



PC001

Submitted by: Denise Abel

Organization Name:

Community of Residence: Eagle River AK 99577

Comment:

I support trap set backs

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 147: Support

Proposal 68



PC 002

Submitted By Greg Acord

Wasilla, Alaska

I support proposal 68

For the past 34 years I've guided hunters on the southwest end of Kodiak Island in the areas where the Kodiak Caribou live, KOD 10, KOD, 11, KOD 14. In the past couple of years there has been a dramatic increase in hunting pressure and harvest of the caribou herd in Kod14. I support proposal 68 to help manage harvest and a healthy caribou herd population.

Proposal 73

Submitted by Greg Acord

Wasilla, Alaska

I support proposal 73.

I've guided hunters on Kodiak Island for 30+ years and have witnessed the Deer population fluctuate due to harsh winter conditions in the past. There has been an obvious decline in the Deer population over the past 3 years, following 2 consecutive harsh winters. I believe reducing the bag limit on Deer will help the population rebound faster than if the limit remains at current level.

Proposal 77

Submitted by Greg Acord

Wasilla, Alaska

I support proposal 77 as amended.

I've guided bear hunters on Kodiak Island for 30+ years. During the 1994-2006 seasons when guides were only allowed to harvest male bears or lose a permit the following year, myself and I believe most Kodiak guides looked at and studied all available information on how to determine the sex of a Brown Bear. Determining the sex of most Brown Bears is not an exact science or easy to do. While in the field I observe bears almost every day that I can't determine if they are male or female.

I fully support proposal 77 but think it's only logical that all non-guided hunters and new assistant guides be required to view the "Take a closer look" video and any other relevant education the Kodiak Fish and Game department can provide before going in the field. Without some education/information it's not possible for even the most seasoned hunters to determine the sex of most Brown Bears observed in the field.

I believe that a small percent of hunters will harvest any bear observed on a Kodiak hunt because they believe that this may be a once in a life time hunt and would rather harvest a female than not harvest a bear. As an incentive for all hunters to harvest male bears, any hunter that harvests a female and eliminates a permit for the following year, his or her name should be posted in the next years Draw application. If a non-resident guided hunter harvests a female his name and the guides name should be posted.



Proposal 78

Submitted By Greg Acord,

Wasilla, Alaska

I oppose Proposal 78

I have been an Alaskan resident since 1985 and have applied many years for a Kodiak Brown bear permit. I have also been directly involved in guiding Brown Bear hunters on Kodiak Island since 1988 and have witnessed many changes in the way the bear permits are issued. I believe the system currently in place is working well and is beneficial in supporting the successful Fish and Game Brown bear management plan and a healthy Brown Bear population.

The Brown bear population on Kodiak Island is one of the best managed wildlife populations in the world.

The Fish and Game Brown Bear management plan on Kodiak Island has been working exceptionally well for decades. Allowing a sustainable harvest while maintaining a thriving healthy population of an incredible resource, the Brown Bear. The formula that allows both resident and non-resident guided hunters to harvest Brown Bears is a delicate balance. That considers how many hunters can participate in the hunts, how many and what sex of bears can be harvested to maintain a thriving population.

One of the objectives in the F and G Brown Bear management plan is to have at least a 60% male bear harvest, this goal has consistently been maintained for decades using the current formula of 40% non-resident guided hunters and 60% Alaskan resident hunters.

On average 36% of bears harvested by resident hunters are female and 17% of bears harvested by non-resident guided hunters are female. On average 55% of resident tags issued are utilized, 45% of the hunters do not pick up the permits. 90% of the non-resident guided tags are utilized, 10% of hunters do not pick up the permits. These statistics all contribute to the formula that makes the Brown Bear management plan so successful.

Please note: The statistics used above are from the Kodiak department of fish and game. They are currently putting together the past couple of years data so these



numbers may change slightly in the future, the F and G did not expect them to change much as these numbers have remained consistent for many years.

Considering the statistics above, it is logical to conclude that any scenario in the permitting process that allows more resident hunters and less non-resident guided hunters in the field will ultimately result in a higher harvest of female Brown bears. This will have a negative impact on the Brown Bear population and the F and G Brown Bear management plan. The goal of Proposal 78 is to increase resident bear permits and decrease non-resident guided permits. For this reason, I oppose proposal 78.

The authors of proposal 78 are concerned that non-resident guided hunters on the federal land of Kodiak National Wildlife Refuge do not pay the \$5 application fee or apply for a permit through the draw application process.

An Alaskan resident hunter must purchase a \$45 hunting license before applying for the draw and pay a \$5 application fee for each hunt applied for. They may apply 6 times for the same species for a max. \$75. If successful they must also purchase a \$25 Brown bear/Grizzly metal locking tag.

Total \$100 revenue to State of Alaska. \$280 using Pittman-Robertson fund.

A non-resident guided hunter is required to send the department of Fish and Game a Guide Client Agreement prior to hunting on Kodiak National Wildlife refuge. They must purchase a \$160 Non-resident hunting license to complete the Guide Client Agreement. They must also purchase a \$1000 Brown bear/Grizzly metal locking tag prior to hunting. When hunting on KNWR they must also pay a \$22.21 daily user fee to the U.S. Fish and Wildlife service.

Total \$1160 revenue to State of Alaska. \$4,640 using Pittman-Robertson fund.

Total \$22.21 for 1 use day and up to \$333.15 if they hunt all 15 days of the permit, revenue to U.S. Fish and Wildlife service.

Please note: The income generated thru License fees and Locking tag purchases to the State of Alaska can be matched with federal dollars at a ratio of 1:4 using Pittman-Robertson Funds. For example, if the state generates \$1160 from a non-resident guided Kodiak bear hunter, that \$1160 equates to \$4,640 income for the state of Alaska. An Alaska resident Kodiak bear hunter generates \$280 income for the state of Alaska using the Pittman-Robertson fund. I don't think the Draw application fees are eligible for matching funds but could be wrong. The bottom



line is, with the matching funds of the Pittman-Robertson funds, 1 non-resident guided Kodiak bear hunter generates more income for the state of Alaska than 16 Alaskan resident Kodiak bear hunters.

The authors of proposal 78 are also concerned that the draw hunt supplement results do not show the DB100 series Non-resident guided hunters' utilization of the available permits in the hunt areas within the Federal land of KNWR.

If the information from the Guide Client Agreement that all non-resident guided hunters on KNWR are required to complete is included in the Draw hunt results, this would remedy any confusion about the Draw results.



Proposal 79

Submitted By Greg Acord,

Wasilla, Alaska

I oppose Proposal 79

I have been an Alaskan resident since 1985 and have applied many years for a Kodiak Brown bear permit. I have also been directly involved in guiding Brown Bear hunters on Kodiak Island since 1988 and have witnessed many changes in the way the bear permits are issued. I believe the system currently in place is working well and is beneficial in supporting the successful Fish and Game Brown bear management plan and a healthy Brown Bear population.

The Brown bear population on Kodiak Island is one of the best managed wildlife populations in the world.

The Fish and Game Brown Bear management plan on Kodiak Island has been working exceptionally well for decades. Allowing a sustainable harvest while maintaining a thriving healthy population of an incredible resource, the Brown Bear. The formula that allows both resident and non-resident guided hunters to harvest Brown Bears is a delicate balance. That considers how many hunters can participate in the hunts, how many and what sex of bears can be harvested to maintain a thriving population.

One of the objectives in the F and G Brown Bear management plan is to have at least a 60% male bear harvest, this goal has consistently been maintained for decades using the current formula of 40% non-resident guided hunters and 60% Alaskan resident hunters.

On average 36% of bears harvested by resident hunters are female and 17% of bears harvested by non-resident guided hunters are female. On average 55% of resident tags issued are utilized, 45% of the hunters do not pick up the permits. 90% of the non-resident guided tags are utilized, 10% of hunters do not pick up the permits. These statistics all contribute to the formula that makes the Brown Bear management plan so successful.

Please note: The statistics used above are from the Kodiak department of fish and game. They are currently putting together the past couple of years data so these



numbers may change slightly in the future, the F and G did not expect them to change much as these numbers have remained consistent for many years.

Considering the statistics above, it is logical to conclude that any scenario in the permitting process that allows more resident hunters and less non-resident guided hunters in the field will ultimately result in a higher harvest of female Brown bears. This will have a negative impact on the Brown Bear population and the F and G Brown Bear management plan. The goal of Proposal 79 is to increase resident bear permits and decrease non-resident guided permits. For this reason, I oppose proposal 79.



Submitted by: Justin Adolf

Organization Name:

Community of Residence: Kenai, Alaska

Comment: I support proposals 106 and 107, allowing moose hunting from motorized vehicles for the entirety of the moose hunting season. I would like it to be allowed for all hunters though. I happen to know for a fact that the horse only regulations were made by self serving board members who liked to hunt the rut without competition. There is plenty of land in unit 15C that is ONLY huntable from horses in the first place. Many people who live and work in Alaska and work in the oil industry work 2/2 or 3/3 weeks on and off, and could miss the entire season under the current rules. The current bull to cow ratio suggests that this would not be detrimental.

I do support proposal 118, allowing the taking of forked horn moose. From my experience, there are very few spikes but plenty of forks during hunting season. I would have been done hunting on opening day had I been able to shoot one of the several forks I saw.

I do not support opening up unit 15C to an early bowhunting season. Maybe bowhunting has its applications in urban areas, but I feel it is a special interest group trying to get priority. If you want to hunt with a bow that's fine and noble, but you shouldn't get your own special season. Actually, bowhunting after regular season while the moose are in rut would seem like a more favorable idea.

I do not support proposal 129. I do not believe in harvesting cow moose. The current cow to bull ratio doesn't support it either.

I do support proposal 132, considering that the wrong person looking at your moose rack can determine it's illegal when 9 out of 10 people would agree that it was legal.

I strongly support proposal 162, returning ptarmigan hunting to the traditional season. I do not know who changed the rules or why, but I have spent the majority of my life recreating in the Caribou Hills (starting in 1978, when I was 4) and I have never seen ptarmigan more abundant than they are today. After the forest fire in 2007, the habitat changed. Ptarmigan used to only breed up on the tundra before the fire, but now they breed all across the 80,000 acres that burned and grew back with willows. We used to never see them in the Caribou Hills area in summer, but now they are as common if not more common than Spruce Grouse on the trails in the summer and fall. I had a flock of about 30 wandering around the valley in front of my cabin last weekend! I suspect someone got offended by watching the Kilchers hunt them on tv and made the rule change to exclude hunting via snowmobiles. This does not serve the goal of allowing for ample opportunity to harvest wild game on state and federal lands, but furthers my suspicion that some people making the rules up are going by emotions instead of scientific facts, like ptarmigan abundance. Very few people who snowmachine in the Caribou Hills area of 15C even hunt ptarmigan. But those who do don't abuse it. Thank you for your time.

Justin Adolf

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 106: Support with Amendment Proposal 107: Support with Amendment Proposal 118: Support Proposal 119: Oppose Proposal 120: Oppose Proposal 121: Oppose Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Oppose Proposal 125: Oppose Proposal 126: Oppose Proposal 127: Oppose Proposal 128: Oppose Proposal 129: Oppose Proposal 130: Support Proposal 132: Support Proposal 133: Oppose Proposal 134: Support Proposal 135: Support Proposal 136: Support Proposal 137: Support Proposal 138: Support Proposal 139: Support Proposal 162: Support Proposal 163: Support



Ahtna Intertribal Resource Commission

PO Box 613 – Glennallen, Alaska 99588 www.ahtnatribal.org
Phone: (907) 822-4466 Fax: (907) 822-4406 connect@ahtnatribal.org

March 3, 2023

Alaska Board of Game
c/o Kristy Tibbles, Executive Director
P.O. Box 115526 Juneau, AK 99811-5526

Submitted electronically via adfg.alaska.gov and email to kristy.tibbles@alaska.gov

Re: Comments for the March 17-22, 2023 Southcentral Regional Meeting

To the Members of the Alaska Board of Game:

The Ahtna Intertribal Resource Commission is comprised of eight State and Federally recognized tribes and two ANCSA corporations and represent approximately 5,000 tribal citizens. The Ahtna Traditional Use Territory includes the game management units 11, 13 and portions of 12 and 20. The residents and tribal citizens of the eight villages and our neighbors depend on moose and caribou to feed their families.

Below you will see our comments on proposals 173, 174, 175, 187, and 207 coming before the Board of Game at their March 17-22, 2023 meeting.

Proposal 173 – Reauthorizing antlerless moose season in 13A

AITRC opposes proposal 173, which would reauthorize the antlerless hunt in 13A. Currently, the moose population is estimated at 146 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 quickly reduce the population to within or below management objectives within a single year.

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.

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.

**Proposal 174 – Establish an antlerless season in 13C**

AITRC is opposed to proposal 174, which would establish an antlerless season in Unit 13C. Although moose are currently above the midpoint of management objective 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 (15:100 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 quickly 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.

Proposal 175—Antlerless hunt in 13E

AITRC opposes proposal 175, 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. 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 quickly reduce the population to within or below management objectives within a single year. Additionally, there is the potential for more train fatalities.

Looking at the most recent IM report for Unit 13, it states that twinning rates within 13E were high between 2018-2020 even with the population being above objective since 2014 leading us to believe that the population is not nutritionally stressed.

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 187 – reauthorize brown-bear tag fee exemption

AITRC supports this proposal, as it would remove some of the barriers to participation in brown bear harvests. In addition, the tag fee exception would allow rural residents to defend life and property without dealing with compliance issues as it would be a legal harvest. Brown bear populations within units 11 and 13 are assumed to be healthy at this time and we are not aware of any conservation concerns that this proposal would negatively impact.

**Proposal 207 – Establish a Tier II hunt for Nelchina caribou in Unit 13**

In the Summer of 2021, the Nelchina Caribou Herd was estimated at 38,400. The state harvestable surplus was set at 1,250 and no winter hunt was authorized with a 2021 fall estimate of 35,500 animals. The Nelchina Caribou Herd was assessed prior to the 2022 hunting season at roughly 21,000 animals, a reduction of 14,500 animals. It was stated that due to severe winter conditions and a late spring thaw a higher-than-normal adult mortality and low calf recruitment occurred. In addition, it was stated that a small portion did not return from the wintering grounds.

Prior to the 2022 season, the herd was well below the low end of the population objective of 35,000-40,000. During the season there was a recorded harvest of 518 animals (84 draw harvest and 434 subsistence harvest) with no winter seasons open. In addition, the federal harvest is ongoing with a total of 121 animals with little to no harvest predicted for the rest of the federal season. After the 2022 fall season closed a population estimate was conducted via aerial surveys with an estimate of 17,433 animals, which is less than half of the lower end of the population objective. Nevertheless, over 3,800 tags were allocated for the 2023 season with an assumed harvestable surplus of at least 600 animals.

