

**ALASKA BOARD OF GAME**  
**Southcentral Region Meeting**  
**Anchorage, Alaska**  
**March 13-17, 2015**  
*On Time Public Comment Index*

Dori Hollingsworth .....	PC001
Pere Davidson .....	PC002
Micah Miller .....	PC003
Jeffrey Davis .....	PC004
James M. McCann .....	PC005
Lisa Green.....	PC006
Theodore Bryant .....	PC007
Ken Green .....	PC008
Mike Chihuly .....	PC009
Penny Nixon.....	PC010
Maureen Peterson.....	PC011
Dorian Traylor .....	PC012
Nick Humphreys .....	PC013
Daryl Hollingsworth .....	PC014
Dennis Ackerman.....	PC015
Randy K. Rogers.....	PC016
Rod Berns.....	PC017
Chris Brehmer .....	PC018
David Ellision .....	PC019
Duncan Harrison .....	PC020
Jim Anderson .....	PC021
Russell Biggs .....	PC022

**ALASKA BOARD OF GAME**  
**Southcentral Region Meeting**  
**Anchorage, Alaska**  
**March 13-17, 2015**  
*On Time Public Comment Index*

Denise Abel.....	PC023
Theresa Bostwick.....	PC024
John Haddix .....	PC025
Barry Santana.....	PC026
Kate [Unkown].....	PC027
Janice Troyer.....	PC028
Jeff Schmitz .....	PC029
Mark Miraglia .....	PC030
MaryBeth Printz.....	PC031
W. Withrow.....	PC032
Stephan Hyams .....	PC033
Todd Smith.....	PC034
William Petrik.....	PC035
Andrea Lang.....	PC036
Dan Brandvold .....	PC037
Gail Boerwinkle .....	PC038
John M. Miller .....	PC039
John Rose.....	PC040
Jonathan Galin .....	PC041
Kyle Drasky .....	PC042
Jeremiah Prater.....	PC043
Marty and Annette Cordano.....	PC044

**ALASKA BOARD OF GAME**  
**Southcentral Region Meeting**  
**Anchorage, Alaska**  
**March 13-17, 2015**  
*On Time Public Comment Index*

Lance Raymore .....	PC045
Eric Lee .....	PC046
Madeleine Grant.....	PC047
Scott Breitsprecher.....	PC048
Andrew Scrivo .....	PC049
Warren Buck Brown .....	PC050
William Rice & Ann Williams .....	PC051
National Park Service .....	PC052
Denise Elder.....	PC053
USFWS Office of Subsistence Management.....	PC054
Donald Lietzau.....	PC055
Lance Kramer.....	PC056
Greg Jennen .....	PC057
Western Arctic Caribou Herd Working Group.....	PC058
Caren della Cioppa.....	PC059
David Hart.....	PC060
Janice Tower .....	PC061
Steve Colt.....	PC062
Jared Cummings.....	PC063
Brian Looney .....	PC064
Alaska Trappers Association .....	PC065
Patricia Dicraiker .....	PC066

**ALASKA BOARD OF GAME**  
**Southcentral Region Meeting**  
**Anchorage, Alaska**  
**March 13-17, 2015**  
*On Time Public Comment Index*

Jessie Alloway .....	PC067
Bill Sherwonit .....	PC068
Michael Mandregan .....	PC069
Chugach State Park Citizens' Advisory Board .....	PC070
Northway Village Council .....	PC071
Julie Sadoris .....	PC072
Debrah Carlson .....	PC073
Tom McReynolds.....	PC074
Kent Bowman .....	PC075
JD Batove.....	PC076
Ken Green .....	PC077
Kay Thomas .....	PC078
Cherie Northon.....	PC079
Susan Serna.....	PC080
Gordon Jones .....	PC081
Renee Blake .....	PC082
John Kaiser.....	PC083
Keith Brownsberger .....	PC084
Colin Lindsey .....	PC085
Bryan Judge .....	PC086
Marybeth Holleman .....	PC087
Thomas Eley .....	PC088

**ALASKA BOARD OF GAME**  
**Southcentral Region Meeting**  
**Anchorage, Alaska**  
**March 13-17, 2015**  
*On Time Public Comment Index*

Municipality of Anchorage .....	PC089
Tom Honer .....	PC090
Laura Senddon .....	PC091
Jed Zimmerman .....	PC092
Louis Kane .....	PC093
Jack Reakoff.....	PC094
Maniilaq Association .....	PC095
Maxine Franklin.....	PC096
Paul Chanek .....	PC097
Jeffrey Kramer .....	PC098
Steven Aubry .....	PC099
Martha Wavrin.....	PC100
Johnell Olsson.....	PC101
Martha McGinnis .....	PC102
Craig Doser .....	PC103
Roger Martinez .....	PC104
Judy Kimminau.....	PC105
Lynn Mitchell.....	PC106
Ken & Kate Green .....	PC107
Joanie Martinez.....	PC108
Jos Bakker.....	PC109
Center for Biological Diversity.....	PC110

**ALASKA BOARD OF GAME**  
**Southcentral Region Meeting**  
**Anchorage, Alaska**  
**March 13-17, 2015**  
*On Time Public Comment Index*

Kenneth Wilkinson .....	PC111
Al Barrette.....	PC112
Friends of the Anchorage Coastal Wildlife Refuge.....	PC113
Dena Selby .....	PC114
Robert Archibald & Roberta Highland .....	PC115
Kachemak Bay Conservation Society.....	PC116
Alaska Backcountry Hunters & Anglers.....	PC117
Jim Broderick.....	PC118
Alaska Bowhunters Association .....	PC119
Kachemak Bay State Parks Citizens Advisory Board .....	PC120
Julian Mason .....	PC121
Carolyn Brodin.....	PC122
David Armstrong .....	PC123
Diane McRoberts Powers .....	PC124
Dianna Whitney .....	PC125
Duncan Keith .....	PC126
Jacky Graham.....	PC127
Janette Cadieux .....	PC128
Rachel Hatcher .....	PC129
Sylve Montalbo.....	PC130
Theo Lexmond.....	PC131
Jennifer McCombs.....	PC132

**ALASKA BOARD OF GAME**  
**Southcentral Region Meeting**  
**Anchorage, Alaska**  
**March 13-17, 2015**  
*On Time Public Comment Index*

Mike Daigneault.....	PC133
Michael Hawley .....	PC134
Matthew Keith .....	PC135
Lynne Doran .....	PC136
Laura Ashlock.....	PC137
William Clay.....	PC138
Jason Bickling.....	PC139
Guy Sachette .....	PC140
Yvette Galbraith.....	PC141
Anne Hope .....	PC142
Linda Feiler.....	PC143
Virginia Morgan.....	PC144
Sandra Holsten .....	PC145
B Atkinson .....	PC146
Daniel Jirak.....	PC147
Northwest Arctic Borough.....	PC148
Stephen Bartell.....	PC149
Tasha Jeffords .....	PC150
Keith Balfourd .....	PC151
Terry Overly.....	PC152
Matt Soloy.....	PC153
Darrin Anderson.....	PC154

**ALASKA BOARD OF GAME**  
**Southcentral Region Meeting**  
**Anchorage, Alaska**  
**March 13-17, 2015**  
*On Time Public Comment Index*

Robert Holbrook .....	PC155
Kathryn Recken .....	PC156
Dominic Bauer .....	PC157
Todd Pace.....	PC158
Robert Cassell .....	PC159
Kneeland Taylor.....	PC160
Wayne Hall .....	PC161
Martha Story .....	PC162
David Story .....	PC163
Diana Stone Livingston.....	PC164
Lance Kronberger .....	PC165
Marilyn Houser .....	PC166
Alaska Professional Hunters Association .....	PC167
Bari Cabana.....	PC168
Dana Bertolini.....	PC169
Kevin Asher .....	PC170
Tom Lessard.....	PC171
Mark Corsentino .....	PC172
Janice Crocker.....	PC173
Michael Kistler.....	PC174
Yolanda Dela Cruz.....	PC175
Ethan Williams.....	PC176

**ALASKA BOARD OF GAME**  
**Southcentral Region Meeting**  
**Anchorage, Alaska**  
**March 13-17, 2015**  
*On Time Public Comment Index*

April Warwick .....	PC177
Luke Graham .....	PC178
Colt Foster.....	PC179
Mark Luttrell.....	PC180
Bruce Graham .....	PC181
Stefanie [Unknown] .....	PC182
Dave Sullivan.....	PC183
Marilyn Houser .....	PC184
Lesa Miller .....	PC185
Kris Malecha.....	PC186
John Campbell .....	PC187
Mark Stiller .....	PC188
JoeRay Skrha .....	PC189
Jake Jacobsen.....	PC190
Greg Waisanen.....	PC191
Greg Pepperd .....	PC192
Darcy Davis .....	PC193
Dan Montgomery .....	PC194



**From:** [Johnell Wulff](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Proposals 170, 180, 181  
**Date:** Wednesday, February 25, 2015 6:17:59 PM

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Dear Alaska Board of Game:

I'm writing you today to express my opinion on some of your upcoming proposals. I have been to your beautiful state four times and am planning my next visit for 2016. I hope that you consider my opinions because - if not - I will not spend tourism dollars in your state.

I have been to Kincaid Park and have seen the moose. The park is beautiful and it was a wonderful time for me. Allowing any hunter, even a disabled hunter, to hunt in a well-traveled, busy park with moose who have been habituated to humans is a very bad concept. It makes no sense and it will limit travel dollars to Anchorage and this park. It will also endanger others - regardless of the precautions. If you allow this hunt to continue, it will not only endanger people, it will kill gentle animals, we have conditioned to not fear humans. Consequently, I, and other like minded visitors and constituents, will come to protest this inhumane proposal. You cannot allow this!

In addition, I also visit the great state of Alaska to observe and cohabitate with your brown bears in the Katmai National Park and Kenai Peninsula. I don't understand why, each year, you want to loosen restrictions and open up more hunting. I understand that hunting associations may lobby you but you need to consider that many of us come to Alaska to enjoy your wildlife, not hunt and kill it. Please pass proposal 170, 180 and 181. Again, as a tourist, I spend my money to enjoy the moose, brown bears, and a variety of other wildlife. My understanding is allowing a continued decline in the Kenai brown bear population is inconsistent with USF&WS's legal mandates, which include ensuring opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography.

Please consider my opinion and act accordingly. I appreciate your consideration.

Sincerely,  
Johnell Olsson  
Vail, Colorado  
303-618-2148



**From:** [Margaret McGinnis](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Proposals 170, 180, 181, 150  
**Date:** Wednesday, February 25, 2015 5:11:36 PM

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### ***I am writing to support Proposals 170, 180 and 181***

- The brown bears are an isolated population, have low reproductive potential and are difficult to monitor (population studies in heavily forested regions are extremely difficult and expensive), brown bear management on the Kenai requires a very conservative approach.
- The 2013 and 2014 mortality rates for female bears are alarming, and clearly unsustainable. If the state's liberal harvest quotas for sport hunters remain in effect, the area's bear population will decline to a point where neither hunters nor non-consumptive users will be able to spot bears.
- Notwithstanding recent years' excessive mortality rates, the population was already at a low density compared to other coastal brown bear populations. Continued decline will result in substantial long-term damage to the Peninsula's ecosystems.
- The USF&WS proposal includes stricter harvest limits in the Kenai's "back country". These are the most easily viewed bears - those that live closest to areas easily accessible to visitors, photographers and wildlife watchers. Continued substantial population losses among these bears will be a loss for the area's tourism industry.
- Any continued decline in the Kenai brown bear population is inconsistent with USF&WS's legal mandates, which include ensuring opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography.

### ***Proposals 180 and 181***

- The Cooper Landing, Seward and Moose Pass areas are world-famous, year-round meccas for family-oriented outdoor recreation. \
- Traps set adjacent to multi-use trails and facilities are dangerous to pets and small children. Such trapping is clearly incompatible with routes designed to be easily accessed by families with children and dogs.



The proposed setback areas are limited in scope and clearly delineated. Such regulation would be easily enforceable by wildlife troopers.

- Such regulations clearly specifying no trapping areas would go a long way to eliminate what can be emotional and unpleasant conflicts between recreational users and trappers - a "win-win" for both groups.
- It is inequitable that the activity of just one user group - trappers - deters people partaking in many other activities from safely enjoying multi-use public facilities and trails. Nothing in the proposals restrict trappers from simply placing traps beyond the setback.

### ***I am opposed to Proposal 150***

- A heavily-used park such as Kincaid is incompatible with a moose hunt, even if the hunt is very limited in scope. It is disingenuous to initiate a sport hunt in the name of public safety.
- The current estimated moose population in the park is not excessive. Most of the moose are habituated to sharing the park with a wide variety of recreational users.
- Increased public education focused on ways to avoid moose encounters, rather than killing most of the moose, is a much more appropriate means of preventing conflicts.
- Many Anchorage residents - likely a majority - value Kincaid's moose and accept their presence when they recreate in the park. Moose thriving in a city park add to Anchorage's unique character and lifestyle.
- If a problem moose is identified and needs to be removed, trained wildlife biologists are best equipped to deal with it, not sport hunters randomly targeting all cow moose. Utilizing readily available professional wildlife personnel would be much easier, safer, and result in minimal disruption to public use of the park.



**From:** [Craig Doser](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** proposals before the board of game  
**Date:** Wednesday, February 25, 2015 3:59:33 PM

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Dear Sir or Madam:

I am a Kenai Borough resident living in the Soldotna area, and I support proposals 170, 180, & 181. I oppose proposal 150.

Regarding 170:

I support proposal 170 to restrict brown bear hunting on the Kenai Peninsula.

The data available is clear that the 2012-2013 season loss of brown bear sows has and will reduce the brown bear population adversely for years to come. Our brown bear population already was at a low density compared to other Alaskan coastal brown bear populations prior to this loss brought about by the decision to extend the season that year by the Alaska Department of Fish & Game. This population is already adversely affected by ecosystem disruption from the burgeoning population density of the Homo sapiens population on the peninsula, road kills, and killings during human-bear encounters. Using U.S. census data from 2011, it seems that 15% of the Alaska resident population is determining the management policies over the wishes of the remaining 85% of us. We live here also, pay our taxes as well, and expect that our voice is heard over the hunting minority. We expect that Alaska policy makers will do their jobs and respect the law including the US Fish & Wildlife's legal mandate "to ensure opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography". It makes considerable more sense to use my tax dollars to enforce existing policies and develop additional bear-human safety policies and education rather than driving the extinction of yet another remarkable species for the wishes of a small minority. Clearly our ecosystem and others are changing and "traditional" notions of living in Alaska are not consistent with all the data we now have regarding the health of a myriad of wild animal populations. Additionally, "traditional" notions have no role in rational management strategies to ensure the current and future health of these populations. We do not actually live in a Jack London novel or on a reality TV show about Alaskan life, written by a screen writer from California. It's time to wake up and face current realities and preserve what we have left.

