

Submitted by: Ann Ghicadus

**Organization Name:** 

Community of Residence: Seward Alaska

## **Comment:**

I support proposals 145 through 154. The intention is to make popular trails and campgrounds and other well used areas safer for families with dogs and kids. Seems like a no brainer to me. Its past time to reduce the terror of watching a family member die a horrible death.

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: Lucas Giesey

**Organization Name:** 

Community of Residence: Juneau, AK

### **Comment:**

Strongly oppose Proposal 83. Sheep units in the state are closing because there are "too few sheep", so why would you open one up to more rifle hunting.

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Proposal 66: SupportProposal 71: Support Proposal 72: Support Proposal 83: Oppose Proposal 84: SupportProposal 85: SupportProposal 87: SupportProposal 91: Support Proposal 92: Support Proposal 93: SupportProposal 94: Support Proposal 95: Support Proposal 96: Support Proposal 97: Support Proposal 99: SupportProposal 97: Support Proposal 99: SupportProposal 100: Support Proposal 101: SupportProposal 110: Support Proposal 111: Support Proposal 112: SupportProposal 113: Support Proposal 114: SupportProposal 119: Support Proposal 120: Support Proposal 121: SupportProposal 122: Support Proposal 123: Support Proposal 124: Support Proposal 125: Support Proposal 126: Support



Submitted by: Darin Gilman

**Organization Name:** 

Community of Residence: Cordova, Alaska

## **Comment:**

Proposal 59- I am against this proposal. Making it an archery only hunt takes away opportunity for local residents that would like to harvest a goat. This area is the most easily accessible, by making it an archery only hunt you limit elderly or younger hunters from participating in goat hunts in the area.

Proposal 63- I support this proposal, it would allow hunters to shoot problem brown bears while they are hunting for deer in unit 6 on Hawkins and Hinchinbrook Islands. It is common to run into brown bears during the first two weeks of October especially during odd years when the pink salmon runs are stronger. This would allow retention of bears in defense of life and property if there was an altercation while deer hunting. The bag limit would not change and would have a minimal impact on sustained yield.

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Proposal 59: Oppose Proposal 60: Oppose Proposal 61: Oppose Proposal 63: Support

## Cooper Landing Trap Setback Proposals, Comments & Ballot

💮 PC 104

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.

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**# 145 Wildlife Crossings:** 1/4 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:

T**#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.

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(feel free to add extra pages of comments)

0 98l Printed Name (First and last)\* Organization (if any Signature\*: Email\*: Street Address \_Zip code:\_\_ \_State\*:\_ Cit

\*Indicates it must be filled in to be accepted.

## Cooper Landing Trap Setback Proposals, Comments & Ballot

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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.
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- #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.
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- #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.

PC 105

omments:	
(feel free to add extra pages of comments)	
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Printed Name (First and last)*:	GOSSITTEN
Organization (if any)	
Signature*:	
Email*:	
Street Address:	44610
city*: Cooper LNDG State*: At	Zip code:

\*Indicates it must be filled in to be accepted.



### Submitted by: Michael Gould

**Organization Name:** 

## Community of Residence: Cooper Landing, AK

## **Comment:**

I live in Cooper Landing, hike and bike the trails in summer and winter, and support the following proposals to reduce the incidence of people, and especially pets, having accidental encounters with traps:

145 - 1/4 mile hunting and trapping buffers from mouths of new highway wildlife crossing on the upcoming Cooper Landing bypass. If the crossings are successful they will funnel and concentrate wildlife to the crossings. Hunting and trapping here would be unethical and unsportsmanlike.

149 - 100 yard trapping setbacks from Cooper Landing area campgrounds. This would include Tern Lake, Quartz Creek, Crescent Creek, Cooper Creek and Russian River Forest Service campgrounds. Visitors with children and pets use these campgrounds extensively and need to be able to do so safely. In winter the roads in some of the campgrounds are groomed for cross country skiing and people take their dogs.

150 -100 yard setbacks from highway pullouts in Cooper Landing. The pullouts along Quartz Creek and the Kenai River are used by trout and silver salmon fishermen even in winter. Fishermen often take dogs out with them.

151 - 100 yard setbacks from recreational areas in the Summit Lake Recreational Area. This area sees considerable winter use by cross country skiers who are often accompanied by dogs.

152 - 100 yard setbacks from some high-use Cooper Landing Trails. These trails are used by hikers and skiers with dogs in winter.

153 - 100 yard setbacks from some Kenai Lake beaches. People walk some beaches more in winter than summer, as the lower water level makes them accessible, and take their dogs with them.

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## Other areas setback proposals:

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

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Although I am in favour of the Proposals for Trapping Set Back Rules for Cooper Landing, Moose Pass and Homer, I am not so naïve as to believe that the Alaska Board of Game will give these Proposals much consideration.

I would like to draw your attention to the opinion letter below that was published in the Anchorage Daily News. As long as there are obstructions to discussion and communications *Before* trapping rules proposals are submitted to the AK BOG, there can be little progress. Discussions and compromises need to be dealt with prior to a proposal's submission.

It would appear that in the long run Trappers could eventually lose more trapping privileges as Alaska Communities become more solid in their opposition to "free-range" trapping in their areas. If proposals are considered too extravagant by the BOG and the ATA, then these entities need to confer with local community committees.

The BOG and ATA should consider that as time progresses local communities may, simply by the force of numbers and changing attitudes, be able to impose their Community Rights on an equal standing as Trapping Rights, which today seem to trump other rights. This could result in more losses for trappers than if they are more willing to deal with changes and offer concessions in the present.

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It would be a great step forward if the BOG recognizes the need and the advantages of compromise on trapping issues.

Thank You,

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Ken Green.

Opinion Letter – Anchorage Daily News – Thursday – 2 Feb 2023

## TRAPPING CONUNDRUM

The problem with trapping questions is that some people like trapping; others do not. The mindsets of these opposing sides have little flexibility. Some people are trappers, others simply are not. But this is not the issue.

The issue that needs concern is an interpretation of safe trapping practices and boundaries, and defining if and what rules should or could be instated or updated. Trappers mostly claim without question that it's their "right" to trap wherever they choose — others support trapping nowhere. Finding common ground between the two extremes is the challenge.

Presentiv, pro-trappers are in key positions of influence and little to no progress is boing made concerning compromises. Trappers claim trappers' rights loudly and exertiv, backed by people in powerful positions and with strong financial support.

"Public safety," often used as a reason to limit trap setting, is a term easily vilified as "overreach" by trapping associations, fish and game boards, and government agencies.

Public safety is not the issue.

Community rights are the issue. It is time for Alaska communities where residents feel threatened by trapping concerns to demand their community rights — not for public safety, but because communities have rights. It is time to believe in and stand up for Alaska's community rights.

---- Ken Green Cooper Landing



#### Submitted by: Mary Griffith

**Organization Name:** 

## Community of Residence: Seward, Alaska

### **Comment:**

I am writing to support proposals 145-147 and149-154 to create 100 yard setbacks around certain designated multi-use trails, and to require trappers to post signs advising that trapping is occurring in the area. In Alaska, there are far more people recreating in winter on public lands than there are trappers, especially along the road system. The management of our public lands ought to change to keep up with changing use. I am a skier and hiker, and enjoy recreating on groomed and multi-use winter trails. I don't appreciate that current trapping regulations allow trapping as close as six feet for such trails. Often the argument is that such traps are 'legal not ethical' and that ethical trappers would not place traps in such busy areas where dogs and potentially young children could encounter them. As the aunt of a 5-year old with developmental disabilities, I worry about this. If ethical trappers would not place traps in such heavy-use locations, I don't understand why the Board of Game would have an issue with such setbacks . I ask the Board of Game to listen to local concerns that have been repeatedly brought to the board, and require setbacks around multi-use winter trails.

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Submitted by: Carol Griswold

**Organization Name:** 

Community of Residence: Seward, Alaska

## **Comment:**

Dear ADFG Board of Game,

Proposals 164, 165, 166, 167, 168, 169, 170, 171, 172

I support the reduction of bag limit for goldeneye, bufflehead, long-tailed ducks, and harlequin ducks in Units 7, 15, and 15C.

I support accurate reporting of sea duck harvest in Units 6, 7, 15, and 15C.

As a wildlife photographer and birder, I have noticed tremendous declines in sea duck numbers including common goldeneyes, Barrow's goldeneyes, bufflehead, long-tailed ducks, harlequin ducks, black scoters and surf scoters. Data from the annual Audubon Christmas Bird Count in Homer and Seward, confirms this alarming decline. There used to be rafts of these species overwintering in Resurrection Bay, now they are represented by a fraction of those numbers.

As stated by the Homer Fish and Game Advisory Board, it would be prudent to address conservation concerns conservatively and reduce the bag limits on the above species.

Sincerely,

Carol Griswold

Seward, Alaska

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Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support Proposal 168: Support Proposal 169: Support Proposal 170: Support Proposal 171: Support Proposal 172: Support

## Dear ADFG Board of Game,

D. Methods and means or taking big, game, fur animals, and furbearers...including requirements for trap identification, signage, breakaway mechanisms, minimum size for jaw spread, and restrictions on trapping near trails, trailheads, roads, and dwellings.

G. Restricted Areas, including Areas closed to hunting and trapping, including proposed areas near roads, trails, beaches, structures, and campgrounds including the Lower Kenai Controlled Use Area, management areas including

Proposals 146, 147, 148, 149, 150, 151, 152, 153, 154

I support establishing regulations to help mitigate conflicts between trappers and other recreational users on the Kenai Peninsula. Require trap identification, signage warning of active trapping in area, breakaway mechanisms, minimum size for jaw spread, and restrictions on trapping along highly used public trails, public beaches, campgrounds, certain snowmachine and Nordic ski trails, multi-use trails, along highway pullouts, backcountry access points, trailheads, winter trails, and other developed recreational facilities and dwellings.

Actively encouraging "ethical and safe trapping practices" and encouraging trappers "to be cognizant of potential conflicts and to follow the trapper's Code of Ethics" is not working.

Use of these public trails, beaches, campgrounds, and other developed facilities has greatly increased since the historic days of the solitary trapper. Outdoor recreational opportunities have expanded to include fat bikes, skiers, hikers, photographers, wildlife watchers, ice skaters, ice climbers, and snowmachiners. Many of these users have kids and dogs. It's past time to recognize the need for setbacks and regulations at these popular areas and establish basic regulations that are fair to both the trappers and recreational users.

Thank you,

Carol Griswold

Seward, Alaska

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Carol Griswold

Seward, Alaska

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Dear ADFG Board of Game,

I support Proposal 104: Close Chugach State Park and Glacier Creek drainage in Unit 14 to lynx hunting and trapping.

The loss of lynx hunting and trapping opportunities in Chugach State Park and Glacier Creek drainage in Unit 14C will not have a significant effect; access is difficult, the harvest is small, and there is no financial impact to adopt this proposal. Conversely, the popularity of Chugach State Park and Glacier Creek drainage for winter recreation has exploded with winter fatbikers, backcountry skiers, hikers, mountain climbers, icefall climbers, wildlife photographers, birders, and snowmachiners, including kids and dogs.

Not having to worry about losing a pet (or kid) to a trap or being shot, far outweighs the small benefit for a small number of trappers or hunters.

The economic benefits of recreational tourism are far greater than that for trappers or hunters.

I appreciate your support of Proposal 104.

Sincerely,

Carol Griswold

Seward, Alaska

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Proposal 104: Support



#### Submitted by: Richard Gustafson

**Organization Name:** 

## Community of Residence: Homer, Alaska

### **Comment:**

I have been an Alaska resident since 1971 and lived on the southern Kenai Peninsula since 1982. During that time period I have seen many changes to wildlife populations and land use by Alaska residents and nonresidents. This growth has led to conflicts between user groups.

I support the following proposals to help reduce conflicts between user groups.

#145- The 1/4 mile set back buffer for both hunting and trapping make sense for the wildlife underpass and overpass crossings in the new Cooper Landing bypass. These underpasses and overpasses benefit wildlife by reducing the possibility of crashes of cars and trucks and the travelers on the highway. The down side is that wild life are funneled into these small areas thus benefiting hunters and trappers. To me it is important to have set back buffers for those areas. Not having buffers would be like shooting fish in a barrel or the same as hunting the same day airborne. The reduced opportunity argument is weak. Far more area is taken up by the new highway than the 1/4 mile set backs in the proposal and the proposed set backs are small when compared to the total area of the hunting unit.

#146, #147, #148, 149, #150, #151,#152, #153. The set backs make sense on all the trails and campgrounds in these proposals. Over the 41 years that I have lived in the area there has been a great increase in use of these trails by hikers, snowshoers, skiers, bikers and the camping public. There has also been an increase of new residences and cabins. This increase in population and use has resulted in conflicts between trappers and other users and residents. Thus to reduce user group conflicts setbacks are needed on these trails, campgrounds and recreation areas. No one wants to see pets caught in traps.

#154 Also, it makes since for trappers to inform the public who use the trails and campgrounds that they are trapping in an area.

I am opposed to proposal #162. I cross country ski at Lookout Mountain regularly. Finally in 2021 and 2022 I started seeing a few small flocks of ptarmigan. So far in 2023 I have not seen any. Now is not the time to call the populations of rock and willow ptarmigan recovered. The Department needs more data other than harvest data to declare the population recovered and liberalize the season.

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Submitted by: Penelope Haas

**Organization Name:** 

Community of Residence: Homer, AK

#### **Comment:**

See attached for reasons.