If the Board adopts regulations establishing a Tier II subsistence hunt for Nelchina caribou, the regulations should mirror the Tier I subsistence and Community Subsistence Harvest seasons: August 10 to September 20, and October 21 to March 31. The bag limit should be one caribou, and all the harvest requirements for Tier I subsistence hunting should apply to the Tier II hunt. The number of Tier II permits available should be based on (1) the estimated harvestable surplus of caribou in the year that a Tier II hunt is administered and (2) the predicted hunter success rates. ADF&G should apply the precautionary principle to ensure that there is no over-harvest, which would be especially harmful to the sustainability of the population while it is in a recovery phase.

Finally, AITRC also urges the Board to clarify that any member of an established community subsistence harvest group may hunt on behalf of any other group member who received a Tier II permit. Currently, the regulations provide that each group member who subscribes to the community harvest permit “must, if the community harvest hunt area is under a Tier II permit requirement for the species to be hunted, have received a Tier II permit for that area, species, and regulatory year.” 5 AAC 92.072(c)(2)(F). That requirement limits group members from hunting Tier II permits on behalf of other group members, contradicting the Board’s intent in adopting the community subsistence harvest program.

Respectfully,


Karen Linnell, Executive Director
Ahtna Intertribal Resource Commission

Corporate Headquarters
PO Box 649
Glennallen, Alaska 99588
Office: (907) 822-3476
Fax: (907) 822-3495



110 W
An
Office: (907) 868-8250
Fax: (907) 868-8285
Lorraine Office
PC 005
110 W
An
Alaska 99503
Office: (907) 868-8250
Fax: (907) 868-8285

Our Culture Unites Us; Our Land Sustains Us; Our People are Prosperous

February 28, 2023

Alaska Board of Game
c/o Kristy Tibbles, Executive Director
P.O. Box 115526
Juneau, AK 99811-5526

*Submitted electronically via adfg.alaska.gov and
email to kristy.tibbles@alaska.gov*

Re: Comments for the March 17-22, 2023 Southcentral Regional Meeting

To the Members of the Alaska Board of Game:

Ahtna, Incorporated (“Ahtna”) is an Alaska Native Regional Corporation formed under the Alaska Native Claims Settlement Act. Ahtna’s more than 2,000 Ahtna Athabascan shareholders include many residents and tribal members from eight villages in the southcentral and interior region of Alaska, centered on the Copper River Basin. These Native Village residents continue to live a customary and traditional hunting and fishing way of life. Ahtna has managed its land and resources, including moose and caribou populations in its traditional territory, since time before memory.

Ahtna submits the following comments on Proposals 173, 174, 175, 187, and 207 currently under consideration before the Board.

Proposal 173

Reauthorize the antlerless moose seasons in Unit 13A.

COMMENTS:

Ahtna opposes Proposal 173 to reauthorize the antlerless moose season in Unit 13A.

This drawing hunt for cows does not provide for subsistence opportunities. To reauthorize this hunt, the Board must at least make a finding that the harvestable portion of the population is sufficient to provide for subsistence uses and some other consumptive uses. AS 16.05.258. The Board has not made such a finding, and it should not.



The recent 2021-2022 and 2022-2023 high snow levels have weakened the population numbers.

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 their 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.

The ADF&G management objectives for Unit 13A is 3,500–4,200, and the 2022 Moose Abundance for Unit 13A is 3,621; this is a 21% drop in population from 2021. There is another heavy snow winter this year and the population is at risk of dropping more due to heavy snow and already stressed animals going into the winter from last year's bad winter. It is not a good time to liberalize management practices.

Proposal 174

Reauthorize the antlerless moose seasons in Unit 13C.

COMMENTS:

Ahtna opposes Proposal 174, 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.

Because this would be an antlerless hunt drawing permit, it would only provide for non-subsistence uses. To authorize this hunt, the Board must at least make a finding that the harvestable portion of the population is sufficient to provide for subsistence uses and some other consumptive uses. AS 16.05.258. The Board has not made such a finding, and it should not.

There was no reported data on the twinning rates to indicate that the habitat cannot sustain the current population. Heavy snow as seen during the 2021-2022 and 2022-2023 winters could easily reduce the population to within or below management objectives before longer term population dynamics are known.

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.



The ADF&G management objectives for Unit 13C is 2,000–3,000, and the 2022 Moose Abundance for Unit 13C is 2,943. While this population is holding near the upper management objective in 2022, adjacent GMUs are experiencing severe population declines due to heavy snow that may affect Unit 13C this year.

Proposal 175

Reauthorize the antlerless moose seasons in Unit 13E.

COMMENTS:

Ahtna opposes Proposal 175, 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.

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

Further, to reauthorize this hunt, the Board must at least make a finding that the harvestable portion of the population is sufficient to provide for subsistence uses and some other consumptive uses. AS 16.05.258. The Board has not made such a finding, and it should not.

Heavy snow conditions that we have experienced in 2021-2022 and 2022-2023 winters have had an impact on populations without known long term effects.

We are concerned that these cow-hunts may create a conservation concern that could result in restrictions on ceremonial moose harvest in the future.

The ADF&G management objectives for Unit 13E is 5,000–6,000, and the 2022 Moose Abundance for Unit 13E is 5,273. This is a 16% drop in population in one year due to heavy snow and very close to the minimum management objective. This year is another heavy snow year and the moose are stressed and not making it. It is not a good time to liberalize management practices.

Proposal 187

Brown bear tag fee exemption.

COMMENTS:

Ahtna supports Proposal 187. It will help with brown bear management in a way that benefits our area. The tag fee exemption improves the chance to take a brown bear opportunistically. This allows better management, reduces public safety concerns, reduces



property damage, and assists with increased survival of moose and caribou calves. The bear population and bear harvest are both improved by allowing increased opportunistic taking of problem bears that often prey on other bears.

Proposal 207

Establish a Tier II hunt for Nelchina caribou in Unit 13.

COMMENTS:

Ahtna opposes Proposal 207. Ahtna urges the Board to protect and sustain the Nelchina caribou population by ensuring that no hunting occurs until the herd fully recovers to within population objectives. Ahtna understands that foregoing subsistence hunting opportunities in the 2023-2024 season, at least, will be a hardship for Ahtna's shareholders, members of the Ahtna tribes, and others who depend on subsistence caribou. But there are overwhelming concerns regarding the sustainability of the Nelchina caribou herd.

Although subsistence hunting is vital to Ahtna's shareholders, the Nelchina caribou herd cannot sustain the current levels of hunting. The Board has set a management objective for the Nelchina herd of 35,000 to 40,000 caribou remaining after each fall hunting season. In previous years, the herd was at a stage of relative abundance. Between 2012 and 2016, the herd size ranged from 37,257 to over 50,000 caribou. This period of abundance continued through 2021, when the herd size was an estimated 38,400 caribou. During this time period, the intense hunting pressure and competition among hunters for Nelchina caribou continued to increase.

In 2022, the Nelchina herd collapsed. ADF&G's summer 2022 estimate was below 21,000 caribou. According to ADF&G's July 14, 2022 Advisory Announcement, the severe winter conditions and a late spring thaw resulted in higher than normal adult mortality and low recruitment of calves into the population. Changing climatic conditions also contributed to a late spring migration and a portion of the herd that did not return from wintering grounds. Although many of those environmental conditions are beyond ADF&G's control, ADF&G failed to implement any increased conservation measures to mitigate the changing conditions. The 2022-2023 winter is expected to continue and exacerbate those harsh conditions, resulting in an urgent need to reconsider the management approach for the herd.

The Board and ADF&G have a constitutional obligation to manage the Nelchina herd for sustained yield. The constitutional obligation requires the Board and ADF&G to adopt a precautionary approach to management decisions. When caribou herds enter



periods of precipitous decline, as the Nelchina herd is now, there should be little or no harvest to allow the herd to recover to a sustainable level.

Ahtna supports a moratorium on all hunting until the Nelchina caribou herd recovers to within population objectives.

If the Board adopts regulations establishing a Tier II subsistence hunt for Nelchina caribou, the regulations should provide open seasons that mirror the Tier I subsistence and Community Subsistence Harvest seasons: August 10 to September 20, and October 21 to March 31. The bag limit should be one caribou, and all of the harvest requirements for Tier I subsistence hunting should apply to the Tier II hunt. The number of Tier II permits available should be based on (1) the estimated harvestable surplus of caribou in the year that a Tier II hunt is administered and (2) the predicted hunter success rates. ADF&G should apply the precautionary principle to ensure that there is no over-harvest, which would be especially harmful to the sustainability of the population while it is in a recovery phase.

Finally, Ahtna also urges the Board to clarify that any member of an established community subsistence harvest group may hunt on behalf of any other group member who received a Tier II permit. Currently, the regulations provide that each group member who subscribes to the community harvest permit “must, if the community harvest hunt area is under a Tier II permit requirement for the species to be hunted, have received a Tier II permit for that area, species, and regulatory year.” 5 AAC 92.072(c)(2)(F). That requirement limits group members from hunting Tier II permits on behalf of other group members, contradicting the Board’s intent in adopting the community subsistence harvest program.

Sincerely,

A handwritten signature in black ink that reads "Nicholas Jackson".

Nicholas Jackson, Chair
Ahtna Tene Nené Customary and Traditional Committee
Ahtna, Incorporated



PC006

Submitted by: Zack Walters

Organization Name: Alaska Clearwater Sportfishing Inc.

Community of Residence: Cooper Landing, Ak

Comment:

Ethical standards of multi-use areas should include the safety of humans and there company. Trapping animals is an ancient method of harvesting wildlife and creates too much suffering of wildlife to be considered ethical means of harvest. Not to mention I have had many friends in the town of Cooper Landing have there dogs be caught in traps that are too close to the trails used by the local community.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147:
Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152:
Support Proposal 153: Support Proposal 154: Support



PC007

Submitted by: alexander kime

Organization Name: Alaska Horsemen Trail Adventures

Community of Residence: cooper landing, alaska

Comment:

I support proposals #146 through #154 with possible amendments. It is time we look at these areas of concern just like we do with mangageing each stretch of the Kenai River as well as all the other rivers for fishing. I recomend stepping up the regulations to include concerned trapping areas and treat each one with common sense trapping regulations. Some traps may be ok, others not so. Set backs should be looked at for each concerned area and should make sound sense for all users. It's time to fatten up the trapping book as we have come to that point where we need more regulations.

I am a business owner in Cooper Landing as well as a trail user. I am also on the advisory game board committe in Cooper Landing; however my comments are my own.

Thank you for looking at this and hopefully solving the problem for all user groups.

Sincerely,

Alex Kime

Alaska Horsemen Guest Ranch

cell/text

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support with Amendment Proposal 146: Support with Amendment Proposal 147: Support with Amendment Proposal 148: Support with Amendment Proposal 149: Support with Amendment Proposal 150: Support with Amendment Proposal 151: Support with Amendment Proposal 152: Support with Amendment Proposal 153: Support with Amendment Proposal 154: Support with Amendment



**Alaska Outdoor Council written comments on Board of Game proposals
for SC Region March 2023 Meeting.**

Proposal 55. Do not adopt.

Keep moose harvest at or near the carrying capacity of the habitat in SC.

Proposal 56. Do not adopt.

There is no conservation concerns for black bear in GMU 6, 7, or 15.

Proposal 58. Adopt.

Education goat hunters as to the difference between bully and nanny Mt. Goats is in the best interest of the resource.

Proposal 61. Do not adopt

No conservation concern from current hunter harvest.

Proposal 68. Adopt

Increased monitoring of the harvest of introduced reindeer (now called caribou) population during declining numbers by registration permit is reasonable.

Proposal 69. Do not adopt.

Keep the genetic differences between Rocky Mountain elk transplanted on Kodiak Island and Roosevelt elk transplanted on Afognak Island would be advantageous for future relocations of both subspecies.

Proposal 70. Adopt

Anytime the Department feels data would support a less restrictive registration hunt over a drawing permit hunt AOC is supportive.

Proposal 73. Do not adopt.

AOC does not believe deer hunter harvest is the limiting factor in determining the conservation of introduced black tail deer in the remainder of GMU 8. Deer meat provides a food source for many Alaskans but you can only stockpile it in your freezer or after preserving, not on the hoof.

Proposal 74. Do not Adopt.

AOC does not support regulations deviating from current salvage requirements for game meat in 5AAC 92.220. Wanton waste of game meat is against the law, enforce them.

Proposal 78. Adopt.

This proposal could increase resident brown bear hunting opportunities for Alaskans without disrupting the current drawing regime, unless sow harvest suddenly increases.

Proposal 81. Do not Adopt.

This is an anti-trapping proposal that does not currently address a conservation or public safety issue.

Proposal 106. Adopt.

ATV use hunting moose in GMU15C should be allowed.



Proposal 108. Adopt.

Registration hunts for Dall sheep in GMU7 - 15 would give the Board a better idea of the amount of hunter participation and demand.

Proposal 109. Do not adopt.

Close Dall sheep hunting in GMU15. Full curl regulations prevent over harvest of Dall sheep.

Proposal 118. Do not adopt.

Including fork antlers back to legal moose harvest in GMU15 depends on current moose population and Bull/Cow estimates. ADF&G collects that data and have determined that the bull forked population of the moose herd still needs a reduction in harvest. We will see if protecting that segment of the bull moose population allows for spike/fork hunting regulations in the future.

Proposal 130. Adopt.

Renewing the IM Management Plan for GMU15 depends on current moose harvest numbers and populations estimates are. Current ADF&G moose population and harvest estimates doesn't show a clear trend that either moose populations or harvest objectives will be achieved without implementation of a continuing IM Management Plan.

AOC supports 5AAC 92.118 with ADF&G's recommended changes.

Proposal 131. Adopt

Reauthorize Antlerless moose hunts on Kalgin Island is essential sense it is a predator free zone.

Proposal 133. Do not adopt.

Taking of black bear from boats in GMU15C does not cause any conservatism concerns.

Proposal 136. Adopt.

Extending season for brown bear registration hunts in GMU7-15 could reduce brown bear conflicts with people and still not create any conservation concerns.

Proposal 143. Do not adopt.

Reducing distance between bait stations and structures is not in the State's best interest at this time do to current federal litigation regarding "who" makes the hunting regulations for Non-Federally Qualified Subsistence users on federal lands. Getting eaten by a grizzly bear who was food conditioned to eating donuts is a real fear for some who may feel safer if they knew no bears were eating human food around a structure, cabin.

Proposal 144. Adopt.

There is no reason why the Board could not more clearly define what is required of a structure to be classified as a permanent dwelling in GMU7 and 15. Nor what a developed recreational facility constitutes.

The Kenai Peninsula is easily accessible to 75% of Alaskan, that alone justifies greater clarity for both hunters at bait stations and the public. It's unreasonable that this proposal would need to go statewide, no other part of the state has the number of folks to have outdoor conflicts as does the Kenai Peninsula due to it's location and road accessibility to hundreds of thousands of users.

Proposal 145. Do not adopt.

This proposals is an unnecessary for conservation restrictions by an anti-trapping NGO whose goal for years has been to ban trapping. Passage of this proposal would be inconsistent with Article 8 of the Alaska State Constitution.