Where is the democracy of allowing a minority view to prevail?

Regarding 180 & 181:

I support proposals 180 & 181 to restrict trapping beyond a 250 foot setback adjacent to public roads, multi-use trails, and recreation facilities near Cooper Landing, Moose Pass, and Seward.

My family lives in a rural area on the Kenai Peninsula. We frequently hike, cycle, ski, berry-pick, and cut firewood with our family dog on and near our local trail systems including the affected areas.

Again, an even more significant minority of Alaskan residents, less than 0.5% are determining policy for those of us who hike, bike, ski, photograph, and marvel at the remarkable animals that attempt to survive in Alaska and have existed here for millions of years, long before human evolution even began. We constantly worry that our pets will become caught or killed in traps. We have already had one dog maimed in a snare, suffering with lifelong pain and disability. Clearly a 250 foot set-back for a trap is a small price to pay for this fringe minority of Alaskans to continue what in my opinion is a very cruel and un"sportsmanlike" method of cruelly killing an animal plus it risks the safety of children and family pets.

Where is the democracy of allowing a minority view to prevail?

Regarding proposal 150:

I oppose proposal 150 to allow moose hunting in Kincaid Park by disabled people or anyone.

My family uses the Anchorage trail systems including Kincaid Park frequently and year round. We hike, cycle, ski, photograph wildlife (moose particularly) and bring our dog with us. We bring tourists/family visitors to Kincaid Park for cycling, hiking, and animal viewing. I also am an Emergency Physician, and I find it remarkable that this proposal to discharge rifles within a city park has been able to gain any traction at all! The risk of a gun shot wound while enjoying a public trail system never crossed my mind as a possibility in Anchorage unless it was due to an



assault. Disguising proposal 150 as concern for disabled people, allowing them to hunt is unconscionable. An occasional moose human incident is a far smaller risk than allowing the use of firearms in a populated area. It is claimed that access will be restricted during the hunt. The number of Anchorage moose is actually declining, so it is less of a problem for this habituated population. Educating trail users regarding avoidance of altercations with moose is considerably more sensible in order to reduce human or moose injuries. Proposal 150 would restrict the use of these trail systems by a majority of Alaskans and tourists during the proposed hunt. Those of us who live and recreate in Alaska are well aware of the risks and accept the fact that this is not Disneyland, and that we always are at some risk when we enjoy the Alaskan environment. That's why we live here isn't it?

Sincerely,

Craig Doser



**From:** [Roger Martinez](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Kenai borough citizen comment on proposals 170, 180, 181, & 150  
**Date:** Wednesday, February 25, 2015 2:13:52 PM

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I am a Kenai Borough resident living in the Moose Pass area, and I support proposals 170, 180, & 181. I oppose proposal 150.

Regarding 170:

I support proposal 170 .

The data available is clear that the 2012-2013 season loss of brown bear sows has and will reduce the brown bear population adversely for years to come. Our brown bear population already was at a low density compared to other Alaskan coastal brown bear populations prior to this loss brought about by the decision to extend the season that year by the Alaska Department of Fish & Game. This population is already adversely affected by ecosystem disruption from the burgeoning population density of the Homo sapiens population on the peninsula, road kills, and killings during human-bear encounters. Using U.S. census data from 2011, it seems that 15% of the Alaska resident population is determining the management policies over the wishes of the remaining 85% of us. We live here also, pay our taxes as well, and expect that our voice is heard over the hunting minority. We expect that Alaska policy makers will do their jobs and respect the law including the US Fish & Wildlife's legal mandate "to ensure opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography". It makes considerable more sense to use my tax dollars to enforce existing policies and develop additional bear-human safety policies and education rather than driving the extinction of yet another remarkable species for the wishes of a small minority. Clearly our ecosystem and others are changing and "traditional" notions of living in Alaska are not consistent with all the data we now have regarding the health of a myriad of wild animal populations. Additionally, "traditional" notions have no role in rational management strategies to ensure the current and future health of these populations. We do not actually live in a Jack London novel or on a reality TV show about Alaskan life, written by a screen writer from California. It's time to wake up and face current realities and preserve what we have left.

Where is the democracy of allowing a minority view to prevail?

Regarding 180 & 181:

I support proposals 180 & 181 to restrict trapping beyond a 250 foot setback adjacent to public roads, multi-use trails, and recreation facilities near Cooper Landing, Moose Pass, and Seward.

My family lives in a rural area in the Moose Pass Area. We frequently hike, cycle, ski, berry-pick, and cut firewood with our family dog on and near our local trail systems. Again, an even more significant minority of Alaskan residents, less than 0.5% are determining policy for those of us who hike, bike, ski, photograph, and marvel at the remarkable animals that attempt to survive in Alaska and have existed here for millions of years, long before human evolution even began. We constantly worry that our pets will become caught or killed in traps. We have already had one dog maimed in a snare, suffering with lifelong pain and disability. Clearly a 250 foot set-back for a trap is a small price to pay for this fringe minority of Alaskans to continue what in my opinion is a very cruel and un"sportsmanlike" method of cruelly killing an animal plus it risks the safety of children and family pets.



Where is the democracy of allowing a minority view to prevail?

Regarding proposal 150:

I oppose proposal 150 to allow moose hunting in Kincaid Park by disabled people or anyone.

My family uses the Anchorage trail systems including Kincaid Park frequently and year round. We hike, cycle, ski, photograph wildlife (moose particularly) and bring our dog with us. We bring tourists/family visitors to Kincaid Park for cycling, hiking, and animal viewing. I also am an Emergency Physician, and I find it remarkable that this proposal to discharge rifles within a city park has been able to gain any traction at all! The risk of a gun shot wound while enjoying a public trail system never crossed my mind as a possibility in Anchorage unless it was due to an assault. Disguising proposal 150 as concern for disabled people, allowing them to hunt is unconscionable. The occasional moose human incident is a far smaller risk than allowing the use of firearms in a populated area even if it is claimed that access will be restricted during the hunt. The number of Anchorage moose is actually declining, so it is less of a problem for this habituated population. Educating trail users regarding avoidance of altercations with moose is considerably more sensible in order to reduce human or moose injuries. Proposal 150 would restrict the use of these trail systems by a majority of Alaskans and tourists during the proposed hunt. Those of us who live and recreate in Alaska are well aware of the risks and accept the fact that this is not DisneyLand, and that we always are at some risk when we enjoy the Alaskan environment. That's why we live here isn't it?

Sincerely,

Roger Martinez, M.D.  
P.O. Box 222  
Moose Pass, AK 99631



**From:** [Judy Kimminau](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Commentary on proposed amendments  
**Date:** Wednesday, February 25, 2015 8:18:17 AM

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Dear Alaska Board of Game:

I'm writing you today to express my opinion on some of your upcoming proposals. I have been to your beautiful state four times and am planning my next visit for 2016. I hope that you consider my opinions because - if not - I will not spend tourism dollars in your state.

I have been to Kincaid Park and have seen the moose. The park is beautiful and it was a wonderful time for me. Allowing any hunter, even a disabled hunter, to hunt in a well-traveled, busy park with moose who have been habituated to humans is a very bad concept. It makes no sense and it will limit travel dollars to Anchorage and this park, it will also endanger others - regardless of the precautions. If you allow this hunt to continue it will endanger people and it will kill gentle animals, I will come onsite and protest. You cannot allow this.

I come to Alaska to see your brown bears and I don't understand why, each year, you want to loosen restrictions and open up more hunting. I understand that hunting associations may lobby you but you need to consider that many of us come to Alaska to enjoy your wildlife, not hunt and kill it. Please pass proposal 170, 180 and 181.

Again, as a tourist, I spend my money to enjoy the brown bears. My understanding is allowing a continued decline in the Kenai brown bear population is inconsistent with USF&WS's legal mandates, which include ensuring opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography.

Please consider my opinion and act accordingly. I appreciate your consideration.

Sincerely,

Judy Kimminau  
1118 Fillmore St.  
Denver, CO 80206  
720-204-2044



**From:** [Lynn Mitchell](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Proposals 180 and 181  
**Date:** Thursday, February 26, 2015 11:00:34 PM

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Members of the Board of Game:

I adamantly support Proposals 180 and 181 establishing designated setbacks for trapping activity in specific areas. The population of the State of Alaska is becoming more and more diverse, and the Board of Game needs to acknowledge that users of trails, overlooks, roads, etc. should not be "forced" to become an unintended participant in one user's activity - that of the trappers. Most of us who choose to hike, ski, bike, run, ride horses, geo-cache, etc., etc. DO NOT want to become either viewers, or sadly, victims of the activity of trappers. This one user group - trappers - is affecting a multitude of other user groups. Hikers do not force other users to hike; bikers do not force other users to bike; on it goes. However, unethical trappers who have no force of law to prohibit their unethical behavior DO force other user groups to either "witness" their activities within eyesight of popular trails and/or suffer the consequences of their family pets becoming the unintended victims of these landmines or death traps. I reside in the Mat Su Borough, and we are experiencing the same conflicts. We have reports of trappers placing their traps within residential neighborhoods, on private property without the owners' permission, along trails in popular parks that were originally established as skiing and running trails, and the most alarming of all...school property. The consequences have been both dire and expensive for the owners who have had pets (aka family members) killed or maimed.

An avalanche of public awareness and criticism is building. You have an opportunity to make a change that will be looked upon by future generations of Alaskans as the right move at the right time. Please make the correct and ethical decision - the decision that in fact supports the ADFG guidelines: "avoid high-use recreational areas; avoid situations where you might catch a domestic dog or cat, such as near homes or trails frequently used by hikers, skijorers, ..."

Lynn Mitchell, CPA, Founder of Alaska Safe Trails



**From:** [Ken and Kate Green](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Proposals 170, 180, 181, 150  
**Date:** Thursday, February 26, 2015 10:04:20 PM

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Kenai Lake

## **I SUPPORT Proposal 170**

Submitted by managers at the U.S. Fish & Wildlife Service Kenai National Wildlife Refuge this proposal seeks to address the steep decline in the female brown bear population on the Kenai Peninsula by restricting hunting seasons and lowering harvest limits. New harvest limits would be based not just on the number of bears killed by hunters but on total Human Caused Mortality (HCM) which includes both hunting and bears killed in defense of life and property.

- Because these brown bears are an isolated population, have low reproductive potential and are difficult to monitor (population studies in heavily forested regions are extremely difficult and expensive), brown bear management on the Kenai requires a very conservative approach.
- The 2013 and 2014 mortality rates for female bears are alarming, and clearly unsustainable. If the state's liberal harvest quotas for sport hunters remain in effect, the area's bear population will decline to a point where neither hunters nor non-consumptive users will be able to spot bears.
- Notwithstanding recent years' excessive mortality rates, the population was already at a low density compared to other coastal brown bear populations. Continued decline will result in substantial long-term damage to the Peninsula's ecosystems.
- The USF&WS proposal includes stricter harvest limits in the Kenai's "back country". These are the most easily viewed bears - those that live closest to areas easily accessible to visitors, photographers and wildlife watchers. Continued substantial population losses among these bears will be a loss for the area's tourism industry.
- Any continued decline in the Kenai brown bear population is inconsistent with USF&WS's legal mandates, which include ensuring opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography.



## I SUPPORT Proposals 180 and 181

Together these proposals would restrict trapping within a 250-foot setback adjacent to specifically designated public roads, multi-use trails and recreation facilities near the communities of Cooper Landing, Seward and Moose Pass on the Kenai Peninsula. (Proposal 180 designates the specific closure areas for Cooper Landing, and Proposal 181 designates the areas for Seward and Moose Pass.)

- The Cooper Landing, Seward and Moose Pass areas are world-famous, year-round meccas for family-oriented outdoor recreation.
- Traps set adjacent to multi-use trails and facilities are dangerous to pets and small children. Such trapping is clearly incompatible with routes designed to be easily accessed by families with children and dogs.
- The proposed setback areas are limited in scope and clearly delineated. The regulation would be easily enforceable by wildlife troopers.
- Such regulations clearly specifying no trapping areas would go a long way to eliminate what can be emotional and unpleasant conflicts between recreational users and trappers - a "win-win" for both groups.
- It is inequitable that the activity of just one user group - trappers - deters people partaking in many other activities from safely enjoying multi-use public facilities and trails. Nothing in the proposals restrict trappers from simply placing traps beyond the setback.

## I OPPOSE PROPOSAL 150

This proposal would establish a drawing permit hunt for up to 10 antler-less moose (cows) in Kincaid Park, a large and very heavily used park within the Municipality of Anchorage.

- A heavily-used park such as Kincaid is incompatible with a moose hunt, even if the hunt is very limited in scope. It is disingenuous to initiate a sport hunt in the name of public safety.
- The current estimated moose population in the park is not excessive. Most of the moose are habituated to sharing the park with a wide variety of recreational users.
- Increased public education focused on ways to avoid moose encounters, rather than killing most of the moose, is a much more appropriate means of preventing conflicts.
- Many Anchorage residents - likely a majority - value Kincaid's moose and accept their presence when they recreate in the park. Moose thriving in a city park add to Anchorage's unique character and lifestyle.
- If a problem moose is identified and needs to be removed, trained wildlife biologists are



best equipped to deal with it, not sport hunters randomly targeting all cow r  
Utilizing readily available professional wildlife personnel would be much eas  
result in minimal disruption to public use of the park



**From:** [Joanie Martinez](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Alaska Board of Game Proposals 170, 180, 181  
**Date:** Thursday, February 26, 2015 8:30:40 PM

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Dear Board of Game members,

I live in the Moose Pass area, and I support proposals 170, 180, & 181. I oppose proposal 150.

I support proposal 170 to restrict brown bear hunting on the Kenai Peninsula.

It's apparent that the 2012-2013 season loss of female brown bears has already significantly reduced the brown bear population when that population was already low compared to other Alaskan coastal brown bear populations. And it appears the low count was caused by the Alaska Department of Fish & Game's extending the hunting season prior to that. The numbers of bears and other wildlife species are already severely affected by the loss of their habitat due to the growing human population on the Kenai Peninsula.

What seems especially unfair is, according to U.S. Census data, a small percentage of Alaskans are deciding management policies of wildlife - regardless of the wishes of the majority of us. Hunters and trappers are a MINORITY of the population here in Alaska; the majority of us would prefer to see the animals ALIVE in wild places. Where is OUR voice in this, and why are WE not represented???

