

On Time Public Comment Index  
Alaska Board of Game  
Southcentral Region Meeting  
March 15-19, 2013

PC001	Art Greenwalt	PC025	Greenpeace
PC002	Brian Peterson	PC026	Cascadia Wildlands
PC003	Chugach State Park Citizens' Advisory Board	PC027	The Alaskan Bowhunters Association, Inc.
PC004	Gus Lamoureaux	PC028	John Frost
PC005	Fish and Wildlife Service; Office of Subsistence Management	PC029	DNR; Division of Parks & Outdoor Recreation, Chugach State Park
PC006	Alaska Wildlife Alliance	PC030	Dave Bachrach
PC007	Fish and Wildlife Service; Kodiak National Wildlife Refuge	PC031	Prince William Sound Charter Boat Association
PC008	Duane Howe		
PC009	Beth Davidow		
PC010	Nina Faust		
PC011	Darlene Hilderbrand		
PC012	Brenda Dolma		
PC013	David Pinguoch		
PC014	Roxane Miller		
PC015	Safari Club International; Kenai Peninsula Chapter		
PC016	Kathleen Vaden		
PC017	Mathew Kopec		
PC018	Alan Lennard		
PC019	Friends of Chugach State Park		
PC020	Phil Nicols		
PC021	Katchemak Bay Conservation Society		
PC022	Alaska Professional Hunters Association, Inc.		
PC023	National Parks Conservation Association		
PC024	Kneeland Taylor		



Boards Support Section  
Board of Game

As a 42-year resident of Alaska and as one who has hunted and hiked extensively, I am deeply concerned about the lack of a Denali Wolf Buffer Zone as well as the moratorium emplaced on discussion of that issue.

The Buffer Zone was created to ensure a very valuable resource, the wolves of Denali Park, were given a biologically-justified safety zone which acknowledged that wildlife does not behave in accordance to geo-political boundaries. It was in place for several years with no negative impacts and a very quantifiable, large positive impact for tourism. Its removal was nothing short of a petulant slap at the federal presence and a totally indefensible, intentional ignorance of the Alaskan public's will as demonstrated by a large petition submitted to the Board. The removal was not the act of a mature, science-based entity and it's absence remains a glaring demonstration of that fact.

The moratorium itself is at best illegal for removing from public discussion at the whim of the Board a very significant topic affecting not only Alaskans but national and even international tourism in the area. Already substantial revenue from a national wolf viewing group has been lost as a result of the decreased viewing the lack of a buffer zone created. Further, the trapping incident this past spring in which a Grant Creek female wolf was taken (and allowed to die in the trap with subsequent loss of any pelt, thus a total waste) highlighted not only how poorly thought out was the decision to remove the buffer zone but how quickly negative results came about.

Much attention has been paid to this incident in particular and the decision in general in the statewide press as well as newspapers outside of Alaska, Internet venues, and radio programs. The result is a great deal of negative "press" for Alaska's wildlife management methods. This is wholly due to the decision to remove the Buffer Zone.

I would very strongly urge the Board reconsider their moratorium as well as their removal of the buffer zone as soon as possible and reverse both actions. To do otherwise is only to invite more bad press and possible federal action.

Additionally, I wish to express my support for proposals 18, 19, 104, 173, and 174. The very idea of snaring bears is reprehensible. It seems anymore the Board of Game is in the business of killing off wildlife in the most brutish ways possible and this is certainly one. It wipes out two generations at once. It is in no way discriminating. It creates a danger to others using the forest.

Sincerely,  
Art Greenwalt  
1620 Washington Dr., Apt.79  
Fairbanks, Ak. 99709

A handwritten signature in cursive script, appearing to read "Art Greenwalt".



## September to December 2012 Sitka Black Tail Deer Survey Western Ugak Bay Kodiak Island Alaska

Researchers A&B: thirty one days in the field , 62 total days 6 does, 5 fawns ,6 bucks.

Researcher C&D: twenty four days in the field, 48 total days, 0 does, 0 fawns, 0 bucks

Researcher E&F:17&10 days in the field respectively,27 total, 2 does, 1 fawn, 2 bucks

Researcher G&H: 31 days in the field,62 days total,5 does, 3 fawns,2 bucks

Researcher I&J: 64&24 days in the field respectively, 12 does, 8 fawns, 5 bucks

Total: 287 days in the field, 25 does, 17 fawns, 15 bucks

Buck to doe ration is 60%

Residents harvested two of the does. Researchers harvested two of the bucks, 3 ½ and 5 ½ y/o

---

Submitted by Brian Peterson Master Guide, Ugak Bay

Attn: Nissa/Kristy  
BOG SC Region  
Public Comment

**RECEIVED**  
**FEB 21 2013**  
**BOARDS**  
**ANCHORAGE**



## CHUGACH STATE PARK CITIZENS' ADVISORY BOARD

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

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

February 19, 2013

Re: March 2013 Board of Game Proposals

I am writing on behalf of the Chugach State Park Citizens Advisory Board regarding new statewide regulatory proposals that will affect Chugach State Park.

The Chugach State Park Citizens Advisory Board assists park staff in an advisory capacity with park management and development issues. As an advisory board, our decisions are guided by the five primary purposes established in creating the park:

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

At approximately 495,000 acres, Chugach State Park is among the four largest state parks in the U.S. and comprises nearly half of Alaska's Game Management Unit (GMU) 14C. Most of the big game animals that inhabit GMU 14C use the park at least part of the year. Our 15-member advisory board is appointed by the Director of the Division of Parks and Outdoor Recreation. The advisory board intentionally represents a wide variety of park users. With over 1.3 million visits to the park annually, we are interested in Board of Game regulation changes that may affect park resources and visitors.

We have carefully reviewed the March 2013 Board of Game regulatory proposals that will affect the park's wildlife and users. Our comments and recommendation for each proposal follow below. These recommendations passed unanimously during our February 11, 2013, meeting.

**Proposals 133-135 – Support.** These three proposals reauthorize antlerless moose hunts in the Anchorage Management Area and remainder of Unit 14C and the any-moose drawing hunt in the upper Ship Creek drainage. All of these permit areas are in Chugach State Park.

**Proposal 136 – Oppose.** This proposal would allow department biologists the discretion to reduce the number of drawing permits for Dall sheep in Chugach State Park by 50 percent and change the bag limit. The department already has the discretionary authority to manage harvest quotas and bag limits in Chugach State Park. We believe the department has done a good job adjusting harvest levels when sheep populations increase and decrease in the park. The current management strategy, with a bag limits of a



full-curl ram for rifle hunters and any sheep for the relatively few successful bowhunters, is conservative and appropriate. The proposal is unnecessary.

**Proposal 137 – Oppose.** This proposal would require the department to issue three to six drawing permits for Dall sheep drawing hunt DS123 in Chugach State Park. DS123 was established to allow recipients of the Governor’s tag to hunt for trophy rams in several areas with little or no competition from other Dall sheep hunters. Thus, only one DS123 permit has been issued each year since the hunt was first conducted in 2005. Several very large rams have been taken in the hunt area, and the potential for trophy rams and near-exclusive use of the area have increased the value of the hunt among those bidding for Governor’s tags. Our advisory board has always supported this hunt at the current level; however, we believe issuing more permits would lead to lower bids for the Governor’s tag and increased conflicts with other park users.

**Proposal 138 – Oppose.** This proposal would create a new drawing hunt for full-curl Dall sheep rams in Chugach State Park in the drainages of Falls Creek, the south fork of Eagle River, McHugh Creek, the north and south forks of Campbell Creek, Rainbow Creek, and Rabbit Creek. Our advisory board has supported many justifiable extensions of sheep hunt areas in Chugach State Park. However, we believe this proposal goes too far in several ways. First, most of these areas are relatively close to road access and are, therefore, very popular and heavily used by other park users. Second, with a few exceptions, which are dealt with in the next proposal, relatively few legal rams are found in these areas. Third, both hunters and nonhunters enjoy viewing bands of ewes and juvenile rams at relatively close range in some of these drainages. Adopting this proposal would create conflicts between user groups and frustrate sheep hunters who win a coveted Chugach State Park sheep permit but are subsequently unable to find a legal ram.

**Proposal 139 – Neutral.** This proposal would expand the hunt area for DS123 to include Ram Valley in Chugach State Park. During our meeting on February 11, 2013, the advisory board was not able to come to consensus on certain aspects of this issue. Consequently, our group has no recommendation on this proposal.

Thank you for the opportunity to respond to the regulatory proposals submitted for the March 2013 Board of Game meeting. Please let me know if you have any questions regarding these comments and recommendations. I can be reached at 907-227-4125. Thank you for your consideration.

Sincerely,

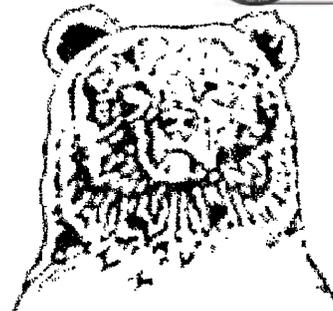
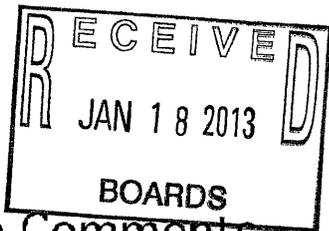
A handwritten signature in cursive script that reads "Judy C. Caminer".

Judy C. Caminer, Chair

cc: Jessy Coltrane, Alaska Department of Fish & Game  
John Baker, Alaska Department of Law



From  
Gus Lamoureux



ATTN: Board of Game Comments

P.O. Box 90444  
Anchorage, AK 99509-0444  
USA  
Phone: 907-248-3230  
Fax: 907-245-7338  
Email: info@alaskafishandhunt.com  
www.alaskafishandhunt.com

# Fax Cover Sheet

Send to:	Alaska Department of Fish and Game	From:	Gus Lamoureux
Attention:	Boards Support Section	Date:	Jan 17, 2013
Fax number:	907-465-6094	Ph. number:	907-248-3230

URGENT   
 REPLY ASAP   
 PLEASE COMMENT   
 PLEASE REVIEW   
 FOR YOUR INFORMATION

Total pages, including cover: 4

Please find following my comments on the 2012/2013 changes to regulations for the Southeast, Southcentral, and Central/Southwest Regions. I am faxing these in and they will also be mailed so if one method gets lost the other one will be on hand. I have had a few things of import go missing lately so I thought I should cover my bases.

Thank you  
Gus Lamoureux



January 17, 2013

## Comments to the Proposed Changes to Regulation for the Southeast, Southcentral, and Central/Southwest Regions.

Dear Board Members:

I do not envy you your job, and do realize it is an important part of the big game regulation process. Please accept my comments on the 2012 / 2013 big game proposals. I will be out of State conducting business at one of the hunting shows I regularly attend this time of year in PA, attempting to bring revenue to our state by means of non resident hunters.

Since so many of the proposals I am commenting on pertain to limiting non resident participation in Alaskan Hunting and because this has been my livelihood for almost forty years and that this has been a family business for at least sixty years, I feel compelled to, at a minimum, expound on a small part of what my business contributes to our community. As you are probably aware, I, like most hunting guides have to employ assistant guides. In my case that number is about nine per season. Most of these guys are Alaskan residents and in some cases Native American Alaskan residents. Some of these people do nothing else besides hunt or fish guide. Because I have base camps in the areas we guide in, I have a plethora of expenses every season maintaining these facilities and equipment in a professional and clean condition. I won't elaborate here but these annual expenses generally exceed \$75,000. Other expenses including wages are normally \$30,000 to \$50,000 per season. Multiply these numbers by a minimum of 400 (the estimated number of registered and master guides with operating businesses) and you come up with a rough idea of our contribution. Most of, if not all of this is bought from or contributed to our Alaskan economy. This does not even go into what the non residents contribute by means of their purchases. I have lived here in our State since birth and consider myself an Alaskan in every sense of the word and have made exceptions in many cases for "resident hunters" that have elected to move their camp right on top of mine. Seeking a quality experience for my clients I usually hunt elsewhere if possible. I have in several cases rescued ill prepared resident campers and have let them overnight in my camp facility when there is room and the emergency dictates such. *In one case I saved a persons life.*

I urge the board to very carefully consider the proposals before you, as our country is at a time where we cannot afford to reduce the work force and should be doing everything to enhance opportunity. The ramifications of some of the proposals could make a huge hole in our local economy and that of many rural economies as well as my pocket book. In many of the proposals the comment of "no one will suffer" is not anywhere near accurate. In the classification of "who will suffer" many of these proposals over look the "Alaskan Resident" because without non resident participation the Department of Fish and Game would be forced to pass their operation costs on to us... **ALASKAN RESIDENTS!** This would raise the fees for all resident licenses and all big game tags, sometimes adding a big game tag free where there currently is no fee.



January 17, 2013

Moving on to the proposals:

**Proposal # 52 OPPOSE** and would like to add the first word under the comment section, I take exception to: "Unjustified" If forty years of conservative harvest is not justified I am not sure what is. My dictionary defines this word as "not shown to be right or reasonable" This proposal is unjustified. I, and many of my peers have scaled moose harvest down. In my case, one or two moose clients per season from an allowable six for the past ten years and have made every effort to give non resident meat from the harvest to local people whenever I can. I have made a positive difference in the ungulate population in the small part of GMU 9 that I operate in. Keep in mind, this is in an area that used to allow two moose, three caribou and a brown bear per person per year with no distinction of residency. Prior to the Caribou meltdown, rural Alaskans seldom harvested moose in this area as the Caribou herd passed by their village. Nowhere in the "who is likely to suffer" section does it mention the guide industry nor does it mention the rural economies that the guide industry contributes to.

**Proposal # 54 SUPPORT AS AMENDED** (May 10 thru May 31 even numbered years, (September 25 thru October 10 odd numbered years) as I believe the proposal as written it is too liberal in it's intent and the brown bear harvest will be far to high. The spring weather in this area has changed in the past four years making it very difficult to harvest bear. Biological data shows the harvest for the spring of 2012 down over 100 animals. I had to suspend my operation as I am float plane based and the area lakes did not open until more than half of the bear season was over. This is the first time I have had to deal with this in over forty years. The amount of bear harvested by guides on Federal land is a given number and changing the spring dates as the proposal suggests from May 01 thru the 31 is a good idea. Resident hunters will enjoy better hunting and camping toward the end of the May season. Being allowed to hunt a little later during the spring season would be beneficial to almost all guides and hunters included. No one would suffer from hunting in a more friendly environment. The fall season could be opened earlier as well to increase bear harvest from September 25 thru October 10, these amended dates would be a much more conservative approach to the dates the proposal requests. These are the only parts of the proposal I would agree upon being amended or changed. I do not agree that we should liberalize the season to include harvesting one bear per season. The suggested amended dates above will reduce the impact that predators have on the ungulate population by increasing the predator harvest. Bristol Bay has been managed for the Brown Bear for years. Ungulate population levels prove that minor changes should be implemented. Changes that are not too radical are changes that all hunters can live with. Most importantly changes that can be quickly reversed if a noted over harvest becomes apparent.

**Proposals # 55, 56, and 57 OPPOSE** which are amendments to RB525.

**Proposals # 109, 110, 111, 112, 113, 114, 115, 116, and 117 OPPOSE** for obvious reasons which I stated above in my opening paragraphs. Any limit or advantage from one group to another is not constitutional.



January 17, 2013

### **Proposal # 118 SUPPORT**

**Proposal #140 SUPPORT AS AMENDED** to include everyone. Setting up two classifications of hunters reminds me of the airlines. Not everyone has or ever will have a Gold card or MVP status. Another option to consider would be to close the entire season, hope for a couple of good winters in succession and re open the season when the animal numbers rebound.

**Proposal #141 OPPOSE.** There is no reason that anyone needs two goat in one season. The meat is palatable but not the best table fare. Regardless of how the proposal is written there will be many cases of one hunter killing both of his "permitted goat" on the same mountain side on the same hunt. This will increase the potential for want and waste. The overpopulation is being worked on by local and non resident hunters. The length of horn size has already gone down in the area I operate in suggesting that harvest objectives are being met. Nannies are already allowed, but discouraged by ADF&G which contradicts wording in this proposal. In my area of operation, in response to a request from ADFG and USFWS, we have taken a very aggressive approach to goat harvest. Outfitters in other heavily populated areas are also doing the same and capitalizing on mountain goat in this GMU. I predict it to be just a matter of time before the numbers roll down. The length of the goat season is already very liberal which encompasses several months accommodating just about every group of people. A season into March would probably put them on the beach where they can be slaughtered like the deer which are now nonexistent.

**Proposal # 142 SUPPORT.** My comment would be a wounded animal of any specie should count as a harvest. That is usually one of the rules explained in the contract of a guided hunt. With the exception of Brown Bear on Kodiak, the resident hunter has been able to take advantage of being a poor shot.

**Proposals # 162, 163, 164, 165, 166, 167, 168, 169, and 170 OPPOSE** for the obvious reasons I expounded on in my opening paragraph

Thank you board members for your consideration to my comments.

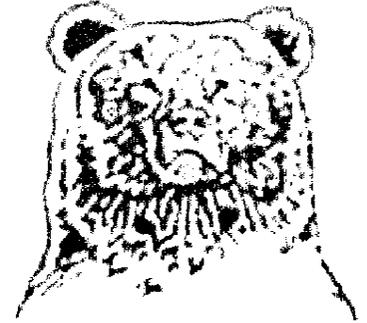
Sincerely,

Gus Lamoureux

Owner/Operator: Ugashik Lake and Kodiak Bear Camps



*FROM*  
*Gus Lamoureux*



**ATTN: Board of Game Comments**

P.O. Box 90444  
Anchorage, AK 99509-0444  
Phone: 907-248-3230  
Fax: 907-245-7338  
Email: [info@alaskafishandhunt.com](mailto:info@alaskafishandhunt.com)  
Website: <http://www.example.com>

## Fax Cover Sheet

Send to:	Alaska Department of Fish and Game	From:	Gus Lamoureux
Attention:	Boards Support Section	Date:	February 28, 2013
Fax number:	907-465-6094	Ph. number:	907-248-3230

Total pages, including cover: 3

Please find following my opposing comments on proposal 141.

Gus Lamoureux



February 28, 2013

## Comment on Board of Game Proposals

Opposed to: proposal 141

According to the Kodiak Fish and Game I am one of the Major players in guided big game goat hunts on Kodiak Island. I have worked through the permit system for a number of years, some years drawing one or two permits and some years drawing none. The current registration system has worked well for us and our employees and has turned into a viable business opportunity. We have been averaging seven to eight fall Mountain Goat hunts per season since the registration hunt started. We have already noticed a decline in horn length. This proposal would continue to diminish the overall horn size. This will turn clients off and the goat population will continue to rise with immature billies being the only harvestable animal other than nannies.

Goat meat is not a very palatable meat and I question the wisdom of anyone wanting two of them. I am also very opposed to shooting them after the month of December. Shooting a mountain goat on the beach in deep snow would be a let down to most sport hunters.

This proposal will open the door to many goat being wounded and not followed up on as a hunter can simply



shoot another one and let the difficult one that jumped over the cliff lie and rot.

Even though the proposal mentions that only one goat may be harvested in the field at one time I think this will open the door for more than one being harvested and the meat from at least one animal wasted or not packed in, in it's entirety.

If this proposal is accepted I would like to see a amendment that reads the second goat must be harvested after December 31<sup>st</sup> and it must be a (female) nanny without kids.

Thank you for your consideration.

Sincerely,

Gus Lamoureux



IN REPLY REFER TO:

## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

1011 E. Tudor Road  
Anchorage, Alaska 99503-6199



FWS/OSM13017.TE

**FEB 22 2013**

Mr. Ted Spraker, Chair  
Alaska Board of Game  
P.O. Box 115526  
Juneau, Alaska 99811-5526

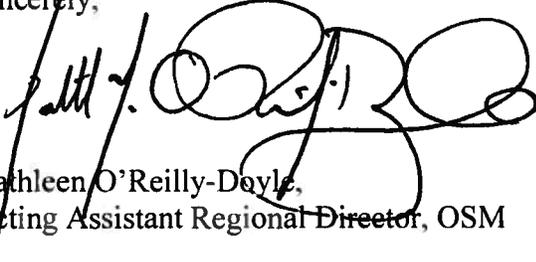
Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet March 15-19, 2013, to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Central/Southwest Region. We have reviewed the 48 proposals the Board will be considering at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management (OSM), working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal Subsistence users and wildlife resources. Our comments are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact Trevor Fox, Wildlife Biologist, 907-786-3400, with any questions you may have concerning this material.

Sincerely,



Kathleen O'Reilly-Doyle,  
Acting Assistant Regional Director, OSM

cc: Cora Campbell, ADF&G  
Tim Towarak, Chair, FSB  
Kristy Tibbles, Board Support Section  
Jennifer Yuhas, ADF&G  
Interagency Staff Committee  
Chuck Ardizzone, OSM  
Administrative Record





**RECOMMENDATIONS**  
**ALASKA BOARD OF GAME PROPOSAL**

**Southcentral Alaska Region**

**March 15-19, 2013**

**Kenai, Alaska**

**U.S. Fish and Wildlife Service Office of Subsistence Management (OSM)**



**PROPOSAL 129 – 5 AAC 85.045.(4)** Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 6C.

**Current Federal Regulation:**

**Unit 6 – Moose**

*Unit 6C—1 antlerless moose by Federal drawing permit (FM0603) only. Sept. 1 – Oct. 31*

*Unit 6C—1 bull by Federal drawing permit (FM0601) only. Sept. 1 – Dec. 31*

*In Unit 6C, only one moose permit may be issued per household. A household receiving a State permit for Unit 6C moose may not receive a Federal permit. The annual harvest quota will be announced by the U.S. Forest Service, Cordova Office, in consultation with ADF&G. The Federal harvest allocation will be 100% of the antlerless moose permits and 75% of the bull permits.*

**Is a similar issue being addressed by the Federal Subsistence Board?** Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 29, 2013.

**Impact to Federal subsistence users/wildlife:** Reauthorizing the antlerless moose season in Unit 6C would not impact Federally qualified subsistence users, as they can already harvest antlerless moose with a Federal drawing permit. In addition, the current Federal harvest allocation is 100% of the antlerless moose permits. Moose harvest is limited by annual quotas and reauthorizing the antlerless season will not impact the fall moose season.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** this proposal.

**Rationale for comment:** While Federally qualified subsistence users already have an opportunity to harvest antlerless moose in Unit 6C, reauthorizing the State antlerless season will maintain management flexibility within the unit.

**PROPOSAL 132 – 5 AAC 85.045(12).** **Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14C.

**Current Federal Regulation:**



### Unit 7 – Moose

<i>Unit 7—that portion draining into Kings Bay.</i>	<i>No Federal open season</i>
<i>Federal public lands are closed to the harvest of moose.</i>	
<i>Unit 7 remainder—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit (FM0004) only.</i>	<i>Aug. 10 – Sept. 20</i>

### Unit 14C – Moose

<i>No Federal subsistence priority</i>	<i>No Federal open season</i>
--	-------------------------------

**Is a similar issue being addressed by the Federal Subsistence Board?** Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 29, 2013.

**Impact to Federal subsistence users/wildlife:** Federally qualified subsistence users cannot harvest antlerless moose under Federal regulations, but could apply for a State antlerless moose drawing permit. A limited number of antlerless permits are issued when the moose population can sustain a cow harvest and, thus, reauthorizing the antlerless season should not impact the population.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** this proposal.

**Rationale for comment:** Reauthorizing the State antlerless season will maintain management flexibility in the unit.

**PROPOSAL 151 – 5 AAC 92.510(a) Areas closed to hunting.** Re-institute the closure of Palmer/Lower Resurrection Creek areas (Unit 7) to moose hunting as follows:

Palmer Creek/Lower Resurrection Creek Closed Area.

Palmer Creek drainage to its confluence with Resurrection Creek, and Resurrection Creek drainage from the confluence with Palmer Creek downstream to Turnagain Arm, closed to taking of moose.

**Current Federal Regulation:**

50 CFR part 100 §\_\_.26 (n)(7)(ii)(C)

*You may not hunt moose in the Resurrection Creek Closed Area in Unit 7, which consists of the drainages of Resurrection Creek downstream from Rimrock and Highland Creeks including Palmer Creek.*



**Note:** The Federal Subsistence Board temporarily lifted the closure in the Resurrection Creek Closed Area via action on Emergency Special Action 12-03.

**Has a similar issue being addressed by the Federal Subsistence Board?** The Board approved Emergency Special Action 12-03 on July 30, 2012 to open the Resurrection Creek Closed Area for the 2012/2013 moose season to align with State regulations. This allowed Federally qualified subsistence hunters, in 2012, an additional 10 days of opportunity to hunt in this area prior to the start of the State season.

The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 29, 2013.

**Impact to Federal subsistence users/wildlife:** Only residents of Cooper Landing and Hope have a customary and traditional use determination for moose in Unit 7 remainder, which includes the Resurrection Creek Closed Area, under Federal regulations.

**Federal Position/Recommended Action:** The OSM position is **neutral** on this proposal.

**Rationale for comment:** If adopted, State regulations would be aligned with Federal regulations. However, if the board rejects the proposal, the Federal Subsistence Board could take action to open the Resurrection Creek Closed Area to mirror State regulations. Two primary concerns were brought forward by the proponent if the previously closed area remained open to moose hunting: 1) the potential for harvest to contribute to the ongoing decline of the population; and 2) public safety. Although moose composition surveys have not been conducted in Unit 7 since 2005-2006, it is not expected that there will be a significant increase in the harvest based on past harvest rates. During the 2011 season two moose were harvested, and no moose were taken in 2012. Safety concerns due to the proximity of homes, community facilities, active mining claims, residential subdivisions, and recreational use areas to active hunting areas in the Lower Resurrection Creek and Palmer Creek drainages should be considered along with conservation concerns of the moose population.

**PROPOSAL 161 – 5 AAC 85.065. Hunting seasons and bag limits for small game.**

Lengthen the spring season with a decreased bag limit for ptarmigan on the Kenai Peninsula as follows:

Units 7 and 15 ptarmigan. August 10 – February 28: 10 birds per day – 20 in possession;  
March 1 – April 30: 5 birds per day – 10 in possession.

**Current Federal Regulation:**

**Unit 7 – Ptarmigan**

*20 ptarmigan per day, 40 in possession*

*Aug. 10 – Mar. 31*



## Unit 15 – Ptarmigan

<i>Units 15A and 15B—20 ptarmigan per day, 40 in possession</i>	<i>Aug. 10 – Mar. 31</i>
<i>Unit 15C—20 ptarmigan per day, 40 in possession</i>	<i>Aug. 10 – Dec. 31</i>
<i>Unit 15C—5 ptarmigan per day, 10 in possession</i>	<i>Jan. 1 – Mar. 31</i>

**Is a similar issue being addressed by the Federal Subsistence Board?** Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 29, 2013.

**Impact to Federal subsistence users/wildlife:** Current State and Federal ptarmigan seasons end on March 31, 2013, so Federally qualified subsistence users would be provided more opportunity to harvest ptarmigan under an extended State season in Units 7 and 15. However, the extended season may adversely impact the ptarmigan populations in the affected units by allowing harvest further into the breeding season, when ptarmigan are more susceptible to harvest. Federal regulations generally have higher harvest limits for ptarmigan than the current and proposed State regulation, except for the Unit 15C winter season which has a reduced harvest limit from January 1–March 31 under Federal regulations.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** the proposal.

**Rationale for comment:** The proposed ptarmigan season extension to April 31 would extend into the breeding season, which could have adverse effects on the ptarmigan population in Units 7 and 15. The timing of harvest can be important, and spring harvests can have a higher impact on populations than fall harvests (Kokko and Lindstrom 1998). Male ptarmigan defend territories from late April to early June, but breeding behavior can begin in March. Previous research found peaks in natural mortality when ptarmigan were defending territories and participating in courtship displays (Sandercock et al. 2011). Male ptarmigan have a high tolerance for disturbance during the breeding season and are more susceptible to human harvest (Hannon et al. 1998). The potential for harvest impacts on ptarmigan is higher in areas of Alaska, such as the Kenai Peninsula, that are accessible from the road system and close to population centers.

### LITERATURE CITED

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Sandercock, B. K., E. B. Nilsen, H. Broseth, and H. C. Pedersen. 2011. Is hunting mortality additive or compensatory to natural mortality? Effects of experimental harvest on the survival and cause-specific mortality of willow ptarmigan. *Journal of Animal Ecology* 80:244–258.



**THE ALASKA WILDLIFE ALLIANCE**  
"LETTING NATURE RUN WILD"



March 1, 2013

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

RECEIVED  
MAR 01 2013  
BOARDS  
ANCHORAGE

To Members of the Alaska Board of Game:

The Alaska Wildlife Alliance (AWA) herewith submits its written comments on proposals to be considered at the meeting for **Southcentral region** regulations, March 15-19, 2013 in Kenai.

**AWA's Mission Statement**

The Alaska Wildlife Alliance is a non-profit organization committed to the conservation and protection of Alaska's wildlife. We promote the integrity, beauty, and stability of Alaska's ecosystems, support true subsistence hunting, and recognize the intrinsic value of wildlife. The AWA works to achieve and maintain balanced ecosystems in Alaska managed with the use of sound science to preserve wildlife for present and future generations.

Thank you for considering our comments.

Yours truly,

Connie Brandel  
Office Manager



## Alaska Wildlife Alliance's Comments on the Alaska Board of Game Proposals

### Southcentral Region Meeting

#### PROPOSAL #

#### COMMENT

- 137**      **OPPOSE** This proposal would mandate that at least three tags and up to six tags be issued for the taking of full curl Dall sheep rams within Chugach State Park, which lies in close proximity to Alaska's largest city. Currently, one tag is issued annually, so the proposal significantly increases the number of mature rams that can be taken. Chugach State Park is heavily used by recreationalists and passage of this proposal will lead to increased conflicts with other park users. The very same animals that are targeted for trophy hunters are popular among wildlife viewers.
- 138**      **OPPOSE** This proposal would create a new drawing hunt for full-curl Dall sheep rams in Chugach State Park in the drainages of Falls Creek, the south fork of Eagle River, McHugh Creek, Campbell Creek, Rainbow Creek, and Rabbit Creek- areas that are extremely popular among park users. These are among the most viewed Dall sheep in the state with excellent viewing opportunities available and a new hunt is not appropriate. Adoption of this proposal would certainly create conflicts between user groups.
- 139**      **OPPOSE** For the same reasons stated above, we oppose this proposal. Additionally, we take issue with the author's language in the proposal calling the Anchorage-area biologist "overzealous". Just because he happened to disagree with her decision, does not give him the right to slander her in a public document. Board support should take the time to review each proposal before the proposal book is printed and remove offensive statements that call specific people names. At the very least, the author should be required to back up his statement with supporting evidence.



**153** **OPPOSE** This proposal modifies the registration season dates and bag limit for brown bears in Units 15A and 15C. Only Fish and Game biologists are qualified to determine if additional harvest of brown bears is sustainable.

**158** **OPPOSE** This proposal would increase the bag limit for black bear in Units 15A and 15C to 5 bears per person annually. This is obviously unsustainable and will only lead to wanton waste. Unit 15C is mostly owned and managed by the Kenai National Wildlife Refuge which has very different management objectives than the state has, and we encourage the Board of Game to work collaboratively with them.

**160** **OPPOSE** This proposal would establish a year-round season for hunting wolves in Units 7 and 15. For many of the same reasons that we support proposal 172, we oppose this proposal. The Board of Game has an obligation to Alaskans to ensure that harvest of animals is sustainable and that there are provisions to discourage wanton waste of an animal. With a predator control program already in place, this is an irresponsible and wasteful proposal.

Recent data from a moose calf study confirmed that at most one out of 46 collared moose calves was taken by a wolf. The only paw print evident at the kill site was small and could have been a coyote. The actual problem is still habitat. Alaska State courts have ruled that wolves are to be given consideration as game animals and maintained as such. Year around killing of this resource puts it at unnecessary risk and is not in keeping with accepted scientific standards for resource management.

**172** **SUPPORT** This proposal would prohibit the taking of wolves March 1 through November 1 in the Southcentral region. This seasonal closure protects pregnant females from being killed and wolf pups from being orphaned while still dependent on their pack for survival. Modern wildlife management practices typically include provisions protecting females and their dependent offspring for obvious reasons.

**173 & 174** **SUPPORT** This proposal would prohibit the snaring of bears in the Southcentral region. Last year, over 70 scientists signed a statement declaring bear snaring unscientific, indiscriminant and inhumane.

Bear snaring is a very controversial practice and should absolutely not be allowed to expand into GMUs 6, 7, 8, 14C and



15 which includes the Kenai Peninsula, Kodiak, and Prince William Sound. Snaring of bears occurs during summer months when there is maximum opportunity for conflict with other users and creates a public safety hazard.

These areas draw visitors from around the world to view bears in the wild, and the more bears that are wantonly killed by snaring, the fewer sightings for tourists and residents alike.

We oppose the practice of bear snaring which is indiscriminate, cruel and is not biologically sustainable.

The Alaska Department of Fish and Game and the Board of Game have significantly liberalized regulations for the killing of predators in recent years. State regulations and policies now allow snaring of brown and black bears, baiting of brown bears, killing sows with cubs and cubs, year-round seasons, unlimited bag limits, and killing animals in their dens. In conjunction with these changes, the Board of Game has also reauthorized land and shoot hunting, and has vastly expanded predator control areas. All of this has been done with little scientific or social justification.

A scientific article published in 2011 in *The Journal of Wildlife Management, (Trends in Intensive Management of Alaska's Grizzly Bears, 1980–2010)*, documents the Alaska Board of Game's liberalization of hunting regulations for grizzly bears 124 times between 1995 and 2010. The four highly respected scientists concluded in their report that "Current attitudes, policies and absence of science-based management of grizzly bears in Alaska are increasingly similar to those that resulted in near extirpation of grizzly bears south of Canada in the 19<sup>th</sup> and 20<sup>th</sup> centuries. If current trends continue, they increase risk to portions of the most intact population of grizzly bears in North America".

#### 178A & 179A

**OPPOSE** These proposals would implement predator control programs in portions of Units 1A and 3 in Southeast Alaska targeting the Alexander Archipelago wolves.

This is not scientific management of the resource. Other factors contributing to a decline in the deer population must be taken into account before predator control measures are considered. Successive harsh winters, bear predation by black bears on fawns, and destruction of habitat resulting from clear-cut logging are all negatively impacting the deer population.



Scientific management is impossible without adequate information, and ADF&G does not even know the current population of deer, bears or wolves in the areas.

Preliminary estimates indicate the basic cost for just the predator control program and related deer population studies will be more than \$200,000 per year for five years, or \$1,000,000. In these days of shrinking revenue and deep budget cuts, the public would be outraged to learn that significant sum of state money is being spent just to provide a few more deer for hunters – if in fact the programs increase deer numbers at all.

In addition to being a large and unnecessary state expense, the programs will also decrease state and private-sector revenue. Fewer wolves – and the accompanying negative publicity about predator control measures - adversely affects the wildlife tourism industry, which benefits local economies when visitors come to catch a glimpse of the rare wolf. Neither do the programs address the loss of wolf viewing opportunities for many, many non-consumptive users, such as hikers and photographers.

###



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

February 24, 2013

RE: OPPOSE Proposal 156

Dear Board Members:

I am adamantly opposed to Proposal 156 that would permit the killing of brown bears at black bear bait stations in Units 15A and 15C. I request that you reject this proposal.

Bear baiting is an outdated and barbaric practice that habituates bears to human scented garbage, which makes them more likely to get into trouble around human habitation. Baiting of any bear, black or brown, only perpetuates this problem.

At present 31 other states have prohibited this dishonorable method of killing bears. Let's not make this practice even more revolting by allowing brown bears to be killed over bait.

Please do not pass Proposal 156!

Sincerely,

Cindy Birkhimer

Dear Board Members,

I would like to **SUPPORT** the following honorable proposals:

**Proposal 147**-Would suspend aerial taking of wolves in Unit 15A and modify the population and harvest objectives for moose.

**Proposals 173 and 174**-Would prohibit snaring of bears in the South-central Region.

Respectfully,  
Cindy Birkhimer



I OPPOSE 178 A and 179 A

I'm not an American citizen, but I decided to send this protest mail anyway.

I'm against those predator control proposals (178 A and 179 A) because they are inhumane, brutal and lead to extinction of wolves in Alaska. Wolves, as all other wild and domesticated animals, should be stronger protected from killing year around, this is my strongest wish.

Sincerely,

Tamara Handl  
Sweden

OPPOSE 178A & 179A

Do not kill the wolves. Have we all gone completely mad. My comments are no to killing wolves.

Denise Keeney

**OPPOSE 178A AND 179A**

**TO WHOM IT MAY CONCERN,**

**WOLVES ARE NOT POLITICS to be killed for no value. They SERVE a positive position within the cycle of life. LEAVE THEM ALONE!**

**Deb Congdon  
W16618 State Rd. 54  
Galesville, WI 54430**



## OPPOSE 178A AND 179A

Please Do NOT KILL the Wolves, They are ENDANGERED and NEED to be PROTECTED ~ PLEASE !!!!!

- Predation by wolves is not the most significant reason for the decline in the Sitka Black-tailed Deer population, as the ADF&G's own studies admit. There are many other factors contributing to the decline, particularly:
  - Loss of habitat because of clear-cut logging, especially of old-growth forests. This causes a decline in the wolf population as well as in the deer population.
  - Severe winter weather, especially three recent deep-snow winters. In fact, the Unit 1A Feasibility Study states "severe winter weather is believed to have the greatest impact on Unit 1A deer populations, often resulting in high rates of mortality."
  - ADF&G does not know the impact of black bear predation on deer fawns, but it cites data from a neighboring area indicating that black bears kill a significant number of fawns. The Feasibility Studies state that black bears have not (yet) been targeted for predator control in Southeast because of their economic value. Given this and many other unknown variables, predator control is not justified for either wolves or black bears.
- The Unit 1A study stated that "we have no research information to accurately estimate wolf...numbers on Gravina Island." The Unit 3 study stated that wolf population counts are not even feasible there. ADF&G is equally unsure how many black bears are in either Unit, and it does not even know how many deer there are. The science is clearly lacking to support any predator control measures.
- ADF&G's preliminary estimates indicated the basic cost for just the predator control program and related deer population studies will be more than \$200,000 per year for five years. In these times of austere budgets, there is certainly a better use for more than a million dollars of state money than to provide easier targets for a small number of deer hunters. Especially because, given the many other factors involved, it seems very unlikely the predator control program will actually result in more deer.
- The studies did not address effects of fewer wolves on the wildlife tourism industry, which benefits local economies when visitors come to catch a glimpse of the rare wolf. Neither did they address the loss of wolf viewing opportunities for non-consumptive users, such as hikers and photographers.

Best regards,

Nancy Billings



Board of Game:

**I OPPOSE Proposals 178A and 179A**

As someone who wants to travel to Alaska to see its renowned beauty and wildlife, I am appalled at the proposal before you to kill even more wolves. Why should a minority of extremists have sway over wildlife policies, disregarding the science, the economics, and the morality of killing wildlife that belongs to us all?

I urge you to say no to the ignorant scapegoating of wolves.

Sincerely,

Sue Hamber  
Escondido, CA



## OPPOSE 178A and 179A

These predator control programs are being called a "management experiment." Please, we strongly oppose this unscientific, expensive wolf killing "experiment" on the rare Alexander Archipelago wolves!

Predation by wolves is not the most significant reason for the decline in the Sitka Black-tailed Deer population, as the ADF&G's own studies admit. There are many other factors contributing to the decline, particularly:

- Loss of habitat because of clear-cut logging, especially of old-growth forests. This causes a decline in the wolf population as well as in the deer population.
- Severe winter weather, especially three recent deep-snow winters. In fact, the Unit 1A Feasibility Study states "severe winter weather is believed to have the greatest impact on Unit 1A deer populations, often resulting in high rates of mortality."
- ADF&G does not know the impact of black bear predation on deer fawns, but it cites data from a neighboring area indicating that black bears kill a significant number of fawns. The Feasibility Studies state that black bears have not (yet) been targeted for predator control in Southeast because of their economic value; nevertheless, if the BOG gets a foothold with predator control on wolves in the area, bears would likely be the next target. Given this and many other unknown variables, predator control is not justified for either wolves or black bears. ADF&G also clearly states that these two "experimental" programs could be used as models for more Alexander Archipelago wolf control programs in Southeast Alaska.

The Unit 1A study stated that "we have no research information to accurately estimate wolf...numbers on Gravina Island." The Unit 3 study stated that wolf population counts are not even feasible there. ADF&G is equally unsure how many black bears are in either Unit, and it does not even know how many deer there are. The science is clearly lacking to support any predator control measures.

ADF&G's preliminary estimates indicated the basic cost for just the predator control program and related deer population studies will be more than \$200,000 per year for five years. In these times of austere budgets, there is certainly a better use for more than a million dollars of state money than to provide easier targets for a small number of deer hunters. Especially because, given the many other factors involved, it seems very unlikely the predator control program will actually result in more deer.

The studies did not address effects of fewer wolves on the wildlife tourism industry, which benefits local economies when visitors come to catch a glimpse of the rare wolf. Neither did they address the loss of wolf viewing opportunities for non-consumptive users, such as hikers and photographers.

Robert & Lynnette Walters  
16460 W Bonita Park Dr  
Sun City Grand, AZ

Frequent Alaska Visitors - We'll see if that continues



## SUPPORT PROPOSALS 172, 173, 174

Dear Members of the Alaska Board of Game,

As a frequent visitor to Alaska and particularly Denali Park I implore you to end the barbaric practices of bear snaring and wolf hunting. These actions are neither scientifically defensible nor publicly popular.

- \* Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.
- \* Bear snaring is an extremely controversial method of killing animals. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its war on predators. Bear snaring has never been allowed in Alaska since statehood until the BOG approved an experimental program in 2008.
- \* Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage the harvest of females.
- \* Enforcement will be a nightmare for the Alaska State Troopers, who are already stretched thin.
- \* There are the dangers to other consumptive users, hikers and their pets who may come upon a situation where one bear is caught while its siblings or mother remain free in the area, creating the very real possibility of severe injuries or fatalities. The baited traps also create food-conditioned bears, and animals which learn to associate food with humans are a danger to our communities.
- \* Bears have cultural, economic and biological importance to Alaskans. Bear snaring is archaic, cruel and should be banned.
- \* Living bears have a very high value as a tourism draw and a source of revenue. They are almost always cited as one of the "big three" species visitors come to Alaska to see.

**PROPOSAL 172** would prohibit the hunting and trapping of wolves in all areas of Southcentral annually from March 1 until November 1. In some areas current regulations allow wolves to be hunted and trapped after March 1, when females may be pregnant. In other areas hunting and trapping is allowed before November 1, when wolf pups are dependent on adults in their pack for survival.

It is unethical and inhumane to allow the killing of wolves while the pups remain dependent upon the pack. This has the potential to wipe out two generations at once. Additionally, the loss of the pups is not counted in harvest statistics,



making accurate population estimates - and future management decisions - problematical.

Allowing the take of wolves during pup season is not a sound scientific, biological, ecological, or ethical method of managing this species.

Currently, hunting and trapping regulations in Southcentral are inconsistent. In some areas wolves may be killed before November 1, while pups remain dependent on their parents and the pack. In other areas hunting and trapping is legal after March 1, after mating has occurred and females may be pregnant.

Allowing the hunting and trapping of wolves between March 1 and November 1 means that two generations of a pack likely would be wiped out at once.

Dependent pups that do not survive are not counted, meaning that a substantially greater number of wolves is lost than is reflected in harvest statistics. This is unscientific and a very poor way to manage the wolf population.

Establishing a shorter, standardized season for wolves in Southcentral would have no financial impact on hunters and trappers, because wolf pelts are usually not in prime marketable condition prior to November.

Sincerely,

Spencer Lennard  
Williams, OR



Feb. 26, 2013

Dear Board of Game Members:

**We strongly support Proposals 172, 173 and 174** which would prohibit the hunting and trapping of wolves in all areas of Southcentral annually from March 1 until November 1 and would ban grizzly and black bear snaring in the Southcentral region.

**172:** In some areas current regulations allow wolves to be hunted and trapped after March 1, when females may be pregnant (& their coats may be in less than prime condition). In other areas hunting and trapping is allowed before November 1, when wolf pups are dependent on adults in their pack for survival.

It is unethical and inhumane to allow the killing of wolves while the pups remain dependent upon the pack. This has the potential to wipe out two generations at once. Additionally, the loss of the pups is not counted in harvest statistics, making accurate population estimates - and future management decisions difficult.

Allowing the take of wolves during pup season is not a sound scientific, biological, ecological, or ethical method of managing this species.

Currently, hunting and trapping regulations in Southcentral are inconsistent. In some areas wolves may be killed before November 1, while pups remain dependent on their parents and the pack. In other areas hunting and trapping is legal after March 1, after mating has occurred and females may be pregnant.

Allowing the hunting and trapping of wolves between March 1 and November 1 means that two generations of a pack likely would be taken at once.

Dependent pups that do not survive are not counted, meaning that a substantially greater number of wolves is lost than is reflected in harvest statistics. This is unscientific and an inaccurate way to manage the wolf population.

Establishing a shorter, standardized season for wolves in Southcentral would have no financial impact on hunters and trappers, because wolf pelts are usually not in prime marketable condition prior to November.

**173, 174:** Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.



Bear snaring is an extremely controversial method of killing animals. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its war on predators. Bear snaring has never been allowed in Alaska since statehood until the BOG approved an experimental program in 2008.

Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage the harvest of females.

Enforcement will be a nightmare for the Alaska State Troopers, who are already stretched thin.

There are the dangers to other consumptive users, hikers and their pets who may come upon a situation where one bear is caught while its siblings or mother remain free in the area, creating the very real possibility of severe injuries or fatalities. The baited traps also create food-conditioned bears, and animals which learn to associate food with humans are a danger to our communities.

Bears have cultural, economic and biological importance to Alaskans. Bear snaring is archaic, cruel and should be banned.

Living bears have a very high value as a tourism draw and a source of revenue. They are almost always cited as one of the "big three" species visitors come to Alaska to see.

**Sincerely,**

**Jeff and Susan Sloss**

**740 5<sup>th</sup> St.**

**Juneau, AK 99801**



To the BOG:

I am writing to inform you of my **support for Proposals 172, 173 and 174** and urge you to vote for such proposals.

172 – there is no reason why wolves should be allowed to be taken between March 1 and November 1. Wolf pups are still dependent upon their parents during this time and wolf hides are not in good marketable condition during this time. Allowing wolves to be taken during this time constitutes a waste of a valuable resource.

173 and 174: the practice of snaring bears should be prohibited. It is un-sportsmanlike, inhumane, not supported by the majority of Alaskans, is wasteful, kills indiscriminately, and is repugnant. Such practice only benefits one user group – hunters.

Brad De Noble

Please Vote "Yes" on Proposals 173 and 174 to Stop Bear Snaring

Vote "Yes" on Proposal 172 to Stop Year-round Wolf Hunting!

*Eileen Bosch*  
*12772 Saratoga-Sunnyvale Rd.*  
*Saratoga, CA. 95070*



I am writing to urge that you vote "YES" to stop bear snaring (173, 174), and "YES" to end year-round wolf hunting (172).

- \* Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.
- \* Bear snaring is an extremely controversial method of killing animals. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its war on predators. Bear snaring has never been allowed in Alaska since statehood until the BOG approved an experimental program in 2008.
- \* Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage the harvest of females.
- \* Enforcement will be a nightmare for the Alaska State Troopers, who are already stretched thin.
- \* There are the dangers to other consumptive users, hikers and their pets who may come upon a situation where one bear is caught while its siblings or mother remain free in the area, creating the very real possibility of severe injuries or fatalities. The baited traps also create food-conditioned bears, and animals which learn to associate food with humans are a danger to our communities.
- \* Bears have cultural, economic and biological importance to Alaskans. Bear snaring is archaic, cruel and should be banned.
- \* Living bears have a very high value as a tourism draw and a source of revenue. They are almost always cited as one of the "big three" species visitors come to Alaska to see.

## **PROPOSAL 172**

It is unethical and inhumane to allow the killing of wolves while the pups remain dependent upon the pack. This has the potential to wipe out two generations at once. Additionally, the loss of the pups is not counted in harvest statistics, making accurate population estimates - and future management decisions - problematical. Allowing the take of wolves during pup season is not a sound scientific, biological, ecological, or ethical method of managing this species.

Currently, hunting and trapping regulations in Southcentral are inconsistent. In some areas wolves may be killed before November 1, while pups remain dependent on their parents and the pack. In other areas hunting and trapping is legal after March 1, after mating has occurred and females may be pregnant.

Allowing the hunting and trapping of wolves between March 1 and November 1 means that two generations of a pack likely would be wiped out at once.



Dependent pups that do not survive are not counted, meaning that a substantially greater number of wolves is lost than is reflected in harvest statistics. This is unscientific and a very poor way to manage the wolf population.

