



Submitted By  
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Submitted On  
12/20/2018 5:50:12 PM  
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I oppose proposal 23 that would open up goat hunting on Juneau ridges to archers. Goat hunters deserve to have opportunity to hunt, but not where they may impact local goat populations as ADF&G biologists fear could happen with this proposal.

The ridges above Juneau have been closed for a long time and yet the population of goats has not grown. This is likely related to factors that aren't human-caused, but given these natural pressures it is wise to be cautious about expanding the potential take of goats.

In addition the Juneau ridges are extensively used by hikers and wildlife watchers in the areas proposed for the expanded archery hunt. The Mount Bullard Closure, for example, has existed since 1962 and serves to maximize opportunities for viewing goats from the Visitor Center and lake. Other ridges have infrequent or variable populations of goats that are occasionally sighted by hikers, each sighting is considered a unique and rare event, not at all dependable. We should manage this resource for increased goats, not reductions.

Thanks

John Neary



Submitted By  
Nicholas Orr  
Submitted On  
12/26/2018 3:49:56 PM  
Affiliation

I am writing in support of proposal 3. I realize that there are going to be some people that claim the ribs to be their favorite part of the deer. However there are several reasons I believe this proposal should become part of regulation. One, there is minimal meat on the ribs, so making salvage optional wouldn't in much waste. Two, a lot of hunters, especially in the ABC islands, are using large caliber rifles due to brown bear presence, resulting in baseball-sized exit wounds. This means a pretty significant portion of the rib meat is already either missing or contaminated with lead / bone fragments. Three, there is a growing body of evidence indicating that game shot with lead bullets – the most common kind – often has elevated levels of lead in the flesh surrounding the bullet wound. X-rays of harvested game animals have shown that area immediately surrounding where the animal was shot have the highest levels of lead. ADF&G states that the best shot placement on big game is through the heart-lung area, which means hunters using lead bullets are being forced to salvage meat containing significant amounts of lead. A simple internet search of 'lead in game meat' will show many pictures and provide more information on this issue. Four, hunters in the ABC island area have to deal with brown bears and ADF&G advises hunters to "be alert" while field dressing deer. If only one hunter can avoid a bear encounter by not having to salvage the minimal meat on the ribs, it's worth it.

I would like to add that I wrote in the proposal that there is between 2-5lbs of meat on deer ribs total. This is incorrect; I shot a large mature buck in the alpine this year and I was able salvage ~1lb of 'meat' – a large portion of what was salvaged includes gristle, fat and connective tissue. I know this because I weighed the salvaged meat on a scale once I left the field. The heart, the diaphragm (the part of the animal separating the chest cavity from the abdominal cavity), and the flanks (the part of the animal supporting the stomach/intestines) have a comparative amount of meat, yet they are not required to be harvested.

To summarize: (1) there isn't much meat on the ribs and what meat there is often damaged by high caliber rifle bullets; (2) shooting deer in the ribs – as advised by ADF&G – with commonly used lead bullets spreads lead fragments throughout the ribcage; and (3) not having to salvage the minimal meat from the ribs will lessen the chance of having an unpleasant bear encounter.

Submitted By  
Nicholas Orr  
Submitted On  
12/27/2018 9:49:40 AM  
Affiliation

I am writing to support the passage of proposal 22. Limiting the take of wolves on Douglas Island for a population that freely moves back and forth between the mainland and the island has the effect of creating a wildlife preserve for wolves. Wildlife preserves generally occur when there is either a biological concern about a population or a significant public interest in viewing wildlife that are easily observable. Wolves on Douglas Island meet neither of these criteria; the ADF&G has stated no concern about the wolf population in Unit 1C and wolves in southeast Alaska are not an easily observable animal due to their reclusive nature and dense forest. I would like to point out that Douglas Island is heavily utilized by Juneau deer hunters as it is the only area with a significant deer population that doesn't require a boat to access. Maintaining a wildlife preserve/sanctuary for wolves on Douglas Island forces hunters without boats (i.e. generally lower income hunters) to suffer the consequences of such a regulation (a reduced deer population). Finally, Alaska has plenty of wildlife preserves / parks – we don't need to go around creating more unnecessarily.

Submitted By  
Nicholas Orr  
Submitted On  
12/27/2018 12:06:17 PM  
Affiliation

I am writing to comment in support of Proposal 18. Increasing the bag limit for deer from 4 to 6 deer would essentially increase opportunities for Juneau hunters in the area of Unit 4 around Juneau. Changing the bag limit would likely not impact other communities in Southeast Alaska due to their relatively large distances from Juneau, especially when considering marine weather and the short days in November / December when most of the deer hunting effort takes place. As I stated in the proposal, many Juneau hunters are limited to the area between Pt Arden and Pt Retreat due to consistent unfavorable marine weather in these areas. Finally, I would like to point out that ADF&G stated in their latest Species Management Report that "the division should assist the 2 regulatory entities [Federal Subsistence Board & Alaska Board of Game] in standardizing deer hunting regulations." This proposal would standardize deer regulations in Unit 4.



Submitted By  
Nicholas Orr  
Submitted On  
12/27/2018 1:41:31 PM  
Affiliation

I am writing in support of Proposal 4. I personally have never shot a deer on the beach, but I object to Southeast Alaska having different regulations for no discernable reason. Any issues that might pertain from shooting from a boat in Southeast Alaska also pertain to all the other units in Alaska. Southeast should be no exception. I participated in the Juneau Advisory Council discussion on this issue and no one could remember why or when this regulation was passed in the first place. I think some people are against the proposal simply because it is different, from their perspective, from what they are used to. I would add that hunters often complain about the complex nature of hunting regulations. This proposal would be a step towards simplifying the regulations and creating uniformity throughout the state.

Submitted By  
Nicholas Orr  
Submitted On  
12/27/2018 1:55:36 PM  
Affiliation

I am writing to comment against Proposal 13. There is currently no regulation in the remainder of the state requiring ID tags for traps and snares and there is no reason to implement this in southeast only.

Submitted By  
Nicholas Orr  
Submitted On  
12/27/2018 2:00:26 PM  
Affiliation

I am writing to comment against Proposal 14. There is currently no regulation in the remainder of the state requiring ID signs for traps and snares and there is no reason to implement this in southeast only. Furthermore, there is a small but active percentage of the public that seeks to actively disrupt trapping and signage would serve as an invitation for those people to steal traps and otherwise interfere with lawful trapping.

Submitted By  
Nicholas Orr  
Submitted On  
12/27/2018 2:10:42 PM  
Affiliation

I am writing in support of the version of proposal 20 supported by the Juneau Advisory Committee (4 deer, bucks only). The proposal as originally written – 4 deer, only one of which may be a doe – is essentially unenforceable. A hunter would need to be contacted multiple times by AWT in order for them to determine whether a hunter had shot more than one doe. Given the impact that wolves have had on the Douglas Island deer population, this is a necessary step towards rebuilding the population.



Submitted By  
Jon Pond  
Submitted On  
12/24/2018 8:50:28 AM  
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***December 24 ,2018***

**Open letter to The Board of Game for the January 11-15th scheduled Meeting:**

My name is Jon Pond. I have lived and worked in Juneau and throughout Alaska for the past thirty-five years. I have enjoyed duck and deer hunting in Southeast Alaska. I have worked as a part time river/fishing guide in Alaska floating many of the rivers in Southwest Alaska and The Brooks Range.

I Appreciate the Board having its scheduled meeting in Southeast Alaska and the opportunity to give my personal input on three key proposals in Unit 1-C that will directly impact our area.

**Proposal #22:**

I oppose proposal # 22 because wolves are an integral part of our archipelago including Douglas. They have shown no negative impact on the local deer or domestic animal populations and provide the balance needed to maintain a distribution of healthy animals .To have an opportunity to see or hear a wolf on Douglas or anywhere, is a true Alaskan experience enjoyed my many. To trap out (again) the small existing population of the Douglas wolves is to eliminate the sense of true wilderness Douglas can provide for all users. Plus, it's good animal conservation.

**Proposal #23:**

I oppose proposal #23 because I remember when there were no mountain goats on our ridges around Juneau. They were hunted out years ago. I remember the small local effort funded both in energy and personal monies to reintroduce the goats to the ridges where they naturally belonged for all to see again. The herd has done well over the past 20 years. To walk Perseverance trail or hike the ridges or even look up from your porch or office window and see goats naturally positioned high on the ridges is a special opportunity especially given it is so close to town. Just the tourists who appreciate the splendor make many times over the initial value. The area is better used for viewing and non-consumptive users. Hunting Goats is offered in numerous and more remote drainages accessed on the road system.

**Proposal #28:**

I oppose baiting Black Bears in the Juneau area for hunting. It is just not smart. The last thing we want to do is to habituate our local black bears to human food. I have had a bear in my kitchen. I opened my front door this year greeted by a black bear.

One was eating on my deck one evening this year from the bird feeder for lack of berries and salmon. We have a chronic bear garbage problem in Juneau and the community works hard at trying to keep them on natural foods and not our garbage. Once they are habituated to garbage, their chances of being destroyed are greater and to be hunted with bait only compounds the issue and is frankly, poor hunting ethics in this part Alaska.

Jon Pond  
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Submitted By  
Anne Post  
Submitted On  
12/17/2018 2:27:24 PM  
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I oppose Proposal 23 which would open more areas around Juneau to goat hunting. Anecdotal information provided by one hunter that there are enough goats to expand the hunt is not scientifically based nor statistically valid for making this decision. In addition, the goats in the proposed expanded area provide wonderful viewing opportunities for thousands of visitors and locals at the Mendenhall Visitor Center, Mendenhall Recreation Area and from many trails around Juneau. Their experience is enhanced by viewing goats on those surrounding peaks all year round. The current regulations already provide good opportunity for goat hunters.

The author of Proposal 23 also claims that hunters get confused about the hunt boundaries and uses that as a reason to expand the hunt area. ADF&G Proposal 24 clarifies the boundaries for the current goat hunt in Unit 1C and should help alleviate that concern without expanding the area open to goat hunting.

Thank you for the opportunity to comment.

Submitted By  
Anne Post  
Submitted On  
12/28/2018 9:25:38 AM  
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**PROPOSAL 14 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.**

I support this proposal.

I am not opposed to trapping but I hike frequently with dogs on and off trails in the Juneau area and would greatly appreciate signage that tells me there are traps in the area. Thank you.

Submitted By  
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12/28/2018 9:14:29 AM  
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I support **PROPOSAL 13 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions**, which would Require identification tags for traps and snares in Units 1–5 .

I am an avid Juneau hiker and would feel much safer if these requirements were enacted.

Thank you for the opportunity to comment. - Anne Post



Submitted By  
Kimberly Raum-Suryan  
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12/26/2018 11:33:05 PM  
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### **PROPOSAL 13**

**5 AAC 92.095.** Unlawful methods of taking furbearers; exceptions.

**SUPPORT** - Require identification tags for traps and snares in Units 1–5.

**I support the recommendation to reinstate trap tag requirements in Unit 1-5** whereby trappers are prohibited from using a trap or snare unless the trap or snare has been individually marked with a permanent metal tag upon which is stamped or permanently etched with a trapper's identification number. This is just good common sense. Crabbers and fishermen have to mark their gear with identification numbers when the gear is left alone and there is no reason that traps or snares left unaccompanied should be any different. By marking traps and snares, the trapper can be contacted if a non-target animal is caught in the trap or snare. Moreover, if the traps or snares are left out when trapping season is closed, troopers can contact the trappers to remove their traps. By being good stewards of Alaska and trapping legally and ethically, all users of public lands can be assured that Alaska is a leader in handling the rights of all Alaskans. Thank you.



Submitted By  
Maryann Ray  
Submitted On  
12/17/2018 7:46:06 PM  
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Re: PROPOSAL 13 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

I'm writing to request the reinstatement of the requirement for traps and snares carry a permanent mark identifying their owners. Our wilderness areas are shared by hunters, trappers, hikers, pets, and children. We've had situations where pets and other creatures have been unintentionally trapped, there have been traps misplaced in areas where pets and children play, and working snares have been found out of season.

There is no way to hold people accountable for their traps and snares if they aren't marked and accountability is required to ensure seasonal and other restrictions are properly maintained. Please reinstate the thr requirement for permanent identificatio to be placed on all traps and snares.

Thank you,  
Maryann Ray



unapologetically **FOR ALASKAN RESIDENTS**

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436  
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December 27, 2018

Comments to Alaska Board of Game  
Region I Southeast Meeting – Petersburg  
January 11-15, 2019

Proposals we support: 8, 9, 31, 40, 49 & 50 (as amended)

Proposals we oppose: 37

Proposal 8 – 5AAC 85.015 Hunting seasons and bag limits for black bear

SUPPORT

This is a RHAK proposal, based on our firm belief that the legislature never intended for the **Board of Game to create new “must be guided” (MBG) species for nonresident U.S. citizens** beyond what is required by AS 16.05.407. **The Board claims that it hasn’t created or added to the MBG species outlined in statute, rather it has created new “must-be-guided species hunts” in specific areas of the state.**

**AS 16.05.407 is Alaska’s unique and one-of-a-kind “must be guided” law** among all the other 50 states that makes it unlawful for a nonresident U.S. citizen to hunt grizzly/brown bear, Dall sheep, or mountain goat, unless that person hires a licensed big game guide or hunts with a resident relative within 2<sup>nd</sup> degree of kindred. Note that the statute does not give a preference to the nonresident guided hunter over the nonresident hunting with a resident relative, or vice-versa; both are equal under the law. The rationale for the law is that brown bears are dangerous, and the terrain sheep and goats inhabit is dangerous, and **field judging of legal animals is difficult, thus someone who doesn’t live in the state should be required to hunt with a guide or resident relative.**

When there are conservation concerns for any big game population – as there was with black bears in Units 1-3 in 2010 – and nonresidents are taking the majority of the harvest, the solution is to limit all nonresidents equally to draw only hunts, not to create a new MBG species for that particular hunt and give a preference to guided nonresident hunters. That is a slippery slope that always seems to negatively affect resident hunters.

What the board did in 2010 was to use ADFG data that showed that most of the nonresident black bear **harvest was from “unguided” hunters, but the data did not say anything about the 2DK hunters.** The 2DK hunters who hunted with a resident relative should be considered **“guided.”** The majority of the black bear harvest went to those nonresidents hunting without a guide or a resident relative.

Why then does the board discriminate against the nonresident hunting with a resident relative when they impose a new must-be-guided species hunt? Again, under AS 16.05.407,



the nonresident guided hunter and the nonresident hunting with a resident relative within 2<sup>nd</sup> degree of kindred are equal. **They are both technically "guided" hunters.** Why does the board choose to negatively affect residents who want the same opportunity to hunt with their nonresident relatives, by giving a preference to only the **"guided" nonresident** hunters hunting with a licensed guide?

At the very least, if the board does not approve our proposal, and certain black bear hunts in SE Alaska units **remain "must-be-guided," we ask to consider allowing nonresidents** hunting with a resident relative within 2<sup>nd</sup> **degree of kindred to be part of that "guided" pool** of hunters and be given the same general hunt opportunity outside the draw permit requirement.

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Proposal 9 – 5AAC 85.015 Hunting seasons and bag limits for black bear

SUPPORT

**We support removing the "must-be-guided" (MBG) requirement for nonresident black bear** hunters in units 1B, 1C, and 1D, and going to general season hunts for all nonresidents, however we would like to see the MBG requirement removed for the rest of Units 1-3. Alternatively, see our comments on Proposal 8, to recognize that a nonresident hunting with a resident relative within 2<sup>nd</sup> **degree of kindred also be recognized as a "guided" hunter.**

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Proposal 31 – 5AAC 92.550 (1)(F) Areas closed to trapping

SUPPORT

The original intent of the setbacks which prohibited trapping within ¼ mile of these trail areas around Juneau was concern for domestic dogs getting caught in traps. Subsequently **there was allowance to set traps with a jaw spread of 5"** or less as long as they were 50 yards off the trail and elevated at least five feet above the ground/snow.

Since the trapping restrictions took place, there has been an increase in nuisance beavers, which trappers have not been allowed to trap within ¼ mile of the trail. This proposal seeks to allow trapping for beaver and other water species as long as the trap is fully submerged and 50 yards from the trail.

Makes sense, protects domestic pets from getting caught, allows more harvest of nuisance beavers and more opportunity for local trappers.

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Proposal 37 – 5AAC 92.108 Identified big game prey populations and objectives

OPPOSE

The Department at this time has not submitted its Analysis & Recommendations on their Proposal 37, which makes it difficult to provide more informed comments. However, based on the proposal, we find it odd that if the Department is concerned about carrying capacity for deer in Unit 1A, and that the Intensive Management harvest objectives of 700 deer will not be reached in future, why not also recommend to lower the population objective, which is currently 15,000 deer?

