



The Ahtna Intertribal Resource Commission (AITRC) represents eight (8) tribal communities, two ANCSA Corporations, their shareholders & tribal citizens. We are submitting the following comments on select proposals in the Board of Games' 2020-2021 Proposal Book and 2021-2022 Supplemental Proposal Book.

**Proposal 1 —Shift hunting window to end on October 9**

AITRC **opposes** Proposal 1. While we are seeing changes in the climate, it is not consistent and not enough to push the hunting season beyond the end of September. The moose are in full rut soon after September 20. This can disrupt the moose while they are in rut and actively breeding potentially impacting fecundity.

**Proposal 51—Expand bison hunt area**

We **oppose** Proposal 51. We are concerned that this could increase trespass on native corporation lands. One of the primary reasons Ahtna, Inc. instituted for a closure for bison hunting was because the State of Alaska has never consulted with Ahtna, Inc. or Chitina Native Corporation when opening up new lands to hunting. Ahtna, Inc. has yet to be consulted concerning this closure. We oppose hunting within rights-of-way through native corporation lands.

The bison were introduced to the area at a very low number and are continuing to grow. They are expanding into different ranges. There would be ecological benefits to having more bison on the land, such as creating disturbance on the land and allowing for more willow growth.

As a result, we do not see the need for increased harvest that ADF&G has indicated. ADF&G has never done a study to determine the number of bison on the landscape.

**Proposal 52—Repeal pre-2018 caribou hunt regulations for Unit 13**

We **support** this proposal. It is a housekeeping proposal that will make the regulations more current by removing pre-2018 language.

**Proposal 53—CSH allocation—increase to 500**

We **support** this proposal to increase to 500 the number of caribou allotted for the state Community Subsistence Hunt (CSH) to accommodate for the additional demand by a larger number of hunters participating in the CSH.

Managers have often stated that the CSH never reaches its quota. However, they have repeatedly failed to provide participants in the CSH the opportunity to reach the quota. In 2020, ADF&G closed the CSH after only 178 caribou had been harvested—less than 5% of the total Unit 13 harvest (4,038 animals). 50 groups, representing a combined total of 818 permits, vied for these 178 animals. This indicates a failure to provide a reasonable opportunity for a normally diligent hunter to participate with a reasonable expectation of success, according to 5 AAC 16.05.258(f).



The CSH should have its own quota and should not close till that quota is met for both moose and caribou. Board finding number 2015-209-BOG states: "Keep the Copper Basin community subsistence hunt open for the entire season or until the Copper Basin community subsistence caribou quota has been met, whichever occurs first." ADF&G has failed to follow this direction from the BOG. While 2019-223-BOG not speak to keeping CSH open throughout the entire season, we believe the 2019 finding should be revised to reflect the 2015 finding—the CSH should remain open throughout the season or until its quota is met.

Regulatory language for the CSH states that "up to 400 animals may be taken." ADF&G managers have provided an allocation of as few as 200 animals in some years. Because of this under-allocation, and the fact that they have shut down the hunt before even this reduced quota has been reached, ADF&G has not truly been following the intent of the BOG's allocative decisions. Closing down the CSH before its quota has been met represents, again, a failure to provide for priority subsistence uses of wildlife. The department should be closing sport hunts early, not the CSH. In 2020, the department closed the draw-hunts only a few days before they closed the community harvest. In 2021, the Nelchina caribou harvest quota was determined to be 1,600 caribou, yet 10,251 permits were issued. While this includes 2,250 drawing permits, the question is raised as to whether 8,000 Alaska residents attempting to harvest less than 1,600 caribou presents a reasonable opportunity for a normally diligent subsistence hunter to harvest with a reasonable expectation of success.

#### **Proposal 54—Caribou youth season bag limits and season length**

AITRC **opposes** proposal 54. Youth can hunt with their parents during regular hunting seasons just as people have done for generations.

While we are aware of the statutory requirement that the BOG provide youth hunt opportunities (AS 16.05.255(i)), we feel that there are already adequate youth hunt opportunities currently available in the region. We do not feel this proposal should be passed because it is a non-subsistence drawing hunt. The current demand cannot support adding additional non-subsistence hunts while subsistence hunts have been closed prior to the subsistence season end dates and prior to harvest allocations being met. Furthermore, as with subsistence hunts, children often accompany their parents during regular subsistence and non-subsistence seasons.

Winter hunts are more difficult and less likely to be successful, as most caribou are migrated out of GMU13 during these months. Much of the point of youth hunts is to provide kids with positive opportunities that will entice them into further participation in hunting activity. Having a youth winter hunt thus seems misplaced.

#### **Proposal 55—Registration goat hunt in 13(A)**

AITRC **opposes** Proposal 55 because goats found in Unit 13A are likely found in the Sheep Mountain closed to hunting area. We support keeping this area closed to hunting goats.

#### **Proposal 56—Extending general season for bow-hunters**



We **oppose** this proposal. By September 25<sup>th</sup>, moose are in full rut and are not good to eat. Bow-hunters can hunt during the regular season. Unit 11 is not high-traffic and is not particularly competitive, so there should be plenty of opportunity for archery hunting.

**Proposal 57—Hunt for bow-hunters from September 21-30 in Unit 11 remainder**

We **oppose** this proposal for similar reasons to proposal 56. This hunt proposes to create a special season from September 21-30, when the moose are in full rut. For this reason, this proposal could easily result in more meat being wasted. Again, Unit 11 presents many opportunities for bow-hunting during the regular season.

Additionally, we are concerned that this proposal could disrupt the federal sheep hunting opportunity provided for elders and youth.

**Proposal 58—Reauthorize antlerless moose-hunt**

We **oppose** proposal 58, to reauthorize the antlerless moose season in Unit 13A. Unit 13A currently has no surplus of moose; the population is currently within ADF&G's management objectives. This indicates that ADF&G does not need another tool in its management toolbox at this time. If exceeding management objectives becomes an issue, ADF&G can submit a similar proposal at a future time. Reauthorizing this hunt will result in cows being harvested, which could likely destabilize the population.

These drawing hunt for cows do not provide for subsistence opportunities. One bad winter can bring the population down.

**Proposal 59—Increase any bull allocation**

We **support** this proposal to increase to 150 the number of moose allotted for the state Community Subsistence Hunt (CSH) to accommodate for the additional demand by a larger number of hunters participating in the CSH.

When the CSH was established, participation was limited to residents of eight Ahtna communities. The quota of 100 moose was intended to reflect the subsistence needs of these communities, specifically. The 2010 Manning v. State court decision required that all Alaska residents be afforded the opportunity to form community groups eligible for participation in the CSH. Today, a majority of the moose harvests in this hunt are by urban residents. Increasing the quota would reflect the larger population base that the hunt is now serving.

If there is no increase to the any bull allocation, at a minimum, ADF&G should review groups participating in the hunt to ensure that they are consistent with the regulatory definition of "community" (as defined in 5 AAC 92.072(i)(2)). Until the department actually reviews groups to ensure their consistency with this regulatory definition, there should be a moratorium on any further changes to the CSH.



In the staff comments, ADF&G has not provided the standard error for their population estimates. Accordingly, we do not know whether or not their deviation from their management objectives is statistically significant.

### **Proposal 60—Archery hunt**

We **oppose** this proposal for similar reasons to proposals 55 and 56. During the 9/25-10/15 period, moose are in full rut. Bow-hunters can hunt during the regular season. This proposal would extend the moose season, which could make it more difficult to maintain populations at management-objective levels.

As the Alaska Supreme Court noted in *McDowell v. State*, 785 P. 2d 6 (Alaska 1989): "Exclusive or special privileges to take fish and wildlife are prohibited." The bow hunters here appear to be requesting a special privilege that other groups of Alaska hunters do not have.

This proposal also involves a non-subsistence request for any-bull moose allocation in Unit 13. These moose must instead be allocated to the CSH, which is a management priority over any sport hunt. Any-bull moose opportunities are limited to Tier II applications, which identifies those who are most customarily and traditionally dependent on the resource. There are already too few any-bulls available to meet priority subsistence needs.

There is plenty of opportunity to have an archery-only hunt within non-subsistence areas and near highly populated areas.

Creating this hunt could disrupt the moose while they are in rut, actively breeding potentially impacting fecundity.

### **Proposal 61—draw hunt for bull moose for resident certified bow hunters**

We **oppose** this proposal, which would create a draw hunt for bow hunters from September 1-20. There is plenty of opportunity for archery hunting under general harvest.

Like the previous proposal, this proposal involves a non-subsistence request for any-bull moose allocation in Unit 13. These moose must instead be allocated to the CSH, which is a management priority over any sport hunt.

### **Proposal 62—Antlerless hunt in 13E**

AITRC **opposes** proposal 62, which would establish an antlerless hunt in Unit 13E. The bull-cow ratio is currently at management objectives. The harvest objective is below the management objective. Currently, the moose population is estimated at approximately 11 animals above management objectives. However, because we do not know the standard error for this estimate, it is not clear that moose populations are *significantly* above management objectives.

Environmental factors, such as heavy snow, could easily reduce the population to within or below management objectives within a single year. Additionally, there is the potential for more train fatalities.



Based on the seasons specified in this proposal, it is extremely likely that the targeting of cows will occur. From a conservation standpoint, one challenge with antlerless hunts is that some of the cows that are killed may be pregnant, effectively increasing the impact of these harvests on the following year's moose population. Cows harvested may also have calves with them, the killing of which would orphan the calves.

Although subsistence is supposed to have priority allocation, there are currently no subsistence hunts for antlerless moose in Unit 13.

Finally, we are concerned that these cow-hunts may create a conservation concern that could result in restrictions on ceremonial moose harvest.

### **Proposal 63—eliminate household bag limit in CSH**

We **support** this proposal, as it will help provide for the subsistence priority established in the Alaska Statute. The current regulations effectively preclude multiple members of the same household from hunting simultaneously in different places, because only one permit is issued for the entire household. Caribou are only present at certain places and at certain times. Allowing only one household member to hunt at a time severely limits community harvest opportunity.

One caribou is not enough for many households, especially in light of the well-documented patterns of sharing and redistribution that typically accompany subsistence uses of fish and wildlife, as recognized by the Board in community harvest hunts. In other words, a caribou harvested by one participating household may well end up feeding four or five other households. This is the nature and spirit of the community subsistence hunt: it is intended to be a collective endeavor in which community members work together to harvest and process animals, based on the needs of the community as a whole. Department comments note that this regulatory change would give the CSH a higher per-household bag limit than in Tier I hunts. Again, this reflects a community pattern of use, rather than the household pattern of use that the Tier I hunts are designed to provide.

Currently, the restriction of CSH permits limiting one per household does not support the community pattern of use the Board is trying to provide because ADF&G research has demonstrated, over the past four decades, that on average in rural Alaska, 30% of a community's households harvest 70% of the wild foods used by that community. This is why participants in the community hunt should not be limited to one bag limit per household.

This proposal would not increase the allocation or quota for the CSH, and thus would place no extra conservation burden on the resource.

### **Proposal 64 & 65—eliminate hide salvage requirements for older hunters.**

We **support** proposal 64 and 65 **with a modification requiring that the entire hunting party be over the age 60 or 62 in order for the hide salvage requirement to be optional.** We also suggest clarifying that this proposal should apply only to hunters who are actually participating in the hunt, regardless of who holds the tags for them.



This would give those hunters that are older, and who do not have younger hunters in their parties, the opportunity to leave hides in the field. This would eliminate a potential barrier that is likely to disproportionately discourage elders from participating in this hunt. As ADF&G points out in its comments, it is true that traditionally, multi-generational family groups went out hunting, working together to pack the meat and other animal products back. While many CSH participants still reflect this traditional demographic pattern, it is also the case that some elders hunt alone, or in groups with other elders. It is important that subsistence regulations should strive to reflect the flexibility and adaptability of tradition in the modern world. Compared to other demographics, elders are less likely to have ATVs that they can use to bring the hides out.

**Proposal 66 – Clarification on CSH and Federal Hunt.**

See comments on Proposal 212.

**Proposal 67 – Change salvage requirements for Sheep**

AITRC **supports** this proposal, with a modification to exempt the ribs from these proposed salvage requirements. In contrast to the front legs and hindquarters, ribs do not have very much meat on them but are quite bulky and heavy. It would be reasonable, then, to require that the quarters remain on the bone, while allowing that the ribs may be left in the field once any reasonably salvageable meat has been taken off of them.

**Proposal 68 – Bow hunt for Brown Bear July 1 – August 9**

We **oppose** this proposal: there is plenty of opportunity to hunt brown bears under the current season. GMU 11 is not a high-traffic area and is not particularly competitive, so there should be plenty of opportunity for archery hunting.

Neither brown bear hides nor meat are desirable during this time period, so the purpose of this hunt is unclear.

In the lower 48, special seasons for bow hunters reflect the fact that in most states, hunters are required to wear safety orange during the general season—something that is highly undesirable to bow hunters. In Alaska, there is no such requirement—archery hunters can wear full camouflage during the general season. Thus, there is no need for a special, separate season for bow hunters.

**Proposal 69 – Increase brown bear from 1 per year to 2 in GMU13.**

AITRC **opposes** this proposal due to its potential impacts on an ongoing research project. AITRC is currently working with the ADF&G on a population density study to fill significant data gaps on brown bears in GMU13. While AITRC is certain there are more bears than originally estimated, we are not done with the study – increasing the bag limit could have an impact on the study results. This collaborative study will produce a population abundance estimate by the next regulatory cycle to better inform the Board of Game in addressing proposals such as this.



It is imperative that AITRC and its partners have two additional years to complete this study. We would not necessarily oppose this proposal if it is proposed again during the next regulatory cycle.

**Proposal 70 – open a fall baiting season for black and brown bears in unit 13**

AITRC **opposes** this proposal. People are out in the woods hunting during this time of year. Bait-stations and the bears they attract could present a significant hazard to hunters. Bait-stations are not public knowledge, so there would be no way for the public to know where they are to avoid them.

**Proposals 71-73 – Extend wolverine season to end of February (hunting & trapping)**

AITRC **supports** proposals 71-73, which would extend the wolverine season till the end of February for both hunting and trapping. We believe this would benefit local trappers by providing them with additional harvest opportunity. Often, snow conditions are not good for trapping until late in the season. This would also contribute to regulatory consistency within the broader region.

We are not aware of any biological concerns with wolverine populations in the area. At the very least, trappers should be able to retain incidental harvest, and should not be cited for it.

**Proposal 74 – No motorized access in CSH unit 13**

AITRC **opposes** proposal 74, which would restrict motorized access to the Community Subsistence Hunt in GMU 13. Although the proposers point out that motorized transportation may give a larger advantage to nonlocal hunters, a majority of locals also depend on motorized transportation for access to the CSH. Restricting motorized access, then, will have the effect of restricting subsistence opportunity.

Although competition between urban and non-urban users may be a concern in the CSH, a larger concern is the fact that, several times in recent years, the hunt has been closed before meeting its allocation. Imposing this kind of restriction would make the CSH more restrictive than some sport hunts in Unit 13, thus going against the spirit of Alaska's subsistence priority law.

By eliminating any-bull opportunities, this proposal would effectively gut the CSH Tier II provisions that the CSH is fulfilling. Adopting this proposal could lead to eliminating the CSH. Terminating any-bull opportunity for moose would result in the lack of a reasonable opportunity for customary and traditional uses as defined by the BOG.

**Proposal 75 – Close Tokositna State Park to use of airboats for hunting**

AITRC **supports** this proposal. Airboats are very noisy and disruptive. They can be heard for many miles.

**Proposal 76 – Extend ptarmigan season at a lower bag limit in 13 B&E**

AITRC **opposes** proposals 76, to extend the ptarmigan season and lower the bag limit from 10 to 5 in units 13B. We are not aware of any conservation concerns that would justify such a change. Ptarmigan seasons were just changed during the last regulatory cycle for conservation reasons. Ptarmigan seasons and bag limits should remain consistent as much as possible, and should not be subject to constant regulatory changes.

**Proposal 77 – Youth-only ptarmigan hunt**

AITRC **opposes** this proposal. Small game animals such as ptarmigan generally tend to be oriented toward youth participation already. Youth have ample opportunity to participate in the regular ptarmigan season. Competition is not a major factor in ptarmigan hunting in this area. This proposal would restrict opportunity for adult hunters by setting back the season start-date from August 10th to August 25th.

ADF&G is already providing ample opportunity for youth hunts. The statutory requirement to establish youth hunts in AS 16.05.255(i) pertains only to big game other than bison and musk ox. There is no requirement to provide youth hunts for small game.

**Proposal 197 – reauthorize brown-bear tag fee exemption**

AITRC **supports** this proposal, as it would remove some of the barriers to participation in brown-bear harvest. Brown bear populations are currently healthy and we are not aware of any conservation concerns that this proposal would negatively impact.

**Proposal 198 – prohibit bear-bait stations within 50 miles of cabins**

AITRC **opposes** proposal 198, which would prohibit bear-bait stations within 50 miles of cabins. The proposal would amount to a de facto ban on bear-baiting in Unit 13, and the proposer says as much in the proposal: "Anyway, I propose we do away with bear-baiting."

**Proposal 199 – prohibit trapping within 50 yards of a multi-use trail**

AITRC **opposes** proposal 199, to prohibit trapping within 50 yards of multi-use trails in units 13, 14 and 16. The proposal lists nearly 50 multi-use trails in Unit 13 alone. Combined, this would amount to a significant restriction on trapping within some of the parts of 13 with the best access.

Trappers do a significant amount of maintenance on these trails. Many well-established trails, including the multi-use trails cited in this proposal, started off as trapping trails.

This proposal would unduly restrict the customary and traditional activity of Trapping. There are already decreasing number of people trapping, and this proposal may further discourage a long lived Alaskan tradition.

**Proposal 209 – Expand bison hunt**

AITRC **strongly opposes** proposal 209, which would expand the bison hunt in units 11 and 13D. We cannot find any studies that have been conducted to address the issue of the carrying capacity of the Tonsina bison herd, or that otherwise would support an increase in harvest. For instance, a moderate amount of nutritional stress may be beneficial to the bison population, as it may push them to expand their range into new areas.

There is concern about increased trespass on native corporation lands that adjoin the proposed area. Ahtna, Incorporated and Chitina Native Corporation were never consulted on expansion and potential trespass and increased land use.



### Proposals 210—eliminate CSH for moose

AITRC **opposes** this proposal to eliminate the community harvest hunt. While the inclusion of groups of all Alaskan residents have resulted in many more people participating in this CSH than originally anticipated, this opportunity is consistent with the community customary and traditional use pattern identified by the BOG. Elimination of the community harvest system for moose would result in the lack of a reasonable opportunity for customary and traditional uses as defined by the BOG.

Rather than eliminating the CSH, ADF&G needs to review groups participating in the hunt to ensure that they are consistent with the regulatory definition of “community” (as defined in 5 AAC 92.072(i)(2)).

Until the department actually reviews these groups to ensure their consistency with this regulatory definition, there should be a moratorium on any further changes to the CSH.

- According to the Area Biologist's report at the Copper Basin AC meeting in December, 2021, the moose populations are currently within their management objectives.
- The CSH any-bull harvest has represented only 9-11% of the total harvest since 2015.
- Since 2009, the CSH any bull quota of 100 moose has only been met two times (2016 and 2017).

If the CSH were eliminated, the only other viable option would be to return to Tier II status for all of Unit 13.

### Proposal 211– Eliminate CSH

The Ahtna Intertribal Resource Commission **adamantly opposes** Proposal 211.

Unfortunately, Proposal 211 submitted by the Alaska Outdoor Council contains much misinformation, which appears to be focused on soliciting further opposition to the state community hunts. In this era where “alternative facts” and falsehoods are commonly deployed to advance political agendas, the Ahtna Intertribal Resource Commission seeks to clarify the actual facts associated with the state community harvest hunts.

State and federal community harvest systems recognize in regulations the customary and traditional patterns of harvest and use that have been validated consistently through several decades of scientific research. ADF&G research demonstrates that in rural Alaskan communities, on average 30% of a community’s households often provide 70% of a total communities’ wild food harvests (see ADF&G’s pamphlet, “Alaska’s Economies and Subsistence”). We understand that for whatever reasons, the fact that these well-documented community patterns of hunting, fishing, harvesting, and sharing are quite different than the prototypical Euro-American focus on individualism where one hunter hunts one bag limit for one family’s uses with one individual permit, both the Alaska Legislature and the US Congress recognized that community patterns of use also exist and should be reflected in state and federal subsistence regulations.

The Alaska Outdoor Council, and by association their litigation funding organization, “The Alaska Fish and Wildlife Conservation Fund,” state that the Board of Game’s actions to provide a community hunt for moose and caribou in the Copper Basin were found to be unconstitutional.