Establishing a shorter, standardized season for wolves in Southcentral would have no financial impact on hunters and trappers, because wolf pelts are usually not in prime marketable condition prior to November.

Margaret McGinnis



Board of Game:

I support proposal 172 which would prohibit the hunting and trapping of wolves in all areas of Southcentral annually from March 1 until November 1.

I also support Proposals 173 and 174 that would ban grizzly and black bear snaring in the Southcentral region.

Mark Luttrell  
Seward, AK

Support 172, 173, 174

Please stop Bear Snaring and Year round Wolf hunting

Just say no, our wildlife doesn't just belong to sportsmen it belongs to all of us, stop caving into special interest groups and start being stewards of wildlife not their gravediggers...

Thank you for myself and all who will come after me in the future.....

Respectfully

Nicholas D. Genera

Washington State



SUPPORT 173, 174

Alaska Board of Game:

Please accept my comments on Board of Game Proposals 173 and 174. I am in support of these two proposals. Having worked as a Wilderness Ranger for the U.S. Forest Service at a bear viewing area, I have experienced firsthand the value that bears have to the general public and as a valuable tourism resource for the State of Alaska. And even more importantly bears represent a vital component of the ecosystems in which they live. I strongly oppose the practice of snaring as it is indiscriminate and can result in an unnecessarily cruel death for any animal. Please seriously consider these views as you evaluate these proposals.

Sincerely,

Dori Broglino  
Douglas, Alaska

SUPPORT PROPOSAL 172

Dear Board of Game:

Please accept my comments on Board of Game Proposals 172. I am in support of this proposal. I believe that the hunting and trapping of wolves in Southcentral should be prohibited from March 1 through November 1 because there may be pregnant females during the spring and in the fall pups are still dependent on the pack. By prohibiting hunting and trapping during this part of the year, the management of this species will be more efficient and based on better population estimates.

Please seriously consider these views as you evaluate this proposal.

Sincerely,

Dori Broglino  
Douglas, Alaska



**SUPPORT 172, 173, 174**

I have owned a remote wilderness lodge since 1974. We serve guests from around the world.

Alaska is known for its unique natural resources. Apparently Gov. Parnell doesn't agree. It is very difficult to explain to our 'outside' guests, the rationale for snaring bears, and year-round wolf hunting.

Please do not join Gov. Parnell in his quest to decimate our natural resources by allowing cruise ships to dump more sewage, to poison our salmon, and of course, there is the ever-present oil giveaway.

Stop bear snaring and stop aerial wolf hunting.

Pat Gaedeke

Iniakuk Lake Wilderness Lodge, LLC

**OPPOSE PROPOSALS 178A, 179A**

I have owned a remote wilderness lodge in the Brooks Range of Alaska since 1974. Your current program to eradicate Alaska's Archipelago Wolves is untenable.

I say NO to plans to start killing Southeast Alaska's Alexander Archipelago Wolves.

Pat Gaedeke

Iniakuk Lake Wilderness Lodge, LLC



**OPPOSE 178A and 179A**

I am writing to you to ask you to save the Alexander Archipelago Wolves. The hatred and fear of wolves has become epidemic and obsessive. The entire species is at risk of annihilation at the whims of humans. Humans are not threatened by wolves...wolves are threatened by humans. Not only do humans satisfy their blood lust by killing them, wolves are threatened by encroachment of wild land on which they raise their young.

Movies and television have portrayed wolves as vindictive killers when in reality the wolves that are pictured are computer generated...not real wolves. Many people equate these portrayals as fact instead of storytelling.

Please do not senselessly kill the Alexander Archipelago Wolves.

Thank you

Florence Stasch

**I am OPPOSED to bear snaring Prop. 173 and 174**

Florence Stasch

**I am OPPOSED to wolf hunting and year round wolf hunting....Prop. 172.**

Florence Stasch



SUPPORT 172, 173, 174

I really would like to see the stopping of both bear snaring (Proposals 173 & 174) and year-round wolf hunting (Proposal 172). I vote "YES" on each proposal. These practices are outdated and barbaric.

Sincerely,

Catherine A Allen  
19181 Randall Rd  
Juneau, AK 99801



**OPPOSE 178A and 179A**

**We vehemently oppose the predator control programs in Southeast AK targeting the Alexander Archipelago wolves, aka "the management experiment." We strongly reject this unscientific, expensive wolf killing "experiment" on the rare Alexander Archipelago wolves!**

**Sincerely,**

**Jeff and Susan Sloss**

**740 5<sup>th</sup> St.**

**Juneau, AK 99801**



Please Vote "Yes" to Stop Bear Snaring (Proposals 173, 174)

Please also vote "Yes" to Stop Year-round Wolf Hunting! (Proposal 172)

Neither one of these are valid game management methods, and do irreparable harm to the environment.

Thank you

Irene Brady



I do not support allowing the commercial hunting industry guides to wipe out wolves and bears in these units:

- UNIT 1A Operational plan for intensive management on wolves and bears
- UNIT 3 Operational plan for intensive management on wolves and bears

**OPPOSE Proposal 178A** Intensive management for UNIT 1A

**OPPOSE Proposal 179A** Intensive management for UNIT 3

I strongly oppose these ideologies ahead introduced by these radicals and extremist sportsmen urban hunters and trappers and these politicians who want to management the wildlife according to their convenience and purposes. It is entirely inappropriate to allow the for-profit commercial guiding industry to conduct intensive predator control! Rationale behind predator control (where it may be necessary) is intended to benefit residents who are dependent upon subsistence. Otherwise predator control is being used to prop up commercial guiding operations to the detriment of the resources and the subsistence users. During the past and present administration wolves and bears are been used as scapegoats to justify their profitable business. Nonresident trophy hunters and fur trapper organizations must be eliminated for big game animals. If there is insufficient game to liberalize harvest, then liberalized harvest should be provided first to residents. Snaring of bears in any other unit, and trapping wolves, is savage, cruel, barbaric, unethical and inhumane. This infamous method of killing wildlife is wrong, since it is commercially motivated. Its time to control these predators: The sportsmen (trophy) hunters, Inside and Outside fur trappers organizations, and the commercial guiding operations. Nowhere in the in Constitution is there provision for commercial exploitation of game; in fact, this is expressly prohibited. Alaska's natural resources belong to all Alaskans not to these politicians and their special-interests. We need diversity on the Board of Game because Alaska is a diverse state. Why does the state and Outdoor urban Sportsmen want to be the only ones to control the Fish and Game Board? Where is the democracy here in the state of Alaska? The tourists come to Alaska to enjoy the landscape and wild animals that we still have here. Tourism brings millions of dollars in revenue to the city and the state of Alaska through hotels, restaurants, shops etc. which benefit the community in general. However the Sportsmen (trophy) hunters and fur trapper organizations only benefit themselves and a few. Don't forget that the natural resources belong to all Alaskans, and the politicians are only public servants who should be working for all Alaskans, not for special-interests who are extracting and exploiting the wildlife to enrich themselves. Politicians should be working and protecting our natural resources for future generations.

Yolanda de la Cruz.  
806 West 57th Avenue  
Anchorage, Ak. 99518



ATTN: Board of Game

I AM in **strong support** for each of the following three proposals:

**Proposals 173 and 174** would ban grizzly and black bear snaring in the Southcentral region.

**PROPOSAL 172** would prohibit the hunting and trapping of wolves in all areas of Southcentral annually from March 1 until November 1. In some areas current regulations allow wolves to be hunted and trapped after March 1, when females may be pregnant. In other areas hunting and trapping is allowed before November 1, *when wolf pups are dependent on adults in their pack for survival.*

Thank you,  
Jed B. Zimmerman



Regarding my **support for Proposals 173 and 174** to ban grizzly and black bear snaring in the Southcentral region:

- \* Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.
- \* Bear snaring is an extremely controversial method of killing animals. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its war on predators. Bear snaring has never been allowed in Alaska since statehood until the BOG approved an experimental program in 2008.
- \* Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage the harvest of females.
- \* Enforcement will be a nightmare for the Alaska State Troopers, who are already stretched thin.
- \* There are the dangers to other consumptive users, hikers and their pets who may come upon a situation where one bear is caught while its siblings or mother remain free in the area, creating the very real possibility of severe injuries or fatalities. The baited traps also create food-conditioned bears, and animals which learn to associate food with humans are a danger to our communities.
- \* Bears have cultural, economic and biological importance to Alaskans. Bear snaring is archaic, cruel and should be banned.
- \* Living bears have a very high value as a tourism draw and a source of revenue. They are almost always cited as one of the "big three" species visitors come to Alaska to see.

**My strong support of PROPOSAL 172** that would prohibit the hunting and trapping of wolves in all areas of Southcentral annually from March 1 until November 1. In some areas current regulations allow wolves to be hunted and trapped after March 1, when females may be pregnant. In other areas hunting and trapping is allowed before November 1, when wolf pups are dependent on adults in their pack for survival.

It is unethical and inhumane to allow the killing of wolves while the pups remain dependent upon the pack. This has the potential to wipe out two generations at once. Additionally, the loss of the pups is not counted in harvest statistics, making accurate population estimates - and future management decisions - problematical.

Allowing the take of wolves during pup season is not a sound scientific, biological, ecological, or ethical method of managing this species.

◆ Currently, *hunting and trapping regulations in Southcentral are inconsistent*. In some areas wolves may be killed before November 1, while pups remain dependent on their parents and the pack. In other areas hunting and trapping is legal after March 1, after mating has occurred and females may be pregnant.



- ◆ Allowing the hunting and trapping of wolves between March 1 and November 1 means that two generations of a pack likely would be wiped out at once.
- ◆ Dependent pups that do not survive are not counted, meaning that a substantially greater number of wolves is lost than is reflected in harvest statistics. This is unscientific and a very poor way to manage the wolf population.
- ◆ Establishing a shorter, standardized season for wolves in Southcentral would have no financial impact on hunters and trappers, because wolf pelts are usually not in prime marketable condition prior to November.

**Lee Ann Stiff** Senior Writer, Marketing  
Santa Barbara, CA



I strongly oppose the killing of the **Alexander Archipelago wolves!!!!** (Proposals 178A 179A)

I believe it to be detrimental and unnecessary. Here are some reasons why:

- Predation by wolves is not the most significant reason for the decline in the Sitka Black-tailed Deer population, as the ADF&G's own studies admit. There are many other factors contributing to the decline, particularly:
  - Loss of habitat because of clear-cut logging, especially of old-growth forests. This causes a decline in the wolf population as well as in the deer population.
  - Severe winter weather, especially three recent deep-snow winters. In fact, the Unit 1A Feasibility Study states "severe winter weather is believed to have the greatest impact on Unit 1A deer populations, often resulting in high rates of mortality."
  - ADF&G does not know the impact of black bear predation on deer fawns, but it cites data from a neighboring area indicating that black bears kill a significant number of fawns. The Feasibility Studies state that black bears have not (yet) been targeted for predator control in Southeast because of their economic value; nevertheless, if the BOG gets a foothold with predator control on wolves in the area, bears would likely be the next target. Given this and many other unknown variables, predator control is not justified for either wolves or black bears. **ADF&G also clearly states that these two "experimental" programs could be used as models for more Alexander Archipelago wolf control programs in Southeast Alaska.**
- The Unit 1A study stated that "we have no research information to accurately estimate wolf...numbers on Gravina Island." The Unit 3 study stated that wolf population counts are not even feasible there. ADF&G is equally unsure how many black bears are in either Unit, and it does not even know how many deer there are. The science is clearly lacking to support any predator control measures.
- ADF&G's preliminary estimates indicated the basic cost for just the predator control program and related deer population studies will be more than \$200,000 per year for five years. In these times of austere budgets, there is certainly a better use for more than a million dollars of state money than to provide easier targets for a small number of deer hunters. Especially because, given the many other factors involved, it seems very unlikely the predator control program will actually result in more deer.
- The studies did not address effects of fewer wolves on the wildlife tourism industry, which benefits local economies when visitors come to catch a glimpse of the rare wolf. Neither did they address the loss of wolf viewing opportunities for non-consumptive users, such as hikers and photographers.

Thank you for taking the time to read this message.

Please make the right choice and **DO NOT KILL THESE WOLVES!!!!!!**

Cassandra McDonnell, Oregon



## **Please do not Start Killing Southeast Alaska's Alexander Archipelago Wolves! (oppose 178A, 179A)**

\* Predation by wolves is not the most significant reason for the decline in the Sitka Black-tailed Deer population, as the ADF&G's own studies admit. There are many other factors contributing to the decline, particularly:

- Loss of habitat because of clear-cut logging, especially of old-growth forests. This causes a decline in the wolf population as well as in the deer population.

- Severe winter weather, especially three recent deep-snow winters. In fact, the Unit 1A Feasibility Study states "severe winter weather is believed to have the greatest impact on Unit 1A deer populations, often resulting in high rates of mortality."

- ADF&G does not know the impact of black bear predation on deer fawns, but it cites data from a neighboring area indicating that black bears kill a significant number of fawns. The Feasibility Studies state that black bears have not (yet) been targeted for predator control in Southeast because of their economic value; nevertheless, if the BOG gets a foothold with predator control on wolves in the area, bears would likely be the next target. Given this and many other unknown variables, predator control is not justified for either wolves or black bears. **ADF&G also clearly states that these two "experimental" programs could be used as models for more Alexander Archipelago wolf control programs in Southeast Alaska.**

\* The Unit 1A study stated that "we have no research information to accurately estimate wolf...numbers on Gravina Island." The Unit 3 study stated that wolf population counts are not even feasible there. ADF&G is equally unsure how many black bears are in either Unit, and it does not even know how many deer there are. The science is clearly lacking to support any predator control measures.

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\* The studies did not address effects of fewer wolves on the wildlife



tourism industry, which benefits local economies when visitors come to catch a glimpse of the rare wolf. Neither did they address the loss of wolf viewing opportunities for non-consumptive users, such as hikers and photographers. **These predator control programs are being called a "management experiment." I strongly oppose this unscientific, expensive wolf killing "experiment" on the rare Alexander Archipelago wolves!**

THANK YOU.

Ellen Mandel



I oppose Proposals 178A and 179A

- Predation by wolves is not the most significant reason for the decline in the Sitka Black-tailed Deer population, as the ADF&G's own studies admit. There are many other factors contributing to the decline, particularly:
  - Loss of habitat because of clear-cut logging, especially of old-growth forests. This causes a decline in the wolf population as well as in the deer population.
  - Severe winter weather, especially three recent deep-snow winters. In fact, the Unit 1A Feasibility Study states "severe winter weather is believed to have the greatest impact on Unit 1A deer populations, often resulting in high rates of mortality."
  - ADF&G does not know the impact of black bear predation on deer fawns, but it cites data from a neighboring area indicating that black bears kill a significant number of fawns. The Feasibility Studies state that black bears have not (yet) been targeted for predator control in Southeast because of their economic value; nevertheless, if the BOG gets a foothold with predator control on wolves in the area, bears would likely be the next target. Given this and many other unknown variables, predator control is not justified for either wolves or black bears. **ADF&G also clearly states that these two "experimental" programs could be used as models for more Alexander Archipelago wolf control programs in Southeast Alaska.**
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- The studies did not address effects of fewer wolves on the wildlife tourism industry, which benefits local economies when visitors come to catch a glimpse of the rare wolf. Neither did they address the loss of wolf viewing opportunities for non-consumptive users, such as hikers and photographers.

Please don't kill these beautiful majestic animals. They belong on the Endangered Species Act. Enough Wolves have been killed already.

Thank you for considering my comments and have a nice day.

Susan Welch  
Marion, IL



## VOTE AGAINST 178A, 179A

- Other countries have learned the hard way that we MUST protect our predator species. Humans are not the way to control populations. These wolves are rare and until now have been protected. As an Alaska enthusiast, I visit Alaska for the wildlife - intact. I do not believe hunting and certainly NOT trapping is anything but sport. And a cruel one at that.
- Predation by wolves is not the most significant reason for the decline in the Sitka Black-tailed Deer population, as the ADF&G's own studies admit. There are many other factors contributing to the decline, particularly:
  - Loss of habitat because of clear-cut logging, especially of old-growth forests. This causes a decline in the wolf population as well as in the deer population.
  - Severe winter weather, especially three recent deep-snow winters. In fact, the Unit 1A Feasibility Study states "severe winter weather is believed to have the greatest impact on Unit 1A deer populations, often resulting in high rates of mortality."
  - ADF&G does not know the impact of black bear predation on deer fawns, but it cites data from a neighboring area indicating that black bears kill a significant number of fawns. The Feasibility Studies state that black bears have not (yet) been targeted for predator control in Southeast because of their economic value; nevertheless, if the BOG gets a foothold with predator control on wolves in the area, bears would likely be the next target. Given this and many other unknown variables, predator control is not justified for either wolves or black bears. **ADF&G also clearly states that these two "experimental" programs could be used as models for more Alexander Archipelago wolf control programs in Southeast Alaska.**
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money than to provide easier targets for a small number of deer hunters. Especially because, given the many other factors involved, it seems very unlikely the predator control program will actually result in more deer.

- The studies did not address effects of fewer wolves on the wildlife tourism industry, which benefits local economies when visitors come to catch a glimpse of the rare wolf. Neither did they address the loss of wolf viewing opportunities for non-consumptive users, such as hikers and photographers.

**These predator control programs are being called a "management experiment." I strongly oppose this unscientific, expensive wolf killing "experiment" on the rare Alexander Archipelago wolves!**

**A concerned citizen,  
Janice Greenberg**



## Alaska Board of Game,

### **Please Vote "Yes" to Stop Bear Snaring (173, 174) and "Yes" to Stop Year-round Wolf Hunting (172).**

**PROPOSAL 172** would prohibit the hunting and trapping of wolves in all areas of Southcentral annually from March 1 until November 1. In some areas current regulations allow wolves to be hunted and trapped after March 1, when females may be pregnant. In other areas hunting and trapping is allowed before November 1, when wolf pups are dependent on adults in their pack for survival.

It is unethical and inhumane to allow the killing of wolves while the pups remain dependent upon the pack. This has the potential to wipe out two generations at once. Additionally, the loss of the pups is not counted in harvest statistics, making accurate population estimates - and future management decisions - problematical.

Allowing the take of wolves during pup season is not a sound scientific, biological, ecological, or ethical method of managing this species.

1. Currently, hunting and trapping regulations in Southcentral are inconsistent. In some areas wolves may be killed before November 1, while pups remain dependent on their parents and the pack. In other areas hunting and trapping is legal after March 1, after mating has occurred and females may be pregnant.
2. Allowing the hunting and trapping of wolves between March 1 and November 1 means that two generations of a pack likely would be wiped out at once.
3. Dependent pups that do not survive are not counted, meaning that a substantially greater number of wolves is lost than is reflected in harvest statistics. This is unscientific and a very poor way to manage the wolf population.
4. Establishing a shorter, standardized season for wolves in Southcentral would have no financial impact on hunters and trappers, because wolf pelts are usually not in prime marketable condition prior to November.

**Proposals 173 and 174** would ban grizzly and black bear snaring in the Southcentral region.

1. Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.
2. Bear snaring is an extremely controversial method of killing animals. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its war on predators. Bear snaring has never been allowed in Alaska since statehood until the BOG approved an experimental program in 2008.



3. Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage the harvest of females.
4. Enforcement will be a nightmare for the Alaska State Troopers, who are already stretched thin.
5. There are the dangers to other consumptive users, hikers and their pets who may come upon a situation where one bear is caught while its siblings or mother remain free in the area, creating the very real possibility of severe injuries or fatalities. The baited traps also create food-conditioned bears, and animals which learn to associate food with humans are a danger to our communities.
6. Bears have cultural, economic and biological importance to Alaskans. Bear snaring is archaic, cruel and should be banned.

As an avid wildlife photographer having the ability to photograph a bear or a wolf in the wild is the main reason we visit Alaska. Removing these species makes absolutely no economic sense.

Thank you

Mark Balitzer  
San Diego, Ca



## OPPOSE PROPOSALS 178A &amp; 179A

I strongly oppose the experimental Alexander Archipelago wolf control programs that you are thinking of implementing for the following reasons.

Predation by wolves is not the most significant reason for the decline in the Sitka Black-tailed Deer population, as the ADF&G's own studies admit. There are many other factors contributing to the decline, for example, The loss of habitat because of clear-cut logging, especially of old-growth forests. This causes a decline in the wolf population as well as in the deer population. Severe winter weather, especially three recent deep-snow winters. In fact, the Unit 1A Feasibility Study states "severe winter weather is believed to have the greatest impact on Unit 1A deer populations, often resulting in high rates of mortality."

ADF&G does not know the impact of black bear predation on deer fawns, but it cites data from a neighboring area indicating that black bears kill a significant number of fawns. The Feasibility Studies state that black bears have not (yet) been targeted for predator control in Southeast because of their economic value; nevertheless, if the BOG gets a foothold with predator control on wolves in the area, bears would likely be the next target. Given this and many other unknown variables, predator control is not justified for either wolves or black bears. **ADF&G also clearly states that these two "experimental" programs could be used as models for more Alexander Archipelago wolf control programs in Southeast Alaska.** The Unit 1A study stated that "we have no research information to accurately estimate wolf...numbers on Gravina Island." The Unit 3 study stated that wolf population counts are not even feasible there. ADF&G is equally unsure how many black bears are in either Unit, and it does not even know how many deer there are. The science is clearly lacking to support any predator control measures. ADF&G's preliminary estimates indicated the basic cost for just the predator control program and related deer population studies will be more than \$200,000 per year for five years. In these times of austere budgets, there is certainly a better use for more than a million dollars of state money than to provide easier targets for a small number of deer hunters. Especially because, given the many other factors involved, it seems very unlikely the predator control program will actually result in more deer. These studies did not address effects of fewer wolves on the wildlife tourism industry, which benefits local economies when visitors come to catch a glimpse of the rare wolf. Neither did they address the loss of wolf viewing opportunities for non-consumptive users, such as hikers and photographers.

**I strongly oppose this unscientific, expensive wolf killing "experiment" on the rare Alexander Archipelago wolves!**

Mark Balitzer  
San Diego, Ca



Dear AK Board of Game:

We **STRONGLY SUPPORT Proposals 173 and 174**, to ban grizzly and black bear snaring in the Southcentral region.

- Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.
- Bear snaring is an extremely.
- Bear snaring is indiscriminate and has never been allowed in Alaska since statehood and was approved by the BOG as an experiment.
- Bears have cultural, economic and biological importance to Alaskans. Bear snaring is archaic, cruel and should be banned.
- Living bears have a very high value as a tourism draw and source of revenue. They are almost always cited as one of the "big three" species visitors come to Alaska to see.

We **STRONGLY SUPPORT Proposal 172** which would prohibit the hunting and trapping of wolves in all areas of Southcentral annually from March 1 until November 1.

- It is unethical and inhumane to allow the killing of wolves while the pups remain dependent upon the pack. This can wipe out generations and entire packs at once. Allowing the take of wolves during pup season is not a sound scientific biological, ecological, or ethical method of managing this species.
- Dependent pups that do not survive are not counted, meaning a substantially great number of wolves is lost than is reflected in the harvest (nee 'slaughter') statistics. This is in scientific and very poor management of the wolf population.
- Establishing a shorter, standardized season for wolves in Southcentral would have no financial impact on hunters and trappers, because wolf pelts are usually not in prime marketable condition prior to November.

Your votes will impact our (and many other people's) planned and future vacations to the beautiful state of Alaska.

We **STRONGLY URGE** you to **VOTE YES** to **STOP** Bear Snaring and **YES** to **STOP** Year Round Wolf Hunting.

Thank you for your time and consideration.

Sincerely,

Don and Sharon Samuelson  
26011 31st Street  
Salem, WI 53168



Dear Board Of Game:

I am opposed to bear snaring and year-round wolf hunting.

**Please vote YES on Proposals 173 and 174** to stop bear snaring.

I believe it is cruel and dangerous practice to bait bears and snare them. This can create unusual situations in the event of a mother of cubs being ensnared, or cubs being ensnared. The baiting of bears is just unethical and unfair.

**Please vote YES on Proposal 172** to stop year round wolf hunting.

I believe that year round wolf hunting is also unethical and presents imbalanced effects on wolf populations due to the impact on killing pregnant females and causing orphaned pups that can result. Moderation is always my vote.

Thank you for considering my views and please prove that considered careful thought and ethical treatment of animals still exists in Alaska government by voting yes on these proposals: 172,173,174.

Thank you,

Carol Hazeltine  
3200 Staysail Drive  
Anchorage, Alaska 99516



Board of Game Members:

**I SUPPORT the approval of Proposal 172** to prohibit the hunting and trapping of wolves in all areas of Southcentral Alaska annually from March 1 to November 1.

1. Hunting during this time of year of these predators for whatever supposed reasons is unnecessary and prone to taking multigenerational animals when targeting the females.
2. Pelts taken during this time are of less than prime marketable condition.
3. I am an Alaskan who has hunted and is against the taking of these predators simply to make it easier for hunters to bag easy kills of moose, etc.

**I SUPPORT the approval of Proposals 173 and 174** which would ban grizzly and black bear snaring in the Southcentral region.

1. I agree with the scientific community that have overwhelmingly stated that bear snaring is indiscriminate, cruel and not biologically sustainable.
2. I totally disagree with any use of snaring be allowed anywhere in Alaska.
3. Snaring can be totally indiscriminate, taking pets, children, sows and other animals.
4. Snaring with bait stations creates food-conditioned bears, for those that avoid the snares, which in and of itself is then a major threat to local communities and need not be.

Thank you for considering my comments,

Michael K. Adams, EIT, AIA *Engineering Technician*  
9101 Vanguard Drive  
Anchorage, Alaska 99507



**Please Please Please Vote "Yes" to Stop Bear Snaring and "Yes" to Stop Year-round Wolf Hunting! (Proposals 172, 173, 174)**

**Thank you!**

**Krissy Machon**



## **OPPOSE PROPOSALS 178A, 179A**

**Feb. 28, 2013**

**Dear BOG,**

**What in the world are you thinking? Alexander Archipelago wolves are very rare. It's unreasonable to blame them for low deer numbers. There has been record deep snowfall for the last 3 years. Deer cannot survive in deep snow without cover of old growth forests and big downed trees. The snow and extensive old growth clear-cuts have surely diminished deer numbers if in fact they even are diminished, because there have been little or no scientific surveys to find out what their numbers are or predator numbers either.**

**Trapping is extremely cruel, a form of animal abuse that causes extensive suffering. You will have very little success and will show the world how foolish unscientific predator control really is with no sound science to back you up.**

**As an avid visitor to Southeastern Alaska who loves the sound of wolves howling and to see bears, deer, salmon and moose, please do some research before wiping out entire populations of wolves in our recreational areas. You might learn the truth if it's the deer you want to save. All wildlife need healthy ecosystems for healthy populations.**

**Thank you,**

**Marcia Denison  
618 Gamble #18  
Anchorage, Alaska, 99501**



Support 172, 173 and 174

This is a letter to voice my support for **proposals 173 and 174** prohibiting bear snaring and proposal 172 prohibiting year-round wolf hunting in Alaska.

Scientists and most ethical human beings overwhelmingly agree that bear snaring is indiscriminate cruel and biologically unsustainable. The indiscriminate killing of wildlife, pets, not to mention the sight of a snared mother bear with surrounding cubs severely tarnishes Alaska's image and reputation as a state that cherishes its wildlife and wilderness heritage.

There's also some inherent danger in having a young bear snared and a mother desperately trying to help her cub.... this could result in the attack on an accidental intruder at the scene.

This does not take into account the cruelty of bear snaring which is archaic and should be banned.

Finally, living bears have a very high value as a tourism draw and source of revenue. This heinous way of killing them will no doubt affect the tourism industry.

Regarding **proposal 172**. It is unethical and inhumane to allow the killing of wolves while the pups and young wolves remain dependent on the pack. Indeed this type of killing could wipe out generations of wolves.

It could also affect population estimates and future management decisions making them inaccurate.

Finally, establishing a shorter standardized season for wolves in southcentral Alaska would have no financial impact on hunters because the wolf pelts are usually not in prime marketable condition prior to November.

Again I am strongly in favor of proposal 172 in that it is based on sound scientific humane and ethical rationale.

Ingrid de Baintner MD  
Boston, MA



Oppose 178A & 179A

I'm writing this letter to protest the planned predator control programs targeting the Southeast Alaska's rare Alexander Archipelago wolf! It is extremely disturbing to yet have to write another letter to the board of game about this issue despite the fact that there's NO scientific evidence to propose this type of draconian measure.

Unfortunately this "kangaroo court " recommended "feasibility studies" which ultimately apparently proposed the experimental killing of this rare wolf .This in itself to me is egregious. (The board of game does not have a stellar reputation as an enlightened humane and I might say ethical organization.... indeed its reputation is ready sordid ranging back many, many years.)

The Alexander Archipelago wolf is found in old forests only, namely those of Southeast Alaska and British Columbia. The current estimates are thought to be no more than 900 and an attempt to list them as endangered is still under scrutiny by the United States dept of the interior. Apparently there has been some political wrangling and no decision has come forth as of yet. What apparently the BOG is trying to do is to take advantage of this time hiatus!

It appears that the predation on the Sitka black tailed deer is far more complex than the ADF&G is willing to admit. Loss of habitat, severe winters and cyclic variation are but a few reasons why this may be happening. One should also mention excessive hunting. Indeed there is no real way of accurately assessing the number of wolves in this area and the current estimates may be quite erroneous.

It should be noted that studies have shown that the average wolf consumes the equivalent of approximately 1 to 2 deer over the four to five-month period encompassing a winter (personal communication Dr. Theberge, 1996), indeed other studies indicate that it may take up to a day or 2 for a wolf to kill a large ungulate. Some studies have shown that up to 25 to 30% of trapped wolves have evidence of skull fractures once they are autopsied. These are no doubt related to hoof impact. Thus a high mortality for small rations!

In addition, wolves play an important part in maintaining the health of the ecosystem let alone the deer herd in that they predate on the old and infirm usually. Thus the impact that wolves have on the Sitka deer is somewhat suspect and open to question.

With all these factors at play, BOG should not engage in this wolf slaughter. If they do pass this proposal it is suspect and obviously political because it makes no scientific sense and is unethical.

Please do the right thing....

Ingrid de Baintner MD  
Boston, MA



I strongly oppose proposals 178A, 179A

As a taxpayer, tourist, wildlife lover and ethical human being I oppose your experimental management plan for the rare Alexander Archipelago wolves.

The ADF&G states there are other factors in the decline of the Black Tailed Deer population such as loss of habitat, severe winters (3 the past 3 years) and black bears, with weather having the most severe impact.

**It is incomprehensible to me that the study for unit 1 A study acknowledges lack of research information about numbers of wolves on on Gravina Island. The ADF&G says it is equally unsure as to the number of black bears and deer in either unit 1 or 3. but wants to kill wolves. How scientific is that!!!**

As a visitor to Alaska I oppose any measures to deprive myself and others of wolf viewing opportunities. These wolves are close to being placed on the endangered list. Please do not allow this unethical killing of one species to benefit another with the results uncertain.

Sincerely, Judy Jarrett Springfield, Oregon.



Please oppose #s 178A and 179A.

I beg you to please stop the proposal of the hunt on the black wolf. Killing one species for another is not a solution. Man does more harm to the ecological system than nature alone will do. All man will do is extinguish the black wolf like they had nearly destroyed the buffalo, the timber wolf here in Wisconsin.. and so many other animals.

All creation is in a balance set by nature and nature will take care of itself!!!! The evidence of man's intervention is that involvement by humans has failed horribly.

Trust in nature to do what it needs to do!! Please.... for once it is right for man to stand down!!

Wendy Schraml-Nelis



Alaska Board of Game –

Please oppose Proposals 178A and 179A.

I am a small business owner in Corvallis Oregon. As a jewelry store owner I rarely have time to travel. I am nearing retirement age, and when I go out of business I intend to have a big sale and cash in the gold inventory we have amassed over the years. This will give me the opportunity to travel.

I want to maintain a small carbon footprint, but I do intend to travel to destinations within reach, especially if I can carpool and travel with others. One of my first destinations would be Southeast Alaska. I am fascinated by the opportunity to tour the islands, view wildlife and old growth forests, hike, and birdwatch.

I have never seen a wolf in the wild. I find it seriously objectionable that before wolves have even been permanently reintroduced in Oregon and Washington that the Alaska Board of Game intends to annihilate populations in the Alexander Archipelago with no scientific evidence that they are impacting deer populations.

Please consider making wildlife tourism a first priority and recognize the fact that clearcutting old growth forests has a deleterious effect on both wolves and game animals.

Thank you

Reed M. Wilson  
203 SW 2nd  
Corvallis OR 97333



**In support of proposal 173, 174, submitted to ban the snaring of bears.**

**In support of proposal 172 to limit the season on wolf hunting and trapping.**

I have lived in Alaska for 19 years. I am a homeowner in Kenai and in Anchorage. It is troubling to witness this aggressive turn the BOG is taking towards predators.

Kris Simon is a lifelong resident (born in Fairbanks) and he is a hunter and fisherman. It also should be pointed out that when the state was ratified, Alaska's forefathers were against the use of bear snaring.

Sincerely,

Maryann and Kris Simon

7721 Port Orford  
Anchorage 99507



Dear Sirs:

Please Vote YES (Support)--Proposal 173/174---Stop Bear Snaring

Please Vote YES (Support)--Proposal 172---Stop Year-round wolf hunting.

Thank-you.

Louis D. Rhodes, Jr.  
P.O. Box 858  
Bluffton, SC 29910



Do not accept Proposals 178A and 179A

I beg you not to accept two proposed predator control programs targeting some of Southeast Alaska's rare Alexander Archipelago wolves for the sole purpose of increasing the population of Sitka Black-tailed Deer.

Such predator control programs are expensive, ill-advised, unscientific and will pose a great threat of extinction for the rare Alexander Archipelago wolves

Sincerely,  
Edda Harris,  
Roma, Italia



### **Proposals 172, 173 & 174**

This is a note from as far as South Africa. Please put an end to bear snaring and to year round wolf hunting.

I am sure that you are aware of how a great deal of the world's population is very much against hunting and animal torture. If you were at all concerned about what the rest of the world has to say, then you will take their opinions to heart, and hear our requests to please put an end to the torture.

This planet does not belong to governments and officials in high places, regardless of whether or not they think it is. It belongs to all that live on this planet, and we all have the right to make decisions.

If a vote was to be taken, everyone would be able to see the pro-hunting minority probably only stands at about 10% of the world's population. We the 80% (10% are still neutral because they have not been educated) want this to end. You do have to hear us, sooner or later.

Please stop bear snaring and year round wolf hunting - in fact, please ban hunting all together and begin to manage wildlife in a civilized/humane manner - if you intend to see a planet worth residing on.

Yours sincerely,

Carly van Heerden  
South Africa



## VOTE NO ON PROPOSALS 178A & 179A

Please do not accept two proposed predator control programs targeting some of Southeast Alaska's rare Alexander Archipelago wolves for the sole purpose of increasing the population of Sitka Black-tailed Deer.

These predator control programs are expensive, ill-advised, unscientific and will pose threat of extinction for the rare Alexander Archipelago wolves

Sincerely,

Francesca Flore,  
Rome, Italy



Proposals 178A and 179A ---- OPPOSE

What you are planning makes no sense. You should be ashamed of yourselves for proposing an idea like this. When will our country come to their senses and stop this horrible killing of Wolves. I'm ashamed on all of these hunters that take pride in what they are doing and you even plan to go further. Is there no common sense in the USA anymore? Shame on you!

Donaree Brannon



I oppose Proposals 178a and 179a

My name is Jennifer & I am very concerned with what is going on with the plans to kill Alexander Archipelago wolves, there is no scientific evidence saying it's because of them that the Sitka Black Tailed deer are in decline.....there HAS to be some happy medium everyone can come to so this killing does not happen...there's too many deer.

We have a white tailed deer problem in PA because there are no predators except for the SUV!!!

Leave the wolves be...they bring in money from tourists wanting to see them too!!

It's not a one way deer street.

Regards

Jen Cerene  
Pennsylvania



## Support Proposals 173 and 174

I am a student all the way in Colorado and I strongly support the ban on grizzly and black bear snaring. It could be a tragedy for multiple generations of bears, and it is a really cruel activity. I am so glad there is finally a proposition to ban this disgusting act.

Alaska is currently on the list of states (along with Montana and Idaho) that my family and I refuse to visit and contribute to state tourism due to controversial allowances on wolf hunting, but if this proposition gets more support, Alaska will definitely earn more respect in my mind. Alaska needs to take better care of its animals, or the results will be devastating.

Thank you

Jenna Lente



## SUPPORT Proposal 173 and 174

As both a consumptive (I eat wild moose, fish and sheep) and a non-consumptive (I photograph wildlife and lead outside tourists on photo tours of Alaska and it's Wildlife), user of Alaska wildlife resources I am in favor of Proposals 173 and 174 to stop bear snaring in Alaska. The practice of bear snaring is a danger to public safety, inhumane, cruel, and it gives Alaska and Alaskan wildlife managers a black eye in the national perspective. The practice of bear snaring has not been allowed since Alaska statehood for good reason, it is an archaic form of predator control that has not been used anywhere else since the early 20<sup>th</sup> century!

If bear snaring is not stopped it is only a matter of if, not when a human will be mauled by a food conditioned bear, perhaps with fatal consequences. I hope the BOG is ready to take responsibility for this tragedy when it happens. Bear baiting is already creating food conditioned bears in areas where multiple users are in the backcountry and is also a tragedy waiting to happen, do not make this situation worse.

When is the BOG going to take ALL Alaskans into consideration when formulating game management policy? Start thinking about all Alaskans and all users of Alaska's Wildlife resources and approve Proposals 173 and 174.

Sincerely

Hugh Rose

Hugh Rose Photography  
620 Yak Rd  
Fairbanks Alaska 99709



## **SUPPORT Proposal 172**

I am writing to support Proposal 172 to stop wolf trapping between March 1 and November 1 in Alaska. Trapping wolves in the between March 1 and November 1 is an unethical and highly damaging practice to wolf populations.

I am not suggesting that all wolf trapping be stopped, but only to have a closed season between March 1 and November 1. It is critical for wolves to not have trapping pressure during these months as they are actively denning, and raising pups. Wolves are a critical resource to the state of Alaska both for trappers (who depend on harvesting the fur of wild wolves) and for non consumptive users who wish to observe and photograph wild wolves.

A wolf trapped between March 1 and November 1 does not have a high quality fur, and therefore is of little or no value to legitimate trappers. Additionally wolf populations need these months off from trapping pressure in order to successfully raise their pups.

Having wolf season open all year long also has a high likelihood of creating conflict between different users of Alaska's State and Federal land. Between March 1 and November 1 there are many people in the backcountry skiing, hiking and doing other things that may inadvertently stumble into traps or have pets that end up in traps. Please approve Proposal 172 at your next meeting in March in Kenai.

Sincerely

Hugh Rose

Hugh Rose Photography  
620 Yak Rd  
Fairbanks Alaska 99709



Dear Board of Game,

**I OPPOSE PROPOSALS 178A and 179A.**

In reading about the new intensive management proposals directed at the Alexander Archipelago wolves in units 1A and 3, I find myself worried about the loss of a rare and beautiful species.

The proposal of "Experimental Killings" and the neglect of important scientific findings is appalling. The drop in the Sitka Black-tailed Deer population cannot be largely due to a small population of wolves. This decline has much more to do with the climate and loss of habitat due to clear-cut logging, which also has caused a decline in the population of wolves you think are the root of the problem.

Instead of killing the few Alexander Archipelago wolves that still exist today, we should reflect on our actions as a race. Maybe implementing better forestry management or other methods for harvesting trees and land that would promote the Sitka Black-tailed Deer population to flourish again.

Killing off an endangered species is not the solution. It will only cause a greater imbalance in the beautiful Alaskan ecosystem.

Sincerely,

Bailey Fay



## **OPPOSE PROPOSALS 178A & 179A**

As a US citizen, I am very concerned that the interests of hunters are superseding those of most Americans. The Alexander Archipelago wolf is a rare species that needs to be protected by the Endangered Species Act. The fact that Alaska is considering opening hunting season on these animals- vital to the balance of the local ecosystem- for the sake of deer populations is absurd.

These wolves deserve full and immediate protection via the ESA. In the interim, no hunting of them should be allowed.

What would America be without its top predators? A petting zoo?

Best Regards,

Jana Victoria Menard



I strongly urge you to support Proposals 173 & 174 banning Grizzly and Black bear snaring. I also urge you to support Proposal #172 which bans hunting and trapping of wolves from the March 1st until Nov 1st.

Reta Hanks  
Carson City, NV



**Dear Board of Game,**

**As a lover of Alaskan wildlife, I urge you REJECT props 178A and 179A.**

**There are thousands of wildlife enthusiasts like myself who OPPOSE this experimental killing of the rare and beautiful Alexander Archipelago wolves. Please don't make this rare wolf disappear.**

**Extinction is forever.**

**Sincerely,**

**Beth C. Katte  
Los Angeles, CA**



*178A and 179A -- OPPOSE*

I strongly oppose the ridiculous idea of killing the Alexander Archipelago wolves for the purpose of increasing the population of Sitka Blacktailed Deer.

Humans cannot help the ecosystem and this is totally going against science. We have to accept the fact we can't improve Mother Nature's job and we need to let things be. This is strictly so hunters have more game to shoot, it isn't because the wolves are killing them all.

In all their history, there has never been a case of wolves killing all their prey, man is the only predator that does that. Loss of habitat seems to be the problem with most animals losing numbers. These deer live in old growth forests and maybe clear cutting has something to do with it.

Once these rare wolves are gone, its over and it only takes one disease to wipe them out forever. All wolves serve a unique purpose in the ecosystem and they need to stay, they pretty much control their own numbers, in years with a lot of prey, a lot of pups are born, in yrs w/less prey, less are born.

Kathleen  
Cheatham



Dear members of the Board of Game,

I am strongly opposed to proposals 178A and 179A.

I am concerned about the population viability of the rare Alexander Archipelago wolves. Today's wildlife face many obstacles that can interfere with a stable population. Habitat loss, erratic weather events, reduced food sources are just a few obstacles worth mentioning. Please don't add more obstacles that will hinder an already reduced wolf population.

Thank you for your time.

Carla Porter.



OPPOSE PROPOSALS 178A and 179A

To whom it may concern,

I beg you not to approve the senseless destruction of the Alexander Archipelago wolves. They are a rare group of wolves and should be preserved, not destroyed.

All too often, the people of this world give out death sentences to this species or that, without spending the time to find other alternatives. There is always another way. One must commit to spending the time and they will find it. When one species is in trouble, it may seem like a quick and easy "fix" to kill some other species to save them, but that is not the answer. It only creates more problems down the road.

I beg you not to kill any of these wolves. You are all intelligent human beings. Please find another way.

Thank you for your time,

Shellie Pinter  
A concerned citizen of the USA



OPPOSE 178A and 179A

Alaska Board of Game,

Please oppose the killing the wolves of the Alexander Archipelago.  
Predators keep a healthy balance in the ecosystem. Please keep wolves healthy in the wild.

Sincerely,

Regina Case  
4127 Soule St  
Eureka, CA 95503



**Please SUPPORT Proposals 172, 173 and 174.**

### **PROPOSALS 173, 174**

There are scientifically backed reasons to support these proposals. Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable. Bear snaring is an extremely controversial method of killing animals. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its war on predators. Bear snaring has never been allowed in Alaska since statehood until the BOG approved an experimental program in 2008.

Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage the harvest of females.

Enforcement will be a nightmare for the Alaska State Troopers, who are already stretched thin. In addition, there are the dangers to other consumptive users, hikers and their pets who may come upon a situation where one bear is caught while its siblings or mother remain free in the area, creating the very real possibility of severe injuries or fatalities. The baited traps also create food-conditioned bears, and animals which learn to associate food with humans are a danger to our communities.

Bears have cultural, economic and biological importance to Alaskans. Bear snaring is archaic, cruel and should be banned.

Living bears have a very high value as a tourism draw and a source of revenue. They are almost always cited as one of the "big three" species visitors come to Alaska to see.

### **PROPOSAL 172**

It is unethical and inhumane to allow the killing of wolves while the pups remain dependent upon the pack. This has the potential to wipe out two generations at once. Additionally, the loss of the pups is not counted in harvest statistics, making accurate population estimates - and future management decisions - problematical.



Allowing the take of wolves during pup season is not a sound scientific, biological, ecological, or ethical method of managing this species. Currently, hunting and trapping regulations in Southcentral are inconsistent. In some areas wolves may be killed before November 1, while pups remain dependent on their parents and the pack. In other areas hunting and trapping is legal after March 1, after mating has occurred and females may be pregnant.

Allowing the hunting and trapping of wolves between March 1 and November 1 means that two generations of a pack likely would be wiped out at once. Dependent pups that do not survive are not counted, meaning that a substantially greater number of wolves is lost than is reflected in harvest statistics. This is unscientific and a very poor way to manage the wolf population.

Establishing a shorter, standardized season for wolves in Southcentral would have no financial impact on hunters and trappers, because wolf pelts are usually not in prime marketable condition prior to November.

Very Truly yours,

Debbie Brush  
Castle Rock, Colorado 80104



Proposal 172: SUPPORT

This proposal would limit hunting and trapping wolves during pup season. Such activity which is currently allowed in some regions is unethical, inhuman and unscientific (pups affected are not reflected in harvest statistics).

Proposal 173 & 174: SUPPORT

This proposal would respectively ban snaring of grizzly and black bears in the Southcentral region.

Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.

Bear snaring also put visitors - both consumptive and non-consumptive - as well as their pets in danger of serious injury.

Andrew Gach

3431 Milk Creek Court

Port Angeles, WA 98362



## OPPOSE PROPOSAL 178A and PROPOSAL 179A

I am writing once again to strongly **oppose** the BOG unscientific, expensive wolf killing "experiment" on the rare Alexander Archipelago wolves!

ADF&G's preliminary estimates indicated the basic cost for just the predator control program and related deer population studies will be more than \$200,000 per year for five years. In these times of austere budgets, there is certainly a better use for more than a million dollars of state money than to provide easier targets for a small number of deer hunters.

Especially because, given the many other factors involved, it seems very unlikely the predator control program will actually result in more deer. Stop wasting Alaska's money for hunters!!

Susan Vogt  
269 Bias Dr  
Fairbanks, AK 99712



Oppose 178a and 179a

Alaska's wolves, as elsewhere, play an important role in maintaining healthy prey populations in ecosystems that they inhabit. They are also vital to the state's tourism economy: People from all over the world go to Alaska for the opportunity to see the beauty of a majestic, wild wolf.

Removing keystone predators such as wolves can cause long-term damage to fragile forest ecosystems. Idaho and Wyoming are now looking to Alaska to justify beginning wolf hunting programs of their own. Where will these beautiful creatures be in ten years? Will they even be here? Is it right to destroy this heritage to next human generations?

Wolves are peaceful animals. Why should they be murdered??

Wolves don't attack humans, so why attack animals which can't defend themselves? There is no sport in shooting an animal that is running away from you.

Sincerely

Wildlife Supporter  
Anna Laura Ranazzi



Oppose Proposals 178A & 179A

To BOG, Alaska:

I am familiar with proposals in various States over the past decade or two related to the elimination of wolves because – as is speculated by those who would eliminate them - of their predation affecting the numbers of other groups of animals. However, serious studies have repeatedly demonstrated that elimination of wolves will NOT affect other species, and does not justify the amount of funds needed to implement this proposal in Southeast Alaska.

In addition, Alaska's major sustainable source of income is tourism. My personal experience with responses to the State of Alaska's proposals and policies concerning killing various species of wild animals (without adequate reason), aerial hunting, etc., has demonstrated over and over a great deal of hostility from many people I know in the lower '48 in addition to a general negative response of Europeans to these measures.

In fact, indication has been made to me to the effect that – to paraphrase – "Why would I want to visit a State that is so determined to eliminate that by which it has become a tourist draw?" – "that" referring to our wildlife. Yes, we should not willy-nilly implement policies and procedures from those who live outside the State; however, the decline of tourism would greatly affect so many areas that make up the economy of Alaska.

To eliminate a species of animals just to accommodate the wishes and desires of a small group of hunters taints the image of Alaska for those who live outside it – prospective tourists.

Thank you for the opportunity to submit these comments.

Paula Beneke  
2101 W. 29<sup>th</sup> Ave. #11  
Anchorage, AK 99517



Oppose Proposals 178A and 179A

I would like to voice my opposition to wolf predator control in SE Alaska.

Barbara Winkley  
8120 Rabbit Creek Rd.,  
Anchorage, Alaska 99516



OPPOSE 172, 173, and 174

I am writing this to be a voice for the wolves and bears in Alaska. It has been drawn to my attention the senseless killing of these animals in such a very cruel and inhumane way. I ask that you ban the snaring of black bears and grizzlies and the senseless killing of wolves all year long.... Really!