Both the population and harvest objectives of any identified big game prey population under



IM law should reflect current trends, carrying capacity etc., so we know when to conduct mandatory IM predator control efforts on these identified populations.

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Proposal 40 – 5AAC 85.030 Hunting seasons and bag limits for deer

SUPPORT

We agree that nonresident bag limits beyond two deer are not in the best interests of resident deer hunters or the deer population.

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Proposal 49 and 50 – 5AAC 85.015 Hunting seasons and bag limits for black bear

SUPPORT as amended

The Department is asking to increase the number of black bear draw-only permits to **nonresidents hunting "without a guide"** for Kuiu and Kupreanof Islands. (See our comments on proposals 8 & 9.) There is no reason to incorporate nonresident hunters who hunt with a resident relative within 2<sup>nd</sup> **degree of kindred as "unguided" hunters under the current permit system. Why not just change the definition of "guided" to include the nonresident hunters who hunt with a resident relative within 2<sup>nd</sup> degree of kindred.** That would allow the same unlimited opportunity for that class of nonresident hunter, and allow residents the opportunity to go hunt black bears with their nonresident relatives without having to go through a draw permit process. The 2DK nonresident component should never have been restricted to draw-only hunts as it is the truly unguided nonresident black bear hunters who were taking the majority of the harvest.

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Thank you to Board of Game members for your service, and Board Support and Agency staff!

Resident Hunters of Alaska (RHAK)  
[www.residenthuntersofalaska.org](http://www.residenthuntersofalaska.org)



Submitted By  
Jesse Ross  
Submitted On  
12/9/2018 11:13:27 PM  
Affiliation  
ATA , local trapper, sportsman

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Proposal 8 I fully support this. i feel as though the guide industry has sneakily tried to hijack the black bear hunts in southeast for non residents. this is an allocation issue between resident and non residents. I love black bear hunting and take 2 most years.. the RHO of AK are spot on when they say, " the legislature never intended the BOG to create a new must be guided species beyond brown bear, sheep and mountain goat without legislative approval" this sets a bad precedence if not dealt with.

Proposal 11 I support this wholeheartedly as a trapper due to late springs, such as Spring 2018 when ice on most beaver ponds didnt melt til around May 1. Hides are still prime, Beaver arent a species of concern

Proposal 13 I am against this proposal, I have had gear stolen with my trap tag on it and it ended up in a closed area and i had to prove to troopers my gear was stolen. this will be abused by anti trappers and doesnt help in enforcement, unless there is a venue for trappers to officially report stolen gear to.

Proposal 14 As a trapper I am opposed to this...might as well put a giant billboard at your traps or snares and advertise, could be unconstitutional, creates litter in the wild, Juneau douglas AC opposed this as well. In Jan 2018 I had 3 trap signs made from recycled political signs stating "active trapping area" " traps ahead", stolen from my trapline in the Juneau area...proving no good can come of this.

Proposal 19 I support this wholeheartedly, needs troopers to sting some people. its a huge safety issue, would be sad to see a hunter or miner killed if nothing is done

Proposal 20 I oppose this, this is a management debacle caused by the Douglas island management plan and the increase of wolves, this wont be needed if the wolves are managed like they are in the rest of the state...see Proposal 22

Proposal 22 I support this...why is the Dept managing wolves in small localized areas?? Need to manage them like the rest of the state does. the Douglas management plan takes away allocation from trappers and hunters and needs to be stricken from regulation.

Proposal 23 I support this as amended by the local AC. Goats arent just for viewing and I am appalled that the sportsman played an integral part in getting them transplanted to the immediate local Juneau area in the 80s yet cannot hunt them.

Proposal 28 I Fully support, Dept states they wont issue a permit for baiting, where is this in regulation, statute??? this could be a great tool for ADFG to lawfully remove problem bears from the Juneau area...Not enough local area bears are being harvested, so they come into town, and get shot by LEOs and placed in dump. Please Allow hunters to do their part. please treat 1c like the rest of the state! This is constitutionally mandated!!!!

Proposal 30 I support as amended...give kids the First Saturday of opening season....

Proposal 31 I support, Local trappers organization can help with education of new trappers to see that problems dont arise. Juneau has THE STRICTEST trapping regulations and setbacks in the state. Lotsa beaver ponds could be trapped, but arent due to this regulation, this would give trappers a little more room. Local AC supports as well.

proposal 32 I oppose this very strongly. Locals on city council are against trapping. This aims to oust trappers, all user groups need to share the trails in this small area. Unconstitutional allocation issue, do elevated sets, but kicking out a user group isnt playing fair

Thank you for your time and efforts in caring for Alaskas game resources!!

Regards,

Jesse Ross



Submitted By  
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Submitted On  
12/9/2018 10:07:39 PM  
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Proposal 22 Comment in Support

I fully support this proposal. I authored this proposal because as a sportsman I care about healthy game populations of both deer and wolves. This outdated management Plan was created in 2002, ( it is 16 years old) after 2 trappers caught 7 wolves on the backside of Douglas island. The media learned about this and concerned citizens went to the Dept. and they ultimately wanted the entire island to be a refuge free from hunters and trappers. The Douglas island management area plan resulted and was a compromise by the dept to all parties. In the last 16 years the wolf population on Douglas and the Juneau area has increased and the deer population has decreased. I find it frustrating as a trapper to see the Dept set an arbitrary number of allowable animals to be harvested (allocation of wolves) in an area where they have zero (0) scientific or biological data estimating the local wolf population., yet rely on anecdotal info from word of mouth and social media sites and general science models to estimate how many wolves are on the island. Yet sightings have increased, deer hunter success has been dismal and the Dept. continues to limit the taking of apex predator in this area. ADFGs deer pellet surveys in the past years showed that when wolves were trapped , the deer population increased. I respect many of the ADFG staff and am friends with several of them, they have a tough job to manage Alaska's resources. I am not against any of them, just this 16 year old poor management plan for Douglas's wildlife. In the 2017, 2018 trapping season after a recent fresh snowfall i found fresh wolf tracks....on the north end of Douglas i found a pack of atleast 7 wolves traveling north, at the south end i counted 6 distinct sets of wolf tracks heading south. Biologists say that the size of the island can only support one pack of wolves. I must disagree with this model, as the wolves can easily travel between the mainland at low tide or swim across the small channel ways. Furthermore , if this Plan is left in place, i feel it would be a travesty to allow Alaskas wolves to be managed in such a way as to only allocate so many animals to be taken in a small area for such a wide ranging predator. I love wolves, they have a place in nature and so do I. I also realize that as a trapper I play an important role in predator management and see wolves for what they are....an apex predator. As you know, wolves are survivors and very tough to trap, the Douglas island management needs to be stricken from regulation so that trappers can do their part in the circle of life, The Juneau Douglas AC supported this proposal as well. Thank you for standing tall for Alaska's Game resources.

Submitted By  
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Submitted On  
12/27/2018 10:51:08 AM  
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Proposal 22 i support this proposal because it's manages Wildlife for all user groups. Keeping it the way that it was it excludes Trappers and hunters and the deer population has obviously suffered on Douglas because the Wolves know that there are a lot of deer there. Why are we micromanaging an island without data backing up how many wolves are actually there. Furthermore the biologist decided to alter the quota system from five walls to three wolves. Their reasoning was that it was a board of game here and they didn't want to bring unnecessary attention to the issue. This is just plain garbage. That is an unconstitutional move because it puts Trappers and Hunters who would like to harvest a wall and there are plenty of them on the island out of the equation. Adfsd Mission states to manage all resources to maximum sustainable yield for all user groups not just a certain group such as Wildlife viewers.



**From:** Frank Rue  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Southeast Alaska BOG Proposals  
**Date:** Tuesday, December 25, 2018 5:53:33 AM

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My name is Frank Rue, my residence is 7083 Hendrickson Rd, Juneau Alaska 99801.

I have lived and hunted in Alaska since 1977. I am an avid deer hunter and have harvested many deer from Douglas Island, Admiralty Island and Chichigof Island over the years.

I have comments on three of the proposals being considered at the Petersburg BOG meeting scheduled for January 2019.

**PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES.**

**OPPOSE** – I hunt deer on Douglas Island. I have enjoyed seeing wolf sign while hiking and skiing on Douglas. I like to know there are wolves on Douglas. I do not support eliminating the Douglas Island Management Area in GMU 1-C and removing the annual 3 wolf harvest quota for the island. I feel that reasonable numbers of wolves have a place on Douglas island, and that the public is well served to know that the island is wild, has wolves and that there is a chance that wolves can be seen and enjoyed by all who venture out into the wilderness. Please keep the 3 wolf harvest quota in place on Douglas Island. It does not need to be changed.

**PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS**

**OPPOSE** – I strongly oppose additional archery hunting of mountain goats on Mount Juneau, Mount Roberts, and the entire Juneau area from Mendenhall river/glacier to Taku river/glacier. My family, and many Juneau residents and visitors, hike the ridges in the new proposed hunting areas. One of our greatest pleasures is to see mountain goats. We are very fortunate to be able to see goats along the Juneau road and trail system. Unlike Alaska's more remote goat areas, our local goats see summer hikers in close proximity and do not run away. The Mount Juneau area goat population is better used for wildlife viewing and non-consumptive enjoyment of goats without additional



**pressure from hunting. The value of goats for viewing for thousands of local Alaskans and summer visitors is of greater value than the opportunity for a few people to take a goat. There are other hunting areas around Juneau that are more remote that can accommodate goat hunters. Please do not change or increase the current mountain goat archery areas in Juneau.**

#### **PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU**

**OPPOSE: I strongly oppose allowing in the Juneau area (1C) any black bear baiting at bait stations. Juneau has bears in all its neighborhoods and, in the past, Juneau has had a very serious problem with bears getting into garbage. Juneau has a strong garbage ordinance with serious fines for those who do not protect their garbage from bears. This ordinance has helped reduce the number of garbage bears and conflicts between bears and humans in Juneau. Allowing bear baiting will undermine Juneau's efforts and cause more bears to become accustomed to human food. Bears conditioned to human food will lead to more bear-human conflicts. Luring bears to bait stations with human food seems like a bad policy in Juneau. I oppose this change.**

Thank you for considering my comments.

Sincerely,

Frank Rue

7083 Hendrickson Rd

Juneau, Alaska 99801

[frankrue44@gmail.com](mailto:frankrue44@gmail.com)



**From:** Sally Rue  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Comments for Southeast AK Board of Game Meeting Jan. 11-15, 2019  
**Date:** Wednesday, December 26, 2018 3:03:25 PM

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Dear Board of Game Members,

I am a long-time Alaska resident who has held a sport hunting license since 1977. I have the following comments on proposals that you will address at your upcoming January, 2019 Petersburg meeting.

Proposal #22: REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES

### **Oppose**

I have hunted on Douglas Island, and I appreciate that people value healthy populations of deer there. However, I also prize the presence of wolves and the occasional opportunity to run across wolves or wolf sign. I remember the thrill of fresh wolf tracks when skiing in the Hilda Creek drainage a couple years ago. That is a memory that I will hold for many years. The current regulations allow for some take of wolves, and still provide adequate deer hunting opportunities in my view. Please do not adopt this proposal.

Proposal #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT. JUNEAU AND NEARBY AREAS

### **Oppose**

I remember when you could not see any goats on Mt. Juneau, Mt. Roberts, and other nearby ridges. I love that today I can hike up the valleys or on the ridges and have a decent shot at viewing these magnificent animals because a small group was re-introduced by ADF&G with the support of local volunteers. I actually feel a little proprietary when I see goats there, having made a monetary donation to the re-introduction effort back then. I know how much my family, friends, and visitors to Juneau value the opportunity to see wild goats so close to town. I do not believe that allowing archery hunting in this area makes any sense. It might benefit a few bow hunters, but at the expense of thousands of residents and visitors to our region. The value of these goats to non-consumptive users far outweighs the potential value to a few hunters. Even if the population stayed at healthy levels, the goats would disappear from easy viewing. Tourism is a huge benefit to Juneau and Alaska, and viewing wildlife is one of the biggest draws for tourists and their dollars.

I strongly oppose this proposal. Allowing hunting of goats on Mt. Juneau and nearby areas would negatively impact thousands of residents and visitors. There is no valid reason to change the current status.

Proposal #28: ALLOW BEAR BAITING IN JUNEAU

### **Oppose**

I strongly oppose opening the Juneau area (GMU 1C ) to black bear baiting at bait stations. Juneau has a longstanding garbage bear problem, and allowing use of human food to bait bears



would only exacerbate the problem. Our community, and we as residents, have gone to great lengths to address it. I remember a year when ADF&G and the Juneau Police Department had to destroy 14 bears because they had been habituated to garbage. That was distressing and felt like a failure of responsibility on the part of Juneauites. The City Assembly enacted ordinances to alleviate the problem, and they have been enforced over the years and have led to a substantial reduction in the problem. Allowing a relatively few people who might wish to 'hunt' using bait stations in Juneau's densely populated area would damage our efforts as a community to avoid habituating bears to human foods and increase the danger of bear-human conflicts.

In addition, as a hunter, I find using baiting stations to be a violation of fair chase ethics.

Thank you for considering my comments.

Sincerely,

Sarah Rue  
7083 Hendrickson Rd.  
Juneau, AK 99801



Submitted By  
Michael Sakarias  
Submitted On  
12/26/2018 1:23:03 PM  
Affiliation

I have lived in Alaska since 1979, in Juneau since 1982 and on Douglas Island since 1997. I have some comments on a few proposals under consideration by the Board.

PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES by Jesse Ross

I strongly oppose this proposal.

I well remember the outrage when a trapper managed to kill all of a wolf pack on West Douglas Island. I was appalled, and still am. I have seen wolves and heard wolves howl on a kayak trip into Endicott Arm. But, after more than 20 years living on North Douglas Island, hiking and kayaking around on North Douglas Island, I have never heard or seen wolves. They do not appear to be numerous. While I think the current regulation is insufficient to allow for what I consider a reasonable number of wolves to reside on Douglas Island, changing to no limit to the wolf hunting quota I view as abhorrent. I request that you vote do reject Proposan #22

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS by Jake Abbott

I have lived in Juneau long enough to be around when there were zero mountain goats in at least parts of the hiking accessible mountains around Juneau. I remember the work to reingtroduce goats. I have had the thrill of seeing mountain Goats close up on hikes, and of getting to thrill visiting friends with that same experience. If goats must be hunted, let that be in locations not so easily accssible to residents and visitors on the Juneau trail system. Please reject this proposal.

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU by Jake Abbott

I nearly gagged when I read this proposal. This person wants to be allowed to bait bears? I do not hunt, any more, and have never hunted bear. But, the desire to bait bears in order to kill them more easily seems a bit depraved, to me. Maybe the next proposal will be for fenced hunting parks, where one can shoot from the comfort of one's car. Please reject this proposal.

Thank you for considering my comments. Respectfully, Michael Sakarias, Juneau Alaska



Submitted By  
Katharine Savage  
Submitted On  
12/20/2018 2:33:20 PM  
Affiliation  
  
Phone  
907-957-2230  
Email  
[dock\\_savage@msn.com](mailto:dock_savage@msn.com)  
Address  
421 West 10th St  
Juneau, Alaska 99801

To the Members of the Board of Game:

I am writing in favor of Proposal 13, 5 AAC 92.095., Unlawful methods of taking furbearers; exceptions. which would reinstate the requirement for traps to be labeled with identification tags in Units 1-5.

As a veterinarian and wildlife biologist, I am familiar with the concept of humane treatment of animals as well as most trapping methods on a professional level. My husband is from Southeast Alaska and trapped a variety of furbearing mammals throughout his youth, so I am also familiar with trapping on a more personal level. I know trapping can be done in a humane fashion. I also know trapping can be done in an inhumane fashion. The Trappers Code of Ethics, as stated in the ADFG/Alaska Trappers Association Trappers Manual, includes regular checking of traps as well as trapping in the most humane way possible. I believe that requiring trapper accountability through the use of identification tags on traps will foster both of these practices. When trappers do not adhere to the Code of Ethics, the animals suffer, the profession suffers, and the industry suffers. Requiring ID tags on traps is an important added measure of assurance that trappers will be held accountable for their traps and that the Code of Ethics will be followed. Furthermore, it is likely that the ID tags will only be used in cases of irresponsible behavior; if responsible trappers follow the ADFG guidelines of setting traps away from human activity and check their traps regularly, then the identification tags should not require inspection.