Aside from the pleasures that many Alaskans receive from viewing and photographing wild animals in their natural habitats, thousands of tourists make the pilgrimage to Alaska every year for precisely the same reason.

I support proposals 180 & 181 to restrict trapping beyond a 250 foot setback adjacent to public roads, multi-use trails, and recreation facilities near Cooper Landing, Moose Pass, and Seward.

I live in the Moose Pass area and frequently hike, cycle, snowshoe, ski, berry-pick, and cut firewood near the trail systems here as well as Seward and Cooper Landing - and I always have my dog along.

And once again, an even MORE significant minority of Alaskan residents, less than 0.5%, are determining policy for the rest of us. When only a very SMALL number of Alaskans wish to trap and kill the animals, the greater MAJORITY of us would prefer to see and photograph them alive and well in their wild homes. Aside from that, I am constantly concerned that my dog will end up in a trap. This has happened to not only another dog of mine in the past, but to a neighbor's dog as well. Trapping in the first place is a CRUEL and BARBARIC way to secure an animal and should be outlawed simply because of THAT! How can we, as a civilized society continue to practice such torture of an animal!?

I oppose proposal 150 to allow moose hunting in Kincaid Park by disabled people or anyone.

My family and I frequently use the Kincaid Park and other Anchorage trails. We hike, cycle, and ski the trails, and we photograph the wildlife. We have played on the Kincaid Park trails dozens and dozens of times during our 25-year Alaska residency, and have never had a problem with a wild animal encounter. Moose numbers are declining in the Anchorage area as on the rest of the Kenai Peninsula, and it seems utterly unnecessary to contribute to this decline under the guise of protecting the public from a supposed danger from their presence.



In fact, in order to completely eliminate any “danger” of moose, we would have to eliminate them altogether, wouldn't we!? Why can't we instead launch an effective campaign to educate people about how to behave in the presence of wildlife. Also, by putting the issue of hunting on a pedestal, that is closing the park for a month so that a handful of people can attempt to kill a moose, does not represent a democratic system, as the great majority of Alaskans have no interest in hunting!

Joanie Martinez  
Box 222  
Moose Pass, Alaska



**From:** [Jos Bakker](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Proposal 170  
**Date:** Friday, February 27, 2015 8:40:33 AM

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## **Proposal 170 – Hunting season and bag limits for brown bear**

### **I support proposal 170**

The brown bear population on the Kenai National Wildlife Refuge has sharply declined over the last several years due to overhunting. Brown bears have a very low reproductive rate and killing females at a rate of 28% to 50% per year of the harvest is unsustainable.

To stop this decline measures need to be taken: shortening the hunting season and lowering the harvest levels are the only way to go.

Hunter education is sorely needed too. The high harvest 28%-50% of females tells you the story .

**Jos Bakker**

**PO Box 211403**

**Auke Bay, Alaska 99821**



*SUBMITTED VIA EMAIL*

February 27, 2015

Alaska Board of Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
dfg.bog.comments@alaska.gov

**Re: Southcentral Region Board of Game Proposals 170 and 171 (Kenai brown bear)**

On behalf of the Center for Biological Diversity and our more than 825,000 members and online activists in Alaska and the rest of the United States, we thank you for the opportunity to comment on the Board of Game's proposed regulation changes for Southcentral Alaska. These comments focus on Proposals 170 and 171, dealing with management of Kenai brown bear hunting.

The Center urges the Board to adopt the Fish and Wildlife Service's proposal, Proposal 170. Given the high mortality rate of Kenai brown bears in 2013 and 2014, the Service's proposal likely does not go far enough in limiting brown bear harvest. It is, however, the most sensible proposal before the Board, and we therefore encourage you to adopt it.

The Kenai Peninsula's population of some 500 to 600 brown bears faces an uncertain future. The Kenai National Wildlife Refuge's emergency fall hunt closure in 2013 and subsequent closure from September 2014 through May 2015 highlighted the precarious situation in which the State of Alaska's predator control policies have placed this unique population of brown bears. At least 70 Kenai Peninsula brown bears were killed in 2013. In the spring 2014 state-sanctioned hunt at least 51 Kenai brown bears were killed.

These high harvest levels are unsustainable. A recent study shows that if human-caused mortality of adult female bears on federal lands continues at the rates recorded in 2013, Kenai brown bears face a 33 percent probability of extinction on federal lands in the next 25 years (Morton 2013). And continued human-caused mortality at 2013 levels through the year 2015 will lower the Kenai Peninsula brown bear population to less than 500 bears, at which point the population loses evolutionary viability (Traill et al. 2010, Flather et al. 2011, Morton 2013). As the Fish and Wildlife Service stated in its proposal, "modeling indicates that this high loss of adult females [in 2013 and 2014], in combination with high overall mortality, will continue to impact the population in coming years" (FWS, Proposal 170). Recent harvest levels are unsustainable and must be stemmed immediately. The Fish and Wildlife Service proposal, Proposal 170, is a



significant improvement over the current regulatory framework and is superior to the Alaska Department of Fish and Game's (ADF&G) proposal, Proposal 171.

## Kenai Brown Bears: Population Trends, Genetic Isolation and Extinction Risk

Kenai Peninsula brown bears are vulnerable to population decline and eventual extinction because of their small population, physical isolation from other bears, and genetic distinctness. Because of the bears' unique characteristics and vulnerabilities, the only way to ensure that Kenai brown bears do not become threatened with extinction is to drastically curb human-caused mortalities.

### A. Evidence of Genetic Isolation

The Kenai Peninsula brown bear population is exceptionally susceptible to rapid decline due to almost complete isolation from mainland brown bear populations through a combination of geographic and anthropogenic factors (Robinson et al. 2007). Since the end of the last ice age, the 24,300-km<sup>2</sup> Kenai Peninsula has been separated from the Alaska mainland by a 16-km-wide isthmus of ice, rock, and mountains, effectively restricting bear emigration or immigration to very low numbers. More modern impediments to movement through this narrow strip of land include two communities, two airstrips, 13 km of roads, two campgrounds, railroad tracks, a 30-km-long lake, and several glaciers (Farley 2005). Combined, these factors create a functional barrier to brown bear movement and connectivity between the Kenai Peninsula and the Alaska mainland.

Studies to date support the genetic isolation of the Kenai Peninsula brown bear population. Microsatellite and mitochondrial DNA analysis show that the Kenai Peninsula brown bears are less genetically diverse than mainland Alaska brown bears, and that the Kenai Peninsula brown bears do not breed with bears from the Alaska mainland (Jackson et al. 2008, Talbot and Farley 2009). This isolation places the Kenai Peninsula brown bears at risk of extinction, not only due to genetic factors including genetic drift and inbreeding, but also because a loss of genetic diversity reduces a population's ability to evolve and adapt to climate change (Visser 2008).

### B. Population Viability of the Kenai Peninsula Brown Bear

Recent analysis shows that the current hunting regulations threaten the long-term viability of the Kenai Peninsula brown bear. Populations prone to extinction are generally characterized by large body size, large home ranges, low densities, low recruitment rates, and limited dispersal—all attributes of the Kenai Peninsula brown bear population (Woodroffe 2001, Morton et al. 2013). For such populations, human-caused habitat degradation and fragmentation and restricted immigration or emigration exacerbate the risks of demographic stochasticity, disease, and inbreeding and genetic drift (Laikre et al. 1996, Frankham 1998, O'Grady et al. 2006, Boitani and Powell 2012). Extinction risks for Kenai Peninsula brown bear are amplified by high levels of human-caused mortality, including legal hunting, defense-of-life-and-property (DLP), illegal killings, and road kill (Suring et al. 1998, Suring and Del Frate 2002, Morton 2013, Morton et al. 2013).



Population viability analysis (PVA) is the most common tool used to determine the probability that a population will go extinct within a certain amount of time<sup>1</sup> (Boitani and Powell 2012). A PVA is an especially useful tool to determine a sustainable yearly mortality quota for a population such as the Kenai Peninsula brown bear, where anthropogenic factors play a large role in the number of bears killed each year, the animals are difficult to accurately census, and where the population faces additional stressors due to reduced genetic variability (Chesser et al. 1993).

Based on input and output parameters developed by Farley (2013), Morton (2013) calculated the population trend of Kenai Peninsula brown bears using a reproducible, scientifically-based PVA. The scientists inputted empirical data from the 2010 population census and from long-term studies on the bears to determine the future population trajectory of Kenai Peninsula brown bears under the current regulatory framework and various levels of human-caused mortality of adult female bears.

The model showed that if human-caused mortality of adult female bears on federal lands continues at the rates recorded in 2013 in which 12 percent (24) of adult females were killed, half (12) of which were on federal lands, this raises the probability of extinction on federal lands over 25 years to 33 percent (Morton 2013). Further, continued human-caused mortality at 2013 levels through the year 2015 will lower the Kenai Peninsula brown bear population to less than 500 bears, at which point the population loses evolutionary viability (Traill et al. 2010, Flather et al. 2011, Morton 2013).

Human-caused disturbance and range-contraction is a significant factor leading to the extinction of a population, and these factors are rapidly increasing on the Kenai Peninsula, increasing the relative risks of low population size (Channell and Lomolino 2000, Boitani and Powell 2012). Human activity and development may especially affect the most important group for population viability of the Kenai Peninsula brown bear—females with young. For example, females with cubs modify their movements based on perceived risk, assuming subdominant status and frequenting less productive salmon streams when risks increase (Suring et al. 2006).

Taken together, these factors—including small population size, genetic isolation and proximity to humans—make careful management and protection of Kenai Peninsula brown bears essential to preserving them. If current mortality trends continue, Kenai brown bears will qualify for listing under the Endangered Species Act. The state has the opportunity to reverse the downward trend, but it must act quickly.

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<sup>1</sup> The PVA process is widely accepted as the most scientifically valid means by which to establish a long-term conservation plan for a species. The International Union for Conservation of Nature (IUCN) recommends quantitative analyses using PVAs for Red List conservation status assessments when adequate data is available. The Fish and Wildlife Service routinely uses PVAs to determine extinction risk of a species.



## Conclusion: Adopt Proposal 170 and Reject Proposal 171

Proposal 170 would delineate “front country” and back country” areas for hunting and set separate caps on female mortality in the two areas. Although we are concerned that the Service’s proposed female mortality cap of 12 is not protective enough, it is preferable to the ADF&G proposed cap of 17. We support the Service’s proposed shortened season dates for the back country.

The Kenai Peninsula brown bear is an iconic figure on the landscapes of Southcentral Alaska and a huge draw for tourists and residents alike. But recent high mortality rates for Kenai brown bears are not sustainable and have already forced the Refuge to close its lands to brown bear hunting on two separate occasions. Should the trend continue, the Kenai brown bear will be on a path to Endangered Species Act listing. It is in the Board’s best interests to adopt more protective regulations now to prevent further imperiling the Kenai brown bear.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca Noblin".

Rebecca Noblin  
Alaska Director



## Sources

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**From:** [Kenneth Wilkinson](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Proposals 170, 180, 181, 150  
**Date:** Friday, February 27, 2015 8:29:47 AM

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**Subject:** Proposals 170, 180, 181, 150

### **I SUPPORT Proposal 170**

Submitted by managers at the U.S. Fish & Wildlife Service Kenai National Wildlife Refuge this proposal seeks to address the steep decline in the female brown bear population on the Kenai Peninsula by restricting hunting seasons and lowering harvest limits. New harvest limits would be based not just on the number of bears killed by hunters but on total Human Caused Mortality (HCM) which includes both hunting and bears killed in defense of life and property.

Because these brown bears are an isolated population, have low reproductive potential and are difficult to monitor (population studies in heavily forested regions are extremely difficult and expensive), brown bear management on the Kenai requires a very conservative approach. The 2013 and 2014 mortality rates for female bears are alarming, and clearly unsustainable. If the state's liberal harvest quotas for sport hunters remain in effect, the area's bear population will decline to a point where neither hunters nor non-consumptive users will be able to spot bears. Notwithstanding recent years' excessive mortality rates, the population was already at a low density compared to other costal brown bear populations. Continued decline will result in substantial long-term damage to the Peninsula's ecosystems. The USF&WS proposal includes stricter harvest limits in the Kenai's "back country". These are the most easily viewed bears - those that live closest to areas easily accessible to visitors, photographers and wildlife watchers. Continued substantial population losses among these bears will be a loss for the



area's tourism industry Any continued decline in the Kenai brown bear population is inconsistent with USF&WS's legal mandates, which include ensuring opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography.

### **I SUPPORT Proposals 180 and 181**

Together these proposals would restrict trapping within a 250-foot setback adjacent to specifically designated public roads, multi-use trails and recreation facilities near the communities of Cooper Landing, Seward and Moose Pass on the Kenai Peninsula. (Proposal 180 designates the specific closure areas for Cooper Landing, and Proposal 181 designates the areas for Seward and Moose Pass.)

- The Cooper Landing, Seward and Moose Pass areas are world-famous, year-round meccas for family-oriented outdoor recreation.
- Traps set adjacent to multi-use trails and facilities are dangerous to pets and small children. Such trapping is clearly incompatible with routes designed to be easily accessed by families with children and dogs.
- The proposed setback areas are limited in scope and clearly delineated. The regulation would be easily enforceable by wildlife troopers.
- Such regulations clearly specifying no trapping areas would go a long way to eliminate what can be emotional and unpleasant conflicts between recreational users and trappers - a "win-win" for both groups
- It is inequitable that the activity of just one user group - trappers - deters people partaking in many other activities from safely enjoying multi-use public facilities and trails. Nothing in the proposals restrict trappers from simply placing traps beyond the setback.

### **I OPPOSE PROPOSAL 150**

This proposal would establish a drawing permit hunt for up to 10 antlerless moose (cows) in Kincaid Park, a large and very heavily used park within the Municipality of Anchorage.

A heavily-used park such as Kincaid is incompatible with a moose hunt, even if the hunt is very limited in scope. It is disingenuous to initiate a sport hunt in the name of public safety. The current estimated moose population in the park is not excessive. Most of the moose are habituated to sharing the park with a wide variety of recreational users. Increased public education focused on ways to avoid moose encounters, rather than killing most of the moose, is a much more appropriate



means of preventing conflicts. Many Anchorage residents likely a majority - value Kincaid's moose and accept their presence when they recreate in the park. Moose thriving in a city park add to Anchorage's unique character and lifestyle. If a problem moose is identified and needs to be removed, trained wildlife biologists are best equipped to deal with it, not sport hunters randomly targeting all cow moose. Utilizing readily available professional wildlife personnel would be much easier, safer, and result in minimal disruption to public use of the park





As the author, I would like to withdraw proposal 194; Prohibit the use of hunting dogs on upland game birds after October 31, in Southcentral Region Units. I have since been in discussion with hunters who use working dogs, and I believe that this issue can be addressed outside of the Board of Game process.