My husband and I have chosen to make Alaska our vacation destination for the last 9 years and to hear what you are doing to your wolves and bears is horrible, putting it mildly. One of the greatest draws the visitors we visit with each year is the chance to see in the wild a wolf or bear. I believe if the tourist saw how you killed these animals, preying on pregnant wolves or killing the mothers while dependant pups starve to death they would be appalled, not to mention how you kill the bears for management control.

Yes! I understand we who visit Alaska are not in the trenches but the population who does, knew when they moved to Alaska the predators were there and that is a part of living in Alaska. The vast number of locals we have talked to and after 9 trips that has been a lot - they are have learned to live with these great animals.

I strongly "**oppose**" proposals 172, 173 and 174. Save these magnificent animals and stop this cruel and inhumane practice.

Lynda Squire  
2240 Wilmington Dr  
Boise, Idaho 83704



OPPOSE 178A and 179A

Please let the BOG know that myself and all my friends are NOT going to Alaska until the killing of wolves ceases. How many eco-tourists are the equal of a hunter?

Michael Banks



Support 172, 173, & 174

**172:** we support this proposal primarily because hunting wolves between March 1st and November 1st does not fall inside the ethical boundaries of "sport hunting" because the animals are being hunted for only one reason and that is so the state can divorce itself from the act of predator control. The wolves themselves have no value at that time and pregnant females are about to give birth.

**173 & 174:** bear snaring should be banned for both brown and black bears. It is indiscriminate, cruel, immoral, and impacts a resource that is commercial valuable to our tourism industry.

I worked for ADF&G and have witnessed first hand the impacts of bear snaring and it is an archaic & cruel form of predator control. If the bears have been in the snares for very long they are either completely defeated emotionally and physically and the area around the snare site looks like a war zone, or they aren't in the snare any longer because they chewed their foot off to get away.

I'm sure you all heard or even saw the film about the real life experience of a rock climber who was climbing alone, fell and got stuck between some boulders? Who had to cut his arm off with a small knife to get away. Bear snaring is exactly the same. Don't impose that fate on any of our bears any longer.

Sincerely,

John Hyde  
PO Box 34517  
Juneau, Alaska 99803



## **Oppose 178A and 179A**

Predator control itself is an archaic form of wildlife management and to promote its use in an area that is not populated heavily by humans who compete for many of the same resources is even more so. Alexander Archipelago wolves, living in SE Alaska, are defined by the territory they live within, because each is surrounded by extensive bodies of water. Nature takes care of itself in such environments if we adopt a hands-off policy and deer are much more efficient swimmers and are therefore more adept at redistributing themselves - moving to new locations when they find their survival threatened. Wolves are not, so when they run out of food\_ prey\_ they starve to death. Keeps things in balance as long as we don't mess that up.

The deer population in SE Alaska dwarfs the human population and there are plenty of deer for both wild predators and people. Very few of those who claim to live subsistence lifestyles truly depend on the deer they hunt each season and even if they do they can be provided access if necessary by limiting access by sport hunters for a short time. The killing of wolves is not necessary and puts the deer in danger of overpopulation issues\_ to the point where their habitat can't support their numbers resulting in many more deer succumbing to starvation over a hard winter than normally would have been the case.

The impacts of black bear predation on deer (fawns primarily) when considered with those made by wolves together hasn't been determined by any research but what has been is the impact that black bears make on wolf pups. Research that has already been conducted in SE has determined that predation by black bears on wolf pups contributes substantially towards controlling the numbers of wolves! If wolves are depleted from these areas then black bears would be forced to depend on other prey such as deer during the Spring season. If these interrelationships are left to manage themselves everything works out a lot better in the long run.

The management direction that ADF&G takes should be directed towards determining the level of "harvest" that can be made by humans without disrupting the ability of these natural systems to balance themselves. That is the only sustainable method of wildlife management that truly works. Please spend our states dollars on wildlife management projects that will enhance the future of these valuable resources rather than the opposite.

We can't control nature, we can only spend a lot of money trying to, and what happens when that money runs out?



We can however control ourselves instead, that costs much less and insures a much more secure future!

To spend a million dollars on wolf control measures in a place that doesn't require them is a disrespectful waste of our states resources. These funds could be instead used to help support research efforts in other arena's where real impacts are in effect or are threatening to become so such as the area which will be impacted by the Pebble Mine project where the potential loss of our states salmon resources will impact not just commercial and subsistence fishers but sport hunters as well. No fish = fewer bears.

In a place where bear hunting and bear viewing generates substantial income for its residents the potential impacts on these valuable resources far outweigh the need for wolf control in SE Alaska.

Sincerely,

John Hyde  
PO Box 34517  
Juneau, Alaska 99803



Oppose 178a and 179a

Throughout history and once again, embedded deep into our psyches, wolves are an expression of evil and eventually our 'scapegoats' to our own personal frustrations and aggressiveness. The wolf personifies evil in peoples' minds, and the BOG clearly demonstrates this with its continued persistence of predatory culling, even admitting to having no scientific evidence to back up their harvesting methods.

These researches of the BOG on prey harvesting and their consequences are in their own words 'unknown'. They admit to having no scientific proof that harvesting wolves and black bears will change the predator prey dynamics but yet they do admit the impact of clearcutting old growth forests as the primary concern: 'of strong concern equal to loss of winter habitat (for deer and other ungulates) is the reduction in forage biomass that occurs in 25-40 after clearcut logging.'

They even admit in the IM program of Nov. 2010 on wolf removal to having harvested no wolves and therefore, extended the hunting season until the end of May. 'This action, however, contributed little as the limit 1A harvest no wolves were harvested during that time in 2011'. Eventually, only four wolves were harvested ! There are no wolves to be removed !

What are they waiting for ??

In conclusion, I strongly oppose these unscientific and expensive wolf killing experiments on rare Archipelego wolves.

Very sincerely,

Agnès Castelloux



SUPPORT 172, 173 174

PLEASE!!

Stop the cruel practice of bear snaring, as well as year-round wolf killing.

Carol Biggs  
PO BOX 20271  
Juneau AK 99802



OPPOSE 178A & 179A

I request that State of Alaska funds be spent on something useful instead of this unscientific, expensive wolf killing "experiment" on the Alexander Archipelago wolves!

Some of these funds could be better used to learn about natural systems thinking and how nature actually works!

Carol Biggs  
PO Box 20271  
Juneau AK 99802



OPPOSE 178A & 179A

PLEASE DONT DO THIS.....STOP KILLING THE WOLVES.....I SO WANT TO  
COME TO YOUR STATE...BUT WILL NOT COME THERE OR BY ANYTHING  
THAT COMES FROM THERE IF YOU KEEP KILLING WOLVES

Karen Thomas



SUPPORT Proposals 172, 173, 174.

Please vote for these. I want to protect bears from being trapped and wolves from being eliminated. Our ecosystem needs these animals.

Gayle Andriani  
25 East Pennsylvania Ave  
Walkersville, MD 21793



OPPOSE 178A & 179A

Dear Esteemed Members of the Alaska Board of Game:

I am writing to ask you to please, please not go ahead with the plan to kill almost all the Alexander Archipelago wolves. These wolves have a much lower population numbers than the Sitka deer.

Did you not see the film based on the book by the Canadian wildlife researcher **Never Cry Wolf ?** Unexpectedly, he found that the wolves were eating the old and sick caribou and were actually strengthening the herd by culling the weak ones. Why would you want to decimate one of the beautiful animals that Alaska is known for?

If you proceed with this plan, I, and my family will scrap plans we have had to visit Alaska and leave our tourist dollars there. We also will tell everyone we know what you a doing up there to your animals. As a game board, please preserve rather than destroy.

Sincerely,

Diane W. Elliot

2609 Richelieu Avenue  
Roanoke, VA 24014



OPPOSE 178A, 179A

To Whomever It May Concern:

This note is in support of the wolves of Southeast Alaska's Alexander Archipelago. Wildlife managers, learn from the mistakes of other states and don't let political pressure guide your management decisions. Let good science guide your management decisions and don't recklessly kill wolves without understanding all of the factors involved in the decline of deer populations.

Sincerely,

Elijah Portugal

--

Elijah Portugal  
Graduate Research Assistant  
Department of Watershed Sciences  
Utah State University  
5210 Old Main Hill NR 210  
Logan, UT 84322



OPPOSE 178A and 179A

To The Board of Game:

The Alexander Archipelago wolves are extremely limited in number and should be protected, not killed. You have no evidence to prove that killing these rare animals will achieve the desired result you are after, which is increasing the Sitka Black-tailed Deer. The science is clearly lacking to support any predator control measures. I find the "Kill wolves" mentality to be a disturbing trend and a lazy approach to managing our wildlife.

The solution you are proposing is final and cannot be undone if you find that your supposition is not correct. Please keep in mind that extinction is forever.

Thank you for considering my comments.

Best Regards,

Sandra Lively



I **strongly support proposal 172** prohibiting the ban of hunting and trapping wolves during March 1st to November 1st. Hunting female pregnant wolves, whether on purpose or on accident, is a disgusting act on a vulnerable animal. This also applies to non-pregnant mother and pup wolves. If Alaska supports possibly taking out two generation of wolves in one hunting season, that is very sad for their state, ecology and biology.

This type of act also makes Alaska a very undesirable state for tourism, because people who are aware of this activity, such as my family and I, refuse to spend our money on a state that takes so little care of its wildlife. Please help the wolf population survive; it will only help your state in so many other ways.

Thanks,

--

Jenna Lente



Why do we have to keep killing animals inherent to a healthy ecosystem, even when their numbers are tiny compared to how we found them?

**No to Proposal numbers 178A and 179A.**

Thanks for considering my view,

A. Ballantine  
24 Enoch Crosby Road  
Brewster, NY 10509



SUPPORT 172 173, 174

I strongly support three proposals that the Board of Game will consider at its March 15-19, 2013 meeting in Kenai: Proposal 172 which would prohibit year-round wolf hunting; and Proposals 173 and 174, which would ban grizzly and black bear snaring in the Southcentral region.

**Proposal 172** would prohibit the hunting and trapping of wolves in all areas of Southcentral annually from March 1 until November 1. Currently hunting and trapping regulations in Southcentral are inconsistent, as in some areas, wolves may be killed before November 1, while pups remain dependent on their parents and the pack. In other areas, hunting and trapping is allowed after March 1, after mating has occurred and females may be pregnant.

Allowing hunting and trapping of wolves between March 1 and November 1 would likely result in two generations of a pack being wiped out at once. Dependent pups that do not survive are not counted, so that a substantially greater number of wolves is lost than the harvest statistics reflect. This is unscientific and represents very poor wolf population management. Because wolf pelts are usually not in prime marketable condition prior to November, a shorter, standardized season for wolves in Southcentral would have no financial impact on hunters and trappers.

**Proposals 173 and 174** would ban grizzly and black bear snaring in the Southcentral region. Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable. It is an extremely controversial method of killing animals. It is time to end the BOG's continual war on predators, which tarnishes Alaska's image for residents and non-residents alike. Until the BOG approved an experimental program in 2008, bear snaring has never been allowed in Alaska since statehood.

Females with dependent cubs and cubs themselves are at risk because bear snaring is so indiscriminate. Modern scientific management principles discourage the harvest of females because bears have one of the lowest reproductive rates. In addition, enforcement would be a nightmare for already over-extended Alaska State Troopers.

Another factor to be considered is the danger to other consumptive users, hikers and their pets who come upon a bear that is caught while its siblings or mother remain free in the area, resulting in the possibility of severe injuries or fatalities. Baited traps also create food-conditioned bears who associate food with humans, an obvious danger to our communities.

Bears have cultural, economic, and biological importance to Alaskans. Bear snaring should be banned as archaic and cruel. Living bears are highly valuable as a tourism draw and source of revenue, as they are cited as one of the "big three" species visitors come to see. These interests should be considered by the BOG as equally important as those of a special interest group. Again, I strongly urge the Board Members to vote "Yes" on **Proposals 172, 173, and 174.**

Thank you for your consideration.

Lynn Driessen



## OPPOSE 178A and 179A

I am writing to you in opposition of a decision that would allow the killing of the Alexander Archipelago wolves. I ask that the board improvise a different plan based on science.

I would ask the board to do a study on black bear predation on the local deer (adult and fawn) population. Living in an area with black bears and deer, from experience, I can tell you that black bears do prey heavily on fawns and older deer. I can also confirm that with extreme fluctuations (above avg. or below avg.) in the seasons can greatly affect and increase predation by black bears on fawns, deer, livestock, and domestic pets.

In addition, I would also ask the board to perform an accurate and in-depth study to determine the true amount of wolves and deer in the targeted area. How can one determine truthfully, if wolves are actually declining the deer population without knowing what the deer population is? Hunters have dry years in harvest, especially with fluctuations in the average conditions of the season.

In addition, how does the board know that killing the planned amount of wolves would not endanger their very existence if there are no current wolf counts for these areas? Where is the science in this Board's decision? From the Board's own studies, it was determined that predation by wolves is not the most significant reason for the decline of Sitka Black-tail Deer population. Perhaps controlling and manipulating these other factors may allow the population of the deer to reach the desired number? Perhaps limiting hunting licenses for a period of time from what they are now should be looked into?

In the year 2013, most people do not rely on deer to survive. In addition to, a person is not guaranteed a deer with every tag. I believe that limiting tags for a period of time makes this a viable alternative to aggressively managing wolves and/or any other predator.

Thanks,

Sarah Fenton



## Oppose 178A and 179A

Dear Board of Game Members,

My wife and I ask that you reject **ALL** of the proposed predator control programs for the **Alexander Archipelago wolves**. We believe, at the very least, that more study is needed before such aggressive population control programs can be justified.

Thank you for your consideration.

Joe & Carol McVeigh  
3 Kimberli Court  
Santa Fe New Mexico 87508



OPPOSE 178A and 179A

I ask that you do all that is possible to save the wolves. They are beautiful and have a purpose in this world. To slaughter them is cruel, especially from the air. Please help to keep these creatures alive, they need our support, not our gunfire.

Thank You.  
Askwali.

Dora Duvall



SUPPORT 172, 173 and 174

Dear Board Of Game:

I am opposed to bear snaring and year-round wolf hunting.

Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.

Snaring is a danger to hikers and their pets who may come upon a situation where one bear is caught while its siblings or mother remain free in the area, creating the very real possibility of severe injuries or fatalities. The baited traps also create food-conditioned bears, and animals which learn to associate food with humans are a danger to our communities.

Bear snaring is archaic, cruel and should be banned.

Living bears have a very high value as a tourism draw and a source of revenue.

This supports our tourism industry.

Please vote YES on Proposals 173 and 174 to stop bear snaring.

It is unethical and inhumane to allow the killing of wolves while the pups remain dependent upon the pack.

This has the potential to wipe out two generations at once. Additionally, the loss of the pups is not counted in harvest statistics,

making accurate population estimates - and future management decisions - problematical.

Allowing the take of wolves during pup season is not a sound scientific, biological, ecological, or ethical method of managing this species.

Establishing a shorter, standardized season for wolves in Southcentral would have no financial impact on hunters and trappers, because wolf pelts are usually not in prime marketable condition prior to November.

Please vote YES on Proposal 172 to stop year round wolf hunting.

**I urge you to vote "Yes" to Stop Bear Snaring (Proposals 173 and 174) and "Yes" to Stop Year-round Wolf Hunting(Proposal 172)!**

**I appreciate the opportunity to give my input and hope that the entire Board of Game listens to the will of the Alaska people when making decisions that affect us all.**

Thank you,

Janie Taylor  
2300 Jefferson Ave  
Anchorage AK 99517



OPPOSE 178A and 179A

This is to say 'NO' to the killing of wolves in the Alexander Archipelago. WHERE IS THE SCIENCE here???

As always, this is nothing but a plan to increase game numbers for the human hunters. If the deer population is declining, then why is it declining? Deer and wolves don't need 'man' to keep each other in check. This is just another case of follow the \$\$ and you'll know why the BOG wants to implement predator control. The only predator that needs controlling here is the human predator!

Martha J. Wavrin



OPPOSE 178A, 179A  
SUPPORT 172, 173, 174

To: Alaska Board of Game

I receive many emails from various sources regarding the continuing persecution of wolves and bears in many states in America. I fail to understand why these wonderful creatures are relentlessly demonised to the point of being trapped, snared, poisoned, gunned down from the air by people in light planes and by other foul means.

Wolves are part of the ecosystem and live in family groups. They do not impinge on humans so I fail to understand why they are so despised. Wolves control their own population so they don't need to be 'controlled' or 'managed'. Some people who are employed by the so-called 'wildlife agencies' are known to trap wolves and coyotes and set their own dogs on them. The poor tethered creatures are unable to escape their torment and they literally fight to the death. Is this what is regarded as 'control' and 'management' which is carried out by sadistic inadequates who then pose alongside the mangled and broken bodies of these poor wretched animals? I have seen photo evidence of this. These sick and perverted psychos are employees of fish and game boards and other inappropriately named 'wildlife' agencies. Ranchers are blaming wolves for the depletion of their stock but as they fail to adopt good husbandry to protect their animals, the inevitable will happen resulting in more persecution and killings of wolves. The ranchers can then claim compensation for their failure to look after their animals.

Wolves are also killed by hunters as they desire a 'trophy' to adorn the walls of their home. Knowing that wolves predate on elk and bison, the hunters kill those as well thereby depriving them of their source of food. Also, the Red Riding Hood syndrome is alive and well and this ridiculous myth abounds in states in America where wolves are present.

Proposal 173, 174: The snaring of bears is also extremely cruel and unnecessary. The human population has increased considerably resulting in people moving further afield into bear 'territory'. These awesome animals should be given the respect they deserve and allowed to live in peace without fear of being trapped, snared or shot. The word 'cull' is a euphemism for killing. It is common for bears to be hunted from bait sites. Food is left regularly for hungry bears, so they become accustomed to going to the same spot to find food. Hunters then hide in tree stands and shoot at the bears who come looking for their regular meal. It's hardly a display of skill or sportsmanship.

Although they have acknowledged that it is time for a change, the Ministry of Defence in England has attempted to defend its use of bearskin by claiming that the bears are "culled" anyway. However, it is money from buyers like the British Army that keeps hunters happy and making a profit from killing these animals. Bears aren't crops to be "harvested"; they are individuals who live in families and feel pain and terror when shot.

A representative from the Brigade of Guards trying to somehow justify the slaughter of free-living bears in North America showed the nature of "research" that went into this project by providing information published in association with a fur-trade group in Canada.



Bears are still slaughtered in order to make the Queen of England's guards' caps. It takes as much as the entire hide of one bear to make just one guard's headpiece. The black bears are hunted in Canada, and their skins are shipped to the UK. Many of the bears are shot several times before they die, and some escape the hunters and bleed to death. When mother bears are killed, orphaned cubs are left behind to starve.

The MoD said that "considerable efforts have been made" in the past to explore alternative sources of material, but that none was found to be "suitable". Yet when it was presented with high-tech synthetic materials from leading faux-fur manufacturers around the world and made to the MoD's own specifications - the MoD was quick to make negative comments about the faux fur, saying that it "lacks life" and "doesn't bounce back".

In the past five years alone, the MoD has contributed more than £321,000 to the slaughter of black bears for ceremonial caps and continues to move extremely slowly in looking for a replacement. These caps aren't even bullet-proof.

America should be proud of its rich heritage in its wildlife of wolves and bears. Instead it continues to extend the boundaries by allowing the demonization, persecution and killing of these majestic animals by the most barbaric and disgusting ways carried out by ignorant and sadistic thugs. The US government eager for votes, pander to the hunters.

Please stop the indiscriminate killings of these creatures, isn't there enough violence in this world without recreational violence carried out on innocent sentient beings? Thank you for reading this.

Sharon Hopkins



I strongly oppose (178A, 179A) the unscientific, expensive wolf killing "experiment" on the rare Alexander Archipelago wolves.

\* Predation by wolves is not the most significant reason for the decline in the Sitka Black-tailed Deer population, as the ADF&G's own studies admit. There are many other factors contributing to the decline, particularly:

- Loss of habitat because of clear-cut logging, especially of old-growth forests. This causes a decline in the wolf population as well as in the deer population.

- Severe winter weather, especially three recent deep-snow winters. In fact, the Unit 1A Feasibility Study states "severe winter weather is believed to have the greatest impact on Unit 1A deer populations, often resulting in high rates of mortality."

- ADF&G does not know the impact of black bear predation on deer fawns, but it cites data from a neighboring area indicating that black bears kill a significant number of fawns. The Feasibility Studies state that black bears have not (yet) been targeted for predator control in Southeast Alaska because of their economic value; nevertheless, if the BOG gets a foothold with predator control on wolves in the area, bears would likely be the next target. Given this and many other unknown variables, predator control is not justified for either wolves or black bears.

ADF&G also clearly states that these two "experimental" programs could be used as models for more Alexander Archipelago wolf control programs in Southeast Alaska.

\* The Unit 1A study stated that "we have no research information to accurately estimate wolf...numbers on Gravina Island." The Unit 3 study stated that wolf population counts are not even feasible there. ADF&G is equally unsure how many black bears are in either Unit, and it does not even know how many deer there are. The science is clearly lacking to support any predator control measures.

\* ADF&G's preliminary estimates indicated the basic cost for just the predator control program and related deer population studies will be more than \$200,000 per year for five years. In these times of austere budgets, there is certainly a better use for more than a million dollars of state money than to provide easier targets for a small number of deer hunters. Especially because, given the many other factors involved, it seems very unlikely the predator control program will actually result in more deer.

\* The studies did not address effects of fewer wolves on the wildlife tourism industry, which benefits local economies when visitors come to catch a glimpse of the rare wolf. Neither did they address the loss of wolf viewing opportunities for non-consumptive users, such as hikers and photographers.

Clay Baumung



ATTN: Board of Game Comments

**OPPOSE 178A and 179A**

I strongly oppose the two proposed predator control programs targeting Southeast Alaska's rare Alexander Archipelago wolves for the sole purpose of increasing the population of Sitka black-tailed deer. These "experimental" predator control programs are expensive, ill-advised, and unscientific.

My opposition to these proposals is based on sound science. Wolf predation is not the most significant reason for the decline in the Sitka black-tailed deer population, as shown by the ADF&G's own studies. Many other factors are contributing to the decline, particularly: 1) loss of habitat because of clear-cut logging, especially of old-growth forests, causing a decline in both the wolf and deer populations; 2) severe winter weather, especially three recent deep-snow winters. The Unit 1A Feasibility Study states "severe winter weather is believed to have the greatest impact on Unit 1A deer populations, often resulting in high rates of mortality."; and 3) ADF&G does not know the impact of black bear predation on deer fawns and has not yet targeted black bears for predator control in Southeast because of their economic value; unfortunately, bears would likely be the next target if the BOG gets a foothold with predator control on wolves in the area. As there are many unknown variables, predator control is not justified for either wolves or black bears.

There is a clear lack of science to support any predator control measures, as the Unit 1A study states that "we have no research information to accurately estimate wolf...numbers on Gravina Island." In addition, the Unit 3 study states that wolf population counts are not even feasible there. ADF&G is uncertain about the black bear population in both Units, nor does it know the deer population.

ADF&G estimates the basic cost for just the predator control program and related deer population studies would be more than \$200,000 annually for five years. In these difficult economic times, there is clearly a better use for over one million dollars of the taxpayers' money than providing easier targets for a small number of deer hunters. This is particularly true because, in view of the many other factors involved, it is highly unlikely the predator control program would actually result in more deer.

On an economic level, the studies have not addressed the impact of fewer wolves on the wildlife tourism industry, which obviously benefits local economies when visitors come to glimpse a rare wolf. It is time that the interests of non-consumptive users, such as hikers and photographers, are considered as a legitimate factor in BOG decisions. Unfortunately, the studies have not addressed the loss of wolf viewing opportunities for the growing numbers of non-consumptive users.

Once again, I strongly oppose the two proposed predator control programs targeting the Alexander Archipelago wolves. Such a "management experiment" is unscientific and expensive. I urge the Board Members to vote against both proposals at the March 15-19, 2013 meeting in Kenai. Thank you for your consideration.

Lynn Driessen



SUPPORT 172, 173, 174  
OPPOSE 178A, 179A

Studies have shown again and again that there are actually more people who want to come to a wilderness that is not a managed landscape park, but a real ecosystem.

I live in Europe where everyone has 6 weeks of vacation a year. And even school janitors can afford to take vacations abroad. Many enjoy going to Canada because unlike the US they are viewed as ecologically minded and not owned by the "veruckte" gun and hunting lobbies. This view is not helped again and again when predators lose the battle for sane management in the US.

It is accepted understanding in Europe that wolves and other predators do not damage deer and other populations. There are not campaigns to save prey for a reason. I would urge you to stop treating the dollars that come from tourists who admire wolves and bears so contemptuously. We are not all vegan, loons. Most of us would just like to admire a true wilderness with wolves alive and living.

Thank you,

Pamela Keeley-Gassmann



SUPPORT 172, 173, 174

Alaska Board of Game:

Please stop bear snaring (Prop. 173 & 174) and wolf-hunting (Prop. 172). It is time to bring Alaska into the 21st Century.

Sincerely,

Sue Hamber  
Escondido, CA



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Kodiak National Wildlife Refuge  
1390 Buskin River Road  
Kodiak, Alaska 99615  
(907) 487-2600



February 1, 2013

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

To Whom It May Concern:

Kodiak National Wildlife Refuge submits the following comments on regulation proposals pertaining to the Kodiak area (Unit 8) for consideration of the Board of Game.

#### Proposal 140

The Refuge opposes proposal 140. The proposal would not substantially influence recovery of the Sitka black-tailed deer population and unnecessarily reduce hunter harvest opportunity. While this proposal could facilitate modest herd recovery in areas that receive relatively high hunting pressure, the effect would be negligible over most of the unit area. In the area surrounding the city of Kodiak, current harvest regulations, which limit harvest to bucks during rifle season, provide sufficient protection to promote herd recovery. With few exceptions, winter weather is the primary factor regulating deer populations of the Kodiak Archipelago.

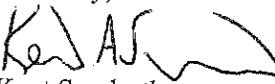
#### Proposal 141

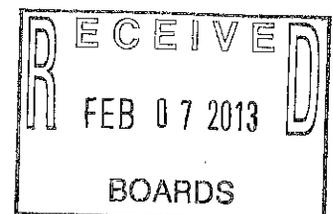
The Refuge supports proposal 141. As written, the proposal could increase hunting opportunity for introduced mountain goats on Kodiak Refuge lands where additional harvest would be beneficial. Increased harvest would prevent the population from exceeding habitat capacity and damaging alpine habitat. Without increased harvest, the population would likely exceed habitat capacity and decline substantially. Such a decline would curtail hunting opportunity. In cooperation with ADF&G, the Refuge has monitored the population and documented its exponential increase. Additional harvest is needed to check and maintain the population within ADF&G prescribed population management goals.

#### Proposal 142

The Refuge supports proposal 142. The proposal would promote ethical hunting practices of mountain goats in Game Management Unit 8. While the Refuge promotes increased harvest of mountain goats on Refuge lands, it is important this take occurs without significant wounding and loss of animals that are not recovered. Sport hunting is an important priority public use of Kodiak Refuge, and we support reasonable regulations that promote ethical hunting practices.

Sincerely,

  
Kent Sundseth  
Acting Refuge Manager



cc: Larry Van Daele  
Oliver Holm  
Tracey McDonnell



41640 Gladys Ct  
Homer, AK 99603

February 24, 2013

**ATTN: Board of Game Comments**  
**Alaska Department of Fish & Game**  
**Game Board Support Section**  
**PO Box 115526**  
**Juneau, AK 99811-5526**

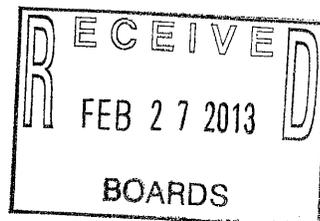
**Dear Board Members:**

**I support proposal 147 in Unit 15A and the suspension of the aerial wolf management. I hope you will be able to obtain data on habitat and moose productivity for the next several years to show the effects of the management changes.**

Sincerely,

A handwritten signature in black ink, appearing to read "Duane Howe".

**Duane Howe**





41640 Gladys Ct  
Homer, AK 99603

February 24, 2013

ATTN: Board of Game Comments  
Alaska Department of Fish & Game  
Game Board Support Section  
PO Box 115526  
Juneau, AK 99811-5526

Dear Board Members:

I am completely in support of Proposal 173 in the Southcentral Region. Snaring is an extremely cruel way for killing bears or any other animals. It has no place in any professional wildlife management program. I agree totally with the statements in the Proposal.

Sincerely,

A handwritten signature in cursive script, appearing to read "Duane Howe".

Duane Howe





41640 Gladys Ct  
Homer, AK 99603

February 24, 2013

ATTN: Board of Game Comments  
Alaska Department of Fish & Game  
Game Board Support Section  
PO Box 115526  
Juneau, AK 99811-5526

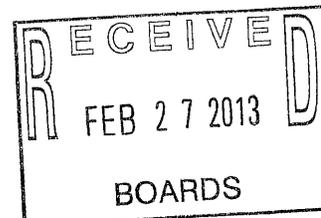
Dear Board Members:

I am completely in support of Proposal 174 in the Southcentral Region. Snaring is an extremely cruel way for killing bears or any other animals. It has no place in any professional wildlife management program. I agree totally with the statements in the Proposal.

Sincerely,

A handwritten signature in cursive script, appearing to read "Duane Howe".

Duane Howe





## FAX COVER SHEET

TO	
COMPANY	
FAX NUMBER	19074656094
FROM	Beth Davidow
DATE	2013-02-27 04:08:02 GMT
RE	ATTN: Board of Game Comments

### COVER MESSAGE

ATTN: Board of Game  
Comments  
2013

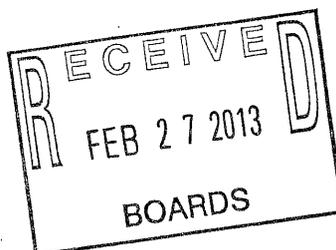
February 26,

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526



(907) 465-6094 <file:///localhost/tel/%2528907%2529%20465-6094>

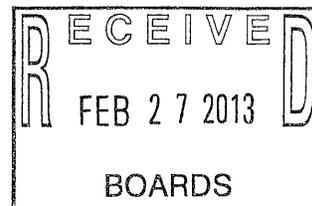
Dear Board Members:

As a former Alaskan resident who for a decade was privileged to share Alaska's wildlife with visitors from around the world, I am writing to you (from New Zealand) to voice my \*strong support\* for each of the following three proposals:



**\*Proposals 173 and 174 \*in which:**

**\* Scientists overwhelmingly agree that the snaring of bears is indiscriminate, cruel and not biologically sustainable.**



**\* Bear snaring is an extremely controversial method of killing animals. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its war on predators. Bear snaring has never been allowed in Alaska since statehood until the BOG approved an experimental program in 2008.**

**\* Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage the harvest of females.**

**\* Enforcement will be a nightmare for the Alaska State Troopers, who are already stretched thin.**

**\* There are the dangers to other consumptive users, hikers and their pets that may come upon a situation where one bear is caught while its siblings or mother remain free in the area, creating the very real possibility of severe injuries or fatalities. The baited traps also create food-conditioned bears, and animals, which learn to associate food with humans, are a danger to our communities.**

**\* Bears have cultural, economic and biological importance to Alaskans. Bear snaring is archaic, cruel and should be banned.**

**\* Living bears have a very high value as a tourism draw and a source of**



revenue. They are almost always cited as one of the "big three" species visitors come to Alaska to see. I can attest to this point as a tour guide in Denali, in Katmai, and the Inside Passage.

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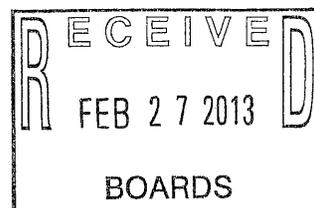
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**\*PROPOSAL 172\***

While I find all killing of wolves appalling and unnecessary, I believe it is unethical and inhumane to allow the killing of wolves while the pups remain dependent upon the pack. This practice has the potential to wipe out two generations at once. Additionally, the loss of the pups is not counted in harvest statistics, making accurate population estimates - and future management decisions -problematical.

Allowing the take of wolves during pup season is not a sound scientific, biological, ecological, or ethical method of managing this species.

◆ Currently, hunting and trapping regulations in Southcentral are inconsistent. In some areas wolves may be killed before November 1, while pups remain dependent on their parents and the pack. In other areas hunting and trapping is legal after March 1, after mating has occurred and females may be pregnant.



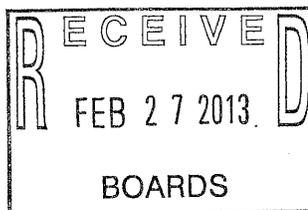
◆ Allowing the hunting and trapping of wolves between March 1 and November 1 means that two generations of a pack likely would be wiped out at once.

◆ Dependent pups that do not survive are not counted, meaning that a substantially greater number of wolves are lost than is reflected in harvest statistics. This is unscientific and a very poor way to manage the wolf population.

◆ Establishing a shorter, standardized season for wolves in Southcentral would have no financial impact on hunters and trappers, because wolf pelts are usually not in prime marketable condition prior to November.

Please take into consideration my comments and support proposals 172, 173 and 174.

Thank-you,



Beth Davidow

Far Northland, New Zealand

Former Alaskan resident & current frequent visitor

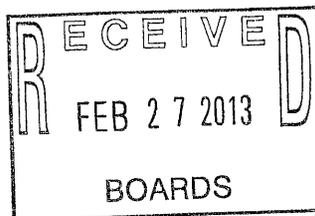


ATTN: Board of Game Comments

February 26, 2013

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

(907) 465-6094



Dear Board Members:

As a former Alaskan resident who for a decade was privileged to share Alaska's wildlife with visitors from around the world, I am writing to you (from New Zealand) to voice my **strong support** for each of the following three proposals:

**Proposals 173 and 174** in which:

- \* Scientists overwhelmingly agree that the snaring of bears is indiscriminate, cruel and not biologically sustainable.
- \* Bear snaring is an extremely controversial method of killing animals. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its war on predators. Bear snaring has never been allowed in Alaska since statehood until the BOG approved an experimental program in 2008.
- \* Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage the harvest of females.
- \* Enforcement will be a nightmare for the Alaska State Troopers, who are already stretched thin.
- \* There are the dangers to other consumptive users, hikers and their pets that may come upon a situation where one bear is caught while its siblings or mother remain free in the area, creating the very real possibility of severe injuries or fatalities. The baited traps also create food-conditioned bears, and animals, which learn to associate food with humans, are a danger to our communities.
- \* Bears have cultural, economic and biological importance to Alaskans. Bear snaring is archaic, cruel and should be banned.
- \* Living bears have a very high value as a tourism draw and a source of revenue. They are almost always cited as one of the "big three" species visitors come to Alaska to see. I can attest to this point as a tour guide in Denali, in Katmai, and the Inside Passage.



## PROPOSAL 172

While I find all killing of wolves appalling and unnecessary, I believe it is unethical and inhumane to allow the killing of wolves while the pups remain dependent upon the pack. This practice has the potential to wipe out two generations at once. Additionally, the loss of the pups is not counted in harvest statistics, making accurate population estimates - and future management decisions - problematical.

Allowing the take of wolves during pup season is not a sound scientific, biological, ecological, or ethical method of managing this species.

Currently, hunting and trapping regulations in Southcentral are inconsistent. In some areas wolves may be killed before November 1, while pups remain dependent on their parents and the pack. In other areas hunting and trapping is legal after March 1, after mating has occurred and females may be pregnant.

Allowing the hunting and trapping of wolves between March 1 and November 1 means that two generations of a pack likely would be wiped out at once.

Dependent pups that do not survive are not counted, meaning that a substantially greater number of wolves are lost than is reflected in harvest statistics. This is unscientific and a very poor way to manage the wolf population.

Establishing a shorter, standardized season for wolves in Southcentral would have no financial impact on hunters and trappers, because wolf pelts are usually not in prime marketable condition prior to November.

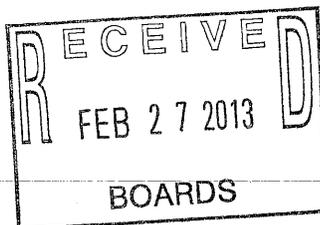
Please take into consideration my comments and support proposals 172, 173 and 174.

Thank-you,

*Beth Davidson*

Far Northland, New Zealand

Former Alaskan resident & current frequent visitor

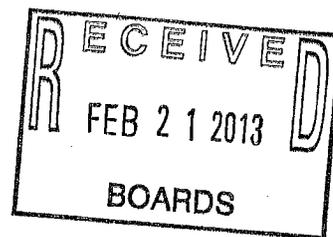




P.O. Box 2994  
Homer, AK 99603

February 21, 2013

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 1-907-465-6094



Dear Board Members:

**RE: Proposals 173 --Prohibit snaring of bears in the Southcentral region.**

I urge you to pass Proposals 173 that would prohibit snaring of black or brown bears in the Southcentral region of Alaska.

Snaring bears is a repugnant, inhuman practice, not legal in Alaska since statehood. It is dangerous, indiscriminate, inhumane, and unsafe. Since there are so few wildlife enforcement officers in Alaska, the BOG should not allow practices that will increase safety problems. Alaska is regressing in management methods of our valuable wildlife resources when such publicly unacceptable practices are implemented. It is bad enough that the state allows bears to be killed over bait. Let's not add bear snaring which will add to the poor image projected Outside of Alaska's wildlife management.

It is chilling to think of large snares being set near places where people recreate with their children and pets. Irresponsible people set traps along popular trails so it is likely snares will be bear set along trails as well if snaring bears is made legal. Others don't follow the laws and put bear bait stations too close to trails and don't legally mark them. A hidden bear snare near a well-used trail could be a fatal event to a pet or human unable to free themselves, particularly since snares don't have to be checked every day. Someone could also stumble on one of these snares with a bear or cub in it and have a fatal encounter with an enraged sow. Snaring bears is simple an outmoded, inhumane practice.

Liberalized bear hunting seasons and bag limits are a more sensible way to handle the hunting of these large, valuable animals when populations support a sustainable take. Let's not add to the black eye Alaska already has in the handling of its wildlife by allowing inhumane practices like bear snaring. Please pass Proposal 173 to prohibit bear snaring in Southcentral Alaska.

Sincerely,

*Nina Faust*

Nina Faust



P.O. Box 2994  
Homer, AK 99603

February 21, 2013

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 1-907-465-6094

Dear Board Members:

**RE: Proposals 174 --Prohibit snaring of bears in the Southcentral region.**

I urge you to pass Proposals 174 that would prohibit snaring of black or brown bears in the Southcentral region of Alaska.

Snaring bears is a repugnant, inhuman practice, not legal in Alaska since statehood. It is dangerous, indiscriminate, inhumane, and unsafe. Since there are so few wildlife enforcement officers in Alaska, the BOG should not allow practices that will increase safety problems. Alaska is regressing in management methods of our valuable wildlife resources when such publicly unacceptable practices are implemented. It is bad enough that the state allows bears to be killed over bait. Let's not add bear snaring which will add to the poor image projected Outside of Alaska's wildlife management.

It is chilling to think of large snares being set near places where people recreate with their children and pets. Allowing snaring within 1/4 mile of residences and trails is ridiculous! Irresponsible people set traps along popular trails so it is likely snares will be bear set along trails as well if snaring bears is made legal. Others don't follow the laws and put bear bait stations too close to trails and don't legally mark them. A hidden bear snare near a well-used trail could be a fatal event to a pet or human unable to free themselves, particularly since snares don't have to be checked every day. Someone could also stumble on one of these snares with a bear or cub in it and have a fatal encounter with an enraged sow. Snaring bears is simple an outmoded, inhumane practice.

Liberalized bear hunting seasons and bag limits are a more sensible way to handle the hunting of these large, valuable animals when populations support a sustainable take. Let's not add to the black eye Alaska already has in the handling of its wildlife by allowing inhumane practices like bear snaring. Please pass Proposal 174 to prohibit bear snaring in Southcentral Alaska.

Sincerely,

*Nina Faust*

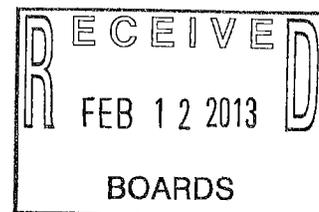
Nina Faust



P.O. Box 2994  
Homer, AK 99603

February 13, 2013

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 1-907-465-6094



Dear Board Members:

I am adamantly opposed to Proposal 155 that would allow the killing of brown bears at black bear bait stations in intensive management areas in Units 15A and 15C. I urge you to turn this proposal down.

Bear baiting is an archaic and barbaric practice that habituates bears to human scented garbage making them more likely to get into trouble around human habitation. It is bad enough that the state allows black bears to be killed over bait. The practice should not be extended to killing brown bears lured to bait stations.

The whole concept of luring bears, brown or black, to a bait station to be killed while eating is not fair chase. Already 31 other states have prohibited this unsporting method of killing bears. Let's not make the practice even more unpalatable by allowing brown bears to be killed over bait.

Please do not pass Proposal 155.

Sincerely,

*Nina Faust*

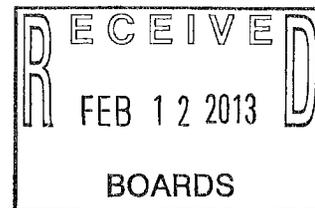
Nina Faust



P.O. Box 2994  
Homer, AK 99603

February 13, 2013

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 1-907-465-6094



Dear Board Members:

I am adamantly opposed to Proposal 156 that would allow the killing of brown bears at black bear bait stations in intensive management areas in Units 15A and 15C. I urge you to turn this proposal down.

Bear baiting is an archaic and barbaric practice that habituates bears to human scented garbage making them more likely to get into trouble around human habitation. It is bad enough that the state allows black bears to be killed over bait. The practice should not be extended to killing brown bears lured to bait stations.

The whole concept of luring bears, brown or black, to a bait station to be killed while eating is not fair chase. Already 31 other states have prohibited this unsporting method of killing bears. Let's not make the practice even more unpalatable by allowing brown bears to be killed over bait.

Please do not pass Proposal 156.

Sincerely,

*Nina Faust*

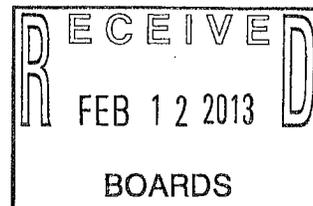
Nina Faust



P.O. Box 2994  
Homer, AK 99603

February 13, 2013

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 1-907-465-6094



Dear Board Members:

I am adamantly opposed to Proposal 154 that would allow the killing of brown bears at black bear bait stations in intensive management areas in Units 15A and 15C. I urge you to turn this proposal down.

Bear baiting is an archaic and barbaric practice that habituates bears to human scented garbage making them more likely to get into trouble around human habitation. It is bad enough that the state allows black bears to be killed over bait. The practice should not be extended to killing brown bears lured to bait stations.

The whole concept of luring bears, brown or black, to a bait station to be killed while eating is not fair chase. Already 31 other states have prohibited this unsporting method of killing bears. Let's not make the practice even more unpalatable by allowing brown bears to be killed over bait.

Please do not pass Proposal 154.

Sincerely,

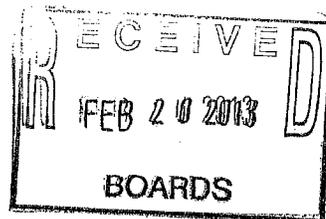
*Nina Faust*

Nina Faust



February 20, 2013

Darlene Hilderbrand  
P.O. Box 4311  
Homer, AK 99603



Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 1-907-465-6094

Dear Board Members:

I am firmly opposed to Proposal 156 that would allow the killing of brown bears at black bear bait stations in intensive management areas in Units 15A and 15C. I urge you to reject this proposal down.

Bear baiting is an archaic and barbaric practice that habituates bears to human scented garbage making them more likely to get into trouble around human habitation. It is bad enough that the state allows black bears to be killed over bait. The practice should not be extended to killing brown bears lured to bait stations.

The whole concept of luring bears, brown or black, to a bait station to be killed while eating is not fair chase. Already 31 other states have prohibited this unsporting method of killing bears. Let's not make the practice even more unpalatable by allowing brown bears to be killed over bait.

Please do not pass Proposal 156.

Sincerely,

  
Darlene Hilderbrand



4276 Shirley Ct  
Homer, AK 99603

February 25, 2013

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 1-907-465-6094

Dear Board Members:

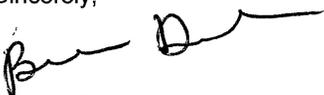
I am adamantly opposed to Proposal 156 that would allow the killing of brown bears at black bear bait stations in intensive management areas in Units 15A and 15C. I urge you to turn this proposal down. It is terrifying to be in the same Unit when using the area recreationally. I along with another mother took Girl Scouts canoeing. We had been working years training the girls for this outdoor experience. The girls have been taught to respect the environment and all living organisms they encounter. This put all of us at risk as the bear baiters were just in front of our troop on the trails. We were baiting the girls for bear attack. The health of an ecosystem is dependent on the healthy existence of large animals/ prey. Stop bear baiting.

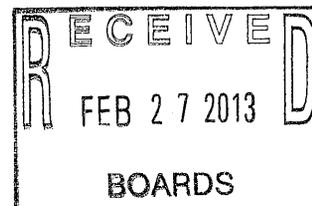
Bear baiting is an archaic and barbaric practice that habituates bears to human scented garbage making them more likely to get into trouble around human habitation. It is bad enough that the state allows black bears to be killed over bait. The practice should not be extended to killing brown bears lured to bait stations.

The whole concept of luring bears, brown or black, to a bait station to be killed while eating is not fair chase. Already 31 other states have prohibited this unsporting method of killing bears. Let's not make the practice even more unpalatable by allowing brown bears to be killed over bait.

Please do not pass Proposal 156.

Sincerely,

  
Brenda Dolma





Board of Game Comments  
Alaska Dept of Fish and Game

Re : Proposal 130 5 AAC 85.015 Hunting seasons and bag limits for black bear

Members of the Alaska Board of Game,

I am the author of Proposal 130, a proposal to restrict hunters who shoot sow black bear in Unit 6D from harvesting a black bear the next year in Unit 6D. My intent for this regulation is not so much the actual hunters that would be restricted the next season, but to change how hunters might approach the hunt. If hunters actively try to avoid sows there is tremendous potential to reduce sow and boar harvest, increase the population of sows, thus increasing cub production resulting in increased sustainable harvest.

To the best of my knowledge this regulation has not been tested and if measured only by the number of hunters who would be restricted from harvesting a bear the next season, has little value - about 5 per season. (per Dave Crowley)

There is no way to predict what percentage change would occur with selective harvest or how many hunters would even try. A 5-10% reduction in sow harvest offers the potential of reducing the number of bears harvested by 8-15 sows per year, but more important than that is the potential for those sows to produce cubs. With the average litter at just over 2 cubs and the survival rate of those cubs at 50%, this would suggest every sow is worth at least 5 surviving cubs and then some of those cubs will have cubs that will grow up to have cubs. It is beyond me to factor in sow harvest/survival, but it seems reasonable that every sow not harvested would equate to at least 2 more bears.

Combining the 5 sows saved by the regulation restriction with the potential selective hunting savings of 8-15 bears this puts the potential for this regulation to reduce harvest 13-20 sows and increase production by 25-40. I believe the regulation has the potential to reduce harvest more than than 13-20. There is only one way to find out.

How selective hunting might work-

1. More hunters go home without a bear because they passed up a bear they thought was a sow or couldn't decide was a boar
2. More bears get away because they ran off before the hunter could decide whether it was a boar



3. Less hunters will take whatever they see, especially at the end of the hunt.

\*Hunters shooting anything at the end of hunt just to bring home something is a mind set and I'm not sure this regulation would help. If this mindset could be changed through education, I believe it could be a huge difference in bear harvest.

4. Less sows taken because hunters were selective

A big issue is whether hunters can distinguish boars from sows. Historical harvest is about 70% boars. Some of this percentage is from the protection offered to sows with cubs, but I don't believe it is the sole reason, thus there is evidence that selective hunting for boars is successful to some degree. In a Wyoming study with mountain lions, selective hunters who attempted to harvest only males, harvested 32% females. Non-selective hunters harvested 49% females. Mountain lions sex is determined by size and the distance between a black spot under the tail and the tail.

There is a lot of information on the internet to suggest that there are differences in the appearance of boars and sows and with a little homework, increase a hunters chances of selecting a boar. Websites consistently state a sows ears are bigger in proportion to their head, that the skulls are slightly different shaped, that boars have more muscular necks etc. I personally find the width of the forearms a dead giveaway on mature boars. Bottom line is if a hunter decides to accept the challenge of gender identification, it can likely be accomplished a measurable percentage of the time.

We currently have restrictions on billy - nanny goat harvest that instead of restricting the hunter who shoots the nanny, restricts opportunity for other hunters. Proposal 130 targets the hunter who wasn't selective or wasn't successfully selective.