Sincerely,  
Kate Savage, DVM



Submitted By  
Sally Schlichting  
Submitted On  
12/25/2018 3:11:23 PM  
Affiliation  
Juneau resident

Phone  
9079573488  
Email  
[sally.schlichting@gmail.com](mailto:sally.schlichting@gmail.com)  
Address  
419 Kennedy Street  
Juneau, Alaska 99801

I am commenting on three board of game proposals. These are:

**PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES**

Comment: I am cautiously supportive of a limited quota on wolves on Douglas Island to allow recovery of the deer population for area hunters who enjoy the Douglas Island area as an accessible hunting ground, especially for young and new hunters. However, it goes without saying that wolves are an important part of the ecosystem and I am vehemently opposed to any attempt wipe them out from Douglas as has occurred in the past. I am very concerned that the ADFG does not do any significant monitoring or enforcement, but rather relies solely on "self-reporting" to ensure that hunters aren't illegally taking wolves and hiding the carcasses. I support prosecution and stiff penalties for such violations in order to deter illegal killing. I am a lifelong Juneau resident and though I am a near daily hiker, I have yet to see a wolf and I would love to. These creatures are of value to me as a wildlife species and I want the opportunity to see one to be preserved.

**PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS**

Comment: I strongly oppose archery or other hunting of mountain goats anywhere on Mt. Juneau or Mt. Roberts. The population of mountain goats on these two mountains are a huge source of enjoyment and wonder for me, visitors, and countless other Juneau residents and recreators who use the Mt. Roberts, Mt. Juneau, Perseverance, and Granite Creek trails. These trails are heavily used throughout all months of the year, as can be attested to by the camper I encountered coming down Granite Creek in mid-November this year after she spent the night on the Mt. Juneau Ridge; by the many headlamp lights I've seen on any given evening in the winter coming down Mt. Roberts; and by the dozens of hikers and ridge runners weekly accessing the Mt. Juneau ridge throughout the spring, summer and fall months. We all find huge enjoyment in watching the mountain goats, which are a treasure of this area. Having them hunted with so many other users/recreators present puts people at risk but also spoils the experience of recreators. I urge the Board of Game to reject this proposal. I support the taking of mountain goats in other locations in the borough, such as Mt. McGinnis, Stroller White, and Mt. Bullard.

**PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU**

Comment: This is simply a ghastly proposal that has no place in the tradition of fair-chase hunting or as a practice by any self-respecting hunter. Bears are already a danger to Juneau residents, children, and pets through improperly stored garbage and baiting will make the situation even worse. I am completely opposed to bear baiting and I urge the board of game to reject this proposal.

Thank you for the opportunity to comment.



**From:** Lynn Schooler gmail  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Proposal #23 comment  
**Date:** Wednesday, December 26, 2018 4:21:00 PM

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I have reviewed the proposal before the board to open Mt. Juneau and the closed area immediately around Juneau to archery hunting for mountain goats and must ask the board to NOT accept this proposal. There are many reasons I ask this. When I first moved down to Southeast from the Kenai Peninsula in the early 80s, there were very, very few goats in that area, and it was extremely unusual to see one. The native goat population in the mountains above Juneau had been nearly eradicated by market hunters in the early years to feed the miners. Goats were only reestablished there by a joint state/private effort, using state and private contributions and state biologists to transplant a few goats up from Misty Fjords. The population grew until now it is common to view goats on the sunny slopes right above downtown and from the trails and housing developments in the valley during certain seasons. (I mention all of this here in part because I know that there is no one from Southeast on the current board, so perhaps not all the board members may be aware of the history of the present herd, or know about the effort and expense it to make goats a common sight around Juneau again.) Now, after thirty years, it's possible for Juneau residents to walk down the streets of town or sit on their decks or go hiking with their kids and have a fair chance of seeing goats during the course of their everyday activities. I can't think of anywhere else in Alaska you can go for a short hike and see goats from a relatively short distance, because the goats that use the mountainsides near the Juneau road system have become so habituated to the presence of hikers and climbers that they often don't do more than just alert a bit and watch as you pass - a fact that brings me to another point. For much of the past 30 years, I have made a large part of my income guiding professional wildlife photographers and film crews around Alaska, and the goats that frequent the areas around Juneau are the ONLY goats in the state that are both accessible enough and sufficiently habituated to give older photographers or photographers with minor mobility issues a reasonable chance. The same applies to a far larger number of people who enjoy watching wildlife. There are also a number of small and medium size businesses in Juneau that take tourists on hikes and climbs around Juneau, and accessible wildlife is always one of the biggest draws for those businesses client base. Over the years, literally thousands of visitors have felt privileged to see these goats, and dozens of jobs are made more possible by this and other Southeast wildlife opportunities. Currently, the closed area is the smaller portion by far of the contemporary goat range accessible from the road system and it seems unreasonable to open it to hunting that would alter the goats patterns and behavior. A much larger area is open than is closed. Given the 'alternate use' of the goats that utilize the slopes visible and accessible from very popular hiking trails, it seems that opening this area up to bow hunting after all these years would make a clash between user groups inevitable. Having a bow hunter take - or perhaps worse,



wound and let escape - a goat as visitors and local hikers watched could easily result in the sort of backlash that can impact small businesses that promote watchable wildlife situations.

I also oppose opening the area to goat hunting for reasons that are more about the aesthetics of the trophy hunting than financial or 'social' issues; Goat hunting has always been one of the true challenges to a hunter's abilities. If someone succeeds in taking a good goat, it is because they earn it, through effort, skill, and perseverance, under conditions that are often uncomfortable, much like getting a good full curl ram. Currently, anyone willing to put in the effort still has a very decent chance of taking a goat in the open areas reachable from the Juneau road system. But they DO have to put in the effort. A friend who took a goat this past autumn did it by hiking up the Sheep creek trail to treeline, then climbing and working his way inland to the hunting area, finding the animal he wanted, then spending hours working his way close enough for a good shot, and dropping the animal cleanly. He had to stay the night on the mountain camping dry with minimum shelter, then spend the next day skinning and caping, and packing the meat out. He worked hard for that goat and had the satisfaction of earning it. With the exception of some hunters from the native communities in northern Southeast like Klukwan, goat hunting is usually not as much about putting food on the table as about the 'trophy' that demonstrates the skill and effort required to get it. Opening up the closed areas reached easily from the road system to the taking of habituated goats would devalue that, plus deprive a large group of alternative users of their own use of this small, specific population of animals.

I would also like to draw a parallel for the board between the Dall Sheep viewing areas in other regions of the State, on the Kenai peninsula, Sheep Mountain Game Protection Area, along Turnagain Arm near Anchorage at Windy Point, and mile post 209 on the Richardson Highway, where visitors and Alaskans alike have enjoyed watching sheep for decades now, without the restrictions imposed on similar activity with national parks land, and the opportunity residents and visitors have for a similar experience with goats on the mountains near the Juneau road system, and emphasize that this is the ONLY place in the state accessible by road rather than boat where this is possible. Opening the area to hunting after three decades of effort to reestablish the herd would change that.

For these reasons, I respectfully ask the board to reject proposal #23.

Lynn Schooler  
Amalga Harbor



**From:** Lynn Schooler gmail  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Comment on Proposal #22  
**Date:** Wednesday, December 26, 2018 3:13:47 PM

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Proposal #22 to remove the three wolf take limit per year with the Douglas Island management unit in GMU-1 is unnecessary. The 3 per year limit was enacted by the Board of Game years ago after one trapper eradicated the entire pack that roamed the island and started a public outcry. The limit was enacted by the board because the board acknowledged that there is a place for wolves on the island in numbers that do not significantly effect the deer population or the supply of deer for hunters, largely from the Juneau area, and for use by non-hunter groups like wildlife photographers and 'fans.' Nothing in that has changed. There is absolutely NO reason to think the deer population on Douglas Island is being impacted by the limited number of wolves now roaming the island, or that there is any sound biological or management issue to justify taking more than three. I ask the board to maintain the status quo here, since it has worked perfectly well now for many years to give all the different user groups equal use. Change the rule to do away with that limit, and there will again very likely be a repeat of the large take that resulted in the adoption of the three wolf limit in the first place, with a repeat of the public outcry by the public and other interested user groups. And again, there is no good reason to undo what a previous board worked very hard to accomplish and balance the use of the resource.

Please do not adopt proposal #22. Maintain the status quo and leave the three wolf limit in place.

Respectfully  
L. Schooler  
Amalga Harbor



Board of Game

December 27, 2018

Via email: [dfg.bog.comments@alaska.gov](mailto:dfg.bog.comments@alaska.gov)

### Proposal 5

The Proposer does not define "taken" in their written support. Let's assume "taken" represents an animal shot and subsequently deemed illegal. Let's assume further the Proposer is stating this is occurring because of the errors in antler restriction judgement.

I believe the number of moose poached may exceed the number of animals taken. I define "poached" as intentional harvest with a disregard to antler restrictions, sex and season. Subsistence attitude, combined with opportunity (the increased population), leads to unreported harvest of all species. I cannot substantiate this claim for Southeast Region but have experienced in other parts of the state how bush rules take priority over state law.

Unit three moose population has increased significantly the past decades. 1991 had 9 moose harvested in Unit 3. Harvest counts for 2016 reported 80, 2017 120, and this year 112.

Richard Lowell was the Petersburg Game biologist until retirement earlier this year. His primary concern with an any bull hunt for Southeast Region is the effect on the age class of the herd.

Predator impact and winter conditions is constantly changing the populations which is generally evidenced by harvest amounts.

Any bull hunts can create an opportunity to overharvest in any certain year. I do not believe Southeast Region has a population that exceeds carry capacity. Part of the historic population increase experienced is the result of disturbed soils from logging that provides forage in a higher volume than an original or old growth forest. In the not so distant future the population may begin to decrease as the result forest recovery.

My concern with any bull hunt in unit three is the risk of the season rapidly evolve to a derby consisting of hunters that are not residents of the unit or SE Alaska for that matter. The appeal of any bull will surely cause the hunt to evolve to a season that may last only a number of days.

Alaska uses draw hunts to provide any bull hunt opportunity in different parts of the state generally as a population management tool and in areas where hunter demand risks overharvest. The current regulations provide for anyone to hunt Southeast Region. A draw hunt will limit individual opportunity and the odds of being successful at receiving a draw permit generally decrease with each year.



Antler restriction policies have proven to be beneficial to herd management throughout the state of Alaska over the past several decades. "If it runs well, do not screw with it" applies here in Southeast Region.

Please do not support Proposal 5.

Respectfully submitted,

  
Bradley Shaffer

PO Box 6255, Sitka, AK 99835

907-738-3218

Bradleys54@gmail.com



Submitted By  
John Sisk  
Submitted On  
12/27/2018 5:25:54 PM  
Affiliation  
none -- private citizen

**Proposal #22: Removal of Hunting Quota on Douglas Island Wolves. Opposition.**

I oppose Proposal 22 for the following reasons. I would like to see Douglas Island managed to maintain both wolves and a healthy deer population that can support a good hunting opportunities and harvest success for local hunters who do not have the means to hunt on other islands. To achieve these goals ADF&G needs to have the flexibility to restrict wolf harvest or liberalize wolf harvest over time based on changes in deer populations and habitat carrying capacity as well as wolf populations. Currently ADF&G has this management flexibility under the existing management regulations, as evidenced by the following language in the current rule: "...if the department determines that a significant deer decline has occurred or is likely to occur, the department will increase the wolf bag limit and harvest cap as necessary to avoid a decline or rebuild the deer population; as part of this determination, the department will attempt to prevent extirpation of wolves and maintain some level of wolf protection on Douglas Island." The current rule gives ADF&G the authority to make exceptions to the 3 wolf annual harvest limit for the right reasons. It also acknowledges that maintaining a wolf population on Douglas Island is an explicit objective of wildlife resource management on the island; this is right and reflects a local interest in wolves that is widely held (by many deer hunters as well as non-hunters) in the Juneau area. This new proposal would eliminate wolf harvest restrictions altogether which is too extreme. Therefore, I oppose Proposal #22.

Submitted By  
John Sisk  
Submitted On  
12/27/2018 5:45:16 PM  
Affiliation  
self

**Comment in Opposition to Proposal #23, Hunting seasons and bag limits for goat.**

I oppose Proposal #23. I've lived in Juneau long enough to remember when mountain goats were extirpated from Mount Juneau and adjacent areas. Although that was rifle hunting, bow hunting could have similar impacts to goat populations. At times I've approached very closely to mountain goats in Alaska and in the Rocky Mountains, as a recreationist and as a research assistant; it is not as hard to get within bow range of a goat as people may think -- especially in the area of concern.

I followed ADF&G's efforts to re-establish goats in the area and the eventual establishment of a robust presence of goats. Today a great many of us Juneau residents appreciate seeing those goats from downtown, from surrounding ridges and valleys, and sometimes at quite close distances. Juneau has provided spotting scopes downtown so that tourists can look for goats on Mt. Juneau. At the Mendenhall Glacier tourists watch goats on Mt. Bullard using similar scopes. I have spent countless hours observing mountain goats in the Mendenhall Glacier area, on Mount Juneau and surrounding ridges, and even on the lower side slopes of Perseverance Trail. Viewing goats in the area that would be affected by Proposal 23 is nextremely important to large numbers of local residents as well as tourists. The Board of Game should reject Proposal 23 and keep the area off limits to hunting of mountain goats.

Submitted By  
John Sisk  
Submitted On  
12/27/2018 6:08:58 PM  
Affiliation  
self

**Statement of Opposition to Proposal #28 which would open the Juneau area to bear baiting.**

I wish to go on record with the Alaska Board of Game in opposition to Proposal #28. There has been an enormous amount of public input and engagement regarding the management of black bears in the greater Juneau area and there are very good reasons that bear baiting has not been allowed and should not be allowed now. The biggest problem with bear management in this area is habituation of bears to human food and garbage as well as food and attractants provided for bears or left available inadvertently by people. When bears become habituated to people and our related food sources, both people and bears are put in danger. There may be some who believe that the solution to this challenge is to kill more or most of the bears, however that approach has been rejected soundly by Juneau for many many years. Instead, we have strict rules on human behavior and garbage to ensure very low risk of bear habituation or bear -- human contact. This has proved to be a successful management approach. Luring bears to food and scent stations so that they can be shot is at odds with this current successful management approach. It is inconsistent to impose strict limits on Juneau residents' handling of food, garbage and other bear attractants and then allow hunters to use similar attractants to lure bears into easy rifle range. A one mile distance from buildings and roads is not acceptable because the Juneau area is laced with recreational trails and trail-less areas that are used heavily for recreation. The practice of bear baiting near Juneau -- an area best characterized as urban, suburban and recreational -- also runs the risk of attracting (and potentially habituating) brown bears, wolves and other wild animals. This is simply a wrong place to bait bears, period. Therefore I am strongly opposed to Proposal #28.



# Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska

December 13, 2018

Sent: Via Fax

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

RE: Sitka Tribe of Alaska's Comments on the 2018/2019 Game Proposals

Dear Mr. Spraker,

I write on behalf of Sitka Tribe of Alaska (STA), tribal government in Sitka, Alaska for over 4,000 tribal citizens. As a tribal government, STA is responsible for the health, welfare, safety, and culture of its citizens. STA respectfully submits the following comments on the 2018/2019 Southeast Alaska game proposals.

**Proposal 1** (Opposed)

STA is opposed to this proposal due to the increased potential of wounding an animal and not being able to recover it. There is also concern the wounded animals can become aggressive and attack the hunter or other members of the public that may encounter the animal.

**Proposal 2** (Opposed)

STA is opposed to this proposal because it creates an unfair advantage for the harvest of game by landowners that is not afforded to the rest of the public.

**Proposal 3** (Opposed)

STA is opposed to this proposal since it sanctions the wasting of edible meet and violates traditional Native values of full utilization.



**Proposal 4** (Opposed)

While STA supports the exemption for hunting from a boat by a person with disabilities (as defined in AS 16.05.940), it is opposed to this proposal out of safety concerns and the increased potential for wounding/loss of the targeted animal due to poor shot placement.

**Proposal 13** (Oppose as Written)

STA supports the concept of requiring trappers to mark their traps but not with personal information. Requiring personal information (name, address, etc.) leaves trappers open to personal or public attacks by individuals or organizations opposed to trapping. Requiring traps be marked with the trapper's license or permit number (which can only be cross referenced by the State) would protect the trapper's identity.

**Proposal 14** (Opposed)

STA is opposed to the proposed requirement of posting signs near trapping locations. Posting signs near traps is an invitation for antitrapping or animal rights groups harass trappers by interfering with their legally set traps.