However, this is not true. In 2018, the Alaska Supreme Court ruled:

*“...the community harvest permit system applied equally to all Alaska citizens and thus did not implicate equal protection or the equal access clauses...and was not a sufficient bar to access to implicate constitutional rights” (347 P.3d 97, 100, 102-103 [Alaska 2015] cited in 420 P.3d 1270 [Alaska 2018]).*

The Alaska Supreme Court continued:

*“We reiterated this holding a few months later in Manning II. In that case, we expressly rejected Manning’s argument ‘that the community harvest permit eligibility criteria are unconstitutional’ under the equal protection and equal access clauses, noting that ‘we [had] upheld the constitutionality of these criteria in AFWCF” (420 P.3d 1270 [Alaska 2018]).*

The case referred to by the Alaska Supreme Court in 2018 was filed by the Alaska Fish and Wildlife Conservation Fund (AFWCF), otherwise referred to in 2015 court documents as “The Fund.” In 2015, the Alaska Supreme Court ruled,

*“The Fund argues that the community harvest permit system is unconstitutional because it creates classifications that result in disparate treatment of Alaskans who are otherwise similarly situated. The superior court rejected this argument, reasoning that ‘[a]ny Alaskan is eligible to participate in either opportunity [i.e., the individual hunt or the community harvest] by complying with the regulatory requirements for each.’ We agree” (347 P.3d 97, 102 [Alaska 2015]).*

The State of Alaska’s subsistence priority statute (AS 16.05.258) obligates the Alaska Board of Game to provide for reasonable opportunities for customary and traditional uses of moose and caribou in the Copper Basin. The state’s statutory obligations cannot be fulfilled by federal subsistence hunting opportunities that are limited to federally qualified rural residents, especially given that there are relatively few federal lands in Unit 13 (approximately 12% according to OSM staff analysis on WSA20-03, p. 4), and federal opportunities are limited to only certain federal public lands in the area involved with the community subsistence harvest hunt area regulations.

The proponent’s contention that the original request to the Alaska Board of Game to create a community subsistence harvest hunt area on state lands is now achieved through the newly established federal community harvest system on federal public lands is incorrect as outlined above.

The proponent continues to state that the federal subsistence management program “...allows for Ahtna Intertribal Resource Commission (AITRC) to achieve their goal of exclusive community member moose and caribou hunts on federal lands in Units 11, 12, and 13” is also false. The newly established federal community harvest system is open to all eligible federally qualified rural residents living in the Census Designated Places surrounding the 8 Ahtna communities and provides the same opportunities already



available to those qualified rural residents under the individual federal caribou and moose hunting permits.

Finally, as clarified above, the Alaska Board of Game must adhere to the state subsistence law found in AS 16.05.258 and cannot ignore their obligations to provide reasonable opportunities for customary and traditional uses by deference to the Federal Subsistence Board.

Alaska Statute 16.05.330(c) is clear: “The Board of Fisheries and the Board of Game **may** adopt regulations providing for the issuance and expiration of subsistence permits for areas, **villages**, communities, groups, or individuals as needed for authorizing, regulating, and monitoring the subsistence harvest of fish and game. The boards **shall** adopt these regulations when the subsistence preference requires a reduction in the harvest of a fish stock or game population by non-subsistence users” (emphasis added).

As noted above, on Proposal 210, should this proposal pass, a reasonable opportunity for the community pattern of use, as defined by the Board, will no longer be provided. This suggests that the whole of Unit 13 would need to go back to a Tier II status for moose and caribou. Again, we urge the Board to institute a moratorium on changes to CSH regulations.

**Proposal 212—Clarify unit 13 subsistence caribou permit**

AITRC **supports** this proposal. The public should be able to have a clear understanding over the conditions associated with the CSH.

Federally-qualified hunters are still limited to one moose per person, whether they take it under state or federal regulations.

**Proposal 213—remove the requirement that Tier I caribou hunters have to hunt moose in Unit 13**

AITRC **supports** this proposal. In its comments, ADF&G may be correct that there will be more caribou hunters as a result of this proposal passing. However, this proposal will likely ease pressure on moose-hunting in the region, as moose hunters will have the option of hunting outside of Unit 13. From a subsistence standpoint, moose is a more predictable resource for food security because the populations and locations are more consistent from year to year. Large numbers of Copper Basin residents currently must compete with hunters from throughout Alaska for a small number of moose.

The narrow range in which the population objectives fall for Nelchina Caribou Herd management results in a surplus of animals that should be made available for harvest, without the onus of a regulatory requirement that negatively impacts moose population.

In its 2018 comments on a similar proposal (proposal 99), ADF&G made the following observation: "The draw hunt, which now provides up to 5,000 hunters annually an opportunity to hunt Nelchina caribou in Unit 13 without the restrictions on hunting big game throughout the rest of the state, would no longer be necessary." By eliminating the need for drawing-permit hunts for residents, this proposal will reduce regulatory complexity.

**Proposal 214 – eliminate all moose draw hunts in Unit 13**

We **support** Proposal 214 **with modification**, based on a review of the data, **to only eliminate the DM335-DM339 nonresident draw hunts.**

Alaska State law specifies that subsistence uses have priority over other uses of fish and wildlife. As it is, quotas for the CSH are lower than they should be, given that they were adopted based on the eight villages that were originally eligible to participate in the CSH. As a result, nonresident drawing hunt opportunities should not be allowed to continue while Alaska residents are not meeting their needs, and are not realizing the full regulatory season due to frequent early closures.

This modification will still allow for residents to apply for draw permits.

**Proposal 215 – Reauthorizing antlerless moose season in 13A**

AITRC opposes proposal 215, which would reauthorize the antlerless hunt in 13A. The bull-cow ratio is currently at management objectives. The harvest objective is below the management objective.

Currently, the moose population is estimated at 88 animals above the midpoint of management objectives. However, because we do not know the standard error for this estimate, it is not clear that moose populations are *significantly* above the midpoint of management objectives, as directed by the BOG. There was no reported data on the twinning rates to indicate that the habitat cannot sustain the current population. Environmental factors, such as heavy snow, could easily reduce the population to within or below management objectives within a single year.

It appears that these cow hunts are being used as a tool to keep within the bull-cow ratio while maintaining current levels of bull harvest; if there is no indication that habitat is declining, there should be no actions taken.

Although subsistence is supposed to have priority allocation, there are currently no subsistence hunts for antlerless moose in Unit 13.

Finally, we are concerned that these cow-hunts may create a conservation concern that could result in restrictions on ceremonial moose harvest.

**216 – Establish an antlerless season in 13C**

AITRC is **opposed** to proposal 216, which would establish an antlerless season in Unit 13C. Although moose are currently above management objectives in Unit 13C, they are still at approximately the proper bull-cow ratio. However, according to the ADF&G Area Biologist, the calf-cow ratio is low (12:100 rather than the objective of 30:100).

Because this would be an antlerless hunt drawing permit, it would only provide for non-subsistence uses. Rather than creating a new antlerless hunt in Unit 13C, the Board should instead increase its any-bull allocation to the Community Subsistence Hunt. This would help to ensure that subsistence needs



are being met, while also addressing any concerns ADF&G may have about moose populations being above management objectives.

There was no reported data on the twinning rates to indicate that the habitat cannot sustain the current population. Environmental factors, such as heavy snow, could easily reduce the population to within or below management objectives within a single year.

It appears that these cow hunts are being used as a tool to keep within the bull-cow ratio while maintaining current levels of bull harvest; if there is no indication that habitat is declining, there should be no actions taken.

### **217 – Eliminate all draw hunts for caribou in Unit 13**

AITRC **supports** this proposal. In 2020, ADF&G closed the Community Subsistence Hunt, failing to provide reasonable opportunity for subsistence. This is despite the fact that the BOG identified in its 2015-2019-BOG finding number 3 to keep the Copper Basin community subsistence caribou hunt open for the entire season or until the community subsistence caribou quota has been met, whichever occurs first. Eliminating non-subsistence opportunities would be a positive step toward meeting these goals.

### **218 – Increase bag limit for brown bear to 2 per year**

AITRC is **strongly opposed** to this proposal. No data have been presented to signify that the population can withstand the harvest of two brown bears per year. The State of Alaska's aerial surveys will be done in 2022. ADF&G, AITRC and Ahtna, Inc. are currently working on a study on bear density that will be completed in 2023.

### **219 – Add intensive management to 13D**

AITRC **supports** proposal 219, which would add intensive management to Unit 13D. This would be an important tool in the toolbox for managers seeking to ensure healthy ungulate populations in the area. Currently there are wolf refugia in both Wrangell St. Elias and Denali national parks. As a result, there are plenty of places in the broader landscape for wolf populations to remain strong. There are also areas within 13D that provide refugia as it is difficult to access via plane.

### **220 – Close moose and wolf hunting in 13A**

AITRC **strongly opposes** proposal 220, which would close all moose and wolf hunting in unit 13A. There are triggers for when intensive management happens. Currently population, harvest, and bull-cow-ratio are all within management objectives. Moreover, this would close down the community subsistence hunt and take away subsistence opportunity.

This proposal would simply shift hunting to other areas, causing hunting pressure to increase in those areas.

### **221 – Align otter and beaver trapping seasons**

AITRC **opposes** proposal 221, which would align otter and beaver trapping seasons. Otter pelts are not good as late in the season as are beaver pelts. Additionally, otters are already carrying and having kits at this time of year. As a result, this proposal could impact otter production.



**222 – Extend ptarmigan season and reduce bag limit**

AITRC **opposes** and sees no reason to adopt proposal 222, which would extend the ptarmigan hunting season and reduce the bag limit. Ptarmigan seasons were just changed during the last regulatory cycle for conservation reasons. It is important to keep the seasons consistent, rather than changing them every three years.



To members of the Alaska Board of Game:

On behalf of the shareholders of Ahtna, Incorporated (“Ahtna”), we are submitting the following comments on select proposals in the Board of Games’ 2020-2021 Proposal Book and 2021-2022 Supplemental Proposal Book.

**Proposal 51 - Expand the DI454 bison hunt area in Unit 11**

We oppose Proposal 51. We are concerned that this could increase trespass on Ahtna lands. One of the primary reasons for the closure that we instituted was the State of Alaska’s lack of consultation with us when opening new lands to hunting. We have yet to be consulted concerning this closure and we oppose hunting within rights-of-way through Ahtna lands.

This hunt would not represent a customary or traditional use of the resource, as bison were introduced to the area only recently. They were introduced at a very low number, are continuing to grow and are expanding into different ranges. There would be ecological benefits to having more bison on the land, such as creating disturbance on the land and allowing for more willow and spruce growth.

ADF&G has never done a study to determine the number of bison on the landscape. As a result, we do not see the need for the increased harvest that ADF&G has indicated.

**Proposal 52 - Repeal the “pre-2018” caribou hunting regulations for Unit 13**

We support this proposal. It is a housekeeping proposal that will make the regulations more current by removing pre-2018 language.

**Proposal 53 – Increase the community subsistence caribou hunt allocation in Unit 13**

We support this proposal to increase the number of caribou allotted for the state Community Subsistence Hunt (“CSH”) to 500, accommodating for the additional demand by a larger number of hunters participating in the CSH.

Managers have often stated that the CSH never reaches its quota. However, they have repeatedly failed to provide participants in the CSH the opportunity to reach the quota. In 2020, ADF&G closed the CSH after only 178 caribou had been harvested – less than 5% of the total Unit 13 harvest (4,038 animals). 50 groups, representing a combined total of 818 permits, vied for these 178 animals. This indicates a failure to provide a reasonable opportunity for a normally diligent hunter to participate with a reasonable expectation of success, according to 5 AAC 16.05.258(f).

The CSH should have its own quota and should not close until that quota is met for both moose and caribou. Board finding number 2015-209-BOG states: "Keep the Copper Basin community subsistence hunt open for the entire season or until the Copper Basin community subsistence caribou quota has been met, whichever occurs first." ADF&G has failed to follow this direction from the BOG. While Board finding number 2019-223-BOG does not speak to keeping the CSH open throughout the entire season. We believe that the 2019 finding should be revised to reflect the 2015 finding – the CSH should remain open throughout the season or until its quota is met.



Regulatory language for the CSH states that "up to 400 animals may be taken." ADF&G managers have provided an allocation of as few as 200 animals in some years. Because of this under allocation, and the fact that they have shut down the hunt before this reduced quota has been reached, ADF&G has not truly been following the intent of the BOG's allocative decisions. Closing the CSH before its quota has been met represents, again, a failure to provide priority for subsistence uses of wildlife.

ADF&G should be closing sport hunts early, not the CSH. In 2021, the ADF&G closed the draw-hunts only a few days before they closed the CSH. See Emergency Order issued January 20, 2021, closing the Nelchina Caribou Subsistence Hunt. That same year, Nelchina caribou harvest quota was determined to be 1,600 caribou and yet 10,251 permits were issued. While this includes 2,250 drawing permits, the question is raised as to whether 8,000 Alaska residents attempting to harvest less than 1,600 caribou presents a reasonable opportunity for a normally diligent subsistence hunter to harvest with a reasonable expectation of success.

#### **Proposal 54 – Increase the youth hunting season for caribou in Unit 13**

Ahtna opposes Proposal 54. Youth can hunt with their parents during regular hunting seasons just as people have done for generations.

While we are aware of the statutory requirement that the BOG provide youth hunt opportunities (AS 16.05.255(i)), we feel that there are already adequate youth hunt opportunities currently available in the region. We do not feel this proposal should be passed because it is a non-subsistence drawing hunt. The current demand cannot support adding additional non-subsistence hunts while subsistence hunts have been closed prior to the subsistence season end dates and prior to harvest allocations being met.

Winter hunts are more difficult and less likely to be successful as most caribou are migrated out of Unit 13 during these months. Much of the point of youth hunts is to provide kids with positive opportunities that will entice them into further participation in hunting activity. Having a youth winter hunt seems misplaced.

#### **Proposal 55 – Open registration goat hunt for residents in Unit 13**

Ahtna opposes Proposal 55. Goats found in Unit 13A are likely found in the Sheep Mountain area which is closed to hunting. We support keeping this area closed to goat hunting.

#### **Proposal 56 - Extend the general season for moose by bow and arrow only for residents and nonresidents within Unit 11, remainder**

We oppose Proposal 56. By September 25<sup>th</sup>, moose are in full rut and are not good to eat. Bow hunters can hunt during the regular season. Unit 11 is not high-traffic and is not particularly competitive, so there should be plenty of opportunity for bowhunting.



**Proposal 57 – Establish a registration hunt for bull moose open to certified bowhunters only within Unit 11, remainder**

We oppose Proposal 57 for similar reasons to Proposal 56. This hunt proposes to create a special season from September 21-30, when the moose are in full rut. For this reason, this proposal could easily result in more meat being wasted. Again, Unit 11 presents many opportunities for bowhunting during the regular season.

Additionally, we are concerned that this proposal could disrupt the federal sheep hunting opportunity to provide customary and traditional use to elders and youth.

**Proposal 58 - Reauthorize the antlerless moose seasons in Unit 13**

We oppose Proposal 58. Unit 13A currently has no surplus of moose; the population is currently within ADF&G's management objectives. If exceeding management objectives becomes an issue, ADF&G can submit a similar proposal at a future time. Reauthorizing this hunt will result in cows being harvested, which could likely destabilize the population.

These drawing hunts for cows do not provide for subsistence opportunities. One bad winter can bring the population down.

**Proposal 59 - Increase the community subsistence any bull moose hunt allocation in Unit 13**

We support Proposal 59, increasing the number of moose allotted for the state Community Subsistence Hunt ("CSH") to 150 to accommodate for the additional demand by a larger number of hunters participating in the CSH.

When the CSH was established, participation was limited to residents of eight Ahtna communities. The quota of 100 moose was intended to reflect the subsistence needs of these communities, specifically. The 2010 Manning v. State court decision required that all Alaska residents be afforded the opportunity to form community groups eligible for participation in the CSH. Today, a majority of the moose harvests in this hunt are by urban residents. Increasing the quota would reflect the larger population base that the hunt is now serving.

**Proposal 60 – Create a registration archery only hunt for bull moose in Unit 13**

We oppose Proposal 60 for similar reasons to Proposals 55 and 56. During the September 25<sup>th</sup> to October 15<sup>th</sup> period, moose are in full rut. Bowhunters can hunt during the regular season. This proposal would extend the moose season, which could make it more difficult to maintain populations at management-objective levels.

As the Alaska Supreme Court noted, "Exclusive or special privileges to take fish and wildlife are prohibited." *McDowell v. State*, 785 P. 2d 6 (Alaska 1989). The bowhunters here appear to be requesting a special privilege that other groups of Alaska hunters do not have.



This proposal also involves a non-subsistence request for any-bull moose allocation in Unit 13. These moose must instead be allocated to the CSH, which is a management priority over any sport hunt. Any-bull moose opportunities are limited to Tier II applications, which identifies those who are most customarily and traditionally dependent on the resource. There are already too few any-bulls available to meet priority subsistence needs.

There is plenty of opportunity to have an archery-only hunt within non-subsistence areas, near highly populated areas.

Creating this hunt could disrupt the moose while they are in rut and actively breeding.

**Proposal 61 – Establish a drawing permit hunt for bull moose limited to resident certified bowhunters only within Unit 13E**

We oppose Proposal 61, which would create a draw hunt for bowhunters from September 1-20. There is plenty of opportunity for bowhunting under general harvest.

Like Proposal 60, this proposal involves a non-subsistence request for an any-bull moose allocation in Unit 13. These moose must instead be allocated to the CSH, which is a management priority over any sport hunt.

**Proposal 62 – Establish an antlerless moose season in Unit 13E**

Ahtna opposes Proposal 62. The bull-cow ratio currently meets management objectives and the harvest objective is below management objectives.

Currently, the moose population is estimated at approximately 11 animals above management objectives. However, because we do not know the standard error for this estimate, it is not clear that moose populations are significantly above management objectives.

Environmental factors, such as heavy snow, could easily reduce the population to within or below management objectives within a single year. Additionally, there is the potential for more train fatalities.

Based on the seasons specified in this proposal, it is extremely likely that the targeting of cows will occur. From a conservation standpoint, one challenge with antlerless hunts is that some of the cows that are killed may be pregnant, effectively increasing the impact of these harvests on the following year's moose population. Cows harvested may also have calves with them, the killing of which would orphan the calves.

Although subsistence is supposed to have priority allocation, there are currently no subsistence hunts for antlerless moose in Unit 13.

Finally, we are concerned that these cow-hunts may create a conservation concern that could result in restrictions on ceremonial moose harvests.



**Proposal 63 - Eliminate the restrictions of one harvest report per household and one bag limit per household in the community subsistence hunt for Unit 13**

We support Proposal 63, as it will help provide for the subsistence priority established in Alaska's statutes. The current regulations effectively preclude multiple members of the same household from hunting simultaneously in different places, because only one permit is issued for the entire household. Caribou are only present at certain places and at certain times. Allowing only one household member to hunt at a time severely limits community harvest opportunity.

One caribou is not enough for many households, especially considering the well-documented patterns of sharing and redistribution that typically accompany subsistence uses of fish and wildlife, as recognized by the Board in community harvest hunts. In other words, a caribou harvested by one participating household may well end up feeding four or five other households. This is the nature and spirit of the CSH - it is intended to be a collective endeavor in which community members work together to harvest and process animals, based on the needs of the community as a whole.

ADF&G comments note that this regulatory change would give the CSH a higher per-household bag limit than in Tier I hunts. Again, this reflects a community pattern of use, rather than the household pattern of use that the Tier I hunts are designed to provide.

Currently, the restriction of CSH permits limiting one per household does not support the community pattern of use the Board is trying to provide because ADF&G research has demonstrated, over the past four decades, that on average in rural Alaska, 30% of a community's households harvest 70% of the wild foods used by that community. Therefore, participants in the community hunt should not be limited to one bag limit per household.

This proposal would not increase the allocation or quota for the CSH, and thus would place no extra conservation burden on the resource.

**Proposal 64 - Eliminate the salvage requirement for hide of moose for Alaska residents aged 60 years and older participating in the community subsistence moose hunt in Unit 13 and make it optional & Proposal 65 – Eliminate the moose hide salvage requirement for hunters aged 62 years and older participating in the community subsistence moose hunt in Unit 13 and make it optional**

We support Proposals 64 and 65 with a modification requiring that the entire hunting party be over the age 62 for the hide salvage requirement to be optional. We also suggest clarifying that these proposals should apply only to hunters who are actually participating in the hunt, regardless of who holds the tags for them.

This would give those hunters that are older, and who do not have younger hunters in their parties or do not have access to ATVs, the opportunity to leave hides in the field. This would eliminate a potential barrier that is likely to disproportionately discourage elders from participating in this hunt. As ADF&G points out in its comments, it is true that traditionally, multi-generational family groups went out hunting, working together to pack the meat and other animal products back. While many CSH participants still reflect this traditional demographic pattern, it is also the case that some elders hunt



alone, or in groups with other elders. It is important that subsistence regulations should strive to reflect the flexibility and adaptability of tradition in the modern world.

**Proposal 66 – Clarify the Unit 13 Tier I subsistence caribou permit condition that members in a household may not hunt caribou or moose in any other state hunts in other locations.**

We support Proposal 66. See comments on Proposal 212.

**Proposal 67 – Change the salvage requirements for sheep taken in Unit 11**

Ahtna supports Proposal 67, with a modification to exempt the ribs from these proposed salvage requirements. In contrast to the front legs and hindquarters, ribs do not have very much meat on them but are quite bulky and heavy. It would be reasonable to require that the quarters remain on the bone, while allowing that the ribs be left in the field once any reasonably salvageable meat has been gleaned off them.

**Proposal 68 – Extend the general season for brown bear by bow and arrow only for residents and nonresidents within Unit 11**

We oppose Proposal 68. There are plenty of opportunities to hunt brown bears under the current season. Unit 11 is not a high-traffic area and is not particularly competitive, so there should be plenty of opportunity for bowhunting.

Neither brown bear hides nor meat are desirable during this time period, so the purpose of this hunt is unclear.

In the lower 48, special seasons for bowhunters reflect the fact that in most states, hunters are required to wear safety orange during the general season—something that is highly undesirable to bowhunters. In Alaska, there is no such requirement—bowhunters can wear full camouflage during the general season. Thus, there is no need for a special, separate season for bowhunters.