I have seen some different, sometimes controversial bear regulations recently to try and reduce bear populations in some areas. Why not try a regulation that can potentially increase the population in an area that could use more bears? If successful, it would be one more tool added to the tool box of management. If unsuccessful, it would be an extremely minor issue and could be rescinded.

Almost everyone I have spoken to about this likes the concept of possibly increasing production by attempting to protect the sows and limiting hunting restrictions.

Thank you for your time,

David Pinquoch  
PO Box 623  
Whittier, AK 99693

A handwritten signature in black ink, appearing to read 'D. Pinquoch'.

Page 2 of 2



**Universal Realty, Inc.**  
**Roxanne Miller**  
 2490 Paseo Verde Parkway, Suite 115  
 Henderson, NV 89074  
 Cellular: (702) 497-5246  
 Office Fax: (702) 614-4554

# Fax

To: BOARD OF GAME COMMENTS From: Roxanne Miller  
 Fax: 907 465-6094 Date: 2-27-13  
 Phone: Pages:  
 Re: OPPOSE 173-174-172 CC:

- Urgent     For Review     Please Comment     Please Reply     Please Recycle

**Comments:**

I OPPOSE BOTH BEAR SNORING  
 PROPOSALS 173 + 174-

I ALSO OPPOSE YEAR ROUND  
 WOLF HUNTING PROPOSAL 172

KEEP ALASKA BEAUTIFUL.  
 PRESERVE HER NATURE

Roxanne Miller



Safari Club International  
Kenai Peninsula Chapter  
President  
Mike Crawford  
P.O. Box 2988  
Soldotna, AK 99669  
907-252-2919

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

The following are comments regarding game proposals for the March 15-19, 2013, Board of Game meetings.

Proposal # 144: This proposal seeks to maintain the current moose hunting regulations (50" or 4 brow tines) in Units 7 & 15.

Safari Club International, Kenai Peninsula Chapter (SCI-KPC) supports this proposal.

This regulation was prompted by very low bull/cow ratios on the Kenai Peninsula. The 2011 season was accompanied by winter snows that were very detrimental to moose populations. This proposal was authored in the spring of 2012, after the harsh winter. Recent counts, which are far from comprehensive, show the bull/cow ratios have risen to the 20-25 bulls per 100 cow level. Anecdotal information from the public and from SCI members has shown an increase in bull sightings near the road system and for the first time in many years and for some ever, people are seeing bull moose. We have a habitat issue on the Kenai Peninsula that the Kenai National Wildlife Refuge (KNWR) has thus far shown no interest in changing. Their contention is that nature should run its course at the same time suppressing immediately the natural wildfires that have long been the staple for moose habitat in Alaska.

The public is clamoring for habitat manipulation to bring back the healthy moose populations the Kenai Peninsula was famous for and in fact, the KNWR was originally the Kenai National Moose Range. With the change in title, so has there been a change in management and the current management of the KNWR goes against the very premise of the Alaska mandate that insists renewable resources are manage to a maximum sustained yield.

With that, since there is no relief in sight for significant increases in the moose population coupled with the lack of moose in remote areas, the current regulation should remain in place. There is no reason to liberate the season now when we can be patient and in another two years, there should be a viable



population of fully grown bull moose to harvest. If the bull to cow ratio increases then there will be more bulls to harvest and the population can be stabilized while we wait for a significant habitat event and additional predator management. It is disheartening to the residents of the Kenai who have a tradition of utilizing moose for the family larder and there is no viable reason we should not have full grown moose available for harvest.

SCI-KPC takes a "no action" stance on the remaining moose proposals.

Proposal # 153: This proposal seeks to modify the current registration hunt for Kenai Peninsula bear and is limited to Unit 15A and 15C.

SCI-KPC supports this proposal if modified to say, "Modify the registration season dates and the bag limit for brown bears in Unit 7 & 15 as follows:

"Open a registration brown bear hunt beginning September 1<sup>st</sup> and ending May 31<sup>st</sup>. The bag limit shall be one brown bear every regulatory year."

ADF&G has taken an amend and adopt stance, which would retain the one bear every four years and would close the registration hunt in the KNWR and the majority of federally owned lands in Unit 7 in favor of a limited drawing hunt for those areas. The area ADF&G would be promoting consisted primarily of public lands near the populated areas of the Kenai.

There are several issues in regard to the ADF&G amendment. Changing to a drawing permit on federal land would minimize the harvest in areas that the study confirmed had prolific brown bear populations and were in areas that traditionally harbored viable moose populations.

SCI-KPC recognizes some of the benefits to the ADF&G amendment but are not comfortable with minimizing the take on federal lands to appease the KNWR. The most significant brown bear populations on the Kenai seem to occur on federal lands and a drawing hunt, as it has been in the past, would result in an insignificant harvest of brown bears where they are the most prolific.

SCI-KPC hunters recognize that the taking of brown bear on the Kenai has historically been by opportunity. The terrain does not lend itself to spot and stalk hunting and the areas where bears are prolific and could be taken in this way are off limits due to restrictions on the KNWR and the Kenai River Special Management Area (KRSMA). This is why the drawing permit system has been a dismal failure on the Kenai. Reflecting back to the days when there was a regular open harvest season in the spring and the fall in Units 7 & 15 it was recognized that bears were taken primarily by hunters with a tag when the opportunity presented itself. There were few bears taken back then but there was also enough taken to minimize the impact to populated areas while maintaining a viable population of brown bears on the Kenai.

There are several proposals that would allow some taking of brown bears over traditional black bear bait stations. SCI-KPC does not support those proposals at the moment. The opening of a significant



registration hunt needs to be given a chance to succeed before moving forward to taking brown bears over bait. It seems reasonable to believe that couple of years of a long term open registration hunt will bring the population back in line and alleviate some of the human/bear conflicts. At that point the season, bag limit, et.al., can be reviewed.

Proposal #157 – Seeks to modify black bear salvage requirements in Units 7 & 15 to say “either the hide and skull, or the meat must be salvaged and removed from the field.”

SCI-KPC supports this proposal.

The limit for black bears on the Kenai Peninsula is three bears. No one wants to have to deal with three bear hides and in fact, the hunters that are going to take multiple bears probably already have bear rugs/hides and have earthly use for more. Black bears are a meat animal. Few on the peninsula are so ripe with fish as to be inedible. Resident hunters are primarily taking black bears for the meat. Now that there are harvest reports required for black bear it seems reasonable to collect needed data from those reports. If in fact the data received from the skulls of black bears harvested is critical to management, which it evidently is not as there are times when either/or are already in place, then perhaps a modification to say the meat and skull must be salvaged would be appropriate.

Proposal # 160 – Seeks a “no closed season” for wolves in Units 7 & 15

SCI-KPC supports this proposal.

Given the strategies in place to begin aerial wolf hunting it seems at cross purpose to close the wolf hunting season at all. While there will likely be few taken during what is now the closed season, there would be some by sheer opportunity. A wolf to most hunters is a trophy no matter what time of year it is taken and given the sporadic quality of wolf hides on the peninsula, a summer wolf is likely to have just as nice a pelt as a winter wolf. The number of wolf killed moose on the peninsula is unknown but what is known is they are taking a huge toll on adult moose and caribou and any additional take of wolves is in the best interest of the peninsula ungulate population.

Proposal # 161- Seeks to extend the ptarmigan season in Units 7 & 15 to the end of April and reduce the bag limit from 10 to 5 from March 1<sup>st</sup> to April 30<sup>th</sup>.

SCI-KPC supports this proposal with some issues.

ADF&G takes a do not adopt stance on this proposal and they cite the reasoning as hunters may affect breeding season for ptarmigan and that there are only five birds per day taken by most hunters which suggests number of ptarmigan may be on the decrease.



With that there are issues that need to be addressed by the Board of Game. There is virtually no data available for upland birds in south central Alaska. And yet the limit for ptarmigan and grouse has remained at ten per day for as long as anyone can remember. The season opens August 10<sup>th</sup> and this is said to allow sheep, caribou and goat hunters to take ptarmigan for camp meat. From August 10<sup>th</sup> until September 1<sup>st</sup> the young birds are half grown, have minimal flight capabilities and are of course not so bright when confronted by someone willing to do them harm. Given the reluctance by ADF&G to reduce a bag limit briefly and extend a season briefly, one must question the validity of the current season and bag limits. There seems little point in worrying about the breeding season if immature birds are subject to the slaughter that they currently are.

The original intent of this proposal was to allow upland hunters who hunt with dogs on foot to have some time to hunt after December. Given the distances one must climb to hunt ptarmigan on the Kenai and the snow conditions from December to mid-March, it is very difficult for the foot hunter. By mid-March and sometimes early March the snow has settled and provides a surface the dogs can negotiate without exhaustion in short order. The additional issue faced by foot hunters in the winter is daylight. There is not enough daylight to allow for a climb and a return and have any real time to hunt.

The suggestion that bird hunters on the Kenai typically do not take more than five birds is an interesting one. The author of this proposal has been hunting the Kenai Mountains for ptarmigan for many years. He has also been sending samples of wings and heads of ptarmigan to the biologist in Palmer for bird research. At no time has anyone ever asked how many birds he takes on a typical day of hunting. Those who live here and who frequent the Kenai Mountains on snowmachine also know that ptarmigan are located in the high country and are shot with mostly .22 pistols. A flock will fly a short distance and the hunter will ride to that area and shoot some more until the flock is shot out or the limit is taken. It seems either these folks have not been contacted or have chosen to "fudge" the numbers taken.

Upland hunters with dogs typically do not take more than five birds per day no matter how good the hunting may be. There are not that many areas where the foot hunter has the time to conduct a hunt in a day and these individuals want to maintain healthy populations of birds in these areas so hunting is always available.

Another issue to consider in ptarmigan management, if there is to be such a thing, is the dynamics of the species involved. The Kenai Peninsula has the unique quality of supporting populations of Rock, Willow and Whitetail ptarmigan. Rock ptarmigan are very reclusive and inhabit areas in the winter months that are virtually inaccessible by hunters. Most are taken incidentally to other hunting. Willow ptarmigan are the predominant species taken by casual hunters and snowmachine hunters. They move down in elevation in the winter and are located in alder patches and willow scrub below tree line. And they are cyclic. Much like grouse, Willow ptarmigan cycle up and cycle down; in up years they seem to be everywhere, in down years, good luck finding them. This past fall they were, along with Spruce grouse, in a down cycle. This virtually always coincides with an up cycle of hares. As hare populations grow, so do populations of birds of prey and predators such as coyotes, lynx and mink. All will take Spruce grouse



or ptarmigan eggs or chicks and the down cycle is always obvious to those out in the country who pay attention.

Whitetail ptarmigan are seemingly immune to the cycle their cousins are subject to. These resilient and smallest of the ptarmigan species avoid the cycle and it seems this is by virtue of where they live. They are the highest dwelling ptarmigan and even in winter do not inhabit areas below tree line. Their summers are spent in high elevations amongst the rock outcrops and seemingly barren ground where one would expect to find sheep. Their camouflage is as good as any species in the wild.

Whitetails are rarely hunted specifically on the Kenai. Access to where they live is strictly a foot pursuit and a full day is typically required to get into their environment and have a few hours of hunting before the hunter and the dogs are spent.

Given what is known about ptarmigan on the Kenai, this proposal would seem to have absolutely no effect on ptarmigan populations if it were adopted. If in fact there is a real concern that it would then it appears it is time for a real study of upland birds on the peninsula and perhaps an adjustment in seasons and bag limits. SCI-KPC would never consider adopting a proposal that would harm a species. The ADF&G take on this proposal brings up many more questions than it answers and it seems here is a significant need for a "big picture" review of upland bird harvest on the Kenai.



3 pages

**TO:** Alaska Department of Fish and Game, Boards Support Section

**FROM:** Kaleen Vaden, Wildlife photographer, visitor to Alaska at least 15 times

26583 Lawrence Adams Drive  
Mechanicsville, MD 20659  
301-884-8308  
kpv58@hotmail.com

**SUPPORT: Proposals 173 and 174**, to ban grizzly and black bear snaring in Southcentral region

**SUPPORT: Proposal 172**, to prohibit the hunting and trapping of wolves in all areas of southcentral annually from March 1 until November 1.

I have spent a lot of time (and money!!) in many parts of Alaska photographing wildlife, and hope you realize that the wildlife is the best resource you have. Wildlife viewing is one of the main reasons people come to Alaska and is a huge source of income to the state.

I totally oppose bear snaring as cruel and unnecessary, for the following reasons. It is unthinkable torture. I also support the prohibition of wolf hunting and trapping from March until November for the following reasons.



Proposals 173 and 174 (page 253), submitted by AWA and AWA Board member Valerie Connor, respectively, would ban grizzly and black bear snaring in the Southcentral region. (2)

\* Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.

\* Bear snaring is an extremely controversial method of killing animals. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its war on predators. Bear snaring has never been allowed in Alaska since statehood until the BOG approved an experimental program in 2008.

\* Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage the harvest of females.

\* Enforcement will be a nightmare for the Alaska State Troopers, who are already stretched thin.

\* There are the dangers to other consumptive users, hikers and their pets who may come upon a situation where one bear is caught while its siblings or mother remain free in the area, creating the very real possibility of severe injuries or fatalities. The baited traps also create food-conditioned bears, and animals which learn to associate food with humans are a danger to our communities.

\* Bears have cultural, economic and biological importance to Alaskans. Bear snaring is archaic, cruel and should be banned.

\* Living bears have a very high value as a tourism draw and a source of revenue. They are almost always cited as one of the "big three" species visitors come to Alaska to see.



③

**PROPOSAL 172 (page 252) would prohibit the hunting and trapping of wolves in all areas of Southcentral annually from March 1 until November 1. In some areas current regulations allow wolves to be hunted and trapped after March 1, when females may be pregnant. In other areas hunting and trapping is allowed before November 1, when wolf pups are dependent on adults in their pack for survival.**

**It is unethical and inhumane to allow the killing of wolves while the pups remain dependent upon the pack. This has the potential to wipe out two generations at once. Additionally, the loss of the pups is not counted in harvest statistics, making accurate population estimates - and future management decisions - problematical.**

**Allowing the take of wolves during pup season is not a sound scientific, biological, ecological, or ethical method of managing this species.**

◆ **Currently, hunting and trapping regulations in Southcentral are inconsistent. In some areas wolves may be killed before November 1, while pups remain dependent on their parents and the pack. In other areas hunting and trapping is legal after March 1, after mating has occurred and females may be pregnant.**

◆ **Allowing the hunting and trapping of wolves between March 1 and November 1 means that two generations of a pack likely would be wiped out at once.**

◆ **Dependent pups that do not survive are not counted, meaning that a substantially greater number of wolves is lost than is reflected in harvest statistics. This is unscientific and a very poor way to manage the wolf population.**

◆ **Establishing a shorter, standardized season for wolves in Southcentral would have no financial impact on hunters and trappers, because wolf pelts are usually not in prime marketable condition prior to November.**



Whittier Marine Charters

Painted Ocean Inc.  
Whittier Boat Rental

Port of Call Gallery

AK Dept of Fish and Game  
Boards Support Section  
PO Box 11526  
Juneau, AK 99811-5526

This letter is in support of a "modification of black bear bag limit in Prince William Sound", proposal 130.

I'm writing this letter as a big game transporter as well as an avid hunter and wildlife viewer. As a business owner in Whittier, and as someone who spends over a hundred days per year on Prince William Sound, I feel that I'm fairly qualified to speak on the issue. There are a number of reasons why I support this proposal, but I believe that one stands out.

I believe that this proposal will decrease harvest, and specifically the harvest of young and female bears, by providing an incentive for hunters not to take "the last chance opportunity".

Unfortunately, at this time, it is all too common for hunters to justify shooting any animal because the end of their trip is near. This basic story is typical among almost everyone I've witnessed with a small bear.

While you cannot necessarily manage hunter ethics, you can provide mechanisms in management that may control hunter actions. I think this proposal may provide that and in turn will help to preserve the quality of black bear hunting in Prince William Sound.

Thank you for your time and consideration.

Mathew Kopec

*Mail: PO Box 2693, Soldotna, AK 99669  
Summer: Harbor Loop Drive, Whittier*

*907.440.9510*



**Recipient Information**

**To: Board of Game Comments**  
**Company: Board of Game Comments**  
**Fax #: 9074656094**

**Sender Information**

**From: Alan Lennard**  
**Company: concerned**  
**Email address: alan.aloha.com.pine.4.15.11@gmail.com (from 66.75.79.69)**  
**Sent on: Thursday, February 28 2013 at 1:14 AM EST**

This fax was sent using the FaxZero.com free fax service. FaxZero.com has a zero tolerance policy for abuse and junk faxes. If this fax is spam or abusive, please e-mail support@faxzero.com or send a fax to 800-980-6858. Specify fax #8795377. We will add your fax number to the block list.



Alan Lennard  
[alan@aloha.com](mailto:alan@aloha.com)  
POB 818, Haleiwa, HI 96712

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  
Regarding: Proposals 172, 173 and 174

Dear Sirs,

My name is Alan Lennard. I live in Hawaii.

**I SUPPORT Proposal 172; I SUPPORT Proposal 173; I SUPPORT Proposal 174.**

I am asking you to Vote "Yes" to Stop Bear Snaring (Proposals 173 and 174) and "Yes" to Stop Year-round Wolf Hunting (Proposal 172)!

It is essential to limit hunting practices regarding these apex predators. organisms are endangered and their habitat is essential.

Proposals 173 and 174 (page 253), ban grizzly and black bear snaring in the Southcentral region.

- \* Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.
- \* Bear snaring is an extremely controversial method of killing animals. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its war on predators. Bear snaring has never been allowed in Alaska since statehood until the BOG approved an experimental program in 2008.
- \* Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage the harvest of females.
- \* Enforcement will be a nightmare for the Alaska State Troopers, who are already stretched thin.
- \* There are the dangers to other consumptive users, hikers and their pets who may come upon a situation where one bear is caught while its siblings or mother remain free in the area, creating the very real possibility of severe injuries or fatalities. The baited traps also create food-conditioned bears, and animals which learn to associate food with humans are a danger to our communities.
- \* Bears have cultural, economic and biological importance to Alaskans. Bear snaring is archaic, cruel and should be banned.
- \* Living bears have a very high value as a tourism draw and a source of revenue. They are almost always cited as one of the "big three" species visitors come to Alaska to see.

PROPOSAL 172 (page 252) would prohibit the hunting and trapping of wolves in all areas of Southcentral annually from March 1 until November 1. In some areas current regulations allow wolves to be hunted and trapped after March 1, when females may be pregnant. In other areas hunting and trapping is allowed before November 1, when wolf pups are dependent on adults in their pack for survival.

It is unethical and inhumane to allow the killing of wolves while the pups remain dependent upon the pack. This has the potential to wipe out two generations at once. Additionally, the loss of the pups is not counted in harvest statistics, making accurate population estimates - and future management decisions - problematical.

Allowing the take of wolves during pup season is not a sound scientific, biological, ecological, or ethical method of managing this species.

- \* Currently, hunting and trapping regulations in Southcentral are inconsistent. In some areas wolves may be killed before November 1, while pups remain dependent on their parents and the pack. In other areas hunting and trapping is legal after March 1, after mating has occurred and females may be pregnant.
- \* Allowing the hunting and trapping of wolves between March 1 and November 1 means that two generations of a pack likely would be wiped out at once.
- \* Dependent pups that do not survive are not counted, meaning that a substantially greater number of wolves is lost than is reflected in harvest statistics. This is unscientific and a very poor way to manage the wolf population.
- \* Establishing a shorter, standardized season for wolves in Southcentral would have no financial impact on hunters and trappers, because wolf pelts are usually not in prime marketable condition prior to November.

Sincerely,

*alan*

Alan Lennard



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

February 27, 2013

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: BOG Meeting March 15-19, 2013, Southcentral

Dear Board Members:

Friends of Chugach State Park is a grassroots organization that values and works as an advocate for Chugach State Park. Our sole purpose is to advance and protect the park. We have been active for more than twenty years. Our members live in or near the park.

**Proposal 133. Oppose. Moose hunting in Anchorage Management Area.** This proposal would re-authorize moose hunting in the Anchorage Management Area, in particular in the Campbell Creek, Rabbit Creek and McHugh Creek drainages. Up to 50 permits might be issued, although fewer permits have been issued in the past. The season would commence the day after Labor Day and continue to November 30.

Friends of Chugach State Park opposes any moose hunting in the Campbell Creek, Rabbit Creek and McHugh Creek drainages. These areas are heavily used by hikers and skiers throughout the year, and usage is rapidly increasing every year. Indeed, the parking lot at Glen Alps has just been expanded by another 50 parking places because it is often filled early in the day.



Board of Game  
February 27, 2013  
Page 2 of 5

Wildlife viewing during the moose rut is highly popular, with much of the best viewing within a mile of the Glen Alps parking lot. Scores of photographers, families, and ordinary citizens walk through this area every day. Hunting moose in this part of Chugach State Park, whether for large bulls or antlerless moose is incompatible with the primary uses of this area.

The greater public good is served by refraining from taking any of these moose. There is a significant amount of moose hunting in Anchorage already, in particular at JBER, in the Birchwood Management Area, and in upper Ship Creek. We question the assumption that killing moose in the Campbell Creek, Rabbit Creek, and McHugh Creek drainages will help to diminish the frequency of moose/vehicle collisions in Anchorage. We express doubt that there is any data that supports this assumption.

If there is to be any hunting in the Campbell, Rabbit, and McHugh drainages, then hunting should start after October 15. These areas too are heavily used in September and the first part of October.

**Proposal 136. Support. Greater discretion to biologists to address poor health of Dall sheep in Chugach State Park.** It has been reported that Dall Sheep in Chugach State Park are showing poor health, including low body fat, and a declining population. One possible cause of the decline in the health of this population is the disruption to populations of Dall Sheep caused by the full curl only regulation, while another possible cause is the issuance of too many permits. The taking of only the largest males with full curl horns probably puts an evolutionary disadvantage on the animals that carry the particular DNA that gives them size, longevity, and full curl horns.

The taking of these large breeders by hunters may also cause stress to ewes and smaller sheep due to disruptions to "family" dynamics caused by the removal of these dominant males before the end of their natural life spans.

The goal of this proposal is to free biologists from mandates imposed from above. The management goal for CSP Dall Sheep should be the health of the



Board of Game  
February 27, 2013  
Page 3 of 5

population of Dall Sheep. If a modification of the full curl only rule, or a reduction in the number of permits, will help the population, then the Department's biologists should be given the authority to do that. The increased revenue to the Department resulting from issuing many more permits than there are available target animals should not be the deciding factor.

**Proposal 137. Oppose. Increase Dall Sheep hunting in Anchorage Management Area, South Eagle Fork drainage, and Ram Valley.** This proposal is one of three made by Aaron Bloomquist which would increase the number of permits for taking sheep in areas close to Anchorage; specifically, in the drainages of Falls Creek, Rainbow Valley, McHugh Creek, Rabbit Creek, Campbell Creek, the South Fork of Eagle River and Ram Valley. We oppose all of them.

This first proposal, i.e. #137, would increase as much as six fold the number of tags issued. We strongly oppose such a radical change. We, the Friends of Chugach State Park, prefer to see all of these areas closed to the hunting of Dall Sheep. The sheep, in particular full curl rams, that are found in these areas are a delight for wildlife viewing. Mr. Bloomquist asserts that there will be no loss to anyone if more full curl rams are taken from these areas, but the truth is that hundreds, or perhaps thousands of people will lose the opportunity to view one of these animals if it is taken by a hunter. These valleys and the mountains that tower above them are not in remote Alaska, but instead the backyard of Anchorage, a city of nearly 300,000 people.

We are particularly concerned that Proposals 136, 137, and 138 assign no importance to an explicit statutory purpose of Chugach State Park, which is to establish areas for the "display of local wildlife." The same factors claimed by the proponents of these sheep-hunting proposals (*i. e.*, close proximity to an urban population center, fairly close access by road, etc.) are the same factors that must disqualify these proposals from consideration or approval. These areas are close, convenient, accessible, and traditional areas where sheep have been viewed and appreciated by the public for forty years and more, ever since Chugach Park was created. Further, these viewing opportunities do not end on Labor Day.



Board of Game  
February 27, 2013  
Page 4 of 5

To the contrary, "increased hunter opportunity" is emphatically not one of the legislative purposes for which Chugach State Park was created.

We note that while increased hunter opportunity is a goal of some people, the mere presence of hunters stalking and perhaps killing game impinges on the park experiences of traditional park visitors (hikers, berry pickers, families, etc.)

Even if the proposed sheep hunts themselves were to take place out of the immediate view of traditional park visitors, hunting these particular sheep populations will drastically increase their wariness of humans, and will inevitably make them less available for viewing by the public at the traditional locations where they have been viewed and enjoyed for decades. To knowingly allow this to happen will be to directly thwart one of the statutory purposes of the Park.

We also note that the Dall Sheep of Chugach State Park have been reported to be unhealthy with low body fat, and other problems. In these circumstances it makes better sense to leave them with a refuge.

Finally, if more tags are to be issued, the season should not open until mid October because all of these areas are heavily used by hikers, berry pickers, and ordinary citizens during August, September, and the first half of October.

**Proposal 138. Oppose. Create a new drawing hunt for Dall Sheep near Anchorage.** This proposal would authorize up to six tags for Dall Sheep in the drainages of Falls Creek, Rainbow Valley, McHugh Creek, Rabbit Creek, Campbell Creek, the South Fork of Eagle River.

We, the Friends of Chugach State Park have "adopted" the Falls Creek Trail, and do trail maintenance as volunteers so that hikers such as ourselves can gain access to the high alpine valleys and mountains above. Access would otherwise be quite difficult due to thick brush, in particular alders.

As noted in our comments opposing proposal 137, there should be no sheep hunting in any of these areas in Anchorage's backyard. The best and highest use



Board of Game  
February 27, 2013  
Page 5 of 5

for sheep in these areas is viewing. The taking of one of the full curl rams in one of these close-in areas means that hundreds (or perhaps thousands) of people will not see the same ram.

**Proposal 139. Oppose. Open Ram Valley for the DS123 Sheep Drawing.** This proposal would open Ram Valley to sheep hunting. We oppose it for the same reasons as given in opposition to proposals 137 and 138.

We also note that there is no legal access to Ram Valley. Hunters will need to gain the permission of landowners to gain access, but if given a permit may presume that they have ADF&G's authority to trespass.

Very truly yours,

---

Mark Miner  
President  
Friends of Chugach State Park

The logo for FaxZero, featuring a stylized illustration of a fax machine on the left and the text "faxZERO" in a large, bold, sans-serif font. Below the text is a horizontal line, and underneath that line is the slogan "Send a fax for free" in a smaller, sans-serif font.

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**Recipient Information**

**To: ATTN: Board of Game Comments**  
**Company: Alaska Department of Fish and Game**  
**Fax #: 9074656094**

**Sender Information**

**From: Phil Nicols**  
**Company: GroupMax**  
**Email address: Phil@GroupMax.ca (from 99.242.254.194)**  
**Sent on: Wednesday, February 27 2013 at 8:50 PM EST**

This fax was sent using the FaxZero.com free fax service. FaxZero.com has a zero tolerance policy for abuse and junk faxes. If this fax is spam or abusive, please e-mail support@faxzero.com or send a fax to 800-980-6858. Specify fax #8794272. We will add your fax number to the block list.



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

February 27, 2013

**Please be advised that we strongly oppose this unscientific, expensive wolf killing "experiment" on the rare Alexander Archipelago wolves.**

Why is this man's answer to everything? If it's deemed a "Nuisance" KILL IT! New "buzz words" like "Culling" or "Management" or "Products" only skew the truth.

Wolves were here long before man. It is us that are encroaching on their territory not the other way around. Their species was fine before man came along. Now apparently someone put man in charge of their well-being - or not.

We need to focus on things like growing crops for people – not for factory-farmed animals.

We need to invest our time and money into what they term "Alternative Energy". In fact solar, wind, geothermal, hydrodynamic should be the "normal" and things like fossil fuels and nuclear energy should be used as an absolute last resort backup.

We need to look at the future. What are we leaving for our kids? A society that kills and takes everything in its path or one that values sustainability?

You people are in position to help. Please use your power wisely for the sake of future generations.

Sincerely,

A handwritten signature in black ink, appearing to read "Phil Nicols", with a long, sweeping underline that extends to the right.

Phil Nicols



**Kachemak Bay Conservation Society**

3734 Ben Walters Ln, Homer, AK 99603  
907 235.8214  
kbayconservation@gmail.com

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

February 28, 2013

RE: SUPPORT Proposal 147

Dear Board Members,

The Kachemak Bay Conservation Society (KBCS) would like to urge the passage of the following honorable proposals:

**Proposal 147**-Would suspend aerial taking of wolves in Unit 15A and modify the population and harvest objectives for moose. KBCS supports Proposal 147 for the following reason:

- 79 percent of the 1,314 square miles of land is the Kenai National Wildlife Refuge where aerial wolf hunting is prohibited.
- KBCS supports no wolf kill in this area because it is much smaller than area where aerial hunting has been allowed, which can cause difficulties.
- The main reason biologists have given for low moose population is declining habitat and moose browse, creating an unsustainable environment resulting in starvation.
- KNWR attracts thousands of tourists. This proposal would be compatible with wildlife viewing and would not cause negative publicity. The wolves are worth more alive than dead.

KBCS applauds the recommendation of Proposal 147 and requests the board please pass this proposal.

Sincerely,

Roberta Highland, President  
Kachemak Bay Conservation Society  
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Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

February 28, 2013

RE: OPPOSE Proposal 154

Dear Board Members:

The Kachemak Bay Conservation Society (KBCS) is adamantly opposed to Proposal 154 that would permit the killing of brown bears at black bear bait stations in Units 15A and 15C. This would also permit the baiting of brown bears. KBCS requests that you reject this barbaric proposal.

Bear baiting is an outdated and brutal practice that accustoms bears to human scented garbage, this makes bears more likely to get into trouble near human habitation. Bear feeding has been prohibited to assist in eradicating this situation. KBCS believes that baiting of any bear, black or brown, only perpetuates this problem.

At present, 31 other states have banned this detestable method of killing bears. As Alaskans, we should support this ban and not permit this revolting practice by voting against Proposal 154. KBCS feels that all bear bait stations are an atrocity and should be disbanded at once.

Please do not pass Proposal 154!

Sincerely,

Roberta Highland, President

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

February 28, 2013

RE: OPPOSE Proposal 155

Dear Board Members:

The Kachemak Bay Conservation Society (KBCS) is adamantly opposed to Proposal 155 that would permit the killing of brown bears at black bear bait stations in Units 15A and 15C. KBCS requests that you reject this barbaric proposal.

Bear baiting is an outdated and brutal practice that accustoms bears to human scented garbage, this makes bears more likely to get into trouble near human habitation. Bear feeding has been prohibited to assist in eradicating this situation. KBCS believes that baiting of any bear, black or brown, only perpetuates this problem. Although brown bears are not the target of the black bear bait sites, they will none the less be attracted to these sites. Proposal 155 allows for their "incidental" harvesting.

At present, 31 other states have banned this detestable method of killing bears. As Alaskans, we should support this ban and not permit this revolting practice by voting against Proposal 155. KBCS feels that all bear bait stations are an atrocity and should be disbanded at once.

Please do not pass Proposal 155!

Sincerely,

Roberta Highland, President

Kachemak Bay Conservation Society

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February 24, 2013

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

**RE: OPPOSE Proposal 156**

Dear Board Members:

The Kachemak Bay Conservation Society (KBCS) is adamantly opposed to Proposal 156 that would permit the killing of brown bears at black bear bait stations in Units 15A and 15C. KBCS requests that you reject this barbaric proposal.

Bear baiting is an outdated and brutal practice that accustoms bears to human scented garbage, this makes bears more likely to get into trouble near human habitation. Bear feeding has been prohibited to assist in eradicating this situation. KBCS believes that baiting of any bear, black or brown, only perpetuates this problem.

At present, 31 other states have banned this detestable method of killing bears. As Alaskans, we should support this ban and not permit this revolting practice by voting against Proposal 156. KBCS feels that all bear bait stations are an atrocity and should be disbanded at once.

Please do not pass Proposal 156!

Sincerely,

Roberta Highland, President

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

February 25, 2013

RE: OPPOSE Proposal 160

Dear Board Members:

The Kachemak Bay Conservation Society (KBCS) adamantly opposes Proposal 160 for the following reasons:

**Unit 15A:**

- 79 percent of the 1,314 square miles of land is the Kenai National Wildlife Refuge where aerial wolf hunting is prohibited.
- The proposed area for wolf killing is smaller than any area where aerial hunting has been allowed which can cause difficulties.
- The main reason biologists have given for low moose population is declining habitat and moose browse, creating an unsustainable environment resulting in starvation. Killing wolves would only add to this problem.
- KNWR attracts thousands of tourists. This plan is incompatible with wildlife viewing and would cause negative publicity and be a deterrent to tourism. The wolves are worth more alive than dead.

**Unit 15C:**

- Near Homer and Anchor Point, the general moose population has been healthy, with a 30 percent increase from 1992 to 2010. The moose population is in the middle of the objective number of moose, indicating there is no emergency need for such heavy-handed methodology.
- BOG implemented a change to Unit 15C removing spike, fork, and 3 brow tine from harvestable moose population and there has not been time to see the effects of these changes; so an aerial wolf kill program is premature.
- Biology does not support this intense management program as moose population concerns in 15C are not driven by wolf predation but the result of an insufficient harvest strategy which has been exacerbated by illegal harvest and moose-motor vehicle collision.
- Unit 15c has an abundance of other food source including fish, organic beef, and great gardening climate. Unit 15c is on the road system, which increases the hunting pressure on moose.

**Units 15A & 15C**

- The ADF&G brochure notes that predator control isn't done until biologists have studied the causes of declining game populations and the impact of predators and tried other methods, such as improving habitat, reducing hunting and easing predator trapping and hunting regulations.
- ADF&G did receive funding to conduct moose studies in Unit 15A and Unit 15C and are currently underway and wolf research will follow. Thus no aerial wolf kill should be considered until the research has been completed.



**Kachemak Bay Conservation Society**

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- In a unanimous vote, the Homer Fish and Game Advisory Committee recommended that the Board of Game not approve this intensive management.
- The human population has increased so that there will never be enough moose for everyone who wants to kill one and realistically there never will be.

**KBCS urges you to please consider these facts and vote against Proposal 160!**

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

February 25, 2013

RE: SUPORT Proposal 172

Dear Board Members,

The Kachemak Bay Conservation Society (KBCS) is supporting Proposal 172, with the caveat that we oppose all trapping or hunting of wolves. The following Proposal 172 is however, less invasive for the following reasons:

- It is cruel and unethical to allow wolves to be killed while their pups are still dependent upon the pack. This has the potential to eradicate two generations at the same time.
- Inaccurate estimates of wolf populations. The death of wolf pups are not calculated in the harvest statistics. This would also render future management decisions incorrect.
- Presently, the hunting and trapping regulations in Southcentral are inconsistent.

Sincerely,

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

February 25, 2013

RE: SUPPORT Proposal 173

Dear Board Members,

The Kachemak Bay Conservation Society (KBCS) would like to urge passage of Proposal 173 for the following reasons:

- The snaring of bears is considered inhumane, unethical, cold-hearted, and cruel by the majority of the public. To allow this despicable practice so a few may profit from it is reprehensible.
- The classifying of black bears as furbearers would subject them to indiscriminate trapping regardless of gender or dependence of offspring.
- The public would be at risk. Snares are indiscriminate, taking cubs as well as sows. The danger of a snared bear cub, that would undoubtedly have its mother nearby is a scenario that does not leave much to the imagination.
- Hunters and non-hunters would be effected by diminishing bear populations brought about by the indiscriminate killing of bears.
- It is impracticable to believe that too few State Troopers would be able to effectively regulate and enforce the proper rules of these traps in such a large area.
- Consider the \$538 million dollar tourist industry verses the entire revenues brought in by hunting and trapping and you will realize that the comparisons are not even close.

KBCS applauds the recommendation of Proposal 173 and requests the board please pass this proposal.

Sincerely,

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Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 1-907-465-6094

February 28, 2013

RE: Proposal 174

Dear Board Members,

The Kachemak Bay Conservation Society (KBCS) would like to urge the passage of Proposal 174 for the following reasons:

- The Department of Fish and Game does not have the information to insure that bears will not be overharvested by the use of snaring limits, open seasons, and newly approved methods of take.
- There is no way for the public to know where bear snaring is taking place. The Department of Fish and Game currently does not provide a map or locations of where bear snaring bait stations are located. Since the public would be unaware of these locations, any person at any time could be significantly put at risk.
- Bears are not always killed instantly. This leads to unimaginable suffering as the animal attempts to free itself.
- Bear snares are indiscriminate, which permits the capture of brown bears, sows with cubs and cubs. This method of culling is socially unacceptable, appalling, and disgraceful method of wildlife management.
- Bears have a very low rate of reproduction. As the bear population dwindles, so will the tourists who spend millions of dollars each year to view Alaska's bears in our national and state parks.

KBCS applauds the recommendation of Proposal 174 and requests the board please pass this proposal.

Sincerely,

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February 25, 2013

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

**RE: SUPPORT Proposals 147,173, & 174**

Dear Board Members,

The Kachemak Bay Conservation Society (KBCS) would like to urge the passage of the following honorable proposals:

**Proposal 147**-Would suspend aerial taking of wolves in Unit 15A and modify the population and harvest objectives for moose.

**Proposals 173 and 174**-Would prohibit snaring of bears in the South-central Region.

KBCS applauds the recommendation of Proposals 147, 173, & 174 and requests the board please pass these proposals.

Sincerely,

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March 1, 2013

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

Re: Request to Withdraw Proposal 171.

Dear Chairman Spraker:

The APHA respectfully requests that Proposal 171 be withdrawn from consideration by the Board of Game.

We submitted this proposal because of our concern for the increasing loss of nonresident allocation to “next of kin” hunters. Case in point, last year in the TOK out of 8 nonresident tags, 6 went to next of kin hunters. APHA is concerned this will continue to be an increasing problem; however we do not feel that our proposal is the best way to address this topic.

Thank you for considering our request to withdraw our proposal and thank you for the considerable time and effort you put into addressing the issues that face wildlife conservation in Alaska. We highly value the opportunity that all users have to participate in the Board of Game process.

Sincerely,

Sam Rohrer  
APHA President



February 28, 2013

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

### **WINTER 2013 REGION II 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 Region II meeting in Soldotna. The Alaska Professional Hunters Association Inc. (APHA) has serious concerns with the scope of several 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 as well as fair allocation.

APHA is often working at the forefront of challenges related to wildlife conservation and hunting opportunities for all hunters, not just guides or APHA members. By doing this, we are often the "first line of defense" and advocacy for Alaska and all hunters.

Many of the proposals you will be considering at this meeting seek to eliminate or restrict existing non-resident hunter opportunity in some manner. 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. By eliminating non-resident hunters or by giving special season dates for resident-only hunters we further fragment the hunter/conservationist fraternities. The perceived conflicts will not disappear from the field, rather they will continue to be replaced and possibly escalated within different user groups. Let's turn together as hunter conservationists before we turn away from each other. Every time we turn away from each other as hunters we give success to those who work to eliminate our way of life. If we can encourage the turning together and work together as the hunter conservationists we are, Alaska can and will continue to be one of the greatest places for all people to enjoy wildlife. As subsistence hunters, general resident hunters or non-resident hunters we have a common bond; "wildlife conservation measures that provide for abundance, for sustained yield and maximum benefit provides for the best interest of the whole" and we encourage this board to continue to do the great job they have been doing to help provide that balance.



As you consider the Region II proposals, APHA asks that you keep the following points in mind:

1. APHA has no support for any of the reduce, eliminate or restrict nonresident opportunity proposals as written. None of these proposals have been submitted from a conservation based or best interest of the whole concern but rather from a self-serving aspect.
2. Many long established professional guide businesses will be negatively impacted and or put out of business if the proposals we oppose were to pass. To impact their businesses with preferential resident hunter privileges and thus provide a commercial transporter incentive to fill the void goes strongly against our constitutional mandate of maximum benefit.
3. Several of these proposals express concern over perceived crowding of guided hunting activity on public lands. Please understand that eliminating non-resident hunting activity will not eliminate transporter or other hunting parties. The perceived conflicts will continue or even be enhanced as the transporter industry has no conservation basis.
4. Alaska Statutes 08-54-720 clearly defines unlawful acts related to the guiding industry and of the 19 items listed therein, #2 states that it is “illegal for a person licensed as a guide to intentionally obstruct hinder or attempt to obstruct or hinder lawful hunting engaged by a person who is not a client of the person”.

Additionally, AS 16-05-790 defines similar protection of hunters through the Hunter Harassment Law. If there are bad things going on within this scope, let's first turn to existing law, and enforcement of it before we start eliminating an important industry, hunting opportunities, meat sharing and allot of peoples ways of life.

We would encourage you to look at the number of complaints received from the public and that exist related to these two laws and the related conflict between nonresident and resident hunters to help you understand better the actual extent of the perceived problems.

5. According to ADF&G reports, approximately six percent of the annual human harvest of caribou, ten percent of the human harvest of moose and forty percent of the human harvest of Dall's sheep are harvested by nonresident hunters during general State regulated hunting opportunities. If the Federal harvest and unreported harvest factors



are considered as well, the percentages of nonresident harvest drop several points even lower.

6. Nonresident license fees are added to by multiplying times three with the matching Pitman-Robertson funds which make up the majority of ADF&G Wildlife Conservation Division budget. Nonresident annual harvest percentage of moose, caribou and sheep is low in comparison with the wildlife conservation funding (approximately eighty percent) they provide. Eliminating nonresident opportunity as many of these proposals request will result in an immediate and large shortfall of important conservation funding for ADF&G which will eventually result in overall resident hunter opportunity loss as well.
7. Also important to this equation is that Alaska's annual human harvest of these wildlife resources represents something near six percent of the annual mortality of these species while predation accounts for approximately eighty-four percent.
8. Intensive management increases actual costs to achieve prudent wildlife conservation goals that provide for the best interest of our wildlife and all people who enjoy or depend on them. When you eliminate non-resident opportunity, you eliminate vital funding needed to enhance and conserve wildlife for the best interest of the whole.
9. When non-resident hunting opportunity is reduced or eliminated, a substantial part of the annual predator harvest which occurs during the ungulate hunts is also reduced or eliminated. When you eliminate this non-resident harvest, you eliminate in most cases, the most significant annual predator harvest as well. .
10. Few if any of these proposals are generated from concerns related to Federal lands where guide industry *concessions or special use permits* are incorporated which limit the number of guides per geographical region. Currently, the proposed DNR/ADF&G/BGCSB Guide Concession program development is in its final stages and implementation of the program will help dispel the perceived conflicts.
11. Over sixty percent of Alaska's lands are federal domain. Nonresident sportsmen and women pay for upwards of 80 percent of our wildlife conservation funding. Alaska represents by far the greatest divide between resident and non-resident licensing fees of any state. Nowhere else in the US do residents pay so little for so much in relation to hunting privileges. Alaska needs additional funding for wildlife conservation in a very serious way and the only tool we can find support for is increasing non-resident hunting license and tag fees. As our economy and especially our rural economy needs



as much bolstering as possible, these proposals are pushing the envelope in a manner that will result in much greater adverse consequences.

12. The Board of Game has a policy related to basing nonresident and resident hunter opportunity when implementing a drawing permit program due to conservation and or allocation concerns. This policy requires the Board to look at the previous ten year history of effort between nonresident and resident hunters and to make the drawing permits available on that defined basis. This is a fair mechanism and should be continued.
13. It has been proven within the guide industry throughout the Western US States that when a limit of ten percent of hunting opportunity is provided to nonresident hunters, and guides have to compete with other guides to secure the hunters as clients, that a viable guide industry cannot survive. The broad overhead cost of maintaining a viable business cannot be supported on the "luck of the draw" concept.
14. Alaska is different than the rest of the US where we often hear comparisons. It is important to note that the Alaska Guide Required law is vitally important to the resident hunter. One of the key points is its application to wildlife conservation by restricting non-resident opportunity. Compare all of the other states that do not have this law and see what challenges exist for quality big game hunting opportunities. They are nearly 100 percent allocated by very restrictive drawing permits and many residents who live in the heart of these areas compete for a lifetime without ever receiving a permit to hunt in these hunts.
15. Montana recently underwent a loss of nonresident hunter opportunity due to a ballot initiative that did away with private landowner tags because a small group of residents felt that these permits should not be going to nonresident hunters. The result was a catastrophic loss of funding to Montana Fish Wildlife and Parks for important wildlife conservation programs. Alaska cannot afford this.
16. The number of resident hunters who use airplanes to find and then harvest animals, or that have mechanical means to access what used to be hard to access remote regions are growing in number. They also contribute substantially to the perceived conflicts in the field. Professional guides are already restricted by law (with the exception of some spring bear seasons) from using an airplane to find an animal with the intent to harvest that animal. Resident hunters are not thus restricted. Again, if problems do exist, allow for existing law to be applied.



17. APHA has concerns about the nature of these proposals which lack any proof of issue and have no biological or conservation basis. We urge you to explore the actual documented problem to define if it is real.
18. There exists the serious question of “Can the Board of Game in such a serious manner legally separate one user group from another.” Certainly, related to wild sheep or mountain goat populations which are not covered under the Intensive Management Law, the question is raised about how a preference would be provided without addressing the Tier I or Tier II hunt aspect and qualify them as an Intensive Management Species and then develop C&T and ANS findings statewide? These proposals have broad sweeping changes and impacts on the future of hunting and wildlife conservation in Alaska, none of which we view as beneficial to the whole.

### **Specific Proposal Recommendations**

**PROPOSALS APHA SUPPORTS: 127 - 129, 131, 139 - 143, 148, 152, 153, 160, 175**

**PROPOSALS APHA OPPOSES: 130, 136 - 138, 144, 145, 151, 162 - 170, 172, 173, 174**

**APHA WISHES TO WITHDRAW PROPOSAL 171**

### **INDIVIDUAL PROPOSAL COMMENT**

**Proposal 127 through 129 - Support.** Based on the proposals given merits.

**Proposal 130 - Oppose.** Based on ADF&G comments.

**Proposal 131 through 135 Support.** We Support the re-authorization of these antlerless moose hunts so that ADF&G has all the tools they need to soundly manage this moose population in a very urban area.

**Proposal 136 - Oppose.** ADF&G already has the ability to reduce or increase the number of permits that are issued. We do not support the relaxing of the full curl requirement because we believe it is a vital management tool that automatically limits the harvest to the older age class rams that have already passed on their genetics and are at the upper end of their life expectancy.



**Proposal 137 - Oppose.** This hunt was established to be very limited to make it a premier trophy hunt and the Chugach State Park advisory committee approved it because of its low impact on the resource and we support their decision.

**Proposal 138 - Take no Action.** Based on action taken on proposal 139

**Proposal 139 - Support with Modification.** We support this proposal with the ADF&G amendment to include all of the west side of Indian Creek, all of the Falls Creek drainage and all of the Rainbow Creek drainage. There were very few legal rams in this unit last year and by adding these additional areas it will make it the premier sheep tag to draw again. The Chugach State Park advisory committee approved the expanding of this unit almost unanimously and we support their decision.

**Proposal 140 - Support.** We do not feel that this proposal will have a noticeable impact on the deer population. The biggest factor in regards to the population is severe winters.

**Proposal 141 - Support.** This proposal was developed with input from a diverse group of Kodiak stakeholders, including: Sport and Subsistence users, Guides, and Federal and State Managers. This proposal address overpopulation of goats, while putting in place measures to prevent the wasteful harvest of goats. It also provides opportunity for local hunters to access goats that have been pushed to lower elevations by winter weather.

**Proposal 142 - Support.** This proposal was developed by the same stakeholder group that developed Proposal 141. Currently Kodiak Island has this same regulation in place for Brown Bears and Elk. Most APHA Guides have a similar requirement written into their hunt contracts.

**Proposal 143 - Support with modification.** We support this proposal with the Departments modifications.

**Proposal 144 - Oppose.**

**Proposal 145 - Oppose.**

**Proposal 148 - Support.** Based on its given merits.

**Proposal 151 - Oppose.** APHA supports hunting opportunity where ever possible.

**Proposal 152 - Support.** Based on its given merits.

**Proposal 153 - Support with modification.** We support this proposal with the Departments modifications.



**Proposal 154 through 156 - No Comment.** APHA has no comment on these proposals due to lack of consenses.

**Proposal 160 - Support.** Based on its given merits.

**Proposal 162 through 170 - Oppose.** APHA does not support any of these severely restrict or eliminate non-resident hunting opportunity proposals. Please see points 1-18 at the start of this letter. These proposal should be rejected.

**Proposals 171 -** APHA has asked the Board of Game to withdraw this proposal.

**Proposal 172 - Oppose.** This proposal would substantially reduce opportunity to harvest wolves.

**Proposal 173 and 174 - Oppose. Oppose.** Most APHA members are not proponents of bear snaring, but we favor letting the department keep this method in their tool box to use if necessary to reverse severe decline in ungulate populations.