**Proposal 18** (Opposed)

STA is strongly opposed to the proposed increase in deer harvest limits in Unit 4. All of the communities located within the boundaries of Unit 4 are considered rural under Federal subsistence guidelines, which allows residence of these communities to harvest two additional deer under Federal subsistence regulations (on top of the State harvest limit of four deer). Currently residents of nonrural communities can legally harvest four deer in Unit 4 under State regulations. Increasing the harvest limit to six deer would create competition for the limited resource between rural and nonrural residence and impact the ability of federally qualified subsistence harvesters to meet their needs.

If you have any questions regarding these comments, contact STA's Resource Protection Director Jeff Feldpausch at (907)474-7469 or email [jeff.feldpausch@sitkatriben-sn.gov](mailto:jeff.feldpausch@sitkatriben-sn.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathy Hope Erickson", with a long, sweeping flourish extending to the right.

Kathy Hope Erickson  
Council Chair



Submitted By  
Mary A Slemmons  
Submitted On  
12/26/2018 4:51:00 PM  
Affiliation

Proposal # 22 - opposed

Submitted By  
Mary A Slemmons  
Submitted On  
12/26/2018 4:55:15 PM  
Affiliation

Proposal #23 - opposed

There are other areas nearby for archery hunting. The proposed hunting could eliminate local viewing of mountain goats. Mountain goat population does not need to be contained at this time.

Submitted By  
Mary A Slemmons  
Submitted On  
12/26/2018 4:57:26 PM  
Affiliation

Proposal #28 - opposed

Bear baiting could encourage bears to be attracted to food, something we are already struggling with.



**From:** Jeff  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** SE Game Board comments  
**Date:** Wednesday, December 26, 2018 12:36:19 AM

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**Dear Alaska Board of Game,**

I've been a resident and hunter in SE Alaska for nearly 40 years, live in Juneau and have worked across our State as far north as the Brooks Range.

Having hunted in the Juneau area and Southeast Alaska for over 30 years, I support the fair chase of hunting game in SE Alaska and would like to comment on three upcoming Board of Game Proposals to be heard in Petersburg, January 11-15 on proposed game regulation changes in the Juneau game hunting areas.

The proposals are #22, #23 and #28.

**PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES.**

**OPPOSE** – Our family has hunted deer on Douglas and unfortunately, has never had a wolf contact. We have seen wolf sign and this always makes us feel excited to know there are wolves about. We have shot our share of deer on Douglas and feel that having wolves on the island is part of a fair hunt. Knowing there are wolves around adds to the wildness of the experience. We do not support eliminating the Douglas Island Management Area in GMU 1-C and removing the annual 3 wolf harvest quota for the island. Our family feels strongly that reasonable numbers of wolves have a place on Douglas island, and that the public is well served to know that the island is wild, has wolves and that there is a chance that wolves can be seen and enjoyed by all who venture out into the wilderness. Please keep the 3 wolf harvest quota in place on Douglas Island. It works well and does not need to be changed.

**PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS**

**OPPOSE** – We strongly oppose additional archery hunting of mountain goats on Mount Juneau, Mount Roberts, and the entire Juneau area from Mendenhall river/glacier to Taku river/glacier. We lived in downtown Juneau for over 30 years and value being able to look up and see a few of the Mount Juneau goat herd on many days. As locals, we are proud to show the goats to our many visitors, as this is often the first time many SE Alaska visitors have ever seen mountain goats. We are very fortunate to be able to see goats along the Juneau road and trail system. Unlike Alaska's more remote goat areas, our local goats see summer hikers in close



proximity and do not run away. This would not be a fair chase or sporting to allow this habituated population to be hunted. I was part of a group of residents that donated funds to transplant goats back to the Mount Juneau area for viewing! This goat population is better used for wildlife viewing and non-consumptive enjoyment of goats without additional pressure from hunting. The value of goats for viewing for our local population and summer visitors is obvious. There are other hunting areas around Juneau that are more suitable to accommodate goat hunters. Please do not change or increase the current mountain goat archery areas in Juneau.

#### **PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU**

**OPPOSE:** We strongly oppose allowing in the Juneau area (1C) any black bear baiting at bait stations. Baiting black bears as a hunting method is not fair chase and is unworthy of good sport hunters. It sets up a very unsportsman like example of bear hunting to most hunters and non-hunters alike. Juneau has densely populated neighborhoods and downtown areas. We have bears in all the neighborhoods due in a very limited building areas surrounded by mountains. Allowing bear baiting has the direct possibility of causing bears to become accustomed to human food, more bear-human conflicts, and pushing bears to become garbage bears. Luring bears to bait stations with human food seems like a bad hunting policy for Juneau and has no place in a fair bear hunt. We oppose this change.

Thank you for considering my comments.

Sincerely,

Jeff Sloss  
15775 Glacier hwy., Juneau, AK 99801



Submitted By  
Nathan J. Soboleff  
Submitted On  
12/28/2018 1:45:54 PM  
Affiliation  
resident hunter and trapper

Phone  
907-321-5594  
Email  
[sobolefn@hotmail.com](mailto:sobolefn@hotmail.com)  
Address  
3025 Fritz Cove Road  
Juneau, Alaska 99801

Proposal 22 - Elimination of the Douglas Island Management Area in Unit 1C...

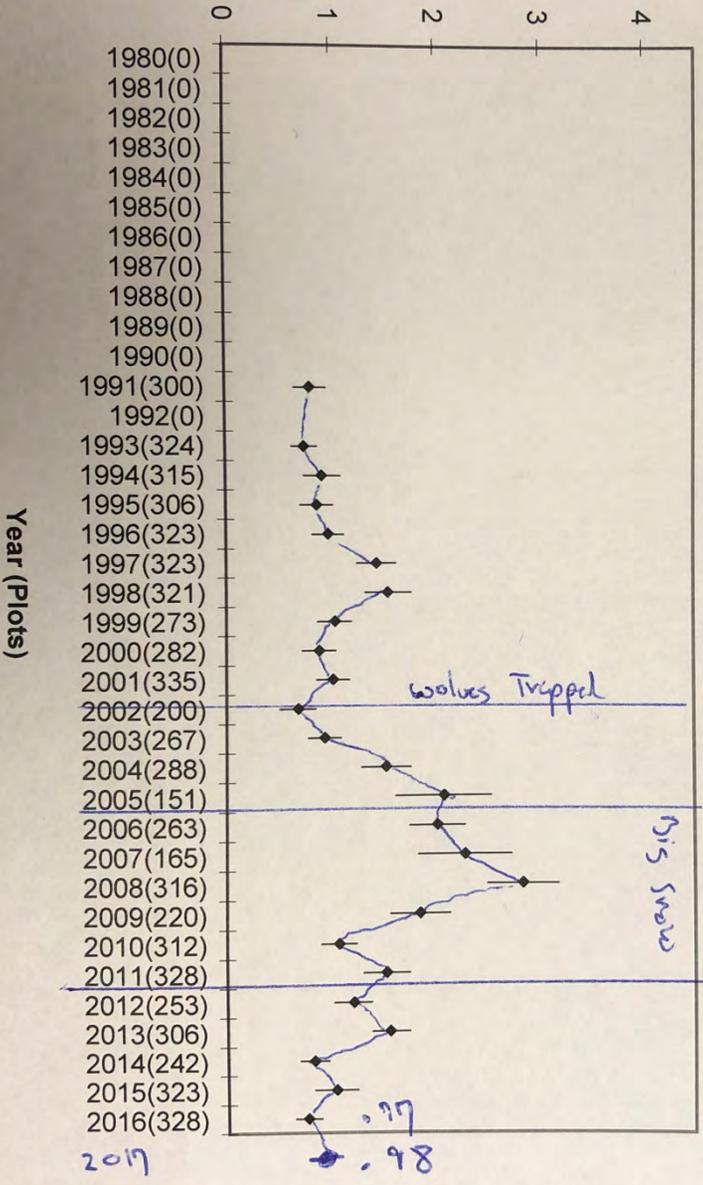
I support this proposal.

Beginning around 2002 when a pack of wolves were harvested and the Juneau community got upset and the Douglas Island Management Area was set up. Around 2013 the number of wolves shot up and there were reports of as many as 20+ wolves sighted in one day on the back side of Douglas. Around 2015/2016 three wolves were harvested and the island was emergency ordered closed to trappers. Again the 2018 three wolves were harvested and the island was closed to trapping. This does not align with the plan of closing the island when 5 wolves are harvested. Myself and other trappers made an active effort to trap wolves on our own to reduce the number of wolves on Douglas Island during the 2017/2018 season. During this whole time we did not see any deer on the beaches or deer tracks at a time when you should see many deer tracks. Pellet transects by DWC Biologist Karin McCoy has revealed that deer populations have declined tremendously since 2008 at the North Douglas and Inner Point transects. This is due to the presence of wolves. Neighboring transects on Shelter Island have shown dramatic increases in local deer populations, the difference being no wolves present which have either preyed on deer populations or prevented their numbers from rebounding after large snowfall years 2006-2008. The same goes for Admiralty Island and more areas. This "management plan" has not managed the island for hunters but for wolves and the inability of the Division to manage the wolf population has come at a great cost to 1) hunters and 2) trappers... I have emailed three graphs from Karin McCoy's work publications on SE deer populations and added lines indicating important dates to the deer population on Douglas Island.

Proposal 20 - change of management to only allow the shooting of one doe on Douglas Island...

I do not support this proposal. This proposal is a lazy attempt to increase deer populations when the culprit is the unmanaged presence of wolves. This proposal will hurt hunters with out access to boats, and it will hurt young and new hunters. In order to grow license sales we need hunters to buy licenses and we need to be able to provide hunting opportunities to those without access to boats. Additionally during the tail end of the season when bucks are supposed to drop their antlers new hunters will not be able to distinguish does from bucks resulting in missed game harvests or increase in citations.

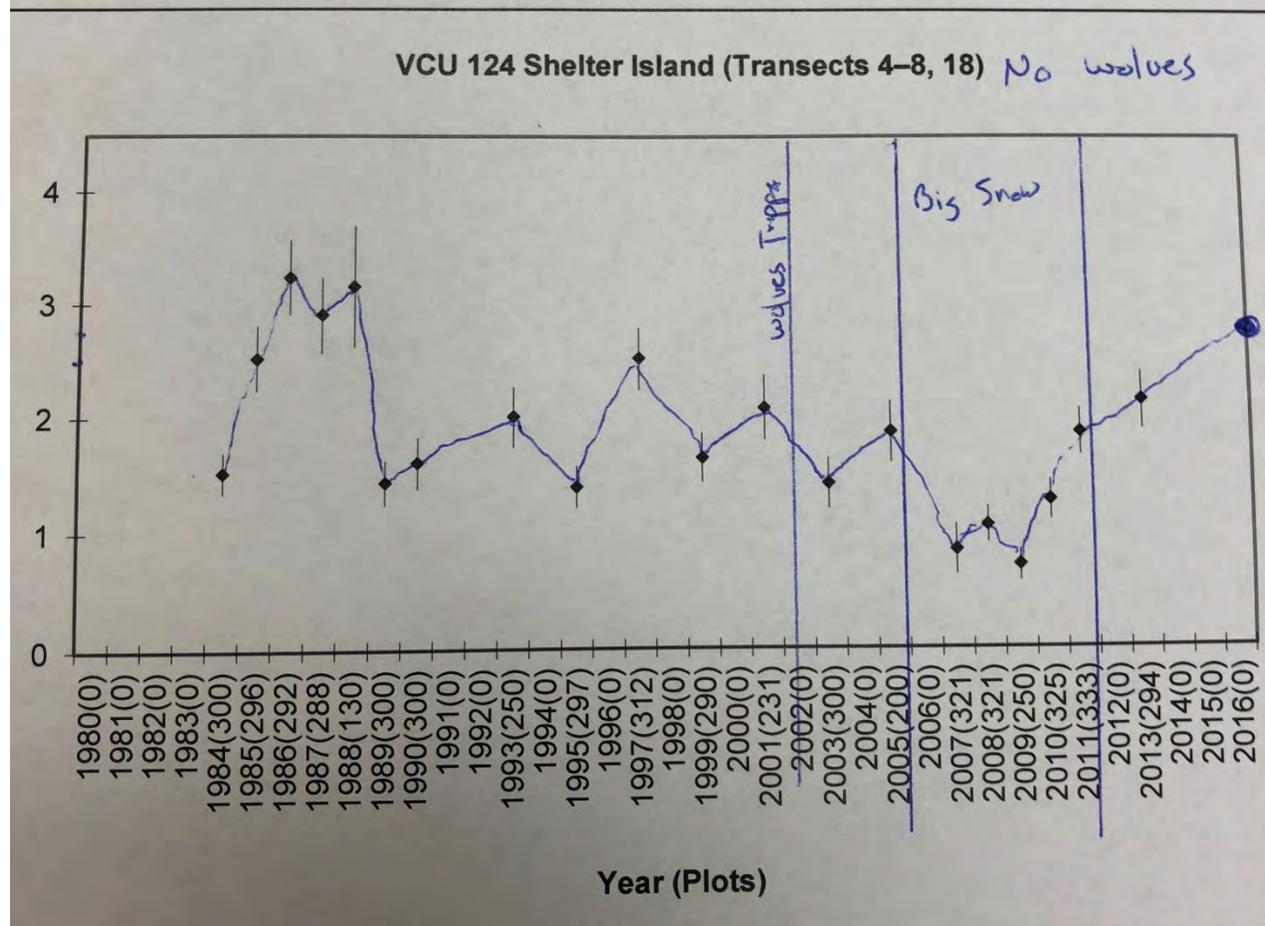
VCU 35 North Douglas - Wolves Present



e 11. Mean deer pellet-groups per plot, VCU 35, North Douglas, Alaska, 1980-2

ropped again in spring 2014. The low  
s in spring 2015 and spring 2016, however,  
likely due in part to fewer deer being more  
ly distributed during those extremely mild

Plots were chosen because they were the most easily accessed and can be completed with a 6-person crew. Because the island is narrow, each transect is relatively short. Surveyors hike one transect and then hike to the nearby start location of the next. The chart below displays pellet-group densities on only these 6 transects. Pellet-group densities for 1980-2016 that include all transects surveyed during intensive sampling may be found in Appendix 1. Shelter Island has not been surveyed since 2013, but the trend then indicated the population was increasing. Given recent mild winters, the population is suspected to be healthy. Number of plots sampled each year varies according to which transects were surveyed. Elevation was reached before encountering snow cover.



15. Mean deer pellet-groups per plot, VCU 124, Shelter Island, Alaska, 1980-2016.



ively milder winters of 2009–2010 and 2010–2011. Deer recover relatively quickly in this area, as indicated by higher counts in spring 2011 and spring 2012, after slightly below-average snowfall winters. It is unclear why the pellet-group counts dropped so significantly in spring 2014 (Fig. 13), given the winter snowfall was average and similar to that of the preceding winter. The even lower pellet-group counts in spring 2016, however, could be due in part to greater dispersal of deer across the landscape during the extremely mild 2015–2016 winter, higher pellet decomposition rates due to milder conditions, or detectability of pellet groups due to early green-up. Reports of wolves observed on Douglas Island increased during the 2015–2016 winter. The presence of wolves can affect populations by reducing numbers or slowing growth, but this has not been documented on Douglas Island. Note that the number of plots sampled each year varies according to which transect was surveyed and what elevation was reached before encountering snow cover.