Proposal 146, 147, 148, 149, 150, 151, 152, 153, 154, and 155. Do not adopt.
All these proposals are unnecessary restrictions on regulating trapping on the Kenai Peninsula.

Proposal 161. Adopt.

While the Board most likely does not have the authority to transplant game species, black tail deer, it would be worth showing public support to increase accessible game harvest for Alaskans.

Proposals 162 - 172. ?
in Kachemak Bay area. GMU15(C)

Proposals 173 - 185. ?

Reauthorization of antlerless moose depends on the most recent populations figures for moose populations. AOC expects a lot of that data will be presented before the board deliberates on these proposals and will monitor moose population estimates as it is made available.

Proposal 200. Do not adopt.

Special moose season for Alaskan's 65 years or older, close to the rut (September 26-30), are unnecessary for achieving moose harvest objectives in SouthCentral Region.

Proposal 204. Do not adopt.

Full curl harvests restrictions on Dall sheep assures that the species is being managed on a sustainable basis, closures to any Dall sheep hunting in GMU19C are unnecessary.
As far as gaining public support, having the Alaska Board of Game submit their own proposals doesn't help. Even if the state attorneys have no problem with the board submitting their own proposals it's bad public relations.

Proposal 206. Adopt.

Keeping the current IM plan active in GMU21(E) allows the department to be able to implement a plan should the moose population decline.

Proposal 207. Adopt.

Establishing a Tier II hunt in regulation for the Nelchina Caribou herd is required by statute whenever the harvestable surplus of caribou falls below, the amount necessary for subsistence.

Proposal 200. Do not adopt.

AOC does not support bull moose hunts during the high potential time of coming into the rut.

ALASKA



PC 009

PROFESSIONAL HUNTERS ASSOCIATION, INC.

P.O. Box 240971 ~ Anchorage, AK 99524

Phone: (907) 929-0619

Email: office@alaskaprohunter.org ~ www.alaskaprohunter.org

March 3rd, 2023

Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the March meeting in Soldotna. 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">• 91.8 Million total economic output (2019)	<ul style="list-style-type: none">• 57.4 Million new dollars to Alaska (2019)
<ul style="list-style-type: none">• 59% of guide industry spending occurs in rural areas (2019)	<ul style="list-style-type: none">• 1,380 people directly employed, total employment with multipliers; 1,890 (2019)
<ul style="list-style-type: none">• 85% Active Guides are AK Residents (2019)	<ul style="list-style-type: none">• Visiting hunters (guided & non-guided) purchase 14% of total Alaska hunting licenses (2019)



<ul style="list-style-type: none"> • Guided nonresidents represented only 3% of current licenses but 30% of License/tag revenue 	<ul style="list-style-type: none"> • Visiting hunters (guided & non-guided) contribute 76% of total revenue to the ADFG wildlife conservation fund (2019)
------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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 II regulatory change. Leading up to the drafting of these comments the APHA held multiple teleconferences and invited all members to participate in the drafting of these comments. Our teleconferences were well attended with over 20 individual guides representing small Alaskan businesses participating. 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 63- OPPOSE

APHA opposes changing the Unit 6 brown bear season based on the stated conservation concerns by the department.

**Proposal 65- OPPOSE**

APHA opposes proposal 65 based on the stated conservation concerns expressed by the department.

Proposal 75- OPPOSE

The APHA opposes prop. 75 because changing the bag limit in unit 8 to count wounded against the one every four-year bag limit on a unit basis will complicate bag limits greatly when hunters hunt in units without the same restriction. If this proposal is considered it should be considered as a statewide proposal. The APHA opposes supports ethical hunting and minimizing wound loss but opposes this proposal due to the complexities it will cause for hunters who hunt in Unit 8 but may then choose to hunt in another unit in the state.

Proposal 77- SUPPORT

The APHA supports this proposal because this restriction is incorporated in the Kodiak brown bear management plan. We urge the board to carefully review the harvest and hunter effort data to ensure data supports implementing of this portion of the management plan. If the data requires it restrictions on bear allocation should be put in place as recommended in the agreed upon management plan.

Proposal 78- OPPOSE

The APHA strongly opposes Prop. 78 because it will remove an important consumer protection for guided hunters who must cancel their hunt for family or health reasons. The effect of Prop. 78 will be to do away with the "alternate list" that was created to allow guides who have a state required contract with a client to seek a replacement IF an unforeseen event occurs and the hunter can no longer accept the tag or participate in the hunt. Guided hunts are reserved with a significant deposit with full funds due in a set timeframe before the beginning of the hunt. While rare, there are situations where a client must cancel their hunts. During our teleconference leading up to filing these comments guides shared personal stories of hunters who canceled due to terminal cancer, cancer treatments, deaths in the family or sudden terrible health conditions. The alternate list that is used currently allows a guide to refund the money from a hunt to a client if one of these tragic events occurs.

Passage of Prop. 78 will cause undo and unnecessary harm to hunters who intended to hunt on Kodiak but for reasons beyond their control can no longer do so. This proposal is unnecessary and harmful to hunters who through no fault of their own cannot participate in the hunt they booked. This proposal will cause guides to either forgo committed hunts or keep deposits, as they may legally do, without the option of filling the hunt and issuing a refund to their client or their surviving family.



Proposal 78 is punitive and unnecessarily harmful to hunters. Proposal 78 does not achieve a desired conservation outcome and will result in significant cost to the public.

Proposal 79- OPPOSE

The APHA opposes Prop. 79 because it will result in the transfer of allocation from one pool of hunters to another based on prior year participation. If this proposal is passed it will treat similarly positioned hunters and allocations differently. For instance, un-used resident tags or opportunities will not be transferred to nonresident allocations as the proposal is written. If the board seriously considers the proposal and mirrored treatment of unused resident tags and resulting increase in nonresident opportunities should be considered.

Transfer of guided nonresident opportunity to resident opportunities will result in different harvest rates of sows and may cause an overall reduction of opportunity in a given drawing area or unit-wide. Prop. 79 should fail as conservation outcomes may be negative and the proposal reduces opportunity in a legally questionable manner.

Proposal 80- OPPOSE

The APHA opposes Prop. 80 because it is unnecessary and counter to the brown bear management plan. Current allocations already are in-line with the proposed allocation in Prop. 80.

Proposal 82- SUPPORT

The APHA supports Prop. 82 based on the comments provided by the department.

Proposal 130- SUPPORT

The APHA supports Prop. 130 based on the departments stated conservation benefits.

Proposal 204- OPPOSE/AMMEND

The APHA recognizes and is concerned about the significant declines in sheep populations across the Alaska Range. Our members report similar declines (50-80% of the population) as the department depending on the specific area. However, the APHA OPPOSES a blanket moratorium on sheep hunting in GMU 19C. Sheep hunter harvest has not driven the decline in the sheep population and our current understanding is that a reduction in full curl harvest will not result in a faster sheep population recovery.

The APHA SUPPORTS amending Prop. 204 to create a group that will generate a western Alaska range sheep management plan based on the following factors:



- Scientific opportunity to study different management strategies after sheep population decline (comparison between areas closed to hunting, fully open and limited harvest)
- Western Alaska Range (WAR) has large tracks of state land with unlimited guiding
- WAR has large tracks of federal and private land where guides are limited
- WAR has a positive customary and traditional finding for a subsistence sheep allocation and priority
- WAR traditionally has high rates of nonresident participation due to remoteness and difficulty of access
- Recent federal actions to close portions of the Brooks Range to sheep hunting
- Predation is significant driver or cause of sheep mortality in some portions of the WAR

Past efforts to develop a statewide sheep management plan have failed. However, management plans for moose, caribou, bison and brown bears have succeeded when confined to smaller geographic areas. The APHA supports developing a management plan that is designed to increase sheep population in the WAR or mitigate risks of severe weather events in the future. This plan should be scientifically supported, and conservation based relying on expertise from department staff. Participation from the major landowners in the WAR to include private and federal stakeholders have the opportunity to alleviate the risk of federal or private actions that unnecessarily reduce opportunity to hunt in the future.

Proposal 206- SUPPORT



February 21, 2023

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

ATTN: BOG COMMENTS

Dear Chairman and members of the Board:

On behalf of over 1200 members of the Alaska Trappers Association, we wish to share our opinions on several proposals you will be considering at your March Southcentral Region meeting in Soldotna.

PROPOSAL #64

The ATA does not take a firm position on this issue. It's complicated. We don't feel that the proposed change in trap size will, by itself, impact any bycatch issue. We defer to the judgement of the Board for any resolution.

PROPOSAL #81

This appears to be a workable solution to snare encounters by deer and bears. Breakaway mechanisms have been developed for accidental moose catches in wolf snares. We can support the proposal but it should not be mandated until an appropriate mechanism has been developed.

PROPOSAL #104

ATA is categorically opposed to this proposal. It completely ignores the extreme fluctuations in lynx populations and the profound ability of lynx to range over wide areas. The proposal is purely philosophical. Hunting and trapping have little impact on viewing.

PROPOSAL #145

ATA deems this proposal unnecessary, at least as far as trapping is concerned. First, these crossings are not going to be completed for a number of years. Second, while these crossings will allow mobility for larger animals, they will not be the magnet that the proposal seems to think they will. Animals may frequent them just like they would any other habitat. To the extent they do get used, they will be used year around. Trapping is not likely to have any significant impact on the resource. Given that project completion is years away, no regulation like this should be imposed until the Department can ascertain the extent that furbearers would use the crossings and if there is actually any significant concentration. It would also be good to know if this is an issue in other states and, if it is, how do they deal with it and is their regulation beneficial?

PROPOSALS #146 – 153

ATA opposes these types of restriction. They call for a one-sided fix to a two-sided situation and would unnecessarily eliminate harmless harvest opportunity. Other users (namely, dog owners) have responsibilities also and there are other, less restrictive, ways of avoiding conflict. A combination of education and cooperation can allow coincidental use of these areas by all users. There is a significant amount of trapping opportunity which poses no hazard to people or pets that would be eliminated by



these proposals. ATA's Code of Ethics constantly reminds trappers to not set traps that could pose a threat to pets. We also encourage people to be responsible with their pets.

ATA and the Alaska Wildlife Alliance have been at odds over this issue for the past decade. Leadership from the two organizations met last summer. We agreed to work together on several fronts to reduce or eliminate the problem. Initial steps have been taken this winter. We ask the Game Board to give us time to determine if these actions will prove successful.

PROPOSAL #154

The ATA opposes this proposal. Trapline signage can be useful but it should be up to the individual trapper. While signage can be useful on trails that regularly get other traffic, it can also be useful to trapline scoundrels and would serve no purpose in areas that don't get significant multiple use. It could encourage other uses on trails that serve no purpose other than that of a trapline.

PROPOSALS #155 and 156

ATA opposes these proposals unless the Department deems them appropriate. A more logical action, which would allow for some harvest, would be to shorten the beaver trapping season back to allow under ice trapping only.

PROPOSAL #157

If the Department agrees, ATA believes this would be an appropriate change.

Proposal #158

ATA agrees that this would be an appropriate change. Aligning the coyote season with that of most other terrestrial furbearers is logical from the sense of fur quality and bycatch. The same is probably true for the wolf trapping season in Units 7 and 15.

PROPOSAL #159

ATA opposes this proposal. Fur quality on September 1st is not good. Fur quality on August 10th would be abysmal. Also, the taking of females during August could be detrimental to the survival of the young of the year. Trapping, within the established season, should remain the primary means of harvest.

PROPOSAL #160

ATA opposes this proposal. We believe that beaver can be better managed by simply manipulating the harvest season. Seasons would certainly be easier to enforce. It doesn't seem logical to limit the take to just half of a breeding pair prior to breeding season. The other half of the pair would not be productive.

Thank you for allowing ATA to participate in the regulatory process.

Sincerely,

Randall Zarnke, president

**Comments on 2023 Board of Game - Southcentral Region Proposals**Proposal 75

Alaska Wildlife Alliance **supports** this proposal, both as it applies for Unit 8 and/or all areas with a one bear every four regulatory year bag limit.

This proposal echoes a 2007 regulation proposed by the Kodiak Fish and Game Advisory Committee and supported by the Kodiak Unified Bear Subcommittee (KUBS) that requires a wounded bear count against a hunter's bag limit. The KUBS is a citizen's group organized to work with natural resource agencies on the Kodiak Archipelago to encourage respectful conservation of Kodiak bears through research, management, and education. The group was created in 2003 as a recommendation of the Kodiak Archipelago Bear Management and Conservation Plan and includes representatives from a wide array of stakeholder groups including conservation organizations, bear hunting and viewing guides, local residents, Native land managers, and air-taxi operators. That regulation was initially adopted to encourage ethical hunting, promote ethical shot selection, and reduce wounding loss. The current regulation continues to be supported by the Kodiak Advisory Committee and the Kodiak Unified Bear Subcommittee and has gained widespread acceptance on Kodiak. Expanding this ethical regulation to areas where bag limits are low for conservation, such as Unit 8, makes sense.

This proposal would likely decrease the number of wounded/dead bears because hunters would be more considerate of shot selection and shot placement. We also agree with ADF&G that hunters/guides may conduct a more thorough and proper search for a wounded bear and apply greater effort in their search. With regards to the concern that this regulation would discourage unscrupulous hunters/guides from reporting a wounded animal, we remind the Board that this regulation is already in place and widely accepted in Kodiak. Bad apples are going to be bad no matter what, but this regulation would reduce unnecessary waste and provide an avenue for accountability.

Proposal 77

Alaska Wildlife Alliance **supports** this proposal. ADF&G reports that the estimated density of independent bears recorded in 2019 was less than half the estimated mean density of four previous surveys during 1987-2007 and was only 58% of the lowest accepted management target prescribed for southwestern Kodiak Island as identified in the Kodiak Brown Bear Management Plan. While agencies determine the extent that forage quality impacts the bear population, this alarming decline warrants immediate action to reduce brown bear, particularly female brown bear, mortality.

As outlined in the Kodiak Brown Bear Management Plan, and in the interest of managing this important resource for sustained yield, efforts must be made to reduce harvest in areas exhibiting a potential population decline. Because female harvest has direct impacts on recruitment and population sustainability, we support the AC's efforts to reduce female harvest through this proposal.

Proposal 81

Alaska Wildlife Alliance **supports** this proposal. We share concerns with the proposal authors of the impacts of snares on non-target wildlife and dogs. This proposal would still allow for trapping, but may likely protect non-target wildlife from the most harmful bycatch. It is notable that the



Comments on 2023 Board of Game - Southcentral Region Proposals

Department reports multiple calls of brown bears caught in foot snares initially set to capture foxes. Since 2016 the department has observed and/or handled 2 bears and 2 deer caught in foot snares and has dispatched 2 additional bears due to significant injuries inflicted by foot snares not equipped with breakaway mechanisms. The department also reports that they receive complaints of domestic animals caught in snares along the Kodiak Road System, particularly in popular, high traffic areas. We hope the Board considers these incidents along the Kodiak Road System and the widespread public plea to adopt additional regulations that provide a safety mechanism for non-target species caught in snares.