**Proposal 175 - Support.**

This concludes our proposal comments. Thank you for the opportunity to submit our comments.

Sincerely,

APHA Board of Directors

Sam Rohrer, President  
Tony Lee, Vice President  
Brad Dennison, Treasurer  
Joe Klutsch  
Mike Litzen  
Wayne Kubat  
Sam Fejes  
Joe Schuster



# National Parks Conservation Association<sup>®</sup>

*Protecting Our National Parks for Future Generations<sup>®</sup>*

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March 1, 2013

Mr. Ted Spraker  
Chairman / Alaska Board of Game  
Board Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

RE: NPCA Comments on Proposals before the BoG

Support Proposals: #173 and #174  
Oppose Proposals: #175

Dear Chairman Spraker and Board,

The National Parks Conservation Association (NPCA) appreciates the opportunity to provide input on several proposals for the upcoming South central Region Board of Game (Board) meeting in Kenai from March 15 - 19, 2013.

NPCA is America's only private nonprofit advocacy organization dedicated solely to protecting, preserving, and enhancing the U.S. National Park System for present and future generations. Founded in 1919, NPCA has more than 740,000 members and supporters, of which nearly 2,000 reside in Alaska.

Both NPCA and the National Park Service (NPS) have repeatedly emphasized the fact that the mission and mandates of the Park Service differ from the State of Alaska and other federal agencies in regards to conserving wildlife resources. This divergence in management priorities may require different management approaches for lands managed by NPS, approaches which are consistent with NPS enabling legislation and the Alaska National Interest Lands Conservation Act (ANILCA). Both clearly affirm congressional intent that NPS must strive to preserve natural ecosystems & natural processes in Alaska.<sup>1</sup>

The congressional record when adopting Title VIII of ANILCA reaffirmed congressional intent that NPS enabling legislation would have precedence to state management priorities:

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<sup>1</sup> NPS Comment Letter to the BoG dated December 29, 2011.  
NPCA Comment Letter to the BoG dated December 30, 2011

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—[t]he standard to be met in regulating the taking of fish and wildlife and trapping is that the preeminent natural values of the park system shall be protected in perpetuity and shall not be jeopardized by human uses. These are very special lands and this standard must be set very high: the objective for park system lands must always be to maintain the health of the ecosystem and the yield of fish and wildlife for hunting and trapping must be consistent with this requirement.” *Congressional Record*

While both NPCA and NPS recognize and support the State of Alaska’s unique role in wildlife management on NPS managed lands in Alaska, the state has agreed to *co-manage* wildlife resources in a cooperative fashion, primarily through this Board. The State of Alaska formally agreed in its Master Memorandum of Understanding (MMOU) with the NPS to the following:

“To recognize the Service's responsibility to conserve fish and wildlife and their habitat and *regulate the human use* on Service lands in Alaska, in accordance with the National Park Service Organic Act, ANILCA, and other applicable laws.”  
*Emphasis added*

“To recognize that National Park areas were established, in part, to "assure continuation of the *natural process of biological succession*" and "*to maintain the environmental integrity of the natural features found in them.*" *Emphasis added*”<sup>2</sup>

The State of Alaska formally acknowledges the divergent wildlife management mandates between the Park Service and the State of Alaska in the MMOU, yet previous Boards have consistently ignored NPS comments, concerns and formal requests for well over a decade.<sup>3</sup>

NPCA has documented well over 50 times that NPS has asked that its lands be exempt from BOG actions, only to have the Board ignore those requests. Actions taken in the 2013 compendium by the Park Service are a direct result of the state’s desire NOT to cooperate when proposed hunting regulations conflict with NPS enabling legislation and management policies.

NPCA acknowledges that the state may adopt regulations attempting to artificially manipulate natural wildlife population densities on state lands for the purpose of increasing human harvest opportunity of ungulates, but the Board has the responsibility to provide an exception for lands managed by the NPS when implementing regulations that are clearly inconsistent with NPS mandates, especially when the NPS formally petitions the Board to provide such an exemption.

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 addition to the formal MMOU which acknowledges NPS management authority, the constitutional doctrine of preemption clearly dictates that when federal law and state law conflict,

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<sup>2</sup> Master Memorandum of Understanding adopted by the State of Alaska and the NPS

<sup>3</sup> NPS Comment Letter to the BoG dated March 3, 2012.

federal law must be followed.<sup>4</sup> Preemption requires the state to refrain from implementing regulations that involve NPS managed lands if such regulations are:



“inconsistent with park purposes and values; diminish opportunities for current or future generations to enjoy, learn about, or be inspired by park resources or values; or those that unreasonably interfere with other appropriate uses”<sup>5</sup>

NPCA has a long history of interest and involvement in BOG regulatory actions, especially regulatory actions that have the potential to negatively impact wildlife on NPS managed lands – particularly predators such as wolves and bears. As such, NPCA offers the following comments.

## **NPCA Comments Southcentral BoG Meeting**

### **Proposal 173 – 174: Support** - Prohibit snaring of bears in the Southcentral Region

The snaring of bears is currently not allowed on NPS managed lands due to significant human safety concerns, non-target harvest and ethical considerations regarding the harvest of bears.

The NPS has stated:

“The NPS opposes allowing the trapping of black bears. A host of problems can arise from this allowance including increased unintentional trapping of moose and caribou.”<sup>6</sup>

“This proposal would allow the use of traps to take black bears in GMU 16. This activity is inconsistent with NPS management regulations and policies. NPS is also concerned about the human safety issues involved with the use of traps to take bears.”<sup>7</sup>

“This proposal would extend bear baiting seasons and locations, allow the use of snares to take black bears, and allow the taking of brown bears over bait ... NPS opposes implementation of this proposal on NPS lands and requests that consistent with 5 AAC92.115 (h) this proposal not be authorized on NPS lands.”<sup>8</sup>

NPCA supports the intent of these proposals as they pertain to lands managed by the NPS, and state lands bordering NPS managed lands, areas in which NPS wildlife resources that

<sup>4</sup> Julie Lurman and Sandy Rabinowitch, "[Preemption of State Wildlife Law in Alaska: Where, When, and Why](#)," 24 Alaska Law Review 145, 2007

<sup>5</sup> 2012 Lake Clark National Park and Preserve Compendium revoking State of Alaska wildlife harvest regulations.

<sup>6</sup> NPS comment letter to BoG dated March 9, 2006

<sup>7</sup> NPS comment letter to the BoG dated February 11, 2009

<sup>8</sup> NPS comment letter to the BoG dated February 11, 2009



primarily reside in parks and preserves are subject to bear snaring activities on state m lands.

**Proposal 175: Oppose** - Open a no closed hunting season for coyote with no bag limit for the Southcentral Region.

The NPS considers the harvest of wolves and coyotes during the summer months when adult dependent pups are associated with the pack as inconsistent with NPS management purposes and values. Due to the Boards unwillingness to acknowledge this determination by the NPS, specific parks have been required to revoke the taking of wolves and pups in summer pupping months by park compendium.<sup>9</sup>

The NPS has commented on this issue many times in the past stating:

“This proposal would establish a year-round coyote hunting season with no limit on the number of animals that may be taken. The justification offered is for predator control to increase populations of Dall sheep, an activity which the NPS cannot support. Should the Board approve the measure, we request that NPS lands be specifically excluded.”<sup>10</sup>

“This proposal would establish a year-round coyote hunting season and increase the harvest limit to 10 coyotes per day. The author's justification is for predator control to increase populations of Dall sheep. Should the Board support this proposal, we request that NPS lands be specifically excluded.”<sup>11</sup>

“This proposal would establish a year-round coyote hunting season with no limit on the number of animals that may be taken. We oppose extending the hunting season into months in which whelping occurs and when pelts are generally in less than prime condition. Should the Board support this proposal, we request that NPS lands be specifically excluded.”<sup>12</sup>

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Jim Stratton".

Jim Stratton  
Alaska Regional Director

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<sup>9</sup> 2012 Lake Clark National Park and Preserve Compendium revoking State of Alaska wildlife harvest regulations.

<sup>10</sup> NPS comment to the BoG dated February 16, 2007

<sup>11</sup> NPS comment to the BoG dated February 11, 2009

<sup>12</sup> NPS comment to the BoG dated February 11, 2009



## **LAW OFFICE OF KNEELAND TAYLOR, P.C.**

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February 28, 2013

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: BOG Meeting March 15-19, 2013, Southcentral

Dear Board Members:

I have lived in Alaska since 1974, and spend a great deal of my time hiking, climbing, kayaking, skiing and otherwise enjoying Alaska's wild places. As beautiful as they are, I find that our Alaskan National Parks are superior to other wild places in Alaska. "Superior" because the wildlife in our National Parks is not as wary of us humans, and therefore more viewable. I comment on proposals for this reason.

Science and observation teach us that animals such as wolves, wolverine, and other predators (including bears) are sentient. Not conscious as we are, but nevertheless experiencing pain, anxiety, playfulness, affection for their young, and other things signifying intelligence. Because they are sentient, practices such as snaring are unethical, and wrong.

Speaking out against practices that we believe are unethical (and on other matters of public policy) is one of the responsibilities of citizenship. It is a responsibility that should go hand in hand with the privileges that we American citizens enjoy in our system of government. I comment also because of my conviction that we need to live up to our responsibilities if our system of



Board of Game  
February 28, 2013  
Page 2 of 4

government is to succeed.

Having said that, please consider my comments regarding the following proposals:

**Proposal 133. Oppose. Moose hunting in Anchorage Management Area.** This proposal would re-authorize moose hunting in the Anchorage Management Area, in particular in the Campbell Creek, Rabbit Creek and McHugh Creek drainages.

There should be no moose hunting in the Campbell Creek, Rabbit Creek and McHugh Creek drainages. These areas are heavily used by hikers and skiers throughout the year. Moose congregate close to the Glen Alps parking lot during the rut, and I have joined dozens of people in watching. There has been a long campaign to open this area and others to limited hunting, to prove a point. But hunting in a prime viewing area will always be offensive to many of us.

Vast areas of Alaska are open to moose hunting. Can't the State of Alaska leave a few square miles to people who enjoy looking at animals?

**Proposal 136. Support. Greater discretion to biologists to address poor health of Dall sheep in Chugach State Park.** I made this proposal. My purpose was to give biologists discretion. I have attended BOG meetings many times, and I recall the BOG reversing itself on the number of permits to be authorized after lobbyists cornered BOG members during a break. At the heart of that issue was biologists fears that the full curl rule was causing unhealthy population dynamics. I would like to see the biologists freed from political pressure to maximize "hunter opportunity" by issuing lots of permits for exceedingly rare animals; especially when there is good reason to belief the gene pool is being negatively impacted.

**Proposal 137. Oppose. Increase Dall Sheep hunting in Anchorage Management Area, South Eagle Fork drainage, and Ram Valley.** Proposal, 137, if adopted, would allow sheep hunting in areas where there has been no sheep hunting since the early 1970's. The Department's recommendation would open



Board of Game  
February 28, 2013  
Page 3 of 4

only about half of what is proposed.

I oppose opening any areas previously closed in the immediate vicinity of Anchorage. Falls Creek, Rainbow, and Ram Valley should not be opened to hunting. Non-hunters need places to go during hunting season where we can find refuge from hunters. So also do the sheep. It is a miscarriage of public policy to allow one hunter to kill a full curl sheep that hundreds of non-hunters enjoy seeing each year. This is Anchorage, not the Brooks Range.

I note that this proposal seems to ignore the statute creating Chugach State Park which provides that the purpose is the "display of local wildlife." Areas close to Anchorage are perfect for "the display". Let the hunters go elsewhere.

**Proposal 138. Oppose. Create a new drawing hunt for Dall Sheep near Anchorage.** See my comments to proposal 137.

**Proposal 139. Oppose. Open Ram Valley for the DS123 Sheep Drawing.** See my comments to proposal 137. I also want to point out that there is no legal access to Ram Valley. Friends of mine allow me (and other non-consumptive hikers) to cross their land on a trail they constructed. I doubt very much whether the man who proposed #139 spoke to them about whether they want hunters using their trail.

**Proposal 172. Support. Prohibit taking wolves March through November.** I oppose any trapping of wolves because it is cruel. Criminal liability is by law imposed on people who treat domestic animals in ways similar to the way trappers treat wolves and other furbearers. The day will come when our descendants will disapprove of Alaska's trappers (and officials who sanction them) in the same way we now disapprove of people who treat domestic animals with cruelty, or who slaughtered the buffalo of the American West in the Nineteenth Century.

Proposal 172 would allow trapping only when furs are in good shape, and would prohibit trapping when females are pregnant. In so doing, Proposal 172 focuses attention on the fact that trapping no longer is an important method by



Board of Game  
February 28, 2013  
Page 4 of 4

which Alaskans support a traditional life style, but instead, that trapping is promoted to unnaturally maximize moose, caribou and deer populations, or for the "sport" in killing wild animals.

I oppose both the unnatural, extreme methods currently employed to maximize "meat" animals, and I find repugnant the "sport" of trapping. So do many of my friends and contemporaries, and most Americans.

**Proposals 173-174. Support. Stopping bear snaring.** Bear snaring is cruel. As noted above, if these animals were domestic, snaring would be a crime under Alaskan law. Criminal liability attaches not only to deter this conduct but to send a message that treating animals in this fashion deserves societal condemnation. Shame on the State of Alaska and its policy makers for allowing snaring and trapping of bears, wolves, and other animals.

**Proposals 178A and 179A. Oppose. Killing Alexander Archipelago Wolves.** I do not claim to know whether these wolves are a distinct subspecies, or whether they should be listed as a threatened or endangered species by Federal authorities. But I prefer to protect these animals, rather than destroy them. Furthermore, I assume that the methods to kill all these wolves will include snaring and trapping, which is cruel. That the State engages in these practices will bring about national outrage if only someone can get pictures of State sanctioned trappers killing what may be an endangered species. I wish Gordon Haber were still alive to take pictures and show the world, as he did in the early 1990's.

Very truly yours,

A handwritten signature in cursive script, reading "Kneeland Taylor", is written over a horizontal line.

Kneeland Taylor



Sitka Field Office Box 6484 Sitka, Alaska 99835 907-747-7557

March 1, 2013

Alaska Board of Game  
c/o ADF&G, Boards Support Section  
by FAX: 907-465-6094

Subj: Comments on Proposals 178 and 178-A and the IM Operational Plan **for GMU 1A.**

Dear Board of Game members;

We request that you either disapprove Proposals 178 and 178-A for the reasons given herein or that you adopt the *substitute proposal* below. The proposals are for control of wolves on Gravina Island in Unit 1A for the purpose of deer intensive management. We incorporate by reference the comments on the feasibility assessments that we co-signed for the January Board of Game meeting (January PC-33 and January RC-13) as well as the testimonies by Larry Edwards, Paul Olson and Dave Beebe.

### **I. Our Recommendation and Request**

We recommend and request that the Board of Game strike the content of Proposals 178 and 178-A, and substitute and approve the following:

The Department of Fish & Game is directed to:

- (1) develop a program to establish a baseline of deer browse conditions on Gravina and Revillagigedo Islands and the Cleveland Peninsula, and a baseline of deer nutritional conditions in those areas, and to report the results to the Board; and
- (2) supply comments directly to the responsible federal or state agency, rather than through any other agency of state government, regarding proposed actions that may impair or benefit the State's game and wildlife resources or their habitat.

The Proposals and the Operational Plan do not comply with the *Board of Game Wolf Management Policy* (2011-185-BOG) or with ADF&G's 2011 *Intensive Management Protocol*. Also, the proposal is not cost effective and is likely to be generally ineffective. Reasons for these conclusions are explained below. Approving part (1) of the above substitute language will provide a way forward for understanding the deer-wolf-habitat situation in Unit-1A and particularly on Gravina Island.

Approving part (1) the substitute measure will still allow ADF&G to further develop its proposal for future consideration by the Board, would contribute to such an effort, and would also afford an opportunity for ADF&G to evaluate the alternative program we identify at the end of these comments.

Part (2) of the proposed substitute language is necessary to help ensure that the state's game, wildlife and habitat resources get the attention that they deserve from decisionmakers of development projects, toward avoiding significant impacts. Unit 1A, and Gravina Island in particular, are examples of how development decisions can cause significant game, wildlife and habitat losses that endure and affect people for decades. The relevant problem we identified in our comments and testimony for the January Board meeting is the State's "one-voice" policy. By this policy (as presently constructed), the comments of all state agencies are

filtered through the Department of Natural Resources. We believe the governor has the authority to advocate whatever position he has on a particular issue or development; however, we also believe that all the facts and expert opinions need to be on the table for the public and a decisionmaker to see and evaluate. Allowing the selective filtering of such information for political reasons or through a Department of Natural Resources that has removed the word "conservation" from its mission statement is contrary to good government and the duties, under the state Constitution, of this Board and the Department. Because the problem the Proposal is addressing is one largely due to habitat loss, we believe it is important for the Board to take this step now toward minimizing future losses here and elsewhere in the state.

## II. Reasons Proposals 178 and 178-A Should Be Disapproved

The Board should disapprove the proposals because although the Board is required to consider wolf control, implementing such control is discretionary and:

### 1. Proposals 178 and 178-A are contrary to the *Board of Game Wolf Management Policy (Findings 2011-185-BOG)* (herein "*Board Policy*").

#### A. The Board Policy states:

**"Under no circumstances** will wolf populations be eliminated ..., and wolves **will always** be managed to provide for sustained yield."

(At 2, *emph. added*). The Unit-1A proposals would exterminate the Gravina Island wolf population, which clearly violates the policy. In addition the sustained yield of Gravina Island wolves would be terminated for an unknown period, also clearly violating the Policy. Instead, the removal of only as much as a "high percentage" of wolves is contemplated by the Policy. (*Id.*). The two proposals fail the policy.

#### B. The Board Policy also states:

**"Once prey population objectives have been met, wolf populations will generally be allowed to increase to or above pre-control levels."**

(*Id.*). It is however quite possible that on Gravina Island the result of the IM project will be that an increase of wolves to the pre-control level will be biologically precluded. This is because, with the Gravina deer population likely already at "K" (carrying capacity) because of foraging damage to browse and loss of habitat from past logging (Operational Plan at 4), the increase in deer population caused by removal of predation may result in further damage to browse plants and a trophic collapse of the Gravina Island ecosystem. Or as the Operational Plan put it, the result "could be disastrous in the long term." (*Id.*). This is precisely what we pointed out in our comments on the Feasibility Assessment. The Unit-1A Proposals are contrary to the Board Policy's expectation that the wolf population will recover, because there is substantial risk that on Gravina Island this will not occur. Further, this risk is a failure:

**"... to ensure** that wolf numbers remain sufficient to maintain long-term sustained yield harvests" of wolves.

(*Id.* at 3, *emph. added*).

**2. Proposals 178 and 178-A are contrary to ADF&G's "Intensive Management Protocol" of December 2011 because Principle 1 of the Protocol is violated.**

These Proposals and the Operational Plan for Unit-1A **all fail to "guard against"** the potential "disastrous long term" consequence of the IM project that the latter document identifies (see above). This violates the basis of Principle 1 of *the Protocol*:

"Management of natural systems **requires** guarding against unintended consequences."

(Protocol at 4). It is also contrary to the Protocol's guideline that:

"Managers should **ensure** ungulate and predator populations **and their habitats** will be managed for their long-term sustainability."

(Id.). Merely identifying the unintended consequence does not satisfy the Protocol; the Plan must "guard" against it, and really "should ensure" against it. Moreover, the subject consequence for Unit-1A is quite similar to the example given in the Principle 1's *Rationale*. It is that an overabundant ungulate population, caused by reducing predation to a low level, might "damage their forage base and dramatically decline due to a lack of food." (Id.). Overabundance is a matter that is relative to the carrying capacity, and in the case of Gravina Island there is strong evidence (Op. Plan at 4 regarding forage) that even though the deer population is low it is already overabundant and the browse is degraded. Reducing predation can only worsen this situation.

Proposal 178-A (the *Intensive Management Plan*) would suspend wolf control if the deer population doubles. (IM Plan at 3, Op. Plan at 13). But what is the likely consequence of doubling the deer population, given current knowledge of the state of the browse on Gravina? None of the documents explore that key question, nor any other question regarding the impact to browse. Although "forage condition" is mentioned as a factor in the Operational Plan's sections on *Evaluation Criteria* (Sec. III, at 11) and the *Decision Framework* (Sec. IV, at 13), in fact no vegetation criteria were set and no decision-triggering vegetation thresholds were set. What is said is only that there will be vegetation monitoring, and that is insufficient. The Operational Plan does spell out: (1) criteria and thresholds regarding browse condition; (2) the protocol for determining browse condition, whether criteria are met and whether thresholds are approached or exceeded; (3) who will do the monitoring or how it will be organized; and (4) what it will cost and how the cost is allocated in the project budget. In short, there is no "operational plan" regarding the crucial element of browse condition.

**3. The *Decision Frameworks* in the Operational Plans for Proposals 178, 179, 178-A and 179-A violate Principle 4 of ADF&G's "Intensive Management Protocol" of December 2011.**

The Decision Framework for an IM program is expected to be "transparent" and "explicit." (Protocol at 6, title of Principle 4), but several elements of the Decision Framework (Sec. IV) of the Operational Plan are neither.

i. The Op. Plan's threshold a) for Deer Abundance *is operative only at the end of the program, i.e. "after 5 years"*. (At 13, part of Decision Framework). The Op. Plan is not transparent or explicit about what action will or should occur if this threshold for deer abundance is achieved in mid-program, nor does it discuss the possibility of such occurrence at all. This threshold is the attainment of a doubling of deer population according to at least two of four specified indicators. Figure 1 of the Op. Plan shows that one indicator of deer abundance has recently had two years of consistent increase in the absence of wolf control. Therefore it seems possible that the population may be able double in less than five years, even in the absence of wolf control.

ii. Thresholds a) and c) concern attaining a doubling of the Gravina Island deer population. (Id.). They are not “transparent” and “explicit” about either the estimated quantity of deer that will be the basis of estimating a doubling of abundance or what number of deer will be considered to constitute a doubling. (Id.). Ultimately, however, what matters are: 1) the resulting number of deer; 2) how that number relates to winter carrying capacity; and 3) how (as the Feasibility Assessment stated) that number relates to hunter demand and (more reasonably set, we contend) deer population and harvest objectives.

iii. Collectively, the four thresholds do not cover the possible outcome that the program might successfully exterminate wolves on deer population does not double (e.g. perhaps due to severe winters). In this case threshold c) is controlling, but it contemplates only “find[ing] ways to improve the trapping program,” which is nonsensical if wolves have been extirpated.

iv. Deer Abundance thresholds a) through c) are contrary to the intent of the Unit-1A wolf control program as it was presented to the public and the Board in the October 2012 Feasibility Assessment. That intent was for a five year wolf control program. These thresholds instead set up an administrative decision whether or not to suspend the control program at the end of the five years. Thus, the Department is reserving to itself the decision on extending the program, instead of making a formal proposal to the Board to do so. These thresholds are therefore improper.

Instead, the thresholds should be written to collectively provide a “decision framework” to provide a means to suspend the program early if the goal of prey doubling is attained early.

v. The content of threshold d) regarding “vegetation plots” is by no means a threshold, but rather expresses only an intent to conduct monitoring to gain insight into the deer/habitat relationship on Gravina Island. (Id.). This content belongs somewhere else in the Op. Plan, and moreover it needs to be expanded to transparently and explicitly explain the protocol that will be used for the monitoring, the metrics that will be used and how the information will be evaluated toward gaining insights.

However, the Decision Framework does need to have an effective vegetative threshold for determining whether the control program should be suspended before its termination date. It is shocking that this crucial element is missing from deer abundance thresholds, because the Op. Plan itself has pointed out that the wolf control program could result in further degradation of already degraded browse on Gravina Island, and could “be disastrous in the long term” as a result. (Op. Plan at 4). Monitoring is not a “decision framework,” although it is a necessary element of such a framework. The Operational Plan needs to specify a “transparent and explicit” mechanism for ensuring appropriate action if the wolf control program further impairs deer habitat quality. Moreover, an adequate baseline needs to be established before wolf control begins, and the time and means to establish the baseline has not been provided for in the Operational Plan.

vi. The *Prey Harvest* element of the Operational Plan’s *Prey Harvest Strategy* (another element of the Decision Framework) has a non-transparent, non-explicit expectation for “a 20-25% annual increase in deer numbers” if the IM program is successful. (Op. Plan at 14). The problem here is that this does not disclose any real numbers (i.e. population for Gravina Island), and the compounding interest is most likely unrealistic given current knowledge of the degraded state of the browse on the island. A 20% compounding of population over five years is a tripling of population. A 25% compounding is nearly a quadrupling. Can the crucial winter browse on the island, given the loss of this habitat to logging both recently and over recent decades, tolerate these increases in deer population without triggering the possible “disastrous long term” consequences Op. Plan’s Background section discloses? (See at 4). Bear in mind that the habitat impacts much of the past logging are not yet fully realized, since canopy closure of the second growth takes 25 to 40 years. The Operational

Plan violates *the Protocol's* Principle 4 because it is not transparent, not explicit – and irrationally it does not establish a “prey harvest strategy” that is related to the obviously limited capability of Gravina’s habitat.

vii. The *Prey Nutritional Index* element of the Operational Plan’s *Prey Harvest Strategy* (another element of the Decision Framework) discusses an “objective” of monitoring deer body condition. (Op. Plan at 14-15). However, this subsection does not establish a decisionmaking framework for what range of actions the program will take based on the range of body condition results that may be obtained from the monitoring. This is related in part to the vegetative condition issue as discussed in item v., above, and much of the thrust of that argument applies here as well, including a need to a baseline before wolf control begins.

#### **4. Proposals 178 and 178-A are not feasible due high cost and likely ineffectiveness.**

The Operational Plan claims that a “cost efficient predator control strategy” will be used. (Op. Plan at 4). However, as we pointed out in our comments and testimony for the January Board of Game meeting, the program for Gravina Island is anything but cost efficient. In our comments (January PC33 at 11) we estimated that the elimination of the wolves on Gravina Island may result in “a population increase of 208 [deer that may] result in a harvest increase of only 9 deer. The cost per additional deer that can be expected to be harvested would exceed the range of \$43,900 to \$52,200, each.”

The Board of Game has delayed consideration of the cost of the Unit-1A proposal until the March meeting. ADF&G has not provided any further cost discussions in the materials it has provided for the March meeting, nor has it contested our cost figures. Even as an experiment, we do not believe the cost of the proposals can be justified.

Moreover, the Board considered material from ADF&G in 2000, when deliberating on deer population and harvest objectives, which supports our contention that wolf control in Southeast Alaska is overly expensive (not “cost efficient”) and likely to be ineffective:

With the notable exception of ensuring maintenance of existing old-growth forests, **little can be done to increase deer densities in Southeast Alaska.**

Wolf control efforts in the 1980s in Southeast Alaska **were found. to be expensive, time consumptive, and ineffective.**

(*Intensive Management Population Identification Worksheet*, at 2, 8 and 10, *emph. added*. Provided as Attachment-1).<sup>1</sup> From October to the present, ADF&G has not presented any documents to the public or the board that discuss these findings from the 1980s and the importance that was placed on them for the Board of Game’s 2000 deliberations. In the absence of a whole record for public and the Board to consider, Proposals 178 and 178-A should be disapproved because it is apparently likely that the wolf control program will be inordinately expensive (as we already know) and ineffective.

Moreover, scarce funds in a smaller amount should instead be spent at this time for developing the baselines that we flagged above as needed, for browse quality and deer nutritional index. If any wolf control actions are taken here, they need to be based on good baselines and a solid understanding of condition of the habitat and the deer that use it – at present we have neither for Gravina Island or the proposed control area.

<sup>1</sup> This document was obtained through a February 2013 request to Board staff for deer-related materials that were considered by the Board in 2000.

We recommend that the Board strike the content of Proposals 178 and 178-A and substitute language directing ADF&G to develop the two baselines and report to the Board on: (1) the conditions of deer habitat, (2) the nutritional condition of the deer population on Gravina Island particularly and more broadly in Unit-1A, and (3) more particulars of the findings of the 1980s wolf control efforts. There is no emergency dictating immediate initiation of a wolf control program on the island or in Unit-1A, and a methodical scientific approach should be taken instead.

**5. The deer population and harvest objectives were set much too high because of: (1) faulty modeling the objectives were based on, and (2) unusually high harvest in immediately preceding years.**

As discussed in our comments and testimony for the January Board of Game meeting, the deer population and harvest objectives were set much too high by the Board in 2000. (Pages 2-5 of comments January PC33, and corrected table in January RC13, included here, as corrected in January, as Attachment-2).

As shown in the box at the bottom of Figure 2 in Attachment-2, the winter deer habitat modeling ADF&G relied upon when advising the Board in 2000 on setting deer objectives for Unit-1A gave results now known to have greatly over-estimated carrying capacity. The over-estimation for 39% for all of Unit-1A and 38% for Gravina Island. Other places important for Ketchikan hunters were also over-estimated, by 60% for Revillagiedo Island and 34% for the Cleveland Peninsula.

Because Proposals 178 and 178-A are largely driven by an impetus to meet the 2000 objectives, the only way the Board could rationally approve the Proposals would be to first reconsider the objectives through a formal process.

Two other related factors militate for disapproving the Proposals at this time. The 2000 objectives were based on harvests from several years earlier when harvests were at a peak, in a period of generally mild winters. (See Feasibility Assessment; see also Op. Plan Fig. 1). Following the closure of the Ketchikan Pulp Mill in 1997, the demographics of the area changed and the number of hunters and hunter effort decreased. From two years later, in 1999, hunter effort was fairly consistent until the hard winters of 2006/2007 and 2008/2009. (Fig. 1, noting that 1991 and 2005 are outliers). Despite the two hard winters, deer harvest began recovering in 2009 and 2010.

Also, low deer numbers should currently be expected in Unit-1A a due to the combined effects of (1) marginal to low carrying capacities naturally; (2) lower carrying capacities now due to winter habitat loss to logging; and (3) the recent hard winters. Notably, except for Duke Island, all portions of Unit-1A are markedly below the 18 deer/sq-mile threshold developed by ADF&G scientists (with others) which is a minimum for providing both for viable wolf populations and the needs of hunters.

Under the *Board of Game Wolf Management Policy* (2011-185-BOG), the paucity of suitable winter habitat creates a situation where wolf control is not a suitable solution to low deer harvest. Given the circumstances, we believe a likely outcome of a board approval of wolf control in Unit-1A is likely to be assurance of an ESA listing of the Alexander Archipelago wolf under the petition that is pending with the US Fish & Wildlife Service.

**6. An alternative to wolf extermination should be considered.**

The Unit-1A Operational Plan cites Smith (1983), which was not included in the References section. Noting this, we obtained a Smith document from ADF&G, which turned out to be Smith et al. (1987), *Final Report (Research): Wolf-Deer-Habitat Relationships in Southeast Alaska*. (Included as Attachment-3). The study was of radio-collared wolves on Revillagiedo Island, and tracked five packs for two years. The study was terminated three

years early because of adverse weather, low densities of deer and wolf populations, budget shortfalls and personnel reductions.

An interesting aspect of the study is the Town Pack, which had a remarkably lower fawn composition in the diet (11.9%, versus the next-best 37.1% and the highest 60.6%). The percentage of adult deer in the diet was the second lowest (versus a pack that preyed heavily on beaver and had the highest non-deer diet component). Interestingly, the Town Pack's diet was 39% garbage from the Ketchikan landfill.

This suggests that an alternative way to reduce the deer and fawn components of the diet of Gravina wolves may be, as an experiment, to regularly provide food scraps at various points along or near remote parts of the Gravina road system. These partial dietary substitutions should be placed where wolves will encounter them and away from areas being frequented by deer, and should be planned so wolves will have a degree of expectation among several particular places. Of course concerns would include habituation and public safety; however, the Town Pack apparently used the Ketchikan dump for years, and some accessible portions of Gravina Island are more remote than that. It may have value at least as an experiment apart from its potential as a long-term solution.

A scraps collection program with restaurants or citizens, for deposit or collection on particular days, could provide the feed. The program could have an educational component for students and the public at large, and perhaps could have a tourism aspect through viewing stations near enough to the various feeding sites for spotting scopes.

While outside-the-box, this alternative may help boost deer recovery and harvest numbers, and might possibly be able to continue at potentially little cost to the state, for decades to come. One advantage over Proposals 178 and 178-A is that the wolf population would remain in place, so if the increasing deer population does end up further decreasing browse (winter browse especially) and predation is needed to control it, ending or reducing the feeding is a ready solution.

Sincerely,



Larry Edwards  
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Sitka, Ak 99835  
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<b>Attachment - 1</b>
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## Intensive Management Population Identification Worksheet

Species: Deer

Population: Unit 1A

**Brief description of the population:**

This deer population inhabits the mainland and near-shore islands in Unit 1A. Densities have generally been highest on the lower Cleveland Peninsula and Gravina Island. Densities are lowest on the mainland east of Ketchikan where very limited deer hunting occurs. Buck-only harvests, with a 4-buck limit, have been in effect in the unit for the past 20 years.

**Criterion #1 - Harvest:**

- a. Maximum average harvest for any 3 consecutive years: 788 during 1994-1996.
- b. Estimated average harvest for 1991-1996: 652

**Criterion #2: - Accessibility:**

Most access is by boat, some by floatplane. Highway vehicles are used to access areas on the limited Ketchikan road system, and 3- and 4-wheelers are used occasionally to access areas associated with remote logging roads. Boat and airplane access is extremely weather-dependent.

**Criterion #3: - Use for meat:**

Alaska residents, primarily those residing within the Ketchikan Gateway Borough, use this population of deer primarily for meat and recreation.

**Criterion #4 - Hunter demand:**

- a. Estimated or reported hunter effort: During 1991-1995, hunters spent a seasonal average of 4,534 days hunting deer. Effort data was not collected during 1996.
- b. Number of applicants for permit hunts, if applicable: NA
- c. Other indicators of demand: None

**Is this population important for providing high levels of human consumptive use?**

Department Recommendation:

Yes:   X  

No: \_\_\_\_\_

Board of Game Action:

Yes:   X  

No: \_\_\_\_\_

## Intensive Management Objective Worksheet

Species: Deer

Population: Unit 1A

- (1) **Effects of weather, habitat capability, diseases and parasites:** Diseases and parasites appear to have negligible impact on deer populations in Unit 1A. Severe winter weather causes periodic declines in the deer population, especially in areas where clear-cut logging has removed old-growth forests. Among other deleterious effects, the removal of the old-growth canopy allows snow accumulation on the ground above "normal" levels, limiting the value of critical habitat to support over-wintering deer populations.
- (2) **Maintenance of viable predator populations:** Brown bear predation on deer is apparently negligible. We believe that black bear predation on deer is significant where they occur at high densities. Anecdotal evidence supports the idea that scavenging of deer carcasses by brown bears, marten, and bald eagles may provide periodic food resources, but is probably not important for maintaining these populations. Deer are the mainstay of the diet of wolves in this unit.
- (3) **Maintenance of habitat conditions suitable for other species in the area:** Evidence suggests that deer and mountain goats may compete for limited food resources in some limited situations. However, for current deer and goat population levels in Unit 1A, there appears to be no direct correlation in terms of population densities.
- (4) **Effects on subsistence users:** The islands and the Cleveland Peninsula portion of Unit 1A are in the Ketchikan Nonsubsistence Area, and make up most of the quality deer habitat in the Unit. Subsistence use of deer in Unit 1A depends largely on deer abundance. As deer numbers increase following mild winters, hunter effort increases proportionately. Deer meat provides a considerable amount of the red meat for consumption by Unit 1A residents, as the only other available ungulates are mountain goats (common) and moose (scarce).
- (5) **Cost, feasibility, and potential effectiveness of possible management actions:** With the notable exception of ensuring maintenance of existing old-growth forests, little can be done to increase deer densities in Southeast Alaska. The ADF&G needs to continue working with the US Forest Service and private landowners in an effort to maintain quality habitat. Where logging occurs it is imperative that proliferating human access be minimized by strict attention to road placement, administrative and/or mechanical road closures after logging, and regulations that ensure viable deer populations.
- (6) **Land ownership patterns within the range of the population:** The vast majority of deer habitat in Unit 1A is under federal jurisdiction of the Tongass National Forest. In addition, a portion of the mainland is designated as the Misty Fjords National Monument within the Tongass.



- (7) **Degree of accessibility to harvest:** Accessibility by boat is very good throughout the area. The only areas largely inaccessible are parts of the mainland away from the coast, where deer habitat is limited because of high elevations and snow and ice cover.
- (8) **Other factors, if any:** Since 1990, both state and federal subsistence hunting regulations have been in effect. State regulations were adopted by the Alaska Board of Game and applied to all lands in Unit 1A. State and federal deer hunting regulations remain identical in the Unit.

**Department Recommended Objectives:**

Population	<u>14781</u>	^
Harvest	<u>725</u>	

Current management objectives for Unit 1A deer are to: 1) maintain a population in excess of 45 deer per mi<sup>2</sup> of winter range (1.4 pellet-groups per plot); and 2) monitor deer densities using pellet-group surveys.



**Board Action:**

- Objectives:
- 1. Population: 15000
  - 2. Harvest: 700

## Intensive Management Population Identification Worksheet

Species: Deer

Name of the Population: Unit 1C

**Brief description of the population:**

Deer are found throughout Unit 1C, but the highest concentrations are found on three islands Douglas, Shelter, and Lincoln. Deer are also found on the mainland in very low densities due to a greater snowpack and the presence of wolves.

**Criterion #1 - Harvest:**

- a. Maximum average harvest for any 3 consecutive years: 583
- b. Estimated average harvest for 1991-1997: 467

**Criterion #2 - Accessibility:**

Portions of the Unit 1C mainland and Douglas Island are accessible by highway vehicle. Hunters also use boats to access the south and western sides of Douglas Island, as well as Shelter and Lincoln Islands.

**Criterion #3 - Use for meat:**

Considering the limited opportunities available for harvesting moose in Unit 1C, most hunters secure wild meat through the harvest of local deer. Deer hunting is also an important recreational activity for Juneau area residents.

**Criterion #4 - Hunter Demand:**

- a. Estimated or reported hunter effort: From 1991-1995 the average number of hunters/year was 939, and these hunters combined for 3,324 hunter days. 1996 and 1997 data is only available for successful hunters, and therefore not included in the above average.
- b. Number of applicants for permit hunts, if applicable: NA
- c. Other indicators of demand: The deer hunter survey indicates hunters pursue deer throughout the 3-½ month season in Unit 1C.

**Is this population important for providing high levels of human consumptive use?**

Department Recommendation:

Yes:   X    
 No:

Board of Game Action:

Yes:   X    
 No:

## Intensive Management Objective Worksheet

Species: Deer

Population: Unit 1C

- (1) **Effects of weather, habitat capability, diseases and parasites:** Winter weather, especially deep and persistent snow, is a critical factor in regulating deer numbers. Deep snow hinders foraging ability of deer by limiting mobility, increasing energy expenditure, and by concentrating deer at lower elevations which increases intraspecific competition. Altitude, aspect, and browse species availability can severely limit habitat quality and quantity, and high deer densities result in starvation or increased susceptibility to predation caused by the poor nutritional state of the animals (Olson, 1979). Unit 1C has both mainland and island deer habitat. Douglas, Lincoln, and Shelter islands harbor higher deer densities than the mainland because of lower snowfall, mostly undisturbed forest habitat, and lack of wolves. These easily accessible islands support most of the deer hunting effort within the subunit. The capability of the habitat to support deer in Southeast Alaska is dependent on the amount of mature forest available. Diseases and parasites do not appear to be factors limiting deer populations in Southeast Alaska.
- (2) **Maintenance of viable predator populations:** Mainland deer densities are low enough that wolves rely upon a wide array of prey to subsist, and wolves in this area are not highly dependent on deer. On the islands within the subunit, wolves are virtually absent. We believe that black bear predation on deer is significant where bears occur in high densities. Anecdotal evidence supports the idea that scavenging of deer carcasses by marten and bald eagles may provide periodic food resources, but is probably not important for maintaining these populations. Changes in human harvest objectives would most likely occur on the islands, where changes in deer numbers would not have a substantial effect on predators.
- (3) **Maintenance of habitat conditions suitable for other species in the area:** Long term planning to maintain large tracts of mature forest is the only way of sustaining a viable deer population. Other species that use mature forests would benefit by having habitat available to them. Deer and mountain goats compete for limited food resources in some limited situations. However, for current deer and goat population levels in Unit 1C, there appears to be no direct correlation in terms of population densities.
- (4) **Effects on subsistence users:** Subsistence use of deer in Unit 1C depends largely on deer abundance. As deer numbers increase following mild winters, hunter effort and success increases proportionately. Deer meat provides most wild red meat for consumption by Unit 1C residents, with moose and mountain goats supplementing deer meat.
- (5) **Cost, feasibility and potential effectiveness of possible management actions:** We believe that predation is not a substantial problem for deer in this subunit, and attempts at predator control would be extremely costly. Mainland snowfall is heavy enough that even in the absence of predators it is unlikely that deer numbers will ever increase substantially. It is not



feasible to enhance mature forest habitats, which are key to the well being of the deer herd. Retention of critical habitat is a key management strategy.

- (6) **Land ownership patterns within the range of the population:** Significant private and municipal land ownership is an issue in the area, and our ability to control development on these tracts of land is limited. Douglas Island deer winter range is in private and municipal ownership and may be developed for residences and a golf course.
- (7) **Degree of accessibility to harvest:** Island deer habitat in Unit 1C is easily accessible from the state's third largest city by road system, trails, and boat. Away from mainland roads and trails access is more difficult.
- (8) **Other factors, if any:** If the Juneau human population continues to grow, there will likely be an increase in deer hunting effort. Given the easy access, deer in this area could be susceptible to overharvest.

**Department Recommended Objectives:**

Population 6240

Harvest 450

\*\*\*\*\*

**Board Action:**

Objectives:

1. Population: \_\_\_\_\_

2. Harvest: \_\_\_\_\_

## Intensive Management Population Identification Worksheet

Species: Deer

Population: Unit 2

**Brief description of the population:**

This deer population inhabits Prince of Wales and adjacent islands. Densities have fluctuated historically, primarily in response to winter weather conditions, although predation by wolves and black bears contributes to annual mortality. Deer are known to travel between islands, as are their predators.

**Criterion #1 – Harvest:**

- a. Maximum average harvest for any 3 consecutive years: 2,970 during 1993–1995.
- b. Estimated average harvest for 1991–1996: 2,831

**Criterion #2: - Accessibility:**

Most hunters access deer with highway and off-road vehicles on the extensive road system found on central to northern POW Island. A few hunters access alpine lakes early in the season with floatplanes, and some travel to small offshore islands by boat.

**Criterion #3: – Use for meat:**

Primarily Alaska residents residing on Prince of Wales Island use this deer population for meat and recreation. Several Ketchikan residents travel to Unit 2 each season to hunt deer for meat and recreation as well.

**Criterion #4 – Hunter demand:**

- a. Estimated or reported hunter effort: During 1991 –1995, hunters spent a seasonal average of 12,242 days hunting deer in Unit 2. Effort data was not collected during 1996.
- b. Number of applicants for permit hunts, if applicable: NA
- c. Other indicators of demand: None

**Is this population important for providing high levels of human consumptive use?**

Department Recommendation:

Yes:   X    
 No:

Board of Game Action:

Yes:   X    
 No:

## Intensive Management Objective Worksheet

Species: Deer

Population: Unit 2

- (1) **Effects of weather, habitat capability, diseases and parasites:** Diseases and parasites appear to have negligible impact on deer populations in Unit 2. Severe winter weather causes periodic declines in the deer population, especially in areas where clear-cut logging has removed old-growth forests. Among other deleterious effects, the removal of the old-growth canopy allows snow accumulation on the ground above "normal" levels, limiting the value of critical habitat to support overwintering deer populations. Prince of Wales Island has seen some of the more aggressive logging in Southeast Alaska, and within the next 20–30 years we anticipate deer habitat capacity to decrease substantially.
- (2) **Maintenance of viable predator populations:** Wolf populations are healthy in Unit 2 and can effect deer populations at least in local areas. We believe that black bear predation on deer is significant where bears occur in high densities. Anecdotal evidence supports the idea that scavenging of deer carcasses by marten and bald eagles may provide periodic food resources, but is probably not important for maintaining these populations. Deer are the mainstay of the diet of wolves in this unit.
- (3) **Maintenance of habitat conditions suitable for other species in the area:** There are no other ungulate populations in Unit 2 that deer compete with, although marten exist in the unit and have been shown to be old-growth dependent.
- (4) **Effects on subsistence users:** Subsistence use of deer in Unit 2 depends largely on deer abundance. As deer numbers increase following mild winters, hunter effort increases proportionately. Deer meat provides a large proportion of the red meat for consumption by Unit 2 residents, although there is significant use of seals and some amount of use of black bears.
- (5) **Cost, feasibility, and potential effectiveness of possible management actions:** With the notable exception of ensuring maintenance of existing old-growth forests, little can be done to increase deer densities in Southeast Alaska. The ADF&G needs to continue working with the US Forest Service and private landowners in an effort to maintain quality habitat. Where logging occurs it is imperative that proliferating human access be minimized by strict attention to road placement, administrative and/or mechanical road closures after logging, and regulations that ensure viable deer populations. Wolf control efforts in the 1980s in Southeast Alaska were found to be expensive, time consumptive, and ineffective.
- (6) **Land ownership patterns within the range of the population:** Most of the deer habitat in Unit 2 is under federal jurisdiction of the Tongass National Forest, although private corporations own a considerable amount of land in this Unit.



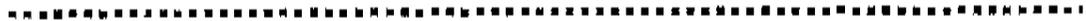
(7) **Degree of accessibility to harvest:** Accessibility by boat and highway vehicles is very good throughout most of the area. Off road vehicle use is increasing by deer hunters.

(8) **Other factors, if any:** Since 1990 both state and federal subsistence hunting regulations have been in effect. State regulations were adopted by the Alaska Board of Game and applied to all lands in Unit 2. In recent years there has been a federal doe season in Unit 2 that is only open to federally qualified subsistence hunters (rural residents of Units 1A, 2, and 3).

**Department Recommended Objectives:**

Population	<u>71248</u>
Harvest	<u>2728</u>

Current management objectives for Unit 2 deer are to: 1) maintain a population in excess of 45 deer per mi<sup>2</sup> of winter range (1.4 pellet-groups per plot); and 2) monitor deer densities using pellet-group surveys.



**Board Action:**

Objectives:

1. Population: 71,000
2. Harvest: 2,700

## Intensive Management Objective Worksheet

Species: Deer

Population: Unit 3

- (1) **Effects of weather, habitat capability, diseases and parasites:** Diseases and parasites appear to have negligible impact on deer populations in Unit 3. Severe winter weather causes periodic declines in the deer population, especially in areas where clear-cut logging has removed old-growth forests. Among other deleterious effects, the removal of the old-growth canopy allows snow accumulation on the ground above "normal" levels, limiting the value of critical habitat to support over-wintering deer populations.
- (2) **Maintenance of viable predator populations:** Wolf populations are healthy in Unit 3 and can effect deer populations at least in local areas. We believe that black bear predation on deer is significant where bears occur in high densities. Anecdotal evidence supports the idea that scavenging of deer carcasses by marten and bald eagles may provide periodic food resources, but is probably not important for maintaining these populations. Deer are the mainstay of the diet of wolves in this unit.
- (3) **Maintenance of habitat conditions suitable for other species in the area:** Evidence suggests that deer, moose, and elk may compete for limited food resources in some situations. However, for current deer, moose, and elk population levels in Unit 3, there appears to be no direct correlation in terms of population densities.
- (4) **Effects on subsistence users:** Subsistence use of deer in Unit 3 depends largely on deer abundance. As deer numbers increase following mild winters, hunter effort increases proportionately. Deer meat provides a large proportion of the red meat for consumption by Unit 3 residents, although there is significant use of moose and black bears.
- (5) **Cost, feasibility, and potential effectiveness of possible management actions:** Protecting old-growth forests and treating second growth clear cuts can maintain existing deer densities in Southeast Alaska. The ADF&G needs to continue working with the US Forest Service and private landowners in an effort to maintain quality habitat. Where logging occurs it is imperative that proliferating human access be minimized by strict attention to road placement, administrative and/or mechanical road closures after logging, and regulations that ensure viable deer populations. Wolf control efforts in the 1980s in Southeast Alaska were found to be expensive, time consumptive, and ineffective.
- (6) **Land ownership patterns within the range of the population:** Most deer habitat in Unit 3 is under federal jurisdiction of the Tongass National Forest, although a private corporation owns a large section of north Kupreanof Island.



- (7) **Degree of accessibility to harvest:** Accessibility by boat is good throughout most of the area. Highway vehicle access is good on islands with communities.
- (8) **Other factors, if any:** Since 1990 both state and federal subsistence hunting regulations have been in effect. State regulations were adopted by the Alaska Board of Game and applied to all lands in Unit 3. State and federal deer hunting regulations remain identical in Unit 3.