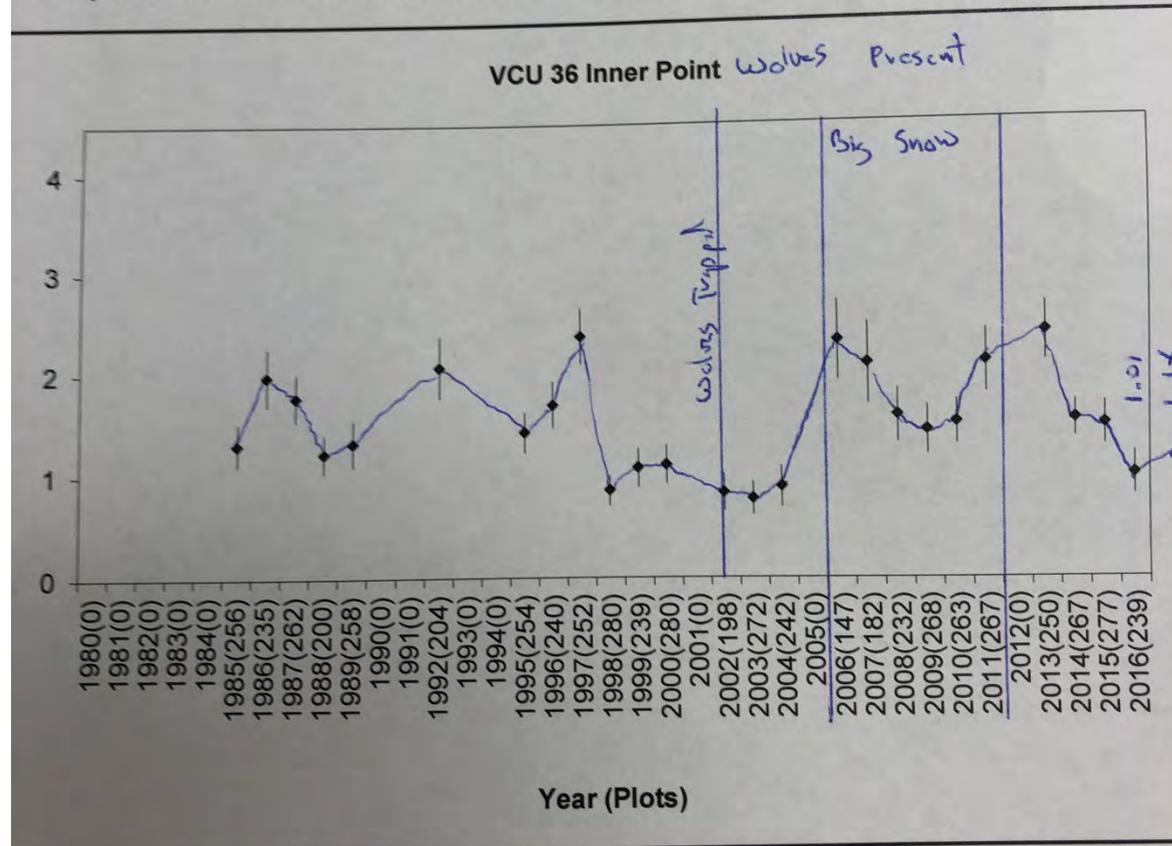


Fig. 13. Mean deer pellet-groups per plot, VCU 36, Inner Point, Douglas Island, 1980–2016.



***Southeast Alaska  
Subsistence Regional  
Advisory Council***

**Don Hernandez, Chairman  
1011 E. Tudor Road, MS121  
Anchorage, Alaska 99503**

**DEC 10 2018**

RAC SE18024.DP

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

Dear Chairman Spraker:

The Southeast Alaska Subsistence Regional Advisory Council (Council) is writing to withdraw its Proposal 42 and endorse Proposal 43, scheduled to be considered by the Alaska Board of Game at its January 11-15, 2019 meeting in Petersburg.

The Council is one of ten regional advisory councils formed under Title VIII of the Alaska National Interests Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establish its authority to initiate, review, and evaluate regulations, policies, management plans, and other matters related to subsistence within the Southeast Alaska region. The Council provides a public forum for discussion and recommendations for subsistence fish and wildlife management in the region. The Council also reviews resource management actions that may impact subsistence resources critical to Federally qualified subsistence users, whom the Council represents.

At its February 13-15, 2018 public meeting in Juneau, the Council voted to submit a proposal to the Alaska Board of Game to allow harvest up to 30% for wolves in Unit 2. This became Proposal 42. At the time we formulated Proposal 42, the Council preferred to set a management objective for wolves but did not have sufficient information to suggest a specific management objective. Subsequent to that meeting, Council members worked with staff from the Alaska Department of Fish and Game (ADF&G) to develop what is now Proposal 43.



Chairman Spraker

2

At its October 16-18, 2018 public meeting in Sitka, the Council voted to withdraw Proposal 42, and hereby communicates that request to withdraw to the Alaska Board of Game. Based on discussions between the Council Unit 2 wolf working group and ADF&G, as well as discussion on the record as a whole Council, the Council voted unanimously to support Proposal 43. This proposal calls for eliminating the 20 percent harvest guideline currently in the codified regulations and establishing a management objective for wolves in Unit 2.

The Council supports Proposal 43 for the following reasons:

1. The current State regulation unnecessarily restricts management of wolves and subsistence harvests of wolves in Unit 2 by specifying a 20% Management Harvest Guideline. This guideline limits management flexibility and unnecessarily restricts subsistence harvests in times of abundance. The Unit 2 guideline limits are much more restrictive than wolf harvest regulations for other management units in Alaska.
2. The Council has found that setting a joint State and Federal harvest quota for wolves has not been working for the following reasons:
  - a. The harvest guideline for wolves has been set according to wolf population estimates based on DNA sampling. While this methodology may come up with a good defensible population estimate for wolves, the estimate is always out of date. The harvest guideline has always been out of date, requiring managers to set a harvest guideline based on one-year old data.
  - b. In times of abundance, the harvest guideline was below what the Unit 2 wolf population could sustain.
  - c. The harvest guideline has required closing the season by emergency order for five years. This creates uncertainty and hardship for subsistence harvests.
3. Subsistence harvest of wolves in Unit 2 is a harvest activity afforded by Title VIII of ANILCA and should not be unduly restricted. Adoption of the proposed regulation (Proposal 43) will allow the continuation of subsistence harvests and the transmission of knowledge to new trappers.
4. This new management approach incorporates the principals of adaptive wildlife management.
5. The Alaska Department of Fish and Game has worked effectively with the Council and assured the Council that it will incorporate tribal and community information on wolf population management in Unit 2. The Alaska Department of Fish and Game has indicated it will also incorporate reports from hunters and trappers on the size of the wolf population based on their experience in the field. It is the Council's understanding that ADF&G will continue to undertake DNA-based population estimates every 2-4 years. The Alaska Department of Fish and Game will use other methods of wolf population estimation, including traditional ecological knowledge (TEK), hunter/trapper reports,



Chairman Spraker

3

tribal and community reports, as well as den checks, and examination of the age of harvested wolves.

6. The Council agrees that an appropriate population management objective for Unit 2 wolves is 150 wolves. We support reductions in harvest opportunity if the population drops below this point. This management objective is supported by extensive public testimony and ADF&G analysis.

Finally, the Council appreciates the work of the Alaska Department of Fish and Game in addressing wolf management issues in Unit 2. The Council especially appreciates that ADF&G has consulted meaningfully with Prince of Wales wolf harvesters and that it has worked with the Council in developing this new approach to wolf management in this unit.

Thank you for the opportunity for the Council to voice its concerns over this very important issue affecting subsistence users in the Southeast Region. Any questions regarding this letter can be addressed through our Council Coordinator, DeAnna Perry, at 907-586-7918, or [dlperry@fs.fed.us](mailto:dlperry@fs.fed.us).

Sincerely,

Donald Hernandez  
Chair

cc: Federal Subsistence Board

Thomas Doolittle, Acting Assistant Regional Director, Office of Subsistence Management  
Jennifer Hardin, PhD, Subsistence Policy Coordinator, Office of Subsistence Management  
George Pappas, State Subsistence Liaison, Office of Subsistence Management  
Carl Johnson, Supervisory Program Analyst, Office of Subsistence Management  
Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management  
Pippa Kenner, Acting Anthropology Division Supervisor  
Office of Subsistence Management  
Thomas Whitford, Regional Subsistence Program Leader, U.S. Forest Service  
Kristy Tibbles, Executive Director, Alaska Board of Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Tom Schumacher, Southeast Regional Supervisor, Alaska Department of Fish and Game  
Ryan Scott, Assistant Director, Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record



Submitted By  
Larri Spengler  
Submitted On  
12/23/2018 6:51:14 PM  
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Address  
4545 THANE RD  
Juneau, Alaska 99801

I urge the Board of Game to reject proposals 22, 23, and 28. All of these would make drastic and undesirable changes to Juneau.

Proposal 22 would repeal the Douglas Island wolf quota. Because of the ease of access by road and boat, the existing quota system was put in place to maintain a balance which will continue a presence of wolves on the island. The quota itself is a balance between too much hunting and a ban on hunting. Leave it in place, please.

Proposal 23 would allow bow hunting of mountain goats throughout the Juneau ridge system. These are all (not only the area by the Mendenhall Glacier Visitor Center) important goat viewing areas, highly valued by locals and attractive to visitors. Please leave the in-place system as it is.

Proposal 28 would allow bear baiting in Juneau. This would work to thwart all the hard and good work the community has done to try to minimize garbage bears, who often wind up having to be killed.

Thus, in summary, please consider the community that would be affected by these three proposals, and please reject them.

Thank you.

Larri Spengler

Submitted By  
Larri Spengler  
Submitted On  
12/20/2018 3:22:12 PM  
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4545 THANE RD  
Juneau, Alaska 99801

I oppose proposal # 23, which would open the Juneau ridges to bowhunting of mountain goats.

It is notable that Mount Bullard has been closed to all hunting since 1962, which was a wise management decision given the area's proximity to the Mendenhall Glacier Visitor Center. Wildlife viewing -- including and maybe especially mountain goats -- from the center and the area around it is an integral part of the experience of both locals and visitors. The quality of that viewing should not be jeopardized in any way, and opening the proposed hunt is simply too much of a risk to a valuable national, state, and local asset.

Thank you.

Larri Spengler



Submitted By  
Sondra Stanway  
Submitted On  
12/24/2018 7:43:52 AM  
Affiliation

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2935 Simpson Ave.  
Juneau, Alaska 99801

To the Board of Game:

As a resident of Douglas Island, here are my comments on the following proposals:

**Proposal no.22:** I oppose this proposal. The quota should be kept to a minimum to prevent over harvest of wolves on Douglas Island which can occur because of easy road and boat access.

**Proposal no, 23:** I oppose this proposal. This area, close to the capital city, should be used for viewing mountain goats by local residents and visitors, not for shooting them.

**Proposal no. 28:** I oppose this proposal. In our densely populated capital area, luring bears to bait stations will increase our bear/people conflicts, already a major problem around the city. Furthermore, baiting bears is simply not sportsmanlike.

Thank you.



Submitted By  
Pauline N Strong  
Submitted On  
12/27/2018 4:55:05 PM  
Affiliation

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9077236213  
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[paulinest@gmail.com](mailto:paulinest@gmail.com)  
Address  
19200 Williwaw Way  
Juneau, Alaska 99801

PROPOSAL 23 5 AAC 85.040(a)(1). Hunting seasons and bag limits for goat.

I object to this proposal. Goats were re-established in this area in the 1980's, and these are the ridges close to town. People I work with enjoy seeing them occasionally, I like seeing goats when I hike Mt. McGinnis or Mt. Roberts in the summer and by the glacier in the winter. I think this area is too close to town and tourism to be a good place for hunting goats. There are more remote areas that are open that are more appropriate.

Submitted By  
Pauline N Strong  
Submitted On  
12/27/2018 5:02:44 PM  
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19200 Williwaw Way  
Juneau, Alaska 99801

PROPOSAL 28 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.

I object to this proposal. I think bear baiting is unethical and can lead to problems with all kinds of wildlife and pets attracted to bait area. It doesn't make sense to allow bear baiting while it is unlawful to feed bears (State Regulation: 5AAC 92.230(a)(1)).

Submitted By  
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Submitted On  
12/27/2018 8:35:02 PM  
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19200 Williwaw Way  
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PROPOSAL 22 5 AAC 92.530(23). Management areas.

I object to this proposal. The same road and boat access to Douglas that allows easy deer hunting would also allow easy wolf hunting/trapping. Keeping this a distinct management area allows the most flexibility for keeping a balance of deer and wolves.



Post Office Box 32712 • Juneau, Alaska 99803

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

December 17, 2018

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

The Territorial Sportsmen, Inc., a long-established outdoorspeople's advocacy group based in Juneau, Alaska has reviewed regulatory proposals to be considered at the Petersburg meeting and submits the following comments:

Proposals 16 & 29: Shift the hunting season for migratory game birds in Units 1-4 to Sept. 1 - Dec. 16.

The Territorial Sportsmen **support** this proposal. The Board's adoption of a later start date a decade ago was an interesting attempt to optimize the season for more hunters in the region, but we believe that much more waterfowl hunting opportunity was lost by eliminating the first two weeks of September than was gained by adding the last two weeks of December. To some extent, any attempt to provide maximum opportunity to all Southeast Region hunters is impossible unless the federal migratory bird regulatory system is changed to allow additional zones in the state, due to variation in migration timing in a region that spans outer coast to Inside Passage in an east-west direction and over 365 miles north to south from Skagway to Ketchikan. Lacking such freedom under the federal system, we believe that more hunters will benefit from being able to hunt early migrants in relatively mild early September conditions as opposed to the shorter, colder days in late December, when most of the migration has passed.



Proposals 13 (Tagging of traps) & 14 (Signage on traplines).

The Territorial Sportsmen **do not support** these proposals as written. However, if the Board concludes that trap or trapline identification is necessary, we suggest that such measures be required only in specific areas of heavy multiple use where serious conflicts are demonstrated. We also recommend that any signage requirements be limited to general areas or drainages rather than individual traps or traplines.

Thank you for the opportunity to comment.

For the TSI Board,

A handwritten signature in black ink, appearing to read "Matthew Robus", with a stylized flourish at the end.

Matthew Robus, President  
Territorial Sportsmen, Inc.



Submitted By  
Kim Titus  
Submitted On  
12/28/2018 1:58:56 PM  
Affiliation

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Address  
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Juneau, Alaska 99801

Alaska Board of Game Proposal Comments

Kimberly Titus

4638 River Road

Juneau, Alaska 99801

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### **Proposal 2 – food plots for deer**

I am opposed to this proposal for a few reasons. From time to time, we have deer in our yard in Juneau, especially in the summer. They are highly selective for certain plant species (e.g., hostas, lettuce, carrot tops) but ignore many others in favor of the wild *Vaccinium* on our property.

1. Much of the private property in Southeast Alaska is within city/borough limits where there are already firearm discharge prohibitions/public safety concerns. Increasing deer populations in suburban areas where they cannot be hunted is a significant deer management issue in some parts of the USA. It results in frustration by the public and often unresolved deer management issues such as use of chemical deterrents in the environment as homeowners try to protect their shrubs and gardens, increases in deer being stuck by autos, unsuccessful attempts to sterilize deer and significant local public discourse.
2. The major private landowners in Southeast Alaska are Alaska Native corporations; whether they would want food plots on those lands is unclear.
3. It is unclear what the food plots would be composed of. If seeds were used, this would likely cause the spread of invasive plants. State and federal agencies in Alaska have programs to keep non-native plants out of the state.
4. Deer researchers in Southeast Alaska many years ago tried to attract Sitka black-tailed deer using various foods as a trapping method. These various food plots were completely unsuccessful. Put simply this deer species was not attracted to the many foods that can be used to attract mule deer or white-tailed deer.
5. I am quite confident that bears will be more attracted to a food plot than a deer.

### **Proposal 3 – deer rib meat salvage**

I am opposed to this proposal. I am an avid Sitka black-tailed deer hunter and I have harvested many deer across Southeast Alaska in the past 30 years; most from Admiralty Island. I do agree that the amount of rib meat from these deer is small. However, as the key subsistence species across Southeast Alaska, it is paramount to salvage all of the meat from the animal. Like most deer hunters, I add the meat to the burger bag. Keeping these meat salvage regulations as consistent as possible across the state for all big game is one way to reduce regulatory confusion.

### **Proposal 4 – shooting deer from a boat**

I am opposed to this proposal for 2 reasons. First, I had deer hunters shooting towards me from the bow of a large commercial fishing boat in 2006 when there was heavy snow (Seymour Canal – Admiralty Island) and many deer were on the beach. The hunters in the boat were shooting at the same deer I was stalking on the beach. I jumped out of the brush, waived my orange hat and the hunters stopped shooting and the boat moved away. Therefore, I find that there is a human safety issue. Second, I find that there is a significant deer wounding loss issue. How would hunters shooting from a large commercial fishing boat 150 yards offshore even know if they hit a deer? Even shooting from a small skiff closer to shore in saltwater poses wounding loss issues that are arguably greater than those from a hunter who is standing on firm ground.