Proposal 145: Close areas to hunting and trapping within 1/4 mile of parts of the Sterling Highway in Units 7 and 15. SUPPORT.

Proposal 146: 100 yd. setbacks for traps from 3 popular winter trails in Kachemak Bay State Park. SUPPORT.

Proposal 147: 100 yd. setbacks for traps from mapped KNSC ski & mapped multi-use Snomads trails in Homer area. SUPPORT.

Proposal 156: Close beaver trapping in the Anchor River and Deep Creek Drainages in Unit 15C for six years with a required review before re-opening. SUPPORT.

Proposal 160: Limit beaver trapping to one set per lodge and only one beaver may be removed per lodge in Units 7 and 15. All lodges that have been or are being trapped in the current season must be visually marked with a pole set vertically in the ice. SUPPORT.

Proposal 162: Extend the ptarmigan season in a portion of Unit 15C to August 10th - March 31st. OPPOSE.

Proposal 163: proposal to roll back existing protections for Sea Ducks in Kachemak Bay: OPPOSE.

Proposals 164-170: proposals regarding reduction of bag limits for Goldeneye, Bufflehead, Harlequin & 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

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Friday, March 3, 2023

Dear Members of the Board of Game:

I have been an Alaska resident for 16 years. I am an avid hunter, sport and commercial fishermen. I run my own business and built my own off-grid home. I have spent years talking with all kins of people about some of the proposals before you. I hope you will consider my comments as you deliberate on these important issues that will have such a large impact on hunters, trappers, and residents of the Kenai Peninsula.

Thank you for your consideration,

Penelope Haas

**Proposal 145:** Close areas to hunting and trapping within 1/4 mile of parts of the Sterling Highway in Units 7 and 15. **SUPPORT.** 

**Proposal 146:** 100 yd. setbacks for traps from 3 popular winter trails in Kachemak Bay State Park. **SUPPORT.** 

**Proposal 147:** 100 yd. setbacks for traps from mapped KNSC ski & mapped multi-use Snomads trails in Homer area. **SUPPORT.** 

**Proposal 156:** Close beaver trapping in the Anchor River and Deep Creek Drainages in Unit 15C for six years with a required review before re-opening. **SUPPORT.** 

**Proposal 160:** Limit beaver trapping to one set per lodge and only one beaver may be removed per lodge in Units 7 and 15. All lodges that have been or are being trapped in the current season must be visually marked with a pole set vertically in the ice. **SUPPORT.** 

**Proposal 162:** Extend the ptarmigan season in a portion of Unit 15C to August 10th - March 31st. **OPPOSE.** 

**Proposal 163:** proposal to roll back existing protections for Sea Ducks in Kachemak Bay: **OPPOSE.** 

**Proposals 164-170**: proposals regarding reduction of bag limits for Goldeneye, Bufflehead, Harlequin & 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.** 

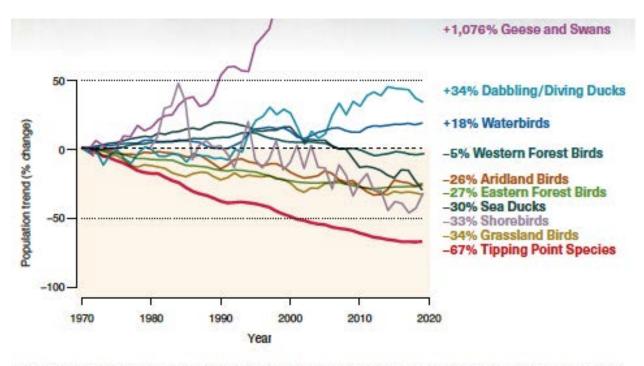
## OPPOSE Proposal 163. Rescind the bag limit restrictions for sea duck hunting in Unit 15C.

- This proposal would change the bag limit restrictions put in place in 2010 to protect vulnerable populations of sea ducks. They want to change the current regulation that says "2 per day, 4 in possession of harlequin or long-tailed ducks, and no more than 1 per day, 2 in possession of eiders (king or common). In addition, nonresidents may not take or possess more than 4 each of any scoter or merganser species."
- This proposal not supported by the Homer Fish and Game Advisory Committee. It is not supported by local sea duck hunters or commercial guides, because it is not necessary or prudent to increase harvest on these populations.
- Anecdotal evidence from long-time local residents and statistics from the The U.S. Committee of the North American Bird Conservation Initiative <u>"State of the Birds" 2022</u> <u>report</u> (which shows a national decline in sea duck populations of 30% from 1970 to 2022) indicates that there has been a significant decline in sea duck populations in K-Bay. We should be working to recover these populations, and bag restrictions are one of our only tools.
- Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is "to protect and preserve habitat" and the Kachemak Bay Management Plan says that "priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations."
- Hunters here are happy with the status quo. There is no need for change.

## SUPPORT Proposals 164-170. Proposals regarding reduction of bag limits for Goldeneye, Bufflehead, Harlequin & Longtailed Duck.

- A bag limit reduction on bufflehead, goldeneye, and harlequin is needed to ensure hunt opportunities now and in the future.
- These limits will not hurt the businesses of hunting guides operating in the bay. They will not hurt the ability of folks to harvest food.
- Anecdotal evidence from long-time residents and statistics from the The U.S. Committee of the North American Bird Conservation Initiative <u>"State of the Birds" 2022</u> <u>report</u> (which shows a national decline in sea duck populations of 30% from 1970 to 2022) indicates that there was a significant decline in sea duck populations in K-Bay in the 1990s. We should be working to try to recover populations.
- Populations of sea ducks are slow to recover from over-harvest, unlike other "small game," because of they have high site-fidelity (they come back to the same place





Trends for breeding bird species by group or by habitat during 1970-2019, except for the shorebirds trend, which begins in 1980. For details, see pages 6-13.

every year), they don't reproduce until they are 2-3 years old, and they generally only lay one clutch per year.

 Harvest can jump significantly in K-Bay, with the addition of more guides and people, as we saw clearly in the winter of 2021. ADF&G does not have the ability to limit the number of guides operating in K-Bay, and the addition of even one more guide to can do real damage to populations (one boat, five clients, each client harvesting 8 a day, under current regs., 24 birds in 3 days x 5 = 120).

• Limiting harvest is one of our only mechanisms for protecting populations and supporting their recovery.

- Goldeneye and Bufflehead live in inside waters and so are particularly prone to overharvest.
- While ADF&G managers argue that Pacific Flyway counts are the best way to manage K-Bay sea ducks, we believe local management is useful and necessary because:
  - Sea duck populations have exceedingly high levels of site fidelity--they come back to the same place every year.
  - Many of Alaska's sea ducks do not go down to the Lower 48 to nest, where Pacific Flyway surveys are conducted. Instead, many of our birds go up to Alaska's northern boreal forests and deltas to lay their eggs. The Pacific Flyway surveys are not even counting them!
  - Kachemak Bay is arguably the easiest place to access sea ducks in all of Alaska.
  - "Kachemak Bay is the most important marine bird habitat in lower Cook Inlet (Erikson 1977) and there are no comparable areas in upper Cook Inlet. During winter months over 90% of the marine birds in lower Cook Inlet are found in



Kachemak Bay (Erikson 1977). Few birds inhabit the offshore waters of lower Cook Inlet in winter, and the extensive inshore ice in the upper inlet and along the western shore is avoided by most marine birds..." ("Kachemak Bay and Fox River Flats Critical Habitat Area Management Plan").

- Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is "to protect and preserve habitat" and the Kachemak Bay Management Plan says that "priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations."
- We do not have reliable local or national data on populations or harvest of sea ducks, so we should act conservatively.

## SUPPORT Proposal 171. Direct the Department of Fish and Game to institute means and methods to record sea duck harvest as accurately as possible in Units 6, 7 and 15.

- We should keep tabs on harvest, so that we can know if there is a spike and respond to protect populations. It's like a flag that goes up.
- Regulatory language could be modeled on similar regulations in the State of Washington, which has a mandatory online hunt report system: <u>fishhunt.dfw.wa.gov</u>
- Harvest can jump significantly in K-Bay with the addition of even one more guide, (one boat, five clients, each client harvesting 8 a day, under current regs., 24 birds in 3 days x 5 = 120). But F&G does not have the ability to limit the number of guides working in K-Bay.
- Using harvest data to manage populations is common and common-sense. For example, black bear populations are managed though harvest data alone (since the buggers are hard to count from the air).
- The existing reporting system, HIP, does not give managers nearly enough information. It invites voluntary reporting from a very small, randomized group of hunters from all across the state. ADF&G staff have acknowledged that HIP doesn't give us enough information to make decisions.
- Local hunting guides are in favor of this proposal, because they keep track of harvest anyway, and because it may even dispel some of the concerns of over-harvest.
- ADF&G has said that they do not manage sea ducks based on local populations or harvest because they are migratory waterfowl. They would rather use data from the <u>Pacific Flyway</u> and extrapolate from these counts. Sea ducks, however, have a very high degree of site fidelity; many of our local species are not even included in the Pacific Flyway counts; many of our populations never even go to the lower 48, where most of the flyway data comes from, and many are nesting in boreal tree cavities when surveys are done (pretty hard to see a duck in a tree).
- Anecdotal evidence from long-time residents and statistics from the The U.S. Committee of the North American Bird Conservation Initiative <u>"State of the Birds" 2022</u> <u>report</u> (which shows a national decline in sea duck populations of 30% from 1970 to



2022) indicates that there was a significant decline in sea duck populations in K-Bay in the 1990s. We should be working to try to recover populations. We should monitor harvest within K-Bay because populations will not recover from consecutive years of over-harvest—high site-fidelity and low reproduction rate.

- It is ideal to pair harvest data with population trends. Homer residents would like to work with ADF&G to pair harvest data with our K-Bay citizen science population surveys to improve harvest management in our Critical Habitat Area and State Park waters. 2023 was our 3rd Annual Sea Duck Survey, with 10 boats and almost 40 participants, the accuracy of our data is evident in the fact that we always double count an area with two different boats and get very similar survey results.
- While ADF&G managers argue that Pacific Flyway counts are the best way to manage K-Bay sea ducks, we believe local management is useful and necessary because:
  - Sea duck populations have exceedingly high levels of site fidelity--they come back to the same place every year.
  - Many of Alaska's sea ducks do not go down to the Lower 48 to nest, where Pacific Flyway surveys are conducted. Instead, many of our birds go up to Alaska's northern boreal forests and deltas to lay their eggs. The Pacific Flyway surveys are not even counting them!
  - Kachemak Bay is arguably the easiest place to access sea ducks in all of Alaska.
  - "Kachemak Bay is the most important marine bird habitat in lower Cook Inlet (Erikson 1977) and there are no comparable areas in upper Cook Inlet. During winter months over 90% of the marine birds in lower Cook Inlet are found in Kachemak Bay (Erikson 1977). Few birds inhabit the offshore waters of lower Cook Inlet in winter, and the extensive inshore ice in the upper inlet and along the western shore is avoided by most marine birds..." ("Kachemak Bay and Fox River Flats Critical Habitat Area Management Plan").
  - Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is "to protect and preserve habitat" and the Kachemak Bay Management Plan says that "priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations."
  - We do not have reliable local or national data on populations or harvest of sea ducks, so we should act conservatively.

## SUPPORT Proposal 156. Close beaver trapping in the Anchor River and Deep Creek Drainages in Unit 15C for six years with a required review before re-opening.

• The Anchor River beaver population is about gone as far as research shows. It needs some time to recover.

• According to ADF&G, historically the Anchor River drainage has supported a significant harvest of beavers. In 1976, almost half (64 of 136) of the beavers taken in Unit 15 came from the Anchor River drainage system. The last documented harvest of



beavers in this unit was 1 beaver in 2011; prior to this, a beaver had not been harvested since 2006 when 4 beaver were taken, despite active trappers in the area.

• Beaver harvest across Unit 15C has declined significantly in recent years, from an average of 22 beavers per year (2012-2016) to 5 in 2017. Trappers reported to local staff low numbers and poor recruitment along traditional trap lines in 2017.

• ADF&G does not conduct surveys for beavers on a regular basis on the Kenai Peninsula. In 2018, a beaver survey was flown covering the Anchor River and surrounding drainages. One active site was found within the Anchor River drainage. Surrounding drainages held multiple active sites.

• It is in the public interest to rehabilitate beaver populations on the Kenai Peninsula for the following reasons:

- Beavers make critical habitat for <u>baby salmon and trout</u>.
- The habitat beavers create is good for moose populations.
- Beavers improve <u>water quality</u> and <u>mitigate flooding</u> (and associated erosion and landslides) and everyone wins!
- They store water during drought remember 2019? Summers on the Kenai are on a warming and drying trend. The water that beavers store and habitat that beavers create are essential for humans, healthy salmon and trout populations, and help mitigate the risk of large-scale wildfire.

## SUPPORT Proposal 160: Limit beaver trapping to one set per lodge and only one beaver may be removed per lodge in Units 7 and 15. All lodges that have been or are being trapped in the current season must be visually marked with a pole set vertically in the ice.