Proposal 85

Alaska Wildlife Alliance **opposes** this proposal because there are not enough goats in the area to warrant a new hunt without conservation concerns.

Proposal 103

Alaska Wildlife Alliance **opposes** this proposal. Habituating brown bears to bait in an area close to the State's largest municipality may increase bear-human conflict. While the bait station would be difficult to access, the author expressly requests this area to expand opportunities for hunters close to Anchorage. The hunt, like the bears this hunt pursues, would also be close to Anchorage and exposed to human food in Chugach State Park. This Park is Anchorage's recreational hotspot, and habituating brown bears to these foods may be a danger to Park visitors.

Further, this hunt would require multiple administrative changes, such as a special use permit to discharge weapons and new hunts for brown and black bears in the area. While there may not be a conservation concern for the bears in this area, concerns over bear-human conflict must be seriously considered.

Proposal 104

Alaska Wildlife Alliance **supports** this proposal.

Proposal 109

Alaska Wildlife Alliance **supports** this proposal. ADFG data shows that the population has declined 80% since 1968. Current management using full curl regulations has not prevented this decline. In the interest of sustained yield, we encourage the Board to take any necessary measures to reduce mortality and increase conservation measures, including limiting hunting until there are signs of recovery.

Proposal 116

Alaska Wildlife Alliance **supports** this proposal, as conserving female goats in the hunt area will provide ongoing opportunity for harvest and clarifying the penalty language may reduce confusion.



Comments on 2023 Board of Game - Southcentral Region Proposals

Proposal 130

Alaska Wildlife Alliance **opposes** this proposal. The stated purpose of Proposal 130 is to continue the habitat enhancement and predator control plan first adopted in 2012, but with minor amendments.

This proposal, if adopted, would violate AS 16.05.255(e). The relevant applicable statutory language is as follows:

"The Board of Game shall adopt regulations to provide for intensive game management to restore the abundance or productivity of identified big game populations as necessary..."

The Department makes it clear in Proposal 130 that moose population and harvest goals are being currently met. In other words, there is no evidence of a need to "restore" the abundance of moose, and there is no evidence that it is "necessary" to authorize intensive game management in Unit 15C.

The Department's proposal authorizes extreme measures to take wolves. Those extreme measures include the following:

- A. hunting and trapping of wolves by the public using motorized vehicles [i.e. chasing wolves using snow machines]
- B. public aerial shooting permits issued by the Commissioner under AS 16.05.783
- C. aerial wolf removal by department personnel under AS 16.05.783.

AS 16.05.783 provides for authorization of these extreme measures as part of a predator control program in only two circumstances, described in AS 16.05.783 (a) as follows:

- (1) in regard to an identified big game prey population under AS 16.05.255(g) that objectives set by the board for the population have not been achieved and that predation is an important cause for the failure to achieve the objectives set by the board, and that a reduction of predation can reasonably be expected to aid in the achievement of the objectives; or
- (2) that a disease or parasite of a predator population (A) is threatening the normal biological condition of the predator population; or (B) if left untreated would spread to other populations.

The Department's explanation for its proposal is stated in relevant part as follows:

"The department would like to have the plan [adopted in 2012] reauthorized with predator control and habitat enhancement options. *While Unit 15 C moose population and harvest objectives are currently being met* the department sees a benefit to reauthorizing and updating the plan. Updates to the plan include adding habitat enhancement, which was not the focus in the initial IM plan development. The department's intent is to utilize habitat work to maintain moose populations within objectives."



Comments on 2023 Board of Game - Southcentral Region Proposals

The statutes authorizing intensive game management and extreme measures for controlling wolves do not allow intensive game management, and the use of extreme measures in these circumstances. The mere fact that the Department "sees a benefit" in reauthorization is insufficient grounds for approving an intensive game management plan, with extreme measures for controlling predators. For this reason, the proposal should be rejected in its entirety. We believe this proposal is illegal, and that fact can easily be demonstrated to a court having jurisdiction.

Further, the population objective for 15C that the department seems to have been wrestling with is the low bull to cow ratio; in other words, too many cows. Consequently, 15C has had several years of antlerless hunts in an effort to reduce the proportion of cows in the population. This year, it's DM549, but there are two either-sex moose hunts in the regulations that can be activated if an inadequate number of cows are killed. There's only one predator that disproportionately kills bulls over females, and that's humans, not bears or wolves.

Instead of reauthorizing IM, we encourage more wildlife enforcement in the Caribou Hills, given its hunter density and potential for snowmachine harassment of post-rut bulls.

Proposal 134

Alaska Wildlife Alliance **opposes** this proposal on the grounds that increasing season length and opportunity will likely increase the chances this hunt is managed by Emergency Order. Upholding the mortality cap for this bear population is extremely important. Given the 5 day reporting requirement and success rate of harvest over bait, we expect that if the season is expanded, the cap will be reached before the end of the season and Emergency Orders will have to become the default management system. This creates confusion for hunters and those tracking this population. We advocate against management seasons that are so long, they almost always require EO actions to maintain mortality caps.

Proposals 135, 136, 137, 138, 139, 140

Alaska Wildlife Alliance **opposes** these proposals for the same reasons as Proposal 134, but even more so given the 30 day season extension requested in Proposal 140. We do agree that the discrepancy in seasons is not ideal, though for different reasons. Habituating brown bears to bait that is exposed over black bear bait stations is a concern to our membership.

Proposal 143

Alaska Wildlife Alliance **opposes** this proposal. The existing one mile restriction has been in place for over forty years, and for good reason. One mile is the minimum distance to provide a safe buffer around a bait site to limit interactions between nonhunters and bears. Bears are habitually attracted to bait sites and will check these sites for food even after food is gone. Decreasing the bait distance to human-occupied areas will only increase human-bear conflict and DLPs, particularly around campgrounds, homes and schools.

Proposal 144

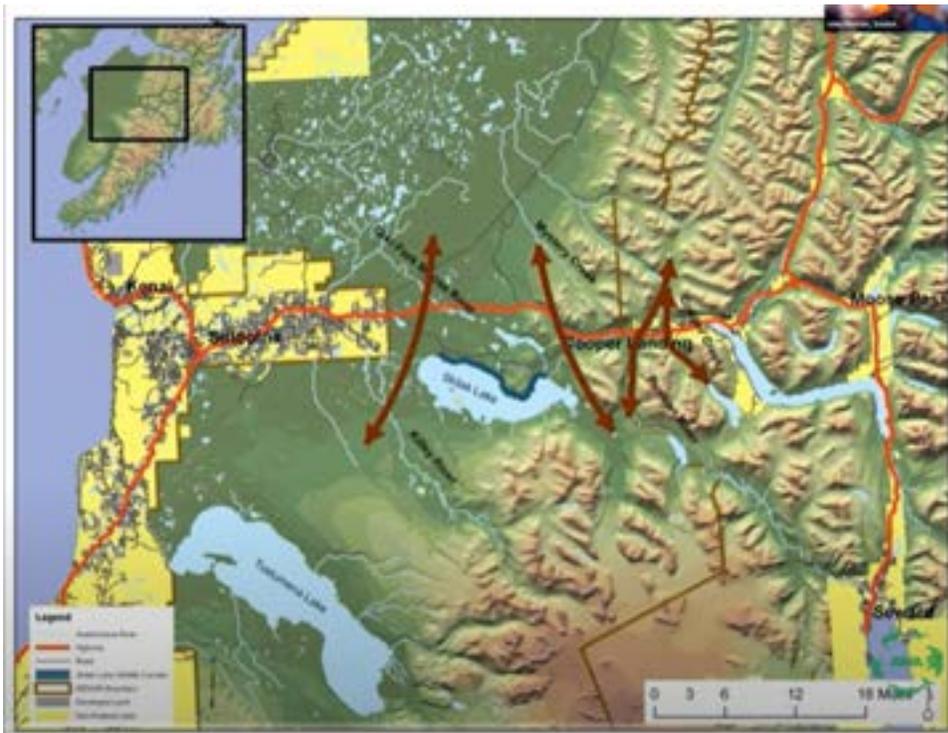
Comments on 2023 Board of Game - Southcentral Region Proposals

Alaska Wildlife Alliance **opposes** this proposal on the grounds that many “developed recreational facilities” are not maintained by the State but experience extremely high recreational use. Kachemak Nordic Ski Club and the Tsalteshi Ski Trails are just two examples of recreational areas in this GMU that see hundreds of trail users (in all seasons) each day that are not state maintained. Reducing the bait station setbacks near these high-use areas would be extremely dangerous. We would also strongly oppose a Statewide proposal to align recreation facilities to this definition, as this discrepancy would only be multiplied by the dozens of recreational clubs and areas managed by non-state entities.

Proposal 145

Alaska Wildlife Alliance **supports** this proposal. As ADF&G stated in their comments, once these crossings and their accompanying fences are built, they will “act as bottlenecks for wildlife moving across the highway corridor”. We also echo ADF&G’s statement that these areas could be highly effective and could impact non-target species.

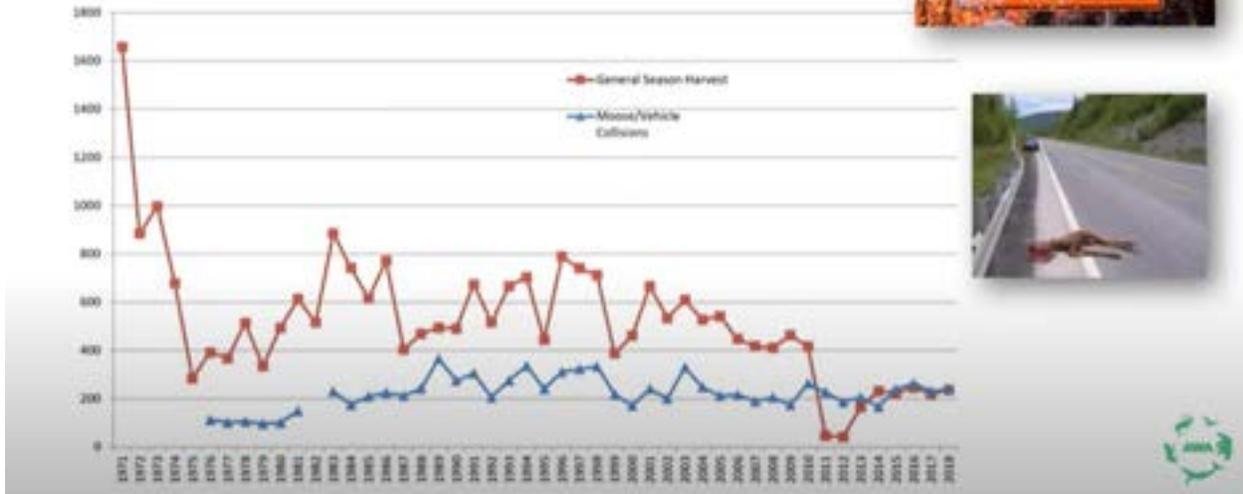
More than \$10 million dollars are budgeted to develop these crossings. Only three landscape-scale corridors remain for north-south wildlife movement (20% of the area historically available), shown in the map below.



The Sterling Highway bisects these corridors, with ~1.2 million vehicles traveling per year, averaging 2.3 vehicles zooming down the road per minute (averaged over the year, of course summer travel is higher than winter).

Comments on 2023 Board of Game - Southcentral Region Proposals

Vehicle collisions kill as many moose as harvested by hunters (~250 per year)



There are about 10 years where humans killed the same number of moose in this area through vehicle collisions as we were during the general season hunt (~250 moose-vehicle collisions per year). Vehicle collisions are more detrimental to moose populations because 90% of moose killed by cars are cows and calves, as opposed to the general season hunt which is primarily bulls.

The costs of these collisions is high for human life, wildlife, and monetarily.

Wildlife-Vehicle Collision Reduction Study: Report To Congress, FHWA 2008

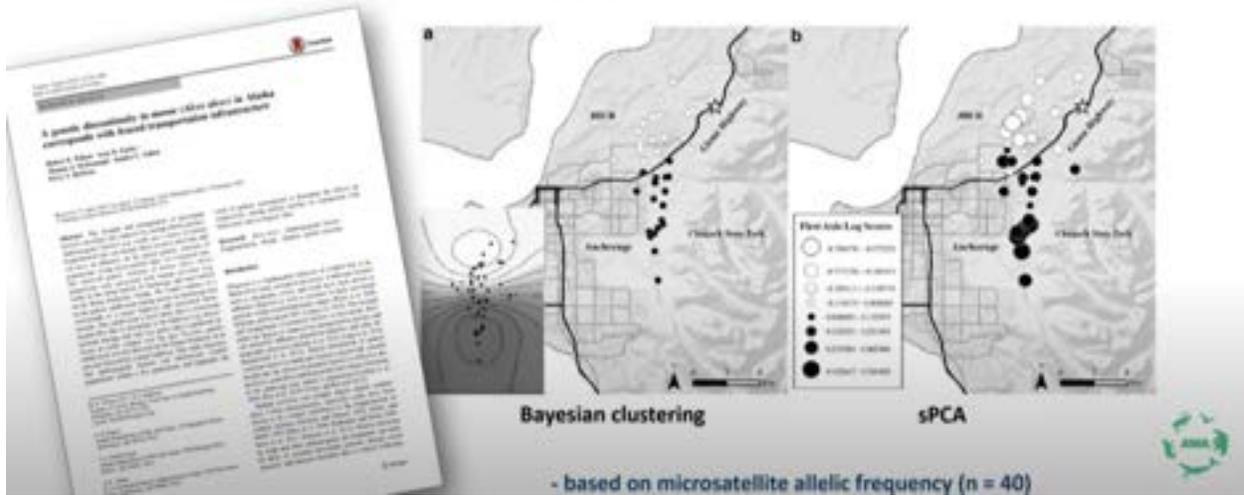


	Deer	Elk	Moose
Vehicle repair costs per collision	\$1,840	\$3,000	\$4,000
Human injuries per collision	\$2,702	\$5,403	\$10,807
Human fatalities per collision	\$1,671	\$6,683	\$13,366
Towing, accident attendance and investigation	\$125	\$375	\$500
Monetary value animal per collision	\$2,000	\$3,000	\$2,000
Carcass removal and disposal per collision	\$50	\$100	\$100
TOTAL	\$8,388	\$18,561	\$30,773

Comments on 2023 Board of Game - Southcentral Region Proposals

Without crossings, moose populations can become isolated. A study by ADFG, UAF, and USGS reflects that the moose population on either side of the Glenn Highway are becoming distinct, because wildlife has such a hard time crossing the road.

Glenn Highway divides Anchorage moose into 2 genetically distinct subpopulations



Sterling Highway MP 45-60 "Cooper Landing Bypass"



~\$10.5 million will be invested in 4 large underpasses and 1 vegetated overpass (1st in Alaska!)

