulations and tailor more complicated regulations to the unique management requirements of individual units. This path offers the most flexibility, but it also risks ever increasing complexity as actions taken in one area inadvertently affect other areas. Public acceptance of the resulting complex regulations would require more education and explanation of the Board's intentions for each area. Increasing complexity would also require more enforcement and careful data tracking to measure effectiveness of individual regulations.

~\*~\*~\*~\*



Mark and Deborah Moderow  
P.O. Box 185  
Denali Park, AK 99755  
(907) 683-4235

February 18, 2011

RE: AK Board of Game, March 4-10, 2010, Proposal 232 Comment

Members of the Board:

My name is Mark Moderow. Our property, house and family sled dog kennel are located just off mile 228.9 of the Parks Highway, within the Yanert Controlled Use Area which is the subject of this proposal. My mailing address is P.O. Box 185, Denali Park, AK 99755.

#### Summary

I must strenuously object to Proposal 232, proposed by the Fairbanks Advisory Committee. It has been seemingly accepted by the Board of Game outside of schedule, as part of an annual reauthorization of antlerless moose hunts.<sup>1</sup> The proposal, changing a long-standing and balanced policy on motorized vehicle use in a discrete local area, cannot be accepted. The proposal has not received a complete review by the local advisory board and has not been presented with appropriate and meaningful notice and opportunity to be heard by all interested parties. The benefits and improvements advanced in support are virtually non-existent and the negative impacts are greatly understated by the out-of-area council's proposal. If the proposal has merit, the Middle Nenana Advisory Council,

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<sup>1</sup> These comments do not take a stand on the reauthorization of the antlerless hunts, which appear to be supported by my neighbors, Middle Nenana and Yanert Valley residents. This consideration, which does not change existing regulation, does not technically seem to be considered outside of schedule.



which includes representatives from the local areas affected both pro and con, is the "appropriate advisory committee"<sup>2</sup> to consider and advance the proposal. This process would allow appropriate notice, research, and opportunity for interested parties to be heard. The proposal must not be adopted.

#### Out-of-Schedule; Out-of-Area

The consideration of antlerless moose hunts is a management tool, and it is my understanding that the Board on an annual basis must reauthorize this tool. Thus, the underlying Board of Game agenda item seems to be timely. It is the addition of the alteration of a regulation implementing a long-standing and balanced policy in a discrete, local area that is out-of-schedule. By considering such matters out-of-schedule, effective fact finding by the "appropriate advisory committee", in this case is the Middle Nenana Committee, is effectively foreclosed or at least foreshortened. There is no doubt that notice as to the out-of-schedule consideration compromises notice to the general public and thus any meaningful opportunity for the interested public to aid the process before the appropriate advisory council. For these reasons, Proposal 232 should be rejected.

Proposal 232, as advanced by the Fairbanks Advisory Committee, is based upon its representations of conditions existing in the "Rex Trail", "Ferry Trail", "Gold King", and "Yanert CUA" areas. The Board must recognize and acknowledge that all of these areas lie outside of the

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<sup>2</sup> See AS 16.05.260.



immediate area where the statute presumes that the Fairbanks committee members are “well informed on the fish or game resources of the locality.”<sup>3</sup> In fact, the Board’s own regulation specifically sets up the Middle Nenana Committee as the “appropriate advisory committee” to possess such local knowledge of these areas.<sup>4</sup> It goes without saying that the appropriate committee is also in the best position to facilitate effective notice and elicit appropriate input from affected residents. This has not occurred regarding Proposal 232, and for this reason the Proposal should be rejected until such time as it is considered and advanced by the appropriate Middle Nenana Committee.

#### Overstated Benefits and Improvements

The Fairbanks Advisory Committee justification for Proposal 232 is vague as to the effects on the “quota(s)” for antlerless moose hunting. It appears to be referring to the direct effect on the intensive management quotas for the entirety of Unit 20, but in actuality it affects only the balance between the quota and the current moose population in an extremely small and discrete area of the Unit, the Yanert Controlled Use Area. Artificially increasing the quota in a small and isolated area of the Unit will not serve to enhance the original data-driven intensive management goals for the entire Unit. It is just a thinly veiled attempt by out-of-area hunters to open further areas to destructive practices without any real wildlife management data-driven benefit.

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<sup>3</sup> See AS 16.05.260.

<sup>4</sup> See 5 AAC 96.021.



A similar analysis of the access benefits advanced by the out-of-area committee demonstrates a similar lack of local knowledge. The Fairbanks Committee cites "open water" and "late-freezing" rivers along with "trail access" problems as leading to "overcrowding and concentrated hunting", in one area which would be improved by upsetting the long-standing policy on motorized vehicle use in another area, the Yanert Controlled Use Area, and transferring the effects there. The normal procedures assume the Middle Nenana Committee knows the conditions at the Rex and Ferry Parks Highway access points; the bare assertions of the Fairbanks Committee are not entitled to any similar weight. The same is true as to the relative river and trail conditions. As is discussed below, the facts relating to the limitation imposed by rivers, wetlands and terrain and the facts relating to initial access demonstrate that the claimed benefits are essentially non-existent.

In fact, the access in the Ferry and Rex areas seems superior to that in the Yanert CUA. I believe there is parking and legal easements to access the existing hunts. I have personally parked and mushed from Rex to Gold King and found the lodge owners commercially accommodating and the frozen trail adequate. By contrast, there is only one legal access to the Yanert Valley proper, at what is locally known as the Horse Trail at approximately Mile 228 of the Parks Highway. There are no recognized R.S. 2477 easements in the entire valley.<sup>5</sup> The entire highway frontage for the Yanert Valley is held in private ownership and unavailable for public access except for this access. This single access is posted against hunting and

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<sup>5</sup> See ADNR R.S. 2477 casefile on McKinley Village Trails, No. RST 1793.



parking and consists of only a limited 25 foot wide "17b" easement which is limited to use by foot, dogsled, animals, snowmobiles, 2 and 3 wheelers, and small ATVs of less than 3,000 lbs. GVW.<sup>6</sup> The size and legal limitations of this trail are in contrast to the seemingly more expansive access at Ferry and Rex.

It is also a matter of local knowledge that this trail was utterly destroyed by trespass access of heavy equipment brushing the Intertie last fall. Upon complaint by the BLM and the Regional Corporation owner, the contractors did bulldoze the remaining muck back to a uniform grade, but as the vegetation mat was compromised over large portions, it remains to be seen what length of time it will take until the trail can take motorized traffic again at any level above casual local use until total freeze up. Casual trespass trails to avoid the bottomless portions of the damaged trail are already developing. This is obviously an aspect that would fall to the expertise of the local committee for fact finding and recommendations.

In addition to trail access issues, there is no easement or area for legal parking, causing extreme congestion from trucks and horse trailers in the ditches during the existing season(s). The gravel pit owned by the Native Regional Corporation has consistently been posted against trespass and hunting and was re-opened last season for gravel extraction, leaving its future status unclear. There is simply no parking and limited legal access to the Yanert Valley proper to accommodate any additional motorized use.

The only legal access to the Yanert River from this 17b easement

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<sup>6</sup> Ahtna 17b Easement 21L leading to proposed, but not current easements 114L and 212D9 if additional Ahtna selections are approved.



occurs after the intervening Regional Corporation landholdings (and any current selections, upon conveyance) are crossed to State land, approximately 1 ½ to 3 ½ miles, and then North to the river on the local Tang Creek Trail. This trail is only a winter trail due to ponds and swamps that lie on the trail. ATV use of the Tang Creek Trail, or any attempts to bypass this trail before complete freeze-up would destroy the trail and adjacent wetlands and habitat. Locals, including myself which break and maintain the Tang Creek Trail for recreational and mushing use, do not attempt to put this trail in until the ponds and swamps are completely frozen, usually well into November or December. Hunters on foot, showshoes and skis routinely use this trail once it is frozen. Areas to the West and further up the side hills of the local mountains are well known to be avalanche prone with several local residents trapped by slides in the recent past. This is also true of the short 17b easements at Carlo and Slime Creeks, which do not access the Yanert Valley proper.

Even if the lack of legal parking and limited 17b access off the Parks Highway is accepted, and the Board is willing to ignore potential trespass access to the Yanert River or extreme habitat destruction by ATVs before complete freeze up of the Tang Creek Trail, it is obvious that the out-of-area committee does not understand the true nature of the Yanert River. It is, in fact also a "late freezing" river due to its diverse nature, at times shallow and braided and at others constricted and deep. Dramatic overflow, from the river itself and adjacent streams, keep even locals familiar with the river off it until well into the winter. Even then, rapidly changing conditions can, as happened to my wife and handler last winter,



can cause a dry river trail to turn to flowing water several feet deep in a matter of hours. The actual conditions on the Yanert River are obviously not known to the out-of-area committee and their bald assertions would not withstand the knowledge and scrutiny of the facts by the local committee after notice and due consideration.

Until well into the winter when the Yanert River is accessible by legal access and river ice conditions, the local conditions restrict motorized use by locals to areas bounded on the East by Revine and Moose Creeks. As such, if the Board were to recognize posted hunting restrictions by private landowners, the additional area accessed by motorized vehicles by Proposal 232 would consist of only 10-12 sections of land- which would be further reduced by an additional 6 sections if the land selections of the Regional Corporation were to be conveyed. It is hard to see how the addition of four to 12 sections of land to motorized use, with the associated problems, would solve "overcrowding and negative social aspects" issues in another area of the Unit.

Further, as a factual matter, while grooming the sled dog trails this last weekend, I personally met several hunters on skis who had literally covered this entire area for moose without the benefit of motorized transport. If the purpose of this out-of-schedule and out-of-area proposal is to ensure adequate hunting coverage of the accessible area, this is already being accomplished. It once again demonstrates that the out-of-area committee does not understand the actual conditions relative to the portions of the Yanert River valley accessible from the Parks Highway. The Board should recognize that their bald assertions would not withstand



scrutiny of the true facts by the local committee after notice and due consideration.

In conclusion, the quota and access benefits and improvements advanced in support of this out-of-schedule and out-of-area proposal are virtually non-existent and, as explained below, the negative impacts are greatly understated.

#### Understated negative impacts

The Fairbanks Advisory Committee's justification for Proposal 232 ignores significant negative impacts and seriously understates others. It simply ignores the creation of additional trespass issues with private property holders along the Parks highway in the Yanert Valley as well as the access and parking issues discussed above that would be created by additional uses and pressure.

Remediating destruction of wetlands on winter trails caused by even current casual recreational use of ATVs before total freeze up occupies a significant amount of my personal time. The majority of local use of ATVs and later snowmachines occurs after freeze up because of the prevalence of wetlands, ponds and lakes straddling the local trails. Many of us locally cooperate in filling holes created through the vegetation mat on the trails and maintaining trails throughout the Yanert Valley proper. The out-of-area committee does not have any knowledge of the unique local wetlands terrain issues in the valley or the limited area that can be accessed legally until total freeze up. Trespass issues, discussed above, and habitat and local trail destruction are either unknown to the out-of-area committee or



are simply ignored. Fact finding and recommendations as to these absent issues are uniquely suited for consideration by the local "appropriate" Middle Nenana Committee.

The only negative impact recognized by the out-of-area committee and contained in the proposal is to "other winter recreation... because of the need to share trails and back country with motorized vehicles." This impact is acknowledged and I agree it would present itself in the limited area available. While I must candidly state that I have rarely experienced negative interaction with local and recreational motorized users when either maintaining trails, running our sled dog teams or otherwise out in the valley, the additional snowmachine volume placed in the limited area would present an out of proportion impact. The interaction impact on the existing locally maintained trail system of ski-only trails would also be significant, as presently certain trails are utilized only by non-motorized users by tacit agreement. This is entirely consistent with the balance called for in Yanert River Management Unit 4C of the Tanana Basin Area Plan. As discussed above, however, the impact of additional ATV or ORV traffic prior to total freeze up would be devastating to the local trails of any nature.

Following brush clearing under the Intertie in the late summer, we spent significant time until well after freeze up repairing extreme damage to just the local trail system. Intervening habitat on these corridors suffered damage that will take years to recover. Spreading this type of off-road use to the entire valley before total freeze up would present an absolutely tragic impact on habitat and the local, limited trail system used by hunters and recreators alike and the adjacent wetlands. My personal



observations of the ATV and ORV impacts off the Denali Highway to the South cause me serious doubts as to the recreational value of the Yanert Valley proper if the out-of-schedule and out-of-area proposal is adopted without adequate local input and fact-finding. The balance called for by the Tanana Basin Plan would be destroyed. In this respect, the Board may not rely the bald assertions underpinning the Fairbanks Advisory Committee' proposal. The negative aspects of this proposal must be properly considered by and, if then justified, advanced by the "appropriate" local Middle Nenana Committee before consideration by the Board.

#### Conclusion

Proposal 232, proposed by the out-of-area Fairbanks Advisory Committee and accepted by this Board outside-of-schedule as part of an annual reauthorization of antlerless moose hunts, must not be adopted. The proposal, changing a long-standing and balanced policy on motorized vehicle use in a discrete local area, cannot be accepted without a complete review by both the local advisory committee and appropriate and meaningful notice and opportunity to be heard by all interested parties. As demonstrated above, the benefits and improvements advanced in support are virtually non-existent and the negative impacts are greatly understated or ignored by the proposal. If, in fact, the proposal has merit the Middle Nenana Advisory Committee, which includes representatives from the local areas admitted to be affected both pro and con, is the appropriate advisory



committee to consider and advance the proposal.

Stated simply, for the reasons stated above, Proposal 232 must be rejected.

A handwritten signature in black ink, appearing to read "Mark Moderow", with a long horizontal stroke extending to the right.

Mark Moderow



MATANUSKA-SUSITNA BOROUGH  
DEPARTMENT OF PLANNING AND LAND USE

FACSIMILE TRANSMITTAL SHEET

TO: Kristy Tibbles	FROM: F. Barker, Mat-Su Borough
COMPANY: AK Dept of Fish & Game	DATE: 2.18.11
PHONE NUMBER: 907-465-4110	PHONE NUMBER: 907-746-7439
FAX NUMBER: 907-465-6024	FAX NUMBER: (907) 745-9876
RE: Board of Game comments	TOTAL NO. OF PAGES INCLUDING COVER: 6

URGENT     FOR REVIEW     PLEASE COMMENT     PLEASE REPLY     PLEASE RECYCLE

NOTES/COMMENTS:

Attached is a 5 page letter from the Mat-Su Borough Mayor's Blue Ribbon Sportsmen's Committee commenting on proposals for the upcoming Board of Game meeting.

[CLICK HERE AND TYPE RETURN ADDRESS]





**MAYOR'S BLUE RIBBON  
SPORTSMEN'S COMMITTEE**  
Matanuska-Susitna Borough  
350 East Dahlia Avenue • Palmer, AK 99645

Feb. 18, 2011

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

Members of the Board of Game:

The *Matanuska - Susitna Borough Mayor's Blue Ribbon Sportsmen's Committee* (BRSC) would like to introduce our committee and participate in public comment on specific Board of Game proposals that, if adopted, will affect residents of and visitors to the Matanuska-Susitna Borough.

The sustainability, utilization, and enjoyment of fish and wildlife resources are essential to the character, lifestyle, and economy of the Borough's residents. In February 2007, the Borough established a Mayor's Blue Ribbon Sportsmen's Committee to represent its interests in the preservation and allocation of available fish, game, and habitat for sportsmen's purposes. The BRSC consists of dedicated volunteers appointed from the public to advise the Borough Assembly and the State of Alaska Boards of Fish and Game regarding practices and policies that affect the people of the region.

The BRSC committee currently consists of a borough assemblyman, two retired Alaska Department of Fish and Game (ADF&G) employees, both of whom have also served on the Alaska Board of Fisheries, a fisheries biologist employed by the Chickaloon tribe, a retired area fishing guide who currently serves on the Susitna Valley Fish and Game Advisory Committee, and an active area fishing guide who currently serves on the Matanuska Valley Fish and Game Advisory Committee. All except one of these members hunt big game within the borough.

Past efforts by the BRSC have been heavily focused on salmon management concerns. This is our initial effort providing recommendations to the Board of Game concerning specific moose and caribou hunting proposals for animal populations located within or partially within the borders of the Matanuska - Susitna Borough. The BRSC values utilization of the best available scientific data to manage game and fish resources in a manner which maximizes and provides social and economic benefits for all resources users.



The BRSC prefers general season hunting opportunities over permit hunting opportunities, when game populations are sufficient to allow them, as general hunting provides expanded participation and harvest opportunity for ALL hunters on an annual basis, rather than expanded opportunities for only those fortunate enough to win or be given a special permit during a specific year. Allowing more hunters to participate on a regular basis better maximizes social and economic benefit from the resource.

The Committee recommends Board of Game support and adoption of one specific caribou hunting proposal and five moose hunting proposals. In addition, BRSC opposes adoption of one moose proposal. We've listed our recommendations and reasoning concerning these specific proposals in numerical order below.

Caribou Proposal Recommended to Adopt:

#47 Would modify caribou permit hunts in Unit 13 to provide both a Tier I hunt and drawing permit hunt available to all Alaska resident hunters.

Moose Proposal Recommended Do Not Adopt:

#63 Would change the Unit 13 drawing permit moose hunt season.

Moose Proposals Recommended to Adopt:

#64 Would modify the moose bag limit in Unit 13.

#84 Would require antler and jawbone specimens provided to the Alaska Department of Fish and Game from hunters harvesting bull moose in Unit 14A.

#85 Would provide antlerless moose permits for archery hunts in Unit 14A.

#86 Would create a Unit 14A bull moose permit hunt.

#92 Would create a Unit 14B bull moose permit hunt.

Caribou Proposal Reasons for Adoption Recommendation:

**Caribou Hunting Proposal 47** -- Recommendation ADOPT. BRSC supports allowing a Unit 13 Tier I caribou hunting opportunity where all households of state residents would have an opportunity to participate in the caribou hunt on an annual basis with a one caribou per household bag limit. We support the concept of requiring each household member of a participating household to choose Unit 13 as their exclusive Alaska moose and caribou hunting opportunity for that particular year as a way of limiting participation. This approach combined with the opportunity for all remaining Alaskans to participate in a drawing permit hunt that would harvest any and all remaining harvestable surplus Unit 13 caribou seems the best approach we could identify for allowing all Alaskans an opportunity to participate on an annual basis in use of this limited resource.



