



INTERIOR REGION PROPOSAL COMMENTS
BY AHTNA TENE NENE' C&T COMMITTEE

Gloria Stickwan for Eleanor Dementi



Regional/ Multiple Unit Proposals

Proposal 46 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions. Reauthorize resident brown bear tag fee exemptions in the Interior/Northeast Arctic Region as follows: By Alaska Department of Fish & Game.

- (a) A resident tag is not required for taking a brown bear in the following units:
- (4) Units 12, 19, 20, 21, 24, 26, 26(B), and 26(C)

Comments:

We support Proposal 46 to reauthorized resident brown bear tag fee exemption in Interior Region in Unit 12. Eliminating tag fee will increase hunter participation in hunting for brown bears and harvesting them. Brown bears kill calves of moose and caribou. Brown bears should be harvested to reduce killing of calves. Additionally, brown bears in Unit 12 are considered to be at a healthy population.

Proposal 47 – 5 AAC 92.990(26) Definitions. Change the definitions of “edible meat” for all game birds as follows: By Central Kuskokwim Fish and Game Advisory Committee.

“edible meat” means, in the case of a big game animal, except a bear, the meat of the ribs, neck, brisket, front quarters, hindquarters, and the meat along the backbone between the front and backquarters; in the case of a bear, the meat of the front quarters and hindquarters and meat along the backbone (backstrap); **For all game birds, the meat from the breast, back, thighs, legs;** [IN THE CASE OF SMALL GAME BIRDS, EXCEPT FOR CRANES, GEESE AND SWAN, THE MEAT OF THE BREAST; IN THE CASE OF THE FEMUR AND TIBIA-FIBULA (LEGS AND THIGHS);] however, “edible meat” of big game or small game birds does not include meat of the head, meat that has been damaged and made inedible by the method of taking, bones, sinew, incidental meat reasonably...

Comments:

We support Proposal 47 to change the definition of “edible meat” for all game birds to include the meat from the breast, back, thighs, and legs; included for human use would be wings, gizzard, and heart; optional parts would be head, neck, feet, and other internal organs and skin.

Wanton waste occurs when game birds are harvested and parts of game birds are discarded and thrown away. Edible parts of small game



birds should be included to use all parts of small game birds. Non-edible parts can be used for trapping purposes, too.

Proposal 48 – 5 AAC. 92. 080. Unlawful methods of taking game; exceptions; and 92.085 Unlawful methods of taking big game; exceptions. By Howard Delo. Allow the use of crossbows in restricted weapons hunts as follows:

In order to allow more opportunity for those hunters wishing to use a crossbow while hunting during special hunts like the roadside “targeted hunts” for moose in Southcentral and the Interior, or while hunting in specific game management areas or state refuges around the state where either muzzleloaders or shotguns and bow and arrow are the approved hunting tools, I would like to ask the Board of Game to include the use of crossbows as a fourth approved hunting tool.

Comments:

We oppose adding crossbows to unlawful methods of taking game regulations. Adding another method as a hunting tool will promote additional specific hunting areas, and more hunting seasons and dates, especially, in Unit 12 Game Management Unit areas. Specialized hunting areas and hunting season dates would have to be created to allow another hunting tool to be used while hunting.

Proposal 49 – 5 AAC 92.130. Restrictions to bag limits. Remove the bag limit. Remove the bag limit restriction for resident relatives accompanying nonresident second degree of kindred as follows: By Kyle Jones.

This new regulation does not solve any issues in the Arctic, Western, Interior or Eastern Arctic regions and Units 12, 18, 19, 20, 21, 22, 23, 24, 25, 26A, 26B, and 26C should be excluded from the regulation.

Comments:

We oppose Proposal 49 to remove the bag limit for resident relatives accompanying nonresident second degree of kindred. Brown bears, mountain goats, and sheep taken by nonresident hunters that are accompanied by resident relative should apply to both of their bag limits. Bag limits of guided species should apply to both resident relatives and non-resident relatives to protect Mountain Goats and Rams in Interior/Northeast Arctic Regions.

Proposal 50 – 5 AAC 92.130. Restrictions to bag limit. Remove the bag limit restriction for resident relatives accompanying nonresident second degree of kindred for the Interior Region as follows: By Chris Harper.



Everyone who wishes to hunt in a nonsubsistence area should have equal opportunity to pursue the “guided” species of Alaska. While I believe that proposal 51 should be repealed statewide, in the setting of an Interior board meeting, I propose that recently passed proposal 51 should not apply to this region.

Comments:

See comments under Proposal 49.

Proposal 51 – 5 AAC 85.045. Hunting seasons and bag limits for moose; and 85.055. Hunting seasons and bag limits for caribou. Prohibit nonresident hunting of any prey species under intensive management in the Interior/Northeast Arctic Region until harvest and population objectives are met as follows: By Resident Hunters of Alaska.

Nonresident hunting shall not be allowed for any prey species in the Interior/Northeast Arctic Region under an intensive management (IM) predation control plan until the minimum IM population and harvest objectives for that prey has been reached.

Comments:

We support Proposal 51 to dis-allow Non-residents hunting in IM areas for moose and caribou. Intensive Management is set up to enhance moose and caribou populations, so that Resident hunters could harvest moose and caribou. Non-Resident hunters should not be allowed to harvest a moose or caribou, if IM Plan is active. If the Department determines that moose and caribou population objectives has been met for moose and caribou, then Non-Residents should not be allowed to hunt. Resident hunters harvest moose and caribou to put food on the table, Non-Resident hunters only do sport hunting.

Proposal 53 – 5 ACC 85.025. Hunting seasons and bag limits for caribou. Clarify the resident general and subsistence hunting seasons and the nonresident general hunting seasons for caribou in Interior/Northeast Arctic and the Arctic/Western Regions as follows: By Al Barrette

	Resident	
NonResident		
	Open Season	Open
Season		
Unit 12, that portion west of the		



Glenn Highway (Tok Cutoff) and South of the Alaska Highway open season within Tok River drainage	Sept.1-Sept. 20	No
	<u>Subsistence</u>	

1 bull

1 bull by registration west of the Glenn Highway (Tok Cutoff) and south of the Alaska Highway, excluding the Tok River drainage open season	Sept. 1- Sept. 20	No
---	-------------------	----

Subsistence

Remainder of Unit 12 1 caribou may be taken by open season Registration permit only During a winter season to be announced by emergency order	(Winter season to Announced)	No
--	---------------------------------	----

Comments:

We oppose Proposal 53 to change 5 AAC 85.025 Clarify the resident general and subsistence hunting seasons and the nonresident general hunting seasons for caribou in Interior/Northeast Arctic and the Arctic/Western Regions.

We do not support changing “general season” to “subsistence hunt” for Interior Region - Unit 12 and Unit 20 - Caribou hunts having positive C&T use findings.

General hunt is not a subsistence hunt. General Hunt is a “sport Hunt”. General Hunt doesn’t have C&T uses, nor is it understood in its’ meaning to have a C&T pattern of uses or “way of life”. Subsistence Users have a pattern of C&T uses that is the difference between a General Hunt and a subsistence hunt.

Subsistence Hunts, such as Unit 12, will be negatively affected by this proposal. ANS will have to be re-evaluated, if this proposal is passed by ABOG. Unit 12 Caribou hunt may end up as a “sport hunt”.

With cut backs to ADFG’s administration, funds are not available to undertake a huge change to Chapter 85 regulations.

Proposal 54 – 5 AAC 85. 015. Hunting seasons and bag limits for black bear. Change “general season” to “subsistence hunt” for



Interior/Northeast Arctic Region black bear hunts having customary and traditional use findings as follows: by Al Barrette.

Units and Bag Limits	Resident	
NonResident		Open
Season	Open season	
Units 12, 18, 19, 20 outside the Fairbanks nonsubsistence area, 21, closed season	No closed season	No
22, 23, 24, 25 (General hunt only)	[GENERAL SEASON]	

Subsistence

Comments:

We oppose Proposal 54 to change “general season” to “subsistence hunt” for Interior/Northeast Arctic Region - Unit 12 and Unit 20 black bear hunts having positive C&T use findings.

Please see comments under Proposal 53, those comments pertain to Black Bear hunts in this proposal, too.

Proposal 55 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Clarify the resident general and subsistence hunting seasons and the nonresident general hunting seasons for moose in Units 12, 19, 20, 21, and 24 as follows: By Al Barrette

Units and Bag Limits	Resident	
NonResident		Open
Season	Open season	
Unit 12 that portion including all drainages into the west bank of the Little Tok River, from its headwaters in Bear Valley at the Intersection of the unit boundaries of Units 12 and 13 to its junction with the Tok River, and all the drainages into the south bank of the Tok River from its junction with the Little Tok River to the Tok Glacier		
RESIDENT HUNTERS: 1 bull per harvest report by community harvest community harvest	Aug. 24-Aug.28	



permit only; however,
no more than 100 bulls
that do not meet antler
restrictions for other
resident hunts in the same
entire community harvest
area during the Aug. 24-Aug. 28
and Sept. 9-Sept. 17 seasons; or
1 bull with spike-fork antlers or
50-inch antler or antlers with 4
or more brow tines on one side

Sept. 8-Sept. 17
Dec. 1-Dec. 31
(Subsistence hunt only)

Aug. 24-Aug. 28
General Season
Sept. 8-Sept. 17
General Season

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or
8-Sept. 17
Antlers with 4 or more brow
General Season
Tines on one side

Sept.

Unit 12, remainder of that portion
In the Tok River drainage
Upstream from the Tok Cutoff
Bridge

RESIDENT HUNTERS:

1 bull with 50-inch antlers or
antlers with 4 or more
brow tines on one side

Aug. 24-Aug.28
Subsistence
Sept. 1-Sept.17

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or
Antlers with 4 or more brow
8-Sept. 17
tines on one side
General Season

Sept.

Unit 12, that portion lying
East of the Nabesna River
and south of the winter trail
Sept. 17
running southeast from
General Season
Pickeral Lake to the Canadian
Border

Sept.1-Sept. 30
Subsistence

Sept.8-

1 bull with 50-inch or antlers
with 4 or more brow tines
on one side



Unit 12, that portion within
the Nabesna River drainage
west of the east bank of
the Nabesna River upstream from
the southern boundary of the
Tetlin National Wildlife Refuge

12 bull with spike-fork
antlers or 50-inch or
antlers with 3 or more brow
tines on one side, by
registration permit only

Aug. 20-Sept. 17
Subsistence

NONRESIDENT HUNTERS:
1 bull with 50-inch antlers or
Sept. 17

Sept.8-

antlers with 3 or more brow
General Season
tines on one side, by
registration permit only

Remainder of Unit 12
RESIDENT HUNTERS:
1 bull
Sept. 8-Sept. 17

Aug. 24-Aug. 28

Subsistence

NONRESIDENT HUNTERS:
1 bull with 50-inch antlers or
Sept. 17

Sept.8-

antlers with 4 or more brow
General Season
on one side

Unit 20(C)

RESIDENT HUNTERS:
1 bull
Sept. 1-Sept. 25

Subsistence

NONRESIDENT HUNTERS:



1 bull with 50-inch antlers or
Sept. 25
antlers with 4 or more brow

Sept.1-

General Season
tines on one side

Comments:

We oppose Proposal 55 to change “general season” to “subsistence hunt” for Interior/Northeast Arctic Region - Unit 12 and Unit 20
Moose hunts having positive C&T use findings.

Please see comments under Proposal 53, those comments are relevant to this proposal.

Proposal 63 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions. Remove the restriction on the use of aircraft for spotting Dall sheep in the Interior/Northeast Arctic Region as follows: By John Frost.

Repeal the regulation passed by the Board-generated proposal #207 for the Interior/Northeast Arctic Region (Units 12, 19, 20, 21, 24, 25, 26B and 26C).

Comments:

We support Proposal 63 to remove the restriction on the use of aircraft for spotting Dall sheep in the Interior/Northeast Arctic Region - (Unit 12 and Unit 20). It will be difficult for Troopers to enforce. The intent of the pilot would be difficult to determine in court. No one will know if the pilot was attempting to land an aircraft in a safe manner or was trying to spot Dall sheep.

Proposal 66 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. By Michael Cronk. Open an archery-only hunting season for Dall sheep in the Interior/Northeast Arctic Region as follows:

Provide for an August 1-9 archery (conventional bows only) sheep season in all areas of the Interior and Eastern Arctic region (Units 12, 19, 20, 21, 24, 25, 26B, 26C) that are open for general (harvest tag) hunts (not for drawing hunt areas).

Comments:

We oppose Proposal 66 to open an archery-only hunting season for Dall sheep in the Interior/Northeast Region. According to ADFG, Unit 12 is the most popular place in the State of Alaska to hunt Dall sheep.



Archery-only hunt will just provide another opportunity for more hunters to hunt for Dall sheep in Unit 12. Creating another sheep hunt will reduce Ram population in Unit 12, this genetic pool of species will be taken out of the Dall sheep population.

Proposal 67 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. Lengthen the season for bear baiting in the Interior/Northeast Region as follows By Michael Cronk.

We are allowed to register bait stands on April 1, but cannot bait until April 15. The new regulation would state, you may register and place bait in the field on April 1.

Comments:

We support Proposal 67 to lengthen the season for bear baiting in the Interior/Northeast to April 1 to June 30. Hunters who bait bears should be allowed to bait on the date that they are registered to have a bait station. Bears are up and moving earlier and earlier in the season, due to thawing and warmer spring months.

Proposal 68 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the “any bull” or “one bull” to “any antlered bull” for all moose hunts in the Interior/Northeast Arctic Region as follows: by Delta Fish and Game Advisory Committee.

Change the bag limit for all “any bull” moose hunts to “any antlered bull” in those units within the Interior/Northeast Arctic Region.

Comments:

We support Proposal 68 to change the “any bull” or “one bull” to “any antlered bull” for all moose hunts in the Interior/Northeast Arctic Region. Changing regulation to “any antlered bull” moose should protect male calves (moose) from being harvested. One bull or any bull moose should be regulated so that hunters will not mistakenly harvest a male moose calf.

Proposal 69 – 5 AAC. 85.045. Hunting seasons and bag limits for moose. By Nicholas Muche, Zachri Kendl, and Kyle Moll. Lengthen the archery-only hunting seasons for moose in Unit 20 and open an archery-only hunting season for moose in all of Unit 20 as follows:

Extend the current archery only, antlered moose hunts in Unit 20 by five days from the current September 6-September 30 to September 26-October 5 and allow all of Unit 20 an archery only season for antlered moose from September 26-October 5.



Comments:

We oppose Proposal 69 to extending archery only hunt for moose in Unit 20 and to open an archery-only moose hunting season. Extending the archery only moose hunting season and opening an archery only moose hunting season will provide another opportunity for more hunters to hunt for moose in Unit 20. Influx of moose hunters in Unit 20 has steadily increased over the years. It is difficult for local hunters to harvest a moose in nearby areas, due to increased hunting pressure.

Proposal 70 – 5 AAC. 85.045. Hunting seasons and bag limits for moose. By Michael Coats. Open a resident disabled veteran season for moose in the Interior/Northeast Arctic region as follows:

I propose those hunters meeting the criteria be allowed to hunt/harvest moose under the following guidelines. For resident veterans only, for the Interior/Northeast Arctic region, any unit/sub/unit with a healthy moose population, bull/cow ratio, qualified veterans would be allowed to harvest any moose, with the exception of calf or cow with calf/calves. In areas with a poor balance/ratio of bull to cow or vice versa, the individual would be allowed to harvest whichever sex the Alaska Department of Fish and Game deemed to be best/proper. No antler restrictions would apply. Qualified veterans must be 100% service connected disabled, with a purple heart and receiving special monthly compensation. (SMC) from the Veterans Affairs. Proxy hunting for these individuals would not be allowed.

Comments:

We support Proposal 70 to open a disabled resident veteran's hunting season for Bull Moose or Cow Moose without calves in the Interior/Northeast Arctic Region, if moose population can be sustained. There may not be too many disabled resident veterans who would participate in such a moose hunt. Disabled veterans should be allowed to hunt for moose and harvest a moose to feed themselves and/or their families.

Proposal 71 – 5 AAC 92.080. Unlawful methods of taking game; exceptions; 92.085. Unlawful methods of taking big game; exceptions; and 92.990. Definitions. By Jim Sackett. Allow the use of crossbows in archery hunts in Unit 20 for hunters over 60 as follows:

Alaska residents 60 years and older in possession of a permanent identification card are authorized/allowed to use a crossbow in any archery designated hunt in Unit 20.



See comments under Proposal 48.

Comments:

Proposal 72 – 5 AAC 92.095. Unlawful methods for taking furbearers; exceptions, and 92.110. Control of wolves. Allow the harvest of wolf and coyote by land and shoot with a trapping license in the Interior/Northeast Arctic Region as follows: By Coke Wallace.

Allow land and shoot means for harvesting of wolves and coyotes and in Unit 12, 13, 19, 20, 21, 24, 25, 26B and 26C on a trapping license for both residents and nonresidents during the regular trapping season.

Comments:

We support with amendment to Proposal 72 to allow harvest coyotes by residents by land and shoot means with a trapping license in the Interior/Northeast Arctic Region. Coyotes prey upon small game and upland birds, land and shoot means will diminish its' increasing population.

Non-residents should not be allowed to land aircrafts and shoot coyotes in Alaska. Non-residents do not have hunting experiences in Alaska to land an aircraft and shoot coyotes.

Proposal 73 – 5 AAC. 92.990. Unlawful methods of taking fur animals. By Delta Junction Fish and Game Advisory Committee. Allow the use of dogs to hunt coyote in Unit 20 as follows:

Dogs may be used to hunt coyote in Unit 20.

Comments:

We support Proposal 73 to allow the use of dogs to hunt coyotes in Unit 20. Although, hunting with dogs, with their constant barking, may chase away coyotes. More coyotes must be killed to protect upland birds and small game.

Tok Area Proposals

Proposal 84 – 5 AAC 84.270. Furbearer trapping. Lengthen the trapping season for wolf in Units 12 and 20E as follows: by Upper Tanana Fortymile Fish and Game Advisory Committee.

Change the opening date of the Unit 12 and 20E wolf trapping season to October 1.



Comments:

We support Proposal 84 to lengthen the trapping season for wolf in Units 12 and 20E, to October 1 to April 30. There is no conservation concern for wolves in Unit 12. Lengthening trapping season for wolf will provide more opportunity for trappers to trap wolves. Wolves prey upon calves of moose and caribou, wolf population should be reduced to maintain a healthy abundance of moose and caribou and other wild game.

Proposal 85 – 5 AAC 85. 025. Hunting seasons and bag limits for caribou. By Aaron Bloomquist. Open a resident drawing hunt for caribou (Nelchina) in Unit 20E as follows:

Unit 20E, south of an east/west line running through the West Fork bridge on the Taylor Highway
(Lat 63.89) N):
One caribou by drawing permit (residents only)
September 1-September 30 and October 21-March 31.

Comments:

We oppose Proposal 85 to open a drawing hunt for Nelchina Caribou Herd in Unit 20E. The proponent proposes a drawing hunt, a drawing hunt is not a subsistence hunt. A Draw hunt or any hunting season for Nelchina Caribou Herd should not be opened to Residents in Unit 20E. Mingling of caribou herds is not a good reason to open caribou subsistence hunts to residents.

A severe winter could bring the Nelchina Caribou Herd down to its management objectives, and also bring the caribou population down below management objectives. Opening a draw hunt is not advisable, it is against subsistence statutes.

Proposal 88 – 5 AAC. 85.045(a)(10). Hunting seasons and bag limits for moose. By Alaska Dept. of Fish and Game. Clarify the boundary of the Unit 12 antler-restricted moose hunting area within the Tok River drainage as follows:

Resident		Open
Season		
(Subsistence and Units and Bag Limits Season	Nonresident General Hunts)	Open

(10)



Unit 12, remainder of that portion
In the Tok River drainage upstream
of a line from Peak 5885 at 63°
9.243 N. lat., 143° 24.248 W. long., to
Milepost 105 of the Tok Cutoff Highway
At 63° 7.438' N. lat., 143° 18.135 W. long.,
then south along the Tok Cutoff Highway
to the Little Tok River Bridge
at Milepost 98.2; and within the
Little Tok River drainage
Upstream of the Little Tok River
Bridge at Milepost 98.2 [FROM THE
TOK CUTOFF BRIDGE].

RESIDENT HUNTERS:

1 bull with spike-for antlers Aug. 24-Aug. 28
or 50-inch antlers or antlers Sept. 8-Sept. 17
with 4 or more brow tines
on one side.

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or Sept.
8-Sept. 17
antlers with 4 or more brow
tines on one side.

Comments:

We support Proposal 88 to clarify the boundary of Unit 12 antler-restricted moose hunting area within the Tok River drainage as proposed in this proposal. Modifying boundary will give public and enforcement clear understanding where Unit 12 boundary is.

Proposal 89 – 5 AAC 85.045 Hunting seasons and bag limits for moose. By Upper Tanana/Fortymile Fish and Game Advisory Committee. Change the antler restrictions for moose in Unit 12 as follows:

A legal bull moose is spike/fork, 50-inch antlers or a bull with no more than two brow tines on either side if under 50-inch antlers excluding hunt RM291 (along Nabesna Road).