**Proposal 69 – Increase the bag limit for brown bear in Unit 13**

Ahtna opposes this proposal due to potential impacts on an ongoing research project. Ahtna is currently partnering with AITRC and the ADF&G on a population density study to fill significant data gaps on brown bears in Unit 13. While we are certain there are more bears than originally estimated, they are not done with the study – increasing the bag limit could have an impact on the study results. This collaborative study will produce a population abundance estimate by the next regulatory cycle to better inform the Board in addressing proposals such as this in the future.

It is imperative that Ahtna and its partners have two additional years to complete this study. We would not necessarily oppose this proposal if proposed again during the next regulatory cycle.



### **Proposal 70 – Open a fall baiting season in Unit 13 for brown and black bear**

Ahtna opposes Proposal 70. People are out in the woods hunting during this time of year. Bait-stations are not public knowledge, so there would be no way for the public to know where they are to avoid them. Bait-stations and the bears they attract could present a significant hazard to hunters.

### **Proposals 71-73 – Extend the wolverine hunting and trapping seasons in Unit 13**

Ahtna supports Proposals 71-73, which would extend the wolverine season until the end of February for both hunting and trapping. We believe this would benefit local trappers by providing them with additional harvest opportunity. Often, snow conditions are not good for trapping until late in the season. This would also contribute to regulatory consistency within the broader region.

At the very least, trappers should be able to retain incidental harvest, and should not be cited for it.

### **Proposal 74 – Limit motorized access during the community subsistence moose hunt in Unit 13**

Ahtna opposes Proposal 74, which would restrict motorized access to the Community Subsistence Hunt (“CSH”) in Unit 13. Although the proposers point out that motorized transportation may give a larger advantage to nonlocal hunters, a majority of locals also depend on motorized transportation for access to the CSH. Restricting motorized access will have the effect of restricting subsistence opportunity. Although competition between urban and non-urban users may be a concern in the CSH, a larger concern is the fact that, several times in recent years, the hunt has been closed before meeting its allocation. Imposing this kind of restriction would make the CSH more restrictive than some sport hunts in Unit 13, going against the spirit of Alaska's subsistence priority law.

By limiting motorized access, any-bull opportunities are reduced. Adopting this proposal could lead to eliminating the CSH.

### **Proposal 75 – Close the Tokositna State Recreation Area in Units 13E and 16A to the use of airboats for hunting**

Ahtna supports Proposal 75. Airboats are very noisy and disruptive and can be heard for many miles.

### **Proposal 76 – Extend the ptarmigan season and the lower bag limit in Unit 13 B and 13E**

Ahtna opposes Proposal 76. We are not aware of any conservation concerns that would justify such a change. Ptarmigan seasons were just changed during the last regulatory cycle for conservation reasons. Ptarmigan seasons and bag limits should remain consistent as much as possible and should not be subject to constant regulatory changes.



### **Proposal 77 – Open a youth-only hunt for ptarmigan in Unit 13, August 10-24**

Ahtna opposes Proposal 77. Small game animals such as ptarmigan tend to be oriented toward youth participation already. Youth have ample opportunity to participate in the regular ptarmigan season. Competition is not a major factor in ptarmigan hunting in this area. This proposal would restrict opportunity for adult hunters by setting back the season start-date from August 10th to August 25th.

ADF&G is already providing ample opportunity for youth hunts. The statutory requirement to establish youth hunts in AS 16.05.255(i) pertains only to big game other than bison and musk ox. There is no requirement to provide youth hunts for small game.

### **Proposal 197 – Reauthorize the brown bear tag fee exemption for the Central/Southwest Region**

Ahtna supports this proposal, as it would remove some of the barriers to participation in brown bear harvest. Brown bear populations are currently healthy and we are not aware of any conservation concerns that this proposal would negatively impact.

### **Proposal 198 – Eliminate bear baiting or prohibit bear bait stations within 50 miles of cabins**

Ahtna strongly opposes Proposal 198. The proposal would amount to a de facto ban on bear-baiting in Unit 13, and the proposer says as much in the proposal: "Anyway, I propose we do away with bear-baiting."

### **Proposal 199 – Prohibit trapping within 50 yards of a multi-use trails and trailheads in Units 13, 14, and 16**

Ahtna opposes Proposal 199. The proposal lists nearly 50 multi-use trails in Unit 13 alone. Combined, this would amount to a significant restriction on trapping within some of the parts of Unit 13 with the best access.

Trappers do a significant amount of maintenance on these trails. Many well-established trails, including the multi-use trails cited in this proposal, started off as trapping trails.

Trapping is a customary and traditional activity that this proposal would unduly restrict. There is already a decreasing number of people trapping, and this proposal may further discourage the activity.

### **Proposal 209 – Modify the Copper River bison harvest opportunity in Units 11 and 13D**

Ahtna strongly opposes Proposal 209, which would expand the bison hunt in units 11 and 13D. We cannot find any studies that have been conducted to address the issue of the carrying capacity of the Tonsina bison herd, or that otherwise would support an increase in harvest. For instance, a moderate amount of nutritional stress may be beneficial to the bison population, as it may push them to expand their range into new areas.



There is concern about increased trespass on native corporation lands that adjoin the proposed area. Ahtna and Chitina Native Corporation were never consulted about this proposal.

The bison hunt is a drawing permit hunt and is not customary or traditional.

### **Proposals 210 – Eliminate the community subsistence harvest moose hunts in Unit 13**

Ahtna opposes this proposal to eliminate the Community Subsistence Hunt (“CSH”). While the inclusion of groups of all Alaskan residents has resulted in many more people participating in this CSH than originally anticipated, this opportunity is consistent with the community customary and traditional use pattern identified by the BOG in 2006 and 2011. The BOG recognized that the community-based pattern of subsistence hunting originated with the Ahtna-Athabascan communities in the region and was adopted later by other Alaska residents. The CSH provides an important opportunity for Alaskans to meet their subsistence needs. Elimination of the community harvest system for moose would result in the lack of a reasonable opportunity for customary and traditional uses as defined by the BOG.

If the CSH were eliminated, the only other viable option would be to return to Tier II status for all of Unit 13.

Rather than eliminating the CSH, ADF&G should review groups participating in the hunt to ensure that they are consistent with the regulatory definition of “community” (as defined in 5 AAC 92.072(i)(2)).

Subsistence needs for customary and traditional users of the resource are not being met. According to the Area Biologist's report at the Copper Basin AC meeting, moose populations are currently within their management objectives.

The CSH any-bull harvest has represented only 9-11% of the total harvest since 2015. Since 2009, the CSH any bull quota (100 moose) has only been met two times (2016 and 2017).

### **Proposal 211 – Repeal the Copper Basin area community subsistence harvest hunt area for moose and caribou & Proposal 244 – Eliminate all community subsistence harvest hunts**

Ahtna opposes Proposals 211 & 244.

Unfortunately, Proposal 211 submitted by the Alaska Outdoor Council contains much misinformation, which appears to be focused on soliciting further opposition to the state community hunts. In this era where “alternative facts” and falsehoods are commonly deployed to advance political agendas, the Ahtna Intertribal Resource Commission seeks to clarify the actual facts associated with the state community harvest hunts.

State and federal community harvest systems recognize in regulations the customary and traditional patterns of harvest and use that have been validated consistently through several decades of scientific research. ADF&G research demonstrates that in rural Alaskan communities, on average 30% of a community's households often provide 70% of a total communities' wild food harvests (see ADF&G's pamphlet, “Alaska's Economies and Subsistence”). We understand that for whatever reasons, the fact that these well-documented community patterns of hunting, fishing, harvesting, and sharing are quite



different than the prototypical Euro-American focus on individualism where one hunter hunts one bag limit for one family's uses with one individual permit, both the Alaska Legislature and the US Congress recognized that community patterns of use also exist and should be reflected in state and federal subsistence regulations.

The Alaska Outdoor Council, and by association their litigation funding organization, "The Alaska Fish and Wildlife Conservation Fund," state that the Board of Game's actions to provide a community hunt for moose and caribou in the Copper Basin were found to be unconstitutional.

However, this is not true. In 2018, the Alaska Supreme Court ruled:

"We upheld the bifurcated hunt system on the basis that the community harvest permit system applied equally to all Alaska citizens and thus did not implicate equal protection or the equal access clauses...and was not a sufficient bar to access to implicate constitutional rights" *Manning v. State Dep't of Fish & Game*, 420 P.3d 1270, 1279 (Alaska 2018) (citing *Alaska Fish & Wildlife Conservation Fund v. State*, 347 P.3d 97, 102-03 (Alaska 2015)).

The Alaska Supreme Court continued:

"We reiterated this holding a few months later in Manning II. In that case, we expressly rejected Manning's argument 'that the community harvest permit eligibility criteria are unconstitutional' under the equal protection and equal access clauses, noting that 'we [had] upheld the constitutionality of these criteria in AFWCF.'" *Manning v. State Dep't of Fish & Game*, 420 P.3d 1270, 1280 (Alaska 2018).

The Alaska Supreme Court relied on an earlier case filed by the Alaska Fish and Wildlife Conservation Fund (AFWCF), otherwise referred to in 2015 court documents as "The Fund." In 2015, the Alaska Supreme Court ruled,

"The Fund argues that the community harvest permit system is unconstitutional because it creates classifications that result in disparate treatment of Alaskans who are otherwise similarly situated. The superior court rejected this argument, reasoning that '[a]ny Alaskan is eligible to participate in either opportunity [i.e., the individual hunt or the community harvest] by complying with the regulatory requirements for each.' We agree." *Alaska Fish & Wildlife Conservation Fund v. State*, 347 P.3d 97, 102 (Alaska 2015).

The State of Alaska's subsistence priority statute (AS 16.05.258) obligates the Alaska Board of Game to provide for reasonable opportunities for customary and traditional uses of moose and caribou in the Copper Basin. The state's statutory obligations may not be met simply by relying on fundamentally different federal subsistence hunting opportunities that are limited to federally qualified rural residents, especially given that there are relatively few federal lands in Unit 13 (approximately 12% according to OSM staff analysis on WSA20-03, p. 4), and federal opportunities are limited to only certain federal public lands in the area involved with the community subsistence harvest hunt area regulations.

The proponent's contention that the original request to the BOG to create a community subsistence harvest hunt area on state lands is now achieved through the newly established federal community



harvest system on federal public lands is incorrect as outlined above. The BOG has separate obligations under state law to provide a reasonable opportunity for subsistence, and the BOG has appropriately determined that the CSH is necessary to meet that obligation.

The proponent misleadingly states that the federal subsistence management program "...allows for Ahtna Intertribal Resource Commission (AITRC) to achieve their goal of exclusive community member moose and caribou hunts on federal lands in Units 11, 12, and 13." That is also false. The newly established federal community harvest system is open to all eligible federally qualified rural residents living in the Census Designated Places surrounding the eight Ahtna communities and provides the same opportunities already available to those qualified rural residents under the individual federal caribou and moose hunting permits. Finally, as clarified above, the BOG must adhere to the state subsistence law found in AS 16.05.258 and cannot ignore their obligations to provide reasonable opportunities for customary and traditional uses by relying on different opportunities provided by the Federal Subsistence Board.

Alaska Statute 16.05.330(c) is clear: "The Board of Fisheries and the Board of Game may adopt regulations providing for the issuance and expiration of subsistence permits for areas, villages, communities, groups, or individuals as needed for authorizing, regulating, and monitoring the subsistence harvest of fish and game. The boards *shall* adopt these regulations when the subsistence preference requires a reduction in the harvest of a fish stock or game population by non-subsistence users" (emphasis added).

As noted above, if the BOG adopts Proposals 211 or 244, a reasonable opportunity for the community pattern of use, as defined by the Board, will no longer be provided. This suggests that the whole of Unit 13 would need to go back to a Tier II status for moose and caribou, worsening the user conflicts in Unit 13.

**Proposal 212 - Clarify the Unit 13 Tier I subsistence caribou permit condition that members of a household may not hunt caribou or moose in any other state hunts in other locations**

Ahtna supports this proposal. The public should be able to have a clear understanding over the conditions associated with the CSH.

Federally qualified hunters are still limited to one moose per person, whether they take it under state or federal regulations.

**Proposal 213 - Remove the requirement for Tier I caribou hunters to hunt moose in Unit 13**

Ahtna supports this proposal. In its comments, ADF&G may be correct that there will be more caribou hunters because of this proposal passing. However, this proposal will likely ease pressure on moose hunting in the region, as moose hunters will have the option of hunting outside of Unit 13. From a subsistence standpoint, moose are a more predictable resource for food security because the populations and locations are more consistent from year to year. Large numbers of Copper Basin residents currently must compete with hunters from throughout Alaska for a small number of moose.



The narrow range in which the population objectives fall for Nelchina Caribou Herd management results in a surplus of animals that should be made available for harvest, without the onus of a regulatory requirement that negatively impacts moose population.

In its 2018 comments on a similar proposal (Proposal 99), ADF&G made the following observation: "The draw hunt, which now provides up to 5,000 hunters annually an opportunity to hunt Nelchina caribou in Unit 13 without the restrictions on hunting big game throughout the rest of the state, would no longer be necessary." By eliminating the need for drawing-permit hunts for residents, this proposal will reduce regulatory complexity.

### **Proposal 214 – Eliminate all moose drawing permit hunts in Unit 13**

We support Proposal 214 with modification, based on a review of the data, to only eliminate the DM335-DM339 nonresident draw hunts.

Alaska State law specifies that subsistence uses have priority over other uses of fish and wildlife. As it is, quotas for the CSH are lower than they should be, given that they were adopted based on the eight villages that were originally eligible to participate in the CSH. As a result, nonresident drawing hunt opportunities should not be allowed to continue while Alaska residents' needs are not being met and are not realizing the full regulatory season due to frequent early closures.

This modification will still allow for residents to apply for draw permits.

### **Proposal 215 – Reauthorize the antlerless moose seasons in Unit 13A**

Ahtna opposes Proposal 215. The bull-cow ratio is currently at management objectives. The harvest objective is below the management objectives.

Currently, the moose population is estimated at 88 animals above the midpoint of management objectives. However, because we do not know the standard error for this estimate, it is not clear that moose populations are *significantly* above the midpoint of management objectives, as directed by the BOG. There was no reported data on the twinning rates to indicate that the habitat cannot sustain the current population. Environmental factors, such as heavy snow, could easily reduce the population to within or below management objectives within a single year.

It appears that these cow hunts are being used as a tool to keep within the bull-cow ratio while maintaining current levels of bull harvest; if there is no indication that habitat is declining, there should be no actions taken.

Although subsistence is supposed to have priority allocation, there are currently no subsistence hunts for antlerless moose in Unit 13.

Finally, we are concerned that these cow hunts may create a conservation concern that could result in restrictions on ceremonial moose harvests.



### **216 – Establish an antlerless season in Unit 13C**

Ahtna is opposed to Proposal 216. Although moose are currently above management objectives in Unit 13C, they are still at approximately the proper bull-cow ratio. However, according to the ADF&G Area Biologist, the cow-calf ratio is low (12:100 rather than the objective of 30:100).

Because this would be an antlerless hunt drawing permit, it would only provide for non-subsistence uses. Rather than creating a new antlerless hunt in Unit 13C, the Board should instead increase its any-bull allocation to the Community Subsistence Hunt. This would help to ensure that subsistence needs are being met, while also addressing any concerns ADF&G may have about moose populations being above management objectives.

There was no reported data on the twinning rates to indicate that the habitat cannot sustain the current population. Environmental factors, such as heavy snow, could easily reduce the population to within or below management objectives within a single year.

It appears that these cow hunts are being used as a tool to keep within the bull-cow ratio while maintaining current levels of bull harvest; if there is no indication that habitat is declining, there should be no actions taken.

### **217 – Eliminate all caribou drawing permit hunts in Unit 13**

Ahtna supports this proposal. In 2020, ADF&G closed the Community Subsistence Hunt, failing to provide reasonable opportunity for subsistence. This is despite the fact that the BOG stated in its 2015-2019-BOG finding to keep the Copper Basin community subsistence caribou hunt open for the entire season or until the community subsistence caribou quota has been met, whichever occurs first. Eliminating non-subsistence opportunities would be a positive step toward meeting these goals.

### **218 – Increase bag limit for brown bear in Unit 13**

Ahtna is strongly opposed to this proposal. No data have been presented to signify that the population can withstand an increase in the bag limit to two brown bears per year. The State of Alaska's aerial surveys will be done in 2022. ADF&G, AITRC and Ahtna are currently working on a study on bear density that will be completed in 2023.

### **219 – Modify the Unit 13 predation control program**

Ahtna supports Proposal 219, which would add intensive management to Unit 13D. This would be an important tool for managers seeking to ensure healthy ungulate populations in the area. Currently there are wolf refugia in both Wrangell St. Elias and Denali National Parks. As a result, there are plenty of places in the broader landscape for wolf populations to remain strong. There are also areas within 13D that provide refugia as it is difficult to access via plane.



### **220 – Close moose and wolf hunting within Unit 13A**

Ahtna strongly opposes Proposal 220. There are triggers for when intensive management happens. Currently, population, harvest, and bull-cow-ratio are all within management objectives. Moreover, this would close the Community Subsistence Hunt and take away subsistence opportunity.

This proposal would simply shift hunting to other areas, causing hunting pressure to increase in those areas.

### **221 – Align otter and beaver trapping seasons in Unit 13**

Ahtna opposes Proposal 221. Otter pelts are not as good as late in the season as beaver pelts are. Additionally, otters are already carrying and having kits at this time of year. As a result, this proposal could impact otter production.

### **222 – Align the ptarmigan hunting season for all of Unit 13 and reduce the bag limit to five per day**

Ahtna sees no reason to adopt Proposal 222. Ptarmigan seasons were just changed during the last regulatory cycle for conservation reasons. It is important to keep the seasons consistent, rather than changing them every three years.

Respectfully,

Nicholas Jackson, Chair  
Customary & Traditional Committee  
Ahtna, Incorporated



## 2021-2022 Board of Game Proposals: Proposal 199

Alaska Frontier Trappers Association opposes Proposal 199 and requests that the Board of Game reject this proposal for the following reasons:

1. Proposal 199 is political stunt by the Alaska Wildlife Alliance, who submitted this proposal. This organization has published their goals of ecosystem wildlife management, which are in direct opposition to the constitutionally protected rights of all Alaskans according to the Alaska Constitution-Section VIII. We believe this poorly concealed attack on Alaskan voters is based on an intentionally false premise of protecting people and pets.
2. This proposal is asking for changes to trapping regulations for the purpose of protecting people and pets without demonstrating the risk trapping activities pose. The entire justification for limiting trapping is centered around the risk trapping poses. There is an obvious lack of evidence and analysis completed by the author of this proposal to demonstrate that trapping activities somehow increase the risk to other trail users versus another user group. Of the five examples of pet / trap conflict provided, three were not even on the list of trails in this proposal so this proposal would be ineffective at minimizing these unfortunate events. Also, there is no mention whether these animals were on or off a leash at the time of the incidents. Leashes have been proven to minimize trapping related conflict. Allowing off leash animals to roam would negate the benefit of this proposal and is in violation of borough code in some areas. The person / snare conflict is in an area where there are 100s of, often narrow, trails winding through gravel bars and woods with no clear path, adjacent to the Kink River. This area is frequented by 100s of motorized trail users and numerous non-trapping related accidents occur in this area every year due to collisions with vegetation, other motorized users and the terrain itself. Overall, the examples provided lack details and are skewed to promote an agenda. We consider the entire premise false and manipulative.

There is always risk associated with recreating in remote and semi-remote areas of South-Central Alaska, especially in the Winter. Alaska Frontier Trappers Association's position is that trapping activities have a positive impact on outdoor safety simply because of the increased likelihood of a trapper coming along to assist people stranded, lost, or otherwise in trouble in these remote areas. We can provide numerous accounts of this very occurrence. Trappers are the reason many trails in Alaska exist and continue to be maintained. Trappers also continue to be a safety net for many "recreational" users of these trails as they are often the first responders to accidents on recreational trails. While recreationalists may travel a trail or two, a few times a year; trappers are traveling these trails day-in and day-out throughout the winter. Trappers and trapping activity reduce the overall risk for others recreating on trails in South-Central Alaska.

3. The proposal is a thoughtless approach to restricting trapping along miles of trails in South-Central Alaska. By the Alaska Wildlife Alliance's own admission, the included list of trails was pulled directly from the Matsu Boroughs trail planning list. They provided no consideration of the frequency the public is using these trails, unbiased surveys, or any detailed analysis on the

types of public user groups on specific trail sections where pet / trap interactions are claimed to be occurring. For example, one trail listed (13A, Crosswind Trail System) in this proposal is pictured here on January 1, 2022.



An Alaska Frontier Trappers Association member has been the only user of this trail since the snow fell in November 2021. He is trapping along a portion of this trail. Claims that these are frequently used during the trapping season by multiple users is clearly not accurate along all the trails listed. Without additional unbiased research on trail-use and frequency of pet /trap interactions, justifying the inclusion of over 200 trails in South-Central Alaska into this trapping restriction proposal presented by the Alaska Wildlife Alliance is not in the best interest of Alaskans or of wildlife.

4. Enforcement issues: If this regulation is adopted, the Board of Game will be asking trappers and Wildlife Enforcement Officers to measure from an unknown point. These trails are like watercourses and frequently move back and forth along a general route of travel. Many of them are unmarked or infrequently marked so trappers and Wildlife Troopers would have to guess how far 50 yards is from the trail edge. If the packed portion of the trail moves over the course of the Winter (i.e., in open areas), the trapper could be at fault unless they are constantly measuring and adjusting trap locations based on infrequent traffic. The trappers only option would be to move well beyond 50 yards or forgo trapping along the trail entirely. This unjustified burden would be placed on Wildlife Troopers and Trappers due to the possibility that



another recreationalist many decide to use the trail (frequently packed and maintained by the trappers themselves) during the course of the winter.