- Trapping appears to be a major factor in the extirpation of beavers in many areas of the Kenai Peninsula.
- Trapping records in Units 7 and 15 show that beaver populations have declined significantly from historic times (1950-1970) to now is significant.
- This is a carefully crafted proposal to allow for beaver trapping to continue (as many members of the Board of Game want to see) but to try to make sure that we do not continue to over-harvest. It has been tested in the Kenai National Wildlife Refuge to good effect.
- Multiple trappers in one area can contribute to over-harvest of beaver lodges.
- The low numbers of beavers around the road system is a strong indicator that access (trappers using the roads) is driving down beaver populations.
- It is in the public interest to rehabilitate beaver populations on the Kenai Peninsula for the following reasons:
  - Beavers make critical habitat for <u>baby salmon and trout</u>.
  - The habitat beavers create is good for moose populations.



- Beavers improve <u>water quality</u> and <u>mitigate flooding</u> (and associated erosion and landslides) and everyone wins!
- They store water during drought remember 2019? Summers on the Kenai are on a warming and drying trend. The water that beavers store and habitat that beavers create are essential for humans, healthy salmon

and trout populations, and help mitigate the risk of large-scale wildfire.

## OPPOSE Proposal 162. Extend the ptarmigan season in a portion of Unit 15C to March 31.

- We shortened the season for a good reason in 2014-2015 for a good reason, and there is not a good reason to revert back to a long season.
- The harvest that is advocated in this proposal is what is known as "additive"—that means that when you harvest a ptarmigan in the fall, you don't have such a big impact on the population, since the winter is the biggest killer, but if you harvest in the spring, you are taking the birds from the population that survived the winter, the ones that should reproduce, and you have a way bigger impact on the population health.
- The impetus for a shorter season came when the late Bruce Willard submitted a
  proposal to the BOG for their 2014-2015 meeting cycle to shorten the ptarmigan
  hunting season in a portion of 15C because of a "significant decline in ptarmigan
  numbers has occurred in Unit 15C north of Kachemak Bay". The ADF&G 2014
  ptarmigan breeding survey validated that very low breeding densities in this area was
  a long-term trend, not just a one year event.
- Springtime is way too easy to hunt ptarmigan in 15C—snow machines with plenty of snow, warmer temperatures and more light can cover enormous distances and really cut down the ptarmigan population. That's what happened in the early 2000s when the reduced season was instituted, and that is what will happen again if we go back to the way things were.
- After several years of no spring ptarmigan hunt, it appears as if the ptarmigan population in the hills above Homer is increasing. The plan is working. But the message to the BOG should be don't fix what isn't broken. Keeping the status quo should result in greater abundance of ptarmigan in this area, to the benefit of both hunters and bird watchers. Going back to allowing a spring hunt could quickly revert to low populations of ptarmigan and limited opportunity for outdoors people to enjoy our state bird.
- Bag limits have little effect as most hunters take an average of 3 birds/trip. So it is the number of hunters, timing of season, and access that really drives effects from hunting.
- The shorter season we have now allows for a healthy fall/early winter hunt. If ptarmigan populations are healthy, those hunts will be good. And that's how it should work



# SUPPORT Proposal 145. Close areas to hunting and trapping within 1/4 mile of parts of the Sterling Highway in Units 7 and 15.

• The highway construction plans include multiple wildlife underpasses and Alaska's first wildlife overpass. Fencing is meant to keep wildlife off the road and funnel them through crossings, but current regulations allow for hunting and trapping on these crossings. Make these multi-million dollar crossings safe passages for wildlife.

• Without a change in regulation, hunting and trapping would be permitted on and at the entrance/exit of multi-million dollar structures meant to create safe passage across the highway; underpasses and bypasses that are meant to benefit wildlife, could turn into a population sink.

• Ensure that the \$10+ million investment of public funds to help wildlife navigate an increasingly congested part of the Kenai Peninsula is honored by State hunting and trapping regulations.

## SUPPORT Proposal 146-147: 100 yd. setbacks for traps from 3 popular winter trails in the Homer area.

- Local trappers and other trail users worked together to develop these proposals and they simply put into the rules what ethical trappers are already doing.
- This is not a burdensome setback, particularly when most trappers on the Homer side are on snow machines.

• 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 users, 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.



Submitted by: Kat Haber

**Organization Name:** 

Community of Residence: Homer, AK

## **Comment:**

I support proposals #145, #146, #147 to protect our wildlife from over trapping on the Kenai Peninsula.

- Over passes are proven to dramatically decrease roadkill.
- The further from these high trafficked pathways the better for protecting our wildlife.
- Wildlife is a major draw for why we live in Alaska.
- We are counting on you, Board of Game, to protect our animals for 7 generations to come.

Thank you for your service.

Kat Haber

Past President, Center for Alaskan Coastal Studies

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

## Cooper Landing, AK Trap Setbacks



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.

PC 113 100 Comments: to allow apping while potecting p Wan (feel free to add extra pages of comments) Printed Name (First and last)\*: Haddow AMY Organization (if any) Hah Signature\*: Email\*: Street Address: State\*: <u>AK</u> Zip code: <u>99664</u> ewas City\*

\*indicates it must be filled in to be accepted.



Submitted by: Leslie Hafemeister

**Organization Name:** 

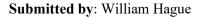
Community of Residence: Fairbanks, Alaska

## **Comment:**

Regarding proposal 146 and 147. The usage of trails and outdoor activities for hikers, skiing, mushing, biking etc... have increased greatly, with a good majority including their animal companions and young kids. Most trappers are using some form of motorized vehicle for accessing traps and have plenty of areas they can use away from the designated set backs. This is an attempt to get along with trappers and seems they would be willing to reciprocate the goodwill. 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: Support Proposal 147: Support



**Organization Name:** 

Community of Residence: Homer

**Comment:** 

The proposal uses Snomads as if the Snomads support the proposal. The writers of the proposal did not contact Snomads and do not have permission to make it appear that Snomads support their position.

Homer Snomads work to maintain access to multiple users. Snomads prefer to not be involved in this proposal.

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 55: Oppose Proposal 56: Oppose





Esther Chiang, Riley Glancy, Nikita Hahn, Hannah Hicks, Linfeng Li, Zhangyanyang Yao

## RE: Proposal 155: 5 AAC 92.550 Areas closed to trapping.(close 15c)

Our team is in support of Proposal 155 to close beaver trapping in Unit 15C as it will provide time for the beaver population to regenerate. Research over the past several decades shows that beaver activities can alleviate environmental stress linked with climate change. This has been observed specifically in regions experiencing rising temperatures and reduction of annual precipitation. An increase in beaver populations in Unit 15C would provide beneficial ecosystem services such as recharging groundwater, increasing biodiversity by creating heterogeneous habitats, reducing stream temperature, and improving carbon sequestration. As the proposal already mentioned, there is an evident decrease in salmon populations throughout Unit 15C. Beaver habitat provides great benefits to salmon populations, allowing them to swim through dams to reach Kachemak Bay and return to respawn in cooler, freshwater habitat provided by beaver dams and ponds.

Closing the 15C area and subsequently allowing the beaver population to thrive would also provide other social benefits such as educational and economic opportunities for the local community.

## RE: Proposal 156: 5 AAC 84.270. Furbearer trapping.

Our team is in support of Proposal 156 as amended "Close beaver trapping in the Anchor River, Deep Creek and Fritz Creek drainages in Unit 15C for six years as follows: Close all beaver trapping in the Anchor River, Deep Creek and Fritz Creek drainages in Unit 15C for two board cycles with a required sunset review."

Beavers were once abundant in these drainages due to the immense suitable habitat mentioned in Proposal 156. During six weeks of field research assessing part of the Fritz Creek upstream drainage, our team discovered evidence of previous beaver activity and confirmed it provides suitable beaver habitat. However, our research indicates beavers have also been extirpated from the Fritz Creek Drainage we assessed; we found **no evidence** of current beaver populations. Removal of beaver can directly lead to negative impacts to both hydrologic and hydraulic function including stream incision, water availability, and stream biodiversity.

Specifically, water availability has been decreasing for many years due to drying trends and reduced precipitation within the Kenai Peninsula. Based on our field work in the Fritz Creek watershed, the current water depth of the stream is low with a typical depth of 1-3 inches. Additionally, our research shows the reaches we assessed of Fritz Creek stream to be deeply incised due to hydrodynamical erosion of low water flow. Closing beaver trapping in the Fritz Creek watershed accompanied by ongoing action of beaver reintroduction will facilitate their settlement, recharge the water level, reduce incision, and overall help restore the stream. The



restoration of beaver in Fritz Creek would also benefit peatland accumulation, helping to reduce carbon and mitigate the impacts of climate change.

## RE: Proposal 160: 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

Our team is in support of Proposal 160 to limit trapping to one beaver set per lodge. It is important to protect beaver colonies due to their strong family relationships. Placing a limit on the amount of trapping that can occur within one lodge will allow for the beaver colony to continue to grow in size. Beaver populations support a healthy ecosystem, so removal of entire colonies would drastically change the environment and landscape. Visual identifiers are essential components of communication to alert that a lodge has met its trapping capacity for the season.



Submitted by: Carol Harding

**Organization Name:** 

Community of Residence: Homer, AK

### **Comment:**

I support Proposition #146 & #147 for 100 yard setbacks on Homer Trails. Times have changed and there are many more people on trails than there were 50 years ago. It is inexcusable for traps to be set so close to trails that they capture & injure dogs!

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

see attached

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: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support Proposal 168: Support Proposal 169: Support Proposal 170: Support Proposal 171: Support Proposal 172: Support



Alaska Board of Game PO Box 115526 Juneau, AK 99811-5526 https://www.adfg.alaska.gov

Re: Sea Duck Proposals 162 through 172

March 2, 2023

To whom it may concern:

I have lived in Homer, Alaska, for almost 30 years, and have watch with alarm the precipitous decline of sea ducks in Kachemak Bay. Birds are a significant part of the Alaska ecosystem. While some species are a human food source, many enrich our lives through their beauty and song. Birds are an important local resource in the Kachemak Bay area that we need to protect.

The Board of Game is about to vote on a series of proposals that might adversely affect the populations of game birds and waterfowl that reside in and around Kachemak Bay. Proposals and our support or opposition are listed below

**Proposal 162:** Lift hunting restrictions on ptarmigan on the Homer Bench: **OPPOSED** The spring hunt for ptarmigan in the hills above Homer was closed due to the heavy harvest of birds mainly by hunters on snowmachines having easy access to small flocks in willow patches. Ptarmigan have slowly started to repopulate the area. However, recovery is far from justifying any harvest. Relaxing restrictions would allow the existing ptarmigan to be easily wiped out again because of the number of hunters and snow machines that are likely to access the area.

**Proposals 164-170**: proposals regarding reduction of bag limits for Goldeneye, Bufflehead, Harlequin & 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** 

**Proposal 163:** proposal to roll back existing protections for Sea Ducks in Kachemak Bay: **OPPOSE.** 

I have taken the above stances for the following reasons:

Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is "to protect and preserve habitat" and the Kachemak Bay Management Plan says that



"priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations" (5 AAC 95.610).

"Kachemak Bay is the most important marine bird habitat in lower Cook Inlet (Erikson 1977) and there are no comparable areas in upper Cook Inlet. During winter months over 90% of the marine birds in lower Cook Inlet are found in Kachemak Bay (Erikson 1977). Few birds inhabit the offshore waters of lower Cook Inlet in winter, and the extensive inshore ice in the upper inlet and along the western shore is avoided by most marine birds..." ("Kachemak Bay and Fox River Flats Critical Habitat Area Management Plan").

Respectively submitted,

Carol Harding

Homer, AK 99603



### Submitted by: Jennifer Harpe

**Organization Name:** 

Community of Residence: Cooper Landing, AK

### **Comment:**

I support set backs for trappers. By all means we should be able to find a compromise in a rapidly changing demographic of users. Trappers use all forms of vehicles to get to their traps so it really shouldn't be the biggest of deal.

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 55: 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 P



Submitted by: Adam Harris

**Organization Name:** 

Community of Residence: Eagle River, AK

**Comment:** 

Re: Prop 204

19C has been an area of interest by many for a while. The writing was on the wall where the sheep populations were headed. Resident hunters deserve priority and non-resident hunters have harvested substantially more sheep in this area. Any limitations in hunting should first and foremost be directed at non-residents. This has been suggested multiple times yet the BOG continues to ignore these requests. Now the time has come to make restrictions on harvests, yet the proposal is to not let anyone hunt sheep in the area. When restrictions are warranted, NON RESIDENTS MUST BE FIRST to be restricted, not at the same time as residents!

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 78: Support Proposal 204: Oppose

To the Alaska Board of Game,



## Proposal 57 - SUPPORT

Proposal 57 is to allow the ethical recovery of fur animals under small game regulations for the Southcentral region. Currently under the trapping regulations statewide, dead fur animals may be retrieved by a dog. This can be found on page 13 of the current trapping regulation booklet (see attached). I have also attached a portion of page one of the current small game regulation booklet to these comments. The recovery of fur game such as fox, lynx, coyote etc, should not be limited to the trapping regulations only but should also be allowed in hunting regulations where fur animals are regulated. There is no downside to the recovery of valuable mortally wounded fur animals after they have been shot. A well trained hunting dog is just as good at tracking, finding and retrieving a wounded fox as it is retrieving a wounded hare or a wounded duck. Why should calling in a fox, shooting it, and sending a dog to recover it, be any different than calling in a duck, shooting it, and sending a dog to recover it, small game or fur animals. It is important to note that this proposal DOES NOT advocate for using a dog to pursue fur animals but only to recover them after they have been shot. I personally have used a dog in multiple states to recover fur animals that I either could not find or could not get to after they had been shot. If I had not had a well trained dog I would have lost a lot of valuable fur.

Thank you for your consideration of this and all other proposals.