### **Proposal 7 – eliminate black bear sealing requirement for residents**

I am opposed the elimination of black bear sealing. Black bear abundance is unknown across all of Southeast Alaska, so harvest rates are difficult to estimate. There have been two black bear studies in Southeast Alaska, one on Prince of Wales Island where abundance/density estimation was not a goal, and the other on Kuiu Island where I was involved in the project specifically to estimate abundance and density (see *Journal of Wildlife Management* 2011 - 75(6):1513-1520.). That estimate is now stale/old assuming one adopts the criteria used by the polar bear specialists group for use of old bear study results. Obtaining sex/age and other information from



sealing black bears is at least one tool that managers (ADFG) have to inform the decision-makers (Board of Game) about the status various black bear populations across the region. Harvest ticket reporting does not provide that level of detail. I disagree with the department's assertion that they can sustainably manage black bears with the loss of sealing data. There are portions of interior Alaska where sealing is not required but black bears are lightly harvested in many of those areas, so risk of overharvest is low. Black bears in many parts of Southeast Alaska are heavily harvested both by residents and nonresidents. Nonresidents make use of lodges and big game guides for black bear hunting and this activity is an important seasonal economic factor in some small communities. I suggest that the Board keep the sealing requirement so that sustainable black bear harvest can be maintained using sex/age data that is obtained via sealing along with a more complete count of harvested bears. Harvest ticket data are far less reliable. The loss of sex/age data would compromise any future analysis using some of the newer data analysis methods to estimate sustained yield. Such analysis using long term sex/age at harvest data may allow for more liberal harvest regulations while also lowering the risk of overharvest. That's just better science-based wildlife management that benefits hunters, viewer and the conservation of black bears.



Submitted By  
Michael Tobin  
Submitted On  
12/26/2018 2:18:08 PM  
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Juneau, Alaska 99803

For Board Of Game Meeting January, 11-15, 2019

Proposal 22

Oppose

This proposal fixes what isn't broken in that a decline in deer population on Douglas Island is not documented. The evidence is as described by the ADF and G for Proposal 20. The Special Management Area recognizes that in a semi-urban area like Juneau the non-consumptive use of certain animals is important to many people. The Special Management Area was created after public outcry when one trapper wiped out every wolf on Douglas Island. It was crafted as a compromise between user groups. The goal was to have some wolves and also to protect deer and deer hunters. Though it is important to revisit it periodically, there is no need to rescind the Special Management Area at this time.



Submitted By  
Tim Travis  
Submitted On  
12/27/2018 9:47:26 AM  
Affiliation

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Address  
5821 North Douglas Highway  
Juneau, Alaska 99801

I strongly support proposal 22 "Remove the Douglas Island Management Area in Unit 1C from regulation".

I live and hunt on North Douglas and I have seen a large increase of wolves on the island. These wolves are not staying on Douglas they travel across the wetlands on lower tides around the 9 mile creek area, so there is no way to know exactly how many wolves are on the island at any given time so how can you say we need to reduce trapping and hunting of wolves on Douglas when the wolves are moving on and off the island as they feel. As the Juneau wolf population continues to grow and we need to allow them to be managed by hunting and trapping, before they overwhelm our deer population.

Submitted By  
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12/27/2018 10:05:17 AM  
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As an avid waterfowl hunter I strongly support proposal 29 moving the season back to starting September 1 and ends on December 16. I agree that when they moved the season start date to the 16th it has reduced our opportunity to hunt early season migrating birds like Teal, Wigeon and Pintail. The waterfowl hunting after December 16th is very limited due to the majority of waterfowl have migrated south and you have less hunting hours due to less daylight hours. On average I take more than 50% of my annual duck harvest in September. The season should have never been moved to a September 16 start date.

Submitted By  
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Submitted On  
12/27/2018 10:19:22 AM  
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Juneau, Alaska 99801

I oppose proposal 30. There is no need for a youth only waterfowl hunting period, the youth can go hunt during the regular season with their parent or guardian just like myself and many others have over the years when growing up hunting in the Juneau area. I shot my first duck while hunting on the Mendenhall wetlands as a youth with my father and I didn't need a special youth season to do so. If we impose a youth only season on the Mendenhall wetlands it will take away from all of those other hunters who solely hunt the Mendenhall wetlands for waterfowl. I plan to take my children with me on the wetlands and hunt when they are old enough and I don't think they need a special youth only season to do so.



Submitted By  
Tim Travis  
Submitted On  
12/28/2018 8:38:45 AM  
Affiliation

I strongly disagree with proposal 19. Having worked at Greens creek mine site in the past I have never heard of anyone having an issue with people hunting in that area. The mine site is not where they will be hunting anyways, hunters may use the first section of the road (the A road) to gain easier access to the woods near the mine but thats it. This land that they are operating on by permit from the forest service belongs to the people not to the mine, they should not be able to dictate hunting in the area near the mine.

This mine site needs hunters, it needs them to help control the brown bear population in the area so they don't have another fatal attack on a miner by a brown bear.

I also find it strange that this proposal was put under the Sitka area and not the Juneau area, cause the Juneau area is who it will affect the most. Seems like someone was trying to pull a fast one.



**From:** Kristine Trott  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Board of Game Proposal #22  
**Date:** Monday, December 24, 2018 8:10:26 AM

---

Dear Board of Game,

My name is Kristine Trott and I live at 19100 Williwaw Way in Juneau, Alaska. I am a sitting member of the Juneau Advisory Committee but am writing today as a private citizen since my vote against this proposal was overwhelmed by the rest of the members. I strongly oppose Proposal #22.

Proposal #22 was put forth by a member of the JAC who is a long-time trapper and is in no way an uninterested third party.

This is a very short-sighted outlook on the issue of the wolf population on Douglas Island. It is claimed that hunter success is down due to over-predation of the deer population but I have talked with many gardeners in the north Douglas area who tell me they can't grow vegetable gardens without putting up elaborate fencing to keep out the deer. In the past, kayak guides for adventure tours could often count on being able to take their guests to the backside of Douglas and show them wolves playing or visiting the beachfront; giving their guests the thrill of a lifetime. That is no longer the case.

I have hunted on Douglas Island with my son and we have seen and heard large numbers of hunters there. The Juneau population has grown immensley since I first came here in 1978 and I believe it is the growth in hunter numbers trying for the same deer on Douglas that has been limiting hunter success and not an excess of wolves. Humans target the best of the best but wolves target the old and sick deer, which helps to keep the population healthy.

Please do not take away the limit on wolf trapping for Douglas Island. Snares and traps are a brutal and barbaric way to kill an animal, as we've witnessed twice this past summer. And that is just the tip of the iceberg! There are more people who value a live wolf than there are trappers--who, by the way, are taking a public asset for their own personal gain.



**From:** Kristine Trott  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Proposal #23 Expanded Area of Bow Hunt for Mountain Goats  
**Date:** Monday, December 24, 2018 8:41:41 AM

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My name is Kristine Trott. I live at 19100 Williwaw Way in Juneau, Alaska. I am writing in as a concerned citizen in opposition to Proposal #23.

I strongly oppose this request. I do not believe it is a safe endeavor to mix hunters into our hiking areas. I am only one of many who hike a great deal on our Juneau trails and value the wildlife experiences that we often get to have. That is a very special quality of this trail system that is so very close to our town. When I read the proposal my hair practically stood on end with the concern for people who will be hiking while there are hunters on the same trails, in the same areas. I feel the two do not mix!

In the 70's, my father, Dr. Otto Trott, came to teach mountain/emergency medicine up on the Juneau Icefields for Maynard Miller for a number of summers. The first time he arrived in Juneau he looked up at the face of Mt. Juneau and remarked, "You have a herd of mountain goats above your city.", and pointed them out to the crowd. That is the most special thing about our town and trail system: near enough to be accessible by all who want to, and safe enough for the wildlife to want to share the environment near us.

I am sorry he has no boat to travel to more inaccessible, but more appropriate hunting areas, but I cannot feel that adding bow hunters to the hiking population is a wise decision. Furthermore, these goats have become accustomed to the safe presence of humans. I have heard accounts of people stopping to rest for a picnic in the alpine areas and having some nannies and kids hanging out on a shelf just below them. How special is that?

Please do not allow hunting of this very small, very special goat population.



**From:** Kristine Trott  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Fish & Game Proposal #28 Allow Bear Baiting Near Juneau  
**Date:** Monday, December 24, 2018 9:02:28 AM

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My name is Kristine Trott. I live at 19100 Williwaw Way, Juneau, Alaska.

I strongly oppose this proposal, #28.

First off, it is so completely against fair chase hunting practices that I am horrified it is even allowed anywhere! Secondly, bear baiting has not been allowed in the Juneau area for 20 years or more because of the close confines of the city and wilderness here. People hike in groups and alone and often with their dogs on the trails and in the woods areas here. Hunters who want to bear bait would be using these same trails to access those bait stations. Bears easily become accustomed to human food sources and will tend to lose their fear and respect for humans when they learn that humans can and do provide them with easy, tasty food. The chances for a horrific encounter is increased immensely with this kind of practice.

The hunters claim of being able to pick and choose the best bear to shoot is blatantly against any kind of fair chase method of hunting. Basically, the bear is lured in with a promise and shot like a sitting duck. There is no chance for it to use its own wiles and intelligence against the hunter because this is nothing like surviving in the wilderness.

Do not allow this to become a precedence. It is not safe, it is not fair hunting. It does not belong in this community.



Submitted By  
timi tullis  
Submitted On  
12/27/2018 6:28:53 PM  
Affiliation

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Hello,

I am writing to support the passing of PROPOSAL 13, 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions AND PROPOSAL 14, 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

As an avid outdoors person I think it is only common sense to ask trappers to tag their items so that if there is an issue you know who to respond to and check in with.

Most importantly I think that it is vitally important to post signs that indicate that there are traps along a trail. For safety reasons there are requirements for other types of signage so why not for this. It simply makes sense and seems to be a long time coming.

Thank you for considering these.

Timi Tullis



Submitted By  
Patrick Valkenburg  
Submitted On  
9/24/2018 9:23:04 PM  
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Comments on Unit 4 (Baranof Island) Goat Management and Unit 3 Deer proposals

By Patrick Valkenburg

### Unit 4 Goat Management

A new management strategy for goats was implemented on Baranof Island in 2017. Although there are some advantages for hunters under the new system there are many serious problems, it represents a major change in philosophy that the Board of Game has never supported, a major and unnecessary reduction in goat hunting opportunity, and much more complexity in regulation than is warranted. Furthermore, ADF&G seems to be implementing an extremely conservative approach to goat management throughout Region I and is ignoring previous research on goat biology. **Although there are no proposals for goats in Unit 4, the Board should get Department staff to clearly outline the intent of their new management strategy for goats and make sure it is consistent with Board policy.**

Basic tenets of the new system:

1. Goat harvest will be managed on a 6 points per 100 observed goats philosophy (a billy is 1, a nanny 2).
2. No harvest will be allowed unless there are at least 35 goats seen in a management zone on the most recent survey (sightability of goats is not considered). These zones will be EO closed before the season opens.
3. There will be 34 management zones within the hunt area (RG150).
4. If one nanny is taken in a zone, the zone will be EO closed, regardless of the rate of increase of the goat population, whether winters have been mild, or where the population is in relation to the population objective.
5. If nine nannies are taken island-wide, all goat hunting on Baranof will be closed regardless of the rate of increase in the goat population or where the population is in relation to the population objective.

**Potential Advantage of the new system:** The previous management scheme for Baranof Island used larger management areas so overharvest in easily accessed areas could result in the closure of a large area. The change to using 34 small management areas potentially limits a closure to smaller area.

**Important changes in philosophy incorporated in the new management program.** Previously, the Department and the Board have also supported the idea that areas within a species range should be open to hunting unless there are good legal or conservation reasons for them to be closed, and the state has criticized federal agencies for the opposite approach. The new goat management program for goats on Baranof takes a "closed unless open" philosophy. For example, each of the 34 management areas must have a proven goat population of at least 35 goats to be opened. This implies that detailed knowledge of all 34 areas is needed every year, but goat surveys are not conducted every year. **In 2017 and 2018 almost 50% of the RG 150 hunt area was closed to hunting before the season opened.** All of south Baranof has been closed to goat hunting for 2 years. South Baranof is remote, difficult to access, and difficult to survey but has a few big billies in it. Occasional harvest of a few goats in the area would be of no consequence to the population. Reasons for the closures were originally stated as "the areas are inaccessible and have few goats". Goat surveys were not conducted before closures were again implemented in 2018 so these closures were based on 2016 and 2017 data. Typically, sightability during goat surveys is approximately 70%. It is not clear from survey data whether sightability is incorporated in estimating goat numbers in a zone. Also, using "inaccessibility" as a reason to prohibit hunting is a new philosophy not used anywhere else in Alaska.



In addition to closures implemented before the season opens, the zones that are open will be closed if a single nanny is taken. The justification for this is addressed in Frequently Asked Questions on the ADF&G website. Goats are purported to be “slow to reproduce and “vulnerable to overharvest”. These statements are factually and biologically incorrect. Goats are no “slower” at reproduction than sheep or caribou. Goats can produce twins and goat populations can increase at 15% per year when conditions are favorable. Young:adult ratios can commonly be in the range of 20-40:100. Nothing about goat biology justifies these EO closures, especially on islands like Baranof Island and Kodiak where goats are not subject to predation by wolves. Smith (1984)<sup>a</sup> reviewed population trajectories in many populations of goats in Southeast Alaska and concluded that harvest has no discernable influence on population growth when weather is mild (winter precipitation mainly falls as rain) and general restrictions on harvest are only needed after periods of severe weather. Smith’s (1984) findings for goats in Southeast were supported by Mooney (2014) for goats on Baranof. Goat populations in many areas of Southeast Alaska have been growing steadily since the end of the last period of severe winters (2006-2012). There are now about 1500 goats on the island—500 more than the population objective (Mooney 2014).

ADF&G Region I seems to be implementing a 6 points per 100 goats harvest strategy regardless of whether or how fast goat populations are increasing and are ignoring the findings of Smith (1984). For example, in the Petersburg area (Unit 1B) from LeConte Bay to Muddy River goat survey unit had about 100 goats in 2002. Under the 6 points per 100 harvest plan the population there increased to about 300 by 2018. During this time the 3 guides operating in the area were often restricted to 1 goat each per year. Clearly, the harvest management program was too conservative and opportunity was lost. Judging by trailing, digging, and other effects on the landscape, goat numbers are likely too high and not sustainable over the long term, and they are probably vulnerable to disease outbreaks. There is no research being done on goats in this area.

Proposing to close goat hunting on all of Baranof Island if 9 nannies are taken represents an absurdly conservative strategy. The current population of goats on Baranof is about 1500 (2017 data) and the management goal was to maintain >1000 goats (Mooney 2014). Biologists could not possibly detect any change in goat numbers if 9 nannies were taken. The number is completely arbitrary, ignores whether goat numbers are increasing or not, and represents collective punishment of hunters for taking nannies.

The ultimate goal of this new management program for goats has not been articulated. It appears to be an effort to ensure that harvest has no effect of goat numbers (i.e. maintaining “natural” populations). The state has criticized both the USFWS and NPS for proposing a similar philosophy with brown bears and other wildlife.

a, Smith, C. A. 1984. Evaluation and management implications of long-term trends in coastal mountain goat populations in Southeast Alaska. Pages 395–424 in Proceedings of Fourth Biennial Symposium of North American Wild Sheep and Goat Council. M. Hoefs, editor. Whitehorse, Canada.

bMooney, P. 2014. Unit 4 mountain goat management report. Pages 65–75 [In] P. Harper, editor. Mountain goat management report of survey and inventory activities 1 July 2011–30 June 2013. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR 2014- 3, Juneau.

### **Comments are Unit 3 Deer Proposal #46**

Deer in much of Unit 3 (Mitkof, Kureanof, and Zarembo Islands) declined to unhuntable numbers following severe winters from 2006 to 2010. Because of its proximity to Petersburg and the relatively accessible road system, the Board restricted deer hunting to the last 2 weeks of October on the Lindenberg Peninsula of Kupreanof Island (one of the main hunting areas for people from Petersburg). Local trappers greatly increased their efforts to take wolves on the Lindenberg Peninsula and were likely successful at temporarily reducing wolf numbers there. By 2015 deer numbers were recovering, and based on aerial survey data, by 2017 deer were abundant on the Lindenberg Peninsula. The 3-year Board cycle resulted in a delay in reopening opportunity on the Lindenberg Peninsula.

Reopening deer hunting opportunity is overdue.

The 3-year Board cycle makes responsive deer management cumbersome in the few areas of Southeast where it is needed. **One solution to this would be to modify this proposal to provide authority for the Department to implement a Conservative, Moderate, or Liberal harvest strategy, depending on previous winter weather and deer numbers on the Lindenberg Peninsula.** (Biologists can now survey deer numbers more accurately prior to the hunting season with the recently developed Alpine Aerial Survey technique, especially on the Lindenberg Peninsula). If the amended proposal is passed, following severe winters and low



aerial survey counts the Area Biologist could implement a Conservative harvest strategy (15 October-31 October-2 bucks). After moderately bad winters and/or moderate numbers of deer found during aerial surveys, a Moderate harvest strategy could be implemented (1 August-31 October-2 bucks), and when deer are abundant (as they are now) a Liberal harvest strategy could be implemented (1 August-15 November-2 bucks).