5. Ignorance of Wildlife Behavior and Trapping Techniques: This proposal also demonstrates the lack of understanding regarding wildlife in general and of trapping techniques in South-Central Alaska. As the snow depth increases, wildlife frequently follow packed trails in the snow created by trappers and other recreational users. This is especially true of predatory furbearers. Moving traps and snares 50 yards off the path of travel on many remote trails will impact the trapper's ability to effectively harvest these animals without the use of large amounts of bait or lure to draw animals off the primary trail. These baits and lures will also draw non-target catches such as pets from trails as well. This negates the purpose for this regulation in the first place.

Conclusion: Proposal 199 unfairly prohibits one trail user group over a claim that they negatively impact other users. The proposal indicates that all forms of trapping create safety hazards along multi-use trails which is just not true. The proposal also lacks evidence and is full of ulterior motives. The very definition of multi-use trails means that many methods of travel and types of activities occur on these trails. Restricting trapping based off an opinion and unsubstantiated claims is not an effective management practice. This proposal should be promptly rejected. Alaska Frontier Trappers Association believes that educating both trappers and outdoor recreationalists is the best way to minimize conflict. This will provide opportunities to all Alaskans to enjoy and benefit from the great outdoors!



Submitted By  
Rod Arno  
Submitted On  
1/7/2022 2:00:54 PM  
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Alaska Outdoor Council

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The Alaska Outdoor Council written position on select Board of Game proposals for the Central&Southwest Region.

Proposal 198. Oppose.

Proposal 199. Oppose

Proposal 201. Support

Proposal 23. Support

Proposal 32. Oppose

Proposal 211. Support. Don't make it where you have to have 24 other folk in your group to have a responsible opportunity to hunt an any bull moose in GMU 13. Sharing is a hunting tradition.

Proposal 217. Oppose.

Proposal 214. Oppose

Proposal 62. Support

Proposal 75. Oppose

Proposal 224. Support with amendment. Reduce the up to harvest of antlerless moose to 1,000.

Proposal 226. Support. It's still only up to language, the department can stop whining.

Proposal 86. Support. Correcting this all wrong will help with future Dall sheep allocation.

I will be available to attend the board meeting should board members have any questions. Thank you for your time and contributing to the state's regulatory process of harvesting game.

Rod Arno. Alaska Outdoor Council



Submitted By  
Thor Stacey  
Submitted On  
1/7/2022 4:08:06 PM  
Affiliation  
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January 7, 2022

Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the January meeting in Wasilla. The APHA's members rely on fair and predictable allocation to non-resident hunters based on defensible biological parameters that are in line with the principles of sustained yield and result in a maximum benefit to ALL users. APHA maintains its support of the Board's current allocative policies and believes that the well defined, species specific, resident preferences are in the best interests of all Alaskans.

### **Guided Hunt Allocation Benefits Resident Hunters, Visiting Hunters, Guides & Non-hunters**

APHA commissioned its first socioeconomic report with the McDowell Group in 2014, titled *"Economic Impacts of Guided Hunting in Alaska."* More recently (2019), APHA partnered with Dallas Safari Club to add to and update McDowell's 2014 seminal work. *"The Economic Importance of Hunters Visiting Alaska; Alaska's Guided Hunting Industry 2019"* provides new information on funding for conservation that our visiting clients contribute to wildlife management. Guiding hunters is primarily an activity that occurs in rural areas of Alaska.

<ul style="list-style-type: none"> <li>91.8 Million total economic output (2019)</li> </ul>	<ul style="list-style-type: none"> <li>57.4 Million <b>new</b> dollars to Alaska (2019)</li> </ul>
<ul style="list-style-type: none"> <li>59% of guide industry spending occurs in <b>rural</b> areas (2019)</li> </ul>	<ul style="list-style-type: none"> <li>1,380 people directly employed, total employment with multipliers; 1,890 (2019)</li> </ul>
<ul style="list-style-type: none"> <li>85% Active Guides are AK Residents (2019)</li> </ul>	<ul style="list-style-type: none"> <li>Visiting hunters (guided &amp; non-guided) purchase 14% of total Alaska hunting licenses (2019)</li> </ul>
<ul style="list-style-type: none"> <li>Guided hunters are approx. 3% of total hunters in the field (2019)</li> </ul>	<ul style="list-style-type: none"> <li>Visiting hunters (guided &amp; non-guided) contribute 76% of total revenue to the ADFG wildlife conservation fund (2019)</li> </ul>

### **Significance to Alaskans & Meat Sharing**

Guiding hunters in Alaska has its origins in Territorial days. Because of our rich history, guides have deep roots in communities across Alaska, with many guides living in remote communities or “Bush Alaska.” APHA worked with McDowell to quantify what some of the benefits that Alaskans reap from Guided Hunting. In 2019, 31.9 million new dollars went to Alaska business that were directly attributed to Guided Hunting. This generated another 19.1 million in economic activity in the support sector. Hunting guides do what they can to share the harvest; 223,500 lbs of well cared for, high quality game meat was shared with their fellow Alaskans in 2019.

## Individual Proposal Comments

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

### Proposal 7- SUPPORT

APHA supports Prop. 7 based on ADFG staff reports and comments that implementation will likely not increase overall harvest or cause a conservation concern. Prop. 7 offers some additional harvest opportunity that analysis shows to be sustainable so it should be adopted.

### Proposal 198- OPPOSE

APHA opposes creating bear baiting closed areas within 50 miles of “cabins.” Passage of Prop. 198 would create a dangerous precedent where private landowners essentially veto hunting opportunity on public lands. This precedent would fly in the face of the public trust doctrine Alaska's wildlife is managed under to the great expense of hunters and wildlife conservation in the state.

### Proposal 13- SUPPORT

APHA supports ADFG proposal 13 for the reasons stated in the proposal. Moose populations are growing in Unit 17 A and expanding to additional units. Management objectives are being met however failure to pass Prop. 13 could put management objectives at risk. We note that a similar proposal was not adopted during the last cycle. We are grateful to ADFG staff for continuing to monitor and survey moose in 17 A with the end result being this proposal to increase harvest in 17A.

### Proposal 28- OPPOSE

APHA opposes the broad relaxation of the historically successful “one brown bear every four year” bag limit in GMU 9.

#### Background:

During the cycle APHA supported shortening brown bear seasons in much of GMU 9 based on stated conservation concerns by the department. Shortening the season resulted in less opportunity to guide brown bear hunters and thus reduced guide business profitability. APHA remains supportive of close monitoring of the brown bear population in GMU 9, especially the southern portion where most of the concerning harvest trends were identified. Neither GMU 9 guides or APHA has offered a proposal to lengthen the season and regain lost hunting opportunity for both resident and non- resident hunters as we remain cautious based on recent department conservation concerns.

#### Resident Annual Seasons:

*“Residents may also hunt bears near towns and villages of Unit 9 with a RB525 registration permit with no closed season and a 1 bear per year bag limit. There is also a subsistence brown bear registration hunt in Unit 9B from September 1 – May 31, and a subsistence brown bear registration hunt in a portion of Unit 9E from November 1 – December 31; both have a bag limit of one bear per year.”* ADFG Staff Comments- CSWR 2021

#### Conservation Concerns:

Department staff provided an analysis based solely on expected overall harvest. APHA members expressed concerns that opening up the general season to one bear every year would cause hunters to be less selective and more willing to take smaller boars or female bears. These observations and concerns about human selectivity and behavior are based on literally thousands of cumulative days in the field guiding clients who are restricted to either one bear or sheep every four years. Guided experience has shown hunters are more likely to be selective if than cannot simply return next year to “get a bigger one.” Sow harvest is closely managed in other areas of the state operating under bear management plans because high rates of sow harvest can have cascading, negative effects on bear

population fecundity. APHA is concerned that new conservation concerns could arise from a bag limit change that results broadly in increased sow harvest, even if total harvest number projections by the department are accurate.



#### Human Wildlife Conflicts/Subsistence:

Current “one bear a year” bag limits for residents close to communities or for subsistence are more than adequate to provide for bears as a food source or to alleviate human/bear conflicts near communities.

#### Summary:

Current bag limits and seasons for resident and non-residents in GMU 9 are working well. Resident sport hunters can harvest a large coastal brown bear in GMU 9 every four years. Harvest of boars:sows is reasonable and appears sustainable. Subsistence hunting opportunity is ample, with long seasons and liberal bag limits. Seasons were recently shortened in southern GMU 9 as a precaution but guide businesses remain viable. APHA opposes altering the highly successful “one bear every four years bag limit” for residents because we fear the possibility of increased sow or young boar harvest occurring thus reducing the overall harvestable surplus that will ultimately lead to a reduction in opportunity.

#### **Proposal 205- SUPPORT**

#### **Proposal 206- OPPOSE**

APHA opposes the variety of ways Prop. 206 seeks to increase harvest and reallocate bears in GMU 9. APHA encourages the board to fail all aspects of this proposal for the stated conservation reasons expressed by the Department. However, the department is concerningly neutral on lengthening the season for residents even as they admit that increased harvest will have to be monitored closely and may lead to conservation problems.

#### Background:

ADFG began flagging what they viewed as troubling bear harvest data in 2012 according to comments filed for this meeting and the last cycle meeting in Dillingham. Leading up to the Dillingham meeting APHA members were also concerned about bear numbers in southern GMU 9 and we were prepared to work towards a conservation oriented solution with the board and members of the public to address conservation concerns at the Dillingham meeting. Ultimately APHA supported shortening the season for both resident and non-resident hunters to reduce harvest. This was after many options were considered and over the legitimate objections of some individual guides.

One of the options that was considered and ultimately rejected by the board was keeping resident seasons longer and only shortening non-resident seasons. This option is discussed and greater length in the remainder of our comments on Prop. 206.

#### Commercial Use Considerations:

Non-resident hunters must overcome economic barriers to hunt brown bears in GMU 9 because they are required to hire a guide. Resident hunters also must overcome economic concerns, albeit smaller in magnitude, to hunt GMU 9 bears because anecdotally most resident use either an on demand air carrier or license air transporter.

Non-resident pay \$1000 for a bear tag while resident pay \$25 for a bear tag. Guided hunts average close to \$30,000 while transported hunters average \$3-4000 for their services.

It is important to consider commercial use impacts of de-coupling GMU 9 resident and non-resident hunter seasons. Commercial use and market forces are NOT considered in their comments on Prop. 206 or any other comment but play an important role on projecting hunter participation. First, obtaining a transporter license requires an air taxi merely pay a fee and report use to the Big Game Commercial Services Board (BGCSB). Second, it would be a unique situation in Alaska and offer transporters in the area the ability to advertise an advantage on paper. This advantage would likely increase demand, increase hunter participation and increase harvest- exactly what the department opposes at this time. Second, transporters are empowered by their license to charge above and beyond their air charter rare-transporters can sell Alaska big game. The interplay between increased demand for “resident only season,” the ease of obtaining a transporter license and the ability to charge above and beyond normal charter rates may disadvantage the average Alaskan hunter desiring to hunt bears in GMU 9. Absent staff analysis of impacts on hunter effort by creating a new commercial market for bear hunting in GMU 9 the board can look at a few other isolated cases where transporters took over market share.

In NW Alaska GMU 23 and 26A transported caribou hunts became popular. Remember caribou are not a guide required species so the market for caribou hunts extended to both resident and non-resident hunters. Community conflicts over meat care became rampant in the late 2000s according to a legislative audit and Big Game Commercial Services Board investigation. During this time the burden on enforcement (cost to the state) was increased significantly as a result. Conflicts between transported hunters were also common as well as trespass concerns. Unlike guides who are responsible for knowing hunter land status, game laws and who can lose federal concessions for conflicts, transporters are not responsible for violations of their clients in the field nor are they responsible for education their clients as to land status or any other aspect of hunting laws. Transporters are allowed to charge a premium for the use of the resource but have limited, if any real accountability beyond reporting the numbers of clients dropped off. Caribou hunts in GMU 23 and 26A are currently under consideration to close for all non- federally qualified users to include resident Alaskan hunters. While the decline in caribou numbers is not attributed to human harvest the conflicts and compliance issues originating from a segment of the transporter industry in the area has

not helped as collaborative solutions are needed to address social and conservation concerns. Real impacts to hunter access have occurred as evidenced by large closures of river corridors as conflict mitigation measures. All in all, a frustration story.



Lodges offering transportation services in SE Alaska began to chisel out a dominate market share of the non-resident and resident black bear hunters in GMU 2 & 3. Hunter effort rose as did similar conflicts in the field to the caribou hunts in NW Alaska. However in GMU 2&3 conservation concerns began to arise based on increased harvest from a higher volume of black bear hunters. The board was compelled to

address these conservation efforts by putting non-guided (transported) hunters on draw in these areas. In this case bear conservation concerns were created as transporters increasingly exploited long seasons and generous opportunity.

Lengthening only the resident season in GMU9 will create a new, niche market for transporters. Social impacts in the form of conflicts in the field, tress pass and game violations will require an increased enforcement presence. Additional harvest will result and conservation concerns are likely to be compounded or new ones created. Because transporters are not limited like guides on federal land areas, it is hard to predict what the increased use will look like but bit the NW Alaska caribou example and the SE Alaska black bear example that both ultimately led to reduced hunting opportunity and more division within user groups. GMU 9 bear populations are sustainable but additional harvest is not warranted at this time. The proponent of Prop 206 identifies conflicts in the field as an issue, its hard to imagine how adding an additional commercial opportunity will alleviate them.

#### Harvest Allocation and Access:

Prop. 206 is proposed as an way increase resident harvest where guided non-residents take the larger share of the harvest. The department addresses harvest rates in their comments:

*"The reason that nonresident hunters harvest the majority of bears taken in Unit 9 is not because guides out-compete resident hunters, but rather because of low participation by resident hunters. Hunting the Alaska Peninsula is expensive for non-local residents, and very few non-local resident hunters harvest more than one brown bear in Unit 9." ADFG Staff CSWR- 2021*

If resident hunter effort and interest in bear hunting in GMU 9 substantially increases in the future it might be appropriate to reapproach resident/non-resident harvest disparity. As of now, resident hunters do not need to draw a tag and can hunt unfettered during the open seasons. Harvest rate disparities are the result of a lack of resident hunter interest in bear hunting in GMU 9.

#### Summary:

APHA opposes Prop. 206 in its entirety. Historic management decisions to address bear population depletions have worked and continue to work well. Alternating year spring and fall seasons has proven to be an effective conservation tool as has limiting bag limits to one coastal brown to every four years. Maintaining the course with the goal of eventually lengthening the seasons for both resident and non-residents once the bear population returns to pre-2012 levels makes sense.

#### **Proposal 207- OPPOSE**

APHA opposes closing brown bear seasons in GMU 9A. The bear population in GMU 9A is healthy and harvest levels are sustainable.

#### **Proposal 208- SUPPORT**

APHA supports aligning hunting seasons in GMU 9C with GMU 9A&B. Much discussion about GMU 9 bears occurred during the last meeting in Dillingham. Initially bear seasons in all of GMU 9 were shortened. Staff analysis and work with the public resulted in reverting to longer seasons in GMU 9 A&B in 2019. Unfortunately GMU 9C was left out even though it became apparent after seasons were reverted in GMU 9 A&B that 9C bear populations are healthy with much of the sub-unit not hunted at all. Bear seasons in GMU 9C should be aligned with GMU 9 A&B instead of GMU 9 D&E.

#### **Proposal 51 & 209- SUPPORT- AMMEND**

APHA supports Prop. 51 and 209 but asks that the board incorporate the Departments suggestions on simplified unit boundaries.

#### **Proposal 68- OPPOSE**

APHA opposes Prop. 68 because members caution that grizzly bear populations in Unit 11 are not at historic high levels.

#### **Proposal 69 & 218- OPPOSE**

APHA opposes Prop. 69 based on the Departments state conservation concerns.

#### **Proposals 214 & 217- OPPOSE**

APHA opposes Prop. 214 & 217 because they would completely eliminate the hunt structure used to manage non-resident participation in moose and caribou hunts in GMU 13. Current hunt opportunities are resulting subsistence harvests in excess of ANS. Non-resident opportunities are capped with "up-to" tag allocations depending on the available harvestable surplus. Removing "up-to" 200 non-resident caribou tags and "up-to" 150 non-resident moose tags is unwarranted and takes a tool out of the toolbox to provide legal and important non-resident hunter opportunity in GMU 13.



**Proposal 219- SUPPORT**

APHA supports the Departments efforts to manage moose in GMU 13D so that they do not "*reach a low-density-dynamic-equilibrium mediated by predation.*" *ADFG CSWR Staff Comments- 2021*

**Proposal 220- OPPOSE**

**Proposal 86- SUPPORT**

We support Prop. 79 based the stated conservation objectives. The Matsu AC makes it clear that its intention is to rebuild the old ram cohort to eventually allow for less restrictive hunt structures then the current drawing hunt. We encourage the Board to work towards the stated goal of this proposal and rebuild the old ram component in 14A with the eventual goal of managing harvest via registration hunt.

**Proposal 95 & 92- SUPPORT**

Proposal 95 & 92 will provide more hunting opportunity for healthy bear populations in GMU 16 and 13 but will not create an identified conservation concern. APHA supports providing more sustainable hunting opportunity.

**Proposal 223- SUPPORT**

**ALASKA RANGE TRAPPING SUPPLY****12131 HORSESHOE DRIVE EAGLE RIVER, AK 99577****907-726-7567**

**Gentleman:**

**I am the general manager for Alaska Range Trapping Supply, the only full line trapping store in the state of Alaska. I deal with and talk to a great many of the people trapping in the state. Since the time your two proposals, 100 and 8 were released I have talked to most of my customers about the changes being considered .**

**Most agree that proposal # 100 is worthwhile as we all have to deal with water fluctuations but try very hard to comply with the law.**

**When it comes to proposal # 8, it is an entirely different story. No one can understand the shorting of the season on coyotes in areas where they are so plentiful that under the hunting regulations you are allowed to kill them the through the entire year and are not required to even salvage the fur.**

**Thank you for allowing me to express the feeling of the trapping community.**

**Jim Portch**

**General Manager**

**Alaska Range Trapping**



***Alaska Trappers Association  
PO Box 82177  
Fairbanks, AK 99708***

Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811  
ATTN: BOG COMMENTS

January 5, 2022

Dear Chairman and Members of the Board:

On behalf of over 1000 members of the Alaska Trappers Association, we wish to share our opinions on the supplemental proposals for the Central and Southwest areas which you will be considering at your January meeting in Wasilla.

**Proposal 199**

This proposal is unwieldy, unnecessary and would be cumbersome to enforce. It would eliminate a lot of trapping opportunity where there is no compelling reason to do so. ATA does not support the careless use of traps anywhere, and puts a lot of effort into educating new and young "wanna be" trappers on the dangers of inappropriate and poorly located traps. There is a lot of safe trapping that can happen within the limits of this proposal. Under ice, under water, elevated and enclosed traps can be operated safely within the proposed limits. The proposal simply over reaches its stated purpose. It should not be adopted.

**Proposal 202**

ATA supports allowing the harvest of beaver by firearm in Unit 17 but maintains that trapping should remain the primary means of harvest, as stated in our Position Statement which was adopted in 2015 (enclosed). Adoption of this proposal would be another step in the standardization of beaver harvest regulation where ever warranted in the state.



### Proposal 203

Like Proposal 202, ATA supports the extension of the muskrat season in Unit 17.

### Proposal 220

ATA energetically opposes closing the moose and wolf hunting seasons in Unit 13A. This proposal appears to be based on philosophy rather than sound management. The economic, nutritional, recreational, cultural, etc. loss would simply be too great. At the end of five years we would realize that nothing had been accomplished.

### Proposal 221

ATA is opposed to extending the otter trapping season in Unit 13 to May 31. Otter fur is no longer prime by the end of May. We could support a shorter extension of the otter season if the Board were opt for that.

### Proposal 228

This is a perennial nuisance proposal that the Board has considered and rejected multiple times in the past. It offers too much opportunity for falsification and abuse, and would encourage disturbance of trap sets by people who oppose our activities. ATA remains consistently opposed to this sort of regulation, as stated in our Position Statement adopted in 2015 (enclosed).

We appreciate the opportunity to participate in the regulatory process.

Sincerely,

A handwritten signature in cursive script that reads "Randall L. Zarnke".

Randall L. Zarnke, president



## **Alaska Trappers Association Official Position Statement Firearm Harvest of Furbearers**

The Alaska Trappers Association believes that trapping and snaring should remain the primary means of harvest for furbearer species. We are not opposed to harvest of furbearers by means of firearms. However, we don't support expansion of hunting seasons to the point that harvest by firearms surpasses harvest by traps and snares. Traditional trapping and snaring should remain the primary method of harvest.

Adopted this 28<sup>th</sup> day of April, 2015

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ATA president



# **Alaska Trappers Association Official Position Statement Trap Identification Tags**

The Alaska Trappers Association does not support a requirement that identification tags be attached to traps and snares anywhere in Alaska. Proponents of this concept suggest that trap tags would reduce or eliminate trapping violations. That is idle speculation. Only law-abiding trappers would obey this new regulation. "Outlaw" trappers would ignore the requirement, as they do with other regulations. Thus, trap tags would serve no useful purpose and would place an unnecessary burden on law-abiding trappers.