Comments:

We support Proposal 89 to change the antler restriction for moose in Unit 12 to spike-fork, 50 inch antlers or a bull with no more than two brow tines on either side if under 50-inch antlers. There is no



conservation as of now. Changing antler restrictions to 2 brow tine will aide moose population to grow into larger bull population.

Proposal 90 – 5 AAC.92.074(d) Community subsistence harvest hunt areas. By Ahtna Tene Nene’ Customary and Traditional Use Committee. Expand the Community Harvest Area for moose and caribou: Includes all of:

(2) that portion including all drainages into the west bank of the Little Tok River, from its headwaters in Bear Valley at the intersection of the unit boundaries of Unit 12 and Unit 13 to its junction with the Tok River, and all drainages into the south bank of the Tok River, from its junction with the Little Tok River to the Tok Glacier, and that area westerly of the of the easternmost bank of the Copper River and drained by all tributaries into the west bank of the Copper River from Miles Glacier north to the confluence with the Slana River drainage north of the south bank of Suslota Creek, **and that portion within the Nabesna River drainage west of the east bank of the Nabesna River upstream from the southern boundary of the Tetlin National Wildlife Refuge.**

Comments:

We support Proposal 90, if improvements are made to the community subsistence hunt. This proposal should be delayed to the March 2017 ABOG meeting.

Proposal 91 – 5 AAC.85.065. Hunting seasons and bag limits for small game. By Lee Adler. Modify the hunting season and bag limits for grouse in Unit 12 as follows:

In Unit 12, a daily bag limit of five grouse per day with a possession limit of ten, except two per day and possession limit of four, for ruffed grouse August 20 – November 10.

Comments:

We support Proposal 91 to a limit of five grouse per day with possession limit of ten, two per day and possession limit of four, for ruffed grouse with a hunting season from August 20 – November 10. During the fall months, too many non-local hunters are over-harvesting grouse and Ruffed Grouse. Ruffed grouse is abounding in population, these upland birds need to be protected from overzealous hunters.

Proposal 125 – 5 AAC 85.045(a)(18). By Alaska Department of Fish & Game. Hunting seasons and bag limits for moose. Authorize the antlerless moose season in Unit 20A as follows:



Resident	Open Season
Nonresident	(Subsistence and
Units and Bag Limits	General Hunts)
Open Season	
Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area	
RESIDENT HUNTERS: 1 bull with spike-fork Antlers or 50-inch Antlers or antlers with 4 or more brow tines on one side; or	Sept. 1-Sept. 25 (General hunt only)
1 antlerless moose by drawing permit only; up to 2,000 permits may Be issued the Remainder of Unit 20(A); a person may not take a cow accompanied by a calf; or	Aug.15-Nov. 15 (General hunt only)
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1-Feb. 28 (General hunt only)
1 bull by drawing permit Only; up to 1,000 permits may be issued in combination with the Remainder of Unit 20(A); or	Sept. 1-Sept. 25 (General hunt only)
1 bull by drawing	Nov. 1-Nov. 30



permit only; by
only) (General hunt
muzzleloader only;
up to 75 permits
may be issued in
combination with
nonresidents in
Unit 20(A); or

1 moose by targeted
announced Season to be
permit only; by shotgun or
bow and arrow only; up
only) by emergency order
to 100 permits may be issued (General hunt

NONRESIDENTS HUNTERS:
Sept 1.-Sept. 25

1 bull with 50-inch
antlers or antlers
with 4 or more brow
tines on one side;
or

1 bull with 50-inch
Nov. 1-Nov. 30

Antlers or antlers
with 4 or more brow
tines on one side,
by drawing permit
only; by muzzleloader
only; up to 75 permits
may be issued in
combination with
residents in
Unit 20(A);

Remainder of Unit 20(A) Sept. 1-Sept. 25

RESIDENT HUNTER
1 bull with spike-fork
Antlers or 50-inch
antlers or antlers
with 3 or more brow
tines on one side; or

1 antlerless moose by
drawing permit only; up
only) Aug. 15-Nov. 15
(General hunt



to 2,000 permits may be issued in combination with Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, And the Yanert Controlled Use Area, and the Yanert Controlled Use Area; a Person may not take a cow accompanied by a calf, or

1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or

Aug. 25-Feb. 28

1 bull by drawing permit Only; up to 1,000 Permits may be issued In combination with Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area, or

Sept. 1-Sept. 25

1 moose by targeted announced permit only; by shotgun or bow and arrow only; up only) to 100 permits may be issued

Season to be by emergency order (General hunt

NONRESIDENT HUNTERS:
Sept. 1-Sept. 25
1 bull with 50-inch Antlers or antlers With 4 or more brow Tines on one side

Comments:



We oppose Proposal 125 to re- Authorize the antlerless moose season in Unit 20A. We do not harvest antlerless cow moose, especially cow moose with calves. Cows with calves may be incidentally harvested by hunters. It is against our cultural practice to hunt and harvest cows with calves. Cows could be carrying young and could be killed by hunters.

Proposal 127 – 5 AAC.85.045. Hunting seasons and bag limits for moose. By Jake Spankle. Change the antler restrictions for moose hunting in Unit 20A as follows:

Unit 20A will return to **any bull**. Should the Department of Fish and Game feel the harvest gets too high, they can adjust the season dates accordingly. If the still want to keep the bull harvest lower, they can put nonresident hunters-who care more about harvesting a trophy animal than filling their freezers anyways-on antler restrictions.

Comments:

We oppose Proposal 127 to change the antler restriction for moose in Unit 20A to an Any Bull moose hunt. This proposed change will create more hunting pressure in Unit 20A. During the community subsistence moose and caribou hunting season, local subsistence hunters were impacted by hunting pressure. Opening up Unit 20A to an Any Bull Moose hunt will further exacerbate moose and caribou hunting season.

Proposal 128 – 5 AAC.85.045. Hunting seasons and bag limits for moose. By Leonard Jewkes. Change the antler restrictions for moose hunting in Unit 20A as follows:

Change the Unit 20A to any bull for residents and 50-inch or three brow tines for nonresidents. Keep the hunt dates of September 1 until the 25 the same. The Department of Fish and Game may in the future change the season dates to maintain a healthy moose population.

Comments:

See comments under Proposal 127.

Proposal 129 – 5 AAC.85.045. Hunting seasons and bag limits for moose. By Jeff Barney. Change the antler restrictions for moose hunting in Unit 20A as follows:

Unit 20A: Change the season to any bull and the Alaska Department of Fish and Game (ADFG) can adjust the length of the season if they feel too many bulls are being harvested. If ADF&G has a concern about the number of bulls being taken – then nonresidents should be put on



antler restrictions of spike/fork/50 inch antlers before the season is shortened for residents. This unit and all game management units in Alaska should be managed for maximum benefit to Alaska residents. No antlerless permits should be issued under any circumstances.

Comments:

See comments under Proposal 127.

Proposal 135 – 5 AAC. 84.270(14). Furbearer trapping. By Mike Turner. Lengthen the trapping season for wolverine in Unit 20C as follows:

Wolverine, west of the Parks Highway in Unit 20C trapping season is open from November 1 to March 31.

Comments:

We support Proposal 135 to lengthen the trapping season for wolverine in Unit 20C to November 1 to March 31. Local trappers will have more opportunity to trap wolverines. Incidental trapping of wolverines occur when trapping for other species, trappers should be allowed to keep wolverines that they trap.

Proposal 138 – 5 AAC 85.020. Hunting season and bag limits for brown bear. By Fairbanks Fish and Game Advisory Committee. Lengthen the hunting season for brown bear in Units 20A and 20B remainder as follows:

Resident Open Season	Nonresident Open Season
Units 20(A) and Remainder of Unit 20(B) – June 30 [MAY 31]	Sept. 1 – June 30 [MAY 31] Sept. 1
1 bear every regulatory year	(General hunt only)

Comments:

We support Proposal 138 to lengthening hunting season for brown bear in Unit 20A and 20B from September 1 to June 30 for Residents and Nonresidents.

This proposal if passed will align bear baiting season April 15 to June 30. Black bear baiting is open until June 30, but brown bear baiting is not open, this would allow hunters to bait brown or black bears.



Proposal 141 – 5 AAC.92.510. Areas closed to hunting; and 92.550. Areas closed to trapping. By Denali National Park and Preserve. Close a portion of Unit 20C to the taking of wolf as follows:

Within Game Management Unit 20C; those portions of UCU 0607 and 0605 west of George Parks Highway and bounded by Denali National Park on three sides, is closed to the taking of wolves by hunting from February 1 to July 31 and by trapping from February 1 to October 31.

Comments:

We oppose Proposal 141 to close “those portions of UCS 0607 and 0605 west of George Parks Highway and bounded by Denali National Park on three sides”, is closed to the taking of wolves by hunting from February 1 to July 31 and by trapping from February 1 to October 31.

We oppose adding additional acreage to the existing closed areas to the hunting and trapping of wolves. Closure of wolf hunting and trapping will not increase wolf population. Wolf will go where food source is, and possibly leave the area. Wolves in these areas may have left the area to follow good food source.

ANILCA states that subsistence is a priority, trappers who shoot or trap wolves do so for their livelihood, they exchange furs for cash. Trappers and hunters should not be penalized because NPS cannot do good management on its’ federal public lands.

There are a lot of wolves within other national park lands, Wrangell St. Elias National Park has wolves that could be transported to Denali National Park. National Park has transported wolves to Yellowstone National Park and wolves have thrived there. This would be a better solution then to close hunting and trapping of wolves to subsistence users.

Proposal 142 - 5 AAC.92.510. Areas closed to hunting; and 92.550. Areas closed to trapping. By Denali Citizens Council and Alaska Wildlife Alliance. Close a portion of Unit 20 near Denali National Park to the taking of wolves as follows:

We are asking the Board of Game (board) to establish a no-wolf-take zone in small portion of Unit 20, Subunits 20A and 20C, adjacent to Denali National Park. The proposed boundaries coincide approximately with the Denali National Park wolf population area, delineated by telemetry locations.

Take of wolves is prohibited on lands (Unit 20), in the area bounded on the west by the east boundary of Denali National Park; extending east to one mile east of, and parallel to, the Anchorage-Fairbanks



Intertie Electrical Power Line; on the south by Carlo Creek; and on the north by a line from the southeast corner of Township 11S, Range 9W (Latitude 63 degrees, 55 minutes North), due east to the George Parks Highway, then south along the Parks Highway to a line running due east from the Highway through the town of Healy, to one mile east of the Intertie Line; inclusive of all lands west of the George Parks Highway commonly referred to as the “Wolf Townships,” and/or “Stampede Trail.”

Comments:

See comments under Proposal 141.

Other Regional Proposals:

Proposal 147 – 5 AAC. 85.045(11) Hunting seasons and bag limits for moose. By Alaska Department of Fish and Game. Re-authorize the antlerless moose hunting seasons in Unit 13 as follows:

Nonresident Units and Bag Limits Open Season	Resident Open Season (Subsistence and General Hunts)
<p>(11) Unit 13 1 moose per regulatory year, only as follows:</p> <p>1 antlerless moose by No Open Season drawing permit only; up to 200 permits may be issued; a person may not take a calf or a cow accompanied by a calf</p>	<p>Oct. 1-Oct. 31 Mar. 1-March 31 (General Hunt only)</p>

Comments:

We oppose Proposal 147. If there are too many cow moose in Unit 13, cow moose will find nutritional sources elsewhere. Based upon Ahtna traditional knowledge, cow moose will move to other areas to feed themselves. Cow moose have always sustained themselves, and will continue to do.



Killing cow moose that has a calf is not the practice of the Ahtna People. Cow moose may have a calf with it and accidentally shooting it will leave the calf an orphan, thereby potentially killing a moose calf and cow moose.

Proposal 153 – 5 AAC.92.015. Brown bear tag fee exemption. By Alaska Department of Fish and Game. Reauthorize resident brown bear tag fee exemptions in the Central/Southwest Region as follows:

5 AAC.92.015 Brown bear tag fee exemption.

- (a) A resident tag is not required for taking a brown bear in the following units:
 - (1) Unit 11;
 - (2) Units 13 and 16(A);

Comments:

We support Proposal 153 to re-authorized resident brown bear tag fee exemptions in the Central/Southwest Region in Unit 11 and Unit 13. Hunters will not have to pay \$25 tag fee to hunt, this will encourage more of them to harvest a brown bear.

There isn't a conservation concern for brown bear in Unit 11 and Unit 13. Harvesting more brown bears will protect calves of moose and caribou in these two game management units.



Submitted By

Susan Aikens

Submitted On

2/3/2017 8:19:16 PM

Affiliation

resident unit 26B / Kavik resident

Prop 105: I want to note that the reduction in the present herd size during hunting Season the past few years is due more to a change in migratory habits and herd construction than die off. In the past few years by July 1st, tens of to hundreds of thousands of 3 herds combine and travel through the Refuge where by July 4-7 they split and over half decide to reside in the Yukon territories. The rest exhibit the signs of change of migration and path location of same. The North Slope and unit 26 B/C in particular have seen major wind pattern changes affecting feed growth for the animals in my opinion, but every 7-10 years the Bou will change migration routes, and ebb and flow into other herds. I disagreed with the upswing from 2 to 5 seeing it as an opportunity for over-hunting but also over-feeding the predator population. THAT being said, as the unit 26B only resident, I agree with the down swing to 2 bulls for the non resident hunters, and would also like to see the resident hunters brought back to 2 or 3 any caribou. Moose are not an option and never should be to me in units 26B or C. Poss highly restricted in A. So a 3 per resident may take the pressure off for food supply residentially. The Herd numbers did not decrease due to predation or die off. They are just reassigning themselves and history teaches us they will most likely be back. The Cow season is a good idea to extend giving the calves more time with Moms.

Prop 107: I agree with this proposal and it is about time! I am THE ONLY resident in the 26B unit and the late start to the Bear season forces all the bears to run from the chaos towards 26B and then the hunters dwindle to almost nothing, but the bears are here in great numbers. This has added late predation of the CAH and could even be additionally and laterally responsible to a degree for the migration changes being sooner than typical. The 15 day delay serves no purpose for health of the animals in this unit, and over hunting by road can and is already death with by the 5 mile corridor rules. Extend that area potentially if need be. (create a new unit Dalton unit.)

prop 109: I am actually against this one which will be an unpopular vote for my area, but to remove the restriction will once again allow the harassment by unsavory pilots/ organizations against the hunters. The danger presented by the vigilante strafing was real and daily. There is no way to decipher intent by a visual on a plane, so we must err on the side of caution. Sheep need to not be strafed and sent running off cliffs or injured, and people hunting other species should not be disturbed. Sheeo hunters are already a hardy breed, so suck it up and continue to restrict the air-stalking. I do believe that sheep surveying CAN be done before the season opens, plan ahead.

prop 111: I believe neck snaring to be unneccruel and indiscriminate. With such a broad scope to the season already, do we really need to add neck snares? Moose, and other unintended species will / may be caught. This method is too open to incorrect application/ installation and leaves a large, disproportionate margin for injury and dislodging of snare leaving injured animals/top predators in its wake in zones with potential human interaction esp. with young adults/children.

Prop 113: I do not feel that the sheep need to be restricted to Rams only and think that if anything no more than 1-2 ewes should be taken but a mix nonetheless.

Prop 115: I absolutely disagree with this one. Absolutely do not agree with the extension of the wolverine season here in unit 26. The Wolverine is an apex predator yes, but is a furbearer in great demand in this state. To lengthen the season this way serves only to allow the hundreds/thousand hunters during that extension time to over hunt this species. Whether or not a comprehensive study of Wolverines has been done, to add such pressure during a time when the femakes especially need to raise kits/ be healthy only will serve to damage the progenetics. Yes this region has perhaps a larger population, but you are opening a door to severe species debilitaion during a time frame when the fur is not prime, most people do not take meat, but progenesis would be acutely damaged. I dont think The State of Alaska needs to extend a season when the only gain for hunters is neither usage of fur or meat, but trophy only. Just say no. Charging and random aggressive behaviour is already covered by DLP. This would be a trophy law, nothing more. No.



To: Alaska Dept. of Fish and Game – Board Support Section
FAX: 907-465-6094
ATTN: Board of Game Comments
From: John Frost – Legislative VP of The Alaskan Bowhunters
Date: January 26, 2017
Reference: Comments for Interior/Northeast Arctic Region
meeting – Fairbanks, AK Feb. 17-25, 2017

The Alaskan Bowhunters Association
Comments to Board of Game
Interior/NE Arctic Region
January 26, 2017

The Alaskan Bowhunters Association is a membership 501 C-3 nonprofit association representing conventional bowhunters. Both resident and non-resident hunters who hunt in Alaska with archery gear are members of our organization. We thank the Board of Game for the opportunity to comment on some of the proposals before you at this meeting.

Proposal #48: To allow use of crossbows in restricted weapons hunts.

The Alaskan Bowhunters Association is **Opposed to the use of crossbows in bowhunting or archery ONLY hunts or areas.** Examples would include but not be limited to Eklutna Lake, Dalton Highway and archery only hunts for Dall sheep in 14C. However, it appears that this request is specifically to allow use of crossbows in weapons restricted areas, which already allow use of shotguns, muzzleloaders and conventional bow hunting gear. An example would be the weapons restricted area near Portage Glacier. This seems reasonable and the ABA is **NOT Opposed** so long as a clear distinction is made between weapons restricted areas that already allow use of some firearms and archery Only areas. Our experience has been that very few hunters choose to use crossbows in areas where firearms are also legal, while many bowhunters may choose to use conventional archery gear even in open firearm seasons.



(Alaskan Bowhunters page 2)

Our comments regarding this proposal are exactly the same as for Proposal #20 at your Bethel meeting. We note that you chose to Fail that proposal.

Proposal #66: To establish a conventional archery season for dall sheep in the Interior/Northeast Arctic Interior Region August 1-9 in all sheep areas currently open for general harvest ticket hunts.

The ABA **Supports** this Proposal. Nearly all states in the lower 48 allow generous early archery season as a means of providing plenty of hunting opportunity to a large number of individuals with relatively minimal harvest. At a time when there is general dissatisfaction with dall sheep hunting opportunities and complaints of too much crowding this proposal would provide increased opportunity to hunt sheep with reduced harvest of the resource. There is data from over twenty five years experience with the archery harvest of dall sheep in unit 14C that shows very low harvest even when "any sheep" is legal. This proposal does not request "any sheep" or even "any ram" but asks only for the chance to harvest an otherwise mature legal ram during a season free from firearms competition. To the extent that many, if not most bowhunters would choose to hunt in this early season it would reduce crowding on the 10th of August when the normal general season opens. Please notice that this proposal is not allocative between resident and non-resident hunters and would give guided nonresident bowhunters an opportunity to hunt and would give guides an additional hunt to book. This would increase revenue to the State of Alaska and to the guiding industry.

Proposal #69: Lengthen current archery only moose seasons in unit 20 and/or create a unit 20 late archery season.

The ABA **Supports** this proposal. It provides extra hunting opportunity with expected minimal additional harvest. The reason for requesting a moose hunt after the regular firearms general season is for better meat care with colder weather. Also an early moose hunt before the firearms season would be more difficult because the moose are not moving and vegetation makes them more difficult to find.



(Alaskan Bowhunters Page 3)

Proposal # 71: To allow hunters over age 60 to use a crossbow to hunt in archery only areas.

The ABA **OPPOSES** this proposal. There are already regulations that allow a truly disabled hunter to use a crossbow in archery seasons. There is no reason to allow strong healthy older individuals use of a crossbow simply because of their age. Many archers in their 70s can still shoot a 50 pound draw conventional bow, which is the minimum legal for harvesting moose. We view this proposal as one more step to have crossbows considered "archery gear". This type of thing has occurred in many states in the lower 48 and it has not been a good thing. Recent experience, in Michigan and Wisconsin, has shown that introduction of crossbows in the archery seasons has significantly increased game harvests and begun to interfere with firearms harvest. Inclusion of crossbows in archery season has not resulted in increased license sales. The purpose of special archery seasons is a management tool to allow increased hunter participation and opportunity but with relatively minimal harvest.

Proposal #105: In 26B to close caribou season for cows until August 1 and to reduce the Non-resident limit to two caribou.

The ABA **SUPPORTS** this proposal. The DHCMA, which is bowhunting only, is very important to us. We believe that declining caribou herds elsewhere in the state will result in increased numbers of hunters for this caribou herd. With potential for decline in this herd we see no reason to allow non-residents to harvest five caribou. Also harvest of cows with young calves in July does not make good sense.

Proposal #106: Open a resident archery season for Grizzly Bear in the DHCMA starting August 10th.

The ABA **SUPPORTS** this proposal. There are increased numbers of grizzly bear and decreasing numbers of moose and caribou. This could be either an earlier separate registration hunt or could simply be a lengthening of the season for the current resident fall registration hunt (RB988). Again increased opportunity for bear hunting but probably small impact on total number of bear actually harvested.



(Alaskan Bowhunters Page 4)

Proposal #107: Lengthen the grizzly bear season in unit 26B and change the current non-resident drawing hunt to a registration hunt. The ABA **SUPPORTS** this proposal as it does essentially the same thing and for the same reasons as proposal #106. Either one of these proposals would affect the DHCMA.