Moose Hunting Proposal Reasons for Do Not Adopt Recommendation:

**Moose Hunting Proposal 63 -- Recommendation DO NOT ADOPT.** Because of the open alpine nature of much of Unit 13 and increased activity level of bull moose late in September, MSBSC felt that shifting the any bull permit hunt season later in the month would likely increase permit hunters' success rates. Increase in harvest by permit hunters could dictate additional restrictions to the general hunt or a reduction in permit numbers, either of which would reduce hunter participation opportunities, thereby reducing benefit from the Unit 13 moose hunting opportunity.

Moose Hunting Proposals Reasons for Adoption Recommendation:

**Moose Hunting Proposal 64 -- Recommendation ADOPT.** BRSC's reasoning for supporting a 3 brow tine 50 inch moose bag limit in Unit 13 is based on our preference for general hunting opportunities where more hunters may participation and enjoy expanded harvest opportunities versus drawing hunt opportunities for a more limited number of hunters.

If ADF&G's best science supports a decrease in Unit 13 any bull moose hunt permits in order to reduce risk of over harvest for the first year or two of a general season 3 brow tine 50 inch moose bag limit regulation, then the BRSC would support such a change.

From ADF&G analysis, the amount of Unit 13 bull moose available to harvest with a 3 brow tine legal regulation versus a spike / fork regulation could be quite similar -- especially during the first year of harvest. After some of the accumulated 3 brow tine moose were harvested during the first season of a three brow tine bag limit (which already occurred in 2011) this portion of the harvest may decline somewhat for a year or two, thereby increasing low bull to cow ratios in some areas. As initially protected spike / fork bulls age, and some grew 3 brow tines making them legal for harvest, the number of 3 brow tine bulls available for harvest would quickly increase.

Concerning natural mortality rates for spike / fork bulls and mature bulls -- ADF&G biologists' thoughts are that BOTH of these components have increased post - rut winter mortality when compared to other moose in the population (with the exception of calves of that year) -- so perhaps natural mortality for these two classes of animals could be a wash or near breakeven situation.

Would calf production likely decrease if the bull population was shifted to a lower age through a 3 brow tine bag limit? We accept the premise that average age of bulls within the population would shift lower under a 3 brow tine harvest strategy, which focuses increased harvest on older bulls -- but the idea there would be an increased likely hood of lower calf production is not supportable by: A. the past history of Unit 13 moose hunting opportunities and resulting ADF&G surveys of calf production, B. the history and ADF&G surveys of calf production from current 3 brow tine legal moose regulations



provided for by spike / fork 4 brow tine 50 inch moose regulations compared to calf production from other antler restrictions used previously in the Unit. Additionally, in Unit 13 (as witnessed annually by many hunters) there is a significant portion of the mature bull population with antlers less than 50 inches in width, which also has less than 3 brow tines on either antler -- this component of breeding bulls would remain protected under a 3 brow legal regulation.

If the harvest number of moose would likely remain similar (as mentioned by ADF&G) under both harvest scenarios -- what advantage would there be to harvesting 3 brow tine bulls instead of spike / fork bulls? One significant advantage would be the amount of meat harvested each year. According to ADF&G data, the difference in average weight between a yearling moose and a moose only one year older can be close to a 100% increase. This weight increase of harvestable meat only grows larger as individual moose increase in size over several years. In an area where the number of hunters and size of the moose population dictates that each hunter will not be able to harvest a moose each year, a harvest strategy focused on harvesting even a slightly older age class of moose can result in a greatly maximized benefit (in pounds of additional meat) from sustainable annual harvests.

For the above reasons, BRSC encourages the Board of Game and ADF&G to pursue a moose harvest strategy as suggested in Proposal 64 that would likely maximize benefit (as required by the state Constitution) from the Unit 13 moose hunting opportunity.

**Moose Hunting Proposal 84 -- Recommendation ADOPT.** BRSC supports the Alaska Department of Fish and Game using the best scientific data available in managing Unit 14A moose hunting opportunities in order to maximize benefit from the resource.

**Moose Hunting Proposal 85 -- Recommendation ADOPT.** BRSC supports the concept of maximizing benefit from the resource. When the number of hunters dictates limitations on general hunting opportunities, but additional hunting and harvest opportunities remain, the committee supports the use of drawing permit hunts to maximize benefit in a sustainable manner. Unit 14A antlerless moose hunts are highly valued with the number of applicants greatly exceeding the amount of available permits. Therefore, we support this proposal which would allow an increased number of hunters to win highly desired antlerless moose hunting opportunities on a more regular basis. Maximizing participation in a sustainable manner maximizes benefit from the resource.

**Moose Hunting Proposal 86 -- Recommendation ADOPT.** While the current general bull moose hunting season in Unit 14A often harvests nearly all harvestable surplus bull moose on a unit wide basis, the committee believes there remain specific areas within the unit where limited drawing hunts could further maximize benefit from the resource. As written proposal intent would limit drawing permit hunts to areas where ADF&G data documents bull to cow ratios exceeding the unit minimum objective level. Such a hunt could thus be restricted even to an individual stream drainage. Like all permit hunts, the available number of permits could be adjusted to match the number of harvestable surplus animals annually, or if current population data was unavailable, permits could be reduced to minimal numbers as a precautionary measure. The committee supports the

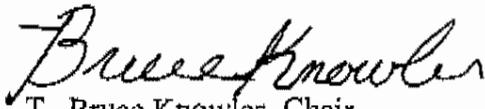


reduced to minimal numbers as a precautionary measure. The committee supports the concept of scheduling a permit hunt at a time where it would avoid increased crowding and competition during the general season.

**Moose Hunting Proposal 92 -- Recommendation ADOPT.** The most recent ADF&G moose population survey data indicates there are harvestable surplus bull moose available in Unit 14B. #92 is the only proposal in this cycle's proposal book seeking an expanded opportunity to harvest surplus 14B bull moose. BRSC supports the concept of maximizing benefit from the resource, and would like to see how scheduling a short permit hunt, where numbers of participants could be maximized, and at a time that does not crowd or compete with general season hunters would work.

Thank you for the opportunity to comment.

Sincerely,



T. Bruce Knowles, Chair  
Mayor's Blue Ribbon Sportsmen's Committee



## Alaska Professional Hunters Association, Inc

HC60 Box 299C Copper Center, AK 99573

Phone: 907-82-3755 Fax: 907-822-3752

Email: [office@alaskaprohunter.org](mailto:office@alaskaprohunter.org) [www.alaskaprohunter.org](http://www.alaskaprohunter.org)

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### Facsimile Cover Letter

Date: February 18, 2011

To:

Alaska Department of Fish and Game

Boards Support Section

PO Box 115526

Juneau, Alaska 99811-5526

Fax: 907-465-6094

Number of Pages including cover letter: 14



# ALASKA

## PROFESSIONAL HUNTERS ASSOCIATION, INC.

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February 18, 2011

Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811-5526  
FAX No. (907) 465-6094

### 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



FAX to AK Board of Game  
(907) 465-6094

I am adamantly opposed to  
Proposal #50 re: Community Hunt  
Permits.

It runs counter to the State  
Constitution and would present a  
nightmare of administrative and  
enforcement problems. Let's keep the  
allocation of our game resources on  
a level playing field where all Alaskans  
have equal opportunity to access our  
game & fish resources.

Richard A. Hemmen

RICHARD A. HEMMEN  
1283 Lingeriew Rd.  
North Pole, AK. 99705  
Phone: (907) 488-2239



February 12, 2011

To: Board of Game  
FAX: 907-465-6094

From: Bryan J. Scoresby  
Palmer AK



Subject: Proposal #50

I am writing to you in opposition to Community Harvest Permit Proposal #50 for the Nelchina Caribou Herd.

The State Constitution clearly outlines the guide under which the Board of Game should check and measure all proposals as they work to fix issues and expand the rules for equal access of all residents to the wildlife resource. I put them here to be read and considered.

Section 8.17 - Uniform Application.

Laws and regulations governing the use or disposal of natural resources shall apply **equally to all persons** similarly situated with reference to the subject matter and purpose to be served by the law or regulation.

Section 8.3 - Common Use.

Wherever occurring in their natural state, fish, wildlife, and waters are **reserved to the people** for common use.

I ask some questions and do not find any answers in the proposal.

1. How does establishing a CHP help meet the Board of Game's responsibility to uphold the Constitutional guides of "equally to all persons" and "reserved to the people"?
2. Why should Rural Communities get a preference for any wildlife resource over other residents of the state?
3. What did they (rural residents) do to deserve it if any?
4. What are the other options available to rural residents for the resource?
5. Why do Residents of rural communities need access to more game?

In answer to these questions I have some simple answers to the same questions.

1. It doesn't. The Board of Game has a constitutional responsibility of equality to all residents of the State. Community Harvest permits, though shared to all in the community does not meet that standard. It may be benevolent of the



- community hunters to share their bounty with all other community residents, but that is not the standard. All residents in the State is the standard. When a limited # of permits is granted to a group or community, then my right to equal access to the same resource is infringed.
2. They shouldn't. Rural residents are closer and because of their proximity already enjoy and have more access with that comparative advantage to the wildlife resource than those who live further away. No law will change that anyway.
  3. Nothing.
  4. Federal Permits for one. Tier II permits for two, Tier I permits for three and drawing permits for four.
  5. The don't. They have enough and too much already

The current four systems of gaining access to the Nelchina herd is more than sufficient to harvest more game the community could possibly use. Under the Federal permit system, a family can receive up to 8 caribou and two any bull moose harvest tickets. A family of 4 – 5 cannot eat that much meat anyway. If someone was to harvest that much meat, they would either have to share it or waste it, as it would spoil before that family could possibly eat it all.

Tier II permits are simply a privileged hunt as it is and unfair to everyone else (the other 708,000 residents of the State) that do not receive one. Tier I permits, while fair are restrictive to eliminate competition for game resources elsewhere. The latest addition of the draw permit is the first and only fair and equal to all residents in acquiring a Nelchina caribou permit.

Suggesting such a proposal as a Community Harvest Permit is certainly an absolute claim that priority to residents of the rural Community are more deserving than the rest of Alaska residents. Nowhere in the Alaska Constitution is there a clause of rural preference for wildlife resources. I admit that the Federal law, ANILCA does promote a rural preference. The federal government already does that with their Federal Permits to rural residents. The State need not try to reach, copy or promote the Federal Government's law here. The State should, when it comes to managing wildlife resources on state lands, simply tell the Federal Government, a polite no!

I urge the Board of Game to vote against this sorry proposal as it does not meet the standard by which any of these changes should be considered and measured.



1

**Date: February 22, 2011**

**To: Alaska Board of Game Members**

**From: Joe Chythlook, BBNA, On Contract**



**Re.: March 4-11, 2001 Board Proposals**

Dear Lady and Gentlemen:

First of all, I want to thank you for the opportunity to make some comments on issues that are before you at the March 4-10, 2011 meeting.

My name is Joe Chythlook, a resident of Dillingham, Alaska. I have also resided in the State of Alaska all of my life and am a citizen of USA. I recently retired from service to the State of Alaska, ADF&G, Boards Support Section, after 21 years ( or seasons) of service in May of 2009. I am currently Chairman of the Bristol Bay Native Corporation (BBNC) Board. BBNC is one of the 12 Alaska Regional Native Corporations, created under the 1971 Alaska Native Claims Settlement Act (ANCSA). BBNC represents 8700 shareholders of which about 50% still reside in the Bristol Bay region. Many of these shareholders are also tribal members in the Bristol Bay region. Most of Alaska's renewable fish and game natural resources are very important to all of our shareholders regardless of where they reside. Therefore, the proposals that are before you today are of great importance to all.

Most recently, I was hired under a limited contract by Bristol Bay Native Association (BBNA), a Tribal Consortium, made up of 31 Tribes. BBNA, which was organized as a non-profit corporation, provides a variety of educational, social, economic and other related services to the Native people of the Bristol Bay region of Alaska. As you can see, from the enclosed map of the Bristol Bay region, all of the villages, which make up the communities in which Tribal members live, are confined within the boundaries and areas described in Game Units 9 & 17.

My contract is to work with Frank Woods, Subsistence Coordinator for the Natural Resources Department. The task assigned to us is to continue to work on the **Bristol Bay Moose and Caribou Enhancement Project** which was started by Hans Nicholson during the spring of 2009. The project, as defined by Hans in his draft minutes of the April 22, 2009 meeting he conducted in King Salmon, Alaska, was "to discuss and find solutions to address low moose and caribou populations in Bristol Bay". Part of my contract is to help Tribal members address their concerns, some of which are expressed by Hans, during the Board of Game process. (Please refer to the two enclosed documents headed **Bristol Bay Moose and Caribou Enhancement Project** for detail.)



2.

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Since I was contracted, I've had a chance to review the said documents and have shared some conclusions from them in several local Fish and Game Advisory Committee meetings I have attended in the region. Frank Woods and I also attended a meeting with some folks from Game Unit 9 E in Port Heiden for which I prepared some conclusions from the papers cited with the intent to get some feedback from the attendees. I have prepared a draft meeting report which is also enclosed entitled **Bristol Bay Moose and Caribou Enhancement Project Follow Up Meeting** describing what happened at that meeting. (Please refer to my enclosed report for detail)

Some of the highlights I want to share from that report suggest:

- Brown bears have become the primary limiting factor on the moose population growth in Unit 9.
- The latest biological information we have on moose populations in Unit 9 is several years old.
- The current very high bear/moose ratios would require substantial reductions to bear densities to achieve a measurable moose calf survival.
- Since ADF&G places a higher priority for management of brown bears in Unit 9, any proposed drastic reduction in their numbers would probably be met with opposition by a large segment of the public.
- Local residents agree that brown bears are increasing in numbers and were causing more problems at fish camps, local lodges and villages and were preying on game species that local folks rely on for subsistence food.
- The overall consensus is that brown bears are more of a problem than wolves and control measures need to be implemented sooner than later.
- Very little action has been taken on predator control proposals in past Board of Game meetings in this region.

Members of the Board, the concerns expressed in both sets of the given reports and the public testimony you will hear from the tribal members of the Bristol Bay region as well as that of the local advisory committees most certainly will reveal that problems with predation by both brown bears and wolves are prevalent in both Units 9 and 17. There are several proposals before you which suggest and address how solutions to these problems should be acted on by you. The local fish and game advisory committees, which in most cases are members of the BBNA tribes, have taken action on these proposals which I hope you will give merit to. BBNA supports actions by the local advisory committees for that reason. I will be addressing some of the individual proposals during your meeting.



3.

3

Having spent many years in watching the Board of Game process at work, I appreciate the challenge that you folks face. I also realize that you have to be fair to all the folks that make up the "public" during the dellberation process. Your main charge is to make the resources available for all the people of Alaska. Just remember the folks from the Bristol Bay Tribes make up some of that number. And since most of them live in the game units described year round, they depend and use the resources which are available in the area for their very sustenance.

I plan to be around for most of the upcoming meeting and will be available to help discuss and come up with some solutions which hopefully will address some of our concerns.

Thank you again very much for you time and I will see you in Wasilla.

Joseph L. Chythlook

P. O. Box 692

Dillingham, Alaska 99576

Home phone; 842-1099, Cell: 843-1219

Email: [jchythlook@bbnc.net](mailto:jchythlook@bbnc.net)

ENCLOSURES



4.

# Bristol Bay Native Association

P.O. Box 310, Dillingham, Alaska 99576 ~ Phone 907-842-5257 ~ Fax 907-842-5932

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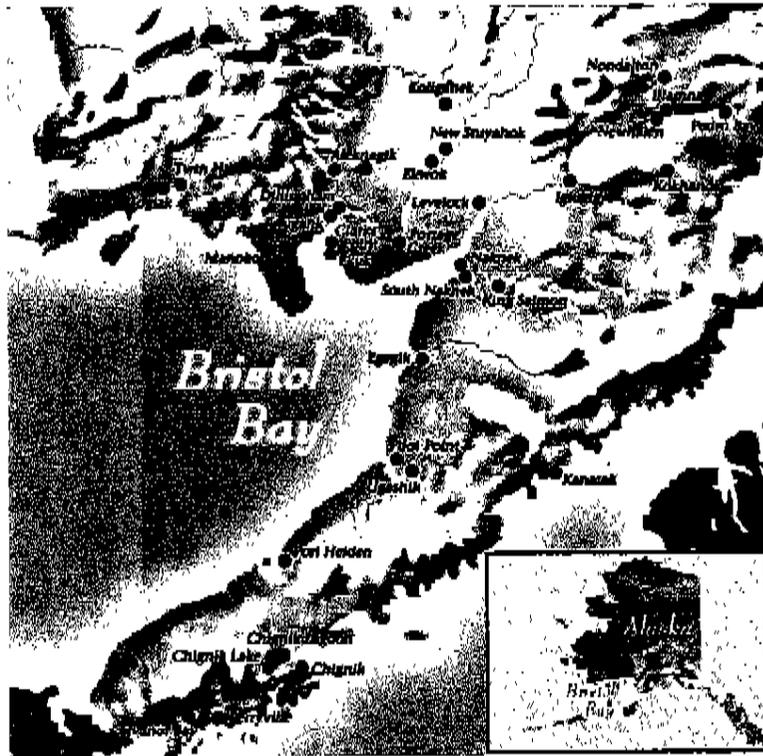
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**Bristol Bay Native Association, Inc.** is a Tribal Consortium, made up of 31 Tribes and is organized as a non-profit corporation to provide a variety of educational, social, economic and related services to the Native people of Bristol Bay region of Alaska.

**The Misson of BBNA** is to promote self determination of Tribes of the Bristol Bay region, and the betterment, well-being, culture and interests of the Native People of the Bristol Bay Region.



Click on the red dot of the village for more information.

### The Villages BBNA Serves

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### Aleknagik Traditional Council

P.O. Box 115  
Aleknagik, Alaska 99555



5.

# BRISTOL BAY MOOSE AND CARIBOU ENHANCEMENT PROJECT

King Salmon Village Council Building  
King Salmon, Alaska  
April 22, 2009  
10 am.

## DRAFT MEETING MINUTES

### 1. Welcome and Purpose of meeting

a. Hans Nicholson called the meeting to order at 10:15 a.m. and introduced Himself and welcomes everyone who has attended and for their interest and commitment n working together in addressing game issues in Game Management Unit 9. He explains that the BBNA Board has brought this issue forward and the resulting action is called the Bristol Bay Moose and Caribou Enhancement Project.

He explains that he has been hired by BBNA to facilitate a series of meetings to discuss and find solutions to address low moose and caribou populations in Bristol Bay. He explains that a similar meeting was held in Dillingham on April 2. The goal sought is for the formation of a working group to come up with solutions to enhance moose and caribou populations.