In addition, tagged traps belonging to law-abiding trappers could be stolen and re-set illegally. This is not idle speculation. It happened to a member of our Board of Directors when he was trapping in the Lower 48. Fortunately, local law enforcement officials were aware of his ethical standards and normal trapping areas. He was not cited, but this incident serves as an example of how tagged traps can be used against a law-abiding trapper. Threats of similar actions have been made in recent years in Alaska.

We are also concerned about the potential for uneven enforcement throughout the State. Regulations should be enforced equally in all areas.

The Alaska Trappers Association does not support implementation of a regulation requiring identification be attached to all traps and snares.

Adopted this 28<sup>th</sup> day of April, 2015

---

ATA President



Submitted By  
Nicole Schmitt  
Submitted On  
1/7/2022 3:36:13 PM  
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## Alaska Wildlife Alliance comment on Proposal 207

Alaska Wildlife Alliance shares concerns about protecting the brown bear resource in GMU 9A, particularly in the context of this game unit linking coastal brown bear habitat between Lake Clark National Park and McNeil River State Game Sanctuary and Refuge, otherwise known as Bear Coast. Currently, this GMU is managed mainly for guides and trophy hunters. GMU 9A, with a more conservative management scheme, could balance trophy hunting and bear viewing interests, while maintaining sustained yield.

The current harvest management scheme is on the highest end of sustainable bear management (assuming the harvest continues to be skewed towards a higher take of males than females), with the harvest level bumping consistently against 9%. However, there is no inherent reason to manage right up to 9% harvest, why not manage towards 6% harvest? This would ensure sustained yield for the trophy industry, maintain opportunity for resident hunters, create a buffer for seasonal variations that impact bear populations, and bolster the growing bear viewing industry. This is a special place with world-renowned bear viewing - the Board can reduce harvest to balance all users.

Further, we agree with the proposal regarding the poor timing of hunt reports and BOG meetings in relation to this unit's management. We also share concerns about the push to liberalize hunting in the sub-unit, unless total harvest levels remain near 6%.

Finally, we are concerned that the State's last estimated population was almost 2 decades ago. Management is based on ensuring harvest is within a sustainable percentage of the total population, and therein lies the problem. The population could tank while assumptions are being made from numbers that are decades old. We recommend that estimates be done at least once every decade, if not every 5 years. Five years would be ideal, as it coincides with a bear generation; i.e., a female young-of-year cub needs approximately 5 years to enter into the reproductive cohort. Recognizing the limited capacity of the Department to run population estimates, perhaps there is an opportunity for collaboration with nonprofits or the National Park Service on data collection in the region.

## Alaska Wildlife Alliance comment on Proposal 19

Alaska Wildlife Alliance respectfully submits this comment in support of Proposal 19. We echo the agency's concerns about the declining caribou numbers and request that the Board adjust objectives to an ecologically sustainable level, with particular regard for changes in habitat quality.

## Alaska Wildlife Alliance comment on Proposal 21

Alaska Wildlife Alliance respectfully submits this comment in opposition to Proposal 21 for two reasons:

1. This proposal requires concurrence from the Department of Interior for implementation on federal lands, which has not yet been approved and is highly unlikely;
2. We challenge the department's beliefs that reducing wolf predation is effective, and that reducing wolf predation is in the best interest of subsistence users.

To the second point, Supervisory Biologist at Togiak National Wildlife Refuge, Pat Walsh, published an article in the journal *Rangifer* titled "Influence of wolf predation on population momentum of the Nushagak Peninsula caribou herd, southwestern Alaska" (<https://doi.org/10.7557/2.39.1.4455>), it essentially asks if wolf predation can be good for caribou.

Walsh laid out a fascinating ecological story. During 1997–2007, the nonmigratory caribou herd on the Nushagak Peninsula, located within Togiak Refuge, declined from 1,400 to 500 individuals. Walsh, working closely with his ADF&G and Game State colleague, James Woolington, investigated the time budgets of three wolf packs that used the peninsula during the following five years (2007–2012) to figure out if wolves were responsible for the herd's decline. During their study, wolf predation steadily increased on the caribou; however, contrary to expectations, the caribou population steadily increased as well.

These two field biologists tracked 20 GPS- and VHF-collared wolves during their study. They found that only one of three packs regularly

used the peninsula. This pack, known as the Ualik Lake pack, spent 35% of its time there. Its use of the peninsula was disproportionately high in late summer and fall, disproportionately low in winter, and proportional during the caribou calving season in early summer.



The overall wolf use of the Nushagak Peninsula increased in direct response to increasing caribou abundance. Walsh and Woolington concluded that, in this instance, wolf predation was not driving caribou population dynamics. Instead, the caribou population was the driver and wolves were simply responding to an increasingly abundant food. The Nushagak herd had previously declined, then increased, due to internal demographic factors apparently unrelated to predation (graph available in article).

Not all wolf-caribou interactions are the same, and that the geography of the Nushagak Peninsula makes this situation somewhat unique. The 800 square mile peninsula is narrow enough that this single wolf pack was able to establish its territory near the head of the peninsula, and thus defend the area from other wolves on the mainland. So, as the Nushagak caribou population increased, the Ualik Lake wolf pack spent more time preying on them, and concurrently (and ironically) spent more time protecting them from predation by other wolves.

Since the conclusion of their study in 2012, the caribou population has continued to increase to the point that habitat damage is evident. In short, high numbers of caribou may be eating themselves out of house and home. Wildlife managers have attempted to address this by increasing human harvest through several regulatory changes, but lack of snow in recent winters has prevented snowmachine access, which is the primary transport used by hunters there. We believe it possible that the Nushagak Peninsula caribou will face winter food shortages in the near future, and may simply walk away. Should this happen, local villages could lose an important subsistence resource.

Although wolf predation has not served as a very effective population control for caribou, it is certainly working in the direction of management. And to answer the question as to whether wolves can be beneficial for caribou, it appears that in this case, it could be that the protection resident wolves provide may be too much. In fact, a bit more predation might prevent degradation of caribou habitat, which could help sustain the caribou population itself.

Walsh and Woolington wrote that the principal reason they conducted their study was to assess whether wolf population control was necessary to prevent the population decline in this herd. Had predator control been instituted at the onset of this study (as requested by local management committees), it is reasonable to believe that the caribou population would have increased as it did.

However, these two seasoned biologists also point out “stakeholders might have incorrectly concluded that wolf control caused the caribou population response.” This case illustrates the importance of careful thought and having sufficient data for both ungulate and predator populations before invoking predator control.

## Alaska Wildlife Alliance comment on Proposal 199

Alaska Wildlife Alliance respectfully submits this comment in support of Proposal 199. In addition to the rationale outlined in the proposal, we offer the following considerations:

- As you are aware, no department or agency is tracking trap encounters in a consolidated manner. Each year, Alaska Wildlife Alliance receives many calls from Alaskans who had run-ins with traps while recreating. We always encourage folks to report these incidents with AWT and ADF&G, but since those departments don't track this information, we also sought to understand the context around these encounters. So, during the 2020-21 trapping season, we opened a form on our website for people to submit information about trap encounters. We consolidated this information into a Map the Trap report, available on our website.

During the 2020-2021 trapping season we found that, of the trap encounters reported statewide, 69% of them were located in recreational areas, which include hiking trails, snow machining trails, and mushing trails. The remaining 31% of encounters were found along roads, highways, and parking lots. For encounters with reported distances from trails and roadways, 80% were reported within 100 feet (~ 33 yards) of a trail or road. Of the Alaskans who saw an animal in a trap while recreating and reported it on the survey, 23% of those trapped animals were dogs. But dogs weren't the only ones impacted. One person nearly stepped in a body grip trap set near a street light off of Parks Highway; another reported a snare four feet off a plowed road in Fairbanks; and one man was pulled off his motorbike after a snare caught his foot while he was riding in the Jim Creek Recreational Area. The true extent of trap encounters with other recreationalists is unknown because no agency, including ADF&G, has been responsible for tracking these events. Our survey likely underestimates encounters because we did not widely advertise the survey. ADF&G stated in their comments that they do not keep any records to know when, where, and how many pets (or humans) are caught in traps, but do acknowledge they are aware of incidents in GMUs 14 A and B where pets have been caught near multi-use trails and trailheads.

- It is reasonable to conclude that the issue of trail-side traps has been frequent enough, and occurring long enough, to warrant ADF&G utilizing resources to develop a brochure in 2014 entitled “Trap Safety for Pet Owners” plus a series of videos demonstrating how to release a pet from various traps. Alaska Trappers Association also developed a lengthy video, the content of which “was largely dictated by some of the comments [they've] heard over the years from people who have had dogs and cats caught.” In short, trap conflicts exist and are acknowledged by the Department and by ATA. Historically, the Board of Game has put the onus of trail safety entirely on the 728,045 Alaskans who do not trap. Conflicts have continued even after the brochures and videos; the status quo is not working.
- In 2017, the Mat Su Borough Assembly was presented with a petition that included 3,568 signatures by Mat Su Borough residents requesting trap setbacks on local trails (<https://www.matsugov.us/news/assembly-bans-trapping-in-7-parks>). For scale, more people in the Mat-Su Borough signed that petition than there are trappers in Alaska. Despite their interest, the Borough could not issue setbacks on trails under the Board of Game's purview. Please consider this proposal an opportunity for this Board to strike a

reasonable compromise between trappers and thousands of hikers, skiers, hunters, and mushers requesting setbacks.



- Regarding the concerns that this proposal would be too difficult to regulate, we remind the Board that similar regulations exist in Juneau (made by this Board) and in Anchorage (made by the Municipality). The concerns brought forth in the ADF&G and AWT comments on Proposal 199 regarding enforcement may be remedied by agreeing to what AWT refers to as “a proper publicly accessible map.” Again, a similar management scheme has been in place in Juneau for over 10 years, it can be replicated here.
- Once again, the goal of this proposal is not to end or unduly restrict trapping. We acknowledge that many trails in the MSB were established by trappers, but over time the use of those trails has diversified. All of the trails listed in this proposal are designated in comprehensive trails management plans as being regularly maintained and enjoyed for multi-use. The Mat Su Borough population has increased by 20% in the last ten years, and recreation is increasing too. Things change, and regulations need to keep up with those changes.

We do not seek to put a setback on every trail in the Mat-Su area, only the trails that are most utilized and maintained for multi-use, such as the Iditarod trail, Iron Dog connectors, Nancy Lakes trail, and the Ski Hill and Su Valley ski trails. ADF&G even acknowledges the multi-use nature of these trails in their comments. By selecting only the most utilized and popular trails for this proposal, primitive or trapper-maintained trails would not be restricted by setbacks. Again, this proposal only prohibits traps on or next to trails where people are running dog teams, skiing, hiking, or hunting – are those areas where we want unmarked trailside traps? We respect the rights of trappers to utilize multi-use trails, but allowing traps on or right next to trails that are maintained for multi-use recreation is not reasonable.

- Some may interpret this proposal as an affront to trapping, but it’s important to note that this proposal asks for very little. Trapping seasons are open as early as September and can go through May. That’s at least half the year, in places three quarters of the year. In their brochure, ADF&G states that Alaskans should, “assume all maintained winter trails are traplines unless otherwise marked.” Additionally, ADF&G recommends that “if you encounter traps or snares, immediately leash your pet and leave the area.”

According to the State, there are only 2,500-3,500 trappers in all of Alaska, with just a fraction of those trappers trapping in the Mat Su. Respecting the rights of the minority is a key principle of democracy, and we can still honor the rights of a small population of urban trappers to trap in these areas. But, should that tiny population of trappers have unrestricted access to trap on multi-use trails for half to three-quarters of the year while everyone else is instructed to “leave the area”?

- In their comments, ADF&G suggests that it’s enough to simply “encourage trappers to be cognizant of potential conflicts and to follow the trapper’s Code of Ethics”. This enforces the status quo is that one small user group can legally place weapons in multi-use areas, and they’re limited only by the non-binding terms of the Alaska Trappers Code of Ethics. If an individual trapper does not follow these voluntary recommendations, their actions can cause serious harm. What other user group is only regulated by a suggested Code of Ethics? None, other than trappers. Without any regulations to mark traps, check traps, or even place traps off trails, trappers have free reign over all trails in the Mat Su area, except for the 6 trails protected by the Borough.
- Alaskans make compromises between user groups all the time: some trails only allow skiers, mushers, or bikers while others are multi-use; some trails have leash laws and others do not; some areas are closed to motorized access while others cater to those users. There’s more than enough space for all users in the Mat-Su, including trappers. All we ask is that a small portion of some of the most popular, utilized trails in that open space be free of traps so that all users have places to recreate safely. If the Board takes issue with a specific trail/trails, we encourage you to not throw the baby out with the bathwater, but amend the proposal as you see is fair.

Finally, Alaska Wildlife Alliance submits an attachment via email of signatures in support of this proposal.

## Petition to Alaska's Board of Game



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Many people live in Alaska for the year-round recreational activities, and tens of thousands of people in the Mat-Su Borough (MSB) and surrounding areas enjoy multi-use trails in the region. As summarized by the MSB Trails Information Page, "Residents and visitors use trails year-round for fishing and hunting, access to remote recreation property, hiking, horseback riding, biking, off-road vehicle riding, skiing, snow machining, dog mushing, skijoring, and snowshoeing. Demands for quality trails increases every year and is expected to continue as visitors and residents get outside and enjoy the MSB's natural beauty and wild country in ever increasing numbers."<sup>1</sup> We respect the rights of trappers to utilize multi-use trails, and seek reasonable, regulated boundaries that ensure safe multi-use on the area's most heavily-used trails for thousands of other trail users as outlined in this proposal.

Printed Name	Signature	Address	Comment	Date
Michèle Wasson		2708 Aspen Dr Anchorage AK 99517	Thank you!	8/10/21
GRADY WILSON		3320 COSMIC CIR 99517		8/10/21
Gloria Oswald		3320 Cosmic Circle 99517	THANKS!	8/10/21
Robert Bent		1646 W 26th Ave Apt 202 Anchorage AK 99503		8/16/21
Melanie Andreanoff		5340 East 26th Ave Apt 99503	Awesome	5/10/21
Fred Tompkins		3226 Lake Park Cir 99517		↓
Robin Rahn		3640 E. 42nd Cir		8/10/21
Heather Werning		1511 Woo Blvd	←3 :3	8/10/21
Lavinia Harris		1965 E. Ridgeview Dr.		8/10/21
Charlie Mills		936 W 20th Ave Apt 5 99503	Save the dogs!!	8/10/21
Jay Grassman		1046 W 26th Ave #209 Anchorage 99503		8/10/21
Deborah Vankruff		1820 Logan St - Anchorage AK		8/10/21

<sup>1</sup> Matanuska-Susitna Borough "About Trails", <https://www.matsugov.us/trails/about-trails>.

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Printed Name	Signature	Address	Comment	Date
Martha Pitts		4340 Seley Circle Anchorage, AK 99502		10 Aug 21
Margaret Anderson		2321 Legacy Dr. Anchorage, AK 99576	Safety First!	10 AUG-21
Richard L. Anderson		"		"
John Mann		2200 Sunrise dr. ANC 99508		Aug-10th
Marty Toney		3900 Purdue Street		8/10
Janel Veulek		800 E Dimond Blvd Ste 193-407		8/10/21
HANK		1544 N St ANC AK 99501		8/10/21
BRENNA LINFORD		1345 O ST ANCH AK 99501	YES!!	8/10/21
KRISTA PECKANIN		1427 P St. Anch 99501		8/10/21
James Nysen		Anchorage 99501		8/10/21
Jaylene Peterson		1521 W. 15th Av. 99501		8/10/21
Korrin Nysen		1521 W. 15th Ave 99501		8/10/21

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Printed Name	Signature	Address	Comment	Date
Lisa Radl		7089 Fairweather Park Loop Anchorage, AK 99518		7/17/21
Leke Kelley		1105 Wildrose Ct. Anchorage AK 99518	Defy tyrants	7/17/21
Yvonne Ziegler		3439 E Secord Pkwy Loop Wasilla, AK 99654		7/17/21
Nelson Windman		1701 Beane Pl. Anchorage, AK 99504		7/17/21
Kirsten Rothacker		2824 North Cir ANC AK 99507		7/17/21
ANNA THORPE		PO BOX 243763 ANCHORAGE, AK 99524		7/17/21
DAMIAN HARDIN		SAKAI ST WASILLA, AK 99654		07/17/21
Kellie Mossbarger		PO Box 243763 Anchorage, AK 99524		7/17/21
Tatiana Polushkin		157 E. Nelson Ave #254 Wasilla, AK 99654		7-17-21
James Doherty		645 W Holiday Drive Unit 1 Wasilla AK 99654		7/17/21
Damarita Doherty		645 West Holiday Dr. Unit 1 Wasilla AK 99654		7/17/21
Jacob Wade		19307 Cherni Cir Eagle river Alaska 99577		07/17/21

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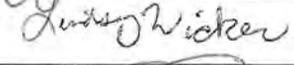
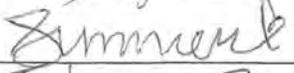
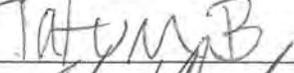
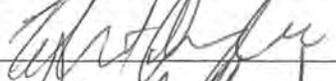
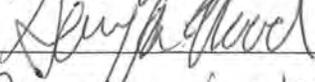
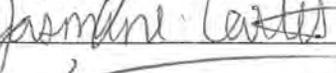
Printed Name	Signature	Address	Comment	Date
Nicole Schwartz		1300 W 7th Ave #205 Anchorage 99501	we need safe trails!	7/15/21
Mary Garrett		P.O. Box 273875 A/F 99524	Thank you for being here	7/15/21
Kyle Mielke		22150 POSSIPS CT #5 Chugiak, AK	Thank you	7-15-21
Cassie Comen		Wasilla	Thank you	7/15
Dusty Heckel		Wasilla	Thank You	7/15
Rochelle Burrell		24945 Homestead Rd Chugiak AK 99567		7/15
Lillian Harris		Eagle River	Thanks	7/15/21
Haylee Longsine		1308 F St. #3 Anchorage AK 99501	Thank you for making me aware of this.	7/15/2021
Dorothy Hansen		12590 Old Glenn #B Eagle River, AK 99577	Shake	7/15/2021
Tabitha Jones		23807 Chandelle Dr Chugiak, AK 99567	Thanks!	7/15/21
Lauren Cortez		10219 Caribou St ER AK 99577		
Andrea Hartman		Peterscreek, AK		7/15/21

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Printed Name	Signature	Address	Comment	Date
Erin KEANAWAY		17611 S BIRCHWOOD LP RD CHUGIAK AK AK 99567		7/15/21
Lindsay Wicker		3469 Lunar Dr. Anchorage, AK 99504		7/15/21
Matt Wicker		↓ Same ↓		7/15/21
Denice Frost				7/15/21
Summer Frost				7/15/21
Tatom Bales				7/15/21
Robert Capra		50435 Stephen Circle Chugiak Alaska 99567		"
Sonyia Hood		"		"
Jasmine Carter		11017 Celestial St Eagle River, AK 99571		7/15/21
Kristin Sniffen		760630 E Sandstone Dr Wasilla AK 99654	no traps!	7/15/21
Mae Lynn Golosten		7411 Warden Cir Anchorage AK 99518		7/15/21
Justin Stetsch		2734 Juneau Street Anchorage AK 99508		7/15/21

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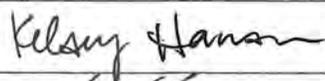
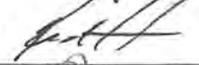
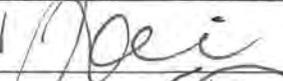
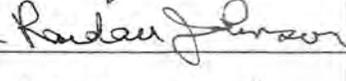
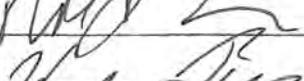
Printed Name	Signature	Address	Comment	Date
Keegan McDonald		11320 Bear Run		7/16/21
Nathan Muel		7867 E Flint Drive		7/16/21
Suzanne K MacKay		3349 Highland Rd. Eagle River AK 99577	Excellent	7/16/21
Wesley Compton		1875 L Suburban Dr	Awesome	7/16/21
Nicole Kelleher		P.O. Box 671801		7/16/21
Jovan Archuleta		Vasilik 99654		7/16/21
Kenny Korzon		14000 Old Glenn Hwy, 99577, #B		7/16/21
Elias Haroldsen		612 Lora Loop, 99515 #B	Awesome	7/16/21
Richard West		5429 East 19th Ct.		
Lisa Arner		17922 Teklanika D		7/16/21
Tara Brooker		19521 Highland Ridge		7/16/21
ROBERT BROOKER		"		7/16/21

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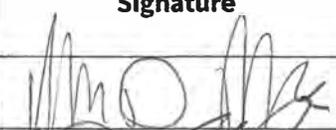
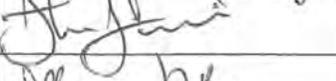
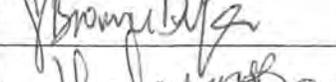
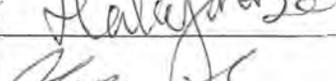
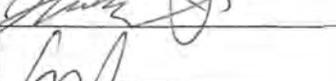
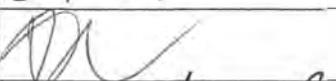
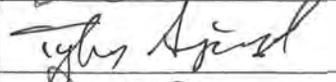
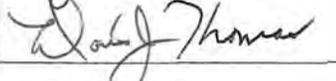
Printed Name	Signature	Address	Comment	Date
Kelsey Hanson		1701 Beaver Pl. Anchorage AK 99504	We want safe trails!	7/17/21
Keith Herring		22030 Deer Park Chugiak, AK 99567		7/17/21
FARRIS KORSHIN		11571 ROCKRIDGE DR ANCHorage 99516		7/17/21
Jack Price		630 cedar park		7/17/21
Olivia Cookman		165B Kenai Ave		7/17/21
Rhea Johnson		2323 Tundra Rose Ave		7-17-21
Randall Johnson		23233 Tundra Rose Ave Chugiak, AK 99567		7-17-21
Sud: Anellian		23233 Tundra Rose Ave Chugiak AK 99567		7-17-21
ROBERT TAYLOR		19030 2ND ST, ER AK 99577		7/17/21
Hudson Taylor		19030 2nd ST, ER AK 99577	Let's protect the wildlife.	7/17/21
<del>Patricia Taylor</del>		" " "	Protect the wd	7/17/21
Stacey Fuccillo		27283 Vantage Ave ER AK 99577		7/17/21

<sup>1</sup> Matanuska-Susitna Borough "About Trails", <https://www.matsugov.us/trails/about-trails>.