Respectfully Submitted,
John Frost – 907-360-1301

A handwritten signature in cursive script that reads "John D. Frost".

Legislative Vice President of the Alaskan Bowhunters Association.
PO Box 220047
Anchorage, Alaska 99522-0047
907-929-3600



Submitted By
Rod Arno
Submitted On
2/3/2017 3:34:39 PM
Affiliation
Alaska Outdoor Council

Phone
841-6849
Email
Rodarno@gmail.com
Address
310 K Street, Suite 200
Anchorage, Alaska 99501

Proposal 113 - Adopt. (Meaning that would be the preferred action by the board)

If for no other reason than to honor the North American Model for Wildlife Conservation. After a range wide decline in the Dall sheep populations after 2013 every ewe left alive was critical to the recovery of the herds across the Brooks Range. Lamb observations are increasing in the Central and Eastern Brooks. More breeding ewes means the quicker the recovery of the population. The department's comments that there are so few ewes harvested to matter is inconsistent with conservation practices. AK State Constitution Article VIII, Section 4, Sustained-Yield. And as far as the department's point that since "local residents would still be hunting ewes on federal lands" the state regulation wouldn't make any difference in the number of ewes harvested is a sad commentary. The state successfully lead with conservation measures for the Western Brooks Range sheep populations in GMU 26, the Feds followed. The state is still expected to manage public game resources even if the federal land managers are following policy saying they do. Every breeding ewe will help speed the populations recovery to recorded numbers.

Proposal 47 - Oppose adoption.

AOC does not consider the current state definition of edible meat 5 AAC 92.990(26) for game birds leads to wanton waste.

Proposal 49 - Support adoption.

The legislatures intent to allow resident Alaskans to accompany nonresident relatives hunters on hunts for guide required species of big game, AS 16.05.407(a)(2). There is no biological reason for the board to infringe on resident Alaskan hunters opportunity to participate in regulated hunts while accompanying a relative nonresident licensed hunter.

Proposal 55 - Amend and adopt.

Amend 5 AAC 92.010 to require resident moose hunters to signify whether they are hunting under subsistence or general hunt regulations on all moose populations in Region III with C&T findings, 5 AAC 99.025. Due to the state's financial constraints ADF&G is unable to accurately determine the ANS for any moose populations in Region III that has a C&T finding.
5 AAC 99.025(b) without knowing the subsistence use.

Proposal 80 - Adopt.

The board adopted boat horsepower restriction as an allocation measure to discourage down river residents from harvesting moose in GMU19A. Restricting one user groups access is inconsistent with the Common Use clause, AK State Constitution Article VIII, Section 3. Permitting moose hunters for biological concerns to prevent over harvest is more consistent with state statutes than restricting one user group.

Proposal 83 - Adopt.

When harvestable surplus is under utilized AOC supports increasing hunter opportunity.

Proposal 89 - Adopt.

As active game management has increased the harvestable surplus of moose in the Copper Basin AOC supports increasing harvest opportunity for all Alaskans. This proposal is timely in that it's a relatively restricted area to gather data on how best to come out of a highly restrictive antler configuration for harvest to one more liberal. Some feel the spike/fork, 50" plus, 4 or more brow tines regulation skewed the genetic makeup of the moose population. GMU12 has a long record already established regarding antler restricted moose seasons. Allowing for a less restrictive antler configurations to increase harvest on young bulls in a stable moose population would increase hunter opportunity. Plus the department would be able to collect more data on the biological affects of regulated trophy hunting on a population.

Proposal 90 - Do not adopt.

Repeal 5 AAC 92.074(d) it has not served anyone's purpose. The Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti Kaah Community subsistence harvest adopted by the board in 2009 gave Ahtna people unachievable expectations. Based on the boards findings, #2006-170-BOG and #2011-184-BOG it was not unreasonable for Ahtna people to assume they were the sole recipients of caribou and moose permits for their CSH. The community process that has evolved in 5 AAC 92.074(d) is clearly not what the legislature had in mind when they adopted the language in AS 16.05.330(c).

Proposal 93 - Do not adopt.

No amount of capitulating to federal land managers is going to help. The State of Alaska gives up old motorized trail access far to easily. Just put up a sign warning hunters.



Proposal 101. Do not adopt.

AOC policy 2-83 does not support any preference to publicly owned moose based on residency, culture or ethnic background.

Proposal 103. Adopt.

It's time to manage both herds separately and gather accurate harvest data from both herds.

Proposal 117. Adopt.

AOC is supportive of brown bear baiting as a regulatory tool used in activity managing game.

Proposal 142. Do not adopt.

AOC is not supportive of reallocating game on state lands currently open to hunting/trapping to just viewing.



Submitted By
Thor Stacey
Submitted On
2/3/2017 3:34:45 PM
Affiliation
Alaska Professional Hunters Association

Phone
9077231494
Email
thorstacey@gmail.com
Address
PO Box 240971
Anchorage, Alaska 99524

February 3rd, 2017

Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during your February meeting in Fairbanks. The Alaska Professional Hunters Association Inc. (APHA) is opposed to attempts to change non-resident allocation formulas established in Board Policy (2007-173-BOG). APHA members rely on fair and predictable allocation to non-resident hunters based on defensible biological parameters that are in line with the principles of sustained yield and result in a maximum benefit to ALL users. The APHA maintains its support of the Board's current allocation policies and believes that the well-defined, species specific, resident preferences are in the best interests of all Alaskans.

Individual Proposal Comments

Below you will find our comments on individual proposals under your consideration for Region III. Leading up to the drafting of these comments the APHA held multiple teleconferences and invited all of its members to participate in the drafting of these comments. Our teleconferences were well attended with good representation from guides who conduct hunts in Region III. You will find that there are some proposals that we don't have comments listed for. These were proposals that we felt did not directly impact guides or were outside of the group's purview. We also chose, in a couple of instances, to group similar proposals together and combine our recommendations. While these comments represent the voice of our group, you will undoubtedly get comments from APHA members who want their individual positions considered as well. Because the APHA takes a statewide perspective when approaching Board proposals, we urge you to consider regional expertise from our members even when their position is different from that of the APHA. Finally, we thank you for your consideration and urge you to reach out to our membership for clarity and details on proposals before you, either on a unit-by-unit or regional basis. Given the opportunity, Alaska's hunting guides will continue to bring a wealth of wildlife and hunting knowledge to the table.

Proposal 49 & 50 - Support

After working with the Department, APHA **supports Prop. 49 and Prop. 50 as a statewide action.** APHA wrote the proposal that resulted in the bag limit restriction on second degree of kindred relatives (2DK) but that proposal was significantly different than the board-amended version that actually passed. APHA would like to see the slate wiped clean so that any future regulations to address problems or abuses with 2DK use or allocation are fair and solve the actual problem identified.

Proposal 51- Oppose



Proposal #51 would illegally remove ALL non-residents from the field when there is an Intensive Management **PLAN (not program)** in place for a prey species in Region III

Proposal #51 would contravene legislative intent and should be summarily rejected.

AS 16.05.255 is clear that residents have a statutory allocation priority (AS16.05.255(d)) but that intensive management (IM) should

"...restore the abundance or productivity of identified big game prey populations as necessary to achieve human consumptive use goals of the board" (AS16.05.255(e))

Nothing in AS 16.05.255 suggests that the *"human consumptive goals of the board"* may not include a non-resident allocation. Aside from the long-term human consumptive goals alluded to in AS16.05.255, the legislature had the opportunity to clarify in plain statutory language if its intent was to close non-resident participation during an IM program. Nowhere in Alaska statute does the legislature give any such direction. Non-resident participation and an active IM program are not mutually exclusive.

Proposal 51 should fail because it misconstrues the plain statutory language in AS 16.05.255 by suggesting there is a need to enshrine another layer of resident hunter preference in times of resource shortage. The legislature and the Board of Game have done a good job describing their goals and implementing IM programs, while giving preference to Alaskan residents. The Board of Game does not need an additional layer of regulation to convey clear preference to Alaska residents in times of resource shortage. APHA supports the legislature's intent outlined in AS16.05.255 that provides for IM and a strict resident preference for moose, caribou, deer and elk.

Intensive Management Population Thresholds Change:

An important aspect of how the IM population objectives are set is that they are flexible and can be changed depending on a variety of criteria. Certain areas in the state initiate IM when populations are not severely depleted but are more at a midpoint in their cycle. These areas often times have non-resident opportunity allocated even when IM is being considered. Non-residents should not be excluded from allocation schemes where the population thresholds for IM are well above population low points. Proposal 51 could have the unfortunate and unintended effect of lowering population thresholds for considering IM in GMUs and Regions that have done the work to make IM a more proactive rather than a reactive management tool.

Non-Residents Harvest Predators While Hunting for Ungulates:

Guided non-residents harvest predators in remote areas of the state while hunting for "prey species." Often times these harvest patterns can show a "net gain", where the effects of secondary predator harvest not only compensate for ungulate harvest but exceed it in future prey survival. Guided non-resident hunters can be another tool in ADFG's toolbox, especially in remote areas, where additional harvest of predators is desired. Passing a blanket exclusion on non-resident participation when IM plans are in place will take a tool out of ADFG's tool box at a time when we are trying to give ADFG more options, not less.

Proposal 52- Oppose



APHA strongly opposes Prop. 52 due to its lack of a conservation basis for the requested allocation restrictions. Prop. 52 further fails to discuss important issues surrounding the Board of Game's statutory mandates which it must consider when making preferences between beneficial users. Non-resident hunting licenses and tags are the main source of revenue for the Department of Wildlife. Proposal 52, as written, would cause an undue cost to the public and the department, by depriving ALL Alaskans of necessary funds to manage wildlife for their use and enjoyment. Alaska is in the middle of a difficult time economically. Prop. 52 would diminish necessary conservation funding to state coffers while gravely disadvantaging small hunting guide businesses. Passage of Prop. 52 would result in less public and private sector jobs.

Proposals 57-61- OPPOSE

APHA maintains strong opposition to efforts to re-allocate sheep hunting opportunity without a clear conservation objective. There are 6 such proposals that will be addressed in the Region IV Fairbanks Board of Game meeting.

Updated Sheep Management Plan

ADFG is currently drafting an updated sheep management plan. The need for a current sheep management plan became abundantly clear during the Sheep Working Group (SWG). APHA's comments regarding the SWG and sheep conservation issues for the 2016 statewide meeting were as follows:

"APHA is thankful to the Department, the Board and the other Stakeholders who, in good faith, supported the concept of a "Sheep Working Group" (SWG). To say this has become a challenging process is an understatement. To assert that the SWG is a waste of money or time is more a reflection on the individual or group making the assertion than on the resource in question or the value of gathering knowledgeable persons from across the state in one room to work on sheep conservation. A consensus driven process relies on gathering a group of individuals with a willingness to compromise, and who have good will towards each other with some basic social skills and open minds that consider other's interests as well as one's own selfish goals. APHA entered into this group with the intention of considering an request and idea. Unfortunately, a super small minority of the SWG stated their goals to see the group fail. This conflict does nothing at all to help conserve or manage sheep. APHA maintains its position that conservation measures are appropriate at this time, where re-allocation, or fighting over who gets to kill the last ram, is absolutely at odds with a bright future. APHA suggests that if money is to be spent on future SWG meetings, the board should reconvene the steering committee to select the future participants rather than allow stakeholder groups to "self-select" their representative."

We recommend that you fail every sheep proposal pending the release of the Department's updated "Sheep Management Plan." APHA feels strongly that significant changes to sheep hunting opportunity should have a conservation basis.

Proposal 62- OPPOSE

APHA strongly opposes efforts to allocate hunter success vs. hunter opportunity. APHA is a professional organization of hunting guides who are subject to our organization's code of conduct as well as professional ethical standards. As per 12 AAC 75.340 (f)(1) a guide is prohibited from:

"make(ing) guarantees as to the success of a hunt or the number of animals to be taken on a hunt;"



Violators of 12 AAC.340 are subject to sanctions described in AS 08.54.710. Proposal 62 would allocate hunter success and then create an ethical conflict for guides where one does not exist now. It is unethical for guides to make guarantees of success to clients, or potential clients. Prop. 62 would reward guides with more non-resident opportunity for lowering success rates.

Proposal 62, and other efforts to allocate hunter success, work counter to established principles of consumer protection and professional ethics. You cannot regulate success, so allocation, when necessary, should be based on opportunity. Proposal 62 should be rejected.

Proposal 63- AMMEND

APHA recommends addressing proposals like Prop 63 on a statewide basis.

Proposal 65- OPPOSE

Limiting non-residents to one ram every four years is an appropriate conservation and allocation measure in these times of depressed sheep populations. There is little disagreement that each and every legal ram is precious and valuable. It makes sense to mirror brown bear non-resident harvest restrictions during times of challenged sheep resources. Small, incremental conservation measures may add up to large savings for future Alaskan hunters.

Proposal 67- Support

APHA supports Prop. 67 on its given merits.

Proposal 69- Oppose

Proposal 75- Support

Proposal 79- Support

APHA supports this proposal based on the obvious conservation merits of intensive management in the McGrath area. We defer to, and support, the department's comments on this proposal.

Proposal 81- Support

APHA supports this proposal based on the stated need to clarify 5 AAC 92.540(7)(a)(ii) and we agree with the reasoning in this proposal. Proposal 81 is a necessary clarification that will ease enforcement and reduce the potential for conflicts.



Proposal 82- Oppose

APHA opposes this proposal but agrees with the proponent that a guide concession program would benefit sheep hunters in unit 19.

In 2015 APHA realized that the guide industry needed to put its advocacy for a guide concession program on hold and focus its efforts on new revenue for the Division of Wildlife. Now that HB137 has passed and there are millions of dollars in new revenue available for wildlife conservation, APHA will fully commit its resources to support the guide concession program.

APHA opposes Prop. 82 because there is not a defined conservation goal, and drawing hunts, without guide concessions, destroy guide business viability.

Proposal 83- Defer to Central-Southwest Region Meeting

APHA agrees with the Department that Prop. 83 should be deferred to the Central-Southwest Region Board meeting in spring, 2018.

Proposal 87- Support

APHA supports this proposal because it fixes an unintended effect of the new youth sheep hunt. The Glacier Mountain Controlled Use Area should be in effect for both youth and adult sheep hunters.

Proposal 92- Support

APHA supports Prop. 92 based on its given merits.

Proposal 97- OPPOSE

Back Ground:

In 2008 the Board of Game passed Proposal 55 creating DM810 in an extremely remote portion of GMU 21B that includes portions of the Nowitna National Wildlife Refuge. DM810 was deemed necessary to address conservation concerns but the board was challenged by practical concerns of how tags would be utilized in such a remote and economically depressed region. The board applied its own allocation policy, based on average historical use, and allocated 50% of the tags to residents and 50% to non-residents. To ensure the maximum participation and benefit of the limited number of allocated tags, non-resident tags were further broken down into two categories; guided non-resident and non-guided non-resident. No less than 25% of the non-resident tags would be unguided, no more than 75% would be guided. The board applied its own policy for resident/non-resident allocation when going to a draw hunt and created a



Legal Concerns

The proponent of Prop 97 complains that DM 810 is an illegal hunt structure that is unconstitutional and in violation of statutory authority not explicitly granted the Board of Game. The authors argue that resident hunters are enshrined with a constitutional allocation priority (Article 8) and that the board of game has somehow illegally broadened AS 16.04.407 by allocating some non-resident drawing tags to “guided non-residents.” The authors of Prop 97 disagree with the Board of Game and the Department of Law and assert DM810 illegally provides for a “guided non-resident” moose allocation.

DM810- A Constitutionally Sound and Statutorily Defensible Hunt Structure-

Article VIII of Alaska constitution addresses “natural resources” with the following sections being germane to the discussion on Prop. 97:

Section 1: Statement of Policy

It is the policy of the State to encourage the settlement of its land and the development of its resources by making them available for the maximum use consistent with the public interest.

Section 2: General Authority

The legislature shall provide for the utilization, development and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people.

Section 4: Sustained Yield

Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.

The Framers of Alaska’s constitution had the opportunity to enshrine a “clear resident hunter priority” in the constitution; they did not do so. The Framers did make it clear that they wanted Alaska’s resources developed for “...*the maximum benefit of its people.*” Article VIII, section 4, empowers the legislature as the body that will make game allocations or “*preference(s) among beneficial uses.*” Recognizing the strength of a decentralized power structure, the legislature delegated most of its wildlife allocation authority when it constituted the joint boards of fish and game. Proponents of Prop 97 falsely assert the existence of a “clear resident hunting priority” in Alaska’s constitution; the board of game has broad authority to make allocations for “*the maximum benefit of its people(s).*”

Geographic, Economic and Social Concerns

GMU 21B is an extremely remote and sparsely populated region of Alaska. Most of 21B is Federal land that is closed to mineral entry and timber harvest. Federal land management policy further disadvantages Alaskans where building of new cabins or structures is, for all practical purposes, impossible. Fish, wildlife and fur animals are the primary resources local residents rely on for food security and a limited cash economy. Guiding hunters may be the most important economic opportunity in the area and other rural areas similar to GMU



21B (McDowell, 2013). Economic opportunities provided by game allocations to hunting guides sustains critical employment; meat sharing (McDowell, 2017); and transportation and logistical support to locals for remote traplines, fish counting stations (ADF&G), subsistence fish wheels and subsistence farming. The portion of GMU 21B that includes DM810 realizes all of these social and economic benefits of the guide industry.

Traplines, Wolves and Resident Hunting Opportunity

Much of GMU 21B is federal land managed by USFWS and therefore off limits to state intensive management. Predator harvest that offsets human harvest of ungulates is almost solely attributed to the region's trappers. Some wolf and bear harvest does occur annually from subsistence users, resident hunters and non-residents hunting with the local guide. DM810's region includes a number of active traplines that benefit from having a local hunting guide help with transportation of goods and necessary supplies, the number one expense for the local trappers. The sustained wolf harvest from these local traplines, a known benefit to resource management, is therefore an indirect benefit of guided non-resident hunters. Guided non-resident moose hunting opportunity is a critical link in the chain that bonds Alaskan hunters to a healthy and wild Nowitna River.

Resident hunters and the harvestable surplus of moose they rely on for their allocation are currently benefitting from local trapping and guided non-resident bear and wolf harvest. Passage of Prop 97 would destabilize the relationships between necessary logistic support of local trapping, guided predator harvest, and the moose resource. Trapping and guiding hunters are currently working to *"encourage the settlement of its (Alaska's) land and the development of its resources by making them available for the maximum use."* Total or gross numbers of resident hunters should not be the sole consideration while seeking *"the maximum benefit of its people(s)."*

Guides are Alaska Residents

Alaska's active registered guides are overwhelmingly Alaskan residents. According to the 2012 McDowell study, 89% of the active contracting guides in Alaska are residents. That means virtually all of the new dollars and other associated economic benefits (employment, spending etc.) from guiding hunters in Alaska stays in Alaska. Alaska's near total capture of the benefits brought by guided hunting is magnified in rural areas. Fully 50% of the economic benefits of guiding hunters stay in rural Alaska (McDowell, 2012). It is easy to argue against "non-resident hunters" but we should be arguing FOR resident Alaskan hunting guides who bring a necessary economy to depressed rural areas. The current hunt structure in DM 810 is a manifestation of the legislature's constitutional command to: *"provide for the utilization, development and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people."*

A strong case can be made that the residency of the guide should determine whether or not the allocation is "resident" or "non-resident."

Mixed Cash Subsistence Economy- Shared Meat

In 2015 hunting guides and their non-resident clients shared 230,000 lbs. of game meat in Alaska (McDowell, 2017). Meat shared by guides was conservatively valued at a 1.1 million dollars replacement (beef) cost. Sharing meat is particularly important in the aforementioned economically depressed areas in rural Alaska.

GMU 21B is entirely rural with 100% of its residents qualifying both as State and Federal subsistence users. Moose are the most important terrestrial source of protein to the area's residents. DM 810 encompasses an exclusive federal guide concession. This concessionaire is a local resident, who hires other experienced local residents as assistant guides. Guiding hunters does not disqualify a person from qualifying for state or federal subsistence hunting opportunities. Shared guided non-resident moose meat directly replaces moose that would have to be allocated and harvested under state or federal subsistence seasons if there was a loss of guided-moose hunting allocation. Guided non-resident moose harvest is critical to the mixed cash, subsistence economy in 21B.

Conclusion



DM 810 is a statutorily defensible and constitutionally sound hunt structure. DM810 is evidence that the Board of Game works to evaluate the complex social and economic relationships that surround wildlife use in rural Alaska. DM 810 provides excellent opportunity to hunt an extremely remote moose population in a way that allows locals to work for the greatest interests of all Alaskans. Clearly resident hunters support sound wildlife management, to include sustainable predator harvest. Local trappers catch wolves in the unit and they are partly reliant of the benefits brought by the local guide. Locals employed as guides do not need to hunt under subsistence seasons to fill their freezers with valuable moose meat. Urban resident hunters can now travel to a remote and wild region that has a more abundant moose population than it would have without the benefits brought by guided moose hunters. Resident hunters enjoy other benefits to the current situation as well. Having a local guide and local residents living in the region provides a safety net in these times of reduced public safety budgets. Guides don't just share meat, employ people and bring new money to Alaska, they also help resident hunters in need and act as stewards of the country.