He explains that he used to work for BBNA in Dillingham from 1999-2004 as the Subsistence Coordinator. He is still the current chairman of the Nushagak Advisory Committee since the mid 90's and has been involved in the regulatory process since then. He's enjoyed meeting a lot of people and have witnessed many times, people's frustration with the process when they know what the issue is and how it could be fixed, but oftentimes, for lack of information or threats of lawsuits, or for other reasons, nothing gets done.

He will be the facilitator during this meeting and the goal sought is for multi-agency collaboration with others towards a cooperative effort in rebuilding our moose and caribou stocks. Discussion today will be to identify issues that we as a group can focus on and agree that they should be addressed. BBNA staff will form a working group made up of stakeholders from different agencies, land owners, village councils, professional hunt guides, hunters or others recommended after the conclusion of this meeting. One outcome is that this working group can then find solutions to issues in whatever way they can through the normal FSB and BOG process or other means.

He acknowledges that moose and caribou populations are down in unit 9 and that there is no short-term remedy. The formation of the working group will address issues over the long term and BBNA is committed to find ways to make it happen.



## 2. Introductions:

Hans asks attendees to introduce themselves: Those in attendance were Geoff Beyersdorf, BLM; Chuck Ardizzone, OSM; Sandy Rabinowitch, NPS; Mary McBurney, NPS; Donald Mike OSM; Bobby Fithian, Alaska Professional Hunters Association; Dom Watts, USFWS; Bill Schaff, USFWS; Joel Hard, NPS Lake Clark; Troy Hamon, NPS Katmai; Randy Alvarez, BBRAC Chair and Igiugig VC; Tim Enright, Ugashik VC; Pete Hill, Richard Wilson, Pete Caruso, Dale Myers, Kathleen Myers, Eddie Clark, and Fred Pike, Nak/Kvi AC.

## 3. Update on BOG action March 2009 meeting for Unit 9 proposals.

Hans report that the BOG actions include: Modifying the winter moose bag limit to one "antlered bull" in Unit 9 from one bull. The board closed the caribou season and adopted intensive management and harvest objectives for caribou in Unit 9d. The board closed the non-resident caribou season throughout the range of the Mulchatna Caribou Herd. The board lengthened the wolf season to May 25 and increased the daily bag limit to 10. The biggest controversial issue in Unit 9 was the Boards establishment of a predator control plan for wolves in sub-units 9d, and e. The Board instructed staff to draft the plan for their review at their next scheduled meeting. This meeting will be in Nome in November 2009 and they will take action pending its review.

Residents report that moose are hard to come by and that competition between guided sport hunters, non-resident and resident hunters make it difficult for local resident hunters to harvest one. Hans refers to the letters in the meeting packet from the Port Heiden Village Council and Patrick Kosbruk writing on concerns of competition for moose from the sport industry. Moose seem to be more plentiful in some areas of unit 9 but are more difficult for residents of 9e to get especially those communities in southern 9e. Red meat is definitely harder to come by in Unit 9 than it is in Unit 17 as for the most part, moose populations are healthier in 17 and residents are still given the opportunity to harvest caribou when opportunity arises.

For those attending today's meeting, the predator control program for sub-units 9d and e generated a lot of discussion on wolf impacts to prey populations. Hans indicated that during the BOG meeting, board members were very sympathetic because of testimony given indicating increasing numbers of wolf and bear numbers. The predator management program in Unit 10 was successful because latest reports indicate that there is a higher calf/cow ratio now and that predator mortality has decreased. Since the NAPCH went into Tier II status and then closing, no hunt opportunity on the herd and limited opportunity on the Mulchatna Caribou Herd, meat harvests declined so much to the point that residents are forced to buy costly store bought meat.

Those attending felt that it was unfortunate that we did not have the ADF&G presence here at this meeting as agencies rely on them for their game information. Lem Butler has taken a job in Juneau and his replacement has not yet been named. The job advertisement ends the end of this month.

APHA agreed that the predator control program in Unit 10 was successful because that is what it was intended to do, to reduce predator populations so that prey populations could recover. It's worked well in other parts of the State as well. Gives reference to the Nelchina moose and caribou populations that are in intensive management.

Hans gives reference to the Population Enhancement Action Plan for the Nushagak Moose and the Mulchatna and Alaskan Peninsula Caribou Herds report to the BBNA Executive Board handout dated February 15, 2008. In this report Frank Woods, BBNA Natural Resources, wrote that in Phase III one solution proposed a Trappers and Hunters Association to develop a subsidy program to help local trappers become more efficient. In his proposal the subsidy program would:

- Provide fuel and supplies to qualified trappers with business licenses and track records in harvesting fur-bearing animals. (Best of the Best) Limited to 5-10 villages.
- Provide trapping and snaring classes throughout the villages for a trapper to become more successful. Include the youth for the cultural aspect.
- Reward the successful hunters and trappers with a stipend.

The problem Frank Woods encountered was that the "subsidy" program could be perceived as a "bounty" and that BBNA could not initiate the program. Bounties are illegal in the State Constitution. In his research he found out that although organizations cannot advocate what you would call a "subsidy program", groups could. Hans felt that this was one concept that the working group could address as it could economically benefit hunters and in the long term, lower predator populations.

Although Phase III is still the long-term goal, Hans explains that he feels that we are still in Phase II with the ultimate goal of forming the working group. The meetings in Dillingham and here in King Salmon will be instrumental in identifying issues, possible solutions, and recommendations for the working group. Once he drafts his report to BBNA, he envisions that a working group will be formed pending Board direction. He feels that these meetings are laying the groundwork and basis for the formation of the working group.

APHA thought the concept is good and that his organization would be willing to help the working group generate or draft a "plan". This would encourage local hunters to hunt or trap and help keep their operational costs down.

The BLM representative said that in Galena the village council wrote and got approval for a Fish and Wildlife Grant for a Harvest Incentive Program that gave hunters and trappers fuel. This was very successful.

One local resident felt that we are in crisis right now. Our moose and caribou populations are going down and the managers haven't done anything yet. It doesn't

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make sense to let the numbers go so low to prohibit hunting and still see the populations declining because of the predator impact. Something needs to be done now because they can't hunt caribou and in some areas, moose are impossible to get. When Lem Butler first got here, he had asked him to sit down with Jay Hammond to reap some of the benefit of Jays long history and game resource knowledge in the Bay on predator control. He thought that it was really unfortunate that Lem didn't because of Jay's wealth of knowledge of predator hunting. He felt that moose and caribou issues got worse after the land-and-shoot stopped in 1992. The program didn't cost the State anything when local hunters harvested over 200 wolves annually in Unit 9.

Hans responded that predator control programs are difficult for the State to initiate because of IM criteria, lack of information, high costs, ballot initiatives that prohibit, and special interest groups that sue the State whenever they make any attempts at predator control. He thought that this would have to be addressed politically and would need legislative change.

APHA said that professional guides are prudent managers of resources. They spent a lot of money working on a predator management plan. They encouraged the department to take action sooner, rather than later when game resources drop. He recommends revising State law to effectively take action and thinks that we should be talking to our local legislators and senators to change some of the probative language. They proposed an "Active Management Bill" HB 256, introduced in 2008. The bill did not pass last year. It passed legislative hearings but got stalled in committee.

Locals question what the State should be doing for them? They should manage the resource for the benefit of everyone. Another local offered that the State does not advocate "Rural Preference".

Hans said that game managers manage for sustained yield. The 1998 Sustained Yield definition includes as one of its goals, high human harvest. The Federal managers have their mandates and policies that their goals are different because they manage for abundance and don't manage for sustained yield. This brought up a lot of discussion on the Federal Mandate, Policies and how it is different from the State.

APHA said that we always seem to be fighting over management of species. There are pretty substantial MOA's between the State and Federal managers. He thought that since the Feds took over management on their lands, the best interest of the State went by the wayside. He felt that ANILCA provides the mandate. The State is currently pursuing concerns and is meeting with the USFWS on May 18. The hopeful outcome is to develop better cooperation between agencies. Sarah Palins Special Deputy Commissioner, Cory Rossie, will be at that meeting.

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#### 4. Update on BBRAC meeting

Donald Mike, BBRAC Coordinator reported that the BBRAC meeting scheduled for March 23, 24 in King Salmon was rescheduled to April 2 in Anchorage because of the Mt. Redoubt volcanic eruption.

Donald reported that the FSB put Bristol Bay moose back in the hopper. Proposal 30, 31 was submitted by the BBRAC. These two proposals would shorten the moose season and close federal land to non-subsistence users. OSM explained the concept of what proposals 30, 31 would do. Donald said that river corridor closures on Federal Lands in Unit 9b,c would allow hunting for rural residents only.

The RAC chair said that their AC turned in the proposals two years ago and the original proposal language they asked for river corridor closures for non-resident hunters. It was submitted again during the Bristol Bay cycle and later found out that it was against ANILCA because the effect of the proposal would restrict user groups.

Another resident said that if it did pass, the domino effect would force those displaced hunters to go elsewhere and that he is not against non-resident hunting.

APHA said that if we want good information, surveys, etc., we should be considerate of the non-resident contribution because 85% of conservation funding comes from non-resident fees. A hunter license fee consideration failed in Juneau. He indicated that guides have a long history of supporting subsistence. In further discussion he references ADF&G Technical Paper No. 283 (Harvests and Uses of Caribou, Moose, Bears, and Dall Sheep by Communities of Game Management Units 9B and 17, Western Bristol Bay Alaska 2001-2002). He references household survey information that in some villages, local village hunters report harvesting moose out of season and some villages indicating cow harvest. He feels that it is difficult to support deleting non-resident hunting opportunity when they look at this survey data.

Ensuing discussion on moose mortality and causes; neonatal, natural, predation, and hunter effort.

One resident in attendance asked what is the biggest contributor to moose mortality?

Hans responds that in Lem Butlers 2006 Moose Management Report from July 2003 to June 2005, he reports that Brown bear predation on neonatal moose was the major limiting factor preventing an increase in moose densities in Unit 9, followed by harvest of cows in some areas. Lem felt that the very high bear/moose ratios would require substantial reduction in bear densities to achieve a measurable improvement in moose calf survival. ADF&G has placed a priority on managing bears in Unit 9, and any drastic reduction in bear numbers would probably be opposed by a large segment of the public.

APHA thought that one goal that needs to be established is Intensive Management numbers for Brown Bears. He felt that moose and caribou populations were delicate

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prior to ballot initiatives brought forth by the public that sought to prohibit predator control programs. When the ballot initiatives passed moose and caribou populations continued to decline as predator populations ballooned. He agrees that bears have a bigger impact than wolves.

Hans agrees with APHA and said that ADF&G and USFWS research on radio and satellite collaring of wolves and tracking information indicates that during the summer months wolves are feeding predominately on salmon. During the fall they frequent beaver lodges and dams. During the winter they are opportunistic and look for prey species (moose, caribou, other game, etc.). During the spring, there is little evidence that they go to the caribou calving grounds in numbers that everyone had expected. Evidence shows that by far, bears have more impact on prey species.

Hans says that the APHA is a good organization. Every game meeting he's attended, he's seen them there. They are concerned about our resources and help us a lot. He feels that even though he doesn't agree with them on every issue, it is good and feels that it would benefit us to have their presence on our side in achieving common goals. Their organization is professional, knowledgeable, and willing to be good stewards of our land and resources.

Donald continues with his report saying that the RAC is interested in submitting caribou proposals to keep the Federal season open and align State/Federal seasons but recommends keeping the Federal ending date, which is later than the States.

Randy brought up that current Federal and State regulatory seasons are very confusing especially when they have different start and end dates. On BLM lands there is as much as a two-week difference in ending season dates. It only makes sense to align season dates to reduce confusion.

Those in attendance agree that over time, the significance of bear predation has become more of an issue but is harder to address because of the lack of population information. Everyone agrees that bear populations have increased and that they are now more bold around communities than ever before.

Break at 11:40 a.m.

Back to order at 11:55 a.m.

##### 5. Report on present status of moose, caribou, bear, wolf population in Unit 9

Hans felt that it was unfortunate that the ADF&G was not here. He wanted to ask the Department how they managed for sustained yield when they do not have population estimates for moose and only give reference to densities per square mile and what IM objectives did they have.

APHA said that manager's strategies are to manage species as a whole to a certain sustainable number. He talked about the program in McGrath where it was easier to have

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control factors in the predator management plan. In Unit 9, the Alaska Peninsula is such a vast area that makes it difficult and expensive to conduct population census on moose, caribou, bears, and wolves. Funding for research projects is important to gather baseline information and that we should be talking to our legislators to sponsor House Bills to fund projects.

Hans indicates that since the department is not here, we will have to rely on the Park Service and USFWS for information.

A local brings up an issue of that he feels that staff does not work with them and that issues do not get addressed adequately. He feels that the RAC and AC's have difficulty working with agencies when it comes to attempts in addressing issues and getting something done. They're frustrated to see their caribou populations decrease to a point where they now unable to hunt and moose populations have declined and are difficult to harvest. He feels that actions should have been taken before this was allowed to happen is frustrated with the process.

Hans detects a feeling of animosity that locals have for staff present and tells everyone present that this isn't the platform nor the time to be arguing about the issue here. He was unaware of those feelings and asks to be educated. He wants this meeting to be productive and that we should be working together for a common cause. He asks everyone to put those feeling aside so that we could get on with this meeting and look at the bigger picture.

Another local says that he hasn't hunted caribou for the last 10 years. He feels that ADF&G hasn't done much to address the decline of the NAPCH. He feels that the department gets good feedback from the private sector on game abundance whenever guides report where moose and caribou are. He feels that the reason moose populations are up in King Salmon Creek is because wolf populations happen to be down in that area.

Another local asks what composition surveys are and how to interpret them? Staff present explains what they are and what the information means.

USFWS staff talked quite a bit about density information and how game is managed. The problem that they run into doing population surveys is that Unit 9 being such a large area whenever they fly transects, moose move back and forth making it difficult to get density information. He talked about carrying habitat for moose. He reports that good range supports .1-.3 moose/sq.kilometer. Excellent range supports .4 moose/sq.kilometer.

One resident asks staff if they have a position on predator/game ratios? He said that he department told them that an appropriate ratio would be 1.5 game animals for each predator?

USFWS responds that predator programs will have to be high priority but that the Service is looking at it. Right now wolves are visible and of issue. With current harvest data and

information, trends are difficult to establish. They are taking a look at moose densities on the refuges.

Lunch break at 12:25 p.m.

Back at 1:40 p.m.

## 6. Discussion

### a. Focus of meeting, purpose, issues, and finding solutions

Hans talks to the group about what he thinks the most important part of this meeting, to identify issues and to recommend solutions. This is what we've come here to discuss and to identify issues in-region that could be passed on to the future working group to work with. He suggests that we talk about current issues that are affecting game resources in Unit 9.

Randy says that the BOG passed the predator management plan for 9d,e. He thinks that they bring back the land and shoot, it was very successful and that they should develop something similar and asks if anyone objects?

A member of the Park Service says that he doesn't object but the current Park Service regulations prohibit although it could be supported on Federal Preserves under State management.

The USFWS says that they cannot support it right now because of the Federal Mandate.

The APHA suggests that a subsidy program would be accomplishable in the short-term. They support the concept of a predator management plan by sub-unit and the focus should be a consideration to rebuild defined caribou populations. Cooperation between State/Federal Agencies is encouraged and a working group should seek some type of legislation for active management.

The USFWS suggested that training trappers through trapping clinics could be a good idea; he's seen it work well in the Yukon villages.

BLM sees a huge disparity between the door-to-door household surveys and harvest report information. (Technical Paper #283). More emphasis needs to be put on turning in harvest tickets to get accurate harvest information. He thinks that harvest tickets would show what is needed or required and encourages compliance. It's important to take a look at good biological data as well as year-to-year meteorological influences when making management decisions. Cooperative information gathering projects would work well too.

Hans mentions and acknowledges what locals are saying when the NAPCH population numbers dropped off further even when the hunt effort was closed and the Department didn't take any proactive action other than closing the hunt and wonders what else that they could have done?

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A member of the NPS said that when he worked for the subsistence division, he's seen community harvest quotas where assigned hunters harvest game for the whole community. He thinks that assigning harvest by communities could be used as a regulating control to control harvest and could help some villages.

A local resident said that it wouldn't work here; there are too many variables.

APHA said that culturally, he is concerned about the youth. A subsistence hunt lifestyle is being lost because there are whole generations that have not experienced or hunted to provide for their families. He is also concerned about conservation. Moose are more susceptible to hunt pressure in tributaries when they group together in small herds and he thinks that community harvests would kill small herds.

NPS says that Lake Clark has a strong SRC. Currently brown bear and sheep are taken in alternating seasons. Even though they created a year-long season and capped the harvest, they never exceeded the brown bear harvest guidelines. With sheep, they created a winter hunt and are working toward that with moose.

Hans says that he doesn't want to lose the cultural aspect. He's hunted all his life, his children are hunters and he hopes that his grandchildren are able to hunt. If community harvesters hunt for the whole village, then families are not able to provide for themselves. What happens if there is not enough to go around? Are they precluded from hunting for themselves?

One local resident asks staff present where they get their bear numbers and what is their position on predator numbers?

The NPS responds that theirs is the same as the State's. They jointly do a cooperative survey with the State and Federal agencies participating to come up with bear density and population estimates. In all of 9b, they estimate approximately 2400 brown bears. For predator/prey ratio's, they do not have quality density estimates. They think that there are more bears than moose in the Park and are trying to evaluate funding for bear counts. It may be up to three years before they get good bear numbers given the complexity of survey protocol, timing, and weather.

The local resident responds that it's important to get good accurate numbers and ratios. He says that nobody around here knows how the government feels about bears. He says that bears are running out of game animals and going to the dump.

Another resident says that when he was flying in the Katmai Park, he saw way more bears last fall than in the past.

Another resident asks if there is a way to good bear counts? He recommends combining money to do multi-agency census surveys. Everyone thinks it's a good idea.

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APHA replies that the State and Feds will be meeting next month to talk about ways for multi-agency collaboration.

NPS says that this meeting will be to bring the Feds up to speed on State Predator Management.

A local says that we need a more independent study than Lem's way of doing surveys. To control predator populations, the local wolf hunter resource is not being used. You need to involve communities more.

Hans agrees that reported harvest is lower than subsistence household harvest information (Technical Paper #283). He says that when BBNA and the State did the household surveys, respondents were concerned that the information would be used against them. Now that we see the disparity between survey information and State hunting reports, it now looks like this volunteering of information could be used against them. When they did the surveys, they encouraged cooperation to achieve accurate harvest information. He doesn't want this information to be used against them. Information given was for harvest, there was no discerning whether it was State or Federal land where game was harvested, just location.