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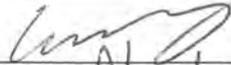
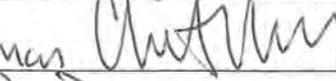
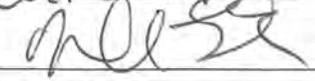
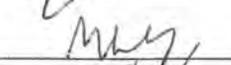
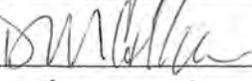
Printed Name	Signature	Address	Comment	Date
Kyilee Keller		3575 N Charley Dr Wasilla, AK 99654		7-18-21
Matthew Marsh		3575 N Charley Dr Wasilla, AK 99654		7-18-21
Jennifer Haupt		8501 Hidden View Ct Anchorage AK 99504		7-18-21
John Simon		1513 Elmendorf Anchorage AK 99504		7-18-21
Sarah Bramley-Dufau		1513 Elmendorf Dr. Anchorage AK 99504		7-18-21
Haley Burns		1051 N Elsinore Wasilla AK		7-18-21
IKuko Ziegler		3439E Serendipity Loop Wasilla AK 99654		7/18/21
Carz Ticich		1604 B Patriot Pkway SBER, AK		7/18/21
Stephanie Mattson		3070 Kintyre Ln. Wasilla, AK 99654		7/18/21
PNOYAKUK		3438 Cape St #20 Anch AK 99503		7/18/21
Tyler Spiegel		11902 Town Park Circle Eagle River, AK 99577		7/18/21
Doris Thomas		16422 Marcus St Eagle River, AK 99577		7-31-21

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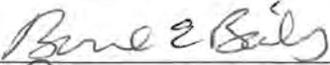
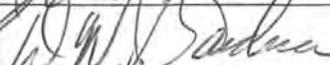
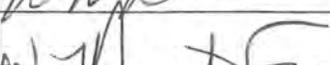
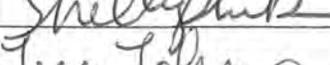
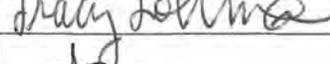
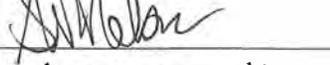
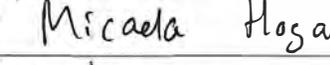
Printed Name	Signature	Address	Comment	Date
Lincoln Fang		Anchorage . 99507		7/31/21
Christina Kr		Seward, AK 99664		7/3/21
Art Davidson		2200 Seward H 99503	good game	"
Dawnell Smith		2501 Northrup Pl Anch AK 99508		7/31/21
Carlynn Tetterton		Anchorage 99501		7/31/21
James Llover		Girdwood Ak 99587		7-31-21
Michelle Young		226 Higher Terrace AK 99587 Girdwood,		7/31/21
Dorothy M Collins		3111 S 42nd Ave #A	☺	7/31/21
Laura Crox		3102 WILLOW	SMILES ☺	7/31/21
Bruce Reih		3001 Brookside Dr, Anch.	YES - SHARE	7/31/21
Janie Taylor		2300 Jefferson Av Anch AK 99517	Change BOARD	7/31/21
Madeline Dunn		7302 W Park Hwy MSB Wasilla #152	♡	7/31/21

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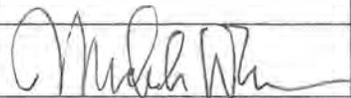
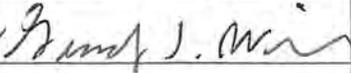
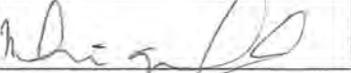
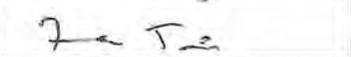
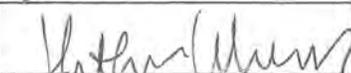
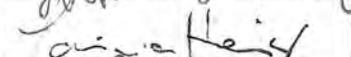
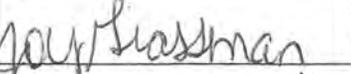
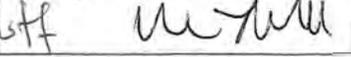
Printed Name	Signature	Address	Comment	Date
Gregory Stewart		3430+ Balchen Dr, Anchorage AK 99517	I want safe trails	7/31/21
Bonnie Bailes		8120 Little Dipper <sup>#A</sup> Anchorage, AK 99504		7/31/21
Jan Gordon		3000 Brookside Dr. Anch., AK 99517		7/31/21
Dale Gardner		PO Box 161514, Anch. AK 99516	Good luck	7-31-21
MARGARET FINNEGAN		2400 W MARSTON TR ANCH AK 99517		7/31/21
Shelley Plumb		936 Willow, AK 99688		7/31/21
Tracy Bohman		1401 Winchester Ln Anchorage, AK 99507	No trapping!	7/31/21
Courtney Owen		1150 Cordova St. Anchorage 99501		8/10/21
Steve Nason		2515 COTTONWOOD ST Anch. AK 99503		8/10/21
Micaela Hogan	Micaela Hogan	5808 Cordova St Apt 2 Anchorage AK		8/10/21
Marlene May		1400 E 11 Av.		8-10-21
Steven McNichols		4111 MacInnes St. Anch. 99508		8.10.21

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Printed Name	Signature	Address	Comment	Date
Michele Wasson		2708 Aspen Dr Anchorage AK 99517	Thank you! 	8/10/21
GRABY WILSON		3320 COSMIC CIR Anchorage AK 99517		8/10/21
Gloria Oswald		3320 Cosmic Circle 99517	THANKS!	8/10/21
Robert Gant		1646 W 26th Ave Apt 205 Anchorage AK 99503		8/16/21
Melanie Andreanoff		5340 East 26th Ave Apt Anchorage AK 99503	Aweasome	5/10/21
Fred Torrisi		3226 Lake Park Cir Anchorage AK 99517		↓
Robin Rubin		3640 E. 42nd Cir		8/10/21
Heather Werning		1511 Woo Blvd	<3 :3	8/10/21
Lavinia Harris		1965 E. Ridgerview Dr.		8/10/21
Charlie Mills		936 W 20th Ave Apt 5 Anchorage AK 99503	Save the dogs!! 	8/10/21
Joy Grassman		1046 W 26th Ave #205 Anchorage AK 99503		8/10/21
Deborah Vankruff		1820 Logan St - Anchorage AK		8/10/21

<sup>1</sup> Matanuska-Susitna Borough "About Trails", <https://www.matsugov.us/trails/about-trails>.

<u>printed name</u>	<u>signature</u>	<u>address</u>	<u>comment</u>	<u>date</u>
RIKKI FEIGHTNER		14307 Cherni Cir. Eagle River AK	Safe trails for all!	7/15/21
Denise Demetree-Trombley		25040 Schaff Dr Chugiak AK 99567		7/15/21
Virginia Hunter		5101 S. Surrey Rd Wasilla AK		7/15/21
William Hunter		5101 S. Surrey Rd Wasilla, AK 99654		7-15-21
Abby Tichenor		9223 W Parkview Terr LP Eagle River, AK 99577		7-15-21
Nat		12441 bke St Apt 1		7-15-21
Cristen Rolf		3419 G. Dayton Circle		7-15-21
Isabella Worst		19721 Big Diomedea Circle		07-17-2021
Melissa Gains		2207 N. Tabasco Ct Palmer, AK		7/17/21
KARLA F. Hornington		17720 S Jacinta Ln Eagle River, AK 99577		7/17/21
Brandon McElroy		12116 Business Blvd		7/17/21
ARN MATINIS		Ste. 6 9MB 327 1115 COUNINGTON CT A/A 99503		7/17/21
Elizabeth Wiegele		1831 Rebel Ridge Dr Anchorage, AK 99504		7/17/21
Rebecca Brewington		3767 W. Marble Way, Wasilla 99654		7/17/2021

12/15/21

Analia Steinberg | A Steinberg  
~~KNEEBAND~~ ~~TAYLOR~~  
~~instead of Taylor~~

2400 Galewood St  
Anchorage, AK 99508  
2244 Loussac  
Anchorage, AK 99507

No traps near  
trails!

8/10/21



PC008  
16 of 16

8/10/21



Submitted By  
Mike Harris  
Submitted On  
1/7/2022 8:27:05 PM  
Affiliation  
Alaskan Bowhunters Association  
  
Phone  
208-739-7445  
Email  
[mikeharris.aba@gmail.com](mailto:mikeharris.aba@gmail.com)  
Address  
2880 West Youngtree Drive  
Wasilla, Alaska 99623

### The Alaskan Bowhunters Association

Comments to the Alaska Board of Game

Central and Southwest Region

Wasilla, AK. January 21-29, 2022

Submitted January 7, 2022

The Alaskan Bowhunters Association (ABA) is a membership 501C-4 nonprofit organization representing conventional bowhunters. Our membership consists of both Alaska residents and non-residents who use archery tackle to hunt in in our great state. We thank the Board of Game for the opportunity to comment on some of the proposals that you find before you at this meeting.

Bowhunters are not a special interest group but rather are individuals who greatly enjoy the added challenges of hunting with gear that is significantly less effective than modern firearms. The challenge in bowhunting is spending enough time with your quarry to get inside of its normal defensive perimeter for an ethical killing shot. Alaska has a rich bowhunting history. From Art Young in the 1920s, to Fred Bear and Glenn St. Charles in the 1950's, and many more until this present day. These pioneers of bowhunting did not choose there methods out of convenience, but out of a sense of challenge and adventure created by the limitations in their equipment. Today, bowhunting allows for the opportunity to challenge ones self, while at the same time having a limited impact on the resource. To many of us, bowhunting seems to be an inherently more fair way of hunting. For others, it may be a way to extend their season by hunting with a bow during the bow season and a rifle during the general season. Regardless of ones choice, archery seasons add hunting opportunity to all user groups who choose to take advantage of them. To be certain, bowhunters must be persistent and usually spend considerably more time in the field with lower chance of success.

Most states have recognized that the limitations of equipment of bowhunting result in greater opportunity for hunters to spend time in the field with lower impact on the game resources. As a result nearly every state (except Alaska) has established long archery seasons both before and/or after the regular firearms seasons. Some would say that special archery seasons exclude those who enjoy hunting with a rifle but that could not be further from the truth. Anyone can take advantage of participating in an archery hunt provided they are willing to accept the challenge.

The ABA has submitted proposals for special archery hunts for Moose (**PROPOSALS 17, 57, & 82**), Dall Sheep (**PROPOSAL 4**), Brown Bear (**PROPOSALS 68, 91, & 94**), and Beaver (**PROPOSAL 11**). We would urge you to seriously consider these proposals from the perspective of significantly increasing hunter opportunity while having very minimal, if any, impact on the respective game populations. It is important to note that ADFG has commented on all ABA proposals that there would be **NO NEGATIVE BIOLOGICAL EFFECTS**.

### Proposal 4:

This proposal advocates for a 10 day registration hunt for Dall Sheep immediately following the general season in Units 9, 11, 13A, 13B remainder, 13C remainder, 14B and 16. This hunt would give bowhunters a short period of time to pursue Dall Sheep without any neqative

effect on populations. Based on data collected from ADFG, only 1.3% of rams were taken by bowhunters in a 10 year period. The legal size requirements and bag limits would be the same as during the general season and the fact that it would be a registration hunt would allow ADFG to control it based on their data. There are also currently no archery specific hunts for sheep in Alaska other than a few drawing permit hunts. This hunt would have zero downsides and we would strongly urge you to **SUPPORT** this proposal.

#### **Proposal 11:**

This proposal advocates for archery equipment to be added to the means of taking beaver ONLY WHEN FIREARMS ARE ALREADY ALLOWED in units 9, 11, 13 and 16. It simply makes sense that if firearms are a legal means to take beaver, a bow should be as well. There are already areas in the state where bow and arrow are legal to take beaver and we would ask that the same apply to these units. We ask that you **SUPPORT** this proposal.

#### **Proposal 17:**

This proposal advocates for an extended moose season for residents and non-residents in unit 17B. Currently, the moose season in 17B ends fairly early as compared to most other seasons throughout the state. By allowing bowhunters to hunt until September 25th, there would be significantly more hunter opportunity without any negative biological impact. The antler restrictions, bag limits, and reporting requirements would stay the same as already implemented in this area. The fact that this would be a registration hunt would allow for ADFG to control it based on their data. This hunt would have no downsides and we would strongly urge you to **SUPPORT** this proposal.

#### **Proposal 57:**

This proposal advocates for a 10 day registration hunt for moose immediately following the general season in Unit 11 remainder. This proposal is very similar to proposal 17 in that there would be significantly more hunter opportunity without any negative biological impact. Antler restrictions, bag limits and reporting requirements would be unchanged and a registration hunt would allow for ADFG to control it based on their data. This hunt would have no downsides and we would strongly urge you to **SUPPORT** this proposal.

#### **Proposal 82:**

This proposal advocates for a 2 day extension to the early archery seasons in units 14A, 14B and 16A. This would allow for bowhunters on extended backcountry hunts to continue hunting into the general season in 16A and allow for additional hunting days with no negative impact in 14A and 14B. We strongly urge you to **SUPPORT** this proposal.

#### **Proposals 68,91, & 94:**

These proposals would advocate for extended brown bear seasons for bowhunters. While the ABA does support the idea of extending these seasons for all legal methods of take, we offer up these options as an alternative in the middle. We strongly believe that these seasons for brown bears be extended especially in units 14 and 16. We strongly urge you to **SUPPORT** these proposals.

Bowhunting related proposals **NOT** submitted by the ABA:

The ABA respectfully asks the Board of Game to consider supporting the following proposals. Many of these proposals are very similar to those submitted by the ABA and we feel that all of these would provide great opportunity to hunters without having any negative impact. We strongly urge you to consider **SUPPORTING** the following;



**Proposal 87:**

While this proposal would take away the opportunity for those wishing to use a rifle in a select few permit hunts, the ABA would support that rather than the number of permits being reduced. Over the past few years, ADFG has brought permit numbers down for many of these any ram permit hunts. Rather than continue to lower permit numbers, the ABA would rather see more permits while restricting those permits to archery equipment in order to maintain a healthy population. This way, more hunters can draw these permits without a negative biological impact. If passed, this proposal also has the potential to create a more stable breeding population of rams in these areas as well as a higher percentage of older rams to be pursued. For these reasons we ask that you consider **SUPPORTING** this proposal.

**Proposals 60 & 61:**

Although the ABA supports the addition of opportunity provided by more archery only hunts, we cannot support these two proposals. According to ADFG, Unit 13 cannot support additional any bull permits and for this reason and to stay within the bounds of sound conservation, we ask that you **OPPOSE** proposals **60** and **61**.

Thank you for your consideration of our opinions.

Sincerely,

Mike Harris –Legislative Vice President

Alaskan Bowhunters Association

208-739-7445

mikeharris.aba@gmail.com



Submitted By  
Meghan Aube-Trammell  
Submitted On  
1/6/2022 7:56:44 PM  
Affiliation

Phone  
907-631-8079

Email  
[meggieaube@hotmail.com](mailto:meggieaube@hotmail.com)

Address  
241 N Oscar St  
Palmer, Alaska 99645

I support proposal 199 to prohibit trapping within 50 yards of multi use trails and trail heads. I am a mother of an active toddler and own a dog. Both of them are in danger from traps that can be found near trails. We love to get out and be active in our beautiful state. Please help us to continue to do this safely! Thank you!

Submitted By  
Johanna Bakker  
Submitted On  
1/7/2022 10:03:03 AM  
Affiliation



PC011  
1 of 1

## **Proposal 199.**

### **5 AAC 92.0550. Areas closed to trapping.**

I support proposal 199 to prohibit trapping within 50 yards of multi-use trails and trailheads.



Submitted By  
Allie Barker  
Submitted On  
1/7/2022 9:57:38 AM  
Affiliation

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### **I am strongly opposed to Proposal 210 and 211 to end the Copper Basin Community Harvest in unit 13.**

I have lived and hunted in unit 13 and 14A from my late teens for 22 years into my adult life. I have valued living an off grid, subsistence life, where I've worked hard to hunt-fish-gather-grow 100% of my food.

I believe all the claims from both proposals brought forth by Claude Bondy and the Alaska Outdoor Council, are clearly unsubstantiated by the harvest data put forth by the Department of Fish and Game. ADF&G have stated themselves that "this hunt structure poses no conservation concerns". *Please consider this statement.* It goes without saying that **The Community Subsistence Harvest has benefited numerous communities including, unit 13 residents, Ahtna communities, rural subsistence users and families/communities with generational historical Subsistence use.**

Contrary to Bundys comments about the rich and abundant wildlife that has provided living in unit 13, I've found it a struggle to survive living off the land for the past 22 years. In fact, I started raising pigs, chickens, ducks, and vegetables to offset the years when I was unable to harvest wild game during general season. Our state needs strictly managed alternative hunts like the CSH that provide a wider range of opportunities to feed our communities. When managed as intended, the CSH is a more sustainable hunt and gives another opportunity to sustain the Alaskan way of life.

In general season moose hunts, it is increasingly challenging to compete with technology's lightning speed demand for expensive rigs and 4 wheelers. There are few opportunities for those who choose to hunt in a non-motorized, more traditional way.

I stand with Alaska's strong identity with living off the land, hunting and fishing for sustenance, and supporting our god given right to our resources. We need data and science, not politics, to show best management practices to sustain our moose and caribou populations.

I believe Bondy's challenges have nothing to do with the community hunt, but instead the states lack of regulation, lack of non-motorized hunting zones which would reduce popular motorized hunting areas, and lack of enforcement for other hunts.

I want to start by talking about my experience being part of the community subsistent hunt. This hunt, more than any other, embraces and values Alaskan ethics including community, taking care of each other, sharing, using every part of the animal which ensures the meat positively impacts more households, sharing skills with less skilled friends, neighbors, family, and nourishing ourselves and our community. The strict meat salvage requirements mean our hunt uses meat more efficiently, feeds more families, and eliminates waste. My observations of others general season moose hunts have shown incredible waste. This is a stark contrast to the CSH and this fact alone should be reason to continue this hunt.

The current harvest data does not tell the entire picture. From firsthand experience I can tell you that the benefits of one hunter in a community group harvesting one moose goes far beyond a normal general season hunt. In the CSH, one moose is shared with up to 10 families, the hide is used for teaching traditional skills at a local school, the bones are made into nourishing bone broth, recipes are shared, potlucks are enjoyed by all. This hunt helps communities to thrive, share and wisely use resources, and honors Alaskan values. This type of community hunt does not exist anywhere else in the world, and it deserves to be honored for what the hunt was intended to do.

As it relates to Proposals 210 and 211, it should be known that living in and *qualifying for a federal subsistence hunt is not reason for eliminating the community subsistence hunt.* The federal hunt has always been a back up hunt and a more challenging hunt compared to state hunts. The federal land hunts are overcrowded, dangerous, and difficult to access.

The federal hunt does not meet our hunting needs. We depend on the community subsistence hunt to fulfill our needs.

I believe that more non-motorized zones as well as stricter management of hunts will improve the health and balance of the moose population in unit 13. If we look at all the moose taken in unit 13 every year, we can see it is not directly related to the community hunt but instead the advancements of technology, more money, and faster transport into unit 13. This unsurpassed opportunity is not equal within our communities.

I am encouraging and requesting that ADFG bring forth harvest data for unit 13 for "spike fork/50 moose" and we'll clearly see how few are taken by the CSH, in fact less than 10%. The CSH is an amazingly managed hunt, and could be managed better, but the request for this

proposal is clearly political. For the CSH hunt, I recommend enforcing the criteria of the hunt, which can be done through the end of season surveys that are required to participate in the hunt.



The CSH hunt follows state statutes per the Alaska constitution, has won court cases including the Alaska Supreme court and deserves to be given the respect intended by those who designed the hunt.

Additionally, *I support proposals 214 and 217* to eliminate the non-subsistence draw hunts for moose and caribou in unit 13 proposed by Ahnta Tene Nene'. Subsistence law, Section 16.05.258, are in place to give priority to subsistence hunters in times of a shortage of the resource. Its irrational for the board to consider eliminating the Copper Basin Community Harvest when these draw sport hunts still exist.

As the priority under Alaska State Law, I support more opportunities for subsistence users in unit 13. No unit 13 moose should be going to non-Alaska residents under these draw hunts while Subsistence user's moose harvest needs are not being met.

For these reasons **I ask you to strongly oppose Proposals 210 and 211.**

Sincerely,

Allie Barker

Submitted By  
Nathan Beck  
Submitted On  
1/3/2022 7:29:27 PM  
Affiliation



PC013  
1 of 1

I am writing this in support of proposal 199. There is simply no valid reason for trapping to continue to be allowed right next to or alongside multiuse trails, roads, and trailheads. This does not remove or prohibit trapping on any substantial amount of land or area. The setbacks are limited and will prevent most accidental deaths of dogs in traps. The negative publicity that occurs when these accidents happen reflect poorly on the trapping community as a whole. If this proposal is accepted, it benefits all user groups.