Passage of Prop 97 would unnecessarily upset and impoverish a remote portion of Alaska that is currently self sufficient. Only a very few urban resident hunters would benefit until the moose population declines and the number of tags available diminishes. Transporters would also benefit from removing the "guided non-resident moose hunter" requirement. Unit 21B is remote, and its residents rely on subsistence use of fish and game. Non-guided non-residents are much more likely to waste meat, and less likely to share with locals, than are guided non-residents. Proposal 97 should fail because of the many enumerated and defensible benefits for all Alaskans (Alaskan resident hunters, Alaskan guides, Alaskan residents of the area and Alaskans that can no longer hunt) under the current regulations; whereas the proposed solution only benefits non-residents who don't want to hire a guide, transporters and urban resident hunters who must draw.

Recommendation-

APHA suggests that some non-resident moose, deer, caribou and elk drawing hunts that do not have a "guided non-resident" allocation are working counter to statutory and constitutional mandates to derive the "maximum benefit" of Alaskan's precious game resource to "its people."

APHA recommends the Board of Game request a full staff analysis (Division of Wildlife, Division of Subsistence, Department of Commerce and Federal Office of Subsistence Management) of the social, economic and conservation issues relevant to all the drawing hunt structures requiring a "guided non-resident moose" allocation. Given the new information contained in APHA and SCI's 2017 McDowell report, DM810 is a template that could be applied in all non-resident drawing moose hunts in Alaska.

Proposal 98- Support

APHA supports proposal 98 based on its given merits.

Proposal 99- Amend and Adopt

APHA recommends Prop 99 be amended to a July 25th season start date, and retain the existing end dates.

Proposal 105- Support

APHA supports Prop 105 based on its stated conservation goals. We understand that the Central Arctic Caribou Herd has declined close to minimum management objectives. It makes sense to lower caribou harvest at this time. Prop 105 proposes a fair restriction with reasonable allocations between resident and non-resident hunters.



Proposal 107- Support

APHA disagrees with the department; Prop 107 will not cause a bear conservation concern in GMU 26B. Managing non-resident bear hunts by registration hunt allows for an appropriate balance between increased opportunity and conservative harvest.

The proponent of Prop 107 states that he has hunted in the area for 37 years. We are confident that he will suggest more restrictive harvest seasons, numbers or hunt structures if the bear population diminishes to a point of concern.

Proposal 109- Support

APHA strongly supports Prop 109 based on its given merits.

Proposal 110, 111- Support

APHA appreciates the Yukon Flats Fish and Game Advisory Committee's goal of increasing black bear and wolf hunting opportunity based on the super abundance of black bears in the area. Black bears are an excellent animal to hunt for food and black bear hunting is a great way to get out in the field and enjoy the outdoors. We understand the locals have been snaring bears going back many, many generations and support legalizing a practice that is customary and traditional.

Proposal 113- Support

APHA supports Prop 113 based on its stated conservation goals. Sheep in region IV are at historic low numbers. Harvest of ewes at this time is inappropriate. .

Proposal 117-121 Support

Proposal 124- Support

APHA agrees with the proponent that Prop 124 would ensure that hunt allocations set aside for wounded veterans are fully utilized.

Proposals 127, 128 and 129- Oppose

APHA agrees with the Fairbanks AC's comments in opposition of these three proposals.



Proposal 132- Support

APHA supports increasing non-resident moose seasons in GMU 20B because. Prop 132 offers a modest lengthening of the season that is unlikely to cause a conservation concern.

Proposal 136- Support

Re-evaluating intensive management goals periodically is a good idea. If the Delta caribou herd is not attaining its population objective, evaluation and assessment of the management parameters is justified.

Proposal 140- Support

APHA supports Prop 140 based on its given merits.

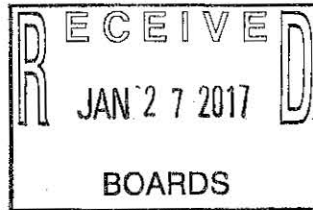
Proposal 142- OPPOSE Buffer Zones

APHA opposes efforts to re-create a Denali wolf buffer zone. Such efforts are divisive and not biologically justified. Wolf viewing opportunities are much greater on the adjacent state managed land. It does not make sense to apply Park Service management, that has resulted in a small wolf population and minimal viewing opportunity, to an area where wolves are better managed and more abundant.



Alaska Trappers Association
PO Box 82177
Fairbanks, AK 99708

ADF&G
Boards Support Section
PO Box 115526
Juneau, AK, 99811-5526
ATTN: BOG COMMENTS



January 23, 2017

Dear Chairman & Members of the Board:

The ATA appreciates the opportunity to offer the following comments on proposals you will be considering at your February 2017 Interior/Northeast Arctic meeting in Fairbanks.

Proposal 72 - We support this proposal within the parameters of existing predator control regulations.

Proposal 73 - We have no problem with another user group harvesting coyotes but, with all due respect to the Delta Junction Fish and Game Advisory Committee, we suggest that any coyote hunting with dogs not overlap the trapping season. We suspect that access limitations would make dog recovery problematic in most of Unit 20 but, more importantly, we are fearful of the conflict between loose dogs and traps.

Proposal 84 - With all due respect to the Upper Tanana Fortymile Fish and Game Advisory Committee, we oppose the extension of wolf trapping season for the purpose of aligning with the federal subsistence season. Since fish and game management is the responsibility of the state, it would make more sense that the federal season be modified to comply with the state season. Also, incidental catch would present a problem.

Proposal 98 - We have been told that this is being handled administratively, and trust the Board, and ADF&G staff, to take the appropriate action.

Proposal 99 - We oppose the extension of wolf hunting season into the summer. We suspect that the survival rate of pups would be significantly reduced if they lost either of their parents during the summer and it would be pretty easy to wipe out an entire family unit under the right conditions. Also, the pelts would be far from prime. This proposal also appears to benefit non-resident hunters at the expense of residents.

Proposal 112 - We support the proposal within the parameters of existing predator control regulations.



Proposal 114 - We oppose the extension of wolverine hunting season into summer. We suspect the survival rate for young that lose their mother this early would be low. Also, this proposal appears to benefit non-resident hunters at the possible expense of residents. We contend that the hunting seasons for furbearers should closely reflect the calendar limits of trapping regulations.

Proposal 115 - We oppose the proposal as written but support the alternate solution of ending the lynx trapping season on March 15 in order to standardize the lynx season for all of Unit 25.

Proposal 135 - We have no objection to the proposal as it would standardize the wolverine trapping season in the remote western portion of Unit 20C with the wolverine trapping season in adjacent Unit 19.

Proposal 141 - We oppose this proposal. It appears to be an incremental step toward the buffer that has been proposed before around the east end of the expanded, six million acre Denali National Park.

Proposal 142 - As we have done consistently in the past, we oppose this proposal. It is an over reach of the "no more" intent of ANILCA. Alaskans lost a lot of hunting and trapping opportunity to ANILCA. Closing these areas of state management to hunting and trapping, and/or shortening seasons, is biologically unnecessary since wolf populations are dynamic and healthy, and because the current harvest is minimal.

The Park already encompasses six million acres that is closed to hunting and trapping. Wolves come out of the Park because the resources in the Park don't support them. Management within the Park should be adjusted to remedy that before any attempt is made to spread park management beyond the boundaries of the Park.

We object to this consistent effort by people opposed to consumptive use of wildlife to force their version of "compromise" onto consumptive users. If they seek real compromise, then they must offer something of value in return. If the State is somehow forced to resurrect the Denali wolf buffer zone, then we recommend the State demand that all residents be allowed to hunt Dall sheep in Gates of the Arctic and Wrangell-St Elias parks.

Thank you for this opportunity to comment on these proposed regulations.

Sincerely,

A handwritten signature in black ink that reads "Randall L Zarnke".

Randall L Zarnke, president



BACKCOUNTRY HUNTERS AND ANGLERS ALASKA CHAPTER

www.backcountryhunters.org/alaska_bha



December 15, 2016

Comments to the Alaska Board of Game Arctic/Western Region January 2017

Proposal 4 and Proposal 100: Oppose PROPOSAL 4 – 5 AAC 92.085 and PROPOSAL 100 – 5 AAC 92.085, which institute no-fly zones for caribou hunting in Units 21D, 22, 23, 24, and 26A.

These proposals restrict aircraft to ONLY Friday, Saturday, Sunday and Monday for the purpose of giving local hunters three days without aircraft noises. Weather delays with flying are commonplace in fall periods in this region, and these proposals severely limit non-local hunters and air operators when weather delays overlap “no-fly” days.

This could easily result in non-local hunters either being stranded in Kotzebue and wasting valuable hunting days or being left afield on the flip side potentially wasting meat. The former scenario will increase user conflict by forcing non-locals to wait out weather and “no-fly” days in a community where they do not feel welcome; the latter scenario places hunters and game meat in a compromising situation with meat care efficacy.

Let’s say a non-local hunter happens to hit a good weather period on the “fly-days” and accomplishes a 10 day hunt, and now that hunter has 120-lbs of caribou meat being preserved in the field. Exit strategies must be as timely as weather allows. If that hunter is struggling to preserve edible meat in the field by his last day and is forced to wait another two or three days for the next “fly-day” period, this could easily result in violations of failure to preserve edible meat. The risk of this scenario should be enough to take no action on Proposal 4 and Proposal 100.

Motorboats and airplanes are traditionally accepted modes of transportation in Alaska, and noise disruptions are a technological factor that should not be controlled by regulation. If you limit one mode of transportation, you must consider limiting other modes with equal or greater noise disturbance factors. In this case motorboat traffic is more disruptive than aircraft noise, because motorboats travel slower and direct on-the-ground hunting pressure accompanies this disruption, whereas aircraft noise last only a couple of minutes and does not accompany on-the-ground disturbances or increased hunting pressure in the immediate area.

It has been stated time and again from local native communities that aircraft and non-local hunter traffic are the cause of the herd decline and migration disruption which affects subsistence harvest, yet not one shred of scientific data or field observation supports this personal opinion. Alaska must not allow local opinion, without scientific support, to shape our hunting regulations. This proposal is a poor attempt to limit non-local hunter activity in this region, and its consequences are too great a risk for hunters’ limited field time and meat care exit strategies.

Proposal 44: Oppose PROPOSAL 44 – 5 AAC 92.540(9)(A) Control use area, which modifies the Noatak Controlled Use Area in GMU 23.

The Noatak River Controlled Use Area currently covers the lower 175 miles of the Noatak River from the ocean upstream to Sapun Creek, and this proposal extends that CUA by another 70 miles upstream to the Cutler River. The stated reason for this proposal is an undocumented increase in user conflict between local and non-local hunters at the head of the current CUA boundary, which claim to be reducing caribou harvest success in the fall. What will happen when local hunters still do not feel this CUA extension is enough to satisfy their needs? Further extensions of the CUA and more restrictions for non-local hunters and aircraft usage on this federal public land is the likely result, without any increase in subsistence harvest success during August and September.



The current CUA boundaries along the Noatak should be considered adequate unless increased opportunity is reasonably expected from this extension, and it will not be expected because caribou whereabouts and access to these animals decide harvest success (not airplane noise and non-local hunters). The only outcome of this proposal is to further restrict aircraft usage and non-local hunter traffic, but will not increase subsistence harvest success because water levels often prevent motorboat traffic from exploring the northern tributaries of the Noatak River upstream of Sapun Creek.

There have been zero documented reports from non-local hunters that support a user conflict dilemma between them and local hunters in the northern portions of this boundary, which causes some speculation that anecdotal accounts are grossly exaggerated and should not be allowed to influence public land access without due process of facts and data to support claims of such issues. The only way a user conflict is occurring in this area is when local hunters decide to travel and hunt upstream of the current 175-mile long CUA boundary at Sapun Creek. In that case, locals must accept public land usage and share hunting opportunities with their fellow Americans when their paths cross on state and federal public lands above the current CUA boundary. Furthermore, the 70 miles between Sapun Creek and the Cutler River is a corridor used for aircraft take-out transportation by non-local hunters and is not considered a productive hunting corridor during August and September, so "hunting success" is not being disrupted because no harvests generally occur in the proposed extension area. This proposal clearly benefits only one user group, providing an extended private hunting corridor along a major navigable federal public land waterway. If local hunters desire higher success rates for caribou in August and September, they should pursue expeditions to reach the herd further north and upstream of the Noatak River and harvest more caribou, but they should not use federal authority to prevent traditional non-local hunting activities. Access difficulties that limit local harvest success doesn't justify closing public land corridors to non-local hunting groups that need viable take-out options above Sapun Creek and below the Cutler River.

Warming weather trends are affecting hunter success in this area, not non-local hunter presence or aircraft noise. There is no evidence of frequent user conflict other than local anecdote and community gossip. There must be physical proof of user conflict before restricting the use of federal public lands, and there is no such data.

The real issue in this specific area is that caribou migration has increasingly changed in fall periods to remain for longer periods in the north within GMU 26A due to warming fall periods south of Continental Divide, which results in a recent trend of caribou being farther upstream and north beyond the CUA boundary at Sapun Creek. In order for caribou to be accessed by non-local hunters in GMU 23, a reasonable take-out option by aircraft must be allowed on the Noatak River above Sapun Creek, and the current CUA boundary is adequate. Extending this boundary will make it increasingly difficult for non-local hunters to utilize public land opportunities for hunting caribou, who also desire a float along the upper Noatak River and its tributaries. Reliable take-out options near the Noatak River are critical, since aircraft landing sites are limited on the northern tributaries upstream of Sapun Creek. Local hunters want more public land restrictions to help them reach their subsistence goals, and this a bad precedent to set because non-local hunters and aircraft are not the cause of their unfulfilled subsistence needs. Access, water levels and time of year remain the limiting factors for local hunter success because they hunt by boat and not aircraft. Local hunters are encouraged to explore lands beyond the current CUA boundary for greater hunting opportunities; but trying to restrict public land access by way of extending the CUA is unjustifiable.

Do the right thing for Alaska public land owners,


Larry Bartlett
Alaska Backcountry Hunters & Anglers
Executive Director
bartlettbaalaska@gmail.com



Interior/Northeast Arctic Region Meeting

1 Feb. 2017

Al Barrette

380 Peger Rd.

Fairbanks, AK. 99709

907-452-6047

Personal Comments

Mr. Chairman and members of the BOG.

I respectfully submit my personal comments for your review.

Proposal 47 DNS. This proposal asks to change the definition of what is to edible meat from game birds. It would seem to me, if this was to be changed. Persons would not be able to use those parts that some don not like to use for human consumption, but do like to use for bait. I do not believe there is a wanton waste of game birds currently. I think current salvage requirements are acceptable with current consumptive wildlife users.

Proposal 48 DNS. I would not support, because adding another weapon would add more hunters. If we keep adding weapons that can be use in restricted weapons areas, I think it would be easy to rewrite the regulations to weapons not allowed. As the author also used a point of merit, that younger or older hunter would or could benefit, but it is not exclusive to those groups. Restricted weapon hunts are just as it is indicated "restricted". Restricted in the literal sense does not allow for everyone or weapon. But the board is getting closer each cycle, adding weapons to be allowed in restricted weapons hunts. It may be time to make the regulation to cite which weapons are not allowed, this would be a shorter regulation.

Proposal 49, 50 Support. I believe this was not the intent of the statue nor should it be. I also the think the legislature discuss this while the bill was going though hearings. To give those residents who would like to share and be with family members who are not residents and opportunity to hunt together for a species of big game in this state which is only affordable in most cases to the upper middle class and wealthy. I would hope it is not the intent of the BOG to penalize Alaskan residents for partaking in this exemption in statue, when there is not a stock of concern for that species in that area or region.

Proposal 64 DNS. The issue with this proposal is "sub legal ram". If it is not allowed to be harvested, it cannot be taken. Nannies are legal to take.

Proposal 66, DNS. I do recognize that a special archery season would have a low impact on the harvest, and would provide more opertunity. But what do we do when the muzzle loader users want the same exceptions, what about those who use pistols, what about those over the age of 62? You the BOG have a youth hunt season that starts before the "no use of aircraft" regulation, if this passed it would also be outside the use of no aircraft regulation. It also raises the question why do have a regulation restricting some with uses of aircraft and not others? Lastly, the Haul Road provides and archery only area in the



interior. The last two times the legislature tried to amend the Haul Road corridor statue, the archery community tenaciously at such amendments.

Proposal 69, 70, 71 DNS. Every special group by age, method, domicile or disability wants a special season, longer season, or less limits.

Proposal 73 Support as amended. I don't want the use of dogs to hunt coyotes when there is a trapping season. For all the obvious reason. But this proposal has merit outside the trapping season.

Proposal 77 support raising the brown bear bag limit to two. I do not notice a proposal to sell brown bear hides or skull. But is only mention in the issue section of the proposal. But it is interesting that Brown Bear in unit 21 E have a positive finding of C&T, yet the regulation on bartering big game with a positive C&T only applies to the meat of big game. This would be a good to address. Why only the meat of big game, and the horns/antlers, (if separated from skull) and not the hide/skull of a subsistence taken Brown Bear? 5 AAC 92.200 (b)(1)

Proposal 82 DNS. It would seem from my research resident just choose not to hunt in this area for several reasons. Mostly issues around access/logistics. I do not believe more residents will choose to participate, because there is fewer nonresidents having an opportunity.

Proposal 84 support. But it is noteworthy to point out, that recent federal action on taking of bears, wolves and caribou, that the federal wolf season starts early than the State's.

Proposal 86 DNS. Moving the boundary only moves the issue. You are currently not allowed to shoot on, over, or across a highway or road. Making a corridor, essentially just makes a wider highway or road. The issue will still remain. Some will still shoot on, into, or across the corridor if enacted. Also enforcement issues will remain the same.

Proposal 90 DNS. Consumptive users are still allowed to hunt this area. Regulations do not restrict an opportunity if you are not part of a CSH. Why make an area that is less crowded, into a crowded area? One of the main principles of the CSH is to share. I remember hearing and learning a lot about sharing harvested moose and caribou. How it helped the elders and those with disabilities, and those that could not participate. Instead of making a larger area. Why not educate users about the "proxy hunting". The legislature recognize that not everyone can participate in the subsistence or general hunting opportunities afforded to them, so they enacted AS 16.05.405. This law fits well with the intent of the proposer and a main criteria of community hunting. (Harvest for elders, persons with disabilities, and sharing) Everyone should respectfully share their successful harvest. It does not take CSH or area to teach or practice this. As the proposer suggests it is less crowded and will be adventurous to keep it this way and you can still practice traditional subsistence.

Proposal 100 DNS. This proposal really has nothing to do about WACH decline, or any other caribou herd in decline. I know of no research that attributes aircraft sounds to declining caribou population.

Proposal 101 DNS. Unit 25D has the vast majority of all rural communities with in unit 25. 25D could also be the largest subunit of unit 25. Unit 25D also has been in a Tier II status for decades for moose. Biologically it would be ill advised to take cow moose. I would still advise, not even taking bull moose for any of the community events listed but are not limit to as stated by the proposers. Because there is no harvestable surplus for anything but the most qualified subsistence user, TIER II. Furthermore I think this



would be a great time to review some of the 8 criteria for subsistence uses found in: 5 AAC 99.010(5) “persevering, and storing” so wild resources can be use in for future uses. (6) “values” which includes the value of sharing of a successful harvest and preparing for future uses, gatherings and unforeseen events. (7) “distributed, or shared, and gift giving” all are good criteria of subsistence and should be practiced at locally gatherings or whenever possible. (8) “wide diversity of fish and game resources” Moose may be preferred, but subsistence people need to use all sources of subsistence foods for (8) “cultural, and social” gathering or events. Most game in unit 25 have positive findings of C&T.(except for two areas for sheep and brown bear) I believe if you review why there is a positive C&T on game in unit 25 via 5 AAC 99.010 (1-8) the eight criteria, you may understand why it is not necessary to have a special permit for taking moose out of season, when subsistence patterns and uses already exists. The same proposers are asking for a different finding of C&T for brown bear in 25D. (Proposal 108) I would great if they can show they have used some of this brown bear meat harvest at such events listed in the proposal.

Proposal 103 support. This is not a new proposal. When members of the public, or AC’s have summited the same concept, past Boards voted them all down. The Department believes this would be a good tool. So why haven’t they been using it? They already have the authority per AS 16.05.370 Reports by licensees. (a) The commissioner may require a report to be made by each licensee concerning the time, manner, and place of taking fish and game, the kinds and quantity taken, and other information helpful in administering the fish and game resources of the state.

I would also review AS 16.05.330 Licenses, tags, and subsistence permits.

- (a) Except as otherwise permitted in this chapter, without having the appropriate license or tag in actual possession, a person may not engage in (1) sport fishing, including the taking of razor clams;
- (2) hunting, trapping, or fur dealing;
- (3) the farming of fish, fur, or game;
- (4) taxidermy; or
- (5) control of nuisance wild birds and nuisance wild small mammals for compensation.

I do not see anywhere in the statue chapter “except as otherwise permitted” that the BOG could exempt persons residing north of the Yukon River not to have been require to have harvest tickets/reports.