Local residents say that during the hunting seasons, they hunt mostly on State lands.

BLM says that 21E is similar. The Western Interior communities sent out a letter to the FSB recommending the need to have more information from this area. The result was agencies pooling survey money to get the job done. A big factor here is the difficulty level because project timing and weather influences. It's difficult to do surveys in Unit 9 because it is such a vast unit from one end to the next.

One local resident says that bears are running out of food. We know that we have bear problems and we have to figure out a way to address our problems. How do we alleviate? Change regulations? Change bear bag limit to one every year? People here do not like DLP. Where are we going to go? People just don't eat or use bears. He asks Staff, "How can you regulate if you don't take care of the big problem? You just refuse to take care of the big problem!"

Hans says that the biggest problem is that Unit 9e is managed for Trophy Bear and quality of hunt. This needs to be changed to intensive management for moose and caribou. It would take legislative effort to change management from focusing on "quality bear hunting" to sustaining moose and caribou populations. He feels that moose and caribou are more important to local communities that rely on them for food than sacrificing all that for conservation of bear populations.

A village council representative says that some BOG members are guides and will not budge. He feels that there is a conflict of interest when those board members vote on guide issues.

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APHA disagrees. Their organization has spent a lot of money establishing guide-use areas. Professional guides have to for registering; submit a prospectus (similar to USFWS, State) identifying areas where they will operate, what species, how it will affect the social atmosphere (how they will work with the villages). Basically, it is a social license to do business in Rural Alaska.

The USFWS says that guide-use areas are allocative. It doesn't support the subsistence lifestyle through ANILCA. Every time we lose opportunity for a user group.

NPS adds that the Intensive Management strategy is a legal issue. The State manages game by a certain standard. The Service manages on a different standard – biological emergency. Right now caribou populations are low but stable. As a superintendent, he is in a difficult position. He can't be, or do both. Intensive Management has been difficult since 1994 and during the Murkowski administration. He is of the opinion that season and bag limit manipulation doesn't work.

One local says that he is glad to be hearing this now. He is convinced that there is not enough information available now that he's heard the numbers. We need to know what the numbers are. What is the balance, or imbalance? We need to get on the same page.

NPS says that they do their own surveys and are highly confident in their own numbers. He's worked in Unit 9 since the 1980's and has witnessed the caribou population boom and their eventual migration moving west. He feels that the huge growth of the Mulchatna Caribou Herd affected the range and they moved elsewhere looking for food. He thinks that hunt pressure in 9B could have moved them west too as there are still areas in Northern 9B that have good food to sustain a caribou population but they're not there. When flying he's seen all the hunt activity and wonders if that could have partially attributed to changing migration activity? He doesn't think that they have a bear problem. Most of the bears are over on the Cook Inlet side. There are few guided bear hunts in the Lake Clark Park because hunts cost around \$18,000. There is very little bear hunt activity in the Preserve and doesn't know what the problem is. There are about 40 wolves in the Preserve. The brown bear population is mainly coastal and he doesn't see that kind of conflict as reported in other areas. He feels that their predator/prey issues are different.

One resident feels that we have consensus that there is not enough hunt pressure on bears. He says that the Park or Service will not change management unless the Federal Laws change.

Hans says that now that we've identified the sideboards, what can we do?

One residents commented that we need to get away from Tier II.

NPS says that restrictions in place force subsistence users to compete with non-subsistence users.

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One resident says that the bears pose a safety factor. Last year he had a bear come into his entryway looking for food. He feels that bears are now braver than ever before. Long ago, bears used to stay away from villages and people but are now coming into the towns and villages causing all kinds of problems. Bears have lost their fear of people and conflicts are happening more often and nothing's being done. What will it take? Will we wait until someone gets mauled?

USFWS thought that a possible solution would be to establish triggers for earlier detection for conservation concerns on numbers for bull/cow ratios. Certain activities may have to be curtailed (hunting) and managers will have to simultaneously address other issues. He gives the example of displacement of hunters in Galena when closures were implemented and hunters had to go further down the Yukon to hunt.

BLM said that in the Yukon/Kuskokwim Management Plan a lot of emphasis was put into getting good accurate information. Triggers were established that enacted Intensive Management action. He thought that this worked well.

APHA said that this is an uphill battle with what we have going on now. In the past, their organization has had difficulty working with agencies for projects in addressing issues. The need to do something different and recommends that change in management strategy is necessary. He gives an example of helping fund a project in the Wrangle/St. Allias Park to hold captive moose calves for release later when more mature. He recommends that BBNA research what privileges or grants are allowable under ANILCA and seek cooperative agreements with other native organizations to implement. Conservation is the issue. Cooperatively, we should never say never and that our focus should be on a State Intensive Management Plan.

The Park Service responded that according to their mandate, they do not allow predator control. He disagrees with APHA's comment that they are uncooperative. A letter from the Department of the Interior dated December 19, 2006 states that it is Federal National Policy to not allow predator control programs on federal land. This is the last administration's interpretation. They have their mandate and have to comply with it; the change will have to come from Washington.

One resident asks if the Park Service representative if they would be in support of changing management the same or changing it?

The response was that it would be a lengthy process to change national policy.

Another Park Service person asked why aren't people hunting predators? There is no opposition in the Park. He asks how can we encourage participation that doesn't involve predator control? He has his own ideas....

A resident replies that with their subsistence lifestyle, they harvest everything to stay alive. They eat what they harvest; moose, caribou, belugas, seals, bears, etc. Over time people's preferences have changed. Many years ago there were no moose or caribou

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around so people harvested what was available. Now they prefer the taste of moose and caribou because those populations have established themselves and that's what they prefer to eat, very few people eat bear now.

Hans says that people have changed culturally; people do not pursue subsistence activities like before. They have a higher reliance on store-bought food especially when the moose and caribou populations are down. The subsistence lifestyle is going away.

NPS says that dynamics have changed. People are not utilizing resources as much as in the past. Changes in harvest patterns affect the balance of subsistence and more urbanized usage of foods. How can we regain that subsistence way of life again? He agrees that in some circumstances predator control can be important. He knows that it would be difficult to change the Federal Mandate. We need to have honest discussions on what is happening on the landscape. If we don't do Intensive Management, it doesn't make sense anymore to change harvest regulations. We need to encourage the public to harvest predators and suggests allowing cultural permits and community harvests. He thinks that the predator control concept is wrong.

Hans says that in discussions with staff and his research, he's found out that bears are by far the biggest problem in Unit 9 and probably the whole State. People don't realize it, but bears predate on moose and caribou far more than wolves do. He tells of wolf radio and satellite collaring projects in Unit 17 and elsewhere that indicate wolves are feeding on salmon during the summer and fall, spend a lot of time in the vicinity of beaver lodges and dams in the summer. Wolves are opportunistic hunters that also feed on ground squirrels, mice, and whatever they come across. Wolves are very territorial and for the most part, stay within the confines of their territory. He does admit that they also predate on moose and caribou but not to the level once thought by everyone. Research has shown that bears are the highest neonatal causes of moose and caribou mortality.

Hans asks OSM if they could give an opinion.

OSM response was that to put it into perspective is that it isn't that they won't do predator control; they cannot, under the Federal Mandate. She suggests that the Park Service could work with BBNA in sponsoring trapping clinics, engaging kids to get reconnected with their subsistence heritage, camp experiences to get them involved and more skilled and knowledgeable in hunting. In looking at the 2008 Federal Aid Annual Performance Report on bears she admits that bears are a big problem. Their agency encourages residents to harvest. She thinks that the Park Service could help out by building fish racks, meat houses, and such. Education is key especially when educating the public about bear safety.

One resident says that the Alaska Peninsula Corporation gives licenses to guides to hunt bears. They only have 3 or 4 clients hunting on private lands and need to find a way to get more participation.

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Another resident is thankful for BBNA's interest and effort to pull all the entities together. He appreciates the fact that more emphasis may be put on working together. They've experienced a lot of frustration in attempts in working with ADF&G and the different managing agencies in Unit 9 and feels better knowing that more collaborative efforts are underway. He thinks that more communities should get involved, it's all about communication.

Hans emphasizes the need to keep communication lines open and the importance of working together towards common goals.

BLM mentioned that they submitted a proposal for a Rural Education Program. This would work well in line with our attempts in educating and keeping the public informed.

A resident said that he supports the concept and that any program that helps a user group is a good way to go and thinks that it would have the Borough's support.

Another resident indicated that he understands the Parks position. He sees the Park's representative position and would rather have him managing the resource than someone in Washington DC. He is concerned about bear numbers. We will see a crisis if nothing is done. He would like to see something done sooner, not later after it's too late because everyone agrees that bear populations are exploding.

NPS commented that OSM changes in the last five years now allow a more liberalized sale of handicrafts. The sale of bear claws is controversial; it's ok on the Federal side but not in State regulations. Under State regulations they're more restrictive only allowing to sell other parts such as fur for handicrafts.

OSM comments that there are several issues. Technical Paper # 283 household surveys indicate illegal harvest of cow moose. There are habitat issues for caribou that will take many years for it to turn around.

This issue brought up a lot of caribou discussion on disease, range, nutrition, hunting regulations and effort, current management, etc.

BLM said that right now nutrition for the NAPCH shows that calves are nutritionally deficient with low birth weights and low recruitment. He points out a graph that shows one cow over its lifetime producing 210 decedents.

Again, discussion on educating the public, providing information, and the importance of bull/cow ratios.

NPS thought that regulations should be changed to allow only allow caribou cow harvest to improve the bull/cow ratio.

BLM again emphasizes the need to educate the public; he mentions a public relations project on the Seward Peninsula that was very successful.

APHA said that there are many issues that affect moose and caribou. Weather stress, predation, hunting pressure is changing moose behavior. In some parts of the State moose have changed their calving behavior by birthing above the tree line due to predation stress factor.

The USFWS thinks that the NAPCH decline is bottoming out. Currently the 2000 population estimate is a best guess estimate, not a survey. Currently, the herd has low calf/cow ratios with only 10.3 calfs/100 cows but is improving. They predict a decline over the next couple years and then a gradual recovery over time. It is uncertain how the predator component will factor in though to calf recruitment. To keep the herd stable they need 25 calves/100 cows. In a rebuilding mode, they would look for 40 calves/100 cows. He goes ahead and talks about wolf behavior. Wolves are very territorial and do not move out of their area. When prey moves out of their territories and if there is no food source, they will kill and eat each other to survive resulting in fewer wolves there.

Hans questions neonatal mortality and causes?

USFWS replied that cause specific mortality is limited to the first 14 days of life and improves after that. They figure the NAPCH has approximately 60% neonatal mortality with bears taking 40% and wolves taking 15%. After the first two weeks 50% of the caribou calves survive. Low pregnancy rates, low calf survival rates, and habitat issues contribute to population declines. He thinks that the cause of the NAPCH is more attributed to nutritional issues because of the caribou's poor health and low birth weights. So, it's reasonable to think that population declines were not predator driven, more likely nutritionally driven. Right now there is not much lichens on the range from overgrazing and will take a long time to recover.

#### 7. Future meeting dates

Everyone thought this was a good and productive meeting by all. Hans will submit his report to the BBNA Board and through their recommendations he foresees a potential working group formation made up of representatives from different agencies, organizations, local representation, and others. He thinks that the working group formation and meetings will most likely happen in the fall after school starts and after the hunting season when everyone are more available.

#### 8. Adjourn

Meeting adjourned at 4:50 p.m.

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## Bristol Bay Moose and Caribou Enhancement Project Bristol Bay Native Association

### Results of King Salmon Meeting April 22, 2009

I was hired by BBNA by contract for services to address the declining moose and caribou populations in Bristol Bay effective February 23, 2009 through April 30, 2009.

The scope of work included scheduling of meetings, identifying which State and Federal agencies to participate, contacting all village councils for representatives, land owners and others to attend, and bringing those stakeholders together at a place convenient.

As per the conditions of the contract I was able to work out of my home in Wasilla as well as a place provided by BBNA when I was in Dillingham. During the course of this project, contacts to stakeholders were either made by fax, phone, or electronic communication through the Internet.

I decided that since Bristol Bay was such a large area with two Game Management Units, I would hold two separate meetings; one in Dillingham for Unit 17 and one in King Salmon for Unit 9. These meeting places are centrally located with dining and lodging facilities convenient for anyone traveling in.

Agreeing on a time convenient for everyone was my first challenge. Due to the game managers activities in the spring doing moose and caribou census counts, as well as their other management schedules, and their budgetary commitments for aircraft and helicopter contracts, they gave me a commitment for an April 22 meeting date.

Once the meeting date was established, I sent out invitations to ADF&G, USFWS, the Lake Clark National Park, Katmai National Park Service, Office of Subsistence Management, Bristol Bay Regional Advisory Committee, BLM, all village councils in Game Management Unit 9, and the Alaska Professional Hunters Association.

I traveled to Dillingham on April 15 to work out of the BBNA office. Later the next week I traveled to Naknek by personal aircraft on April 21 to be there early the next morning to prepare the meeting location. The meeting was to start at 10 a.m. at the King Salmon Village Council Building.

The April 22 meeting attendees included Bill Schaff and Dom Watts, USFWS Becharof Refuge; Chuck Ardizzone, and Donald Mike, Office of Subsistence Management; Mary McBurney, Sandy Rabinowitch, National Park Service Anchorage; Joel Hard, National Park Service Lake Clark; Troy Hamon, National Park Service, Lake Clark; Geoff Beyersdorf, BLM; Bobby Fithian, CEO Alaska Professional Hunters Association; Fred



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Pike, Naknek/Kvichak AC; Randy Alvarez, BBRAC Chair; Tim Enright, Ugashik Village Council representative; and local resident participants Pete Hill, Richard Wilson, Pete Caruso, Dale Myers, Kathleen Myers, and Eddie Clark.

ADF&G was invited but did not attend. Communication with game biologist Lem Butler by e-mail and phone was unproductive as I did not receive responsive communication or any commitments from him. It is understood that he has taken a job out of the Juneau office. I did receive one e-mail notice from him indicating where I could find the latest management information on the Internet.

The draft meeting minutes are provided for reference in Tab 5 of the supporting document binder for Unit 9.

It was unfortunate that ADF&G was not there to provide the most up-to-date population estimates and harvest information and trends. Most agencies indicated that they relied on ADF&G for population numbers.

#### Unit 9 Moose

**Background:** Moose were scarce on the Alaska Peninsula before the mid 1900's, but they increased dramatically and spread southwest during the 1950's and 1960's. The scarcity of suitable habitat south of Port Moller limited expansion into Unit 9D. Even during the 1960's when the population was growing, calf/cow ratios were relatively low, and the ratio declined as the population reached its peak. Evidence of range damage from over browsing was evident and nutritional stress probably caused poor calf survival. Liberal hunting regulations were in effect from 1964 to 1973. Even though a series of hunting restrictions began after 1973, the population continued to decline, especially in Unit 9E. By the early 1980s moose densities in Unit 9E were 60% below peak levels and calf/cow ratios were extremely low despite evidence that range conditions had improved. Brown bear predation on neonatal moose was the primary limiting factor of moose in Unit 9.

Poor weather conditions and inadequate snow cover frequently limit moose surveys in Unit 9. With trend areas being surveyed infrequently and with moose movements adding variability to survey results, population estimates are hard to come up with. Comprehensive population information is estimations based mainly from trend count areas and estimation of moose per square mile or kilometer.

Results of fall sex and age comparison surveys indicate that populations in most of Unit 9 have been relatively stable over the last 25 years. Local residents question this as some communities have difficulty harvesting moose for their subsistence needs. Moose densities remained very low in Units 9A, 9D, and the southern portion of 9E. In March 1999, the board of Game found that moose in Units 9B,C, and E met the criteria to be considered "important for providing high levels of human consumptive use" under the State intensive management law.

A 1983 census in the central portion of Unit 9E resulted in an estimate of 1148 moose. Extrapolation of this census to the remainder of Unit 9E provided a rough estimate of 2500 moose. The area of 9C outside of Katmai National Park had approximately 500-600 moose. There were approximately 2000 moose in Unit 9B. Units 9A and D probably contained about 300 and 600 moose respectively. Add them all up and the population estimate then was 5900-6000 moose. Lem Butlers power point presentation to the Board of Game during their March 2009 meeting gave an estimation of 8000 moose in all of Unit 9. This raised a few eyebrows as there has been no census counts since the partial census in 1983. Lem's estimations were extrapolations from trend area counts and estimations on carrying capacity on range habitat.

Bull/cow ratios appear to be relatively low to stable but meet management objectives to sustain the population.

Reference to ADF&G Technical Paper #283 indicate that actual moose harvest could be a lot higher once household harvest information is figured in. Managers are concerned about out of season and cow harvest reported from communities in Unit 9. Since 2000 approximately 89% of the moose harvest occurred in September. Harvest levels during the winter season, which depend on, weather and travel conditions, and have remained low and ranged from 7-16% of the total harvest.

Moose calf production and condition appear to have improved since the 1960s and 1970s, but calf recruitment has remained low. Bear predation of neonatal moose appears to remain the primary cause. Bear/moose ratios in Unit 9 ranged from >1:1 to 1:10, and they were much higher than anywhere else within the indigenous range of moose.

ADF&G reports indicate that compared to other units statewide, harvests in Unit 9 have remained relatively stable for the past 20 years, despite major changes to moose regulations. Reduced harvests since 2000 reflect changes in the number of moose hunters in Unit 9 and coincided with reduced opportunity to hunt caribou in portions of Unit 9. Changes in the number of moose taken have resulted from decreased effort and do not indicate differences in the moose population.

Brown bear predation on neonatal moose was the major limiting factor preventing an increase in moose densities in Unit 9, followed by the harvest of cows in some areas. However, the very high bear/moose ratios would require substantial reduction in bear densities to achieve a measurable improvement in moose calf survival. ADF&G has placed a priority on managing bears in Unit 9, and any drastic reduction in bear numbers would probably be opposed by a large segment of the public.