**Department Recommended Objectives:**

Population	<u>14868</u>
Harvest	<u>852</u>

Current management objectives for Unit 3 deer are to: Increase populations on deer winter range (<1,500 ft elevation) to 32 deer/mi<sup>2</sup>, measured by a mean pellet density of 1.0 pellet group/20m<sup>2</sup> plot.

**Board Action:**

Objectives:

- 1. Population: 15,000
- 2. Harvest: 900

C  
7-0

**Attachment - 2**

**Excerpt of comments  
PC33, as corrected by  
RC13, from the Jan.  
Board of Game meeting**

- Greater SE Alaska Conservation Community • Alaska Wildlife Alliance •
- Tongass Conservation Society • Greenpeace • Center for Biological Diversity •

Alaska Board of Game  
 c/o ADF&G, Boards Support Section  
 by FAX: 907-465-4094

December 28, 2012

Subj: **Unit 1A:** Comments on "*Feasibility Assessment ... Black-tailed deer*"

...

**II. The Deer Objectives Are Outdated and Therefore Do Not Support Wolf IM.**

The current objectives for deer population and deer harvest in Unit-1A are outdated because they are based on older deer modeling which produced over-estimates of the carrying capacity of winter habitat.

**A. The current deer objectives for Unit 1-A, and how they were determined.**

The current deer population and harvest objectives for Unit-1A were adopted by the Board of Game in 2000, setting them at 15,000 and 700 respectively. (Assessment at 7). They are based in large part on the Forest Service's 1997 deer model, which was used to estimate the winter carrying capacity of the habitat for deer, and on harvest rates from 1994 to 1999 which were the peak years for the Unit. (Id.). The Assessment itself recognizes that these objectives are "unrealistically high." (Assessment at 7, 18). Over the past five years the Unit-1A deer harvest ranged from 154 to 309 (Assessment at 7), but this does not include illegal take which the department estimates to be around 50% of the harvest estimated from hunter surveys. (Assessment at 30, 36). Thus, the actual total harvest over the past five years likely ranged from about 230 to 460, in comparison to the 700. This approaches two-thirds of the objective.

**B. Problems with the deer model results that the harvest objective was based upon.**

The Board of Game, in its 2000 determination of Unit-1A deer population and harvest objectives, relied upon deer carrying capacity data from the Forest Service's 1997 deer model. (Assessment at 7, 18). The Forest Service updated its model for the 2008 Tongass Forest Plan, and the new model<sup>1</sup> makes significantly lower carrying capacity estimates.

<sup>1</sup> When we speak here of a "version" of the model, this encompasses the core of the model and the vegetative data and directives for some external settings that are used when carrying capacity in deer

Three corrections made to the model since 2000 were substantial:

(1) In its FY-2000 Monitoring & Evaluation Report (published April 2001),<sup>2</sup> the Forest Service corrected the conversion factor (called the Deer Multiplier) used to change the model's non-dimensional output to carrying capacity in deer per square mile, from 125 to 100.<sup>3</sup> The Deer Multiplier is based on deer pellet transect data, and is the carrying capacity of best quality habitat (of which very little exists). The older model results in over-estimated carrying capacity by 25%. From the information in the Assessment we don't know which multiplier had been used when the Board of Game set the Unit-1A objectives.

However, regarding the Deer Multiplier, Gravina Island is a special case as ADF&G itself explained to the Forest Service in 2002 regarding the Gravina Island Timber Sale Project:<sup>4</sup>

**"Deer model.** Our concerns for sustainability of deer harvests on Gravina stem in part from the reported results of runs of the deer model for the DEIS, as well as analysis of hunter demand. The coefficients used for these runs very likely underestimate the effects of the project upon deer, leading to overly optimistic projections of true deer numbers and future availability. The model was run with a multiplier of 125 deer per square mile, as directed by the 1997 Forest Plan, although a multiplier of 100 deer per square mile has been recommended by both FS and ADF&G biologists.

In the September 13 meeting, Gene DeGayner indicated that the FS intends to use a multiplier of 100 deer per square mile for habitat scores of 1.0 from this point forward, unless project-level data suggest otherwise. In general, ADF&G recommends assuming a maximum **year-round** carrying capacity of 35 to 40 deer per square mile in the best habitat. After consultation with ADF&G research biologists Matt Kirchhoff and Dave Person, **we recommend equating a multiplier of 35 deer per square mile to a score of 1.0 for the Gravina project area**, due to the lack of high-value alpine habitat, indicating a non-migratory deer population that occupies the area all year, with little seasonal variation. (See the Appendix for a more detailed discussion of application of the deer model.)"

(ADF&G Habitat Div. letter to Alaska OMB, 12 Dec. 2002, at 3 to 4. Orig. emph.). Thus, for Gravina Island, reliance on Deer Multipliers of 125 or 100 would result in over-estimations of carrying capacity of a factor of 3.57 (a 257% over-estimation) or 2.85 (a 185% over-estimation).

(2) In 2008 the Forest Service made a further correction to use of the Deer Multiplier.<sup>5</sup> From 1997 through 2007 the scale for the non-dimensional habitat value outputs was a range "habitat suitability index (HSI)" of from zero to 1.3. The value 1.3 represents best

---

per square mile is calculated from the model's non-dimensional output. The core of the model has not changed over the years, only the other factors in its application.

<sup>2</sup> USFS R10-MB-431, at 2-155.

<sup>3</sup> The multiplier represents the winter carrying capacity of the highest quality habitat type; however, this kind of habitat is scarce.

<sup>4</sup> This timber sale project was not executed. As a result of an administrative appeal of the project decision (Greenpeace et al. 2004) to the next highest level of the Forest Service, the project decision was withdrawn. However, since that time a significant amount of logging in high quality deer habitat has occurred on Gravina Island, done under timber sales by Alaska DNR and the Alaska Mental Health Trust.

<sup>5</sup> 2008 *Tongass Forest Plan (TLMP) FEIS*, at 3-266: "HSI values were standardized to range from 0 to 1.0, by dividing all values by 1.3, because outputs from such models represent a range from 0 to 100 percent habitat suitability, with higher values indicating higher habitat capability." Also at 3-284 in footnote 2: "Habitat capability in terms of deer density calculated using a multiplier of 100 deer persquare mile equating to a habitat suitability index score of 1.0."

quality habitat. However, the way the Deer Multiplier was used during those years, it corresponded to a value of 1.0 in that range, which is incorrect and results in a 30% over-estimation of carrying capacity. If these and the previous error were both present in the data the Board considered in setting the objectives, the total error was a 62.5% carrying capacity over-estimation.

(3) The vegetative dataset used in the 1997 deer model was later found by a Forest Service statistical study to be uncorrelated to habitat quality. (Caouette et al. 2000).<sup>6</sup> An adequate dataset was not used until adoption of the 2008 Tongass Forest Plan. The new dataset “results in an overall reduction in average HSI<sup>7</sup> values because fewer stands would be classified as high and medium volume strata and more stands would be classified as low volume strata compared to the old volume strata mapping used in the 1997 Forest Plan Revision Final EIS.” (2008 Forest Plan FEIS at 3-265 to 266). This change resulted in significantly lower carrying capacity estimates by the new model, nearly everywhere in the Tongass, but the changes were not the same everywhere because the previous dataset’s non-correlation to habitat quality had made the amount of error erratic.

### **C. The Amount of Deer Modeling Error, As Incorporated in the Unit-1A Objectives.**

The 2008 corrections made by the Forest Service to its 1997 modeling of deer winter habitat carrying capacity indicate that the 1997 modeling made these over-estimations:

**Fig. 1: Over-estimations of the earlier model.**

Unit 1-A	<b>39%</b>	<b>Over-estimation</b>
Gravina Island	<b>38%<sup>8</sup></b>	<b>Over-estimation</b>
Revillagigedo Island	<b>60%</b>	<b>Over-estimation</b>
Cleveland Peninsula	<b>34%</b>	<b>Over-estimation</b>

(See calculations in Fig. 2, next page.) But percentages don’t tell the whole story. The Tongass Forest Plan has a standard and guideline of providing a deer habitat carrying capacity of at least 18 deer per square mile (where possible), in order to sustain both wolves and deer hunters. ADF&G has advocated the use of this standard and guideline (S&G), and the department played a major role in its adoption by the Forest Service. Note in Fig. 2 that according to the 1997 modeling that two major historic hunting areas for Ketchikan residents, the Cleveland Peninsula and Revillagigedo Island, scored above the S&G at 18.8 and 18.3 deer per square mile, respectively. However, according to the 2008 model for the current (2006) condition they scored well below the S&G at 13.6 and 11.7 deer per square mile. Moreover, Gravina Island was already below the S&G in 1995 at 13.0, but with the revised modeling (and when using ADF&G’s recommended Gravina Island Deer Multiplier of 35) it was at 7.3 deer per square mile in 2006.

<sup>6</sup> Caouette, J.; Kramer, M.; & Nowacki, G. (2000). *Deconstructing the Timber Volume Paradigm in Management of the Tongass National Forest*. USDA Forest Service, Pacific Northwest Station. PNW-GTR-482. 20p. [http://tongass-fpadjust.net/Documents/Caouette\\_etc\\_2002000\\_GTR482.pdf](http://tongass-fpadjust.net/Documents/Caouette_etc_2002000_GTR482.pdf)

<sup>7</sup> HSI is habitat suitability index, the non-dimensional output of the model that was mentioned in a previous footnote.

<sup>8</sup> **Corrected by our RC13, submitted at the board meeting.**

Fig. 2: Unit-1A Deer Model Carrying Capacities by WAA, for 1997 vs. 2008 models Edwards (23Dec12, for BoG comments)

WAA Location	WAA Number	1997 Model		2008 Model		Model Comparison	If Deer Mult. = 45	Land Area (sq-mi)	Land Area (sq-mi)	1997 Model Area Weighted Capacity	2008 Model Area Weighted Capacity	1997 Model Carrying Capacity	2008 Model Carrying Capacity
		1997 Carrying Capacity	2006 Carrying Capacity	1995 Carrying Capacity	2006 Carrying Capacity								
Gravina	101	13	21	-38%	9.4	62.1	62	807	585	13.0	9.4	13.0	9.4
Duke I.	303	19	18	3%	-	73.3	73	1393	1348	19.0	18.4	19.0	18.4
Revilla, east shore	404	22	12	86%	-	281.4	6191	6191	3321	18.8	11.7	18.8	11.7
Revilla, Thorne Arm to Behm	405	24	18	34%	-	83.4	2002	2002	1495	18.3	13.6	18.3	13.6
Revilla, Carroll Inlet	406	20	12	64%	-	194.6	3892	3892	2374	3.0	3.8	8.0	4.5
Revilla, George Inlet	407	13	15	-12%	-	64.2	835	835	953	4.0	4.3	4.0	4.3
Revilla, Ketchikan	408	7	13	-46%	-	26.0	182	182	335	15.0	9.0	15.0	9.0
Revilla, Clover to Francis	509	17	14	25%	-	105.6	1795	1795	1431	10.0	8.5	10.0	8.5
Revilla, Traitors to Bell I.	510	17	10	79%	-	237.1	4031	4031	2252	12.4	8.9	12.4	8.9
Revilla, Burroughs Bay	511	15	5	195%	-	83.3	1250	1250	424	30.0	25.0	30.0	25.0
Cleveland, Spacious Bay	612	20	18	13%	-	107.9	2158	2158	1907	12.4	8.9	12.4	8.9
Cleveland, Helm Bay	613	24	19	29%	-	71.0	1704	1704	1321	3.0	3.8	8.0	4.5
Cleveland, Meyers Chuck	614	15	20	-24%	-	20.5	308	308	407	4.0	4.3	4.0	4.3
Cleveland, base	715	15	8	92%	-	158.7	2381	2381	1238	15.0	9.0	15.0	9.0
Unuk River	716	3	4	-21%	-	523.8	524	1571	1980	12.4	8.9	12.4	8.9
Chickamin & Walker Cove	717	8	4	79%	-	227.0	227	1816	1012	3.0	3.8	8.0	4.5
Rudyerd Bay	719	4	4	-8%	-	311.9	312	1248	1354	4.0	4.3	4.0	4.3
Smeaton Bay	821	15	9	67%	-	173.4	173	2601	1554	15.0	9.0	15.0	9.0
Boca de Quadra	822	10	8	18%	-	608.9	609	6089	5170	10.0	8.5	10.0	8.5
<b>Unit 1-A total</b>						<b>3,414</b>	<b>42,251</b>	<b>42,251</b>	<b>30,460</b>	<b>12.4</b>	<b>8.9</b>	<b>12.4</b>	<b>8.9</b>

**Overall deer carrying capacity over-estimations of the 1997 model:**

Unit-1A:	39%
Gravina Island:	38%
Revillagigedo Island:	60%
Cleveland Peninsula:	34%

Data Sources: 1997 model results from the 1997 TLMP FEIS, Table 3-112.  
2008 model results and WAA land areas are from 2008 TLMP planning record document 0935 (0935.xls).

Accordingly, after assessing the improved modeling results it is unsurprising that the harvest of deer and the amount of hunter effort in Unit-1A have declined and that deer numbers are low, particularly after recent hard winters.

It is important to note that not all of the difference between the modeling of the 1995 and 2006 current conditions is due to corrections to the model. In that 11-year interim, second growth timber in clearcuts over about 25 years old entered the stem exclusion stage, which dropped their contribution to carrying capacity to essentially zero. Furthermore, the future stem exclusion condition of other second growth which was less than 25 years old in 2006 (or not yet created by clearcutting) is not reflected in Fig. 2.

The point here is that the deer modeling basis for the current deer population and harvest objectives that were set by the Board of Game in 2000 is no longer valid. An urgently needed action by the Board is to update those objectives. It is not valid to initiate a program of wolf intensive management on the basis of the outdated objectives. Moreover, if the Board acts contrary to wolves because prey is under-abundant for both wolves and meeting deer harvest objectives, we believe that is an indicator that listing the Alexander Archipelago wolf under the Endangered Species Act is warranted.

<b>Attachment - 3</b>
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FINAL REPORT (RESEARCH)

State: Alaska

Cooperators: USDA Forest Service

Project No.: W-22-4      Project Title: Big Game Investigations  
W-22-5  
W-22-6              Job Title: Wolf-Deer-Habitat  
Relationships in  
Southeast Alaska

Job No.: 14.13R

Period Covered: 1 July 1984-30 June 1987

SUMMARY

Although originally scheduled to continue for 5 years, field work for this study was terminated after 2 years. Reasons for termination include limited progress on study objectives due to adverse weather; low densities of deer (Odocoileus hemionus sitkensis) and wolf (Canis lupus) populations; limited sightability of deer and wolves due to dense vegetation; budget shortfalls; and personnel reductions. Results presented here are based on relatively small sample sizes and should be considered preliminary.

The wolf population of Revillagigedo Island appears to be relatively stable, consisting of 35 to 50 wolves in 7 or 8 packs which occupy distinct territories. Additional single wolves or pairs that roam over several packs' territories may also occur. Although packs occasionally trespass on adjacent wolves' ranges, all such movements that were detected were relatively brief; at least 1 wolf was killed by other wolves while trespassing. One juvenile male dispersed from his natal pack and moved extensively before apparently establishing a bond with remnant members of another pack that had been reduced through hunting and trapping. Our data imply that vacant areas do not exist on the island and that food resources are limiting wolf numbers.

Although overall deer population densities are relatively low on Revillagigedo Island, wolves appear to be extremely efficient at locating areas where deer occur. While direct evidence of hunting patterns is limited, the distribution of relocations and results of scat analyses confirm that deer are the major food source for these wolves. Nevertheless, regional differences in diet occur on the island and other food sources such as beaver (Castor canadensis) and garbage are important for some packs. In addition, most wolves on the island appear to feed heavily on spawning salmon (Oncorhynchus spp.) in late summer and fall.

The availability of diverse food sources may enable wolves to sustain their numbers at higher levels than could be supported by deer alone. As a result, wolf predation on deer may, in turn, be increased. Nevertheless, any major reduction in deer numbers due to catastrophic winter conditions, or due to habitat alteration resulting from clear-cutting, could be expected to reduce wolf numbers or productivity.

Key words: Canis lupus, deer, food habits, habitat relationships, Odocoileus hemionus sitkensis, predator-prey, wolf.

## CONTENTS

Summary . . . . .	1
Background . . . . .	ii
Study Objective . . . . .	2
Job Objectives . . . . .	2
Study Area . . . . .	2
Methods . . . . .	2
Objective 1 - Size, Distribution, and Stability of Wolf Packs . . . . .	2
Objective 2 - Activity Areas, Hunting Patterns, and Deer-Kill Rates . . . . .	3
Objective 3 - Food Habits . . . . .	3
Results and Discussion . . . . .	4
Objective 1 - Size, Distribution, and Stability of Wolf Packs . . . . .	4
Town Pack . . . . .	4
Naha River Pack . . . . .	5
East Chuck Pack . . . . .	5
Carroll Inlet Pack . . . . .	6
Alava Bay Pack . . . . .	6
Lake Grace Pack . . . . .	7
Northeast Pack . . . . .	7
Objective 2 - Activity Areas, Hunting Patterns, and Deer-Kill Rates . . . . .	8
Objective 3 - Food Habits . . . . .	9
Conclusion . . . . .	12
Acknowledgments . . . . .	12
Literature Cited . . . . .	12
Figure . . . . .	15
Tables . . . . .	16

## BACKGROUND

This study was initiated as a long-term investigation of interactions between wolves (Canis lupus), deer (Odocoileus hemionus sitkensis), and habitat in coastal Alaska. Of particular concern was the effect of habitat alteration, through forest management, on the spatial relationships of deer and wolves, and the influence of wolf predation on deer numbers. A previous report completed under this study (Smith et al. 1986a) reviewed pertinent literature and identified the major needs for accomplishing the study objective. Concurrent work in the Petersburg area (Smith et al. 1986b, in press) also contributed to our understanding of relationships in this study.

Unfortunately, present levels of both wolf and deer populations are too low to facilitate efficient progress on several key jobs under this study. The nature of the vegetation and climate, combined with limited accessibility of

most of the study area, severely hampered attempts to capture wolves for telemetry and limited our ability to observe wolves or deer. Accordingly, it was decided to terminate this study at the end of the 2nd year.

#### STUDY OBJECTIVE

To determine the spatial and trophic relationships of wolves and deer in natural and altered habitats in Southeast Alaska.

#### JOB OBJECTIVES

1. To determine size, distribution, and stability of wolf packs.
2. To determine activity areas, hunting patterns, and deer-killing rates for specific packs.
3. To determine food habits of selected packs and of the overall wolf population.
4. To determine habitat composition of pack territories.<sup>1</sup>
5. To determine relative abundance of major prey species within selected pack territories.
6. To determine deer density relative to wolf pack territorial borders and habitat characteristics.
7. To monitor deer population trends in various habitat areas and wolf pack territories.

#### STUDY AREA

The study area consisted of Revillagigedo Island and the adjacent Cleveland Peninsula. Descriptions are provided in Smith et al. (1986a).

#### METHODS

##### Objective 1 - Size, Distribution, and Stability of Wolf Packs

Radiotelemetry was used to monitor wolf packs. Details of capture, handling, and monitoring techniques were presented in

<sup>1</sup> Due to the early termination of this project, no activities were undertaken on Objectives 4-7.



Sitka Field Office Box 6484 Sitka, Alaska 99835 907-747-7557

March 1, 2013

Alaska Board of Game  
c/o ADF&G, Boards Support Section  
by FAX: 907-465-6094

Subj: Comments on Proposals 178 and 178-A and the IM Operational Plan **for GMU 1A.**

Dear Board of Game members;

We request that you either disapprove Proposals 178 and 178-A for the reasons given herein or that you adopt the *substitute proposal* below. The proposals are for control of wolves on Gravina Island in Unit 1A for the purpose of deer intensive management. We incorporate by reference the comments on the feasibility assessments that we co-signed for the January Board of Game meeting (January PC-33 and January RC-13) as well as the testimonies by Larry Edwards, Paul Olson and Dave Beebe.

### **I. Our Recommendation and Request**

We recommend and request that the Board of Game strike the content of Proposals 178 and 178-A, and substitute and approve the following:

The Department of Fish & Game is directed to:

- (1) develop a program to establish a baseline of deer browse conditions on Gravina and Revillagigedo Islands and the Cleveland Peninsula, and a baseline of deer nutritional conditions in those areas, and to report the results to the Board; and
- (2) supply comments directly to the responsible federal or state agency, rather than through any other agency of state government, regarding proposed actions that may impair or benefit the State's game and wildlife resources or their habitat.

The Proposals and the Operational Plan do not comply with the *Board of Game Wolf Management Policy* (2011-185-BOG) or with ADF&G's 2011 *Intensive Management Protocol*. Also, the proposal is not cost effective and is likely to be generally ineffective. Reasons for these conclusions are explained below. Approving part (1) of the above substitute language will provide a way forward for understanding the deer-wolf-habitat situation in Unit-1A and particularly on Gravina Island.

Approving part (1) the substitute measure will still allow ADF&G to further develop its proposal for future consideration by the Board, would contribute to such an effort, and would also afford an opportunity for ADF&G to evaluate the alternative program we identify at the end of these comments.

Part (2) of the proposed substitute language is necessary to help ensure that the state's game, wildlife and habitat resources get the attention that they deserve from decisionmakers of development projects, toward avoiding significant impacts. Unit 1A, and Gravina Island in particular, are examples of how development decisions can cause significant game, wildlife and habitat losses that endure and affect people for decades. The relevant problem we identified in our comments and testimony for the January Board meeting is the State's "one-voice" policy. By this policy (as presently constructed), the comments of all state agencies are



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filtered through the Department of Natural Resources. We believe the governor has the authority to advocate whatever position he has on a particular issue or development; however, we also believe that all the facts and expert opinions need to be on the table for the public and a decisionmaker to see and evaluate. Allowing the selective filtering of such information for political reasons or through a Department of Natural Resources that has removed the word "conservation" from its mission statement is contrary to good government and the duties, under the state Constitution, of this Board and the Department. Because the problem the Proposal is addressing is one largely due to habitat loss, we believe it is important for the Board to take this step now toward minimizing future losses here and elsewhere in the state.

## II. Reasons Proposals 178 and 178-A Should Be Disapproved

The Board should disapprove the proposals because although the Board is required to consider wolf control, implementing such control is discretionary and:

### 1. Proposals 178 and 178-A are contrary to the Board of Game Wolf Management Policy (Findings 2011-185-BOG) (herein "Board Policy").

#### A. The Board Policy states:

**"Under no circumstances** will wolf populations be eliminated ..., and wolves **will always** be managed to provide for sustained yield."

(At 2, *emph. added*). The Unit-1A proposals would exterminate the Gravina Island wolf population, which clearly violates the policy. In addition the sustained yield of Gravina Island wolves would be terminated for an unknown period, also clearly violating the Policy. Instead, the removal of only as much as a "high percentage" of wolves is contemplated by the Policy. (*Id.*). The two proposals fail the policy.

#### B. The Board Policy also states:

**"Once prey population objectives have been met, wolf populations will generally be allowed to increase to or above pre-control levels."**

(*Id.*). It is however quite possible that on Gravina Island the result of the IM project will be that an increase of wolves to the pre-control level will be biologically precluded. This is because, with the Gravina deer population likely already at "K" (carrying capacity) because of foraging damage to browse and loss of habitat from past logging (Operational Plan at 4), the increase in deer population caused by removal of predation may result in further damage to browse plants and a trophic collapse of the Gravina Island ecosystem. Or as the Operational Plan put it, the result "could be disastrous in the long term." (*Id.*). This is precisely what we pointed out in our comments on the Feasibility Assessment. The Unit-1A Proposals are contrary to the Board Policy's expectation that the wolf population will recover, because there is substantial risk that on Gravina Island this will not occur. Further, this risk is a failure:

**"... to ensure** that wolf numbers remain sufficient to maintain long-term sustained yield harvests" of wolves.

(*Id.* at 3, *emph. added*).

**2. Proposals 178 and 178-A are contrary to ADF&G's "Intensive Management Protocol" of December 2011 because Principle 1 of the Protocol is violated.**

These Proposals and the Operational Plan for Unit-1A **all fail to "guard against"** the potential "disastrous long term" consequence of the IM project that the latter document identifies (see above). This violates the basis of Principle 1 of *the Protocol*:

"Management of natural systems **requires** guarding against unintended consequences."

(Protocol at 4). It is also contrary to the Protocol's guideline that:

"Managers should **ensure** ungulate and predator populations **and their habitats** will be managed for their long-term sustainability."

(Id.). Merely identifying the unintended consequence does not satisfy the Protocol; the Plan must "guard" against it, and really "should ensure" against it. Moreover, the subject consequence for Unit-1A is quite similar to the example given in the Principle 1's *Rationale*. It is that an overabundant ungulate population, caused by reducing predation to a low level, might "damage their forage base and dramatically decline due to a lack of food." (Id.). Overabundance is a matter that is relative to the carrying capacity, and in the case of Gravina Island there is strong evidence (Op. Plan at 4 regarding forage) that even though the deer population is low it is already overabundant and the browse is degraded. Reducing predation can only worsen this situation.

Proposal 178-A (the *Intensive Management Plan*) would suspend wolf control if the deer population doubles. (IM Plan at 3, Op. Plan at 13). But what is the likely consequence of doubling the deer population, given current knowledge of the state of the browse on Gravina? None of the documents explore that key question, nor any other question regarding the impact to browse. Although "forage condition" is mentioned as a factor in the Operational Plan's sections on *Evaluation Criteria* (Sec. III, at 11) and the *Decision Framework* (Sec. IV, at 13), in fact no vegetation criteria were set and no decision-triggering vegetation thresholds were set. What is said is only that there will be vegetation monitoring, and that is insufficient. The Operational Plan does spell out: (1) criteria and thresholds regarding browse condition; (2) the protocol for determining browse condition, whether criteria are met and whether thresholds are approached or exceeded; (3) who will do the monitoring or how it will be organized; and (4) what it will cost and how the cost is allocated in the project budget. In short, there is no "operational plan" regarding the crucial element of browse condition.

**3. The Decision Frameworks in the Operational Plans for Proposals 178, 179, 178-A and 179-A violate Principle 4 of ADF&G's "Intensive Management Protocol" of December 2011.**

The Decision Framework for an IM program is expected to be "transparent" and "explicit." (Protocol at 6, title of Principle 4), but several elements of the Decision Framework (Sec. IV) of the Operational Plan are neither.

i. The Op. Plan's threshold a) for Deer Abundance *is operative only at the end of the program, i.e. "after 5 years"*. (At 13, part of Decision Framework). The Op. Plan is not transparent or explicit about what action will or should occur if this threshold for deer abundance is achieved in mid-program, nor does it discuss the possibility of such occurrence at all. This threshold is the attainment of a doubling of deer population according to at least two of four specified indicators. Figure 1 of the Op. Plan shows that one indicator of deer abundance has recently had two years of consistent increase in the absence of wolf control. Therefore it seems possible that the population may be able double in less than five years, even in the absence of wolf control.

ii. Thresholds a) and c) concern attaining a doubling of the Gravina Island deer population. (Id.). They are not “transparent” and “explicit” about either the estimated quantity of deer that will be the basis of estimating a doubling of abundance or what number of deer will be considered to constitute a doubling. (Id.). Ultimately, however, what matters are: 1) the resulting number of deer; 2) how that number relates to winter carrying capacity; and 3) how (as the Feasibility Assessment stated) that number relates to hunter demand and (more reasonably set, we contend) deer population and harvest objectives.

iii. Collectively, the four thresholds do not cover the possible outcome that the program might successfully exterminate wolves on deer population does not double (e.g. perhaps due to severe winters). In this case threshold c) is controlling, but it contemplates only “find[ing] ways to improve the trapping program,” which is nonsensical if wolves have been extirpated.

iv. Deer Abundance thresholds a) through c) are contrary to the intent of the Unit-1A wolf control program as it was presented to the public and the Board in the October 2012 Feasibility Assessment. That intent was for a five year wolf control program. These thresholds instead set up an administrative decision whether or not to suspend the control program at the end of the five years. Thus, the Department is reserving to itself the decision on extending the program, instead of making a formal proposal to the Board to do so. These thresholds are therefore improper.

Instead, the thresholds should be written to collectively provide a “decision framework” to provide a means to suspend the program early if the goal of prey doubling is attained early.

v. The content of threshold d) regarding “vegetation plots” is by no means a threshold, but rather expresses only an intent to conduct monitoring to gain insight into the deer/habitat relationship on Gravina Island. (Id.). This content belongs somewhere else in the Op. Plan, and moreover it needs to be expanded to transparently and explicitly explain the protocol that will be used for the monitoring, the metrics that will be used and how the information will be evaluated toward gaining insights.

However, the Decision Framework does need to have an effective vegetative threshold for determining whether the control program should be suspended before its termination date. It is shocking that this crucial element is missing from deer abundance thresholds, because the Op. Plan itself has pointed out that the wolf control program could result in further degradation of already degraded browse on Gravina Island, and could “be disastrous in the long term” as a result. (Op. Plan at 4). Monitoring is not a “decision framework,” although it is a necessary element of such a framework. The Operational Plan needs to specify a “transparent and explicit” mechanism for ensuring appropriate action if the wolf control program further impairs deer habitat quality. Moreover, an adequate baseline needs to be established before wolf control begins, and the time and means to establish the baseline has not been provided for in the Operational Plan.

vi. The *Prey Harvest* element of the Operational Plan’s *Prey Harvest Strategy* (another element of the Decision Framework) has a non-transparent, non-explicit expectation for “a 20-25% annual increase in deer numbers” if the IM program is successful. (Op. Plan at 14). The problem here is that this does not disclose any real numbers (i.e. population for Gravina Island), and the compounding interest is most likely unrealistic given current knowledge of the degraded state of the browse on the island. A 20% compounding of population over five years is a tripling of population. A 25% compounding is nearly a quadrupling. Can the crucial winter browse on the island, given the loss of this habitat to logging both recently and over recent decades, tolerate these increases in deer population without triggering the possible “disastrous long term” consequences Op. Plan’s Background section discloses? (See at 4). Bear in mind that the habitat impacts much of the past logging are not yet fully realized, since canopy closure of the second growth takes 25 to 40 years. The Operational

Plan violates *the Protocol's* Principle 4 because it is not transparent, not explicit – and irrationally it does not establish a “prey harvest strategy” that is related to the obviously limited capability of Gravina’s habitat.

vii. The *Prey Nutritional Index* element of the Operational Plan’s *Prey Harvest Strategy* (another element of the Decision Framework) discusses an “objective” of monitoring deer body condition. (Op. Plan at 14-15). However, this subsection does not establish a decisionmaking framework for what range of actions the program will take based on the range of body condition results that may be obtained from the monitoring. This is related in part to the vegetative condition issue as discussed in item v., above, and much of the thrust of that argument applies here as well, including a need to a baseline before wolf control begins.

#### 4. Proposals 178 and 178-A are not feasible due high cost and likely ineffectiveness.

The Operational Plan claims that a “cost efficient predator control strategy” will be used. (Op. Plan at 4). However, as we pointed out in our comments and testimony for the January Board of Game meeting, the program for Gravina Island is anything but cost efficient. In our comments (January PC33 at 11) we estimated that the elimination of the wolves on Gravina Island may result in “a population increase of 208 [deer that may] result in a harvest increase of only 9 deer. The cost per additional deer that can be expected to be harvested would exceed the range of \$43,900 to \$52,200, each.”

The Board of Game has delayed consideration of the cost of the Unit-1A proposal until the March meeting. ADF&G has not provided any further cost discussions in the materials it has provided for the March meeting, nor has it contested our cost figures. Even as an experiment, we do not believe the cost of the proposals can be justified.

Moreover, the Board considered material from ADF&G in 2000, when deliberating on deer population and harvest objectives, which supports our contention that wolf control in Southeast Alaska is overly expensive (not “cost efficient”) and likely to be ineffective:

With the notable exception of ensuring maintenance of existing old-growth forests, **little can be done to increase deer densities in Southeast Alaska.**

Wolf control efforts in the 1980s in Southeast Alaska **were found. to be expensive, time consumptive, and ineffective.**

(*Intensive Management Population Identification Worksheet*, at 2, 8 and 10, *emph. added*. Provided as Attachment-1).<sup>1</sup> From October to the present, ADF&G has not presented any documents to the public or the board that discuss these findings from the 1980s and the importance that was placed on them for the Board of Game’s 2000 deliberations. In the absence of a whole record for public and the Board to consider, Proposals 178 and 178-A should be disapproved because it is apparently likely that the wolf control program will be inordinately expensive (as we already know) and ineffective.

Moreover, scarce funds in a smaller amount should instead be spent at this time for developing the baselines that we flagged above as needed, for browse quality and deer nutritional index. If any wolf control actions are taken here, they need to be based on good baselines and a solid understanding of condition of the habitat and the deer that use it – at present we have neither for Gravina Island or the proposed control area.

<sup>1</sup> This document was obtained through a February 2013 request to Board staff for deer-related materials that were considered by the Board in 2000.

We recommend that the Board strike the content of Proposals 178 and 178-A and substitute language directing ADF&G to develop the two baselines and report to the Board on: (1) the conditions of deer habitat, (2) the nutritional condition of the deer population on Gravina Island particularly and more broadly in Unit-1A, and (3) more particulars of the findings of the 1980s wolf control efforts. There is no emergency dictating immediate initiation of a wolf control program on the island or in Unit-1A, and a methodical scientific approach should be taken instead.

**5. The deer population and harvest objectives were set much too high because of: (1) faulty modeling the objectives were based on, and (2) unusually high harvest in immediately preceding years.**

As discussed in our comments and testimony for the January Board of Game meeting, the deer population and harvest objectives were set much too high by the Board in 2000. (Pages 2-5 of comments January PC33, and corrected table in January RC13, included here, as corrected in January, as Attachment-2).

As shown in the box at the bottom of Figure 2 in Attachment-2, the winter deer habitat modeling ADF&G relied upon when advising the Board in 2000 on setting deer objectives for Unit-1A gave results now known to have greatly over-estimated carrying capacity. The over-estimation for 39% for all of Unit-1A and 38% for Gravina Island. Other places important for Ketchikan hunters were also over-estimated, by 60% for Revillagigedo Island and 34% for the Cleveland Peninsula.

Because Proposals 178 and 178-A are largely driven by an impetus to meet the 2000 objectives, the only way the Board could rationally approve the Proposals would be to first reconsider the objectives through a formal process.

Two other related factors militate for disapproving the Proposals at this time. The 2000 objectives were based on harvests from several years earlier when harvests were at a peak, in a period of generally mild winters. (See Feasibility Assessment; see also Op. Plan Fig. 1). Following the closure of the Ketchikan Pulp Mill in 1997, the demographics of the area changed and the number of hunters and hunter effort decreased. From two years later, in 1999, hunter effort was fairly consistent until the hard winters of 2006/2007 and 2008/2009. (Fig. 1, noting that 1991 and 2005 are outliers). Despite the two hard winters, deer harvest began recovering in 2009 and 2010.

Also, low deer numbers should currently be expected in Unit-1A a due to the combined effects of (1) marginal to low carrying capacities naturally; (2) lower carrying capacities now due to winter habitat loss to logging; and (3) the recent hard winters. Notably, except for Duke Island, all portions of Unit-1A are markedly below the 18 deer/sq-mile threshold developed by ADF&G scientists (with others) which is a minimum for providing both for viable wolf populations and the needs of hunters.

Under the *Board of Game Wolf Management Policy* (2011-185-BOG), the paucity of suitable winter habitat creates a situation where wolf control is not a suitable solution to low deer harvest. Given the circumstances, we believe a likely outcome of a board approval of wolf control in Unit-1A is likely to be assurance of an ESA listing of the Alexander Archipelago wolf under the petition that is pending with the US Fish & Wildlife Service.

**6. An alternative to wolf extermination should be considered.**

The Unit-1A Operational Plan cites Smith (1983), which was not included in the References section. Noting this, we obtained a Smith document from ADF&G, which turned out to be Smith et al. (1987), *Final Report (Research): Wolf-Deer-Habitat Relationships in Southeast Alaska*. (Included as Attachment-3). The study was of radio-collared wolves on Revillagigedo Island, and tracked five packs for two years. The study was terminated three

years early because of adverse weather, low densities of deer and wolf populations, budget shortfalls and personnel reductions.

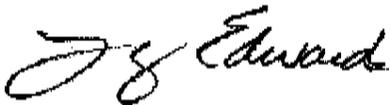
An interesting aspect of the study is the Town Pack, which had a remarkably lower fawn composition in the diet (11.9%, versus the next-best 37.1% and the highest 60.6%). The percentage of adult deer in the diet was the second lowest (versus a pack that preyed heavily on beaver and had the highest non-deer diet component). Interestingly, the Town Pack's diet was 39% garbage from the Ketchikan landfill.

This suggests that an alternative way to reduce the deer and fawn components of the diet of Gravina wolves may be, as an experiment, to regularly provide food scraps at various points along or near remote parts of the Gravina road system. These partial dietary substitutions should be placed where wolves will encounter them and away from areas being frequented by deer, and should be planned so wolves will have a degree of expectation among several particular places. Of course concerns would include habituation and public safety; however, the Town Pack apparently used the Ketchikan dump for years, and some accessible portions of Gravina Island are more remote than that. It may have value at least as an experiment apart from its potential as a long-term solution.

A scraps collection program with restaurants or citizens, for deposit or collection on particular days, could provide the feed. The program could have an educational component for students and the public at large, and perhaps could have a tourism aspect through viewing stations near enough to the various feeding sites for spotting scopes.

While outside-the-box, this alternative may help boost deer recovery and harvest numbers, and might possibly be able to continue at potentially little cost to the state, for decades to come. One advantage over Proposals 178 and 178-A is that the wolf population would remain in place, so if the increasing deer population does end up further decreasing browse (winter browse especially) and predation is needed to control it, ending or reducing the feeding is a ready solution.

Sincerely,



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## Attachment - 1

### Intensive Management Population Identification Worksheet

Species: Deer

Population: Unit 1A

**Brief description of the population:**

This deer population inhabits the mainland and near-shore islands in Unit 1A. Densities have generally been highest on the lower Cleveland Peninsula and Gravina Island. Densities are lowest on the mainland east of Ketchikan where very limited deer hunting occurs. Buck-only harvests, with a 4-buck limit, have been in effect in the unit for the past 20 years.

**Criterion #1 – Harvest:**

- a. Maximum average harvest for any 3 consecutive years: 788 during 1994–1996.
- b. Estimated average harvest for 1991–1996: 652

**Criterion #2: - Accessibility:**

Most access is by boat, some by floatplane. Highway vehicles are used to access areas on the limited Ketchikan road system, and 3- and 4-wheelers are used occasionally to access areas associated with remote logging roads. Boat and airplane access is extremely weather-dependent.

**Criterion #3: – Use for meat:**

Alaska residents, primarily those residing within the Ketchikan Gateway Borough, use this population of deer primarily for meat and recreation.

**Criterion #4 – Hunter demand:**

- a. Estimated or reported hunter effort: During 1991–1995, hunters spent a seasonal average of 4,534 days hunting deer. Effort data was not collected during 1996.
- b. Number of applicants for permit hunts, if applicable: NA
- c. Other indicators of demand: None

**Is this population important for providing high levels of human consumptive use?**

Department Recommendation:

Yes:   X  

No: \_\_\_\_\_

Board of Game Action:

Yes:   X  

No: \_\_\_\_\_



## Intensive Management Objective Worksheet

Species: Deer

Population: Unit 1A

- (1) **Effects of weather, habitat capability, diseases and parasites:** Diseases and parasites appear to have negligible impact on deer populations in Unit 1A. Severe winter weather causes periodic declines in the deer population, especially in areas where clear-cut logging has removed old-growth forests. Among other deleterious effects, the removal of the old-growth canopy allows snow accumulation on the ground above "normal" levels, limiting the value of critical habitat to support over-wintering deer populations.
- (2) **Maintenance of viable predator populations:** Brown bear predation on deer is apparently negligible. We believe that black bear predation on deer is significant where they occur at high densities. Anecdotal evidence supports the idea that scavenging of deer carcasses by brown bears, marten, and bald eagles may provide periodic food resources, but is probably not important for maintaining these populations. Deer are the mainstay of the diet of wolves in this unit.
- (3) **Maintenance of habitat conditions suitable for other species in the area:** Evidence suggests that deer and mountain goats may compete for limited food resources in some limited situations. However, for current deer and goat population levels in Unit 1A, there appears to be no direct correlation in terms of population densities.
- (4) **Effects on subsistence users:** The islands and the Cleveland Peninsula portion of Unit 1A are in the Ketchikan Nonsubsistence Area, and make up most of the quality deer habitat in the Unit. Subsistence use of deer in Unit 1A depends largely on deer abundance. As deer numbers increase following mild winters, hunter effort increases proportionately. Deer meat provides a considerable amount of the red meat for consumption by Unit 1A residents, as the only other available ungulates are mountain goats (common) and moose (scarce).
- (5) **Cost, feasibility, and potential effectiveness of possible management actions:** With the notable exception of ensuring maintenance of existing old-growth forests, little can be done to increase deer densities in Southeast Alaska. The ADF&G needs to continue working with the US Forest Service and private landowners in an effort to maintain quality habitat. Where logging occurs it is imperative that proliferating human access be minimized by strict attention to road placement, administrative and/or mechanical road closures after logging, and regulations that ensure viable deer populations.
- (6) **Land ownership patterns within the range of the population:** The vast majority of deer habitat in Unit 1A is under federal jurisdiction of the Tongass National Forest. In addition, a portion of the mainland is designated as the Misty Fjords National Monument within the Tongass.

- (7) **Degree of accessibility to harvest:** Accessibility by boat is very good throughout the area. The only areas largely inaccessible are parts of the mainland away from the coast, where deer habitat is limited because of high elevations and snow and ice cover.
- (8) **Other factors, if any:** Since 1990, both state and federal subsistence hunting regulations have been in effect. State regulations were adopted by the Alaska Board of Game and applied to all lands in Unit 1A. State and federal deer hunting regulations remain identical in the Unit.

**Department Recommended Objectives:**

Population	<u>14781</u>	^
Harvest	<u>725</u>	

Current management objectives for Unit 1A deer are to: 1) maintain a population in excess of 45 deer per mi<sup>2</sup> of winter range (1.4 pellet-groups per plot); and 2) monitor deer densities using pellet-group surveys.

**Board Action:**

Objectives:

1. Population: 15000
2. Harvest: 700

## Intensive Management Population Identification Worksheet

Species: Deer

Name of the Population: Unit 1C

**Brief description of the population:**

Deer are found throughout Unit 1C, but the highest concentrations are found on three islands Douglas, Shelter, and Lincoln. Deer are also found on the mainland in very low densities due to a greater snowpack and the presence of wolves.

**Criterion #1 - Harvest:**

- a. Maximum average harvest for any 3 consecutive years: 583
- b. Estimated average harvest for 1991-1997: 467

**Criterion #2 - Accessibility:**

Portions of the Unit 1C mainland and Douglas Island are accessible by highway vehicle. Hunters also use boats to access the south and western sides of Douglas Island, as well as Shelter and Lincoln Islands.

**Criterion #3 - Use for meat:**

Considering the limited opportunities available for harvesting moose in Unit 1C, most hunters secure wild meat through the harvest of local deer. Deer hunting is also an important recreational activity for Juneau area residents.

**Criterion #4 - Hunter Demand:**

- a. Estimated or reported hunter effort: From 1991-1995 the average number of hunters/year was 939, and these hunters combined for 3,324 hunter days. 1996 and 1997 data is only available for successful hunters, and therefore not included in the above average.
- b. Number of applicants for permit hunts, if applicable: NA
- c. Other indicators of demand: The deer hunter survey indicates hunters pursue deer throughout the 3-½ month season in Unit 1C.

**Is this population important for providing high levels of human consumptive use?**

Department Recommendation:

Yes:   X  

No:

Board of Game Action:

Yes:   X  

No:

## Intensive Management Objective Worksheet

Species: Deer

Population: Unit 1C

- (1) **Effects of weather, habitat capability, diseases and parasites:** Winter weather, especially deep and persistent snow, is a critical factor in regulating deer numbers. Deep snow hinders foraging ability of deer by limiting mobility, increasing energy expenditure, and by concentrating deer at lower elevations which increases intraspecific competition. Altitude, aspect, and browse species availability can severely limit habitat quality and quantity, and high deer densities result in starvation or increased susceptibility to predation caused by the poor nutritional state of the animals (Olson, 1979). Unit 1C has both mainland and island deer habitat. Douglas, Lincoln, and Shelter islands harbor higher deer densities than the mainland because of lower snowfall, mostly undisturbed forest habitat, and lack of wolves. These easily accessible islands support most of the deer hunting effort within the subunit. The capability of the habitat to support deer in Southeast Alaska is dependent on the amount of mature forest available. Diseases and parasites do not appear to be factors limiting deer populations in Southeast Alaska.
- (2) **Maintenance of viable predator populations:** Mainland deer densities are low enough that wolves rely upon a wide array of prey to subsist, and wolves in this area are not highly dependent on deer. On the islands within the subunit, wolves are virtually absent. We believe that black bear predation on deer is significant where bears occur in high densities. Anecdotal evidence supports the idea that scavenging of deer carcasses by marten and bald eagles may provide periodic food resources, but is probably not important for maintaining these populations. Changes in human harvest objectives would most likely occur on the islands, where changes in deer numbers would not have a substantial effect on predators.
- (3) **Maintenance of habitat conditions suitable for other species in the area:** Long term planning to maintain large tracts of mature forest is the only way of sustaining a viable deer population. Other species that use mature forests would benefit by having habitat available to them. Deer and mountain goats compete for limited food resources in some limited situations. However, for current deer and goat population levels in Unit 1C, there appears to be no direct correlation in terms of population densities.
- (4) **Effects on subsistence users:** Subsistence use of deer in Unit 1C depends largely on deer abundance. As deer numbers increase following mild winters, hunter effort and success increases proportionately. Deer meat provides most wild red meat for consumption by Unit 1C residents, with moose and mountain goats supplementing deer meat.
- (5) **Cost, feasibility and potential effectiveness of possible management actions:** We believe that predation is not a substantial problem for deer in this subunit, and attempts at predator control would be extremely costly. Mainland snowfall is heavy enough that even in the absence of predators it is unlikely that deer numbers will ever increase substantially. It is not



## Intensive Management Population Identification Worksheet

Species: Deer

Population: Unit 2

**Brief description of the population:**

This deer population inhabits Prince of Wales and adjacent islands. Densities have fluctuated historically, primarily in response to winter weather conditions, although predation by wolves and black bears contributes to annual mortality. Deer are known to travel between islands, as are their predators.

**Criterion #1 – Harvest:**

- a. Maximum average harvest for any 3 consecutive years: 2,970 during 1993–1995.
- b. Estimated average harvest for 1991–1996: 2,831

**Criterion #2: - Accessibility:**

Most hunters access deer with highway and off-road vehicles on the extensive road system found on central to northern POW Island. A few hunters access alpine lakes early in the season with floatplanes, and some travel to small offshore islands by boat.

**Criterion #3: – Use for meat:**

Primarily Alaska residents residing on Prince of Wales Island use this deer population for meat and recreation. Several Ketchikan residents travel to Unit 2 each season to hunt deer for meat and recreation as well.

**Criterion #4 – Hunter demand:**

- a. Estimated or reported hunter effort: During 1991 –1995, hunters spent a seasonal average of 12,242 days hunting deer in Unit 2. Effort data was not collected during 1996.
- b. Number of applicants for permit hunts, if applicable: NA
- c. Other indicators of demand: None

**Is this population important for providing high levels of human consumptive use?**

Department Recommendation:

Yes:   X  

No:

Board of Game Action:

Yes:   X  

No:

## Intensive Management Objective Worksheet

**Species:** Deer

**Population:** Unit 2

- (1) **Effects of weather, habitat capability, diseases and parasites:** Diseases and parasites appear to have negligible impact on deer populations in Unit 2. Severe winter weather causes periodic declines in the deer population, especially in areas where clear-cut logging has removed old-growth forests. Among other deleterious effects, the removal of the old-growth canopy allows snow accumulation on the ground above "normal" levels, limiting the value of critical habitat to support over-wintering deer populations. Prince of Wales Island has seen some of the more aggressive logging in Southeast Alaska, and within the next 20–30 years we anticipate deer habitat capacity to decrease substantially.
- (2) **Maintenance of viable predator populations:** Wolf populations are healthy in Unit 2 and can effect deer populations at least in local areas. We believe that black bear predation on deer is significant where bears occur in high densities. Anecdotal evidence supports the idea that scavenging of deer carcasses by marten and bald eagles may provide periodic food resources, but is probably not important for maintaining these populations. Deer are the mainstay of the diet of wolves in this unit.
- (3) **Maintenance of habitat conditions suitable for other species in the area:** There are no other ungulate populations in Unit 2 that deer compete with, although marten exist in the unit and have been shown to be old-growth dependent.
- (4) **Effects on subsistence users:** Subsistence use of deer in Unit 2 depends largely on deer abundance. As deer numbers increase following mild winters, hunter effort increases proportionately. Deer meat provides a large proportion of the red meat for consumption by Unit 2 residents, although there is significant use of seals and some amount of use of black bears.
- (5) **Cost, feasibility, and potential effectiveness of possible management actions:** With the notable exception of ensuring maintenance of existing old-growth forests, little can be done to increase deer densities in Southeast Alaska. The ADF&G needs to continue working with the US Forest Service and private landowners in an effort to maintain quality habitat. Where logging occurs it is imperative that proliferating human access be minimized by strict attention to road placement, administrative and/or mechanical road closures after logging, and regulations that ensure viable deer populations. Wolf control efforts in the 1980s in Southeast Alaska were found to be expensive, time consumptive, and ineffective.
- (6) **Land ownership patterns within the range of the population:** Most of the deer habitat in Unit 2 is under federal jurisdiction of the Tongass National Forest, although private corporations own a considerable amount of land in this Unit.