Respectfully,

Mike Harris

#### Methods for Trapping

You may use any method to take furbearers with a trapping license unless it is prohibited below. The following methods and means are illegal for taking furbearers;

#### YOU MAY NOT:

- shoot from, on, or across a highway;
- use poisons or a substance that temporarily incapacitates wildlife, except with written permission from the Board of Game or with the use of an Electronic Control Device (ECD) Taser-type device that temporarily incapacitates game, except under a permit issued by the department;
- take a wolf or wolverine with a firearm until after 3:00 a.m. following the day in which you have flown in an airplane; however, you may shoot a wolf or wolverine caught in a trap or snare on the same day you have flown;
- use a helicopter to transport you, your trapping equipment, or any furbearer; however, a helicopter may be used during emergency rescue operations in a life-threatening situation;
- use an aircraft, snowmachine, motor-driven boat, or other motorized vehicle for the purpose of driving, herding, or molesting furbearers;
- take furbearers with the use or aid of a machine gun, set gun, or a shotgun larger than 10 gauge;
- take furbearers with the aid of a pit, fire, light (other than sunlight or moonlight), laser sight (excluding rangefinders), electronically-enhanced night vision, any forward looking infrared device, any device that has been airborne, controlled remotely, or communicates wirelessly, and used to spot or locate game with the use of a camera or video device, any camera or other sensory device that can send messages through wireless communication, artificial salt lick, explosives, expanding gas arrow, bomb, smoke, deer urine, elk urine, chemical (excluding scent lures), or a conventional steel trap with an inside jaw spread over 9 inches. Exceptions: Killer-style (body-grip) trap with a jaw spread of less than 13 inches may be used. Artificial light may be used for the purpose of taking furbearers Nov 1- Mar 31 in Units 7 and 9-26 during an open season;
- use wireless communication to take a specific animal until after 3:00 a.m. following the day after the use of the device;
- disturb or destroy beaver houses or any furbearer den (except that muskrat pushups or feeding houses may be disturbed in the course of trapping);

use a dog (except to retrieve dead furbearers);

- use a hook, net or fish trap (except a blackfish or fyke trap);
- wear foot gear with felt soles or other absorbent fibrous material in freshwater streams;
- take furbearers from a motorized land vehicle you must be off or out of any motorized land vehicle before shooting, see exceptions for taking wolves and wolverines on next page;
- shoot furbearers from a motor-driven boat unless the motor has been shut off and the progress from the motor's power has ceased; see exceptions for taking wolves on next page.

13

#### Fur Animals, Small Game, Unclassified Game, and Deleterious Exotic Wildlife

- If you want to take fisher, marmot, marten, mink, muskrat, river otter, or weasel, you must buy a trapping license and follow trapping regulations.
- . You may take beaver, coyote, fox, lynx, squirrel, wolf, or wolverine under either a hunting license or a
- trapping license, but you must follow the seasons, bag limits, and methods and means permitted by that license. • See page 22 for salvage requirements.
- In Unit 18, lead shot size T (.20" diameter) or smaller is prohibited. Taking game under provisions of either a hunting or trapping license using a shotgun or using loose shot in a muzzleloading firearm is ONLY ALLOWED using nontoxic shot size T (.20" diameter) or smaller, and hunters may not be in immediate possession of lead shot.
- Portions of Units 20, and 24-26 are within the Dalton Highway Corridor Management Area (DHCMA) and additional restrictions apply. See page 105.

#### Fur Animals

- Fur animals MAY NOT be taken under the hunting regulations by the following methods:
- with a dog (except coyote in Unit 20D after registering with ADF&G), trap, snare, net, or fish trap;
   by disturbing or destroying dens;
  - by distaroing or destroying dens;
     the same day you have been airborne, unless you are at least 300 feet from the airplane;
  - with a nonresident small game license.





Submitted by: Emily Heale

**Organization Name:** 

Community of Residence: Kenai, Alaska

**Comment:** 

I support the proposal #145-154 for trap setbacks.

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: Carla Hebert

**Organization Name:** 

Community of Residence: Anchorage, AK

**Comment:** 

Support the Proposed Rule: Hunting and Trapping in National Preserves: Alaska (NOS-2023-0001-0001)

Support Alternative 2 in the Draft Environmental Assessment: Revisiting Sport Hunting and Trapping on National Park System Preserves in Alaska

As an Alaskan, I support the above rules. Bear baiting and hunting during denning/baby seasons are unethical forms of hunting. The proposed rule will not affect legal and ethical hunting. It will also not impact our native communities from essential subsistence activities. Our family wants to be able to enjoy our wild spaces and our wildlife without worry and disgust at these behaviors .

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 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



Submitted by: Alison Lee Hedberg

**Organization Name:** 

Community of Residence: Indian Alaska

#### **Comment:**

I am and have been a resident in Rainbow Valley off and on for 40+ years. Our community's private property stretches one mile East to West from up one hill side to up the other. Our homes are located throughout this area. Several homes have children.

No one from outside the community would know where our private property boundaries are. Hunters would likely trespass attempting to reach the upper elevations above our property and have no idea where the homes are.

PLEASE do not include our valley in your plans to open any hunting, most importantly bear hunting.

Thank-You,

Alison L Hedberg

PO Box 111446

Anchorage AK 99511-1446

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 98: Oppose



Submitted by: Sue Hedge

**Organization Name:** 

Community of Residence: Anchorage, AK

**Comment:** 

Proposal #145. I support this proposal. The safe passage of wildlife depends on the 1/4 mile buffer from hunting and trapping. It only makes sense that the small area is honored by hunters and trappers to give animals a chance to leave the busy Highway 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



Submitted by: Alex Hedman

**Organization Name:** 

Community of Residence: Eagle River, AK

#### **Comment:**

I oppose the following proposal:

82/83 - retain archery-only restriction; one of the few areas with a weapons-specific requirement for sheep hunting.

102 - oppose lengthening brown bear season.

103 - oppose bear baiting in this popular recreational area; potential for increased person-bear interaction as bears congregate on the handful of proposed bait stations is not worth the risk.

I support the following proposals:

59 - great comments...safer, longer seasons, better target animal identification.

60 - concur that archery-only deer season 1-15 Nov would mirror existing template already demonstrated on Kodiak.

61 - agree that decreasing bag limits by one deer may increase the overall quality/size of animals; request ADFG biologists validate said theory though.

69 - a viable/huntable population of Roosevelt Elk would be fantastic...assuming ADFG biologists do not foresee any negative impacts to existing ecosystems. The brown bears would appreciate it too!

75 - 100% agree with ; a wounded bear needs to count against your 4-year reset.

77 - I think this is a great way to recoup bear populations and ensure hunting this species remains an opportunity available to future generations.

81 - concur 100%; break-away mechanism will help reduce "by-catch" and could help strengthen the image of trapping within the non-hunter/trapper community.

84 - concur, but agree that ADFG biologists need to assess population density.

85 - concur, if population density supports.

90 - agree that there do appear to be increasing number of bear encounters. Recommend archery or restricted-weapons hunt be implemented as it will be less impactful to local neighborhoods/housing than a rifle season.

91/92/93 - concur that archery should included in "shotgun only" or "muzzleloader only" hunts.

96 - similar to proposal 93 with a lot of overlap; recommend using Prop 93 as the base model.

99/100/101 - new or extended brown bear seasons in a relatively highly populated area; archery tackle will decrease the risk of hunter/hiker interaction.

106/107 - ATV usage has already ruined much of the unique "Alaskan hunting experience"; now an expensive fly-in hunt is often the only way to experience the iconic Alaskan hunting experience. I do not believe this is a case of discrimination against veterans or those with disabilities.

I support the following proposals with amendments:

109 - use proposal 108 as the model, and open/close sheep registration hunts in GMU 15. Better yet, use archery-only as a control method, as outlined in proposals 110-113. Negates the need for proposal 115.

118 - combine with archery seasons.

127 - do not extend the season, adjust dates to account for later rut.

133 - 100%. Get out of your boat.

203 - due to the high probability of recreational users being within range of any hunter within Kincaid Park, offer this limited-mobility hunt, but with the use of archery tackle...this will require further research as as to how to implement said archery tackle.

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 55: Support Proposal 56: Support Proposal 57: Support Proposal 58: Support Proposal 59: Support Proposal 60: Support Proposal 61: Support Proposal 62: Support Proposal 63: Oppose Proposal 64: Support Proposal 65: Support Proposal 66: Support Proposal 67: Support Proposal 68: Support Proposal 69: Support Proposal 70: Support Proposal 71: Support Proposal 72: Support Proposal 73: Support Proposal 74: Support Proposal 75: Support Proposal 76: Oppose Proposal 77: Support Proposal 78: Support Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Support Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Support Proposal 85: Support Proposal 86: Support Proposal 87: Support Proposal 88: Support Proposal 89: Support Proposal 90: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 94: Support Proposal 95: Support Proposal 96: Support Proposal 97: Support Proposal 98: Support Proposal 99: Support Proposal 100: Support Proposal 101: Support Proposal 102: Oppose Proposal 103: Oppose Proposal 104: Support Proposal 105: Support Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Support Proposal 110: Support Proposal 111: Support Proposal 112: Support Proposal 113: Support Proposal 114: Support Proposal 115: Support with Amendment Proposal 116: Support Proposal 117: Support Proposal 118: Support with Amendment 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 with Amendment Proposal 128: Support Proposal 129: Support Proposal 130: Support Proposal 131: Support Proposal 132: Support Proposal 133: Support Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Oppose Proposal 137: Oppose Proposal 138: Oppose Proposal 139: Oppose Proposal 140: Support Proposal 141: Oppose Proposal 142: Oppose Proposal 143: Oppose Proposal 144: Support 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 Proposal 155: Support Proposal 156: Support Proposal 157: Support Proposal 158: Support Proposal 159: Oppose Proposal 160: Support Proposal 161: Support Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support Proposal 168: Support Proposal 169: Support Proposal 170: Support Proposal 171: Support Proposal 172: Support Proposal 200: Support Proposal 203: Support w/Am Proposal 204: Support Proposal 205: Support Proposal 207: Support Proposal 208: Oppose



#### Submitted by: Jerry Herrod

**Organization Name:** 

#### Community of Residence: anchorage, alaska

**Comment:** 

Proposal 162-

I oppose. The author states that one good spring hatch would constitute expansions on harvest. I disagree because one good spring hatch does not scientifically support expansion of harvest permanently in the regulations.

The harvest regulations are there for a reason. I would prefer to always have a huntable population of ptarmigan with lower harvest rather than a higher harvest and lower huntable numbers.

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Proposal 55: Oppose Proposal 56: Support Proposal 57: Support Proposal 58: Support Proposal 59: Support Proposal 60: Support Proposal 61: Support Proposal 62: Support Proposal 63: Oppose Proposal 64: Oppose Proposal 65: Oppose Proposal 66: Support Proposal 67: Support Proposal 68: Support Proposal 69: Oppose Proposal 70: Support Proposal 71: Support Proposal 72: Support Proposal 73: Support Proposal 74: Support Proposal 75: Support Proposal 76: Oppose Proposal 77: Support Proposal 78: Support Proposal 79: Support Proposal 80: Support Proposal 81: Support Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Support Proposal 85: Support Proposal 86: Support Proposal 87: Support Proposal 88: Support Proposal 89: Oppose Proposal 90: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 94: Support Proposal 95: Support Proposal 96: Support Proposal 97: Support Proposal 98: Support Proposal 99: Support Proposal 100: Support Proposal 101: Support Proposal 102: Support with Amendment Proposal 103: Oppose Proposal 104: Support Proposal 105: Oppose Proposal 106: Support with Amendment Proposal 107: Support with Amendment Proposal 108: Support Proposal 109: Oppose Proposal 110: Support Proposal 111: Support Proposal 112: Support Proposal 113: Support Proposal 114: Support Proposal 115: Support Proposal 116: Support Proposal 117: Support Proposal 118: Support Proposal 120: Oppose Proposal 121: Oppose Proposal 122: Oppose Proposal 123: Support Proposal 124: Support Proposal 125: Support Proposal 126: Oppose Proposal 127: Support Proposal 128: Oppose Proposal 129: Oppose Proposal 130: Support Proposal 131: Oppose Proposal 132: Support Proposal 133: Support Proposal 134: Support Proposal 135: Oppose Proposal 136: Oppose Proposal 137: Oppose Proposal 138: Oppose Proposal 139: Oppose Proposal 140: Support Proposal 141: Oppose Proposal 142: Oppose Proposal 143: Oppose Proposal 144: Support Proposal 145: Oppose 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 Proposal 155: Oppose Proposal 156: Oppose Proposal 157: Oppose Proposal 158: Oppose Proposal 159: Oppose Proposal 160: Support Proposal 161: Oppose Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support Proposal 168: Support Proposal 169: Support Proposal 170: Support Proposal 171: Support Proposal 172: Support Proposal 173: Oppose Proposal 174: Oppose Proposal 175: Oppose Proposal 176: Oppose Proposal 177: Oppose Proposal 178: Oppose Proposal 179: OpposeProposal 180: Oppose Proposal 181: Oppose Proposal 182: Oppose Proposal 183: Oppose Proposal 184: Oppose Proposal 185: Oppose Proposal 186: Oppose Proposal 187: Oppose Proposal 188: Oppose Proposal 200: Support Proposal 203: Oppose Proposal 204: Oppose Proposal 205: Support Proposal 207: Oppose Proposal 208: Support



Submitted by: Christi Heun

**Organization Name:** 

Community of Residence: Palmer, AK

#### **Comment:**

Trappers are not the only user group in Alaska, in fact, it's a pretty small proportion of the population that traps. The trapping community is overrepresented on the BOG and the BOG is not listening to the general public's commentary. I respect the culture of trapping in Alaska. I support it's continued presence. But I only support it responsibly. that means, mandating traps be a safe distance away from high recreation areas like trails where vastly more people are recreating besides trappers. Listen to the rest of the population, require safe distances for trap lines from trail.