Proposal 108 Support. It always good to review. But not because a game population has increased, or a bag limit may or has changed. But to check 5AAC 99.010 (b) Each board will identify fish stocks or game populations, or portions of stocks or populations, that are customarily and traditionally taken or used by Alaska residents for subsistence uses by considering the following criteria: So has something changed since the last finding of negative C&T? Bag limits are not part of the 8 criteria.

Proposal 114 Support as amended. I would ask the closing date [MARCH 31], for hunting to be amended to **Last day of February**. I do not support starting the season early. As stated in the board meeting in Bethel last month by board members, that an earlier season for the take of wolverine could impact females that are whining their kits into July. This justified not passing the proposal. Why I would want the season to close earlier (**Last day of February**) is because this is the time pregnant females are going into denning or are already have kits in dens. If you kill one of these females it is 100% mortality on the



whole family after February. I would gather the conservation of the resource is just as important at the start of the season, as should it be at the end of the season.

Proposal 124. This should have already be accomplished per Statues AS 16.05. 370 Reports by licensees.

(a) The commissioner may require a report to be made by each licensee concerning the time, manner, and place of taking fish and game, the kinds and quantity taken, and other information helpful in administering the fish and game resources of the state. Also As 16.05.420 License, tag, permit, and registration violations. The department has been reluctant to use their authority that has existed. What is going to change?

Proposal 134 DNS. Creating a new management area dose not solve this issue of trespass. In fact changes nothing. Privet property is that. Trespassing laws already exist. Non owners have to get permission to trespass on privet lands already. New amendments to trespassing statue void even having the land owner to even post privet lands. It is up to the non- land owner to get permission before enter privet lands. This not what a management area are intended for.

Proposal 135 DNS. Pregnant females are at least going into den sites in February and some may have already had kits. From a conservation of the resource I would not support lengthening the season any further than it already is. If you could I would support shorting the season to the **Last day of February**. At the Bethel meeting last month a couple of board members state that taking wolverine in July when females are whining pups could result in a mortally of some of those kits. Female wolverine that have kits in the den, February through March and are trapped or hunted will result in 100% mortally of those kits in the den. Incidental take is not an issue. But allowing a season for wolverine past February is.

Proposals 141 and 142 DNS. This request to close an area of 20C to no opportunity does not comply with Alaska subsistence law, AS 16.05.258. 20C has a healthy wolf population therefore subsistence users should not be restricted to no opportunity on their traditional trap lines on state lands, when there is no conservation concern. I believe this is pretty clear in the law. Also I believe that stating a subsistence trapper in this proposed closed area could go or move to a different part of 20C to provide opportunity. Would not be consistence with economy effort, a pattern of long use of the resource harvested in the area, and so on. It could be argued that the subsistence trappers in this area meet all of the 8 criteria found in 5 AAC 99.010. Also if the subsistence trapper had to move to a different area to be provided his opportunity, he would be competing and conflicting with subsistence users. The very first trapper's responsibility in the "code of ethics" for trappers is 1. "Respect the other trapper's "grounds".- particularly brushed, maintained, traplines with a history of use.

Viewing opportunity and economical befits to the State and Denali area. If you visit the Denali National Park web site. <https://www.nps.gov/dena/learn/management/statistics.htm> Park statistics. you will see a chart with numbers of people that visited the park from 2000 to 2016.from that chart you can see park visitations has only grown. Couple things to look at on the chart. 1. When the buffer zone was closed to the take of wolves. Park visitation only grew by about 100,000 visitors. Yet in the spring of 2010 the BOG rescinded the buffer zone and visitation grew by about 200,000 more visitors to date, or just under twice as many more visitors. Glitter Gulch the retail/hotel community just outside the park has also grown profoundly. The retail community has not been even remotely effect by the buffer area being opened. There are now stop and go lights, new foot bridges, and bike and foot paths. Capitalists have invested there money and efforts to Denali because it is profitable. If DNP supervisors and leadership had any concern of viewing opportunity for wolves. They have 6,075,030 acres (9,492 square miles) to



find an opportunity for their visitors. Thus would not have to spend time at the BOG meeting every three years trying to convince that current board why there should be a closed area on State land to subsistence users.

Lastly like a couple of other proposals I have commented on. Making a closed area just shifts the issue. Wolves (Denali wolves?) will still get harvested outside the proposed closed area. Case in point. Last spring a male wolf was freshly collared in Denali and was caught shortly after that by a subsistence trapper in the heart of Minto Flats. Wolves have territories and those territories are defined by amount of food resources they access to and size of pack to defend those territories. Not man made areas or boundaries.

Proposal 159 DNS. A better proposal or amendment should be considered. "If a hunter who is found guilty of harvesting an illegal moose, the offender shall attend a moose identification class by the department or an approved organization".

When the BOG changed the bag limit on the bull opportunity in 2012 and 2014. Which resulted in a higher illegal take. Did this happen in other areas of the state where the BOG enacted similar restrictions? How many of the illegal taken moose was from nonresidents? Does data show that this is something that could happen as a result of a new change in the regulation in the first few years but over time hunter educate themselves to what is legal, and thus the illegal take starts to drop? The authors suggest; "are being mistaken for 50 inch bulls by inexperienced hunters". Is this true, and what is an inexperienced hunter? If this is happening because of inexperienced hunters why should experience hunter have to take a class? I would encourage the board not to adopt this as written. The information is already available in the "handy dandy" and the department. The spike/fork, 50" 4 brow tine regulation is not new to Alaskan game regulations.



Submitted By
allen f barrette
Submitted On
1/25/2017 11:26:12 AM
Affiliation
1965

Phone
9074526047
Email
ibalbarrette@yahoo.com
Address
380 peger rd.
Fairbanks, Alaska 99709

Al Barrette

25 Jan. 2017

380 Peger Rd.

Fairbanks, AK. 99709

907-452-6047

Mr. Chairman and members of the Board of Game.

I am the author of proposals 53, 54, 55, and 56. I wish to have these proposals withdrawn from the next scheduled meeting. After the discussion and action by the board at the Bethel meeting on the same issue, if I feel my concerns have been addressed. Due to the time constraints for the Fairbanks meeting. With withdrawing these proposals will help in that endeavor. (to include staff time)

Background for me submitting the proposals: At the last statewide meeting I had submitted a statewide definition for general season. I was told by the Asst. A.G. that I should submit the idea at regional meetings and the proposal was not a statewide issue. (She may have also stated that on record. I do not have the time to research it). So thus the proposals. Also since there are two regional meetings this cycle, the concept is at both meetings.

I was also hoping that since a road map of proposals (Fairbanks meeting) has not been produced as of the time of this letter. That these proposals would not even appear on it. I was led to believe this was not really possible, due to 5 AAC 96.610 Procedure for developing fish and game regulations. Upon review of that regulation. I do not see a citation within that regulation, whereas the board could not remove a proposal when the author wishes so.

I believe the board can withdraw/ not recognize it on a road map for action, via the request of the author. The regulation does not state that this type of action by the board is not allowed. (Thus should be allowed)

But if you believe the intent of the regulation still does not allow the board to completely withdraw a proposal by request of the author and you would like that tool. I would be willing to draft such a proposal at the proper notice of call to do so.

Time for board meetings/staff is very limited these days and if authors of proposals can withdraw their proposals early enough, would you post them/reconize them?

End closing, and due to the process and recommendation, I had to submit proposals at two scheduled meetings, dealing with the same issue regionally. The action at the Bethel meeting satisfies me and I request the board/staff not to spend any more time on the proposals I have requested to be withdrawn.

Have a great day!

P.S. feel free to contact me.

Al Barrette



Submitted By
aaron bloomquist
Submitted On
2/3/2017 4:56:38 PM
Affiliation

Proposal 99

I drafted this proposal and I believe it may have been printed wrong, either that or I sent a rough draft, rather than the final copy. After some thought, would like the proposal ammended to start Wolf Seasons July 25 and leave the current closing dates in all areas. I have heard some dissent from trappers on these proposals due to unprime fur but the vast majority of hunters would find any wolf they take a very valuable trophy. These animals are NOT taken to sell to a fur buyer as is the case with most trappers.

Proposal 114

I drafted this proposal and would ask the board to extend the Wolverine season in at least 26c. ADF&G states that most years there are zero wolverines sealed from the subunit although there is a healthy population in this huge area. If the Board thinks July 15 is too early, I would suggest an open date of August 1 or August 5. This would allow allow most sheep hunters the oportunity to take an incidental wolverine. I have also heard some dissent from trappers on these proposals due to unprime fur but the vast majority of hunters would find any wolf they take a very valuable trophy. These animals are NOT taken to sell to a fur buyer as is the case with most trappers. A wolverine is a trophy most hunters will only have one opportunity to take in a lifetime. It is unfortunate that they may not take one when they have the chance in a vast area where the harvest by trappers is virtually zero.

From: aaron bloomquist
Sent: Monday, October 24, 2016 11:53 AM
To: Pilcher, Nissa R B (DFG)
Cc: Bloomquist, Aaron; Gross, Jeffrey A (DFG)
Subject: Re: Prop 85

Thanks Nissa. I got completely side tracked after I talked to jeff the other day. Please withdraw proposal 85. I was going to send an email right away but I just spaced it. Thanks.



Submitted By
Roaul boyd
Submitted On
12/21/2016 8:55:17 PM
Affiliation

Phone
231-629-4779
Email
Roaulboyd@yahoo.com
Address
Po 10551
Fairbanks, Alaska 99710

I served on the board in the 90's while I lived in Paxson. I felt all resources were used to make educated decisions on regulations.

The cow moose slaughter on the Elliot hwy where I now live, is not acceptable for a healthy moose population. I have lived here since 2000, and the moose population has been decimated since the continued high cow kill along the Elliot hwy.

In the beginning, our numbers of moose allowed it. It was obvious by the car/truck and moose accidents. But now I believe the state is afraid of the presidents set in our eastern states, where the states lost insurance lawsuits and were responsible for auto accidents involving (state property) wildlife.

Living near Livengood, and working in Manley and Minto the last 3 years, with hundreds of miles commuting back and forth really opened my eyes to the fact that our moose are gone!

I rember receiving a letter a few years ago saying something about a fear of a moose population explosion, due to the fires that would cause to much browse and food!!!!

I say bull!

I travel miles and miles on my trap-line through good moose county and never cross a moose track! You can drive from Fairbanks to Manley and not see a moose track! This area can hold a lot more.

Drive through Delta-junction and you see moose in unnatural herds in the fields! Why! This is a very huntable overpopulation.

Seems to me our moose are not being managed very well! It is always too much or too little. Why is common sense removed from all public operations?

I have failed myself, because I have not been involved.

This unwarranted cow slaughter needs to end if we can expect to have a healthy moose pop in this area.



Submitted By
Kevin Burgess
Submitted On
1/24/2017 9:12:56 PM
Affiliation

Proposal #78

I fully support opening the brown/grizzly season on August 10th VS the current opening of September 1st. I believe the number of bears has been steadily growing in unit 19c and I would rather not see them get out of control as they have in other surrounding units. Not only would this proposal increase license and tag sales for the state but it would also provide more opportunity for hunters to harvest bears. I think this proposal strikes a happy medium between a slight increase in the number of bears harvested and maintaining a healthy population of bears in unit 19C. I am in support of proposal #78.

Submitted By
Kevin Burgess
Submitted On
1/24/2017 8:44:54 PM
Affiliation

Proposal # 82:

Having spent a good portion of time in unit 19C in the past 7 years, it is my belief that this proposal is unnecessary from both the biological and the hunter conflict standpoints. The fact that resident hunters have a lower success rates than guided hunters makes perfect sense - they literally have professionals working for them to ensure their success. I do not support this proposal because it's trying to address non-issues in the hunting area.



Submitted By
Jeff Burwell
Submitted On
10/25/2016 8:30:55 PM
Affiliation
none

Phone
907-715-1175
Email
burwelljeff@aol.com
Address
3836 E Country Field Circle
Wasilla, Alaska 99654

I support the Tok area AC proposal 87 to lengthen the NON-MOTORIZED season within the Glacier Control use area. It must be done, in my opinion, and strongly believe there are less then the number (2-6) legal rams that the proposal indicates, at this time!!

Jeff Burwell



Submitted By
Rosemary caskey
Submitted On
1/22/2017 8:24:32 AM
Affiliation

Phone
5024086814

Email
tuttirosecaskey@gmail.com

Address
1510 mulberry st.
West point, Kentucky 40177

Please think, every animal has a right to live. You can't keep killing and killing. Man does not own the earth and everything living on it. We don't have the right to pick and choose what lives and dies, we are not God. What is the world going to be for our children. When we kill off everything that's wild, for sport or room to grow. What then, to we pass s law when only one child is allowed per family, Animals are here for a reason on this earth, they all have a part to play in keeping everything in balance. Please don't disturb this balance, for future generations. Out Children.



CHUGACH STATE PARK CITIZENS' ADVISORY BOARD

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

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

14 November, 2016



Re: February 2017 Board of Game Proposals

I am writing on behalf of the Chugach State Park Citizens Advisory Board regarding regulatory proposals that will affect Chugach State Park. Please consider these comments during the upcoming Alaska Board of Game meeting.

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

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

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

We have carefully reviewed the February 2017 Board of Game regulatory proposals that will affect the park's wildlife and users. Our recommendations passed unanimously during our 14 November, 2016 meeting.

Proposal 152 – Support. This proposal would reauthorize antlerless moose seasons in Unit 14C, some of which are in Chugach State Park. We support antlerless moose seasons in the park to maintain moose populations near the low end (1,500 moose) of the subunit's population objective to avoid overbrowsing of winter range and subsequent die-offs.

Thank you for the opportunity to respond to the regulatory proposals submitted for the February 2017 Board of Game meeting. Please let me know if you have any questions regarding these comments and recommendations. I can be reached at 907-688-9078. Thank you for your consideration.

Sincerely,

Rick Sinnott
Chair

cc: Dave Battle, ADFG



Submitted By
Gary Deeter
Submitted On
2/3/2017 5:05:30 PM
Affiliation

Phone
907-888-6186

Email
gdeeter7@yahoo.com

Address
MP 1361 AK Highway
Dot Lake, Alaska 99737

I am writing in support of Proposal 123 as that would provide a better hunting experience for local residents who hunt in this area. I also do not believe that it would be detrimental to the moose population of the area. Thank you.



Submitted By
Jeff Deeter
Submitted On
2/3/2017 4:58:25 PM
Affiliation

I am commenting on the request submitted by Tommy Geyer Proposal 123 requesting the moose season be lengthened. I am in complete agreement with his submission as this has been my experience also. Thank you!



Proposal# 153 Arctic Western meeting.

Concerning the GMU 17 resident brown bear tag exemption. I just want the BOG to be aware that the reported harvest level in GMU 17 is nowhere near the actual harvest. In the areas of unit 17 accessed by the Nushagak River villagers; I believe the harvest level is at least double the reported harvest. The current attitude is to shoot at any bear any time of year. It is effectively open season year round with no limit. Shot at bears are seldom looked for. Dropped and killed in view bears are seldom legally salvaged.

If I remember correctly, maybe 5 years ago or so, at the BOG meeting it was reported that the legally reported harvest was already several times the harvest objective and the spring season had yet to occur.

The shoot at on site practice has been ongoing and increasing for the last 10 years and is now to a level of normalcy. As a result, the bears are very boat shy and now most of the "educated" bears are nocturnal.

The good news is the moose have begun recovering from the mid 2000s recession. We see some caribou in the Nushagak hills again. Soon it will be time to open a limited nonresident caribou hunt outside the 2 mile corridor.

Don Duncan
299 Alvin Street
Fairbanks AK 99712



To: Alaska Dept. of Fish and Game – Board Support Section
FAX: 907-465-6094
ATTN: Board of Game Comments
From: John Frost Date: January 26, 2017
Reference: Comments for Interior/Northeast Arctic Region
meeting – Fairbanks, AK Feb. 17-25, 2017

Dear Members of the Alaska Board of Game,

Most of you know me. I am a 43 year resident of Alaska living in Anchorage. I am an avid bowhunter and volunteer for many national and state bowhunting, conservation and education programs. I have hunted all of the Alaskan species of big game but especially enjoy mountain hunting for sheep. I have been a member of the Sheep Working Group set up by this Board. I have also been a representative for the Alaskan Bowhunters Association on the Thinhorn Sheep Group that met originally two years ago in Vancouver BC and is scheduled to meet in Anchorage in April this year.

There can be no doubt that we have problems with management and allocation of Dall sheep here in Alaska. For years there have been multiple proposals regarding sheep hunting and this year is no different. Proposals #56-66 in your current workbook all refer to Dall sheep. The fact that difficult problems exist was recognized by the Board and to your credit you established the “Sheep Working Group” moderated by Allistar Bath. Unfortunately, this skilled facilitator was unable to obtain a concensus regarding a solution. Some solutions were (in my opinion) not given adequate or any consideration. In particular the concept of limiting the method of take was never well discussed.



JDF Page 2

20 year experience with Archery hunting for Dall sheep in Alaska GMU 14-C

The following statistics are compiled from ADF&G statistics on Dall sheep harvest success over a 20-year period from 1993 to 2013 for the drawing permits in unit 14-C. Drawing hunts #140 & 141

Total permits awarded - 2424 = 1845 in DS140 and 579 in DS141

Total permittees who actually hunted - 1500 = 62%

Sheep killed 143 = 9.5% success for those who actually hunted.

4.9 days actually hunted for successful residents.

5.8% success for those who had the opportunity to hunt ie; permit holders.

Rams killed 106. Ewes killed 37. So about 3 Rams/Ewe killed even though these hunts are for "any sheep"

Rams killed 106 of those 67 were over 30"; 26 were over 36";
10 were over 38" and 2 were over 40"
39 were under 30"

Making the assumption that rams over 36" are mature full curl rams
Then success rate for mature full curl rams among those who actually hunted was 1.7%

Total number of days actually in the field hunting - 6533

- 4.3 days average in the field for hunters who actually hunted
- 4.2 days average for unsuccessful hunters
- 5.0 days average for successful hunters



JDF Page 3

Non-Resident success

- 18 sheep were killed by non residents
- 12.6% of the sheep were killed by non residents
- Non-residents killed 10 ewes and 8 rams none were over 36"
- 4.2 days average for successful non-residents

The purpose in providing these statistics is to document that use of archery gear as a method and means of harvesting Dall sheep by its nature requires that hunters get much closer to sheep. As a result the harvest success level is significantly less than the harvest success with modern scope sight equipped firearms.

During the period of time that these hunts were conducted it was legal for a permit holder to harvest "ANY SHEEP" yet still there was a low success rate. If only mature rams greater than 36" are counted the success rate was only 1.7% of those who actually hunted. So restricting the legal methods of hunting has the potential to provide opportunity for hunting to a large number of hunters while minimizing the actual harvest of rams at a time when sheep populations are low. Note that restricting the means of hunting has not limited the number of hunters who apply for these very popular drawing hunts.

If the Dall Sheep Working Group determines that the Dall sheep population is low enough to require a significant reduction in the number of sheep harvested for the long term benefit of the sheep population, there are several possible alternative solutions.

- Close the sheep seasons entirely for some period of time as was done in unit 16-B for moose to allow the population to regenerate.
- Close the sheep seasons for alternate years as is done for brown bear in unit 9.
- Go to limited drawing permit hunts statewide possibly for both residents as well as non-residents.
- Stop all non-resident hunting, since nonresidents are more successful than residents and the Alaska Constitution favors residents over non-residents for harvest of wildlife resources.



JDF Page 4

Markedly limit the number of non-resident hunters by drawing permits that would allow only up to 10% of the sheep harvest as is done in most other states.

- Impose some variety of split seasons for all hunters to reduce crowding via various proposals.
- Limit methods of access such as has already been tried with PROP 207 limiting aircraft use (which has been shown to affect resident sheep hunters disproportionately, has added significant safety issues, has resulted in regulation pollution of the hunting experience, has resulted in some hunters not hunting and resulted in the formation of RHAK). **I personally believe that 207 should be repealed. See my proposal #63.**
- More severely limit methods of access such as walk in only from the highway system ie; no off road vehicles, boats, snow machines or aircraft to transport sheep hunters or their gear into sheep country.
- Limit the legal animals full curl as is done now or maybe even curl and a quarter or ten years old or double broomed with at least 6" circumference 1" back from the tip or greater than 40".
- Limit the method and means of harvest such as conventional archery only or hunting implements with no optical sights attached allowed in the field. The advantage of these types of limitations is it would allow everyone who wanted to hunt the opportunity to do so and would not restrict guides from selling hunts in any way. **Frankly, this option or the next one would be my preferred option. See Proposal#66.**
- Have a series of hunts with gradually increasingly effective weapons but give earlier seasons and longer warmer days to those willing to hunt with restricted gear and make hunters choose their seasons. Example would be August 1-11 conventional archery only statewide; August 12-31 no optical sights on weapons statewide; September 1-20 no weapons restrictions. You could control hunters choosing their seasons by making all hunts registration. That would give very accurate information about how many hunters chose which seasons and their relative success rate.



JDF Page5

The bottom line is that if it is necessary to significantly reduce the harvest of Dall sheep to protect the long term viability of the sheep population then some method must be chosen. There may well be other methods but I believe that I have covered most of them. It seems to me that limiting the methods and means provides the best opportunity to reduce the harvest rate and allow some rams to gain old age and true trophy size with out reducing the opportunity to hunt sheep for anyone willing to accept the limited range weapons.