(7) **Degree of accessibility to harvest:** Accessibility by boat and highway vehicles is very good throughout most of the area. Off road vehicle use is increasing by deer hunters.

(8) **Other factors, if any:** Since 1990 both state and federal subsistence hunting regulations have been in effect. State regulations were adopted by the Alaska Board of Game and applied to all lands in Unit 2. In recent years there has been a federal doe season in Unit 2 that is only open to federally qualified subsistence hunters (rural residents of Units 1A, 2, and 3).

**Department Recommended Objectives:**

Population	<u>71248</u>
Harvest	<u>2728</u>

Current management objectives for Unit 2 deer are to: 1) maintain a population in excess of 45 deer per mi<sup>2</sup> of winter range (1.4 pellet-groups per plot); and 2) monitor deer densities using pellet-group surveys.

**Board Action:**

Objectives:

1. Population: 71,000
2. Harvest: 2,700

## Intensive Management Objective Worksheet

Species: Deer

Population: Unit 3

- (1) **Effects of weather, habitat capability, diseases and parasites:** Diseases and parasites appear to have negligible impact on deer populations in Unit 3. Severe winter weather causes periodic declines in the deer population, especially in areas where clear-cut logging has removed old-growth forests. Among other deleterious effects, the removal of the old-growth canopy allows snow accumulation on the ground above "normal" levels, limiting the value of critical habitat to support over-wintering deer populations.
- (2) **Maintenance of viable predator populations:** Wolf populations are healthy in Unit 3 and can effect deer populations at least in local areas. We believe that black bear predation on deer is significant where bears occur in high densities. Anecdotal evidence supports the idea that scavenging of deer carcasses by marten and bald eagles may provide periodic food resources, but is probably not important for maintaining these populations. Deer are the mainstay of the diet of wolves in this unit.
- (3) **Maintenance of habitat conditions suitable for other species in the area:** Evidence suggests that deer, moose, and elk may compete for limited food resources in some situations. However, for current deer, moose, and elk population levels in Unit 3, there appears to be no direct correlation in terms of population densities.
- (4) **Effects on subsistence users:** Subsistence use of deer in Unit 3 depends largely on deer abundance. As deer numbers increase following mild winters, hunter effort increases proportionately. Deer meat provides a large proportion of the red meat for consumption by Unit 3 residents, although there is significant use of moose and black bears.
- (5) **Cost, feasibility, and potential effectiveness of possible management actions:** Protecting old-growth forests and treating second growth clear cuts can maintain existing deer densities in Southeast Alaska. The ADF&G needs to continue working with the US Forest Service and private landowners in an effort to maintain quality habitat. Where logging occurs it is imperative that proliferating human access be minimized by strict attention to road placement, administrative and/or mechanical road closures after logging, and regulations that ensure viable deer populations. Wolf control efforts in the 1980s in Southeast Alaska were found to be expensive, time consumptive, and ineffective.
- (6) **Land ownership patterns within the range of the population:** Most deer habitat in Unit 3 is under federal jurisdiction of the Tongass National Forest, although a private corporation owns a large section of north Kupreanof Island.



- (7) **Degree of accessibility to harvest:** Accessibility by boat is good throughout most of the area. Highway vehicle access is good on islands with communities.
- (8) **Other factors, if any:** Since 1990 both state and federal subsistence hunting regulations have been in effect. State regulations were adopted by the Alaska Board of Game and applied to all lands in Unit 3. State and federal deer hunting regulations remain identical in Unit 3.

**Department Recommended Objectives:**

Population	<u>14868</u>
Harvest	<u>852</u>

Current management objectives for Unit 3 deer are to: Increase populations on deer winter range (<1,500 ft elevation) to 32 deer/mi<sup>2</sup>, measured by a mean pellet density of 1.0 pellet group/20m<sup>2</sup> plot.

**Board Action:**

Objectives:

- 1. Population: 15,000
- 2. Harvest: 900

C  
7-0

**Attachment - 2**

**Excerpt of comments  
PC33, as corrected by  
RC13, from the Jan.  
Board of Game meeting**

- **Greater SE Alaska Conservation Community • Alaska Wildlife Alliance •**
- **Tongass Conservation Society • Greenpeace • Center for Biological Diversity •**

Alaska Board of Game  
 c/o ADF&G, Boards Support Section  
 by FAX: 907-465-4094

December 28, 2012

Subj: **Unit 1A:** Comments on "Feasibility Assessment ... Black-tailed deer"

...

**II. The Deer Objectives Are Outdated and Therefore Do Not Support Wolf IM.**

The current objectives for deer population and deer harvest in Unit-1A are outdated because they are based on older deer modeling which produced over-estimates of the carrying capacity of winter habitat.

**A. The current deer objectives for Unit 1-A, and how they were determined.**

The current deer population and harvest objectives for Unit-1A were adopted by the Board of Game in 2000, setting them at 15,000 and 700 respectively. (Assessment at 7). They are based in large part on the Forest Service's 1997 deer model, which was used to estimate the winter carrying capacity of the habitat for deer, and on harvest rates from 1994 to 1999 which were the peak years for the Unit. (Id.). The Assessment itself recognizes that these objectives are "unrealistically high." (Assessment at 7, 18). Over the past five years the Unit-1A deer harvest ranged from 154 to 309 (Assessment at 7), but this does not include illegal take which the department estimates to be around 50% of the harvest estimated from hunter surveys. (Assessment at 30, 36). Thus, the actual total harvest over the past five years likely ranged from about 230 to 460, in comparison to the 700. This approaches two-thirds of the objective.

**B. Problems with the deer model results that the harvest objective was based upon.**

The Board of Game, in its 2000 determination of Unit-1A deer population and harvest objectives, relied upon deer carrying capacity data from the Forest Service's 1997 deer model. (Assessment at 7, 18). The Forest Service updated its model for the 2008 Tongass Forest Plan, and the new model<sup>1</sup> makes significantly lower carrying capacity estimates.

<sup>1</sup> When we speak here of a "version" of the model, this encompasses the core of the model and the vegetative data and directives for some external settings that are used when carrying capacity in deer

Three corrections made to the model since 2000 were substantial:

(1) In its FY-2000 Monitoring & Evaluation Report (published April 2001),<sup>2</sup> the Forest Service corrected the conversion factor (called the Deer Multiplier) used to change the model's non-dimensional output to carrying capacity in deer per square mile, from 125 to 100.<sup>3</sup> The Deer Multiplier is based on deer pellet transect data, and is the carrying capacity of best quality habitat (of which very little exists). The older model results in over-estimated carrying capacity by 25%. From the information in the Assessment we don't know which multiplier had been used when the Board of Game set the Unit-1A objectives.

However; regarding the Deer Multiplier, Gravina Island is a special case as ADF&G itself explained to the Forest Service in 2002 regarding the Gravina Island Timber Sale Project:<sup>4</sup>

**"Deer model.** Our concerns for sustainability of deer harvests on Gravina stem in part from the reported results of runs of the deer model for the DEIS, as well as analysis of hunter demand. The coefficients used for these runs very likely underestimate the effects of the project upon deer, leading to overly optimistic projections of true deer numbers and future availability. The model was run with a multiplier of 125 deer per square mile, as directed by the 1997 Forest Plan, although a multiplier of 100 deer per square mile has been recommended by both FS and ADF&G biologists.

In the September 13 meeting, Gene DeGayner indicated that the FS intends to use a multiplier of 100 deer per square mile for habitat scores of 1.0 from this point forward, unless project-level data suggest otherwise. In general, ADF&G recommends assuming a maximum **year-round** carrying capacity of 35 to 40 deer per square mile in the best habitat. After consultation with ADF&G research biologists Matt Kirchhoff and Dave Person, **we recommend equating a multiplier of 35 deer per square mile to a score of 1.0 for the Gravina project area**, due to the lack of high-value alpine habitat, indicating a non-migratory deer population that occupies the area all year, with little seasonal variation. (See the Appendix for a more detailed discussion of application of the deer model.)"

(ADF&G Habitat Div. letter to Alaska OMB, 12 Dec. 2002, at 3 to 4. Orig. emph.). Thus, for Gravina Island, reliance on Deer Multipliers of 125 or 100 would result in over-estimations of carrying capacity of a factor of 3.57 (a 257% over-estimation) or 2.85 (a 185% over-estimation).

(2) In 2008 the Forest Service made a further correction to use of the Deer Multiplier.<sup>5</sup> From 1997 through 2007 the scale for the non-dimensional habitat value outputs was a range "habitat suitability index (HSI)" of from zero to 1.3. The value 1.3 represents best

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per square mile is calculated from the model's non-dimensional output. The core of the model has not changed over the years, only the other factors in its application.

<sup>2</sup> USFS R10-MB-431, at 2-155.

<sup>3</sup> The multiplier represents the winter carrying capacity of the highest quality habitat type; however, this kind of habitat is scarce.

<sup>4</sup> This timber sale project was not executed. As a result of an administrative appeal of the project decision (Greenpeace et al. 2004) to the next highest level of the Forest Service, the project decision was withdrawn. However, since that time a significant amount of logging in high quality deer habitat has occurred on Gravina Island, done under timber sales by Alaska DNR and the Alaska Mental Health Trust.

<sup>5</sup> 2008 *Tongass Forest Plan (TLMP) FEIS*, at 3-266: "HSI values were standardized to range from 0 to 1.0, by dividing all values by 1.3, because outputs from such models represent a range from 0 to 100 percent habitat suitability, with higher values indicating higher habitat capability." Also at 3-284 in footnote 2: "Habitat capability in terms of deer density calculated using a multiplier of 100 deer per square mile equating to a habitat suitability index score of 1.0."

quality habitat. However, the way the Deer Multiplier was used during those years, it corresponded to a value of 1.0 in that range, which is incorrect and results in a 30% over-estimation of carrying capacity. If these and the previous error were both present in the data the Board considered in setting the objectives, the total error was a 62.5% carrying capacity over-estimation.

(3) The vegetative dataset used in the 1997 deer model was later found by a Forest Service statistical study to be uncorrelated to habitat quality. (Caouette et al. 2000).<sup>6</sup> An adequate dataset was not used until adoption of the 2008 Tongass Forest Plan. The new dataset “results in an overall reduction in average HSI<sup>7</sup> values because fewer stands would be classified as high and medium volume strata and more stands would be classified as low volume strata compared to the old volume strata mapping used in the 1997 Forest Plan Revision Final EIS.” (2008 Forest Plan FEIS at 3-265 to 266). This change resulted in significantly lower carrying capacity estimates by the new model, nearly everywhere in the Tongass, but the changes were not the same everywhere because the previous dataset’s non-correlation to habitat quality had made the amount of error erratic.

### C. The Amount of Deer Modeling Error, As Incorporated in the Unit-1A Objectives.

The 2008 corrections made by the Forest Service to its 1997 modeling of deer winter habitat carrying capacity indicate that the 1997 modeling made these over-estimations:

**Fig. 1: Over-estimations of the earlier model.**

Unit 1-A	39%	Over-estimation
Gravina Island	38% <sup>8</sup>	Over-estimation
Revillagigedo Island	60%	Over-estimation
Cleveland Peninsula	34%	Over-estimation

(See calculations in Fig. 2, next page.) But percentages don’t tell the whole story. The Tongass Forest Plan has a standard and guideline of providing a deer habitat carrying capacity of at least 18 deer per square mile (where possible), in order to sustain both wolves and deer hunters. ADF&G has advocated the use of this standard and guideline (S&G), and the department played a major role in its adoption by the Forest Service. Note in Fig. 2 that according to the 1997 modeling that two major historic hunting areas for Ketchikan residents, the Cleveland Peninsula and Revillagigedo Island, scored above the S&G at 18.8 and 18.3 deer per square mile, respectively. However, according to the 2008 model for the current (2006) condition they scored well below the S&G at 13.6 and 11.7 deer per square mile. Moreover, Gravina Island was already below the S&G in 1995 at 13.0, but with the revised modeling (and when using ADF&G’s recommended Gravina Island Deer Multiplier of 35) it was at 7.3 deer per square mile in 2006.

<sup>6</sup> Caouette, J.; Kramer, M.; & Nowacki, G. (2000). *Deconstructing the Timber Volume Paradigm in Management of the Tongass National Forest*. USDA Forest Service, Pacific Northwest Station. PNW-GTR-482. 20p. [http://tongass-fpadjust.net/Documents/Caouette\\_etal\\_202000\\_GTR482.pdf](http://tongass-fpadjust.net/Documents/Caouette_etal_202000_GTR482.pdf)

<sup>7</sup> HSI is habitat suitability index, the non-dimensional output of the model that was mentioned in a previous footnote.

<sup>8</sup> Corrected by our RC13, submitted at the board meeting.

Fig. 2: Unit-1A Deer Model Carrying Capacities by WAA, for 1997 vs. 2008 models Edwards (23Dec12, for BoG comments)

WAA Location	WAA Number	1997 Model		2008 Model		Model Comparison		If Deer Mult. = 45	1997 Model	2008 Model	1997 Model	2008 Model
		Carrying Capacity	Area (sq-mi)	Carrying Capacity	Area (sq-mi)	1995 Over-estimation	2006 Carrying Capacity					
Gravina	101	13	62.1	21	62.1	-38%	9.4	-	807	585	13.0	9.4
Duke I.	303	19	73.3	18	73.3	3%	-	-	1393	1348	19.0	18.4
Revilla, east shore	404	22	281.4	12	281.4	86%	-	-	6191	3321	-	-
Revilla, Thorne Arm to Behm	405	24	83.4	18	83.4	34%	-	-	2002	1495	-	-
Revilla, Carroll Inlet	406	20	194.6	12	194.6	64%	-	-	3892	2374	-	-
Revilla, George Inlet	407	13	64.2	15	64.2	-12%	-	-	835	953	18.8	11.7
Revilla, Katchikan	408	7	26.0	13	26.0	-46%	-	-	182	335	-	-
Revilla, Clover to Francis	509	17	105.6	14	105.6	25%	-	-	1795	1431	-	-
Revilla, Traitors to Bell I.	510	17	237.1	10	237.1	79%	-	-	4031	2252	-	-
Revilla, Burroughs Bay	511	15	83.3	5	83.3	195%	-	-	1250	424	-	-
Cleveland, Spacious Bay	612	20	107.9	18	107.9	13%	-	-	2158	1907	-	-
Cleveland, Helm Bay	613	24	71.0	19	71.0	29%	-	-	1704	1321	-	-
Cleveland, Meyers Chuck	614	15	20.5	20	20.5	-24%	-	-	308	407	18.3	13.6
Cleveland, base	715	15	158.7	8	158.7	92%	-	-	2381	1238	-	-
Unuk River	716	3	523.8	4	523.8	-21%	-	-	1571	1980	3.0	3.8
Chickamin & Walker Cove	717	8	227.0	4	227.0	79%	-	-	1816	1012	8.0	4.5
Rudyerd Bay	719	4	311.9	4	311.9	-8%	-	-	1248	1354	4.0	4.3
Smeaton Bay	821	15	173.4	9	173.4	67%	-	-	2601	1554	15.0	9.0
Boca de Quadra	822	10	608.9	8	608.9	18%	-	-	6089	5170	10.0	8.5
<b>Unit 1-A total</b>									<b>3,414</b>	<b>42,251</b>	<b>12.4</b>	<b>8.9</b>

**Overall deer carrying capacity over-estimations of the 1997 model:**

Unit-1A: 39%

Gravina Island: 38%

Revillagigedo Island: 60%

Cleveland Peninsula: 34%

Data Sources: 1997 model results from the 1997 TLMP FEIS, Table 3-112.  
2008 model results and WAA land areas are from 2008 TLMP planning record document 0935 (0935.xls).

Accordingly, after assessing the improved modeling results it is unsurprising that the harvest of deer and the amount of hunter effort in Unit-1A have declined and that deer numbers are low, particularly after recent hard winters.

It is important to note that not all of the difference between the modeling of the 1995 and 2006 current conditions is due to corrections to the model. In that 11-year interim, second growth timber in clearcuts over about 25 years old entered the stem exclusion stage, which dropped their contribution to carrying capacity to essentially zero. Furthermore, the future stem exclusion condition of other second growth which was less than 25 years old in 2006 (or not yet created by clearcutting) is not reflected in Fig. 2.

The point here is that the deer modeling basis for the current deer population and harvest objectives that were set by the Board of Game in 2000 is no longer valid. An urgently needed action by the Board is to update those objectives. It is not valid to initiate a program of wolf intensive management on the basis of the outdated objectives. Moreover, if the Board acts contrary to wolves because prey is under-abundant for both wolves and meeting deer harvest objectives, we believe that is an indicator that listing the Alexander Archipelago wolf under the Endangered Species Act is warranted.



The availability of diverse food sources may enable wolves to sustain their numbers at higher levels than could be supported by deer alone. As a result, wolf predation on deer may, in turn, be increased. Nevertheless, any major reduction in deer numbers due to catastrophic winter conditions, or due to habitat alteration resulting from clear-cutting, could be expected to reduce wolf numbers or productivity.

Key words: Canis lupus, deer, food habits, habitat relationships, Odocoileus hemionus sitkensis, predator-prey, wolf.

## CONTENTS

Summary . . . . .	i
Background . . . . .	ii
Study Objective . . . . .	2
Job Objectives . . . . .	2
Study Area . . . . .	2
Methods . . . . .	2
Objective 1 - Size, Distribution, and Stability of Wolf Packs . . . . .	2
Objective 2 - Activity Areas, Hunting Patterns, and Deer-Kill Rates . . . . .	3
Objective 3 - Food Habits . . . . .	3
Results and Discussion . . . . .	4
Objective 1 - Size, Distribution, and Stability of Wolf Packs . . . . .	4
Town Pack . . . . .	4
Naha River Pack . . . . .	5
East Chuck Pack . . . . .	5
Carroll Inlet Pack . . . . .	6
Alava Bay Pack . . . . .	6
Lake Grace Pack . . . . .	7
Northeast Pack . . . . .	7
Objective 2 - Activity Areas, Hunting Patterns, and Deer-Kill Rates . . . . .	8
Objective 3 - Food Habits . . . . .	9
Conclusion . . . . .	12
Acknowledgments . . . . .	12
Literature Cited . . . . .	12
Figure . . . . .	15
Tables . . . . .	16

## BACKGROUND

This study was initiated as a long-term investigation of interactions between wolves (Canis lupus), deer (Odocoileus hemionus sitkensis), and habitat in coastal Alaska. Of particular concern was the effect of habitat alteration, through forest management, on the spatial relationships of deer and wolves, and the influence of wolf predation on deer numbers. A previous report completed under this study (Smith et al. 1986a) reviewed pertinent literature and identified the major needs for accomplishing the study objective. Concurrent work in the Petersburg area (Smith et al. 1986b, in press) also contributed to our understanding of relationships in this study.

Unfortunately, present levels of both wolf and deer populations are too low to facilitate efficient progress on several key jobs under this study. The nature of the vegetation and climate, combined with limited accessibility of

most of the study area, severely hampered attempts to capture wolves for telemetry and limited our ability to observe wolves or deer. Accordingly, it was decided to terminate this study at the end of the 2nd year.

#### STUDY OBJECTIVE

To determine the spatial and trophic relationships of wolves and deer in natural and altered habitats in Southeast Alaska.

#### JOB OBJECTIVES

1. To determine size, distribution, and stability of wolf packs.
2. To determine activity areas, hunting patterns, and deer-killing rates for specific packs.
3. To determine food habits of selected packs and of the overall wolf population.
4. To determine habitat composition of pack territories.<sup>1</sup>
5. To determine relative abundance of major prey species within selected pack territories.
6. To determine deer density relative to wolf pack territorial borders and habitat characteristics.
7. To monitor deer population trends in various habitat areas and wolf pack territories.

#### STUDY AREA

The study area consisted of Revillagigedo Island and the adjacent Cleveland Peninsula. Descriptions are provided in Smith et al. (1986a).

#### METHODS

##### Objective 1 - Size, Distribution, and Stability of Wolf Packs

Radiotelemetry was used to monitor wolf packs. Details of capture, handling, and monitoring techniques were presented in

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<sup>1</sup> Due to the early termination of this project, no activities were undertaken on Objectives 4-7.

Smith et al. (1986a). However, to reduce the frequency of injury to captured wolves, foot traps were replaced with foot snares during the 1985-86 field season.

#### Objective 2 - Activity Areas, Hunting Patterns, and Deer-Kill Rates

Radiolocations of each collared wolf were plotted on the territory-minimum convex polygon to identify activity areas within the territory. Timing of relocations was used to interpret the significance of replicate relocations within 1 general area (i.e., use of potential den sites from late April through June).

#### Objective 3 - Food Habits

Wolf scats were collected on a regular basis from logging roads and trails within the range of the Town Pack and opportunistically along other logging roads, beaches, and trails on Revillagigedo Island and the adjacent mainland. In addition, den and rendezvous sites used by radio-collared wolves were visited in late summer and all scats present were collected. Scats were also collected from rendezvous sites discovered by T. Kogut, USDA Forest Service Biologist, on Prince of Wales and Dall Islands.

Attempts were made to collect scats from all parts of Revillagigedo Island. However, scats were not collected in equal proportions from various pack territories or in different seasons, and none of the collections are likely to constitute a true random sample of scats from any area. Accordingly, results of analyses should be considered as indicative of general trends, and comparisons between subsamples should be interpreted with caution.

Collected scats were individually bagged in plastic, labeled with location, date, and estimated date of deposition (for fresh scats) and then frozen. Prior to analysis, scats were oven-dried at 100 C for 24 hours to kill *Echinococcus* eggs. Scats were then weighed to the nearest gram, broken apart in a tray, and a visual estimate made of the percentage of the scat composed of various diet items (e.g., adult deer hair or bones, fawn hair, bird feathers, etc.). Hair and bone fragments were compared with a reference collection and, if necessary, hair-scale imprints were used (Adorjan and Kolenosky 1969).

Scats less than 2 cm in diameter, collected in summer, were considered pup scats. Samples from den and/or rendezvous sites were treated separately to compare diets for specific packs during early pup-rearing periods.

Two statistics were calculated for each scat subsample:

- (1) Percent frequency of occurrence = number of times a diet item (e.g., deer hair) was found in the scat sample, divided by the total number of diet items found in the scats; and
- (2) Mean diet items per scat = total number of diet items in subsample divided by the number of scats.

The 1st variable provides information on the relative importance of various prey types in the diet. The 2nd value is an index of variety in the diet (Kuyt 1972).

Scats were grouped into subsamples (minimum  $n = 20$ ), based on the location of deposition, to provide estimates of diet composition for various wolf packs. Seasonal comparisons of summer (Apr-Sep) versus winter (Oct-Mar) diet were based on scats with known deposition dates.

## RESULTS AND DISCUSSION

### Objective 1 - Size, Distribution, and Stability of Wolf Packs

No additional wolves were captured and radio-collared during the 1985-86 season. On 2 occasions wolves were caught in neck snares, but managed to escape by chewing through the snare cable before we returned to check the snare. Wolf No. 2, a young male that was first captured on 13 February 1985, was recaptured and fitted with a new radio collar on 23 March 1986.

Results of radio tracking and observations of tracks supported the conclusion of Smith et al. (1986a) that a minimum of 7 wolf packs occur on Revillagigedo Island. The packs vary in size from 2 to at least 9 wolves and were found to use largely distinct territories (Fig. 1). Because pack movements were only monitored for 15 to 18 months, no firm conclusions regarding the pack's territorial stability could be made. However, some pack boundaries and use areas appeared to differ between 1985 and 1986. Descriptions of individual pack histories follow.

#### Town Pack:

Smith et al. (1986a) reported that this pack numbered 7 to 11 wolves in late 1984 and produced a litter of pups in 1985. During the 1985-86 winter at least 1 pack member was killed by other wolves in an apparent territorial dispute and 3 wolves were taken by a recreational trapper. At least 4-5 wolves remained in this pack subsequent to these losses, so the

minimum pack size in late 1985 had to have been 8-9 wolves. Although we observed 2 members of this pack breeding in February 1986, we did not confirm the presence of pups in spring. At the end of the study this pack was estimated to consist of at least 5 wolves.

Three members of the Town Pack were radio-collared in February 1985 and subsequent relocations indicated this pack utilized a territory of approximately 150-200 km<sup>2</sup> including the drainages of the White River and Ward, Ketchikan, Mahoney, and Silvis Creeks. In December 1985 this pack made a brief incursion into the territory of the Naha River Pack near Clover Passage. During this time radio-collared wolf No. 3, a juvenile male, was killed by other wolves (presumably members of the Naha Pack). The lack of snow made it impossible to determine if other wolves were killed in this conflict. In January 1986, radio-collared wolf No. 5, an adult female, made a brief incursion into the territory of the East Chuck Pack.

#### Naha River Pack:

The Naha River Pack contained 6-8 wolves in late 1985. Two female pack members were taken by a local trapper in January 1986.

Reported sightings by local residents, as well as our observations, indicated this pack ranged over an area of approximately 450 km<sup>2</sup> including the drainages into Clover Passage, Mosier, Margarita, and Naha Bays, Traitors Cove, and Leask Creek (Fig. 1). No members of this pack were radio-collared, however, so actual pack boundaries were not established. The limited amount of sign observed along the beaches in this pack's territory indicates it spent much of its time inland along major lake and stream systems.

#### East Chuck Pack:

Smith et al. (1986a) indicated that this pack consisted of 3 to 5 wolves in 1984, including radio-collared wolf No. 2, a juvenile male. It was suspected that the pack produced pups in 1985. No direct observations of the East Chuck Pack were made prior to late November 1985; at that time, wolf No. 2 dispersed, but tracks in the snow indicated the pack still numbered about 5 wolves. Following No. 2's dispersal, contact with this pack was lost; however, 2 other members were subsequently caught by a local trapper in the vicinity of George Inlet, and tracks of more wolves were seen, indicating several pack members remained.

The 2 wolves that were trapped were an adult female and a male pup. Both trapped wolves were in extremely poor condition when caught and neither had any body-fat deposits. Although

these wolves may have lost some weight while in the traps, their poor body condition suggests that wolves in this pack are food-stressed.

Wolf No. 2 was observed alone within the pack's territory several times in November 1985; he then left the territory in December. Initially, he moved to Rudyerd Island where he was observed to have killed a deer. After 2 weeks there he returned to his natal pack territory for 1 week, but was not observed with other wolves. He then moved west to Carlanna Lake in the Town Pack territory for 1 week, returned to his natal pack area, and finally moved east across Carroll Inlet and settled into the territory of the Carroll Inlet Pack.

#### Carroll Inlet Pack:

Smith et al. (1986a) reported that the Carroll Inlet Pack had been reduced through trapping and hunting in 1984 from 10, to 12, to as few as 2 wolves. Tracks observed on logging roads west of Thorne Arm in November 1985 indicated only 2 or 3 wolves were using the area at that time. Subsequently, wolf No. 2 moved into this territory and, based on tracks observed at the time he was recaptured, he joined up with 2 wolves; presumably these were the remnants of the Carroll Inlet Pack.

Although these 3 wolves were running together prior to the mating period in 1986, it is not known whether either of the Carroll Inlet Pack wolves were females which might have bred with wolf No. 2, or if this pack produced pups in 1986. From February through the end of June 1986, these wolves ranged over an area of approximately 150 km<sup>2</sup> (Fig. 2).

#### Alava Bay Pack:

Smith et al. (1986a) reported that the Alava Bay Pack consisted of 2-3 wolves, including radio-collared wolf No. 7, an adult male, in late winter 1984-85, and that there was evidence that the pack had produced pups in spring 1985. Several repeat observations of this pack in November and December 1985 confirmed that the pack had increased to a minimum of 9 wolves. Although the lack of snow at low elevations prevented tracking and hampered direct observation in 1986, at least 7 wolves remained in this pack in late February. It is not known whether additional pups were produced in spring 1986.

During late winter and spring 1985, Smith et al. (1986a) reported that this pack ranged over approximately 75-100 km<sup>2</sup> (Fig. 1). Summer movements of wolf No. 7 were also confined to this area, but beginning in fall, the pack began to heavily exploit what previously had appeared to be a buffer zone between its territory and that of the Lake Grace Pack.

In 1986, wolf No. 7 "disappeared" for several weeks but was eventually relocated 5 km northwest of his previous extreme movement. At that time he was apparently returning from an even longer extraterritorial excursion (Messier 1985). From late April until the end of the project he remained in the southern portion of the territory within 5-10 km of the 1985 den site.

#### Lake Grace Pack:

Smith et al. (1986a) reported that prior to birth of pups, this pack had declined from 6 or 7 in late 1984, to 3, including radio-collared wolf No. 6, an adult male. Observations in summer and early winter confirmed that at least 3 pups had been produced. No wolves from this pack were trapped or shot during the 1985-86 season and the pack remained at 6 wolves through March 1986.

Movements of wolf No. 6 in spring 1986 indicated the pack was using a den and probably had pups. However, no observations were obtained to confirm pack size at the end of the study. This pack ranged over a total of approximately 400-450 km<sup>2</sup> including Smeaton Island (Fig. 1). The pack moved onto Smeaton Island at least 3 times during the period in which it was monitored, including a 3-week stay in January and a 4-week stay in February-March 1986.

#### Northeast Pack:

Smith et al. (1986a) estimated that a total of 8 wolves occurred within this pack's territory in late 1984, although 2 of these were a distinct social group from the other 6. By June 1985, 1 member of each group had been radio-collared but each died of starvation soon after marking. One additional wolf may have been lost as a result of a trapping encounter (Smith et al. 1986a).

In September 1985, evidence was found that 4 to 6 wolves from this pack were feeding on spawning salmon (*Oncorhynchus* spp.) and beaver (*Castor canadensis*) in the vicinity of Portage Cove. Throughout the remainder of the 1985-86 field season, however, only 2 sets of single wolf tracks were observed along beaches and trails in this pack's territory. At present, the size of this pack is unknown.

Although the total area identified as being within the territory of this pack is 350-400 km<sup>2</sup>, much of the northeastern half of this area is virtually devoid of deer, beaver, and salmon-spawning streams. We believe the area actually used by this pack is much smaller and is centered on the drainages of Portage Cove, Neets Bay, Shrimp Bay, Gedney Pass, and Behm

Canal west of Claude Point. The limited sign observed along beaches in 1986 indicates this pack must spend much of its time inland along major lake and stream systems.

Objective 2 - Activity Areas, Hunting Patterns, and Deer-Kill Rates

During late summer 1985, 2 of the 4 radio-collared packs centered their activities on major salmon spawning systems. The Town Pack was repeatedly relocated in the lower White River drainage from mid-August through early October. During that time, in excess of 120,000 salmon spawned and died in the White River (ADF&G, unpubl. data). The East Chuck Pack spent the same time period in the vicinity of 2 creeks draining into the salt chuck at the head of George Inlet. These streams each contained more than 10,000 pink and coho salmon.

On-the-ground observations in both areas used by these packs confirmed that wolves were catching spawning salmon and feeding extensively on the fish. In addition, fisheries personnel who were interviewed after stream surveys were completed reported evidence of wolves feeding on salmon along virtually every major spawning stream in the Behm Canal district. The Alava Bay Pack also made frequent visits to salmon spawning streams, but did not remain in 1 area as much as the Town or East Chuck Packs. This may reflect the relatively large number of small stream systems in the Alava Bay Pack territory, as opposed to the few large spawning streams in the other packs' ranges.

The Lake Grace Pack was the only pack that did not appear to use spawning salmon in summer. However, it made more extensive use of alpine and subalpine areas than other packs and also used a clear-cut valley that had been extensively colonized by beaver. The pack's use of high elevations was apparently associated with deer on alpine summer range.

The efficiency with which wolves located deer within their territories was demonstrated by the Lake Grace Pack. In several summers' flying along alpine ridges, we only observed deer in 2 locations within this pack's territory (Smith 1984, and unpubl. data), one of which was west of Mirror Lake. Five days after we first observed 13 deer on this ridge in early September 1985, the Lake Grace Pack was located on an apparent kill where these deer had been. The wolves remained in this area for 2 weeks, during which time we did not see deer again.

During the 1985-86 winter months, the Town Pack again made frequent use of the Ketchikan landfill as reported for the winter of 1984-85 (Smith et al. 1986a). However, the pack spent more time hunting other parts of its territory than in

1984-85. In addition, juvenile female wolf No. 4 was more frequently located apart from her mother, wolf No. 5, during this 2nd winter.

The Alava Bay Pack moved extensively throughout its territory in winter and did not concentrate its activities in any particular location. However, relocations were frequently made along stream courses where beaver dams and/or houses were evident, as well as in beach fringe areas or on points where deer densities were relatively higher.

The Lake Grace Pack was generally found during early- and mid-winter 1985-86 to be hunting relatively steep slopes along the major lakes within its range, near beaver colonies at the inlets to these lakes, or on Smeaton Island. In the latter area, the pack was apparently feeding on deer, as there is no evidence that beaver occur on this island.

In late winter of 1986, the Lake Grace Pack abandoned Smeaton Island and returned to hunting near beaver colonies at the head of Mirror Lake and along the Manzanita River. The pack also made several visits to low ridges in the southwest portion of its territory where deer tracks were occasionally observed in the snow.

In spring 1986 the Lake Grace Pack appeared to settle into a den site in the lower Manzanita River drainage. The area was similar to its 1985 den site, consisting of a stand of mature spruce trees in the vicinity of a large complex of beaver dams.

The lack of snow at most elevations used by wolves during the majority of the winter of 1985-86, combined with dense vegetation, prevented our gathering further data on hunting patterns or deer-killing rates. However, given an average pack size of 5-7 wolves, and each wolf's ability to consume 5-10 kg of deer following a kill (Mech 1970:118), the packs studied here could easily consume an entire deer (average live weight: 35-45 kg [ADF&G unpubl. data]) within hours. Thus, even under ideal conditions it is unlikely that wolves would often be found on a kill.

### Objective 3 - Food Habits

A total of 511 scats containing 594 diet items from 13 different food sources was collected during this study (Table 1). Deposition date could accurately be determined for 271 of these scats. For the overall sample during summer, wolves fed predominantly on deer, including a high proportion of fawns. Beaver also constituted a major proportion of the summer diet (Table 1). For the Revillagigedo Island summer subsample ( $n = 196$ ) the same general pattern prevails (Table 2).

Numerous other studies report a similar high proportion of deer fawns, or other young ungulates, in summer wolf scats (Murie 1944, Mech 1966, Pimlott et al. 1969, Carbyn 1974, Peterson 1974, Voight et al. 1976, Scott and Shackelton 1980, Hatter 1984). In fact, Hatter (1984) concluded that on Vancouver Island, black-tailed deer fawns were the major prey item for wolves from June through August. The ratio of fawn:adult remains in scats analyzed by Hatter was almost identical to the ratios from Southeast Alaska and Revillagigedo Island samples (Tables 1 & 2), so fawns may be more important than adults in the summer diet here as well.

Although many other studies report the use of beaver by wolves (Murie 1944, Mech 1966, 1970; Peterson 1974, Carbyn 1974, Theberge et al. 1978, Scott and Shackelton 1980, Hatter 1984) few have indicated use as high as found here. Those studies that do indicate levels of use of beaver, in summer, of over 20% frequency of occurrence (Pimlott et al. 1969, Frenzel 1974, Voight et al. 1976) were generally conducted in areas with very low deer populations.

As previously discussed, wolves were known to be feeding extensively on salmon during late summer, but this use was not reflected in scats. Two potential sources of bias may have caused this. First, only scats that could positively be identified as wolf scats were collected, so amorphous scats, which were found along stream banks and composed entirely of fish remains, were rejected, as they might possibly have been from bears. Second, observations and telemetry indicated that although the wolves came down to the streams to catch and feed on the salmon, they usually moved away from the stream to bed down. This movement may have been designed to avoid contact with bears and would have resulted in the wolves' defecating away from the stream banks where we searched for scats.

The winter diet of wolves in Southeast Alaska in general and Revillagigedo Island in particular, was also dominated by deer (Tables 1 and 2). However, beaver continued to represent approximately 20%, and other sources accounted for about 10% of the diet items.

Throughout much of the range of wolves in North America beavers are unavailable in winter (Mech 1970) and only Scott and Shackelton (1980) reported significant use of beaver in winter. The availability of beavers year-round in coastal regions provides an important supplement to the wolf diet and may increase wolves' ability to regulate deer populations (Van Ballenberghe and Hanley 1982).

Comparison of the diets of 5 wolf packs on Revillagigedo Island reflects regional variation (Table 3). Wolves in the Alava Bay and East Chuck Packs consumed approximately 90%

deer, whereas wolves in the Naha and Northeast Packs consumed only about 65% deer, and the Town Pack wolves, only 55% deer. Beaver constituted one-third of the diet for the Naha and Northeast Packs, and the Town Pack fed heavily on garbage from the Ketchikan landfill. The variation in diet reflects deer population density and availability of alternative food sources.

Similar patterns are reflected in scats collected from summer-use sites on Revillagigedo, Prince of Wales, and Dall Islands (Table 4). Scats from wolves on southern Revillagigedo (Alava Bay Pack) as well as on Prince of Wales and Dall Islands, where deer densities are relatively high, contained 93-96% deer, much of which was fawn hair. Scats from the Town and Lake Grace Packs' areas revealed that deer constituted less than half the diet in summer. The former pack used human garbage, and the latter pack, beaver, in nearly equal proportions to deer in the summer. These trends reflect the fact that the Town Pack's den was located near the Ketchikan landfill and that the Lake Grace Pack's den was near an area of extensive beaver colonies.

The mean number of prey items per scat ranged from 1.0 to 1.5 for various subsamples (Table 5). Comparisons between summer and winter diets of wolves on Revillagigedo Island indicate a more varied diet in summer (Table 5). It would seem logical to find a more varied diet in summer, when fish, small mammals, and birds are more available, than in winter, and to find a more varied diet where deer are less available. Comparisons between the sampled packs' diets revealed that the Town Pack had a more varied diet than any other group, both in summer and overall (Table 5). This variation was largely due to the availability of human garbage as a supplement to the usual prey items.

Scott and Shackelton (1980) reported finding only 1 prey item per scat in Vancouver Island wolf feces, but Murie (1944) found more than 1 prey item per scat in feces from wolves in interior Alaska when wolves were preying on rodents in addition to ungulates. Kuyt (1972) reported highly varied spring and summer diets for tundra wolves, particularly during periods when the primary prey species, caribou (Rangifer tarandus), was less available.

The significance, for wolves, of dietary variation, has not been assessed, but the availability of alternative sources such as beaver, salmon, and garbage should reduce this predator's dependence on deer. When other food resources are available, wolves may be able to sustain themselves with relatively low deer-killing rates, despite the small size of Sitka black-tailed deer.

## CONCLUSION

Although results of this study are limited, they generally support the concepts and concerns advanced by Van Ballenberghe and Hanley (1982). Specifically, we determined that while wolves prey mainly on deer, other sources of food such as beaver, salmon, and human garbage supplement the diet and enable wolves to persist in relatively stable numbers despite low deer densities. Nevertheless, a wolf pack's territory size and the number of pack members appeared to be related to deer population density, so further declines in deer numbers or productivity due to climate or habitat alteration will probably result in fewer wolves as well.

Wolves were found to be efficient at finding localized areas with relatively high deer numbers, and packs could be expected to take advantage of artificial concentrations of deer in habitat patches created through forest management. Accordingly, timber harvests should be designed so as to minimize formation of small "islands" of old growth and to assure mobility of deer between areas as suggested by Harris (1984).

## ACKNOWLEDGMENTS

Many members of the Game Division staff in Region I contributed to the development and implementation of this project. Gerry Downy contributed substantially to the wolf capture effort and his local knowledge of wolf movements was helpful in mapping pack distributions. Dick Hamlin, Jim Jakubek, and Dan Hassell piloted survey and telemetry flights with skill and keen interest in the project which made flying in the frequently poor weather conditions both safe and enjoyable. Greg Clevenger of the USDA Forest Service arranged cooperative funding and was highly supportive of the project. Skipper Ron Rusher and Assistant Boat Officer Kevin Perry of the R/V Sundance provided logistical support for the project; their help is greatly appreciated.

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Table 2. Percent frequency of occurrence of items in the diet from summer (Apr-Sept) and winter (Oct-Mar), and from total scats collected from wolves on Revillagigedo Island, Alaska, 1984-86.

Diet item	Season		Total <sup>c</sup>
	Summer <sup>a</sup>	Winter <sup>b</sup>	
Adult deer	42.5	71.2	55.6
Fawn deer	30.3	--	18.7
Total deer	72.8	71.2	74.3
Beaver	24.0	19.7	20.1
Bird	0.9	1.5	1.1
Wolf	0.4	1.6	0.8
Garbage	0.4	1.5	1.1
Fish	0.9	1.5	0.6
Toad	0.9	3.9	0.6
Unidentified bones	0.4	0.9	0.8
Black bear	0.9	0.9	0.6

<sup>a</sup>  $\bar{n}$  = 196 scats, 221 items.

<sup>b</sup>  $\bar{n}$  = 64 scats, 66 items.

<sup>c</sup>  $\bar{n}$  = 329 scats, 363 items.

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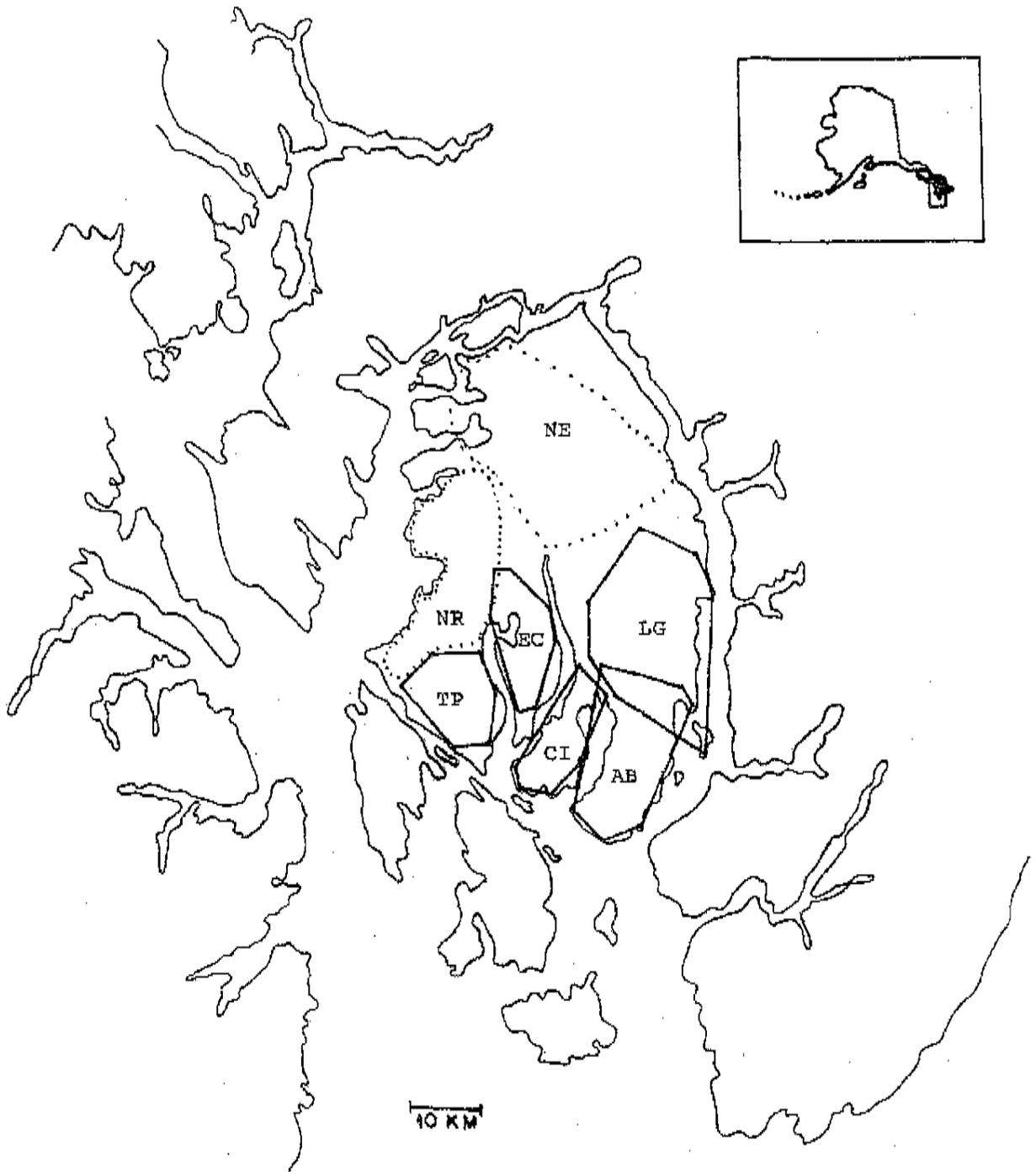


Fig. 1. Location of known (solid lines) and suspected (dotted lines) wolf pack territories on Revillagigedo Island, Alaska, 1985-86. TP = Town Pack, EC = East Chuck Pack, CI = Carroll Inlet Pack, AB = Alava Bay Pack, LG = Lake Grace Pack, NR = Naha River Pack, and NE = Northeast Pack.

Table 1. Percent frequency of occurrence for items in the diet from summer (Apr-Sep) and winter (Oct-Mar), and from total scats collected from wolves in Southeast Alaska, 1984-86.

Diet item	Season		Total <sup>c</sup>
	Summer <sup>a</sup>	Winter <sup>b</sup>	
Adult deer	42.1	68.5	50.2
Fawn deer	29.8	--	20.2
Total deer	71.9	68.5	70.4
Beaver	23.7	17.8	13.5
Seal	0.0	0.0	0.2
Bird	1.3	4.1	2.5
Wolf	0.4	1.4	1.2
Garbage	0.9	1.4	8.2
Porcupine	0.0	1.4	1.3
Fish	0.9	1.4	1.3
Toad	0.9	2.7	0.3
Unidentified bones	0.4	0.9	1.2
Black bear	0.9	0.9	0.3
Mustelids	0.4	0.9	0.3

<sup>a</sup>  $\bar{n}$  = 201 scats, 228 items.

<sup>b</sup>  $\bar{n}$  = 70 scats, 73 items.

<sup>c</sup>  $\bar{n}$  = 511 scats, 594 items.

Table 3. Percent frequency of occurrence of items in the diet from scats collected from 5 wolf packs on Revillagigedo Island, Alaska, 1984-86.

Diet item	Wolf pack				
	Town <sup>a</sup>	Naha <sup>b</sup> River	Alava <sup>c</sup> Bay	Northeast <sup>d</sup>	East <sup>e</sup> Creek
Adult deer	50.9	65.1	58.8	57.9	90.9
Fawn deer	4.9	0.0	29.9	5.3	0.9
Total deer	55.8	65.1	88.6	63.2	90.9
Beaver	1.2	34.9	9.9	31.6	0.0
Bird	3.1	0.0	0.8	2.6	0.0
Wolf	3.1	0.0	0.0	2.6	0.0
Garbage	30.1	0.0	0.0	0.0	0.0
Fish	1.2	0.0	0.0	0.0	9.1
Toad	1.2	0.0	0.0	0.0	0.0
Unidentified bones	3.7	0.0	0.0	0.0	0.0
Black bear	0.6	0.0	0.8	0.0	0.0

<sup>a</sup>  $\bar{n}$  = 124 scats, 163 items.

<sup>b</sup>  $\bar{n}$  = 40 scats, 43 items.

<sup>c</sup>  $\bar{n}$  = 124 scats, 131 items.

<sup>d</sup>  $\bar{n}$  = 36 scats, 38 items.

<sup>e</sup>  $\bar{n}$  = 21 scats, 22 items.