Local residents attending the meeting agree that bears are increasing in number and increasingly cause problems at fish camps, lodges, within communities, and that they prey on game species that they rely on for subsistence. Bears are bolder and have lost their fear of man. They are also concerned about safety and wonder why nothing is done to control the increase in bear numbers throughout Unit 9. Bears are more of a problem than wolves and control measures need to be implemented sooner rather than later after

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prey specie populations decline. They are fortunate to still have moose hunt opportunity, but no longer are able to hunt the Northern Alaska Caribou Herd because their populations declined to a point that managers closed the hunt on both Federal and State lands. The herd is still declining even though hunting was reduced through reduction of bag limit, Tier II, and continuing to decline even after a total closure of the hunt. Current moose population estimates are just that. ADF&G has composition counts in portions of sub-units but no thorough census counts since 1983. Pooling of resources and monies should be a high priority in Unit 9 to establish moose population numbers so that they could be better managed.

Most recent Board of Game action modified the winter moose bag limit to one antlered bull in Unit 9.

#### Northern Alaska Peninsula Caribou Herd

The Northern Alaska Peninsula Caribou Herd ranges throughout Subunits 9C and E. Historically, the population has fluctuated wildly, reaching peaks at the turn of this century and again in the early 1940's (20,000 caribou). The last population low was during the late 1940s (2000). By 1963 the herd had increased to more than 10,000 animals. The first radio telemetry-aided census in 1981 estimated 16,000; by 1984 the herd had increased to 20,000.

During the next several years, the noticeable depletion of lichens and movements across the Naknek River were evidence the traditional wintering area was overgrazed. NAPCH animals began wintering between the Naknek River and Lake Iliamna, and there was reason to believe that excellent forage conditions in this region would sustain the NAPCH within the population objective of 15,000-20,000 animals. However, up to 50,000 Mulchatna caribou also began using this areas at about the same time, as the herds intermingled near Naknek and King Salmon. Given the increasing competition for winter forage, by the late 1980s it was decided that the NAPCH should be managed at the lower end of the management objective of 15,000. During the 1993-1994 season, the record harvest of 1345 caribou and natural mortality estimated at >30% combined to reduce the NAPCH to 12,500 by June 1994. The herd continued to decline through 1999. In response to increasing concern, the Board of Game evaluated intensive management options for this population and concluded no viable solutions existed to alter the status of this herd. A Tier II hunting program was instituted the same year to manage human harvest. Since 1999, the herd has continued to decline, and indications of nutritional limitations are evident.

A composition survey of the NAPCH was conducted on October 15 and 16, 2008. The low calf/cow ratio (10.3 calves/100 cows) observed in the fall is typical of the calf recruitment observed in this herd during the past 6 years and is considered very low for a caribou population. The herd is expected to continue its decline because of low calf/cow and low bull/cow ratios. The current bull/cow ratio (19 bulls/100 cows) is now below the management objective of 20 to 40 bulls/ 100 cows.



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Surveys to estimate population size have not been conducted for several years. Based on the number of caribou observed during the composition surveys in October, the NAPCH contains a minimum of 2,000 caribou and is still declining.

Mortality studies conducted in June 1998 (Sellers) and the results of the 2005-2006 calf mortality study in Butler et al. 2006 indicate that during the 1998 study, 35% of radio collared calves (n=37) died during the first month of life. Predators, primarily brown bears, bald eagles, and land wolves caused most of the mortality of calves < 2 weeks old, but disease apparently was an important mortality factor in calves > 3 weeks old. During the 2005-2006 study, 57% of the radio collared calves died during the first 2 weeks of life, primarily due to predation by wolves and brown bears. Calf mortality remained high between two weeks and two months of age (67% mortality) though the cause of the late calf mortality is unknown. Evidence that large predators were present at mortality sites was found, but scavenging could not be distinguished from predation due to the large time interval between calf mortality and site investigation, typically over one month.

Presently calf/cow ratios remain at an all time low. By comparison, calf birth weights are lower and body size indexes are smaller than the transplanted NAPCH on the Nushagak Peninsula. The NAPCH continues to decline and productivity and survival remain low. In 2005 a herd health assessment identified heavy parasite loads, the presence of bovine respiratory disease complex, poor immune response, low levels of micronutrients, and chronic dehydration in animals examined. An experimental study to investigate the effects of parasite removal on body condition and calf production was initiated in 2005 and results are expected soon.

In response to the continued decline of the herd, managers closed hunting of the NAPCH in 2005 with no intentions of reopening the hunt until the herd begins to recover. Biologists reevaluated intensive management options for this population in 2004 and concluded that no viable solutions existed to alter the status of this herd. Since 2004 surveys have continued to indicate a declining population suffering from low productivity, low survival and low calf recruitment.

Most recent Board of Game action was to close caribou hunting in Unit 10. All of the predator control proposals presented did not pass with the exception of proposal 65 that was amended to establish a predator control area for wolf in Unit 9D and E. The plan will be reviewed at the statewide 2010 meeting.

#### Mulchatna Caribou Herd

Between 1981 and 1996, the Mulchatna Caribou Herd increased at an average annual rate of 17%. From 1992 to 1994, the annual rate of increase appeared to be 28%, but this was probably an artifact of more precise survey techniques. The dramatic growth of the herd is attributed to a succession of mild winters, movements into previously unused range, relatively low predation rates and an estimated annual harvest rate of less than 5% of the population since the late 1970's. From 1996 through 1999 no herd size information was available. The summer 1999 photo census indicated the herd had declined from the peak,

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which probably occurred in 1996 or 1997. Subsequent photo censuses indicate the herd has continued to decline.

The minimum post-calving population estimates increased from 18,599 in 1981 to 200,000 in 1996 and declined to 45,000 by summer 2006. The herd continued its decline with the latest 2008/2009 pooling data from surveys conducted October 2008 indicating a population of approximately 30,000. It is commonly felt by ADF&G and USFWS agencies that the dramatic herd growth peaked and then declined because of overgrazing of their range. The MCH sought out new range as the herd dispersed looking for new food sources. During the last 25 years, the MCH has made dramatic changes in its range. In the early 1980's, the herd spent most of the year east of the Mulchatna River between the Bonanza Hills and Iliamna Lake. Its range now encompasses more than 60,000 square miles. The MCH continues to present new management challenges as its size and range change. Since the main portion of the herd is migratory and uses areas from the western slopes of the Alaska Range to the Kuskokwim River found in Game Management Units 9, 17, 18, and 19. It seasonally occupies ranges used by smaller resident caribou herds. Predator populations of both bear and wolves also grew significantly during this timeframe because of the availability and plentiful food sources of moose, caribou, and salmon.

Today predator populations are very healthy with local residents, hunters, and managers agreeing that there are no shortages of them. Hunt activity varies from year-to-year. Local residents depend on good snow cover to hunt and trap utilizing snow-machines for transport. This method is more effective than trapping and usually results in higher harvest numbers. Hunting of bears show that the majority of brown bears are taken by the guided sport industry. Subsistence harvest is limited because people do not utilize or consume brown bear meat much as in the past.

Hunt restrictions for the MCH were initiated when the herd continued its decline. In the 1980s and into the 1990s hunters were allowed to harvest 5 caribou with the season date of August 1 to April 15. Today the resident season ends on March 15 and harvest is limited to 2 caribou of which only one bull may be taken prior to January 1. The non-resident season was reduced to two weeks and then eliminated by Board of Game action during their February/March 2009 meeting. The Intensive Management population objectives were changed from a 100,000-150,000 range to 30,000-80,000. The harvest objectives were changed from a range of 6,000-15,000 to 2,400-8,000. Even with past board action of restriction of bag limit and season, the herd continued its decline. The Board has decided that the MCH will be managed as a whole throughout its range across multiple Game Management Units.

The latest composition counts indicate that calf/cow ratios of 23.4 calves/100 cows are low, but improving as older age class cows are dying off and younger cows taking their place. Bull/cow ratios are still low with composition counts indicating 19.3 bulls/100 cows.

Most recent Board of Game action closed the non-resident season in Units 9, 17, 18, 19 and will manage the herd as a whole throughout their range.

#### Brown Bears

The Alaska Peninsula is a premier area for large brown bears, and the Board of Game has placed a high priority on maintaining a quality hunting experience for them. An intensive study was conducted during the early 1970s near Black Lake in the central portion of Unit 9E. Three hundred and forty-four bears were captured and marked during 1970-1975 to acquire information on reproductive performance, movements, and harvest rates. More recently, efforts have been directed at further analyzing the data from this study to better understand the population dynamics of an exploited bear population. In 1988 an interagency study was initiated at Black Lake to assess the current status of the bear population (Sellers and Miller 1991, Sellers 1994, Miller et. al 1997) and to make comparisons with conditions in the early 1970s.

High harvests coincided with poor salmon escapements in most drainages in 1972 and 1973, which indicated that the bear harvest needed to be reduced. Harvest statistics and high percentage of marked bears killed in the Black Lake area also supported the conclusion that a harvest reduction was needed. Emergency hunting closures were declared for all of Unit 9 in the spring of 1974 and for the central portion of the Alaska Peninsula in spring of 1975. At the spring 1975 Board of Game meeting, the present system of alternating seasons (open in the fall of odd-numbered years and the spring of even-numbered years) was adopted to keep harvests within the quota of 150 bears per year for the area south of the Naknek River. This system reduced harvests substantially from 1986 to 1981 and allowed the bear population to recover. The 150 bear harvest quota was abandoned in 1984 south of the Naknek River and endorsed more flexible objectives.

In the fall of 1988, the Alaska Supreme Court ruled the exclusive guide area system unconstitutional. This allowed the number of unregistered guides operating in Unit 9 to increase; however, federal land management agencies limited the number of commercial-use licenses available to new guides on federal lands. With approximately 75% of the Unit 9 harvest coming from guided hunts, stability in the guide industry is a key part of the management program.

Current management objectives is to maintain a high bear density with a sex and age structure that will sustain a harvest composed of 60% males, with 50 males 8 years or older taken during the combined fall/spring season.

Bear-human conflicts continue to be the most serious and intractable problem in Unit 9, as in many other parts of the State. At the most recent March 2009 Board of Game meeting in Anchorage, Myra Olson's testimony included a statement that she had a sign on her door leading outside that read, "Welcome to the food chain, you are part of it". This exacerbates the feeling in villages on Unit 9 about bear numbers and safety within the confines of their own villages.

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Brown Bears do not lend themselves to convenient methods of monitoring trends in density or composition. ADF&G estimates that in 2006 the bear population exceeds 6000 animals in Unit 9 open to hunting. Estimated DLP kills are in the neighborhood of 50 bears. The annual rate of human caused mortality is estimated now at 6%.

ADF&G staff reports indicate that even though brown bears are the highest cause of neonatal mortality for moose calves, they do not think that they prey on caribou calves in significant numbers.

Lem Butler reports that research at Black Lake showed that a relatively small percentage of radio collared bears made any use of the NAPCH's primary calving grounds during spring. He feels that an indiscriminate reduction of the brown bear population in 9C and 9E would realize little reduction in caribou mortality. He does not recommend targeting brown bears in any portion of Unit 9 for reduction to benefit caribou or moose populations. Local residents at the April 22 meeting disagree with Lem's report and say that reductions should be made to improve calf survival and rebuild prey species in all of Unit 9.

Caribou in Unit 9 is below the intensive management population objective. Although moose population estimates are unverifiable, staff reports indicate that they are within management population objectives. Predators that prey on moose and caribou continue to be the primary factor in the NAPCH decline and contributors to low calf survival rates for moose and caribou.

It was unfortunate that ADF&G was not at the April 22 King Salmon meeting to present the most current population and harvest estimates and provide more accurate up to date information on current trends and predator information. We had to rely on the most current information 3 to 4 years old from the ADF&G website.

#### Wolves

Wolves are found throughout the Alaska Peninsula (Unit 9) in low to moderate densities. Specific data on historic wolf abundance are lacking, but the population was reduced by wolf control work during the 1950's. After the end of the federal wolf control program, wolves increased and thereafter were primarily affected by prey abundance and periodic outbreaks of rabies. Conditions favorable for land-and-shoot hunting and ground-based trapping have been rare over the past 25 years, so harvest have relatively little influence on wolf numbers.

Prey abundance has varied during the past 50 years. Moose densities increased during the 1950s and 1960s and then decreased during the 1970s in all areas north of Port Moller. Moose numbers have been relatively stable during the past 20 years. The Mulchatna Caribou Herd increased from about 14,000 in 1974 to over 200,000 in 1996, declined to 85,000 by 2004, then declined more to a reported 30,000 in 2008. The NAPCH increased from about 13,000 in the mid 1970s to about 20,000 in 1984. During the next 10 years the NAPCH remained relatively stable at 15,000-18,000. By 2005, the

herd declined dramatically to about 2500 and estimates for 2008 indicate a population of less than 2000.

Management objectives were to maintain a wolf population that would sustain a 3-year average annual harvest of at least 50 wolves. The department was unable to measure whether or not they were meeting the objective given that limitations imposed by climate and budget. By piecing together observations of wolf packs and general knowledge of territory size, the department estimates that Units 9 and 10 contain approximately 350 wolves. It is a conservative estimate, but cannot be refined without considerable expense and would require good snow cover to accomplish.

Wolf numbers appear to have increased throughout Unit 9 despite the decline of the NAPCH since 1993. Although relatively few trapper questionnaires have been returned in recent years, trappers generally agree that wolf abundance has increased during this reporting period. Wolf harvest in Unit 9 varies widely, depending on weather conditions and the activity of several individuals who use aircraft. Harvest has had little effect on the wolf populations.

At the March 2009 Board of Game meeting in Anchorage, the Board established a predator control area for wolves in Units 9D and E and instructed the Department to draft it for their review at the 2010 Statewide meeting. The board also extended the wolf season to May 25.

Wolf control continues to be the most debatable and controversial subject at the BOG meetings. The lack of information on population and predator/prey relationships affect the outcome of decisions on predator proposals at the BOG level.

Issues brought up by meeting participants:

- Need to do moose, bear, wolf census
  1. It's been quite a while since a credible moose census was taken (1983). The department has done habitat assessment work and composition surveys but has no reliable population estimates. During the Board of Game meeting in March 2009, Lem Butler reported that he estimates 8,000 moose in Unit 9. He extrapolated these numbers from carrying capacity and composition surveys. The park service and refuges have their own estimates for their management areas but mainly rely on ADF&G.
  2. Lack of population estimates and other information at the BOG meetings handicap the board from making sound judgments.
  3. Effects of predator populations affecting herd dynamics need more work.
- Lack of predator control
  1. Bear populations are increasing dramatically in Unit 9 as well as in other parts of the State.

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2. Bears are the primary cause of neonatal mortality of moose calves in Unit 9. Locals question the department's position indicating that the bears do not contribute significantly to caribou calf mortality.
  3. Safety is a continuing concern and is exacerbated as bears are bolder and their presence within communities continue to grow. Residents are concerned about children's safety.
  4. Federal managers indicate they cannot do predator control because of their "mandate". Changes would have to be made in the Federal Register. It would be a lengthy process.
  5. Predator control programs in the State are controversial and cost the State a lot of money defending and implementing. We are fortunate to have a governor and board that support predator control. Again, lack of credible information prevents or handicaps decision-making.
- **Wolves**
    1. Any predator control program is politically charged and controversial.
    2. BOG approved 9D and 9E for predator control area to be reviewed at their 2010 statewide meeting.
    3. Wolves prey on moose and caribou, increasing mortality.
    4. There is no accurate population estimate.
    5. More radio or satellite tagging projects is needed.
  - **Brown Bears**
    1. Bears are the primary cause of neonatal mortality for moose and caribou calves.
    2. Bear populations are increasing dramatically due to reliable food sources. (Healthy salmon runs, availability of moose and caribou, and other food sources).
    3. Unit 9 is managed primarily for bears, all other species are secondary. Locals feel that this needs to be changed to establish management priorities for caribou and moose. My recommendation is that changes to Alaska Statute are necessary at the legislative level and the "Working Group" could address this.
    4. Bear predation on moose and caribou affect herd dynamics.
    5. Radio or satellite collaring could help with information gathering.
    6. How to encourage the taking of bears is difficult because people just don't use bears like they used to.
  - **Subsidy Program to reward hunters**
    - 1: The group was interested in the "subsidy concept" to assist hunters and trappers with costs associated during the course of harvest.
    2. Similar to Frank Woods, BBNA concept in his February 2008 report to the BBNA board. Could be worked on and improved. BLM indicated that there were similar programs in Interior Alaska that worked well.
    3. Hunter and trapping clinics to train to improve harvest success.
  - **Lack of information on predator species**

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1. Everyone agreed that bear and wolf issues needed addressing.
  2. Looking for funding sources for information gathering research projects could be accomplished through pooling of multi-agency monies, or to seek out new funding opportunities through legislative budget requests.
  3. Predation on prey species affects the dynamics of game populations and more research is needed for better understanding.
- Unwillingness of department/service to work with LAC and locals
    1. Local representation at the meeting expressed frustration with the department and service for not working with them. I detected a lot of animosity between the managers and local representation. Focus on this issue is important to improve relationships with the LAC and other organizations in Unit 9.
    2. Fostering better relationships between agencies and local representation through public relationship efforts is encouraged. BLM offered their expertise as they do that sort of work in other parts of the State.
  - Moose populations do not provide adequate subsistence opportunity
    1. Locals feel that the guide industry competes directly with the subsistence hunter. Hunters especially in Unit 9E feel that their subsistence needs are not being met.
    2. Population census work needs to be accomplished to substantiate intensive management criteria.
    3. Predator impact affects prey reproduction and survival.
  - No hunting of caribou
    1. USFWS reported that cause specific caribou mortality is limited to the first 14 days of life and improves after that. They figure the NAPCH has approximately 60% neonatal mortality with bears taking 40% and wolves taking 15%. After the first two weeks 50% of the caribou calves survive. Low pregnancy rates, low calf survival rates, and habitat issues contribute to population declines. They think that the primary cause of the NAPCH decline can be more attributed to nutritional issues because of the caribou's poor health and low birth weights. USFWS think that the primary population decline is more attributed to nutritional and health issues as caribou are carrying high parasite loads, nutritionally deficient, bovine respiratory disease complex, poor immune response, low levels of micronutrients and chronic dehydration. They feel predation effect is secondary. Right now there is not much lichens on the range from overgrazing and will take a long time to recover.
    2. Locals say that they have lost subsistence opportunity. Even when Tier II was implemented and a total closure of hunting of the NAPCH, they have a higher dependence on moose. Moose are difficult to come by because in some locations in Unit 9 moose densities are low and that competition with the sport industry prevents them from meeting subsistence needs.