My preferred solution would be Proposal #66 to have an archery season for sheep prior to the regular firearm season. This would reduce crowding on August 10th. It would provide guides with an extra hunt to sell if they were willing to book non-resident bowhunters. Not all sheep guides would choose to guide bowhunters but some would. The low harvest rate among bowhunters would not harm the sheep population. It should be noted that this proposal does not ask for "any sheep" or "any ram" but only for full curl, double broomed or eight plus years old.

I would also like to comment briefly on a couple of other proposals.

Proposal #71: To allow hunters over age 60 to hunt with crossbows. I **OPPOSE** this. Alaska already has provisions for disabled hunters to get a permit to hunt with crossbows so anyone too old or weak to pull a conventional bow could get a disabled permit. I am 71 years of age and still hunt with a compound bow well above the 50 pound minimum draw weight required by our regulations for hunting big game.

Proposal # 72: To allow harvest of wolf and coyote by land and shoot methods with a trapping license. While I do **SUPPORT** this proposal, it must be realized that federal law still makes it illegal to disturb any wildlife with an airplane. So if this



JDF Page 6

regulation is passed by the Board it would be similar to marijuana being legalized by the state while still illegal under federal regulations. At this time it is legal to shoot fox, lynx and coyote on the same day as airborne as long as the hunter is more than 300 feet from the airplane. I would suggest that the Board consider allowing the take of wolf and wolverine in season by hunters or trappers who have been airborne as long as they are at least 300 feet from their aircraft. Predator

JDF Page 6

calling is becoming increasingly popular. A hunter or trapper might fly out in the morning, land and hike several miles during the day and set up every half mile to call predators. Currently if he calls in a fox, coyote or lynx he can legally shoot it but if a wolf or wolverine comes to his call he can not shoot it. Allowing take of wolf or wolverine in addition to fox, coyote and lynx on the same day as airborne as long as the hunter is over 300 feet from the airplane would stimulate a significant increase in predator calling outdoor recreation by Alaskan hunters and trappers and would have negligible effects on populations of those species.

Proposal #112: To allow same day airborne hunting for wolf in Unit 25D. I also **SUPPORT** this proposal with exactly the same comments as for proposal # 72 above. Include wolverine, make it region wide with the provision that the hunter be 300 feet from the plane before shooting.

Thank you for your time and consideration of my comments.

Sincerely,

A handwritten signature in cursive script that reads "John D. Frost".

John D. "Jack" Frost

jackfrost@gci.net

907-360-1301 FAX 907-562-5742



**GATES OF THE ARCTIC NATIONAL PARK
SUBSISTENCE RESOURCE COMMISSION
4175 Geist Road
Fairbanks, AK. 99709
(907) 455-0639 or FAX (907) 455-0601**

November 21, 2016

Ted Spraker, Chair
Alaska Board of Game
c/o ADF&G Boards Support
P.O. Box 115526
Juneau, Alaska 99811-5526
Dfg.bog.comments@alaska.gov

Subject: Comments on proposals for January 2017 Arctic and Western Region meeting and the February 2017 Interior and Northeast Arctic meeting

Dear Mr. Spraker,

The Gates of the Arctic National Park Subsistence Resource Commission (SRC) met in Fairbanks, Alaska on November 15, 2016. The SRC reviewed five proposals that will be considered at the Arctic and Western meeting in January 2017 and one proposal for the February 2017 Interior and Northeast Arctic meeting.

Proposal 1: Evaluate a separate amount reasonably necessary for the subsistence for the Teshekpuk Caribou Herd

The Gates of the Arctic National Park Subsistence Resource Commission voted to take no action at this time.

Proposal 2: Modify the hunt structure of the Western Arctic and Teshekpuk Caribou Herds

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposed this proposal. The Alaska Department of Fish and Game (ADF&G) should not propose this regulation when they do not have the capacity to educate local hunters on how this regulation will affect them. This regulation has the potential to allow ADF&G to cite local hunters who may be unaware of the regulation. Harvest reporting has been shown to be ineffective in the past.

Proposal 3: Remove the exception to harvest tickets and reports for caribou

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposed this proposal. This proposal would create an undue burden on local hunters, also known as super hunters who harvest large numbers of caribou for the elders, widows, and needy in their communities. A super hunter would have to apply for multiple harvest tickets in order to document the number of caribou he or she has harvested. Harvest reporting should come from

~~numbers.~~ the community at large, perhaps from the tribal councils who could provide community harvest numbers.



Proposal 4: Institute no-fly zones for caribou hunting in Units 21D, 22, 23, 24, and 2

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposed this proposal. This proposal is not feasible due to possible weather delays that could affect flying time.

Proposal 11: Remove the exception to harvest tickets and reports for sheep

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposed this proposal. The National Park Service is monitoring the Dall's sheep harvest by working with the community of Anaktuvuk Pass in order to assess harvest on Arctic Slope Regional Corporation and Nunamiut Corporation lands that fall under State regulations.

Proposal 113: Modify the resident bag limit for Dall sheep in Units 24B, 25A, 26B, and 26C

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposed this proposal. The federal subsistence regulation for units 24A and 24B has recently changed from any 3 sheep to 3 sheep, no more than one of which may be a ewe. The communities of Wiseman and Anaktuvuk Pass are currently under an informal self-imposed restriction on hunting ewes. Low harvest rates and local traditional practices are addressing the decline of the sheep populations.

- Thank you for the opportunity to comment.

Sincerely,

Louie Commack
Chair

And

For the chair

Jack Reakoff
Vice-Chair

Cc: NPS Alaska Regional Director
Superintendent, Gates of the Arctic National Park and Preserve
Governor of Alaska

Chair: Louie Commack, **Vice-Chair:** Jack Reakoff; **Members:** Taqulik Hepa, Pollock Simon Sr., Hugh Bifelt, Tim Fickus, and Sam Kunaknana



Submitted By
Tom Geyer
Submitted On
1/27/2017 9:55:30 PM
Affiliation
hunter

Support proposal 123

As author of this proposal, I wanted to give a few more reasons why I feel it would be helpful.

The Tanana Valley is heavily wooded in Eastern 20D. Vantage points to spot and stalk bull moose are few. An extended season in this area which would also include Johnson Slough Island would increase hunter's odds of calling in a bull moose.

The Tanana Valley in Eastern 20D is pretty dead (in regards to moose activity until about the 13th of September, which leaves very little opportunity for a hunter to be successful.

I am not from Dot Lake, but was hoping for a better opportunity for them and other desperate local hunters. The community of Dot Lake is averaging about one moose per year for their entire village. They are having to scrape up road kills off of the highway just to try to get some meat for the winter. I have spoken to locals from Dot Lake who hunt moose, and they believe that an extended hunting season would help them with their moose harvest.

I realize that the Delta Advisory Committee did not support this proposal, which did not surprise me. I understand that several abstained, but I'm not sure of the actual vote. Two reasons were relayed to me as to why:

1 *As moose would be coming into rut, meat quality would be poor.* My thoughts on this are that many, if not most of the moose seasons in Alaska are open until the 20th of September, and some open as late as the 30th.

2 *Eastern 20D would be inundated with road hunters* The moose season in Unit 12 (just due east of SE20D) is open until the 18th of September, aligning the 2 units for 18 days. My personal observation is an influx of road hunters at the beginning of the season, and that pressure seems to dwindle as the season progresses. If this is a serious concern to the Board of Game, I would like for you to consider at least extending the season to the 18th of September, thereby aligning it with GMU 12 to the east. If not a serious concern, then until the 20th of September.

In conclusion, I would like to point out that ADF&G is neutral on this proposal, meaning that there are plenty of moose to sustain a modest additional harvest. If they were concerned about overharvest, cow-calf ratios or the moose population in this area, they would certainly not be neutral. Thank you for your consideration.
Tom Geyer

Submitted By
Tom Geyer
Submitted On
1/27/2017 8:10:51 PM
Affiliation
hunter

I oppose proposal 116. I believe that there are no scientific grounds to reduce the bag limit for ruffed grouse in the Delta area. Grouse populations run in cycles and may boom or bust in accordance to food available, abundance of predators and weather during hatch. These factors may be more significant than hunting pressure, as much of unit 20D is untouched by bird hunters anyway. Thanks for your consideration.



Submitted By
Kyle Jones
Submitted On
2/2/2017 4:32:40 PM
Affiliation
Resident

As the original author, I continue to support proposal 49 in both its original form and as amended by the Board to apply statewide. I understand the Board's hesitancy to adopt the proposal as amended, given the sharp and well deserved criticism for past board generated proposals. Although this change technically triggers a board generated proposal, we can all agree that this is a different situation than those the Board has been condemned for in the past.

My intent for this proposal is for it to eventually apply statewide. Modifying it to apply statewide and adopting it during the Interior Region meeting meets this objective in a timelier manner. The public has had ample time to review and comment on the effect of statewide implementation, since this was first discussed in November and then again at the Arctic and Western Region meeting in January. The comments, from both the public and the advisory committees, have been overwhelmingly in favor of adopting this proposal. Comments opposed to the original proposal 51 to restrict the bag limit statewide vastly outnumbered those in support. The Department of Fish and Game has also stated their preference that this proposal be adopted statewide, rather than piecemeal. Delaying adoption of this proposal creates additional costs and burden to the Department as they work to implement a system to track and report second degree kindred (2DK) participation. A delay of this proposal to the 2018 statewide meeting puts the implementation of the resident bag limit restrictions just a few months away from a potential resolution, which will jeopardize hunt planning for those that may wish to participate in a hunt with their family members.

I urge the board to adopt proposal 49 to apply statewide. I also urge the Board to reject substitute language as proposed by the guide lobby at the Arctic and Western Region meeting as RC28. The intent of their proposed amendment is to further subsidize the tags that have been granted exclusively to guided non-resident hunters by removing 2DK non-residents from the non-resident pool and placing them in the resident pool of tags. I trust the Board would not look to further restrict resident allocation in this manner.



Submitted By

Lee Kayotuk

Submitted On

2/1/2017 3:40:14 PM

Affiliation

Kaktovik representative for North Slope Advisory committee and for North Slope Regional Advisory Committee

Comment on Proposal 104: As a member of the community of Kaktovik and a representative for Kaktovik on both the state's North Slope advisory committee and the federal North Slope regional advisory committee, I **oppose** proposal 104 to extend the Porcupine caribou seasons in Unit 26C. I am speaking for Unit 26C. We like the current season. We like to give the caribou a month or so to move because they are migrating when they show up and then they are calving. This provides time for the calves to become stronger. We do not hunt them in June except during the week long bull season. It has been this way for a long time. We wish to keep the current seasons and make no changes.



Good morning Jeff,
Yes my proposal was, and is for the board of game to place a 1/4 mile no shoot zone on both sides of the road during any open Caribou hunt.
The reason i only specified Caribou is because of the nature of the hunt. When the Caribou are in there are hundreds, sometimes thousands of animals. Hunters go crazy, they shoot on, from, and across the road, regardless of background. This is contrary to existing State law. Further they often leave gut piles in or along the road. Also contrary to existing law.
This hunt has gotten to be way out of hand is is a public hazard.
I believe the 1/4 mile no hunt zone on both sides of the Taylor Highway, and Top of the world highway is the best way to bring this under control, and is in the best interest of the public, and the Caribou herd.
As for hunting other species such as bear, moose and birds, these hunts haven't had the impact that the Caribou hunt has had... Altho, i believe the State law should be enforced as to shooting from, on or across the road for any hunt.
I hope this helps. Any further questions are welcome.,
David Likins
Fortymile River ,Alaska

.....

On Fri, Oct 21, 2016 at 1:46 PM, Gross, Jeffrey A (DFG) <jeff.gross@alaska.gov> wrote:

Hi David,

I need to ask you a clarification question about your Fortymile Caribou Board of Game proposal. It was my impression that you intended to establish a no shoot corridor along the Taylor Highway and Boundary Cutoff roads for caribou only. But F&G Boards support interpreted your proposal as asking to have a 1/2 mile no hunt corridor, during caribou season, that would apply to ALL species (including moose, bear, grouse, etc). A no shoot corridor for all game species is obviously a substantially different proposal than just for caribou. I am drafting the department analysis and recommendation for your proposal and I need to clarify this, so I know how to write the analysis.

Also, if your intent was just for caribou, I'll need to ask you to submit a comment to the Board of Game, through Nissa Pilcher in Fairbanks, clarifying this point. I have cc'd Nissa so you have her email.

Thanks David!

Jeff Gross



Douglas Malone Comments to the Alaska Board of Game

Region III, Fairbanks, February 2017

Good afternoon. Thank you, all Board members and staff, for the large time commitment you put into public service via this board. Douglas Malone writing; what follows is my personal comments on the proposals before you this cycle for the Interior and NE Arctic Region. Thanks in advance for your consideration of my thoughts.

PROPOSALS SUPPORT: 46, 49, 50, 63, 68, 72, 81, 94, 95, 97, 105, 113, 127-9,

PROPOSALS OPPOSE: 64, 83, 93, 100, 159, 141, 142

PROPOSAL 159, OPPOSE moose hunter education in Unit 15. I oppose the adoption of proposal 159. This idea was submitted as an ACR and accepted as a proposal at the October telephone meeting. This is clearly out of cycle and shaky in opportunity for public comment. It is notable that the proposers did not seek comment from other local, affected, fellow Unit 15 Advisory Committees, neither in drafting the original ACR, nor soliciting support for the proposal. The proposers point to a high sub-legal bull moose harvest as their conservation basis. However, what the proposal doesn't say is that Unit 15 is the only place in the state with general season moose antler sealing requirements (just adopted 2 years ago), so in effect it is the only Unit where such a number (number/percent of sub-legal take) would even exist in data. I would wager that similar percentage of sub-legal moose are taken anywhere moose antler restrictions exist (most of the road system). The proposer states a conservation concern but we are at the high end of population objectives and have been meeting the harvest objective.

This is really a case of hunters responsibility. As hunters, we take the onus of expectancy to know license requirements, land ownership, animal appearance and habits, firearms safety, upholding ethics etcetera and most of us do so gladly. If a person needs some education on a particular subject, he would obtain that, it is ever increasingly easy to do so. Without an additional mandate. Overregulation is not the answer. Enforcement would go a long way toward forcing



compliance...just some presence out on the trails would be enough. I know AWT budgets are tight, but I did hear from our local troopers that they have a directive to make a presence next season. I welcome that and think the sublegal take would diminish greatly. What about the idea of some department presence in the field during season? Schedule a browse survey, show up in blue hats; most people (sadly) don't differentiate between AWT and biologists so this would be in effect a deterrent to being hasty in judging that moose.

This proposal should be tabled until such time as sublegal take in other railbelt units can be quantified, so as to not unduly restrict Peninsula hunters over other road system hunters with regulatory pollution

PROPOSAL 51: SUPPORT as amended in Bethel RC#28 (change wording from "plan" to "program")(Restricting Nonresidents first when a population is not reaching IM goals). This is a bright new idea I am in **support** of. If we have an active IM program on a wildlife population to provide for high level of human harvest for Alaskan residents' beneficial uses under IM law, there is no reason to allow nonresident take if we follow statutory preferences in 16.05.255d and 16.05.258 for subsistence first, followed next by personal use by residents second, and nonresident commercial, sport or otherwise third. I believe this can be condensed by saying that nonresident use of a population with a C&T finding should not be permitted if the harvestable surplus is below the ANS. Perhaps the best way to posit this is to consider the reciprocal: If we had taken steps such as restricted nonresident take earlier, perhaps the State of Alaska's reliance on and expense of Intensive Management would not have been needed in a particular population in the first place; indeed IM carries both a large fiscal note and myriad public concerns. In my opinion, Proposal 51 matches and complements the statutory intent (to first provide high levels of resident human consumptive use i.e. meat for Alaskan residents) and seems common sense to me. Considering the pushback of "nonresidents' meat largely benefitting village residents, I would counter by commenting that:

- a) donated meat normally goes only to the nearest village, not distributed equally amongst those regional Alaskans.
- b) Donated or gifted meat has been seen by some as arriving in poor condition for human consumption.



- c) I would wager that a majority of residents would RATHER harvest their own, in accordance with personal preferences in field care and butchering, and in the interest of furthering the hunting tradition to future generations.
- d) The practice of “gifting” meat should be forbidden. In going hunting, we as hunters should be expected to use the animal to the extent practicable. Eat the meat, wear the fur, hang your jacket on the antlers when you go to the outhouse. Hunting is not a sport, it is a means to provide.

PROPOSAL 52: SUPPORT draw allocation at 10% NR max. I look at this proposal as forward-thinking and progressive. It is true there are not many instances of mis-allocation in current draw hunts, but our climate of hunters and game is changing at a great rate. A lot of hunts have gone to draw in recent years. Shifting pressure. It would be wise to get in front of future resource conflicts by codifying a 10% maximum permits allowed regulation. Discussions that now revert to an interpretation of an older, regressive Board finding 2007-173 BOG will be streamlined.

PROPOSALS 53-56: I support the direction the proposer is going with these language changes. Subsistence take has priority in statute, Alaska residents should be included in all related language in code.

Proposals 57 through 62: The allocation of sheep issue. I support a 10% cap and **SUPPORT PROPOSAL 62** as the best of this years’ crop of public proposals asking the Board to restrict nonresident sheep harvest, in that it best includes the necessary steps of implementation: a statewide nonresident harvest guideline level and nonresident draw in order to implement, and also is directed at harvest, not just permitted hunts. In light of the ongoing sheep population declines and increased user conflicts in the field, it is foolish to continue to allow nearly half our sheep to be taken by nonresidents. I support capping the nonresident harvest of our sheep resource at 10%. No more. This is what our state’s Founders intended in Article 8: maximum benefit for the people. “The people” ,taken in context from Alaska’s Constitution, certainly implies “Alaskan people” a.k.a. residents. Take precedence from long-existing codified sheep and goat hunt



allocation (TMA 10% Chugach 13%, Delta 10% etcetera in 5 AAC 92.057) and apply statewide. Not only would limiting Nonresident sheep take via 10% harvest cap help the sheep population, it would greatly improve the field crowding complaints: Nonresident hunters typically hire guides, who have multiple and big camps, multiple planes, horses, cooks and packers, lots of people and activity. Nearly verbatim proposals have been before the Board of Game for many many years...it is time to give sheep allocation a try at 10% NR cap. Lets start in the interior region as a precursor to statewide applicability.

PROPOSAL 63: SUPPORT removal of aircraft restrictions for sheep hunting. You have had earfuls of antagonism of this in the last couple cycles since quickly introducing and passing this Board- generated proposal into regulation. This has had no effect on sheep numbers, empirically speaking of course. This has actually had a negative effect on crowding as well as extended the time that the field is inundated with people. Before, the commercial interests could at least have the field to themselves the week or two prior to opener. Now I see “decoy tents” and camps going up in July. The Board Finding addressing the intent of this rule is not sufficient to alleviate my concerns as an ethical and respectful hunter trying to also access remote Alaska and maintain safety for myself and others. The regulation still reads the same. Very difficult enforcement job for our over-extended AWT. Please faithfully consider Proposal 63 and thank you for reading.

PROPOSAL 64: OPPOSED I asked several Kenai Peninsula ADFG managers about the measured effect this has had on goat populations (where similar nanny take penalty has been in effect for some time). They were unable to point to any population increase as a result.

PROPOSAL 83: OPPOSED to adding a Mulchatna Caribou nonresident hunt: The Mulchatna Herd, after many years of decline, has only begun to recover, thanks in part to IM efforts. We need to let it grow. Especially considering last years liberalization of this hunt at the Statewide meeting, We do not yet know the effect of that action on the population. Interestingly, 19A and 19B, which the proposer wishes to add (19 C and D are already open by harvest ticket for nonresident hunters) is the home of all the nonresident moose closure river corridors. Hardly an environment that suits adding a NR hunt. Perhaps the best argument, Mulchatna is still under Intensive Management, so by the logic above



in Proposal 51, why are we allowing ANY nonresident harvest before meeting the needs of Alaskans? Back in the mid-late 90's Mulchatna caribou was a fantastic opportunity for everybody, I urge the Board to reject Proposal 83 and let the herd and that opportunity return.

PROPOSAL 93: OPPOSE removing Bettles winter road exemption. The Bettles winter trail is a state easement and uses public funds for maintenance. The State should stand up to the BLM for access rights in re the Central Yukon Management Plan under review by BLM.

PROPOSAL 94: SUPPORT modification of 21D moose season for meat care concerns. Thanks to the Board for implementing a similar change to Kenai Peninsula moose season back in 2015, local hunters have had better meat care conditions in the last couple years as a result. Having a fair bit of experience in Unit 21 moose hunts, I support a similar direction here.

PROPOSAL 95: SUPPORT changing DM 812,896 to registration hunts. I have had the good fortune to have hunted both of these in the last 4 years. Hunter participation is historically low due to remoteness and pressure is minimal. On the Dulbi in over two weeks of aircraft-supported float hunting, I saw zero other hunters in 40 miles of river. On the Hog, we saw one other float party and one guide with a single client in 2 weeks on the river. Really excellent country and wilderness character hunts and I would love the opportunity to return without the need to draw a permit. Some of us really enjoy remote logistical and meat care challenges.