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: Bretwood Higman

**Organization Name:** 

Community of Residence: Seldovia, AK

#### **Comment:**

I would like to write in support of proposal 160, to limit beaver trapping. Beavers are a uniquely important part of ecosystems, helping maintain groundwater, natural fire-breaks, and aquatic habitat. They have been overhunted in some areas of the Kenai Peninsula, and are actually extinct in some areas where they were known to reside historically. I've visited the remains of beaver dams near Homer that were likely occupied just a few decades ago but now are far from the nearest beaver.

Limiting trapping pressure is one way to improve the capacity of beavers to expand back into these degraded ecosystems.

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 150: Support



3/3/23

#### Nancy Hillstrand

#### Homer, Alaska 99603

Dear Chair Burnett and Board of Game members,

Please adopt regulations advisable for conservation and protection purposes governing the taking of sea ducks in Kachemak Bay Critical Habitat Area using the Boards statutory guidance.<sup>1</sup>

Present sea duck management is like placing deer, elk, moose, goats and bison into one aggregate bag limit using overall population spatial scale from Alaska to Mexico using uncertain subjective data to guide local sustainability. Federal overall flyway populations has little meaning for the function of Alaska's Game Management Unit system for local areas.

In past board meetings it was estimated that 1/3 of all waterfowl harvest occurs in Kachemak Bay. Efforts to perpetuate Resident Sea ducks above chronic depressed status in GMU 15 will require preventing additive factors suppressing populations. **Uncertainty means precaution.** 

My perspective is from 43 years studying wintering sea ducks and numerous hunts at my remote home in a narrow fjord of Kachemak Bay. This view has given me some insight to consider as generations of birds migrate through and residents stay for the winter.

Thank you for your valuable time, to consider unique biology, ecology and behaviour of 13 sea duck species in **7 Genera**, called Tribe Mergini. Sea ducks are not as resilient as dabblers so require your attention.

https://seaduckjv.org/

Sincerely Nancy J. Hillstrand

#### **ISSUE: SENSITIVE REPRODUCTIVE STRATEGY**

Sea duck life histories are characterized by high adult survival, delayed maturation, and low reproductive capacity, suggests population abundance of these species may be sensitive to factors influencing adult survival (e.g., harvest).

Precaution is warranted with severe uncertainty of scanty data.

https://journals.plos.org/plosone/article/file?id=10.1371/journal.pone.0175411&typ e=printable

This reproductive strategy seeks sheltered undisturbed ice-free waters for safety and investment in longevity.

<sup>&</sup>lt;sup>1</sup> AS 16.20.510. <u>Regulations</u> in Critical Habitat Areas. - The Board of Fisheries and the Board of Game, where appropriate, shall adopt regulations they consider advisable for conservation and protection purposes governing the taking of fish and game in state fish and game critical habitat areas.



ISSUE: KACHEMAK BAY IS A STATE CRITICAL HABITAT AREA in 15C recognized as wintering ice free habitat for sea duck species. Kachemak Bay accommodates 90 percent of the overwintering seabird and waterfowl populations in all of Lower Cook Inlet. https://www.adfg.alaska.gov/index.cfm?adfg=kachemakbay.main

5 AAC 95.610 Kachemak Bay and Fox River Flats Critical Habitat Management Plan. <u>https://www.adfg.alaska.gov/static/lands/protectedareas/ management plans/kach</u> <u>emak bay.pdf</u>

One-quarter of all legislatively designated alaska state critical habitats are represented in 15c (4 of 17) with the distinct **purpose for** *"perpetuation of fish and wildlife."* <u>https://www.adfg.alaska.gov/index.cfm?adfg=conservationareas.locator</u>

#### ISSUE: LEGISLATIVE GUIDANCE FOR BOARD OF GAME REGULATIONS IN CHA'S IS AS 16.20.510 "CONSERVATION AND PROTECTION" PURPOSES.

AS 16.20.510. <u>Regulations in Critical Habitat Areas.</u> - The Board of Fisheries and the Board of Game, where appropriate, shall adopt regulations they consider advisable for conservation and protection purposes governing the taking of fish and game in state fish and game critical habitat areas.

#### ISSUE: SUPPRESSION OF INEXPERIENCED JUVENILES IN PRODUCTION YEARS

The appearance of one good survival year of juveniles makes birds much more noticeable to hunters, this does not indicate stable populations. This indicates the critical time to be patient to nurture these gawky young to gain experience for populations to grow back. Since sea ducks invest in longevity rather that reproduction of large broods like dabblers, Sea duck production is highly variable requiring conservative management and precaution to regain then maintain stability away from depressed status. Production may not occur again for a decade. Robust populations are in all Alaskans interest to enjoy.

#### ISSUE: EVALUATION OF METHOD AND MEANS EMPLOYED IN THE PURSUIT OF SEA DUCKS https://shootingsportsman.com/fooling-fowl/ states in bold: "The first and best skill to master when waterfowling is to sit still"

The method and means presently employed for hunting sea ducks, does not resemble waterfowling. The use retrieval boats in continual motion, inadvertently drive, herd, and harass birds for hours at a time into decoys or run them onto clients on points with a motorized vehicle. There is a loophole in this method and is not legal harvest of wildlife.

With approximately 1400 boats in the Homer Harbour With hundreds of 20-30 knot boats outfitted for charter. High bag limits, easy fast access, continually moving boats, in these remote bays with no guide for conservation is far from fair chase.



Consider three 30 knot moving cabin cruisers, in one narrow 2500 foot wide bay, 4 groups of 4 guys shooting on either side while boats zig zag to tag team retrieval of cripples and kill, during a frenzy of over 250 shots per hour taking place. Fun? Sure. It is called sky blasting. However, the birds are in the air for hours seeking refuge at decoys while the boats play pin ball with them. This is not conservation nor fair chase. This is not waterfowl hunting.

Please evaluate how to fine tune this method and means and tighten this loophole of persistent moving boats used for retrieval of cripples and kill during shooting. The significant disturbance in wintering habitat of narrow bays with no escape weakens birds trying to conserve energy to survive icy winters. It disperses birds away from their known habitats and is a factor of decline,<sup>2</sup> known since 1710.<sup>3</sup>

#### **ISSUE: SITE FIDELITY<sup>4</sup>**

Many sea duck species, exhibit **strong site fidelity to known safe wintering** habitats like 15C Kachemak Bay. Mates come and join them and young often follow the females to their bays. Longevity in these bays can be 10-20 years in familiar surroundings where they feel safe and know there is ample food and fresh water. They remain very quiet to conserve energy, paddling along the coastline while diving for food.

#### <sup>2</sup> In 1912 Forbush moving boats as a means of disturbance and decline:

"The use of boats in chasing wild-fowl and in shooting them on feeding grounds results in driving them away. Wherever this is practiced continually the birds become scarce."

#### Ducks Unlimited also states disturbance clearly:

While hunting pressure is probably the least understood variable in the waterfowl distribution equation, we know that waterfowl do not like disturbance and will abandon heavily disturbed areas for others where they can find food and rest. Furthermore, hunting has changed in the past few decades. Advances in equipment and technology have granted easier access to nearly all places' waterfowl occur.

**USFW report 13.2.15,** "a review of several thousand journal articles and books revealed most disturbances to waterfowl created by water users chiefly boaters, anglers, hunters, researchers".

<sup>3</sup> "This fact of boats chasing wildfowl was recognized early in Massachusetts, and a law to prevent it was enacted in 1710; but this lapsed after the revolution."

<sup>4</sup> Annual Winter Site Fidelity of Barrows Goldeneye in the Pacific <u>https://wildlife.onlinelibrary.wiley.com/doi/epdf/10.1002/jwmg.21767</u>

Patterns in winter site fidelity and polycyclic aromatic hydrocarbon exposure risk in Barrow's goldeneye (Bucephala islandica) in the Pacific Northwest https://summit.sfu.ca/\_flysystem/fedora/sfu\_migrate/16388/etd9508\_MWillie.pdf

Site fidelity and the demographic implications of winter movements by a migratory bird, the harlequin duck <a href="https://www.sfu.ca/biology/wildberg/papers/IversonandEslerJAB06.pdf">https://www.sfu.ca/biology/wildberg/papers/IversonandEslerJAB06.pdf</a>



With hunting mortality additive as per the Flyway Councils, localized depletion within areas of strong site fidelity can happen very rapidly from systematic removals from commercial hunting for profit to serve clients bags going bay to bay.

#### Annual Winter Site Fidelity of Barrows Goldeneye in the Pacific

Goldeneyes from southcentral Alaska, USA, expressed greater inter-annual fidelity relative to birds from northern or southern British Columbia, Canada, and southeast Alaska. https://wildlife.onlinelibrary.wiley.com/doi/epdf/10.1002/jwmg.21767

**PROPOSAL 162 OPPOSE** extending the ptarmigan season two months longer will mean managing ptarmigan at a depressed level like is occurring with sea ducks.

ADFG research has shown that any mortality on ptarmigan after mid-January is additive and could cause population declines and return to depressed status just recovering from grave depletion. Residents are beginning to see them in places they haven't in many years yet many areas remain vacant. Like with sea ducks the misperception of a good survival year making birds much more noticeable, is the driving force behind this proposed change. It is the number of hunters, timing of season, and access by snowmobile running over them under the snow that really drives adverse effects from hunting. This season should not be lengthened and needs to remain the same to allow these birds to sustain their populations.

**PROPOSAL 163 OPPOSE.** Rescinding bag limit restrictions for sea duck hunting in Unit 15C

Unlike the rest of the Waterfowl Gulf Coast Management Zone, GMU 15C is very accessible, connected by road system to the most populated cities of Alaska.

With approximately 1400 boats in the Homer Harbour With hundreds of 20-30 knot boats outfitted for charter. High bag limits, easy fast access, continually moving boats, in these remote bays with no guardrails requires more restrictive bag limits.

Unlike the rest of the Waterfowl Gulf Coast Zone

Kachemak Bay is very special as it has many overlapping jurisdictions for conservation:

Kachemak Bay State Critical Habitat Area; Kachemak Bay State Special Purpose Site Park;

Kachemak Bay National Estuarine Research Reserve;

NOAA Kachemak Bay Habitat focus Area;

International Reserve of the Western Hemisphere shorebird reserve Network; Alaska Maritime Wildlife Refuge;

Kenai National Wildlife Refuge;

# WHAT IS THE POINT OF THE WORLD CLASS HABITAT WITHOUT ROBUST POPULATIONS OF INHABITANTS?

Sea ducks are locally recognized as being severely depleted. There is no monitoring nor waterfowl biologist within 250 miles of these wintering habitats. ADFGs severely uncertain information is subjective and warrants the precautionary approach for protection and



conservation in this Critical Habitat designed for all beneficial uses.

#### PROPOSAL 164 AND 165 SUPPORT REDUCED BAG FOR GOLDENEYE

Reduce the bag limit for goldeneye in Units 7 and 15.

- 1. ADFG has recognized a downward trend in goldeneye.
- 2. Barrows Goldeneye world population of 150,000-250,000 are in a general bag limit with dabblers numbering 40,000,000 million
- 3. East Coast Barrows are listed as concern and is closed.
- 4. Washington and British Columbia goldeneye bag limits- 2 per day in recognition localized population depletion
- 5. Barrows goldeneye have restricted range as compared to Common goldeneye
- Goldeneyes are not differentiated by species in data sets<sup>5</sup> <u>https://www.pacificflyway.gov/Documents/Databook.pdf</u>
- 7. Studies in Kachemak Bay show Strong Site Fidelity

Annual Winter Site Fidelity of Barrows Goldeneye in the Pacific Goldeneyes from southcentral Alaska, USA, expressed greater inter-annual fidelity relative to birds from northern or southern British Columbia, Canada, and southeast Alaska.

https://wildlife.onlinelibrary.wiley.com/doi/epdf/10.1002/jwmg.21767

#### PROPOSAL 166 AND 167 SUPPORT REDUCED BAG FOR BUFFLEHEAD

Reduce the bag limit for bufflehead in Units 7 and 15

- 1. Bufflehead is Genera Bucephala, of the same genus as Goldeneye shows the same sensitive ecology and site fidelity.
- 2. Washington and British Columbia bag limits are at 2 per day in recognition of the inability to recover from localized population depletion.

#### PROPOSAL 168 AND 169 SUPPORT REDUCED BAG FOR HARLEQUIN

Reduce the bag limit for harlequin in Unit 15C

- 1. There is very little information on these birds.
- 2. Rough estimates by the SDJV are 150,000 -250,000.
- 3. Harlequin are <u>very</u> susceptible to hunting pressure because they are very tame.
- 4. Washington hunters recognize susceptibility- Harlequin season closed
- 5. BC Canada hunters recognize susceptibility- **Harlequin season closed** In 2021, two Kachemak Bay Guides stated they felt harlequin needed to be reduced to one (1) to minimize clients' need to take more than one for their trophy.