Access to the southern and northern parts of the Lindenberg Peninsula is poor but access to the central portion is very good because of the 30-mile long Tonka road system. The early season will provide opportunities for alpine deer hunting and some road based hunting with a moderate increase in harvest. Under the Liberal strategy, ending the season on 15 November will provide for greatly increased opportunity during the rut but ensure that deer are not overharvested generally when snow becomes deeper and the rut more advanced. There will doubtless be some local over harvesting along the road system but the areas of poor hunter access to the north and south will provide refugia for bucks. In this regard, the area is similar to Prince of Wales Island where the road system is overharvested but overall harvest is sustainable because of the adjacent areas with poor access. This approach has proven to be sustainable on Prince of Wales (POW) when deer are relatively abundant. The difference is that on POW winters are generally milder, especially on the southern part of the island. Periodic deep snow winters in Unit 3 require occasional but unpredictable changes in harvest management in some areas.



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11/28/2018 3:52:56 PM  
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Supplemental Comments (11/29/2018) by Patrick Valkenburg to the Board of Game on Deer management in Unit 3 (Petersburg area) and Goat Management in Unit 4 (Baranof Island).

**Unit 3 Deer:** In my first set of comments I suggested modifying **Proposal #46** to provide ADF&G discretion to implement a Conservative, Moderate, or Liberal harvest strategy on the Lindenberg Peninsula of Kupreanof Island. I did not suggest criteria for determining thresholds for the different strategies. I suggest using **30 deer per hour** in the most recent aerial surveys to separate Conservative from Moderate and **60 deer per hour** to separate Moderate from Liberal.

I noticed in the Department comments on the proposal that ADF&G suggests aligning the season and bag limit on Lindenberg Peninsula and Mitkof Island. These two areas are very different. Lindenberg Peninsula has a large, roadless wilderness area on the north end and a large roadless area on the South end. Lindenberg also has 6 or 7 good alpine areas with high quality summer deer habitat. Local overharvest of bucks along the Tonka road system would be mitigated by immigration from adjacent roadless areas.

On the other hand, Mitkof Island is completely roaded with few areas large enough to contain deer home ranges that are not roaded. Mitkof is very accessible with highway vehicles and can be hunted in any weather. Bucks can easily be overharvested on Mitkof.

**Unit 4 goat management:** In my previous comments about goat management I stated that the whole island would closed if 9 nannies were taken. That idea was dropped. However, zones are still being closed with the harvest of a single nanny. An example of this is EO 01-7-18 issued on 17 September 2018. The EO closed the Red Bluff Bay Mountain Goat Hunt Zone after a single nanny was harvested. The maximum harvest quota for the zone was listed as 5 male goats or 1 female. The EO was necessary to “restrict the harvest to the maximum sustainable level”. Maximum sustainable harvest in this zone is clearly much more than a single female goat. So I believe the EO is illegal. I think ADF&G is vulnerable to a lawsuit over these kinds of EO closures.

The following table shows harvest of goats on Baranof since 2007.

**Harvest of Goats on Baranof Island 2007-2017**

Year	Males	Females	Total	Approximate Population Size	Fem Harvest % of Pop Size
2007	26	12	38	1400	1
2008	22	10	32		<1
2009	12	<b>19</b>	31	1000	<b>2</b>
2010	16	12	28		1



2011	11	7	18	750	1
2012	17	2	19	855	<0.5
2013	18	2	20	1000	<0.5
2014	14	2	16	1100	<0.5
2015	21	2	23	1200	<0.5
2016	24	1	25	1400	<0.5
2017	24	4	28	1600	<0.5

The only year in which harvest of females was excessive was 2009 after 2 bad winters. Harvest of females has been negligible since 2011. There is no reason for continued extreme measures to control harvest of females.



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11/28/2018 10:49:49 PM  
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Comments on **Proposals 33 and 34** to establish a goat hunt on the Cleveland Peninsula of Units 1A and 1B by Patrick Valkenburg-29 November 2018

I am a Certified Wildlife Biologist and I have observed and surveyed goats on the Cleveland Peninsula since 2004. I have also reviewed historical information on these goats and scientific literature on goat populations in Alaska and other areas of North America. The population of goats on the lower Cleveland Peninsula has fluctuated between 25 and 50 for many years. Sightability is very low because many goats live in suboptimal forested habitat. There is very little good goat habitat there and it is unrealistic to expect the population to grow much beyond 50. Many of the goats are crowded on the two most suitable mountains (one on the extreme north and one on the south of the occupied area). Given the limited habitat and high percentage of kids, it is likely that goats are forced to disperse from the area because of the lack of habitat. Any goats harvested would easily be replaced by recruitment which has historically been high. Most of the animals on the ridges scattered between the northernmost and southernmost mountains are self protected from harvest because they live in forested habitat or in remote areas and would be impossible to find from the ground. It would be impossible to overharvest goats found in these areas.

**A drawing hunt with 6 permits issued annually and an expected harvest of 3-5 goats (including an occasional nanny) would be easily sustainable in years when most winter precipitation falls as rain.** In the occasional winters when most winter precipitation falls as snow it may be necessary for the Department to close the season for a year or two. Never having a hunt at all would deprive hunters of all opportunity to hunt these trophy goats. The Department's recommendations for maximum harvest of goats (6 points per 100 observed goats) are too inflexible and extremely conservative when most winter precipitation falls as rain. There are many examples of both indigenous and introduced goat populations that increase at 10-15% per year while sustaining harvests of 6 points per 100 when weather is good. Therefore, 6 points per 100 should not always be considered the maximum sustainable harvest.



Submitted By  
Vicki Van Fleet  
Submitted On  
12/27/2018 12:23:11 AM  
Affiliation

As a 45 year resident of Alaska I stand opposed to the following proposals: Proposal # 22 would remove hunting quota's for wolves on Douglas Island.....I have a remote cabin on Douglas Island and have never been bothered by wolves - rarely do I have even the chance to spot one. Let's not give another individual the opportunity to decimate the wolf populations in our area. The wolf quota that is currently in existence seemed to be working just fine. I know of many hunters on Douglas who were successful in their deer hunts this fall.

Proposal # 28 would allow bear-baiting stations in the Juneau area. This idea is ridiculous and archaic. The problem exists with citizens not maintains proper storage of garbage. Let's review the City of Juneau's policy on enforcing garbage storage procedures and solve the problem. The responsibility is on human beings - not bears



Submitted By  
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12/28/2018 2:27:10 PM  
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I urge against adoption of proposal 22. As a 36-year resident of the Juneau area, the idea that we are living in a somewhat "wild" area, with animals such as bears and wolves amongst us, is very important to me, and I think to most residents. We cherish the notion that wolves live in our area. True, this means we accept the idea that these predators do, in fact, prey on deer. To "control" the wolf population to provide more deer hunting opportunities for sportsmen is a losing proposition. We have seen over the history of the west that predator control in the name of protecting domesticated animals, or, in this case, deer hunting opportunities, makes the areas less "wild." In my view, the privilege of living in a more "wild" area, where wolves coexist with humans, outweighs any benefit to be gained by increased deer hunting opportunities. Thank you for considering my opinion.

Sincerely,  
Tom Wagner

Submitted By  
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12/28/2018 2:36:02 PM  
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As a long-time Juneau resident, I urge against adoption of proposal #23. The proposal would open Mount Bullard, Thunder Mountain, Heintzelman Ridge, all of Blackerby Ridge, Mount Juneau, Mount Roberts and areas in between to mountain goat hunting. I like the idea of living in a somewhat wild area, where there is an opportunity to view these magnificent creatures. To open the area to goat hunting would diminish the opportunity for residents to have that viewing experience, in the interest of providing hunting opportunities to a number of sportsmen. In my view, the viewing opportunity for the many should outweigh the hunting opportunity for the few. Thank you for considering my opinion.

Sincerely,  
Tom Wagner



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12/28/2018 2:44:01 PM  
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I urge against adoption of proposal #28. The proposal would require issuance of permits to hunt bear over bait or scent in unit 1C. I believe bear baiting for hunting purposes violates principles of fair chase. It would also, by habituating the bears to human-provided food and scents, increase the garbage bear problem in densely-populated Juneau. It is better for both bears and people if bears do not associate food with human presence and activities. Thank you for considering my opinion.

Sincerely,

Tom Wagner



Submitted By  
Vic Walker  
Submitted On  
12/28/2018 11:45:43 AM  
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As a longtime resident of Southeast Alaska, I strongly support proposals 13 and 14. I believe that these minor changes to the trapping regulations would have a positive effect on the community and help prevent accidental injuries to domestic dogs.



**From:** Margo Waring  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Comments on proposals #22, 23, 28  
**Date:** Sunday, December 23, 2018 5:25:27 PM

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Name: Margo Waring

Address: 11380 North Douglas Highway, Juneau, AK 99801

Hunting license holder

Regarding Proposals:

**OPPOSE**

PROPOSAL : #22. REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES

This would eliminate the Douglas Island Management Area in GMU 1-C, removing the annual 3 wolf harvest quota for The goal of the existing regulation was to guard against over harvest of wolves on the island, something that can occur because of easy road and boat access.

I live "out the road" on the North Douglas Highway. It has taken a long while to see wolves again after that trapper killed them all. We were glad that the Game Board recognized that wolves had a place on Douglas Island. We appreciate seeing them from time to time and want to keep it that way.

OPPOSE

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

I remember very clearly the time in the 1980s when goats had disappeared from Mt. Juneau and surrounding areas and at great expense goats were transplanted from the Snettisham area. It is wrong to undo what has taken so long to achieve—goats that can be seen in spring and summer, visible for local people as well as tourists. Road accessible hunting areas are available for Mountain Goat hunting and this area is not needed to also be open.



OPPOSE: PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

At our end of the North Douglas Highway, each home is visited by bears each summer. But we are very careful to leave nothing edible around. The idea that ADF&G would habituate bears to food by baiting is incredible to me. Further, any hunter who would stoop to tricking a bear in order to kill it is not worthy, in my opinion, of a hunting license.



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11/12/2018 9:06:59 PM  
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I would like to comment against proposal 12. Its not that hard to get a permit and this could cause people to target non-problem beavers outside of prime fur times possibly causing a decline in prices from the area.

I would like to comment against proposal 14. I would agree with bringing back the trap tag requirement but requiring signs to be visibly posted within 50 yards of sets would bring an increase in the theft, and tampering with, of traps and snares.

I would like to comment in support of proposal 15. I would support an extension of the waterfowl season to January 15. I don't think it needs to be extended into february though. Too long of a season could cause problems between trappers and hunters. Most trappers won't set beach sets for wolves until the waterfowl season ends to avoid catching dogs. Too long of a waterfowl season would force trappers to risk it for fear of missing out on half the season.

I would like to comment in partial support of proposal 16. I think the season should open for geese, cranes, and snipe on september 1st when these birds are more plentiful. However I believe that the season for ducks should remain the same, if not extended, since mallards are more plentiful later in the season. A few states have split openings, usually for early season teal, without incident and I believe that it would work here in Alaska as well.

I would like to comment in support of proposal 45. The extension of this season would allow for more hunting opportunities for locals without the means to safely travel further away from the area after our short season.

I would like to comment in support of proposal 46. The extension of this season would allow for more hunting opportunities for locals without the means to safely travel further away from the area after our short season.

I would like to comment in support of proposal 53. The change in regulation would allow hunters to target deer closer to town as intended. With the current regulations you can't hunt the deer that could potentially cause problems or hazards.

Thank you for allowing me to comment on these prosals and I hope my comments are taken into consideration.



Submitted By

Lisa

Submitted On

12/26/2018 10:11:22 AM

Affiliation

Self

Proposal 22: Object. Lifting the annual three-wolf quota inevitably will result in the wholesale slaughter of wolves on Douglas Island. As previously determined by the Board of Game, wolves are part of a healthy ecosystem in reasonable numbers. Retain the existing limit.

Proposal 23: Object. I and many other Juneauites and visitors have the privilege of viewing goats on Mount Juneau and Mount Roberts. The goats are a public resource that should not be killed for the benefit of a few private individuals. Retain the existing hunting closure.

Proposal 28: Object. Besides being offensive to moral hunting methods, allowing bear baiting in a populated area makes no sense. We are subject to \$100 fines for putting out our garbage too early or creating an attractive nuisance for bears - all to avoid acclimating bears to human food. Bear bating will only exacerbate the problem as well as leading to trauma and outrage in the community. Retain the existing restriction on bear baiting.



RECEIVED

DEC 08 2018

BOARDS  
ANCHORAGE

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526

Comments to 2018/2019 Proposed Changes to Regulations

From Brian West  
1000 Oceanview Drive  
Anchorage Alaska 99515

Southeast Region

Proposal 2. OPPOSE. Basically, this would allow individuals to bait deer. Does the proposer envision placing his feeding station just outside his meat shed?

Proposal 3. OPPOSE. This is wasteful. The small amount of meat recovered should not be a reason for its waste. Additionally, the proposer is concerned about bear encounters while removing the rib meat, these animals are extremely small and the entire rib cage can easily be removed from the field. There is no need to spend time in the field removing the meat from the ribs.

Proposal 6. SUPPORT. Bear meat is excellent if handled properly. When a hunter is only interested in the hide there is no incentive to care for the meat. Improper handling is the reason the meat might be bad. Priority should be given to meat salvage.

Proposal 8. SUPPORT. The statement accompanying the proposal is all that needs to be said.

Proposal 9. OPPOSE. What is the issue they are trying to solve?

Proposal 13. SUPPORT. Why was this changed in the first place? If a trapper is afraid of some sort of repercussions from having his name and other identifying information on a trap then an identifying number supplied by the Department of Fish and Game could be used.

Proposal 14. SUPPORT.

Proposal 17. SUPPORT. The Board has no authority to limit hunting to a particular user group of residents. However, they do have the authority to limit methods and means, the Board should ban commercially guided hunts in the area identified.

Proposal 19. SUPPORT. I agree with the reasoning laid out in the proposal.

Proposal 21. SUPPORT. Easily identifiable geographic boundaries should be used as much as possible.

Proposal 25. OPPOSE. This proposal is blatantly discriminatory.

Proposal 30. OPPOSE. Nothing prohibits youth from hunting during this time frame now, why is it that all others need to be banned from hunting during this time? Additionally, the proposer states that there are barriers to youth hunting. There are no barriers to youth hunting. This proposal only bans adults from hunting. I also fail to see how this proposal would eliminate the perceived overcrowding. As it



stands now a 16 or 17 year old could go hunting by themselves, this proposal would require they bring along an adult, increasing the numbers of people in the field.

Proposal 31. OPPOSE. Completely submerged is a nebulous term, a trap covered by half an inch of water meets the definition.

Proposal 32. SUPPORT. This would benefit all trappers in the long run. As the state population grows, incidents involving pets/people and traps will be used as a way to limit or ban trapping. Taking steps to minimize conflicts will only help maintain trapping in Alaska.

Proposal 37. SUPPORT.

Proposal 43. OPPOSE. I fail to understand how the HGL inhibits the ability of the Department to manage the wolf population? Their new approach seems destined to destroy the wolf population in the area. If the 14 day sealing requirement has failed to keep the harvest to within the HGL, they should shorten the reporting time. Or require harvest reports within three days and maintain the 14 day sealing requirement. In a hunt that appears to be a general hunt how can the department expect to keep the population within a specific range? They did not identify what this range should be. Instead of having a general hunt where the limit is 5 wolves, I would suggest a permit system. This would insure that not too many wolves are taken.



Submitted By  
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12/19/2018 12:07:32 PM  
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I have been hiking for over 30 years on the Juneau ridges. We love seeing the goats when we hike. I do not feel they are overpopulated at this time. Some areas have more than others. Please do not open more areas in Proposal 23 to goat hunting. I would not feel as safe knowing bow hunters are also out there.

And I know accidents happen. Years ago in WA my brother was deer hunting and another hunter shot him, though with a gun. 3 surgeries later and he did survive.

Thanks Sandy



**From:** Hannah Wilson  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Comments on Proposals 22, 23, and 28  
**Date:** Monday, December 24, 2018 2:33:48 PM

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To the Alaska Board of Game,

My name is Hannah Wilson, my residence is Juneau, Alaska, mailing address is [175 S. Franklin Street, #300, Juneau, Alaska 99801](#).