Table 4. Percent frequency of occurrence of diet items in scats collected at den and summer rendezvous sites for 5 wolf packs on Revillagigedo, Prince of Wales, and Dall Islands, Alaska, 1985.

Diet item	Wolf pack				
	Town <sup>a</sup>	Old Tom's <sup>b</sup> Lake	Alava <sup>c</sup> Bay	Bob's <sup>d</sup> Bay	Lake <sup>e</sup> Grace
Adult deer	30.5	35.3	60.6	48.2	12.8
Fawn deer	11.9	58.8	32.0	48.2	37.1
Total deer	42.4	94.1	92.6	96.4	49.9
Beaver	0.0	2.0	5.7	0.0	45.7
Fish	3.4	0.0	0.0	0.0	0.0
Garbage	39.0	0.0	0.0	0.0	0.0
Bird	1.7	2.0	0.8	0.0	1.4
Black bear	0.0	0.0	0.8	0.0	0.0
Unidentified bones	6.8	0.0	0.0	0.0	1.4
Mustelid	0.0	2.0	0.0	0.0	0.0
Seal	0.0	0.0	0.0	3.7	0.0

<sup>a</sup>  $\bar{n}$  = 39 scats, 59 items.

<sup>b</sup>  $\bar{n}$  = 43 scats, 51 items.

<sup>c</sup>  $\bar{n}$  = 115 scats, 122 items.

<sup>d</sup>  $\bar{n}$  = 26 scats, 26 items.

<sup>e</sup>  $\bar{n}$  = 55 scats, 70 items.

Table 5. Mean number of diet items per scat in wolf feces collected in Southeast Alaska, 1984-86.

Source	Season	Mean	(n)
Town Pack	Summer	1.51	39
Old Tom's Pack	Summer	1.19	43
Alava Bay Pack	Summer	1.06	115
Bob's Bay Pack	Summer	1.00	26
Lake Grace Pack	Summer	1.27	55
Revillagigedo Is.	Summer	1.13	196
Revillagigedo Is.	Winter	1.05	64
Town Pack	Total	1.31	124
Naha River Pack	Total	1.08	40
Alava Bay Pack	Total	1.06	124
Northeast Pack	Total	1.06	36
East Chuck Pack	Total	1.05	21
Southeast Alaska	Total	1.16	511



## FAX COVER SHEET

TO	Board of Game
COMPANY	
FAX NUMBER	19074656094
FROM	Gabriel Scott
DATE	2013-03-01 21:10:01 GMT
RE	Public Comments

### COVER MESSAGE

Attached are comments of Cascadia Wildlands regarding proposals at the upcoming Board of Game meeting.



# Cascadia Wildlands

we like it wild.

Board of Game

RE: Proposals 178A, 179A

Please consider the following comments of Cascadia Wildlands, a nonprofit conservation organization dedicated to protecting the lands, waters and wildlife of the Cascadia bioregion. Cascadia, the temperate rainforest that stretches along the Pacific coast from northern California to South-central Alaska, is a unique and valuable ecosystem.

Our primary interest in these proposals is that they threaten our ability to live sustainably with wolves. It is critically important we learn to live with wolves. Our organization's vision statement includes "wolves howling in the back country," not because they are photogenic and cute, but rather because ecologically the presence of large predators is critical to a healthy Cascadia. We've devoted a great deal of effort in recent years assisting with wolf reintroduction efforts in the Pacific Northwest. Living through this experience, we are keen to avoid a replay in Southeast Alaska. Conservation is a thousand times easier and less costly than restoration.

Cascadia strongly agrees with the underlying motivation of these proposals, given that deer hunting has become a great deal more difficult in recent years. We strongly believe that subsistence hunting is the highest and best "use" of our wildlife. Nothing is more important than subsistence. Subsistence is always priority #1. Contained within that statement is recognition that subsistence is only subsistence where it is sustainable. Otherwise it's not subsistence, but self-destruction.

We strongly disagree, however, that the proposed solution is the right one, for the following reasons.

### **Old-growth habitat loss is the root cause, not wolves**

The underlying problem here is not wolves, but rather a shortage of appropriate habitat. That has been the case in both of the proposed treatment areas. A legacy of clearcut logging has removed thousands of acres of habitat. That causes several problems. With less high-quality winter habitat (big trees, low elevation, south facing), deer become much more susceptible to population collapses after deep snow winters, particularly when they come in succession. Also, when clearcut timber stands enter the stem exclusion phase 20 or 30 years after harvest, the dense tree stands shade out undergrowth and become functionally useless as summer or winter browse for deer. This stem exclusion phase lasts for something on the order of 100 years. Additionally, habitat connectivity is diminished when contiguous forest stands are slashed apart by clearcuts and roads, making winter movement more difficult. Additionally, when they are limited to small stands of available habitat in a patchworked landscape, and forced into narrow migration corridors, deer become more susceptible to predation. All of these factors are established by a body of scientific work and reflected in the

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Operational Plans prepared by ADF&G. The deer/habitat relationships are much more well-understood than are the predator-prey dynamics.

Given this context, predator control should not be considered before opportunities for habitat restoration and conservation have been exhausted. In that vein, it is ironic that the State has supported further clearcutting, which would further diminish habitat. If we are serious about sustaining good deer hunting opportunities (and we should be!), then habitat conservation needs to be taken seriously.

It is doubtful that deer populations can be meaningfully enhanced with wolf control where adequate deer habitat does not exist. In general, winter habitat is the limiting factor for deer populations. Unfortunately, units 3 and 1a have both been extensively clearcut, and Forest Service timber sales continue to erode the habitat base. There may be some level of the predator pit phenomenon, with wolf predation holding deer populations down. But even still, if habitat continues to erode the population can't rebound even if every predator were removed. Worse, as pointed out in the Operational Plan for Unit 1a, "if deer are proximal to winter [carrying capacity], releasing them from top-down forcing (predation) could be disastrous in the long-term, i.e. they could cause long-term damage to their habitat and the habitat carrying capacity." GMU 1a Operational Plan at p.4. Unfortunately, current data do not tell us how close deer are to the habitat capacity, although as the Operational Plans point out preliminary results of one study on Gravina Island suggesting that could be the case. Heavy deer losses in recent deep-snow winters strongly suggest winter habitat is a current limiting factor.

#### **Existing deer habitat capacity is lower than the current numbers**

The Board-established carrying capacities, which were set in 2000, are incorrect as a matter of science. The old deer habitat model, on which the population objective is based, greatly overstated suitable habitat. We hereby adopt the comments of Larry Edwards, Greenpeace, explaining in more detail how and why that model was flawed, and what the implications are for the targeted areas. The best information clearly shows that the old model results were over-estimates. Given that the old model was found invalid by the 9<sup>th</sup> Circuit Court of Appeals, and that corrected calculations have been run, it would be exceedingly unwise for the Board to rely on that data in establishing this plan.

Changes in human demographics (ie. closure of the pulp mills, resulting in far lower hunting/trapping effort) further complicate the question. Also, the method of tracking harvest changed in 2011, making trends hard to detect. Given these problems, we strongly urge the Board to re-evaluate the harvest objectives and the determination of carrying capacity. It would be tragic futility to try and force artificially large deer populations.

#### **The high degree of scientific uncertainty should inspire a precautionary approach.**

The current state of science regarding Alexander Archipelago Wolves and Sitka black tail deer is not sufficiently developed to support an intensive management program. The list of things we do not know is just too long. We don't know how many wolves there are. We have little ability to track population trends. We don't entirely understand how wolf and deer populations interact, particularly in the context of habitat changes. We are unsure what impact climate change will have on the ecosystem.

The information we do have should inspire a conservative approach. Deer and wolf populations are certainly directly related, and certainly that relationship is not directly linear. It is certain that tens of



thousands of acres of the best deer habitat has been removed. It is certain that the deer population is susceptible to fairly wild population fluctuations, particularly with the removal of winter habitat. It is certain that the global climate is changing at a rapid pace, and that this has impacts on forests and wildlife. It is certain that humans have exterminated wolves from other areas in the name of predator control, only to later realize that these large predators are on balance beneficial.

**The conclusion that consumptive use is the preferred use of deer must not be allowed to swamp other factors.**

In general, we are in strong agreement that consumptive hunting of deer is a preferred use. At the same time, we urge the board to remember to consider additional factors as well. A thing can be the most important thing, without being the only thing. All other factors shouldn't be thrown to the wayside with a simplistic deer-hunting-good decision-rule.

A distinction should be made between subsistence and recreational hunting. Our #1 priority should be that subsistence needs are consistently met, not that as many deer as possible can be hunted. It is worth making a monumental effort and incurring some ecological risk to preserve subsistence hunting opportunities, where those are threatened. But the cost-benefit ratio is radically different where the only upside would be a simple increase in deer hunting success, where there are not actual shortages.

**The proposed methods are not feasible and not worth the expense.**

As experiments, the value of the proposals should be evaluated in that context. The operational plan for Unit 3 for instance lays out the objectives as:

to evaluate whether (a) wolf control in a small portion of GMU 3 can reallocate a measurable proportion of deer mortality from wolves to humans and (b) whether population estimation techniques for both predators and prey can be refined to measure the effectiveness of the IM actions, and (c) whether 1-2 hired wolf trappers, operating during the established wolf trapping season and using standard trapping techniques, can reduce wolf numbers sufficiently to bring about an increase in the area's deer population.

GMU 3 IM Operational Plan at 1.

As an experiment the proposals beg the question. The logic is circular. The proposal has conflicting goals: to find out whether the project would work, and at the same time to find out whether we can find out whether the project would work. How will we know if wolf control can reallocate deer mortality, if we don't know whether population estimation techniques can measure their effectiveness? If the estimation techniques fail, how will we know? How would we know if the estimation techniques are actually measuring program effectiveness, or if results reflect some other factor? The proposal needs to be further developed to have scientific integrity as an experiment. If we are going to do this, let's do it right.

The proposed method of hiring trappers is imprecise and messy at best. It may not be feasible to just go out and trap a specific number of wolves. This approach will be especially messy in the experimental context, because the quality of information gathered would be questionable. We would greatly prefer ADF&G staff do actual implementation. Again, if we are going to do this, we'd better cross all our Ts and do it by the book.



Bear predation of deer works against feasibility of the proposal. Most obviously, wolf control may not be effective in increasing deer populations if bear predation is the larger factor, or if bear predation would increase to replace previous wolf predation. The bear issue also greatly undermines feasibility of gathering reliable experimental data. Bear predation on deer is not very well understood, and is not monitored in any detailed way, so whatever conclusions could be drawn from the proposed wolf-killing experiment would be confounded by uncertainty on the bear factor. A better approach would be to first gather more information on bear predation in these areas, so that this factor can be addressed in a scientific way.

If it were feasible that one or two trappers could greatly increase the deer population, then there should be other ways to gather than information. Trapping is a long tradition, as is deer hunting. Have there been reported instances — even anecdotal ones — of trappers causing the deer population to increase because of trapping effort? I have heard stories like that in the interior, but never in Southeast. It would be much cheaper and more feasible to invest funds in monitoring deer and wolf populations in areas that are known to have extensive trapping.

The financial costs of this endeavor need to be carefully considered. These proposals would obligate the State to pay costs of killing wolves, monitoring results, and policing the endeavor. It is unclear how much it will cost, either in absolute terms, or in terms of the cost per-wolf killed and per-deer saved. Please also look at the long-term costs. If we start down this road, will we have to continue on it? And if so, are the long-term benefits worth the costs? In our opinion, when

The proposal is not a “recognized” management technique. It is experimental. A program like this has never been done here before, at least not in an experimental context. There are a multiplicity of factors in play — habitat loss, climate change, changing human population patterns, and complex predator-prey dynamics— all of which are integral, and few of which are very well understood. The lack of experience and uncertainty regarding utility of the proposal should factor into the cost-benefit analysis.

Please remember that the Alexander Archipelago Wolf is a different critter from the Grey Wolf found in the interior, and on the mainland of the lower 48 and Canada. Physically and behaviorally they are not the same. The landscape of Southeast Alaska, a coastal temperate rainforest, is also radically different. The wolves' prey, Sitka Blacktail deer, are a very different animal than the caribou and moose found elsewhere in Alaska.

The small areas targeted are another concern with regard to feasibility. Wolves can be an extremely mobile critter, so when removed from one area other wolves and wolf packs would be expected to move in. It is hard to imagine how a one-time effort could succeed.

Unreported and illegal hunting/ trapping could confound the dataset generated by the proposed experiment, making it difficult or impossible to draw conclusions whether the 1-2 hired trappers have made a difference. Available information suggests there are roughly equal amounts legal and illegal wolf harvest in Southeast. Unless the Board also prohibits hunting and trapping in the project area, there will be no way to control the experiment. To present one hypothetical, let's suppose the hired trapper actually does take 80% of the wolf population, and that the deer population rebounds. But also suppose some other hunter or trapper happened to take the remaining 20% as well. In that situation, we would draw the erroneous conclusion that an 80% reduction caused the observed effect, when in reality it was the consequence of 100% extirpation.



Of even more concern, we would have inadvertently eliminated wolves from the area, which could have extremely negative effects.

### **Wolf viability and sustained yield**

For several different reasons, it is critical that the Board carefully consider the project's impact on wolf populations, in light of the need to assure they are viable and sustainable. The board has the non-discretionary duty to manage wolves for sustainability. Article VIII, §4 of the Alaska constitution requires that wolves be managed on a sustained yield basis, which necessarily requires a viable population be sustained. See *West v. State*, 248 P.3d 689, 701 (Alaska 2010) ("It is the Board's constitutional and statutory duty to apply principles of sustained yield when it adopts predator control plans; this is not a policy question subject to Board discretion.").

Article VIII aside there are good reasons to protect wolf populations. Wolves are an important subsistence species in their own right (albeit not nearly so important as deer), so fall under the protection of both Federal (ie. ANILCA) and State subsistence law. Wolves are also protected by federal environmental laws such as NFMA, which requires land managers like USFS to assure viable and well-distributed populations. See 36 CFR 219.19 (1982).<sup>1</sup> Petitions to list the Alexander Archipelago wolf under the Endangered Species Act have been submitted several times, and these petitions have merit. A petition in the late 1990s was dismissed only on the basis that the Tongass land management plan's "conservation strategy" would protect wolves. Since that time the State and Forest Service have relentlessly sought to weaken the conservation strategy, and this proposal calls that earlier assumption even more into question. The conservation strategy certainly didn't anticipate wolf eradication efforts such as are proposed. To the contrary, as stated in the recent Tonka FEIS (and as reflected in the EISs for the 1998 and 2008 Forest Plans), the Petersburg Salt Chuck Wilderness is designated as a reserve area for wolves that is supposed to act as a source of dispersing wolves. Obviously it could no longer fill that function if the Board targets those wolves for predator control. Ironically, in an effort to reduce wolf numbers the Board inadvertently could cause an ESA listing, which would make future wolf control (and even wolf hunting and trapping) illegal under Federal law. Nobody wants that.

Reducing wolf populations by 80% (or more) in these areas would be a major blow to wolf viability. Concern for wolves primarily relates to long-term declines in deer populations, which fundamentally result from logging. The problem in that context has been that land management has been targeted to leave only enough deer for wolves, but not enough for deer and human hunters. This proposal indicates that when push comes to shove, the State of Alaska will exterminate wolves before it will stop degrading habitat or restrict hunting. Predator control could mask what is a long-term problem, resulting in even more habitat loss and future declines in both deer and wolf populations.

We are concerned that an attempt to harvest 80% of the area wolves could accidentally result in 100% harvest. Experience has shown that is certainly possible. Given the imprecision of population numbers, it would not be possible to know how many wolves are 80% of them. That big problem aside, all the incentives for the trapper who is hired would be to harvest as many wolves as possible, even beyond a quota. Why not? Once you are there and trapping wolves, why not get as many pelts

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<sup>1</sup> The 2008 Tongass Forest Plan was adopted under the 1982 regulations, and explicitly incorporates the viability rule, so the 1982 NFMA regulations continue to apply on the Tongass.



as you can? Would the trappers who are hired have to sacrifice their own Article VIII constitutional right to trap and hunt? What of other trappers and hunters? With the project areas targeted by timber sales, it is foreseeable that they will see increased trapping and hunting effort. These problems aside, even with the best efforts of a hired trapper to get a certain number and no external factors, it would be very easy to over-succeed.

The proposal only targets a select area, so obviously there is lots of other land for wolves to roam. Yet many of these other places have degraded habitat and low deer numbers. Long-term, there is concern. Ironically, the Wilderness area that is included in the proposed treatment is viewed as a habitat refuge, which assures long-term wolf viability in this area. Because the assumption is that the area will retain wolf packs and send out dispersing wolves, habitat is being even more severely degraded with the Tonka timber sale. The proposed IM wolf kill program throws a wrench in the gears of that conservation strategy.

Our concern for wolf sustainability is compounded by the observation that the Forest Service and State have not been implementing the interagency wolf management program that is envisioned in the Tongass Forest Plan. Under the 2008 Tongass Forest Plan the State is empowered to play an active role in monitoring and managing wolf populations, but the State has neglected this role. The State and Forest Service inevitably need to implement an integrated strategy to manage deer and wolves. Currently however they are working at cross-purposes and without common understanding or common strategy.

### **The Governor's "One-Voice" policy undermines the scientific basis for the proposal.**

We've gained a great deal of respect for ADF&G biologists over the years. A wonderful thing about the agency is that it enables high-quality scientists to establish deep expertise in particular areas, over periods of many years. Their physical presence in rural Alaska earns our respect, and their open-door temperament earns our trust. ADF&G employs the current foremost expert on the Alexander Archipelago wolf, and other individuals who have done extensive research. From that perspective, the State is well-positioned to do good work managing our wildlife.

Notwithstanding our great respect for and trust of field biologists, we are concerned that the Governor's one-voice policy has poisoned the well of scientific knowledge coming out of ADF&G. It is hard to know what to make of ADF&G recommendations where they are subject to censorship and manipulation from political appointees. If they saw a concern for long-term sustainability, would that opinion be freely shared with the Board (and the public), or would the Governor's office strike that opinion because it would undermine the State's position on the A.A. Wolf ESA petition? We have seen this dynamic play out repeatedly in the last several years in the context of ADF&G review of USFS timber sales. The recent Logjam and Tonka timber sales are good examples of political interference with area biologist statements and conclusions. On the Tonka sale, for example, the knowledgeable ADF&G biologist commented that the proposed clearcutting posed a concern for the long-term viability of wolf populations. Subsequently, after DNR and other Governor-appointed staff got involved, that scientific opinion was retracted, even while the biologist stated he stood by his opinion. Worse, the State then actively prevented the Forest Service from publishing any statements attributed to individual ADF&G employees. Another example are the interagency (USFS/ ADF&G) wolf management plan meetings, where the most knowledgeable ADF&G scientists were not included because their scientific conclusions had not been adequately pre-cleared by the political managers.



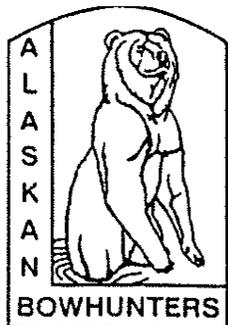
Given the Board's limited power over this factor, it is important at this phase for the Board to carefully inquire with ADF&G staff and experts to gain a correct understanding of the facts, and of the range of scientific opinion. Because a decision like this requires full public disclosure and involvement, if the Governor wants to pursue predator control then he should explicitly release his employees to offer their scientific opinions to the Board, without fear of reprisal and without pre-clearance by political appointees. The poacher Mr. Rossi is gone, at least, but the underlying attitude and policies that resulted in that debacle remain in place.

Cascadia will never be *happy* to see a wolf killed in the name of predator control, but we *are* willing to put emotions to the side where objective, ecological science points us in a different direction. Please appreciate that is only possible for people on different emotional sides of the issue to accept scientific conclusions where they are totally transparent and subject to peer review. In the interest of moving beyond the pointless yelling-past-each-other predator control debates of the past, the Board should demand from the Governor that he leave science to scientists, and remove the political barriers to a free marketplace of ideas.

Thank you for thoughtfully considering these comments.

Sincerely,

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# The Alaskan Bowhunters Association, Inc.

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Board Support Section  
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Please accept the following comments from the Alaskan Bowhunters Association for the Southcentral Region Board of Game meetings scheduled for Kenai March 15-19, 2013

**Proposal 130 – Support :** This is an interesting proposal as an alternative to either shortening the season or reducing the bag limit. This is worth considering only if ADF&G believes that harvest of black bear in unit 6 must be further restricted. It can be difficult to tell a black bear boar from a sow in the field. But it can be done most of the time. It would be a valuable lesson to increase hunters paying attention to sex of an animal before shooting. It might be difficult to enforce. However ethical hunters would comply with the regulation. It should reduce the take of sows and increase the take of boars, which in the long run will enhance the bear population (since boars may kill cubs).

**Proposals # 136-139 regarding 14C sheep-Take NO Action:** There has been significant reduction in the sheep population in unit 14C. There should be an area wide review of sheep populations and management in this area. If there is a need to reduce the harvest we would recommend giving more archery permits and fewer firearms permits. This would reduce the harvest while not restricting the opportunity to hunt. There is a long history of archery hunting for sheep in



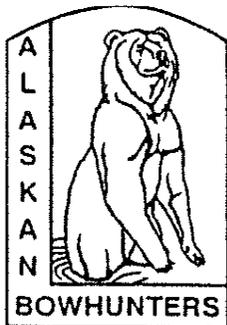
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unit 14C with a very low success rate for bowhunters. In spite of this low harvest rate, these archery hunts are very popular as indicated by the number of applicants for the archery permits. In the past the Alaskan Bowhunters Association has made proposals for increasing the number of archery permits but restricting the archery take to full curl only. We have also made proposals for an archery hunt before the regular firearms permit hunts. This would have a low harvest rate but would alert the sheep before the rifle hunters came into the mountains so the rifle success rate might also be reduced to the benefit of the sheep population while not reducing hunter opportunity. The point is that a thorough review of the sheep management in unit 14C (and the rest of Alaska sheep areas as well) would be appropriate. We recommend a sheep sub committee with all stakeholders represented be established to review the statewide sheep situation and take action next year.

**Proposal 140 – Support with amendments:** The winter of 2011/2012 caused a very high mortality on much of unit 8. This was verified but multiple reports of very low sightings of deer and low hunter success rates. We would recommend reducing the bag limit to two bucks only for both residents and nonresidents. With the current very low deer populations most hunters will hunt hard to take one buck. However, It is a long way to travel for most hunters to go to Kodiak. If they come from the lower 48 and have booked a 7day hunt, it would be nice if they could take a second buck if a larger buck showed up. Eliminating harvest of does should allow the deer population to rebound more rapidly and restore good hunting for everyone. Secondly we recommend Season dates from August 1 through November 30<sup>th</sup>. The harvest of deer when they have been driven to the beaches by snow in December has the potential to totally wipe out already low populations. In the past ADF&G has argued that large numbers of deer could not survive all winter on the beaches in heavy snow years. Therefore they should be maximally



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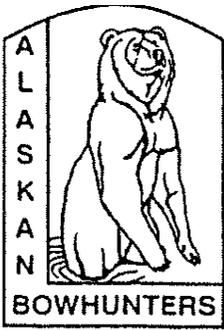


harvested when the winters are tough. That may be true when there are high numbers of deer on summer range. However when you already have 90% loss of deer then the 10% that are left would have less competition for the available food on the beaches so they would be more likely to survive.

**Proposal 142 – OPPOSE:** This is a bad regulation that serves no purpose except to make things more difficult for ethical hunters. There has been no evidence that wounded goats which are not recovered have ever been a biologic problem. The very organization that in the previous proposal recommended increasing the bag limit for goats to two is making this proposal on “ethical” grounds, not on any evidence of harm to a population by wounding loss. The Board should request concrete evidence of any past “emergency closures” caused specifically by wounded and lost goats. The Alaskan Bowhunters Association would support this regulation with the word “mortally” inserted in front of wounded. This leaves the decision of the seriousness of a wound up to the hunter. The ethical hunter will make the right choice. Please do not promulgate the bad regulations that already apply to bear to extend to goats or any other big game animals.

**Proposals 154, 155, 156 - Support:** We agree that, in areas where the Board determines that there needs to be an increased harvest of brown bear, taking of brown bear at bait sites is a reasonable thing to allow. The Board has already approved this in several other areas of the state. The only decision should be if the Board wishes to have an increased harvest of brown bear.

**Proposal 172 – oppose:** Any wolf represents a trophy to most hunters, even if it has a poor summer coat. Incidental take of wolves by sportsmen seeking other species has never impacted the overall wolf population. The State receives



# The Alaskan Bowhunters Association, Inc.

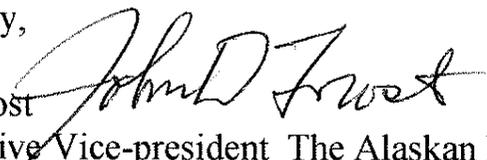
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significant income from selling wolf tags to nonresident sportsmen. This is the same proposal by the same individual that was rejected by the Board at Sitka (prop #20) and Wasilla (prop# 121) earlier this year. It should be rejected at this meeting for the same reasons.

Thank you for your consideration of our comments on these proposals.

Sincerely,

  
John Frost  
Legislative Vice-president The Alaskan Bowhunters  
Association



# CARING FOR KNEES

- KNEE INJURIES
- ARTHROSCOPIC SURGERY



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Alaska Dept. of Fish and Game  
Board Support Section  
PO Box 115526  
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Fax: 907-465-6094

March 1, 2013

I would like to submit the following personal comments to the Board of Game for consideration at their Southcentral Meeting in Kenai scheduled for March 15-19.

**Proposal # 40 - Strongly Support:** The winter of 2011/2012 caused devastating mortality of deer on much of Kodiak Island. I was one of the first hunters to notice such a severe drop in population that I felt moved to write a letter calling for emergency reduction in the bag limit and shortening of the season. (See the attached letter dated August 29, 2012.) There have subsequently been many reports of poor hunting due to low deer populations over much of Unit 8. Until deer populations rebound I believe that there should be a marked reduction in harvest of does and a shortening of the season. My recommendation would be a two bucks (only) season limit for both residents and non-residents. I would also recommend shortening the general hunting season by closing it the 1<sup>st</sup> of December. December snowstorms can push the few remaining deer to the beaches where they are concentrated and appear to be plentiful. High harvest rates in December can dramatically slow the regrowth of the deer population. Note that these changes in the general hunting season would not affect the federal subsistence hunts (they should also markedly reduce harvest levels as long term good management but probably won't). As a result there will still be substantial winter harvest of deer including does by subsistence hunters.



JDF-BOG page 2 March1,2013

**Proposal # 42 - Strongly Oppose:** There is no biologic justification for this proposal. Many things may affect goat populations, but wounding loss mortality has never been shown to have a meaningful influence on goat populations. The goat population on Kodiak is expanding (see proposal #41 by this same group). To my knowledge, there has never been an "emergency closure" due to wounding loss mortality. This is a "feel good" regulation promulgated by guides and closet anti-hunters. It discriminates against ethical hunters and does nothing to regulate the behavior of unethical hunters. It is the type of regulation in effect in Africa, Europe and high fence hunting preserves where landowners "own" the individual game animals as well. They wish to maximize their profit by in some cases charging double or more for a "wounded" animal. This type of regulation has never been part of the North American Model of Big Game Conservation. There is no evidence that this type of regulation, which has been applied to bear in six units of Alaska and Elk on Afognak, has ever made any improvement in game populations.

This issue goes back many years and recently (at your Sitka meeting) even the APHA who originally supported the regulation asked for it to be rescinded in unit 4.

It is important to emphasize that I am not encouraging wounding of animals. I support this regulation if it includes the word "mortally" in front of wounded. For further information I have submitted an article that I wrote and was published in Bow and Arrow Hunting Magazine, the June/July issue 2007 page 40.

Thank you for your consideration of my comments,

John D. "Jack" Frost

A handwritten signature in cursive script that reads "John D. Frost".



# CARING FOR KNEES

- KNEE INJURIES
- ARTHROSCOPIC SURGERY



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August 29, 2012

To: Alaska Department of Fish and Game, Alaska Board of Game  
From: John Frost MD, Legislative Vice President of Alaskan Bowhunters Association  
Subject: Serious winter kill of Sitka Blacktail deer on at least part of Kodiak Island

I am seriously concerned with the population of deer on Kodiak Island and believe that the Alaska Department of Fish and Game and the Board of Game should be looking very seriously at the situation and strongly consider an emergency reduction of the bag limit and shortening of the season for deer on Kodiak Island. There was apparently a high mortality as a result of the deep snows and prolonged cold of this last winter 2011/12.

I have hunted deer on Kodiak Island essentially every year since 1986. I have spent a minimum of one week but many years two or even three weeks in August and or September on Kodiak hunting deer by myself and with friends. I fly my own piper cub on floats and generally fly spotting deer at least some of the time and spend the rest of the time on the ground actually hunting. My hunting and area of observation has generally been south and west of a line from the head of Uyak Bay to the head of Three Saints Bay.

I have just returned from a five day hunt during which time I flew a total of five or six hours of actual scouting (deer survey) involving areas on Sitkinak Island, Aliulik Peninsula, Olga Bay region and Anvil Lake/Grant's Lagoon. This was not a scientific grid survey. However, I specifically flew areas where I have routinely seen and hunted deer in the past. I tried very hard to find deer for my own selfish desire to hunt them. This time of year the deer are red and in good light show up well against the green tundra. The areas that I hunt have very little brush. I flew on days with good sunlight and at time of the day when I would have expected to see deer.

I was shocked and saddened by how few deer I saw. I know that this last winter was a record for snowfall in Anchorage and that Kodiak had severe cold in late 2011 followed by heavy snows and a late cold spring. I expected to see some winter mortality. Nevertheless, I saw so few deer that I have been prompted to write this report.

Last year hunting on Sitkinak Island on one day I saw in excess of 70 deer. This year I flew the east part of Sitkinak Island and saw three deer in about thirty minutes with good light and on areas where there should have been lots of deer visible from the air. I did not bother to land and hunt because of so few deer.

Most of the Aliulik Peninsula has very few deer compared to prior years. There are a few deer here and there and I did see two different does that had twin fawns as well as a few does with single fawns. That was at least a little encouragement. I looked not only on the flats but also on the mountains where



typically I look for the more mature bucks. There just are not many deer in that area. The same was true of the Olga lakes area and Grants Lagoon area.

I do not claim that my survey is scientific and I hope that I missed seeing some deer that were there. However, I was looking hard for deer with a survey tool (Piper Super Cub) and 25+ years experience hunting deer in the summer on Kodiak.

I believe that for the sake of protecting the remaining deer on Kodiak Island and enhancing the recovery of the deer herd from this devastating winter that ADF&G and the Board of Game should be pro-active and declare an emergency reduction in the bag limit and shorten the deer hunting season on Kodiak this year. This should be done by emergency regulations effective immediately.

My suggestion would be a reduction in the bag limit to two deer and closure of the season November 30th instead of December 31st.

This reduction in bag limit and season length would show that ADF&G and the Board of Game are paying attention and taking some action. It would allow hunting to continue and not totally disrupt hunters who already have hunts scheduled, air taxis, charter boat operators, sporting goods businesses and others whose livelihoods revolve around deer hunting. However it would let hunters know NOT to expect great hunting this year. (I can promise that many hunters of deer on Kodiak will be very disappointed with their hunts this year.) The restrictions that I have suggested will protect some deer and allow a more rapid recovery of the deer herd for better hunting in the years to come. It would be especially disastrous if there is a heavy snow fall in December this year and the few remaining deer are driven to the beaches in December and are killed there by late season hunters. Because there are few deer left, those that are still there have a better chance of survival because there will be less competition for food on the beaches.

It may be that ADF&G in their wisdom knows that my concerns are only localized and do not reflect the situation in all of unit 8. I certainly hope that is true. I was sufficiently alarmed by what I witnessed to take the time to write this report and bring the situation to the attention of ADF&G and the Board of Game. I do know that when the King Salmon returns are markedly reduced the Board of Fish acts quickly to modify their regulations. For the good of the Kodiak deer and future deer hunting I believe it is critical that this situation be reviewed. Possibly even more severe restrictions are in order.

Thanks for your consideration,

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# Hit but LOST

An expert's view on the laws,  
rules and ethics of wounding

By Jack Frost



## Join me on a few hunts that we all wish had turned out differently.

**D**ecember, late archery season with 4 inches of snow on the ground; the old doe slips cautiously past your treestand. She has lived through several archery and firearms seasons and is constantly alert. You draw as she walks behind an evergreen tree. She stops, broadside, alert at 20 yards. At your shot, she bounds off and you believe you clearly see your arrow go over her. Later, when you get down to retrieve your arrow, you find some cut back hair in her tracks and a smear of blood on the fletching of your arrow. You follow her tracks in the snow and over the first 100 yards, find about a dozen drops of blood and then nothing more. After

slightly toward you. Your arrow hits solid bone on his shoulder with a loud "whack!" and you see very little penetration. The bear wheels and crashes off through the alders. After waiting several hours and getting back-up help, you and the guide cautiously follow the fairly good blood trail for nearly a mile. Then, after the second bed, there is no more blood and no indication of which way the bear went.

Alaska in October, and a billy goat is lying broadside on a ledge. He is 45 range-found yards away and your shot is a perfect double-lung hit. He staggers to his feet and, with the incredible toughness for which goats are known, staggers nearly 100 yards before plunging off a precipice and falling 1,000 feet into a glacial river below. He is washed away and never seen again.

In Africa, you are sitting in a hide at a water hole, when a \$4,000 (trophy fee) sable comes in to drink. It

from a previous season.

Indeed wild animals suffer many natural injuries in the normal course of rutting activities: fighting for dominance or getting poked by a barbed wire fence or a sharp stick while running through the woods. Animals can, and do recover from injuries. Superficial clean cuts from broadheads are especially likely to heal with no residual impairment of the animal.

The National Bowhunter Education Foundation teaches that recovery of wounded animals is a bowhunter's most important responsibility. All serious, ethical bowhunters that I know agree with this belief. When an animal has been hit, you must do everything in your power to retrieve it.

However, as in the examples above, there are times when the animal escapes in spite of everything that we can do. These examples may run the entire range—from animals so lightly wounded that they are not affected in any way, to animals clearly mortally wounded and lost.

Depending on where you are hunting, laws, landowner or guide rules, local customs and general hunting ethics may vary. Obviously it is your responsibility to know and observe all laws. This is not always easy in foreign countries and states and, to some extent, you must rely on what your guide tells you. However, you are ultimately responsible.

If the local rules of your guide or the landowner say that any animal on which there is any sign of blood must be considered taken, then you must know and abide by those rules. This is generally the case in most of Africa and Europe. Often times in those countries, if you hit an animal, your hunt is over and you pay the trophy fee, regardless of whether the animal is recovered or not. It is also generally the rule anywhere the animals are considered to be privately owned. It is just good business if you can charge two or more hunters trophy fees on the same animal. Also guides with more interest in the fees to be

## "Superficial clean cuts from broadheads are especially likely to heal with no residual impairment of the animal."

following her walking tracks for another 200 yards, you find that she is feeding on acorns.

The peak of the rut is November and, during this time when it is just getting dark, a nice buck comes by. Walking slowly, he passes within 15 yards. You shoot and hear a dull, hollow "thunk" instead of the click of an arrow hitting ribs. He humps up and walks off slowly. Wisely, you wait until the next morning to track him, but it rains during the night and you find no trail in the morning. Extensive ground search over the next few days fails to find the deer.

It's Alaska in September, and you are hunting brown bear in thick brush on a salmon stream. A nice bear comes splashing up the stream and draws broadside at about 25 yards. "Shoot!" your guide urgently whispers. As you come to full draw, the bear turns just

is incredible how quickly he whirls at the sound of the bowstring. Your arrow then skirts by his brisket. There is only blood on one blade and a smear on one of the fletching. Your PH and the government game tracker say the animal is essentially unharmed, but you still owe the trophy fee.

Unfortunately, as much as we hate to admit it, there are various scenarios where an animal is struck with an arrow and not recovered. In The Fort Ripley Wounding study done 10 years ago there was a 13 percent un-recovered wounded rate. This is actually a far lower rate than has been reported by anti-hunting groups' propaganda. It is not certain that any of those deer died. Some were probably lightly wounded and survived. There are numerous stories of animals being harvested with completely healed arrow wounds



generated from the hunt than with your success are happy to quit early and not have the work of caring for a trophy if you wound an animal. This may be shortsighted, as they may not get much return business.

This generally has not been the policy in North America. Here, we are ethically encouraged to diligently continue attempting to recover any animal believed to have been mortally wounded. Ethical hunters will leave no stone unturned to try to find an animal that they have hit solidly in the body cavity. Hunters will continue to hunt for that specific animal and will not try to shoot another animal, even after they have essentially given up all hope of recovery. Hunters will finish their season or hunt looking for that animal. If on a guided hunt, hunters will insist that their guides use every means at their disposal to help find the animal.

However, a lightly wounded or nicked animal in North America is another consideration. A 2-inch cut, 1/2-inch deep across an animal's back or brisket is nothing more than a valuable lesson to an animal to pay more attention when walking past a treestand. An animal will be more alert and less likely to be harvested than if it had never been shot at. A superficial cut does not remove an animal from the population and has no biologic effect. Therefore, a superficially wounded animal should not be counted against a person's bag limit.

Bowhunters, compared to gun hunters, are at a disadvantage when it comes to rules that say a wounded animal must be considered to be taken, regardless of how lightly it is wounded. This is because we shoot at short ranges with projectiles that we can see fly, and that we usually recover and inspect after we have shot. We are therefore more likely to know that we have superficially wounded an animal than is a rifle hunter who shoots at longer ranges with an invisible projectile that he never retrieves.

If a rifle hunter and his or her guide watch an animal that has been shot at run away without flinching or

falling down, they may agree that the hunter missed and not even go and inspect where the animal was standing when shot, or follow the escape route searching for blood. It is my belief that gun hunters *unknowingly* wound more game than bowhunters. So the gun hunter who doesn't realize that he or she has caused a superficial wound is rewarded by being allowed to continue to hunt, while the bowhunter who is aware of the superficial wound must stop hunting if that is the law or rule of the guide.

Several years ago in Alaska, one of our regulations was interpreted as meaning that if you even disturbed an animal while hunting you must consider it taken and count it as part of your bag limit. This would have meant that if you shot at eight ducks sitting on a pond, killed one and the other seven were disturbed and flew away that you had "taken" all of them and were in fact over your bag limit. This clearly ridiculous interpretation has been changed. But the Alaska Professional Hunters Association is currently lobbying to have it made the law that any animal wounded must be counted as "taken," regardless of how lightly it has been wounded.

This raises many concerns. Will guides encourage hunters to take marginal shots? Will hunters refuse to take reasonable shots and wait for only absolutely certain shots? Does this put the guide and the hunter in a conflicted situation? If an animal is hit, will the guide give up too easily and say the hunt is over? Can a guide call off a hunt say, of a brown bear on the second day of a (\$12,000 for 10 days in the field) hunt because a bear was slightly wounded, or does the hunter have the right to demand to stay and continue to hunt for the specific bear that he wounded? Under the Alaskan Guide Regulations, a guide must use every means at his disposal to attempt to recover a wounded animal. Does this mean that he must pull other assistant guides and their clients in to help you hunt for your wounded animal? What if a hunter wounds an animal in this season, counts it against his bag limit

and then the following season kills the same animal? Does it not count against his bag limit in the second season because he already tagged and paid for it in the first season?

There may be no absolute answers to some of these questions. Reasonable guides and reasonable hunters should be able to agree on the proper ethical decision to make in the vast majority of circumstances. When hunting alone you are honor bound to make the appropriate ethical and legal decision. I believe that some room must be left in the law for hunters to make some of their own decisions. When laws try to force ethics, no real good is served. Ethical, law-abiding hunters may be forced to quit hunting because they have drawn a few drops of blood from an animal. Meanwhile, unethical hunters may continue to wound animals and not bother to follow-up. They may just continue to hunt because, in reality, the chance of enforcing these types of regulations is very difficult.

Finally, it is important to say that I am in no way advocating or endorsing wounding animals. But, some animals will inevitably be wounded and lost. If they are mortally wounded they should legally and ethically be counted against your bag limit. If they are superficially nicked they should not be counted against your bag limit. Yes, there will always be a gray area. But in reality, that gray area is very narrow and it should be left up to the conscience of the hunter and his guide to determine the right actions. You should discuss these things with your guide before the fact and hope that the above scenarios never happen to you.

#### *Editor's Note:*

*Without a doubt, Dr. Jack Frost is one of the most experienced bowhunters living today. With a variety of bowhunting accomplishments under his belt, including taking the first Grand Slam on North American Wild Sheep and the North American Super Slam, he is well respected and renowned. We are pleased to have him report on this important and controversial topic. ←*



THE STATE  
of **ALASKA**

GOVERNOR SEAN PARNELL

Department of Natural Resources

Division of Parks & Outdoor Recreation  
Chugach State Park

18620 Seward Highway  
Anchorage, AK 99516  
Phone: 907.345.5014

February, 28 2013

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

Dear Board of Game,

The following recommendations are respectfully provided for some of the proposed changes to Southcentral Region hunting regulations currently under your consideration that may affect Chugach State Park:

**Proposals 133, 134 & 135** – The Park *recommends adoption* of all three of these proposals that reauthorize the antlerless moose hunts in various areas within Chugach State Park.

**Proposal 137** – The Park *opposes adoption* of this proposal. The proposal would expand Dall sheep hunting into areas of the park where the discharge of a firearm is specifically prohibited by regulation (i.e., the South Fork Eagle River, Ram Valley and Suicide Peaks). Within these proposed areas, a Special Park Use Permit would have to be applied for, justified and then issued by Chugach State Park.

**Proposal 138** – The Park *opposes adoption* of this proposal. The proposal would expand Dall sheep hunting into areas of the park where the discharge of a firearm is specifically prohibited by regulation (i.e., Rainbow Creek, McHugh Creek, Rabbit Creek, Campbell Creeks and the South Fork Eagle River). Within these proposed areas, a Special Park Use Permit would have to be applied for, justified and then issued by Chugach State Park.

**Proposal 139** – The Park *opposes adoption* of this proposal. The proposal would expand Dall sheep hunting into an area of the park where the discharge of a firearm is specifically prohibited by regulation (i.e., re-open Ram Valley as part of the DS123 Dall sheep hunt). Within this proposed area, a Special Park Use Permit would have to be applied for, justified and then issued by Chugach State Park.



In each of the Proposals 137-138 there is a request that would involve hunting sheep in areas that are currently closed by park regulation to the discharge of firearms. The areas closed to firearm discharge are within the front range of Chugach State Park, where park visitation is greatest. These areas are also more accessible to the public for sheep viewing. Presently, the only Special Use Permits issued for the discharge of firearm by Chugach State Park are in support of ADF&G Drawing Hunt DM666, which is the antlerless moose hunt that takes place within the Anchorage Management Area of Unit 14(c). A justification for issuing these permits is due to Alaska Department of Fish and Game's (ADF&G) determination that the moose population is responsible for habitat over-browsing and the desire to reduce human-wildlife conflicts as well as the potential moose-vehicle collisions. Since this hunt is restricted to antlerless moose, it does not involve the taking of "trophy" animals which are highly valued for viewing. Through a cooperative effort with ADF&G, several restrictions have been placed on the hunt to minimize potential conflicts between hunting and non-hunting pursuits in higher use areas. These include shotgun or muzzleloader only, the requirement of hunters to acquire hunter education and muzzleloader certification, demonstration of shooting proficiency, the attendance of an orientation class, daily notification requirement and limits to weekday hunting only.

Chugach State Park will continue to cooperatively work with ADF&G and the public, as has been the case in the past, to evaluate specific hunt recommendations when they conflict with park regulations in the statutory context of the legislation that established the park.

Thank you for your consideration of these comments. Please don't hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Harrison", with a long horizontal flourish extending to the right.

Tom Harrison  
Superintendent



February 28, 2013

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 1-907-465-6094

Dear Board Members:

I am strongly opposed Proposal 156 that would allow the killing of brown bears at black bear bait stations in intensive management areas in Units 15A and 15C. I urge you to vote "No" on this proposal.

Bear baiting is an archaic practice that habituates bears to human food and garbage making them more likely to get into trouble around people. This is very important especially in areas where we have high concentrations of people like the Russian River ferry crossing, were food conditioned bears could pose a threat to anglers and visitors and adjacent communities like Cooper Landing. It is bad enough that the state allows black bears to be killed over bait. The practice should not be extended to killing brown bears lured to bait stations.

Thirty-one other states have prohibited this unsporting method of killing bears. Let's not make the practice even more unpalatable by allowing brown bears to be killed over bait.

Thank you for considering my comments, please do not pass Proposal 156.

Sincerely,

Dave Bachrach  
P.O. Box 2828  
Homer, AK 99603



February 28, 2013

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 1-907-465-6094

Dear Board Members:

I support and urge you to pass and adopt Proposal 172.

It is unethical and inhumane to allow the killing of wolves while the pups remain dependent upon the pack. Also this has the potential to wipe out two or more generations at once. Additionally, the loss of the pups is not counted in harvest statistics, making accurate population estimates - and future management decisions - problematic.

Allowing the take of wolves during pup season is not a sound scientific, biological, ecological, or ethical method of managing this species.

Currently, hunting and trapping regulations in Southcentral are inconsistent. In some areas wolves may be killed before November 1, while pups remain dependent on their parents and the pack. In other areas hunting and trapping is legal after March 1, after mating has occurred and females may be pregnant.

Allowing the hunting and trapping of wolves between March 1 and November 1 means that two generations or more of a pack likely would be wiped out at once.

Dependent pups that do not survive are not counted, meaning that a substantially greater number of wolves is lost than is reflected in harvest statistics. This is unscientific and a very poor way to manage the wolf population.

Establishing a shorter, standardized season for wolves in Southcentral would have no financial impact on hunters and trappers, because wolf pelts are usually not in prime marketable condition before November.

Thank you for considering my comments.

Sincerely,

Dave Bachrach  
P.O. Box 2828  
Homer, AK 99603



February 28, 2013

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 1-907-465-6094

Dear Board Members:

I strongly support and urge you to pass and adopt Proposals 173 and 174. Bear snaring may be of some value to research scientists in a small controlled setting. However when used by the general public it is indiscriminate, inhumane and should not be allowed period.

Bear snaring is an extremely controversial method of killing animals. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its war on predators. Bear snaring has never been allowed in Alaska since statehood until the BOG approved an experimental program in 2008. Bear snaring should be banned in Alaska.

Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage the harvest of females.

Enforcement will be improbable, if not impossible for the Alaska State Troopers, who are already stretched thin.

Bear snaring can pose dangers to other consumptive users, hikers and their pets who may come upon a situation where one bear is caught while its siblings or mother remain free in the area, creating the very real possibility of severe injuries or fatalities. The baited traps also create food-conditioned bears, and animals which learn to associate food with humans are a danger to our communities.

Bears have cultural, economic and biological importance to Alaskans.

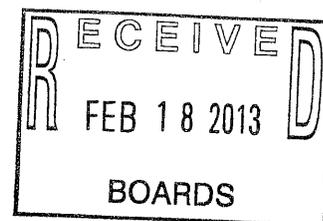
Live bears have a very high value as a tourism draw and a source of revenue. They are almost always cited as one of the "big three" species visitors come to Alaska to see.

Vote "Yes" on Proposals 173 and 174.

Thank you for considering my comments.

Sincerely,

Dave Bachrach  
P.O. Box 2828  
Homer, AK 99603



**PO Box 2850, Valdez, Alaska 99686**

Members of the Alaska Board of Game,

At a recent meeting of the Prince William Sound Charter Boat Association, members present voted unanimously to support Proposal 130, a proposal that promotes the harvesting of boar black bear in Prince William Sound.

Several of our members are Big Game Transporters and the concept, although untested, has the potential to offer a minor restriction with a significant gain. We realize that identifying a boar versus a sow is not easy, but we also feel it can be done a significant percentage of the time if hunters attempt to hunt boars. Our members already encourage the harvest of boars and this regulation allows us to show our clients that the State of Alaska also supports this concept. We are optimistic that this regulation would reduce the percentage the harvest of sow black bear by a measurable percentage and that over time would improve the sow population thus providing more opportunity to hunters.

As you are aware, black bear harvest in Unit 6D increased significantly with the opening of the road to Whittier - in the neighborhood of 100% increase. The jury is still out on whether this harvest can be sustained. We feel this is a perfect time to try this regulation and see if it will work. If it does, it may prevent further restrictions on hunters in Unit 6D and will be an added tool in your box of tools to reduce/improve hunting opportunities for all. We have watched the regulation changes you have made to reduce bear populations in other units, why not try a regulation that has potential to improve bear populations in a unit that has seen several restrictions to limit harvest. This proposal seems like a win, win to us.

Thank you for taking the time to read our letter and thank you for the service to all,

Sincerely,

Mel Grove  
President  
Prince William Sound Charter Boat Association  
PO Box 2850  
Valdez, AK 99686