Al Barrette

A handwritten signature in black ink, appearing to read "Al Barrette", with a long horizontal flourish extending to the right.



**FRIENDS OF  
THE  
ANCHORAGE  
COASTAL  
WILDLIFE  
REFUGE**

PO Box 220196  
Anchorage, AK  
99522-0196

Phone: 907-248-2503  
Fax: 907-248-3159  
e-mail: bc@farak.org

Ted Spraker, Chairman  
Attention: Board of Game Comments  
Alaska Department of Fish and Game,  
Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811-5526  
\*sent by email

Subject: FAR opposes BOG Proposal 150-5 AAC 85.045, Anchorage Area, Unit 14C

2015 February 25

Dear Mr. Spraker and Alaska Department of Fish and Game, Boards Support Section:

Friends of the Anchorage Coastal Wildlife Refuge (FAR) opposes the opening of Kincaid Park to a moose hunt. FAR supports Municipality of Anchorage Department of Parks and Recreation Director, John Rodda, in his letter, dated February 11, 2011, for all the reasons the City opposes this proposed hunt.

Recent human/moose conflicts signal an urgent need for greatly improved public education about appropriate human and pet behavior in Kincaid Park, and elsewhere, around wildlife. Furthermore, FAR supports ADF&G in their suggestion to seasonally close parts of Kincaid Park, to uses that will harass or disturb moose during important parts of their life cycles, such as calving and, perhaps, the rut. FAR recommends that ADF&G and MOA cooperate to help prevent said conflicts.

FAR recognizes the growing need to preserve the remaining habitats not taken by miles of trails and sports fields so that wildlife and slower moving user groups are also able to continue to use and enjoy Kincaid Park, as the master plan for this facility intended. Kincaid Park serves the City well as a place where tourists and residents appreciate unique opportunities to view and photograph scenic vistas and wildlife, watch wildlife, sketch, paint, walk, and gather data for scientific studies. The Park is a unique access to this spectacular wooded area and the Anchorage coast cherished by all. We strongly agree that, as the MOA suggests, ADF&G professionals should address, if circumstances dictate, sick, injured, or behavioral issues of a given animal. Professionals are usually able to take care of issues without closing the Park.

FAR has seen rumors that ATVs would be proposed to broach the Anchorage Coastal Wildlife Refuge for the purpose of helping hunters remove the carcass post hunt. This would be unacceptable as it would damage the fragile saltmarsh habitat (Class A Wetlands) below Kincaid Park.

Again, FAR opposes BOG Proposal 150-5 AAC 85.045.

Thank you for your time and consideration.

Sincerely,  
*Barbara Švarný Carlson*

Barbara Švarný Carlson  
President and Executive Director

cc: George J. Vakalis, Municipal Manager  
John H. Rodda, Director, MOA Parks and Recreation  
Holly Spoth-Torres, Park Superintendent  
Brad Cooke, Kincaid Recreation Supervisor  
Jessy Coltrane, Ph. D., Area Wildlife Biologist, ADF&G  
Gino DelFrate, Region 2 Management Coordinator, ADF&G



**From:** [Dena Selby](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** vote to limit hunting and trapping near recreation areas.  
**Date:** Wednesday, February 25, 2015 12:27:20 PM

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**Please vote "Yes" on proposals to limit brown bear hunting and restrict trapping near recreation areas on the Kenai Peninsula, and to vote "No" on a plan to initiate a moose hunt in Anchorage's Kincaid Park.**

**We need to protect the animals with common sense.**

**Dena**



February 27, 2015

From  
Robert Archibald & Roberta Highland  
Po Box 2460  
Homer, AK. 99603

To  
Ted Spraker, Chair, Alaska Board of Game  
ADFG Boards Support  
P.O. Box 115526  
Juneau, AK 99811

Subject

**PROPOSAL 183 - 5 AAC 92.530. Management Areas.**

Create a Management Area for Kachemak Bay in Game Management Unit (GMU) 15C:

Dear Board of Game,

We strongly support Proposal 183 in its entirety.

We also want to go on record as agreeing with the letter of support written by the Kachemak Bay State Parks Advisory Board; thus we will not reiterate their excellent comments.

Please support Proposal 183.

Sincerely,

Robert Archibald & Roberta Highland



# Kachemak Bay Conservation

3734 Ben Walters Ln, Homer, AK 99603

907 235.8214

kbayconservation@gmail.com



PC116  
1 of 1

PROPOSAL 183 – 5 AAC 92.530. Management areas. Create a management area for Kachemak Bay in Unit 15C as follows:

The following management areas are subject to special restrictions:

(1) The Kachemak Bay Management Area:

(A) the area consists of the land as designated as the Kachemak Bay State Park

(B) the area is open to hunting under regulations governing Unit 15(C), except as follows:

i. Restrictions will be considered under an open public process and submitted to the board to be included in this Special Management Area.

*What is the issue you would like the board to address and why?* This is a place holder to create a special management area consisting of the statutory boundaries designated as the Kachemak Bay State Park 41.21.131. This proposal creates a special management area to create consistent long range guidance to assist involved agencies in cooperatively managing the area of overlap of their legislative mandated responsibilities within the Kachemak Bay State Park (KBSP) AS 41.21.130-143 and the Kachemak Bay Critical Habitat Area (KBCHA) AS 16.20.590. 194

Ted Spraker,  
Chair, Alaska Board of Game  
[alisha.anderson@alaska.gov](mailto:alisha.anderson@alaska.gov)

Dear Ted Spraker,

The Kachemak Bay Conservation Society (KBCS) strongly supports Proposal 183, shown in the text box above. We believe the justifications outlined under the proposal provide a clear rationale for the need and value of establishing the Kachemak Bay Management Area.

KBCS would like to emphasize the following reasons that this proposal should be adopted:

1. Adoption of proposal 183 will provide a more comprehensive and coordinated approach to wildlife and habitat conservation within Kachemak Bay State Park (KBSP) and the Kachemak Bay Critical Habitat Area (KBCHA).
2. Adoption of proposal 183 will enable management of wildlife populations and habitats in the new area to be more specifically tailored towards addressing concerns and priorities outlined in the ADF&G action plan *Our Wealth Maintained: A Strategy for Conserving Alaska's Diverse Wildlife and Fish Resources* (ADF&G 2006, revised 2015).

KBCS wholeheartedly supports the wise and forward-looking efforts being made by the Kachemak Bay State Park Citizens' Advisory Board to promote establishment of the Kachemak Bay Management Area.

Sincerely,  
Roberta Highland  
President,  
Kachemak Bay Conservation Society



# **BACKCOUNTRY HUNTERS AND ANGLERS ALASKA CHAPTER**

www.alaskabackcountryhunters.org



PC117  
1 of 9

February 27, 2015

## **Comments to the Alaska Board of Game Southcentral Meeting March 13-17, 2015**

### **Sheep Issues**

Alaska Backcountry Hunters & Anglers has twice now submitted proposals to this Board to limit nonresident sheep hunters in Region III because of the known problems in some subunits where unlimited nonresident sheep hunters and the unlimited guides they are required to hire are causing overharvests of sheep, conflicts and crowding afield, and levels of harvests that can lead, and have led, to restrictive drawing hunts for both nonresidents and residents.

It should be noted that this Board requested that we not submit a proposal to only “fix” problem areas or “hotspots,” because the Board was unwilling to just fix certain subunits due to that exacerbating and spreading the problems elsewhere. This is why our proposals have addressed all of Region III.

The issues and problems surrounding sheep hunting are not something that is unknown. Both the guide industry and this Board have stated repeatedly in public and to the legislature that we have a big problem with a system that places no limits on the number of big game guides nonresidents are required to hire, along with unlimited nonresident sheep hunting opportunities in many areas of the state.

Yet this Board has continued to not address these concerns, either voting down or deferring the numerous sheep proposals that have come before this body.

In February of 2014 at the Interior Region III Board of Game meeting the public was told that the Board had requested that ADFG commission a scientific sheep survey to better understand what was going on afield, and what the issues and concerns were and if those concerns that have led to the numerous sheep proposals before this board were valid.



The Board at that time deferred all the sheep proposals before them to the 2015 Region IV meeting in Wasilla, using the rationale that the results of the sheep survey would help them make a more informed decision.

The results of the sheep survey only highlighted the many problems so many have been complaining to this Board about over the last several cycles. Yet the Board still refused to address the proposals before them, and instead generated their own proposals that are ostensibly going to be acted on (or deferred) at this Region II meeting in March 2015.

During all this time, the Department has not really been able to present data that accurately reflects the reality of what is going on in individual subunits. A case in point is the Department’s presentation to the Board last month at the Wasilla meeting (RC 74) regarding all the sheep proposals before it. Nowhere in that presentation did the Department break down the statistics for individual subunits in Region III. Instead they presented graphs going back 30 years that showed yearly levels of nonresident and resident sheep hunter numbers and harvests region-wide.

Here below is the Department data we expected them to show the Board, taken from the Department’s A&Rs on our proposal #111 (Region IV 2015) that has been withdrawn.

Table 111-1. General season hunter statistics during fall 2004-2013 Region III Dall sheep hunts:

Unit/Area	Average annual hunter numbers	Percent resident hunters	Average annual harvest	Percent harvested by residents	Resident success rate	Non-resident success rate
All Region III	1,254	70%	503	50%	29%	62%
Unit 12	288	76%	106	55%	27%	63%
Unit 19C	136	47%	72	29%	33%	64%
Unit 20A	226	64%	90	38%	24%	67%
Remainder Unit 20	39	93%	9	90%	22%	28%
Unit 25A	131	59%	71	49%	45%	65%
Unit 25C	52	95%	9	92%	17%	12%
Units 26B & 26C	287	76%	115	60%	32%	59%
Remainder Reg. III	96	77%	31	61%	26%	52%

Many times members of this Board and the public have said on the record that 8 in 10 of all sheep hunters in Alaska were residents, alluding they made



up the vast majority of sheep hunters and that it wasn't nonresident sheep hunters (or guides) that were a problem.

But if we look at the reality, according to the Department, averaging over the last nine years across Region III, nonresident sheep hunters make up 30% of all hunters and take 50% of the harvest.

Keep in mind that nonresidents make of 30% of all Region III sheep hunters even though we have restrictive drawing hunts in areas like TMA and DCUA that limit nonresidents to only 10% of permits.

Further breaking it down, in subunit 19C nonresident sheep hunters make up 53% of all hunters and take 71% of the total harvest.

Table 111-1. General season hunter statistics during fall 2004-2013 Region III Dall sheep hunts:

Unit/Area	Average annual hunter numbers	Percent resident hunters	Average annual harvest	Percent harvested by residents	Resident success rate	Non-resident success rate
All Region III	1,254	70%	503	50%	29%	62%
Unit 12	288	76%	106	55%	27%	63%
Unit 19C	136	47%	72	29%	33%	64%
Unit 20A	226	64%	90	38%	24%	67%
Remainder Unit 20	39	93%	9	90%	22%	28%
Unit 25A	131	59%	71	49%	45%	65%
Unit 25C	52	95%	9	92%	17%	12%
Units 26B & 26C	287	76%	115	60%	32%	59%
Remainder Reg. III	96	77%	31	61%	26%	52%

*In subunit 19C nonresident sheep hunters make up 53% of hunters and take 71% of the total harvest.*

In subunit 20A, a known problem area, nonresident sheep hunters make up 36% of all hunters and take 62% of the total harvest.



Table 111-1. General season hunter statistics during fall 2004-2013 Region III Dall sheep hunts:

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Remainder Unit 20	39	93%	9	90%	22%	28%
Unit 25A	131	59%	71	49%	45%	65%
Unit 25C	52	95%	9	92%	17%	12%
Units 26B & 26C	287	76%	115	60%	32%	59%
Remainder Reg. III	96	77%	31	61%	26%	52%

***In subunit 20A nonresident sheep hunters make up 36% of hunters and take 62% of the total harvest.***

So why does neither the Department nor the Board ever really get this kind of factual information out there during meetings? And if the sheep survey conducted by Dr. Todd Brinkman essentially proved that the concerns so many had were real, why did this Board continue to kick the proverbial can down the road and again do nothing?

At the Region IV meeting in Wasilla last month, this Board held an informal sheep town hall meeting that drew 168 members of the public. The one single thing everyone agreed on is that there are far less sheep out there today than there have been.

Yet neither the Department nor the Board will say we have any real sheep conservation concerns.

Again, we want to include Chairman Ted Spraker’s testimony to the Alaska legislature in 2013 (pasted in after our comments), testifying in support of the proposed Guide Concession Program to limit big game guides in Alaska on state and BLM lands. This was the Board’s solution to the “nonresident component” problem. Putting all nonresidents on draw-only hunts was not the desired solution for the Board or the guide industry, and we understand why that is, but with the failure of the Guide Concession Program, for



Chairman Spraker and this Board to continue to do nothing to solve these known problems is –and we mean this with all due respect – simply wrong.

It's wrong for the sheep resource, it's wrong for residents, and it's equally wrong for nonresident sheep hunters as well as the guides they are required to hire.

In the end, while any nonresident over-the-counter sheep tag will always be coveted, our nonresident hunting brethren are becoming more and more aware of the problems in some areas of the state like 20A, and they will look for Canadian sheep hunts or sheep hunts conducted on federal lands in Alaska where guides (and their clients) are limited. None of these problems if they continue are good for the state's reputation, guide businesses on state and BLM lands, resident sheep hunters, and most especially the Dall sheep resource.

And what's equally wrong in our opinion is the Board generating a proposal that includes limiting resident sheep hunters, when there has not been a single proposal to do that coming from the public over the last few cycles.

The bottom line is this: AK BHA has always respectfully communicated with other orgs, this Board, and the Department, on these sheep issues. We firmly believe we have sheep resource concerns in some areas. We also firmly believe that by waiting too long to address the nonresident/guide component, that both resident and nonresident sheep hunters will be put on restrictive draw-only hunts. We have offered compromises others haven't. We have tried to work with all parties to first and foremost protect our sheep populations and secondly to ensure our membership and all resident sheep hunters continued to have sheep hunting opportunities.

**We are frustrated.** We sincerely believe this is not how the best system of wildlife management in the country, that allows for such widespread involvement and engagement of the public, is supposed to work.

### **Conclusion on Sheep Issues**

AK BHA supports a formal state-sanctioned sheep Working Group to address sheep issues and make (nonbonding) recommendations to the Board of Game at the 2016 Statewide meeting in Fairbanks.



We also support continued efforts on a workable Guide Concession Program the legislature can go along with, to solve the (known) nonresident and guide component problems.