#### PROPOSAL 170 SUPPORT REDUCED BAG FOR LONG TAIL DUCK

Reduce the bag limit for long-tailed duck in Units 7 and 15.

<sup>&</sup>lt;sup>5</sup> Olson, S. M. Compiler. 2022. Pacific Flyway Data Book, 2022. U.S. Department of Interior, Fish and Wildlife Service, Division of Migratory Bird Management, Helena, Montana.page



- 1. There are no comprehensive surveys of their abundance. Because they, like other sea ducks, inhabit offshore areas more than other waterfowl during winter,
- 2. long-tailed ducks are also poorly monitored by mid-winter surveys for waterfowl.
- 3. Long-tail ducks were the common sound in Kachemak Bay. The bay is now silent.
- 4. After the harvest was lowered to 2 we began to see a small population growing back off the Homer Spit that had been absent for decades.

#### PROPOSAL 171 AND 172 SUPPORT ACCURATE REPORTING OF SEADUCK HARVEST

ADF&G to implement a method for accurate reporting of sea duck harvest for Units 6, 7 and 15. To gain sorely needed data.

Sea duck Joint Venture Harvest Assessment:

Sustainability of current or potential sea duck harvest levels is largely unknown. Compared to most other waterfowl species, estimates of the number of sea ducks harvested and total number of hunters taking sea ducks is less precise, making it difficult to accurately assess the level of take and measure the impact of harvest on their populations.

https://seaduckjv.org/science-resources/sea-duck-harvest-assessment/

- 1. ADFG is managing in the blind with no data.
- 2. Guess work by authorities is not an acceptable metric to use while locals watch population decline further with no guardrails to prevent excessive take events like what happened in 1995, 1996, 2002, and 2021 to eliminate repeated suppression of populations.
- 3. Overall flyway population spatial scale is meaningless in **resident species** with strong site fidelity that return to the same bays year after year.
- **4.** ADFG's Science in the Last Frontier has a program using an app for other species that can be adjusted for thois application called:

### Welcome to ADF&G Online Harvest Reporting

https://harvest.adfg.alaska.gov/

#### HIP PROGRAM IS FAULTY KNOWN BY TOP WILDLIFE INSTITUTIONS

The HIP programs is recognized flawed, especially in Alaska.
 For instance, only one harlequin wing was returned to the wing bee giving meaningless data to authorities
 Accuracy is still years out to attempt to refine this HIP data collection. It is unreliable.

Wildlife Management Institute in 2020 explains:

https://wildlifemanagement.institute/outdoor-news-bulletin/september-2020/making-progress-improve-harvest-information-program-hip

Association of Fish and Wildlife Agencies HIP Working Group explains and shares a survey to show how wide this problem is:

https://www.fishwildlife.org/afwa-acts/afwa-committees/harvest-information-programwork-group



HIP Survey response showing lack of understanding of HIP program

- Most participants in each focus group did not know the purpose of HIP (66 of 67 participants thought the purpose of HIP was to estimate harvest);
- Most participants thought that HIP survey questions were easy but that it was hard to recall information;
- It was more difficult to predict harvest than to recall harvest totals;
- Participants wanted to know how their participation benefited hunters;
- There was confusion about state and federal agency roles;
- Email is a good way to communicate but it was hard to separate this communication from spam;
- Survey reminders were supported, preferably if participants could customize when reminders were sent;
- There was a sense of responsibility;
- There were concerns about the accuracy of data (date, amount, locations if asked after season)
- There was confusion of how group hunts were reported (double counting);
- There was concern that data would result in reduced bag limits, season restrictions, and LE;
- There were mixed reasons for why inaccurate information was provided; and
- Regarding survey enhancement registration created the most frustration. Data entry was viewed as easy, the submission process was seen as straight forward, but there was a fear that data entry would be time consuming.

# PC130

#### Submitted by: Drew Hilterbrand

#### **Organization Name:**

#### Community of Residence: Ninilchik, Alaska

#### **Comment:**

#67 Oppose. My understanding is that draw permit allocation is the primary management tool for these permits, the late season weapons restricted registration permits are in place so that if harvest quotas are not met during the regular season any surplus could be utilized by means of registration permit.

#78 Oppose. ALL recipients of draw permits are required to submit applications for the draw permits. This proposal simply stems from how the application process works particularly for nonresident applicants who are hunting with a guide that has an exclusive use federal permit in the Kodiak refuge.

#79 Oppose. There are typically more resident permits that go unhunted than nonresident. There is an alternate list in place for nonresident permit recipients and as a result most permitted hunts take place. Create an alternate list for residents so that permits awarded to residents that are unable to hunt may be reallocated to residents that can take part.

#134-142 Support. Given the number of moose that brown bears are responsible for killing each year and the population density of bears on the Kenai Peninsula I believe it would be in the best interest, of all that enjoy the ability feed our families with wild game, to lengthen brown bear seasons. Not only will this reduce the predation on our moose population it will provide additional recreational hunting opportunity for local residents.

#144 Support. I believe it is imperative that "recreational facilities" and "permanent dwelling" should be clearly defined. There is no reason that something of this importance should be left to the individual trooper's "interpretation".

#145-153 Oppose. Yet another thinly veiled attempt by anti trappers to restrict the rights of legal trappers to pursue the long held tradition of trapping in our great state. In reality most the these "user conflicts" arise due to the unwillingness of pet owners to control their animals which regularly harass already stressed wildlife in the winter. Moose in particular.

#155-156 Oppose. There are far more beaver on the lower Kenai Peninsula than most people realize. Simply because they aren't visible from the road or atv/snowmachine trails doesn't mean they no longer exist. Beaver regularly disperse and will abandon their lodges/ponds when they have cut and eaten most of the easily accessible food in relation to their dwelling.

#205 Oppose. Unless the department sees a clear decline in the harvestable surplus I would see no reason to go to drawing permit only for this area.

While it falls outside of the BOG authority to regulate, I believe the bigger issue here is the overcrowding caused by unlimited and largely unrestricted transporters.

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Proposal 67: Oppose Proposal 68: Support Proposal 73: Support Proposal 75: Support Proposal 76: Support Proposal 78: Oppose Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Oppose Proposal 105: Oppose Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Support Proposal 109: Oppose Proposal 110: Oppose Proposal 114: Oppose Proposal 120: Oppose Proposal 121: Oppose Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Oppose Proposal 125: Oppose Proposal 126: Oppose Proposal 129: Support Proposal 130: Support Proposal 135: Support Proposal 136: Support Proposal 137: Support Proposal 138: Support Proposal 139: Support Proposal 141: Support Proposal 142: Support Proposal 143: Oppose Proposal 144:

Support 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 Proposal 155: Oppose Proposal 156: Oppose Proposal 158: Oppose Proposal 159: Support Proposal 160: Oppose Proposal 162: Oppose Proposal 200: Oppose Proposal 203: Support Proposal 204: Support Proposal 205: Oppose



#### Submitted by: Lewis Hinnant

**Organization Name:** 

Community of Residence: Fritz Creek, Alaska

#### **Comment:**

I am an Alaskan resident, bow and rifle hunter and outdoor guide.

I am writing in SUPPORT of the following Proposals:

145 (Support). It is absolutely absurd to allow hunting and trapping in a designed wildlife corridor. This is unsportsmanlike and encourages the laziest and worst ethics in hunting.

146 (Support) I use KBSP regularly, often with my dog. There is so much land available for trapping, and a 100 yd setback is a modest proposal that any ethical trapper would have no problem with. Again, allowing trapping closer to the trail is encouraging lazy and unethical trappers.

147 (Support) These ski trails are treasured outdoor rec sites for local residents. Just a couple of weeks ago one of my coworkers had her dog caught in a trap near a trail. Again, allowing trapping this close to heavy used trails is lazy and unethical.

149 (Support) This is a campground. Come on. People from all over the world camp here, with their kids, dogs, etc. They shouldn't be dodging traps! Who in their right mind would oppose this proposal?

150 (Support). Same as above. This is along a highway. If these trappers are too lazy to walk 100 yards then they should get back on the couch and play video games instead of trapping.

151 (Support) same as above. High use rec areas should not be surrounded by traps. No ethical trapper would be so lazy.

152 (Support) Cooper Landing residents and visitors deserve a safe environment to live in. 100 yds is a modest proposal. It should be much further here.

153 (Support) Its a beach! Who is expecting to encounter a trap while near a beach!?

154 (Support) Signs. At least have these trappers put up signs. They're benefiting from public resources at all of our expense and safety. Are they too pathetic to put up a sign?

156 (Support) Recent scientific studies have made clear that beaver dams significantly improve the upstream ecosystem, supporting a wide variety of wildlife. If we want moose breeding grounds to exist, we need to protect the beaver.

157 (Support) Same as above. A skilled trapper or hunter won't even be affected by this.

158 (Support) Coyote trapping is ridiculous. I'm a farmer and livestock owner, and I use fences to great affect. Shortening the season is the least we can do.

160(Support) Again, beaver are essential to the entire ecosystem, retaining water in upland peat environments, supporting a variety of wildlife. The precedent set by KNWR should be repeated statewide.

For too long, ADFG has bent over backwards to support a tiny, vocal minority of hunters and trappers, some of which haven't the slightest notion of ethics or sportsmanship. It is time to set a precedent that reflects the needs of all Alaskans, and asks a bit more from the hunting and trapping community. If they can't walk 100 yards, they shouldn't be in the bush.

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 55: Support Proposal 56: Support Proposal 57: Oppose Proposal 58: Support Proposal 59: Support Proposal 60: Support Proposal 61: Support Proposal 62: Oppose Proposal 63: Oppose Proposal 64: Oppose Proposal 65: Oppose Proposal 66: Support Proposal 67: Support Proposal 68: Support Proposal 71: Support Proposal 72: Support Proposal 73: Support Proposal 74: Support Proposal 75: Support Proposal 76: Oppose Proposal 77: Support Proposal 78: Support Proposal 79: Oppose Proposal 81: Support Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Support Proposal 85: Support Proposal 86: Oppose Proposal 87: Support Proposal 88: Support Proposal 89: Oppose Proposal 90: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 94: Support Proposal 95: Oppose Proposal 96: Oppose Proposal 97: Oppose Proposal 98: Oppose Proposal 99: Oppose Proposal 100: Oppose Proposal 101: Oppose Proposal 102: Oppose Proposal 103: Oppose Proposal 104: Support Proposal 105: Support Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Oppose Proposal 109: Support Proposal 110: Support Proposal 111: Support Proposal 112: Support Proposal 113: Support Proposal 114: Support Proposal 115: Support Proposal 116: Support Proposal 117: Support Proposal 118: Oppose 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 131: Oppose Proposal 132: Oppose Proposal 133: Support Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Oppose Proposal 137: Oppose Proposal 138: Oppose Proposal 139: Oppose Proposal 141: Oppose Proposal 142: Oppose Proposal 143: Support Proposal 144: Support 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 Proposal 155: Support Proposal 156: Support Proposal 157: Support Proposal 158: Support Proposal 159: Oppose Proposal 160: Support Proposal 161: Oppose Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support Proposal 168: Support Proposal 169: Support Proposal 170: Support Proposal 171: Support Proposal 172: Support Proposal 173: Oppose Proposal 174: Oppose Proposal 175: Oppose Proposal 176: Oppose Proposal 177: Oppose Proposal 178: Oppose Proposal 179: OpposeProposal 180: Oppose Proposal 181: Oppose Proposal 182: Oppose Proposal 183: Oppose Proposal 184: Oppose Proposal 185: Oppose Proposal 186: Oppose Proposal 187: Oppose Proposal 188: Oppose Proposal 200: Oppose Proposal 203: Oppose Proposal 204: Support



Submitted by: Mary Hogan

**Organization Name:** 

Community of Residence: Homer Ak

**Comment:** 

I support proposals 145-154 regarding setbacks for trapping on popular trails.

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:

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#### Submitted by: Jeffrey Holchin

**Organization Name:** 

Community of Residence: Taylorsville NC

#### **Comment:**

As a nonresident bowhunter who enjoys the bowhunting opportunities in Alaska as much as possible, I am opposed to proposal 82 but in favor of proposals 67, 71 and 72, 87, 91 92 and 93, 99 and 100, 101, 110-113 and 119-126, which will provide more bowhunting opportunities. Thanks for this opportunity to register my opinion.

#### Jeffrey Holchin

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 87: Support Proposal 91: Support Proposal 93: Support Proposal 99: Support Proposal 100: Support Proposal 101: Support Proposal 110: Support Proposal 110: Support Proposal 110: Support Proposal 110: Support Proposal 120: Support Proposal 121: Support Proposal 122: Support Proposal 123: Support Proposal 124: Support Proposal 125: Support Proposal 126: Support



Submitted by: Claire Holland LeClair

**Organization Name:** 

Community of Residence: Anchorage, Alaska

**Comment:** 

#### Proposal #98-Oppose

I am a member of the Rainbow Valley community and I oppose Proposal #98 which would establish a brown bear hunt in the Rainbow Creek valley. The approximately 160 acres of private property within the valley is owned by the Rainbow Valley Homeowner's Association and there are seventeen homes spread throughout the area. Establishing this hunt would be a hazard to the families living in the valley as well as encourage trespass on private property. Establishing this hunt would also be a hazard to the general public. The public lands within the Rainbow Creek drainage, all part of Chugach State Park, have been closed by state regulation to the use of weapons because they are accessed and well used by the public year-round for recreation. Chugach State Park was established by the legislature to "provide areas for the public display of local wildlife" (AS 41.21.121).