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3. Locals question why wasn't something done sooner? Hunting was closed but the herd still continued to decline. They feel that the predator issue should have been addressed.
- How to improve caribou populations
    1. Habitat and range conditions in Unit 9 affect the overall health of caribou.
    2. Current efforts to inoculate caribou to improve overall health could be expanded if preliminary work is successful.
    3. Over browsing and condition of range could be difficult to address and options could be explored.
  - Competition for game from guided sport sector
    1. Locals are complaining that the guides are competing with them. Since they have the capital and resources at their disposal, locals cannot harvest what they need.
    2. Review letters from Port Heiden and Patrick Kosbruk of Perryville.
    3. Phone discussion with several residents in the Chigniks indicates that guides take a lot of moose on State land.
  - Multi-agency collaboration
    1. Habitat assessment research for caribou
    2. Pooling money on cooperative projects
    3. Improvements to MOAs between agencies for projects.
    4. Work with LAC, village councils, landowners, and other organizations in Unit 9.
  - Federal mandate to manage for abundance
    1. Change should be considered at the Federal level to allow predator management.
    2. Managers are sympathetic but their hands are tied.
  - Unit 9 is managed for bear priority
    1. Changes should be made in Alaska Statute at the legislative level to change priority for intensive management of moose and caribou.
    2. Unit 9 has what I would call an overabundance of predators. Current estimates indicate that there are more predators than prey species. Reducing those numbers is important to maintaining and increasing prey populations. It will most likely receive disapproval from the guiding sector and possibly from management. Residents feel that subsistence opportunity is lost because they've lost hunt opportunity for caribou and moose-hunting success is limited.
  - Land and shoot
    1. Aerial and land and shoot methods of harvesting wolves was the most effective method of harvesting and controlling wolf populations. Once ballot

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- initiatives were passed outlawing the practice, wolf populations increased dramatically.
2. With the adoption of a predator control area in Unit 9D and E, hopefully the BOG will approve a plan to control wolf populations.
  3. Land and shoot programs in other parts of the State have been successful. The Southern Alaska Peninsula Caribou Herd indicates that calf mortality is improving with higher calf/cow ratios.
  4. Other programs in Alaska are successful with positive results to prey species.
- **Public Relation Work**
    1. BLM and Federal agencies indicate that trapping clinics were successful in training new participants and improved success rates for local trappers in other areas. Could work here too. They were willing to sponsor programs and work with BBNA and other agencies to promote.
    2. Hunter training- Worked well in other parts of the state.
    3. All meeting participants agree that subsidy program options to take predators should be encouraged and explored.
    - 4.
  - **Community harvests and designated hunters**
    1. Staff feels that initiating a program that would authorize community harvest quotas and have designated hunters would allow for better management of resources.
    2. Locals say that it wouldn't work here, too many variables.
  - **Subsistence lifestyle being lost.**
    1. Cultural aspect lost
    2. Whole generations that have not experienced the "Hunt". They do not know how to butcher an animal or how to take care of it.
    3. A greater reliance of store bought foods.

In conclusion, everyone thought that this was a good and productive meeting. They are appreciative that BBNA has taken the initiative to address issues in region and to bring everyone together. Most expressed frustration with process as game managers hands are tied when it comes to managing predators.

Predators are by far, the primary issue especially with brown bear populations growing unchecked. Caribou repopulation may take time to recover due to carrying capacity on range that has been overgrazed, health issues, predation and is most likely to continue declining even further. Current moose population estimation numbers are questionable and conducting a moose census in Unit 9 should be of high importance. I believe the last one was done in 1983. Wolves continue to be the controversial issue but according to staff reports, bears have made more of an impact on prey populations. Changing the primary focus game management in Unit 9 should be addressed to make moose and caribou the primary management focus instead of bears. The working group can work with the legislature and game managers to address that issue.

Credible peer reviewed data gathering is important if it is to be presented to the Alaska Board of Game or the Alaska Federal Subsistence Board during the course of deliberating on various game proposals. Agencies are willing to work with BBNA towards collaborative multi-agency projects and information gathering. Other measures to improve browse or range and increase prey populations can be explored by the working group once they meet and take further action.

Future meetings will be at BBNA's discretion. If additional meetings are approved, I would suggest to start planning early fall with a meeting schedule to start right after school starts and after the moose hunting season. In my opinion, this would offer not only an earlier start, but would give opportunity for those to participate prior to the busy meeting schedule that occurs later in the winter.

Hans Nicholson  
5161 E. Shennum Dr.  
Wasilla, Alaska 99654  
907-376-2992  
hnychs@bbna.com

34.

# **BRISTOL BAY MOOSE AND CARIBOU ENHANCEMENT PROJECT**

## **FOLLOW UP MEETING**

**PORT HEIDEN VILLAGE COUNCIL BUILDING**

**PORT HEIDEN, ALASKA**

**6:00 PM, January 10, 2011**

### **DRAFT MEETING REPORT**

#### **1. Welcome and Stated Purpose of the Meeting**

Joe Chythlook, Facilitator, who is doing contract work for Bristol Bay Native Association (BBNA), Natural Resource Department, welcomed the invited participants to a follow up meeting of the Bristol Bay Moose and Caribou Enhancement Project meeting that was held in King Salmon, Alaska by Hans Nicholson, a 2009 hired contract worker for BBNA. The purpose of this meeting was to update the participants of what happened at the previous meeting. The conclusions stated by Hans from that meeting were prepared in bullet presentation form and were shared with those present. The agenda called for discussion of these points later on in the meeting and to decide how to further develop the project before the upcoming March 4-10, 2011 Board of Game meeting in Wasilla.

#### **2. Introduction of the Participants**

Those who signed in at the meeting and who attended all or part of the meeting Included: Joe Chythlook, BBNA; Frank Woods III, BBNA; Lem Butler, ADF&G, WC; Dan Kingsley, Pilot Point; Tim Enright, Ugashik; Maurice Enright, Ugashik; Scott Anderson, Port Heiden; Charles O'Domin, Chignik Lake; Jerry Kalmakoff, Chignik Lake; Dennis Matson, Pilot Point; Diane Christensen, Port Heiden; Emil Christensen, Port Heiden; Patrick Kosbruk, Perryville; Mark Kosbruk, Sr., Port Heiden; Fred Shangin, Chignik Lake; Tom O'Domin, Chignik Lake; Jim Masek, Port Heiden; and Bobby Christensen, Port Heiden.



35.

### 3. Discussion of Hans Nicholson's Conclusions

Joe Chythlook read the prepared conclusions from Hans Nicholson's April 22, 2009 meeting regarding Unit 9 moose and North Alaska Peninsula Caribou Herd. (Please refer to the enclosed prepared list.)

Some of the highlights on moose information suggested that brown bears have become the primary limiting factor on the population growth in Unit 9. The latest information on hand was several years old. The very high bear/moose ratios would require substantial reductions in bear densities to achieve a measurable increase in moose calf survival. However, since ADF&G places a higher priority for managing for brown bears in Unit 9, any drastic reduction in their numbers would probably be met with opposition by a large segment of the public. Nevertheless, the local residents who attended the King Salmon meeting agreed that bears were increasing in numbers and were causing more problems at fish camps, lodges, and local villages and are preying on game species that local folks rely on for subsistence food. The consensus is that bears are more of a problem than wolves and control measures need to be implemented sooner than later.

Than the most recent NAPCH composition survey indicates low calf/cow ratio (10.3 calves for 100 cows) and is considered very low for a caribou population. In the last BOG meeting in 2009, most all of the predator proposals failed except for proposal 65 which was amended to establish a predator control area for wolf in Subunits 9 D & E. That plan was to be reviewed in the following statewide meeting in 2010.

### 4. Update of Upcoming Board of Game Meeting

A brief update was given for the Unit 9 and 17 Board of Game meeting which will take place in Wasilla, March 4-10, 2011. BBNA plans to help tribal members with travel to attend the meeting.

### 5. Comments from Participants

The participants were asked to comment and to express their views on the above mentioned conclusions. Most of the views expressed by the local attendees agreed with the shared conclusions regarding brown bear predation and problems described by Hans Nicholson.

Bobby Christensen, a resident of Port Heiden, and a long time member of the Lower Bristol Bay Fish and Game Advisory Committee, agreed that there were too many brown bears in their area and village. He was frustrated that the local residents had not been able to do much about the problem bears under the existing regulations. He mentioned

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that they were "afraid to shoot the bears" because of the amount of work and follow up involved just to get rid of the problem bears. (ie: report the kill, skin the bear, and take the skull and hide to the department & etc.) Bobby thought the bears must be having a big negative impact on the moose and caribou in the area. He wondered about the most recent count of caribou in Unit 9.

Lem Butler, ADF&G, WC, Biologist, mentioned that they had done some surveys of the NAPCH in 2009 and 2010, and the bull to cow ratio had improved from 25 bulls to 100 cows to 35/100. And the calf to cow ratio was around 25/100, which was considered to be healthy. The total number of caribou from King Salmon to Port Mollar was around 2000. The bulk of the herd was near King Salmon at around 1500. The NAPCH calve around the 28<sup>th</sup> of May. The big issue before any thought of doing any predator control program was the vast of amount Federal lands in this area.

Bobby thought that they needed to write letters to the Game Board and to the ADF&G describing the needs of the 100 or so local Port Helden residents for red meat. He thought that a tier II hunt or something like that should be developed just for the elders in the area.

Frank Woods suggested that a letter from all the local village corporation land owners and village tribal offices would also help. They needed to address the letter to the Commissioner of Fish and Game and the Director of Division of Wildlife Conservation.

Tim Enright, a resident of Ugashik, and also a member of the Lower Bristol Bay AC, mentioned that they have been discussion this problem and issue for the last six years or so. He thought part of the problem was that local land owners were not willing to get involved. He mentioned that he had brought the issue up at the Alaska Peninsula Corporation Board meeting several times to no avail.

Lem mentioned that management of the game resources in the area was complex. And there have been attempts by all to address the issue through several Board of Game cycles. There are proposals to address it again in March. He also shared that the Department had done some moose surveys in 2010. The survey revealed 60 bulls to 100 cows. The calf to cow ratio was not as great at 25/100. The current moose population numbers are about half of what they were in the 1970s.

Bobby mentioned that the local hunters were not feeding their families. He thought this was not right. He has gotten his moose from the up the Aleknagik area for the last couple years.

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Frank reminded the folks that since there was a lot of Federal land in Unit 9, the Federal Subsistence Board should be pushing hard for subsistence moose and caribou hunting in the area. He shared that he had heard from Unit 9B residents that someone got their first moose near one the villages in three years. Local area residents are just not getting their moose and caribou. So He agreed with Bobby and expressed that something has to be done.

Patrick Kosbruk, a Perryville resident and member of their village corporation, asked about where the majority of the hunting for moose was taking place. Lem apprised the audience that 80% of the moose was harvested from Federal lands and 20%, or the rest, from State lands. And most of the hunting was done by registered guides which were given hunting areas by zip codes. Patrick expressed that something was wrong with the process of dealing with the problems expressed concerning bears. He also wondered what the State was doing about it. Lem mentioned one idea was to put people from the agencies involved in areas where local people are having a hard time to help them deal with it. However, he also mentioned that there had been a decrease in non local hunters as well.

Both Patrick and Frank thought one way to address this would be to start using local village corporation land as an access tool. Local people needed to be educated on the process this could work. Frank agreed limiting access to village corporation land, which was selected because of its high local subsistence use, could be used as a tool to ensure local harvest some of the local moose and caribou for the villages in the area.

Joe Chythlook mentioned that new moose management plans have been developed in recent years in other GMUs to address some of the concerns expressed by the people present. Unit 17A Moose Management Plan and the Unit 18 Moose Moratorium were given as examples of how this may work in parts of subunits of GMU 9 to develop some moose enhancement plans in the areas that needed the most. Quite a bit of discussion followed, but no action was taken. But the idea was well received and suggestion was made that this could be discussed with residents of Unit 9B sometime in the near future. Frank and Joe are planning to meet with those folks in February.

Tim Enright and Dan Kingsley, Chairman of the Lower Bristol Bay AC, shared stories of their attempts to hunt moose in the Ugashik area, particularly within the Ugashik Lake, where they thought there were 100 bears to every moose they saw. They were not successful for they only saw cow moose which they suggested were being chased around by the brown bears in the area. Tim said they certainly needed to get rid of more bears.

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38.

Lem mentioned there were some proposals to address moose and bears in Unit 9 C & E which will be addressed by the BOG in March. Proposal 17 was on moose and Proposal 114 was for brown bear. However, in the interest of time, the participants pointed out that these proposals, along with others, would be discussed and acted on by the Lower Bristol Bay AC at their upcoming meeting.

Franks Woods pointed out that, according to the State, brown bears in Unit 9 were managed for a high density population and were also considered a valued species that provide recreational and economic opportunities for many people. And his fear was that unless this mentality changed and something was done by the legislature, very little would be done to address the problem caused by bears in this area. And as result, predation on moose and caribou by bears would continue and the local people would be left with less and in some cases without meat for the table. He wanted to continue this discussion and hopes that as people from local tribes and villages go in for the upcoming Board of Game meeting they would share their views and BBNA would be working with them to help prepare written testimony and etc during the meeting.

Joe Chythlook expressed appreciation for the folks that came to this meeting and encouraged as many people as possible to continue to be involved in trying to solve the moose and caribou issues at hand. He also mentioned that he would be available to help during the Board of Game process. And if there were any questions about the process, he would be willing to share any information concerning it from his experience and help where he can.

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39.

**Hans Nicholson's Conclusions**  
**From**  
**Bristol Bay Moose and Caribou Enhancement Project Meeting**  
**Held at King Salmon, Alaska on April 22, 2009**

Unit 9 Moose

- Brown bear population on neonatal moose has been the primary limiting factor of moose population in Unit 9.
- While results of the latest ADF&G fall sex and age comparison surveys indicate that moose populations in Unit 9 have been relatively stable over the last 25 years, the local residents are having a difficult time harvesting moose for their subsistence needs.
- Moose densities remain very low in Subunits 9A & 9A, and southern portion of 9E.
- In March 1999, the Board of Game found that moose in Subunits 9B, 9C, and 9E met the criteria to be considered "important for providing high levels of human consumptive use" as per the State of Alaska intensive management law.
- A 1983 moose census portions of Subunits 9A, 9B, 9D, & 9E showed an estimated population of 5900-6000 moose.
- Lem Butler's power point presentation during the March 2009 meeting gave estimation of 8000 moose, which raised some eyebrows, since there had been no partial survey done since 1983. Lem's estimations were extrapolations from trend area counts and estimations on carrying capacity on range habitat.
- ADF&G reports indicate harvest in Unit 9 have remained relatively stable for the past 20 years. Reduced harvest since 2000 reflect changes in the number of moose hunters and coincided with reduced opportunity to hunt caribou on portions of Unit 9. Changes in the number of moose taken have resulted from decreased effort and do not indicate differences in moose population.
- Brown bear predation on moose was considered the major limiting factor preventing an increase in moose densities in Unit 9, followed by harvest of cows in some areas.
- The very high bear/moose ratios in Unit 9 would require substantial reduction in bear densities to achieve a measurable improvement in moose calf survival.
- ADF&G has placed a high priority for managing bears in Unit 9 and any drastic reduction on bear numbers would probably be opposed by a large segment of the public.



40.

- Local residents attending the meeting agree bears are increasing in numbers and are causing more problems in fish camps, lodges, and in surrounding communities while they prey on game species that locals rely on for subsistence uses.
- Bears are more of a problem than wolves and control measures need to be implemented sooner rather than after prey species populations decline.

#### North Alaska Peninsula Caribou Herd(NAPCH)

- The NAPCH continues to decline since the mid 1990s.
- In 1999, in response to this continued decline, the Board of Game evaluated intensive management options for this herd and concluded that there were no viable solutions that existed to alter the status of the herd.
- A Tier II hunt was initiated the same year to manage the herd for human consumption.
- The most recent composition survey done in October 2008 indicates low calf/cow ratio (10.3 calves/100 cows) is typical of the calf recruitment observed in the past six years and is considered very low for a caribou population.
- The herd is expected to continue to decline and the current bull/cow ratio (19 bulls/100 cows) is now below the management objective of 20 to 40 bulls/100 cows.
- In response to the continued decline of this herd, the managers closed all hunting of the NAPCH in 2005 with no intentions of reopening the hunt until the herd begins to recover.
- Most recently, the Board of Game also closed caribou hunting in Unit 10.
- In the last Board of Game meeting, most of the predator control proposals presented did not pass except for proposal 65, which was amended to establish a predator control area for wolf in Unit 9D and 9E. The plan was to be reviewed in the statewide meeting in 2010.



To Whom It May Concern:

As a resident of the Yanert area, I am writing to voice my concern about the proposed expansion of motorized use in the Yanert hunting zone. To put it simply, I am fully opposed to it. We local residents rely on those trails for winter recreation free from the pressures & threats of open hunting. We see annually the deleterious effects of even non-motorized hunts, when there are thirty vehicles & trailers parked at MP 228 & enough subsequent backcountry traffic to form highways in the mud.

As I understand it, opening the Yanert would act as a stop-gap against overcrowding up near Ferry. It seems fairly obvious that the same fate would follow the same plan, & then there would be two communities in close proximity angry about the same thing. I know that the Denali Highway is for all intents & purposes closed just by dint of being so tough to travel, but couldn't snowmachine users hunt from the highway trailhead? Wouldn't that be comparable in terms of geography & moose population?

If so, that would certainly alleviate the problem of strangers on motorized vehicles travelling at all hours literally through our backyards. & while on the subject, it's worth noting that there are no existing parking places for potential hunters in our neighborhoods. Nowhere along Hickory or off of Kanna Ridge are there ample parking opportunities, if any at all, to support the trucks & trailers that would be frequenting the area. Those vehicles would naturally impinge on personal property & would be almost assured to cause resource damage in so doing.

Please keep in mind that none of this is spurred by an anti-hunting sentiment. On the contrary, I hold a license & support the hunt. But I do think that lifting existing limitations will only invite carelessness, overcrowding & the slow & gradual pollution of our local resources.

Thank you for your time & consideration.

Andrew Pace  
MP 228.9 George Parks Hwy  
Denali Park, AK 99755  
303.981-7332



ATTN: Board of Game Comments

Alaska Department of Fish and Game

Boards Support Section

February 13, 2012

To the Board of Game regarding Proposal 232. Controlled Use Areas.

Please do not allow any motorized vehicle access in the Yanert Controlled Use Area in Unit 20.

My name is Jerri Roberts and I live a Mile 227.2 Parks Highway in the vicinity of the 17B easement to the Yanert since 2003. I am an outdoor enthusiast and use all of the trails in this region for solo and family hiking, skiing and snowshoeing. The greatest thing about this area is being able to have a wilderness experience on these trails without intense motorized activity any time of the year.