The Cooper Landing Bypass wildlife crossings are circled above. Two of these crossings have already been completed:

Comments on 2023 Board of Game - Southcentral Region Proposals



Wildlife crossings have also been established on the section of the Sterling Highway that transects the Kenai National Wildlife Refuge. The Refuge reports a 50% reduction in moose vehicle collisions since their development in 2019 (between MP 58-79). Some photos from those crossings are below:



Comments on 2023 Board of Game - Southcentral Region Proposals



We want to protect all wildlife using these crossings, including moose who may be incidentally caught. In summary, these crossings will work to funnel wildlife across the road, but the more than \$10 million spent to develop these crossings will be null if there are no hunting and trapping setbacks protecting these corridors. Instead of becoming wildlife funnels, they will become wildlife sinks. We seek a common-sense approach to protecting these corridors.

Proposal 146

Alaska Wildlife Alliance **supports** this proposal. The Citizen Advisory Board for Kachemak Bay State Park is composed of 12 community members who were appointed by the Director of Alaska State Parks for up to three-year terms. These Alaska State Parks Citizen Advisory Boards assist park staff with management and development issues, acting as an intermediary for public concerns and interests. The fact that this proposal was written and submitted by majority vote of this Board speaks to its popularity and reflection of Park values.

Proposal 147

Alaska Wildlife Alliance **supports** this proposal, as it targets permanent, maintained, multi-use trails for setbacks to reduce user conflict. These winter trails are [mapped and marked](#) as permanent winter trails. The requested setbacks would not shut down trapping in these areas, but provide a corridor for non-trappers to enjoy the trails that are maintained for multiuse. This year multiple trap encounters have been reported, including three dogs that were caught within feet of the McNeil Elementary ski



Comments on 2023 Board of Game - Southcentral Region Proposals

trails. These trails have a specific dog-user parking lot for folks skiing with their dogs and there are no tethered leash laws in place for these trails.

Proposal 148

Alaska Wildlife Alliance **supports** the spirit of this proposal and encourages specificity on the trails the author seeks to protect for multi-use.

Proposal 149

Alaska Wildlife Alliance **supports** this proposal. This proposal targets high-use campgrounds, which serve as entry points for multi-use winter trails (ex: Russian River campground provides access and parking to the Russian River trails). These campgrounds are marked and permanent. While we support the Department's encouragement of ethical trapping, these regulations would compliment that encouragement with true accountability. These setback proposals do not jeopardize the department's relationship with local trappers, and would not prevent the Department from issuing permits to address specific furbearer issues. Finally, it should be noted that Federally Qualified Subsistence users, who are the local trappers, would not be impacted by this regulation. This would only limit roadside, weekend trappers from non-qualified subsistence areas.

Proposal 150

Alaska Wildlife Alliance **supports** this proposal. This proposal targets high-use pullouts frequented by locals and travelers on the Sterling Highway. While we support the Department's encouragement of ethical trapping, regulations would complement that encouragement with true accountability. These setback proposals do not jeopardize the department's relationship with local trappers, and would not prevent the Department from issuing permits to address specific furbearer issues. Finally, it should be noted that Federally Qualified Subsistence users, who are the local trappers, would not be impacted by this regulation. This would only limit roadside, weekend trappers from non-qualified subsistence areas.

Proposal 151

Alaska Wildlife Alliance **supports** this proposal for the same reason we support the above trap setback proposals. Additionally, it should be noted that these backcountry ski areas are generally in the non-motorized sections of Turnagain Pass and see very limited trapping. Backcountry skiers are breaking the up-tracks to these destinations, and many do so with their dogs. Even the Manitoba Cabins have one cabin available for people with dogs due to the demand. In the case of an avalanche, Search and Rescue teams are deployed – many of which use dogs. These areas are also used to train Search and Rescue dog teams.

Proposal 152

Alaska Wildlife Alliance **supports** this proposal. These trails are regularly groomed for skiing and frequented by locals and folks from Anchorage and the lower Peninsula.



Comments on 2023 Board of Game - Southcentral Region Proposals

Proposal 153

Alaska Wildlife Alliance **supports** this proposal. These beaches are frequented by walkers and ice skaters. We know of one dog death that occurred on the Waikiki Beach a few years ago, and other non-lethal catches of dogs on these beaches since.

Proposal 154

Alaska Wildlife Alliance **supports** this proposal. We echo Alaska Wildlife Troopers' [2022 Board of Game comment](#) to proposal 228, which requested trap signage and labeling. Their comment was:

“There are no other ways in Alaska to passively take fish/game with unmarked devices except by trapping. Crab/shrimp pots, burbot set lines, fish wheels, bear bait stations, gill nets, etc., all require markings. Trappers should be held to the same standard other resource users are. Trap/snare identification would greatly enhance AWTs ability to enforce illegal traps and incidental catches of moose, caribou, and dogs. Secondly, in the instance a trap is stolen or removed the trapper could report this to AWT much like when other resource users call to report shrimp/crab pots stolen or lost. One of the situations that is most common is when a dog is found dead in the trap and the trap is taken with the dog owner. Enforcement is unable to return the trap and there is a lost opportunity to educate and let the trapper know what happened-for the good and bad of it. AWT must also store traps with no leads with no way to return it or issue a citation if warranted. It has been rumored that trappers worry AWT would check their gear for such markings or somehow tamper with their gear. AWT would NOT routinely field check to look for ID number unless warranted. AWT spends an exorbitant amount of time trying to identify the owners of traps in both cases of violation or when stolen. Trapping does not have the same accountability as other resource users. The marking of traps/snares could be done with a unique anonymous number assigned to each trapper to prevent retribution from angry dog owners or anti-trappers if that was a concern. If the number were punched/inscribed onto the trap, it would also aid AWT in recovering stolen traps. Metal tags could also be issued from ADFG. The proposal to have an affixed or stamped means of identification would simply bring this method of take into alignment with ALL other resource users.”

Proposal 155

Alaska Wildlife Alliance **supports** this proposal.

Proposal 156

Alaska Wildlife Alliance **supports** this proposal.

Peatlands on the southern Kenai Peninsula have been drying at the rate of 6-11% in surface area per decade since the 1950s due to a 62% decrease in annual available water on the western peninsula since 1969. These peatlands are integral to salmon-bearing watersheds. The peatlands also support other key species that the people of the region depend on (moose, beaver, birds, berries), and provide a number of other ecosystem services important to people's wellbeing, including flood control, aquifer recharge, cultural and recreation centers, and serving as natural wildfire breaks.



Comments on 2023 Board of Game - Southcentral Region Proposals

Consequences of peatland drying on the southern Kenai Peninsula include increased fire risk because black spruce, a prominent encroaching tree species, is very fire prone. Additionally, a 15-year spruce bark beetle outbreak resulted in the culling of 4 million acres of trees in south-central Alaska which in some areas resulted in complete deforestation. New fledging grasslands are unprecedented and have resulted in a novel fire regime with human-caused grassland wildfires in spring, followed by the first lightning-caused grassland fires. As these 8,000 year old peatlands dry out, they become fuel bridges rather than natural firebreaks. Peatlands with a lower water table are less able to supply temperature-modulating groundwater or nutrients for salmon stream productivity.

None of these changing conditions bode well for cold-water fish –salmon and steelhead populations in particular. Most salmon species become vulnerable in waters with temperatures 68 degrees F and higher. Salmon-bearing waters on the southern Kenai Peninsula are repeatedly rising past this temperature threshold.

Since 2002, Cook Inletkeeper has been collecting continuous water temperature data below the confluence of the North and South Forks of the Anchor River. [Monitoring has revealed](#) that Anchor River temperatures consistently exceed Alaska’s standards. Temperatures above 13°C (55 degrees F) exceed Alaska’s standard for egg and fry incubation; temperatures above 15°C (59 degrees F) exceed Alaska’s standard for migration routes. Water temperatures have even been recorded above 20°C (68 degrees F) which by State Standards “may not be exceeded.” Cook Inletkeeper's research on water temperature in salmon streams suggests that “the Anchor River is highly sensitive to climate change impacts.”

Beavers are a natural ally in combating these rising stream temperatures and drying peatlands, for the benefit of fish and people. But, beavers have been trapped out of the Anchor River system and, as ADFG states, have not recolonized the river system. Salmon and beavers co-evolved in these systems, and we believe this proposal is a prime opportunity to support beaver re-colonization, which will cool water temperatures and support declining salmon and steelhead.

Without beavers, streams have become eroded and incised, meaning they cut deep channels into the landscape. These channels disconnect the stream from its floodplain, disrupting the flow of water, nutrients, and, importantly for salmon, habitat. The areas around these streams shift from thriving, diverse wetlands with pools and floodplains surrounded by trees and shrubs—to dried peatlands made up of only a few species.

Researchers at Utah State University found that an increase in beaver dams resulted in a larger floodplain and a wider channel. As water built up behind the dams, it overflowed and spread past the banks, increasing the overall area and variability of suitable habitat for salmon. This created more places for salmon to hide from predators and to find food, more places for that food itself to find food and grow, and shorter distances for salmon to travel between those areas.

Researchers also documented that the effects beaver dams on water temperature are good for salmon. Ponds from these dams increased groundwater storage. During hot summer months, the cooler water from this storage mixed with surface water warmed by the sun during the day. While still



Comments on 2023 Board of Game - Southcentral Region Proposals

high, this caused, if not a decrease in temperature (which was found to be up to 10 °C cooler in streams with beavers than in those without), at least no change in temperature. This could be huge for salmon who need refuge from hot water that is only getting hotter with the warming climate.

Cook Inlet salmon and steelhead in the Anchor are in trouble. We need to examine and explore every option available to save these important, iconic, and impressive species. Although here we only reference two published studies done so far on connections between beavers and these fish species, beaver-related restoration as a tool in salmon recovery is already being implemented in California, Oregon, and Washington.

This proposal will support beaver recolonization of an important fish system, as beaver dams generally improve habitat for rearing salmonids by storing water that can be used by juvenile salmon for overwintering ponds, particularly coho salmon; regulate water temperature; and assist in wetland formation and maintenance upstream of the structure. Nuisance beavers will not be affected by this proposal because the department can issue permits for the take of nuisance beavers as required.

Proposal 157

Alaska Wildlife Alliance **supports** this proposal.

Proposal 158

Alaska Wildlife Alliance **supports** this proposal and suggests an amendment that the Board match the wolf trapping season with the dates and restrictions listed in this proposal. We support the AC's consideration of user conflict in submitting this proposal, and believe that the proposal will be most effective, for non-trapping users and coyotes, if the wolf season is aligned.

Proposal 159

Alaska Wildlife Alliance **opposes** this proposal. The author asserts that an extended season is needed because they believe wolverines are primarily found in the high country feeding on Dall sheep and mountain goats. This is not true. Although wolverines are capable of taking large ungulates as live prey (Magoun 1985), most ungulate presence in the wolverine diet is from scavenging—with some evidence of a seasonal reliance on local rodent abundance (Banci 1987, Magoun 1985, Gardner 1985) and marmots. Removing wolverines will not likely result in more Dall sheep.

The author also asserts that the Dall sheep in the Kenai Mountains are on a steady decline while predators continue to grow. This is also not true. Wolverine populations on parts of the Kenai Peninsula were estimated in 1995 and 2004. The most complete survey, conducted in 2004, estimated a population density of 3.0 wolverines per 1,000 square kilometers in the upper Turnagain Arm and Kenai Mountains (Golden et al. 2007b). A 1995 survey, using similar methodology but restricted to the northeast corner of the Kenai National Wildlife Refuge, estimated a density of 5.2 wolverines per 1,000 square kilometers (Golden 1996). They are primarily restricted to the rugged subalpine and alpine habitats in the mountainous eastern region of the Refuge and appear to be rare on the western lowlands of the Refuge.



Comments on 2023 Board of Game - Southcentral Region Proposals

Wolverines on the Kenai Peninsula were previously considered a unique subspecies (*Gulo luscus katschemakensis*). A recent study of mitochondrial DNA suggests that despite a single unique haplotype in the Kenai population, the “occurrence of common and widespread haplotypes on the Kenai Peninsula is not consistent with subspecies status for this population” (Tomasik and Cook 2005). However, Tomasik and Cook (2005) also point out that the Kenai Peninsula population may harbor a disproportionate amount of the North American mitochondrial diversity and, as such, warrants special conservation.

The wolverine’s affinity for remote wilderness, rugged terrain, low densities, and large home-range sizes, coupled with its sensitivity to human disturbance, all contribute to the challenge of managing and conserving this solitary and secretive species (Ruggiero et al. 1994 cited in Tomasik and Cook 2005). Because wolverines have few natural predators, harvest by humans is believed to be the greatest factor influencing adult wolverine numbers (Hornocker and Hash 1981). Krebs et al. (2004) indicated that human-caused mortality was additive to natural mortality and that trapped populations of wolverine would decline in the absence of immigration from untrapped populations. However, as long as there was a source meta-population within a protected nearby refugium, harvested wolverine populations would likely persist. As with other low-density species, maintaining high annual survival of adult females is central to sustaining populations and harvest (Eberhardt 1990, Golden et al. 2007a).

We share the author’s concern about sheep populations, and encourage further research to understand the impacts of climate change and *Mycoplasma ovipneumoniae* on sheep. We believe these are the primary drivers of their population decline, not wolverine predation.

Proposal 160

Alaska Wildlife Alliance **supports** this proposal on the grounds that beavers are important, keystone species for salmon production and require additional protections in the Anchor River to support their recolonization (see comments on Proposal 156). This regulation would reduce the chances of over-trapping beavers and has been successfully applied in GMU 15B. Trapping will still be permissible, this proposal simply prevents multiple sets on a single lodge.

Proposal 162

Alaska Wildlife Alliance **opposes** this proposal. Increased harvest in February and March has the potential to negatively affect overall population levels because harvest during this time is removing birds that have survived into the next breeding season. Hunting during this time is highly effective and accessible, as snowmachines have ready access to virtually all of this area. Although there are no conservation concerns for this population now, we echo ADFG’s concern that an extended season with high bag limits would result in a conservation concern.