Should neither of these two things come about, we will be submitting a similar proposal to address these issues at the next available opportunity.

### **Proposal 207 – Support as amended**

Alaska Backcountry Hunters & Anglers supports option #2 in the Board-generated proposal #207 to extend the current timeframe between when a sheep hunter can land via aircraft and help to take, or take a sheep. We support changing the regulation from 3am the next day to 2pm the next day after flying when a hunter can help to take, or take a Dall sheep.

### **Proposal 208 – Oppose in entirety**

Thank you for the opportunity to comment. Chairman Spraker's comments to the legislature are below.

Sincerely,

Mark Richards

Chairman – Alaska Backcountry Hunters & Anglers

Complete Testimony of BOG Chairman Ted Spraker  
House Resources Committee Hearing  
HB 158 – DNR Guide Concession Program  
March 11, 2013  
(transcribed by Mark Richards)

“Mr. Chairman I am here today representing the Board of Game to discuss and share some of the challenges – and you’ve heard a lot of them already today - that the Board of Game will face if some sort of guide concession program to regulate the numbers of guides and the moving around of guides throughout the state is not implemented.

But I do want to make it very clear that I’m not here today to discuss the finer points of this project. You know, we look at the conservation and so forth, we’re not looking at the budgets or the areas or how these programs are laid out, we’re just looking at the resource.



And we have two major concerns; in fact we have written three letters of support to DNR since I've been on the board supporting some sort of limit to the number of guides and their ability to move around the state. And the reason we have supported it with three different letters, there's two reasons, one is conservation of the resource and the 2<sup>nd</sup> concern the Board of Game has – and we've addressed this quite a bit – is crowding. And we feel that under the current system where there is no limit to the number of guides that can operate on state and BLM-managed lands, this has resulted in some fairly heavy generally localized overharvest of game and certainly crowding.

And I want to give you just a little bit of experience from the Board of Game. Every meeting that I've attended since I've been on the board – and I started in January of '03 – there's been proposals requesting some sort of reduction in harvests by nonresidents. And it first pretty much started, and in the last couple terms that I've been involved in it, it's been surrounding sheep harvests. Primarily competition and overharvest and so forth of legal rams for sheep hunting. But now we have proposals and it's spread to all big game, we've got proposals ahead of us now that deal with some sort of reduction in nonresident take for all big game, so that has changed.

And the requests come in basically two forms. First, proponents of these or offerers of these proposals would like to first eliminate all nonresident hunters; that's a common statement, or at least stagger the opening season dates. We commonly see that in proposals to give the residents a five day or seven day head start before any nonresident hunter is allowed to hunt. The second kind of level of proposals that we get are to only allow nonresident hunting by limited drawing permits. And usually there's an allocation assessed with these proposals, and it's usually around 10%..

And I went through the recent supplement for drawing hunts and I looked at all the hunts and just struck them down to 10%., and that's quite an exercise but I would encourage you if you're interested in this to look at it. That's huge. That would really make a difference. You've heard a lot about the financial benefits of nonresidents, you know the Board doesn't really look at all the financial parts of it, we look at the conservation. But we understand those things. And this 10%, if that was approved by the Board, would be absolutely huge as far as money coming into our state that go to the Department of Fish & Game for managing our game.

The second thing that we are really faced with is this crowding issue, and I want to give you just a couple of quick examples. We've talked a lot about the Palmer to Glenallen area, 13D/14A, this is south of the Glenn Highway. And as I said we had 36 to 38 guides that were operating in this area. What the Board did, because we had several proposals to address this, we convened kind of a town hall meeting. And the room was full. We had guides, we had a lot of resident hunters there that were interested in sheep hunting. We had a very good discussion. And what was interesting to be because I realize how guides have such difficulty with their financial plan and stability when you go on permits. Knowing that, what really interested me is, all but one guide – and there were probably 8 or 10 guides in the room that operated in this area – all but one guide said, we've had



enough, competition is so fierce in this area we can't offer a quality hunt, there's very limited chance for success for our clients, and we just can't compete at this level anymore. We would rather have permits, and then the quality goes up, the size of the ram goes up, we have more sheep to look at, the conservation part's addressed, and mainly the crowding issue is addressed. We've seen examples of that.

Another area the Board of Game is looking at, and I'm sure this is going to come up fairly soon, we've got a meeting in Fairbanks 2014 in the spring, and this is south of Fairbanks, 20A, there's currently about 15 guides registered for this area. And from what I hear from other guides – I'm not a guide – but what I hear from other guides around the state is that the area can probably support about a third of that number and have some really quality hunting, so that's another area we're going to have to deal with, And here's something else that I'm really concerned about. Is that, there's a difference in having guides competing with guides, that's one issue, but the way I look at it as a BOG member, and a real state's rights sort of guy, is that this really puts a lot of competition on residents. Because guides are well equipped, they have large camps, wall tents, a string of horses, aircraft, they're set up, I mean this is their business. For your average hunter that goes in there for a long weekend or a week or whatever, those guys, those residents have a tough time dealing and getting game in places where you have a lot of guide competition.

Another area, and Deputy Commissioner Fleener referred to this one as well, is 19C, it's over west of the Denali National Park, and in this area it's primarily competition between guides. And we've heard this from several guides. One guide that I know personally that works in this area said that the competition is building. I think part of that may be because of what the Board did down in 14A and 13D, I think we probably pushed some of these guides over into that area. And again, when you have an area that's fully utilized, and when you're sheep hunting the areas of access and landings strips and so forth, regardless of how good of a super cub driver you might be, they're limited, there's a finite number of places you can access these sheep areas, And if the guides are operating all of those, and they're usually there the full season, again it really impacts the number of residents that hunt in that area.

My last example on that series is we have our next BOG meeting, starts Friday in Kenai, and before us we have 53 proposals. We have 9 proposals addressing some sort of competition, overcrowding, overharvest or whatever, and this competition between residents and nonresidents. And that ratio is not uncommon in the last four or five years I've been on the Board. So there's a lot of concern.

Mr. Chairman, in summary, just a few points.

The Big Game Commercial Services Board licenses about 15 to 20 – some years even more than that -- new registered guides each year. And in the Board's opinion, we just don't have enough state land to accommodate that level of growth without additional hunting restrictions. And here's the concern of the Board again.



These new guides probably will not be able to compete successfully with established guides in the area. But I'll tell you who these young guides, and very ambitious guides can compete with, are residents of the state. And again, as we add more new guides, and we don't have some sort of limit on the number of guides or how large an area they can operate in, I think it spills down to the residents and really impacts the residents and their ability to take game.

Another concern we have of course is if this plan or some sort of plan is not implemented, the board will be obligated to address what we usually call hotspot hunts. Representative Wilson brought up this point about, why don't you just fix some of these areas – what the Board has run into is that what the board has run into is that if we fix an area over here, what we do is we push the problem over there. And we're pretty handy at doing that under this system because we recognize hotspot issues. We've done this kind of a piecemeal sort of operation and I think the BOG has pushed some of these problems to other areas, whereas if we had some sort of global approach I think it would be a lot better. Better for nonresident hunters through guides and certainly better for residents.

Mr. Chairman, my last point, or just concluding statement is, I think that by adopting some sort of system to regulate the guiding numbers, and would address this conservation and crowding, we're going to greatly benefit not only the future and stability of the guiding industry – I think that is paramount here – but I think it's really going to make a difference in the hunters that are residents of the state, and benefit the residents. I see a lot of – and I've looked at this fairly carefully – I see a lot of benefits from this sort of regulation to resident hunters in the state, especially when it comes to places that are really popular for moose hunting and popular for sheep hunting.

Mr. Chairman, with that I'll conclude and I'll do my best to answer any questions.”



**From:** [Jim](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Upcoming Proposals  
**Date:** Friday, February 27, 2015 10:38:00 AM

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Dear Members of the Alaska Board of Game,

I'm writing to support proposals 170, 180 and 181 and voice my opposition to proposal 150.

Proposals 170:

I have followed this issue for over a year and have written two letters to the manager of the Kenai National Wildlife Refuge in December 2013 and Aug 2014 supporting the emergency and temporary closures on the Kenai Peninsula due to the significant decline in adult female brown bears. Those closures were examples of responsible wildlife management and Proposal 170 continues in that same vein.

It is my understanding that the U.S. Fish & Wildlife Service has proposed restricting hunting seasons and lowering harvest limits in an effort to address the inordinate declines in the female brown bear population. I support this proposal as well as the educational and enforcement efforts, particularly as they pertain to improperly stored food and trash. Addressing food and trash issues is critical in preventing nuisance bear encounters and is our responsibility in coexisting with this beautiful animal.

Hunting limits were not imposed in 2013 thus the need for the emergency and temporary closures. I support the U.S. Fish & Wildlife Service's conservative approach in preserving female population numbers. The data clearly supports using the Human Caused Mortality index as a reasonable way to ensure the sustainability of this magnificent resource, to do otherwise is irresponsible. The conservative approach outlined in this proposal is further warranted given the isolated area these bears habitat in, their low birth rates and the difficulty of obtaining population counts in such a heavily forested area.

The sport hunting quota can not remain in effect given the current data showing declines of over 69 bears a year. Responsible game management requires that visitors, bear watchers and photographers have opportunities to view these magnificent creatures in the back country. Declines in populations can become precipitous if not managed with care. Further declines in the bear population in this area will result in the loss of a treasured resource for the wild life watcher as well as the hunter.

I personally know of out of state tourists who spend significant dollars visiting the Kenai Peninsula to watch these bears and visit the surrounding area who would not spend these dollars if this resource is not managed correctly. I would also like to visit this area and will closely watch how the Board addresses this proposal.

Proposals 180 and 181:

I support the trapping 250 foot setback for roads, trails and recreational facilities near the communities of Cooper Landing, Seward and Moose Pass Areas.

Recreationalists that include families, children, dogs and others on foot should not have to concern themselves with dangerous traps at recreational access points to public lands. The 250 set back is a limited and reasonable approach to a potentially dangerous situation. One user group (trappers) can not trump the utilization of public lands.

Nothing prevents trappers from setting traps beyond the 250 limit. I find it hard to understand why there would be any resistance to this reasonable and enforceable limitation.



Proposal 150:

I do not support a sport hunt in Kincaid Park. It is particularly distressing to me that this proposal has veiled itself as a sporting opportunity for the disabled and a mechanism to address human-moose encounters which have garnered some recent publicity.

This is a heavily utilized park within the city limits of Anchorage and is not appropriate for a sport hunt. Requiring closure of the park and the monitoring of all the access points is all we need to know in determining the inappropriateness of this location for a sport hunt. Requiring a waiver to the municipal ordinance that prohibits firearm discharge ( a waiver Anchorage officials do not support) also points to the inadvisability of this proposal.

The few isolated incidents of human moose interaction is not resolved by a sport hunt. Most residents of Anchorage enjoy and are respect the close proximity of moose in this area. If it in fact is, or becomes a problem the best solution is to allow the trained wildlife biologists to deal with the problem through public education and other resources at their disposal.

Thank You for allowing me to provide my input and I hope your decisions will be guided by the reasonableness, sound data and science behind the support and opposition to the above proposals.

Sincerely,

Jim Broderick  
james6534@earthlink.net



# The Alaskan Bowhunters Association

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PC119  
1 of 3

## The Alaskan Bowhunters Association Proposals for Early Archery Sheep Seasons

**Registration permit season August 1-9 for archery only**  
**Full curl, double broomed or 8 year old Rams only**  
**All sheep areas statewide, which allow harvest ticket**  
**IBEP certified bowhunters only**  
**No scope sighted centerfire firearms allowed in the field**

- **Would reduce crowding at the Aug 10 opener**
- **Could be easily implemented this year**
- **Participation and success rates could be closely monitored**
- **Would increase sheep hunting opportunity**
- **Would provide guides with additional hunt to sell**
- **Would increase business for air taxis and Transporters**
- **Would have minimal impact on the sheep population**
- **Would not discriminate against nonresidents**
- **Could be considered experimental for 2-3 years pending the results**
- **Biologically not harmful to sheep population as shown by some Canadian sheep hunts starting mid July**
- **Brinkman survey showed high support**
- **Bowhunting only is a limitation of methods. It is not a special interest group**
- **Would be interesting to see how many rifle hunters would take up archery gear to hunt the early season**



**Proposal 169 – Support:** This proposal is for an early archery season for Dall sheep and falls under the general discussion of sheep hunting statewide. Allowing an archery season for sheep starting on August 1<sup>st</sup> and requiring full curl, double broomed, or eight years old would provide extra opportunity for hunters to be in the field hunting sheep under less crowded conditions. This would improve the quality of the experience for both the hunters choosing to use archery gear who would not be competing with firearms hunters as well as sheep hunters choosing to use firearms because there would be less crowding in the field. Business wise it would be good for guides, transporters and air taxis by providing an extra hunt for which to provide their services. Because archery hunters make less noise they would not disturb the sheep populations as much as simply providing an extra week of firearms hunting. Biologically it should not be a problem because Dall sheep seasons open in parts of Canada as early as July 15<sup>th</sup> without affecting the sheep populations. This hunt could easily be implemented this next regulatory year as a registration hunt. That would allow close monitoring of the effectiveness of the hunt in terms of both participation and harvest success. If 20 years of experience with the Unit 14C archery hunts is to be believed there will only be a less than 2% harvest rate for archery hunters seeking mature full curl rams.

We would like to emphasize that with modern archery gear, nearly anyone can learn to hunt with conventional archery equipment. So bowhunters are NOT a special interest group. Providing an archery only hunt is a limitation of methods and means. Archery hunts are NOT hunts provided for a special interest group.

We would also like to point out that according to the Brinkman survey (Table 12 pg 20), more archery only hunts had the highest approval of any of the alternative hunts suggested on the survey when all resident hunters were pooled.



**Proposal 164 – Support:** this proposal is to request an archery season for moose extending seven days after the regular season. This would include elimination of the early August archery moose hunts. So we are not requesting more hunting days. We are requesting the same number of days but at a time when there is less foliage, the bulls are moving more and are out of velvet and when meat care is more practical because of cooler weather.

As a corollary to this proposal we would partially support the proposal #163 to eliminate the early archery season for moose but would not support that entire proposal to eliminate all early or late special weapons seasons. We also do not support proposal # 165 to create yet another early archery moose season.

**Proposals 172, 173 & 174 – Support:** We believe the requirement to salvage Brown/Grizzly bear meat if the bear is taken over bait is inappropriate and was placed there by individuals who are opposed to baiting bear. In no other hunt statewide (except for subsistence hunts) is it required to salvage meat from Brown/Grizzly bear. This regulation stands as an obstruction to hunters harvesting Brown/Grizzly bears. The Board of Game has made it clear that they would like a higher harvest of those bear. So by keeping this regulation they are going against their own policies of harvesting more bear.