The hunting activity here is non motorized for those who want a true wilderness experience unfettered by noise pollution and overuse that motorized hunting brings to an area. Many hunters seek the solitude of non-motorized hunting. Alaska is a very large state with other areas available away from a populated community where families use these trails constantly. I think there are safety and environmental outcomes that will negatively impact this corridor forever. I have hiked on trails several miles from here where there is motorized hunting and it is apparent that the wonton, reckless use of these vehicles has destroyed the tundra forever. Gone are the peaceful hikes and safe trail conditions.

Even from the non-motorized hunting, I have observed problems on the highway with vehicles, horse trailers, trash and reckless use of the area and adding perhaps hundreds more vehicles impacts this area where there are no designated turnouts and vehicles just destroy the fragile ecosystems along the highway and create traffic hazards. There are other areas in the Interior that are better candidates for motorized hunting that our community here in the McKinley Village (Denali Park) area and I ask that motorized vehicle access in the Yanert Controlled Use Area in Unit 20 be denied.

Thank you for your careful consideration of this issue.

Sincerely,

Jerri Roberts,

P. O. Box 158, Denali Park, AK 99755, 907.683.0723 H, 907.322.3823 C



Attn: Board of Game Comments  
Alaska Department of Fish & Game  
Boards Support Section

As a resident of Denali, a land owner at Carlo Creek, and a hunter, I would like to express my opposition to Proposal 232, which would open the Yanert Controlled Use Area to motorized hunting during the winter months. The granting of motorized access to hunters from the month of October establishes a precedent that will ensure drastically greater use of this area. This will cause problems. As October is a month rarely graced with snow in Denali, ATV and OHVs would be used to gain access. If this were not restricted, the inevitable destruction of trails and vegetation would be harmful to the very animals that we hunt and their habitat.

I hunt and recreate in the Yanert during the winter. The greatest appeal of this area to me and many others is the fact that motorized hunting is expressly forbidden in the CUA. If hunters choose to hunt here, they must be willing to do so on foot or on horseback and to haul out meat on their backs. Please do not follow through with the plans to transform this very special place into another loud and crowded, trail-ravaged hunting area. Let them walk.

Regards,

Benjamin Toth

Mile 228 Parks Hwy  
PO Box 194  
Denali, AK 99755



***Dave & Toni Claxton  
484 Ruth Estates Road  
Fairbanks, Alaska 99712  
907-457-3416  
907-978-5154***

February 18, 2011

Board of Game  
ADF&G Board Support Section  
PO Box 115526  
Juneau, AK 99811-5526

Re: Proposal #50, RC52 – WE STRONGLY OPPOSE THIS PROPOSAL

**Why is the proposed CHP necessary??? What does it accomplish???  
What management objective are you trying to achieve with implementation  
of the CHP???**

These are the areas of responsibility the Board of Game is charged with, and the proposed CHP does nothing to achieve any of them.

The additional hunt requirements for the CHP, over and above the requirements for Tier I or Drawing Permit hunts, can all be accomplished *voluntarily* by *any user*, and *are unverifiable by the ADF&G enforcement body*. Additionally, the CHP provides added benefits for CHP permit holders, giving them an unfair advantage over non-CHP hunt participants. Why is this necessary?

This hunt adds *nothing* to the ANS number. The 300 permit maximum is not *in addition to* but part of the total ANS of 600-1,000.

It adds *nothing* to the reasonable access to the resource. The season, methods and means of take are all the same as the Tier I hunt.

It does not *appear* to be meant to provide additional or expanded access or availability of the resource under a Tier II situation. All members of a group applying for a CHP during a Tier II permit requirement *must already have obtained a Tier II permit*.

It does not appear to be an effort to tighten enforcement, or compliance with existing regs. CHP's are required to report harvest information, just as are Tier I and Drawing Permit holders.

The added *condition*, not even a *requirement*, that participants in the CHP "must make efforts to ensure that the applicable customary and traditional use pattern described by the board, *if any*, is observed by subscribers, including meat sharing". How is the department going to determine whether the participants



have "made an effort" to, for instance, share meat? Are they going to require signed affidavits from the "sharees"? Or just take the word of the applicant, that "yes, I will *make an effort* to share my meat"????

And why would it be necessary for that condition *to be stipulated in a regulation* when the individual participants in the normal Tier I hunt, or any other hunt for that matter, *can opt on their own to abide by that type of community or social preference?*

As far as I can tell, the CHP hunt serves only 2 purposes.

1) It allows for more game to be taken *per household* versus the 1 per household allowed under the current hunts.

Why is this necessary? Why should these advantages be allowed for this hunt, and not the other Tier 1 or Drawing Permit hunts? The available surplus *is what it is*. Allowing for an increased bag limit for a CHP hunt *does nothing to either increase or decrease the available surplus, nor the ANS*. So what is the point?

Why would, for instance, a family of 5 that decides to participate in a CHP be more needing or deserving of taking 5 *caribou* (the 1 per person allowed for the CHP hunt) than a family of 5 that applies only for a Tier 1 permit or Drawing Permit and is therefore only allowed 1 *caribou*? Why is that restriction placed on non-CHP hunts, and not the CHP participants? Who really benefits from that?

2) And it also allows CHP participants to *hunt other species in other areas of the state*, versus the current Tier I restriction that prevents Unit 13 Tier I participants from hunting *either moose or caribou* outside of Unit 13; and versus the ineligibility of Drawing hunt participants to apply in a successive year, while the CHP participants *are allowed permits in consecutive years*. This provides *more opportunity* for the CHP participants than those participating in either a Tier I or Drawing permit hunt.

Again, why is this necessary? Why would it be allowed? Why does my example family of 5 that participates in a CHP hunt *need or deserve* the ability to harvest more game than a family of 5 that applies for a Tier I or Drawing Permit? Why should they be allowed to harvest 5 *caribou* in Unit 13, *and then have the opportunity to harvest moose anywhere else in the state*, while the family of 5 that receives a Tier I permit is allowed *only 1 caribou in Unit 13, and access to moose only in Unit 13?*

Again, WHY? Why is this hunt being proposed?

The ANS is not threatened. The ADF&G has determined that the harvestable surplus of caribou in Unit 13 is 2,300, while the ANS is 600-1,000.

The harvestable surplus is not threatened, and even if it was, the CHP would do nothing to protect it!

And according to AAC and State Statute, those are the only 2 things the Board has the responsibility to regulate. It is completely unclear to us what management objective are you trying to achieve by instituting the CHP's.

We strongly urge that the CHP hunt be **not be implemented because there is no reason for it.**

Sincerely,

Dave & Toni Claxton



February 18, 2011

Roger Christensen  
Mile 229.5 Parks Hwy.  
Denali Park, AK. 99755

ATTN: Board of Game Comments  
Alaska Dept. of Fish and Game  
Boards Support Section

To Whom It May Concern:

During my lifetime I worked as the chief pilot for Lynn Castle a master guide who guided in the Wood River and Yanert drainage areas. I was around while Lynn and Samantha Castle got the Dept. of Fish and Game to ban motorized vehicles in the area because they could see the harm and the erosion to the tundra and permafrost through the use of these vehicles.

Every area we have flown over where they are allowed the tundra and permafrost is ruined and does come back to its natural state.

Therefore, I am vehemently against the opening up of this pristine area to motorized vehicles, so please leave what Lynn and Samantha Castle saw as so important to the area to stand as it has been for many many years.

I'm also objecting to issuing permits to mother moose kills thereby preventing the increase of moose in the area.

I've flown thousands of hours over this exact area and the moose population is so depleted right now that the murdering of more mother moose will ruin it forever.

Sincerely,



Roger Christensen



**Attn: Board of Game Comments/Letter of Opposition to Proposal 232**

Scheduled to be considered at the Southcentral Region Board of Game Meeting in March, 2011

Fax to: 907-465-8094

**Alaska Department of Fish & Game  
Boards Support Section**

This letter is to oppose opening game unit 20A, the Yanert non-motorized area, to motorized use after Sept. 30. The forethought decades ago of Lynn Castle Master Guide, using his knowledge gained from a UAF degree in wildlife biology, protected this important resource area by making it non-motorized. This fragile area needs consistent future protection from the assault that areas opened to motorized hunting have faced. This proposal will not solve the problems at Rex and Ferry trails, only create more.

This area has been incredibly exploited already after exclusive guide areas were found to be unconstitutional. This flooded the Yanert River valley with transporters, for hire horse hunting guides and fly in hunters. I can speak of this personally by witnessing this while living in a cabin near the headwaters of the Yanert year round from 1993 to 2000. We depended on getting a moose each year while I lived in the bush, and with all the traffic it became difficult. After my moving to the mile 229 area of the highway in 2001, I have continued to watch the quality and quantity of sheep, moose and bear decline each hunting season as the previous strong genetic lines have been hunted harder and harder.

There are lots of theories, but I would urge you to listen to the people who live day to day with the land and the animals. The idea that this will help increase the antlerless moose quota safely is unfounded. The thought that it is a safe river for travel is absolutely ridiculous, the Yanert is a large, late freezing river. I have personally witnessed many people stuck in overflow with their machines at the bottom of the river. There are limited trails and access in this area as it crosses Ahtna land, and is governed by a 17B easement. Furthermore, our community does not have the resources to rescue those who get in trouble in this unpredictable landscape. In addition, this motion is being brought forward out of cycle, this is an Interior issue at a Southcentral meeting, this has extensive implications and needs to be guided by science not supposition.

This area cannot sustain any more pressure than it already receives, from tourism and helicopters alone these animals endure tremendous summer stress at a time they are trying to build up stores to survive winter.

This proposal is very vague. There are much bigger issues to be considered that are not going to be solved by allowing motorized use that is not even delineated as snowmachine, ATV, OHV, etc. Let's have the courage to protect the Ethics of Fair Chase and hunt with dignity and respect not with motorized vehicles. As a hunter, I appreciate there being a place where I can hunt non-motorized, that has real value and true Alaskan spirit behind it.

Thank you for allowing public comment on this important issue,

Cathy Lieser, P.O. Box 167, Cantwell, Alaska 99729



To: Alaska Board of Game 907-465-6094  
 From: Mary Bishop, 1555 Gus's Grind, Fairbanks, AK 99709  
 Date: Feb. 16, 2011  
 Re: Proposal #50

ZPP

I wish to make two points.

**1. I support your decision to set up the Tier 1 hunts as you did in Unit 13**, i.e. caribou hunters could only hunt moose and caribou within Unit 13 for the year. The regulation rewards "local use" yet does not deny non-local use. The regulation kept the number of applicants down to about 3300 – a manageable number. Excellent! This technique is a tool to keep handy among the many others in your "toolbox" – to use when the situation calls for it.

**2. I am strongly opposed to Proposal #50.** I am opposed to establishing Community Hunt Areas and Community Hunt Permits.

After lengthy study of the proposed language I make no allegations whether it is or is not consistent with State statutes and Constitution – I just believe it is a very bad idea. Thirty years ago the social fabric of our State was torn apart by the federal subsistence law. Now you propose to increase that fracture through new State law. Bad idea!

Why do it? Quite obviously, no state or federal law requires you to accept this proposal. The caribou population has increased; the undesirable Tier II situation is no longer a problem. And hurrah! – new hunters can now be among the 3300 hunters participating through the successful Tier I hunt you have already established. You do not need to implement Proposal #50 and, in my opinion, you should not.

Somehow, perhaps 300 people who planned to apply for the CHP and would not have that opportunity should be afforded some opportunity. That is the problem you should, in my opinion, try to solve.

This year it's 300 caribou. What will be allotted to CHP's in future years? Over 200 tribal groups exist in Alaska, probably all with cultural values related to community resource harvest.

In my opinion the cultural hunt requirements could, and perhaps should, be accomplished voluntarily by tribal members. The tribal government, far more appropriately than the State, could define and enforce its own customs on its membership. The tribal group could also report to the State if they wished to do so. Any tribal member could apply and receive the normal State registration permit, the same as other individuals have already done to hunt this same population of caribou. Proxy hunting privileges are available to elders and disabled persons.

The State has successfully struggled to raise the harvestable surplus of caribou in the Nelchina area, above the undesirable "Tier II" situation. Now this harvestable surplus – as well as other harvests – could be impacted by this and future CHP's established for advocates who already have a substantial priority to harvest moose and caribou on all federal lands (over 60% of Alaska) plus appropriate trespass control on millions of acres of private land.

**When equality is no longer the standard, how much inequality is justifiable?**  
**Enough is enough, already.**



A few specifics of which you're probably already aware:

Section 5 AAC 92.072(d) is incomprehensible. It appears that "seasons" would be the same for CHP vs. individual hunts -- but bag limit, sex harvestable, household vs. individual permits, etc., etc. are not mentioned. The "unless" in the first sentence apparently allows multiple, overlapping CHA's and CHP's within a geographic area. A nightmare to manage let alone enforce! Because about 3300 individual Tier I permits are being allowed this year, does the 2<sup>nd</sup> sentence suggest the same number of CHP's would/should be allowed in that area?

Section 5 AAC 92.050 says one Unit 13 Tier I caribou permit per household. But the newsprint supplement says one per household for individual hunters and one per person for CHP applicants.

*Mary L. Bishop*



TO:  
ATTN: Board Support Section.

From: David Young  
Billie Young  
Travis Young

I have included ~~at~~ each of our comments  
in one fax to save the # of calls required to be made.

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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

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.

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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.

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**Proposal #215 - Support,** with amendment to include the bonus point system with all permit drawings.

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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: Travis D. Young



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

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Submitted by: David E. Young



ATTN: Board of Game Comments  
AK Dept of Fish and Game  
Boards Support Section  
907.465.6094

February 15, 2011

Dear Fairbanks Fish and Game Advisory Committee,

I am writing to express my disapproval of Proposal 232 to open up the Yanert Controlled Area in Unit 20A to motorized hunting. This area is many people's "backyard", as it were, including my own. I frequently use the trailhead at MP 228 to jog and berry pick in the fall. Already the area is congested during hunting season with trailers, trucks, and even motorhomes parked dangerously along the highway. The trail is becoming muddy and braided in places, and shows obvious signs of overuse, and has numerous signs of pit fires. Much trash can be found in the area around hunting season, a very sad sight for local residents who love this valley. Opening it up to motorized use would certainly increase that congestion on all counts, as well as increase noise levels, scaring local dog teams, and deterring locals like myself from our yearly non-consumptive uses. In the winter I ski on these trails nearly every day, and though I often see small caribou herds, moose are not overly abundant. Their tracks are not common, and one finds very little evidence of broomed willows, which would indicate a booming moose population, making one more reason to discourage opening up the area to a yet larger group of hunters.

Overall, I strongly disagree with this proposal, and hope that the thoughts and land use of local residents are taken into account in your decisions.

Sincerely,

Jan Tomsen  
BS in Wildlife Biology, UAF  
Mile 229 Resident



**TO: Alaska Board of Game Support Section  
PO Box 115526  
Juneau, AK 99811-5526  
Fax # 907-465-6094**

**FROM: Duane Howe, Wildlife Biologist, retired  
41640 Gladys Ct  
Homer, AK 99603**

**DATE: February 18, 2011**

**SUB: Bear and Wolf Conservation, Harvest and Management Policy  
Amendment Proposals**

**I am very disappointed in the proposals that I see in the Alaska Board of Game Notice of Proposed Regulatory Changes. In this age of science and technology it is like stepping back into the eighteenth century when wildlife biology and ecosystems had not yet been heard of. Here I am using information technology of the 21<sup>st</sup> century to write about current issues that were laid to rest in most of the enlightened world during the last century. But now the effects of these misguided management proposals can be even worse. They did not have radios to help locate predators that long ago, or helicopters to help eradicate them, fortunately, or that piece of the wildlife ecology puzzle might have been lost forever.**

**This is not limited to the "management for abundance" the ADF&G tried to sell to Alaskans a few years ago. This is predator eradication pure and simple. I could see it coming during the last several years. Wolf shooting at first was limited to a few relatively small areas where moose numbers were claimed to be too low for the local residents to sustain themselves, which was later revealed to be just an excuse to enable predator control and increase trophy moose numbers for nonresidents.**

**Each year there were more and more of those areas where moose were supposedly too scarce for subsistence users to keep food on the table. Now, apparently, it is the entire state that is desperate for predator control. That, of course is not surprising, since most of the game is taken by non-natives who may or may not even live in Alaska.**

**Management decisions are routinely based on the perceived need for human food rather than any attempt to balance moose numbers with the carrying capacity of their range. This basic need is mentioned in passing, but no serious attempt to use carrying capacity as a management objective is ever made. The following quote from the BOG publication says it all:  
"Given the extremely high value placed on human harvest of prey species,**



**the option of dramatically reducing or eliminating human harvests of prey species for extended periods of time is generally not an acceptable management approach". This is not wildlife management.**

**Even though wolf killing has already gone too far there seems to be a push to go even further. The aerial killing program would be capable of eliminating wolves over large areas under the right conditions, especially if such tactics as denning, baiting, killing females with pups and hiring "agents of the state" were used to carry out the slaughter.**

**Weapons such as foot snares and aerial gunning may be used for the first time to kill bears of all ages at any time of year. This will set another terrible precedent. Alaska will be known as the state that appreciates wildlife only for its material values, especially if game animal parts are allowed to be marketed. This is especially egregious. The sale of game animal parts other than the hides of furbearers has long been considered unacceptable. When this is allowed it encourages more poaching, as has been seen already with the poaching of black bears for their claws and gall bladders.**

**The cost of aerial predator killing is not mentioned, but I would guess that it would be cheaper to buy meat at the grocery store than to pay for the elimination of predators to increase moose populations. And there is no mention of how it is to be paid for.**

**These proposals need to be reconsidered in the light of wildlife management practices supported by science. A good place to start might be the recommendations of the National Institute of Science resulting from a study commissioned by Governor Tony Knowles about ten years ago. Those recommendations were ignored at the time because they did not support the agenda of the BOG. The recommendations of many former Alaska professional wildlife biologists have also been ignored. The last three governors also have refused to appoint BOG members that would support scientific wildlife management policies, resulting in the reinforcement of predator control as the primary tool of game management. The proposals give lip service to non-consumptive uses of wildlife, but offer no substantial support for it.**

**I sincerely hope that, for the benefit of the future of Alaska, the BOG will begin to consider scientific management policies for all of its wildlife. It would be good for the morale of the dedicated state wildlife biologists who have had to endure the misguided ideology of the BOG for too many years.**

**Thank you for considering these comments.**

*Deanne Hone*



To the Board of Game regarding Proposal 232 Controlled Use Areas.