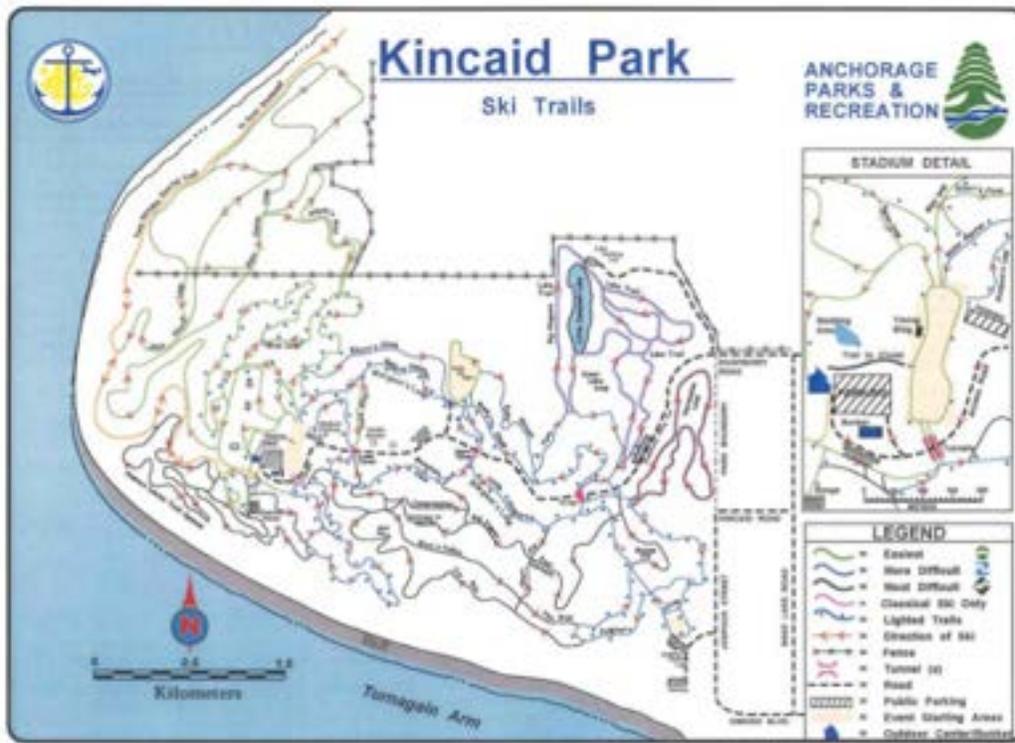
Proposal 200

Comments on 2023 Board of Game - Southcentral Region Proposals

As written, Alaska Wildlife Alliance **opposes** this proposal. It would appear that this hunt would apply anywhere, including closed areas such as the Anchorage Management Area, and others where special controls apply, and is objectionable for that reason.

Proposal 203

Alaska Wildlife Alliance **opposes** this proposal. We understand the author’s intention to provide opportunity in an area that seems abundant for moose, but the recreational use of Kincaid Park, we believe, is too high to safely permit a hunt. Between the wide ski trails used by primarily walkers year-round (see below)



And mountain bike trails, also used year round (see below)



The park is highly used year-round. We're not sure how the department or Parks could divert recreational users from a hunt area during the hunt.



The Alaskan Bowhunters Association

Comments to the Alaska Board of Game

Southcentral Region

Soldotna, AK. March 17-21, 2023

Submitted March 3, 2023

To the Alaska Board of Game,

The Alaskan Bowhunters Association (ABA) is a membership 501C-4 nonprofit organization representing bowhunters from all over the nation who choose to pursue game in Alaska with the bow and arrow. Our mission is "To foster and perpetuate fair chase hunting with the bow and arrow". We thank the Board of Game for the opportunity to comment on proposals in advance of the upcoming 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 their 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 oneself, while at the same time having a limited impact on the resource. To many of us, bowhunting seems to be inherently a fairer 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 one's 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 has established long archery seasons both before and after their general seasons.

The following comments reflect our stance on upcoming proposals for the Southeast meeting. We hope that the Board of Game seriously considers what our organization and membership have to say regarding these matters.

Proposal 71 SUPPORT

Proposal 71 asks for the establishment of a new drawing permit hunt for elk on southwest of Afognak island with up to 10 total permits being issued. The low success rates of archery equipment would guarantee very low harvest rate, but the added hunting opportunity would be greatly appreciated and utilized by bowhunters. The Alaska Department of Fish and Game (ADFG) Supports this proposal due to the added opportunity and does not believe it will have any impact on their management objectives. In the interest of more hunting opportunity with no negative impact, we ask the Board to adopt Proposal 71.

Proposal 72 SUPPORT

Proposal 72 is very similar to proposal 71 except that it is for Raspberry Island and would be up to 6 permits. For the same reasons as outlined for proposal 71, we ask that the Board adopt Proposal 72.

**Proposal 87 SUPPORT**

Proposal 87 is to create an early archery season for moose in Game Management Unit (GMU) 14C remainder similar to those already existing seasons in GMU's 14A and 14B which border this GMU to the North and GMU's 15A & 15B which are just across the inlet to the South. The existing early archery seasons have the same antler restrictions as the later general seasons and have a much lower success rate due to the limitations of archery equipment. ADFG supports this proposal because of the added opportunity and low impact. If the Board were to adopt this proposal, it would afford hunters in GMU 14C remainder the same opportunities as those in GMU's 14A, 14B, 15A, 15B & 16A.

Proposal 91 SUPPORT

Proposal 91 asks to add archery equipment as legal method of take to an already existing hunt. This hunt is drawing permit DL455 for black bear on JBER. Currently, this hunt is open only to shotgun while most other JBER hunts are open to the use of archery equipment. We ask that archery equipment be allowed in this hunt in addition to shotgun in order to allow those who draw to have more choices in the weapon they use. This proposal does not create any biological concerns and is supported by ADFG.

Proposal 92 SUPPORT

Proposal 92 is identical to proposal 91 except that it is for drawing permit hunt DL457. We ask that you adopt this proposal based on the same reasoning as for proposal 91.

Proposal 99 SUPPORT

Proposal 99 would create a new drawing permit hunt for brown bear for the same area as DL457. This area is already open for the take of black bear and it only makes sense to allow for bowhunters to target brown bears as well. ADFG supports this proposal and has no biological concerns.

Proposal 100 SUPPORT

This proposal is to establish an archery only drawing permit hunt for brown bear on JBER. There is definitely a brown bear presence on JBER and an archery hunt with a bag limit of one bear every 4 regulatory years would not have a significant impact. ADFG supports this proposal.

Proposal 101 SUPPORT

Proposal 101 is for extending the current brown bear season in GMU 14C remainder for certified bowhunters only. An extended archery hunt in this remote area would not have any impact on brown bear populations but would allow for additional hunting opportunity. ADFG supports this proposal and has no biological concerns.

**Proposal 110 SUPPORT**

This proposal is to create an archery only registration hunt for sheep in GMU 7 remainder. This would provide additional hunting opportunity and have no impact on sheep populations due to the limited effect of archery equipment and the full curl regulations in place. ADFG does not have any biological concerns for this proposal.

Proposal 111 SUPPORT

Proposal 111 is to create an archery only registration sheep season in GMU's 7 and 15 remainder. We ask that you support this proposal based on the same reasoning based on proposal 110. ADFG does not have any biological concerns for this proposal.

Proposal 112 & 113 SUPPORT (with possible amendment)

Proposal 112 & 113 are for the establishing of a general archery only sheep season following the current season for the same areas as outlined in proposals 110 and 111. It is interesting that ADGF is neutral and has no biological concerns for proposals 110 and 111 but is opposed to 112 and 113 based on declining sheep populations. ADFG contradicts themselves by saying there is no biological concerns for proposals that cover the same areas and are for archery only. If there is a biological concern for hunting sheep in GMU 7 and 15, amending these proposals to change the last ten days of the current sheep season to archery only may be a better solution. This would allow for continued hunting opportunity while at the same time, lowering the impact on the population. However, we fail to see how any additional bowhunting under full curl regulations would have any negative effect on sheep populations based on ADFG's current management strategies.

Proposal 119 SUPPORT

This proposal would create an early archery moose hunt similar to those already in place in GMU's 15A and 15B. We ask that you adopt this proposal based on the same reasoning as proposal 87.

Proposal 124 SUPPORT

Proposal 124 would establish an early moose archery only season in GMU 15C remainder, similar to that in proposal 119. We ask that you adopt this proposal based on the same reasoning as can be found in proposal 87.

Proposal 140 SUPPORT

This proposal will extend brown bear season under RB300 but the extension would be for archery equipment only. We do not believe there will be a significant impact on brown bear populations based on the limited efficiency of archery equipment. It is important to note that there are several other proposals to extend this season without any weapons restrictions. We support extending this season regardless of weapons allowed as long as there are no biological concerns or loss in hunting opportunity. This proposal would be a good compromise if the board feels the other proposals to be too liberal.



Proposal 82 OPPOSE

This proposal would expand unrestricted weapon drawing permit hunts for sheep into an area that is currently archery only. This would have a negative effect on hunting opportunity. This area is for bowhunting only for a reason and should be kept that way.

The Alaskan Bowhunters Association thanks you for your consideration on these proposals.

Respectfully,

Mike Harris - Legislative Vice President, Alaskan Bowhunters Association



PC013

Submitted by: Chelsea Allen

Organization Name:

Community of Residence: Homer, AK

Comment:

I support the proposal to move trapping equipment 100 yards away from ski, hiking and multipurpose trails to avoid/prevent injury/death to our dogs/animals.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 146: Support Proposal 147: Support



PC014

Submitted by: John Almanrode

Organization Name:

Community of Residence: Cooper Landing, Alaska

Comment:

I support Proposals 145 through 154 dealing with trapping set backs. As a resident of Cooper Landing I recreate all around the Kenai Peninsula. I do not want to be worried that I might get caught in a trap have a pet get caught in a trap as I am out enjoying the wilderness. It is no longer the 1800's or the 1900's and the population on the peninsula has obviously grown and the winter recreation opportunities have grown as well. These proposed set backs are so minimal that trappers should not feel that they are overly restrictive in any way. Please consider these proposals for the safety of all winter outdoor recreators and their pets. Thank you.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC015

Submitted by: Julie Almanrode

Organization Name:

Community of Residence: Cooper Landing

Comment:

I support Proposals 145,149, 150, 151,152,153&154. With the growth of the community and winter activities, there needs to be some ethics established so that everyone, including trappers, can enjoy the great outdoors together.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC016

Submitted by: Mike Amos

Organization Name:

Community of Residence: Cooper Landing

Comment:

I'm commenting in full support of Proposal #145; this proposal should be a "No-Brainer" by not allowing hunting and trapping 1/4 mile of wildlife crossings. The new bypass is going to be enough of a stressor on wildlife and then be forced to travel through a choke point on top of it.

I'm in full support of proposals #d 146, 147, 148 I have a residence in Homer also and I can't enjoy trails in Cooper Landing or Homer because of the fear of traps set too close to trails and the small number of active trappers on the Kenai Peninsula have a strangle hold on the rest of the population. What I don't get is that the Safe Trails Committee in Homer had the support of their AC and it sounds like someone got to them and they are no longer supporting them.

I'm in full support of proposals #149 - #154 being a homeowner in Cooper Landing we can't use our trails here either for fear of traps and a very small number of trappers are holding the rest of our townfolks "Hostage"! Whats really sad is that Cooper Landing Safe Trails can not get the support of our local AC which is not representative of the population of CL since the board is made up of consumptive users and no recreational people are on the board. Constant push back, bullying, belittling and whatever excuse they can come up with to not support these proposals. Now is the time to come together and come to a solution thats acceptable to both sides.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



Alaska Board of Game

March 2, 2023

PO Box 115526
Juneau, AK 99811-5526

Re: BOG South-central Region Meeting

Proposals 164-170: proposals regarding reduction of bag limits for Goldeneye, Bufflehead, Harlequin and Long-tailed Duck: **SUPPORT**

Proposal 171: Direct ADF&G to implement a method for accurate reporting of sea duck harvest for Units 6,7 & 15 **SUPPORT.**

Proposal 172: Require mandatory harvest reporting for sea ducks in Kachemak Bay Unit 15C **SUPPORT**

Greetings,

I strongly support the above proposals to better manage a healthy population of the above waterfowl.

I also **STRONGLY SUPPORT PROPOSAL 146.**

Require a 100-yard setback of traps from the Diamond Creek Trail, Grewingk Glacier Lake Trail and the Grewingk Saddle Trail within Kachemak Bay State Park. These trails are heavily used by the public during trapping season, accompanied by their dogs.

- More than 8 pet dogs have been trapped recently on popular Homer trails. This is a real problem!
- With a growing population on the lower Kenai Peninsula, and particularly in Homer, an increase in non-consumptive users on multi-use trails, conflict in trapping areas is becoming more common in Unit 15C. If nothing is changed, more dogs will be trapped, causing unnecessary harm to State Park users and dogs, and huge public outcry.
- User conflicts are time consuming and energy draining for all involved. Already overtaxed and underfunded, ADF&G employees and State Park staff will be increasingly burdened.

Respectfully Submitted

Robert Archibald

Robert E. Archibald



Submitted by: Jacob Argueta

Organization Name:

Community of Residence: Homer, Alaska

Comment:

Literature indicates that allowing beaver to reinhabit their historical range, specifically here on the Kenai Peninsula, would have a myriad of benefits including aiding in water retention and regulation, increased habitat for other native species, and carbon sequestration. Limiting beaver takes could allow for beaver to expand into their historical range more effectively. Limiting beaver takes and allowing for range expansion could provide an economic, biologic, and societal boon that far out ways any current benefits associated with the standing regulations.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 160: Support



Submitted by: Michael Armstrong

Organization Name:

Community of Residence: Homer, Alaska

Comment:

Comments on Proposals 146, 147,149, 152 153.

I support these proposals to create trapping setbacks from trails in Kachemak Bay State Park and ski trails in the Homer area. I also support setbacks in the Cooper Landing Campground, the Cooper Landing Trails, and the Kenai Lake Beaches.

I have lived on Diamond Ridge since 1994, and have hiked and skied in the area. We have granted permission to the Kachemak Nordic Ski Club to use our property for its Marathon ski trail. When that trail is set, we frequently ski it with our well-trained dog.

Over the years, trappers have set traps within 10 yards of the Marathon trail. These traps have not been identified by signage, and several times our neighbors' dogs got caught in the traps. The Diamond Ridge area is becoming more settled, with active recreational use.

Much of the land is unmarked private land, but if irresponsible trapping continues, trappers can expect to see private land and access locked up,

These proposals allow trappers continued use while protecting dogs and people who go off trail. Responsible and ethical trappers know not to set traps near recreational trails. These proposals enforce ethical practices on novice or amateur trappers who might not yet be familiar with good trapping practices.

The proposals also have the benefit of protecting trapping as a subsistence and income livelihood so that the public does not damn all trappers and trapping for the actions of a few.

Thank you for considering this reasonable compromise between banning trapping outright and allowing unrestricted, dangerous use.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 146: Support Proposal 147: Support Proposal 149: Support Proposal 152: Support Proposal 153: Support



PC020

Submitted by: Kari Arno

Organization Name:

Community of Residence: Homer, AK

Comment:

I am against the 100 yard set back.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 146: Oppose Proposal 147: Oppose



PC021

Submitted by: Mike Arno

Organization Name:

Community of Residence: Homer Alaska

Comment:

I am against the restrictions on trapping in exchange for the right to let dogs run loose on public trails with snow machine's and skiers. snow machines and loose dogs on the same trails are a very unsafe combination.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 146: Oppose Proposal 147: Oppose



PC022

Submitted by: Barbara Atkinson

Organization Name:

Community of Residence: Cooper Landing

Comment:

Please note that I am in support of proposal #145, 149,150,151,152,153,154, 146,147,and 148.

Our dog was caught in a snare not far off a trail and the trapper didn't check his traps for 10 days. Amazed the dog survived.