**Proposal 195 – Support:** The requirement to remove all “contaminated soil” from a bait station was not initiated by the Board of Game but was added as a discretionary condition by members of ADF&G who were basically opposed to bear baiting. It is virtually impossible to do. There is no good definition of what constitutes contaminated soil and no direction on what should be done with it. There has been no demonstrated need for this regulation. It is basically meant to harass and act as an impediment to bear baiting. It places hunters at risk of prosecution in spite of their best efforts to comply with the law.



Kachemak Bay State Parks Citizens Advisory Board  
P.O. Box 3248  
Homer, Alaska 99603  
907-235-7024

February 20, 2015

Ted Spraker, Chair, Alaska Board of Game  
ADFG Boards Support  
P.O. Box 115526  
Juneau, AK 99811

**PROPOSAL 183 - 5 AAC 92.530. Management Areas.**

Create a Management Area for Kachemak Bay in Game Management Unit (GMU) 15C:

Proposal 183 provides a more comprehensive wildlife/habitat conservation approach to prevent depletions while developing and conserving wildlife resources within Kachemak Bay State Park (KBSP). We ask the BOG to consider using a framework similar to the ADFG Wildlife Action Plan to coordinate activities and reinforce communication between ADFG, ADNR, the educational/research organizations, and concerned constituencies to ensure greater public participation and support for the regulatory process.

KBSP is not only an invaluable, popular Special Purpose Site created to preserve and protect its unique and exceptional scenic nature, including fauna, but it also overlaps a portion of Kachemak Bay Critical Habitat Area (KBCHA) set up to "protect and preserve habitat areas especially crucial to perpetuation of fish and wildlife".

Other relevant designations in KBSP, include a National Estuarine Research Reserve (KBNERR), NOAA Habitat Focus Area, a National Water Trail, and a Western Hemisphere Shorebird Reserve Network, site of International Importance.

The ADFG Kachemak Bay Critical Habitat Management Plan documented the historic concerns with some populations of fish and wildlife within Kachemak Bay. For example, many fished species such as herring; King, Tanner, Dungeness Crabs; Spot, Side stripe, Coon stripe Shrimp; Sea Cucumbers; Steamers, razors, and Sea urchins, were reduced to precarious thresholds leading to depletion and closure.

Populations of abundant sea duck species prominent in this CHA Plan are now depleted and are listed as species of greatest conservation need in the Departments Wildlife Action Plan. The high level of human use of Kachemak Bay combined with the vulnerable wildlife resources of the Bay, warrants creating a discrete management area.

The rugged Gulf of Alaska Coastal Mountain Ecological region contrasts sharply from the rolling Cook Inlet Basin Ecological region of the remainder of 15C. The different species assemblages and densities need a more judicious and systematic review under a more objective KB Management Area.

Harvest continues on some depleted species at the same levels as when populations were abundant and strong and biological conditions were more favorable. Shifted baselines or what is known as generational amnesia, may be the culprit. Knowledge extinction occurs because a younger generation of managers and the public are not aware of past biological conditions so recent "baseline" surveys actually depict depleted populations, when compared to local knowledge of species, size, and abundance.



We urge the BOG to create a Kachemak Bay Management Area that will utilize local knowledge, research, and education under a plan modeled on the **ADFG Wildlife Action Plan**, a blueprint for a Comprehensive Wildlife Conservation Strategy. The objective is to evaluate harvest and rehabilitate depleted species as required under the CHA Management Plan and "keep common species common."

This Action Plan Strategy is designed to help Alaska prevent further Threatened and Endangered listings thereby reducing the potential for federal oversight. Depleted species run contrary to our ADPDR, ADNR and ADFG statutory and regulatory obligations as well as mission statements, guiding principles, and goals.

As a vehicle to open dialog with the BOG, the ADNR and ADFG and relevant to the creation of this proposed **Kachemak Bay Management Area**, both KBSP and KBCHA Management Plans mutually agree through a Cooperative Agreement that includes:

1. *"Nothing alters the obligation of DPOR and resource management divisions (Wildlife Conservation) to work with each other on issues regarding management of fish and wildlife populations and harvest," and*
2. *"A free exchange of research and information between agencies is encouraged and is necessary to attain the management goals of the state."*

With dwindling state revenues and the need to streamline agency efforts, this proposed KB Management Area creates an efficient, coordinated, transparent approach to clarify, corroborate, and validate wildlife management actions.

And finally, to provide for public safety, maximize efficiencies between agencies, and effectively reduce confusion to the public, this **KB Management Area** can enable existing KBSP regulations specific to KBSP boundaries. Current ADNR regulations restrict or manage certain hunting and firearm discharge practices. Inclusion in ADFG Game Regs, summary publications, and website brings clarity.

These specific DPOR regulations include:

1. All commercial (guided) hunting, fishing viewing or transportation activities are required to have a DPOR permit.
2. Discharge of a firearm is prohibited within 1/2 mile of any developed facility, campground, trailhead, building or other developed areas.
3. Target shooting and firearms siting is prohibited.

Thank you for considering a more effectual, cost effective Management Area to safeguard the Park's Habitat and wildlife species. We are eager to begin serious dialog among involved agencies, the Boards and NGO's to better conserve and manage wildlife populations and habitats for a wide range of public uses and benefits.

With Sincere Regards,

David Taylor , Chair  
KBSP Citizen Advisory Board



CC:

Governor Bill Walker

Governors Transitional Wildlife Committee Chair

Sam Cotten, Commissioner ADFG

Representative Paul Seaton

Senator Gary Stevens

Senator Peter Micciche

Tony DeGange Wildlife Habitat Director

Wildlife Diversity Program

Bruce Dale -Wildlife Conservation Director

Kristy Tibbles, Executive Director, Alaska Board of Game

Ben Ellis, Director, Division of Parks and Outdoor Recreation

Claire LeClaire, Director, Division of Parks and Outdoor Recreation

Jack Blackwell, Division of Parks and Outdoor Recreation

Roger McCampbell, Division of Parks and Outdoor Recreation

Jason Wholey, Division of Parks and Outdoor Recreation

Joe Meehan, Habitat Division

Ginny Litchfield Habitat Permitting

Center for Alaskan Coastal Studies

Western Hemisphere Shorebird Reserve Network

National Maritime Wildlife Refuge

Kachemak Bay Environmental Education Association

Nature Rocks Homer

Homer Chamber of Commerce

Homer City Manager

Mike Navarre Kenai Peninsula Borough Manager

Kachemak Bay National Estuarine Reserve

Kachemak Bay Birders

Kenai National Wildlife Refuge

Alaska Maritime Wildlife Refuge

Center For Alaskan Coastal Studies

Homer High School

Homer Junior High School

Sailwood Lodge – Sadie Cove

Kayak' Atak

Makos Water Taxi

Kodiak Treks

Kachemak Bay Excursions

Homer Book Store

Coal Point Trading Company

Lands End Resort

Inspiration Ridge Wildlife Reserve

Alaska Tree Tops Lodge

Cook Inlet Keeper

Hallo Bay Wilderness



Emerald Air Service  
 Bald Mountain Air Service  
 Northwind Air Service  
 Homer Howl  
 Friends of Kachemak Bay State Park  
 National Water Trail Committee  
 K-Bay CHA Board  
 Pratt Museum  
 K-Bay National Estuarine Reserve  
 K-Bay Conservation Society  
 China Poot Wilderness Lodge  
 Sadie Cove Wilderness Lodge  
 Tutka Bay Wilderness Lodge  
 Still Point Retreat -- Halibut Cove

1. **Kachemak Bay State Park (KBSP)**

- legislatively acquired in 1970
- **Authority:** Art VIII, Sec.7 Special Purpose Sites Alaska State Constitution.
- **Purpose:** "to protect and preserve these lands and waters for their unique and exceptional scenic nature, the park is established and shall be managed as a scenic park" (AS 41.21.131)
- **Obligations:** to protect and preserve the natural; geological, faunal, floral and cultural resources for scenic and wilderness values for long term multiple use and enjoyment such as camping, picnicking, sightseeing, nature study, hiking, and related activities. (AS 41.21.990)

2. **Kachemak Bay Critical Habitat Area (KBCHA)**

- Legislatively created in 1974
- **Authority:** AS 16.20.500 – 16.20.690
- **Purpose::** to protect and preserve habitat areas especially crucial to perpetuation of fish and wildlife
- to restrict all other uses not compatible with this purpose.
- **Obligations:** to manage the area to maintain and enhance fish and wildlife populations and their habitat
- **"Priority** should be given to rehabilitate depleted species."
- To provide consistent long range guidance to ADFG and other agencies involved in managing the Critical Habitat Areas

3. **Legislative and Constitutional obligation:**

- AS 41.21.131 (Kachemak Bay State Park)
- AS 41.21.140 (Kachemak Bay State Wilderness Park)
- AS 41.21.990 " In order to protect and preserve these relatively spacious areas of outstanding natural significance, where major values are in their natural geological, faunal, and floral characteristics..."
- AS 41.20.020. (Duties of Department of Natural Resources)
- **Art. VIII, Section 7. (Special Purpose Sites) Alaska State Constitution**



The legislature may provide for the acquisition of sites, objects, and are historic, cultural, recreational, or scientific value. It may reserve them for their administration and preservation for the use, enjoyment, and welfare of the people.

- **Sec. 38.05.295. (Parks and Recreation Areas) Alaska Statutes**

The commissioner shall establish a policy and prescribe rules and regulations by which parks and recreation areas, including public scenic overlooks and cultural sites, shall be developed and managed in a manner that will best serve the interests of the people of the state. The commissioner may classify public lands as parks, scenic overlooks, cultural sites and recreation areas as long as the general intent of this chapter is maintained.

- **Sec. 41.20.040. (Division within Department of Natural Resources) Alaska Statutes**

The commissioner of natural resources may establish within the Department of Natural Resources a separate division to perform the functions relative to parks and recreational facilities specified in sections 10-40 of this chapter and related or additional functions as are otherwise assigned to the department by law.

- **Sec. 41.20.010. (Declaration of purpose) Alaska Statutes**

It is the purpose of this chapter to foster the growth and development of a system of parks and recreational facilities and opportunities in the state, for the general health, welfare, education, and enjoyment of its citizens and for the attraction of visitors to the state.

**Cooperative Agreement between ADNR and ADFG:**

- “the obligation of DPOR and the ADFG resource management divisions (Wildlife Conservation) to work with each other on issues regarding management of wildlife populations and harvest.”
- A free exchange of research and information between agencies is encouraged and is necessary to attain the management goals of the state.

**Mission Statement of Division of ADFG:** To protect, maintain, and improve the fish, game, and aquatic plant resources of the state, and manage their use and development in the best interest of the economy and the well-being of the people of the state, consistent with the sustained yield principle.

**ADFG Guiding Principles:** Seeking excellence in carrying out its responsibilities under state and federal law, the department will:

1. Provide for the greatest long-term opportunities for people to use and enjoy Alaska’s fish, wildlife, and habitat resources.
2. Improve public accessibility to, and encourage active involvement by the public in, the department’s decision-making processes.
3. Build a working environment based on mutual trust and respect between the department and the public, and among department staff.
4. Maintain the highest standards of scientific integrity and provide the most accurate and current information possible.
5. Foster professionalism in department staff, promote innovative and creative resource management, and provide ongoing training and education for career development.

**Goals:**

- Optimize economic benefits from fish and wildlife resources.
- Optimize public participation in fish and wildlife pursuits.
- Increase public knowledge and confidence that wild populations of fish and wildlife are responsibly managed

**Mission Statement of Division of Parks and Outdoor Recreation:**

The Division of Parks and Outdoor Recreation provides outdoor recreation opportunities and conserves and interprets natural, cultural, and historic resources for the use, enjoyment, and welfare of the people.

**Excerpts from KBSP Park Management Plan:**

- "Preserve the parks natural and cultural resources and scenic and wilderness values for long term multiple use and enjoyment."
- "To efficiently and effectively provide for multiple use outdoor recreation needs of park visitors with consideration to public preferences resource values and legislative intent."
- "To assist in the development of regional and statewide tourism."

**Excerpts from Kachemak Bay Critical Habitat Area Management Plan.**

- To protect and preserve habitat areas especially crucial to the perpetuation of fish and wildlife..." AS 16.21.500
- "to give priority to depleted wildlife populations, while creating sustainable multiple use opportunities."
- Minimize harmful disturbance to wildlife, especially marine mammals, and nesting, rearing, staging and wintering waterfowl, shorebirds, and seabirds
- Maintain, protect, and if appropriate, enhance the quality and quantity of nesting, rearing, feeding, staging and wintering habitat for resident and migrant waterfowl, shorebirds, and seabirds
- Maintain or improve opportunities for hunting, fishing, recreating, viewing, photography, education, and study of fish and wildlife.
- Provide information about the critical habitat areas to the public

**Excerpts from ADFG Wildlife Action Plan focusing on "the list of species on the Comprehensive Wildlife Conservation Strategy (CWCS):**

- "to conserve the diversity of Alaska's wildlife resources, focusing on those species with the greatest Conservation need."
- "to coordinate and integrate new conservation actions and strategies with Alaska's existing wildlife management and research programs."
- "to raise awareness of their conservation needs and promote opportunities for effective collaboration...to meet those needs."



- “to promote and facilitate meaningful participation by commur sharing information about the species and the ecosystems they use.
- “To look for every opportunity to unite in conservation efforts”

A Kachemak Bay Management Area can promote:

1. **The ADFG Wildlife Action Plan** as a conservation Strategy.
2. **Prevention** of further depletions.
3. **Meaningful participation** between our KBSP Board, KBCCHA Board, and the Homer F&G Advisory Committee.
4. **Synchronized Efficient and consistent research** between agencies, NGO's and the public
5. **Coordination and cooperation** between ADNR and ADFG multiple and mutual obligations to preserve and protect fish and wildlife populations.
6. **Develop an information/education program of Park and CHA.**
7. **Inform public about fish and wildlife values.**
8. **Communication** between land use habitat issues and the Board of Game process.
9. **Synchronized** research from adjoining neighbor organizations.
10. **Rehabilitation** of depleted species
11. **Acknowledge habitat ecological region designations**
12. **Opens communication** between ADNR and the BOG.
13. Puts **Wildlife Action Plan into Action** in a visible accessible popular Critical Habitat/Park.
14. **Fostering public understanding** of and support for maintaining and improving the diversity, health and wealth of Alaska's wildlife fish and habitat resources.
15. Formally **unites wildlife law enforcement activities rangers with officers.**
16. **Streamline and synchronize** agency forces.
17. Develop **wildlife habitat maps** to insert into Management Plans.
18. **Develop protocols** between agencies to better coordinate wildlife actions..
19. **Integrate educational** organizations.
20. **Integrate tourism** related businesses.
21. **Integrate research** organizations.
22. Develops a process, already in place, that provides broad opportunity for public involvement
23. **Promote consistency** between Management Plans to raise stature of wildlife into the outdoor recreation arena
24. **Integrate local knowledge** into species and habitat data/information systems
25. **Develop and implement uniform/ complementary habitat classification systems**
26. **Integrate** all agency and NGO GIS mapping overlays
27. **Opens communication,**
28. **Align and synchronize** multiple jurisdictional agency mandates.
29. **Expanding opportunities** to all constituencies
30. **Enhance our States economy** and bring tax revenue into State coffers.
31. **Create Consistency** to more effectively insure abundant wildlife populations



Submitted By  
Julian Mason  
Submitted On  
2/23/2015 10:21:14 AM  
Affiliation

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I support proposal 180 submitted by Ken Green. This is a reasoned approach to avoiding conflicts between trappers and other users of the trails, campgrounds, and various facilities. I am a licensed trapper and have a home in Cooper Landing.