My name is Bob Shelton. I live at mile 228 on the Parks Highway and have lived here for the past 19 years with my wife and son. We own a modest home and property which represents a significant investment on our part. We have a son who was raised here. We are avid outdoor people and intimately familiar and connected to the country around us.

I am adamantly opposed to the proposal to allow motorized access in the Yanert Controlled Use Area (YCUA) in Unit 20. The proposal lacks a genuine understanding of what would be encountered in terms of access and local conditions.

- As a local outdoor user (and hunter), I believe this to be an interior, local issue and entirely inappropriate that the Fairbanks AC would propose this change. This proposal is out of cycle and suggests an under the radar approach.
- Parking for vehicles and trailers is minimal to nonexistent. Along with the lack of parking is a lack of any sanitation facilities to accommodate users.
- The terrain that is likely to become the primary hunting area is high alpine tundra, susceptible to disturbance and degradation if subjected to early season ORV use as it has fragile soils and thin, sensitive vegetative cover.
- Since the main access to the YCUA would be the Yanert, it is highly likely that overflow would be a problem. In numerous conversations with others like myself that have extensive experience with this river in winter, we have all encountered serious overflow and open water conditions, especially early season.
- The suggestion that "mostly snowmachines" would be used demonstrates another lack of familiarity with this area. Local snowmachiners are very aware of a general lack of snow cover. Conditions early season would invite the use of ORVs and the accompanying degradation of trails we see in motorized use areas. Recreational snowmachiners travel the extra miles to Broad Pass for a reason. What little snow we do get is often blown onto the mountain slopes where it loads into highly unstable avalanche prone slabs.
- Because the Yanert River is often open late into winter and serious overflow conditions persist, hunting would likely focus on a small area where the potential of pockets of overuse and destruction of habitat would be magnified.
- There is no basis for the suggestion that opening this area to motorized use would somehow mitigate the impacts to the Rex and Ferry areas. If anything, the problems in these areas would simply be transferred to the YCUA, with the resulting negative impacts.
- The proposal changes the existing longstanding CUA (since the 1970s). This area is available to hunters who choose to use non-motorized means.

This proposal is unsupportable and should not be approved. Hunting is now available to Alaskans who are motivated and willing to use non-motorized means. It offers hunters a unique opportunity to hunt in an area of outstanding wilderness values. Please do not compromise this experience due to pressures artificially imposed by intensive harvest quotas.



To: Alaska Board of Game Comments

From: Nick Humphreys

Re: Intensive Management Law, AS16.05.255

I would really like to see the more liberalized things proposed. I would really like you to consider baiting for Grizzlies/ Brown bear in all of Unit 13 in the fall during moose season. In the summer the bugs are too horrendous and the bears are breeding. In the fall you would have a more selective harvest and more hunters are out in the field. I hope you take this into consideration. I would definitely devote a large portion of my time to getting a grizzly during that time because the travel and time off from work make it hard to hunt both under typical situations.

Thank you.

Nick Humphreys  
Anchorage Alaska  
907-351-5609



## COMMENTS ON PROPOSAL 222 AND 223 REGARDING ANTLER DESTRUCTION AND PROXY HUNTING

Dear Board of Game,

Thank you for revisiting this issue. I have proxy hunted a few times in the past, and the new regulations have caused some difficulties. I realize the proxy opportunity has been abused in the past, with guys using multiple proxies and shooting four or five caribou at a time, while other hunters can't find one to shoot. I'm sure you know more about the abuses that occurred than I do.

I think that to proxy for only one person at a time is a reasonable regulation. And also to limit or disallow proxy hunting in tier 2 or antler-restricted areas also seems fair.

I don't like the antler destruction regulation, especially for the proxy's own big game animal. You're already going out of your way to help get a moose or caribou for someone, and then have to destroy your own antlers as well is painful. Especially if they are a nice set. I realize that you can get your own moose or caribou first, and then go get your proxy paperwork signed. This requires a hundred mile round trip to Delta for me, to go to ADF&G and I've made the trip 2 or 3 times in the middle of a weekday and they weren't even open.

I realize the primary objective of proxy hunting is meat and not antlers. At the very least I would like to ask that the proxy hunter's own antlers would not have to be destroyed. On some hunts, a hunter may encounter two caribou and have the opportunity to harvest one for himself and one for his beneficiary. He should not be penalized by having to cut off the antlers of the one that he tags. An even better scenario would be to keep the antlers of both intact. Thanks for your consideration.

Tom Geyer Delta Junction, AK



ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
RE: Proposal 232

February 18, 2011

This letter is in regards to the proposals set forth for the Yanert valley "game management plan" Proposal 232 for Controlled Use Areas. I am writing to support the comments set forth by those who oppose 232 and support "No Action" for proposed changes made to this area, specifically those comments set forth by the Middle Nenana Fish and Game Advisory Committee.

I have worked and lived at a local air service based at Milepost 229 at the edge of unit 17b for the past 11 years. I have some serious issues with this proposal, and it sounds like I am not alone. This plan seems incredibly intrusive and poorly thought out on many levels: too much game being taken, too many users, and too much potential for user destruction of the area during access are at the top of the list.

I would also like to highlight the visual impact that such motorized activity would have on the area. In my time spent flying over large amounts of the state I am amazed at the amount of unspoiled terrain that one can find, and at the same time shocked at how easy it is to spot any motorized use of an area....present or past. The tell-tale "black streaks" left behind by even a single four wheeler who decides to deviate from an already established trail or detour around a difficult patch of terrain are evident from long distances and for long periods of time. This is especially important for anyone who makes their living providing opportunities to view the beauty of such unspoiled areas from the air. People do not come here to see the scars left behind from motorized vehicles, they come to see the raw beauty of Alaska. I would imagine, that if such imminent negative impacts on this piece of nature doesn't register with the Board, then negatively impacting tourist dollar income might.

As has been pointed out this area is already low on animal numbers. Forty years of hunting and harvesting of this area under the current system has barely allowed for the natural balance of nature to sustain. What is not needed are MORE vehicles and MORE hunting. I don't see how this proposal promotes a healthy population in the area. If anything I it will only tip an already fragile balance over the edge and require further and harsher actions to try and restore it.....which typically involves increased predator control as a result of human over indulgences and a decrease in hunting permits. Where is the supporting evidence for this proposal being an effective way to promote a healthy population and to best manage this area?

I am urging a serious reconsideration of this proposal and at a minimum further discussion and evaluation as to the merits of this plan.

Thank you for your consideration

Dan McGregor  
Box 82  
Denali Park, AK

Attached is the Middle Nenana Fish and Game Advisory's position for further review:



Alaska Department of Fish and Game Boards Support Section

The Middle Nenana Fish and Game Advisory Committee oppose Proposal 232. Controlled Use Areas This Proposal makes a fundamental change in a long standing Controlled Use Area, in effect since the 1970's. Opening an area to motorized use for hunting (even though there is currently motorized use for recreation) introduces a new level of impacts and safety issues. This Proposal requires vetting in a wide arena and not simply in the context of intensive management needs.

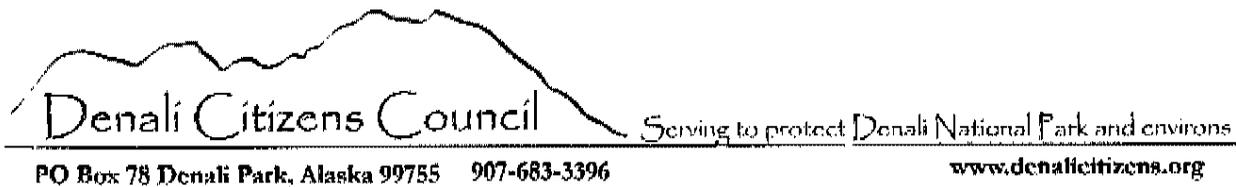
1. This in an Interior Proposal being offered at a non-Interior meeting. Offering a Proposal of such significance out of cycle may be legal but it is not appropriate. This important decision may have flown under a lot of folks' radar because it was not proposed by their own AC. Please drop it now and address it at an Interior BOG meeting, if you must consider it.
2. The Proposal itself is vague, inaccurate, and not restrictive enough to prevent problems.
  - a. The Proposal's suggestion that it will mitigate impacts to Rex and Ferry by spreading them to yet another region is fundamentally flawed - there is no proof that spreading the impacts will produce any meaningful reduction of those same impacts in any of the areas. It will simply spread the impacts of motorized use for hunting to a new area. This spreading of impacts is not justified simply by its unproved benefit for intensive management.
  - b. Many problems with access in the Yanert exist, including 1) a sole 17 b easement from the Parks Highway, 2) absence of a safe highway trailhead for vehicles and trailers, 3) potential for destruction of habitat by use of larger vehicles to carry a full camp and haul out moose parts, 4) Potential for destruction of exposed, shrubby, moist tundra habitat in the upper reaches of the creeks where moose are likely to be in winter, 5) Avalanche dangers in these same areas are more easily triggered and made more severe by motorized uses.
  - c. The Proposal suggests that access will be from October through December with "mostly snow machines." However, October is a transition month, often snowless. **ATVs or OHVs will use the Yanert** at this time if not restricted.
  - d. the Fairbanks AC appears to believe that hunting the Yanert will avoid the problems of open water encountered in other parts of 20A. However, the Yanert is traditionally a very unstable river with periodic overflow throughout the winter, making travel unpredictable. This is of course true for all forms of access, but to allege that the Yanert is somehow better and more reliably frozen is untrue.
3. Past surveys done by F&G show this area has a very low density of moose. The impact on habitat by motorized vehicles can not justify the limited numbers of moose that may increase harvest quotas, set artificially high by Intensive Game Management mandates.
4. The non motorized recreational value of this area for quality hunts in intact wilderness, for moose, caribou and ptarmigan along with the harvesting of berries, mushrooms and other natural foods should be given consideration.
5. Increasing motorized use of this area will create added pressure on already stressed wildlife populations in winter, particularly for sheep, caribou and moose.



I am writing to express my opposition to the Board of Game's proposal #50. Game belongs to all Alaskans. Hunts designed to manage the size of game herds are fine if based on sound management principles, but the opportunity to participate should be open to all State residents, not limited to residents of given communities. Thank You for your consideration. Grant L Lewis

6101 CHSR  
Fairbanks, AK 99712





Alaska Board of Game  
 Boards Support Section  
 PO Box 115526  
 Juneau, Alaska 99811

Feb 18, 2011

Dear Members of the Board of Game,

I write these comments on behalf of the board and members of the Denali Citizens Council. DCC, founded in Cantwell, is a grassroots public advocacy organization. Many of our members live in the gateway communities of Denali National Park and Preserve and have firsthand knowledge of and a large stake in activities conducted on public lands around the park.

**We urge you to defeat Proposal 232.** The Yanert Controlled Use Area has been in place for more than two decades and reflects an important past decision by the Board of Game. The Board felt then, and we continue to feel, now, that it is proper and appropriate to designate certain areas for hunting on foot or by non-motorized conveyance such as horseback. The aesthetic of this type of experience is something that a number of Alaskan hunters crave, and it is not available many places in Alaska. We urge the Board of Game not to act hastily, at a non Interior meeting, to enact this Proposal. It is viewed with skepticism by locals, including the local Advisory Committee, it is not well thought-out, and it may not even achieve the desired goal, while at the same time introducing myriad unintended consequences.

**Here are a few other reasons we oppose this proposal**

1. Although pitched as a snowmachine hunt, this could easily become an ATV-ORV hunt, since October is often a snowless, warmer time of year in the Yanert Valley. Introducing the myriad of impacts that are recorded in other parts of 20A through use of ORVs-ATVs will be a major, if unintended, consequence and could be predicted into and through November on certain years.
2. The ROW into the Yanert Valley is a narrow 17 b easement across Ahltna lands. It is likely to be overused and damaged during the transition months of October – early November.
3. Moist tundra with ponds and mixed taiga forests dominate much of the valley floor, and they are classically vulnerable to rutting, pooling and other impacts from the heavy loads required to pull a full camp in, then a loaded moose out using motorized equipment. In searching uplands for moose, folks are going to leave what few established trails there are, spreading the rutting and pooling.
4. Parking along the highway is minimal to non-existent and this problem complicates the existing hunt. Trash pickup is non-existent. Conflicts with very close residential neighbors are inevitable.
5. Winter hunts conducted with snowmachines carry with them the same impacts as listed in #2 and #4, and additional ones from the avalanche dangers in upper creeks and, despite what the Proposal alleges, instability and periodic overflow on the Yanert River and associated creeks.

Please consider leaving this Controlled Use Area as stipulated...it is one of a kind. The benefits to intensive management by opening this valley will be **far outstripped by the costs** and impacts mentioned above.

Sincerely,

  
 Nancy Bale, President, DCC  
 907-277-3825

DCC Board

Nancy Bale  
 Anne Beaulaurier  
 Charlie Loeb  
 Jared Zimmerman

Nan Eagleson  
 Hannah Ragland  
 Cass Ray  
 Erica Watson

Julia Potter, Community Organizer



I strongly oppose dropping the current non-motorized management of the Yanert Special Use Control Area 20 A. Having this area as non-motorized has been a great management tool for AK Fish & Wildlife to maintain a quality hunt in this area. With most all areas of Alaska opened to motorized hunting access it only seems fair to manage this area for those who want to hunt either horseback, hiking or by dog team. There are no other areas along the road system that offer this opportunity in a quality hunt area. Please keep the current non-motorized regulations in place.

Bruce Lee, P.O. Box 137, Denali Park, AK 99755



## Oppose the Board of Game's Proposal #50

On March 4 in Wasilla the Board of Game (BOG) will begin deliberating on proposed hunting regulations.

This year's Proposal #50 would mark the beginning of a new "modus operandi" for the BOG, allowing Community Hunt Areas and Permits throughout the state. The program -- as the new model for game allocation -- could, if it becomes widespread, jeopardize reasonable opportunity for allocation to individual Alaskans, which our state Constitution is supposed to protect.

The new program is slightly different from the 2009 Ahtna Community Hunt denied by the court as being "fundamentally residency- based" and unconstitutional. This year's proposal would allow groups with a custom of community-based harvest and sharing to apply for a community hunt area or CHA. The BOG would say "yea" or "nay" to the application based primarily upon 8 criteria found in regulation 5AAC 99.010(b).

But **any** group of 25 or more—listing individual members who commit to abide by the defined customs -- could hunt with a Community Hunt Permit or CHP.

If the Community Hunt Area and Permit proposal is accepted by the BOG, this year just 300 total caribou will be allotted to share among all groups that agree to practice Ahtna's tribal harvest traditions in GMU 13. Those traditions include salvaging certain portions of the animal for human consumption (fat, kidneys, stomach), ceremonial sharing, and youth hunter rituals. The CHP requires detailed reporting about these matters. A "Draft for External Review" describing the requirements is available at [www.wc.adfg.state.ak.us/division\\_info/chp\\_copper\\_basin.pdf](http://www.wc.adfg.state.ak.us/division_info/chp_copper_basin.pdf)

In my opinion these conditions could and should be accomplished voluntarily by tribal members. The tribal government, far more appropriately than the State, could define and enforce its own customs on its membership.

The tribal group could also report to the State if they wished to do so. Any tribal member could apply and receive the normal State registration permit, the same as about 3200 individuals have already done to hunt this same population of caribou. Proxy hunting privileges are available to elders and disabled persons.

The complex and somewhat vague language of the proposal seems to allow for numerous and overlapping cultural CHP's in future years -- for example Ahtna, Chickaloon, and Eklutna, -- all having potentially separate seasons and cultural requirements defined and enforced by the State.

This year it's 300 caribou. What will be allotted to CHP's in future years? Over 200 tribal groups exist in Alaska.

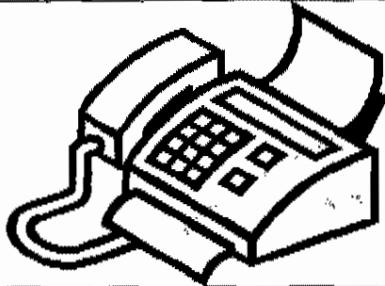
The State has successfully struggled to raise the harvestable surplus of caribou in the Nelchina area, above the undesirable "Tier II" situation. Now that harvestable surplus could be impacted by CHP's established for advocates who already have a substantial priority to harvest moose and caribou on all federal lands (over 60% of Alaska) plus appropriate trespass control on millions of acres of private land.

State law does not require this new mode of operation for the BOG. Four of the 7 board members have supported the concept. I won't speculate whether the proposal does or does not meet the requirements of our State's legal system. I simply think it's a very bad idea. The social fabric of Alaska has already been far too damaged because of the subsistence issue.

When equality is no longer the standard, how much inequality is justifiable? Enough is enough, already.

Roger Penrod  
10287 Halfhitch Circle  
Anchorage, AK 99515  
907-306-0546





# A facsimile from

## Toghotthele Corporation

Jim Sackett, CEO/President

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Toghotthele@hotmail.com

To: Boards Support  
Section: F+G

Fax number: 465-6094

Date: 2/9/11

**Regarding:** Public Comment on Proposed  
Statewide Provisions at upcoming  
Board of Game Meetings.

I am in Full Support of  
Reauthorizing The Brown Bear  
Tag fee exemption for all  
units. I'm also in Full support  
of intensive wolf Harvesting to  
increase moose & caribou populations.  
Thank you for your consideration.

Jim Sackett (1. banks)



Attn: Board of Game Comments  
Alaska Department of Fish & Game  
Boards Support Section

907-465-6094

Fritz Wittwer, Marianne Jakob  
PO Box 4, Parks Hwy Mile 227  
Denali Park, AK 99755

2/16/2010

**Proposal 232**

Dear Board Members,

We would like to express our concern about the change that is about to take place in Unit 20A.

To open up this unit to motorized use will conflict greatly with the mostly pristine wilderness that is appreciated equally by our bed & breakfast-guests and by us as local residents. It will make our business a less desirable place in the late season, so it might take business away. Also there will undoubtedly be more hunters attracted to hunt here, which leads to countless more vehicles parked along the highway where there are access places. This will not only be ugly to look at but might also lead to a hazardous traffic situation.

In addition to that we oppose the extension of the hunting season past September 30. This community has a lot of folks that enjoy many activities in the great outdoors. An extension of the hunting season would prolong the condition that we already endured during the entire month of September. There are already so many hunters in the woods that it feels unsafe to go out.

Thank you for considering our concerns.

Sincerely,  
Fritz Wittwer, Marianne Jakob