PROPOSAL 97: SUPPORT removing MBG for moose. I do not believe the Board of Game has the authority to add species to Must-Be-Guided statute, as they have with moose in Unit 21 and 24, and black bear in Southeast. AS 16.05.255a(10) gives the Board very broad authority, but not so broad so as to undermine the intent of the legislature in AS 16.05.407, to further subsidize commercial interests, and to in effect benefit nonresident hunters over resident hunters.

PROPOSAL 100: OPPOSE no fly caribou hunting. Restricting aircraft use is not the way to build the WAH. . The proposed area is huge and remote, aircraft are a part of life in the Bush. Don't believe the authority is there; to create such a large CUA. This would be extremely hard to enforce for our AWT. Pits hunter against hunter, the last thing the hunting heritage needs. The caribou are arguably



disturbed also by the mail and commuter planes, exploration and research support aircraft, and all the riverboats. This proposal is attempting to build on the (shaky) precedent of new aircraft restrictions for sheep hunting which I opposed on similar grounds. See also my comments on proposal 63 above. Please vote no on Proposal 100.

PROPOSAL 105: SUPPORT as AMENDED by ADFG. I have had considerable personal experience watching the CAH decline and do not understand why we still allow nonresidents to harvest 5 caribou. I think they only want one to hang on the den wall, and 5 animals worth of meat, per nonresident hunter, is an awful lot of meat to “donate” to not very many villages that are spread far apart. ADFG has amended the original proposal in their comments to be stricter, and I support the amended proposal.

Thanks again for considering my thoughts. I look forward to the deliberations, and to speaking with you all in Fairbanks!



Submitted By
Jeff Mosso
Submitted On
1/17/2017 9:22:16 PM
Affiliation

I would like to formal support Proposal 19 - 5 AAC 92.130 and the removal of an unfair and punitive rule that unjustly punishes the resident hunter who only wanted to share a hunting experience with his or her 2nd degree kindred. The rule, as it currently stands, is unfounded and does nothing but put undue restrictions on the resident hunter. Nothing else beyond this is achieved by leaving this rule in place. Please support the immediate removal of this rule as it unjustly undermines the original intent of the 2nd degree kindred authorization. Lets not alienate our residents. Lets go forward and get this one off the books as this rule is not a matter of conservation but one of discrimination against the resident hunter.



United States Department of the Interior

NATIONAL PARK SERVICE

Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:
10.D. (AKRO-NR)



DEC 21 2016

Mr. Ted Spraker, Chairman
ATTN: Alaska Board of Game Comments
Alaska Department of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Spraker:

Thank you for the opportunity to participate in the Board of Game process. As has been mentioned in both written and in-person testimony, the vast majority of Board decisions are in alignment with National Park Service (NPS) management objectives. We appreciate your consideration on the handful of proposals that may not be consistent with NPS-related statute, regulation or policy. Following are NPS comments on proposals before the Board of Game during the February 17-25, 2017 meeting in Fairbanks that have the potential to affect National Park Service (NPS) areas in the state.

Proposal 66: NPS Recommendation: Oppose.

This proposal would open an archery-only hunting season for Dall sheep in the Interior/Northeast Arctic Region including GMUs 12, 19, 20, 21, 24, 25, 26 which includes areas of Gates of the Arctic National Park and Preserve, Denali National Park and Preserve, Lake Clark National Park and Preserve, Wrangell-St. Elias National Park and Preserve, and Yukon-Charley Rivers National Preserve. The NPS does not support extending the season in areas where harvest is not limited by quotas and sheep populations are in decline. For example, Gates of the Arctic National Preserve (GMU 26A) has a popular general hunt and extending the sheep hunting season has the potential of increasing harvest following a large decline in 2013. These proposals should be evaluated on a unit-specific basis to ensure conservation of specific populations rather than applied state-wide. Because these proposals create a potential for increased sheep harvest in a time of declining sheep populations, we ask that NPS lands be excluded if this proposal is adopted.

Proposal 67: NPS Recommendation: Oppose.

This proposal would lengthen the season for bear baiting in the Interior/Northeast Arctic Region, which includes NPS Preserve lands. NPS regulations prohibit the harvest of black and brown bears over bait.



If the Board adopts this proposal, the NPS requests that park exemptions be reflected in the Alaska Hunting Regulation booklet. This request is in the interest of hunters in the field interpreting the difference between State and Federal regulation.

Proposal 72: NPS Recommendation: Oppose.

This proposal would allow the harvest of wolf and coyote by land and shoot with a trapping license in the Interior/Northeast Arctic Region (GMUs 12, 19, 20, 21, 24, 25, 26B & C), which includes areas within Gates of the Arctic National Park and Preserve, Denali National Park and Preserve, Lake Clark National Park and Preserve, Wrangell-St. Elias National Park and Preserve, and Yukon-Charley Rivers National Preserve. Same-day airborne taking of wildlife including coyote is prohibited by NPS regulations.

If the Board adopts this proposal, the NPS requests that park exemptions be reflected in the Alaska Hunting Regulation booklet. This request is in the interest of hunters in the field interpreting the difference between State and Federal regulation.

Proposal 73: NPS Recommendation: Oppose.

This proposal would allow the use of dogs to hunt coyote in Unit 20 including portions of Denali National Preserve and Yukon-Charley Rivers National Preserve. Excepting black bears, the use of dogs to hunt big game or fur animals is currently illegal under State regulations and the NPS supports this restriction to protect wildlife populations from disease, injury, and harassment. The proposal also references the action as a means to increase small game populations for hunters and, therefore, would conflict with NPS regulations that prohibit predator reduction efforts with the intent to manipulate predator/prey dynamics.

If the Board adopts this proposal, the NPS requests that park exemptions be reflected in the Alaska Hunting Regulation booklet. This request is in the interest of hunters in the field interpreting the difference between State and Federal regulation.

Proposal 90: NPS Recommendation: Oppose.

This proposal would expand the Copper Basin community harvest hunt area by adding a part of Unit 12 including that portion within the Nabesna River drainage west of the east bank of the Nabesna River upstream from the southern boundary of the Tetlin National Wildlife Refuge. The proposed expansion area is entirely within the boundaries of Wrangell-St. Elias National Park and Preserve. The Wrangell-St. Elias National Park Subsistence Resource Commission has expressed concerns about the potential for increased hunting pressure in Wrangell-St. Elias National Preserve that could result from this expansion in an already sees high numbers of hunters and significant hunting pressure. Additionally, they feel that the community hunt is not working and have recommended discontinuing the community hunt and starting discussions with stakeholders in the Copper Basin about alternatives. We support the Commission's recommendations to oppose expansion of the hunt area until stakeholders are engaged to discuss options.



Proposal 91: NPS Recommendation: Support with modifications.

This proposal would modify the hunting season and bag limits for grouse in Unit 12, including areas within Wrangell-St. Elias National Preserve, to reduce take from fifteen per day, thirty in possession Aug 10 - Mar 31 to a daily bag limit of five grouse per day with a possession limit of ten, except two per day and possession limit of four, for ruffed grouse August 20—November 10. The NPS agrees with the proponent of this proposal that the existing the bag and possession limits are likely too high given the current hunting pressures, especially in road accessible areas. Large groups of hunters are often observed along the Nabesna Road (GMU 11 & 12) and McCarthy Road (GMU 11) who harvest their limits, resulting in significant take of grouse. The NPS supports the proposed change in harvest and possession limits for grouse; however, we recommend modifying the proposal to retain the existing season dates to maintain the opportunity to harvest grouse in the winter.

Proposal 99: NPS Recommendation: Oppose.

This proposal would shift the hunting season for wolf in Units 24 including portions of Yukon-Charley Rivers National Preserve forward by 11 days. The NPS does not support the taking of wolves during the denning season when their pelts have little trophy, economic, or subsistence value; or when harvest appears to be wanton waste. NPS regulations prohibit the taking of wolves between May 1 and August 9.

If the Board adopts this proposal, the NPS requests that park exemptions be reflected in the Alaska Hunting Regulation booklet. This request is in the interest of hunters in the field interpreting the difference between State and Federal regulation.

Proposal 109: NPS Recommendations: Oppose.

This proposal would lengthen the brown bear hunting seasons in Units 25A, 25B, 25D, 26B and 26D including areas within Gates of the Arctic National Park and Preserve and Yukon-Charley Rivers National Preserve. This proposal would open the State season 8 days prior to the Federal season, which may negatively impact federally-qualified subsistence users. This proposal is not consistent with efforts to align State and federal seasons. It would increase the complexity for Alaskans trying to abide by all applicable State and federal harvest regulations.

Proposal 114: NPS Recommendation: Oppose.

This proposal would lengthen the hunting season for wolverine in Unit 26 including portions of Gates of the Arctic National Park and Preserve. The NPS does not support the taking of furbearers when their pelts have little trophy, economic, or subsistence value; or when harvest appears to be wanton waste. Wolverine taken by sport hunters in the summer also reduces opportunity and potential economic gain by local subsistence trappers. For these reasons, we ask that the Board exclude NPS lands if this proposal is adopted.



Proposals 141 & 142: NPS Recommendation: Support.

Proposal 141 would close small portions of Unit 20 adjacent to Denali National Park and Preserve to the taking of wolves. Based on scientific research, we found that limiting harvest of wolves along the boundaries of protected areas was associated with increased wolf-sighting opportunities for visitors to these areas. This in turn could increase associated economic benefits to adjacent communities. We continue to support the protection of wolf-viewing opportunities in Denali National Park and Preserve and will attend the February meeting to testify and answer any questions.

Proposal 142 would close more of Unit 20 to the taking of wolves than would proposal 141. While the NPS proposes something more modest, the Park Service also supports proposal 142 as a strategy to increase wolf-sighting opportunities and associated economic benefits to adjacent communities.

We appreciate the Board's recognition that laws, regulation and/or policies affecting the NPS may differ from the State, and may even require different management approaches. Where that is the case, we ask that NPS areas be excluded from regulations implementing intensive management objectives in Alaska's hunting regulations. We recognize and appreciate previous Board actions where consideration has been given to exclude intensive management measures on NPS-managed lands.

Again, we appreciate the opportunity to provide you with comments on these important regulatory matters and look forward to working with you on these issues. Should you or your staff have questions or comments, please feel free to contact me at (907) 644-3505.

Sincerely,

A handwritten signature in cursive script that reads "Debora Cooper".

Debora Cooper
Associate Regional Director



Alaska-Yukon NAVHDA
20508 Mark Circle
Chugiak, AK 99567

January 10, 2017

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



Chairman Ted Spraker and Board Members:

The Alaska-Yukon Chapter of the North American Versatile Hunting Dog Association submits these comments in opposition to Proposals 47, 91, and 116. Alaska-Yukon NAVHDA has 36 members who are active both training and hunting with dogs. Alaska-Yukon NAVHDA is a sanctioned chapter of NAVHDA, one of the largest hunting dog organizations in North America, and is dedicated to fostering, improving, promoting, and protecting the versatile hunting dog; to conserving game by using well-trained reliable hunting dogs on both land and water; and aiding in the prevention of cruelty to animals by discouraging non-selective and uncontrolled breeding, which produces unwanted and uncared for dogs. Alaska-Yukon NAVHDA conducts yearly NAVHDA-sanctioned hunting tests, hosts professional training clinics, conducts member led training events, and provides the resources to enhance the training of versatile hunting dogs. These proposed regulations would have significant negative impacts on our dedicated and responsible members.

PROPOSAL 47 - AAC 92.990(A)(26). Definitions. Modify the definition of edible meat for all game birds as follows:

“Edible meat” means, ...; **for all game birds, the meat from the breast, back, thighs, legs;** replaces [IN THE CASE OF SMALL GAME BIRDS, EXCEPT FOR CRANES, GEESE AND SWAN, THE MEAT OF THE BREAST; IN THE CASE OF CRANES, GEESE, AND SWAN, THE MEAT OF THE BREAST AND MEAT OF THE FEMUR AND TIBIA-FIBULA (LEGS AND THIGHS);] however, “edible meat” of big game of small game birds does not include meat of the head, meat that has been damaged and made inedible by the method of taking, bones, sinew, incidental meat reasonably

Alaska-Yukon NAVHDA Comments: We oppose this proposal. Alaska-Yukon NAVHDA made similar comments on proposals submitted for the March 2016 and January 2017 BOG meetings. We find this proposal without basis, over-bearing, and impractical. The proposed requirement would not significantly impact the conservation of the animals it seeks to protect. There has been no evidence presented that the meat from small game birds is being wasted or that there is a threat to these species.



Although we applaud the conservation ethic of the proponent, we believe Proposal 17 goes too far. We agree with the BOG decision to require the salvage of leg and thigh meat from larger game birds like cranes, geese, and swans, however, for smaller game birds like grouse, ptarmigan, snipe, and ducks, these parts are extremely small and often essentially inedible. When this small amount of meat is not taken, the carcasses are consumed by other animals. Further, our members are dedicated to preserving the birds that we hunt and consume, and we often harvest this additional meat on our own fruition.

PROPOSAL 91 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Modify the hunting season and bag limits for grouse in Unit 12 as follows:

In Unit 12, a daily bag limit of five grouse per day with a possession limit of ten, except two per day and possession limit of four, for ruffed grouse August 20 - November 10.

Alaska-Yukon NAVHDA Comments: We oppose this proposal. According to ADFG reports, sharptailed grouse lek and ruffed grouse drummer counts are up and there is currently no conservation concern for grouse in Unit 12. The ruffed grouse limit should not be reduced to two per day and four in possession in this part of the state because their numbers appear to be increasing or near their peak in the approximately 10-year cycle. Curtailing the season at November 10 also seems unwarranted as hunting tends to drop off during the cold season in this part of the state. There is little reason to reduce the opportunity for hardy hunters who may be out during the extended winter season when the grouse harvest is likely very low.

PROPOSAL 116 – 5AAC 85.065. Hunting seasons and bag limits for small game. Reduce the bag and possession limit for ruffed grouse in Unit 20D as follows:

Unit 20D, that portion lying west of the east bank of the Johnson River and south of the north bank of the Tanana River: fifteen per day, thirty in possession, provided that not more than five per day and ten in possession may be sharp-tail grouse, **and not more than five per day and ten in possession may be ruffed grouse.** Aug 25 – Mar 31

Alaska-Yukon NAVHDA Comments: We oppose this proposal. If adopted, this proposal means that in this area a bird hunter would only be able to reach the 15 grouse per day limit if not more than five are sharptailed grouse, not more than five are ruffed grouse, and the remainder were spruce grouse (up to 15 spruce grouse if no other grouse species is harvested). At present there is no conservation concern for ruffed grouse or sharptailed grouse because populations are near their peak in the cycle. Additionally, non-consumptive uses such as bird watching the ruffed grouse courtship displays and sharptailed grouse lek are not in danger because the hunting season is not during that time.

While there might be a desire to align ruffed grouse harvest limits with those of sharptailed grouse at five per day, neither limit aligns with recent survey information. Sharptailed grouse numbers in this area may have been low in previous years, but that



situation has reversed making five per day limits unnecessary. Ideally bag limits should be adjusted according to population surveys and densities, however we understand that ADFG may lack the budget or manpower to make annual adjustments. A new brood survey program could help fill information gaps in the future if continued. Alaska-Yukon NAVHDA members have participated in the ADFG brood surveys with well-trained pointing dogs to assist ADFG with grouse and ptarmigan productivity assessments. Several members plan to continue assisting ADFG with those efforts.

In summary, Alaska-Yukon asks the Board to reject the three proposals above and thanks them for the opportunity to comment.

Sincerely,

Scott J Breitsprecher

Scott Breitsprecher
President, Alaska-Yukon NAVHDA



Submitted By
Shawn Osborn
Submitted On
9/28/2016 12:14:58 PM
Affiliation
moose hunter

~~I Moose hunt about 37 mile up the Salcha River. I access my hunting spot from the Yukon Training Area on Army land. I hunt approximately 1 mile north of the Salcha River. I hunt in the area for 10 days or until I get a moose. This year I did not get a moose nor did I see one. I saw no fresh sign.

I have noticed a big increase in air boat activity this year. On September 9 and 10 I literally heard air boats all day, not 1 minute of quiet. The rest of the time I could hear an air boat about 70% of the time. They just go up and down the river looking for moose. To me that's not hunting, it's a waste of fuel, its lazy, creates excessive noise pollution, it's disrespectful to other hunters and animals don't like it. I hunt from a blind and I scrap and call. I cannot hunt effectively with that noise plus. I think it's really rude that these guys run these really loud boats because it ruins my hunting experience. I also heard jet boats and outboards, but these are relatively quiet compared to the airboats.

I have heard similar complaints about airboats from guys hunting the Salchaket Slough and guys up north hunting near the Sagavanirktok River.

In my opinion Air boats need to regulated. They are negatively affecting other hunters, the air boat owners that I have talked to have the attitude "I can do whatever I want, if you don't like it too bad".

Submitted By
Shawn Osborn
Submitted On
10/24/2016 4:39:24 PM
Affiliation

Reduce the non-resident draw hunts to 10% or less.

Allow bison draw hunts for Alaska residents only.

Please stop giving into the commercial guides and the wealthy, take care of Alaskans first!

Big game hunting in this state is not a sport to all people, many of us rely on the meat as a food source.

Thank you for your consideration.

Submitted By
Shawn Osborn
Submitted On
10/24/2016 3:37:27 PM
Affiliation

I am very concerned about the antlerless cow moose hunts in unit 20B. I feel like ADFG needs to reduce the harvest of antlerless moose. I have seen a big drop in the number of moose sightings, especially in the areas that I moose hunt (of course). I have friends that live off of Eielson Farm road, Johnson road, 20 miles north of Fox and in west Fairbanks that have been complaining about the same thing. I know you have heard this same thing from lots of other people.

I have spoken to Biologist Tony Hollis with ADGF recently, he says the population is hanging steady at around 12,000 moose in unit 20B. If that's the case where the heck are all these moose at?

I think the public needs another "moose news" published, we want to know what is really going on.

Please take a good hard look at this issue. Rumors are going around that the state is using Draw hunts to bring in revenue. I hope that's not true. My family relies on Moose (mostly) and Caribou as a food source and I hate to see that go away.

Thank you for your consideration



Submitted By
Steven H Perrins II
Submitted On
1/26/2017 10:09:36 AM
Affiliation

Regarding PROPOSAL 82 - This proposal is extremely unjustified. The main reason more residents are not hunting this area is because of the access and expense to get out there, not because of the guides. Having a drawing for sheep in this one area will effectively put us out of business for guiding sheep. As Alaska's Oldest Hunting Lodge it is simply wrong to do that to us just because some one else wants the sheep instead of us. We are resident hunters ourselves and conservation minded first. More opportunity for the growing demand of sheep hunting is the issue, so maybe we should close sheep hunting all together to let the sheep populations grow for a few years. Or stop subsistence hunting for sheep which ironically just oppened in this area a couple years ago - we should only be harvesting mature rams, not any ram. Guide use areas is a much better solution and should be the focus to give resident hunters a better experience. Also limiting airplane use for sheep hunting will eliminate the guides and hunters that are not conservation minded and fly from area to area hunting out all the sheep. A porposal to change that is now in effect and should be turned down. Guided hunts have historically had a better success rate because they put the time and money in to be successfull, a resident hunter that only spends a weekend in a new area to hunt is always going to be less successful. That is not justification for cutting guided hunt opportunity. Remember guides are mostly all Alaskan residents - so you're not just taking away opportunity from non-residents but from residents who make their life and living on these resources. If there are conservation reasons for doing this, that is another story and several options should be brought to the table. Sheep working grups are working on solutions to this concern but at this time I see this option as a poor solution to a complicated issue.

Submitted By
Steven H Perrins II
Submitted On
1/26/2017 10:21:56 AM
Affiliation

Regarding PROPOSAL #113 - I Support this proposal as is but also suggest an amendment to change it to one ram. With all the sheep issues in our state and the fighting for allocation rights, it is absolutely absured that any one should be able to shoot three rams a year, never mind three of any sheep. If there was plenty of opportunity to go around that would be different, but there is not and people are trying to take away my rights to hunt and guide for sheep while some other resident is allowed to shoot three! How is that fair or right? I was born and raised in Alaska and lived here my whole life? Why is it fair that someone else who was born and raised here gets three of any sheep and I can only shoot a full curl ram? I need the sheep to live on just as much as they do because I make my living off guided hunts to put food on my table and feed my family - sounds like subsistance, so maybe I should get three? There is no reasonable logic behind any answer to that question, especially in the light of all the sheep issues facing our State right now. Again - if there was plenty of sheep, than it wouldn't be an issue, but when there's not - the allocation needs to be fairly split. This is detrimental to the conservation of sheep in our State and very selfish and short sighted.

Submitted By
Steven H Perrins II
Submitted On
1/26/2017 9:22:40 AM
Affiliation

Regarding PROPOSAL 78 - As the Operation Manager for Rainy Pass Lodge - Alaska's Oldest Hunting Lodge, I see a conservation issue with this proposal. We hunt brown bear in unit 19C and just over the line in 16B. From everything we see there is not enough brown bear to warrent the extended season. 16B has been harvested pretty hard with the liberal season and that is overflowing to some of the bears that go back and forth between 16B and 19C. We see far fewer bears in 19C than we do in 16B, so even though all around 19C has a longer season, we believe that is justified. It is true that we could benefit financially from this proposal passing but we hold the conservation aspect to a higher standard than the short term financial gain and that is why we are opposing it. We did not become the oldest hunting lodge by putting finances before conservation. Thanks for your time and please vote down this proposal.