Submitted By  
Carolyn Brodin  
Submitted On  
2/23/2015 7:38:41 PM  
Affiliation  
Girdwood Trails Committee/GBOS

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Girdwood Trails Committee members support in total Proposal 180 that prohibits trapping within 250 feet of any road that leads to public or private property in the Cooper Landing area. The Committee also supports Proposal 180's restrictions on trapping within 250 feet of multi-use trails and campgrounds and other special area closures in the defined area.

Like Cooper Landing, Girdwood and the Portage areas have seen increased recreational trapping that, though mostly legal, has resulted in dog injuries and worrisome user issues on the trails. Our members sympathize with Cooper Landing citizens and support their efforts to retain trapping but to limit it so that children, adults, and dogs are not harmed and so that disputes do not escalate. Girdwood Trails members find Proposal 180 to be reasonable, enforceable, and beneficial to Cooper Landing citizens and its winter visitors.



Submitted By  
David Armstrong  
Submitted On  
2/19/2015 6:21:41 PM  
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Dear Members of the Board;

On Wednesday evening I attended a presentation, in Valdez, as presented by Fish and Game from the Cordova office. It was a worthwhile presentation with a lot of information. My biggest concern at the conclusion of the meeting was the decrease in the black bear harvest numbers in unit 6D (Priiince William Sound).

I have been baiting bears in the Valdez Arm for about 12 years now. I have noticed since about 2006, a decrease in the number of sows with cubs at my stands. Actually, I have seen none since 2006. This year was probably the worst year I have had for the sighting of any bears, visually or on camera.

Our weather here has been unusual for the past four years. This year, 80" of snow, 2014 - 225", 2013 - 420" and 2012 - 525". In 2013 we had a lot of snow cover and a heavy rain that caused many avalanches and flooding over here. In 2014, "green up" started almost one month early.

In the past couple of years we have also seen a decrease in ocean sport fishermen. Many people travel for long weekends, to fish and bear hunt. This number has also been decreasing as can be seen by the increase of available boat slips within the harbor.

While the biologist had many stastics, NO ONE knows how many bears are currently in unit 6D. Were the heavy winters a factor, maybe. Was the early spring and green up a factor, maybe. Did people mis-schedule their hunt timing, maybe.

The fact is, no one, has any answers to why we saw a decrease in the black bear harvest. For that reason, I support, turning Unit 6D into a registration hunt until Fish and Game can obtain sufficent data as to the true population of black bears.

The biologist also said that an Emergency Order may also be necessary shutting down all bear hunting. It is the only option available to her to stop the decrease. Again, I would hate to see this as there is no data, supporting any conclusion as to why we had a decrease in the bear harvest.

Sincerely,

David Armstrong



Submitted By  
Diane McRoberts Powers  
Submitted On  
2/24/2015 12:26:32 PM  
Affiliation

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**I SUPPORT Board Game Proposal 180 - Cooper Landing Area.** Because trails are multi-use, efforts must be made for the safety of those using trails and roads. A 250 foot "safety zone" along roads and trails is necessary and reasonable to protect people and pets. This proposal does not prohibit one use over the other but instead allows everyone to safely access these places knowing where it is free of traps and where traps may be placed.



Submitted By  
Dianna Whitney  
Submitted On  
2/24/2015 11:19:26 AM  
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**I SUPPORT Board Game Proposal 180 - Cooper Landing Area.** Because trails are multi-use, efforts must be made for the safety of those using trails and roads. A 250 foot "safety zone" along roads and trails is necessary and reasonable to protect people and pets. This proposal does not prohibit one use over the other but instead allows everyone to safely access these places knowing where it is free of traps and where traps may be placed.

Submitted By  
Duncan Keith  
Submitted On  
2/21/2015 3:12:13 PM  
Affiliation



PC126  
1 of 1

Recently I saw the prince william sound black bear highlight on KTUU news. They mentioned the Board of Game was considered doing something about the harvest numbers of black bears in prince william sound. As someone who has hunted for spring black bear in the western, northern, and eastern sound, I can assure you the population of bears has dropped significantly since I began hunting in the sound. Before 2010, you could hunt for 5 days and see upwards of 20 bears including a few nice trophies. Now in that same period of time, you see about 5 bears, all of which are quite small. I rarely see bears over 6 feet now. When talking to other hunters they say the same things; no big bears and fewer bears. I also looked at the published harvest data and was surprised to see how high of a percentage consisted of females. I agree that something needs to be done with the amount of hunters now coming through the Whittier tunnel. Preservation of resources for continued use is always the right choice.



Submitted By  
Jacky Graham  
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2/24/2015 11:32:57 AM  
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I SUPPORT Board Game Proposal 180 - Cooper Landing Area. I do not own a dog nor do I trap or hunt. Trails are used by multiple users. Placing traps on trails, is in my opinion, a form of "cheating." It is a documented fact that Game use trails for easier travel, rather than doing their own bushwacking. They take the path of least resistance. A 250 foot "safety zone" along roads and trails allows safe passage to all and in my opinion is a far more sporting thing to do. The safety of people and pets is tantamount.

Submitted By  
Janette Cadieux  
Submitted On  
2/23/2015 10:02:51 AM  
Affiliation



PC128  
1 of 1

As a resident of Cooper Landing, AK, I am writing in support of Proposal 180 currently before the Board of Game (BOG). Why common sense regulation such as this must be put forward as a community proposal and not generated as rules and regulations by the BOG itself I do not understand. If the BOG does not have adequate process and rules to regulate an enterprise such as trapping, then it should not be issuing permits for trapping. Without proper regulation such as Proposal 180, the State of Alaska has wrongly selected one user group over another.

Whether a user wants to hunt with a dog, take his child off trail to teach her about the habitat that surrounds her, or just wants to encounter and admire wildlife in a healthy, balanced ecosystem, this should be as valid a use as trapping and therefore should have protections that allow the user to safely engage in that activity. Since trapping is a commercial enterprise the burden should be on trappers to avoid negatively impacting other users in the area. After all, access is a state residents' right, but commercial use of a public resource is a privilege. We do not leave it to commercial fisherman to self regulate. I do not understand why the BOG would think it appropriate for the trappers to self regulate. Why is it that respect for other users is a part of the Alaska Trappers Association's listed ethics and recommended by the State of Alaska Fish and Game Department, but it is not required? That is patently inadequate and must be amended, if not by Proposal 180, then by statewide regulation instead. Nothing else will do.

I recently read *Walter's Story* by Barbara Atwater about her native family member from the Iliamna Lake region. Even when villages were few and far between, trappers traveled far afield to work their trap lines. They didn't trap near the village!



Submitted By  
Rachel Hatcher  
Submitted On  
2/27/2015 7:44:28 AM  
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I support Board Proposal Board 180 - Cooper Landing Area because trails need to be made safe for both humans and their domestic pets and 250 foot safety zone is very reasonable.

Thank you!

Submitted By  
Sylve Montalbo  
Submitted On  
2/23/2015 10:37:31 AM  
Affiliation



PC130  
1 of 1

I have property in Cooper Landing. My family and family dogs like to spend time roaming the woods around our property. Recently signs have gone up in our neighborhood indicating conflict with some trapper. I do not want traps set anywhere near homes, schools, businesses, trails, in our community. There is certainly enough open space in Alaska that trappers do not need to set traps near communities in any part of Alaska. I support the Proposal 180 from Cooper Landing to the Board of Game and any changes that need to be made to trapping laws to protect innocent

people or their pets from traps.

in Cooper

Landing

Submitted By  
Theo Lexmond  
Submitted On  
2/23/2015 9:25:31 AM  
Affiliation



PC131  
1 of 1

My name is Theo Lexmond. I am a resident of Cooper Landing and am writing in support of **Proposal 180: "A proposal for trapping restrictions in Cooper Landing as enumerated by roads, multi-use trails and campgrounds, and specific special area closures."** It is the purpose of this proposal to address several key questions about the conflict that exists between trappers and non-trappers in our community.

Why is it permissible that a trapper driving through Cooper Landing can take any pullout off of the Sterling Highway, such as the ones that parallel Quartz Creek, can lay down a line of traps just feet from the edge of that pullout, and moments, hours or days later, any motorist passing through, who uses that same pullout to stop and admire the views, and let his or her pet out to tinkle, can have their pet caught in a trap?

Why is it that any trapper can lay traps just a foot from the edge of one of the beautiful trails that lead from the heart of Cooper Landing, up into the mountains or along the rivers, thereby making it incredibly dangerous for any young family that wants to go out and use that same trail to let their toddlers and pets play in the snow and enjoy the day?

Why is it that we must live with this situation year after year, when both the Alaska Trapper's Association, in its Code of Ethics, and the Alaska Department of Fish and Game, in its rulebook for trappers, identifies such behavior as unethical? We live with it because, although it may be unethical, it is not illegal. You, the Alaska Board of Game, permit this situation to persist. We are fed up with it. We are not unreasonable people. We are not anti-trapping. I own a cabinet full of fur supplied by trappers that I use for tying flies. We want reasonable protections for all of the other people who use multi-use areas of our community like roads and trails. We want regulations that match the ethical standards of the Alaska Trappers Association and the recommendations of the Alaska Department of Fish and Game, so that unethical trappers can be punished for persistently endangering their fellow citizens by their unethical choices to trap in places where pets and small children can be caught.

It is ridiculous that one user group that practices an activity that is dangerous to the pets or small children of other user groups has their dangerous activity protected, while the rights of others to use that same public land go unprotected under the law. I recognize that the Board of Game believes they have no responsibility to deal with "social issues." But when your management of how game is taken creates a "social issue," you become responsible whether you care to admit it or not.

Please adopt our request for regulatory relief. Please adopt Proposal 180. Trapping and other outdoor activities can coexist. But they can only coexist if the rights of all user groups are respected and protected.

Submitted By  
Jennifer McCombs  
Submitted On  
2/24/2015 1:57:32 PM  
Affiliation  
Premier Alaska Tours



PC132  
1 of 1

I SUPPORT Board Game Proposal 180 - Cooper Landing Area. Because trails are multi-use, efforts must be made for the safety of those using trails and roads. A 250 foot "safety zone" along roads and trails is necessary and reasonable to protect people and pets. This proposal does not prohibit one use over the other but instead allows everyone to safely access these places knowing where it is free of traps and where traps may be placed.

Submitted By  
Mike Daigneault  
Submitted On  
2/25/2015 9:49:22 AM  
Affiliation



PC133  
1 of 1

Proposal 202 regarding Western Arctic and Teshekpuk Caribou

ADF&G has a statutory responsibility under AS 16.20.690 to annually provide the legislature with a list of critical habitat areas. To protect these herds for the long run, ADF&G needs to complete it's due diligence and identify critical calving, feeding, overwintering, or migratory areas for these herds; they should submit this list for legislative approval as soon as possible.

Submitted By  
Michael Hawley  
Submitted On  
2/24/2015 1:00:46 PM  
Affiliation



PC134  
1 of 1

I am a year round resident of Cooper Landing. I own/operate a small fishing guide business on the Kenai River. I am an avid outdoorsman who utilizes the access to public lands and waters on the Kenai peninsula for recreation. I do not support the exclusion of any user groups on public lands in my community. I do not support Proposal 180.

Submitted By  
Matthew Keith  
Submitted On  
2/20/2015 4:08:02 PM  
Affiliation



PC135  
1 of 1

I saw the KTUU piece on possible emergency order for PWS Black Bear. Having hunted the Western, Northern and Southern Sound extensively for more than a decade (every spring and many falls). I can tell you that the number and size of black bear is precipitously lower. We have noticed this change for several years. We have also seen a dramatic increase in hunting pressure with more people and more people getting farther out into the the more remote places in the Sound. We no longer expect to see several bears over 6 foot in the course of a week-long hunt like we used to, making it no surprise that more novice hunters are killing so many sows. In fact we often go the whole trip without seeing a single large "trophy" size boar. We often see Troopers when out in the Sound and ask them if they are seeing large boars and are told the same thing - no or very rarely. Just so we are clear, we don't just drive around in the boat drinking coffee and glassing beaches, we silently kayak all the nooks and crannies. The problem is not data collection artifact, it is real.

I hate to see the hunt limited, but it is clearly in trouble and the population requires some protection so we can hunt it for years to come with an Alaska level quality population.



Submitted By  
Lynne' Doran  
Submitted On  
2/24/2015 9:25:49 AM  
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I SUPPORT Board Game Proposal 180 - Cooper Landing Area.

Because trails are multi-use, efforts must be made for the safety of those using trails and roads. A 250 foot "safety zone" along roads and trails is necessary and reasonable to protect adults, children and pets using our trails and roads. This proposal does not prohibit one use over the other but instead allows everyone to to facilitate these places knowing where it is free of traps and were traps may be placed.



Submitted By  
Laura Ashlock  
Submitted On  
2/23/2015 10:45:29 AM  
Affiliation

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Why is there any question that hunting for these caribou herds should be shut down? With herds half of what they were 13 years ago they need time to re establish their herds. It reminds me of 40 years ago when King Crab had to be shut down...a few years later it was reinstated, and today the size of them is that of juniors...I have yet to see full grown crabs. Indicates that once again this species is being over fished.

Alaska has renewable resources. Don't let them become extinct. If disease is increasing due to the climate warming, then why would you all not immediately close hunting down instead of putting additional stress on the herds?



Submitted By  
William Clay  
Submitted On  
1/15/2015 1:35:36 PM  
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Good Day Board of Game.