#### Proposal #103-Oppose

I am opposed to Proposal #103 which seeks to establish a bear bait hunt in the McHugh Creek drainage for black and brown bear. Attracting bears to food not otherwise available to them naturally would result in bears altering their foraging behavior by seeking food from other human-provided sources, such as the community of Rainbow Valley, one valley to

the south of McHugh. The Rainbow Valley community is no stranger to bears and we have peacefully coexisted with them for years in large part by preventing bears from associating us and our homes with food.

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 98: Oppose Proposal 103: Oppose

### Cooper Landing Trap Setback Proposals, Comments & Ballot



1

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 r vay /wildlife crossings on the upcoming Cooper Landing bypass
- #149 Campgrounds: Establish 1) a 100-yard trapping setback along the perimeter of it huartz 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.

PC 135 Comments: Couper Landing Resident's have over-helling support set-backs apained our Community. These peoposa's have been sub-mittee to the BOG for many, more years. What more does it take for our community to have safe traits for an community users. Please respect the wishes ofour annum. 17 That you lease, lister to our Communities wishes These set-backs will not hunder trapping sisterice uses (feel free to add extra pages of comments) Printed Name (First and last)\*: Tel Hulsten Organization (if any) C.L. Safe IPails Signature\*: Email\*: Street Address: State\*: AL Zip code: 99574 aper Canding City

\*Indicates it must be filled in to be accepted.



Submitted by: Kathy Sarns Irwin

Organization Name: Homer Safe Trails

#### Community of Residence: Homer Alaska

#### **Comment:**

We support Proposal 147

Non Trappers worked with trappers on this proposal. The proposed 100 yd setbacks would provide a guidelines for all trail users and help prevent user conflicts on the most popular recreational trails around Homer, AK. Implementing these setbacks would help develop a new constituency of user groups working together for the common solution of sharing these trails.

We support Proposal 146

The 100 yd setback would provide guidelines for all trail users and help prevent user conflicts on the most popular recreational trails in Kachemak Bay State Park. If this is not implemented there will be more conflicts in the future on these popular trails.

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



Submitted by: Sandra Cronland

Organization Name: Homer Trails Alliance

Community of Residence: Homer, Alaska

#### **Comment:**

We are writing to support Proposals 146 and 147 in the Homer area. The Homer Trails Alliance is a 501c3 organization with the mission of promoting, maintaining and developing trails on the North side of Kachemak Bay from Anchor Point to Fox River. Making sure that all trails used in our area are safe is of utmost importance. Trail counters on several of our most popular trails indicate that there are 700-1000 people using our non-motorized trails each week in the summer, and there is an even greater number of users in the winter, plus there are many more miles of winter trails enjoyed by skiers, snowshoers and snowmachine enthusiasts. Many of the people who enjoy the outdoors also take their dogs with them. We strongly support the 100 yard set back for trapping along the trails that are groomed and maintained by skiers and snow machiners in our area. The trappers do not set and maintain their own trails, they are using the trails maintained by other organized groups that are out recreating with their families and pets. "The Mission Statement of the US Forest Service, states that to manage its lands and balance the short term and long term need of people and nature, this can be accomplished by: working in collaboration with communities and our partners." We feel that this type of collaboration should be at the top of Alaska Fish and Game priorities when addressing this issue . Thank you very much. Homer Trails Alliance

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 with Amendment Proposal 147: Support with Amendment



Submitted by: Patrck Houlihan

**Organization Name:** 

Community of Residence: Anchor Point AK

#### **Comment:**

I am writing to express my support for proposals, 146 and 147 trapping setbacks of 100 yards from trails.

I have had my own dog caught in a trap, baited with meat within 30 yards of a very major trail. I think the number of users, including users with pets and children has increased dramatically since the time when trapping was established with no setbacks from trails.

Please consider supporting both of these proposals to create a margin of safety, and a buffer free from trapping on our trails

Thank you,

Patrick Houlihan

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



Submitted by: Susan Houlihan

**Organization Name:** 

Community of Residence: Anchor Point, AK

#### **Comment:**

Regarding Proposal 146 and 147. I am in support of a 100 yd setback on both KNSC ski trails and the multiuse Snowmad trails in Unit 15C and a 100 yard set back for trapping on the Grewingk Glacier Lake Trail, Saddle Trail and Diamond Creek Trail Kachemak Bay State Park. My dog has been caught in a trap on the watermelon trail while hiking. It was baited and the trap was visible from the trail. She required vet treatment. And it was traumatic for us both. Setting traps, and baited ones at that, so close to frequently used ski, snowmachine and hiking trails should be prohibited. I'm all for supporting traditional means of harvest, but with an increase in human population, and pets, and outdoor recreation, 100 yd minimum setbacks should be strictly enforced. Thank you for your consideration.

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

Submitted by: Mitchell Hrachiar

**Organization Name:** 

Community of Residence: Homer, AK

**Comment:** 

There are more trail users than Trappers.

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 147: Support



Submitted by: Dr. J. A. Huesemann

**Organization Name:** 

Community of Residence: Sequim, WA

#### **Comment:**

Alaska is the last refuge for large predators such as wolves and bears. Both the federal government and the state should be doing everything possible to support these animals, protect their habitats, and increase their numbers. The lower 48 states are rapidly becoming overrun with increasing numbers of people from both legal and illegal immigration. Habitats are being destroyed and wildlife, especially predators, have no place to go. Alaska can stand strong against this human tide of destruction by protecting its wildlife -- especially wolves and bears who need vast spaces and a healthy prey base. It's also good for business -- tourists who want to see what the world was and still can be.

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:

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Proposal 88: Oppose Proposal 89: Oppose Proposal 90: Oppose Proposal 91: Oppose Proposal 92: Oppose Proposal 93: Oppose Proposal 94: Oppose Proposal 95: Oppose Proposal 96: Oppose Proposal 97: Oppose Proposal 98: Oppose Proposal 99: Oppose Proposal 100: Oppose Proposal 101: Oppose Proposal 102: Oppose Proposal 103: Oppose Proposal 104: Oppose Proposal 105: Oppose Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Oppose Proposal 109: Oppose Proposal 110: Oppose Proposal 111: Oppose Proposal 112: Oppose Proposal 113: Oppose Proposal 114: Oppose Proposal 115: Oppose Proposal 116: Oppose Proposal 117: Oppose Proposal 118: Oppose 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: Oppose Proposal 131: Oppose Proposal 132: Oppose Proposal 133: Oppose Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Oppose Proposal 137: Oppose Proposal 138: Oppose Proposal 139: Oppose Proposal 140: Oppose Proposal 141: Oppose Proposal 142: Oppose Proposal 143: Oppose Proposal 144: Oppose Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Oppose Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 155: Oppose Proposal 156: Support Proposal 157: Support Proposal 158: Support Proposal 159: Oppose Proposal 160: Support Proposal 161: Oppose Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Oppose Proposal 165: Oppose Proposal 166: Oppose Proposal 167: Oppose Proposal 168: Oppose Proposal 169: Oppose Proposal 170: Oppose Proposal 171: Oppose Proposal 172: Oppose Proposal 173: Oppose Proposal 174: Oppose Proposal 175: Oppose Proposal 176: Oppose Proposal 177: Oppose Proposal 178: Oppose Proposal 179: Oppose Proposal 180: Oppose Proposal 181: Oppose Proposal 182: Oppose Proposal 183: Oppose Proposal 184: Oppose Proposal 185: Oppose Proposal 186: Oppose Proposal 187: Oppose Proposal 188: Oppose



Submitted by: Steve Hughes

**Organization Name:** 

Community of Residence: Homer, Alaska

#### **Comment:**

February 25, 2023

Hello Alaska Board of Game Members,

I have been a resident of Kachemak Bay since the early 1980's and frequently travel between Homer and Jakolof Bay to access my cabin. Among my greatest pleasures is exploring the shoreline on the south side of the Bay and watching the marine and land wildlife.

I am concerned about the apparent decline in Sea Duck populations and urge you to support proposals 164 and 166 which would reduce the Bag Limits for Goldeneye and Bufflehead Ducks from 8 per day to 4 per day, allowing a total of 8 in possession.

To protect Kachemak Bay's Critical Habitat status and help restore Duck populations I hope you will oppose proposal 163. It is not the time to lift these fair and conservative restrictions.

I also urge you to maintain the current hunt dates for Ptarmigan and oppose proposal 162 which would extend those dates.

Thank you for your efforts to protect the avian inhabitants of Kachemak Bay and help maintain the amazing diversity of wildlife here.

We live along one of the most beautiful and accessible natural areas in Alaska. The ease of access makes it a wonderful place to visit for locals and people worldwide, but it can also make it vulnerable to exploitation and over harvest. That's why we need you to help protect it.

Thank you,

Steve Hughes

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 160: Support Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 166: Support Proposal 169: Support Proposal 171: Support



Mailing Address: P.O. Box 8783 Kodiak, AK 99615



KODIAK ANIMAL SHELTER Phone: (907) 486-8077 Fax: (907) 486-5056 Website: kodiakanimalshelter.org Physical Location: 2409 Mill Bay Road Kodiak, AK 99615

March 3, 2023

Re: Alaska Board of Game Proposal 81

Dear Chairman Burnett and Members of the Board,

Thank you for your consideration of Proposal 81 which was submitted by the Humane Society of Kodiak Board of Directors. We believe this proposal represents a simple, commonsense change that will meaningfully reduce negative interactions with non-target animals, and reduce user group conflict without unduly burdening trappers. While the potential for bycatch of nontarget game species (i.e., bears and deer) in snares exist throughout the Kodiak Archipelago, conflict between user groups related to domestic animals (i.e., dogs and livestock) seems most prevalent on the Kodiak Road System, therefore the geographic scope of this proposal has been limited to reflect that.

This proposal has been well received by the Kodiak community at large and the Kodiak AC recently voted unanimously to support it. Kodiak has a long and rich history of furbearer trapping; we wish to see this continue but would also like to see methods evolve in a way that protects our other valuable game species as well as our domestic animals.

Thank you again for your consideration.

Sincerely,

Humane Society of Kodiak Board of Directors Lorraine Stewart, President Cindy Trussell, Vice President Linda Lance, Treasurer Nat Nichols, Secretary Karen Yashin Chris Hicks



Submitted by: James Hundley

**Organization Name:** 

Community of Residence: Willow

**Comment:** 

Regarding proposal 176 to authorize up to 2000 cow moose permits for 14A/B

My home is in the northwest part of 14A on the Susitna River. We have had 4 years in row of heavy snow that has caused significant winter kill to the moose population in our area. I watched them die for 3 years and now there are few to see. If the last data was from 2020 I think you should reconsider the proposal. This area is accessible by boats, ATVs and snow machines from willow and Big lake making it popular with permit holders. I have not seen a cow moose for the last two years during hunting season. This area is primarily roadless so the argument about vehicle collisions is not a very good one.Thank You James Hundley

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 176: Oppose



Submitted by: John Hyde

**Organization Name:** 

Community of Residence: Juneau, AK

#### **Comment:**

I support proposal 145. Allowing hunting and trapping from within a mile of any established crossings is contrary to the intent of the crossings themselves. Allowing hunting and trapping along these corridors only benefits hunters and trappers who already have access to millions of acres in the state. These crossings are intended to help preserve the health of wildlife populations which will benefit hunters and trappers more in the long run. Healthy wildlife populations and responsible and effective wildlife management go hand in hand.

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

Submitted by: Pat Irwin

**Organization Name:** 

Community of Residence: Homer, AK

#### **Comment:**

I support proposal 147 - the 100yrd setback for trapping on mapped/established popular public Snomads and KNSC XC Ski trails. Local Homer trappers working with Homer Safe Trails agree that 100 yards is a good compromise to keep all trail users and their pets safe from traps. The trappers I know don't want to trap dogs if they can avoid it and 147 can insure that.

Thanks for considering this agreement between all trail users

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 147: Support

#### Submitted by: Brenda Jager

**Organization Name:** 

Community of Residence: Homer

#### **Comment:**

I support proposals 146 and 147. As an active outdoors woman in the Homer area I would like to be able to hike, snowshoe and skijor with my dog. As a former musher I have always been active in the outdoors with my dogs. I moved to the Homer area ten years ago to continue this lifestyle with a much smaller number of canines. I support the right to trap and hunt but feel we must have limits that ensure the safety of ourselves and our 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 146: Support Proposal 147: Support



PC147





Submitted by: Cameale Johnson

**Organization Name:** 

Community of Residence: Homer, AK

#### **Comment:**

I strongly urge the Board of Game to adopt Proposals 146 & 147, the 100yd setback from trails. It is dangerous & unconscionable to allow trapping so close to trails used by people & dogs. Dogs are trail users and use has increased considerably increasing the risk of a dog getting caught in a trap. Please help prevent any more tragic events happen by adopting Proposals 146 & 147. Regards, Cameale Johnson

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:



#### DEPARTMENT OF THE AIR FORCE HEADQUARTERS, 673D AIR BASE WING JOINT BASE ELMENDORF-RICHARDSON, ALASKA



## MEMORANDUM FOR ALASKA DEPARTMENT OF FISH AND GAME ALASKA BOARD OF GAME

FROM: 673 ABW/CC 10471 Sijan Ave JBER, AK 99506

#### SUBJECT: ALASKA BOARD OF GAME REGULATION PROPOSAL 91 (EG-F22-125)

1. Proposal 91 (EG-F22-125):

Issue:

Drawing permit hunt DL455 already allows the take of one black bear by shotgun only. Archery is a step down in weapon efficacy and should be considered as a means of take for this hunt. There are currently multiple archery hunts that already take place on JBER and there is no reason DL455 should exclude archery equipment. If this regulation change were to be adopted, hunters who draw this permit would be able to hunt with either a shotgun or a bow rather than only being limited to using a shotgun.