Submitted By  
Linda Benson  
Submitted On  
1/5/2022 3:04:51 PM  
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I am commenting on Prop 199 which is concerning restricting trapping in well traveled areas in Alaska. It is time that the Dept of Game consider the impact trapping is having on the majority of Alaska's population for about 6 months every year. Traps and snares indiscriminately maim and kill. Allowing trapping in populated areas is not acceptable. Trapping should not be allowed near trails or streets, in or near parks, near schools or ballfields, near houses or neighborhoods. I have heard trappers say if you see a trap leave the area. Rarely are traps seen or even marked with signage. Most Alaskans have no idea the park or trail they are on is an active trapping area. I have seen Fish and Game videos on how to release a pet from trap or snare by using a stuffed toy. It is never mentioned that you are most likely removing a dead or severely injured pet. I personally have helped recover a dog from a snare and it is not easy or pretty. Most people are not strong enough to release a trap. I know I can't even with practice. Asking trappers to be ethical when placing traps has not been working up to now. Nature does not need trapping to regulate Alaska wildlife. Traps are often left for days, weeks or past season and with no ID tags required game officers cannot fine those responsible. It is time to step up and protect Alaskans not just the minority trappers.

Submitted By  
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1/7/2022 12:28:31 PM  
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I am in favor of Proposal 228 requiring all traps and snares to have ID tags attached. Trappers who break trapping laws are not paying any fines because there is no way for Game Officers to ID the criminal. Also any trap or snare without an ID tag can be removed immediately. There is no valid reason for law abiding trappers to fear ID tags. When I burbot fish each of my setups has to have my ID info in plain sight but trappers are completely exempt. It makes no sense.



Submitted By  
Molly Benson  
Submitted On  
1/6/2022 3:08:58 PM  
Affiliation

I support Proposal 199. Please require trappers to keep their traps away from multi-use trails and trailheads.

Submitted By  
Molly Benson  
Submitted On  
1/6/2022 3:10:40 PM  
Affiliation

I support Proposal 228. Please require trappers to attach identification to their traps, to encourage compliance with trapping regulations and to make it easier for authorities to track down violators.



Submitted By  
Wayne Benson  
Submitted On  
1/7/2022 9:08:30 AM  
Affiliation  
Private Party

I am in support Proposal 228 requireing trappers to put identification tags on there traps. I don't see how any lititimate, responsible trapper would oppose this simple requirement.

Submitted By  
Wayne Benson  
Submitted On  
1/5/2022 3:50:00 PM  
Affiliation  
Private Party

I am in support of Proposal 199 to prohibit trapping within 50 yards of multi-use trails and trailheads in Units 13, 14, and 16. I can't believe that any resposible trapper would find any fault with this set-back distance. In addidion I beleive that this listing should include the areas around all parks, sports fields and public establishments of any kind. I also believe that the set back shoould be 100 yards not 50.. Thank you.

Submitted By  
Brianna Beswick  
Submitted On  
1/6/2022 4:17:03 PM  
Affiliation



PC017  
1 of 1

I am in support of proposals 199 & 228. As an Anchorage dog owner, I am terrified of going out anywhere where traps could be near trails. I would prefer even further than 50 yards, but that would be a very good start! And ID'ing will help to deter unethical trappers.



Submitted By  
Bill Billmeier  
Submitted On  
1/6/2022 7:36:14 PM  
Affiliation

I support Prop 199.

I think high-traffic public-use trails and roadside pullouts should be managed for all user groups and not in preference of one minority group. I do not agree that trapping considerations should supercede those of all other user groups. 50 yard setbacks on popular multi-use trails will not impact ethical trappers and greatly reduce problem interactions between user groups.

The trapper code of ethics is followed loosely in my neighborhood (Glacier View) and does not seem to be any deterrent at all, evidenced by the ongoing sets I find within 20' of roadside trails and pullouts every year, and by the ongoing instances of dogs being caught and injured or killed in public parking lots and easily-accessible trails and trailheads. I know of 3 sets currently active in my neighborhood, all within 10 yards of a trail or highway pullout, and I was not even looking for them. This is behavior expressly condemned by the Alaska Trapper's Association and they express dismay at roadside trapping when I report roadside traps to them directly.

This persists year after year. Although most trappers I know conduct themselves ethically, this proves to me that the voluntary code of ethics is not enough to encourage responsibility and provides absolutely no deterrence to unethical trappers.

A main argument used against pet owners is that there is a 'leash law' in the Mat-Su borough, implying that all pets must be leashed at all times. **This is not supported by the actual legislation** but the argument it is used to shut down any discourse and incorrectly deflect the responsibility of onto non-trappers.

At this point regulation in the form of Prop 199 is required to manage the land for all user groups.



Submitted By  
Mary Bishop  
Submitted On  
1/6/2022 11:25:19 AM  
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I am not sure I have selected the correct BOG meeting. Re BOG proposal 199

I support the general concept of proposal 199. I also would support an expansion of the proposal to include all private property unless The trapper obtains permission of the land owner. This provision is also consistent with the trappers code of ethics.



Submitted By  
Kerri Blaser  
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1/7/2022 11:09:18 AM  
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I support proposal 199 to prohibit trapping within 50 yards of multi-use trails and trailheads.  
I also support proposal 228 and am in full support of identification tags on traps.



Submitted By  
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1/7/2022 10:21:58 PM  
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I would like to voice my opposition to proposals 210 and 211 to end the Copper Basin Community Harvests in unit 13. I have lived in Alaska my entire life and subsistence has been a way of life for me and my family. I am third generation Alaskan my grandparents came to Palmer in 1935 and were part of original colonists families that moved to the mat-su valley. Since then we have established a generational tradition of subsistence hunting in unit 13 and 14 that is nearing on 90 years now. I have seen a lot of wasteful hunting practice from a lot of these newcomers who don't respect the old subsistence ways like we used to. I'm happy to see a hunt that makes you use all edible parts of the animal you kill and share it with people in your community less fortunate in the hunting season than you. That's the way I was taught by my parents and it's good to know at least some people are still living and hunting by those old subsistence ways. I'm turning 72 years old next month and I can't hunt anything but mushrooms and berries anymore because its harder for them to run away, but I taught my kids how to hunt with those old Alaskan values and they still do their best to bring me some meat to have every year to feed me and my disabled daughter who I care for at home. I know I don't live out in the woods anymore but subsistence and having wild meat and food is still a big joy and a meaningful part of my life. The community hunt has helped our family hold on to some of those old traditions and continue to have access to moose and caribou meat.



Submitted By  
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1/6/2022 11:46:36 PM  
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I strongly oppose proposal 210 and 211 to end the Copper Basin Community Harvest in unit 13. I believe all the claims of both proposers, Claude Bondy and the Alaska Outdoor Council, are clearly unsubstantiated by the harvest data put forth by the Department of Fish and Game. As stated in the Departments report: "this hunt structure poses no conservation concerns". I believe this statement cannot be ignored by the board. The Community Subsistence Harvest has benefited unit 13 residents, Ahtna communities, rural subsistence users and families/communities with generational historical Subsistence use since its inception and continues to do so. While there are proportionally less unit 13 residents harvesting in the CSH, that simple data breakdown doesn't show the whole picture. The 10 year average of moose per year that have been harvested by unit 13 residents through the CM300 hunt is 33.4. That roughly equates to over 15,000 pounds of edible meat per year harvested by unit 13 residents. That to me seems like a very meaningful benefit for those communities. Calculated from ADF&G public harvest record information.

I would also like to add that simply the harvest data falls short to show all the other positive cultural and societal impacts a hunt like this has on communities and the continuation of traditional subsistence values. It is very important that the board members take the time to read the criteria of these Community Subsistence Harvests before they vote on eliminating them. A few of the criteria I would like to highlight is the strict meat salvage requirements, which allow for proportionally more meat to be harvested from every animal harvested. Hunters should also demonstrate a pattern of meaningful communal sharing that provides first for the needs of the community or group elders and disabled, as identified by the community or group. Personally these hunts have had an incredible and meaningful impact on myself, my family and my community around practicing subsistence and pushing ourselves to be better community hunters sharing more meat with those without the ability of access to the resource.

All unit 13 federal hunters in our Community Subsistence Harvest group completely disagree with the Alaska outdoor councils claims that the federal hunts are enough for them to meet their Subsistence needs. Without the state Community Subsistence Harvest rural users will not be able to meet their Subsistence needs for meat requirements. The federal land hunts tend to be overcrowded, dangerous, and difficult to access among other issues that makes it an insufficient hunt to fully meet the needs of rural subsistence users.

Eliminating the Copper Basin Community Harvest would be a devastating blow not only to Ahtna and rural communities, but also to a way of life and traditional value system that is passed down (and mandated) through the very specific criteria of this hunt. If anything, I would encourage the board of game, and ADFG, to integrate more of the traditional subsistence values, meaningful sharing, community support, less wasteful, and teaching youth into more hunts positively influencing hunting culture in the future.

I support proposals 214 and 217 to eliminate the non-subsistence draw hunts for moose and caribou in unit 13 proposed by Ahtna Tene Nene'. Subsistence law, Section 16.05.258, is in place to give priority to subsistence hunters in times of a shortage of the resource. The board should not even be considering eliminating the Copper Basin Community Harvest if these draw sport hunts are to continue. This will create more opportunity for subsistence users in unit 13 as a first priority under the law. I also believe that no unit 13 moose should be going to non-Alaska residents under these draw hunts while Subsistence users' moose harvest needs are not being met.



Submitted By  
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Submitted On  
1/6/2022 2:29:07 PM  
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Please consider proposal 89. Traditional archery is a great management tool and great way for hunter opportunity with a lesser impact than modern equipment. Thank you.



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## COMMENTS IN SUPPORT OF PROPOSAL 75

I support Proposal 75.

Per AAC 11.20.985 (a)(12), the Tokositna State Recreation Area, except the Tokositna River is closed to the use of airboats between April 20 and July 10 annually. The primary purpose of this regulation is to protect the nesting Trumpeter Swans until such time as their cygnets hatch. In the past, this regulation has been enough to assist the Swan recovery; however, with increased airboat use over the past decade, mainly during moose hunting season, the critical habitats used by the Swans are being endangered.

Airboats are similar to jet boats in that they are used as a means to traverse shallow rivers. However, what is different is that airboats are specifically designed to be an all-terrain vehicle. It is purpose-built to excel at jumping off the main waterways and accessing wetland environments such as those that exist in the Tokositna Valley. These environments are critical to the nesting and rearing of the Trumpeter Swan. I argue that these sensitive environments be protected in perpetuity to the destruction of vehicles traversing them. For example, if an airboat happens to jump a beaver dam to access the backcountry and winds up destroying the surrounding wetlands critical to the swans, then that environment has been compromised. I have personally witnessed users of airboats engaging in this behavior. In fact, it is what the vehicle is designed to do and the very reason it is used.

Another issue is the soundscape environment:

Survey data indicated that fewer swans were observed in the upper reaches of the Tokositna River from 1995-2005 compared to 1975-1985. Long-term park employees are concerned that an increase in low-flying sight -seeing aircraft traffic is displacing swans in this area. *McIntyre, C. 2006. Changes in the abundance and distribution of trumpeter swans in Denali National Park and Preserve, Alaska. Alaska Park Science 5(2):25-29.*

The soundscape target limit set by Denali National Park is 60 decibels. Research on the soundscape indicates that the Tokositna Valley reaches or exceeds this limit solely from aircraft. In fact, it is one of the noisiest backcountry places monitored by the research project (<http://www.npshistory.com/publications/dena/nrr-2011-424.pdf>, pages 276-300). From personal witness, I can assure you airboats can be heard for several miles and they are very loud to the point of obnoxious. I am not sure what impact these have on displacing or disrupting the wildlife, but one only has to in the vicinity of one operating to know it cannot be good. I assure you it is much greater than 60 decibels.



It cannot be argued that the temptation and main purpose of use for airboats in the Tokositna Valley is to traverse the Tokositna Flats in pursuit of moose. The destruction of critical wetlands used by the swans for nesting and rearing of their young is happening and the unfair taking of game is another issue to be tabled for another day. The Tokositna River Valley encompasses wetlands critical to the nesting of Trumpeter Swans and their young. They raise their young until migration in the fall. It important for the preservation of the critical nesting habitat and survival of the cygnets to extend the protection corridor until such time as they are able to migrate.

I am a property owner at Pirate Lake off the Tokositna River and user of the area for over 20 years. I have witnessed increased traffic and airboat use over the last few years. Steps should be taken now to protect the critical wetlands that nature has produced naturally over hundreds of years that can too easily be damaged in an instant by airboats traversing the wetlands. I am a long-time Alaskan and do not have an aversion to airboat use in the Tokositna Valley. My argument is to continue to allow airboat use, but in a responsible, sportsmanlike, and environmentally favorable way.



Submitted By  
Douglas Borland  
Submitted On  
1/7/2022 2:34:28 PM  
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I am an Alaskan who has been involved in hunting in our great state since 1968. As a founding member and past board member of the Alaska Bowhunters Association, a past president of a major national bowhunters associating founded in the 1960s, a past outfitter and bowhunting guide in both Alaska and Russia, I have been involved and engaged in the board process as a hunter/conservatinist in Alaska for over 50 years. I hunt exclusively with traditional bowhunting equipment, and prefer backpack hunts using the quads God gave me!

Having extensive experience both watching and participating in the ever-increasing pressures on the resource by competeing interests targeting on our limited wildlife, I can only commend the Department and the Game Board for their efforts; and especially for the process that allows us this input.

I would like to offer my perspective and testimony on the following proposals:

PROP 2 RE: Archery seasons for dall sheep. SUPPORT Also support the "choose your weapon" option and it should be included in this proposal if past. Only the truly committed and most serious bowhunters would be participating in these extended seasons, the either/or weapon provision removes the "special privileges" argument, further reduces the pressure on the resource by spreading out hunters in the field, and reduces conflicts between bowhunters and rifle hunters in the general seasons.

PROP 4 RE: Establish archery only registration hunting SUPPORT Extends opportunity with limited or no measurable affect on resource, spreads out hunters and reduces conflict.

PROP 15 RE: Establish archery only registration hunt for moose: 17B SUPPORT Extends opportunity with little or no measurable affect on resource, spreads out hunters and reduces conflict.

PROP 16 RE: Establish archery only registration hunt for moose, remaineder 17B SUPPORT Extends opportunity with little or no measurable affect on resource, spreads out hunters and reduces conflict.

PROP 17 RE: Establish Archery only registration hunt for moose 17B SUPPORT Extends opportunity with little or no measurable affect on resource; spreads out hunters and reduces conflict.

PROP 60 RE: Create registration archery only hunt for Unit 13 SUPPORT The concept of either-or known as "choose your weapon" regulations under this proposal will first create new hunting opportunity with little or no impact on the resource. Secondly, it removes the conflict in the field between different methods and means (gun hunters vs archers) and it will result in only serious, more competant, and dedicated bowhunters in the field at this time. Finally, by restricting archers that choose this hunt to forgoing their rifles in other hunts, it negates the argument of "special privelege" given to bowhunters, and spreads the hunting pressure out over time. It is a positive and "new" way to approach the ever increasing competition between hunter factions.

PROP 70 RE: Open new season for baiting brown and black bear hunting in fall Unit 13 AGAINST Besides the obvious public image impacts of bear-baiting being unethical and contrary to the rules of fair chase, there are serious safety considerations. I have hunted in Alaska for 60 years, and as a bowhunter been up close and personal with hundreds if not thousands of black and brown bears. I know first hand the dangers of bears "habituated" to human food. Even one encounter with unattended food in camp invites a return visit with serious consequences. I oppose any bear baiting, but understand bear management issues. Baiting does allow harvest in a static environment; and many, including myself, relish bear meat and the resulting bear fat for cooking! But most importantly, baiting of brown bears, (which very few hunters do to put meat in the freezer) can only habituate the ones not taken that enjoy the bait; and increase bear-human conflicts, and I do not see how responsible wildlife managers can condone this practice.

PROP 89 RE: "Tradional Only" archery hunt, 14A Metal Creek SUPPORT With increase pressure on Alaska's iconic Dall sheep population, this is a way to spread the pressure, and allow a committed hunter/conservation group to avoid conflicts with other hunters in the field. By self-liniting themselves to only traditional archery equipment, the hunters in this late season hunt will have little impact on the resource, while maximizing the hunting process as an end in itself. To negate any arguments from other hunters regarding giving Traditional archers "special privilege", I would recommend adding a provision that archers choosing this new hunt not be allowed to rifle hunt in any other sheep areas, i.e. make this also a "choose your weapon" hunting area.



Submitted By  
Robert Bourland  
Submitted On  
1/6/2022 3:32:00 PM  
Affiliation

I would like to voice my support for proposal 2 put in by Paul Forward. Any time we can increase our opportunity without hurting the populations is a win. Archery sheep hunts early are a great idea!! The low success rates of archery hunters will allow more opportunity. Thanks

Submitted By  
Robert Bourland  
Submitted On  
1/6/2022 8:02:50 AM  
Affiliation

I am writing this in support of Proposal 89 put in by Mike Harris. A traditional archery sheep hunt would be a win for hunters and the department! The added opportunity to go afield with the increased difficulty of hunting with a short range weapon means less animals will be harvested.

There are many traditional archery restricted hunts now in the lower 48, several in Oregon, Oklahoma, West Virginia, Maryland. These hunts are a great way to increase opportunity without hurting the ungulate population because of the low success rates. A study done by Auburn University on Oklahoma's traditional hunt boasted the success of the program by cutting the success rates by about half while maintaining a older age class and healthier herd all together.

Thank you,



Submitted By  
Matthew Bowes  
Submitted On  
1/7/2022 7:47:21 AM  
Affiliation  
28 yr AK resident

**This comment is in support of Propositions 99 and 228** regarding trapping, trapper identification information attached to traps, and creation of a buffer zone adjacent to trailheads and along popular trail corridors.

As a long-time resident, trail user, hunter, and fisherman I spend a good deal of time outdoors. I have not always been a dog owner/handler, but also have been at different times. Arguably well trained/behaved dogs do not require leashes where allowed. Many activities are hampered by leashed dogs and in some cases create a greater threat to the owner, dog, and others while leashed.

Trapping is and should remain a part of our culture; performed ethically and legally trapping can easily coexist with other users in the same areas provided a reasonable buffer is maintained. With this said it is important to also make adjustments to regulations to accommodate the needs of the majority stakeholders in heavily used areas. The "buffer" proposed will accommodate the increased flux of recreational users while still maintaining the bulk of these spaces as areas where trapping can continue. Requiring traps to have owner ID information (maybe lic. # rather than personal info.) and/o trap line markers would potentially improve accountability of trappers to ensure regulations are followed whether maintaining buffers, frequency at which traps are checked, and timing of when traps are pulled for the season.

Trapline markers would also alert other users to the added hazards present in areas frequented by multiple user groups. As a trail user and outdoor enthusiast I've encountered traps while hunting, skiing, hiking, and fishing. In most cases the traps were located in areas not heavily used or entirely in the MatSu region. Despite having one 'close call' with a snare many traps are distinguishable from the surroundings, but all would be more easily avoidable if active trap lines and traps were visibly marked.

Regulations change with the times, the needs of the stakeholders, and the judgment of the managers. Just like the fisherman may need to adjust to only using a single-hook or no bait, migratory bird hunters limiting the number of shells or size of shot, it is time for trapping regulations to adjust.

Thank you for your consideration in this matter.

Matthew Bowes



Submitted By  
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12/26/2021 2:28:21 PM  
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I disagree with proposal 199 for the following reasons:

This proposal clearly has not been thought out and has massive contradictions within it. It should not stand. Definitions within the proposal clearly are contradicted.

***"This proposal specifically states that The proposed setback zone does not occupy enough space to significantly limit trapper opportunity. Further, by selecting only the most utilized and popular trails, primitive or trapper-maintained trails are not restricted by setbacks and would not reduce current trapping opportunity. "***

***"Also, Relative to the thousands of trails identified in MSB Recreational Trails Plans since 1984, 253 trails are considered "regionally significant" in the most recent plan. Regionally significant trails are defined as: "existing or proposed trails requiring borough action that are likely to attract recreationalists due to the quality of the recreational opportunities the trail provides." Regionally significant trails may be managed by the state, federal or borough governments, and are "considered to be the borough's highest priority for preservation."4 From the list of 253 Regionally Significant Trails, we further narrowed eligible trails to those that: • Exist (omitted proposed trails and connectors) • Have documented year-round use from multiple user groups • Are regularly maintained for multi-use "***

Yet, the writer plainly listed pretty much every trail in units 13, 14, and 16 without regard to their own definition of Regionally Significant Trails for Multi Use as shown above. Just one example of clear contradiction is Unit 14B Willow Mountain Trail as described from their own list within proposal as follows:

***Multi-use year round trail, portions are within the Kashwitna Management Plan Area, most of which is classified for forestry and managed by Division of Forestry. This is an unmaintained trail with trailhead parking available at WillerKash Road. Shown on Maps 1 and 7. Noted in the Kashwitna Management Area Plan. 1,7***

Therefore this proposal should be null and void on premise of broad sweep without regard to specificity.

Submitted By  
Derrick Branson  
Submitted On  
1/4/2022 7:58:10 PM  
Affiliation



PC029  
1 of 1

**I am writing in support of proposal 199.** I am a lifelong Alaskan, hunter, and fisherman. I think trapping should occur a safe distance from trails to protect kids and pets. My opinion is that 50 yards is still way too close! if you want to trap you should be well off the beaten path. Trails are for the community, not trapper right of ways.