I would like to ask that you explore the idea of addressing an issue of a long term resident of Alaska who has just moved to another state for work. I have lived in Alaska for many years and have been a bear hunter (along with fishing and Moose) for years. The regulations state that since I have been required to establish my residency in another state, I lose the ability to not need a guide to hunt Brown Bears. A guide would be needed and I understand the reasoning for someone who has never hunted here before, but it seems to me that if you have been a long time resident and have hunted them before (and can prove it by expired hunting licenses still in possession), why should I have to use a guide to be with me when I have hunted them as a resident before? I would gather that the Guides would like to have my money, but GMA 13 are chock full of Brownies. I have a 2014, 2013, 2012, etc. still in my possession and was also an employee of ADF&G. The last thing I want to do is be illegal, but I think two years grace period (pay the non-resident tag), but remove the requirement for a guide for Brown Bear would be reasonable. Proof must be provided (Muni Tax Bills, Length of Employment verification from Human Resources, Expired Resident Licenses, Copy of your Drivers Licenses, Etc.)

Best regards,

William Clay

Chugach Alaska Corporation

Huntsville, AL



Submitted By  
Jason Bickling  
Submitted On  
1/26/2015 3:44:53 PM  
Affiliation

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~~To whom it may concern:

My name is Jason Bickling and I am a resident of Seward. This letter is in reference to Proposal 181 - 5 AAC 91.095: proposed by Mark Luttrell on unlawful methods of taking fur bearers. I am adamantly against this proposal for a number of reasons.

Mr. Luttrell's proposals for these areas are: 1. unjustified and unwarranted in their need and 2. are far too restrictive and create barriers for certain user groups.

The recent issues that have been discussed about dog and human safety are from an incident(s) that occurred in Cooper Landing. The issue needs to be addressed at that area – not blanketing all areas in reaction to incidence(s) there. Mr. Luttrell is very vocal in our community about his anti-trapping and anti-hunting stances. I believe this proposal has more to do with his personal viewpoints than anything.

My family is an outdoors family. My wife is an avid runner and hiker and she takes our dog on Lost Lake trail and many other trails as well on a nearly daily basis. Year round, we hike regularly with our two kids and our dog. I ride my mountain bike and fat bike with my dog - I log over 600 miles a year on my bikes (year round) the Iditarod sections between Nash road and Primrose. I make the traverse from Nash Road to Bear Lake a couple times a week usually on my fat bike and there is no foot traffic whatsoever on 80 percent of the trail. We have never had an incident with our dog and don't know anyone who has on these sections that we spend so much time on.

I have an 8 year old son and a 5 year old daughter and we trap as a family. It is a good way for us to get out and enjoy the woods a couple times a week throughout the long winters. We spend significant time on the Iditarod trail between Nash Road and Bear Lake because it is just out of our backyard. We have trapped successfully and safely back in that section for a few years now without having any kind of domestic bi-catch in our traps nor people harmed. We make sure that all of our traps are off trail where they will not be seen or found by a hiker or their dog. Given the proposed regulation, having to set each trap 250 feet off of this trail would make trapping prohibitive for my young kids. The terrain along our section of the trail is very scrubby /brushy with significant devils club. It is hard enough to get our sets off the trail enough to where they aren't see / difficult to be found (for human or animal), which we do as practice anyway. Making it a minimum 250 feet, taking an extra 500 off trail feet for every trap (there and back), would make it prohibitive for my young kids to fully participate in this outdoor recreation until they are much older, especially in years of heavy snow. I'm also sure that this minimum distance would also have an effect on elder or handicapped trappers in the area. Again, I believe this is unwarranted as even in this low snow year, there is very little traffic from humans or dogs (much less families) once you get about half mile off of Nash Road. There are only a few months out of the year that we are allowed to trap – the proposed regulation would more or less take away my kids' access to this outdoor sport that they enjoy for just a short time each year.

By running a trap line off of a recreational trail, it does not prevent equitable access to non-hunters or non-trappers. I freely take my family on a majority of the mentioned trails (many on which trap lines exist) without fear of my dog or my kids getting caught in a trap or snare. To say that when trappers or hunters use a trail it prevents access to others is completely untrue.

I also don't understand why Mr. Luttrell is proposing #3 leg hold traps only. Connibears (110s, 120s, 155s, etc) for marten, weasel, mink, etc. are also traps that have no chance of getting a dog or child into them, especially as they are usually mounted a ways up on a tree or pole. This proposal would also inhibit us from using underwater otter or beaver sets using 220s or 330s in waters nearer than 250 from the trail. These trapping set-ups are also ones that are non-threats to dogs or humans.

I would please ask the Board of Game to vote NO on this proposition. The need for it has not been demonstrated AND Mr. Luttrell's blanket proposition takes away equitable use for many who have different outdoor interests than himself. Thanks for your time and consideration.



Submitted By  
Guy Sachette  
Submitted On  
1/7/2015 10:17:59 AM  
Affiliation

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ATTN: Board of Game Comments

January 7, 2015

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Regarding Proposal 194 – 5 AAC 92.080.

I am a devout Alaskan bird hunter, a versatile hunting dog owner, an outdoor enthusiast, a conservation-minded supporter of responsible game management, and a concerned citizen who object's to this possible new regulation. I take exception to Mr. Barrette singling out upland bird hunters specifically as this in my mind is a blatant form of discrimination.

While I do not currently trap, I did while growing up in the Appalachian mountains of Pennsylvania. I believe there's a shared responsibility by both users in this situation to avoid inadvertent catches of domestic animals. Just last week a close friend [non-bird hunter] of mine had his dog trapped at a very public access point just off a local trailhead. Clearly this was an inappropriate spot to trap. When I did trap, I always set my traps with consideration for domesticated animals and through my 10 years or so, never caught something I wasn't specifically targeting. Successful trappers have a keen sense of the land and should be able to recognize and avoid potential problem areas such as the one mentioned above.

Prohibiting the use of hunting dogs for taking upland game birds after October 31 in the Southcentral Region would significantly reduce days afield as the season opens August 10th or in some areas after Labor Day. Anyone who hunts birds would tell you the beginning [first few weeks] of the season is poor at best as broods are still grouped and difficult to hunt. Protective hens act very differently during this time, commonly running with their younger birds in tow sometimes for great distances to elude dogs. This said, the core [most productive] part of the season would be limited to approximately 6 weeks total.

I love my dogs and the last thing I want to have is one injured or killed in a trap. This proposal severely degrades both dog handler and dog's quality of life by severely restricting day afield. We spend many hours and many dollars throughout the year preparing/training our dogs for a season that typically shuts itself down way too early due to deep snows.

While I want to believe Mr. Barrette had good intentions with this proposal, he's off the mark when it comes to what resembles lower 48 politics. There's plenty of territory here for both user groups here in Alaska. As populations continue to grow, my fear is, life as we know it in the Last Frontier is taking on the very image of the reason [to escape competition of limited resources] I moved back here when I retired from the military nearly 4 years ago.

Please consider my request to not approve this proposal.

Respectfully,

Guy L. Sachette

Guy Sachette

Eagle River, Alaska



Submitted By  
yvette galbraith  
Submitted On  
2/25/2015 1:16:38 PM  
Affiliation  
cooper landing resident

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po box 866  
Cooper Landing, Alaska 99572

**I SUPPORT Board Game Proposal 180** for our Cooper Landing Area. Because these trails are multi-use, efforts must be made for the safety of all of those using trails and roads. A 250 foot "safety zone" along roads and trails throughout Cooper Landing is necessary and reasonable to protect people and pets. This proposal does not prohibit one use over the other but instead allows everyone to safely access these places knowing where it is free of traps and where traps may be placed.

Thank you.

Submitted By  
Anne Hope  
Submitted On  
2/25/2015 2:03:52 PM  
Affiliation



PC142  
1 of 1

I SUPPORT Board Game Proposal 180 - Cooper Landing Area. Because the trails are multi-use, efforts must be made for the safety of those using trails and roads. A 250 foot "safety zone" along roads and trails is necessary and reasonable to protect people and pets. This proposal does not prohibit one use over the other but instead allows everyone to safely access these places knowing where it is free of traps and where traps may be placed.



Submitted By  
Linda  
Submitted On  
2/25/2015 4:57:39 PM  
Affiliation  
none

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Anchor Point, Alaska 99556

Dear Board,

I have watched over the last 40 years as a small group of people in Alaska were responsible for ruining our crab, then destroying our shrimp, then the halibut became mushy and the salmon decreased in numbers so badly that I have not seen the runs fill our rivers in many many years. We were over run by rabbits that destroyed our land but our predators were destroyed and even seeing a wolf or a coyote is almost a miracle.

Perhaps we need to cut back the horrid attempts of your " board" messing with our wildlife and in doing so will be giving it a break. Thereby, letting the wildlife recoup, and replenish, and even out the system, that pardon the expression," God made for us". Heaven knows your board is not made up of gods and have not been very adept at keeping Alaska the great place it once was.

Back off, stop wasting our resources , our dollars , our fuel, our totems, our food and our love of Alaska..

Sincerely,

Linda Feiler

Submitted By  
Virginia Morgan  
Submitted On  
2/25/2015 7:55:45 PM  
Affiliation



PC144  
1 of 1

I SUPPORT Board Game Proposal 180 - Cooper Landing Area. Because the trails are multi-use, efforts must be made for the safety of those using trails and roads. A 250 foot "safety zone" along roads and trails is necessary and reasonable to protect people and pets. This proposal does not prohibit one use over the other but instead allows everyone to safely access these places knowing where it is free of traps and where traps may be placed.

Submitted By  
Sandra Holsten  
Submitted On  
2/25/2015 8:41:23 PM  
Affiliation  
None



PC145  
1 of 1

I strongly support at least this minimum setback from trails. I also want larger no trapping zones so I can subsistence bird hunt. Hard to hunt a bird dog on a leash.

someday a kid is going to get seriously injured in the larger traps as they get set and left and snow covers them up.

Truly don't understand why a few people can ruin the hiking and wildlife viewing for the rest of us. Why force the proponents of this measure to keep spending hours on this measure when any rationale person can see it will eventually happen and when it does it will be far more restrictive than this very modest proposal.



Submitted By  
Atkinson  
Submitted On  
2/25/2015 8:50:10 PM  
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Resident

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Cooper Landing, Alaska 99572

This is the best thing I've heard in years. Please make trappers responsible.

creating a 250 foot safety zone prohibiting trapping around trails and public roads in Cooper Landing (trappers would be able to lay traps beyond the 250 foot area, currently they can set traps on trails).

This proposal (Board Game Proposal 180) is for Cooper Landing but hopefully if a 250 Safety Zone could be established in Cooper Landing a precedent could be set for other neighborhoods to protect pets and children.



Submitted By  
Daniel Jirak  
Submitted On  
2/25/2015 9:12:04 PM  
Affiliation

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Wasilla , Alaska 99654

To Whom, It Might Concern,

I am writing in reference to proposals 207 and 208. I have hunted sheep in Alaska for the last 9 years and also own and use a private airplane for my hunting purposes. I have been in Alaska for the last 16 years and spent 8 years in the guiding industry. I also hunt other states and put in for non-residents tags draws across the western states year after year.

I am opposed to Proposal 207 to further regulate the use of aircraft for sheep hunting. #1 would be impossible to enforce and #2 & #3 will not address the problem of harassing game during hunting season. Stricter fines/enforcement of game harassment is a better solution to "picking your 40" sheep with an airplane".

Proposal 208

I am against the restriction of resident hunters without first restricting non-residents. In other states that have limited resources to hunt that I apply for, I am lucky if the state gives 15% of the harvest to nonresidents most of them are 10%. In Alaska we allow around 40% of the harvest to non-residents and in some of the most crowded areas it's greater than 50% of the take to non-residents.

Though not covered in these two proposals, I fully support resident sheep hunters paying higher fees for tags to make up for the limiting of non-residents.

**The BOG should take a serious look at making all non-residents draw and removing the guide requirement for dall sheep, brown bear and goat. This regulation, along with the governors tags make this a rich mans sport which is unconstitutional.**

Thank you,

Dan Jirak



Submitted By  
Reggie Joule, Mayor  
Submitted On  
2/27/2015 9:19:50 AM  
Affiliation  
Northwest Arctic Borough

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Kotzebue, Alaska 99752

February 27, 2015

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

Subject: Support Proposal 202 as Amended

Dear Members of the Board of Game:

The Northwest Arctic Borough submits these comments on Proposal 202 regarding limitations of the hunting seasons and limits for caribou. Caribou provide a critical subsistence resource for the people of the Borough, and as a result of the precipitous decline in the Western Arctic Caribou Herd, Borough residents have had difficulties obtaining sufficient numbers of caribou to feed their families in recent years. This situation is compounded by the fact that our region has one of the highest costs of living and one of the highest unemployment rates in Alaska.

On behalf of the Borough, I wish to support the position on Proposal 202 approved by the Kotzebue Sound Fish and Game Advisory Committee at its January 6, 2015 meeting. In summary, implementation of that position would close the non-resident season completely and close the bull caribou opening from October 15 – January 15. It would also increase the closure of the cow season from April 15 through June 30.

These measures are necessary to respond to significant declines in the Western Arctic Caribou Herd. During the ten-year period between 2003 and 2013, the year when the herd was last counted, there has been a 50% decline in the population. Between 2011 and 2013 alone, there was a 27% decline in the herd.

Thank you for this opportunity to comment on Proposal 202. Please contact me if you have any questions about this letter.

Sincerely,

Reggie Joule  
Mayor



Submitted By  
Stephen  
Submitted On  
2/26/2015 10:10:35 AM  
Affiliation

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3208 19th Road, N.  
Arlington, Virginia 22201

Please support proposals 180 and 181.

Trapping should be restricted in these areas, that are used by recreational users such as myself.

Thank you.



Submitted By  
Stephen Bartell  
Submitted On  
2/26/2015 10:07:23 AM  
Affiliation

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Arlington, Virginia 22201

I strongly support Proposal 170. It is apparent that the population of bears is declining and in trouble. I encourage you to take action to protect this population of bears, for tourists such as myself, who do not hunt the bears.

Thank you.



Submitted By  
Stephen Bartell  
Submitted On  
2/26/2015 10:13:56 AM  
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Oppose Proposal 150.

Please do not establish the proposed permit hunt for antlerless moose in the Kincaid Park, which is heavily used by recreational users and tourists such as myself.

Thank you.

Submitted By  
Tasha Jeffords  
Submitted On  
2/26/2015 1:36:11 AM  
Affiliation



PC150  
1 of 1

I am against proposal 180. I think this issue needs more discussion and time to work out kinks before a decision is made. My main concern as a trapper is what would be defined as a trail? There are many trails in this area .