Submitted By
Jeffory K. Pralle
Submitted On
1/24/2017 8:29:12 PM
Affiliation

Phone
907-414-7545

Email
jeff@sheepguide.com

Address
200 W. 34th Ave #694
Anchorage, Alaska 99503

Proposal #82 Require a draw with a limit of 80 Rams in unit 19C. I do NOT support this proposal. I have hunted Sheep in Unit 19C almost every year since 1982 and have not seen or been involved in any conflicts or crowding in the field. I believe Dr. Wayne Heimer of Fairbanks is correct that there is no biological reason to support a draw hunt for non-resident hunters anywhere in the state.



unapologetically FOR ALASKAN RESIDENTS

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

February 1, 2017

Resident Hunters of Alaska (RHAK)

Comments to Alaska Board of Game

Fairbanks Interior/Northeast Arctic Region III Meeting

February 17-25, 2017

Proposals we support: 49, 51, 52, 57, 58, 59, 60, 61, 62, 63, 97, 105, 106, 126

Proposals we oppose: 82, 83, 100

Proposal 49 – 5AAC 92.130 Restrictions to bag limits.

Remove the bag limit restriction for resident relatives accompanying nonresident second degree of kindred.

SUPPORT

RHAK supports Proposal 49 and that it be amended on a Statewide basis per public noticing after Board deliberations and decisions at teleconference meetings in October and November of 2016, and per discussion at the Bethel Region V meeting last month when this same proposal was deliberated as Proposal 19.

This proposal is the result of "**Proposal 51**," submitted by the Alaska Professional Hunters Association (APHA) and passed by the Board of Game at the 2016 Statewide meeting, that changes the intent and language of AS 16.05.407 (the "must-be-guided" law), by placing bag limit restrictions on resident Alaskans who accompany nonresident relatives within 2nd degree of kindred for a must-be-guided species.

Under this new regulation, after a nonresident hunter – accompanied by a resident relative within 2nd degree of kindred (2DK) for a must-be-guided species – successfully hunts and harvests an animal and leaves the state, the resident relative who accompanied that hunter does not have an opportunity to hunt that same species that same regulatory year because s/he has been forced to forfeit their tag and opportunity for that species. In



areas where we have restrictions to opportunity such as bear harvests limited to one-in-four years for both residents and nonresidents, that resident hunter cannot hunt brown bears in that area for four years.

There are no such limitations on licensed resident big game guides who may accompany multiple nonresident clients (for compensation) for those species each year. For example, if a resident guide wishes to hunt spring bear on the peninsula, fill his or her tag, then guide one or more nonresident bear hunters during the fall season (again, for compensation), that is perfectly lawful under this new regulation. Or if a resident guide guides nonresident sheep hunters for the first 20 days of the season, and then wishes to hunt under his resident tag in September, that is perfectly lawful. Another example is if the Board ever introduced earlier seasons for residents for any must-be-guided species, a resident guide could hunt that earlier season, punch his or her tag, then take out multiple clients for that same species during the rest of the season. This is something that many guides have said they would do if the Board ever introduced earlier resident-only seasons for sheep. In all of these examples, the resident Alaskan hunting with a 2nd-degree-of-kindred relative is denied the same privilege as a resident guide.

The Board of Game when passing the original APHA Proposal 51 did not base these new restrictions on resident hunters on any conservation or social concerns, nor on any accurate data from the Department of Fish & Game on actual numbers of nonresidents who hunt with resident relatives for a must-be-guided species.

In fact, new data is out, supplied in December 2016 by the Big Game Commercial Services Board, that lists (anonymous) guided hunt record data going back more than twenty years. It shows, for example, the total number of nonresident guided sheep hunters annually, listing both successful and unsuccessful. This data can be used to approximate the number of unguided nonresident sheep hunters who hunted with a resident relative within 2nd degree of kindred, by tallying the total number of nonresident sheep tags sold each year, and subtracting the nonresident guided sheep hunters.

Our calculations using the data from the BGCSB and the data from ADFG big game tag sales shows that over the last five years, nonresidents hunting with a resident relative for sheep accounted for 16 percent of the total nonresident sheep hunters. Meaning, 84 percent of all nonresident sheep hunters in the last five years were guided.

The audio recordings of the Board of Game deliberations on the guide lobby's proposal in the end came down to which had "more value," a



nonresident guided hunt, or a nonresident unguided hunt with a resident relative. No conservation concerns. No crowding concerns. No biological concerns. No reason at all to restrict resident hunting opportunity.

The Alaska Board of Game is supposed to represent resident hunters and the wildlife resource. They are not supposed to represent the guide lobby. They are not supposed to be making "value" judgments that have nothing to do with any conservation or social concerns.

Proposal 51 – 5AAC 85.045 Hunting seasons and bag limits for moose; and 85.025 Hunting seasons and bag limits for caribou.

Prohibit nonresident hunting of any prey species under intensive management in the Arctic/Western region until population and harvest objectives are met.

SUPPORT with these amendments:

Nonresident hunting shall not be allowed for any prey species in the Interior/Northeast Arctic Region currently or in future under an Intensive Management Predation Control Program [PLAN] until the minimum population or [AND] harvest objectives have been reached.

The intention behind this proposal is that there would not be any nonresident hunting of a moose or caribou population under any active Intensive Management predation control program in Region III until the minimum Intensive Management harvest or population objectives have been reached.

Intensive Management programs are designed to increase moose and/or caribou populations to benefit Alaskans who depend on these ungulates as a food source.

RHAK supported the new hunting license and tag fee increases that go into effect starting in 2017, including the additional Intensive Management fee that both resident and nonresident hunters will pay as part of the cost of their hunting license. We recognize that Intensive Management efforts can benefit all hunters, including nonresident hunters, by providing more hunting opportunities once population and harvest objectives are met, which is why we should all pay for IM efforts. However, the intent of our IM Law and why certain areas undergo a formal predation control plan and program is to **"restore the abundance or productivity of identified big game prey populations as necessary to achieve human consumptive use goals."**



Meaning, Alaskans need to eat, that's the point of Intensive Management programs, and until the population or harvest objectives are met for any prey species, there should be no competition for food from nonresident hunters.

Proposal 52 – 5AAC 92.057 Special provisions for Dall sheep and mountain goat drawing permit hunts; 92.061 Special provisions for brown bear drawing permit hunts; 92.069 Special provisions for moose drawing permit hunts; and 85.025 Hunting seasons and bag limits for caribou.

Establish a 90/10 percent permit allocation for resident and nonresident drawing permit hunts for sheep, moose, caribou, and brown bear.

SUPPORT

This proposal asks regionally what others have asked in the past from the Board at the statewide level; when and where we have restrictive drawing permit hunts for all, residents should have a clear and substantial allocation priority as our state constitution intended.

We ask that residents receive a minimum of 90% of all draw permits for any current or future drawing permit hunt for sheep, moose, caribou or brown bear in Region III, where both residents and nonresidents are restricted. This clearly aligns with the intent of our Founders in Article 8 sections 1-4 of our state constitution:

- Article 8 - Natural Resources
- § 1. Statement of Policy
- It is the policy of the State to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest.
- § 2. General Authority:
 - The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people.
- § 3. Common Use
- Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.



- § 4. Sustained Yield
- Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.

In the winter of 1955-56 when Alaskans were drafting our constitution, they had the knowledge of how decades as a territory had usurped the powers and rights of actual Alaskans. This led to one of the most unique of all state constitutions in terms of natural resources. Our wildlife *is* a natural resource. Our wildlife is supposed to be managed under the sustained yield principle **for the "maximum benefit of its people." Our wildlife is "reserved to the people for common use."**

Resident hunters of Alaska *are* **"the people"** our Founders were referring to. When and where restrictive drawing hunts for all are necessary, resident Alaskans should receive a maximum benefit to any hunting opportunity.

Proposal 62 – 5AAC 85.055 Hunting seasons and bag limits for Dall sheep; and 92.008 Harvest guideline levels.

Establish a ten percent nonresident sheep harvest allocation cap and change all nonresident sheep hunts to draw permit hunts in the Interior/Northeast Arctic Region.

SUPPORT

For the past 10 years, resident hunters have come before the board explaining the unfairness of unlimited nonresident sheep hunting opportunities in various parts of Region III and how it was negatively impacting resident hunting opportunities, success rates, and the sheep resource itself.

In parts of the Interior, nonresident guided sheep hunters harvest 60-80 percent of the total sheep harvest each year, and 40-45 percent statewide. The Board is well aware of the problems associated with this and has told the public over many years that their solution was a "Guide Concession Program" that would limit guides. This allowed the Board to continually stall and decline proposals from residents that sought to limit nonresident guided sheep hunters.

The Guide Concession Program has a 1-million-dollar fiscal note and is effectively Dead-On-Arrival in the legislature. The solution was never about



limiting guides, which is completely outside the Board of Game's purview. The solution was and is to limit nonresident guided sheep hunters.

The Board has before them at this meeting several proposals seeking to limit nonresident sheep hunters via a harvest allocation under 5AAC 92.008, and the allocations vary from a 10 percent nonresident sheep harvest by subunit to a 25 percent nonresident sheep harvest by subunit.

It confounds any rational person when they hear the Board over many years acknowledge that we have a serious problem with the number of nonresident guided sheep hunters, support spending hundreds of thousands of dollars on a scientific sheep survey and a Sheep Working Group, yet continually take no action to address this issue and continue to promote as their solution –which it should be noted is the guide lobby solution as well – something that will likely never happen.

This proposal seeks to codify a clear resident sheep hunting and harvest priority in Region III that is long overdue.

We need a system to regulate nonresident sheep harvests, which is best done by limiting them to draw permits only and capping the allowable harvests, both to protect our sheep resource and to give residents their constitutional hunting priority to that limited resource.

Proposal 63 – 5AAC 92.085 Unlawful methods of taking big game; exceptions.

Remove the restriction on the use of aircraft for spotting Dall sheep in the Interior/Northeast Arctic Region.

SUPPORT

Our support of this proposal is not intended as support for the aerial spotting of individual sheep with intent to harvest. Our support of this proposal is grounded in the rationale that no new regulation should be passed based on subverting the public process of wildlife management that we all hold dear, whether the public agrees with that regulation or not.

That is what happened in passing this new regulation.

The Board of Game by majority vote introduced this as a board-generated proposal at a work session meeting. It had never before been proposed by the public. There was no urgency in considering this issue, and the processes to bring this issue to the board's **attention were more than** sufficient. Those are two of the four criteria for Board-generated proposals the Board overtly contravened when generating the original Proposal 207.



Based on this new regulation, the Big Game Commercial Services Board that oversees guides recently reworded their ethics regulations that govern how aircraft may be used, removing language that specifically mentioned “aerial spotting” and rewording it similar to the already existing federal law governing the harassment of wildlife with aircraft and motorized vehicles.

The Board might consider similar language tweaks.

Proposal 82 –5 AAC 85.055 Hunting seasons and bag limits for Dall sheep.

Change the nonresident sheep season in Unit 19C to a drawing permit hunt with up to 80 permits.

OPPOSE

The sheep hunting issues and problems in Unit 19C outlined by the proponent of this proposal are exactly why it would be a bad idea to codify by regulation that nonresident guided sheep hunters in Unit 19C be continually afforded the same opportunity they have now under a general hunt.

All that would do is allow the same thing to keep on happening, when what needs to happen is a reduction of nonresident sheep hunting opportunity. Nonresident guided sheep hunters outnumber residents in Unit 19C, just as this proposal states, and they harvest the vast majority of the sheep each season. Residents are denied access due to agreements guides have with some transporters, and strips are effectively locked up as well. In every way, Unit 19C is the prime example of a sheep allocation policy by the Board of Game that is completely unfair to resident sheep hunters and resident opportunity, and can lead to resource concerns that cause restrictive drawing hunts for all.

What is happening in Unit 19C is a prime example of why the Board continually sees proposals from residents seeking to limit nonresident sheep hunters. Nonresident sheep hunters definitely need to go on a draw-permit system, but the number of permits should reflect a steep reduction in the numbers of nonresident sheep hunters we have now under a general hunt.

Proposal 83 – 5AAC 85.025 Hunting seasons and bag limits for caribou.

Open a nonresident draw hunt for caribou in Units 18 and 19.

OPPOSE



The Mulchatna Caribou Herd (MCH) is currently under an active Intensive Management predation control program to increase the herd size for human consumptive uses by Alaskans.

The proposer implies that resident Alaskans in the region are unable to harvest sufficient caribou because of more remote herd locations that are inaccessible to residents but would be accessible to guided nonresidents, and a light harvest by those nonresident hunters is acceptable because “most meat” **from that light harvest will be** “left in the communities.”

The Department and Board of Game use population data to determine hunting seasons and bag limits and overall opportunity for both residents and nonresidents. This type of proposal fails to outline that if you take 50 caribou from a herd, no matter if it is right next to a community or in more remote locations, it counts toward the next population estimate, which reflects the kind of hunting opportunity the Board and Department may allow. Basically, every caribou matters, and we hope the public and Board are not swayed by proposals seeking to allow limited nonresident or nonresident guided opportunities for a wildlife resource that is not meeting subsistence needs.

RHAK has a proposal (#51) currently before the Board requesting that no nonresident hunting be allowed for any caribou or moose population currently under an active Intensive Management predation control program until the harvest or population objectives are reached. This proposal is a good example of why we submitted Proposal 51.

In this case, the ANS for the MCH is 2100 – 2400 caribou, which is well above the current harvestable surplus, therefore nonsubsistence uses of the MCH is prohibited by law under AS 16.05.258.

Proposal 97 – 5AAC 92.069 Special provisions for moose drawing permit hunts.

Remove the nonresident guide requirement for moose hunts in the Interior/Northeast Arctic Region, and change the permit allocation.

SUPPORT

The Board of Game has deemed they have the authority to add new species to Alaska’s “must-be-guided” law (AS 16.05.407), adding moose to the statute as a must-be-guided species in certain parts of the interior.

This “must-be-guided” creep – addition of moose to the must-be-guided law – benefits guides at the expense of resident hunters. Requiring nonresidents



to be guided for moose in a portion of Unit 21B within the Nowitna National Wildlife Refuge where a guide has exclusive guiding privileges, then essentially allocating to that individual guide a guaranteed client base, came at the expense of resident opportunity and access.

Here is the background that led to this particular Board of Game decision to require nonresidents be guided for moose on the Upper Nowitna and to limit resident moose hunters to 50% of the permits, quoted from the Department of Fish & Game's Analysis & Recommendations:

"For specific moose drawing permits, the Board of Game allocated portions of the nonresident permits to hunters who would be required to use a guide. Proposals requesting this allocation did so in areas where it had become difficult for a guide's clients to draw a permit. Additionally, proponents of this regulation argued that these changes also meant that more meat from the harvested moose would be better cared for and remain in the local area with community members, guides, or assistant guides."

Let's be clear here. When it was difficult for this guide's clients to draw a permit, the application was completely open to both residents and nonresidents equally. Everyone had a chance to draw, but more residents put in than nonresidents and this negatively affected this guide's client base. Summing up that argument, "I as a guide want more guaranteed clients!"

This other rationale the Department mentions, the notion that guides take better care of meat than resident moose hunters, is *completely false and offensive*, and the premise that more meat would remain in the local area with guides and assistant guides if we allow nonresident guided hunters half of the permit allocation is just a reallocation to "locals" over "non-locals" that we too often see in the federal arena. Won't those local guides and assistant guides still hunt for their own moose if they didn't have a guaranteed subsidy and nonresident client base? And isn't what is going on essentially proxy hunting by nonresident guided hunters who have no intention of bringing the meat home with them? Yet our state laws say that if one is proxy hunting, he can't keep the antlers, can't keep the "trophy value."

The DM 809/810/811 draw permit hunt allocates 10 permits to residents (DM 810), 7 permits to nonresident must-be-guided (DM 811), and 3 permits to nonresident unguided (DM 809). This hunt allows a moose hunter to keep the antlers without having to destroy the "trophy value."

In 2016, 59 residents applied for the 10 available DM 810 permits, with a 17% draw percentage. 10 nonresidents applied for the 7 DM 811 must-be-guided permits with a 70% chance of drawing. 14 nonresidents applied for the 3 DM 809 permits with a 21% chance of drawing.



Some argue that this is a “trophy hunt” and thus nonresident hunters should have an equal allocation with resident hunters. It doesn’t matter how a hunt is defined, no moose hunt anywhere in the state where both residents and nonresidents are restricted should allow a permit allocation to nonresidents higher than 10%.

Proposal 105 – 5AAC 85.025 Hunting seasons and bag limits for caribou.

Change the nonresident bag limit for caribou and resident cow season in Unit 26B

SUPPORT

Between May of 2016, when RHAK submitted this proposal, and January of 2017, the Alaska Department of Fish & Game published new data showing the Central Arctic Caribou herd had substantially declined to 22,630 animals, which is below the Intensive Management population objective of 28,000 – 32,000. Due to this decline, the Department has amended our proposal for even more restrictions than we originally proposed due to conservation concerns with the CAH.

From the Department’s Analysis & Recommendations:

“When this proposal was submitted, the Central Arctic caribou herd (CAH) was estimated at 50,753 caribou (range: 40,924–60,582) in 2013 and the herd was determined to be either stable or slightly declining with an annual harvest rate of 2–4%. However, the July 2016 photocensus resulted in a population estimate of 22,630 caribou (range: 20,074–25,186), indicating a substantial decline in the herd.

Harvest by Nonresidents: During RY10–RY15, nonresident harvest comprised an average of 31% of the harvest (293 caribou). This composition changed over time from 22% during RY10–RY12 to 41% during RY13–RY15. The average number of hunters was also higher during RY13–RY15 (429 nonresident hunters) compared to RY10–RY12 (315 nonresident hunters). Approximately 100 more nonresident hunters were in field during RY13–RY15 compared to RY10–RY12.

The increase in nonresident hunters was likely due to decreased opportunities for nonresidents in the Western Arctic and Teshekpuk caribou herds. Most nonresident harvest occurs in August (77%) with 18% occurring in September and the remaining 5% throughout the year.”

The Department recommends the following amendments to our proposal:

Unit 26B, that portion north of 69°30’ N. Lat. and west of the east bank of the Kuparuk River to a point at 70°10’ N. Lat., 149°04’ W. Long., then west about 22 miles to 70°10’ N. Lat., 149°56’ W. Long., then following the east bank of the Kalubik River to the Arctic Ocean):



Resident hunters: 5 caribou total, July 1–June 30, however, no more than 3 cows may be taken (projected harvest of 60 bulls, 15 cows).

Nonresident hunters: One bull by harvest ticket, August 25–September 7 **(projected harvest of ≤5 bulls).**

Unit 26B Remainder:

Resident hunters: 2 caribou by harvest ticket, August 1- April 30; however, cow caribou may only be taken November 1- April 30 (projected harvest of 320 bulls, 50 cows)

Nonresident hunters: One bull by harvest ticket, August 25 -September 7 (projected harvest of 130 bulls)

With the CAH now below the IM population objective, and the Department saying we need to reduce harvest by 200-300 caribou, we believe there should be no nonresident hunting allowed at this time.

We recommend keeping the modified resident season and bag limits above, but having no open season for nonresident hunters until the minimum IM population objective is reached.

Proposal 106 – 5AAC 85.020 Hunting seasons and bag limits for brown bear

Add a new resident only registration permit hunt for grizzly bear within the Dalton Highway Corridor Management Area (DHCMA)

Unit 26B Resident only

RB XXX – one bear every regulatory year by permit within the DHCMA by bow and arrow only, Aug 10 -Aug 24

SUPPORT

The current grizzly bear season on the north slope in Unit 26B under the RB 988 registration permit opens on August 25th for residents. We would like to see more grizzly bear opportunity for bowhunters who hunt caribou within the DHCMA earlier in August. The likely harvest rates would be extremely low and we don't believe those harvests would impact the RB 988 resident opportunities or the DB 987 nonresident opportunities later in the season.

Alternatively, the Board could create a resident-only draw permit with limited allocation for an earlier archery-only season within the DHCMA.

Thank you for the opportunity to comment.

Resident Hunters of Alaska – info@residenthuntersofalaska.org



Submitted By
Chase Sanderson
Submitted On
12/2/2016 1:45:47 PM
Affiliation

Phone
9074146820

Email
silkknnox@yahoo.com

Address
452 s knik goose bay Rd #104
Wasilla, Alaska 99654

I am curious as to why Alaska fish and game allows hunters to harass and Chase caribou with snow machines. I came from a hunt that was the most ridiculous thing I've ever experienced in all of my life and I've been hunting since childhood. Hundreds of snowmobiles chasing Caribou around jumping up and running them down. That is not hunting and should not be legal. I hiked 5 miles on foot after a band of caribou crawled on my belly with in 175 yards of a group and before I could take a shot I had a snowmobiler come flying up the mountain chase them down and shoot them from their snowmobile. This is insane and needs to be addressed before somebody is hurt or killed and it is especially unfair to an animal. If you can put in the work to get an animal you don't deserve one