Submitted By  
Maile Branson  
Submitted On  
1/4/2022 7:52:56 PM  
Affiliation



---

PC030  
1 of 1

**I am writing in support of proposal 199.** As an avid hunter and wildlife biologist, I am in full support of trapping as part of the Alaskan lifestyle. However, I DO NOT believe it should occur in recreational areas with high traffic that pose a risk to children, families, and pets.

Thank you for your consideration of this proposal.

Maile Branson, PhD



Submitted By  
Scott bredbenner  
Submitted On  
1/6/2022 7:30:25 PM  
Affiliation

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9076876138

Email  
[Akbred@hotmail.com](mailto:Akbred@hotmail.com)

Address  
2711 Jaime Way  
Fairbanks , Alaska 99709

I support props 199 and 228. Best for all Alaskans to reduce conflict. Just common sense.



Submitted By  
Jason Brett  
Submitted On  
12/15/2020 5:18:46 PM  
Affiliation

Phone  
19078419904

Email  
[jasonbrett84@yahoo.com](mailto:jasonbrett84@yahoo.com)

Address  
201 e. quincy cir.  
wasilla, Alaska 99654

Jason Brett

Proposal 75

I oppose proposal 75. It is unfair to ALL users of the area. There are current restrictions already in place for sensitive bird habitat. I am a property owner and an airboat user on the Tokositna River and this proposal was written by my neighbor, (a jet boater) who dislikes any competition during hunting season. Means and methods vary from user to user, wanting restrictions on users with other means and methods seems selfish. While I thank him for his concern of the area I encourage him to report all infractions he has witnessed to law enforcement.



Submitted By  
Thomas Brewer  
Submitted On  
1/5/2022 8:26:09 PM  
Affiliation

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907-854-2656

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Address  
3940 Checkmate Dr.  
Anchorage, Alaska 99508

I am writing in support of propositions 199 ( 50 yards trap setback from trails in MatSu ) and 228 (identification on traps). I have experienced traps set within five yards of a commonly used trail in the Nancy Lake SRA, and came close to losing my dog to one. Completely legal, but totally unethical. There are few enough opportunities for dog owners to let their pets run free, we need to be able to feel safe with our pets on our trails. I don't generally support more government regulations, but lazy and unethical trappers have made this necessary. As a corollary, enforcement will be impossible unless traps have to be labeled. If I can label my shrimp and crab pot buoys, trappers can label their traps; that's not difficult. Thank you for your consideration.



**Bristol Bay Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
1011 East Tudor Road MS 121  
Anchorage, Alaska 99503-6199  
Phone: (907) 787-3888, Fax: (907) 786-3898

In Reply Refer To:  
RAC/BB21057.EP

JAN 07 2022

Stosh (Stanley) Hoffman, Chair  
Alaska Board of Game  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chairman Hoffman:

I am writing to you on behalf of the Bristol Bay Subsistence Regional Advisory Council (Council) to provide comments on the 2022 Alaska Board of Game Central and Southwest Region Proposals 204, and 32 through 50.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Bristol Bay Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's Charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting via teleconference on October 26-27, 2021. Among the agenda items discussed were 20 Alaska Board of Game Central and Southwest Region proposals that are relevant to subsistence users and resources in the Bristol Bay Region. At that meeting, the Council reviewed and made recommendations on the following 2020-2021 Alaska Board of Game Central and Southwest Region wildlife proposals:

**Proposal 204:** Lengthen moose seasons in Units 9B and 9C and align hunt areas in Unit 9C

**The Council supports Proposal 204 with modification**

Modification:

**Unit 9B**

One bull by permit available online at <http://hunt.alaska.gov> or in person in Unit 9B villages or in King Salmon beginning Aug. 15,

~~Sept. 1 – Sept. 20~~  
**Aug. 26 – Sept. 20**



contact King Salmon for additional information

**Unit 9C (that portion draining into the Naknek River)**

One bull by permit available online at <http://hunt.alaska.gov> or in person in King Salmon beginning Aug. 15

~~Sept. 1 – Sept. 20~~

**Aug. 26 – Sept. 20**

Justification: The Council supports the idea of extending the moose season; however, the Council suggests to extend the season to an earlier date instead of a later date. If the season is extended to a later date as it is currently proposed by the Proposal 204 proponent, it is very likely that the bull moose will be in rut and the usability of meat will be questionable. The Council views this proposal as a good way of providing additional opportunity to the local residents to harvest meat, if it is extended into August and not September. If the proposal is extended later into September then it provides additional opportunity to trophy hunters and not local users. Additionally, the Council is concerned that later in the season the bull moose will be more vulnerable and possible overharvest can occur.

**Proposals 32 and 33 through 50:** Proposal 32 request closing the nonresident season for Emperor Goose in Units 9 and 10. Proposals 33-50 request increasing nonresident hunting opportunity for Emperor Geese in Units 9, 10, and 17; many specifically request an increase in the number of Emperor Goose permits allocated to nonresident hunters with some requesting up to 50% of permits be allocated to nonresident hunters.

Council discussed these 19 proposals in one block and didn't take position, but requested to provide their comments to the Board of Games.

Council's comment: The Council remembers with great pleasure when the Emperor Goose season was open again, how it was celebrated and how people were happy to have the geese. The residents of King Cove and Sand Point cherish these birds extremely as a valuable subsistence resource. The Council is concerned that in the recent two years the Emperor Goose population numbers are going down. The Alaska residents have been working hard to rebuild the population and to bring it to a level when it was possible to open the hunt. The Council wants to remain in the conservation mode to not to undermine the past successes and to pause until we have a stronger population. Some of the Council members were in support of establishing some restrictions, others were speaking in favor of maintaining the status quo, because only 25 drawing permits are available for nonresident hunters. A lot of the times when nonresident hunters take a bird they are not interested in and do not like its meat (sometimes it tastes like kelp). The Council thinks that the nonresident hunters are interested in the uniqueness of the bird and hunt it as a trophy. Depending on the population status it might be fine to allow a few geese to be taken by nonresident hunters, but the majority take should be by local residents.

The Council thanks the Alaska Board of Game for considering these comments, which reflect the importance of conserving healthy wildlife populations and providing for the continuation of subsistence uses in the Bristol Bay Region. The Council looks forward to continuing discussions with the Alaska Department of Fish and Game and the Alaska Board of Game on subsistence matters affecting the region. If you have questions about this letter, please contact me through Katerina Wessels, Supervisory Program Analyst, Council Coordination Division, Office of Subsistence Management, at (907) 786-3885 or [katerina\\_wessels@fws.gov](mailto:katerina_wessels@fws.gov).



Sincerely,

A handwritten signature in black ink, appearing to read "Nanci Morris Lyon".

Nanci Morris Lyon  
Chair

cc Federal Subsistence Board  
Bristol Bay Subsistence Regional Advisory Council  
Office of Subsistence Management  
Interagency Staff Committee  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Administrative Record



Submitted By  
Bryan Burkhardt  
Submitted On  
1/7/2022 10:21:01 AM  
Affiliation

Phone  
248-881/9840

Email  
[Shootsarrows@comcast.net](mailto:Shootsarrows@comcast.net)

Address  
6361 Crest Forest Ct W  
Clarkston , Michigan 48348

I support proposals #2 and #89. These proposals are a win-win in that they provide additional opportunities to be in the field with minimal impact on the resource.



Submitted By  
Shelby Burrige  
Submitted On  
1/7/2022 5:55:17 PM  
Affiliation

I support Proposal 199. As a trail user and dog owner, I am very concerned about the possibility of traps/snares placed close to the edge of trails. On trails where off-leash is permitted, my dog is well under voice control but I still fear an accident if she steps off trail for a sniff. Although I do not have children, there is a very real concern that a child could also be seriously injured in a trap. These trails are used by many different user groups and it can easily be argued that trappers are in the minority. I am not advocating for the prohibition of trapping on these trails, but I see the 50-yard minimum setback to be a very reasonable compromise to continued trapping and multi-user group safety.

Submitted By  
Shelby Burrige  
Submitted On  
1/7/2022 6:27:11 PM  
Affiliation

I support Proposal 228. Requiring that identification tags be placed on traps will be an aid to law enforcement and also a possible deterrent to those who may trap illegally. The majority of states that allow trapping require identification tags. It should not be a hinderance to those that are lawfully trapping.



Submitted By  
Matthew Buszka  
Submitted On  
1/6/2022 11:05:31 PM  
Affiliation

Hello Board of Game,

Please consider proposals 2,3,4,5,10,11,15,16,17,57,68,82,85,87,88,89,91,94 to help with archery hunting in your state and open more doors to bowhunters. I have never hunted Alaska but it is on my bucket list of places to hunt and this would help with that

Thank you Matt Buszka



Submitted By  
Tracey A Butler  
Submitted On  
12/20/2021 12:17:01 PM  
Affiliation

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907 733 1457  
Email  
[fireweedstation@mtaonline.net](mailto:fireweedstation@mtaonline.net)  
Address  
PO Box 200  
Talkeetna, Alaska 99676

As a recreational trail user in areas 14A, 14B and 16A I strongly urge the board to support Proposal 199 5 AAC 92.550 – to prohibit trapping within 50 yards from either side of multi-use trails and trailheads in Units 13, 14, and 16.

Some dangerous trap placements near trails and trailheads have serious consequences for hikers, skiers, mushers, and non-target animals. Traps near popular recreation areas pose a risk to people who recreate, families with children, and pets during winter recreation.

I have personal experience of trying to release my dog from a foot hold trap in a transportation right of way. It is an extremely disturbing and dangerous situation to find oneself in.

The ADF&G 2021-2022 trapping regulations booklet reminds trappers to:

“Act responsibly as a trapper and conservationist by trapping in ways to minimize conflict between trapping and other users, for example, avoid high recreational use areas. Avoid situations where you might catch a domestic dog or cat, such as near homes or trails frequently used by hikers, skijorers, dog mushers, or other people.”

The goal of this proposal is not to unduly restrict trapping, but to protect and reduce the uncertainty for users of multi-use trails by providing defined boundaries on trap placement. Trapping would still be permitted near the listed trails, provided they are placed farther than 50 yards from the trail and trailheads.

Trappers who follow the Trapper’s Code of Ethics’ third tenant, to “promote trapping methods that will reduce the possibility of catching non-target animals,” already trap away from heavily used trails. This setback will likely not impact trappers who already avoid trap conflicts in multi-use areas.

So please respect everyone's use of these popular trails by supporting proposal 199 5 AAC 92.550 and vote to prohibit trapping within 50 yards from either side of multi-use trails and trailheads in Units 13, 14, and 16.



Submitted By  
Janette Cadieux  
Submitted On  
1/7/2022 10:37:21 AM  
Affiliation

I support Proposal 199. I hope it becomes a model state-wide. Other states put reasonable requirements on trapping that are not in place in Alaska. Why is that? Why is it that this small group of trappers has such an outsized impact on the rest of Alaskans? Please put Proposal 199 into place.

Submitted By  
Daniel Casner  
Submitted On  
10/1/2021 3:24:29 PM  
Affiliation



PC040  
1 of 1

I am writing a comment in support of Proposal 199. I believe reasonable trail trap setbacks are the best way for us to share our beautiful trails. As an Alaskan, I support the rich tradition of trapping in our State. I also believe trails should be available for safe use by all recreators, including our dogs. I believe this proposal to be a fair compromise that allows for all of us to enjoy our beautiful trails without fear of injury to our dogs.

Submitted By  
Robert Cassell  
Submitted On  
1/7/2022 10:56:37 AM  
Affiliation



Comments from Robert Cassell  
Proposal 206

Brown bear hunting in GMU 9 has been suggested as an alternative to the limited access draw hunt in GMU 8. The Board of Game during the last Region IV meeting found that there was a biological concern in Unit 9 due to over harvest of female brown bears. 80% of the brown bears harvested in GMU 9 is by guided non-resident hunters and these non-resident hunters killed on average from 1995 through 2015 3.4 times more female brown bears than the resident hunters. During this same time the guided non-resident hunters harvested 1,449 sows while the residents took 443. Non-residents killed 1,006 more female brown bears than the resident hunters. At the last Region IV BOG meeting ADFG stated the over-harvest of female brown bears is causing a conservation concern for this population. The BOG responded by shortening the GMU 9 brown bear season for all participants by one week for both the spring and fall seasons. This further limited resident opportunity to participate in a trophy hunt for the largest brown bears in Alaska. Proposal 206 asks to open the brown bear season to resident hunters that take fewer female brown bears and in 2013 4.4 times fewer female brown bears than the guided non-resident hunters. Reinstate the resident hunter access trophy brown bear hunt that was taken from the residents by guided non-resident hunters killing an unsupportable number of female brown bears in GMU 9.

year	nonres sows	res sows	ratio of nonres sows	total sows	% of nonres sows	nonres over res
1995	109	45	2.4	154	71%	64
1997	121	41	3.0	162	75%	80
1999	166	53	3.1	219	76%	113
2001	156	48	3.3	204	76%	108
2003	143	54	2.6	197	73%	89
2005	153	35	4.4	188	81%	118
2007	139	39	3.6	178	78%	100
2009	142	38	3.7	180	79%	104
2011	123	39	3.2	162	76%	84
2013	110	25	4.4	135	81%	85
2015	87	26	3.3	113	77%	61
totals	1449	443		1892		1006
averages	132	40	3.4	172	77%	



Submitted By  
Jeff Chadd  
Submitted On  
1/4/2022 5:22:16 AM  
Affiliation

Proposal 206

This should not even be looked at there is plenty of time on the season dates that are now for everyone. This has worked for years and there is NO use in Changing them!

Submitted By  
Jeff Chadd  
Submitted On  
1/4/2022 5:18:27 AM  
Affiliation

Proposal 28

I think that taking the 1 every 4 years off would put more pressure on the bears! It has worked for decades and now there are more people and that adds the pressure on the resource and bears don't bounce back like some other animals. Leave it like it is!

Submitted By  
Jeff Chadd  
Submitted On  
1/4/2022 5:35:34 AM  
Affiliation

Proposal 208

I think the board should change this back to go along with 9A .When it was changed in 2019 it should have stayed with 9A. The weather is a big factor in 9C as it gets winter sooner in the fall and spring comes later than the lower peninsula. Also 75% of this unit is in the Katmai NP/P. It would give additional opportunity to hunters and you might see a little more harvest. The population right now is doing good and this would not affect it. Over harvest would be very hard as the Katmai NP/P is most of it closed to Hunting and it also borders the McNeil bear sanctuary.



Submitted By  
Mike Chihuly  
Submitted On  
11/29/2021 3:46:45 PM  
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Address  
16170 N Star Cir  
Ninilchik, Alaska 99639

I oppose Proposals #76 & #222 regarding seasons and bag limits in Unit 13.

Contrary to the proposal's statements, rock and willow ptarmigan numbers in units 13 E & B have been low/depressed for the last several years. Seeing large flocks of ptarmigan in the winter while on snow machines is hardly an accurate nor dependable indicator of overall ptarmigan health in a area as large as units 13B & E when ptarmigan typically congregate in large numbers. Please see ADF&G ptarmigan brood survey data for the past three years. Please see ptarmigan movement and migration habits in the winter per radio telemetry studies by ADF&G.

I have hunted the Denali Highway for ptarmigan since I was a young boy in the late 1950s. In the last 20 years, there has been a dramatic increase in interest for hunting these birds. More snowmachine hunters, more on-foot hunters, more road hunters, and a greater use and popularity in hunting ptarmigan with dogs. These birds now get hammered hard from 10 August until late fall and early winter when sport harvest tapers off. Late winter/spring harvests (late February-March 31) are **additive** mortality to these already stressed populations and should not be allowed when bird numbers are low/depressed. Most importantly, I support a continued season closure of February 15. In addition, I would welcome any reduction in daily bag limits in these units when numbers are low.

I would also suggest that the ADF&G/Board of Game consider the use of Emergency Orders in the future for managing small game in some areas. As you well know, this is a common practice with large game populations, and yes, this would be new for small game management. Due to increasing hunting pressures in some areas, I think we are getting close to the time when we need to think about this (EOs). We need to train our small game hunters to stay informed of regulations and get them more involved in small game management. It might take awhile to get small game hunters on board, but I think it can be done. When numbers are low, we should be restricted by seasons and bag limits to maintain opportunity in the field. When numbers are high, seasons and bag limits should be responsive enough to allow for more liberal harvest and time in the field.

One last note. Harvesting "limits" of birds for maximum poundage of meat is becoming less and less important than having the opportunity to hunt at all. I would rather hunt all day on foot with my dog for one or two birds than be shut down due to overly liberal bag limits, overly liberal seasons, and greed. Reduce seasons and bag limits when populations are depressed, and loosen those same regulations when populations are healthy and can tolerate greater mortality.



Submitted By  
Ashlee Clarke  
Submitted On  
1/7/2022 3:14:48 PM  
Affiliation

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2025492205

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Address  
9331 Stuart Circle  
Eagle River, Alaska 99577

I support Proposal 199 and 228. I think the restriction of trapping lines to outside of 50 yards of popular trails and the requirement of trap tags is reasonable and will increase the safety and enjoyment of trail users without putting unnecessary restrictions on trappers.



Submitted By  
Kenneth H. Cook  
Submitted On  
12/24/2021 5:37:48 PM  
Affiliation  
Alaskan

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21818 Lower Canyon Dr  
Eagle River, Alaska 99577

As an avid Alaskan outdoorsman and resident for over 43 years, I have reviewed proposal 199 that would prohibit trapping within 50 yards of multi-use trails and trailheads in Units 13, 14, and 16 and I agree with the regulation. It would greatly lessen the conflicts and tragedies between the majority of other users groups and trappers.



Submitted By  
Katherine cooper  
Submitted On  
1/6/2022 7:03:46 AM  
Affiliation

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9073170768

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6101 azalea drive  
Anchorage, Alaska 99516

I am waiting in support of 199 & 228. Clearer regulations would make it easier for trappers & dog owners to peacefully co-exist. I'm a dog owner but I have family members who trap. I believe that both parties should be respected & provided access to safely enjoy the trails & wilderness.

Submitted By  
Katherine cooper  
Submitted On  
1/6/2022 6:58:41 AM  
Affiliation

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6101 azalea drive  
Anchorage, Alaska 99516

We want to peacefully co-exist with trappers- I have family members that trap & hunt & game meat is in my freezer. This proposal would reduce friction with trappers & make it easier to take dogs out on bike rides or hikes where they stay within visual range- but can wrestle & run!



Submitted By  
David crandall  
Submitted On  
1/3/2022 9:42:37 AM  
Affiliation

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907-982-7471

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Address  
7212 w silver dr  
Wasilla , Alaska 99623

I do not support the proposal for the 199 trapping set backs, these trails are for everyone not just one group over the other. Most trappers follow the rules, why don't the dog owners which are the main supporters or this rule follow the leash law or educate themselves about the possibility of traps are always in the area!



Submitted By  
William Criner  
Submitted On  
1/7/2022 6:20:47 PM  
Affiliation

I oppose Proposal 211, the repeal of this hunt would be loss of a tradition going back a long time in this state. This hunt has a unique ability to engage an entire community that shares traditional knowledge. Working hard to put up meat for the year and doing it together to support those in our community who need it are values which are strongly supported by the structure of this hunt. A lot of people depend on it. It poses no threat whatsoever to anyone else or other users of the area.

I strongly oppose proposal 210. I believe all the claims of overharvest are clearly unsubstantiated by the harvest data put forth by the Department of Fish and Game. As stated in the Departments report: "this hunt structure poses no conservation concerns".



Submitted By  
Brad Dahme  
Submitted On  
1/6/2022 2:17:41 PM  
Affiliation

Phone  
Dahme  
Email  
[C8outdoors@gmail.com](mailto:C8outdoors@gmail.com)

Address  
1855 Brush Creek Rd  
Santa Rosa , California 95404

Dear ADFG,

I have never applied for a dall sheep hunt in the great state of Alaska as the draw odds are simply to long to justify the cost.

If Prop 89 were to pass I would quickly change my stance as a much smaller group of hunters would put in for this hunt and the draw odds could potentially increase dramatically. This would represent a revenue increase to ADFG and the guide service I would be hiring to assist with the hunt.

Thanks for your consideration.

Sincerely,

Brad - Longbow Hunter



Submitted By  
Carol B Damberg  
Submitted On  
1/7/2022 9:08:58 AM  
Affiliation

Phone  
19078919004  
Email  
[cd\\_damberg@hotmail.com](mailto:cd_damberg@hotmail.com)  
Address  
6000 Azalea Drive  
Anchorage, Alaska 99516

I am writing to voice my support for proposal 191.

Please support this very balanced approach to management of multiple uses on trails. Trappers and recreationists will all benefit by having clear expectations as to where traps may be set along multi-use trails. This proposal is very well written and clearly discusses why this regulation is needed and why it is a balanced and fair approach towards all user groups.

Alaskans make compromises between user groups all the time: some ski trails don't allow dogs, others do; some trails have leash laws and others do not; some areas are closed to motorized access or bikes while others cater to those users. There's more than enough space for all users in the Mat-Su. This proposal asks that a small portion of some of the trails in that open space be free of traps so that all users have places to recreate safely. Such regulations have been implemented in other areas of Alaska and continue to preserve the opportunities for trapping without an unfair burden being placed upon trappers.

Clear regulation is needed. A voluntary approach is not appropriate when dealing with such lethal methods of harvest. This is a simple and understandable regulation for all user groups that sets a clear demarcation.

Please support this proposal! Sincerely Carol Damberg.