Proposed Solution:

Add bow and arrow to the legal means of take for DL455 in unit 14C as follows:

DL455

Unit 14C, portions of Joint Base Elmendorf-Richardson Management Area (former Fort Richardson

portion)

One bear by shotgun or bow and arrow only by permit Sept 1-June 15

2. DL455 occurs in the GMU 14C Joint Base Elmendorf-Richardson (JBER) Management Area, managed by the United States Air Force, 673d Air Base Wing. JBER has considered and does not support proposal EG-F22-125 on the following grounds:

a. DL455 is restricted to shotgun only, a determination made in the planning and decision process in 2014 to implement a black bear hunt compatible with military mission and safety requirements. Base access procedures and hunting areas, methods, means, and conditions are designated by the 673 Civil Engineer Squadron in consultation with the Alaska Department of Fish and Game, JBER Range Control, and the 673 Security Forces Squadron with endorsement of the 673 Air Base Wing Commander.

b. The use of military land for recreation is subject to safety, security, and the military mission. It is the policy of JBER to provide public access for outdoor recreation activities and the harvest of fish and wildlife when compatible with the military mission and natural resource management objectives.



Allowing archery as a means of take in DL455 increases wounding loss potential and safety conflict. The proposal identifies archery as a step down in weapon efficacy, to which JBER concurs. Inability to quickly follow-up with a second or third shot introduces higher wounding loss potential which may result in a dangerous and aggressive black bear. A wounded black bear presents safety risks to the hunter, soldiers that may be performing land navigation and maneuvering exercises or occupying bivouac sites, as well as any other individuals in the vicinity, both on and off installation.

c. JBER currently offers five archery draw hunts (DM424, DM426, DM427, DM428, and DM430) which are moose only. Wounded moose that require trailing present less of a safety risk than wounded black bears.

d. While JBER Conservation Law Enforcement Officers and Military Conservation Agents are dispatched to locate black bears that hunters have reported as wounded, JBER does not possess the resources to respond to an increase in wounded black bear reports.

e. For all draw hunts on JBER, hunters are required to pass a weapons proficiency test. Allowing both shotgun and archery to DL455 will increase resources required to qualify hunters on shotgun and archery proficiencies. JBER does not possess the resources to support this change.

3. For the reasons stated in this letter, JBER does not support adding bow and arrow as a legal means of take to DL455 as proposed.

DAVID J. WILSON Colonel, USAF Commander



#### DEPARTMENT OF THE AIR FORCE HEADQUARTERS, 673D AIR BASE WING JOINT BASE ELMENDORF-RICHARDSON, ALASKA



March 2, 2023

## MEMORANDUM FOR ALASKA DEPARTMENT OF FISH AND GAME ALASKA BOARD OF GAME

FROM: 673 ABW/CC 10471 Sijan Ave JBER, AK 99506

SUBJECT: ALASKA BOARD OF GAME REGULATION PROPOSAL 93 (EG-F22-114)

1. Proposal 93 (EG-F22-114):

Issue:

Low participation and hunter success in GMU 14C black bear drawing hunts. The current regulations limit hunter to shotgun and shotgun/muzzleloader only in DL455/457, respectively. This deters a large pool of certified black bear archery hunters from applying to hunt this underutilized resource in an area that already has a successful archery hunt for moose.

Proposed Solution:

Add certified bowhunters to applicants for drawing hunts DL455 and 457.

"... (3) Unit 14(C), JBER Management Area 1 bear every regulatory year, by drawing permit Sept 1 – June 15 Sept 15 – June 15 only; by shotgun <u>and archery</u> only; (General hunt only) up to 25 permits may be issued Unit 14(C), that portion Sept. 1 – May. 31 known as the Anchorage (General hunt only) Management Area 1 bear by drawing permit only. Shotgun, <u>archery</u>, or muzzleloader only; weekdays only; up to 20 permits may be issued in the McHugh Creek area and up to 20 permits may be issued in the Upper Campbell Creek area..."

The option to also hunt with a shotgun or shotgun/muzzleloader would remain unchanged, allowing for follow up shots (if needed). This solution presents arguably less wounding loss potential than archery-only hunts (e.g., DM424).

2. DL455 occurs in the GMU 14C Joint Base Elmendorf-Richardson (JBER) Management Area, managed by the United States Air Force, 673d Air Base Wing. JBER has considered and does not support changes to DL455 in proposal EG-F22-114 on the following grounds:

a. DL455 is restricted to shotgun only, a determination made in the planning and decision process in 2014 to implement a black bear hunt compatible with military mission and safety requirements. Base access procedures and hunting areas, methods, means, and conditions are designated by the 673 Civil Engineer Squadron in consultation with the Alaska Department of Fish and Game, JBER Range Control, and the 673 Security Forces Squadron with endorsement of the 673 Air Base Wing Commander.

b. The use of military land for recreation is subject to safety, security, and the military mission. It is the policy of JBER to provide public access for outdoor recreation activities and the harvest of fish and



wildlife when compatible with the military mission and natural resource management objectives. Introducing archery to DL455 increases wounding loss potential with use of a less efficient weapon and inability to quickly follow-up with a second or third shot. While a hunter could follow up a bow shot with shotgun as proposed, bowhunters who choose not to carry a shotgun would not have this option, thereby increasing wounding loss potential. Wounded black bears are potentially aggressive and present safety risks to the hunter, soldiers that may be performing land navigation and maneuvering exercises or occupying bivouac sites, as well as anyone else in the vicinity, both on and off installation.

c. While JBER Conservation Law Enforcement Officers and Military Conservation Agents are dispatched to locate black bears that hunters have reported as wounded, JBER does not possess the resources to respond to an increase in wounded black bear reports.

d. Hunters are required to pass a weapons proficiency test for all draw hunts on JBER. Allowing both shotgun and archery to DL455 will increase resources required to qualify hunters on shotgun and archery proficiencies. JBER does not possess the resources to support this change.

3. For the reasons stated in this letter, JBER does not support adding certified bowhunters to applicants for draw hunt DL455 as proposed.

WILSON.DAVID.JA MES.1243168658 DAVID J. WILSON.DAVID.JAMES.1243168 658 Date: 2023.03.02 15:59:57 -09'00' DAVID J. WILSON Colonel, USAF Commander



#### DEPARTMENT OF THE AIR FORCE HEADQUARTERS, 673D AIR BASE WING JOINT BASE ELMENDORF-RICHARDSON, ALASKA



### MEMORANDUM FOR ALASKA DEPARTMENT OF FISH AND GAME ALASKA BOARD OF GAME

FROM: 673 ABW/CC 10471 Sijan Ave JBER, AK 99506

SUBJECT: ALASKA BOARD OF GAME REGULATION PROPOSAL 96 (EG-F22-140)

1. Proposal 96 (EG-F22-140):

Issue:

Provide more black bear archery hunting opportunities in 14C. This is specifically for archers who have drawn a moose tag and could take a black bear while in the field if the opportunity presented itself. It is another way/opportunity to reduce the black bear predation on moose calves in 14C.

#### **Proposed Solution:**

Add a black bear archery registration hunt for residents & non residents in the Joint Base Elmendorf-Richardson management hunt area. These registration permits would be made available only to those hunters who draw a moose tag and hunt by bow and arrow. The permits and hunt period would remain valid white the moose draw tag is valid.

2. DL455 occurs in the GMU 14C Joint Base Elmendorf-Richardson (JBER) Management Area, managed by the United States Air Force, 673d Air Base Wing. JBER has considered and does not support proposal EG-F22-125 on the following grounds:

a. The existing black bear hunt on JBER (DL455) is restricted to shotgun only, a determination made in the 2014 planning and decision process to implement a black bear hunt compatible with military mission and safety requirements. Base access procedures and hunting areas, methods, means, and conditions are designated by the 673 Civil Engineer Squadron in consultation with the Alaska Department of Fish and Game, JBER Range Control, and the 673 Security Forces Squadron with endorsement of the 673d Air Base Wing Commander.

b. The use of military land for recreation is subject to safety, security, and the military mission. It is the policy of JBER to provide public access for outdoor recreation activities and the harvest of fish and wildlife when compatible with the military mission and natural resource management objectives. Allowing archery as a means of take through a black bear registration hunt increases wounding loss potential and safety conflict. Inability to quickly follow-up with a second or third shot may result in a wounded and dangerous, aggressive black bear. A wounded black bear presents safety risks to the hunter, soldiers that may be performing land navigation and maneuvering exercises or occupying bivouac sites, as well as anyone else in the vicinity both on and off installation.



c. JBER currently offers five moose draw hunts (DM424, DM426, DM427, DM428, and DM430) totaling to 98 permits for the 2023-2024 regulatory year. Adding a registration black bear hunt for JBER's moose draw hunt winners would significantly increase potential wounded black bear reports. JBER Conservation Law Enforcement Officers and Military Conservation Agents are dispatched to locate black bears that hunters report as wounded; however, JBER does not possess the resources to respond to an increase in wounded black bear reports.

3. For the reasons stated in this letter, JBER does not support adding a black bear archery registration hunt to the Joint Base Elmendorf-Richardson Management Area within 14C as proposed.

DAVID J. WILSON Colonel, USAF Commander



#### DEPARTMENT OF THE AIR FORCE HEADQUARTERS, 673D AIR BASE WING JOINT BASE ELMENDORF-RICHARDSON, ALASKA



### MEMORANDUM FOR ALASKA DEPARTMENT OF FISH AND GAME ALASKA BOARD OF GAME

FROM: 673 ABW/CC 10471 Sijan Ave JBER, AK 99506

SUBJECT: ALASKA BOARD OF GAME REGULATION PROPOSAL 100 (EG-F22-141)

1. Proposal 100 (EG-F22-141):

Issue:

Create an archery brown bear hunting opportunity on Joint Base Elmendorf-Richardson Management Area.

**Proposed Solution:** 

Provide a archery only drawing hunt for both residents and non residents. 1 bear every 4 regulatory years by bow and arrow only. Season to be open from September 1<sup>st</sup> through May 31<sup>st</sup>.

2. The Joint Base Elmendorf-Richardson (JBER) Management Area occurring in GMU 14C is managed by the United States Air Force, 673d Air Base Wing. JBER has considered and does not support proposal EG-F22-141 on the following grounds:

a. The use of military land for recreation on JBER is subject to safety, security, and the military mission. It is the policy of JBER to provide public access for outdoor recreation activities and the harvest of fish and wildlife when compatible with the military mission and natural resource management objectives.

b. Archery is a step down in weapon efficacy and increases wounding loss potential with an inability to quickly follow-up with a second and third shot. Aggressive wounded brown bears present significant safety risks to the hunter, soldiers that may be performing land navigation and maneuvering exercises or occupying bivouac sites, and anyone else in the vicinity both on and off installation. This would negatively impact military training as well as increase the risk to human safety.

c. Wounded brown bears present additional safety risk to JBER Conservation Law Enforcement Officers, Military Conservation Agents, and biologists who would be dispatched to locate wounded bears.

d. For all draw hunts on JBER, hunters are required to pass a weapons proficiency test and attend orientation and equipment inspection. JBER does not possess the resources to support this addition.



3. For the reasons stated in this letter, JBER does not support adding an archery brown bear hunt to the Joint Base Elmendorf-Richardson Management Area within 14C as proposed.

DAVID J. WILSON Colonel, USAF Commander

PC150

Submitted by: Ina Jones

#### **Organization Name:**

Community of Residence: Homer

#### **Comment:**

I do not support proposal 146 and 147. This is targeting and favoring one type of user over another. Dogs should be on leash at all times on all trails. On public lands. Unleashed dogs put all wildlife at risk, especially in the winter months. The trails are not surveyed and there is no one trail that is used in the so called public access. People bob around on and off trails all of the time and their dogs do the same. If the dogs are on leash at all times this entire problem is a moot point. On trails across the bay, unleashed dogs can chase bears in summer , which puts the owner at risk of being charged and harmed by bears. This results often in the death of the bear. ( or moose as the case may be). For the safety of all animals and owners. Just enforce the laws already on the books and keep all dogs on leash. At all times on public land.

Why should 8 incidences have more weight then the hundreds of users that have no incidences.

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 55: Support Proposal 56: Support Proposal 57: Support Proposal 59: Oppose Proposal 60: Support Proposal 61: Support Proposal 62: Oppose Proposal 63: Support Proposal 64: Oppose Proposal 117: Oppose 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: Oppose Proposal 131: Oppose Proposal 132: Support Proposal 133: Support Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Oppose Proposal 137: Oppose Proposal 138: Oppose Proposal 139: Oppose Proposal 140: Oppose Proposal 141: Oppose Proposal 142: Oppose Proposal 143: Oppose Proposal 144: Oppose 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 155: Support Proposal 155: Support Proposal 155: Support Proposal 155: Oppose Proposal 155: Support Proposal 155: Suppose Proposal 155: Suppose Proposal 155: Suppose Proposa



Submitted by: Kenneth Jones

**Organization Name:** 

Community of Residence: Cordova

**Comment:** 

Please see attached

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 59: Oppose Proposal 60: Oppose Proposal 61: Oppose Proposal 62: Oppose Proposal 63: Support