I was born and raised in Juneau and grew up hunting around Southeast as well as hiking, kayaking, and watching wildlife. Currently I guide brown bear viewing trips at various places in Southeast along with being an avid sport hunter. I strongly support fair chase of game as it is humane, respectful of the animals we hunt, and creates sustainable harvest that will continue to provide abundant hunting opportunities for future generations.

I would like to comment on three upcoming Board of Game Proposals to be heard in Petersburg, [January 11-15](#) on proposed game regulation changes in the Juneau game hunting areas.

The proposals are #22, #23 and #28.

**PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES.**

**OPPOSE –** My family hunts deer on the back side of Douglas and unfortunately, has never had a wolf contact. We have seen wolf sign and this always makes us feel excited to know there are wolves about. We have shot our share of deer on Douglas and feel that having wolves on the island is part of the fair hunt. Knowing there are wolves around adds to the wilderness and Alaskan experience. We do not support eliminating the Douglas Island Management Area in GMU 1-C and removing the annual 3 wolf harvest quota for the island. Our family feels strongly that reasonable numbers of wolves have a place on Douglas island, and that the public is well served to know that the island is wild, has wolves and that there is a chance that wolves can be seen and enjoyed by all who venture out into the wilderness. Please keep the 3 wolf harvest quota in place on Douglas Island. It works well and does not need to be changed.

**PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS**

**OPPOSE –** We strongly oppose additional archery hunting of mountain goats on Mount Juneau, Mount Roberts, and the entire Juneau area from Mendenhall river/glacier to Taku river/glacier. We live in downtown Juneau. We can look up and see the Mount Juneau goat herd on most days. All summer long, we hike the high mountain ridges in the new proposed hunting areas with the goals to see mountain goats. As locals, we are proud to show the goats to our many visitors, this is the first time many SE Alaska visitors have ever seen mountain goats. We are very fortunate to be able to see goats along the Juneau road and trail system. Unlike Alaska's more remote goat areas, our local goats see summer hikers in close proximity and do not run away. This is not a fair chase or sporting. We like to see mountain goats in the wild. The Mount Juneau area goat population is better used for wildlife viewing and non-



consumptive enjoyment of goats without additional pressure from hunting. The value of goats for viewing for our local population and summer visitors is obvious. There are other hunting areas around Juneau that are more remote to accommodate goat hunters. Please do not change or increase the current mountain goat archery areas in Juneau.

#### PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

**OPPOSE:** We strongly oppose allowing in the Juneau area (1C) any black bear baiting at bait stations. Baiting black bears as a hunting method is not fair chase and is unworthy of bear hunters. It sets up a very unsportsman like example of bear hunting to most hunters and non-hunters alike. Juneau has densely populated neighborhoods and downtown areas. We have bears in all the neighborhoods due in a very limited building areas surrounded by mountains. Allowing bear baiting has the direct possibility of causing bears to become accustomed to human food, more bear-human conflicts, and pushing bears to become garbage bears. Luring bears to bait stations with human food seems like a bad hunting policy for Juneau and has no place in a fair bear hunt. We oppose this change.

Thank you for allowing me to send in my comments to the Alaska Game Board. Please let me know if you have any questions on my comments.

Sincerely,

Hannah Wilson



**From:** Jeff Wilson  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Comments on upcoming Alaska Board of Game Proposals before deadline of December 27, 2018  
**Date:** Monday, December 24, 2018 1:34:53 PM

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Dear Alaska Board of Game,

My name is Jeffery Wilson, my residence is Juneau, Alaska, mailing address is 175 S. Franklin Street, #300, Juneau, Alaska 99801.

I have lived and hunted in the Juneau area and Southeast Alaska for over 40 years. I am an avid sport hunter and support the fair chase of hunting game in SE Alaska. It feels wrong that there is no direct representation on the Alaska Game Board from SE Alaska and specially Juneau, Alaska's capital city, so that we can contact directly our representative with our concerns and comments.

I would like to comment on three upcoming Board of Game Proposals to be heard in Petersburg, January 11-15 on proposed game regulation changes in the Juneau game hunting areas.

The proposals are #22, #23 and #28.

**PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES.**

**OPPOSE** – Our family hunts deer on the back side of Douglas and unfortunately, has never had a wolf contact. We have seen wolf sign and this always makes us feel excited to know there are wolves about. We have shot our share of deer on Douglas and feel that having wolves on the island is part of the fair hunt. Knowing there are wolves around adds to the wilderness experience. We do not support eliminating the Douglas Island Management Area in GMU 1-C and removing the annual 3 wolf harvest quota for the island. Our family feels strongly that reasonable numbers of wolves have a place on Douglas island, and that the public is well served to know that the island is wild, has wolves and that there is a chance that wolves can be seen and enjoyed by all who venture out into the wilderness. Please keep the 3 wolf harvest quota in place on Douglas Island. It works well and does not need to be changed.

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**OPPOSE** – We strongly oppose additional archery hunting of mountain goats on Mount Juneau, Mount Roberts, and the entire Juneau area from Mendenhall river/glacier to Taku river/glacier. We live in downtown Juneau. We can look up and see the Mount Juneau goat herd on most days. All summer long, we hike the high mountain ridges in the new proposed hunting areas with the goals to see mountain goats. As locals, we are proud to show the goats to our many visitors, this is the first time many SE Alaska visitors have ever seen mountain goats. We are very fortunate to be able to see goats along the Juneau road and trail system. Unlike Alaska's more remote goat areas, our local goats see summer hikers in close proximity and do not run away. This is not a fair chase or sporting. We like to see mountain goats in the wild. The Mount Juneau



area goat population is better used for wildlife viewing and non-consumptive enjoyment of goats without additional pressure from hunting. The value of goats for viewing for our local population and summer visitors is obvious. There are other hunting areas around Juneau that are more remote to accommodate goat hunters. Please do not change or increase the current mountain goat archery areas in Juneau.

#### **PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU**

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Thank you for allowing me to send in my comments to the Alaska Game Board. Please let me know if you have any questions on my comments.

Sincerely,

Jeffrey Wilson

**Jeffrey W Wilson**

175 S Franklin St, #300

Juneau, AK 99801

(W) 907-586-2100

Cell: 907-321-3210

[jwilson@wileng.net](mailto:jwilson@wileng.net)



**From:** Karen Wilson  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Comments for Board of Game meeting Jan. 11-15, 2019  
**Date:** Wednesday, December 26, 2018 7:26:54 PM

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December 26, 2018

To the Alaska Board of Game:

My name is Karen Wilson, mailing address 175 S. Franklin #300, Juneau, residence 226 Sixth Street, Juneau.

I am writing in opposition to three proposals currently before the Board and concerning the Juneau vicinity (Unit 1-C). The involved regulations were originally adopted due to particular conditions unique to the Juneau area. Those conditions have not changed, other than to have possibly intensified, making the original regulations even more appropriate.

PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES

I am adamantly opposed to removing the annual three wolf harvest quota on Douglas Island. I hike on various parts of the island on a regular basis, and while I see deer sign or occasionally a deer, I have never come across a wolf or wolf sign. And I would love to! I am not a hunter, and I highly value wildlife sightings. The hunters in my family are also opposed to killing more wolves. They are satisfied with their deer hunts on Douglas and feel it is a fair and balanced situation to have a healthy wolf population. Easy access to much of the island leaves the wolf population vulnerable to being decimated, as has happened in the past.



### PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

I oppose opening the area from the Mendenhall Glacier to the Taku Glacier to archery hunting. I was present (and thrilled) on the road below Mt. Juneau when goats from the Snettisham area were re-introduced in the 1980s. And I have been further thrilled to witness the gradual increase of goats in the area. I regularly walk Basin Road, hike the Mt. Juneau ridge, hike the area above the tram and beyond, and hike and ski around Mendenhall Lake. It is always a delight to see goats, and I love sharing that delight with visitors all summer long. Goats in all these areas are a huge highlight for visitors (who in turn give a huge boost to our local economy.) We have an unusual situation where humans and goats co-exist in the same area, and are acclimated to each other's presence. Hunting these goats would not be sporting/fair-chase, and their highest and best use for locals and visitors is to view them in their natural habitat. There are accessible, but more remote areas available to hunters.

### PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

Bear baiting must not be allowed in the Juneau area. As a downtown resident, I see more bears in my yard than I ever see in the wild and they are there for one reason--they are looking for human food. Feeding bears at bait stations will only make a serious problem worse. Our population and the bear population are restricted by geography, and we do not need any extra encouragement for bears to join us, our children and our pets in our yards. In addition, the hunters in my family are in complete agreement with me that bear baiting is in total opposition to fair-chase hunting practices. It is about as sporting as shooting a cow in a pasture.



I appeal to the Board of Game to keep these existing, long-standing regulations in place out of respect for ALL wildlife users.

Sincerely,

Karen Wilson

Juneau



**From:** Mary Willson  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** proposals 22, 23, and 28  
**Date:** Wednesday, December 26, 2018 9:01:27 AM

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I vehemently oppose all three proposals.

Bear baiting is not sporting, in any sense. Furthermore, we have enough problems with local bears getting habituated to human food. This is a really bad idea.

The Douglas wolves have been persecuted for years and barely have time to recover before somebody wants to kill again. That spoils the fun for the many local folks who enjoy hearing them sing and seeing their tracks in the snow. There are deer tracks all over the island (I have seen them) and the deer population is in no danger from wolf predation. Ha...humans kill lots more of them than the wolves do. There are plenty of deer out there for human hunters.

As for the mountain goats near the glacier and in the general area: these animals give visitors and locals a great deal of pleasure, for example watching them near Nugget Falls. The large number of people that enjoy the living animals far outnumber a few blood-hungry archers who would reduce the goat population and diminish the fun for all the rest of us.

All three proposals are bad ideas for the Juneau area.

Mary F. Willson  
Ecologist  
Juneau AK



**From:** Maia Wolf  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Written Comments for Proposals 22, 23, and 28  
**Date:** Thursday, December 27, 2018 9:01:55 AM

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Dear Alaska Board of Game,

My name is Maia Wolf, and address is 424 First Street, Juneau AK, 99801.

I moved to Juneau six years ago to work as an outdoor educator, and continue to be in awe with the area each time I take people into the wilderness. I have had the privilege to live in many beautiful places, but Juneau has been special to me since the moment I arrived. One of the things I value most about living in Juneau is the relationship between the human residents and the wildlife that lives in and around the city. To have found a community that has worked so hard and made so much space for the non-human inhabitants of the land is the primary reason that I continue to love the area. The admiration and respect for the animals that we recreate around and hunt are essential to this relationship.

I am writing to you to oppose three upcoming proposals that I believe will have severe negative impacts on the Juneau area. The three proposals are #22, #23 and #28.

#### PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES.

OPPOSE – During work trips to Douglas, we have found many traces of wolves (although unfortunately no sightings), and this has led to numerous wonderful discussions. Students are excited to know that there are still animals like wolves living in their backyard. It provides a great opportunity to discuss balanced ecosystems and predators and prey relationships, and it has sparked interest in biology and outdoor recreation in children that would otherwise spend their day in front of a screen. From a personal standpoint, I love knowing that we share that land with wolves. That we compete against them when we hunt for deer, that they know where we are and how we move,. I do not support eliminating the Douglas Island Management Area in GMU 1-C and removing the annual 3 wolf harvest quota for the island. Please keep the 3 wolf harvest quota in place on Douglas Island.

#### PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

OPPOSE – I strongly oppose additional archery hunting of mountain goats on Mount Juneau, Mount Roberts, and the entire Juneau area from Mendenhall watershed to



Taku watershed. Mountain goats are an important part of the Juneau tourists' experience: tourists can see them from the docks, they are often spotted on tours, and people who hike the trails on the ridges often get the opportunity to see them up close. As for locals, we love our mountain goats. They are often part of everyday discussion, and we love to watch their movements from our homes, cars, and coffee shops. With the additional archery hunting, Juneau mountain goats will become more weary of humans, and our opportunities for seeing them will decrease drastically. Please do not change or increase the current mountain goat archery areas in Juneau.

### PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

OPPOSE: We strongly oppose allowing in the Juneau area (1C) any black bear baiting at bait stations. Juneau works hard to make sure that black bears do not come into contact with human food, which helps avoid nuisance or aggressive bears. By allowing bear baiting, it is a distinct possibility that bear-human conflicts will increase in frequency and severity. Additionally, I believe it to be unsportsmanlike to lure bears out with human food for the purpose of hunting. I strongly oppose this proposal.

Thank you for allowing me to send in my comments to the Alaska Game Board. Please let me know if you have any questions on my comments.

Sincerely,

Maia Wolf



Submitted By  
Doug Woodby  
Submitted On  
12/27/2018 10:57:59 AM  
Affiliation

### **PROPOSAL 22 5 AAC 92.530(23). Management areas.**

I am opposed to this proposal. The current management restricting the annual harvest of wolves on Douglas Island is appropriate and should continue. Past history has demonstrated that it is possible to overharvest wolves on Douglas Island. The current management restrictions are a good compromise among the competing interests.

Submitted By  
Doug Woodby  
Submitted On  
12/27/2018 10:53:07 AM  
Affiliation

### **PROPOSAL 28 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.**

I am opposed to this proposal. Using attractants to lure bears has the unintended consequence of bears becoming accustomed to human provided foods. This practice is particularly ill-suited to Area 1C where the steep topography concentrates a dense human population that already has a garbage bear problem.

Submitted By  
Doug Woodby  
Submitted On  
12/28/2018 12:37:56 PM  
Affiliation

### **PROPOSAL 23 5 AAC 85.040(a)(1). Hunting seasons and bag limits for goat.**

I am opposed to this proposal.

The areas proposed to be open to archery hunting of goats are heavily used by hikers, including residents and tourists who enjoy seeing goats in relatively close proximity. If this proposal passes, won't those goats be chased into the backcountry and no longer readily available for the majority of trail users to see and enjoy? That seems like a high price to pay for the meager benefit bestowed on a few archery hunters who have other areas on the road system where they can hunt goats.



Submitted By  
Brenda Wright  
Submitted On  
12/26/2018 4:12:55 PM  
Affiliation

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907-789-4656

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[bewright@gci.net](mailto:bewright@gci.net)

Address  
17430 Andreanoff Dr  
Juneau, Alaska 99801

PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES

Please do not eliminate the Douglas Island Management Area in GMU 1-C, removing the annual 3 wolf harvest quota for the island. This Management Area was set up years ago to restrict the number of wolves that could be killed on Douglas Island to no more than 3 a year. The goal of the existing regulation is to guard against over harvest of wolves on the island, something that can occur because of easy road and boat access. Wolves on Douglas Island are a natural part of the ecosystem. A small population will not affect my ability to also hunt deer on Douglas Island. Please do not change the wolf harvest number on Douglas Island.

Submitted By  
Brenda Wright  
Submitted On  
12/26/2018 4:21:58 PM  
Affiliation

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907-789-4656

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17430 Andreanoff Dr  
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PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

Please do not change the present archery hunting regulation for this area. I worked for tourism for over 9 years and the goats on Mt. Juneau and Mt Roberts were the most exciting wildlife many tourists had yet seen. The possibility of seeing goats from street level in a state capitol is a point of pride for many residents.

As you all know, several areas in close proximity to the Juneau road and trail system are used by people who enjoy seeing mountain goats in the wild. In fact, it is the only chance many will ever have.

The fact that the goats were gone for many years and finally have re-established themselves in view of downtown is a special treat for residents and visitors. Please do not allow hunting of this small area. A unique experience like goat viewing is truly unusual. Please do not allow hunting to change their range or use of the mountains in downtown.

There are alternative hunting opportunities in the more remote parts of the Juneau area to accommodate goat hunters— the mountains and drainages north and west of Mendenhall river are open, for example, and accessible from the road system. The value of goats for viewing for our local population and summer visitors is obvious.



Submitted By  
Brenda Wright  
Submitted On  
12/26/2018 4:32:29 PM  
Affiliation

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Address  
17430 Andreanoff Dr  
Juneau, Alaska 99801

#### PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

As a 36 year resident of Juneau, I am very concerned about this proposal. During the 1980's many, many bears were killed in Juneau due to getting into human garbage. It took many years to finally revise the city ordinances so that humans were responsible for keeping trash safe from bears. There is no safe place to start baiting bears without training a new generation of bears to hunt for human food once again. As a hunter myself, I do not understand the procedure for "hunting" a bear attracted to your hunting site. There are no species that I enjoy hunting that I do not go into their environment to seek them out. Please do not start an old problem over again in Juneau by allowing bear baiting in our city & borough. We do not need to train bears to eat or expect human food from us. Bears are only healthy when they eat their natural foods. Hunters who are unable to seek out their prey should try a different place to hunt besides Juneau.