Barbara Atkinson

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC023

Submitted by: Thomas Atkinson

Organization Name:

Community of Residence: Cooper Landing, Alaska

Comment:

I am in support of Trap Setback purposal # 145, 149, 150, 151, 152, 153, 154, 146,147, 148.

Trappers need to be mindful of Multi use areas.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC024

Submitted by: Brandy Avril

Organization Name:

Community of Residence: Anchorage Ak

Comment:

As a cabin owner in the south Caribou Hills, and a dog owner I HIGHLY OPPOSE BOTH Proposal 146 and 147. Our dog sometimes runs along the snow machine and 4 wheelers as we head out to our cabin almost weekly. We have had previous sightings of traps right next to the trail with scents which can attract the dogs. Thankfully, we were able to keep the dog away from the trap. It concerns me that they are allowed to trap right next to any trail. Really no reason for that. Most trappers have a snow machine and/or wheeler which allows them to get further out into the hills and non populated areas to set their traps and run their trap lines. A 100 ft setback is very do-able and really not an inconvenience to a trapper.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 146: Oppose Proposal 147: Oppose



PC025

Submitted by: James Majetich

Organization Name: Backcountry Hunters and Anglers

Community of Residence: Palmer, Alaska

Comment:

My name is James Majetich, the Chapter Coordinator for Backcountry Hunters and Anglers in Alaska, and I am writing to voice my wholehearted opposition to the proposed trap setback regulations that were received by the Board of Game.

In proposals 146, 148, 150, 151, 152, and 153 it is implied that the responsibility for safe use of public lands throughout several areas on the Kenai Peninsula rests solely on the shoulders of one specific user group.

In proposal 146, the author acknowledges the difficulties in funding signage requirements as well as the difficulties in enforcing leash laws and in using a leash while partaking in backcountry activities such as cross country skiing, so therefore any restrictions would likely not be adhered to. I believe that it is categorically wrong to levy new restrictions on one user group under the premise that another simply would not comply should the be given any regulation themselves.

Aside from being exceptionally discriminatory to one user group, these proposals would also greatly reduce trapping opportunities that pose little to no danger to domestic dogs such as submerged, elevated, under ice and enclosed traps.

A significantly better alternative would be for all user groups to follow the lead of the trappers and work to educate the public about being responsible and respectful multi-users of Alaska's trails as opposed to seeking to limit the opportunities of others.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 146: Oppose Proposal 148: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose
Proposal 153: Oppose



PC026

Submitted by: Loretta Ballance

Organization Name:

Community of Residence: Fritz Creek/Homer, AK

Comment:

PROPOSAL 146 5 AAC 92.550, Proposal 146 and 147:

Oppose.

Animal ownership has requirements. Period.

Trapping has seniority, usefulness and purpose. Close the area to recreation without setting responsibilities/liabilities/laws for tourist/recreators. A set sprung by an unleashed dog should require compensation and an apology to the trapper, just like in domesticated areas where unleashed dogs are a legal liability whose wrong doing's require compensation, and perhaps other legal action. The trap lines need protected from disrespectful tourist recreators who should carry insurance to cover the losses they create for others.

Tourists want to steal a way of life from others, and to steal what others have created and made safer, and want to not pay for the damage they cause to the land and to others. Tourists are expensive predators to have around, they are careless predators that expect to be served up whatever they want, regardless of the drain on the environment, the existing maintenance systems, or the expense to society. It is sad that the tourist thinks they are not responsible for the harm they cause, and that they want to make others bend to their wants. Tourists want others to change, to forfeit, to lose so they can let their stupid dog have it's way with other people's constructs, creations, or lifestyle.

So, why not just let farmers graze their livestock on your lawn, or eat your landscaping, or root in your garden? That would be fair--if farmers thought like tourists, correct? Farmers don't do that on purpose, because farmers have been taught to be responsible and to know that they have to pay for their 'harms'.

Tourists should pay for their special access needs, and they should pay for special trails to be built away from those they would harm with their demands, and they should pay for the demands they place on the rest of the social structure.

It' about power over others, about control, about squeaky wheels, about stupid dogs causing problems for themselves and others in the wilds just like they do in the domesticated world.

Bind the power over the dog, control the dog.

P.S. Given the volatility of our society in these squishy days of delusions, unenforced law, and unstable perceptions, "inflammatory remarks or inappropriate language" might need to be clarified with more specific definitions. Thank you.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 146: Oppose Proposal 147: Oppose



Submitted by: Elijah Barbour

Organization Name:

Community of Residence: Soldotna

Comment:

Proposal 57

As an avid outdoorsman and dog handler I support proposal 57. A well trained versatile hunting dog can be used to recover not only waterfowl and upland birds, but wounded and dead furbearers as well.

Recovery of game should be first and foremost in all aspects of hunting and/or trapping, and the way to ensure recovery of said game is with a trained versatile hunting dog.

Why in any scenario would we want a fatally wounded animal to escape only to go to waste? As ethical sportsmen and women, we should be responsible for what we take and that responsibility should be aided with the effective tools to successfully implement active recovery of these wounded animals. Versatile hunting dogs are those tools.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 67: Support Proposal 71: Support Proposal 72: Support Proposal 82: Oppose Proposal 87: Support
Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 99: Support Proposal 100: Support Proposal
101: Support Proposal 110: Support Proposal 111: Support Proposal 112: Support Proposal 113: Support Proposal
119: Support Proposal 120: Support Proposal 121: Support Proposal 122: Support Proposal 123: Support Proposal 124:
Support Proposal 125: Support Proposal 126: Support

Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 028

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.

Please select the proposals that you are in support of (select all that apply).

If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.

- # 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- #149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. *300 yds*
- # 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. *300 yds*
- #151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain. *300 yds*
- #152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. *300 yds*
- #153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. *300 yds*
- # 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

Other areas setback proposals:

- #146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail. *300 yds*
- #147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails. *300 yds*
- # 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward. *300 yds*



Comments:

100 yards isn't enough. Please consider 300 yds.

Dogs can travel 100 yds in seconds

(feel free to add extra pages of comments)

Printed Name (First and last)*: Sean Barnett

Organization (if any):

Signature*: Sean D. Barnett

Email*: [Redacted]

Street Address: [Redacted]

City*: Cooper Landing State*: AK Zip code: 99572

*Indicates it must be filled in to be accepted.



Submitted by: Daniel Basargin

Organization Name:

Community of Residence: Homer

Comment:

I agree with all of these proposals.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 118: Support Proposal 119: Support Proposal 120: Support Proposal 121: Support Proposal 122: Support Proposal 123: Support Proposal 124: Support Proposal 125: Support Proposal 126: Support Proposal 127: Support Proposal 128: Support Proposal 129: Support Proposal 161: Support



Submitted by: Ross Beal

Organization Name:

Community of Residence: Fairbanks, Alaska

Comment:

PROPOSALS 145 THRU 154

I appose these proposals. Mention of precedent set by closing trapping and set-backs by any municipality are attempts to regulate trapping. The state constitution has given the authority to regulate Alaska's Fish and Game to the Alaska Board of Game only. I'm not aware that these municipalities have ever worked with the Alaska Board of Game in an attempt to resolve any foreseen or real problems with current trapping regulations.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Oppose Proposal 146: Oppose Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose



Submitted by: Cristine Beaudoin

Organization Name: na

Community of Residence: Homer, AK

Comment:

I absolutely support proposal#146 and #147. Trapping and recreational activities do not mix. Even 100 yd setback isn't far enough for the nose of most dogs. Public trails are not the place for trapping and currently very dangerous for those of us that use them, while recreating with our dogs. The question in my mind is why a trapper would even consider setting up a trap line near populated trails in the first place.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 146: Support Proposal 147: Support



I would like to address proposals 146-153 and my opposition to them as they seem to deal largely with setbacks from various trails, campgrounds, buildings and roads. I oppose proposals incorporating setbacks into trapping regulations. In my experience setbacks will have little to no effect in preventing accidental catches and will become an unnecessary burden on those that enjoy the recreation of trapping in Alaska.

Many of these proposals seem to support a disproportionate responsibility be placed on the trapper to avoid accidental catches of pets, but they dismiss the fact that the owner of the pets also carry a responsibility to watch and keep track of their pets. I completely understand the desire for pets to be safe and stay out of traps while allowing them freedom to be unhindered out in nature. I enjoy allowing my pets to accompany me without a leash much of the time. However, I also understand that by doing so I have a responsibility to take steps to safe guard my pet from harm. These proposals seem to desire this responsibility be transferred to another group, in doing so is limiting their freedoms, in my mind this is unfair and unjust.

Having owned a number of great dogs over the years it has been my experience that they love to follow trails. If they were not leashed or trained to listen, my dogs would follow a trail, whether foot, snowshoe or machine without hesitation. Should a setback be established and a trap placed at the legal distance, a pet, primarily a dog, I believe, will follow the trail established by the person that set the trap. This will then result once again in accidental catches and again the trapper will be blamed. But in reality, it is the owner that is at fault for failing to take steps, of which there are many, to safeguard the pet. As a trapper, I don't want to catch pets and take steps to avoid catching them. I don't trap directly on groomed trails used for skiing and snowshoeing, nor do I trap at trail heads. It takes time, effort and work to trap and I have no desire to waste that time by catching pets. However, I also would like to have the opportunity to recreate and enjoy trapping without undue burden being placed upon myself and family as we enjoy trapping here in Alaska.

Proposal 154

I would like to speak regarding my opposition to proposal 154 as well. While this proposal seems like a positive and logical approach, it is neither. In my experience having to notify the public of traps in an area will assist people in tampering with legal trap lines. It seems to also be another effort to put excessive pressure and burden on a group of recreational users to lessen responsibility on other groups.

As an example, just this season on a trail my son and I established far from normal recreation trails we went to check our traps only to find some people went down the length of the trail snowshoeing. This wasn't an issue until I found that as they went down the trail they used their trekking poles to trip each trap they found. I reset my traps and prepared for lynx season. In early Feb I once again went to check these traps only to find what appears to be a lynx was stolen out of the trap. At another location I had a wolf trap, chain and drag stolen as well. After these instances I don't feel labeling our traplines is a burden the trapping community should bear. I personally can't afford to set cameras throughout my lines yet in an effort to safeguard my legal right to trap.



In closing some of these proposals site the activities “*of winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals*”. These activities however do not require setbacks from trails to be safely enjoyed. The issues, once again, result from pet owners being irresponsible concerning their pets. Proposal 150-154 also incorporates some data regarding dog catches. It reads as follows; “*As of late February 2022, seven dogs have been caught in traps throughout Southcentral Alaska, and two dogs were killed, as reported via the Alaska Press.*” Southcentral Alaska is a large area, with what I guess to be a good number of dog owners that share many different trails with trappers. While I don’t have exact numbers for dogs or trappers in the specified area, 7 caught and 2 passing away seems that it would be a pretty low percentage compared to the number of dogs and trappers using the trails. This would seem to suggest it is unnecessary to add additional burden to trappers by establishing wide sweeping setbacks.

In the same proposals the phrase, “To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area...” Is used several times. Once again none of these activities requires trail setbacks. However, it does make me wonder why trapping isn’t among these. My kids and I love trapping and although my wife doesn’t come along on the line she makes lunches and loves to see what our investment in finances, time and energy bring.

Thank you for your time

Tom Bobo



PC033

Submitted by: Jack Bradley

Organization Name:

Community of Residence: Moose Pass, Alaska

Comment:

I am commenting in support of proposals 145 through 154. The Kenai Peninsula is Alaska's Playground, which means it is imperative that it is kept safe for all - hikers, bikers, fishers, beach-goers, tourists, dogs, children, and everyone else. I have been a resident of the Kenai Peninsula for 5 years and in my relatively short time here I have heard too many stories of injuries and deaths dogs have sustained by improperly or illegally placed traps. There is no reason that I can understand that trappers in the largest state in our Union need to encroach further on the high-traffic, public use lands mentioned in these proposals. We are so lucky to live in a state with endless abundance and opportunities for recreation, hunting and trapping, but we must ensure these activities and the people who engage in them can do so harmoniously, without putting people and their pets in unnecessary danger. I very much fear that encroaching trapping regulations will lead to an avoidable increase in injury both to people and pets.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC034

Submitted by: Stephane Brault

Organization Name:

Community of Residence: Anchorage, Alaska

Comment:

Proposal 56: Prohibit taking of big game from boats in Units 6, 7, and 15 . Taking of big game from boats rarely, in my opinion put the hunter in an stable shooting scenario and result in increase of wounded and/or non retrieve animal.

Proposal 61: Lower the resident and nonresident general season bag limit for deer in Unit 6 . A lower bag limit will allow for an increase in hunting opportunity for a higher number of hunter.

Proposal 147: Establish trapping setbacks along certain snow machine and Nordic ski trails in Unit 15C. Setback will increase safety of trail user and will not be an unreasonable burden on the trapper.

Proposal 148: Require 100-yard trapping setbacks from known multi-use trails in Unit 7 Setback will increase safety of trail user and will not be an unreasonable burden on the trapper.

Proposal 149: Establish trapping setbacks along the perimeter of campgrounds in Unit 7 Setback will increase safety of trail user and will not be an unreasonable burden on the trapper.

Proposal 150: Establish trapping setbacks along certain roads and pullouts in Unit 7 . Setback will increase safety of trail user and will not be an unreasonable burden on the trapper.

Proposal 154: Require signs be posted at all active trapping access points in Unit 7 .

This proposal will increase awareness and safety with very little effort from trapper

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 56: Support with Amendment Proposal 61: Support

Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 154: Support



PC035

Submitted by: Melissa Brennan

Organization Name:

Community of Residence: Cooper Landing, AK

Comment:

Support trapping setback signage in Cooper Landing recreation areas, proposals 149-154

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC036

Submitted by: Amy Brodersen

Organization Name:

Community of Residence: Cooper Landing, Alaska

Comment:

As a full-time resident of Cooper Landing, and an avid back country enthusiast, I spend a majority of my time out enjoying the areas public lands. In order to increase public safety for ALL recreational user groups within Cooper Landing and the nearby Summit Lake Recreation Area, I am in support of trapping set-backs along multi-use trails and back country access points. My support for trapping setbacks in the Cooper Landing area is not to end trapping, but to reduce conflicts between a small minority of trappers and a large and increasing majority of other recreational user groups.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



Submitted by: Alton Brown

Organization Name:

Community of Residence: Palmer, AK

Comment:

To whom it may concern,

I am writing on behalf of the proposal to close sheep hunting in 19C. While it's no secret that sheep numbers are hurting in the area and across the state, closing the season would have no beneficial impact on the herd. Sheep management is already struggling across the state due to a lack of funds. Closing the season for 5 years would directly take out around \$500,000, just from our outfit, that is being brought in by non-resident hunters. These dollars directly go into the local economy and management of the herd. One non-resident hunter brings in between \$40-50,000 per sheep hunt. That money goes into tags, outfitters, and Alaska's economy. I imagine a significant portion of that cost has taxes from the Pittman-Robertson act as well. It would be foolish to stop bringing in this essential funding for our sheep herds.

Instead of closing the season, what myself and other guides/outfitters would like to see is increasing the cost of resident sheep hunting. Residents are spending about \$1000 on the high end for a sheep hunt they get to do every year. Since the funding of sheep management is struggling so bad, adding tags that resident hunters would need to buy would increase the funding tremendously.

Another thing I would like seen done is adding a mandatory field day/quiz for anyone who buys a sheep tag. Including guides. The biggest harm we can do as hunters to the sheep herd is shooting sub-legal rams. A lot of the people going on these sheep hunts have never even seen a ram. Having a field day where they come in and learn about sheep biology and get to put their hands on legal vs sub-legal rams would have highly beneficial.

Thank you for taking the time to read my comment. I hope the Board uses reason and not emotions when voting on all these issues.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 204: Oppose



PC038

Submitted by: Josiah Brown

Organization Name:

Community of Residence: Cooper Landing

Comment:

Hello the majority of residents of Cooper Landing are in favor of setbacks of traps on popular multi use trails. A survey was conducted to prove this.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC039

Submitted by: Jeffrey Bryden

Organization Name:

Community of Residence: moose pass, AK

Comment:

Support proposal 119. I would like to see a Unit 7 early season moose archery option that matches what the unit 15 A and B area is. I would like to hunt the unit 7/15 border area. The same moose live and use both of these areas.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 112: Support Proposal 113: Support



Submitted by: Jon Burrows

Organization Name:

Community of Residence: Port Alsworth

Comment:

I oppose Proposition 204 as it is written which would seek to close all sheep hunting in unit 19C to residents and non-residents for 5 years.

My view comes from guiding and spending time in unit 19C for the past 10 years. While overall sheep numbers are declining in much of the unit, I see self regulation and cutting back of guides and residents (which is happening) coupled with the existing full-curl rule that will help regulate the harvest and also won't completely remove all user groups from the chance to hunt a legal ram.

The full curl regulation that was implemented in 1992 is the check-valve designed to protect young rams from harvest and give them the opportunity to live and breed (raise population) and also focuses the hunter's efforts on taking older, mature animals which are generally more likely to die in a harsh winter.

This rule is what allows hunting opportunity but does not guarantee that there will be a lot of harvestable, legal rams available. It says hunt and take the legal rams but if there aren't many legal rams- back off, hunt less, take fewer clients. That has been happening: the outfitter I work for has taken less than half the number of hunters this season as past seasons and I know firsthand other hunters are doing the same. The full-curl rule is what should dictate there are fewer harvestable rams, not putting a full 5 year closure to even have the chance to hunt.

It's obvious to anyone who has spent more than a few seasons in this area that overall sheep numbers have been in decline. The older ram class is depleted but we have also found dead heads from young rams and ewes indicating other factors in sheep die-off.

We can't protect Dall sheep from the severe winter weather that often kills them and I don't think that by this regulation alone we can play a significant role in bringing numbers back. It does play a small role but I don't think that offsets the cost of full closure and the hunting pressure that will shift elsewhere.

I don't have the full answer on the challenges of Dall sheep management during these lean and rough years but at this time I oppose the radical step of a full 5 year closure for all users in unit 19C.

Thank you,

Jon Burrows

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 204: Oppose



PC041

Submitted by: Les Butters

Organization Name:

Community of Residence: Flagstaff, Arizona

Comment:

Limiting non-resident moose hunters to 20 in Unit 19C by draw is unreasonable. There are numerous other measures to consider to lessen moose harvest, hunting pressure and decrease predation. I have hunting 19C for 20+ years and have seen the extensive increase in wolf and bear populations. Allowing non-residents to harvest a Grizzly by applying a moose tag would lessen moose harvest and decrease Grizzly populations. Placing the non-resident draw with a higher permit number but limiting party size to (4) four will reduce moose harvest...

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 205: Oppose



PC042

Submitted by: Janette Cadieux

Organization Name:

Community of Residence: Cooper Landing, AK

Comment:

Our community has voted to support Proposals 145, and 149-154 because they make sense for both trappers and other users of the lands surrounding our community. This sensible regulation similar to that in other states and other communities should be adopted. Proposal 145 should be amended to include all upsized culverts and trail underpasses within the same MP 45-60 project area.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support with Amendment Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



Submitted by: Diana Carbonell

Organization Name:

Community of Residence: Fritz Creek

Comment:

I write in support for proposals #145, #146, #147, #148, #149, #150, #151, #152, #153, and #154. I want to be able to use public trails without the fear of my pets being maimed or killed by traps. 100 yard set backs seem like a very reasonable compromise between the tiny number of people who trap and the overwhelming number of Alaskans who use trails for skiing and hiking

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.

Please select the proposals that you are in support of (select all that apply).

If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.

- # 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- #149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- # 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- #151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- #152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- #153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- # 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

Other areas setback proposals:

- #146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- #147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- # 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 044

Most ethical trappers already follow these guidelines.

I am a supporter of ethical trapping done in a responsible manner.

(feel free to add extra pages of comments)

Printed Name (First and last)*: Irving R. Carlisle

Organization (if any)

Signature*: Irving R. Carlisle

Email*:

Street Address:

City*: Saldanha

State*: AK

Zip code: 99669

*Indicates it must be filled in to be accepted.



To: Alaska Board of Game

From: Kathleen Carlsen/Kodiak

Re: Proposal to Extend Bear Hunting Seasons

As a life-long Kodiak resident and the daughter of one of Alaska's first Master Guides, Bill Poland, I'd like to provide a bit of history:

We are told people are not taking care of their garbage.

When I was growing up in the 50's and 60's, every house had at least one garbage can, not a one was "bear proof", that blew away during big winds. Garbage would be scattered throughout, and usually the kids were tasked with retrieving the missing cans and lids. People were most likely a bit less environmentally conscious at that time. However, no bears.

We are told it's the dump.

I grew up on what is now Rezanof Drive, a block out of town from what is now Kodiak Middle School. About 100 yards from our home and across the street was a Clark's Lake, which the city, while my father was City Manager, turned into a "sanitary landfill" aka dump. However, no bears.

Older residents, including those who grew up in the 20's and 30's, they confirm that bears were unheard of in the Kodiak residential area. The closest bears got to town was the ranches many miles out the road towards Pasagshak. Even siting a deer in town was rare. But bears, absolutely not an issue.



K. Carlsen, page 2

So, what's changed? The city has gotten bigger, yes. But the bears have gotten much bolder. It is unthinkable that 50 years ago, this number of bears would be allowed to endanger peoples lives and property. If the authorities did not dispatch the bears, the men of this town would. I don't know if there are more bears, but they certainly are in areas that they have not been for at least a hundred years.

I've always been able to walk and hike around Kodiak without any thought of bears. Pillar Mountain, Abercrombie, Spruce Cape, Near Island, the bike trail...the worry was about coming across a sketchy person, not bears. The past 10 years, however, all has changed. With so many bears running loose, my world has shrunk. Even the bike trail has been known to have bears! Even downtown! After a long cold winter, hiking has been a mainstay for women and children to get regular exercise. This situation is adversely affecting our health. It is wrong, it is dangerous, and it is untenable.

The bears already have 95% of the island to roam in, they need to be kept out of the Kodiak residential area including our Pillar, Abercrombie, Spruce Cape, and Near Island. Kodiak Bears and people cannot live in the same area. We've had a dog torn to shreds a few blocks from my home as well as a long time hiker of Pillar Mountain trails attacked by a bear. It's just a matter of time until a child is killed.

Therefore, I'm in favor of extending the bear hunting season on the road system.



PC046

Submitted by: Clint Carlson

Organization Name:

Community of Residence: Ninilchick AK

Comment:

I Clint Carlson SUPPORT Proposal #162 I am a full time resident here in the region 15C.

My wife and I are living remote in the Caribou Hills and the Ptarmigan are a great source of protein.

The extension of the season will allow us to hunt later in the winter. The early part of the season presents lots of marshy areas which makes it difficult to traverse.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 162: Support



PC047

Submitted by: Heath Carroll

Organization Name:

Community of Residence: Cooper Landing

Comment:

I support these proposals for trapping in the cooper landing area

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



Submitted by: Kathryn Carssow

Organization Name:

Community of Residence: Homer, Alaska

Comment:

I am writing in support of nine proposals now before the Board of Game at its March 17, 2023, meeting: 145, 146, 147, 149, 150, 151, 152, 153 and 154. I am the former owner and operator of the Russian River Ferry in Cooper Landing. I am a 46-year Alaska resident, 38 of those years spent in Southcentral, including Anchorage and Homer. I have hiked and skied extensively throughout the Kenai Peninsula and drive the Sterling Highway regularly throughout the year.

I ask the BOG to give serious consideration to the ever-growing conflicts between consumptive and other winter outdoor recreation and to take action to reasonably protect the enjoyment of all users of our trails and in wild areas on the Kenai Peninsula. Trapping is an historic and appreciated use of our public lands. It only comes into negative light when others pursuing other forms of winter recreation unintentionally come upon traps. 100-yard setbacks on mapped trails on public lands minimizes conflicts that happen when people or their pet dogs are unintentionally injured in traps. By minimizing these conflicts, trapping will continue to be an appreciated and supported sport. This is why Homer area trappers and outdoor recreationalists have agreed to these reasonable provisions in the Homer and Cooper Landing areas. Winter trails and public lands can be enjoyed by all with setbacks from high use and mapped trails and beaches. Signs indicating where active trapping is taking place protects everyone.

Further, with the millions begin spent on wildlife crossings that protect motorists as well as multiple wildlife, it only makes sense to create hunting and trapping buffers that encourage, rather than kill, harm or discourage wildlife from using them.

Thank you in advance for taking action to put in place these reasonable and locally supported measures.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

I am writing in support of nine proposals now before the Board of Game at its March 17, 2023, meeting: 145, 146, 147, 149, 150, 151, 152, 153 and 154. I am the former owner and operator of the Russian River Ferry in Cooper Landing. I am a 46-year Alaska resident, 38 of those years spent in Southcentral, including Anchorage and Homer. I have hiked and skied extensively throughout the Kenai Peninsula and drive the Sterling Highway regularly throughout the year.

I ask the BOG to give serious consideration to the ever-growing conflicts between consumptive and other winter outdoor recreation and to take action to reasonably protect the enjoyment of all users of our trails and in wild areas on the Kenai Peninsula. Trapping is an historic and appreciated use of our public lands. It only comes into negative light when others pursuing other forms of winter recreation unintentionally come upon traps. 100-yard setbacks on mapped trails on public lands minimizes conflicts that happen when people or their pet dogs are unintentionally injured in traps. By minimizing these conflicts, trapping will continue to be an appreciated and supported sport. This is why Homer area trappers and outdoor recreationalists have agreed to these reasonable provisions in the Homer and Cooper Landing areas. Winter trails and public lands can be enjoyed by all with setbacks from high use and mapped trails and beaches. Signs indicating where active trapping is taking place protects everyone.

Further, with the millions begin spent on wildlife crossings that protect motorists as well as multiple wildlife, it only makes sense to create hunting and trapping buffers that encourage, rather than kill, harm or discourage wildlife from using them.

Thank you in advance for taking action to put in place these reasonable and locally supported measures.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC049

Submitted by: Samantha Castle

Organization Name:

Community of Residence: Anchorage, Alaska

Comment:

I support proposal #145 to provide a 1/4 mile buffer from hunting and trapping near wildlife crossing underpasses and overpass on the Sterling Highway. The purpose of the wildlife crossing areas should be to allow animals to cross the highway in a way that is safe for both the animal and for drivers using the Sterling Highway. Allowing hunting and trapping in and around the wildlife crossings would deter animals of all kinds from using the wildlife crossings as their path to move across the highway. This, in turn, would defeat the purpose of implementing these underpasses and overpass. By creating a 1/4 mile buffer zone near these wildlife crossings, I believe that animals will learn over time that they are a safe and convenient pathway in which to get across the highway, incentivizing them to continue using the designated wildlife crossings rather than running across the highway. If animals use the crossings, there will be less roadkill as well as fewer wildlife-vehicle accidents along Sterling Highway. I believe that the wildlife crossings will be infinitely more successful if a 1/4 mile buffer from hunting and trapping is created, benefiting animals and people in the area. Please implement this buffer to help wildlife crossings along the Sterling Highway become a success!

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 146: Support Proposal 147: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 156: Support Proposal 157: Support Proposal 158: Support Proposal 160: Support



PC050

Submitted by: Carson Caudle

Organization Name:

Community of Residence: Marshall, Texas

Comment:

Proposal 204: Oppose

Dear Board of Game Members,

My name is Carson Caudle. I spent this past hunting season working for Alaska River Wild Adventures as a packer in unit 19C. Working for Guide [REDACTED], I learned a lot about the area and about the sheep in the area. Spencer and the rest of his guides are very knowledgeable of this unit and have great respect for the conservation of the game in the unit. While working, I saw many sheep daily. Even though our success rate was down, I saw many rams. Though mature 8-year-old rams were few, we saw a great number of potential rams for the next seasons to come. Speaking with the guides, I learned that harsh winters from past years are one of the main factors that lead to this shortage of mature rams. Though cycles of this nature happen periodically, shutting the unit down could potentially lead to an influx of hunters into other units, which in turn would hurt the populations in those units. [REDACTED] states that as well

in his comment. Spencer has also said that they will be cutting back on sheep hunters for the next season, which I believe is a great idea. From the rams I saw this past season, I know there will be mature rams next season. When it comes to ewes and lambs, I saw a great abundance of them. I just think this past season was the result of those harsh winters 7-8 years ago. I highly recommend you consider the comments of [REDACTED] and the rest of the guides from ARWA as we oppose the shutting down of unit 19C.

Thank you for your consideration,

Carson Caudle

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 204: Oppose Proposal 205: Oppose



Proposal 204: Oppose

Dear Board of Game Members,

My name is Carson Caudle. I spent this past hunting season working for Alaska River Wild Adventures as a packer in unit 19C. Working for Guide [REDACTED], I learned a lot about the area and about the sheep in the area. [REDACTED] and the rest of his guides are very knowledgeable of this unit and have great respect for the conservation of the game in the unit. While working, I saw many sheep daily. Even though our success rate was down, I saw many rams. Though mature 8-year-old rams were few, we saw a great number of potential rams for the next seasons to come. Speaking with the guides, I learned that harsh winters from past years are one of the main factors that lead to this shortage of mature rams. Though cycles of this nature happen periodically, shutting the unit down could potentially lead to an influx of hunters into other units, which in turn would hurt the populations in those units. [REDACTED] states that as well in his comment. [REDACTED] has also said that they will be cutting back on sheep hunters for the next season, which I believe is a great idea. From the rams I saw this past season, I know there will be mature rams next season. When it comes to ewes and lambs, I saw a great abundance of them. I just think this past season was the result of those harsh winters 7-8 years ago. I highly recommend you consider the comments of [REDACTED] and the rest of the guides from ARWA as we oppose the shutting down of unit 19C.

Thank you for your consideration,

Carson Caudle